

AFFIDAVIT

I, Colin Woods, do under oath depose a state:

I. INTRODUCTION

Agent Background

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have authority to enforce the criminal laws of the United States and to make arrests. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been an FBI Special Agent since 2006. I am currently assigned to the Providence, Rhode Island (RI), Resident Agency (RA) of the FBI, specifically the RI Safe Streets Task Force (SSTF). I have been assigned to the Providence RA since March of 2010. Prior to transferring to the Providence RA, I was assigned to the Norfolk, Virginia division of the FBI. Before entering duty as a Special Agent, I served as a Captain in the U.S. Army.

2. During my tenure as a Special Agent, I have been responsible for more than 100 illicit drug, gang, firearms and violent crime related investigations. I have been the affiant on numerous arrest and search warrants, cellular telephone and Global Positioning Satellite (GPS) tracking warrants and wiretap applications. I have conducted extensive physical and wire surveillance, executed numerous search warrants, reviewed and listened to thousands of taped drug conversations, and analyzed drug ledgers maintained by traffickers. I have also interviewed numerous

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users and distributors of illicit drugs. Therefore, I am thoroughly familiar with the manner in which illegal drugs are imported and distributed, the method of payment for drugs, and the efforts of persons involved in drug trafficking activity to avoid detection by law enforcement, as well as methods used to finance drug transactions and launder drug proceeds. In the same way, I am thoroughly familiar with the vernacular of the drug trade, common codes and jargon.

3. Additionally, based on my training and experience and my participation in other controlled substance investigations, I know that it is common for drug dealers to: "front" (provide on consignment) controlled substances to their customers; conceal contraband, the proceeds of drug sales, and store drugs and cash in remote locations sometimes referred to as "stash houses;" maintain records of drug transactions; and use cellular telephones to facilitate their drug distribution operations. I also know that drug trafficking is an illicit business and an ongoing process requiring the development, use and protection of a communication network to facilitate daily drug distribution. Drug dealers use various methods to thwart law enforcement detection, including frequently changing cellular phones and vehicles, using various aliases, and using coded communications. Based on my experience in drug investigations, I know that drug traffickers frequently refer to illicit drugs in guarded conversations and frequently use code words when referring to controlled substances or money.

The Execution of Search Warrants and the Conduct of Drug Traffickers

4. Based upon my training and experience and my participation in this investigation, I know that:

a. Drug traffickers often place assets, including apartments, houses, vehicles, and telephones, in names other than their own to avoid detection of these assets by government agencies. Although these assets are held in other names, the drug dealers actually own or use these assets and exercise dominion and control over them. Records relating to these assets are frequently found in their residences and other locations controlled by them.

b. Persons involved in drug trafficking conceal in their vehicles, residences, and businesses controlled substances, large amounts of currency, financial instruments, precious metals, jewelry, and other items of value, and/or proceeds of drug transactions, and evidence of financial transactions relating to obtaining, transferring, secreting, or spending money made from engaging in narcotic trafficking activities. Money, tangible property and records relating to these assets are frequently found in their residences and other locations controlled by them.

c. Drug traffickers often carry, on their person or maintained in secure locations, weapons to protect themselves and their controlled substances from theft by other users, traffickers, or criminals, and from seizure by law enforcement agencies. Drug traffickers store these weapons in their residences, vehicles, and/or businesses and stash houses, or other locations controlled by them.

d. Drug traffickers commonly maintain addresses or telephone numbers in books, papers, computers, and cellular telephones that reflect names, addresses, and/or telephone numbers for their associates in the drug trafficking organization, even if that information may be in code. These types of records are sometimes maintained in computers, cellular telephones or other electronic data storage devices. Records and electronic devices of this sort are also frequently found on the persons of drug traffickers or in their residences, motor vehicles, and other locations controlled by them.

e. Drug traffickers frequently take, or cause to be taken, photographs and/or videos of themselves, their associates, or their property. Records in the form of photographs and/or videos are often found in the residences, offices, or other places under the control of drug traffickers, and provide valuable evidence of conspiratorial relationships. Records of this type are sometimes in hard copy but increasingly found stored on computers, cellular telephones, thumb drives, and other items possessing the capability of storing electronic data.

f. Drug traffickers often keep equipment and materials for packaging, cutting, weighing, manufacturing, and distributing controlled substances in their homes, stash houses or other locations controlled by them. That drug paraphernalia often includes, but is not limited to, scales, plastic wrap, plastic bags, surgical gloves, presses, and cutting agents as well as aromatic substances such as soap, dryer sheets, wood shavings, and heat sealers all of which are used to mask the odor of illegal drugs in an attempt to avoid detection by drug detection dogs. Large-scale drug traffickers

sometimes use money-counting machines to help count and sort the proceeds of drug trafficking.

g. Drug traffickers commonly consign controlled substances to their clients and couriers. They frequently maintain books, records, receipts, notes, ledgers, airline tickets, money orders, and other papers relating to the transportation, ordering, sale, and distribution of controlled substances. Records of this type are kept in locations where traffickers have ready access to them, including on their person or in their residences, vehicles, businesses, smart telephones, tablets and personal computers. Drug traffickers also normally maintain these items and records for long periods of time regardless of whether their value to the drug dealer has diminished. Oftentimes, this type of evidence is generated, maintained, and then forgotten about. Thus, documents that one would think a prudent person would destroy because of their incriminatory nature are still possessed months or even years after the documents came into the possession of the drug dealer. Oftentimes, these individuals do not even realize the incriminatory nature of the documents they keep. Documentary evidence dating back years is sometimes found in residences and other locations controlled by traffickers.

h. Persons who reside in or who are using a particular residence will often have documents, bills, and correspondence which list their names and addresses in that residence. Documents such as personal telephone books, address books, utility company receipts, keys, personal letters, rent receipts, mortgage documents, clothing and other articles of personal property would tend to establish residency at a particular location and provide valuable evidence concerning ownership and control over areas in

which drugs or other incriminating evidence are found. Records and documents of this type may also be found in hard copy or stored electronically on computers, mobile telephones, and other media that store data electronically.

Purpose

5. This affidavit is submitted in support of Applications for Arrest Warrants for:

- a) **HECTOR** Valdez ¹ along with a Criminal Complaint charging him with: Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More of Heroin; Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses and; Being an Alien Who Has Illegally Reentered the United States after Deportation. All in violation of 21 U.S.C. §§ 841 (a)(1), (b)(1)(A), 843(b); 18 U.S.C. § 2; and 846; 8 U.S.C. §§ 1326 (a) and (b)(2).

- b) **JUAN** Valdez along with a Criminal Complaint charging him with: Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More of Heroin; Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses and; Being an Alien Who Has Illegally Reentered the United States after Deportation. All in violation of 21 U.S.C. §§ 841 (a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2; 8 U.S.C. 1326 §§ (a) and (b)(2).

- c) **CLAUDIO** Valdez along with a Criminal Complaint charging him with: Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More

¹ In this affidavit, I will generally refer to those persons to be arrested by last name only, capitalized and in bold font. However, there are three brothers sharing the surname Valdez. I will refer to the Valdez brothers by both their first and last names, capitalizing their first names in bold font to distinguish between them.

of Heroin; Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses and; Being an Alien Who Has Illegally Reentered the United States after Deportation. All in violation of 21 U.S.C. §§ 841 (a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2; 8 U.S.C. 1326 §§ (a) and (b)(2).

- d) Tanya **CROTEAU** along with a Criminal Complaint charging her with Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.

- e) Alexandra Garcia, alias Sandra **RODRIGUEZ**, alias Jane Doe along with a Criminal Complaint charging her with Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More of Heroin and Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.

- f) Jennifer **PERDOMO** along with a Criminal Complaint charging her with Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. §2.

- g) John Doe, aka Hiram Modesto, aka Manuel, aka **COMPADRE** along with a Criminal Complaint charging him with Conspiracy to Distribute Cocaine, Cocaine Base, and a Kilogram or More of Heroin; and Unlawful Use of Communication Facilities in Committing or Facilitating the

Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.

- h) John Doe, alias Orlando **ROBLES**, alias Vladimir ARIAS, alias Franklin ARIAS along with a Criminal Complaint charging him with Conspiracy to Distribute a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.
- i) Jafir **MUNIR** along with a Criminal Complaint charging him with Conspiracy to Distribute cocaine and 100 grams or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841 (a)(1) and (b)(1)(B); 846 and 843(b).
- j) John Doe, alias Jesus **DELGADO**-Sierra, aka Carlito, aka Carlos: along with a Criminal Complaint charging him with Conspiracy to Distribute Cocaine Base and a kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.
- k) Agustin **LEONARDO**, Jr along with a Criminal Complaint charging him with Conspiracy to Distribute a Kilogram or more of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.

- l) John Doe alias **JOVAN** along with a Criminal Complaint charging him with Conspiracy to Distribute a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.
- m) Manuel **CASTILLO** aka Don along with a Criminal Complaint charging him with Conspiracy to Distribute Cocaine and a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.
- n) Luis **PELLOT** aka Watchie with a Criminal Complaint charging him with Conspiracy to Distribute Cocaine and a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.
- o) Ramon **GUZMAN** aka Mariano Gusman with a Criminal Complaint charging him with Conspiracy to Distribute one hundred grams or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841 (a)(1) and (b)(1)(B); 846 and 843(b).
- p) Wandy **DIAZ**, alias Jose DeJesus-Escbales, aka Canelo with a Criminal Complaint charging him with Conspiracy to Distribute Cocaine and a Kilogram or More of Heroin and Unlawful Use of Communication Facilities in Committing or Facilitating the Commission of Felony

Controlled Substance Offenses. All in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 843(b) and 846; 18 U.S.C. § 2.

6. This affidavit is also made in support of Applications for Search Warrants for the following properties, their common areas and appurtenances:

- a) **HECTOR** and **CLAUDIO** Valdez's residence located at 34 Burnside Ave., Apartment 3F, Woonsocket, RI and further described Attachment A.
- b) **CROTEAU**'s residence located at 34 Burnside Ave., basement apartment, Woonsocket, RI and further described Attachment A.
- c) **PERDOMO**'s residence located at 88 Barrows St., Apartment 2, Providence, RI and further described Attachment A.
- d) **LEONARDO**'s residence located at 139 Atlantic Ave., Providence, RI and further described Attachment A.
- e) **CASTILLO**'s residence located at 223 Massachusetts Ave., Providence, RI and further described Attachment A.
- f) **GUZMAN**'s residence located at 35 DeSoto St., Apartment 2, Providence, RI and further described Attachment A.
- g) A stash house at 87 Dulude Ave., Apartment 1R, Woonsocket, RI and further described Attachment A.
- h) A stash house at 103/105 Woodbine St., Cranston, RI and further described Attachment A.

7. Finally, this Affidavit is submitted in support of Seizure Warrants for motor vehicles used to facilitate drug trafficking offenses:

- a) 2006 Infiniti M45, gray, bearing RI license plate 565 825, VIN# JNKBY01E06M203465, registered to Tanya **CROTEAU**, at 335 South Main St., Apt. 3, Woonsocket, RI (the gray Infinity).

- b) 2011 Ford Taurus, white, bearing MA license plate 7GY-531, VIN# 1FAHP2HW7BG1244334, registered to Casandra Garcia, at 24 Aberdeen St., Apt. 1, Milton, MA (the white Taurus).
- c) 2000 BMW Station Wagon, silver, bearing RI license plate 451-613, VIN# WBAAR3340YJM00301, registered to Tanya **CROTEAU**, at 335 South Main St., Apt. 3, Woonsocket, RI (the silver BMW).
- d) 2001 Ford Ranger, black, bearing RI Combination plate 82848, VIN# 1FTZR15E91TA38687, registered to Maria Urena, at 50 Arch St., 3rd Floor, Providence, RI (the black Ranger).
- e) 2005 Porsche Cayenne, black, bearing RI license plate 341-764, VIN# WP1AB29P35LA63706, registered to Elsa Alvarez, at 126 Burnside Ave., Apt. 1, Woonsocket, RI (the black Porsche).
- f) 2010 Chevy Silverado, black, bearing RI combination plate 115201, VIN# 1GCSKSE33AZ129025, registered to Hector Rojas, at 378 Potters Ave., Providence, RI (the black Silverado).
- g) 2006 Volvo XC90, white, bearing RI license plate PX-961, VIN# YV4CZ592861225769, Registered to Marvin Liriano, at 33 Reynolds Ave., 1st Floor, Providence, RI (the white Volvo).

8. Probable cause exists to believe that the vehicles to be seized were used to facilitate violations of 18 U.S.C. § 841, relating to trafficking in controlled substances, I am therefore requesting authority to seize the above listed vehicles. Probable cause exists to believe that the vehicles are subject to forfeiture, pursuant to 18 U.S.C. § 853 (criminal forfeiture of assets involved in or used to facilitate drug trafficking), § 881(a) (civil forfeiture of assets involved in or used to facilitate drug trafficking), and/or 21 USC § 881(d) & 18 USC § 981(d) (administrative forfeiture of assets related to assets used to facilitate drug trafficking). There is also probable cause to believe that a restraining order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of each of the vehicles for forfeiture. I know from my training and experience that once

their unlawful activities are discovered by law enforcement authorities, narcotics traffickers quickly encumber, transfer, or otherwise conceal their assets to avoid the seizure and forfeiture thereof, notwithstanding court orders to the contrary. Vehicles are easily moved, concealed, and transferred. Leaving the vehicles subject to a restraining order but still in the custody of the investigative targets will not assure their availability for forfeiture.

Background, Sources, Methods and Means

9. This affidavit is based on my own investigation and on information reliably provided to me by other federal, state, and local law enforcement agents in Rhode Island, New England and Nationally. I have relied on information supplied by Agents, Troopers, Detectives and Officers from the FBI, the Drug Enforcement Administration (DEA) Providence and Boston Resident Agencies, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HIS), Rhode Island State Police (RISP); Providence Police Department (PPD), Woonsocket Police Department (WPD), Central Falls Police Department (CFPD), Cranston Police Department (CPD) and the Rhode Island Department of Corrections (RIDOC). I have also relied on reports of investigations that I have prepared or that were prepared by other law enforcement agents; business records; public and law enforcement databases; and the result of several Court Ordered wiretap investigations.² I have also relied on

² The conversations overheard in conducting these Court ordered wiretaps were primarily conducted in the Spanish language. I do not speak Spanish. I have therefore relied on translations provided by Spanish speaking monitors who recorded summaries of conversations they overheard, to the best of their abilities, in line-sheets of monitored conversations. I do not yet have fully translated transcripts to use in reporting the content of the monitored conversations contained in this affidavit.

information provided to me and to other law enforcement agents by cooperating sources who I will refer to only as CS#1 and CS#2.³

Cooperating Sources

10. During the course of the current investigation of the VALDEZ DTO, I and other law enforcement investigators have received information two Cooperating Sources concerning the drug trafficking activities of the three Valdez brothers and their accomplices. To the best of my knowledge, the Cooperating Sources do not know each other nor are they aware that law enforcement has multiple Cooperating Sources providing information in this investigation. The information provided by the two Cooperating Sources has been consistent in that both sources have personal knowledge that **HECTOR** Valdez, **JUAN** Valdez and **CLAUDIO** Valdez are high-level cocaine and heroin traffickers. That is, in addition to other measures of reliability, the two Cooperating Sources have unknowingly cross-corroborated each other.

Cooperating Source #1

11. CS#1 has been providing the government with information regarding **HECTOR** Valdez since approximately August 2016. CS#1 has a criminal history that includes felony drug convictions and a conviction for Armed Robbery. He is cooperating in an effort to obtain a more lenient sentencing recommendation from the government in a pending investigation. He has also been provided with subsistence

³ I will refer to the Confidential Sources, upon whose information I have relied, simply as Cooperating Sources or abbreviated "CS" rather than by true names. I will also use masculine pronouns regardless of gender. All in order to protect their identities.

level compensation during the period of his cooperation. Since the start of his cooperation, CS#1 has provided me with information that I or other law enforcement agents have independently corroborated through toll records, recorded conversations, video recordings, physical surveillance, and other law enforcement confidential sources. CS#1 agreed to be recorded and to testify, if required. He has communicated with **HECTOR** Valdez regarding drug deals by voice and text over telephones used by **HECTOR** Valdez and has purchased heroin, fentanyl, cocaine and crack cocaine from **HECTOR** Valdez while under law enforcement supervision and while being recorded. CS#1 has proven to be a credible and reliable informant. I have never found CS#1 to have knowingly provided false information.

12. Initially, CS#1 reported knowing of a high-level Dominican drug trafficker and a white female drug runner that worked for him. CS#1 said that he had known the pair for approximately two years and that they distributed drugs throughout RI and MA.

13. CS#1 provided a physical description of the two, descriptions of vehicles they utilized and several phone numbers associated with the pair. Based upon the information provided by CS#1, I showed CS#1 driver's license photos of **HECTOR** Valdez and **CROTEAU**. CS#1 positively identified both **HECTOR** Valdez and **CROTEAU** as the individuals he had known as drug traffickers for the last two years.

14. CS#1 reported that he was introduced to **HECTOR** Valdez through a mutual friend. At the time of the introduction, CS#1 understood that his friend had a longstanding drug relationship with **HECTOR** Valdez. According to CS#1, that friend

had also been buying large quantities of heroin from **HECTOR** Valdez for a long period of time.

15. CS#1 admitted that in 2015 he had illegally purchased heroin on multiple occasions from **HECTOR** Valdez in increments of 50-100 grams. CS#1 explained that the drug transactions were always arranged by calling **HECTOR** Valdez, however, the drugs were occasionally delivered by **CROTEAU**. CS#1 reported that the drugs were delivered in the black Porsche, gray Infiniti or a silver BMW.

16. Since October 2016, CS#1 has participated in many controlled buys from **HECTOR** Valdez and other controlled payments to him as set forth in the summary chart that is a part of this affidavit. Those transactions were all video and/or audio recorded. On each occasion, the controlled buys were arranged by CS#1 calling or texting **HECTOR** Valdez on his various cellular telephones phones. All calls pertaining to the controlled buys were made in my presence or in the presence of a law enforcement officer assisting in the ongoing investigation. All calls by CS #1 were recorded and verified by toll records.

17. On approximately half of the occasions, **HECTOR** Valdez sent **CROTEAU** to deliver the drugs or pick-up the money. On some occasions, **CLAUDIO** Valdez, **JUAN** Valdez and/or Emely **GONZALEZ** accompanied **HECTOR** Valdez or **CROTEAU** to meet with CS #1. **HECTOR** Valdez and/or **CROTEAU** used the black Porsche, gray Infiniti and silver BMW to deliver the drugs during the controlled buys.

Cooperating Source #2

18. CS#2 has been providing the government with information regarding **JUAN** Valdez and **CLAUDIO** Valdez since approximately September 2016. CS#2 has a criminal history that includes multiple felony drug convictions and a firearm related conviction. While cooperating, CS#2 has been compensated. Since the start of his cooperation, CS#2 has provided information to me that I and other law enforcement agents have independently corroborated through toll records, monitored and recorded conversations, video recordings, physical surveillance, and other law enforcement confidential sources. However, CS#2 has requested that his identity be kept confidential and is not willing to testify. Consequently, he has not been recorded and the drug deals that he participated in have not been charged. When CS#2 has communicated with **JUAN** Valdez regarding drug deals over telephones he was monitored by law enforcement officers. He has purchased heroin from **JUAN** Valdez and **CLAUDIO** Valdez while under law enforcement supervision and subject to visual surveillance. CS#2 has proven to be a credible and reliable informant. I have never found CS#2 to have knowingly provided false information.

19. Initially, CS#2 reported knowing a high-level Dominican drug trafficker named "Tony" that distributed heroin and cocaine with his brother. CS#2 reported that he has known "Tony" to be a drug dealer for at least three years. CS#2 admitted that during those three years he had illegally purchased heroin on numerous occasions from "Tony" and his brother. He also recently told me that "Tony" used the name "Canita." Based on the information provided by CS#2 and other investigative information

provided I showed him pictures of **JUAN** Valdez and **CLAUDIO** Valdez. CS#2 positively identified **JUAN** Valdez as the person he knows as "Tony" and **CLAUDIO** Valdez as the person he knows as "Tony's brother."

20. CS#2 also said that **JUAN** Valdez primarily operated a white Ford Taurus bearing RI license plate 312 169 (the white Taurus). According to the RI DMV, the white Taurus was registered to Maria Urena (DOB 02/10/1973). CS#2 reported that **CLAUDIO** Valdez primarily operated a black Ford Ranger bearing RI license plate 82848 (the black Ranger). According to the RI DMV, the black Ranger is also registered to Maria Urena. CS#2 stated that he suspects that the white Taurus and the black Ranger both have hidden compartments installed in them, which are used to conceal drugs and cash. CS#2 suspects that because when they have delivered drugs to him, he has observed them manipulating something near the front dashboard of their respective vehicles prior to the drug delivery.

21. In October of 2016, the SSTF began making controlled buys using CS#2. On each occasion, the controlled buys were arranged by CS #2 calling one of the series of telephone numbers that he had been provided with. All calls pertaining to the controlled buys referenced in the chart were made and overheard in my presence or in the presence of law enforcement officers assisting in the ongoing investigation and verified by toll records.

22. On most occasions, **JUAN** Valdez personally delivered the heroin to CS#2 while operating the white Taurus. On some occasions, **CLAUDIO** Valdez delivered the heroin in the black Ranger. During the course of the controlled buys, law enforcement

officers also positively identified "Tony" as **JUAN** Valdez and "his brother" as **CLAUDIO** Valdez.⁴

Wiretaps and Electronic Surveillance

23. During the course of my investigation of the VALDEZ DTO I sought and obtained authorization to install pen registers and trap and trace devices (pen-trap devices) on some of the telephones discussed in this affidavit:

- a. On November 4, 2016, United States Magistrate Judge Lincoln D. Almond authorized the installation of pen-trap devices on a telephone used by HECTOR Valdez for 60 days;
- b. On December 28, 2016, United States Magistrate Lincoln D. Almond authorized the installation of pen-trap devices on a second phone used by HECTOR Valdez for a period of 60 days;
- c. On November 21, 2016, United States Magistrate Judge Patricia A. Sullivan authorized the installation of pen-trap devices on a phone used by JUAN Valdez for a period of 60 days;
- d. On December 28, 2016, United States Magistrate Judge Lincoln D. Almond authorized the installation of pen-trap devices on a second phone used by JUAN Valdez for a period of 60 days.

⁴ On October 11, 2016, the PPD conducted a traffic stop of the black Ranger following a controlled buy. The driver and only occupant of the vehicle was **CLAUDIO** Valdez. During the traffic stop, **CLAUDIO** Valdez provided the police officer with RI Driver's License number 570537 issued on April 7, 2015 with his picture on it but bearing the name of Carlos Giovanetti Torres (DOB 08/05/1977). Further investigation revealed that on October 20, 2003, **CLAUDIO** Valdez was issued MA Driver's License number S19039222 bearing his photograph but the name of Luis Hernandez (DOB 10/14/1977). I have determined that both Torres and Hernandez are the actual identities of other men born in Puerto Rico.

On November 7, 2016, the PPD and SSTF conducted a traffic stop of the white Taurus. The driver and only occupant of the vehicle was **JUAN** Valdez. During the traffic stop, **JUAN** Valdez provided the police officer with RI Driver's License number 2932417 bearing his picture but issued in the name Edwin Garcia (DOB 06/21/1970) on October 19, 2016. I have also determined that Garcia is the true identity of another man born in Puerto Rico.

24. During the course of my investigation of the VALDEZ DTO I applied for and obtained warrants to seize GPS data on telephones discussed in this affidavit:

- a. On February 15, 2017 United States Magistrate Judge Patricia A. Sullivan authorized the seizure of GPS data from (781) 244-4738.
- b. On February 22, 2017 United States Magistrate Judge Lincoln D. Almond authorized the seizure of GPS data from (781) 300-1459.

25. During the course of my investigation of the VALDEZ DTO I sought and obtained authorization to monitor telephones used by the Valdez brothers.

- a. On January 30, 2017 Chief Judge William E. Smith of the District of Rhode Island authorized the interception of wire communications involving the Target Subjects/Interceptees on Target Telephones I and II in Misc. No. 17 – 11. Interceptions began that same day. Monitoring on Target Telephone I (which was used by **JUAN** Valdez) was discontinued on February 17, 2017 and monitoring on Target Telephone II (which was used by **HECTOR** Valdez) stopped on February 20, 2017.
- b. On February 7, 2017 Judge John J. McConnell, Jr. of the District of Rhode Island authorized the interception of wire communications involving the Target Subjects/Interceptees on Target Telephone III (which was used by **JUAN** Valdez) in Misc. No. 17 - 12. Interceptions began on February 8, 2017 and expired on March 9, 2017.
- c. On March 6, 2017, Judge John J. McConnell, Jr. of the District of Rhode Island authorized the interception of wire communications involving the Target Subjects/Interceptees on Target Telephone IV (which was used by **CLAUDIO** Valdez) in Misc. No. 17 - 15. Interceptions began that same day. The Order expired on April 5, 2017.
- d. On March 10, 2017, Judge John J. McConnell, Jr. of the District of Rhode Island authorized the continued interception of wire communications involving the Target Subjects/Interceptees on Target Telephone III (which

was used by **JUAN** Valdez) in Misc. No. 17 - 12. Interceptions began on March 11, 2017 and were discontinued on March 30, 2017.

- e. On March 27, 2017, Chief Judge William E. Smith of the District of Rhode Island authorized the interception of wire communications involving the Target Subjects/Interceptees on Target Telephone V (which is used by **JUAN** Valdez) in Misc. No. 17 - 16. Interceptions began on March 21, 2017. The Order will expire on April 26, 2017.

The Investigation

26. I and other law enforcement agencies have investigated **HECTOR** Valdez for several years. He has been identified in a number of other investigations, some of which are further described in this affidavit. His brothers, **JUAN** Valdez and **CLAUDIO** Valdez, have also been identified in previous investigations. I have been continuously conducting the current investigation of the Valdez brothers and their drug trafficking organization (the VALDEZ DTO) for over six months. Over the course of this investigation, I have been able to partially learn the identities of foreign sources of supply like, The Maestro (Dominican Republic) and The Doctor (Mexico) as well as a local supplier, **CASTILLO**. I have learned the identities of certain accomplices and coconspirators in the VALDEZ DTO, including **CROTEAU, ROBLES, RODRIGUEZ, PERDOMO, COMPADRE, DIAZ and PELLOT**. I have also been able to learn the identities of many drug customers of the VALDEZ DTO, the largest of which are themselves drug traffickers with their own customer bases, including **MUNIR, LEONARDO, DELGADO, JOVAN and GUZMAN**.

Prior Investigations

27. **HECTOR** Valdez' was arrested, in February of 2007, following a traffic stop by the RISP. During that same period of time, he was also the subject of an FBI investigation that involved undercover purchases of drugs from him. That investigation did not result in any arrest or prosecution. During the traffic stop, however, troopers located a hidden compartment (sometimes referred to as a "hide" by drug dealers) in the vehicle that was being operated by him. The sophisticatedly constructed hide was located behind the glove box in the front dashboard of the vehicle and was designed to be opened by activating a series of electrical components within the vehicle. Once the correct sequence of components was activated, a hydraulic piston opened the hidden compartment. In my experience, sophisticated hides of this type are expensive to construct and are used by skilled drug dealers to avoid detection and arrest; all of which suggests to me that **HECTOR** Valdez has been in the business of drug dealing at a highly sophisticated level since at least 2007. Also, based on reliable informant information, surveillance and monitored conversations I believe that the gray Infinity, white Taurus, black Ranger, and black Silverado all have hides.

28. In 2012, I was the case agent in a wire-tap investigation conducted in the District of RI. As in this case, that investigation targeted a group of Dominican drug traffickers who were receiving kilogram quantities of heroin from a Mexican source of supply. The investigation resulted in the seizure of multiple kilograms of heroin, more than \$400,000 and the federal conviction of 14 defendants. Two of the defendants, Ariel Hassell and Cesar Romero, participated in post-arrest interviews subject to the

protection of proffer letters. During the proffer sessions, both Hassell and Romero reported that they each used to deliver drugs on behalf of an individual named "Tony," who matched the physical description of **JUAN** Valdez and had similar ties to both RI and MA. As described in this Affidavit, CS#2 also knew **JUAN** Valdez as "Tony." All of which suggested to me that **JUAN** Valdez has also been in the business of dealing drugs at a high level for a substantial period of time.

29. In January 2013, I was contacted by PPD Narcotics Detectives regarding an individual known to them only as "Arnaldo Lopez (DOB 12/15/1970)" who was using MA driver's license S28836640 (issued 08/02/2012). According to the PPD, they had received information from a confidential source that an individual named "Arnaldo Lopez" was selling large quantities of heroin and cocaine in the Providence Metropolitan area. The confidential source, who was not in a position to testify, established his reliability (in part) by making multiple undercover purchases of heroin from "Arnaldo Lopez" and a drug runner he employed. During the PPD investigation, they identified Lopez' runner as **CROTEAU**. During that investigation, PPD Detectives observed that both **CROTEAU** and "Arnaldo Lopez" used a gray Infiniti M45, bearing RI license plate 565 825, (the gray Infiniti) to deliver drugs. According to RI DMV records, the gray Infiniti is registered to **CROTEAU**. Based upon the information provided by the PPD, I was able to determine that Arnaldo Lopez was the actual identity of a person of Puerto Rican birth that **HECTOR** Valdez had fraudulently used to obtain a driver's license (in that name and with that date of birth) but bearing a photograph of **HECTOR** Valdez. During the course of my investigation I and other law

enforcement investigators have observed **HECTOR** Valdez operating the gray Infiniti on a regular basis. The drug relationship of **HECTOR** Valdez and **CROTEAU** dating back to as early as 2013 suggests that she is a long time and trusted coconspirator in the VALDEZ DTO.

30. Further investigation revealed that **HECTOR** Valdez was issued RI driver's license number 3030038 in the name of Jose Ocasio (DOB 05/26/1969). I have also identified Jose Ocasio as a male of Puerto Rican birth, with that date of birth whose identity was fraudulently used in obtaining this license bearing **HECTOR** Valdez's picture. That license was issued on May 26, 2011. Later that year, on November 21, 2011, the PPD made an arrest for Driving Under the Influence of Alcohol (DUI). The operator produced RI driver's license number 3030038 in the name of Jose Ocasio (DOB 05/26/1969) as his identification. There is still an active arrest warrant for the arrest of "Jose Ocasio" stemming from a failure to appear for court hearings related to his DUI arrest. I therefore believe that there is an active warrant for **HECTOR** Valdez's arrest and that the DUI arrest of **HECTOR** Valdez, using the license issued in the name Jose Ocasio, is what led him to switch to the new license fraudulently issued in the assumed identity "Arnaldo Lopez."

The Related Boston Investigation

31. On December 20, 2016, CS#2 reported that **JUAN** Valdez called him from (857) 361-8476 (Target Telephone I) and told him that Target Telephone I was now his new phone number. According to CS#2, **JUAN** Valdez said that several of his friends were arrested in Massachusetts on December 13, 2016 by the DEA and therefore, he had

to switch his phone number. Target Telephone I, which was the first telephone I was authorized to monitor in this case, was a pre-paid T-Mobile cellular phone, with no subscriber information, activated on December 13, 2016, the same day as the Boston DEA raids.

32. I am aware that on December 13, 2016, the Boston DEA office executed approximately 20 federal arrest warrants related to heroin and cocaine trafficking (the Boston DEA Investigation). I believe that these are the friends and the arrests to which **JUAN** Valdez was referring. Boston DEA also executed numerous search warrants as part of that investigation. In addition to the arrests, the Boston DEA Investigation resulted in the seizure of numerous firearms, approximately eight kilograms of heroin, \$500,000 in cash and luxury vehicles. The Boston DEA Investigation also involved the use of court authorized wiretaps. I learned from the Boston DEA Investigators that **JUAN** Valdez had been intercepted on their wiretaps.

33. As part of the Boston DEA Investigation, on July 1, 2016 United States District Court Judge George A. O'Toole authorized T-III wire intercepts of telephone number (857) 829-7917 being used by Starling Gonzalez (Gonzalez's phone). From approximately July 16, 2016 to November 2, 2016 Boston DEA investigators intercepted an individual engaged in incriminating conversations on a telephone known to be used by **JUAN** Valdez, (857) 218-0742.⁵

⁵ Among other reasons, that I believe the person using that telephone was **JUAN** Valdez is because that was the first number that CS#2 used to arrange controlled buys with **JAUN** Valdez during the period of September to November 2016 and surveillance established that it was **JUAN** Valdez using that telephone.

34. Based on call summaries and draft transcripts provided to me by the Boston DEA, I believe that Gonzalez and **JUAN** Valdez, were engaged in conversation about their respective drug trafficking operations. For example, on July 16, 2016, Gonzalez called **JUAN** Valdez and said, "I'm calling you to tell you that ... the other one at 34." **JUAN** Valdez responded, "You know I barely move that stuff ... I get some to take care of people, but I don't grab a lot of that stuff ... you know that my stuff is the grease." Gonzalez said, "I won't offer from the other one because I imagine that you have, because you haven't called." **JUAN** Valdez responded, "No, I have, I'm getting good prices for the expensive one." Gonzalez observed, "If you are buying for under 55, you are good." **JUAN** Valdez informed Gonzalez, "No, I'm buying it at 55. That thing is like a river around here. There is a lot around."

35. Based on my training and experience, I believe that "grease" or the "expensive one" were references to heroin that are used by heroin dealers in guarded conversations and that "the other one" was a coded reference to cocaine. I also know that the price for a kilogram of heroin was approximately \$55,000 per kilogram and that the price for a kilogram of cocaine was approximately \$34,000. Therefore, the reference to the number "55" was a reference to the price of a kilogram of heroin and "34" was a reference to the price of a kilogram of cocaine. In this conversation, Gonzalez called **JUAN** Valdez and offered to sell him cocaine at \$34,000 per kilogram. In response, **JUAN** Valdez told Gonzalez that he was not selling a lot of cocaine and that he primarily sells heroin, which he is buying from another supplier at \$55,000 per kilogram.

36. On another occasion (August 29, 2016) Gonzalez and **JUAN** Valdez, spoke several times. During the conversations, Gonzalez confirmed that there was “stuff around.” **JUAN** Valdez asked about the price and Gonzalez said it was “60.” He later explained that it was “straight from the Mexicans.” **JUAN** Valdez told Gonzalez, “Listen to what you are going to tell him. You tell him ... you are responsible ... tell him that if the stuff is good, for him to bring me two. Listen carefully ... tell him to give me the price for two. If he gives you a reasonable price for two, then he can head out today. You understand?”

37. Based on my training and experience, I believe that **JUAN** Valdez and Gonzalez were discussing the purchase of two kilograms of heroin. Buying in bulk, **JUAN** Valdez was trying to get a better price than \$60,000 for a kilogram by offering to purchase two kilograms in a single order instead of just one. He was willing to pay for good quality heroin – “straight from the Mexican’s” and told Gonzalez to be responsible for the negotiations. If he could get a “reasonable price” **JUAN** Valdez was prepared to accept delivery of two kilograms of heroin that same day.

38. As part of the same Boston DEA investigation, on October 28, 2016 United States District Judge William G. Young authorized T-III wire intercepts of telephone number (857) 233-3445 being used by Charles Torres aka Daniel Bautista (Torres). During the course of that wiretap investigation, phone calls between Torres and **JUAN** Valdez using (617) 818-5914 were intercepted.⁶

⁶I believe that the person that Torres was speaking to was **JUAN** Valdez in part because CS#2 bought heroin from **JUAN** Valdez over that telephone number and, during the monitored calls, Torres referred to

39. Based on call summaries and draft transcripts provided to me by the Boston DEA, I believe that Torres and **JUAN** Valdez also spoke about their respective drug trafficking operations. For example, on November 7, 2016, **JUAN** Valdez called Torres and asked if Torres could “come down today so I can give you that.” Torres responded, “I am going to get ready and head over there in about an hour and half.” Based on subsequent events, I believe the “that” which **JUAN** Valdez asked Torres to come down to get was drug money.

40. Several additional phone calls were intercepted between **JUAN** Valdez and Torres on that day as Torres was traveling to meet **JUAN** Valdez. While those calls were being intercepted by the DEA, SSTF members observed **JUAN** and **CLAUDIO** Valdez arrive at 500 Broad Street, Providence, RI (500 Broad St.) and enter the apartment building located there. At approximately 1:51 p.m., Torres was observed arriving at 500 Broad St., in a black Dodge Durango bearing MA license plate 4WS 518 (black Durango). He was the driver and only occupant of the vehicle. Torres was seen entering 500 Broad St. Approximately ten minutes later, Torres was observed leaving the apartment building. While walking back to the black Durango, surveillance officers noted that Torres was concealing a large item underneath the mid-section of his coat. Torres re-entered the driver’s seat of the black Durango and left the area.

the individual using that telephone number as “Carita” -- just as Gonzalez did when he was talking to **JUAN** Valdez.

41. The following day, on November 8, 2016, in conjunction with intercepted conversations, Torres was again placed under surveillance. Torres had been intercepted arranging to provide Danny Chee with "300 pesos." He was observed by law enforcement agents leaving a residence in possession of two large trash bags. Shortly after seeing Torres meet with Chee in North Reading, MA law enforcement officers conducted a traffic stop. The two trash bags, that Torres was previously seen carrying, were in Chee's car. The trash bags contained approximately \$300,854. Based on my knowledge of this case along with my training and experience, I believe that Torres drove to Providence pick-up drug money from **JUAN** and **CLAUDIO** Valdez. I believe that the drug money was a portion of the approximately \$300,000 ("300 pesos") seized in North Reading.

42. Within a week, **HECTOR** Valdez also called CS #1 and provided him with new phone number. Although **HECTOR** Valdez regularly changes phones, he had only been using his last phone for about seven days and this time he specifically instructed CS#1 not to call his previous telephone number anymore. I believe that the same arrests in Boston that **JUAN** Valdez referenced are what prompted **HECTOR** Valdez to switch phone numbers after so short a period of time.

43. After those arrests, the Valdez brothers stopped using 500 Broad Street as a daily meeting place. It was likely a former stash house. In addition to switching telephones and meeting places after the DEA arrests, **JUAN** Valdez also stopped using the white Taurus and began operating multiple vehicles, previously unknown to the investigation. Since approximately December 20, 2016, **JUAN** Valdez has been

observed by law enforcement officers operating a gray Toyota Highlander bearing MA license plate MA 3SL 817 (gray Highlander), the black Silverado, and at least four different rental cars. According to rental car records, the vehicles operated by **JUAN Valdez** have been rented by **CROTEAU** or by Melissa Perdomo and Hector Rojas.⁷

Controlled Buys

44. As thus far generally described, over the course of this investigation, both CS#1 and CS#2 have participated in numerous controlled drug buys from the Valdez brothers. In each case, CS#1 or CS#2 arranged the drug deal by contacting **HECTOR** or **JUAN Valdez** on different cellular telephones that they used over time. On each occasion, the contact was by text messages, phone calls, or both and a quantity of heroin was ordered. The calls made by CS#1 were recorded and the text messages were photographed. The calls and text messages made by CS#2 were made in my presence or that of another law enforcement officer and the conversations were listened to. Toll records verified all the contacts between the Cooperating Sources and **HECTOR** or **JUAN Valdez**. On each occasion, law enforcement investigators checked the Cooperating Sources for contraband prior to the transaction to be sure that they were

⁷Melissa Perdomo is (Jennifer) **PERDOMO**'s sister. Melissa Perdomo and **PERDOMO** have a third sister named Alexandra Perdomo. Alexandra Perdomo is believed to have children in common with **HECTOR Valdez**. Rojas and Melissa Perdomo were arrested in Queens, NY in 2014 when they attempted to pick-up approximately 3.3 kilograms of heroin destined for RI. Perdomo was found with \$12,700 at the time of her arrest. During her post-arrest interview, Perdomo said that she and **ROJAS** were sent from RI to Queens, NY by "Canita." She described Canita as her "sister's ex-husband's brother." I believe that Perdomo was referring to **HECTOR Valdez** as her "sister's ex-husband" because he has two children in common with Alexandra Perdomo and that she was referring to **JUAN Valdez** as "Canita" (**HECTOR**'s brother). Rojas admitted that "Canita" agreed to pay him and Melissa Perdomo \$500-\$700 for making the trip to NY. Canita is a pseudonym known to be used by **JUAN Valdez**.

not already in possession of any heroin or any additional cash. They never were. They were supplied with only enough official government funds for the purchase of the amount of heroin that had been ordered. In addition, CS#1 was equipped with an audio and video recorder for all controlled buys and payments in which he participated. The Cooperating Sources were followed to the transaction site and surveillance was maintained near the drug deal. Following the transaction, the Cooperating Sources were followed to a predetermined location where they turned over the heroin to me or another law enforcement officer working on this investigation. In each case, the Cooperating Sources were debriefed. Where applicable, the audio and video recording devices were retrieved and reviewed. Additionally, a field test was performed on the drugs that had been purchased. In each case, the field tests returned a positive indication for the presumptive presence of the drug that was purchased. Whenever I use the term "controlled buy" in this affidavit, that is the procedure that we followed.

45. After each controlled buy, the drugs were secured as evidence and submitted to either the RI State Department of Health Laboratory or DEA Northeast Lab for analysis. To date, all reports received from the state and DEA labs have confirmed that the substance purchased in every controlled buy has contained heroin, cocaine or fentanyl. In addition, forensic analysis has determined that the substance purchased during some the controlled buys contained Fentanyl and Heroin.

46. This chart summarizes the controlled buys and controlled payments completed by CS#1 and CS#2:

Date	CS:	Person / Phone Number Contact ed	Calls / Text Msg.	Amt Cocaine Recv'd (grams)	Amt Heroin Recv'd (grams)	Amt Fentanyl Recv'd (grams)	Amt Paid by CS:	Who arrived:	Delivery / Pick-up:	Vehicle used:
10/11/16	CS#2	Juan Valdez, (857) 218-0742	Monitored Calls		5		\$250	Claudio Valdez	Prairie Ave., Providence RI	Black Ranger
10/11/16	CS#1	Hector Valdez, (617) 901-7540	Recorded Calls		50		\$2,100	Hector Valdez	Pine St., vicinity of 500 Broad Providence RI	Black Ranger Black Porsche White Taurus - All in vicinity of area
10/14/16	CS#1	Hector Valdez, (617) 901-7540	Recorded Calls				\$900	Hector Valdez	Charlesgate Apartments, 670 N. Main Providence RI	Black Porsche
10/19/16	CS#1	Hector Valdez, (617) 991-0644	Recorded Calls		45		\$1,375	Hector Valdez	Pine St., vicinity of 500 Broad Providence, RI	Black Porsche Black Ranger
10/25/16	CS#1	Hector Valdez, (617) 991-0644	Recorded Calls				\$1,100	Hector Valdez & Emely Gonzalez	Charlesgate Apartments, 670 N. Main Providence, RI	Black Porsche
10/31/16	CS#1	Hector Valdez, (617) 991-0644	Recorded Calls		50		\$1,375	Hector Valdez	Pine St., vicinity of 500 Broad Providence, RI	Gray Infiniti Black Ranger
11/7/16	CS#1	Hector Valdez, (617) 991-0644	Recorded Calls & Text Messages				\$1,375	Tanya Croteau	Charlesgate Apartments, 670 N. Main Providence, RI	Silver BMW
11/14/16	CS#1	Hector Valdez, (617) 991-0644	Recorded Calls		60		\$1,375	Tanya Croteau	Charlesgate Apartments, 670 N. Main Providence, RI	Silver BMW

Date	CS:	Person / Phone Number Contact ed	Calls / Text Msg.	Amt Cocaine Recv'd (grams)	Amt Heroin Recv'd (grams)	Amt Fentanyl Recv'd (grams)	Amt Paid by CS:	Who arrived:	Delivery / Pick-up:	Vehicle used:
11/16/16	CS#2	Juan Valdez, (617) 818-5914	Monitored Calls		5		\$250	Juan Valdez	Prairie Ave., Providence, RI	White Taurus
12/6/16	CS#1	Hector Valdez, (617) 991-0644	Recorded Calls & Text Messages		100		\$1,375	Hector Valdez & Emely Gonzalez	8 Fenner St., Cranston, RI	Gray Infiniti
12/8/16	CS#2	Juan Valdez, (617) 818-5914	Monitored Calls		5		\$250	Juan Valdez	Prairie Ave., Providence, RI	White Taurus
12/12/16	CS#1	Hector Valdez, (413) 306-8598	Recorded Calls				\$1,500	Tanya Croteau	Armando's Meat Market, 895 Elmwood Ave., Providence, RI	Silver BMW
12/19/16	CS#1	Hector Valdez, (413) 306-8598	Recorded Calls				\$1,500	Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence, RI	Silver BMW
12/21/16	CS#2	Juan Valdez, TT-I	Monitored Calls		5		\$250	Claudio Valdez	Prairie Ave., Providence, RI	Black Ranger
01/02/17	CS#1	Hector Valdez, (774) 357-6805	Recorded Calls & Text Messages		20		\$1625	Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence,	Silver BMW
01/04/17	CS#2	Juan Valdez, TT-I	Monitored Calls		5		\$250	Claudio Valdez	Noyes Ave., Providence, RI	Black Ranger
01/09/17	CS#1	Hector Valdez, (774) 357-6805	Recorded Calls		90		\$1680	Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence, RI	Silver BMW

Date	CS:	Person / Phone Number Contact ed	Calls / Text Msg.	Amt Cocaine Recv'd (grams)	Amt Heroin Recv'd (grams)	Amt Fentanyl Recv'd (grams)	Amt Paid by CS:	Who arrived:	Delivery / Pick-up:	Vehicle used:
01/16/17	CS#1	Hector Valdez, TT-II	Recorded Calls				\$1520	Hector Valdez	Rain Car Wash, 140 Vandewater Providence, RI	Black Porsche
01/23/17	CS#1	Hector Valdez, TT-II	Recorded Calls & Text Messages		200		\$1300	Hector Valdez	Noyes Ave., Providence, RI	Black Porsche
01/30/17	CS#1	Hector Valdez, TT-II	Recorded Calls				\$2500	Hector Valdez	Armando's Meat Market, 895 Elmwood Providence, RI	Black Porsche
02/01/17	CS#2	Juan Valdez, TT-III	Monitored Calls		5		\$250	Juan Valdez	Prairie Ave., Providence, RI	Black Silverado
02/01/17	CS#1	Hector Valdez, TT-II	Recorded Calls	50			\$2000	Hector Valdez	Reservoir Ave. Repair & Alignment, 60 Reservoir Providence, RI	Gray Infiniti
02/06/17	CS#1	Hector Valdez, TT-II & (857) 773-9158	Recorded Calls				\$2000	Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence, RI	Silver BMW
02/13/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls				\$2500	Hector Valdez & Emely Gonzalez	Armando's Meat Market, 895 Elmwood Providence, RI	Gray Infiniti
02/14/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls			3		Hector Valdez	Ruggles St., Providence, RI	Gray Infiniti
02/21/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls			200	\$3000	Hector Valdez	Ruggles St., Providence, RI	Gray Infiniti

Date	CS:	Person / Phone Number Contact ed	Calls / Text Msg.	Amt Cocaine Recv'd (grams)	Amt Heroin Recv'd (grams)	Amt Fentanyl Recv'd (grams)	Amt Paid by CS:	Who arrived:	Delivery / Pick-up:	Vehicle used:
02/27/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls				\$2000	Hector Valdez	Ruggles St., Providence, RI	Gray Infiniti
03/06/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls				\$2000	Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence, RI	Silver BMW
03/13/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls				\$2000	Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence, RI	Silver BMW
03/20/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls	30g (base)			\$2000	Claudio Valdez & Tanya Croteau	Armando's Meat Market, 895 Elmwood Providence, RI	Silver BMW
03/28/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls			70	\$2000	Hector Valdez & Emely Gonzalez	Ruggles St., Providence, RI	Gray Infiniti
04/04/17	CS#1	Hector Valdez, (857) 773-9158	Recorded Calls	40			\$200	Tanya Croteau	IHOP, 45 Pleasant Valley Pkwy, Providence, RI	Silver BMW
Totals				120	645	273	\$43,800			

II. SUMMARY OF PROBABLE CAUSE ⁸

A. Arrest Warrants

HECTOR Bolivar Valdez-Nunez

47. **HECTOR** Valdez (DOB 06/02/1969), aka Arnaldo Lopez (DOB 12/15/1970), aka Jose Ocasio (DOB 05/26/1969), aka Jose Altagracia (DOB 04/03/1968), aka Jorge Figueroa (DOB 06/02/1969), aka Hector Nunez (DOB 06/02/1969), aka Jesus Perez (DOB 01/01/1966) aka Ramon Vegas (DOB 01/01/1966). He is the brother of **JUAN** Valdez and **CLAUDIO** Valdez and an organizer or leader of the VALDEZ DTO. **HECTOR** Valdez is a Dominican male who is present in the United States illegally. He is known to immigration officials as **HECTOR** Bolivar Valdez-Nunez (A045315485). He was deported from the United States on or about June 24, 2009 and has not received consent of the Attorney General of the United States to apply for readmission into this country. **HECTOR** Valdez has fraudulently obtained at least one RI driver's license and one MA driver's license in assumed names. He resides with **GONZALEZ** at 34 Burnside Avenue Apartment 3F, Woonsocket, RI. Based on the facts outlined in this affidavit, a search warrant is being requested for their apartment. **HECTOR** Valdez, his brothers, **CROTEAU**, and other accomplices have been observed regularly coming and going from 87 Dulude Ave., Apartment 1R, Woonsocket, RI.

⁸ In this section of the affidavit, I have attempted to organize the information, to the extent possible by the individual to be arrested, place to be searched or vehicle to be seized, however, there is a fair amount of spillover due to the nature of the conspiracy. Facts already presented in this affidavit or presented for one purpose may support probable cause for another and will not be repeated. Although presented under separate headings, the affidavit is meant to be read as a whole.

Based on the facts outlined in this affidavit, I believe that apartment at 87 Dulude, which was referred to as "the nest" or "the little hut" during intercepted conversations, serves as a stash house and a search warrant is being requested for that location. Electricity for that Apartment is billed in the name of Thomas Bonollo's company KTB Enterprises. Bonillo is a VALDEZ DTO heroin customer. He does not live in that apartment and none of the other tenants of that building has any ties to the VALDEZ DTO. **HECTOR** Valdez is a high-level cocaine and heroin distributor operating in the Providence metropolitan area. **HECTOR** Valdez has been intercepted on calls monitored pursuant to the Court's wiretap orders participating in hundreds of criminal and conspiratorial conversations with his brothers and other members of the VALDEZ DTO. **HECTOR** Valdez' criminal history includes the following arrests and convictions:

- January 4, 1989 – Arrested by the Boston Police Department for Trafficking a Class B Substance (disposition unknown);
- February 13, 1990 – Arrested by the Boston Police Department for Possession of Cocaine with Intent to Distribute (disposition unknown);
- May 21, 2001 – Arrested by the Rhode Island State Police (RISP) for Possession with Intent to Deliver (PWID) 1oz. – 1 kilogram of cocaine (5-year suspended sentence);
- February 1, 2007 – Arrested by the RISP for Possession of Schedule I-V (18-months of probation);
- December 10, 2008 – Arrested by the Providence Police Department (PPD) for Possession of Schedule I-V (36-month sentence, 6-months to serve);

- June 24, 2009 – Deported by Immigration and Customs Enforcement (ICE).

48. Since October 2016, CS#1 has participated in many drug deals with **HECTOR** Valdez as summarized in the chart of controlled buys. Those drug deliveries all involved the Black Ranger, Black Porsche, White Taurus, Gray Infiniti, and the Silver BMW which I am seeking to seize. These transactions were all video and/or audio recorded.

49. Examples of these types of transactions involving **HECTOR** Valdez abound and include:

- On January 16, 2017 CS #1 and **HECTOR** Valdez had multiple conversations on Target Telephone II to arrange the payment of a drug debt. During the conversations, **HECTOR** Valdez told CS#1 he intended to provide CS#1 with “200” when they met later that day. CS#1 told **HECTOR** Valdez that he preferred to pay off his current drug debt of \$1,520 this week and would take the “200” next Monday (January 23, 2017). **HECTOR** Valdez agreed to postpone the delivery of the “200.” Based on my training and experience as well as my knowledge of the facts of this investigation, I know that when the men used the term “200” they were discussing 200 grams of heroin.
- Later that same day, during a separate conversation (to arrange the payment of the drug debt) on Target Telephone II, **HECTOR** Valdez instructed CS #1 to meet him at a carwash behind the Dunkin Donuts on Branch Ave in Providence. He said that he would wait behind the carwash. CS #1 drove to that location where **HECTOR** Valdez was observed by surveillance agents waiting behind the Rain Car Wash on

Vandewater Street. He was standing next to the black Porsche. **HECTOR** Valdez entered the motor vehicle driven by CS #1 and collected \$1520 from him.

- On January 23, 2017 CS #1 and **HECTOR** Valdez had a conversation on Target Telephone II to arrange the purchase of the 200 grams of heroin. **HECTOR** Valdez told CS #1 to meet him near a Shell gas station on Union Avenue in Providence by taking a right on Webster Avenue where CS #1 would see him waiting. Due to some difficulty understanding the directions in the broken English spoken by **HECTOR** Valdez, CS #1 sent **HECTOR** Valdez a text messages that read, "right on Webster" to which **HECTOR** Valdez responded "yes." CS #1 found **HECTOR** Valdez in front of a wireless cellular phone store on Webster Avenue. **HECTOR** Valdez was observed by surveillance agents entering the motor vehicle driven by CS #1. He instructed CS #1 to drive to Inner City Auto, 540 Huntington Ave. Providence, Rhode Island. At Inner City Auto **HECTOR** Valdez was observed getting out of the car and meeting with **JUAN** Valdez. When **HECTOR** Valdez returned to the vehicle, in which CS #1 was waiting, he provided CS#1 with approximately 200 grams of heroin. In the course of conducting this investigation, I have determined that **JUAN** Valdez is primarily responsible for the acquisition of heroin for the VALDEZ DTO. I believe that **HECTOR** Valdez obtained the heroin that he supplied to CS#1 from **JUAN** Valdez just prior to the delivery.

50. **HECTOR** Valdez also coordinated with his brother **JUAN** to process drugs for distribution. On February 13, 2017, **JUAN** Valdez, using Target Telephone III, received an incoming call from (857) 773-91158 (a prepaid cell phone) and spoke to **HECTOR** Valdez. During this conversation, **HECTOR** Valdez said that "the guy" an

Unidentified Third Party (UTP) "didn't like it." **HECTOR** told his brother **JUAN** to bring him one of those things that look like "snow." **HECTOR** Valdez asked if he had the stuff to make it "white." **JUAN** Valdez responded "of course." **HECTOR** Valdez said that, "They are putting that thing on. Some of them use the meta." **HECTOR** Valdez said that he told the UTP that they do not do that because it is very dangerous so it comes "natural." **HECTOR** Valdez asked **JUAN** to bring him the "hard one" so that it is, "white, just like that." **HECTOR** Valdez asked **JUAN** if they add it to "los ojitos cerrados" (the closed eyes) if he thinks it will "come out hard." **HECTOR** Valdez said he was going to be around to get it from **JUAN** Valdez to give it to the UTP.

51. I believe that a UTP drug customer did not like the strength of the heroin he had received and asked for fentanyl. **HECTOR** Valdez told the UTP that he and **JUAN** Valdez do not have fentanyl because it is too dangerous. It was unclear if by "snow" or the "stuff to make it white" they were simply discussing ways to deceive the customer into believing that the heroin contained fentanyl or was fentanyl. However, they may have heroin that has it already mixed in. I have determined over the course of this investigation that "ojitos cerrados" and "China white" are terms used by the Valdez brothers to discuss heroin that may be mixed with fentanyl but they do not seem to sell fentanyl as a separate product.

52. Another example occurred on February 11, 2017, between **HECTOR** Valdez and **CLAUDIO** Valdez. Using Target Telephone II, **HECTOR** Valdez placed an outgoing call to **CLAUDIO** Valdez, on cellular telephone number (774) 357-6648. During the conversation, **CLAUDIO** Valdez told **HECTOR** that he was going to

"Cabezon's little hut ... I'm at the little hut." I recognized "Cabezon" (big head) as a nickname for **JUAN** Valdez. The "little hut" (sometimes referred to as "the nest") has been identified as 87 Dulude Ave. 1st floor, Woonsocket, RI. It is a stash house that the Valdez brothers use to store and process narcotics.

53. In the course of this investigation I overheard conversations concerning a drug that was being referred to as "Headache" and I was not familiar with that drug code. Sometimes the drug Headache was described as a pill or a blue pill, which led me to conclude that the Valdez DTO might have an opioid in pill form for sale most likely OxyContin or Percocet. To establish whether the VALDEZ DTO had Percocet for sale, on February 27, 2017, I instructed CS #1 to ask **HECTOR** Valdez if he had any Percocet available. **HECTOR** Valdez confirmed that he could provide them and asked CS#1 what he would be willing to pay. CS#1 responded between \$12 and \$16 per pill. **HECTOR** Valdez then told CS#1 that one has to be aware that there are many "fake" pills out there. The conversation ended with **HECTOR** telling CS#1 to let him know if he wanted any. I therefore concluded that **HECTOR** Valdez and the VALDEZ DTO are also distributing and/or conspiring to distribute Percocet but I have not had either CS attempt to purchase any.

54. Towards the end of this investigation, I came to understand that the VALDEZ DTO was also selling cocaine base (crack cocaine) and that **JUAN** Valdez primarily handled the heroin end of the business while **CLAUDIO** Valdez was more responsible for cocaine.

55. On Monday, March 13, 2017 CS#1, participated in a \$2,000 controlled payment (audio and video recorded) in part for 200 grams of "China White" heroin that **HECTOR** Valdez had previously provided to CS#1. CS#1 usually met **HECTOR** Valdez and/or **CROTEAU** every Monday at 12:00 p.m. while under law enforcement supervision in order to participate in a controlled transaction involving a drug purchase or payment. In the course of making this payment, CS#1 asked if **HECTOR** Valdez could provide him with 30 grams of crack cocaine. **HECTOR** Valdez told CS#1 that his "brother" had that and agreed to provide CS#1 with the crack cocaine on Monday, March 20, 2017. In the following series of calls, on March 20, 2017, I therefore understood "30 pesos" of "that" to mean the order for 30 grams of crack cocaine placed by CS#1.

- At approximately 8:47 a.m., **CLAUDIO** Valdez received an incoming phone call on Target Telephone IV from **HECTOR** Valdez who used telephone number (857) 773-9158. During the conversation, **HECTOR** Valdez told **CLAUDIO** Valdez to remember "that" for 12:00 p.m., which he also referred to as "the 30 pesos." **CLAUDIO** Valdez wanted to know if "he" was going to have "it" and **HECTOR** Valdez assured his brother "of course ... I don't give him that on credit ... that's with the money."
- At approximately 10:35 a.m., **CLAUDIO** Valdez received an incoming call from **HECTOR** Valdez. During the conversation, **CALUDIO** Valdez said he was going to have to go later because the "TV" in the car was broken. At the time of this conversation, **CLAUDIO** Valdez was operating the white Volvo.
- During other intercepted calls over Target Telephone IV, **CLAUDIO** Valdez arranged for **CROTEAU** to meet him to drop off the white Volvo at 65 Oriole Ave. in Pawtucket so that "Ricky" could fix the "TV" in the car. Shortly thereafter, surveillance officers observed **CROTEAU** arrive in her silver BMW wagon and meet **CLAUDIO** Valdez in Providence. **CROTEAU** followed

CLAUDIO Valdez to 65 Oriole Ave. where he left the white Volvo. **CROTEAU** and **CLAUDIO** Valdez then drove together back to 34 Burnside Ave. in the silver BMW.

- At approximately 11:04 a.m., CS#1 placed a recorded call to **HECTOR** Valdez. During the conversation, **HECTOR** Valdez asked to meet CS#1 at approximately 2:00 p.m.
- At approximately 1:54 p.m., CS#1 received an incoming call from **CROTEAU** which was also consensually recorded. **CROTEAU** asked CS#1 to meet her in about 25 minutes at Armando's Meat Market in Providence. About five minutes later, **CLAUDIO** Valdez and **CROTEAU** were observed leaving 34 Burnside Ave together and driving off in the silver BMW. **CLAUDIO** Valdez was driving the vehicle.
- At approximately 2:32 p.m., the silver BMW was observed by surveillance officers as it arrived at Armando's and parked next to CS#1. **CLAUDIO** Valdez was still driving of the silver BMW and **CROTEAU** was still the front seat passenger. After pulling up beside CS #1 **CROTEAU** signaled for him to follow them. CS#1 followed the silver BMW a short distance to Alger Avenue. **CLAUDIO** Valdez parked the silver BMW on the side of the road. CS#1 parked behind it. **CROTEAU** then left the silver BMW and provided CS#1 with approximately 30 grams of crack cocaine inside CS#1's vehicle. **CLAUDIO** Valdez remained in the driver's seat of the silver BMW during the transaction.

56. Based on my training, experience and understanding of the ongoing investigation, I believe that **CLAUDIO** Valdez is primarily responsible for the distribution of cocaine and crack cocaine within the VALDEZ DTO. Thus, when CS#1 requested 30 grams of crack cocaine from **HECTOR** Valdez, he said his "brother" had "that." That understanding was further reinforced when **HECTOR** Valdez called **CLAUDIO** Valdez to remind him to bring the "30 pesos" (30 grams of crack cocaine). I also understood the broken "TV" in the white Volvo to be a coded reference to a

mechanical hide used to conceal drugs during deliveries. A broken "TV" would not hamper a drug delivery. **CROTEAU** had to meet **CLAUDIO** Valdez because the hide in the white Volvo was broken.

*JUAN Valdez, Orlando ROBLES and
The Maestro*

57. **JUAN** Valdez (DOB 10/22/1966), aka Edwin Garcia (DOB 10/22/1966), aka Miguel Morillo (DOB 10/09/1967), aka Alan Medeiros (DOB 11/11/1966), aka "Canita," aka "Cabezon." He is the brother of **HECTOR** and **CLAUDIO** Valdez and an organizer or leader of the VALDEZ DTO. **JUAN** Valdez is a Dominican male who is currently in the United States illegally. He is known to immigration officials as **JUAN** Eduardo Valdez-Nunez (A072364341). He was deported from the United States on at least four occasions, most recently on or about January 20, 2011, and has not received consent of the Attorney General of the United States to apply for readmission into this country. **JUAN** Valdez has fraudulently obtained at least one RI driver's license in an assumed name. His current residence is at 24 Aberdeen Rd Apt. 2, Milton, MA where he lives with **RODRIGUEZ**. An application has been made to a judge in the District of Massachusetts to search that property. A search warrant was issued. Physical surveillance has established that he comes and goes from 103/105 Woodbine St., Cranston, RI on a daily basis. Based on the facts outlined in this affidavit, I believe that 103/105 Woodbine serves as a stash house and a search warrant is being requested for that location. Surveillance video from a Pole Camera captured images of **JUAN** Valdez coming and going from that location on a daily basis. He always used the entrance

located adjacent to the driveway on the south side of the two-family residence. **JUAN** Valdez is a high-level cocaine and heroin distributor operating in the Providence metropolitan area. **JUAN** Valdez has been intercepted on calls monitored pursuant to the Court's wiretap orders participating in hundreds of criminal and conspiratorial conversations with his brothers and other members of the VALDEZ DTO.⁹ **JUAN** Valdez' criminal history includes the following arrests and convictions:

- January 4, 1989 – Arrested by the Boston Police Department for Trafficking a Class B Substance (1-year sentence);
- May 27, 1991 – Arrested by the Woonsocket, RI Police Department for Assault with a Dangerous Weapon (No Contact Order and restitution);
- December 10, 1991 – Arrested by the Woonsocket, RI Police Department for Conspiracy to Violate the Controlled Substances Act (disposition unknown);
- September 10, 1992 – Arrested by the North Dartmouth, MA Sheriff's Department for Trafficking Cocaine (disposition unknown);
- December 15, 1994 – Arrested and deported by ICE;
- September 11, 1997 – Arrested and deported by ICE;
- July 21, 2000 – Arrested by the United States Marshals Service for PWID Cocaine and Possession of a Firearm by a Convicted Felon (57-month sentence);
- November 13, 2004 – Arrested and deported by ICE;

⁹ As earlier described in this affidavit, **JUAN** Valdez was also intercepted on a wiretap Order issued by the District of Massachusetts discussing drug trafficking operations involving kilogram weights of heroin.

- November 3, 2010 – Arrested by the Massachusetts State Police (MSP) for Operating a Motor Vehicle Without a License (disposition unknown);
- January 20, 2011 – Arrested and deported by ICE.

John Doe, alias Orlando ROBLES, alias Vladimir ARIAS, alias Franklin Arias

ROBLES or **ARIAS** (DOB: 4/17/85) was known as **ARIAS** throughout this investigation. As **ARIAS** (Approximately 35-40 years of age) he used the names Vladimir **ARIAS** and Franklin **ARIAS**, among others, and dates of birth in 1978 and 1983. He used those two variants of **ARIAS** on some DMV records and on an apartment rental form. However, in a recent traffic stop, **ARIAS** produced a MA driver's license that was issued on December 24, 2010 bearing his photograph, and the name Orlando **ROBLES** (DOB: 04/17/1985). I also found an arrest record under that name. I will refer to him by **ROBLES** but that is also likely to be an alias. I believe that it is likely that he is a Dominican male that fraudulently obtained his MA driver's license using the alias of a Puerto Rican born male named Orlando Robles. It is unknown if **ROBLES** is a U.S. citizen but he is probably not. Valdez is a drug runner and money courier for The Maestro (a Dominican drug source). In monitored conversations, after Maestro informed **JUAN** Valdez that his "compadre" would come for money or to deliver drugs, **ROBLES** would call to arrange a meeting and surveillance officers would observe the meeting with **JUAN** Valdez at which the transfers were made. **ROBLES** resides under the name **ARIAS** at 50 Warren St.

Apartment 306, Peabody, MA for which a search warrant was issued by the U.S. District Court in Massachusetts. **ROBLES** has the following criminal history:

- September 2012 – Possession with Intent to Distribute Class A Substance (Arrested by the New Bedford PD, Disposition Unknown)
- March 2015 – Violation of a Protective Custody Order (Arrested by the Lynnfield PD, Disposition Unknown)

58. Since October 2016, CS#2 has participated in six controlled drug buys with **JUAN** Valdez as summarized in the chart. On half the occasions, that CS#2 ordered heroin from **JUAN** Valdez, his brother **CLAUDIO** delivered it. Those drug deliveries involved the black Ranger, white Taurus and the black Silverado.

59. Examples of purchases involving both Valdez brothers include transactions occurring on December 21, 2016 and January 4, 2017. CS#2 telephonically arranged to buy heroin from **JUAN** Valdez over Target Telephone I (before wiretap monitoring began). In the conversations the men referred to the heroin only by weight. Based on my training and experience as well as my knowledge of the facts of this investigation, I know that when the men used the number “5” on the telephone they were discussing 5 grams of heroin.

- On December 21, 2016 CS #2 called **JUAN** Valdez and asked for “5.” **JUAN** Valdez said that his brother would bring it over but explained that his brother was out of town and it would take a while. A few hours later CS #2 called **JUAN** Valdez to inquire and was told that his brother was “four blocks away.” About 10 minutes later **CLAUDIO** Valdez was observed by surveillance agents arriving at the location that CS #2 was waiting and he provided CS #2 with 5 grams of heroin.

- On January 4, 2017, at approximately 10:00 AM, CS #2 called **JUAN** Valdez and asked for "5." **JUAN** Valdez acknowledged the order and said that his brother would call back. CS #2 then received an incoming call from **CLAUDIO** Valdez (using 774-357-6648). **CLAUDIO** Valdez delivered 5 grams of heroin to CS #2 shortly after the call.

60. From the onset of the wiretap investigation, it appeared that **JUAN** Valdez was primarily responsible for ordering and paying for the heroin distributed by the VALDEZ DTO. For example, on February 2, 2017, **JUAN** Valdez, using Target Telephone I made an outgoing call to the Dominican Republic and spoke to an unidentified male who was generally referred to as "Maestro" (Teacher). The Maestro, who was apparently in the Dominican Republic using (829) 321-6242, talked to **JUAN** Valdez about the quality of drugs available that were referred to as "the brown one," "China," "Ojitos" and the "Headache." For example, the Dominican supplier said his stuff was "original." He said that some people there (in the Dominican Republic) add the "powdery stuff" but he will not. They also dickered about the price per kilogram. For example, **JUAN** Valdez asked the supplier if he has the "brown one" and the supplier said he did at "60." Juan responded, "At that price I cannot grab it."

61. I know that "brown" was a common reference to heroin and that "China" was a common reference to Fentanyl. At that point in the investigation, I did not know what "Ojitos" (literally "little eyes") or the "Headache" meant. I later learned that "Headache" was a code name for Percocet and Ojitos was another code for heroin, likely containing fentanyl. The number "60" was shorthand for \$60,000 per kilogram for the "brown one" which was the approximate price of a kilogram of heroin. When

Maestro said that his stuff was “original” that was understood to mean that it was not cut or diluted with an adulterant “the powdery stuff.”

62. On February 10, 2017 **JUAN** Valdez, used Target Telephone III to place an outgoing call to The Maestro on cellular telephone number (829) 321-6242 (an area code assigned to the Dominican Republic). During the conversation, **JUAN** Valdez complained, “Maestro, I was going to get the other stuff but ... it doesn’t work. It’s good but it has to be more concentrated.” Maestro countered by saying that he had nothing left and people “loved it.” Maestro griped, “People want a Mercedes and want to pay the price of a Hyundai.”

63. I believe that when **JUAN** Valdez complained, “It wasn’t concentrated enough” he meant that the drugs had been cut and were not as potent as his customers wanted it. The Maestro quipped that his customers want quality at cheap prices.

64. During that same conversation, they also discussed debts. The Maestro told **JUAN** Valdez that, “when they do a second deal and they already know how things are he can ask for something in advance.” **JUAN** Valdez assured The Maestro that, “he pays when he says he is going to.” The Maestro recalled a situation in which he had to send “a friend” who was a “serious man” to collect \$80,000 but the debtor tried to make partial payments of “20 or \$30,000.” Maestro said that he was “not in a condition to owe money or have problems with someone else’s money.” Maestro recounted another incident in which he personally owed \$300,000 and had to pay with money that he had on hand and with a “property he had near the beach.” He said that, “his only problem is having Juan give him what they agreed on, nothing else.” **JUAN**

Valdez assured Maestro that on occasions in the past he has lost money to pay debts rather than make enemies of the people he owed. Maestro told **JUAN** Valdez that he was sending someone to him the following day. They agreed that **JUAN** Valdez would meet him at 11:30 A.M.

65. The next day, on February 11, 2017 at approximately 8:37 A.M., **JUAN** Valdez spoke on Target Telephone III with a male caller, later identified as **ROBLES** to arrange the 11:30 A.M. meeting. **ROBLES** was using cellular telephone number (781) 244-4738 (a prepaid cell phone with no subscriber). He agreed to meet **JUAN** Valdez, "At... at the same place where we met, right?" **JUAN** Valdez agreed, "Yes, let's do it at the same place, so we don't have to talk much you already know how things are around there."¹⁰ During the course of the morning, **JUAN** Valdez spoke with **ROBLES** several more times about the meeting. **ROBLES** was running late due to snowy conditions. Then, from just before noon until about 12:24 P.M., they spoke in an effort to locate each other. A surveillance team watched **JUAN** Valdez leave his stash house at 103/105 Woodbine Street at approximately 12:13 P.M. carrying a white plastic bag. He entered the black Silverado and drove to Sumter Street in Providence, where he parked adjacent to El Bombazo, located at 981 Broad Street. At approximately 12:25 P.M., **ROBLES** arrived in a white Nissan Altima (MA 5FB-P20) with a female, later identified as his wife Stephanie DelaCruz.¹¹ **ROBLES** was the driver of the vehicle. **ROBLES** entered

¹⁰ The Valdez brothers have regularly expressed concern about law enforcement surveillance and have accurately described surveillance vehicles and officers deployed in this investigation.

¹¹ The white Altima is registered to DelaCruz at 50 Warren St., Apt. 306, Peabody, MA.

the front passenger seat of the Silverado and, after about seven minutes, he left carrying the white plastic garbage bag that **JUAN** Valdez had brought to the meeting. **ROBLES** then departed the area in the white Altima with DelaCruz and was surveilled to Interstate 95 North.

66. A couple of hours later at approximately 3:06 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from The Maestro. Maestro confirmed, "He called me and said you gave him 60 pesos." In the context of this transaction, believe that "60 pesos" meant \$60,000 and that The Maestro called **JUAN** Valdez to acknowledge the payment.

67. On February 18, 2017, **JUAN** Valdez, using Target Telephone III, spoke to The Maestro on telephone number (809) 834-6057 (a cellular telephone with an area code assigned to the Dominican Republic). During the conversation, Maestro said that next week he was going to receive "things" and that they would be "stronger." **JUAN** Valdez responded by saying that, if they are stronger, "business" will be very good. Maestro anticipated that "10" were coming. He also told **JUAN** Valdez, "I need to have the money first when they come." The Maestro further explained that what was coming was the "regular one ... the dark one." **JUAN** Valdez told Maestro that people do not seem to like the one he has right now and that the dark one will move faster. Maestro asked **JUAN** Valdez if he would "take two or three?" **JUAN** Valdez observed that things were "slow" right now, so he only needed "two or three." He explained that he did not want too much to "pile-up." Later during the conversation, **JUAN** Valdez told Maestro that he was also very interested in the "Headache." Maestro said he

would speak to his friend about the "Headache" and let **JUAN** Valdez know. The pair agreed to speak again on Monday.

68. In this conversation, when Maestro said that "10 were coming" he was arranging for the shipment of 10 kilograms of heroin. These two men have had a number of conversations concerning heroin and other drugs. He specified that the heroin was going to be the "regular one" or the "dark one." "Brown" is a common reference to heroin in the drug trade to distinguish it from lighter color drugs like Fentanyl or cocaine and has been used by these men in this investigation. **JUAN** Valdez has complained about the quality and appearance of the heroin that was receiving in prior conversations. **JUAN** Valdez previously received "China White" which he was having trouble selling. Maestro told **JUAN** Valdez that this time, the heroin (the "dark one") would be "stronger," meaning of better quality but that he would need some amount of payment up-front. **JUAN** acknowledge that would be good for "business." He agreed to take two or three kilograms.

69. On February 20, 2017, **JUAN** Valdez received another incoming telephone call from The Maestro on Target Telephone III. The Maestro called from a different telephone number but with an area code that was also assigned to the Dominican Republic (829) 706-6033. During the conversation, **JUAN** Valdez expressed concern that he could not reach Maestro nor his courier **ROBLES** the previous day. Maestro responded, "No, no, no, it's because we switched the number." **JUAN** Valdez said, "I even called your compadre (**ROBLES**) ... and it was off." Maestro responded, "Yeah, he switched it too." Later in the conversation, Maestro said he was going to have "him"

(**ROBLES**) bring **JUAN** Valdez some "stuff for the headache" tomorrow between 12:00 p.m. and 2:00 p.m. so he can "check it." Maestro asked **JUAN** Valdez if he could "check that out with five" and **JUAN** said he needed more because he had "a lot of people for that, you understand me, so you can give them a couple so they check it with a couple of people, you understand me?" Maestro responded, "I'm going to send you ten or so." Towards the end of the conversation **JUAN** Valdez asked Maestro "Do I delete the other number?" Maestro responded "Yeah, you can delete it because this is the new one."

70. Maestro and his "compadre" **ROBLES** (the courier who is the common point of contact) each switched phone numbers. The Maestro planned to send **ROBLES** to deliver samples of "Headache" (Percocet pills) to **JUAN** Valdez so he could "check it" with his customers. The conversation about "5" which increased to "10" was a reference to some weight or number of samples of Headache needed to provide to **JUAN** Valdez's drug customers because he had "a lot of people for that."

71. On February 21, 2017 at approximately 11:45 a.m., **JUAN** Valdez received a phone call on Target Telephone III from Maestro's courier (**ROBLES**) who was using a new number, (781) 300-1459. During the conversation, **JUAN** Valdez said that he had been attempting to call him on the other phone. **ROBLES** told **JUAN** Valdez that the number he called him on was his new phone and that he no longer had the other one. **ROBLES** told **JUAN** Valdez that he would be there in about an hour and the pair agreed to meet at the "same place." **JUAN** Valdez asked **ROBLES**, "Are you bringing the headache, that he told me?" **ROBLES** confirmed, "Yes." **JUAN** Valdez then asked,

"And the other stuff, when is it coming? The one that is better." **ROBLES** advised that "it" would arrive in about a week. **ROBLES** also confirmed that **JUAN** Valdez, "needed the money for the stuff." He told **JUAN** Valdez he would call him when he was about 10 minutes away.

72. Based on this conversation and others I determined that **ROBLES** is a fully knowledgeable coconspirator. **ROBLES** was familiar with the negotiations between **JUAN** Valdez and The Maestro. He knew he was expected to bring samples of "Headache." He was aware that the shipment the "other stuff" or "the one that is better" was arriving in a week, and that The Maestro expected **JUAN** Valdez to pay up-front.

73. At approximately 1:03 p.m., **JUAN** Valdez received an incoming phone call on Target Telephone III from The Maestro, using telephone number (829) 706-6033. During the conversation, **JUAN** Valdez said, "I'm going to see your compadre soon ... he called me already." Maestro told **JUAN** Valdez, "You check the stuff well." **JUAN** Valdez responded, "If it's original, Maestro, then there is no problem." **JUAN** Valdez also asked about the "other thing" and Maestro said, "This week they will see me ... They are gonna come down, but what they are bringing is different. It's stronger ... it's stronger than what I gave you."

74. I believe that **JUAN** Valdez confirmed for The Maestro that he had made contact with his courier, **ROBLES**. As in prior conversations, **JUAN** Valdez and Maestro again discussed a pending shipment of heroin that is going to be of better

quality than the previous shipment that Maestro provided to **JUAN** Valdez. I again understood "original" to mean uncut or unadulterated.

75. At approximately 1:15 p.m., **JUAN** Valdez was observed leaving his stash house at 103/105 Woodbine Street. He was carrying a black bag that appeared to contain a square weighted object. **JUAN** Valdez entered the driver's seat of a white Nissan Altima (MA 3RV 856) and was followed by surveillance agents as he drove to Sumter St., where he parked and waited for the courier, **ROBLES**. At about 1:28 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from **ROBLES** who stated he would be there in one minute. Approximately one minute later, a gray Ford Explorer (MA 8GN 511) was observed arriving on Sumter St. and it parked directly behind **JUAN** Valdez who was still waiting in the Altima.¹² The Explorer was only occupied by the driver, **ROBLES**. **ROBLES** got out of the Explorer and entered the front passenger seat of the Altima. Approximately two minutes later, he left the Altima carrying the same black bag that **JUAN** Valdez was seen carrying out of 103/105 Woodbine Street. **JUAN** Valdez then drove away from the area. **ROBLES** drove away in the Explorer and was followed to Dorchester, MA at which time surveillance was discontinued to avoid detection and when it was clear that he was headed north towards Peabody.

¹² The gray Explorer is registered to Franklin Arias (DOB: 04/06/1990) at 103 Tracy Ave., Lynn, MA. Motor vehicle records show that the gray Explorer was previously registered to DelaCruz at that same address. In addition, 103 Tracy Ave. in the address listed on **ROBLES** current MA Driver's License.

76. Later that same day, at approximately 6:44 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from The Maestro, who was using telephone number (829) 706-6033. During the conversation, Maestro asked **JUAN** Valdez, "The things, did you see them, did you verify them?" **JUAN** responded, "Yes ... the ones I had before were a little lighter, these are darker." Maestro observed, "Yes, because they are never the same color ... they never come the same color ... check them." **JUAN** Valdez reiterated, "They are not the same ones as before. Those were like a light blue ... the ones I used the most were the lighter ones." Later in the conversation, **JUAN** Valdez asked, "And the guy, did he arrive? You compadre." Maestro acknowledged, "Yes, he arrived. I just talked to him ... everything is good."

77. I believe that The Maestro made this follow-up phone call to **JUAN** Valdez to see if he was satisfied with the quality of the "Headache" (Percocet) that his courier **ROBLES** had provided a few hours earlier on Sumter Street. **JUAN** Valdez observed that the Headache was a darker color than the light blue pills that he had distributed in the past. **JUAN** Valdez confirmed with Maestro that **ROBLES** acknowledged the payment of money. Maestro advised that he spoke to the courier and everything was "good."

78. On March 9, 2017, **JUAN** Valdez participated in numerous phone conversations over Target Telephone III with The Maestro on telephone number (829) 706-6033 and with Maestro's courier, **ROBLES**, on telephone number (781) 300-1459. The result of those conversations was to have **JUAN** Valdez deliver "30 pesos" to Maestro's courier, **ROBLES**. Based on my experience and knowledge gained in this

investigation, I know that, in the context of this conversation, 30 pesos meant \$30,000.

The delivery occurred on Sumter St. in Providence where other deliveries had occurred.

The first call from Maestro came in at approximately 12:24 p.m. Others followed:

- During the first conversation, Maestro and **JUAN** Valdez mutually observed that the drug business was slow. **JUAN** Valdez said he has never had a week where he has not sold "100 pesos" and that he had not yet sold all of Maestro's "stuff" (heroin). The Maestro also told **JUAN** Valdez that he needed to collect a couple "pesos" and asked **JUAN** Valdez if he could get him "30" ... lend him 30,000 pesos." **JUAN** Valdez responded, "no problem" and asked Maestro when he needed it. Maestro told **JUAN** Valdez "for today."
- At approximately 12:44 p.m., **JUAN** Valdez received a phone call from his courier, **ROBLES**. The two men agreed to meet "there" in about an hour and a half.
- At approximately 1:04 p.m., **JUAN** Valdez called Maestro. During the conversation, **JUAN** Valdez told Maestro that he spoke to the "boy" and that he was going to give him the "30 pesos." **JUAN** Valdez asked Maestro when Maestro was going to pay him back. Maestro responded, "next week."

79. **JUAN** Valdez was observed parking across the street from 103/105 Woodbine St. in Cranston, RI, at approximately 2:27 p.m. He got out of the driver's door of a white Nissan Altima (MA 3RV 856) and entered 103/105 Woodbine St. As **JUAN** Valdez was walking into the residence he was observed talking on his cellular phone. That call was made to **ROBLES**.

- During the conversation, **ROBLES** asked if they could meet a little later. **JUAN** Valdez asked **ROBLES** to come now. **JUAN** explained that he "just

came for it" and had "it" with him now. **ROBLES** agreed and said he would call when he was close.

- At approximately 4:09 p.m., **JUAN** Valdez called **ROBLES** and asked where he was. He said he was at Exit 1, referring to Exit 1 on Rte. 95 south in Attleboro, MA.

80. Approximately 10 minutes later, **JUAN** Valdez was observed leaving 103/105 Woodbine St. and entering the driver's seat of the white Altima. He was followed by surveillance officers to Sumter St., where he parked on the side of the road, just south of Broad St. at approximately 4:29 p.m.

81. Surveillance was maintained throughout the meeting that followed. At approximately 4:32 p.m., **ROBLES** arrived and parked directly across from the white Altima on Sumter St. **ROBLES** was the driver and only occupant of a gray Ford Explorer. **ROBLES** left the gray Explorer and entered the front passenger seat of the white Altima. Approximately one minute later, **ROBLES** left the white Altima carrying a small plastic bag that appeared to be wrapped around a square object. He returned to the gray Explorer while **JUAN** Valdez left in the white Altima. **ROBLES** was followed to Dorchester, MA. Physical surveillance was discontinued at approximately 9:54 p.m. GPS data showed that **ROBLES** continued to travel north until he arrived at the vicinity of his apartment on 50 Warren St. at approximately 10:30 p.m. with the \$30,000 that **JUAN** Valdez had given to him.¹³

¹³ After learning **ARIAS**'s new telephone number during the February 21, 2017 drug and cash exchange, I obtained a warrant to track **ARIAS**'s telephone.

82. On March 17, 2017, there were a number of calls concerning providing return of the \$30,000. From approximately 9:45 a.m. to 10:45 a.m. surveillance of the gray Explorer determined that it was parked in the parking lot of 50 Warren St., Peabody, MA. The GPS data showed it remained in the vicinity of the Peabody apartment until **ROBLES** left to meet **JUAN** Valdez.

- At approximately 12:03 p.m., **JUAN** Valdez received an incoming call on target Telephone III from the courier, **ROBLES**. During the conversation, **ROBLES** said he would be there in about an hour and ten minutes.
- About an hour and twenty minutes later, at 1:31 p.m., surveillance officers saw **JUAN** Valdez parking a gray Altima on Sumter St. near Broad St.
- At approximately 1:34 p.m., **JUAN** Valdez placed a call to **ROBLES** and said he was "parked there." **ROBLES** said he was one minute away.

83. At approximately 1:39 p.m., the gray Explorer parked on Sumter St., directly across from the gray Altima. **ROBLES** was the driver and only occupant. He left the Ford Explorer carrying a small black bag and entered the front passenger seat of the gray Altima. At approximately 1:53 p.m., **ROBLES** got out of the gray Altima empty handed. **JUAN** Valdez drove to his stash house at 103/105 Woodbine St. He entered the stash house carrying the black bag that the courier, **ROBLES**, was previously carrying.

84. Based on these conversations and surveillance, I believe that **ROBLES**, the courier, brought the \$30,000 that the Maestro owed to **JUAN** Valdez from his apartment in Peabody and returned it to **JUAN** Valdez.

85. At approximately 10:08 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from Maestro on telephone number (829) 706-6033. During the conversation, the men discussed their appreciation for each other's friendship. They also talked about Maestro's current life and the living conditions in the Dominican Republic. Maestro discussed the long-standing relationship he has had with his "Compadre" there (referring to the courier, **ROBLES**). Maestro said his Compadre has always been there for him and supported him. Maestro mentioned that he (**ROBLES**) was arrested in 2012. His attorney told him to plead guilty and accept five years in prison. However, he went to trial and won. Maestro further explained that **ROBLES** (his Compadre) does not trust people around Boston and stays in his house most of the time. Maestro said he trusts **ROBLES** to go to the "Apple" (New York City).

86. Based on this conversation, it appears that Maestro does in fact live in the Dominican Republic and that **ROBLES** is a Dominican Male that has been arrested in the United States. I believe that Maestro was referring to **ROBLES** September 2012 arrest in New Bedford, MA for possession with intent to distribute a controlled substance.

87. On March 28, 2017, at approximately 9:56 p.m., **JUAN** Valdez used Target Telephone V to call Maestro on telephone number (829) 2878-9486. During the conversation, Maestro said his courier (**ROBLES**) was going to the "Apple" tomorrow to bring some "tickets" because those people are "moving already." **JUAN** Valdez then asked, "Are they bringing the little brown house?" Maestro confirmed that they were, in addition to bringing some of "the stuff from above" (cocaine). After a discussion

about cocaine profits, **JUAN** Valdez changed topics and said, "If it comes strong, the other stuff that we spoke about, you are going to save me one and one of the little brown house. Nothing else. You get me? Because the guy that is going to bring me some stuff. Do you think that is going to be ready for tomorrow?" Maestro replied, "Not for tomorrow." Maestro predicted that it was likely this week. The pair agreed to speak later.

88. Based on this conversation, I believe Maestro explained to **JUAN** Valdez that **ROBLES** was bringing money (tickets) from Massachusetts to New York City (the Apple) on March 29, 2017 because the heroin (the little brown house) was in transit (moving already). I know that on March 29, 2017, a surveillance team saw **ROBLES** while he delivered money to an individual in New York City. I also believe that **JUAN** Valdez ordered one kilogram of heroin from Maestro (one brown house) and asked if **ROBLES** could provide it the next day. Maestro predicted it would be within week.

89. On April 4, 2017 at approximately 9:15 p.m., **JUAN** Valdez received a phone call on Target Telephone V from Maestro using telephone number (829) 287-9486. During the conversation, Maestro said his "friend" called him and that he has "that" in the "apple ... the little brown house." **JUAN** Valdez inquired, "At how much?" Maestro responded, "He's giving it to me at 54." The pair further discusses how some customers prefer the "little brown house" and other prefer the "ojitos cerrados." **JUAN** Valdez asked how much "it" was going to "hold" and Maestro said he did not know because it was from Ecuador and told **JUAN** Valdez he was going to have to "check" it. **JUAN** Valdez asked Maestro how much he was going to give it to

him (**JUAN** Valdez) for and Maestro said, "Let's leave it at the same, 56 so I can make a profit." During a follow-up conversation, Maestro told **JUAN** that he was going to check with "him" (**ROBLES**) to see when he could go and get "it."

90. Based on this conversation, I believe that Maestro told **JUAN** Valdez that his friend in New York City (the Apple) had received the heroin (the little brown house). I believe that the heroin was from Ecuador and the quality of the product was unknown. I believe that Maestro reported to **JUAN** Valdez that he bought the heroin for \$54,000 per kilogram and agreed to sell it to **JUAN** Valdez for \$56,000 per kilogram. I further believe that **ROBLES** was going to travel to New York City to pick up the heroin on behalf of Maestro.

91. On April 5, 2017 at approximately 11:54 a.m., **JUAN** Valdez received a phone call on Target Telephone V from Maestro using telephone number (829) 287-9486. During the conversation, Maestro said **ROBLES** had car problems and was going to head "over there" later that night. **JUAN** Valdez said he was not in a "rush" and would "grab it" when it arrives.

92. Later that evening, a Richmond, RI Police Officer coincidentally stopped **ROBLES** while operating the gray Explorer, at approximately 7:37 p.m. The traffic stop took place near Exit 3, off Interstate 95 South near the Connecticut border. **ROBLES** was the driver and only occupant of the vehicle. During the traffic stop, **ROBLES** provided his MA Driver's license (in the **ROBLES** identity) and told the officer he was driving to New Jersey.

93. Based on these calls and surveillance, I believe **ROBLES** was in route to New York City to pick up heroin on behalf of Maestro to deliver to **JUAN** Valdez.

94. On April 6, 2017 between approximately 11:58 a.m. and 12:07 p.m. **JUAN** Valdez using Target Telephone V and Maestro using telephone number (829) 287-9486 participated in two conversations. During the first conversation, Maestro said **ROBLES** would be there between two and three. During the second conversation, Maestro said **ROBLES** would be there about 1:30 p.m. **JUAN** Valdez also asked Maestro if Maestro could supply him with the "Ojitos Cerrados."

95. Later that day, between approximately 1:31 p.m. and 2:13 p.m., **JUAN** Valdez using Target Telephone V and **ROBLES** using telephone number (781) 300-1459 participated in three conversations. During the first conversation, **ROBLES** said he was 25 minutes out. **JUAN** Valdez acknowledged and said that Maestro had called and told him he (**ROBLES**) was coming. The pair agreed to meet at the "same place" (Sumter St.). During the second conversation, **ROBLES** said that due to the rain and traffic he was running late. During the third conversation, at approximately 2:13 p.m., **ROBLES** advised that he was turning onto the street. **JUAN** Valdez said he was in a different car than before and he was with his brother.

96. At approximately 2:15 p.m., **ROBLES** was observed by surveillance officers parking on Sumter St., directly across from **JUAN** and **CLAUDIO** Valdez, who were also parked and waiting in the silver BMW. Approximately two minutes later, **ROBLES** left the gray Explorer carrying a square object wrapped in a black plastic bag and entered the rear seat of the silver BMW. Approximately three minutes later,

ROBLES got out of the silver BMW empty handed and returned to the gray Explorer. The silver BMW and gray Explorer then departed the area.

97. A short time later, **JUAN** Valdez was observed arriving at 103/105 Woodbine St. in the silver BMW and carrying the item he received from **ROBLES** into the stash house. **ROBLES** was continuously kept under surveillance until he arrived back at 50 Warren St., Peabody, MA at approximately 6:10 p.m.

98. Based on these conversations and surveillance I believe that on April 6, 2017, **ROBLES** returned from New York City and provided **JUAN** Valdez with a kilogram of heroin while inside the silver BMW on Sumter St.

99. I have located Stephanie Delacruz's Facebook account and reviewed public photos that she has posted. I have compared those photos to surveillance photos taken of **ROBLES**. I believe that the individual she presents as her husband is **ROBLES**. Her current MA driver's license and her Nissan Altima registration lists her residence as 50 Warren St., Apt. 306, Peabody, MA. She is also the former registered owner of the gray Explorer.

100. On March 4, 2017, I obtained information from Crowninshield Property Management, the company that manages the apartment complex located at 50 Warren St., Peabody, MA. The management company advised that Stephanie Delacruz currently resides in apartment 306 and that she recently notified management that she was married and her husband now resides with her. The management company informed Delacruz that her husband had to submit a rental application. On March 30, 2017, the property management company advised that they had received an application

from DelaCruz's husband. The applicant listed his name as "Vladimir **ARIAS**" (DOB: 2/3/1983) and identified his wife as Stephanie DelaCruz. The social security number section was left blank, the prior address stated, "lived with family" and he declared that he was currently unemployed.

101. Based on all these intercepted communications coupled with surveillance I believe that **ROBLES** is an active drug runner and money courier for a major foreign drug source called The Maestro.

102. **JUAN** Valdez also serviced some of his own drug customers, the most regular of which were **MUNIR, DELGADO, LEONARDO, PELLOT, GUZMAN,** and **JOVAN** who are individually discussed in this affidavit and for whom arrest warrants are being sought. However, one of **JUAN** Valdez's largest drug customers (another mid-level drug dealer) he refers to as "Mello" has not been fully identified and his name surfaces in some reported conversations. An example of a couple of interceptions calls establish Mello's role.

- On February 17, 2017, **JUAN** Valdez, received an incoming call from 617-652-1044 (prepaid subscriber) on Target Telephone III and spoke to a male caller who identified himself as "Mello." During this conversation, Mello told **JUAN** Valdez that he was told that the "thing" was not good. **JUAN** Valdez said not to take "it" back and to ask the Unidentified Third Party (UTP) for the money. Mello explained that he was going to ask for "40 pesos" on credit but it is not worth it and that he is going to take "100 pesos." **JUAN** Valdez told him to take "100" because he will give him the "same one" that he gave him before. Mello asked **JUAN** Valdez if he had a "darker one." **JUAN** Valdez replied that he does not and insisted that the one he gave to Mello

was good. Mello retorted that sometimes his customers like variety. **JUAN** Valdez told Mello that he does not have "that one" because the one he has is good and is "working out everywhere." **JUAN** Valdez told Mello that when he goes he will bring him "that."

- On March 12, 2017 at approximately 2:33 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from Mello, who was using telephone number (617) 652-1044. During the conversation, Mello talked about an Unidentified Third party (UTP) that bought "150" pesos from him and that he has "25" left. Mello explained that he is "moving" the "other one" right now and waiting to "take out that one." Mello lamented that business was slow and that he has not yet made "1,000 pesos" this week. **JUAN** Valdez assured Mello that things will get better once people get used to "that one." Mello also mentioned that a second UTP called yesterday for "100." At the end of the conversation, the pair discussed life in the Dominican Republic and reflected, "We are not young anymore."

103. Based on my training and experience, as well as my familiarity with the interceptions in this wiretap investigation, I believe that, in these conversations, when the two men discussed the "thing," "it," "that one" or "that" they were discussing heroin. Mello claimed that one of his drug customers said that the heroin previously provided was not of good quality. **JUAN** Valdez instructed Mello not to take the heroin back but to collect the money that was owed for it. **JUAN** Valdez maintained that the heroin that he provided was found to be acceptable everywhere else. When Mello asked **JUAN** Valdez if he had "the darker one" that was also a reference to heroin, but of a different formulation. I believe that Mello and **JUAN** Valdez were discussing two

different types of heroin. Based on my investigation of the VALDEZ DTO, I know that **JUAN** Valdez received a shipment of "China White," which is lighter in color when compared to typical heroin, which is brown in color. **JUAN** Valdez was intercepted on numerous occasions discussing the difficulty of selling the lighter colored heroin because customers were leery of the lighter color, fearing that the drug is actually fentanyl and not heroin. **JUAN** Valdez assured Mello that, when customers get used to the different color, business would improve. The cryptic references to 25, 100 and 150 are indications of the weight of heroin in grams. "Peso" is a Spanish form of money and has been used interchangeably to reflect an amount in U.S. Currency or a weight of narcotics. I therefore also believe that Mello considers business to be slow in spite of having customers that purchase 100 and 150 grams of heroin at a time. Mello complained that he had not yet made \$1,000 in profits that week. Lastly, I believe Mello is a Dominican Male that is close in age to **JUAN** Valdez (approximately 50 years of age).

CLAUDIO Radhammes Valdez-Nunez and The Doctor

104. **CLAUDIO** Valdez (DOB 05/18/1972), aka Carlos Giovanetti Torres (DOB 08/05/1977), aka Luis Hernandez (DOB 10/14/1977). He is the brother of **HECTOR** and **JUAN** Valdez and an organizer or leader of the VALDEZ DTO. He is known to immigration officials as **CLAUDIO** Radhammes Valdez-Nunez (A045745985). **CLAUDIO** Valdez is a Dominican male who is currently in the United States illegally. He was deported from the United States on or about November 19, 2013 and has not

been received consent of the Attorney General of the United States to apply for readmission into this country. **CLAUDIO** Valdez has fraudulently obtained at least one RI driver's license and one MA driver's license in assumed names. **CLAUDIO** Valdez resides at 34 Burnside Ave., Apartment 3F, Woonsocket, RI. Based on the facts outlined in this affidavit, a search warrant is being contemporaneously requested for his residence. **CLAUDIO** Valdez has been intercepted on calls monitored pursuant to the Court's wiretap orders participating in hundreds of criminal and conspiratorial conversations. **CLAUDIO** Valdez' criminal history includes the following arrests and convictions:

- May 10, 2000 – Arrested by the New York State Police (NYSP) for Possession of a Controlled Substance – 4oz. and Resisting Arrest (convicted, sentence unknown);
- January 15, 2009 – Arrested by the Franklin, MA Police Department for PWID Class B Substance (disposition unknown);
- November 19, 2013 – Arrested and deported by ICE.

105. Since October of 2016, **CLAUDIO** Valdez personally delivered small amounts of heroin totaling 15 grams to CS#1 on three occasions in exchange for \$750. In March of 2017 he was involved in the delivery of 30 grams of crack cocaine to CS#2 for \$2000. These drug deliveries involved the black Ranger and the Silver BMW.

106. During the wiretapping, **CLAUDIO** and **JUAN** Valdez were intercepted numerous times discussing debts, large and small, that were part of the business of running the VALDEZ DTO. For example, on March 6, 2017 at approximately 7:45 p.m.,

CLAUDIO Valdez placed a call on Target Telephone IV to **JUAN** Valdez on Target Telephone III. During the conversation, **CLAUDIO** Valdez said he had been doing "calculations" and that **JUAN** owed him "400 pesos." **CLAUDIO** Valdez explained that he had given **JUAN**, "Five pesos ... 3,900 for **JUAN**'s wife (**RODRIGUEZ**) and 700 for "Bori" (slang for a Puerto Rican male) which he calculated to mean a 400 peso overpayment. **JUAN** Valdez countered that he thought they were "even" and that his wife's bill was only 2,900. The pair continued to argue about money. **CLAUDIO** Valdez asked **JUAN** Valdez to write down "5,000 minus 3,900" (for **JUAN**'s wife) minus "700 for Bori's two balls." **CLAUDIO** Valdez added that he gave "Tanya" (**CROTEAU**) "150" and their dad (Ronald Tetreault) "425." **JUAN** Valdez disagreed with his brother's accounting. He added that he gave **CLAUDIO** Valdez the money from "Carlitos" (**DELGADO**). The pair agreed to determine the numbers in person.

107. In this conversation, the Valdez brothers were trying to balance their drug ledgers. I believe that **CLAUDIO** Valdez told **JUAN** Valdez that **JUAN** owed him a balance of \$400 because he had provided \$5,000 worth of narcotics (five pesos) to **JUAN** and was only repaid \$4,600. I further believe that by "Juan's wife" they were referring to **RODRIGUEZ** and that she had been provided with \$3,900 worth of narcotics. Another \$700 worth of narcotics was provided to a customer, whom they referred to as "the Puerto Rican." I know "Carlitos" to be a name used for **DELGADO**.

108. Another occurred on March 9, 2017 at approximately 1:21 p.m., **CLAUDIO** Valdez received an incoming call on Target Telephone IV from **JUAN** Valdez on Target Telephone III. During the conversation, the pair discussed people that

owe them money. **JUAN** Valdez directed **CLAUDIO** to write down "200" for Mello because he (**JUAN** Valdez) had given Mello "200 pesos." **JUAN** Valdez warned **CLAUDIO** that he needed to pay attention to "details" because this was not a good time to be giving "it" on credit when "things" are slow. **JUAN** Valdez complained that business used to be more profitable and that if things continue like this he may "retire." The pair discussed how "morena" (dark-skinned woman) owed 1,000 pesos and how other people that owe "disappeared."

109. I interpreted this conversation to concern drug debts. Specifically, in this instance, **JUAN** Valdez complained about a payment owed for 200 grams of heroin supplied to Mello that was outstanding. **JUAN** Valdez warned **CLAUDIO** against providing drugs to customers on credit, because business was slow and some customers have disappeared without paying for the drugs, including a woman who owed them \$1,000 ("1,000 pesos").

110. More significantly, **CLAUDIO** Valdez was the point of contact with a new drug source. Although the principle source of supply during the period of monitoring appeared to be The Maestro, there were others. **JUAN** Valdez generally communicated with The Maestro. **CLAUDIO** communicated with other suppliers referred to as "The Doctor" and "The Mexican." Whereas, **JUAN**'s wire communications with The Maestro were monitored, **CLAUDIO** seemed to communicate with The Doctor on a telephone that was only used to speak to The Doctor and was not being monitored. What is known about **CLAUDIO** Valdez and The Doctor was learned during conspiratorial conversations between the brothers on monitored phone lines.

111. For example, at approximately 7:21 p.m., on February 18, 2017, **CLAUDIO** Valdez used Target Telephone IV to call **JUAN** Valdez on Target Telephone III. They discussed a source of supply that they referred to as El Doctor (The Doctor). **CLAUDIO** Valdez informed his brother **JUAN** that The Doctor had been "released." **JUAN** Valdez asked **CLAUDIO** for The Doctor's number but **CLAUDIO** cautioned him that it will be better to call from a "clean number." They discussed problems on prior drug deals with The Doctor and **JUAN** instructed **CLAUDIO** what to say when he spoke to him:

JUAN: But listen to me. When you talk to The Doctor, you tell him, 'We had a lot of issues with that.' Because, for real, we had a lot of issues. Do you understand?

CLAUDIO: No, I know but ... [Voices Overlap]

JUAN: You tell him. 'Doctor, if you have been out, we would have returned that to you. We had a lot of issues and losses with that thing.'

CLAUDIO: Yeah, don't worry that we'll talk about that really good. What I will tell him later, you will just confirm it to him as well.

112. The conversation continued concerning **JUAN**'s belief that whatever was done to them was a "rip-off" and that he felt betrayed. In response, **CLAUDIO** agreed to speak to The Doctor:

CLAUDIO: I will talk to him ... I don't know if tonight I will ... Because I want to see if we take out a new thing just to do that. For us not to be with that here. You know.

JUAN: Well.

CLAUDIO: Today, I will finish talking to him and I will tell him, 'Tomorrow I will send you a number' to his brother for him to send it to him. That one will be just to talk to him and that's it.

JUAN: Exactly! To negotiate something, because how the prices are now ... And I don't know how that will be.

113. Based upon my training and experience as well as the knowledge I have gained during the course of this investigation, in context, I believe that The Doctor is a drug source of supply with whom the Valdez brothers have done business in the past. When **JUAN** Valdez instructed his brother, to tell The Doctor that they "had a lot of issues with that" he was reminding him to complain that the last shipment of drugs that they received from The Doctor was not of good quality and they lost money on the deal. I believe by "released" **CLAUDIO** Valdez was saying that The Doctor had been recently released from prison because **JUAN** said that he would have returned the bad batch of drugs if The Doctor would have "been out." Despite that history, it appeared that the Valdez brothers intended to reestablish contact with The Doctor, through **CLAUDIO** Valdez, and continue doing business with him.

114. On February 18, 2017, at approximately 8:20 p.m., **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez on Target Telephone IV. After discussing the quality of drugs that they referred to as the "white stuff" and the "brown stuff," the conversation turned back to The Doctor and another individual referred to as

"Sombrerudo" (The Mexican).¹⁴ JUAN Valdez asked his brother if he had spoken to The Doctor yet:

CLAUDIO: The brother spoke to him. It was The Mexican that wanted to talk to me, because what's his name sent him a message because tomorrow morning he was going to talk to the brother over there. Tomorrow I will talk to The Doctor.

JUAN: Which Mexican? The one that The Doctor got out? He came out too?

CLAUDIO: No, all of them are out but what happens with The Mexican is that ... you talked with the one that I always talk to, the other one. The Doctor's brother told me that he was on his way to pick him up since he got released. I asked The Doctor's brother, 'Did you talk to The Doctor?' He told me, 'No, no, no, tomorrow he told me that he was going to talk to me.' He said that, 'The Mexican had told him.' But the whole group was released.

JUAN: That's good.

CLAUDIO: So, The Mexican wanted to talk to me. The one that we always talk to.

JUAN: Which one is that? Because you are the one that talks to them, not me. I don't talk to neither one.

CLAUDIO: You talked to him once. He's The Doctor's friend. The one that is always out, running errands.

JUAN: Oh, the one who runs the errands?

CLAUDIO: Yes, you spoke to him once. That's why I said, the one we talk to. So he was the one who was on his way to go look for The Doctor, but he was assured that he was released.

¹⁴ I know that the "white stuff" and the "brown stuff" are commonly used in the drug trade to distinguish between cocaine and heroin.

JUAN: Things are good then.

CLAUDIO: I was thinking that tomorrow ... damn! Everything is going to be closed tomorrow. I was going to get ... a new exclusive one just to talk to him. I will add a card and all the things.

JUAN: Yes.

CLAUDIO: I'm going to do that, so I'm not all tangled up with this and that, you know? It's better like that. Tomorrow or later on I know I will get in touch with him. But he is going to call me; I'm going to call The Doctor's brother now because he wanted to talk to me right away.

JUAN: Okay.

CLAUDIO: Yes, I'm going to call The Doctor's brother again.

The conversation then turned to other drug matters including "stuff" coming from a supplier they called "Odali" in this conversation.¹⁵

JUAN: No, because we have to check that to be sure. I took that to help him, but damn! That stuff is not good. I'm not going to screw myself. I'm going to give that back. I don't want any more problems than the ones I have.

CLAUDIO: Okay, tomorrow I'm going to do some rounds. Cabellu gives a good verdict for Odali's stuff.

JUAN: Odali's is strong and I told him that it had to come stronger, so he said that it's coming stronger now. Imagine that, if it's stronger.

¹⁵ Odali is believed to be The Maestro, **JUAN** Valdez's source of heroin in the Dominican Republic. In monitored telephone calls on Target Telephone III, **JUAN** Valdez called his source "Maestro" but in conversations with **CLAUDIO** Valdez he appeared to refer to the same source as "Odali."

The brothers also discussed paying a woman named "Ivana" \$150 to use her house to conduct a drug transaction and then discussed the treachery of the drug trade:

JUAN: Yes, the guy is good. I like the way he thinks. He told me, 'Look for a house and then he will go there and will do it in front of you, because I don't want to trust my buddy 100% because you know how people are, that they betray you and then they give you something that is not and then I will be fucked.'

CLAUDIO: No, he is looking to be sure. What I will do is that I will call Ivana now and I will tell her that tomorrow I'm going to stop by.

JUAN: No, but that is not for now. He will come on Monday. I will give him the papers. And he will come back on Tuesday or Wednesday. The guy they killed, Bobo [ph] he had some stuff taken that he had given to on credit.

CLAUDIO: Now everybody is tricky.

JUAN: No, he used to pay what happened is that he got killed.

CLAUDIO: Oh

JUAN: Bobo.

CLAUDIO: Oh was it because of that that he got sent to the other side?

JUAN: No, no. He gave something on credit to him and he used to pay. No one knows what happened to him. Enrique's son said that he would always give him stuff and he would pay.

CLAUDIO I heard that story. But I heard that that guy owed everybody.

115. In this conversation when the brothers discussed the strength of the "stuff" they were discussing the potency of narcotics. "Papers" generally mean money used to pay for drugs and their suspicion was that a person called "Bobo" was killed

("sent to the other side") for failure to pay his drug debts. This conversation reconfirmed for me that **CLAUDIO** Valdez is the point of contact with a source of supply called The Doctor who is a part of a larger group. The descriptive phrase "all of them" suggested a cohesive group. The group seems to be led by The Doctor and includes The Mexican, or possibly two individuals referred to by that moniker, and others. They had all been recently released from prison, "the whole group was released." All of which suggested to me that **CLAUDIO** Valdez is dealing with a Drug Trafficking Organization as a source of supply rather than an individual drug trafficker.

116. On March 7, 2017, at approximately 5:00 p.m., **CLAUDIO** Valdez used Target Telephone IV to place a call to **JUAN** Valdez on Target Telephone III. During the conversation, **CLAUDIO** Valdez told **JUAN** that, "The Doctor wants 10 pesos to be sent." **JUAN** Valdez responded, "You have 12 there. Send him the 10." **CLAUDIO** Valdez also told **JUAN** that The Doctor said that one can come as the "Ojitos Cerrados ... it will be a little bit ... it could be at first like three or four pesos ... three or four at first." **JUAN** Valdez questioned, "But four, right? Four?" **CLAUDIO** Valdez answered, "Yes, three or four pesos, it could be that few, do you understand me?" **JUAN** Valdez inquired, "400 or 4?" **CLAUDIO** Valdez clarified, "No. No, the mesita (little table)." **JUAN** Valdez then cautioned his brother, "It has to be really good. Do you understand me? You have to tell him about the 10 pesos that are going to be sent ... discount from there what is going to be sent."

117. I understood that **CLAUDIO** Valdez told **JUAN** Valdez that The Doctor needed a \$10,000 payment. **JUAN** Valdez told his brother to make the payment out of

\$12,000 that he had on hand. This conversation related to a heroin (ojitos cerrados) shipment coming from The Doctor. **CLAUDIO** Valdez estimated that the first shipment would be three or four kilograms, which he referred to as "3 or 4 pesos." In this case, the meaning of "peso" depends on context. It has been used as a code for money and for weight. When **JUAN** asked "400 or 4" he was seeking clarification as to whether **CLAUDIO** meant 400 grams or 4 kilograms. **CLAUDIO** explained, "the mesita" which means "little table." Mesita is a code for a kilogram because the typical shape of a kilogram of narcotics is a compact rectangle, similar in appearance to a little table. **CLAUDIO** Valdez apparently considered three or four kilograms to be a small amount of heroin.

118. Three related conspiratorial conversations between **CLAUDIO** and **JUAN** Valdez on Target Telephones III and IV occurred between March 9th and March 11th:

- On March 9, 2017 at approximately 1:38 p.m., **CLAUDIO** Valdez received a call from **JUAN**. During the conversation, **JUAN** Valdez told **CLAUDIO** that "this thing is not good" and that if "it" is not "100" he will return it. **JUAN** Valdez warned **CLAUDIO** Valdez not to trust "pictures" and that if it is not "original" they will not "move" it.
- On March 10, 2017 at approximately 9:02 p.m., they spoke again. During the conversation, **CLAUDIO** Valdez said he spoke to the "Sombbrero" (The Mexican). He reported that The Mexican contacted an Unidentified Third Party (UTP) "over there." **CLAUDIO** Valdez further reported that he told the Mexican to send the UTP "over here" but the Mexican wanted to know if **JUAN** or **CLAUDIO** Valdez could send someone "there." **JUAN** Valdez expressed concern about making a trip "there." **CLAUDIO** Valdez suggested

that they send someone they trust to go get "it." He suggested "Melissa" (Perdomo) and that they could pay her "200 pesos." **JUAN** Valdez expressed his opinion that "Melissa" would not make the trip for "200 pesos."

CLAUDIO Valdez said he would address the Doctor about sending someone "up here."

- On March 11, 2017 at approximately 4:18 p.m., **CLAUDIO** Valdez called **JUAN** Valdez. During the conversation, **CLAUDIO** Valdez said he spoke to the Doctor and that the Doctor said it is "ojitos cerrados." **JUAN** Valdez disagreed, instructing **CLAUDIO** to tell him (the Doctor) that it is not and that it is "shit." **JUAN** Valdez warned that he will be "checking it." **JUAN** Valdez protested that he did not want to be wasting his time.

119. I understood these three conversations to relate a shipment of heroin for the Valdez DTO from The Doctor or The Mexican that was supposed to be of the ojitos cerrados type or quality. **JUAN** Valdez warned **CLAUDIO** about the importance of ensuring that the heroin was of high quality and that he should not trust the samples (pictures) that he was sent. Only "original" (uncut) was acceptable. **JUAN** Valdez felt that the shipment that they had received was not good (shit). The discussion also involved how they were going to get the heroin from "there" (likely NY) to "here." **CLAUDIO** Valdez suggested paying Melissa Perdomo \$200 for picking up the narcotics on their behalf. **JUAN** did not believe that she would be willing to do it for that price.¹⁶

120. On March 25, 2017, at approximately 6:00 p.m., **CLAUDIO** Valdez received an incoming call on Target Telephone IV from **JUAN** Valdez on Target

¹⁶ In 2014, Melissa Perdomo (Jenifer **PERDOMO**'s sister) was arrested in Queens, N.Y. when she attempted to pick-up approximately 3.3 kilograms of heroin from a Mexican source of supply on behalf of the Valdez brothers.

Telephone III. During the conversation, **JUAN** Valdez asked **CLAUDIO** if he had sent The Doctor "10." **CLAUDIO** Valdez twice confirmed that he had. **JUAN** Valdez then said, "I owe him 100 pesos and I lent him 10 on the side." **JUAN** Valdez asked that **CLAUDIO** Valdez keep track of the numbers and write everything down so The Doctor does not start "trouble." **JUAN** Valdez said that he wanted the Doctor to come get the rest of the money because he does not want "problems." **CLAUDIO** Valdez confirmed again, "twice he has been wired ... 10 pesos and 10 pesos." **JUAN** asked **CLAUDIO** Valdez to call the Doctor and tell him, "They have given 20 to you. They owe you 100."

121. Based on this conversation, I believe that **JUAN** and **CLAUDIO** Valdez have wired The Doctor \$20,000 towards a drug debt they owe him. There have been other intercepted conversations in which **PERDOMO** cautioned **JUAN** Valdez against wiring more than \$10,000 at a time because that amount causes financial institutions to file currency transaction reports (CTR's) with law enforcement. Therefore, when **JUAN** said that he wanted The Doctor to come get the money to avoid "problems" -- that is the problem that he was trying to avoid. I believe that they still owe the Doctor \$100,000 (100 Pesos) and that **JUAN** Valdez wanted the Doctor to come collect the remainder of the money in person.

122. On March 31, 2017 at approximately 9:52 a.m., **JUAN** Valdez received an incoming call on Target Telephone V from **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **CLAUDIO** Valdez said he was just "talking to the Doctor ... supposedly someone is coming to pick up the money." **CLAUDIO** Valdez said they also spoke about the "ojitos cerrados" and getting "about five." **JUAN** Valdez

adamantly refused and said that he had to do the "shit" first. **CLAUDIO** Valdez said that the "Doctor" first quoted him "55" but then said "53." **JUAN** Valdez stressed that he would not "grab it" at "50" observing that he can get it cheaper "over here." **JUAN** Valdez said he is going to tell The Doctor not to bring five because he does not trust them and that that he only wants one to "check it." **CLAUDIO** Valdez tried to convince **JUAN** to do business with The Doctor and said that The Doctor promised to return the "stuff" if it is not good. However, **CLAUDIO** agreed that they should sample the "stuff" first. **JUAN** warned **CLAUDIO** Valdez that even if the "stuff" is good, "things are moving slowly" right now, suggesting that they should not be stockpiling too much product.

123. Based on this conversation, I believe that The Doctor, who is one of the Valdez brothers Mexican drug sources, plans to send a courier to get the \$100,000 that **JUAN** and **CLAUDIO** Valdez owe for drugs they previously received from The Doctor. I believe that The Doctor has drugs for sale, likely heroin containing fentanyl (ojitos cerrados), that are currently in shipment to the United States. **CLAUDIO** Valdez suggested that they purchase five kilograms of the ojitos cerrados. **CLAUDIO** Valdez negotiated a price of \$53,000 per kilogram. **JUAN** Valdez, who was not satisfied with a previous shipment, thought that price was too high. He countered that he would not even be willing to pay \$50,000 for a kilo of ojitos cerrados from The Doctor. **JUAN** Valdez was only willing to purchase one kilogram in order to check the quality of the product. I also believe **JUAN** Valdez does not want to purchase too much heroin because the demand has been slow and he does not want to have too much on hand.

Having a large stockpile would leave him more vulnerable to theft by criminals or seizure by law enforcement.

124. In the afternoon of March 31, 2017, at approximately 3:00 p.m., **JUAN** Valdez called **CLAUDIO** Valdez and they had a follow-up conversation. **CLAUDIO** Valdez said "The Doctor's friend" called him to "collect the 100 pesos" and that he wants to come on Monday. **JUAN** Valdez replied that they needed to find a place to do the transaction. **JUAN** Valdez said they should do it at the place **CLAUDIO** Valdez previously suggested and that he was going to get a key for that place. **CLAUDIO** Valdez said he would give "the woman" "something" for letting them use her place. **CLAUDIO** Valdez said he would call her later today to get a copy of the key. **JUAN** Valdez expressed his frustration with The Doctor and the poor prices that The Doctor is giving them.

125. About a half hour later, at approximately 3:35 p.m., **JUAN** Valdez received a phone call from **RODRIGUEZ**. **JUAN** Valdez told **RODRIGUEZ** he would talk to her later because he was on his other phone with The Doctor.

126. Based on these conversations, I believe that The Doctor planned to send a money courier to get \$100,000 from **JUAN** and **CLAUDIO** Valdez on Monday, April 3, 2017. It also appeared, based on the familiar use of the nickname in conversation, that **RODRIGUEZ** was aware of The Doctor and his role in the VALDEZ DTO. Based on other intercepted calls, I know that **CLAUDIO** Valdez suggested they do the transaction at Judy Hernandez's (the woman's) apartment, which is located at 14 Vinton St., Providence, RI, and that he had received a key to that apartment for that purpose.

Jennifer PERDOMO

127. **PERDOMO** (DOB: 01/05/1976) lives at 88 Barrows St., Providence, RI. **PERDOMO** has actively assisted the VALDEZ DTO distribute drugs. In monitored conversations, she has been overheard collecting drug debts and transporting drugs for **CLAUDIO** Valdez. **PERDOMO** has rented vehicles in her own name for use in drug trafficking. She has acted as a lookout for both **JUAN** and **CLAUDIO** Valdez; accurately identifying surveillance officers in their undercover vehicles. She has had an unidentified source run the license plates of suspected police surveillance vehicles and has gathered information on bank reporting requirements for the Valdez brothers. **PERDOMO** is (or was) **CLAUDIO** Valdez's girlfriend. At the beginning of the investigation, they lived together. Then **CLAUDIO** began staying at the apartment building in which his brother **HECTOR** Valdez and **CROTEAU** live (34 Burnside) but recently he went back to **PERDOMO** (at 88 Barrows). Whatever the current relationship between **CLAUDIO** Valdez and **PERDOMO** she continues to actively assist the VALDEZ DTO.

128. On March 7, 2017, **CLAUDIO** Valdez used Target Telephone IV to place several phone calls to **PERDOMO** concerning the collection of a drug debt and bank reporting requirements.

- At approximately 12:53 p.m. he called and asked her if she had seen "Nicky" yet, because Nicky was supposed to give her the money. **PERDOMO** said she had gone to Nicky's but Nicky was not there. **CLAUDIO** Valdez explained that "Renato" said Nicky was going to provide **PERDOMO** with

the money. **CLAUDIO** Valdez directed **PERDOMO** to call Renato on “the other little phone” and “tell him to give her the 430.”

- At approximately 1:07 p.m., **CLAUDIO** Valdez received an incoming phone call from **PERDOMO**. During the conversation, **PERDOMO** told **CLAUDIO** Valdez that Renato “only gave me 400.”
- At approximately 4:01 p.m., **CLAUDIO** Valdez called **PERDOMO**. During the conversation, the pair discussed bank-reporting requirements for depositing and/or withdrawing \$10,000 or more. **PERDOMO** said she knows people at Bank of America who have told her about the process. **PERDOMO** said if it is more than \$10,000, “there is a process ... people get investigated.” **CLAUDIO** Valdez said he is going to have to talk to The Doctor about it.

129. When **CLAUDIO** Valdez instructed **PERDOMO** to get \$430 from “Renato” he was telling her to collect a drug debt. Other interceptions established that Renato was a drug customer who communicates with **CLAUDIO** Valdez on telephone number (401) 472-4956. Telephone number (401) 472-4956 is subscribed to in the name “Nicole Cruze” who I believe to be the “Nicky” referred to in the conversation. **PERDOMO** likely has another phone on which she communicates with drug customers (“the other little phone”). **CLAUDIO** Valdez was apparently considering wiring or depositing money into an account in order to pay The Doctor. **JUAN** Valdez instructed his brother to pay The Doctor \$10,000 (on March 7, 2017). **PERDOMO** was not only familiar with the name of a major drug source used in casual conversation (The Doctor) but warned **CLAUDIO** Valdez about Cash Transaction Reports (CTRs) and that any payment over \$10,000 would trigger an investigation. All of which led me to conclude

that **PERDOMO** is a knowledgeable co-conspirator actively assisting the **VALDEZ** DTO.

130. **PERDOMO** has also acted as a lookout. **CLAUDIO** Valdez and **PERDOMO** have collaborated in an effort to detect law enforcement surveillance.

Several calls bear that out.

- On March 10, 2017, at approximately 3:55 p.m, **CLAUDIO** Valdez was observed exiting VIP Styles, a barbershop located at 319 Pocasset Ave., Providence, RI and meet with **PERDOMO**, who was seated in the driver's seat of the black Jeep. After a brief meeting, **PERDOMO** was observed leaving the area using Prudence Avenue, which is located adjacent to the barbershop. Law enforcement officers had previously established a surveillance position on Prudence Ave. At approximately 3:56 p.m., **CLAUDIO** Valdez placed a call to **PERDOMO**. During the conversation, **CLAUDIO** Valdez asked her if she saw anything. **PERDOMO** said there is a "white guy" inside the car and, when she drove past, he laid down. She said it was not the same license plate that he had given her before. **CLAUDIO** Valdez asked her if she got the license plate and she said it was "9774." **CLAUDIO** Valdez asked her to drive by again to get a closer look and told her that she has to be "smart" because "those people" are not going to use the same license plates or cars. **CLAUDIO** directed **PERDOMO** to write down the license plate and to check it. **PERDOMO** said he was skinny and in his 30's. **CLAUDIO** Valdez said the previous white male he noticed was in his 40's. At approximately 4:16 p.m., **PERDOMO** called **CLAUDIO** Valdez. During the conversation, **PERDOMO** said, "My friend checked it (license plate) and said that it's not. It's a construction company." **CLAUDIO** Valdez queried, "Oh, but you called your friend to ask him?" **PERDOMO** said that she did and declared, "I investigated it right away."

- On March 13, 2017 at approximately 8:20 p.m., **CLAUDIO** Valdez used Target Telephone IV to call **PERDOMO**. During the conversation, **CLAUDIO** Valdez told **PERDOMO** that he noticed a blue SUV following him throughout the day. **CLAUDIO** Valdez said, "I took the number ... will your friend let you know right away?" **PERDOMO** assured him, "yes." She asked for a description of the car and where **CLAUDIO** Valdez had seen it. **CLAUDIO** told **PERDOMO** to write the license plate number down and asked her what she is going to tell him (the person that is going to run the plate). **PERDOMO** responded, "I'm going to ask him to do me a favor and check that plate." **PERDOMO** then explained to **CLAUDIO** Valdez that, "If it's not registered -- then it's them. If it's registered then it's not what you are thinking." **JUAN** Valdez again asked, "What are you going to tell him?" to which **PERDOMO** replied, "That I want to know about that license plate. That I saw something weird." **CLAUDIO** Valdez then started to give the license plate of the vehicle, "4FY..." **PERDOMO** was having difficulty hearing him so **CLAUDIO** Valdez said he would text it. **CLAUDIO** Valdez did send **PERDOMO** a text message but it was not captured because the court order only authorized the interception of wire communications.
- At approximately 8:25 p.m. **PERDOMO** called **CLAUDIO** Valdez. During the conversation, **CLAUDIO** Valdez told her that he sent her the first "initials" and the others are "555 ... 575." He also said the plate was from where "Cabezon and Sandra live" (Massachusetts).¹⁷ **PERDOMO** asked if the plate was a "combination" plate or a "commercial."
- At approximately 8:49 p.m., **PERDOMO** called **CLAUDIO** Valdez and said the plate was not registered and so it is the "caballitos" (horses). She told **CLAUDIO**

¹⁷ **JUAN** Valdez is known by that nickname and "Sandra" is **RODRIGUEZ**. They live in Massachusetts.

Valdez, "Chill out, stay calm, take it easy, because something must be happening. They have some information." **CLAUDIO** Valdez pressed for more details and asked what "he" told her. **PERDOMO** said that she told him that she had seen some "weird" cars around and that she gets "nervous" because she has "little girls." **CLAUDIO** Valdez specifically asked if "he" told her it was the "caballitos." She said that he confirmed that, when it is not registered, it is. **PERDOMO** said she sent the license plate information to "him" by text and warned **CLAUDIO** Valdez to be careful.

- At approximately 8:56 p.m. **PERDOMO** called **CLAUDIO** Valdez and asked "When you saw the man, did he hide?" **CLAUDIO** Valdez said that, when he went to see if he was still there, he had moved. **CLAUDIO** Valdez stressed that he had to "change strategies" but it is "easier said than done." **PERDOMO** said, "You have to lay low for a while ... and take it easy." The pair continued to discuss law enforcement surveillance. **CLAUDIO** Valdez stated, "Damn, I don't know. That's why I have changed phones. I have changed a lot of things."

131. **PERDOMO** accurately described the license plate and general physical description of a surveillance vehicle and an officer that was conducting surveillance on Prudence St. on March 10, 2017. **CLAUDIO** Valdez also detected law enforcement surveillance because he accurately described a vehicle and license plate being used by a law enforcement officer that was conducting surveillance in the vicinity of 34 Burnside Avenue. I know that "horses" (caballitos) is a term used to describe law enforcement. This incident reaffirmed that **PERDOMO** is an active member of the VALDEZ DTO and that she has a "friend" that checks license plates for them.

132. **PERDOMO** was also monitored on March 20, 2017 collecting a drug debt. At approximately 9:45 p.m. and again at 9:50 p.m., **CLAUDIO** Valdez received incoming calls on Target Telephone IV from **PERDOMO** who was using telephone number (617) 586-9365. Both conversations were less than one minute long. During the first conversation, **PERDOMO** asked **CLAUDIO** Valdez, "How much is she supposed to give me?" **CLAUDIO** replied, "like seven and a half, something like that." **PERDOMO** was then overheard telling an Unidentified Female (UF) to "count seven-fifty" and the call ended. During the second conversation, **PERDOMO** asked **CLAUDIO** Valdez if the UF owed \$1,500, because she did not want to take extra money from the UF. **CLAUDIO** Valdez confirmed that he "gave her more ... 750 and 750 ... that's it."

133. I understood that **CLAUDIO** Valdez gave the UF drug customer \$750 worth of narcotics on two occasions and the outstanding drug debt that **PERDOMO** was collecting on his behalf was \$1,500 ("750 and 750").

134. **PERDOMO** aided and abetted the drug trafficking in other ways. Two calls bear that out.

- On March 25, 2017, at approximately 6:37 p.m., **CLAUDIO** Valdez used Target Telephone IV to call **PERDOMO**. During the conversation, **CLAUDIO** Valdez asked if she could give him a ride because he did not have a car. **CLAUDIO** Valdez explained that he did not want to walk because he had "something" in his pants and in a bag. **PERDOMO** told **CLAUDIO** Valdez that she also did not have a car available and told him to leave "it"

there. She offered to get it later. **CLAUDIO** Valdez said he would leave the "tickets" there as well.

- On March 26, 2017, at approximately 12:50 p.m., **CLAUDIO** Valdez used Target Telephone IV to call **PERDOMO**. During the conversation, **CLAUDIO** Valdez asked **PERDOMO** to get the "seasoning" that was there. He specified the "small, white, hard one." **CLAUDIO** Valdez clarified again, "grab the little hard one" and again said it was "white." He told **PERDOMO** he was coming over and for her to bring it down to the door so he can grab it.

135. During the first conversation, I understood that **CLAUDIO** Valdez was wary of walking because he would have to carry illegal drugs with him (in his pants and in a bag). **PERDOMO** told him to leave the drugs there and she would retrieve them later. **CLAUDIO** Valdez agreed and said that he would leave the money (tickets) at the location for her to pick-up too. In the second conversation "seasoning" was a drug, likely crack cocaine. **CLAUDIO** Valdez stressed that **PERDOMO** should bring him the seasoning that is "hard" and "white." White is a common code for cocaine and hard is a common code for crack cocaine.

136. Based on these conversations, and other evidence, I concluded that **PERDOMO** was a knowledgeable coconspirator who was actively aiding and abetting the VALDEZ DTO by collecting drug debts, running drugs, acting as a lookout and helping the Valdez evade detection by law enforcement by renting cars, avoiding CTR's and using a contact to check license plates of suspected surveillance vehicles.

Alexandra Garcia Montero alias Sandra RODRIGUEZ, alias Jane Doe

137. **RODRIGUEZ** (DOB 10/07/1978) is not a citizen of the United States and is believed to be here illegally but has never been previously deported. In intercepted conversations, **RODRIGUEZ** was overheard discussing her family in the Dominican Republic and I have determined that the identity on the license that she uses in the name Sandra Rodriguez is actually that of a Puerto Rican woman. Her true identity is believed to be Alexandra Garcia Montero (DOB 10/07/1978) born in Bani, Dominican Republic based on a Dominican Cedula. Throughout this investigation, this offender has been known as **RODRIGUEZ** and has been referred to as such in many reports and affidavits. Although it now appears that her true identity is Garcia, for ease of reference, I have continued to refer to her by her alias **RODRIGUEZ**. **RODRIGUEZ** is known to be **JUAN** Valdez's girlfriend or wife. They refer to each other as husband and wife but their formal legal status is not known. She lives at 24 Aberdeen Rd, Milton, MA with **JUAN** Valdez. A warrant for their residence was issued by the U.S. District Court in the District of Massachusetts. **RODRIGUEZ** has been intercepted numerous times on calls monitored pursuant to the Court's wiretap orders participating in criminal and conspiratorial conversations with **JUAN** Valdez concerning the subject offenses. **RODRIGUEZ** has the following criminal history:

- February 2009 - Distribution of Cocaine (Disposition unknown)
- November 2010 – Distribution of Heroin (Disposition Unknown)
- December 2010 – Distribution of a Class A narcotic (Guilty, 30 months of home confinement/suspended sentence)

138. JUAN Valdez used his wife or girlfriend, **RODRIGUEZ**, in his drug business. They were regularly overheard discussing the purchase, sale and quality of drugs. **RODRIGUEZ** had her own drug customers in Massachusetts that she supplied with heroin obtained from the VALDEZ DTO.

139. For example, on February 13, 2017, JUAN Valdez, received an incoming call on Target Telephone III from (781) 492-9060 (a prepaid cell phone with no subscriber) and spoke to **RODRIGUEZ**. During this conversation, **JUAN** Valdez asked **RODRIGUEZ** if people had been calling her. She responded by saying, "they seem to like it." **JUAN** Valdez remarked, "If they did not like it, they would have complained already." **RODRIGUEZ** said that a UTP called to complain but she ignored the complaint. **RODRIGUEZ** explained, "When there are eight to ten people and only one complains, [she] will ignore that person ... the other people have not said anything at all." Later during the same conversation, **RODRIGUEZ** said she was going to call a UTP and "give him a little thing." She said that she gave the UTP, "a little something of the other stuff, not this one, the other day."

140. I believe that this conversation concerned the quality of a batch of drugs which were supplied by **JUAN** Valdez and recently distributed by **RODRIGUEZ**. **JUAN** Valdez asked **RODRIGUEZ** if the drug customers had been calling her about the product. She confirmed for him that the quality of the drugs was acceptable, "They seemed to like it." **RODRIGUEZ** said that she had only received one complaint and reflected that if only one of eight to ten customers had complained, then the quality must be good enough. When **RODRIGUEZ** said she was going to give "a little thing"

to a UTP (perhaps the customer who had complained), she meant that she would provide a small quantity of narcotics and had provided a sample from a previous shipment, "a little something of the other stuff, not this one, the other day." Whatever the domestic relationship between **JUAN** Valdez and **RODRIGUEZ**, this conversation and others suggested to me that **RODRIGUEZ** is a knowledgeable member of the **VALDEZ** DTO who services her own drug customers.

141. On March 31, 2017 a number of calls were monitored concerning a heroin delivery to one of **RODRIGUEZ**'s customers, "The Cousin."

- At approximately 10:28 a.m., **JUAN** Valdez received an incoming phone call on Target Telephone V from **RODRIGUEZ** on telephone number (857) 406-9314. During the conversation, **RODRIGUEZ** told **JUAN** Valdez, "I need the thing for tomorrow." **JUAN** Valdez replied, "For tomorrow? I could have done it for you if you had told me yesterday." **RODRIGUEZ** explained, "Because I just have some left for tomorrow and maybe Sunday." **JUAN** Valdez said he would "do it" and the pair agreed to speak later during the day. Immediately following this conversation, **JUAN** Valdez called **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez told **CLAUDIO**, "I'm going to leave Sandra's thing there so the 'woman' can bring it later ... but it has to be today or tomorrow, you understand? I'm going to leave that stuff ready just in case."
- At approximately 1:04 p.m., **JUAN** Valdez was observed leaving the stash house at 103/105 Woodbine St. and drove off in a gray Nissan Altima. The Altima was watched as it travelled to Adelaide Ave. in Providence, RI. **JUAN** Valdez parked it behind **CLAUDIO** Valdez who was in the white Volvo.

CLAUDIO Valdez briefly entered the front passenger seat of the gray Altima and then returned to the white Volvo. Both vehicles left the area.

- At approximately 2:40 p.m., **CLAUDIO** Valdez was observed as he arrived back at 34 Burnside Ave. in the white Volvo. He called **CROTEAU** and said he was parked outside. **CROTEAU** said she was already inside and for him to come upstairs. **CLAUDIO** Valdez then entered 34 Burnside Ave.
- At approximately 2:52 p.m., Thomas Bonollo was observed arriving at 34 Burnside Ave. in his green GMC Yukon (MA 6365WD, registered to Bonollo). He parked behind the residence. Approximately five minutes later, **CROTEAU** left 34 Burnside Avenue. She stopped briefly at the driver's side window of the GMC Yukon and met with Bonollo. After the brief encounter, Bonollo drove away and **CROTEAU** continued to the white Volvo. **CROTEAU** then entered the Volvo and departed the area. Approximately 30 minutes later, **JUAN** Valdez was observed arriving at 34 Burnside Ave. in the gray Altima.
- At approximately 4:54 p.m., **CROTEAU** called **CLAUDIO** Valdez and said she was about 10-15 minutes away. About 15 minutes later, **CLAUDIO** Valdez called **CROTEAU** and **CROTEAU** said she was "there." At the same time, **JUAN** Valdez called **RODRIGUEZ** and asked her if the, "guys are there" (referring to the location that **CROTEAU** had driven to). **RODRIGUEZ** answered, "Let me call the cousin." **JUAN** Valdez directed **RODRIGUEZ** to tell them (The Cousin) to "come down." Approximately two minutes later **RODRIGUEZ** called **JUAN** Valdez. She said, "Tell Tanya (**CROTEAU**) not to leave so she takes the 500 pesos that the cousin is going to give her." **JUAN** Valdez replied, "No, leave that over there, I'm not going to see her."

142. Based on these conversations and surveillance, I believe that **RODRIGUEZ** asked **JUAN** Valdez to provide her with heroin (stuff) because she was about the run out. **JUAN** Valdez agreed to provide the heroin and said **CROTEAU** (the woman) would bring it. I believe **JUAN** Valdez prepared the heroin for **RODRIGUEZ** in his stash house at 103/105 Woodbine St. and then provided it to **CLAUDIO** Valdez on Adelaide Ave. I believe **CLAUDIO** Valdez then provided the heroin to **CROTEAU** at 34 Burnside Ave where they live. Prior to **CROTEAU** departing with the heroin for **RODRIGUEZ**, I believe she also provided heroin to Bonollo (a known drug customer) in a hand-to-hand transaction at the window of his car behind 34 Burnside Ave. I believe the heroin that was requested by **RODRIGUEZ** was delivered to "The Cousin." **RODRIGUEZ** was going to instruct The Cousin give **CROTEAU** \$500 but **JUAN** Valdez asked that the money not be delivered to **CROTEAU** because he did not plan to see her.

143. During the delivery, officers maintained surveillance at 24 Aberdeen Rd., Milton, MA. **RODRIGUEZ**'s gray Highlander remained parked there the entire afternoon. **CROTEAU** did not go there. Rather, I believe that **CROTEAU** made this delivery to **RODRIGUEZ**'s drug customer, "The Cousin" at 13 Maywood Street. **RODRIGUEZ** appears to supervise the drug business that is conducted at that location because 10 days earlier, on March 21, 2017, **CROTEAU** was watched by a surveillance team making a another heroin delivery to 13 Maywood St., Boston, MA. During the time-period surrounding that delivery, **JUAN** Valdez was repeatedly communicating with **RODRIGUEZ** just as he did here. Nevertheless, whether the heroin ordered by

RODRIGUEZ for The Cousin went to 13 Maywood St. or somewhere else, these communications exemplify **RODRIGUEZ's** role in heroin distributions by the **VALDEZ** DTO.

*John Doe, aka Hiram Modesto, aka Manuel, aka **COMPADRE***

144. **COMPADRE** (Approximately 50 years of age, DOB: unknown.) is a Dominican born male. Monitored calls have established that he was recently released from a prison in Bani, Dominican Republic and was brought to this country by **JUAN** Valdez after which he was set up in an apartment to run a drug distribution point in Hartford, CT. **COMPADRE** has been intercepted participating in hundreds of criminal and conspiratorial conversations concerning the business of selling heroin and cocaine base for **JUAN** Valdez. When **COMPADRE** needed more heroin to supply to **VALDEZ** DTO customers in Hartford he ordered it from **JUAN** Valdez. He was observed and photographed by surveillance officers when **JUAN** and/or **CLAUDIO** Valdez and/or **CROTEAU** drove to meet him to deliver the drugs or collect money at 67 Standish Street, Apt. 3E, Hartford, Connecticut. The U.S. District Court in Connecticut issued a search warrant for that apartment.

145. On February 26, 2017 at approximately 1:05 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from the person he referred to as **COMPADRE**. During the conversation, **COMPADRE** told **JUAN** Valdez that he brought an "old man" "one" yesterday from the "brownest" and that he liked it. **COMPADRE** said the old man wanted him to bring him 10 and to give him 10 on credit. The old man "is going to get me a couple more people ... even people of 200 ...

300." **JUAN** Valdez agreed that they like the "darker" one "there" (referring to Hartford). **COMPADRE** expounded, "they don't like the white because they are afraid ... because there is white killing people." **COMPADRE** explained that people there ask him if that is the "one" that is killing people and he told them "no." **JUAN** Valdez responded, "it's because they are afraid ... because they think it is that one and it is not that one." **COMPADRE** continued, "It's synthetic. The one that is killing many people here." **JUAN** Valdez agreed, "Exactly, but this one don't ... this one is not like that." Later in the conversation, **COMPADRE** told **JUAN** Valdez that he gave a UTP "the three samples" to try. **JUAN** Valdez inquired, "Did the other man like that color also? The one for the 400 pesos." **COMPADRE** reported that the UTP did like the color and that the UTP said, "I'm going to buy everything you have." **COMPADRE** then asked **JUAN** Valdez to bring him "100" and **JUAN** Valdez said he would bring "200" or "300" tomorrow afternoon. The pair discussed **JUAN** Valdez providing a vehicle for **COMPADRE** to enable **COMPADRE** to pick "it" up. The pair also agreed that business will pick-up and that **COMPADRE** wanted to "make money." **COMPADRE** proclaimed, "I have always had to fight to move forward. I don't like to get it the easy way."

146. Based on this conversation, I believe **COMPADRE** was explaining to **JUAN** Valdez that his potential customers liked brown heroin and that they are scared of the "white" or "synthetic one" that is killing people. I believe the substance they were discussing was fentanyl. **JUAN** Valdez assured **COMPADRE** that the white one he previously provided **COMPADRE** was not fentanyl. I further believe that the pair

discussed a potential customer that would be buying 400 grams of heroin and that **JUAN** Valdez agreed to bring between 200 and 400 grams of heroin to **COMPADRE** the following afternoon.

147. The following afternoon, on February 27, 2017 at approximately 12:46 p.m., **JUAN** Valdez placed an outgoing phone call on Target Telephone III to **COMPADRE**. During the conversation, **JUAN** Valdez said, "I'm going to be on my way in a little while ... I am going to start going there in a little while." **COMPADRE** responded, "Alright, call me when you are close." **JUAN** Valdez asked, "And the guy for the 400 pesos ... did you call him?" **COMPADRE** responded, "No, I have not called him. I was waiting for you. I will call him now. I will hit him up now." **JUAN** Valdez directed, "Tell him the work is ready."

148. During this conversation, I believe **JUAN** Valdez told **COMPADRE** he was preparing to bring him a shipment of heroin and asked if **COMPADRE** had spoken to the customer that wanted 400 grams, which he referred to as "400 pesos." In this investigation, "Pesos" has been used interchangeably to refer to drugs in grams and kilograms as well as to money in dollars and thousands of dollars. The context of the conversation determined the meaning. When **JUAN** Valdez told **COMPADRE** to inform the customer that "the work is ready" he used the word "work" to mean heroin which is a common code or term used in drug trafficking.

149. From approximately 1:30 p.m. to 3:03 p.m., law enforcement surveillance officers watched a white Nissan Altima (MA 3RV 856) drive from Providence, RI to 67 Standish St. in Hartford, CT. According to rental records, the Nissan Altima was rented

by **CROTEAU** from Hertz Rental Car on or about February 16, 2017. The white Altima was driven by **CROTEAU**. **JUAN** Valdez was the front seat passenger and **CLAUDIO** Valdez was the rear seat passenger. At about the time they arrived on Standish St. in Hartford, **JUAN** Valdez used Target Telephone III to place a call to **COMPADRE**. **JUAN** Valdez said, "I'm here now. What is the number **COMPADRE**?" **Compadre** answered, "67 ... go in the back. I saw you." **JUAN** Valdez, **CLAUDIO** Valdez and **CROTEAU** were then seen leaving the Altima and entering apartment 3E at 67 Standish Street. I believe **JUAN** Valdez, **CLAUDIO** Valdez and **CROTEAU** delivered the agreed upon 400 grams of heroin to **COMPADRE** at his residence located at 67 Standish Ave., Apt. 3E, Hartford, CT.

150. On February 28, 2017, **JUAN** Valdez used Target Telephone III to speak with **COMPADRE** several times. During the first conversation, **JUAN** Valdez directed **COMPADRE** to buy some furniture for his new apartment so **COMPADRE** could settle in and feel comfortable. He also directed **COMPADRE** to buy some blinds for the windows. During a second conversation, **COMPADRE** told **JUAN** Valdez he was giving "it" to a UTP at "40" and that the UTP was going to take "50" right now. **JUAN** Valdez responded, "He wants it cheap ... damn ... 40 is very low." **COMPADRE** explained, "I told him that I was going to call him and if he pays 45 - yes." **JUAN** Valdez observed, "45 is also low." He encouraged **COMPADRE** to get "50." During a third conversation, the pair continued to discuss selling "it" at 45 or 50. **COMPADRE** confirmed that the UTP that was getting the 400 agreed to do it at 50. **JUAN** Valdez told **COMPADRE**, "That price is more reasonable."

151. I believe that **JUAN** Valdez was helping **COMPADRE** get established at his new apartment in Hartford to assist in the distribution of heroin.¹⁸ During this conversation, I believe **JUAN** Valdez and **COMPADRE** were discussing the price per gram of heroin. I believe **JUAN** Valdez expressed to **COMPADRE** that \$40 or even \$45 per gram of heroin was too low and that **COMPADRE** should attempt to get \$50 per gram of heroin. **COMPADRE** reported that the customer who was buying 400 grams agreed to do it at \$50 per gram (\$20,000). **JUAN** Valdez agreed that was more reasonable.

152. On March 1, 2017 at approximately 5:50 p.m., **JUAN** Valdez used Target Telephone III to call **COMPADRE**. During the conversation, **COMPADRE** told **JUAN** Valdez that he just gave a UTP "20" and that another UTP is coming tomorrow for "50." I believe the two men were discussing heroin sales. As a way of tracking inventory, **COMPADRE** informed **JUAN** Valdez that he sold 20 grams of heroin to one UTP and that another UTP was buying 50 grams.

153. On March 2, 2017 at approximately 2:24 p.m., **JUAN** Valdez used Target Telephone III to call **COMPADRE**. During the conversation, they discussed potential sale prices for "it." **JUAN** Valdez advised **COMPADRE**, "The thing is we need to have

¹⁸ Electric service records obtained from EVERSOURCE established that a new electrical account was established at 67 Standish St., Apt. 3E, Hartford, CT on or about February 14, 2017. The account was established in the name of Rene Ramos (DOB: 05/10/1965). According to CT DMV records, Ramos lives at 52 Temple Drove., East Hartford, CT. Based on his license information and photo, Ramos is not the individual that met with **JUAN** Valdez, **CLAUDIO** Valdez and **CROTEAU** on February 27, 2017. However, based on intercepted phone calls I believe this electric account was established on or about the day **COMPADRE** moved into the referenced apartment.

patience ... because damn ... 40 is bad." **COMPADRE** agreed and said he wanted to start "little by little" and then they will "increase the volume." **JUAN** Valdez told **COMPADRE** that if "he is going to buy 400 pesos together he could get it at that ... it cannot be given at 40, because 40 is not enough, you understand?" **COMPADRE** agreed, "At 45, minimum."

154. I believe that the two men were again discussing heroin sales. **JUAN** Valdez stressed patience to **COMPADRE** counselling him not to sell at \$40 per gram because that price was too low. Based on this conversation, I believe **JUAN** Valdez and **COMPADRE** agreed that if a customer agreed to buy in a bulk weight of 400 grams of heroin at a time then \$45 per gram was an acceptable price (\$18,000).

155. On March 4, 2017 at approximately 5:43 p.m., **JUAN** Valdez used Target Telephone III to call **COMPADRE**. During the conversation, the pair spoke about their family members that are currently living in the Dominican Republic. **COMPADRE** also expressed his appreciation for **JUAN** Valdez always being there to help him. **COMPADRE** thanked **JUAN** Valdez for helping him when he (**COMPADRE**) was in jail in Bani. **COMPADRE** said that when he first came to the United States he came to Boston, MA but his nieces and nephews did not give him any help. During the conversation, **JUAN** Valdez addressed **COMPADRE** as "Manuel" and mentioned that he (**JUAN** Valdez) sent Manuel money so he could come to the United States. I concluded that **COMPADRE** is a Dominican male that **JUAN** Valdez brought to the United States specifically to assist him in the heroin trafficking operation of the **VALDEZ** DTO.

156. On March 8, 2017, at approximately 9:33 a.m., **JUAN** Valdez used Target Telephone III to speak to **COMPADRE** on telephone number (978) 208-9664. During the conversation, **JUAN** Valdez asked **COMPADRE** if anything "moved." **COMPADRE** responded, "Things are moving slowly." He explained that he received complaints about the "product" being "weak." **COMPADRE** explained that people wanted it "brown" and "stronger." **COMPADRE** said a UTP bought "30" the day before yesterday and now wants "50." **JUAN** Valdez said next time he will "make it darker" and asked **COMPADRE** how much he had left. **COMPADRE** said he had about "115" left. **JUAN** Valdez said "they" will finish that one and the next batch will be darker.

157. Later that same day, **JUAN** Valdez used Target Telephone III to speak about **COMPADRE** with Pedro Lugo Ayala aka "Indio" on telephone number (203) 214-7346. At approximately 7:07 p.m. he called Ayala and, during the conversation, asked Ayala (who he referred to as Indio) if he had been to see **COMPADRE**. Indio said that he had, two days ago. Indio also said that he planned to go there again on Saturday for "30." **JUAN** Valdez said the stuff **COMPADRE** had was "good" and "strong." He rated it an "8.5." Indio agreed. He said the "stuff" was good and that he gave "it" to be "tested" by a couple people and they confirmed that it was good. Indio told **JUAN** Valdez that during the summer things will get good when everyone is out in the streets. **JUAN** informed Indio that he planned to bring some "white" tomorrow, which he described as "cooked." Indio responded that the "white" moves a lot around his place. The pair then discussed the difficulties of "moving" product without a

vehicle (referring to one with a hide). **JUAN** Valdez explained that **COMPADRE** was trying to find someone to register a black truck for him right now. **JUAN** Valdez described **COMPADRE** as his "right-hand" man.

158. In these two conversations "brown" was understood to be heroin and drugs are often referred to as "product." The cryptic references to the numbers 30, 50 and 115 were references to the weight of heroin in grams. The complaints that the product was not strong enough and that customers wanted it "brownier" led **JUAN** Valdez to offer to make the next batch "darker" meaning containing more heroin. "White" is cocaine, which when "cooked," is crack cocaine. **COMPADRE** explained to **JUAN** Valdez that business was slow, meaning he was not selling as much heroin as he would like. But, he had a customer buy 30 grams and wanted 50 more. **COMPADRE** informed **JUAN** Valdez that he had 115 grams left in inventory. **JUAN** Valdez also spoke to Ayala about the heroin **JUAN** Valdez delivered to **COMPADRE** presumably as a way to check up on his employee **COMPADRE**. Ayala confirmed that he had it tested and vouched for the quality. **JUAN** Valdez told Ayala that in addition to bringing heroin to **COMPADRE**, he was also going to bring the "white ... cooked" stuff, which I know to be slang for crack cocaine. **JUAN** Valdez wanted to deliver more to **COMPADRE** as soon as possible so he would not run out ("things might finish").

159. On March 9, 2017, at approximately 5:26 p.m., **JUAN** Valdez used Target Telephone III to speak to **COMPADRE**. During the conversation, **JUAN** Valdez told **COMPADRE** he was going to try to go "there" tomorrow (referring to **COMPADRE**'s

apartment in Hartford). **JUAN** explained that he wanted to go there soon because “things might finish” all of a sudden.

160. Snow on March 10, 2017 delayed the proposed delivery. On March 11, 2017 a number of telephone calls placed on both Target Telephone III and Target Telephone IV were intercepted concerning this transaction while physical surveillance was maintained on **CROTEAU**, **JUAN** Valdez and **CLAUDIO** Valdez:

- Prior to the drug run, at approximately 11:11 a.m., **JUAN** Valdez was observed arriving at his stash house, located at 103/105 Woodbine St., Cranston, RI in a white Nissan Altima.¹⁹ A short time later, **JUAN** Valdez left 103/105 Woodbine St. and was observed by surveillance officers meeting with **CLAUDIO** Valdez and **CROTEAU** on Anthony St. in Providence near Inner City Auto Sales. (**CLAUDIO** Valdez and **CROTEAU** had arrived on Anthony St. a short time earlier in **CROTEAU**'s silver BMW Wagon.) At approximately 11:40 a.m., **CROTEAU** was observed getting into the white Altima. **JUAN** and **CLAUDIO** Valdez were observed entering the silver BMW wagon. Both vehicles left the area. From approximately 11:40 a.m. to 1:20 p.m., surveillance officers followed **CROTEAU** in the white Altima from Providence, RI to 67 Standish St., Hartford, CT.
- About 9 minutes later, at 11:49 a.m., **CROTEAU** called **CLAUDIO** Valdez on Target Telephone IV to inform him that she should be arriving at about 1:15 p.m. or 1:20 p.m.

¹⁹ Rented by Tonya **CROTEAU** on February 16, 2017 from Hertz Rental Car, Massachusetts plate, 3RV 856.

- At approximately 12:57 p.m., **CROTEAU** called **CLAUDIO** Valdez on Target Telephone IV and told him that she was 20 minutes away. **CLAUDIO** Valdez acknowledged her information and said he was going to call his friend.
- Immediately after receiving the call from **CROTEAU**, **CLAUDIO** Valdez (Target Telephone IV) called **JUAN** Valdez (Target Telephone III). During the conversation, the pair discussed the arrival of the "old lady" (**CROTEAU**) in 20 minutes. **JUAN** Valdez said he would call **COMPADRE** and let him know. **CLAUDIO** Valdez reminded **JUAN** Valdez to tell **COMPADRE** that there would be "two things" (referring to heroin and the crack cocaine).
- While still subject to surveillance, **CROTEAU** arrived at 67 Standish St., Hartford, CT at approximately 1:20 p.m and parked to the rear of the residence. She immediately called **CLAUDIO** Valdez (Target Telephone IV). During the conversation, **CROTEAU** confirmed that she had just arrived. **CLAUDIO** Valdez said he would call his friend but **CROTEAU** said, "He is right here." **COMPADRE** then used **CROTEAU**'s phone to speak with **CLAUDIO**. **COMPADRE** told **CLAUDIO**, "I came down with everything. We are already doing that." **CLAUDIO** told **COMPADRE** to call **JUAN** Valdez later when everything was "good."
- **CROTEAU** left 67 Standish St. at 1:47 p.m in the white Altima while under surveillance. Approximately two minutes later, she placed a call to **CLAUDIO** Valdez (Target Telephone IV) informing him that she had just left.
- At approximately 3:24 p.m., **CROTEAU** placed a call to **CLAUDIO** Valdez (Target Telephone IV) to tell him that she had just been in a traffic accident. Surveillance officers observed **CROTEAU** and the white Altima on the side of Rte. 6 in Johnston, RI, along with police and fire personnel. The Altima had minor damage to the rear of the vehicle. Following the accident, **CROTEAU**

was brought to Rhode Island Hospital for evaluation. At approximately 4:55 p.m., **CLAUDIO** Valdez picked **CROTEAU** up at Rhode Island Hospital and then briefly met with **JUAN** Valdez in south Providence.

- At approximately 5:00 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from **RODRIGUEZ**. **JUAN** Valdez observed that if **CLAUDIO** had been in the car with **CROTEAU** then maybe the accident would not have happened. **JUAN** Valdez reflected that **COMPADRE** sent “9 pesos” and “they are lucky it didn’t get lost.”
- At approximately 5:20 p.m., **JUAN** Valdez used Target Telephone III to call **COMPADRE**. During the conversation, **JUAN** Valdez told **COMPADRE** that “the girl,” (referring to **CROTEAU**) was in a car accident but the money was safe. **JUAN** explained that the girl gets “nervous” when she is alone and that she drives well when he (**JUAN** Valdez) is with her. **JUAN** Valdez told **COMPADRE** that **CROTEAU** was a good “worker.” **COMPADRE** reflected that he (**JUAN** Valdez) must trust her because she came alone to collect the money. **JUAN** Valdez confirmed her loyalty, “She doesn’t take one single dollar.” He explained that the car involved in the accident was a rental and that it had full insurance. He predicted that **CROTEAU** was going to get some money as a result. Later in the conversation, **JUAN** Valdez asked **COMPADRE** if he noticed that what **CROTEAU** brought was “darker.” **COMPADRE** confirmed that he had noticed the darker color. **COMPADRE** said he already gave some to a “guy to check” and the UTP said it was much better than the last. The men also discussed “the papers.” **COMPADRE** said the papers were in an envelope that he gave **CROTEAU**.

161. Based on my training and experience, as well as my participation in this investigation I believe that on March 11, 2017, **JUAN** Valdez went to his stash house at

103/105 Woodbine St. to retrieve the drugs from where they were stored. He left with the drugs in the rental car to meet **CLAUDIO** Valdez and **CROTEAU**. They switched vehicles so that **CROTEAU** would not have to use her own car to make the drug delivery. **CROTEAU** drove the rental, with the drugs, to 67 Standish St. in Hartford, CT for delivery to **COMPADRE**. Based on the accident and the conversations that followed, I also believe that **COMPADRE** gave **CROTEAU** \$9,000 to bring back to **JUAN** Valdez, which he referred to as "nine pesos." The \$9,000 represented drug proceeds from the previous heroin shipment that **JAUN** Valdez provided **COMPADRE** on February 27, 2017. Although "papers" could have referred to the drug money, based on previous intercepted conversations between **COMPADRE** and **JUAN** Valdez, this was likely a reference to documents to be used to fraudulently obtain a driver's license for **COMPADRE**.

162. On March 18, 2017 there was a series of telephone calls related to the quality of the drugs that had been previously delivered to **COMPADRE**.

- At approximately 1:47 p.m., **JUAN** Valdez received an incoming phone call on Target Telephone III from **COMPADRE**. During the conversation, **COMPADRE** informed **JUAN** Valdez that customers were complaining about the quality of the "product" saying that the last one was better than the current one. **JUAN** Valdez explained that customers cannot expect to buy "it" so cheap and still expect to put "work on it." **COMPADRE** said he is selling it at "50" and that he recently sold some product to "Indio" (**AYALA**) so **JUAN** Valdez can call Indio and verify the quality of the product. **JUAN** Valdez suggested that **COMPADRE** sell the product at "40" and not make a profit. However, he (**JUAN** Valdez) had been selling the same product here

(Providence) and customers were not complaining. **JUAN** Valdez told **COMPADRE** that "they" need to get rid of this product because there is new product coming in soon. **JUAN** Valdez informed **COMPADRE** that he was going to send "Radhame" (**CLAUDIO** Valdez) and "the girl" (**CROTEAU**) to get the product from **COMPADRE** so he (**JUAN** Valdez) can make it "harder." **JUAN** Valdez assured **COMPADRE** that once he makes it harder it will sell. **COMPADRE** told **JUAN** Valdez that he now has prospective customers in Springfield, MA. **JUAN** Valdez warned **COMPADRE** about trusting too many people.

- At approximately 2:07 p.m., **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez told **CLAUDIO** Valdez that they have to go get the "shit" from **COMPADRE** to "fix" it. **JUAN** Valdez said he has to "move" that shit even if he "loses." **CLAUDIO** Valdez said he would call "Tanya" (**CROTEAU**) and see if she can go pick it up. **JUAN** Valdez said he will fix it and then she can bring it back to **COMPADRE** on Monday.
- Immediately following this conversation, **CLAUDIO** Valdez called **CROTEAU** and asked her to make the trip to Connecticut. **CLAUDIO** Valdez explained that the "stuff" is not good and that "Canita" (**JUAN** Valdez) needed to fix it. Afterwards they will bring it back. **CLAUDIO** Valdez told **CROTEAU** to use the "white car," referring to a white Volvo that **JUAN** and **CLAUDIO** Valdez recently purchased. **CLAUDIO** Valdez and **CROTEAU** spoke several more times over the course of the next couple hours. During the conversations, **CLAUDIO** Valdez said he was getting the brakes fixed on the vehicle at "Juancito's" (60 Elmwood Ave., Providence, RI) and directed **CROTEAU** to drive there to pick up the vehicle. At approximately 2:59 p.m., **CROTEAU** and an Unidentified Female (UF) were

observed leaving 34 Burnside Ave. in **CROTEAU's** silver BMW wagon (RI 451 613). At approximately 3:45 p.m., **CLAUDIO** Valdez and **CROTEAU** again spoke. During the conversation, **CROTEAU** said she was at the garage and **CLAUDIO** Valdez said the brakes were nearly finished.

- At approximately 4:29 p.m., **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez to inquire if **CROTEAU** had left yet. **CLAUDIO** Valdez confirmed that she was just about to leave but **JUAN** Valdez complained that she would be returning too late for him to get "it" from her. **JUAN** Valdez instructed his brother **CLAUDIO**, "You keep it then. Keep it secured. I won't go. Keep it and put it away." **CLAUDIO** Valdez assured him, "I will keep it safe."
- At approximately 5:27 p.m., **CLAUDIO** Valdez (Target Telephone IV) called **JUAN** Valdez on Target Telephone III. **CLAUDIO** advised that **CROTEAU** was in route to Connecticut with her cousin, who he described as a lesbian woman that "Bolivar" (**HECTOR** Valdez) knows well.
- Immediately after this phone call, **JUAN** Valdez used Target Telephone III to call **COMPADRE**. During the conversation, **JUAN** Valdez informed **COMPADRE** that the "American girl" (**CROTEAU**) was going over there and to "give her the first thing I gave you ... the white stuff, all of that. Hold on to the last thing ... the good stuff." **COMPADRE** acknowledged the instructions and then asked, "When can you send it, in case someone comes ... Monday, Tuesday ..." **Juan** Valdez replied, "Monday" assuring **COMPADRE** that he will "fix" it and make it "stronger" in order to "get rid of it."

- At approximately 6:52 p.m., **CROTEAU** called **CLAUDIO** Valdez to tell him that she had arrived. In turn, **CLAUDIO** Valdez called **JUAN** Valdez on Target Telephone III to inform him of **CROTEAU**'s arrival. At that same time, surveillance officers observed **CROTEAU** arrive at 67 Standish St., Hartford, CT in the white Volvo. **CROTEAU** was the driver of the vehicle and an unidentified female accompanied her. The white Volvo parked to the rear of the residence.
- About nine minutes later, at approximately 7:01 p.m., **JUAN** Valdez received an incoming call from **COMPADRE**. During the conversation, **COMPADRE** confirmed that he was meeting with **CROTEAU**. At approximately 7:08 p.m., **CROTEAU** and the UF were observed leaving the driveway of 67 Standish St. in the white Volvo.
- At approximately 9:16 p.m., **JUAN** Valdez used Target Telephone III to place an outgoing call to **COMPADRE**. During the conversation, **JUAN** Valdez said he would bring the product back to **COMPADRE** on Monday. **COMPADRE** also told **JUAN** Valdez that he spoke to Indio and that Indio said the product was "very good." **JUAN** Valdez told **COMPADRE** that Indio knows many people and that **COMPADRE** can connect with those people this summer.

163. Based on these calls and surveillance, coupled with my training and experience, I believe that **COMPADRE** claimed that he was getting complaints about the quality of the lighter colored heroin that **JUAN** Valdez previously delivered and they had previously discussed. **JUAN** Valdez decided to retrieve the heroin that people were complaining about in order to re-cut it, to make it stronger ("harder") so **COMPADRE** would be able to sell it. I believe that **JUAN** Valdez wants to get rid of

the "white" heroin because of the issues he has had selling it and that he expects a new shipment of brown heroin. **CLAUDIO** Valdez arranged for **CROTEAU** to make the trip to Hartford in the white Volvo that he a **JUAN** recently purchased because the vehicle has had a secret compartment (hide) installed in it at the auto body shop.

164. On March 26, 2017, at approximately 1:28 p.m., **CLAUDIO** Valdez received an incoming phone call on Target Telephone IV from **JUAN** Valdez on Target Telephone III. During the conversation, **JUAN** Valdez expressed his concerns about **COMPADRE** in Hartford, CT. **COMPADRE** was continuing to tell **JUAN** Valdez that the "stuff is not good." **JUAN** told **CLAUDIO** Valdez that he suspected that **COMPADRE** was selling "it" at "50" while reporting that he was forced to sell "it" at "40" due to its poor quality. **JUAN** Valdez said that **COMPADRE** could be profiting "10 points." **JUAN** Valdez said that he wanted to go to Hartford to watch **COMPADRE** to see what kind of business he is doing because **JUAN** Valdez knew that "the stuff" he had provided to **COMPADRE** is good.

165. In this conversation, I understood that **JUAN** Valdez suspected that **COMPADRE** was lying to him about the quality of the heroin in order to steal the profits. **JUAN** Valdez calculated that **COMPADRE** was selling the heroin at \$50 per gram but complaining about the quality to falsely claim that he was selling at \$40 per gram and pocketing the difference.

166. On March 30, 2017, at approximately 11:45 a.m., a uniformed officer from the Hartford, CT Police Department knocked on the door of 67 Standish St., Apt. 3E, Hartford, CT in an effort to make contact with **COMPADRE**. Despite hearing sounds

of someone inside the apartment, no one opened the door. The officer then went outside the apartment building. A short time later, the officer observed **COMPADRE** towards the rear of building and approached him. **COMPADRE** told the officer his name was "Hiram" and that he resided in "Apartment 3E" with his girlfriend. He produced a Puerto Rican birth certificate in the name of "Hiram Modesto" as a form of identification. **COMPADRE** told the officer he had additional forms of identification in his apartment and indicated that he would go inside in order to obtain the documents. **COMPADRE** then entered the apartment building and did not come back out. After waiting for a brief period of time, the police officer cleared the area. This police contact confirmed that **COMPADRE** lives and works out of Apartment 3E and resulted in several pertinent interceptions:

- At approximately 12:36 p.m., **COMPADRE** called **JUAN** Valdez and told him that a police officer had just knocked on his door and that the police officer asked for his "ID." **COMPADRE** said he told the officer that he left his ID at his girlfriend's and then "left there as fast as I could." **JUAN** Valdez asked **COMPADRE** if he had his ID from "El Patio" (Dominican Republic) and **COMPADRE** said, "I have that somewhere else. I would not have given him that either because that is just to come here ... if they ask me for that and they put it in the computer ... that is not legal." The pair then discussed how they need to get **COMPADRE** an ID as soon as possible. **JUAN** said, "We have to get you one for 45 or something like that." **COMPADRE** said he was going to stay with someone else for a week.
- At approximately 12:41 p.m., **CLAUDIO** Valdez called **JUAN** Valdez. During the conversation, **JUAN** relayed what had just happened to

- COMPADRE** and expressed the urgency with which they have to get **COMPADRE** an ID. **JUAN** Valdez told **CLAUDIO** Valdez to “tell her that even if it is 40, 45, it doesn’t matter...tell her to get it...the age doesn’t matter.” **CLAUDIO** Valdez agreed to “call the woman to see what’s up.”
- At approximately 12:44 p.m., **CLAUDIO** Valdez called an Unidentified Female (UF) on telephone number (857) 312-1453. During the conversation, **CLAUDIO** Valdez asked, “What happened with the newspaper?” The UF replied, “I told you that I sent three of those things and the three went out ... now they are checking two more.” **CLAUDIO** told the UF that this one has to be “45” and that they guy is “desperate.” The UF laughed and said that she has three desperate people right now. **JUAN** Valdez persisted, “He is half a century, but he’ll take whatever.” The UF agreed to do what she could.
 - At approximately 1:06 p.m., **JUAN** Valdez called **COMPADRE** and continued to talk about how important it is to get **COMPADRE** an ID as soon as possible. **JUAN** Valdez told **COMPADRE** to ask if he can “change an ID from there ... from the Island.” **COMPADRE** asked, “At Motor Vehicles?” **JUAN** Valdez affirmed and said if **COMPADRE** can change that, “the woman can get you one ... and you change that and they give you one right away.” **JUAN** Valdez switched the conversation to heroin and asked **COMPADRE** how much he had left. He reminded **COMPADRE**, “You had like 190.” **COMPADRE** said he sold 40 to “Gordo” and some to “Indio” and that he had it written down on a paper in the apartment. The pair then discussed expenses and **COMPADRE** said the electric bill this past month was \$300 and that the bill was in the name of the guy that rented the apartment.

167. Based on these conversations, I believe that **COMPADRE** is using an alias of "Hiram Modesto." I also believe that **JUAN** and **CLAUDIO** Valdez are searching for an ID (newspaper) for **COMPADRE**. They will accept an ID that does not perfectly match **COMPADRE**'s age, which is approximately 50 (half a century). I believe that during the accounting, **COMPADRE** had 190 grams of heroin left before he sold 40 grams to "Gordo" and an unknown amount to "Indio" (Pedro Lugo Ayala). I also believe that Apartment 3E was rented in the name Rene Ramos; the same name in which the electric is billed.

Tanya CROTEAU

168. **CROTEAU** (DOB 05/15/1979). **CROTEAU** is a U.S. Citizen. **CROTEAU** resides in the same apartment building as **HECTOR** Valdez at 34 Burnside Avenue. However, she lives in the basement apartment of that building. Based on the facts outlined in this affidavit, a search warrant is being requested for her apartment. **CROTEAU** has been a drug runner and money courier for **HECTOR** Valdez for at least three years. Investigation has shown that **CROTEAU** is the primary courier for the **VALDEZ** DTO. She has been intercepted on calls monitored pursuant to the Court's wiretap orders participating in hundreds of criminal and conspiratorial conversations with members of the **VALDEZ** DTO. **CROTEAU** has no known criminal history.

169. In addition to participating in numerous criminal and conspiratorial conversations monitored in this wiretap investigation, **CROTEAU** personally

participated in 11 of the 26 controlled transactions summarized in the buy/payment chart between **HECTOR** Valdez and CS #1. She used the Silver BMW and white Volvo to make those drug deliveries or drug debt collections. Those transactions were all video and/or audio recorded. As previously described in this affidavit, **CROTEAU** also ran drugs to **COMPADRE** in Hartford for the VALDEZ DTO and was a money courier bringing drug profits back to Providence. **CROTEAU** was determined to be a long time and trusted drug courier and member of the VALDEZ DTO. Investigation established that, on a daily basis, she was tasked with dropping off drugs and collecting money.

170. In addition to the other incidents in which **CROTEAU** was heard and observed running drugs and cash for the VALDEZ DTO there was an occasion in which she acquired a large amount of the cutting agent, lactose powder, for the organization. On January 17, 2017, law enforcement investigators working on this case were notified by a Chicago-based company that **CROTEAU** had inquired about placing an order for 300 pounds of lactose powder. The Company reported the order to law enforcement because personal consumers of their product for dietary purposes would not typically order more than a few pounds of lactose powder in a single order. The company suspected that this order was placed for an illicit purpose. I know, based on my training and experience, that lactose powder is frequently used to cut heroin in order to increase its volume and thereby provide greater profits to heroin dealers. Used for that purpose, the lactose powder ordered by **CROTEAU** would be incorporated into an

equal or larger weight of heroin, again suggesting to me that the VALDEZ DTO is a large-scale, multi-kilogram, heroin trafficking operation.

171. On January 18, 2017, the Chicago-based company notified me that they had agreed to sell **CROTEAU** 100 pounds of powdered lactose. She directed the order to be shipped to her sister, Crystal Croteau, at 165 2nd Ave., Woonsocket, RI. The order was placed the over the phone using a telephone number known to be used by **CROTEAU**.

172. On January 23, 2017, the SSTF and I participated in a controlled delivery of the 100 pounds of lactose powder to 165 2nd Ave., Woonsocket, RI. The lactose powder was delivered in two 50-pound boxes by an undercover postal inspector. Crystal Croteau signed for the two packages. Surveillance agents then watched **CROTEAU**'s father, Ronald Tetreault, pick-up the boxes and drive to 34 Burnside Ave. **HECTOR** Valdez and **CROTEAU** both live at that address. **HECTOR** Valdez entered Tetreault's vehicle and drove with him to a stash house (referred to variously as the nest, the hut and other code names) at 87 Dulude Ave., Woonoscket, RI. The building located at that address is a multi-family residence that the Valdez brothers and **CROTEAU** have been seen going to with great frequency. The surveillance team saw **HECTOR** Valdez and Tetreault carrying the two boxes inside 87 Dulude Avenue and then leaving the residence empty-handed. This incident reinforced my belief that this site is a stash house and a location at which heroin is processed for distribution.

173. On February 8, 2017, from approximately 9:15 a.m. to 11:23 a.m., **CROTEAU** and **CLAUDIO** Valdez were observed at 87 Dulude Avenue in

Woonsocket. At approximately 11:23 a.m., **CROTEAU** and **CLAUDIO** Valdez were seen by surveillance agents that day as they left 87 Dulude Ave. carrying a somewhat distinguishable cardboard box and a large black trash bag with a red tie. The pair placed the items in the rear of **CROTEAU**'s silver BMW. **CROTEAU** was then watched by surveillance agents as she drove to the rear of 46/48 Burnside Ave. **CROTEAU** drove to the back of the multi-car parking lot behind the apartments and parked adjacent to a dumpster. Although it was not possible to see her put the trash bag and box into the dumpster there was no other apparent reason for parking next to it. She was then observed parking her silver BMW behind 34 Burnside Ave., where she and **HECTOR** Valdez live, and entering that apartment building.

174. Later that evening, law enforcement officers conducted a trash pull and recovered the cardboard box and trash bag that **CROTEAU** and **CLAUDIO** Valdez removed from 87 Dulude Ave. earlier that day. A cardboard produce box labeled "Big Ivan Tree" and "Great Aloe Vera Leaves, Premium Best Top Quality" along with a black plastic garbage bag with a red tie were seized from on top of the trash in the dumpster. I have since learned that Big Ivan Tree is a company headquartered in McAllen, Texas that imports produce from Mexico. The items located inside the trash bag included four empty 24 ounce bottles of lactose powder, two empty 16 ounce cans of lactose powder, one empty one-pound bag of lactose powder, a digital scale box, rubber gloves, sandwich baggies, vacuum seal bags and cellophane wrapping. Based on my experience, I know that these items are used to cut, process and distribute heroin. The approximately nine pounds of empty powdered lactose containers are

equivalent to about four kilograms of "cut." That amount of cut is indicative of a multi-kilogram drug distribution operation. In addition, the size and shape of the cellophane wrapping was consistent with having been removed from two kilograms of narcotics. I also recognized the empty one-pound bag of lactose to be the same type of lactose that was ordered by **CROTEAU**, delivered by undercover officers, and brought to 87 Dulude Ave. by Tetreault and **HECTOR VALDEZ**.

Jafir MUNIR

175. **MUNIR** (DOB: 07/15/1956) is a U.S. Citizen. He resides at 3 Dinero Drive, Smithfield, RI. **MUNIR** is a prolific drug customer of **JUAN** and **CLAUDIO Valdez** and is himself a drug dealer. **MUNIR** has the following criminal history:

- October 1977 – Possession of a Firearm, Armed Robbery (Guilty, Sentence unknown)
- March 1979 – Armed Robbery (Guilty, Sentence unknown)
- October 1979 – Trespassing (Guilty, Sentence unknown)
- February 1980 – Armed Robbery (Guilty, Sentence unknown)
- September 1980 – Armed Robbery (Dismissed)
- May 1981 – Assault and Battery (Dismissed)
- May 1981 – Disturbing the Peace (Guilty, Sentence unknown)
- July 1983 – Disturbing the Peace (Guilty, Sentence unknown)
- December 1984 – Breaking and Entering (Disposition unknown)
- February 1988 – Assault and Battery, Rape (Disposition unknown)
- March 1988 – Breaking and Entering, Assault with a Dangerous Weapon (Disposition Unknown)

176. During this wiretap investigation, **MUNIR** was one of **JUAN** and **CLAUDIO**'s most regular drug customers. **MUNIR**, a drug dealer himself, used the

VALDEZ DTO as his source of supply. **MUNIR** ordered heroin and cocaine from the Valdez brothers on an almost daily basis throughout the course of this investigation. He ordered relatively small quantities of controlled substances but in amounts greater than would be consistent with personal use and he discussed his customers in recorded conversations. **MUNIR** has been intercepted daily engaged in criminal conversations concerning the subject offenses. Surveillance teams observed and photographed **MUNIR** on numerous occasions meeting briefly with **CLAUDIO** Valdez, **JUAN** Valdez and/or **CROTEAU** after being intercepted ordering heroin and cocaine. I will describe a few of the many drug deals representative of his daily trafficking activity that occurred over the entire period of investigation.

177. On February 10, 2017, **JUAN** Valdez using, Target Telephone III, had a series of conversations with **MUNIR** who was utilizing telephone number 508-944-1089 (a prepaid telephone with no subscriber). During the conversations, **MUNIR** told **JUAN** Valdez he wanted "four white" at 12 o'clock. **JUAN** Valdez asked **MUNIR** if he only wanted "white" and the **MUNIR** said yes and that he (**MUNIR**) called "the guy" (UTP) for the "brown." A short time later, **JUAN VALDEZ** received an incoming call from **MUNIR**. During the conversation, **MUNIR** told **JUAN** that "the guy wants six." **JUAN** Valdez asked **MUNIR** "the brown" and **MUNIR** told **JUAN**, "no the white." **MUNIR** told **JUAN** Valdez that the UTP asked if he (**JUAN** Valdez) could make it one bag.

178. In this conversation, "white" was a reference to cocaine and "brown" was a reference to heroin. It was clear that **MUNIR** was a lower level drug dealer ordering

cocaine from his supplier, **JUAN** Valdez. When he said he called "the guy" for "the brown" he was saying that he ordered heroin through someone else. **MUNIR** first arranged for the purchase of "4" of cocaine at noontime and then called back to increase the order to "6" for "the guy" (customer) who was requesting that it be packaged in one bag rather than multiple bags. I know that "6" referred to the quantity of cocaine but could not be sure, in context, whether that meant six grams or 60. Based on the nature and frequency of **MUNIR**'s orders, I believe that it was six grams.

179. Because **MUNIR** regularly ordered both heroin and cocaine, some of his calls were illustrative of the division of responsibilities between **JUAN** Valdez and **CLUADIO** Valdez. On February 24, 2017, **JUAN** Valdez spoke on Target Telephone III numerous times to **MUNIR** who was using cellular telephone number (508) 944-1089. During the first conversation, **MUNIR** told **JUAN** Valdez that, "My man is driving up right now, coming from Fall River for four ... he is on the highway coming to Providence." **JUAN** Valdez said, "Okay, give me 25 minutes." Following this initial conversation, **MUNIR** called **JUAN** Valdez back on Target Telephone III and clarified that he wanted "white." **JUAN** Valdez acknowledged, "white, yeah, white." During a later call, **JUAN** Valdez told **MUNIR** he thought **MUNIR** wanted "brown." **MUNIR** repeated, "No, I told you white, my Papa. I said white. I even told your brother yesterday ... I'm gonna need four white tomorrow." **JUAN** Valdez said he would call his brother to clarify. **JUAN** Valdez then used Target Telephone III to call his brother, **CLAUDIO** Valdez on telephone number (617) 586-6854. During the conversation,

JUAN Valdez said, "El Gringo" wanted "four of that."²⁰ CLAUDIO Valdez asked, "Of yours?" JUAN Valdez clarified, "from yours." CLAUDIO Valdez agreed to bring "it" to him. MUNIR called back again to tell JUAN Valdez that he now wanted "six white." JUAN Valdez agreed, "Okay." JUAN Valdez then immediately called CLAUDIO Valdez and informed him that he now wanted "six." A short time later, MUNIR was observed by surveillance officers parked on Ontario St. in Providence, RI. He was in his Toyota Tundra with RI Combination plate 118799 (the Tundra).²¹ CLAUDIO Valdez was observed as he walked to the vehicle and briefly met with MUNIR through the driver's side window of the Tundra. CLAUDIO Valdez then walked out of the area and the Tundra drove away.

180. I believe that when MUNIR initially ordered "white" from JUAN Valdez, MUNIR was using the drug code "white" to signify cocaine rather than heroin. JUAN Valdez misunderstood him to be ordering a variety of his heroin (e.g. "China white"). He explained to MUNIR that although he said "white" (cocaine) he thought MUNIR meant "brown" (heroin). MUNIR reminded JUAN Valdez that he said "white" and further offered that he had even told his brother (CLAUDIO Valdez) the previous day that he needed "four white." The conversation between JUAN and CLAUDIO Valdez that followed in which they referred to supplying the white "from yours" distinguished

²⁰ In other calls MUNIR was referred to as "Americano." I generally understood the Valdez brothers to use a nickname for him roughly translated, "The American." MUNIR's designation, be it "El Gringo" or "Americano" is significant because MUNIR does not appear to speak much Spanish and so more of the conversation was in English.

²¹ According RI DMV, the Tundra is registered to MUNIR and it has been observed to be parked at his residence.

between the “white” that was in **JUAN**’s possession (heroin) versus the “white” that was immediately available to **CLAUDIO** (cocaine). That suggested to me that there is a division of responsibility between the brothers based on the type of drug. I believe that although **CLAUDIO** Valdez is involved in all aspects of the VALDEZ DTO (for example he has delivered heroin ordered from **JUAN** Valdez), **CLAUDIO** is more responsible for the cocaine trade and **JUAN** Valdez primarily handles the heroin. That opinion was verified by the next call, in which **MUNIR** increased his order to “six,” and **JUAN** Valdez immediately relayed the change to his brother **CLAUDIO** Valdez. When **CLAUDIO** Valdez briefly met with **MUNIR** (“El Gringo”) on Ontario Street he supplied **MUNIR** with “it” which I understood to be six grams of cocaine.

181. On March 3, 2016, **JUAN** Valdez used Target Telephone III to communicate with **MUNIR** on telephone number (508) 944-1089 on numerous occasions. During the first conversation at approximately 9:27 a.m., **MUNIR** asked **JUAN** Valdez for “six white” and said he was going to bring them to a UTP and then return with the money. **MUNIR** said he was about three minutes away. Immediately after this conversation, **JUAN** Valdez called **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** told **CLAUDIO** that **MUNIR** was on his way and that he will be paying later. **CLAUDIO** indicated that he understood and said he would go meet **MUNIR** now.

182. At approximately 9:32 a.m., surveillance officers observed **MUNIR** park his Tundra on Ontario St. facing Niagara St. Approximately five minutes later, **CLAUDIO** Valdez parked the silver BMW wagon in the parking lot located at 861A

Broad St. **CLAUDIO** Valdez got out of the silver BMW and entered the Tundra. The Tundra drove around the block, making a left turn onto Niagara St., a left turn onto Lexington Ave. and pulled over to the side of the road. **CLAUDIO** Valdez got out of the Tundra and returned to the silver BMW. Both vehicles then departed the area.

183. Over the course of the next three hours, **MUNIR** and **JUAN** Valdez spoke multiple times to arrange payment for the narcotics he received earlier in the day from **CLAUDIO** Valdez. The two men agreed to meet at the "same place."

184. At approximately 1:12 p.m., surveillance officers saw **MUNIR** waiting in the Tundra on Ontario St. About one minute later, **JUAN** Valdez walked up to the passenger-side window of the Tundra and met with **MUNIR** for about 15 seconds. Following the brief transaction, **MUNIR** departed in the Tundra and **JUAN** Valdez was observed walking to the parking lot of 861A Broad St., entering the gray Infiniti, and departing the area.

185. Based on these conversations, I believe that **MUNIR** ordered six grams of cocaine that he was providing to a UTP drug customer. I believe that **JUAN** Valdez called **CLAUDIO** Valdez because investigation to date has shown that **CLAUDIO** Valdez is primarily responsible for distributing cocaine for the VALDEZ DTO. I also know that **CLAUDIO** Valdez and/or **JUAN** Valdez have regularly met with **MUNIR** multiple times per week in the vicinity of Ontario and Niagara St. in Providence, RI ("the same place") and I believe that **CLAUDIO** Valdez delivered the cocaine to him there again. I know based on my training that the men drove around the block as a counter-surveillance measure to see if anyone was trying to watch them. Finally, I

believe that **JUAN** Valdez gave **MUNIR** the drugs on consignment because **MUNIR** is a regular and trusted customer. **MUNIR** sold the drugs, kept his profit and met with **JUAN** Valdez later at the "same spot" to pay the money he owed for the drugs.

186. On March 6, 2017 at approximately 11:09 a.m., **JUAN** Valdez received an incoming call from **MUNIR** on Target Telephone III. **MUNIR** said, "Five white tomorrow." **MUNIR** also said he was going to call a UTP to see if he wanted "brown." The pair arranged to meet at 11:00 a.m.

187. On March 7, 2017 at approximately 9:08 a.m., **JUAN** Valdez received an incoming call on Target Telephone III from **MUNIR**. During the conversation, **MUNIR** said, "I've got a guy who wants three brown ... he wants six white and another guy wants three brown." **JUAN** Valdez responded, "Okay, I call my brother." Following this conversation, **JUAN** Valdez immediately called **CLAUDIO** Valdez on Target Telephone III. During the conversation, **JUAN** Valdez told him to see the "American" at 11:00 and "don't forget the six and he wants three from the brown one."

188. At approximately 11:04 a.m., surveillance officers saw **CLAUDIO** Valdez arrive at 861A Broad St. in the silver BMW. Approximately two minutes later, **MUNIR** drove the Tundra pass the silver BMW. The BMW pulled out of 861A Broad St. and followed the Tundra on Ontario St. and then to Niagara St., at which time surveillance was discontinued.

189. On March 8, 2017 at approximately 1:11 p.m., **JUAN** Valdez received an incoming phone call from **MUNIR**. During the conversation, **MUNIR** said a UTP

wanted six "white" in one bag so the UTP can "put some on it and make some money." The pair agreed to meet the following day at approximately 10:00 a.m.

190. On March 9, 2017 at approximately 9:57 a.m., **JUAN** Valdez received an incoming phone call from **MUNIR**. During the conversation, **MUNIR** said he was on his way over there. **JUAN** Valdez responded, "I'll call my brother." **JUAN** Valdez then immediately called **CLAUDIO** Valdez on Target Telephone III and said, "He is there." **CLAUDIO** Valdez responded, "I will go there in like two minutes."

191. At approximately 10:17 a.m., **JUAN** Valdez received another incoming phone call from **MUNIR**. During the conversation, **MUNIR** asked **JUAN** Valdez, "what's your problem with gringo ... your brother called me a gringo ... gringo seven." **JUAN** Valdez responded, "one for you." **MUNIR** said, "I know ... but who the fuck is gringo ... tell your brother I said, 'miricon'." The conversation ended with **JUAN** Valdez laughing.

192. In this instance, **MUNIR** was supplying a lower level drug dealer. He order for a UTP that wanted six "white" in one bag so the UTP could "put some on it and make some money." That meant **MUNIR**'s customer was buying a bulk amount to which he would add cut to increase his own profit. Although no surveillance was conducted, the content of the calls suggested to me that **CLAUDIO** Valdez did meet and supply the cocaine to **MUNIR** because **MUNIR** related his conversation with **CLAUDIO** to **JUAN**.

193. On March 12, 2017 at approximately 2:52 p.m., **JUAN** Valdez used Target Telephone III to call **CALUDIO** Valdez on Target Telephone IV. During the call, **JUAN**

Valdez told **CLAUDIO** Valdez, "The gringo ... of the same ... six ... and you give him one ... for tomorrow at 10:00 ... six all together and one for him, you understand?"

194. On March 13, 2017 at approximately 9:09 a.m., **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez reminded **CLAUDIO** Valdez about the "stuff" for the "gringo" (referring to **MUNIR**). **CLAUDIO** Valdez advised that he had remembered and said he was already in the area. At approximately 9:45 a.m., **PERDOMO** and **CLAUDIO** Valdez were observed walking from 88 Barrows St., Providence, RI and entering a black Jeep SUV (RI MV 571, Enterprise Rental Car, rented by **PERDOMO**). The Jeep was drove off with **PERDOMO** as the driver. At approximately 9:52 a.m., **CLAUDIO** Valdez used Target Telephone IV to call **MUNIR** on telephone number (508) 944-1089. During the conversation, they discussed a meeting location but had difficulty due to the language barrier as **MUNIR** only speaks English and **CLAUDIO** Valdez primarily speaks Spanish. **PERDOMO** got on the phone and interceded. She asked **MUNIR** where he was and if he knew how to get to the "fruit stand." **MUNIR** explained that he was still waiting for his guy but could get there in about 10 minutes. **PERDOMO** relayed the information to **CLAUDIO** Valdez and they all agreed to meet at the fruit stand.

195. Based on these conversations, I believe **MUNIR** ordered seven grams of cocaine from **JUAN** Valdez (six and one for him) on March 12, 2017 that **CLAUDIO** Valdez and **PERDOMO** delivered to **MUNIR** on March 13, 2017 at the fruit stand. I

believe it was cocaine because **MUNIR** purchased six of the “white” from **JUAN** Valdez on March 9, 2017 and on this occasion he ordered the “same.”

196. On March 16, 2017 at approximately 11:05 a.m., **JUAN** Valdez received an incoming call of Target Telephone III from **MUNIR**. During the conversation, **MUNIR** ordered “four brown and one white.” The men agreed to meet at approximately 12:30 p.m. Immediately after this call, **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez said “the gringo” called and wants four of his (Juan’s) and one of Claudio’s (4g heroin and 1g cocaine). At approximately 12:20 p.m., **MUNIR** called **JUAN** Valdez and said, “I got his money, I’m all set ... I’m ready.” **JUAN** Valdez responded, “Okay, I’ll call my brother.” At approximately 12:45 p.m., law enforcement observed **JUAN** Valdez and **CLAUDIO** Valdez arrive at the parking lot of America’s Food Basket, 863 Broad St. in a gray Nissan Altima (RI KE-239, Enterprise Rental Car). After he parked in the lot, **CLAUDIO** Valdez was observed getting out of the front passenger’s seat of the Altima and walking towards Ontario St. **JUAN** Valdez then drove the Altima out of the lot. At that same time, **MUNIR** was observed arriving on Niagara St. in his Tundra. He parked on the side of the road near Congress Ave. At approximately, 12:46 a.m., **MUNIR** called **JUAN** Valdez and said, “I’m at Juan Pablo.” **JUAN** Valdez replied, “My brother is over there.” At approximately 12:48 p.m., **CLAUDIO** Valdez was observed walking up to the Tundra and entering the front passenger seat of the vehicle. The Tundra then departed the area.

197. Based on these conversations and surveillance, I believe that **MUNIR** ordered four grams of heroin and one gram of cocaine from **JUAN** Valdez. I believe that **CLAUDIO** Valdez provided the narcotics to **MUNIR** and that the complex way they met was a further effort to defeat law enforcement surveillance.

198. On the same day, at approximately 1:05 p.m., **JUAN** Valdez received an incoming phone call on Target Telephone III from **MUNIR**. **MUNIR** said he needed "six white for tomorrow" and "one for me." The pair agreed to meet at 10:30 a.m. **JUAN** Valdez then immediately called **MUNIR** back and asked, "In one baggy?" **MUNIR** replied, "Yeah, it's the same guy."

199. On March 17, 2017 at approximately 10:03 a.m., **MUNIR** called **JUAN** Valdez on Target Telephone III. During the conversation, **MUNIR** said he would be ready for 10:30 a.m. **JUAN** Valdez told **MUNIR** to go see his brother now and he can pay later. Approximately one-minute later, surveillance officers saw **MUNIR** drive in his Tundra from the parking lot of the Lockwood Plaza Apartments, 50 Prairie Ave., Providence, RI to the vicinity of Niagara St. and Ontario St. Surveillance officers also observed **CLAUDIO** Valdez arrive on Niagara St., operating the white Volvo. The Tundra followed the Volvo to Emerson St., where both vehicles parked on the right side of Emerson Street. **CLAUDIO** Valdez got out of the Volvo and briefly met with **MUNIR** at the driver's side window of the Tundra after which **CLAUDIO** Valdez returned to the Volvo and both vehicles departed the area.

200. Based on these conversations and the surveillance, I believe that **MUNIR** ordered seven grams of cocaine from **JUAN** Valdez and that **CLAUDIO** Valdez delivered the cocaine to **MUNIR**.

201. On March 22, 2017, at approximately 10:13 a.m., **JUAN** Valdez placed an outgoing call from Target Telephone III to **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez informed **CLAUDIO** Valdez that the "white guy" called (referring to **MUNIR**). **CLAUDIO** Valdez said he would call **JUAN** Valdez on "the other." **CLAUDIO** Valdez then immediately called Target Telephone V from Target Telephone IV. During that conversation, **JUAN** Valdez told **CLAUDIO** Valdez that **MUNIR** needed "six" and "one for himself." I believe that during this conversation, **JUAN** Valdez informed **CLAUDIO** Valdez that **MUNIR** needed seven grams of cocaine.

John Doe, alias Jesus DELGADO-Sierra, aka Carlito, aka Carlos

202. **DELGADO** (DOB: 05/20/1980) is known to be a large-scale drug customer of **JUAN** Valdez. It is unknown if **DELGADO** is a U.S. Citizen but **DELGADO** is likely an alias. **DELGADO** resides at 119 Glendower Rd., Apartment 1B, Roslindale, MA. The U.S. District Court in Massachusetts issued a search warrant for **DELGADO**'s residence. **DELGADO** was photographed and identified through surveillance and a MA driver's license that was issued on May 7, 2013 bearing his photograph, and that name, with that date of birth. However, I believe **DELGADO** is actually a Dominican male that fraudulently obtained his MA driver's license using the alias of a Puerto Rican born male named Jesus Delgado-Sierra. I have obtained what

appears to be a valid Puerto Rican driver's license for an individual with the same name, date of birth and social security number. However, the license photograph depicts a different person. The individual on the Puerto Rican driver's license has a driving record dating back to at least 2004 and his most current Puerto Rican license was issued on October 5, 2015. For ease of reference I will simply refer to this target as **DELGADO**. **DELGADO** has been intercepted numerous times engaging in criminal conversations concerning the subject offenses. **JUAN** Valdez refers to **DELGADO** as "Carlos" or "Hombre" during the intercepted phone calls. **DELGADO** has the following criminal history:

- March 2015 – Distribution of Heroin (Arrested by the Boston PD, Disposition Unknown)

203. On March 1, 2017, at approximately 5:37 p.m., **JUAN** Valdez received a phone call on Target Telephone III from **DELGADO**. During the conversation, **DELGADO** said he was getting "dry" and needed the "brown." **JUAN** Valdez responded, "I will bring it tomorrow. What do you want me to bring tomorrow?" **DELGADO** answered that he need the brown and to bring the "3." **JUAN** Valdez said, I will bring you "300." He asked **DELGADO**, "And how much do you want from the hard one?" **DELGADO** responded, "30." Following this conversation, **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez told **CLAUDIO** Valdez that "Carlitos" needs "30 hard" for tomorrow. **CLAUDIO** Valdez said he would have "it" ready for tomorrow.

204. Based on the above conversations, I believe **DELGADO** called **JUAN** Valdez and ordered 300 grams of heroin (brown) and 30 grams of crack cocaine (hard). I believe that **JUAN** Valdez then called **CLAUDIO** Valdez so that **CLAUDIO** Valdez could prepare the 30 grams of crack cocaine for **DELGADO**. Based on what I have learned from the ongoing investigation, I believe that **CLAUDIO** Valdez is primarily responsible for the distribution of cocaine and crack cocaine for the Valdez DTO.

205. On March 2, 2017, at approximately 3:25 p.m., **JUAN** Valdez placed a call on Target Telephone III to **DELGADO**. During the conversation, **DELGADO** spoke to **JUAN** Valdez about an Unidentified Female (UF) that he supplies with narcotics. **DELGADO** said, "She paid me yesterday, 2500 ... she took a ton from this one ... she paid me 2,500 for material." Later during the conversation, **JUAN** Valdez said, "I'm going to bring you the 300." Following this conversation, **JUAN** Valdez received an incoming phone call on Target Telephone III from **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **CLAUDIO** asked **JAUN** Valdez if it was "30 pesos" that Carlitos wanted and **JUAN** Valdez confirmed that it was.

206. Based on my training and experience as well as my familiarity with this investigation, I understood that **DELGADO** has a UF customer that just paid him \$2,500 for narcotics and that **JUAN** Valdez confirmed he was going to bring **DELGADO** 300 grams of heroin. I also believe that **CLAUDIO** Valdez confirmed with **JUAN** Valdez that he was to prepare 30 grams of crack cocaine for **DELGADO**.

207. From approximately 6:46 p.m. to 7:46 p.m., **JUAN** Valdez was subject to surveillance while operating the white Altima from Providence, RI to his former

residence at 28 Zeller St., Roslindale, MA. While driving, at approximately 7:30 p.m., **JUAN** Valdez used Target Telephone III to call **DELGADO**. During the conversation, **JUAN** Valdez asked **DELGADO** where he was. **DELGADO** advised he would "be around" in about 20 minutes. At approximately 7:46 p.m., surveillance officers saw **DELGADO** arriving at 119 Glendower Rd., Roslindale, MA in a black Acura RDX (MA 2LE 322) and entering that residence. According to MA DMV records, the vehicle with that license plate is registered to **DELGADO** at 119 Glendower Road in Roslindale.

208. At approximately 8:27 p.m., **JUAN** Valdez used Target Telephone III to call **DELGADO**. During the conversation, **JUAN** Valdez asked **DELGADO**, "Are you there"? **DELGADO** confirmed that he was there and directed **JUAN** Valdez to "head over here." Immediately after this conversation, surveillance officers observed **JUAN** Valdez leave Zeller St. in the white Altima. At approximately 8:35 p.m., they saw **JUAN** Valdez park the white Altima on the street across from 119 Glendower Rd, leave the driver's seat of the vehicle, and enter 119 Glendower Rd. Approximately 15 minutes later, **JUAN** Valdez left the 119 Glendower Rd. residence, entered the driver's seat of the white Altima and departed the area.

209. Based on these phone conversations between **JUAN** Valdez and **DELGADO** and the corresponding surveillance, I believe **JUAN** Valdez delivered 300 grams of heroin and 30 grams of crack cocaine to **DELGADO** in his home at 119 Glendower Rd on March 2, 2017.

210. On March 16, 2017 at approximately 4:08 p.m., **JUAN** Valdez used Target Telephone III to place an outgoing call to **DELGADO** on telephone number (501) 422-

1808. **JUAN** Valdez asked **DELGADO** if he wanted anything. **DELGADO** said, "People got scared of that shit." **DELGADO** clarified that the "last one" was good but "the one before" that was not and people stopped calling him. **DELGADO** complained that "Preito" left with 600 pesos and turned off his phone. He now owes **DELGADO** money. **JUAN** Valdez said the "white" one that he had brought to **DELGADO** is the one that people did not like. **DELGADO** said people care more about the quality not the color. **JUAN** Valdez assured **DELGADO** that the "next one" is going to be very good. The men discussed the greater level of "competition" in Boston. **JUAN** Valdez said he has more customers in Boston than anywhere else.

211. In this conversation, I understood that **DELGADO** and **JUAN** Valdez were discussing how appearance and quality affected their heroin sales. **DELGADO** is **JUAN** Valdez's drug customer but he is also a drug dealer himself. **DELGADO** observed that his customers were frightened when the heroin is white and it effects sales. Heroin users are wary of heroin that is light in appearance because the heroin is thought to contain fentanyl (something that **JUAN** Valdez has assured others that he does not use in his heroin). **JUAN** Valdez told **DELGADO** that the next shipment of heroin will be of good quality. When **DELGADO** complained that, "Preito" left with 600 pesos and turned off his phone, I believe that he meant one of his customers took 600 grams of the heroin and has not paid for it.

212. On March 17, 2017 **JUAN** Valdez was intercepted in a number of calls about a drug deal with **DELGADO**:

- At approximately 6:47 p.m., **JUAN** Valdez received an incoming phone call on Target Telephone III from **DELGADO** on telephone number (617) 216-2792. During the conversation, **DELGADO** asked **JUAN** Valdez if he was “active” and **JUAN** Valdez answered affirmatively. **DELGADO** asserted, “Let’s do it.” **JUAN** Valdez asked **DELGADO** what he wanted and **DELGADO** said, “Two of the same and the other.” **JUAN** Valdez clarified, “You want 200 then? And how much of the other ... 30?” **DELGADO** confirmed that order. He said he would call **JUAN** Valdez from “the other phone right now” because he did not like talking “with this phone.”²²
- At approximately 7:03 p.m., **DELGADO** called **JUAN** Valdez on Target Telephone III from telephone number (617) 216-2792. During the conversation, **DELGADO** confirmed that he wanted “two of the same and the other.”
- At approximately 7:06 p.m., **JUAN** Valdez used Target Telephone III to place an outgoing call to **CLAUDIO** Valdez on Target Telephone IV. During the conversation, **JUAN** Valdez told **CLAUDIO** Valdez that “Carlitos” (**DELGADO**) wants “30 of the hard stuff.” The pair agreed to meet later so that **CLAUDIO** could bring “it” down.

213. At approximately 7:14 p.m., **JUAN** Valdez was observed arriving at the stash house at 103/105 Woodbine St., in the gray Nissan Altima and entering the residence. At approximately 7:31 p.m., **JUAN** Valdez received an incoming call from

²² Telephone number (617) 216-2792 is subscribed to Janelle Anderson (DOB: 07/22/1988), 75 Cobb St., Norton, MA. Anderson’s MA driver’s license, however, lists her current address as 119 Glendower Rd., Apt. 1B, Roslindale, MA.

RODRIGUEZ. During the conversation, **JUAN** Valdez told **RODRIGUEZ** that he was “working on something for Carlitos” and would call her later.

214. At approximately 9:10 p.m., **JUAN** Valdez placed an outgoing phone call to **CLAUDIO** Valdez. During the conversation, **JUAN** Valdez directed **CLAUDIO** Valdez to meet him at “Beatriz’s.” Approximately two minutes later, **JUAN** Valdez was observed leaving 103/105 Woodbine St. and entering the gray Altima. At approximately 9:23 p.m., **JUAN** Valdez was observed meeting with **CLAUDIO** Valdez in the parking lot of 861 Broad St., Providence, RI. **CLAUDIO** Valdez was operating the white Volvo. **JUAN** Valdez was then followed by surveillance to Glendower Rd. in Roslindale, Massachusetts. Before he arrived there, however, at approximately 10:26 p.m., **DELGADO** was observed leaving the side entrance of 119 Glendower Rd. He entered a black Acura registered to him that was parked in the driveway and drove off. About two minutes later, **JUAN** Valdez parked the gray Altima in front of 119 Glendower Rd.

215. At approximately 10:31 p.m., **JUAN** Valdez placed an outgoing call to **DELGADO** on telephone number (617) 216-2792. He asked **DELGADO** where he was. **DELGADO** said he left there five minutes ago. **JUAN** Valdez said he was there and asked **DELGADO** to come back. At approximately 10:49 p.m., the black Acura RDX parked in the driveway of 119 Glendower Rd. **DELGADO**, got out of the black Acura and entered the side door of 119 Glendower Rd. **JUAN** Valdez then left the gray Altima and entered the front door of 119 Glendower Rd. At approximately 11:13 p.m., **JUAN**

Valdez left 119 Glendower Rd., entered the gray Altima and departed the area. The black RDX remained in the driveway of 119 Glendower Rd.

216. Based on these conversations and surveillance, I believe that **DELGADO** ordered 200 grams of heroin and 30 grams of crack cocaine from **JUAN** Valdez. **JUAN** Valdez prepared the heroin inside 103/105 Woodbine St. where it was stored. He arranged to get the crack cocaine from his brother **CLAUDIO** who is more directly responsible for cocaine. They met at 861 Broad St., where **CLAUDIO** Valdez provided **JUAN** Valdez with the 30 grams of crack cocaine and **JUAN** Valdez then delivered the heroin and crack cocaine to **DELGADO** at 119 Glendower Rd. on March 17, 2017.

217. On April 1, 2017, at approximately 12:08 p.m., **JUAN** Valdez used Target Telephone V to call **DELGADO** on telephone number (617) 216-2792. During the conversation, **JUAN** Valdez asked "Do you want anything for today?" **DELGADO** said if it was from the "same one" then yes because he "gave stuff to a man and he called back and told me the stuff was good." **JUAN** Valdez assured **DELGADO** that it was the same stuff and that it would be "decorated" the same way. The pair discussed how people in the "street" that use the "stuff" know if it is different or has been changed. **DELGADO** warned that if the stuff arrives "weak ... people run away." **DELGADO** said "this one from now was done good" and that he gave some of it to the guy that comes from New Hampshire. **DELGADO** said he still had "one left" but he wanted "two pesos." **DELGADO** clarified, "If it is from the same one then bring the two." **JUAN** Valdez agreed to bring **DEGLADO** two pesos later that day.

218. Over the course of the afternoon, **JUAN** Valdez and **DELGADO** spoke several more times.

- At approximately 3:17 p.m., **JUAN** Valdez called **DELGADO** and asked him if he was home. **JUAN** Valdez said he was about 30 minutes away. **DELGADO** said he was in Revere, MA.
- At approximately 4:13 p.m., **JUAN** Valdez called **DELGADO** and said he had been waiting at **DELGADO**'s house for about 15 minutes. **DELGADO** explained that he was there, inside his house. **JUAN** Valdez jokingly said he must have fallen asleep and said he would see **DELGADO** now.
- At that time, the GPS signal from Target Telephone V was in close proximity to 119 Glendower Rd., Roslindale, MA.
- At approximately 5:37 p.m., **JUAN** Valdez called **DELGADO** and said they are on "9400 ... 9400 is what I have here." **DELGADO** confirmed and said "94 is what we are on."

219. Based on these conversations and my experience, I believe that **DELGADO** was satisfied with the quality of heroin that **JUAN** Valdez last provided him. When **DELGADO** said he had "1" or "1 peso" left he was saying that he had 100 grams of the last delivery left but that if the quality was the same he would take "2 pesos" meaning 200 grams. I understood that when **JUAN** Valdez promised **DELGADO** that he would supply him with heroin that was "decorated" the same way he meant that the heroin would be of the same quality, strength cut and color. I believe **JUAN** Valdez called **DELGADO** later that evening to confirm that **DELGADO** now owed him \$9,400 for heroin that **JUAN** Valdez has provided him. Based on the conversations coupled with the GPS data that **JUAN** Valdez delivered the heroin to

DELGADO at 119 Glendower Rd., Roslindale, MA at approximately 4:13 p.m on April 1, 2017.

220. **DELGADO** is currently on state probation stemming from his 2015 arrest for heroin distribution. He listed his address with the probation office at 119 Glendower Rd., Apt. 1B, Roslindale, MA. He listed his contact number as (617) 216-2792. That is the same number subscribed to Janelle Anderson at the same address and the phone that he told **JUAN** Valdez he does not like to use for their drug related conversations.

Agustin LEONARDO Jr.

221. **LEONARDO** (DOB: 09/14/1992) lists his address as 92 Crescent St., Apt. 1, Providence, RI on his RI Driver's License. However, physical surveillance and phone records has established that he resides at 139 Atlantic Ave., Providence, RI, for which a warrant is being sought.²³ **LEONARDO** is most likely from the Dominican Republic. His citizenship is not known. **LEONARDO** has been intercepted numerous times engaged in criminal conversations concerning the subject offenses and, in that way, is known to be a drug customer of **JUAN** Valdez. **LEONARDO** has no known criminal history.

²³ On March 22, 2016, at approximately 5:16 p.m., law enforcement established surveillance on 139 Atlantic Ave., Providence, RI. At the onset of surveillance, **LEONARDO**'s green Acura MDX (RI 464-278) was observed parked in the driveway of 139 Atlantic Ave. At approximately 5:22 p.m., **LEONARDO** was observed leaving 139 Atlantic Ave., entering the driver's seat of the green MDX and departing the area. At approximately 5:50 p.m., **LEONARDO** was observed returning to 139 Atlantic Ave. in the MDX and entering the front door of 139 Atlantic Ave. using a key. **LEONARDO** is known to use cellular telephone number (401) 660-7457. Cellular telephone number (401) 660-7457 is subscribed to Junior Leonardo, 139 Atlantic Ave., Providence, RI.

222. On February 18, 2017, JUAN Valdez, using Target Telephone III, had several conversations with LEONARDO using 401-660-7457. During the conversations, JUAN Valdez asked LEONARDO if he had "anything" yet. LEONARDO said that "he," an Unknown Third Party (UTP), has not called yet. LEONARDO said he called the UTP but he did not pick up the phone. During a later conversation, LEONARDO told JUAN Valdez that the UTP just called him and told him to hold on until next week. The UTP reportedly said that he has "25,000 there" and that he is "collecting money." JUAN Valdez told LEONARDO that the UTP was getting "it" from somebody else. LEONARDO countered that the UTP is not getting it from anybody else, and on other occasions "that" has lasted the UTP for "a month and change."

223. I believe that, in this conversation, "anything" was a reference to a drug debt being collected for JUAN Valdez by LEONARDO from a UTP. LEONARDO said that the UTP drug customer/dealer reported that he had collected \$25,000, was still collecting money, and would not need additional narcotics ("it" or "that") until next week. JUAN Valdez suspected that the UTP was getting his drugs from another supplier because it had been so long since the last time he supplied the UTP with narcotics. In response, LEONARDO cautioned JUAN Valdez that sometimes it takes the UTP a month or more to sell-off his customary drug order.

224. On March 13, 2017 there were a series of telephone calls involving a drug sale to LEONARDO:

- At approximately 8:58 a.m., **JUAN** Valdez received a phone call on Target Telephone III from **LEONARDO** on telephone number (401) 660-7457.²⁴ During the conversation, **LEONARDO** told **JUAN** Valdez that an Unidentified Third Party (UTP) was “ready,” so **JUAN** Valdez could bring “that” whenever he wanted. **JUAN** Valdez said it was better today than tomorrow because of a pending snowstorm. **JUAN** Valdez warned, “I’m not ready right now ... I’m going to call you because I have to prepare it.” **LEONARDO** asked **JUAN** Valdez if he was still going to be able to bring “that” today and **JUAN** Valdez confirmed he could. **LEONARDO** asked if the “shit” was going to come the same way as the one that just “moved” and said that “it” was gone in about 20 days. **LEONARDO** also told **JUAN** Valdez that the UTP said “it” was good. **JUAN** Valdez assured **LEONARDO** that “it” was going to be the same.
- At approximately 9:34 a.m., **JUAN** Valdez received another incoming call on Target Telephone III from **LEONARDO**. During the conversation, **LEONARDO** said he was calling to tell him to add “5 little things to the 15 ... instead of 15 ... 20.” **JUAN** Valdez asked why, and **LEONARDO** assured him that he was going to pay for the extra “5.” **JUAN** Valdez responded, “Alright ... okay.”
- At approximately 10:10 a.m., **JUAN** Valdez was observed arriving on Woodbine St. in Cranston, RI in a gray Nissan Altima (RI KE 239, Enterprise Rental Car). He parked across the street from 103/105 Woodbine St. **JUAN** Valdez entered the stash house at 103/105 Woodbine St. He spent a little

²⁴That telephone number is subscribed to in the name Junior Leonardo, at 139 Atlantic Ave., Providence, RI. A green Acura MDX (RI 464 278) has been observed in the driveway of 139 Atlantic Ave. on an almost daily basis since the onset of this investigation. According to police records, **Leonardo** was given a citation by the Cranston Police Department on February 25, 2017 while operating the Acura MDX. The citation was for Operation of Unregistered Motor Vehicle.

over three hours there and left at approximately 2:20 p.m. carrying two plastic bags. He drove away in the gray Altima in the direction of Atlantic Ave. Nine minutes later, at approximately 2:29 p.m., the gray Altima was observed parked directly in front of 139 Atlantic Ave. The green Acura MDX remained parked in the driveway of 139 Atlantic Ave. **JUAN** Valdez only stayed briefly and, at 2:31 p.m., left 139 Atlantic Ave. in the gray Altima. The Acura MDX remained in the driveway of 139 Atlantic Ave.

225. On March 15, 2017 **JUAN** Valdez again participated in several phone conversations on Target Telephone III with **LEONARDO**. During the first conversation, **LEONARDO** asked **JUAN** Valdez if he was “there” and **JUAN** Valdez said he was not. The pair agreed to talk later.

- At approximately 10:48 a.m., **JUAN** Valdez placed a call to **LEONARDO**. During the conversation, **LEONARDO** said, “Don’t come now ... this girl is here and I don’t want her to see you. When you come this way, you call me.” **JUAN** Valdez responded, “It is you who needs to call me.” The pair again agreed to talk later.
- At approximately 11:31 a.m., **LEONARDO** called **JUAN** Valdez and said the girl was about to leave in her black car. **JUAN** Valdez assured him, “Okay, if I see a black car I will not stop.”
- At approximately 11:38 a.m., **LEONARDO** called **JUAN** Valdez and told him that the girl left and directed him to come in through the back. At approximately 11:43 a.m., a surveillance unit observed the gray Nissan Altima parked directly in front of 139 Atlantic Ave. It was unoccupied. The Acura MDX was parked in the driveway of 139 Atlantic Ave. At

approximately 12:13 p.m., **JUAN** Valdez was observed walking from the rear of 139 Atlantic Ave., entering the gray Altima and departing the area.

- Almost immediately, **LEONARDO** called **JUAN** Valdez. During the conversation, **LEONARDO** asked **JUAN** Valdez "Did you see the black SUV stopped there ... on the other street?" **JUAN** Valdez said he did not see it. **LEONARDO** said it "was right there when you got out ... when you moved ... got in ... the SUV moved ... when you got out I started looking around ... and I saw it when you got out."

226. A law enforcement officer was conducting surveillance on 139 Atlantic Ave. in a dark-colored SUV at the time **LEONARDO** called **JUAN** Valdez and warned him of the suspicious vehicle. Therefore, **LEONARDO** was conducting counter-surveillance out of a window as **JUAN** Valdez departed his residence on March 15, 2017 and noticed law enforcement follow **JUAN** Valdez out of the area.

227. On April 5, 2017 at approximately 12:56 p.m., **JUAN** Valdez used Target Telephone V to call **LEONARDO** on (401) 744-3573. During the conversation, **JUAN** Valdez said he was just calling **LEONARDO** and he was not answering. **JUAN** Valdez has just called **LEONARDO**'s number ending in 7457. **LEONARDO** said his "other phone" was turned off and in his pocket. **LEONARDO** then told **JUAN** Valdez that he called the UTP yesterday and that "the thing" is "supposedly good" but "things are slow", however, the UTP is "finishing."

228. On April 9, 2017 at approximately 6:20 p.m., **LEONARDO**, used telephone number (401) 660-7457 to call **JUAN** Valdez on Target Telephone V. **LEONARDO** brokered a drug deal for an Unidentified Third Party (UTP).

LEONARDO informed **JUAN** Valdez that the UTP called him to request "that" for tomorrow. **LEONARDO** explained that typically, when the UTP called, it was because he was "finished" or had "very little left." **JUAN** Valdez asked **LEONARDO** to tell the UTP to give more notice next time because he (**JUAN** Valdez) does not like to "rush his work." **LEONARDO** asked **JUAN** Valdez to "make it tomorrow at your place because he told me that he is going to call me tomorrow." **JUAN** Valdez complained about how bad business had been. He blamed the current President of the United States for the decline. **LEONARDO** speculated that things will eventually get more "relaxed" and people will be "crossing faster." The conversation turned to life in the Dominican Republic. **JUAN** said that he wants to "retire" there. **LEONARDO** agreed and suggested "they" can hang out together in the "Capital" (Santo Domingo). At the end of the conversation **LEONARDO** said "Eduardo, Eduardo, of the 15, add five more ... bring me 20." **JUAN** Valdez acknowledged the change in order.

229. Based on these conversations, I believe that that **LEONARDO** was brokering a drug deal for a UTP drug dealer that he supplies. I believe **LEONARDO** called **JUAN** Valdez and told him to prepare the narcotics for tomorrow. I also believe that **LEONARDO** ordered an additional 20 grams of heroin to be delivered on April 10, 2017. I also believe **LEONARDO** is from the Dominican Republic.

230. Based on the results of this investigation, these conversations and other intercepted conversations as well as the surveillance conducted on these deliveries to **LEONARDO** at his residence, I believe that **LEONARDO** actively conducts heroin

trafficking activity at his residence located at 139 Atlantic Ave., Providence RI, where evidence of these crimes will be found.

John Doe, alias JOVAN

231. **JOVAN** is a name used by one of the larger drug customers of the VALDEZ DTO. His true identity is not known. Officers conducting surveillance at **JOVAN**'s residence, which is located at 195 Hamilton St. in Dorchester Massachusetts, have observed and photographed him there.²⁵ **JOVAN** is a drug dealer who uses the VALDEZ DTO as a source of supply. The U.S. District Court in Massachusetts issued a search warrant for **JOVAN**'s residence.

232. On February 25, 2017, **JUAN** Valdez had a series of conversations on Target Telephone III about a drug delivery to **JOVAN**. At approximately 11:51 a.m., **JUAN** Valdez received an incoming call on Target Telephone III from a UM on telephone number (857) 544-3947. **JUAN** Valdez referred to the UM as "**JOVAN**." During the conversation, **JOVAN** asked **JUAN** Valdez what was the earliest he could see him because he was "ready." **JUAN** Valdez asked **JOVAN** what he wanted. **JOVAN** responded, "Bring me the same, bring me one and you put in half ... the sooner you can the better." **JUAN** confirmed the order. He cautioned, "Alright, no more talking." The call ended.

²⁵ **JOVAN** was physically identified on March 21, 2017. While conducting surveillance on 195 Hamilton St., Dorchester, MA, at approximately 10:49 a.m., officers observed a middle-aged Hispanic male with black hair, black glasses and a black jacket, leave 195 Hamilton Street.

233. At approximately 11:59 a.m., **JUAN** Valdez placed an outgoing call on Target Telephone III to the telephone number used by **JOVAN**. During the conversation, **JUAN** Valdez told **JOVAN** that, in order to be quicker, "I'm going to send you the woman later." **JOVAN** agreed, "No problem." He also said, "Look ... I owe you 87 and a half ... I'm going to send you eight sticks." **JUAN** Valdez told **JOVAN** not to send "that" with "her." **JUAN** Valdez indicated that he would personally get that from him later. **JUAN** Valdez said that he would instruct "her" that, "You don't need to send anything."

234. At approximately 2:06 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from **CLAUDIO** Valdez. During the conversation, **CLAUDIO** Valdez asked **JUAN** Valdez to have "him" (referring to **JOVAN**) send his address so that "she can take it right there."

235. Immediately after this phone call, **JUAN** Valdez used Target Telephone III to call **JOVAN**. During the brief conversation, **JUAN** Valdez asked **JOVAN** to "send me the address there." Shortly after hanging-up, **JUAN** Valdez received an incoming text message on Target Telephone III from the number used by **JOVAN**. The content of the text message was not captured, because the court order was limited to the interception of wire communications.

236. Over the course of the next couple of hours, **JUAN** and **CLAUDIO** Valdez spoke multiple times about the logistics surrounding **CROTEAU**'s (the woman) delivery to **JOVAN**. At approximately 4:30 p.m., **JUAN** Valdez called **CLAUDIO** Valdez. During the conversation, **JUAN** Valdez asked if "she" arrived yet. **CLAUDIO**

Valdez told **JUAN** Valdez that “she” had called and that “she” was about six minutes away. **JUAN** Valdez told **CLAUDIO** to tell him when “she” (**CROTEAU**) gets there so “he” (**JOVAN**) “comes down to look for her.” **CLAUDIO** Valdez said he would call **JUAN** Valdez when she was there.

237. Immediately after that call, **JUAN** Valdez used Target Telephone III to call **JOVAN**. During the conversation, **JUAN** Valdez told **JOVAN**, “The woman is almost there ... she is in a white car that has plates from there.”²⁶

238. At approximately 4:33 p.m., **JUAN** Valdez received an incoming call from **CLAUDIO** Valdez. During the conversation, **CLAUDIO** Valdez said, “she is there ... call him.” **JUAN** Valdez affirmed, “Alright, I am going to call him.” **JUAN** Valdez then immediately called **JOVAN** and said “she” was there. **JUAN** Valdez further described her as “one woman in a white car” and said that she had her hair up and was “the same one that went before.” **JUAN** Valdez further described the car as a Nissan. The call ended with **JOVAN** saying that he saw her.

