

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

STATE OF CONNECTICUT : ss: New Haven, May 11, 2021
:
:
COUNTY OF NEW HAVEN :

AFFIDAVIT

I, Chad Nelson, a Task Force Officer with the Drug Enforcement Administration, having been duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18 of the United States Code. I have been employed as a Police Officer in the State of Connecticut since March 2014 and am currently assigned to the Narcotics Special Services Unit of the New Britain Police Department. From May 2019 to the present, I have been assigned to the Drug Enforcement Administration (“DEA”) New Haven District Office (NHDO) Tactical Diversion Squad (TDS) as a Task Force Officer. As a Task Force Officer, I have participated in numerous investigations concerning violations of federal narcotics trafficking. I have coordinated controlled purchases of illegal drugs utilizing confidential sources, undercover police officers, and cooperating witnesses. I have participated in the execution of search and arrest warrants pertaining to individuals involved in the distribution of controlled substances, conducted electronic surveillance and physical surveillance of individuals involved in the distribution of controlled substances, analyzed records documenting the purchase and sale of illegal drugs, spoken with informants and subjects, as well as other local, state and Federal law

enforcement officers, regarding the manner in which narcotics traffickers obtain, finance, store, manufacture, transport, and distribute illegal drugs. I have received instruction relative to conducting drug investigations while attending in-service seminars and trainings.

2. I make this affidavit in support of:

- a. A criminal complaint and arrest warrant for Rey URENA (a.k.a. “Rueben”) for a violation of 21 U.S.C. § 846 (conspiracy);
- b. A criminal complaint and arrest warrant for Wilmer Angel RUIZ-SERRANO (a.k.a. “Chi Chi”) for violations of 21 U.S.C. §§ 841 (possession with intent to distribute, and distribution of a controlled substance) § 846 (conspiracy);
- c. A criminal complaint and arrest warrant for JUAN LNU (a.k.a. “Yan Reyes”) for violations of 21 U.S.C. §§ 841 (possession with intent to distribute, and distribution of a controlled substance) § 846 (conspiracy);
- d. A criminal complaint and arrest warrant for Ramon VARGAS for violations of 21 U.S.C. §§ 841 (possession with intent to distribute, and distribution of a controlled substance) § 846 (conspiracy);
- e. A criminal complaint and arrest warrant for Johnattan FERNANDEZ-LOPEZ for violations of 21 U.S.C. §§ 841 (possession with intent to distribute, and distribution of a controlled substance) § 846 (conspiracy);
- f. A criminal complaint and arrest warrant for Jose LORA for violations of 21 U.S.C. §§ 841 (possession with intent to distribute, and distribution of a controlled substance) § 846 (conspiracy);
- g. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search JZ Tobacco, located at 25 New Britain Avenue, Hartford,

Connecticut (**Target Location 1**), more fully described in **Attachment A** for the things described in **Attachment H**.

- h. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search Prestige Market, located at 23 New Britain Avenue, Hartford, Connecticut (**Target Location 2**), more fully described in **Attachment B** for the things described in **Attachment H**.
- i. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search 63 Colonial Street Apt. A, Hartford, Connecticut (**Target Location 3**), more fully described in **Attachment C** for the things described in **Attachment H**.
- j. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search 48 South Street Apt. B2, West Hartford, Connecticut (**Target Location 4**), more fully described in **Attachment D** for the things described in **Attachment H**.
- k. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search 21 Mountford Street floor 3, Hartford, Connecticut (**Target Location 5**), more fully described in **Attachment E** for the things described in **Attachment H**.
- l. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search 278 Columbia Blvd, Waterbury, Connecticut (**Target Location 6**), more fully described in **Attachment F** for the things described in **Attachment H**.
- m. An application under Rule 41 of the Federal Rules of Criminal Procedure for a

warrant to search a silver 2006 Jeep Commander, VIN 1J8HG48K76C214561, described in **Attachment I** for the things described in **Attachment H**.

- n. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search a gray 2017 BMW X3, VIN 5UXWX9C30H0W73879 described in **Attachment J** for the things described in **Attachment H**.
- o. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search a black 2018 BMW M3, bearing New York registration KLD4439, VIN WBS8M9C53J5J79652 described in **Attachment K** for the things described in **Attachment H**.
- p. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search a maroon 2016 Jeep Cherokee, VIN 1C4RJEAG7GC479832 described in **Attachment L** for the things described in **Attachment H**.
- q. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search a blue 2007 Ford F-150, bearing Florida paper registration U079474 described in **Attachment M** for the things described in **Attachment H**.
- r. An application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search a yellow Volkswagen Beetle, approximate model year of 2005, which as of May 11, 2021 displayed a Florida Dealer registration of PK723D described in **Attachment N** for the things described in **Attachment H**.

3. The information set forth in this affidavit comes from my personal observations and my own investigative efforts, my training and experience, and information obtained from other law

enforcement officers acting in their official capacity, who have reported their findings directly to me. I have personally participated in this investigation and am familiar with the facts and circumstances of the offenses. Law enforcement has developed information related to this investigation through physical and electronic surveillance, as well as information provided by confidential sources, undercover law enforcement officers, and cooperating witnesses. The statements contained in this affidavit are based on, in part, on my personal knowledge. Where the contents of documents, or communications with others are reported in this affidavit, they are set forth in substance and part, unless otherwise indicated. This affidavit does not purport to set forth all of the facts gathered during the course of the investigation of this matter, but rather includes only those facts which are necessary to establish probable cause to support the issuance of the requested warrants.

PROBABLE CAUSE

4. During the month of July 2019, members of the DEA New Haven District Office (NHDO) Tactical Diversion Squad (TDS) initiated an investigation into an illegal Oxycodone selling operation being conducted out of the ELZIER GROCERY in New Britain, CT. The subsequent investigation developed human source intelligence that the ELZIER GROCERY was affiliated with two bodegas in Hartford, CT; WASHINGTON MARKET, located at 453 Washington St, Hartford, CT, and JZ TOBACCO (**Target Location 1**), located at 25 New Britain Ave, Hartford, CT. Per human sources, both of the aforementioned locations were said to sell both diverted Oxycodone pills, counterfeit Oxycodone pills containing fentanyl, cocaine, and marijuana.
5. In expanding the investigation into WASHINGTON MARKET and **Target Location 1**, members of NHDO TDS learned that the FBI Northern Connecticut Violent Crime Gang Task Force (hereinafter, "FBI,") was investigating WASHINGTON MARKET **and Target Location**

1 as a part of “Operation Fallen Kings.” NHDO TDS and the FBI began to work collaboratively on the investigation. Sometime during the month of May 2020, a structure fire in the building that housed WASHINGTON MARKET caused it to close for business. Since that time, the DTO has operated primarily out of **Target Location 1**. Sometime during the month of January 2021, Investigators learned that the DTO had opened up “PRESTIGE MARKET” (**Target Location 2**) located directly next to **Target Location 1** with an address of 23 New Britain Avenue, Hartford, CT:



(Prestige Market now occupies the building on the left, JZ Tobacco on the right)

Since the beginning of January 2021, the DTO has primarily been operating their day-to-day illegal operation out of **Target Location 2**.

6. To date, NHDO TDS has conducted twelve (12) controlled purchases of hundreds of tablets of illegally diverted Oxycodone and/or counterfeit tablets containing fentanyl from WASHINGTON MARKET, **Target Location 1**, and **Target Location 2**. In addition to the controlled purchases, Investigators have also arrested four (4) individuals after they purchased illegal Oxycodone tablets from **Target Location 1**. The aforementioned purchases and arrests have revealed that the DTO employs at least twelve (12) co-conspirators that currently conduct

drug sales, transport narcotics, transport illicit proceeds, and act as lookouts and/or runners.

DTO MEMBERS

7. As will be more fully detailed herein, the DTO employs a number of individuals who participate in the ongoing conspiracy to distribute narcotics in various roles. They include:

- a. Wilmer Angel RUIZ-SERRANO, who is believed by investigators to hold a leadership role in the organization. RUIZ-SERRANO has ties to Connecticut, Pennsylvania, Florida, New York, and the Dominican Republic, and no longer appears to be involved in the day to day illegal operations of the **Target Location 1/Target Location 2** storefronts. Investigators have conducted controlled purchases of counterfeit oxycodone from RUIZ-SERRANO.
- b. Rey URENA is believed by investigators to supervise the day-to-day illegal operations of **Target Location 1/Target Location 2**. Investigators have not conducted controlled purchases directly from URENA, but have observed him handle illegal drug stashes. URENA is also the registered agent for a number of LLC's associated with the DTO, and appears highly involved in control of money within the organization. URENA also provides residences, dealer registration plates, and vehicles for the organization. URENA is also believed to be the primary individual responsible for acquiring illegal drugs for the DTO to sell at **Target Locations 1/Target Location 2**.
- c. JUAN LNU a.k.a. "Yan Reyes," is a primary seller of illegal drugs during the daytime hours at the **Target Location 1/Target Location 2**. Investigators have conducted multiple controlled purchases of counterfeit Oxycodone

tablets directly from “JUAN.”¹ “JUAN,” along with his suspected wife, Individual A, are believed to carry the stash of illegal drugs to **Target Location 1/Target Location 2** upon opening the store for business during the morning hours.

- d. Johnattan FERNANDEZ-LOPEZ was a primary seller of illegal drugs during the evening hours at **Target Location 1**. Investigators have conducted multiple controlled purchases of counterfeit Oxycodone tablets directly from FERNANDEZ-LOPEZ. FERNANDEZ-LOPEZ was also believed to carry illegal drugs and drug proceeds away from **Target Location 1** each night upon closing the store. FERNANDEZ-LOPEZ was also believed to participate significantly in acquiring illegal drugs for the DTO to sell at **Target Locations 1**. Since approximately December 2020, investigators have not seen FERNANDEZ-LOPEZ at the **Target Locations** or interact with members of the DTO.
- e. Ramon VARGAS is a third seller of illegal drugs at **Target Location 1/Target Location 2**. VARGAS works both during morning and evening hours, and will take over primary responsibilities at **Target Location 1/Target Location 2** during the absence of “JUAN” and/or FERNANDEZ-LOPEZ. Investigators have conducted multiple controlled purchases of counterfeit Oxycodone tablets directly from VARGAS. VARGAS is believed

¹ JUAN LNU is known to the CS’s as JUAN. It was only later through social media that investigators were able to identify JUAN LNU as Yan Reyes, but that name is unconfirmed at this time because it only appears on his social media profile. To ensure no confusion, attached to this affidavit as ATTACHMENT G is a picture of JUAN from one of the controlled purchases, who has a distinctive rosary tattoo on his left middle finger.

to be responsible for transporting drugs and/or monies for the DTO during the time frame that **Target Location 1/Target Location 2** are open for business during coordinated resupplies. Additionally, VARGAS is believed to participate significantly in acquiring illegal drugs for the DTO to sell at **Target Location 1/Target Location 2**.

- f. Jose LORA is a lookout and a runner within the DTO. LORA works daily at **Target Location 1/Target Location 2**, acting mostly as a lookout providing security for “JUAN,” FERNANDEZ-LOPEZ, and/or VARGAS. LORA has also been observed by investigators transporting suspected drug resupplies for the DTO.
- g. Celine RODRIGUEZ-GUERRERO is the girlfriend of Rey URENA and is believed to be a transporter of both narcotics and monies for the DTO. NHDO TDS and Connecticut State Police (CSP) conducted a “wall-off” motor vehicle stop on December 20, 2020 on RODRIGUEZ-GUERRERO who was operating URENA’s vehicle. RODRIGUEZ-GUERRERO was subsequently arrested by CSP after investigators located approximately \$51,000 in US currency and approximately 4,000 suspected diverted Oxycodone tablets in a hidden “trap” / compartment under the front passenger’s seat/floor board area.

8. There is probable cause to believe, and I do believe, that the above referenced co-conspirators are distributing and/or have distributed large quantities of both illegally diverted Oxycodone tablets along with fentanyl pressed fabricated Oxycodone tablets in the Central Connecticut region, specifically in the City of Hartford. As described more fully below, this belief is based on information from confidential sources, numerous controlled purchases of

oxycodone pills from the targets (out of the target locations), call detail records, physical and electronic surveillance, information obtained from other Law Enforcement Officers, and other information developed during the course of this investigation that I have determined to be accurate and reliable based on my training and experience.

DESCRIPTION OF TARGET LOCATIONS 3 THROUGH 6

8A. **Target Location 3** is located at 63 Colonial Street Apt# A, Hartford, CT. 63 Colonial Street is a light brown colored brick three-story apartment complex, believed to consist of twelve apartments. The building that contains **Target Location 3** has a front door which leads to a common hallway to the apartment building. **Target Location 3** is the first floor apartment on the left-hand side when facing the front of the building.



(The Front of the structure that contains **Target Location 3**)

The building that contains **Target Location 3** has an external staircase on the backside of the building that leads to green doors that access each apartment within the building individually. As

described further below, surveillance has established that DTO Members access the green door behind the building on the first floor that leads directly to **Target Location 3**. Surveillance has not established that they access any other doors to any of the other apartments.



(The rear of the building that contains **Target Location 3**, which is accessed through the green door on the first floor that is visible directly behind DTO member JUAN LNU.)

8B. **Target Location 4** is the premises known as at 48 South Street, Apt. #B2, West Hartford, CT. 48 South Street is a tan colored brick structured three-story apartment complex with a front and rear main entrance which requires a key fob. **Target Location 4** is apartment B2 located on the second floor of the apartment building. The front and rear doors open to a common area

stairwell, apartment B2 is located up the first stairwell and through an unlocked door into a common hallway. Apartment B2 is located on the south side of the building (closest to Rose Avenue) and is marked with “B2” on the white colored door. As described below in paragraph 70, NHDO TDS was able to establish that this particular apartment contained within the building is utilized by the DTO.



(The building that contains **Target Location 4**)



(The door that accesses **Target Location 4** within the building located at 48 South Street)

8C. **Target Location 5** is the third floor of the premises located at 19-21 Mountford Street Floor 3, Hartford, CT. 19-21 Mountford Street is a yellow and brown colored three-story building. The building that contains **Target Location 5** has an enclosed front porch which leads to two front doors. The building that contains **Target Location 5** has a driveway on both sides of the building and includes rear parking. The building that contains **Target Location 5** has a rear entrance that leads to a common stairwell for all three floors of the apartment building.

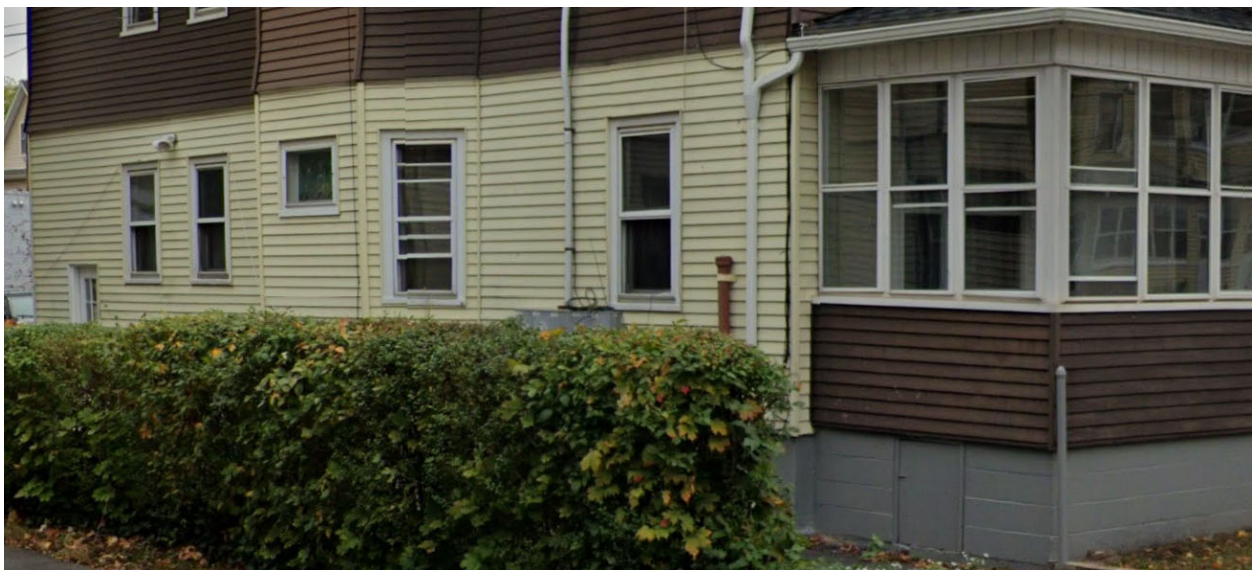


(The building that contains **Target Location 5**)

On the front of the building that contains **Target Location 5** there are two front doors. The door on the left accesses the first-floor apartment. NHDO TDS has not established a connection between the occupants of that first-floor apartment and the DTO. The door on the right leads to a staircase that provides access to both the second-floor apartment and **Target Location 5**, *i.e.*, the third-floor apartment. NHDO TDS has not established a connection between the occupants of the second-floor apartment and the DTO. As described generally below and specifically in paragraph 75, surveillance has identified DTO member JUAN LNU and INDIVIDUAL A as occupying **Target Location 5**. JUAN LNU and INDIVIDUAL A generally access their apartment through a side door of the building that contains **Target Location 5** that leads to a stairwell that provides access to all three apartments.



(The front doors to the building that contains **Target Location 5**)



(The building that contains **Target Location 5** with side-access visible to the left)

DESCRIPTION OF TARGET VEHICLES

8D. As described in the paragraphs below, the vehicles for which I seek a search warrant are utilized regularly by members of the DTO in furtherance of their drug trafficking. Members of the DTO use multiple vehicles and often store drugs within their vehicles within “traps” as described further below. Members of the DTO also often switch vehicle registrations between and among the various vehicles

8E. **Target Vehicle 1** is a silver 2006 Jeep Commander, VIN 1J8HG48K76C214561, registered to “Wilmer A. RUIZ SERRANO” 890 E Sanger Street, Philadelphia, PA, which as of May 10, 2021 displayed no vehicle registration. The raised lettering located on the body panel of the rear lift gate above the license plate that describes the vehicle’s manufacturer, i.e. Jeep, is missing the letter “J”. As described below in paragraphs 87, it was used in furtherance of a suspect drug deal on March 30, 2021.



8F. **Target Vehicle 2** is a gray 2017 BMW X3, bearing New York registration JCT6037, VIN 5UXWX9C30H0W73879, registered to “Ramon D. URENA” 476 W 165th Street # 1J, New York, NY. As described below in paragraphs 74 through 76, it was used in furtherance of a suspected drug transaction on January 19, 2021.



8G. **Target Vehicle 3** is a black 2018 BMW M3, bearing New York registration KLD4439, VIN WBS8M9C53J5J79652, registered to “Francesca R. SERRANO” 3820 Bailey Avenue 1A, Bronx, NY. As described below in paragraphs 85-83, it was used in furtherance of a suspected drug transaction on March 30, 2021.



8H. **Target Vehicle 4** is a maroon 2016 Jeep Cherokee, VIN 1C4RJEAG7GC479832, which as of May 10, 2021 displayed a Florida Dealer registration of PK285J, registered to Prestige Broadway Auto Sales LLC, 2926 N. Orange Blossom Trail, Orlando, FL. As described below in paragraphs 112-117 it was last used in furtherance of a suspected drug transaction on May 10, 2021



8I. **Target Vehicle 5** is a blue 2007 Ford F-150, bearing Florida paper registration U079474, 2 door, 4 wheel drive, 6 foot bed, regular cab, with tow hitch receiver. As described below in paragraphs 112-117 it was last used in furtherance of a suspected drug transaction on May 10, 2021.



8J. **Target Vehicle 6** is a yellow Volkswagen Beetle, approximate model year of 2005, which as of May 11, 2021 displayed a Florida Dealer registration of PK723D, registered to Prestige Broadway Auto Sales LLC, 2926 N. Orange Blossom Trail, Orlando, FL. Vehicle is missing the front Volkswagen emblem. As described below in paragraphs 107-111 it was last used in furtherance of a suspected drug transaction on May 6, 2021.



CS Information regarding the SERRANO / URENA DTO and its members

9. During the month of, or around, November 2019, after attending a proffer with an FBI cooperating informant, DEA NHDO TDS members received information regarding the illegal sales of Oxycodone pills in the Hartford area, specifically being sold out of Washington Market and **Target Location 1**. As a result of information obtained from this proffer, investigators later utilized a Police Officer working in an undercover capacity, hereinafter referred to as the UC, to conduct controlled purchases from Washington Market and **Target Location 1**. As the investigation progressed, investigators utilized several different credible and reliable confidential informants (CI) to conduct controlled purchases from the **Target Locations** and its DTO members.

CONTROLLED PURCHASES

Controlled Purchase Protocol

10. DEA NHDO TDS has directed multiple controlled purchases using either the aforementioned UC, CS-1 or CS-2 to make purchases of illegal narcotics from DTO members at the **Target Locations** between January 2020 and March 2021. It should be noted that the aforementioned CS's have cooperated with this investigation in order to receive monetary compensation. For each of these purchases, law enforcement would first meet with the confidential sources at a secure location and search them and their vehicle (if applicable). After searching them, they would be equipped with an audio/visual recording device – except for the May 14, 2020 purchase, in which CS-2 was equipped with only an audio recording device. The sources were also provided money to purchase the drugs. Once equipped, the sources would be directed to drive to the **Target Location**. For each purchase, law enforcement maintained surveillance on the sources from the secure location to the **Target Location**. The confidential

sources then entered the **Target Location** by themselves while law enforcement maintained surveillance on the location from outside of it. Once the confidential sources emerged, they then drove back to the secure location under constant surveillance by law enforcement. Upon reaching the secure location, they provided the contraband they purchased to law enforcement and the recording devices were removed. The sources were then searched and debriefed. In each of the controlled purchases described below the conversations took place primarily in Spanish.

January 8, 2020 Controlled Purchase

11. On January 8, 2020, members of the NHDO TDS and the FBI utilized a Police Officer working in an undercover capacity, hereinafter referred to as the UC, to purchase a quantity of suspected fentanyl pressed Oxycodone pills at the Washington Market, located at 453 Washington Street, Hartford, CT, consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with the UC at a secure location, where the UC provided TFO Nelson with a clear plastic knot-tied sandwich bag containing fifteen (15) small round blue pills; all of which were stamped with “M/30.” The UC stated that when he/she first arrived at the bodega, he/she made contact with an older male with curly reddish colored hair sitting towards the right of the front desk, who the UC later positively identified as RUIZ-SERRANO (AKA “Chi Chi”). RUIZ-SERRANO asked the UC what he/she wanted. The UC told RUIZ-SERRANO that he/she wanted to buy pills. At this time RUIZ-SERRANO directed the UC to head to the back of the store. The UC proceeded to walk to the rear of the bodega where he/she observed a large “Plexiglas” floor to ceiling window with a small “mail slot” in the glass. The UC made contact with a younger Hispanic male with a beard behind the glass as well as another Hispanic male (“UM-1”) wearing glasses who was fixated watching a large TV monitor that the UC believed to be surveillance cameras. UM-1 asked the

UC how many pills he/she wanted to purchase, to which the UC responded fifteen (15). UM-1 stated that he only had 10 of the 30 mg oxycodone pills left. At this time UM-1 yelled over to RUIZ-SERRANO advising him that the UC wanted to buy 15 pills. RUIZ-SERRANO told UM-1 to make the deal and motioned for him to go get more pills. The UC stated that UM-1 exited the rear of the store through a back door. At this time the UC stated that he/she stepped outside for a couple minutes to wait for UM-1 to return with the pills. When the UC re-entered the bodega, he/she observed that UM-1 was already back in the store counting out fifteen (15) pills on the table behind the Plexiglas area. UM-1 then handed the UC the pills in exchange for money.

January 30, 2020 Controlled Purchase and Surveillance

12. On January 30, 2020, members of the DEA NHDO TDS along with members of the FBI Northern Connecticut Violent Crime Gang Task Force were conducting surveillance at 63 Colonial Street apt A, Hartford, CT (**Target Location 3**) when FBI SA Medina observed a Hispanic Male wearing a puffy black coat and gray pants (later confirmed to be “JUAN”), exit **Target Location 3**. Shortly after, a Hispanic female (later confirmed to be Individual A), exited **Target Location 3** carrying a small black plastic bodega bag that looked to be knotted with a softball sized object within. “JUAN” and INDIVIDUAL A left Colonial Street and proceeded on foot to Washington Market. During the trip, INDIVIDUAL A handed off the knotted bodega bag to “JUAN.” JUAN and INDIVIDUAL A opened up the Washington Market. At approximately 11:14 AM, as planned, the UC arrived at Washington Market. The UC entered Washington Market and made contact with “Pucho” (FNU LNU) regarding a transaction for Oxycodone pills. The UC stated that when he/she first arrived at the bodega, he/she made contact with INDIVIDUAL A who was sitting behind the front counter. The UC asked

INDIVIDUAL A for “Pucho.” The UC stated that INDIVIDUAL A then motioned towards the back and called out “Pucho.” The UC stated that he/she met with Pucho in the middle of the store near the groceries. The UC stated that he/she asked Pucho if he had “30s” to which Pucho replied “we don’t have them.” The UC stated that he/she attempted to trigger Pucho’s recollection of him/her from a previous meeting that the UC had with Pucho during a controlled purchase conducted by the FBI (prior to the initiation of NHDO TDS’s investigation); however, the UC stated that Pucho ultimately told the UC that he would have the pills later and advised the UC that he/she could come back. At this time the UC left the store, entered his/her vehicle, and proceeded to drive away. The UC stated that he/she returned to the Washington Market approximately five minutes later with the intention of asking Pucho if there was some place else where he/she could purchase pills. When the UC entered the store, INDIVIDUAL A motioned for him/her to go to the back of the store where Pucho was located behind the Plexiglas area of the store. The UC stated that Pucho then asked the UC what he/she wanted. The UC advised Pucho that he/she wanted to purchase “30, thirties.” Pucho asked several times for the UC to clarify the quantity of pills that he/she wanted, to which the UC repeatedly told him “30.” The UC stated that he/she then told Pucho that he/she had \$1,000.00. At this time the UC stated that Pucho instructed him/her to follow him into the back room area behind the Plexiglas. The UC stated that he/she followed Pucho into the back room area at which time Pucho opened a metal door that led to the back parking lot. Pucho then called outside to “JUAN.” At this time, the UC stated that JUAN came inside holding a black plastic bodega bag. (Note: the bag appeared to be the same or similar as what JUAN and INDIVIDUAL A brought to the Washington Market from **Target Location 3** when they opened it). JUAN then took out a circular “hockey puck” sized pill container and asked the UC how many he/she wanted. The UC stated that he/she again told

Pucho and JUAN that he/she wanted “30, thirties.” Pucho then began using a calculator to determine the total price as JUAN started to count out the pills. After JUAN completed counting out the 30 pills in his hand, Pucho placed the pills into a ripped corner sandwich baggie piece of plastic and handed the product to the UC in exchange for the money.

May 14, 2020 Controlled Purchase – Audio only

13. On May 14, 2020, members of the NHDO TDS utilized **CS-2** to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-2 at a secure location, where CS-2 provided TFO Nelson with a knot tied piece of plastic (“corner bag tear”) containing three (3) small round blue colored pills stamped “m 30.” CS-2 stated that he/she purchased the pills from a heavy-set Hispanic male with a beard suspected to be JUAN. CS-2 further stated that when he/she was purchasing the pills from the back room area of **Target Location 1**, he/she clearly observed a clear plastic bag containing “about 2,000 pills” on the table.

August 20, 2020 Controlled Purchase and Surveillance

14. On August 20, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing ten (10) suspected Oxycodone 30 mg pills each stamped “M 30,” which CS-1 had purchased from FERNANDEZ-LOPEZ and VARGAS, as well as in the presence of LORA.

15. During the review of the aforementioned audio/video recording device, investigators observe illegal drug transactions being conducted by FERNANDEZ-LOPEZ with multiple

unknown black male customers. The transactions are conducted through the door, which FERNANDEZ-LOPEZ and/or VARGAS open just wide enough to accept payment of U.S. Currency, and to subsequently hand illegal drugs back to the buyer(s). On separate occasions, the video captures two further unknown black males who conduct illegal drug transactions with FERNANDEZ-LOPEZ via the slightly adjacent door. The video clearly captures U.S. currency being handed into the door, and illegal drugs in plastic bags being passed out to the buyers. CS-1 enters the room, and begins to speak to FERNANDEZ-LOPEZ about his/her order primarily in Spanish, while VARGAS stands watch. The table where FERNANDEZ-LOPEZ is seated at holds a large television screen, which displays the store's video surveillance system. The screen is set up in a multiple view format, allowing FERNANDEZ-LOPEZ and VARGAS to monitor multiple cameras at once. Additionally, plastic bags containing pills and what appears to be other illegal drugs are plainly visible on the table, as is an apparent Glock semi-automatic firearm with a mounted weapon light. The handgun is displayed prominently on the table, with no apparent effort to hide or conceal it, and is within arm's reach of FERNANDEZ-LOPEZ at all times. A stack of U.S. Currency is also on the table. LORA appears on the video in the back room with FERNANDEZ-LOPEZ and VARGAS. At this point, FERNANDEZ-LOPEZ gives CS-1 the pills in exchange for monies and CS-1 leaves the store.

16. Later that night, at approximately 9:13 PM, TFO Nelson observed LORA walking in and out of **Target Location 1**. At 9:17 PM, TFO Nelson observed an older Hispanic male wearing a blue T-shirt and track pants exit **Target Location 1**. This male is familiar to members of NHDO TDS, who know him to be an employee of the store and suspected drug runner for the DTO. Later, based on comparison with a CT DMV photograph, the male was positively identified as Juan CORTES.

17. At approximately 9:41 PM, TFO Nelson observed that most of the lights inside of **Target Location 1** were turned off, likely indicating that the store was nearing closing time. At approximately 10:01 PM, TFO Nelson observed an older model vehicle believed to be a gray Subaru, with a mismatched color black bumper (as further described in **Attachment I**), park in the parking lot adjacent to **Target Location 1**. The vehicle remained stationary and occupied. TFO Tessier observed that the vehicle displayed CT registration AN46767. A check of CT DMV records revealed this plate belonged on a BMW X3, and the registered owner was Rey URENA, who is known to members of NHDO TDS to be a target of the investigation and member of the DTO.

18. At approximately 10:03 PM, TFO Nelson observed the Subaru pull directly in front of **Target Location 1**, where it parked, and again remaining stationary and occupied. At approximately 10:16 PM, TFO Nelson observed all the remaining lights inside **Target Location 1** go off. At approximately 10:21 PM, TFO Nelson observed VARGAS exit the front door of **Target Location 1**, lock the door, and then walk down the driveway towards the rear of the building. At approximately 10:22 PM, TFO Nelson observed LORA walking from the rear of **Target Location 1** towards the front of the building. LORA entered the Subaru carrying a stack of U.S Currency in his hand which was roughly the size of a standard brick. At approximately 10:22 PM the Subaru departed the parking lot of **Target Location 1**. Members of NHDO TDS maintained constant surveillance on the Subaru as it proceeded eastbound on New Britain Ave, turned left to head northbound on Washington St, turned left again to head westbound on Colonial St, and finally parked in the street in front of 63-65 Colonial Street at approximately 10:24 PM. At this time, TFO Verillo had taken up a surveillance position that afforded a clear view of the rear of the structure that houses 63-65 Colonial St, Hartford, CT

(Note: **Target Location 3** is an apartment within this structure). At approximately 10:24 PM TFO Verillo observed LORA and CORTES walk from Colonial Street to the back of 63-65 Colonial Street. CORTES was observed to be carrying a large backpack, and was wearing the same blue T-shirt and track pants as before. CORTES ascended a stairway on the rear, east side of the building. He was followed shortly after by LORA, who unlocked and entered a door on the second floor of the building, later determined to be 63 Colonial Apartment B (which was directly above the JUAN LNU and INDIVIDUAL A residence at the time).

19. At approximately 10:34 PM, TFO Verillo, still in the area of the rear of 63-65 Colonial St, observed VARGAS arrive, walking from Colonial St. to the rear of the building. VARGAS entered apartment B as LORA had earlier.

September 3, 2020 Controlled Purchase

20. On September 3, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing ten (10) suspected Oxycodone 30 mg pills each stamped “M 30,” which CS-1 had purchased from JUAN. CS-1 stated that he/she entered **Target Location 1** and greets INDIVIDUAL A at the front counter. CS-1 greets LORA who is seated against a wall approximately halfway back in the store. CS-1 advised investigators that both INDIVIDUAL A and LORA are commonly utilized as the “look-outs,” and are strategically placed in the front of the store for when customers enter, as well as in the middle of the store as to protect the rear door access point. CS-1 stated that he/she then made contact with JUAN in the rear room. CS-1 asks JUAN if the pills he/she is buying are the real ones and JUAN tells CS-1

that they are the “regular ones.” CS-1 asks JUAN, “The bad ones? And JUAN responds yes. JUAN explains he charges less for the “regular ones” but the good ones are more expensive. CS-1 stated that the “regular ones” or the bad ones are known to be pressed with fentanyl. JUAN also provided CS-1 a telephone number he could call in the future to coordinate additional drug purchases.

September 10, 2020 Controlled Purchase and Surveillance

21. On September 10, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing twenty (20) suspected Oxycodone 30 mg pills each stamped “M 30,” which CS-1 had purchased from VARGAS. CS-1 stated that upon entering the store, he/she greets LORA at the front counter. LORA puts up his index finger advising CS-1 to wait prior to approaching the rear of the store, as he customarily does. There was a female patron utilizing the ATM at the time, and LORA wanted the female to depart prior to allowing CS-1 to proceed to the rear room. After the female departs the store, CS-1 walks to the rear of the store and shouts “Yo yo” as he approaches the rear door. The door opens just a few inches and is being restricted by a thick chain which is at about eye level. CS-1 makes contact with VARGAS who is seated at the table in the back room as previously utilized in prior purchases. After briefly discussing price, VARGAS shows CS-1 a circular plastic pill tray container, with various colored tablets, housed in individual compartments. VARGAS advises CS-1 that he thinks these are the ones he/she usually gets, as he is pointing at a compartment full of blue colored pills. VARGAS is observed counting and bagging the tablets in a small plastic sandwich bag that he knotted closed.

CS-1 then gives VARGAS cash in exchange for the pills.

22. Following the controlled purchase, investigators maintained physical surveillance of **Target Location 1** as well as the DTO members. At approximately 9:06 p.m., TFO Nelson observed VARGAS and LORA leaving **Target Location 1**. VARGAS entered the passenger compartment of a white BMW X5 bearing FL dealer registration PK723D (as further described in **Attachment I**), which was parked in the parking lot of the Top Kat Super Laundromat, which is located across the street at 36 New Britain Ave. TFO Torres observed LORA removing a cover off of a scooter (as further described in **Attachment I**) which was parked near the entrance of **Target Location 1**. LORA was wearing a backpack and proceeded onto New Britain Avenue towards Broad Street. Investigators observed the white BMW X5 circle the block of Broad St., School St., Colonial St., and Washington Ave. several times in a clear effort to thwart any possible surveillance efforts of law enforcement. TFO Verillo observed the white BMW X5 parked in front of 63 Colonial St. TFO Nelson observed LORA operating the scooter on Broad St. towards Colonial St. TFO Nelson observed LORA park his scooter in the rear parking lot located behind 63 Colonial Street. TFO Nelson observed LORA open the compartment under the seat of the scooter, reach in, and remove numerous plastic baggies from said compartment. TFO Nelson then observed LORA place the plastic baggies into his backpack and proceed to walk up the rear staircase and enter the apartment door located on the second floor (furthest door to the east side of the building) – 63 Colonial Street apartment B. Investigators observed the white BMW X5 leave the residence on Colonial St. and maintained constant surveillance of the vehicle as it proceeded to 48 South Street, West Hartford, CT, which is the building that contains **Target Location 4**. Shortly after arriving at 48 South Street, TFO Verillo observed Rey URENA exit the operator's seat of the BMW. VARGAS was not seen exiting the vehicle which led

investigators to conclude that he was dropped off by URENA at 63 Colonial Street.

September 24, 2020 Controlled Purchase and Surveillance

23. On September 24, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing fifty (50) suspected Oxycodone 30 mg pills, which CS-1 had purchased from FERNANDEZ-LOPEZ. CS-1 stated that upon entering the store, he/she greeted LORA, who was sitting behind the front counter. CS-1 then proceeded to walk towards the rear of the store, approaching the back room where the narcotics deals take place. CS-1 stated that he/she made contact with “Indio,” who was later identified by investigators to be FERNANDEZ-LOPEZ. CS-1 stated that FERNANDEZ-LOPEZ permitted him/her to enter the back room where FERNANDEZ-LOPEZ was seated. CS-1 stated that he/she advised FERNANDEZ-LOPEZ that he/she had called “JUAN” earlier in the day and had arranged for the purchase of fifty (50) pills. CS-1 stated that he/she asked FERNANDEZ-LOPEZ about the “good ones” and the “bad ones,” stating that he/she needed the “30’s.” CS-1 confirmed with investigators that typically the good ones are actual pharmaceutical grade pills (more expensive to purchase) and the bad ones are fake Oxycodone pills alleged to be pressed with fentanyl. CS-1 advised FERNANDEZ-LOPEZ that he/she usually pays \$32.00 per pill for the bad ones. FERNANDEZ-LOPEZ replied to CS-1 by stating that he gets the pills from his friend, a black guy, who is hard to deal with when it comes to lowering the price. CS-1 told FERNANDEZ-LOPEZ that if he needed to combine the good ones and the bad ones in order to get to 50 pills for \$1,600.00, then that was acceptable. CS-1 stated that at this time, FERNANDEZ-LOPEZ counted out 50 pills from a plastic circular

container, placed them in a knot tied baggie, and exchanged them with the CS for the cash.

24. Following the controlled purchase, investigators maintained physical surveillance of **Target Location 1** as well as the DTO members associated within. At approximately 9:55 PM, TFO Torres observed a gray Jeep Commander bearing FL Dealer registration PK724D (hereinafter “**Target Vehicle 1**”) exit the rear of **Target Location 1**. TFO Nelson established surveillance in the rear of 40 Alden Street, Hartford, CT. TFO Torres maintained surveillance on the **Target Vehicle 1** as it proceeded directly from **Target Location 1** to the rear parking lot of 40 Alden Street. TFO Nelson observed FERNANDEZ-LOPEZ exit the vehicle with two bags in his hands and enter 40 Alden Street 1st floor left door, believed to be apartment 103. TFO Nelson observed one bag appeared to be a Walmart plastic reusable bag with a brick like shape in it, suspected to be money proceeds from **Target Location 1**.

October 8, 2020 Controlled Purchase

25. On October 8, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing fifty (50) suspected Oxycodone 30 mg pills, which CS-1 had purchased from “JUAN” LNU. CS-1 stated that he/she entered the store and walked towards the rear of the store, approaching the back room where the narcotics deals take place. CS-1 stated that he/she made contact with “JUAN,” who permitted CS-1 to enter the back room. CS-1 stated he/she observed VARGAS in the room with "JUAN." CS-1 stated that he/she asked "JUAN" if he had enough to purchase (50) pills, to which “JUAN” responded that he did. CS-1 observed “JUAN” count out the pills from a circular plastic container as referenced from prior controlled purchases. CS-1

stated that he/she asked "JUAN" if those were the "bad ones," referring to the counterfeit Oxycodone pills. "JUAN" responded, yes. CS-1 stated that "JUAN" placed the pills in a plastic baggie, which he knotted and exchanged them with CS-1 for cash.

October 22, 2020 Controlled Purchase

26. On October 22, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic ("corner bag tear") containing fifty (50) suspected Oxycodone 30 mg pills, which CS-1 had purchased from "JUAN" LNU. CS-1 stated that he/she entered the store and greeted LORA who was at the front counter. CS-1 then proceeded to walk towards the rear of the store, approaching the back room where the narcotics deals take place. CS-1 stated that he/she made contact with "JUAN," who was sitting in the back room. "JUAN" permitted CS-1 to enter the room. CS-1 stated that he/she observed what he/she believed to be counterfeit oxycodone pills, cocaine, and marijuana on the counter in front of "JUAN." CS-1 stated that he/she asked "JUAN" if he had enough to purchase (50) pills, to which "JUAN" advised that he did. CS-1 stated that he/she observed "JUAN" select and count out (50) pills from a circular plastic container, as referenced in prior controlled purchases. CS-1 stated that "JUAN" placed the pills in a plastic baggie, which he knotted and exchanged it with CS-1 for the cash. Following this portion of the drug transaction, CS-1 proceeded to leave the back room, and was greeted by VARGAS, who was entering the back room at that time.

November 6, 2020 Controlled Purchase

27. On November 6, 2020, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 1** consistent with the controlled purchase protocol described

above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing twenty-three (23) suspected Oxycodone 30 mg pills, which CS-1 had purchased from “JUAN” LNU. CS-1 stated that upon entering the store, he/she made contact with CABRERA-DEALVAREZ, was manning the front counter. CS-1 stated that he/she greeted INDIVIDUAL A and then proceeded to walk towards the rear of the store, approaching the back room where the narcotics deals take place. CS-1 stated that he/she made contact with “JUAN,” who was sitting in the back room. “JUAN” permitted CS-1 to enter the room. CS-1 stated that he/she observed what he/she believed to be counterfeit oxycodone pills and marijuana on the counter in front of “JUAN.” CS-1 stated that he/she asked “JUAN” how many pills he/she could purchase with \$750.00 cash. “JUAN” utilized a calculator and told CS-1 that 23 pills would cost \$736.00. CS-1 stated that he/she observed “JUAN” select and count out the pills from a circular plastic container, as referenced from prior controlled purchases. CS-1 stated that “JUAN” placed the pills in a plastic baggie, which he knotted and exchanged it with CS-1 for the cash. The foregoing conversation took place primarily in Spanish.

December 22, 2020 Telephone Call with JUAN

27A. On December 22, 2020 at approximately 7:30 PM investigators met with CS-1 who placed a phone call to the telephone number provided by JUAN LNU to CS-1 on September 3, 2020. The phone call was recorded and the conversation took place primarily in Spanish, and was later translated as follows by TFO Torres:

Juan: Hello.

CS: Hello Cousin.

Juan: Cousin.

CS: Cousin.

Juan: Talk to me cousin, I can hear you.

CS: How are you doing?

Juan: We are good, how are you doing? Where have you been?

CS: I was fucked up with Covid brother.

Juan: Do not play cousin.

CS: Yes, I was in the hospital.

Juan: Damn!

CS: So what's up? What are you doing?

Juan: We are tranquil, we are tranquil. Where are you?

CS: I am in my house. I stopped by earlier, but I could not do anything, it was closed.

Juan: Yes, yes, tomorrow.

CS: Is everything ok?

Juan: Yes, yes.

CS: Yes like I said, I went by to get at least two because I am not working brother.

Juan: Yes, yes, tomorrow.

CS: Until I do not get my paperwork that I am cleared, I can not go back to work.

Juan: Ok, ok.

CS: Yes I got Covid really bad, but that is why my voice sounds hoarse.

Juan: Yes, I wondered where you were. It has been a while since I heard from you and I wondered what is up with cousin.

CS: It fucked me up bad. I am asthmatic.

Juan: Oh God, you were fucked.

CS: Yes since I am asthmatic, it makes it difficult for me to breathe.

Juan: Head on over there tomorrow, because there is no “wood.” They will be there tomorrow.

CS: Will you be there?

Juan: Yes, yes.

CS: Let me see if I can get some more money, because I want to get something, because it is a long weekend.

Juan: Yes, head on over there.

CS: I am going to stop by over there. If I do not stop by tomorrow, I am going to call you to let you know when I am coming.

Juan: Ok, perfect.

CS: I wanted to grab at least one for today.

Juan: Not today. They had a problem with some keys that they could not find.

CS: Maybe they lost them.

Juan: No, they found them.

CS: Yes, I called you now but I did not hear anyone speaking at first. I said cousin does not want to speak to me.

Juan: I said hello, hello, and you did not hear me.

CS: Yes I am here just tranquil at my house. The cold weather is causing my back to hurt a lot.

Juan: The cold too? That together.

CS: Yes, and I do not have any strength because I do not have any pills.

Juan: Wood cousin, wood.

CS: What?

Juan: Wood, wood.

CS: What do you mean wood, I do not understand.

Juan: You know the wood that is over there.

CS: Oh, the good one?

Juan: Yes, wood, yes. All types of wood, for doors, you know.

CS: Now I understand you.

Juan: Well you know, we will see you tomorrow.

CS: I will call you before heading over there.

Juan: Sounds good.

CS: Ok, take care.

Juan: Ok.

27B. Based on my training and experience and the facts of the investigation, I believe that CS-1 and JUAN were discussing the fact that CS-1 had not been in for a while. CS-1 explains that he had COVID-19 and JUAN told him that he could come by to purchase “wood” tomorrow. “Wood,” based on my training and experience and the facts of this investigation, is a reference to pills. Indeed, later in the conversation CS-1 says that he does not have any pills and JUAN corrects him to say “wood” instead of pills.

February 12, 2021 Controlled Purchase

28. During the months of November and December, 2020, Investigators learned that the URENA/SERRANO DTO was going to be opening up another location directly next to **Target Location 1**: At 23 New Britain Avenue in Hartford, CT. This new business, “PRESTIGE MARKET” (**Target Location 2**), appeared to open to the public sometime in the beginning of

January 2021, and has since become the primary source where customers can obtain/purchase illegal narcotics from all of the same members of the DTO. On February 12, 2021, members of the NHDO TDS utilized CS-1 to purchase a quantity of Oxycodone pills at **Target Location 2** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing twelve (12) suspected blue colored Oxycodone 30 mg pills and one (1) suspected pink colored Oxycodone 10 mg pill, which CS-1 had purchased from “JUAN” LNU. CS-1 stated upon entering **Target Location 2**, he/she made contact with INDIVIDUAL A, who was at the front counter of the store, in the same fashion that she typically held at **Target Location 1**. Since it was CS-1's first time at the new store, INDIVIDUAL A advised him/her to walk towards the rear of the store. CS-1 stated that he/she walked towards the rear of the store, and observed a wooden door, located at the left side of the store. CS-1 stated that as he/she approached the door, it unlocked and opened. CS-1 stated that he/she observed LORA acting as the “door man.” CS-1 stated that he/she looked into the room, and observed an unidentified Hispanic male (UM), standing behind LORA. CS-1 stated that he/she observed JUAN LNU and VARGAS, seated at a table next to one another. CS-1 stated that he/she observed a large plastic bag full of pills in between JUAN and VARGAS on the table. After discussing the price, CS-1 stated that he/she handed the money to JUAN while VARGAS counted out and bagged the pills. A review of the video revealed that members of the DTO had a camera security system set up with feeds to cameras outside visible in the back room similar as to **Target Location 1**.

March 30, 2021 Controlled Purchase

29. On March 30, 2021, members of the NHDO TDS utilized CS-1 to purchase a quantity of

Oxycodone pills at **Target Location 2** consistent with the controlled purchase protocol described above. At the conclusion of the controlled purchase, investigators met with CS-1 at a secure location, where CS-1 provided investigators with a knot tied piece of plastic (“corner bag tear”) containing twelve (12) round blue tablets suspected Oxycodone 30 mg and one (1) round pink tablet suspected Oxycodone 10 mg, which CS-1 had purchased from JUAN LNU. CS-1 stated that upon entering **Target Location 2**, VARGAS was also entering the store just ahead of CS-1. CS-1 stated that he/she made contact with LORA who was sitting behind the front counter of **Target Location 2**. CS-1 stated that he/she then proceeded to walk to the rear of the store, as the back door was left opened by VARGAS. CS-1 stated that he/she entered the back room and observed VARGAS, JUAN, and an unidentified male (“UM-2”). CS-1 stated that he/she observed JUAN count out \$2,000 in US Currency, and hand it to VARGAS who left the room immediately thereafter. CS-1 stated that he/she requested "the same as last time" which consisted of 12 (twelve) suspected Oxycodone 30 mg tablets, and one (1) Oxycodone 10 mg tablet, in exchange for \$400 cash. CS-1 stated that UM-2 was seated next to JUAN, and requested to bag up the pills for CS-1. CS-1 stated that he/she observed pre-packaged marijuana in mylar envelopes on the table in front of JUAN. CS-1 stated that he/she inquired as to the status of **Target Location 1** next door, to which JUAN responded that they plan on re-opening **Target Location 1** soon. CS-1 stated that JUAN then handed CS-1 the pills in a knot tied plastic baggie in exchange for the cash.

SURVEILLANCE

Daily Operations of the DTO

30. Investigators have devoted hundreds of man hours to physical surveillance of this DTO, its members, and how they operate on a daily basis. Throughout the duration of this investigation,

law enforcement officers have been able to successfully figure out the operating schedule of this DTO and their associated business fronts. Each morning at approximately 8:30 AM, INDIVIDUAL A and JUAN will leave their residence (formerly 63 Colonial Street apt. A, and now 21 Mountford Street 3rd floor apartment “**Target Location 5**”) on foot carrying a black plastic “bodega bag” with a weighted softball shaped item in it. Typically, INDIVIDUAL A and JUAN will leave their residence at the same time, but will leave distance between themselves in an effort to thwart the surveillance efforts of law enforcement. Although INDIVIDUAL A will usually carry the aforementioned plastic bag containing what is believed to be the store’s daily supply of narcotics, occasionally she will swap the bag on and off with JUAN. INDIVIDUAL A usually holds the keys to open the front door of the business in the mornings; however, prior to doing so, JUAN will conduct counter surveillance in front of, and around, the store on foot in an effort to detect any possible law enforcement officers nearby. Once they deem that “the coast is clear,” INDIVIDUAL A will enter in through the front of the store, proceed to the rear exterior door, and allow for JUAN to enter in the back.

30A. Generally, and as described further below, once INDIVIDUAL A and JUAN arrive at **Target Location 1/Target Location 2** several customers arrive at the store. In some instances, surveillance reveals that these customers have been waiting around the target locations for some time. Upon the arrival of INDIVIDUAL A and JUAN, these customers enter empty handed and, after a short period of time, leave empty handed as well. Based on my training and experience, I know that this behavior is consistent with the sale of illegal narcotics from these and other similar locations.

31. Throughout the past two-three months, INDIVIDUAL A and JUAN have been met in the mornings by VARGAS and UM-2 at the store during the opening time. On several occasions,

VARGAS has been observed by investigators driving laps around the adjacent blocks in a clear effort to detect law enforcement personnel. JUAN and INDIVIDUAL A typically work in **Target Location 1/Target Location 2** until approximately 5:00 PM; at which time (up until the beginning of December 2020) FERNANDEZ-LOPEZ, VARGAS, and LORA would come in and continue the illegal operations throughout the night. Since FERNANDEZ-LOPEZ has not been seen by investigators since the middle of December 2020, URENA has been observed by investigators to be at the stores much more frequently as well as UM-2. The evening hour's narcotics distributions are conducted primarily by VARGAS, since December 2020.

32. **Target Location 1/Target Location 2** usually closes at approximately 9:30 PM with the basic closing procedures taking place: URENA shows up around closing time to pick up the proceeds. VARGAS, UM-2, and LORA shut down all of the lights inside the store and lock the doors. Typically LORA carries a large backpack believed to contain any leftover narcotics away from the store as he proceeds to **Target Location 3** – *NOTE: LORA used to reside in apt. B, however, since JUAN and INDIVIDUAL A moved to Target Location 5, LORA has been observed coming and going at Target Location 3.* VARGAS and UM-2 will either leave on foot, and also proceed to **Target Location 3**, or will occasionally be picked up by URENA or an unidentified female and dropped off at **Target Location 4**. URENA will eventually proceed to his residence located at **Target Location 6**, with the suspected drug proceeds from the day.

Electronic Surveillance (GPS) and the Arrest of Celine Rodriguez-GUERRERO on

December 20, 2020 after a Wall-Off Motor Vehicle Stop

33. On December 19, 2020, at approximately 4:08 a.m., DEA NHDO TDS investigators were alerted via a GPS mounted monitor, of the movement of a white 2016 BMW X3 bearing FL registration Z48IMB (as further described in **Attachment I**), from **Target Location 6**.

Investigators monitored the target vehicle as it proceeded south through Connecticut, New York, New Jersey, Pennsylvania, Delaware, Maryland, Virginia, Kentucky, Tennessee and into North Carolina. The target vehicle briefly stopped at rest stops presumably for fuel along the way, however it was never stationary for a long period of time. Investigators noted that the BMW arrived and stopped in the area of 101-103 Misty Sunset Lane, Flat Rock, NC, at approximately 7:16 p.m. on December 19, 2020. The BMW target vehicle departs 101-103 Misty Sunset Lane at approximately 7:50 p.m. and drives northbound through the night. Based on Investigators' training and experience, this behavior is consistent with the trafficking of narcotics and / or US Currency obtained from the sale of narcotics.

34. On December 20, 2020, at approximately 10:25 a.m., after traveling all night, the BMW target vehicle stopped in Bronx, NY where investigators had already established physical surveillance. TFO Nelson observed the BMW, parked on Saint Nicholas Avenue, NY, NY. TFO Nelson then observed URENA seated in a barber chair, getting a haircut at K4G Unisex Dominican Style Barber Shop, located at 1610 Saint Nicholas Avenue, NY, NY. TFO Nelson maintained surveillance on the BMW while URENA got his haircut. After URENA leaves the barbershop, Investigators maintained surveillance on him as got into the BMW and made several stops throughout the Bronx. TFO Torres observed a white Honda Accord bearing FL Dealer Registration PK723D pull alongside the BMW at one point. TFO Torres observed URENA speaking to an unidentified Hispanic female (UF), later identified as Celine Rodriguez-GUERRERO, who was the operator of the Honda. NOTE: Florida Dealer Registration PK723D comes back to Prestige Broadway LLC., which is owned by URENA out of Orlando, FL.

35. Surveillance was continued after URENA and GUERRERO parted ways. URENA was seen parked, apparently waiting for someone in the area of 2709-2713 Kingsbridge Terrace, Bronx,

NY. URENA proceeded to drive to the area of 5759 Moshulu Ave. in the Bronx, where contact was again reestablished with GUERRERO in the Honda. At approximately 1:44 p.m., investigators observed URENA operating the BMW and GUERRERO operating the Honda in tandem as they proceeded to travel back towards CT. Investigators observed both vehicles pull over at a gas station in White Plains, NY, where they subsequently changed vehicles; GUERRERO was now driving the BMW and URENA was driving the Honda. Surveillance was maintained into CT and a wall-off motor vehicle stop was conducted on GUERRERO operating the BMW by CT State Police.

36. At approximately 4:16 p.m., TFO Garbalosa advised that Trooper Wildman and Trooper Cole, initiated a motor vehicle stop on the BMW. TFO Jason Moss observed the Honda being driven by URENA pull off of the right shoulder approximately one half mile east of the stop. It was later determined that URENA was frequently calling GUERRERO during the traffic stop. While the motor vehicle stop was ongoing, TFO Moss observed URENA stopped along the west bound shoulder of I-84, directly across from the motor vehicle stop. URENA continued to circle on I-84, between exits 17 and 16. Specifically, after stopping ahead of the motor vehicle stop of the BMW, URENA would then drive east to exit 17, get off the highway, get back on the highway westbound, stop across the highway from the motor vehicle stop, drive to exit 16, get off the highway and then get back on the highway eastbound before stopping again ahead of the motor vehicle stop; all in a clear effort to observe the motor vehicle stop. In this way he continued to "circle" the location of the BMW motor vehicle stop numerous times. At approximately 4:30 p.m., Meriden Police K-9 Officer Ficara arrived on scene and deployed K-9 Rex to aid in the detection of illegal drugs and narcotics within the BMW. K-9 Rex indicated a positive "HIT" for the detection of narcotics near the area of the passenger side of the vehicle. A

search of the vehicle by Trooper Wildman and Probationary Trooper Cole, revealed a large hidden compartment underneath the front passenger seat and floor board. Trooper Wildman advised TFO Nelson that he had located a large amount of pills and US Currency hidden within the compartment, subsequently leading to the arrest of GUERRERO.

37. After completing the CSP booking process, RODRIGUEZ-GUERRERO agreed to speak with investigators. TFO Nelson, TFO Verillo, and TFO Garbalosa were present for the interview, which was conducted in an interview room at CSP Troop A, in Southbury, CT. Although she had already been advised of, and signed a notice of rights form as part of the standard CSP booking process, investigators again advised RODRIGUEZ- GUERRERO of her Miranda Rights, which were read from a pre-printed CSP Waiver of Rights form, which RODRIGUEZ- GUERRERO signed. RODRIGUEZ- GUERRERO was not handcuffed, and spoke freely to investigators. GUERRERO then provided a verbal statement, summarized as follows: That she had spent the day with her family, 5715 Mosholu Ave, Bronx, NY. That she later met up with her boyfriend of two years, Rey URENA, who had also been in the Bronx shopping. That she and URENA live together at their newly rented home located at **278 Columbia Blvd. in Waterbury, CT (Target Location 6)**. That URENA runs a bodega in Hartford, CT, although she does not know where it is. That the bodega was, "passed down to him," from his "godfather," whom she does not know. That she is not employed, and considers herself to be a, "stay at home housewife." That URENA makes enough money from his bodega employment that she, "gets whatever she wants," but she does not have further information as to URENA's income stream. That on December 20, 2020, she and URENA had driven in tandem in the white BMW and a white Honda from the Bronx, NY, and heading back towards their residence at **278 Columbia Blvd. in Waterbury, CT (Target Location 6)**. That she was excited to surprise URENA upon arrival

home in Waterbury with a surprise for his birthday, and the two were driving fast because of it. That the vehicle she was driving originally (white Honda) had no windshield washer fluid, and because of road and weather conditions it was difficult for her to see out of the windows, so she and URENA stopped at a rest area and switched vehicles. That she thus began to drive the BMW towards CT, and URENA drove in front of her in the Honda. That she was excited, driving fast, and following too closely behind URENA as the two neared the area where she was eventually pulled over on I-84 East in Middlebury, CT. That URENA called her, alerting her to the fact that a police car had pulled onto the highway behind her, and he began to coach her to avoid being pulled over. That she eventually was pulled over, but URENA told her not to worry because she wasn't doing anything wrong and it would be fine. That the CSP Troopers that stopped her then searched her car, and found drugs and money. That she had no knowledge that there was any drugs, money, or trap compartment in the vehicle. That the BMW is utilized by URENA, who for practical purposes owns it, although she believed the vehicle was registered to his godfather (who investigators believe to be Wilmer SERRANO). That during the motor vehicle stop, URENA continually called her phone over and over, and she had to tell him to stop calling because it was creating an issue. That URENA then began to drive up and down the highway, stopping his vehicle (the white Honda) several times to watch, passing by the motor vehicle stop multiple times watching what was happening.

Probable Cause for Target Locations 3 through 6

37A. The following paragraphs detail the DTO's use of **Target Locations 3 through 6** from the summer of 2020 through May 2021 in furtherance of the DTO's drug trafficking operations.

August 6, 2020

38. The following paragraphs demonstrate that on August 6, 2020 INDIVIDUAL A and JUAN

left **Target Location 3** with the “product,” traveling on foot to **Target Location 1**, and opened the store. This surveillance operation also establishes that when law enforcement arrived at **Target Location 1** JUAN quickly exited the rear of the store and handed off the suspected narcotics/pills to URENA for him to conceal them.

Surveillance on August 6, 2020

39. On August 6, 2020 members of the New Haven District Office (NHDO) Tactical Diversion Squad (TDS) established surveillance in the area of **Target Location 1** as well as in the area of **Target Location 3**. At approximately 8:10 AM, TFO Tessier observed “JUAN” LNU, wearing a white t-shirt, black shorts, black hat, and a black face covering, exit from **Target Location 3**. TFO Verillo maintained surveillance of JUAN as he walked from Colonial Street, to Broad Street, to New Britain Avenue, arriving at **Target Location 1** at approximately 8:20 AM. JUAN is then observed on his cell phone as he walks towards Washington Street. Simultaneously, TFO Verillo observes INDIVIDUAL A wearing peach pants, white shirt, carrying a black satchel bag appear from the alleyway adjacent to **Target Location 1**, also on her phone. TFO Verillo then observed JUAN turn around and walk back towards the store as both he and INDIVIDUAL A hang up their phones. This chain of events led investigators to believe that JUAN and INDIVIDUAL A did not visually see each other which prompted the phone call and that in order for the store to “open,” both parties had to be present, indicating that the store key was with one of them and the “product” was with the other. JUAN is then observed utilizing a key and opening up the front door of **Target Location 1**. Based on TFO Verillo’s observations, it appeared as though JUAN walked to the rear of the store, unlocked the back door, and INDIVIDUAL A entered through the rear, carrying the satchel bag (believed by investigators to contain the illicit narcotics / pills).

40. The store was opened at approximately 8:28 AM, and within the first ten minutes, investigators observed at least a dozen customers (either on foot or in vehicle), enter the store carrying nothing, and exit the store shortly thereafter still carrying nothing. At one point a male customer operating a blue colored Honda CRV, was observed by TFO Verillo placing several loose pills into his pants pocket as he walked out of the store. These observations and behaviors of the customers are indicative of illegal narcotics sales.

41. At approximately 11:25 AM, in an attempt to have JUAN LNU identified, investigators initiated a ruse in conjunction with Hartford Police Department (HPD). HPD Officer Martinez and his partner entered the store and immediately made contact with INDIVIDUAL A at the front counter. Officers indicated that there was a “911 hang-up” call from the area, to which INDIVIDUAL A immediately said that it was not from **Target Location 1**. TFO Tessier had established surveillance in the rear of **Target Location 1** in the event that the Police presence would scare JUAN to exit out of the rear door. Simultaneously as the Officers were walking towards the front door of the store, TFO Tessier observed JUAN quickly exit out of the rear door, indicating that JUAN had observed the Officers approaching via surveillance cameras. TFO Tessier observed JUAN carrying a black colored plastic grocery bag containing a “softball shaped” clump in the bottom of the bag. TFO Tessier then observed a Hispanic male, later confirmed to be URENA, wearing a green colored baseball hat and a “Champion” t-shirt appear at the rear door and meet with JUAN. TFO Tessier observed JUAN hand off the bag to URENA. After TFO Tessier observed the bag hand off from JUAN to URENA, it appeared as though URENA may have entered a white Buick Enclave bearing CT Dealer tag XX187 which had been parked in the rear lot behind the store. Based on TFO Tessier’s physical position, this information could not be confirmed; however, it is likely that the black plastic bag may have

been stored inside this vehicle while the Police were there. As the Officers were walking out of the store, TFO Nelson observed JUAN walking on New Britain Avenue towards Broad Street, distancing himself from the store. Within 30 seconds of the Officers leaving the store, TFO Verillo observed URENA walking from the rear lot towards the front of the store, meets with INDIVIDUAL A at the entrance and goes into the front door of the store. Almost immediately thereafter, TFO Nelson observes JUAN walking back towards the store on his phone. JUAN is observed by TFO Tessier walking down the driveway back towards the rear lot where he again meets with URENA. At this time JUAN and URENA began walking close towards the rear fence line, forcing TFO Tessier to leave his position so that he would not be seen by the targets.

September 17, 2020

42. The below facts and circumstances regarding a surveillance operation on September 17, 2020 identifies FERNANDEZ-LOPEZ during a “wall-off” traffic stop conducted by Bridgeport Police Department. Furthermore, this surveillance operation led investigators to conclude that illicit narcotics/pills and/or cash was being stashed at 40 Alden Street in Hartford, but investigators are not seeking a warrant for that location at this time. Finally, this surveillance operation led investigators to conclude that the below described BMW X3 has a concealed “trap” hidden compartment in, or around, the front passenger’s seat floorboard area.

Surveillance on September 17, 2020

43. On September 17, 2020 members of the New Haven District Office (NHDO) Tactical Diversion Squad (TDS) established surveillance in the area of **Target Location 1**, as well as in the area of 40 Alden Street, Hartford, CT (which is a previously acquired location for which several known, and unknown, targets of this investigation have been confirmed to reside at and possibly use as a “stash” location for narcotics and/or cash). At approximately 5:12 PM, TFO

Nelson and TFO Verillo established surveillance in the rear parking lot located behind 40 Alden Street. Investigators observed a white BMW SUV, recognized to be a vehicle associated with Rey URENA and other targets of this investigation, backed into a parking space behind 40 Alden Street.

44. At approximately 5:34 PM, TFO Pfeiffer and TFO Torres observed **Target Vehicle 1**, exit from the rear lot located behind **Target Location 1**. At approximately 5:38 PM, TFO Verillo observes the Commander arrive at 40 Alden Street and park exactly where vehicles associated with this investigation have parked in the past. TFO Verillo immediately recognized and confirmed the operator to be a UM, later identified as Johnattan FERNANDEZ-LOPEZ. TFO Verillo observed FERNANDEZ-LOPEZ exit the Commander, carrying a black plastic “grocery style” bag which was knotted at the top and clearly had something with weight to it inside the bag. Based on TFO Verillo’s training and experience, as well as the known methods in which targets of this DTO operate, TFO Verillo suspected that the plastic bag contained cash and/or narcotics. TFO Verillo and TFO Nelson then observed FERNANDEZ-LOPEZ enter the apartment door located on the first floor, furthest door to the left side (as viewed from the rear of the complex – suspected to be apt. 103). At approximately 5:59 PM, TFO Nelson and TFO Verillo observe FERNANDEZ-LOPEZ exit the apartment, carrying a large blue colored Wal-Mart reusable style bag. The bag appeared to have a large rectangular shaped item, consistent with that of a large stack of cash, inside. Investigators then observed FERNANDEZ-LOPEZ, holding the bag, get into the operators door of the aforementioned white BMW SUV (license plate later confirmed to be FL registration Z48IMB), despite the fact that he had arrived in **Target Vehicle 1**. For the next 4 minutes, TFO Nelson and TFO Verillo observed FERNANDEZ-LOPEZ sitting in the operator’s seat, holding onto the steering wheel with his left

hand to support his weight, while his entire body was leant over the center console down towards the front passenger's seat floorboard area. Based on training and experience, investigators concluded that FERNANDEZ-LOPEZ was apparently trying to operate a possible "trap" compartment within the vehicle to conceal the Wal-Mart bag and its contents.

45. At approximately 6:05 PM, FERNANDEZ-LOPEZ proceeds to drive the BMW to 65 Steuben Street apartment #14, Bridgeport, CT, while under constant surveillance by members of the NHDO TDS. FERNANDEZ-LOPEZ arrived to said location at 7:00 PM and entered the residence carrying nothing in his hands, as observed by TFO Nelson. At approximately 8:12 PM, TFO Nelson and TFO Torres observed FERNANDEZ-LOPEZ exit the residence and get into the front passenger's seat of the white BMW. Investigators then observed FERNANDEZ-LOPEZ utilizing his cellular phone and also observed him bend over as if he was checking for something under the front passenger's seat. Shortly thereafter, another unknown male exited the residence and got into the operator's seat of the vehicle. At this time the vehicle then drove away and proceeded towards the I-95 South ramp.

46. At approximately 8:15 PM, a Bridgeport Patrol Officer initiated a motor vehicle stop of the white BMW target vehicle on the I-95 South on-ramp for motor vehicle related offense(s). The BPD Officer later advised TFO Verillo that the operator of the vehicle was identified via his CT license as Andres LORA-SIERRA and the passenger was identified via his Dominican Republic ID Card as Johnattan FERNANDEZ-LOPEZ. The Officer advised TFO Verillo that the parties gave consent to search their persons and the vehicle, to which no weapons or contraband was located. The Officer also advised TFO Verillo that he did not locate any blue colored reusable Wal-Mart bag in the vehicle; however, stated that he noticed that one of the front passenger seat bolts was missing and that he observed what appeared to be a plastic "speaker type box"

underneath the seat. The Officer advised TFO Verillo that he attempted to open and/or remove the “speaker type box” from underneath the front passenger’s seat, but was unsuccessful in doing so; therefore, issued a verbal warning for tinted windows to the operator and permitted the parties to leave with no further action taken.

October 15, 2020

47. The below facts and circumstances regarding a surveillance operation on October 15, 2020 relates to the following DTO members: FERNANDEZ-LOPEZ, URENA, and VARGAS, with regards to operational details as well as possible stash locations away from **Target Location 1**. This surveillance operation also led investigators to believe that **Target Vehicle 1** also presumably has a “trap” or hidden compartment within.

Surveillance on October 15, 2020

48. On October 15, 2020, at approximately 3:00 PM members of NHDO TDS established surveillance in the area of **Target Location 1** as well as 40 Alden St, Hartford, CT. TFO Verillo noted that a white BMW SUV bearing FL registration Z48IMB and **Target Vehicle 1** were both parked in the rear parking lot of 40 Alden St, Hartford, CT. Both vehicles are known by investigators to be associated with this DTO. At approximately 3:26 PM, TFO Torres and TFO Tessier observed a black Yamaha sport motorcycle with gold wheels (as further described in **Attachment I**) arrive at **Target Location 1** occupied by driver Rey URENA and passenger Ramon VARGAS. Both URENA and VARGAS entered **Target Location 1**. At approximately 3:38 PM URENA and VARGAS exited **Target Location 1** and mounted the motorcycle. URENA was carrying a black plastic “bodega” bag, knotted at the top. The two then rode to Romny Mini Mart, located at 1892 Broad St, Hartford, CT and entered the store. At approximately 3:48 PM, URENA and VARGAS returned to **Target Location 1** on the motorcycle. TFO Torres noted that URENA no longer held the black plastic “bodega” bag.

48A. At approximately 5:21 PM, TFO Verillo observed FERNANDEZ-LOPEZ exit 40 Alden Street from the 1st floor far left door at the back of the building. FERNANDEZ-LOPEZ carried a brown paper bag, which he appeared to place in **Target Vehicle 1**. FERNANDEZ-LOPEZ then popped the hood of **Target Vehicle 1**, at which point he appeared to remove or inspect the air box cover. FERNANDEZ-LOPEZ then left Alden Street in **Target Vehicle 1**. Members of NHDO TDS maintained constant surveillance on **Target Vehicle 1** as FERNANDEZ-LOPEZ operated it directly to **Target Location 1**, making no further stops and parking directly behind the building. At approximately 5:35 PM, TFO Verillo observed FERNANDEZ-LOPEZ exit

Target Vehicle 1 and enter the rear entrance of **Target Location 1**, carrying with him a backpack, with a smaller bag tucked under his arm.

November 2, 2020

49. The below facts and circumstances regarding a surveillance operation on November 2, 2020 relates to the following DTO members: URENA, FERNANDEZ-LOPEZ, LORA, CABRERA-DEALVAREZ, and VARGAS, with regards to URENA's leadership role within the organization. This surveillance operation also led investigators to conclude that CABRERA-DEALVAREZ, and VARGAS, conducted a re-supply of narcotics to sell within **Target Location 1** during the mid-day time period.

Electronic Surveillance on November 2, 2020

50. On November 2, 2020, at approximately 12:00 p.m., TFO Torres was monitoring the utility pole mounted surveillance camera, which is located across the street from **Target Location 1**. TFO Torres observed a black 2006 Infiniti G35 bearing FL Dealer Registration PK724D emerge from the rear of **Target Location 1** and park along the south side of the building. This vehicle is known to investigators to be operated by Ramon VARGAS. TFO Torres observed the vehicle remain stationary for several minutes. TFO Torres observed INDIVIDUAL A exit the front of the store and enter the passenger side of the vehicle. The vehicle then departs southbound on New Britain Avenue, out of the frame of the camera. At approximately 12:27 PM, TFO Torres observed the aforementioned vehicle return to **Target Location 1** via the utility pole mounted surveillance camera. TFO Torres observed the vehicle stop near the front entrance of the store. TFO Torres observed the vehicle's passenger side door open. TFO Torres observed INDIVIDUAL A exit the passenger side of the vehicle carrying a knotted black plastic "bodega" bag with a weighted softball shaped item in it. Based on TFO Torres training and experience, this

behavior was indicative of a mid-day narcotic re-up supply. TFO Torres observed INDIVIDUAL A walk into the front door of **Target Location 1**.

51. At approximately 10:00 PM, TFO Torres observed LORA and VARGAS exit the front of **Target Location 1**. TFO Torres observed LORA, carrying a large black backpack, lock the front door of the store for the evening. Shortly thereafter, TFO Torres observed **Target Vehicle 1**, operated by FERNANDEZ-LOPEZ, pull up to the front of **Target Location 1**. Through previous surveillance operations, investigators have observed FERNANDEZ-LOPEZ operate **Target Vehicle 1** directly to his residence located at 40 Alden Street Apt. 103, Hartford, CT. On this evening, FERNANDEZ-LOPEZ parked **Target Vehicle 1** on the sidewalk in front of **Target Location 1** and was seemingly waiting for someone to arrive. TFO Torres observed FERNANDEZ-LOPEZ standing outside **Target Vehicle 1** with LORA for several minutes. TFO Torres observed a white BMW X3 bearing FL registration Z48IMB, travel northbound on New Britain Avenue and pull up to the bumper of **Target Vehicle 1**. TFO Torres observed URENA exit the driver side of the BMW. TFO Torres observed VARGAS operating his black Infiniti G35 from the rear of the store. VARGAS is observed parking behind the white BMW and exiting his vehicle. URENA is observed having a conversation with FERNANDEZ-LOPEZ, LORA, and VARGAS in front of the store near **Target Vehicle 1**. It was apparent to investigators that this meeting was called for and conducted by URENA. Based on the training and experience of investigators, URENA's behavior, conduct, and day to day operations, further reveals that he is a supervising member of this Drug Trafficking Organization (DTO).

52. At the completion of the meeting, TFO Torres observed FERNANDEZ-LOPEZ enter the driver side of **Target Vehicle 1**, and URENA enter the driver side of the BMW. The JEEP and BMW depart the area headed northbound on New Britain Avenue, then onto Barnard Street. This

is the route which is utilized on a nightly basis to arrive at 40 Alden Street, Hartford, CT.

VARGAS is observed operating his Infiniti with LORA in the passenger seat, northbound on New Britain Avenue. The Infiniti is observed making a left hand turn onto Washington Street. This is a route commonly utilized by VARGAS to get to 63 Colonial Street, Hartford, CT.

November 3, 2020

53. The below facts and circumstances regarding a surveillance operation on November 3, 2020 relates to the following DTO members: URENA, FERNANDEZ-LOPEZ, LORA, and VARGAS. Furthermore, this surveillance operation demonstrates that the below described F-150, *i.e.* **Target Vehicle 5**, pick-up truck is also equipped with a “trap” hidden compartment. Finally, this surveillance operation helps tie together the closing procedure of **Target Location 1**, as well as the involvement pertaining to **Target Location 3** and **Target Location 4**.

Surveillance on November 3, 2020

54. On November 3, 2020, at approximately 2:30 PM, members of NHDO TDS established surveillance in the area of **Target Location 4** on URENA. At approximately 3:11 PM, TFO Verillo observed a white BMW X3 bearing Florida registration Z48IMB turn onto Rose Ave, West Hartford, CT, having arrived from the direction of Newington, CT along South Street. Rose Avenue reaches a dead end cul-de-sac that abuts the rear parking lot of **Target Location 4**. The white BMW pulled into the cul-de-sac, and parked next to a dark blue Ford F-150 (hereinafter **Target Vehicle 5**), which is another vehicle previously observed by TFO Tessier to be operated by URENA. TFO Verillo observed URENA exit the BMW with his hand in his pocket and enter the driver's seat of **Target Vehicle 5**. URENA rolled **Target Vehicle 5** window down, and began to handle something within the vehicle. URENA then returned to the BMW and entered it, closing the door. After a moment, URENA again exited the BMW and entered **Target Vehicle 5**

a second time, before finally returning to the BMW. It appeared that URENA had transferred an unknown item between the two vehicles, but TFO Verillo was unable to see what, as the location of the parked BMW partially obscured the view of **Target Vehicle 5**.

55. At approximately 9:50 PM, TFO Verillo observed on the pole camera an Infiniti coupe bearing Florida dealer registration PK724D exit the back parking lot of **Target Location 1** heading towards Colonial Street. At 9:53 PM, TFO Torres observed VARGAS park the Infiniti on Colonial Street, walk around to the rear staircase, and ascend the stairs to the second floor, where he entered the apartment on the far eastern side of the building (apartment 63B). At approximately 9:56 PM, TFO Torres observed "JUAN" exit **Target Location 3** briefly, and then return back inside. VARGAS remained inside 63B briefly, and at 10:01 PM, TFO Torres observed VARGAS exit the apartment and return to his vehicle, which he drove away from the area. Moments later, at 10:04 PM, TFO Verillo observed VARGAS arrive at **Target Location 1**, driving the Infiniti into the rear parking lot. At this time, TFO Verillo observed LORA exit the front door of **Target Location 1** and lock it behind him. He then walked to the rear parking lot of **Target Location 1** carrying a black backpack. At approximately 10:06 PM, the Infiniti and a **Target Vehicle 1** each pulled out from the rear of **Target Location 1** into the front parking lot. FERNANDEZ-LOPEZ exited the Jeep carrying a backpack, while VARGAS and LORA exited the Infiniti. The three males met briefly in the front of the store, before re-entering their vehicles and departing the area. The Jeep was driven by FERNANDEZ-LOPEZ east onto Barnard St, towards his residence on Alden Street. The Infiniti was driven by VARGAS directly to 63 Colonial Street. TFO Torres observed as LORA exited the Infiniti at 63 Colonial Street, walked around to the rear staircase, and ascended the stairs to the second floor (63B) carrying the black backpack. VARGAS immediately left the area in the Infiniti. TFO Tessier and TFO Torres

maintained surveillance on the Infiniti as it continued directly to **Target Location 4**, where URENA had remained. Upon arrival there, VARGAS approached the apartment complex, and was observed by investigators making a phone call. Once on the phone, the lobby door was opened electronically, presumably by URENA, and VARGAS entered the building.

December 3, 2020

56. The below facts and circumstances regarding an electronic based surveillance operation on December 3, 2020 establishes that URENA obtained the proper paperwork to facilitate the opening of **Target Location 2**. Furthermore, this surveillance operation demonstrates that URENA conducted a re-supply of narcotics from the Bronx.

Electronic Surveillance on December 3, 2020

57. On December 3, 2020, at approximately 9:10 AM, Investigators were monitoring the aforementioned GPS tracker when they observed URENA's BMW driving from the Hartford area to the area of 22 Henry Street, Manchester, CT. URENA's vehicle was stopped in that area of 22 Henry Street for approximately one (1) minute before returning to Hartford. Then again at approximately 9:51 AM, Investigators observed the vehicle traveling back to the area of 22 Henry Street, where it stopped for one minute before leaving and traveling straight back to **Target Location 1**.

58. At approximately 10:30 AM, TFO Torres observed URENA's white BMW arrive at **Target Location 1** via the pole camera. At this time, TFO Torres was able to positively confirm that the operator was indeed URENA and the front seat passenger was VARGAS. Both URENA and VARGAS exited the vehicle and were observed going into the front door of **Target Location 1** as well as into the front door of 23 New Britain Avenue (*the old "Bobby's Wine and Liquor" location, which is directly next door to Target Location 1 – Later renamed "Prestige Market"*

/ **Target Location 2**). At approximately 10:38 AM, TFO Torres observed URENA get back into the driver's seat of the white BMW and VARGAS get into the rear passenger's seat of the vehicle, leaving the front passenger seat unoccupied. Based on training and experience, specifically as it relates to this investigation; Investigators reasonably believe that the front passenger's seat was purposely left unoccupied in order to provide easier access to the hidden "trap" compartment. Investigators continued to electronically surveil the vehicle via the GPS tracking device, and observed it travel to "Multi-Services International, Inc.," located at 539 Franklin Avenue, Hartford, CT, at approximately 10:45 AM. Multi-Services International, Inc. is the accounting firm that acts as the leasing agent for several of URENA's known LLC's. At approximately 11:25 AM, URENA leaves Multi-Services International and drives directly to the Bank of America located at 790 Maple Avenue, Hartford, CT. Approximately ten (10) minutes later, URENA leaves the Bank and drives directly back to **Target Location 1 / Target Location 2**. At this time, TFO Torres observed URENA exit the BMW carrying a large manila envelope which he takes inside of **Target Location 2**.

59. On this same date, at approximately 4:53 PM, Investigators observed URENA's BMW driving southbound on route 15 towards NY. At approximately 6:00 PM, URENA's BMW parks on Kingsbridge Terrace, Bronx, NY, where it remains for approximately 5-10 minutes, before heading straight back to CT. Based on training and experience, investigators know that this sort of behavior, [[i.e. driving 2 hours all the way from Hartford to the Bronx, just to stay at a location for no more than ten minutes, before heading straight back on another 2 hour drive to Hartford,]] is indicative of illegal behavior with regards to "re-upping" on illicit narcotics. At approximately 8:10 PM, investigators observe URENA's BMW arrive back at **Target Location 1** after coming straight from the Bronx, without stopping. Utilizing the pole camera, TFO Verillo

observed and confirmed, based on physical appearance, clothing worn, and the fact that URENA had been operating the BMW throughout the day that URENA was indeed operating the BMW upon its return from the Bronx.

December 15, 2020

60. The below facts and circumstances regarding a surveillance operation on December 15, 2020 was conducted after INDIVIDUAL A and JUAN moved from **Target Location 3** to **Target Location 5**. This surveillance operation confirmed that although INDIVIDUAL A and JUAN moved their residence, they continued to open **Target Location 1** in the morning and carry the suspected narcotics to the store for distribution.

Surveillance on December 15, 2020

61. On December 15, 2020 members of the NHDO TDS group established surveillance in the area of **Target Location 5**. At approximately 8:07 AM, TFO Nelson observed INDIVIDUAL A and JUAN LNU walk out the front door of the three family residence. INDIVIDUAL A was carrying a black colored plastic grocery bag containing a “softball shaped” weighted clump in the bottom of the bag. TFO Nelson and TFO Verillo maintained surveillance of INDIVIDUAL A and JUAN as they walked on Mountford Street, to Maple Avenue, to Webster Street, and to New Britain Avenue. At approximately 8:17 AM, TFO Verillo observed JUAN unlock and enter the front door of **Target Location 1**. INDIVIDUAL A walked to the rear of the building and at approximately 8:18 AM, TFO Tessier observed JUAN open the rear door for CABRERA-DEALVAREZ, and both parties entered the building.

January 5, 2021

62. On January 5, 2021 surveillance confirmed that VARGAS and LORA were now utilizing **Target Location 3** as a suspected stash location and their residence, and that JUAN and

INDIVIDUAL A had moved to **Target Location 5**. Furthermore, this surveillance operation establishes URENA's leadership role within the DTO as well as the opening of **Target Location 2** as the apparent primary store for distribution of illicit narcotics.

Surveillance on January 5, 2021

63. On January 5, 2021, at approximately 2:00 PM, members of the DEA NHDO TDS established physical surveillance at **Target Location 1**, **Target Location 2**, **Target Location 3**, and **Target Location 5**. At approximately 3:01 PM, TFO Verillo observed an "OPEN" sign in the window of **Target Location 1**. TFO Verillo observed URENA wearing a yellow North Face brand fleece pullover, standing at the front counter of **Target Location 1**.

64. TFO Tessier conducted surveillance of **Target Location 3** as well as 63 Colonial Street apartment B and at approximately 3:27 PM, he observed a Hispanic unknown male and Hispanic unknown female enter 63B Colonial Street. Shortly thereafter, TFO Tessier observes the unknown male bringing an ottoman into Apt. 63B. These individuals are not known to investigators and appear to be new tenants in Apt. 63B.

65. At approximately 3:30 PM, TFO Nelson observed customers entering **Target Location 1**. TFO Nelson observes the customers being instructed to leave **Target Location 1** and go to **Target Location 2**. Customers are observed walking into **Target Location 2** and walk out empty handed. Based on training and experience, investigators know this behavior to be consistent with purchasing illegal narcotics.

66. At approximately 3:40 PM, TFO Tessier observed LORA exit **Target Location 3**, confirming that LORA now resides at **Target Location 3**, and no longer at 63B. **Target Location 3** is JUAN and CABRERA-DEALVAREZ's previous residence. They now reside at **Target Location 5**.

67. At approximately 3:46 PM, TFO Nelson observed URENA exit **Target Location 1** and walk into **Target Location 2**. TFO Nelson observed a large bulge in URENA's left front coat pocket, as if he was attempting to conceal an item. At approximately 4:59 PM, TFO Torres observes URENA's white Honda Accord bearing FL Dealer Registration PK273D, pull into the rear lot of **Target Location 1**. This vehicle is known to be operated by RODRIGUEZ-GUERRERO, URENA's girlfriend. TFO Verillo observed URENA walk over to the Honda and retrieve an unknown item from the vehicle and place it in his pocket, quickly concealing said item. TFO Verillo observes the Honda depart as URENA walks back into **Target Location 1**. At approximately 9:46 PM, TFO Torres observed URENA depart the area of **Target Location 1** in a gray 2017 BMW X3 bearing NY registration JCT6037 (hereinafter "**Target Vehicle 2**"), via the utility pole mounted camera. At approximately 9:50 PM, TFO Verillo observed LORA pulling down the front gate of **Target Location 2**, and closing the store. At approximately 9:55 PM, TFO Nelson observed VARGAS walking on Colonial Street, near Washington Avenue. VARGAS was observed carrying a black garbage bag while walking with UM-2, in the direction of **Target Location 3**. At approximately 10:00 PM, TFO Torres observes VARGAS enter **Target Location 3**, carrying the garbage bag inside the apartment. At approximately 10:10 PM, TFO Torres observed LORA enter **Target Location 3**.

January 7, 2021

68. The below facts and circumstances regarding a surveillance operation on January 7, 2021 relates to the following DTO members: VARGAS, JUAN LNU, and CABRERA-DEALVAREZ. During this surveillance operation, investigators observed JUAN and INDIVIDUAL A exit **Target Location 5** with suspected narcotics, get picked up by VARGAS, and driven to **Target Location 2**. Furthermore, this surveillance operation confirmed **Target Location 4** to be utilized by DTO members.

Surveillance on January 7, 2021

69. On January 7, 2021, members of the NHDO TDS group established surveillance at **Target Location 2, Target Location 3, Target Location 4, and Target Location 5**. At approximately 08:42 AM TFO Torres observed a black Infiniti G35 bearing FL registration PK285J, driven by VARGAS, on New Britain Avenue. At approximately 08:47 AM TFO Tessier observed VARGAS drive onto New Britain Avenue, turn onto Webster Street, Maple Avenue, and turn onto Mountford Street and park in front of **Target Location 5**. TFO Nelson observed JUAN and INDIVIDUAL A exit **Target Residence 5** and enter VARGAS' vehicle. TFO Nelson observed INDIVIDUAL A carry a black plastic bag with a weighted softball sized shaped item from **Target Location 5** into VARGAS' vehicle. At approximately 08:55 AM, TFO Verillo and TFO Torres followed VARGAS' vehicle from Mountford Street to Broad Street and New Britain Avenue until VARGAS turned onto Ellsworth Street and parked. At approximately 09:00 AM TFO Torres observed JUAN walk towards **Target Location 2**; approximately 30 seconds later, INDIVIDUAL A walked towards **Target Location 2**; approximately 30 seconds later, VARGAS walked towards **Target Location 2** and unlocked the front door of the store. JUAN, CABRERA-DEALVAREZ, and VARGAS entered **Target Location 2**.

