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★ MAR 15 2018 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

M. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(A)(i); T. 18, U.S.C.,  
§ 2)

JUAN JIMENEZ, also known as  
"JASON,"

Defendant.

MJ 18-0225  
MJ 18-0225

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EASTERN DISTRICT OF NEW YORK, SS:

Jeffrey Bolettieri, a Task Force Officer with the Drug Enforcement

Administration ("DEA"), being duly sworn, depose and states:

Upon information and belief, on or about March 14, 2018, within the Eastern District of New York and elsewhere, the defendant JUAN JIMENEZ, also known as "JASON," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved one kilogram or more of heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i); T. 18, U.S.C., Section 2) ).

The source of my information and grounds for my beliefs are as follows:

1. I have been a Task Force Officer with the DEA for approximately (13) years and am currently assigned to Enforcement Group D-12, Long Island District

Office, New York where I am tasked with investigating narcotics trafficking and money laundering, as well as other offenses. During my tenure with the DEA, I have participated in numerous narcotics investigations, I have conducted physical surveillance, monitored undercover operations, debriefed cooperating witnesses and confidential informants, monitored wiretaps, and interviewed civilian witnesses.

2. Because this affidavit is being submitted for the purpose of establishing probable cause to arrest, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only.

3. The DEA has been investigating heroin trafficking organizations with ties outside the United States that are distributing heroin in the Eastern District of New York, including in Nassau and Suffolk Counties. As part of that investigation, a Cooperating Source ("CS") has been working with law enforcement officers.<sup>1</sup> In May 2017, CS indicated that he knew a drug dealer who had lost his smuggling connection to New York. This dealer was seeking someone new to smuggle heroin into the United States to deliver to one of his clients on Long Island. Acting at the direction of law enforcement officers, the CS told the dealer that CS was a smuggler, was already smuggling heroin to Long Island. The drug dealer offered to introduce CS to his customer on Long Island, with the understanding that the CS

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<sup>1</sup> CS has proven to be reliable as information provided by him/her has been corroborated by other sources, including other cooperating sources, recorded conversations, text messages and surveillance by law enforcement officers.

would pay the dealer \$1,000 for every kilo of heroin CS sold to the dealer's customer that CS provided from any other source of heroin other than the drug dealer. Once that agreement was reached the dealer, with the CS present, called his client on Long Island and introduced CS over the phone to his customer over the phone, whom the dealer referred to as "JASON," now known to be the defendant JUAN JIMENEZ. During that phone conversation, CS arranged to meet with the defendant "JASON" on Long Island.

4. In May 2017, CS met with the defendant JUAN JIMENEZ, also known as "JASON," on two occasions. The first meeting was in Babylon, New York; the second, a few days later, was held in Queens, New York. During those meetings which were recorded with audio and video, the defendant JASON negotiated with CS for the purchase of multiple-kilograms of Colombian white powder heroin that CS would smuggle into the Eastern District of New York. Thereafter, the defendant and the CS remained in contact. By February 2018, the defendant met with the CS twice in Brentwood, New York. The defendant JIMENEZ also known as "JASON," was now negotiating for the delivery of between six to ten kilograms of heroin every two weeks from CS, which the defendant described as "a good start." The heroin was to cost a total of \$55,000 per kilogram. Before the heroin would be delivered, the defendant would have to make payment to CS, his fee for smuggling and transporting the heroin of \$6000 a kilogram. The heroin would then be delivered to the defendant. The defendant JIMENEZ would then sell the heroin. Once the defendant sold the heroin, he would pay CS the remainder of the \$55,000 for each kilogram of heroin. These meetings and conversations were recorded.

5. Later in February 2018, CS told the defendant that he had a load of six kilograms of heroin from Colombia, ready for delivery on Long Island. Over a few weeks, the defendant JIMENEZ indicated he was having problems with his “money man” coming up with the money, \$36,000, needed to pay CS his smuggling fee. CS then told the defendant, that he could not wait, and was releasing the load to another buyer, but the defendant might get his next load of heroin.

6. In March 2018, CS contacted the defendant and told him the next load of six kilograms of heroin was available. In numerous conversations which followed, over WhatsApp, an encrypted internet application, the defendant indicated his “money guy” was back and he was ready. After those conversations the defendant and the CS met in Queens, New York. The defendant told the CS he had been to Ohio and obtained Mexican brown heroin, between 2.5 and 3 kilograms that he needed to sell first to pay CS his \$36,000 fee. The defendant indicated he was having a hard time because nobody wanted to buy Mexican heroin.<sup>2</sup> The defendant JIMENEZ asked the CS whether the CS had a buyer for the Mexican heroin. CS indicated he had a Canadian buyer. The defendant provided a sample of the heroin to the CS. The two agreed to meet the following day, March 14, 2018, in Brentwood, New York where the defendant would transfer the heroin to CS.


7. On or about March 14, 2018, the defendant JIMENEZ arrived for the pre-arranged meeting in a parking lot, in Brentwood, New York. The defendant was driving a

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<sup>2</sup> I am aware from my many narcotics investigations that Mexican heroin is considered less desirable than Colombian white powder heroin as the Mexican “black tar” heroin is hard and not a powder and is of lesser potency and effect and has many more impurities that can cause an increased risk of death to the user.


Jeep which had a secret concealed storage area, known as a "trap," built into the rear cargo area of the Jeep. The defendant got out of his vehicle, opened the trap and removed a red plastic bag. The red bag was then placed in the CS vehicle. The red bag contained approximately 2.35 kilograms of "black tar" heroin which, as with the sample the defendant JIMENEZ had previously provided, field-tested positive for the presence of heroin. Agents who had surveilled and recorded the meeting placed the defendant JUAN JIMENEZ, also known as "JASON," under arrest.

WHEREFORE, I respectfully request that the defendant JUAN JIMENEZ, also known as "JASON," be dealt with according to law.



Jeffrey Bolettieri,  
Task Force Officer  
DEA

Sworn to before me this  
15<sup>th</sup> day of March, 2018



HONORABLE GARY R. BROWN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK