

Approved: Marguerite B. Colson  
MARGUERITE B. COLSON  
Assistant United States Attorney

Before: HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA : COMPLAINT  
:   
- v. - : Violations of 21 U.S.C.  
: § 841  
BENITO BELLO, :   
a/k/a "Zuriel Ayala Rodriguez," : COUNTY OF OFFENSE:  
: BRONX  
Defendant. :   
:   
-----x  
SOUTHERN DISTRICT OF NEW YORK, ss.:

VICTOR VEROUHIS, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

**COUNT ONE**  
**(Possession with Intent to Distribute Controlled Substances)**

1. On or about August 10, 2022, in the Southern District of New York and elsewhere, BENITO BELLO, a/k/a "Zuriel Ayala Rodriguez," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).)

**COUNT TWO**  
**(Possession with Intent to Distribute Controlled Substances)**

3. On or about August 10, 2022, in the Southern District of New York and elsewhere, BENITO BELLO, a/k/a "Zuriel

Ayala Rodriguez," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a) (1).

4. The controlled substance involved in the offense was 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (B).

(Title 21, United States Code, Sections 812, 841(a) (1), and 841(b) (1) (B).)

The bases for my knowledge of the foregoing charge are, in part, as follows:

5. I am a Special agent with HSI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Based on my participation in this investigation, including my review of law enforcement records and other documents, law enforcement surveillance, my conversations with the confidential source described below, and my conversations with other law enforcement officers, I have learned the following:

a. On or about January 31, 2013, the Trial Court of Massachusetts, Superior Court, issued a warrant for the arrest of BENITO BELLO, a/k/a "Zuriel Ayala Rodriguez," the defendant, for failure to appear on charges of drug trafficking, assault and battery, possession of a dangerous weapon, and negligent operation of a motor vehicle (the "Warrant").

b. On or about August 10, 2022, law enforcement agents with the United States Marshal Service ("Marshals"), the Drug Enforcement Administration, and HSI (collectively, the "Agents") sought to arrest BELLO on the Warrant, after law enforcement surveillance located BELLO at a particular residence in the Bronx (the "Bronx Residence").

c. The Bronx Residence is located next to a day care center for children as young as six weeks old.

d. When the Agents arrived at the Bronx Residence, a female residing there (the "Female") asserted that there was a male inside (the "Male"). Also inside the Bronx residence were two minor children.

e. The Agents summoned the Male outside the Bronx Residence, whereupon the Male descended the stairs, visibly wet.

f. As Marshals proceeded to sweep the Bronx Residence for officer safety, they observed a white powdery substance in a bathroom toilet, which was running as if it had been flushed. A photograph of what the Marshals observed is below.



g. While outside the Bronx Residence, the Male identified himself to the Agents as "Zuriel Ayala Rodriguez," stating that he was from Puerto Rico.

h. Once escorted back into the Bronx Residence, the Male acknowledged that he was BELLO and that he was aware that the Warrant had been issued in Massachusetts for his arrest.

i. In a particular bedroom of the Bronx Residence, the Agents located personal items, including sneakers, believed to belong to BELLO, as well as a dresser (the "Dresser").<sup>1</sup>

j. The Dresser contained a hidden compartment equipped with a hydraulic lock and holding approximately 14 kilograms of suspected fentanyl, as well as approximately one kilogram of suspected cocaine.<sup>2</sup>

k. Inside the Dresser drawers were masks, a scale, and other drug paraphernalia. Based on my training and experience, I know that individuals often wear masks when handling fentanyl, given the extreme potency of the controlled substance.



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<sup>1</sup> The Female stated, in sum and substance, that BELLO alone used the Bedroom and that she would enter only to drop off laundry.

<sup>2</sup> The Agents field tested a selection of the suspected narcotics located in the Dresser.

l. On the floor next to the Dresser was a pill press, as well as a cooler containing a kilogram press.

m. Located in a bag on top of the Dresser was approximately \$28,000 in cash.

WHEREFORE, I respectfully request that a warrant issue for the arrest of BENITO BELLO, a/k/a "Zuriel Ayala Rodriguez," the defendant, and that he imprisoned or bailed, as the case may be.

S/ by the Court with permission

VICTOR VEROUHIS  
Special Agent  
Homeland Security Investigations

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1,

This 11th day of August, 2022



THE HONORABLE ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK