

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

Jonathan Bohn)
a/k/a Jonah)

Case No.)

6:19-mj- 1327)

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of December 15-16, 2017 in the county of Orange in the Middle District of Florida, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1) and (b)(1) (C).

Distribution of a controlled substance resulting in death

This criminal complaint is based on these facts:

Continued on the attached sheet.

R. Scott Coolidge, Jr.

Complainant's signature

Raymond S. Coolidge, Jr., Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/16/19

Leslie Hoffman

Judge's signature

Leslie Hoffman, U.S. Magistrate Judge

Printed name and title

City and state: Orlando, FL

STATE OF FLORIDA
COUNTY OF ORANGE

CASE NO. 6:19-mj- 1327

AFFIDAVIT IN SUPPORT
OF THE ISSUANCE OF AN ARREST WARRANT

I, Raymond S. Coolidge, being duly sworn, depose and state the following:

1. I am a Special Agent (“SA”) with the United States Drug Enforcement Administration (“DEA”) assigned to the Orlando District Office. I have been a Special Agent since January 2011, and have completed DEA basic training at the DEA Academy in Quantico, Virginia, along with numerous other law enforcement training courses.

2. I have participated in, and conducted, investigations of violations of various state and federal criminal laws, including unlawful possession with intent to distribute controlled substances, distribution of controlled substances, use of communication facilities to commit narcotics offenses, conspiracy to import, possess with the intent to distribute and distribute controlled substances, and money laundering, all in violation of federal law. Those investigations have resulted in the arrests of individuals who have smuggled, received, and distributed controlled substances, including cocaine, marijuana, heroin, and methamphetamine.

3. I have also conducted investigations concerning the identification of co-conspirators through the use of telephone records and bills, financial records, drug ledgers, and other pertinent documents. I have executed search warrants for controlled substances and have conducted surveillance in connection with numerous narcotics investigations.

4. I have debriefed and directed numerous confidential sources (“CSs”), cooperating witnesses (“CWs”), and sources of information (“SOIs”) regarding narcotics investigations and the investigation of various crimes that arise from drug trafficking activities. I have directed numerous CSs and CWs to successfully infiltrate narcotics enterprises by way of intelligence gathering, participation in consensual recordings, and monitored purchases of controlled substances.

5. I am familiar with the ways in which narcotics traffickers conduct their business, including methods of importing and distributing narcotics, money laundering, the use of telephones to facilitate their illegal acts, and the use of codes to conduct drug transactions. My training and experience as a DEA SA, and my conversations with other law enforcement officers, form the basis of the opinions and conclusions set forth in this affidavit and are based on the facts below.

Arrest Warrant Requested

6. This affidavit is made in support of an application for an arrest warrant for Jonathan BOHN, also known as (a/k/a) "Jonah," for a violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C) (distribution of a controlled substance resulting in death). This affidavit does not contain everything I know regarding this investigation, but only a summary of facts necessary to establish probable cause.

Background of Investigation

7. On December 16, 2017, at 9:00 a.m., the Orange County Sheriff's Office ("OCSO") received a phone call in reference to a possible overdose involving an individual with the initials L.F. (hereafter referred to as the the "VICTIM"), who was found unresponsive by her daughter, an individual with the initials K.F., at their home located in Orlando, Florida (the "Residence"). At approximately 9:08 a.m., after arriving on the scene, an Orange County Paramedic pronounced the VICTIM deceased.

8. OCSO Deputies and paramedics found the VICTIM in the master bedroom bathroom, sitting on the toilet, with her arms and head on the sink's countertop. K.F. told OCSO Deputies that she last saw the VICTIM at approximately 12:00 a.m. when the VICTIM walked inside the Residence and went directly to her bedroom. K.F. then stated that she went to take a shower

in the VICTIM's bathroom, which has a second entrance connected to the hallway, but the door was locked. K.F. also found the VICTIM's bedroom door was locked and her mother did not answer when she knocked on the door. As a result, K.F. felt that something was wrong and picked the door lock and discovered her mother on the toilet seat, leaning on the sink's counter. She tried to wake her mother with no success, so she called 911 to get assistance. K.F. informed OCSO deputies that the VICTIM had battled with an addiction to cocaine and Xanax, but had been doing well until she "*fell off the wagon.*"

9. During a search of the Residence, an OCSO Crime Scene Investigator located a small handbag in the nightstand next to the VICTIM's bed. Among other items, inside the handbag were three small baggies. Specifically, one of the baggies was clear with a powder residue inside ("Clear Bag"), another was blue and had a powder residue inside ("Blue Bag"), and the third baggie was green with a light brown powder inside it ("Green Bag").

10. Final lab results from the DEA's Southeast Laboratory indicate that that the Clear Bag and the Blue Bag contained cocaine, phenacetin and lidocaine residue. Final lab results from the DEA's Southeast Laboratory indicate that the Green Bag contained heroin, fentanyl, cocaine and lidocaine residue. As explained more fully below, law enforcement believes that the

drugs contained in the Green Bag resulted in the VICTIM's death.

11. An Orange County Medical Examiner's Office Investigator arrived on scene and found no signs of trauma or foul play. The VICTIM's body was taken to the Orange County Medical Examiner's Office, located in Orlando, Florida for an autopsy. After K.F. identified the VICTIM's phone, OCSO deputies seized it. Subscriber information from the telephone number associated with the handset indicated that the telephone number was subscribed to the VICTIM with the Residence listed as her address.

12. On December 18, 2017, the Honorable Judge Shoemaker, Associate Administrative Judge for the Ninth Judicial Circuit Court of Florida, authorized the search of the VICTIM's cellular telephone. On March 27, 2018, the Honorable Julie H. O'Kane, Administrative Circuit Judge for the Ninth Judicial Circuit Court of Florida, authorized the search of historical cell site data associated with the VICTIM's phone.

13. In the VICTIM's telephone, law enforcement found text messages from several telephone numbers, including telephone number 407-706-7054, which is saved in the VICTIM's phone as "*Jonah/ Rey*," and was determined to be linked to BOHN (more information provided below).

Information Linking Telephone number 407-706-7054 to BOHN

14. Law enforcement believes telephone number 407-706-7054 was used by BOHN because that number, 407-706-7054, was listed in a November 1, 2017, Orange County Sheriff's Office report as belonging to "Jonathan Bohn" (*i.e.*, BOHN), who lived at a residence located at Old Dock Road in Orlando, Florida ("Old Dock Road Residence"). This report referred to the theft of property; BOHN was a witness to the crime. Corporal Fairley contacted OCSO Deputy Jeremy Harris who took the November 1, 2017, report and witnessed BOHN list his telephone number as 407-706-7054. Corporal Fairley showed Deputy Harris the driver's license photograph of BOHN from the Florida driver's license database and Deputy Harris confirmed that the individual in the photograph, BOHN, listed telephone number 407-706-7054 and signed the report on November 1, 2017.

15. Additionally, the Old Dock Road Residence was listed in another Orange County Sheriff's Office report dated December 5, 2017. In that report, family members accused BOHN of stealing personal property. The report notes that BOHN had lived at the residence located at Old Dock Road Residence, but had moved out of the residence in June/July 2017.

16. Law enforcement also learned that telephone number 407-706-7054 is associated with an account on the application "Dington," which

allows a user to text and make phone calls with individual phone numbers. Subscriber information associated with the account indicates that it is registered in the name of "Jonah Bohn" at an email address of jonahbarber.jb@gmail.com. Three photographs are connected to this account, two of which are photographs of BOHN.

17. On January 11, 2018, the Honorable David P. Johnson, Orange County Judge for the Ninth Judicial Circuit Court of Florida, authorized the search of information associated with the "Dingtone" account. During the time period when the VICTIM and BOHN were texting on December 15, 2017, between 10:21 p.m. and 11:41 p.m., the account associated with telephone number of 407-706-7054 utilized an IP address subscribed to an individual known by the initials C.P. who lives at a residence on Circle Lake Court in Orlando, Florida ("Circle Lake Residence"). The Circle Lake Residence is in the Lake Pickett Manor subdivision where law enforcement believes BOHN met with the VICTIM on December 15, 2018, to sell her, the VICTIM, \$20 of heroin (more information provided below).

18. Law enforcement also learned that an arrest occurred at the Circle Lake Residence on January 18, 2018. The arresting officer, OCSO Deputy James Baggs confirmed that BOHN was not involved in the incident, but Deputy Baggs did see BOHN at the Circle Lake Residence during Deputy

Baggs's investigation. Specifically, Deputy Baggs said during his investigation he saw BOHN enter the house as if he lived there. Deputy Baggs was shown a picture of BOHN from DAVID and identified BOHN as the individual who walked into the Circle Lake Residence.

19. In addition, three "Crimeline" tips have referenced the Circle Lake Residence in connection to complaints about narcotics activity. Specifically, on February 1, 2018, law enforcement learned that in response to a "Crimeline" tip, OCSO deputies went to the Circle Lake Residence. After law enforcement knocked on the door, a woman with the initials C.P. (*i.e.*, the same initials as referenced in paragraph 17) opened the door and talked with OCSO deputies. When the deputies asked C.P. about the "Crimeline" tip, C.P. told the deputies she lived there with her husband and that they were helping a family friend, "Jonah Bohn," stay there to get his life together. C.P. stated that this "Jonah Bohn," who I believe is BOHN, had a history of narcotics use and was trying to get clean.

Relevant Text Messages from the VICTIM to BOHN and Cell Site Data on December 15-16, 2018

20. Below is a chronological list of texts and calls on December 15-16, 2017, between the VICTIM and telephone numbers:

- 407-706-7054, which is saved in the VICTIM's phone as "Jonah/

Rey,” and is referred to as BOHN below,

- 407-793-5007, which is saved in the VICTIM’s phone as “*Rey,*”
- 407-970-4398, which is saved in the VICTIM’s phone as
“*Raymond*”

10:21 p.m. - Text from the VICTIM to BOHN: “*What happened last night?*”

10:23 p.m. - Text from BOHN to the VICTIM: “*the touchscreen on my phone wasn’t working i literally just got another metro phone like 30 min ago*”

10:24 p.m. - Text from the VICTIM to BOHN: “*I need a 20*”

10:25 p.m. - Text from BOHN to the VICTIM: “*ok were you at*”

10:26 p.m. - Text from the VICTIM to BOHN: “*At work should be leaving in 30 to 40 minutes.*”

10:28 p.m. - Text from BOHN to the VICTIM: “*ok im right at the houses next door to alafaya palms on lake picket. its called lake pickett manor*”

10:29 p.m. - Text from the VICTIM to BOHN: “*Going out the back entrance from first phase it’s on the right correct correct?*”

10:40 p.m. - Text from BOHN to the VICTIM: “*if you come out the entrance on lake Pickett head towards colonial and yeah it will be on the right*”

10:51 p.m. - Text from the VICTIM to BOHN: “*Ok. I’ll call you when I’m leaving*”

10:53 p.m. - Text from BOHN to the VICTIM: "ok"

11:05 p.m. - Text from the VICTIM to BOHN: "*Leaving work now. Text me the address so I know which house I'm going to*"

11:07 p.m. - Text from BOHN to the VICTIM: "*just wen u pull in the neighborhood park somewhere in the front of the neighborhood and ill go to you*"

11:07 p.m. - Text from the VICTIM to BOHN: "ok"

11:14 p.m. - Call from the VICTIM to BOHN: No answer.

11:14 p.m. - Call from BOHN to the VICTIM: Talked or left voicemail for 25 seconds.

11:21 p.m. - Call from the VICTIM to BOHN: No answer.

11:28 p.m. - Text from the VICTIM to BOHN: "*Is this boy?*"

11:29 p.m. - Text from the VICTIM to BOHN: "*It looks different than before*"

11:29 p.m. - Call from the VICTIM to BOHN: No answer.

11:30 p.m. - Call from the VICTIM to BOHN: No answer.

11:33 p.m. - Text from the VICTIM to BOHN: "*Dude call me back. This looks and tastes like girl. I wanted boy*"

11:33 p.m. - Call from the VICTIM to BOHN: No answer.

11:35 p.m. - Text from the VICTIM to BOHN: "*Why are you ignoring me I just want to know so I can change it out*"

- 11:37 p.m. - Call from the VICTIM to BOHN: No answer.
- 11:38 p.m. - Text from BOHN to the VICTIM: *"im on the highway headed downtown"*
- 11:38 p.m. - Text from the VICTIM to BOHN: *"Hello"*
- 11:38 p.m. - Text from the VICTIM to BOHN: *"Is it boy?"*
- 11:39 p.m. - Text from the VICTIM to BOHN: *"Or not"*
- 11:39 p.m. - Text from the VICTIM to BOHN: *"Just say yes or no"*
- 11:39 p.m. - Text from the VICTIM to Rey: *"Are you around"*
- 11:40 p.m. - Text from BOHN to the VICTIM: *"yes"*
- 11:40 p.m. - Text from the VICTIM to BOHN: *"It looks different"*
- 11:40 p.m. - Text from the VICTIM to BOHN: *"Then before"*
- 11:40 p.m. - Text from Rey to the VICTIM: *"No just left. Why?"*
- 11:41 p.m. - Text from the VICTIM to BOHN: *"It better be"*
- 11:41 p.m. - Text from the VICTIM to Rey: *"Needed bars"*
- 11:41 p.m. - Text from Rey to the VICTIM: *"How many?"*
- 11:41 p.m. - Text from the VICTIM to Rey: *"2"*
- 11:42 p.m. - Text from Rey to the VICTIM: *"Raymond is home u can go see him"*
- 11:42 p.m. - Text from the VICTIM to Rey: *"Tell him I'm coming in a bit"*

11:42 p.m. - Text from Rey to the VICTIM: *"Alright"*

11:43 p.m. - Text from the VICTIM to Rey: *"Should I go to the Window"*

11:43 p.m. - Text from Rey to the VICTIM: *"Yeah ill tell him now"*

11:43 p.m. - Text from the VICTIM to Rey: *"I deleted his number so can you text it to me so I can tell him when I'm on my way"*

11:45 p.m. - Text from the VICTIM to Rey: *"Please"*

11:46 p.m. - Text from Rey to the VICTIM: *"I told him"*

11:47 p.m. - Text from the VICTIM to Rey: *"I deleted his number so can you text it to me so I can tell him when I'm on my way"*

11:48 p.m. - Text from Rey to the VICTIM: *"4079704398"*

11:49 p.m. - Text from the VICTIM to Rey: *"Thank you"*

11:51 p.m. - Text from the VICTIM to Raymond: *"I'm about to leave. Should I come to the window, because I want to talk to you.....Nothing bad just have some things I want to talk about face to face"*

11:51 p.m. - Text from the VICTIM to Raymond: *"Or Can I come inside?"*

11:52 p.m. - Call from the VICTIM to Raymond: Talked or left voicemail for 1 minute 9 seconds.

12:14 a.m. - Text from Raymond to the VICTIM: *"I left the door"*

unlocked so just be very quiet when you come in”

12:49 a.m. - Text from Raymond to the VICTIM: *“are you coming?”*

21. Based on my training, experience and knowledge of this investigation, after reviewing these texts and phone calls I believe the VICTIM set up a transaction with BOHN for \$20 worth of “boy,” a street term I know is common for heroin. I also know that “girl” is a street term referring to cocaine. the VICTIM left work and drove to meet BOHN at the entrance of Lake Pickett Manor where she purchased what she believed to be was \$20 worth of heroin, then returned home. I believe the VICTIM soon realized something did not seem right with her purchase and texted BOHN several times trying to find out if BOHN had given her something other than heroin. The VICTIM attempted to call BOHN with no answer, then texted BOHN and asked if it was in fact “boy” and also told BOHN *“It looks different than before.”*

22. The VICTIM then called BOHN an additional two more times before reiterating in a text, *“Dude call me back. This looks and tastes like girl. I wanted boy.”* BOHN continued to ignore the VICTIM and again she asked, *“Is it boy”* and then *“Or not.”* The VICTIM finally asked BOHN, *“Just say yes or no”* and BOHN responded *“yes.”* The VICTIM then stated, *“it better be.”* I believe the VICTIM was trying to determine exactly what BOHN sold her and

was worried about the possible effects of taking something other than heroin.

23. The VICTIM then began a conversation with an individual known as “Rey” to ask for “2 bars,” which typically refers to Alprazolam (which is most commonly known as Xanax). Rey told her he/she was not at his/her house, but the VICTIM could get the bars from “Raymond.” Rey set up the transaction between the two of them, but based on the texts it appears the VICTIM never bought the Xanax.

24. Historical cell site records from the VICTIM’s phone indicate that the calls between the VICTIM and BOHN between 11:14 p.m. to 11:52 p.m. on December 15, 2017, were routed through a cellular tower located at 13770 E Colonial Drive in Orlando, Florida. This cellular tower is near the location BOHN told the VICTIM to meet him to buy heroin. This cell tower location is also near the VICTIM’s house (*i.e.*, the Residence), which is near the location she met BOHN to buy what she believed was heroin. The VICTIM’s phone did not communicate with any other cell towers.

Coroner’s Report

25. On December 17, 2017, at approximately 8:10 a.m., Doctor Jennifer Park of the Orange County Medical Examiner’s office, completed the autopsy of the VICTIM and determined the cause of death as fentanyl and cocaine intoxication.

26. On March 8, 2018, law enforcement met with Doctor Park to get clarification on the toxicology which indicated a presence of Fentanyl, Cocaine, Morphine, Diphenhydramine, and Alprazolam. She explained each of these in more detail as indicated below:

27. The Alprazolam of 0.146 mg/L would be high for an average person, but could be considered “normal” for a frequent user after they build a tolerance to its effects. Such an example would be the VICTIM’s suspected use of Alprazolam (Xanax) over an approximate 15 year period.

28. The Morphine of 0.040 mg/L would be considered a low amount of an opiate. Several Opiates fall under the “Morphine” group and are able to be separated into subgroups based on their metabolites. No metabolites were found in the VICTIM’s system which indicates she most likely died before her body could begin to break down the opiate. This could be explained if the last mixture of narcotics that she ingested contained a small amount of heroin and she died soon afterwards.

29. When cocaine is ingested it does not stay in the system for long because it initially breaks down into the metabolite known as Ecgonine Methyl Ester. Ecgonine Methyl Ester further breaks down into a metabolite known as Benzoyllecgonine which stays in the system for several days. The Cocaine of 0.055 mg/L and its initial metabolite of Ecgonine Methyl Ester

0.457 mg/L are consistent with recent use of cocaine prior to death because the cocaine was still present. The presence of 1.713 mg/L of Benzoylcegonine is consistent with cocaine use within the past several days. This shows the VICTIM used cocaine prior to her death and at least one additional time in the days preceding.

30. The Fentanyl of 9.96 mg/L in the system, but with none of the metabolites known as Norfentanyl in her system shows the VICTIM died shortly after ingesting Fentanyl.

31. The Diphenhydramine of 0.145 mg/L is within normal range. Diphenhydramine is an antihistamine.

32. The Acetaminophon of 0.66 mg/L is within normal range. Acetaminophon is a fever reducer similar to tylenol.

33. Thus, based on my training, experience and the facts of this investigation, I believe that the drugs found in the Green Bag were provided by BOHN and resulted in the VICTIM's death.

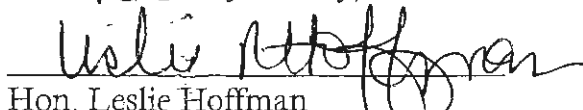
CONCLUSION

34. Based upon the information in this affidavit, I submit that there is probable cause to believe that Jonathan BOHN, also known as (a/k/a) "Jonah," distributed a controlled substance that resulted in death, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).



Raymond S. Coolidge, Jr.
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me
this 16th day of May, 2019.



Hon. Leslie Hoffman
United States Magistrate Judge