70. At approximately 09:20 AM members of the NHDO TDS group followed VARGAS in the black Infiniti bearing FL registration PK285J as it drives from Ellsworth Street directly to **Target Location 4**. VARGAS parked his vehicle in the parking lot and entered the building through the rear entry door. At approximately 09:40 AM TFO Nelson entered the common rear unsecured entrance to the apartment building, disguised as an Amazon delivery person, and proceeded to walk to apartment B2 (**Target Location 4**), where he heard loud music playing from the apartment. At approximately 09:48 AM, TFO Verillo placed a phone call into VARGAS' known cellular number.² TFO Verillo heard VARGAS answer the phone and say "hello" multiple times. Simultaneously, TFO Nelson stood outside the door of **Target Location 4** and heard the loud music stop playing and a male party say "hello" multiple times. Both TFO Nelson and TFO Verillo immediately recognized the voice that answered the phone to be VARGAS' voice based on comparing it to dialect heard during prior controlled purchases.

January 11, 2021

71. The below facts and circumstances regarding a surveillance operation on January 11, 2021 establish that JUAN LNU and INDIVIDUAL A reside together at **Target Location 5**.

Surveillance on January 11, 2021

72. On January 11, 2021, members of the NHDO TDS group established surveillance at **Target Location 5** and **Target Location 2**. At approximately 6:08 PM TFO Tessier observed JUAN LNU and INDIVIDUAL A exit **Target Location 2** and walk towards Webster Street. TFO

² Investigators were able to confirm VARGAS' cellular phone number after an analysis of phone toll records of Rey URENA's known phone number, which was later corroborated by Celine RODRIGUEZ-GUERRERO's statement after her arrest in which she stated that her brother, Ramon VARGAS, would pick her up from the station and provided Officers with VARGAS' phone number which matched the number investigators had already suspected to be utilized by him.

Verillo and TFO Cagianello observed JUAN and INDIVIDUAL A walking on Webster Street continue on Maple Avenue and turn onto Mountford Street. At approximately 6:23 PM TFO Tessier observed JUAN and INDIVIDUAL A enter the rear entrance of **Target Location 5**. Approximately two minutes later TFO Tessier observed a male party exit a door on the third floor which leads to an enclosed porch. The male party was on the rear enclosed porch for approximately two minutes until he exited the porch through the door he entered in, apparently going back in to the apartment. Based on TFO Tessier's observations, this male appeared to be JUAN. At approximately 6:27 PM TFO Verillo observed lights turn off and on of the third floor of the apartment building.

January 18, 2021

73. The below facts and circumstances regarding a surveillance operation on January 18, 2021 further establish that JUAN LNU and INDIVIDUAL A reside together at **Target Location 5**. Furthermore, this surveillance operation solidifies the criminal conspiracy amongst URENA and VARGAS. Finally, this surveillance operation led investigators to follow URENA from **Target Location 2 / Target Location 3**, to a suspected narcotic re-up in the Bronx, NY, and ultimately traveling back to URENA's residence at **Target Location 6**.

Surveillance on January 18, 2021

74. On January 18, 2021 members of the NHDO TDS group established surveillance in the area of **Target Location 2** and **Target Location 5**. At approximately 6:23 PM TFO Nelson observed JUAN and INDIVIDUAL A walking away from **Target Location 2** and turn right onto Webster Street. Both parties continued to walk onto Maple Avenue and enter Bravo Supermarket (685 Maple Avenue, Hartford, CT). JUAN and INDIVIDUAL A exited Bravo Supermarket and

walked to Mountford Street where TFO Tessier observed them enter **Target Location 5** through the rear entrance at 6:30 PM.

75. At approximately 7:57 PM TFO Nelson observed through a third floor window of **Target Location 5**, a male party, who appeared to be JUAN wearing a white shirt, walk past the window. At approximately 8:19 PM TFO Verillo observed the same male party through the window on the third floor of **Target Location 5**. TFO Verillo also confirmed that the male party appeared to be JUAN and was observed moving between what appeared to be the kitchen and living room of **Target Location 5**. During this time, TFO Verillo also observed a Hispanic female who appeared to be INDIVIDUAL A in the living room area of **Target Location 5**.

76. At approximately 8:40 PM TFO Torres observed an unidentified male (UM) and VARGAS lock the front gates of **Target Location 2**. At approximately 8:44 PM TFO Torres observed a gray BMW SUV pull into the rear of **Target Location 2**. TFO Tessier observed the gray BMW's registration was NY registration JCT6037 which is registered to a "Ramon Urena." Members of NHDO TDS group have observed Rey URENA operate this vehicle. At approximately 8:49 PM TFO Tessier observed the gray BMW exit the rear of **Target Location 2** and drive to the Gulf Gas Station located at 145 New Britain Avenue, Hartford, CT. TFO Nelson observed and confirmed URENA exiting the driver's seat of the gray BMW, bearing NY Registration JCT6037, and proceed to pump gas. At approximately 8:55 PM URENA exited the gas station and drove directly to the rear parking lot of **Target Location 3**. At approximately 9:02 PM TFO Tessier observed URENA exit the rear parking lot of **Target Location 3** and street park in front of the apartment building. It is to be noted that VARGAS' Black Infiniti G35 bearing FL registration PK285J was also street parked in front of **Target Location 3**. At approximately 9:06 PM TFO Tessier observed URENA take a right onto Broad Street, right onto Brownell Avenue,

right onto Washington Street, left onto Barnard Street, right onto Maple Avenue, left onto Bond Street, right onto Franklin Avenue, left onto Preston Street, right onto Wethersfield Avenue, left onto Airport Road, and right onto I-91 South. Members of the NHDO TDS group maintained constant surveillance on URENA on I-91 South to I-95 South to I-95 South Exit 1C onto RT 87 North. URENA continued on RT 87 North until Exit 9 onto West Fordham Road, continued straight onto East Fordham Avenue, left onto Morris Avenue, and right onto East 191st Street. URENA parked in the area of 50 E 191st Street at approximately 10:43 PM. At approximately 10:59 PM TFO Verillo observed multiple unidentified males approach URENA's driver's side door, and interact with URENA while he remained in the driver's seat. Although TFO Verillo did not have a vantage point to see what exactly transpired, he knows from his training and experience that narcotics dealers will often meet others for short durations of time in remote locations as to conceal themselves from law enforcement officers. Shortly thereafter, the UM's walked away from URENA's vehicle, and URENA drove away from his parking spot. TFO Verillo observed URENA stop at the intersection of E 191st Street and Creston Avenue for approximately two minutes possibly storing an item in a "trap" or hidden compartment within his vehicle, before taking a right onto Creston Avenue. URENA then took a right onto East Fordham Avenue and drove away at a high rate of speed, and members of the NHDO TDS group were unable to maintain constant surveillance; however, noted that if it was indeed a drug re-up supply, that URENA would probably be heading straight back to his residence at **Target Location 6**. TFO Torres traveled directly to **Target Location 6**, where members of NHDO TDS expected URENA to arrive. TFO Torres arrived at approximately 12:51 AM on 01/19/21, at which point he observed **Target Vehicle 2** parked in the driveway of the residence, indicating that URENA proceeded home after the suspected re-up in the Bronx, NY.

February 8, 2021

77. The below facts and circumstances regarding a surveillance on February 8, 2021 confirmed another motor vehicle operated by URENA as well as pertinent confirmation that URENA travels to **Target Location 6** after his suspected cash/proceeds pick-up from the store. This surveillance operation also solidified the fact that the DTO still maintains and controls **Target Location 1**.

Surveillance on February 8, 2021

78. On February 8, 2021, at approximately 8:45 p.m., TFO Torres was monitoring the utility pole mounted camera which is located in the area of **Target Location 1 / Target Location 2**. TFO Torres observed a red Jeep Grand Cherokee bearing FL Dealer registration PK285J (herein after **Target Vehicle 4**), parked in front of **Target Location 2**. Investigators are familiar with the dealer registration plate as it was previously mounted to **Target Vehicle 1** which was observed throughout numerous surveillance operations being driven by members of this DTO. TFO Torres observed the unknown operator of **Target Vehicle 4** backing the vehicle down the driveway, near the entrance of **Target Location 1**. TFO Torres observed an unknown male exit **Target Location 2** and walk over to **Target Location 1**. TFO Torres observed a separate unknown male wearing black clothing, apparently unlocking the front door of **Target Location 1**, and enter the establishment. Approximately 20 minutes later, TFO Torres observed an unknown male exit **Target Location 1** and walk into **Target Location 2**.

79. Over the previous several months, investigators have received LPR (license plate reader)³

³ A License plate reader (LPR) is an automated system that observes and collects license plate information from nearby vehicles; often capturing a photograph of the license plate and the vehicle to which it is affixed. LPR systems can be configured to generate automated alerts (and send said alerts to law enforcement personnel) when a particular plate is captured by the system.

hits from NYC regarding **Target Vehicle 4** with the aforementioned registration plate affixed; however, it was unknown to investigators who was operating said vehicle. Investigators formulated a plan to conduct physical surveillance on the vehicle and have a Hartford Police Department marked unit conduct a motor vehicle stop and identify the operator in the process. TFO Cagianello and TFO Moss arrived in the area and located the red Jeep backed in alongside **Target Location 1**. Investigators reached out to the Hartford Police Department and arrangements were made for patrol units to stage in the area for a motor vehicle stop. At approximately 9:50 PM, TFO Torres observed via the pole mounted camera, an individual wearing a gray hooded sweatshirt, later determined to be URENA, exit **Target Location 2** and begin walking down the driveway adjacent to **Target Location 1**. A short time later, TFO Torres observed **Target Vehicle 4** emerge from the rear lot of **Target Location 1**. TFO Torres advised investigators that the vehicle had exited the driveway and proceeded southbound on New Britain Avenue, headed towards Broad Street. TFO Cagianello advised investigators that he was behind the target vehicle and that marked Hartford Police Department cruisers were observed nearby. TFO Cagianello, TFO Moss, and TFO Verillo continued mobile surveillance until Officer Pino of the Hartford Police Department initiated a motor vehicle stop at approximately 10:03 PM, on Brookfield Street, and Flatbush Avenue, Hartford, CT. Officer Pino successfully identified the operator of **Target Vehicle 4**, as Rey URENA. URENA was issued a verbal warning for a motor vehicle violation. Mobile surveillance was maintained post motor vehicle stop and the Jeep operated by URENA was observed entering the Interstate 84 West on ramp. At approximately 10:33 PM, TFO Torres and TFO Nelson set up surveillance in the area of **Target Location 6**. TFO Torres observed **Target Vehicle 4**, with the engine running and headlights illuminated, back into the driveway of **Target Location 6** with URENA still seated in the

driver's seat. TFO Torres observed URENA exit the vehicle and walk into the front door of **Target Location 6**.

March 3, 2021

80. The below facts and circumstances regarding a surveillance operation on March 3, 2021 confirmed another motor vehicle operated by URENA as well as pertinent confirmation that URENA travels to **Target Location 6** after his suspected cash/proceeds pick-up from the store.

Surveillance on March 3, 2021

81. On March 3, 2021, at approximately 10:00 PM, TFO Torres was monitoring the utility pole mounted surveillance camera which is pointing in the direction of **Target Location 1 / Target Location 2**. At approximately 10:03 PM, TFO Torres observed UM-2, who as described above is known by investigators to be a member of this DTO, exit **Target Location 2** and quickly walk towards the rear lot of **Target Location 1**. UM-2 was carrying a box or bag under his right arm, which appeared to be heavy in weight. At approximately 10:04 PM, TFO Torres observed UM-2 walking back towards the front of **Target Location 2**, now empty handed. As UM-2 approached the front of the store, TFO Torres observed a newer model black BMW M3 (hereinafter **Target Vehicle 3**) sedan emerge from the rear lot of **Target Location 1**. The BMW has dark tinted windows and appeared to be the same vehicle that Investigators had observed URENA operating two days prior. TFO Torres observed the BMW leave the lot of **Target Location 1** and proceed southbound on New Britain Avenue, out of the frame of the camera.

82. At approximately 10:33 PM, TFO Torres set up physical surveillance at **Target Location 6**. At approximately 10:42 PM, TFO Torres observed **Target Vehicle 3** pull into the driveway of **Target Location 6**. TFO Torres observed URENA exit the driver's door of the BMW as another unknown male exited the passenger side of the vehicle. TFO Torres observed URENA walk

around to the passenger side of the vehicle and retrieve an item from the floor board and / or glove box area of the car. Based on training and experience, specifically as it relates to this investigation, investigators know that URENA's vehicle's often have "trap" hidden compartments within the front passenger's side floorboard areas. TFO Torres then observed URENA walking into **Target Location 6**, carrying a weighted bag in his right hand. TFO Torres noticed that the contents of the bag, caused the edges of the bag to appear squared, causing TFO Torres to believe that this was the same item that UM-2 had presumably brought out to URENA's vehicle from **Target Location 2**. Based on training and experience, Investigators know that leaders within drug distributing organizations will often be the person responsible for handling the cash proceeds earned from the criminal acts.

March 10, 2021

83. The below facts and circumstances regarding a surveillance operation on March 10, 2021 establish that URENA and UM-2 conducted a mid-day cash/narcotic pick-up from **Target Location 2** and returned it to **Target Location 3**.

Surveillance on March 10, 2021

84. On March 10, 2021, at approximately 11:00 AM, members of the DEA NHDO TDS established physical surveillance in the areas of **Target Location 2** and **Target Location 3**. At approximately 11:30 AM, TFO Torres observed **Target Vehicle 4**, parked in the rear lot of **Target Location 3**, occupied by two male parties. TFO Torres observed URENA exit the driver's seat of the vehicle and UM-2 exit the passenger's seat. At approximately 11:31 AM, TFO Torres observed URENA and UM-2 walk up to and enter the rear door of **Target Location 3**. At approximately 11:32 AM, TFO Torres observed URENA and UM-2 exit **Target Location 3** and get back into **Target Vehicle 4**. At this time the Jeep drove away from **Target Location 3**

and travelled directly to the **Target Location 1** lot. At approximately 11:37 AM, TFO Nelson observed UM-2 exit the passenger side of the red Jeep, and walk into **Target Location 2**. At approximately 11:40 AM, TFO Torres observed UM-2 exit **Target Location 2** carrying a black shopping bag in his right hand, via the utility pole mounted camera. TFO Nelson observed UM-2 placing the bag in the front passenger's seat floorboard area. UM-2 then entered the vehicle. At approximately 11:41 AM, TFO Torres observed the red Jeep pull out of the driveway adjacent to **Target Location 1** and proceed north on New Britain Avenue, via the pole mounted camera. Investigators maintained constant surveillance on the vehicle as it proceeded back to **Target Location 3**. At approximately 11:45 AM, TFO Torres observed URENA and UM-2, who was carrying the aforementioned black shopping bag, exit the red Jeep and walk towards the rear entrance of **Target Location 3**. TFO Torres observed URENA pull out a set of keys from his pocket and unlock the door to **Target Location 3**. In my training and experience this, along with the other facts of the case, tend to demonstrate that **Target Location 3** is a stash location as URENA does not live at that location, but nonetheless has keys to it. TFO Torres observed both URENA and UM-2 enter **Target Location 3** with the bag. At approximately 12:19 PM, TFO Torres observed VARGAS walking into the rear door of **Target Location 3**.

March 30, 2021

85. On March 30, 2021 surveillance was conducted on **Target Location 2**, **Target Location 3**, **Target Location 4**, and **Target Location 6**. This surveillance operation solidifies the criminal conspiracy between URENA, VARGAS, JUAN LNU, LORA, and UM-2. Finally, this surveillance operation puts together many of the procedural moving parts associated with how this DTO operates.

Surveillance on March 30, 2021

86. On March 30, 2021, at approximately 6:02 PM, members of NHDO TDS established surveillance in the area of **Target Location 2** and **Target Location 3** in support of a planned controlled purchase operation at **Target Location 2**. At this time, surveillance team members became aware that the Hartford Police Department had an unrelated motor vehicle stop ongoing on New Britain Avenue in the area of **Target Location 2**. Investigators are aware from prior surveillance operations that members of the DTO generally refrain from serving illegal drugs to customers if there is a police presence in the area, oftentimes removing any illegal drug stashes from the store entirely until the police presence is gone.

87. At approximately 6:04 PM, TFO Pfeiffer observed VARGAS and URENA arrive at **Target Location 3**, entering the apartment via the rear entrance. At approximately 6:10 PM, TFO Verillo observed **Target Vehicle 3** bearing NY registration KLD4439 parked on Colonial Street in front of **Target Location 3**. At approximately 6:14 PM, TFO Pfeiffer observed URENA exit **Target Location 3** carrying a white plastic bag with a weighted object inside. URENA placed the bag inside of **Target Vehicle 1** that is parked in the rear of **Target Location 3**. Investigators are aware that this specific Jeep has long been utilized by members of this DTO. At approximately 6:15 PM, TFO Pfeiffer observed VARGAS exit **Target Location 3**. URENA and VARGAS then walked towards the front of the building and got into **Target Vehicle 3**, with URENA operating and VARGAS in the passenger seat.

88. At approximately 6:16 PM, TFO Verillo and TFO Tessier maintained moving surveillance on **Target Vehicle 3** as it traveled directly to **Target Location 2**, parking in the alleyway aside the store. At approximately 6:18 PM, TFO Tessier observed VARGAS entering **Target Location 2**, while URENA waited outside in **Target Vehicle 3**. At approximately 6:22 PM, URENA was observed exiting the alleyway next to **Target Location 2** in **Target Vehicle 3**.

TFO Tessier observed as URENA circled the block, eventually parking on Ellsworth Street.

89. At approximately 6:23 PM, **CS-1** entered **Target Location 2** during the aforementioned controlled purchase operation. **CS-1** later reported during a debrief that upon entering the back room of **Target Location 2**, where illegal drugs are commonly sold, he/she observed JUAN LNU count out approximately \$2,000 in US currency and hand it to VARGAS. **CS-1** reported that upon receiving the cash, VARGAS then left **Target Location 2**. At approximately 6:25 PM, TFO Tessier observed VARGAS walk away from **Target Location 2**, heading towards Ellsworth Street. Moments later, VARGAS entered **Target Vehicle 3** which was still occupied by URENA, and **Target Vehicle 3** left the area. Surveillance was maintained in the area until the conclusion of the controlled purchase operation at approximately 6:35 PM. At that time, surveillance was suspended.

90. At approximately 8:57 PM, members of NHDO TDS reestablished surveillance in the area of **Target Location 2** as well as at **Target Location 6**. At approximately 9:55 PM, UM-2 exited **Target Location 2**, and entered **Target Vehicle 5**. At 9:57 PM, LORA exited the front door of **Target Location 2**, closing and locking the roll-up door behind him. LORA then entered the passenger side of **Target Vehicle 5**, which left the parking lot moments later. TFO Moss, TFO Tessier, and TFO Verillo maintained constant surveillance on **Target Vehicle 5** as it traveled to the area of 49-53 Curtiss Street, Hartford, CT. TFO Verillo observed as LORA exited **Target Vehicle 5** walking down the driveway in between the residences located at 49/51 Curtiss Street and 53 Curtiss Street. LORA was carrying a black plastic shopping "bodega" bag with a small, round, weighted object inside of it. LORA was last seen in the driveway at approximately 10:02 PM.

91. **Target Vehicle 5**, now operated by UM-2, left Curtiss Street at approximately 10:03

PM. TFO Moss, TFO Tessier, and TFO Verillo maintained constant surveillance on **Target Vehicle 5** as it traveled directly to **Target Location 4**, arriving at approximately 10:08 PM. UM-2 parked **Target Vehicle 5** along the adjacent Rose Street, and was last seen in the vicinity of the front of **Target Location 4**, at approximately 10:09 PM.

92. At 10:09 PM, investigators received a real-time License Plate Reader alert for **Target Vehicle 4**, which was traveling northbound on the Hutchinson River Parkway in the area of Scarsdale, NY. Investigators are aware that **Target Vehicle 4** has been utilized by URENA and other members of this DTO, who are known to use vehicles with "trap" hidden compartments to transport illegal drugs from the State of New York to the state of Connecticut to re-sell.

93. At approximately 11:18 PM, TFO Nelson and TFO Torres, observed **Target Vehicle 3**, operated by URENA, and **Target Vehicle 4** operated by VARGAS, arrive at **Target Location 6**. From approximately 11:19 PM through approximately 11:21 PM, URENA and VARGAS each accessed the passenger side area of **Target Vehicle 4**, as if attempting to remove items from it. VARGAS then walked away from **Target Vehicle 4** carrying a small weighted object with squared off sides concealed in a black plastic bag in his right hand. Based on training and experience, investigators believed this item to be a stack of cash based on the size and shape of the item. VARGAS carried the bag directly inside **Target Location 6**, immediately followed by URENA. At 11:23 PM, URENA exited the residence, re-entered **Target Vehicle 4**, turning on all of the vehicle's lights. URENA then exited **Target Vehicle 4**, and walked over to a yellow Volkswagen Bug (herein after **Target Vehicle 6**) that was parked in front of the residence on the street. Investigators are aware that **Target Vehicle 6** has previously been utilized by members of this DTO. URENA removed a white plastic bag from **Target Vehicle 6** and carried it directly into **Target Location 6**. At approximately 11:30 PM, VARGAS departed **Target Location 6**,

operating **Target Vehicle 6**.

April 1, 2021

94. On April 1, 2021 surveillance was conducted on **Target Location 1**, **Target Location 2**, **Target Location 4**, and **Target Location 5**. This surveillance operation confirms how the DTO opens **Target Location 2** for business in the morning.

Surveillance on April 1, 2021

95. On April 1, 2021, at approximately 8:30 AM, members of NHDO TDS established surveillance in the area of **Target Location 2**, **Target Location 4**, and **Target Location 5**. At approximately 9:00 AM, TFO Torres observed VARGAS and UM-2 exit the front door of the **Target Location 4** building. VARGAS and UM-2 enter an older model blue Ford F150 bearing CT paper registration U079474. Investigators are aware that this older model blue Ford F150 is utilized by members of this DTO. TFO Torres and TFO Verillo observed VARGAS and UM-2 drive directly from **Target Location 4** to **Target Location 2**. VARGAS and UM-2 proceed to unlock the roll-up storefront gates of **Target Location 2** and enter the store.

96. At approximately 9:19 AM, TFO Tessier observed INDIVIDUAL A walk out of **Target Location 5**. INDIVIDUAL A was carrying a black satchel bag slung over her left shoulder. TFO Tessier observed INDIVIDUAL A walk from Mountford Street onto Maple Avenue. TFO Verillo observed INDIVIDUAL A walk from Maple Avenue onto Webster Street. TFO Torres observed INDIVIDUAL A walk from Webster Street onto New Britain Avenue. TFO Tessier observed INDIVIDUAL A walk on New Britain Avenue directly into **Target Location 2** at approximately 9:27 AM.

97. Members of the NHDO TDS group maintained surveillance of **Target Location 2**, after the store had been opened for business by VARGAS, UM-2, and CABRERA-DEALVAREZ.

Within moments of being opened, investigators observed numerous customers entering the store carrying nothing in their hands and exiting shortly thereafter still carrying nothing in their hands. Based on training and experience, investigators recognized this behavior to be indicative of illegal narcotics sales.

98. On this same date, TFO Tessier was conducting electronic surveillance of **Target Location 1 / Target Location 2** utilizing the aforementioned utility pole mounted surveillance camera. At approximately 3:09 PM, TFO Tessier observed VARGAS exit **Target Location 2** and walk directly into **Target Location 1**.

April 15, 2021

99. On April 15, 2021, Members of NHDO TDS conducted surveillance on **Target Location 2** and **Target Location 4**. The surveillance established UM-2 leaving in **Target Vehicle 5** from **Target Location 2**, engaging in counter surveillance techniques, prior to parking **Target Vehicle 5** in the vicinity of **Target Location 4** and then entering the building in which **Target Location 4** is located.

Surveillance on April 15, 2021

100. On this date, surveillance observed UM-2 and LORA close **Target Location 2** in typical fashion. UM-2 entered the driver seat of **Target Vehicle 5**, which was parked outside, and LORA entered the front passenger seat. Surveillance was maintained on the vehicle as it proceeded to drive to 49 Curtiss Street, where LORA exited the vehicle. LORA was observed unlocking and entering the side entrance of the residence. Surveillance continued on **Target Vehicle 5**, which ultimately parked on Rose Street, near the parking lot behind **Target Location 4**. After sitting in the vehicle for approximately 5 minutes with no one entering or leaving the vehicle, **Target Vehicle 5** left that location and proceeded to drive to a McDonalds and obtained

food in the drive-through. **Target Vehicle 5** then parked in a nearby parking lot before returning to Rose Street in the vicinity of **Target Location 4**. **Target Vehicle 5** parked again on Rose Street for approximately 5 minutes. While **Target Vehicle 5** was parked, TFO Nelson was able to look through binoculars into the apartment window of **Target Location 4** and observed VARGAS holding what TFO Nelson knows through his training and experience to be a large “bong,” which is commonly used to smoke marijuana. After five minutes **Target Vehicle 5** left the area a second time and began to engage in a series of random turns, and brief stops at various locations on side streets in the vicinity of **Target Location 4**, in a clear effort to thwart law enforcement surveillance efforts. Eventually **Target Vehicle 5** parked a third time on Rose Street. TFO Verillo observed UM-2 moving around inside **Target Vehicle 5** – consistent with movements investigators would expect to see in accessing a trap – before emerging from the vehicle at which point UM-2 entered the front door of the building in which **Target Location 4** is located. It was too dark to see what, if anything, UM-2 carried as he entered the building.

April 27, 2021

101. The below facts and circumstances regarding a surveillance operation on April 27, 2021 establishes that INDIVIDUAL A continues to bring narcotics from **Target Location 5** to **Target Location 2** for sale.

Surveillance on April 27, 2021

102. Members of the NHDO TDS set up surveillance in the area of Mountford Street, Maple Avenue, Broad Street, and New Britain Avenue in Hartford, Connecticut at approximately 8:00 AM. At approximately 8:58 AM, INDIVIDUAL A exited **Target Location 5** through an enclosed porch wearing Black & White sneakers, blue jeans, blue jean jacket with a white hooded sweatshirt underneath, carrying a black satchel over her upper torso. Members of NHDO

TDS maintained constant surveillance of INDIVIDUAL A as she walked on Mountford Street to Broad Street. While on Broad Street, INDIVIDUAL A entered a covid testing center and then a laundromat located down the street from **Target Location 2**.

103. At approximately 9:14 AM, TFO Torres observed VARGAS and UM-2 exit **Target Location 4** and get into **Target Vehicle 5**. VARGAS and UM-2 drive directly to **Target Location 2**. Once they arrive, UM-2 exited the driver's side of the vehicle and used a key to unlock the front gate of **Target Location 2**. Shortly after UM-2 unlocked the front gate, he and VARGAS entered. Surveillance members observed a number of customers, who had been "hovering" in the area, enter the store behind UM-2 and VARGAS, and did not leave. Around the same time, INDIVIDUAL A exits the laundromat wearing the same clothing as mentioned above, and still carrying the black satchel bag around her upper torso.

104. Once INDIVIDUAL A enters **Target Location 2**, the same customers who entered the location when it opened begin to exit approximately 1 minute and 30 seconds later. These customers do not exit with any merchandise in their hands and commonly exit with their hands in their pockets, indicating that INDIVIDUAL A had been in the possession of the "product."

April 28, 2021

105. On April 28, 2021, Members of NHDO TDS conducted surveillance on **Target Location 2, Target Location 5, and Target Location 4**. The surveillance established that the proceeds/ and or the drugs themselves that had been at **Target Location 2** during the day were taken both to **Target Location 5** and **Target Location 4**.

Surveillance on April 28, 2021

106. Surveillance on **Target Location 2** in the evening observed the store close. JUAN was not seen leaving the front of store but appeared from the rear of the store on Maple Street –

presumably leaving from the back door of the store. He had on his person two black bags that had larger objects with squared-off corners, consistent with what would be cash. He proceeded to walk directly to **Target Location 5**.

107. Surveillance on **Target Location 2** also observed UM-2 leave the front of the store carrying a black bodega bag with a soft-ball shaped weighted object in it. UM-2 entered **Target Vehicle 5**. He proceeded to drive to Colonial Street, where **Target Vehicle 5** stopped briefly in front of **Target Location 3**, but surveillance was unable to see whether anyone entered the vehicle. **Target Vehicle 5** was then observed driving directly back to **Target Location 2** where LORA was locking the front gate. LORA entered the passenger seat of **Target Vehicle 5** and **Target Vehicle 5** drove directly to 49 Curtiss Street where LORA exited the vehicle and investigators observed him entering the side door of the residence. **Target Vehicle 5** then drove and parked in the rear of **Target Location 4**. TFO Torres observed UM-2 exit the driver's seat of **Target Vehicle 5** carrying the black bodega bag with a soft-ball shaped weighted object in it from the vehicle into the rear door of the building in which **Target Location 4** is located.

May 5, 2021

108. On May 5, 2021, Members of NHDO TDS conducted surveillance on **Target Location 1**, **Target Location 2**, **Target Location 3**, **Target Location 4**, and **Target Location 5**, all of which remain in use by the DTO.

Surveillance on May 5, 2021

109. During the morning hours on May 5, 2021, surveillance drove past **Target Location 4** and TFO Verillo observed **Target Vehicle 5** and **Target Vehicle 6** to be parked in the lot behind **Target Location 4**. Investigators know that members of the DTO regularly utilize both of these vehicles. Surveillance in the morning also observed INDIVIDUAL A leave **Target Location 5**

and begin to make her way towards **Target Location 2** carrying her normal satchel bag. At **Target Location 2**, surveillance saw **Target Vehicle 5** arrive and park in front of **Target Location 2** and **Target Vehicle 6**, following **Target Vehicle 5** in tandem, also arrive and pull into the rear lot of **Target Location 1**. UM-2 exited the driver's seat of **Target Vehicle 5** and VARGAS appeared from the alleyway between **Target Location 1** and **Target Location 2** and met with UM-2. Together they opened **Target Location 2**. While this was happening, investigators observed INDIVIDUAL A watching from a distance, but not approaching UM-2 and VARGAS as they opened the store. Once the store was opened, INDIVIDUAL A approached and followed UM-2 and VARGAS into the store. At that point, customers entered **Target Location 2** empty-handed and soon after began leaving the premises empty-handed as well, which, as described above, is indicative of narcotic trafficking.

110. At approximately 10:00 AM surveillance efforts transitioned to 51-49 Curtiss Street where Jose LORA is now believed to reside. Investigators observed LORA exit the side door of 51-49 Curtiss Street as he proceeded to throw out a garbage bag, before going back inside. Shortly thereafter, LORA then exited again, carrying a small black Nike satchel bag and he proceeded to walk directly from 51-49 Curtiss Street to **Target Location 2**.

111. Later in the day, investigators set up surveillance at **Target Location 3**. Surveillance observed **Target Vehicle 6** described above parked on the street in front of that location. Surveillance also observed **Target Vehicle 4** parked in the lot behind **Target Location 3**. This vehicle is known by investigators to be regularly operated by URENA. At this time, TFO Torres and TFO Nelson observed VARGAS exit and reenter **Target Location 3**.

May 10, 2021

112. On May 10, 2021, Members of NHDO TDS conducted surveillance on **Target Location 2**

and **Target Location 6**, both of which remain in use by the DTO.

Surveillance on May 10, 2021

113. On May 10, 2021, members of NHDO TDS received LPR hits indicating that **Target Vehicle 4** travelled from Connecticut to New York City, remained there for approximately 45 minutes, and returned to Connecticut. Based on my training and experience and the facts of this investigation, I believe this to be consistent with a “re-upping” of drug supply. While the vehicle was en-route back to Connecticut, surveillance was established at **Target Location 2** (via polecam) and **Target Location 6**. Surveillance at **Target Location 2** revealed **Target Vehicle 4** pull directly in front of **Target Location 2**, with the driver’s side door directly across from the entrance to **Target Location 2**. URENA was confirmed to be the operator and he remained in the driver’s seat of **Target Vehicle 4**. UM-2 immediately exited **Target Location 2** to meet with URENA. The two were observed greeting each other and interacting for less than sixty seconds. After the meeting, UM-2 returned inside of **Target Location 2** and URENA departed the area. Investigators were unable to determine whether anything was exchanged between URENA and UM-2 during their interaction.

114. A short time later, surveillance at **Target Location 6** observed URENA arrive in **Target Vehicle 4**. After parking on the roadside directly in front of **Target Location 6**, URENA exited the vehicle and walked around to the rear passenger side, where he removed a large black backpack that was clearly full. URENA then returned to the driver’s side, and began to manipulate the lights of the vehicle and lock and unlock the door repeatedly utilizing his key fob. Based on my training and experience and the facts of this investigation, I know this to be consistent with URENA accessing a “trap” inside of **Target Vehicle 4**. URENA then walked to the passenger side of **Target Vehicle 4**, and opened the front passenger door and reached into

the vehicle, where investigators observed him “fidgeting” – consistent with accessing a “trap” below the front passenger seat – before exiting the vehicle, now carrying two white plastic “bodega” bags with an apparent softball-sized weighted object within each. URENA then entered **Target Location 6**.

115. A short time later, investigators established surveillance in Hartford, CT in the vicinities of **Target Location 2**, **Target Location 4** and **Target Location 5**, awaiting the expected closing time of **Target Location 2**. Soon thereafter, investigators observed UM-2 exit the front door of **Target Location 2**, and approach **Target Vehicle 5**, placing a small black object, believed to be a “bodega” bag, inside. UM-2 returned immediately back inside **Target Location 2**, where he remained briefly, before again exiting. At this point, UM-2 began to lock the door and roll down gates to **Target Location 2**. Moments later, UM-2 entered **Target Vehicle 5** and prepared to depart. Simultaneously, investigators observed “JUAN,” emerge from the alleyway behind **Target Location 2**, walking along New Britain Ave. towards Bobby’s Liquor Store. “JUAN” was later seen walking back towards Webster St.

116. At this point, UM-2 departed the area **Target Vehicle 5**. Investigators maintained constant surveillance on UM-2, as he traveled from **Target Location 2** to **Target Location 4**. TFO Tessier observed UM-2 park **Target Vehicle 5** along Rose Avenue. TFO Verillo then observed UM-2 exit **Target Vehicle 5** carrying a small black bodega bag, which he brought directly inside of the apartment building which **Target Location 4** is within. Moments later, TFO Tessier, TFO Torres, and TFO Verillo observed a light illuminate within **Target Location 4**, via an exterior window which investigators are aware is part of the specific apartment unit that comprises **Target Location 4**.

117. Simultaneously, TFO Cagianello and TFO Nelson had maintained surveillance in the

vicinity of **Target Location 5**. After a short time, “JUAN” was observed walking along Maple Avenue towards Mountford Street. TFO Cagianello and TFO Nelson observed “JUAN” turn onto Mountford Street, carrying a black plastic bodega bag and a water bottle, which he carried as he walked down the driveway of **Target Location 5**. TFO Cagianello last observed “JUAN” as he was directly in front of the rear door to **Target Location 5** preparing to enter.

GENERAL INFORMATION REGARDING DRUG TRAFFICKING

118. During my tenure as a law enforcement officer, I have investigated and participated in operations which involved, in part, drug trafficking violations, and the flow of the illegal proceeds obtained from drug trafficking and related offenses. Search warrants relating to these investigations have covered, among other locations, residences, vehicles, businesses, stash locations and distribution locations used by drug traffickers and their co-conspirators.

119. Materials searched for and recovered in these locations have included, among other evidence, the following: controlled substances; drug paraphernalia, such as scales, processing materials and packaging materials; books and records reflecting drug sales, the transfer or transportation of drugs and amounts of monies owed for drugs; records reflecting the names, addresses and telephone numbers of co-conspirators; sales receipts and other records reflecting the expenditure of monies that are proceeds from unlawful drug distribution; currency and money wrappers; records of bank transactions made to conceal and launder drug trafficking proceeds; cellular telephones; computers, computer disks and answering machines; and various valuable assets such as real property and automobiles that were purchased with the proceeds of unlawful drug trafficking. These items obtained during the executions of said search warrants, have constituted evidence of drug violations, the acquisitions of assets with drug trafficking proceeds, and the use of the assets to facilitate drug trafficking violations.

120. Based on my training, experience and participation in this and other drug trafficking investigations, I know that:

- a. Drug traffickers often place assets in names other than their own to avoid detection of these assets by law enforcement;
- b. Drug traffickers often place assets in the names of businesses and corporate entities as nominee title holders in order to avoid detection of these assets by law enforcement;
- c. Drug traffickers often use multiple cellular telephones to facilitate drug deals. Indeed, cooperating sources in this investigation were provided no fewer than two cellular telephones to arrange drug transactions;
- d. Drug traffickers must maintain and have quick access to large amounts of United States currency, foreign currency, or other liquid assets in order to maintain and finance their ongoing drug business; these materials, as well as records, generally described below, are often kept and maintained within premises controlled or used by the drug traffickers within safes or lock boxes;
- e. Drug traffickers maintain in their residences computerized or written books, records, receipts, diaries, ledgers, calendars, personal telephone/address books, airline tickets, airline schedules and airline receipts, cashier's checks, money orders, telephones with memory capabilities, telephone answering machines and telephone answering tapes, and other papers relating to the transportation, ordering, sale and distribution, of controlled substances and the outstanding debts and collections from controlled substances that have been distributed; these materials are often maintained within the electronic memory of personal computers, I-Pads or other computerized tablets, external hard drives, memory cards and "thumb drives" kept and maintained at premises under the control of the drug

traffickers;

f. Drug traffickers commonly provide narcotics on consignment sale to their customers, who subsequently pay for the drugs after reselling the drugs. Therefore the above mentioned books, computerized records, receipts, notes, ledgers, et cetera, will be secured by the drug traffickers within their residences for their ready access to them for the purpose of determining drug debts and collecting monies derived from the sale of drugs;

g. Drug traffickers commonly conceal contraband, proceeds of drug transactions, records of these transactions, and records reflecting names, nicknames, addresses and telephone numbers of drug associates within their residences, for ready access and to conceal them from law enforcement agencies;

h. Drug traffickers commonly maintain records reflecting names, nicknames, addresses, and telephone numbers of both their current and past drug associates;

i. Drug traffickers who are aware of an ongoing criminal investigation will often destroy an existing format of records reflecting their drug transactions. However, it is common for drug traffickers, particularly traffickers who provide or receive drugs on a consignment basis, to create another type of drug record to assist the trafficker in the collection of drug debts;

j. Drug traffickers commonly use their homes to store records and/or receipts reflecting the collection of drug debts and the distribution of controlled substances, as well as records and receipts reflecting the expenditure of drug proceeds for personal and business assets;

k. Drug traffickers will commonly conceal within their residences or within the curtilage

of their residences, quantities of narcotics, large amounts of currency, firearms, financial instruments, jewelry, electronic equipment, motor vehicles and other items of value and proceeds of drug transactions and evidence of financial transactions relating to obtaining, transferring, secreting, and spending large sums of money derived from drug trafficking;

l. Drug traffickers will attempt to legitimize the profits from illegal drug transactions by using domestic banks and their attendant services such as safe deposit boxes, securities, cashier's checks, money drafts, letters of credit, brokerage houses, real estate and business fronts;

m. Persons involved in drug trafficking who are aware of a criminal investigation into their financial drug activities, will conceal, liquidate, and transfer easily movable drug derived assets in order to prevent law enforcement agencies from seizing and forfeiting their assets;

n. Drug traffickers often have photographs, digital electronic data, or video movies of themselves, their co-conspirators and the property and assets purchased with drug proceeds. These photographs and video movies are normally in the drug traffickers' possession or residence;

o. The State of Connecticut is generally viewed as a consumer state in regards to narcotic activity. However, it is common for drug traffickers to travel to major distribution centers such as New York to purchase their narcotics for distribution. It is known that after purchasing these narcotics, drug traffickers will transport these narcotics or cause them to be transported to those areas in which they will be distributed to their customers. It is known that drug traffickers' methods include, but are not limited to: commercial airlines, private motor vehicles, tractor trailer units, public transportation,

and motor vehicles with concealed compartments, and government and contract mail carriers. It is known that the residences of drug traffickers will often contain records of drug related travel. These records may include airline ticket receipts, credit card receipts, rental car receipts and luggage tags reflecting points of travel.

p. Based on my training and experience, drug traffickers commonly have firearms and other weapons in their possession, in their cars, on their person, at their residence, including, but not limited to handguns, rifles, shotguns, automatic weapons, and knives. These firearms and weapons are most often kept to protect and secure drug traffickers' property;

q. Based on my training, experience and participation in this and other drug trafficking investigations, I know that it is generally a common practice for drug traffickers to store their drug inventory and drug related paraphernalia in their residences, cars or those of trusted associates. This paraphernalia frequently includes scales, funnels, sifters, grinders, plastic bags, heat sealing devices, and dilutants;

r. Based on my training and experience, drug dealers often create secret locations, commonly called "traps," in their automobiles. Often, drug dealers will use these automobiles to store narcotics, weapons, money and other items and documents related to their drug trade. As described throughout this affidavit, there is significant evidence that this DTO is utilizing traps in multiple vehicles; and

s. Based on my training, experience and participation in this and other drug trafficking investigations, I know that drug traffickers often possess, maintain and control other items related to their drug trafficking activities, as described in **Attachment H** to this affidavit, in their cars, homes, garages and out-buildings, and in safes or lock boxes

maintained at such locations.

121. In addition, there is probable cause to believe that within the **Target Locations** there will be substantial evidence of the target crimes, including documents, records, items or other evidence regarding, among other things, the following: financial transactions relating to obtaining, transferring, secreting or spending of sums of money made from engaging in narcotics trafficking activities; contraband; quantities of narcotics and controlled substances; scales; cutting agents, dilutants; and drug packaging materials; addresses or telephone numbers in books, papers, cellular telephones or electronic organizers, and their electronically stored contents, which reflect names, addresses, telephone numbers of and text messages to or from their associates and/or clients in narcotics trafficking activity; photographs and digital recordings of participants and associates in narcotics trafficking activity and of property acquired as a consequence of narcotics trafficking activities; safes and other secure storage containers and their contents; identification documents and keys evidencing a possessory interest in premises, vehicles and storage containers; their possession, ownership and/or use of cellular telephones; their possession, ownership and use of motor vehicles; travel to locations to meet sources of supply and/or other narcotics trafficking associates; U.S. Currency used to purchase and/or pay for wholesale quantities of illegally obtained Oxycodone pills and other controlled substances; U.S. Currency derived from the sale of narcotics; unexplained wealth arising from their narcotics trafficking activities; receipts, transactions records and other documents relating to the transfer of money to their sources of supply and/or other co-conspirators; and records relating to the rent and use of storage locker units, safety deposit boxes or other property used to facilitate their illegal activities.

CONCLUSION

122. On the basis of the foregoing information, there is probable cause to believe, and I do believe, that Wilmer SERRANO, Rey URENA, Yan REYES, Ramon VARGAS, Johnattan FERNANDEZ-LOPEZ, and Jose LORA, have committed violations of 21 U.S.C. § 841 (possession with intent to distribute, and distribution of, controlled substances) and 21 U.S.C. § 846 (conspiracy). In addition, there is probable cause to believe that the items described in **Attachment H** to the search warrant, which are fruits, instrumentalities and evidence of these crimes, will be found at the **Target Locations**, which are more fully described in **Attachment A** through **F**.

Chad Nelson
Task Force Officer
Drug Enforcement Administration

The truth of the foregoing affidavit has been attested to me by Task Force Officer Chad Nelson over the telephone on this ____ day of May, 2020.

HON. ROBERT M. SPECTOR
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Premises to Be Searched (Target Location 1)

The **Target Location 1** is a “bodega” called JZ Tobacco located at 25 New Britain Avenue, Hartford, CT. 25-27 New Britain Avenue is a three story building with two stores on the first floor, and apartments on floors two and three. The **Target Location 1** is the business on the left of a “Boost Mobile” store. The **Target Location 1** has a rear entrance which is believed to open into a back staircase of the building.



The scope of the search is to encompass the entire **Target Location 1**, including but not limited to: the basement, backrooms, bathrooms, desks, drawers, file cabinets, safes, boxes, briefcases, garages, sheds, receptacles or any other storage containers or facilities whether inside or outside. The search for the items detailed in **Attachment H** also includes cellular and mobile telephones and closed circuit television hard drives found the **Target Location 1**. Executing agents may remove seized digital media from the premises for off-site examination.

ATTACHMENT B

Premises to Be Searched (Target Location 2)

The **Target Location 2** is a “bodega” called Prestige Market located at 23 New Britain Avenue, Hartford, CT. 23 New Britain Avenue is a one story store front. The **Target Location 2** has three roll-up storefront gates that are locked when the store is closed. The **Target Location 2** has a rear entrance which is believed to open into a back room of the business.



The scope of the search is to encompass the entire **Target Location 2**, including but not limited to: the basement, backrooms, bathrooms, desks, drawers, file cabinets, safes, boxes, briefcases, garages, sheds, receptacles or any other storage containers or facilities whether inside or outside. The search for the items detailed in **Attachment H** also includes cellular and mobile telephones and closed circuit television hard drives found the **Target Location 2**. Executing agents may remove seized digital media from the premises for off-site examination.

ATTACHMENT C

Premises to Be Searched (Target Location 3)

The **Target Location 3** is located at 63 Colonial Street Apt# A, Hartford, CT. 63 Colonial Street is a light brown colored brick three-story apartment complex, believed to consist of twelve apartments. The **Target Location 3** has a front door which leads to a common hallway to the apartment building. The **Target Location 3** has a green rear door that leads directly into apartment #63A.



The scope of the search is to encompass the entire **Target Location 3**, including but not limited to all rooms within the apartment, desks, drawers, file cabinets, safes, boxes, briefcases, or any other containers located within the apartment, as well as any locations at 63-65 Colonial Street to which the residents of apt. 63A have unencumbered or shared access (e.g. the basement and detached garage). The search for the items detailed in **Attachment H** also includes all cellular and mobile telephones. Executing agents may remove seized digital media from the premises for off-site examination.

ATTACHMENT D

Premises to Be Searched (Target Location 4)

The **Target Location 4** is located at 48 South Street, Apt. #B2, West Hartford, CT. 48 South Street is a tan colored brick structured three-story apartment complex with a front and rear main entrance which requires a key fob. The **Target Location 4** is apartment B2 located on the second floor of the apartment building. The front and rear doors open to a common area stairwell, apartment B2 is located up the first stairwell and through an unlocked door into a common hallway. Apartment B2 is located on the south side of the building (closest to Rose Avenue) and is marked with "B2" on the white colored door.



The **Target Location 4** only includes apartment B2 of 48 South Street, West Hartford, CT.

The scope of the search is to encompass the entire **Target Location 4**, including but not limited to all rooms within the apartment, desks, drawers, file cabinets, safes, boxes, briefcases, or any other containers located within the apartment as well as any locations at 48 South Street to which the residents of apt. B2 have unencumbered or shared access (e.g. the basement). The search for the items detailed in **Attachment H** also includes all cellular and mobile telephones. Executing agents may remove seized digital media from the premises for off-site examination.

ATTACHMENT E

Premises to Be Searched (Target Location 5)

The **Target Location 5** is located at 19-21 Mountford Street Floor 3, Hartford, CT. 19-21 Mountford Street is a yellow and brown colored three-story building. The **Target Location 5** has an enclosed front porch which leads to two front doors. **Target Location 5** has a driveway on both sides of the building and includes rear parking. **Target Location 5** has a rear entrance that leads to a common stairwell for all three floors of the apartment building.



The scope of the search is to encompass the entire **Target Location 5**, including but not limited to all rooms within the apartment, desks, drawers, file cabinets, safes, boxes, briefcases, or any other containers located within the apartment as well as any locations at 19-21 Mountford Street to which the residents of the 3rd floor have unencumbered or shared access (e.g. the basement and/or attic). The search for the items detailed in **Attachment H** also includes all cellular and mobile telephones found in the **Target Location 5**. Executing agents may remove seized digital media from the premises for off-site examination.

ATTACHMENT F

Premises to Be Searched (Target Location 6)

The **Target Location 6** is located at 278 Columbia Boulevard, Waterbury, CT. 278 Columbia Boulevard is a white two-story house with an attached one car garage. The **Target Location 6** includes the entire house of 278 Columbia Boulevard in Waterbury, Connecticut. When looking at the front of the residence, there is an attached one car garage to the left of the residence, there is a red front door with the numbers "278" above the door.



The scope of the search is to encompass the entire **Target Location 6**, including but not limited to: the basement, backrooms, bathrooms, desks, drawers, file cabinets, safes, boxes, briefcases, garages, sheds, receptacles or any other storage containers or facilities whether inside or outside. The search for the items detailed in **Attachment H** also includes all cellular and mobile telephones. Executing agents may remove seized digital media from the premises for off-site examination.

ATTACHMENT G

YAN REYES A.K.A. "JUAN"



Approximately 5'10, 210 lbs, approximately 40-45 years old. A rosary tattoo on middle finger, of left hand. Last known residence of 19-21 Mountford Street, Floor 3, Hartford, Connecticut.

ATTACHMENT H

Particular Things to be Seized

The following property, records, and information that constitute evidence, fruits, and/or instrumentalities of violations of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 846 (conspiracy to possess with intent to distribute oxycodone and fentanyl) (the "TARGET OFFENSES"), including, but not limited to:

1. Narcotics, oxycodone, and other controlled substances;
2. Firearms;
3. United States Currency;
4. Drug paraphernalia, including but not limited to, syringes, vials, distribution bags, scales, baggies, envelopes, needles.
5. Lists of customers and related identifying information;
6. Types, amounts, and prices of drugs trafficked as well as dates, places, and amounts of specific transactions;
7. Any information related to sources of drugs or drug customers (including names, addresses, phone numbers, or any other identifying information);
8. All bank records, checks, credit card bills, account information, and other financial records.
9. Money orders, receipts for money orders, and other documents evincing payment;
10. Boxes and other shipping documents related to the transport and delivery of controlled substances, including but not limited to packaging materials, shipping boxes, and delivery records;
11. Records, including phone logs, notes, ledger, lists, logs, notebooks, tallies, receipts, correspondence, text messages, electronic mail, chat logs, and other communications or documents, related to the sale of controlled substances;
12. Video recordings made by any and all surveillance cameras;
13. Communications and evidence of communications by and between and among URENA, RUIZ-SERRANO, JUAN LNU, CABRERA-DEALVAREZ, VARGAS, LORA, FERNANDEZ-LOPEZ, and RODRIGUEZ-GUERRERO as well as the individuals to whom they sell controlled substances;
14. Records and information related to the identity of any potential co-conspirators;
15. Documents and items concerning the location and access of any storage facility, including any keys, code, passcards, access device, or passwords.

ATTACHMENT I

A silver 2006 Jeep Commander, VIN 1J8HG48K76C214561, registered to "Wilmer A. RUIZ SERRANO" 890 E Sanger Street, Philadelphia, PA, which as of May 10, 2021 displayed no vehicle registration. The raised lettering located on the body panel of the rear lift gate above the license plate that describes the vehicle's manufacturer, i.e. Jeep, is missing the letter "J".



ATTACHMENT J

A gray 2017 BMW X3, bearing New York registration JCT6037, VIN 5UXWX9C30H0W73879, registered to "Ramon D. URENA" 476 W 165th Street # 1J, New York, NY.



ATTACHMENT K

A black 2018 BMW M3, bearing New York registration KLD4439, VIN WBS8M9C53J5J79652, registered to "Francesca R. SERRANO" 3820 Bailey Avenue 1A, Bronx, NY.



ATTACHMENT L

A maroon 2016 Jeep Cherokee, VIN 1C4RJEAG7GC479832, which as of May 10, 2021 displayed a Florida Dealer registration of PK285J, registered to Prestige Broadway Auto Sales LLC, 2926 N. Orange Blossom Trail, Orlando, FL.



ATTACHMENT M

A blue 2007 Ford F-150, bearing Florida paper registration U079474, 2 door, 4 wheel drive, 6 foot bed, regular cab, with tow hitch receiver.



ATTACHMENT N

A yellow Volkswagen Beetle, approximate model year of 2005, which as of May 11, 2021 displayed a Florida Dealer registration of PK723D, registered to Prestige Broadway Auto Sales LLC, 2926 N. Orange Blossom Trail, Orlando, FL. Vehicle is missing the front Volkswagen emblem.