239. Over the course of the next couple of hours, **JUAN** Valdez used Target Telephone III to speak to **CLAUDIO** Valdez and **RODRIGUEZ** on multiple occasions. During the conversations, **JUAN** Valdez spoke about waiting for “the girl” to return with the car. Surveillance officers had observed **JUAN** Valdez arrive in Cranston during the morning of February 25, 2017 driving the white Altima that **CROTEAU** used

²⁶ The car, a white Nissan Altima, that was being driven (and rented) by **CROTEAU**, has Massachusetts license plates. **JOVAN** lives in Massachusetts (“plates from there”).

to deliver heroin to **JOVAN**. **JUAN** Valdez needed the white Altima returned so he could drive home to **RODRIGUEZ** in Roslindale, Massachusetts (where they live).

240. At approximately 6:45 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from **RODRIGUEZ**. During the conversation, **JUAN** Valdez said he planned to go to **JOVAN**'s house to get some money before coming home but now it was too late. **JUAN** Valdez explained that he did not want "Tanya" to bring "that" because she is "too nervous" and that she appeared to be "high." **CROTEAU**'s first name is Tanya.

241. Based on these conversations, my training, and my experience in this investigation, I believe that **JUAN** and **CLAUDIO** Valdez sent **CROTEAU** to deliver 150 grams of heroin ("one and a half") to **JOVAN**. **CROTEAU** is **CLAUDIO**'s principle drug runner and delivery to **JOVAN** is consistent with her role. **CROTEAU** was renting (from Hertz) a white Nissan Altima with Massachusetts license plates (MA 3RV 856) that **JUAN** Valdez has also been seen driving on many occasions. Therefore, I also believe that **CROTEAU** made a previous delivery to the same customer, **JOVAN** ("the same one that went before"). Finally, it was clear from the conversation with **RODRIGUEZ** that **JUAN** fully intended to bring the drug money back to their home that evening. Only the lateness of the hour prevented him from doing it that day.

242. On February 26, 2017 **JUAN** Valdez used Target Telephone III to communicate with **JOVAN** multiple times about receiving the money he was owed.

243. At approximately 1:21 p.m., **JUAN** Valdez placed an outgoing phone call to **JOVAN**. During the conversation, **JUAN** asked **JOVAN** if he "was there." **JOVAN** said he was "not there" but asked **JUAN** Valdez to go there and speak with his wife.

244. At approximately 1:27 p.m., **JUAN** Valdez received an incoming phone call on Target Telephone III from **JOVAN**. During the conversation, **JOVAN** told **JUAN** Valdez that the address he previously sent was incorrect. **JOVAN** said the correct address was "195." **JUAN** Valdez said he knew what the address was and that he would see the **JOVAN** shortly. **JUAN** Valdez informed **JOVAN** that he "erases" information and prefers to ask instead of keeping it on his phone.

245. At approximately 1:40 p.m., **JUAN** Valdez placed another outgoing call to **JOVAN**. During the conversation, **JUAN** Valdez said he was "outside." According to GPS data, at the time of this phone conversation, Target Telephone III was located near 195 Hamilton St., Dorchester, MA.

246. At approximately 2:23 p.m., **JUAN** Valdez placed another outgoing call to **JOVAN**. During the conversation, **JUAN** Valdez asked how much it was that **JOVAN** left there. **JOVAN** replied, "8." **JUAN** Valdez asked how much of that was part of the "old debt" and **JOVAN** said, "7.5." **JOVAN** asked if the current balance is now at "7.5" and **JUAN** Valdez confirmed that it was.

247. Based on these conversations coupled with the GPS data, I believe that **JUAN** Valdez went to 195 Hamilton St. to collect money from **JOVAN** for drugs delivered in the past and a partial payment towards the drugs delivered by **CROTEAU**

the previous day. **JUAN** Valdez received \$8,000 ("8") from **JOVAN**'s wife at their home and that **JOVAN** currently owes **JUAN** Valdez \$7,500 ("7.5").

248. On March 7, 2017 at approximately 10:02 a.m., **JUAN** Valdez used Target Telephone III to place an outgoing call to **JOVAN**. During the conversation, **JOVAN** asked **JUAN** Valdez if he gets "five ... how much can I do?" **JUAN** Valdez explained that he had given him "stuff" at an "eight" and that **JOVAN** said it was good. **JOVAN** asked **JUAN** Valdez how much he (**JOVAN**) can add and still leave it at a "four or five." **JUAN** told **JOVAN** he could add "one and a half" however, everyone adds different amounts based on their people (customers). **JOVAN** then asked **JUAN** Valdez to bring him "ten" when he stops by to collect his money. **JOVAN** said he will use that 10 to "test it" and give out "samples." **JOVAN** said he wants to see if he can add "three" to those ten. **JOVAN** said he was going to put it out on the "streets" and see if it works with a "three." **JOVAN** explained that if it works he would grab, "half a chicken." **JOVAN** said he has two Unidentified Third Parties (UTPs) that want to "grab stuff" and **JOVAN** wants to see if he can get them to take "100 or 200." **JOVAN** again requested that **JUAN** Valdez come get his "papers" and bring 10. **JOVAN** later clarified that **JUAN** Valdez can bring the "100" and add "50," like he "always" requests, in addition to bringing the sample of "10." **JUAN** Valdez said he would bring it tomorrow because he was busy. **JOVAN** agreed, explaining that he still had about "30" left. The pair then discussed prices. **JUAN** Valdez said "I have people that I give it to at

80 ... some people at 75 ... I give it to Mello at 75, I only lowered it to you."²⁷ JOVAN said he was talking to a UTP who gets it at "65." JUAN Valdez retorted, "They grab it at 65 but they give him trash ... I have some people in Providence that I know ... do you know what happens? I give it to a guy and the guy puts it at 60 and they say, 'No, you have the stuff at a very expensive price, I grab it from a guy at 60.'" JUAN Valdez explained that they do not know they are "Grabbing my stuff ... and, since it's their people, I can't tell them that it's me who gives it to him. I just remain quiet." JOVAN said that no one considers "quality."

249. In this conversation, I believe JUAN Valdez and JOVAN discussed quantities of heroin in hundreds of grams (e.g. "100," "200," etc.) and the quality of heroin at various prices per gram (e.g. "80," "75," "65," "60," etc.) During the first part of the conversation, I believe JOVAN was asking JUAN Valdez how much he (JOVAN) can cut or add to the heroin that JUAN Valdez is providing him. JUAN Valdez said he provides JOVAN with high quality heroin, that he rated at being an "8" on a ten-point scale. JOVAN wanted JUAN Valdez to provide him with high quality heroin to which he can "add three." For example, JOVAN wanted a 10-gram heroin sample that he can add three grams of cut to and still have the quality of the heroin that would be rated at about a five on a ten-point scale. JOVAN requested 100 grams of high quality heroin that JUAN Valdez adds 50 grams of cut to, thus making 150 grams of heroin. However, if JOVAN's customers like the samples he provided, he is going to get "half a chicken."

²⁷ "Mello" is another larger drug dealer like JOVAN who uses the VALDEZ DTO as a source of supply. Mello, however, has not yet been identified.

Based on my experience, I know that a "bird" or "chicken" is commonly used in the drug trade to mean a kilogram of narcotics. Therefore half a chicken would be 500 grams. The pair then discussed the price per gram of heroin. **JUAN** Valdez explained that he sells heroin to some people at \$80 per gram, others at \$75 per gram and that he only lowered the price for **JOVAN**.

250. On March 8, 2017, **JUAN** Valdez used Target Telephone III, to arrange the delivery of the sample to **JOVAN** that they discussed a day earlier.

251. At approximately 12:34 p.m., **JUAN** Valdez placed a call to **JOVAN**. During the conversation, **JOVAN** asked for the "10 to test" and **JUAN** Valdez asked if **JOVAN** wanted the "other" as well. **JOVAN** said he does want "it" but not right now because if the "new one" works he is going to ask for "half." The conversation ended with **JUAN** Valdez telling **JOVAN** that he will call **JOVAN** prior to arriving.

252. Later that afternoon, at approximately 5:15 p.m., **JUAN** Valdez was observed leaving 103/105 Woodbine St. where he stores drugs and cash and entering the Chevy Silverado (RI 115201). He was followed by surveillance onto Interstate 95 North.

253. At approximately 6:10 p.m., **JUAN** Valdez used target Telephone III to call **JOVAN**. During the conversation, **JUAN** Valdez asked **JOVAN** if he was home because he was "on his way." **JOVAN** said he was, however, there was a "Justice of the Peace" at his house that was doing the "ceremony." **JOVAN** explained, "It's not good for her to see ... that we'll be talking about other things. Maybe they don't care. But it doesn't look good." **JOVAN** said **JUAN** Valdez could come inside and just wait until

the Justice of the Peace is done and then they can "do it." **JUAN** Valdez said he would call **JOVAN** when he was outside.

254. At approximately 6:32 p.m., **JUAN** Valdez received a phone call from **JOVAN**. During the conversation, **JOVAN** said the Justice of the Peace had already "signed" and had left. **JUAN** Valdez said he was in route and that he was stuck in traffic.

255. At approximately 7:04 p.m., **JUAN** Valdez called **JOVAN** and told him he was outside. Approximately four minutes later, law enforcement surveillance arrived at 195 Hamilton St., Dorchester, MA and observed the Chevy Silverado parked in front of that address. It was unoccupied. At approximately 7:24 p.m., **JUAN** Valdez was seen leaving 195 Hamilton St., entering the Chevy Silverado and departing the area. At approximately, 8:14 p.m., the Chevy Silverado was observed parked, unoccupied in front of **JUAN** Valdez's home at 24 Aberdeen Rd., Milton, MA.

256. I believe that in these conversations **JOVAN** asked **JUAN** Valdez to deliver a sample of the better quality heroin ("10 to test"). He declined to take more of the "other" but confirmed that if he (**JOVAN**) was satisfied with the quality of the sample ("new one") he would order a half a kilogram of heroin. While I do not know why there was a "Justice of the Peace" at **JOVAN**'s residence, the two men appeared to be wary of conducting a drug deal in front of that official.

257. On March 29, 2017 at approximately 1:16 p.m., **JUAN** Valdez received an incoming call on Target Telephone V from **JOVAN**. During the conversation, **JOVAN** said to **JUAN** Valdez "I want you to come by here today, but try to bring me something

good buddy, because the last two rounds have not been good for me." **JUAN** Valdez expressed dismay and asked "How is that possible ... how can that be?" **JOVAN** explained "I am just adding two but sometimes I have to bring it down to one ... one and a half ... lately they have complained. The guy who I give to ... 20 that I bring him three times per week, I've had to lower to 50 pesos." **JUAN** Valdez responded by saying that nobody else has complained about that "stuff" and then asked **JOVAN** how much he wanted. **JOVAN** replied, "one stick and add half." **JUAN** Valdez confirmed "100" and **JOVAN** replied "yes." **JUAN** Valdez then said he would call **JOVAN** back shortly.

258. At approximately 1:23 p.m., **JUAN** Valdez called **JOVAN** and the pair continued to discuss the quality of the "stuff." **JOVAN** further explained that he has two different people that like different "things." "One I give five for 400 adding one ... and lately he was telling me to check it because it was weaker." **JUAN** Valdez replied, "I always do "it" the same way and that doesn't go down or anything ... I have another one there, I'm going to try and give you another one." **JOVAN** agreed that he wanted a different one and **JUAN** Valdez assured him not to worry because, "I always have different ones and I'll give you something different to see." **JOVAN** asked if **JUAN** Valdez could do it later today and suggested that he just send "the girl." **JUAN** Valdez told **JOVAN** not to worry and said he would "send her over there."

259. At approximately 1:45 p.m., **CLAUDIO** Valdez used Target Telephone IV to call **CROTEAU**. During the conversation, he asked **CROTEAU** if she would go to

Boston that afternoon to visit his "friend." **CROTEAU** agreed to make the trip and the pair agreed to meet at 34 Burnside Ave.

260. At approximately 2:20 p.m., surveillance observed **CLAUDIO** Valdez arrive at 34 Burnside in the white Volvo. At approximately 3:02 p.m., **CROTEAU** arrived at 34 Burnside Ave. in the silver BMW. At about 4:13 p.m., **CLAUDIO** Valdez and **CROTEAU** left 34 Burnside Ave. together in the white Volvo. They were continuously watched to Noyes Ave. in Providence, RI, where they parked next to **JUAN** Valdez who was in a gray Nissan Altima rental (RI NF-682). **JUAN** Valdez was observed departing 103/105 Woodbine Ave. moments earlier and was watched as he went to Noyes Ave. **JUAN** Valdez, **CLAUDIO** Valdez and **CROTEAU** all met alongside the vehicle and then **CROTEAU** departed the area alone in the white Volvo.

261. Surveillance followed **CROTEAU** to 195 Hamilton St. in Dorchester, MA. While in route, **CROTEAU** called **CLAUDIO** Valdez and kept him updated on her estimated time of arrival. **JUAN** Valdez would then call **JOVAN** and relay the messages. For example, at approximately 6:02 p.m., **JUAN** Valdez called **JOVAN** and said, "She will be there in about 10 minutes so don't go out ... the girl will be there in about 10 minutes ... when she is there I will call you."

262. At approximately 6:21 p.m., law enforcement officers observed **CROTEAU** as she arrived on Hamilton St. and stopped in front of 195 Hamilton St. She was observed talking on the phone with **CLAUDIO** Valdez, informing him that she had arrived. Moments later, **JOVAN** walked out of 195 Hamilton St. while still on the phone with **JUAN** Valdez. During the on-going conversation, **JOVAN** confirmed she

was in the "white Volvo" and directed **JUAN** Valdez to tell her to drive further up the street. **JUAN** Valdez expressed his frustration and said, "Damn, this American is a mess." Commiserating that she makes things more "complicated" and it is not "safe." **JUAN** Valdez then said he was going to "tell her to get out of the car and head over to the house." **CLAUDIO** Valdez, who remained on the phone with **CROTEAU**, relayed the message. **CROTEAU** parked in front of 205 Hamilton St. and walked to the porch of 195 Hamilton St., where she was greeted by **JOVAN**. **JOVAN** and **CROTEAU** entered 195 Hamilton St. After approximately 10 minutes, **CROTEAU** left 195 Hamilton St., returned to the Volvo and departed the area. Shortly after departing the area, **CROTEAU** called **CLAUDIO** Valdez and said the guy gave her "3,500" and that she would be home in 45 minutes to an hour. At approximately 7:44 p.m., **CROTEAU** again called **CLAUDIO** Valdez. During the conversation, she asked "do you want me to bring up the money ... you want me to bring it to my house, upstairs?" **CLAUDIO** Valdez said "yes." **CROTEAU** said she would be home in about one minute. Moments later, law enforcement observed **CROTEAU** arrive at 34 Burnside Ave. in the white Volvo.

263. Based on these conversations and surveillance, I believe that **JOVAN** ordered 100 grams of heroin and asked **JUAN** Valdez to make sure the heroin was of good quality because he (**JOVAN**) had received some complaints. **JUAN** Valdez was surprised people were complaining but nevertheless, told **JOVAN** he would provide him with different heroin (stuff) this time. **JUAN** Valdez told **JOVAN** he would have **CROTEAU** (the girl) make the delivery. **CLAUDIO** Valdez and **CROTEAU** met at

their residence (34 Burnside Ave.) and then drove to meet **JUAN** together in the white Volvo to get the heroin. I believe **JUAN** Valdez prepared the heroin for **JOVAN** at 103/105 Woodbine Ave. and then provided it to **CROTEAU** on Noyes Ave.

CROTEAU drove to Dorchester MA and delivered the heroin to **JOVAN** inside his residence at 195 Hamilton Street. I believe **JOVAN** provided **CROTEAU** with \$3,500 towards the purchase of narcotics and then **CROTEAU** (who lives in the basement apartment) brought the money "upstairs" to apartment 3F at 34 Burnside Ave., where **CLAUDIO** Valdez resides.

264. Based on all of these intercepted communications and surveillance I believe that **JOVAN** actively conducts heroin trafficking activity at his residence located at 195 Hamilton Street, Dorchester, MA.

Manuel aka "Don" CASTILLO

265. Manuel aka "Don" **CASTILLO** (DOB: 12/28/1978) and Esther aka "Estella" Franco (DOB: 02/21/1982) are both citizens of the Dominican Republic who have children together. They are Legal Permanent Residents of the United States. They reside together at 223 Massachusetts Ave., Providence, RI for which a search warrant is requested.

266. Around March 8, 2017, they moved from 171 Massachusetts Avenue to 223 Massachusetts Avenue, both in Providence. On that day, surveillance officers saw **JUAN** and **CLAUDIO** Valdez helping them to move to their new residence. **CLAUDIO** Valdez even recruited two of his drug customers, Melvin Colon and **PELLOT**, to help with the move. The electric service account for 171 Massachusetts Ave. was in Franco's

name. The new electric service for 223 Massachusetts Ave. is in **CASTILLO's** name. Investigation has shown that Franco uses cellular telephone number (347) 691-8155, which is subscribed to her son and **CASTILLO** uses cellular telephone number (929) 403-7195, which is a prepaid phone with no subscriber information.

267. In addition to helping with the move on March 8, 2017, at approximately 9:46 a.m., **CASTILLO** called **CLAUDIO** Valdez on Target Telephone IV and asked him to stop by his house so they can talk about the "stuff from up there/above." **CLAUDIO** Valdez said he would stop by later.

268. At approximately 11:03 a.m., **CLAUDIO** Valdez called **CASTILLO** and said he was arriving. **CASTILLO** specified that he was at his new house. At approximately 12:49 p.m., surveillance observed **CLAUDIO** Valdez as he left 223 Massachusetts Ave. and left the area in the silver BMW.

269. **CASTILLO** again called **CLAUDIO** Valdez at approximately 1:57 p.m. and informed him, "The people visiting are already here." He asked if **CLAUDIO** Valdez wanted to talk to the "Negra" referring to Franco by that name to determine if she or **CLAUDIO** Valdez wanted to go. **CLAUDIO** said it would be easier for Franco because he does not have "it" "complete" yet. **CLAUDIO** explained that Franco did not want to tell him what to do because she was talking on the "other one" (phone). The pair agreed to talk later. After hanging up the phone with **CASTILLO**, **CLAUDIO** immediately called Franco. During the conversation, **CLAUDIO** Valdez asked Franco to meet him so he could give her some "tickets." Franco replied, "So come my love ... that way we can talk." Franco added that this time it was going to be something

"different" and that she prefers to talk in person. She added, "Do you remember that the other time was 32.5? Now I cannot do more than 32 ... but it is good." Franco said she was going to put **CASTILLO** on the phone but she preferred to talk to **CLAUDIO** Valdez in person. **CASTILLO** then got on the phone and told **CLAUDIO** Valdez that they, an unidentified third party (UTP), brought "one extra." **CLAUDIO** Valdez explained that he was in the process of collecting money, like "10 pesos" and that he would provide that to **CASTILLO**. **CASTILLO** then asked **CLAUDIO** if he wanted "1" or "1.5" and **CLAUDIO** Valdez replied, "Just 1." **CLAUDIO** Valdez then asked **CASTILLO** to call him from the other number. **CLAUDIO** Valdez immediately received an incoming call from Franco, using **CASTILLO**'s phone. **CLAUDIO** Valdez told her that if "it" shows up tomorrow then he will give her "10 pesos" before the week is over. Franco then explained to **CLAUDIO** Valdez that this is not coming from her usual "friend ... this is some people that we were introduced to and that's why we are fighting ... fighting to see if later on they can give it to us a bit better. But it is something good that you will like, I opened it myself and I checked it myself."

270. Based on my training and experience, in these conversations I believe that **CLAUDIO** Valdez arranged to purchase cocaine (stuff from up there/above) from **CASTILLO** with Franco's assistance. I believe that the cocaine was from a new supplier and that the price per kilogram will be approximately \$32,000. Franco vouched for the quality of the cocaine, claiming that she personally checked a sample of it. I believe that **CLAUDIO** Valdez is going to pay **CASTILLO** \$10,000 towards the cocaine purchase. I

believe **CASTILLO** asked **CLAUDIO** Valdez if he wanted one kilogram ("1") or 1.5 kilograms ("1.5") and **CLAUDIO** Valdez said he only wanted one.

271. On March 9, 2017, **CLAUDIO** Valdez and **CROTEAU** went 223 Massachusetts Ave. in the silver BMW. **CLAUDIO** Valdez went inside the residence for approximately 14 minutes while **CROTEAU** waited outside. **CLAUDIO** Valdez then returned to the vehicle and they left the area.

272. On March 11, 2017, at approximately 10:52 a.m., **CLAUDIO** Valdez called **CASTILLO** and asked if he was home and **CASTILLO** confirmed that he was. **CLAUDIO** Valdez said he had some "money" to give to **CASTILLO**. **CASTILLO** said he was about to leave and they agreed to meet later. At approximately 11:45 a.m., **CLAUDIO** Valdez again called **CASTILLO** and asked if he was at his "little house." **CASTILLO** said he would be home in about 10 minutes and told **CLAUDIO** Valdez the door was unlocked, offering that he could go in when he gets there. **CLAUDIO** Valdez asked **CASTILLO** whom he is giving the money to and said he is going to drop of "four pesos." **CASTILLO** said he has some of "that" left, that he has "two" left. **CLAUDIO** Valdez said he was coming with his brother (**JUAN** Valdez) and that they would talk more in person.

273. At approximately 2:51 p.m., **CASTILLO** called **CLAUDIO** Valdez and asked if he could send the "Bori" (Melvin Colon) over to help clean and move. I know that Colon is a heroin addict that orders heroin on almost a daily basis from **CLAUDIO** Valdez. **CLAUDIO** Valdez said he will tell Colon to go over but Colon is going to ask

for "a little thing." **CLAUDIO** Valdez asked **CASTILLO** if he had "a little thing" over there (223 Massachusetts Ave.) for **COLON** and **CASTILLO** confirmed that he did.

274. Based on these conversations, I believe that **CLAUDIO** Valdez dropped off \$4,000 to **CASTILLO** at 223 Massachusetts Ave. to put towards the cocaine purchase. I also believe that **CASTILLO** had narcotics, most likely heroin (a little thing) at 223 Massachusetts Ave. that he was going to give Colon (a heroin addict) as a form of payment for helping him clean and move.

275. On March 16, 2017 at approximately 10:37 a.m., **CLAUDIO** Valdez called **CASTILLO** and asked what time they were going to meet "over there" (223 Massachusetts Ave.) because he (**CLAUDIO** Valdez) was going to give **CASTILLO** "that money." **CASTILLO** directed **CLAUDIO** Valdez to come over at 1:30 p.m. At approximately 1:32 p.m., **CLAUDIO** Valdez called **CASTILLO** and said, "I'm coming to give you the tickets ... this girl (**CROTEAU**) needs to go to the bathroom." **CASTILLO** told **CLAUDIO** that he left the door open and to come in. Approximately one minute later, **CLAUDIO** Valdez, **JUAN** Valdez and **CROTEAU** were observed arriving at 223 Massachusetts Ave. and entering the residence. They left about 20 minutes later.

276. I know that "tickets" mean money. Based on these conversations and surveillance, I believe that **CLAUDIO** Valdez, **JUAN** Valdez and **CROTEAU** went to 223 Massachusetts Ave. to provide **CASTILLO** with money towards drugs that **CASTILLO** provided them or was about to provide them.

277. On March 20, 2017 at approximately 2:40 p.m., **CLAUDIO** Valdez called **CASTILLO** and asked if he could stop by so they could talk. Approximately seven minutes later, the silver BMW was observed parked, unoccupied, outside of 223 Massachusetts Ave., Providence, RI. At approximately 3:10 p.m., **CLAUDIO** Valdez called **JUAN** Valdez. During the conversation, **JUAN** Valdez asked if **CLAUDIO** Valdez spoke to "Esther's husband" (**CASTILLO**) and **CLAUDIO** Valdez replied, "I was talking to him just now. I already told him what I had in mind and then he told me to stop by later with your brother so we can finish talking." **CLAUDIO** Valdez said, "He sent the money" and it would be a "few more days." **JUAN** Valdez asked, "But he already sent it? He said that it is arriving?" **CLAUDIO** Valdez replied, "He said that he sent the money and that was going to arrive. That the man was going to send different things."

278. Based on this conversation and surveillance, I believe that **CLAUDIO** Valdez went to 223 Massachusetts Ave., to meet with **CASTILLO** and discuss a pending drug transaction. I believe that **CASTILLO** sent money to his source of supply and that he is waiting for the narcotics to be delivered.

279. On March 24, 2017 **CLAUDIO** Valdez had two conversations on Target Telephone IV about a drug order:

- At approximately 5:53 p.m., **CLAUDIO** Valdez received an incoming call on from **CASTILLO** who used telephone number (929) 403-7195. During the conversation, **CASTILLO** asked **CLAUDIO** Valdez to tell him about the "stuff" he received and asked how much was "missing." **CLAUDIO** Valdez

said "three" were missing and that "it" had been taken "off the top."

CASTILLO sought clarification. He asked specifically if it was missing from the "middle" or the "side" and **CLAUDIO** Valdez repeated that it was missing from the top. **CASTILLO** said he was going to talk to "his friend" (a UTP) about what was missing but since **CLAUDIO** got it about a week ago and did not tell **CASTILLO** that something was missing until yesterday, he is not sure what can be done. **CASTILLO** told **CLAUDIO** Valdez that "you should have told me sooner." **CLAUDIO** Valdez explained to **CASTILLO** that he did not check right away because he trusted him. The pair agreed to speak later.

- At approximately 7:36 p.m., **CLAUDIO** Valdez called **CASTILLO**. **CLAUDIO** asked if the UTP believed that some was missing. **CASTILLO** said there was no problem and asked if it was "good." **CLAUDIO** Valdez said everything was good but that if it was "bad" he would have told **CASTILLO**. **CASTILLO** said he planned to call **CLAUDIO** Valdez tomorrow afternoon because "they" already called me. **CLAUDIO** Valdez replied, "...are you going to have to go to the Apple?" **CASTILLO** responded, "I think so but they will let me know tonight if they will come here or if I have to go over there." The pair agreed to speak the following day.

280. On March 25, 2017 at approximately 12:41 p.m., **JUAN** Valdez used Target Telephone III to call **CLAUDIO** Valdez on Target Telephone IV. **JUAN** Valdez asked, "Has Esther's husband said anything?" **CLAUDIO** Valdez said he had not but he would call and check. **JUAN** Valdez then said "But if he is going over there ... tell him to bring come cut for the "ojitos cerrados," that white stuff, the cut. Tell him that it's the

bitter one. Tell him, get me a bitter one that they sell for that. Ask over there for the bitter one and for him to bring enough. I'll pay him here."

281. Again, at approximately 1:11 p.m., **CLAUDIO** Valdez used Target Telephone IV to call **CASTILLO**. During the conversation **CLAUDIO** Valdez said, "My brother was telling me that if you go to the apple and the pear ... you know where ... he was telling me about the cut for the ojitos cerrados ... to see if you can get him that over there ... did you talk about that with him?" **CASTILLO** replied, "No, it was about something else, not about that, but I will ask and see." **CLAUDIO** Valdez then clarified, "there is a special cut for the ojitos cerrados" and again asked about "the apple." **CASTILLO** told **CLAUDIO** Valdez he would call him later.

282. From these conversations, I understood that **CASTILLO** brokered a deal with a UTP that supplied **CLAUDIO** Valdez with narcotics, about one week ago. (Eight days earlier, on March 16, 2017, **CLAUDIO** Valdez was seen by surveillance officers at 223 Massachusetts Ave. in Providence. I believe that drug was most likely cocaine because that is **CLAUDIO** Valdez's area of responsibility and they had earlier discussed a kilogram of "the stuff from above" for "32" (\$32,000). Prior to arriving, **CLAUDIO** Valdez called **CASTILLO** and said he was coming over to give **CASTILLO** some "tickets." "Tickets" meant money to pay for the drug shipment. When **CASTILLO** asked about the "stuff" he was asking about that drug shipment. **CLAUDIO** Valdez told him that 3 were missing from the top. That meant that either 30 or 300 grams were missing from the shipment. While the reference to weight was not very clear in context, only 3 grams missing from a large shipment of drugs would not be of that much

concern. **CASTILLO** complained that **CLAUDIO** Valdez only brought it to his attention "yesterday." (Surveillance officers had noted that **CLAUDIO** and **JUAN** Valdez met with **CASTILLO** the previous day at his residence on Massachusetts Ave.) Other than the amount that was missing, **CLAUDIO** Valdez was satisfied with the quality of the drugs. Finally, **CASTILLO**'s drug suppliers have another shipment that has arrived and **CASTILLO** may have to go the New York City (the Apple) to get it.

283. On April 1, 2017 at approximately 12:35 p.m., **CLAUDIO** Valdez called franco. She said that **CASTILLO** "switched" phones and got a new one. She then put **CASTILLO** on the phone. **CASTILLO** told **CLAUDIO** Valdez that things were "not good." **CASTILLO** explained that he had not called **CLAUDIO** Valdez because, "They supposedly arrested the man on that side." **CASTILLO** explained that he was calling and calling "the man" and then he found out. **CASTILLO** said he was going to wait a couple days to see if someone calls. **CASTILLO** suggested that they get together in person to talk about the situation. **CLAUDIO** Valdez said he was going to call his brother and then they would meet later. **CLAUDIO** Valdez then immediately called **JUAN** Valdez and said he had just spoke to **CASTILLO** and **CASTILLO** thinks the guy there, the Mexican, was in jail. **CLAUDIO** Valdez said he was going to get more information from **CASTILLO** in person.

284. Based on these conversations coupled with the physical surveillance I believe that **CASTILLO** actively conducts drug trafficking activities at 223 Massachusetts Ave., Providence, RI and that evidence of those crimes will be found there.

Louis A. PELLOT, aka Watchie

285. **PELLOT** (DOB: 12/19/1974) lives at 251 Randall St., 2nd Floor, Pawtucket, RI. According to RI DMV records, Luis Pellot, residing at 251 Randall St., 2nd Floor, Pawtucket, RI was issued RI Driver's License number 2493155 on 01/24/2017. Surveillance has confirmed that the person utilizing telephone number (401) 428-0879 is the person depicted in the RI Driver's License.

286. **PELLOT** is a drug courier for **CLAUDIO** Valdez who makes small deliveries to a few customers. In monitored conversations **PELLOT** spoke of an employment relationship with **CLAUDIO** Valdez. He has been intercepted numerous times. **PELLOT** has been watched and photographed by surveillance teams meeting with **CLAUDIO** Valdez after ordering drugs for his own customers or while making deliveries for **CLAUDIO** Valdez.

287. On March 6, 2017, at approximately 4:10 p.m., **CLAUDIO** Valdez used Target Telephone IV to place an outgoing call to telephone number (401) 428-0879. That telephone number is subscribed to Luis Pellot. During the conversation, **PELLOT** asked **CLAUDIO** Valdez if he had some "stuff" ready and **CLAUDIO** said he did not. **PELLOT** then asked **CLAUDIO** Valdez to bring down what he had asked for. **CLAUDIO** Valdez said he was going somewhere to pick-up money first but would call **PELLOT** later to figure out a place to meet. At approximately 5:03 p.m., **CLAUDIO** Valdez called **PELLOT** and directed him to meet at the Stop and Shop Pharmacy on Mineral Spring Ave. At approximately 5:17 p.m., **CLAUDIO** Valdez received an incoming call from **PELLOT**. During the conversation, the men discussed meeting at

the pharmacy. **CLAUDIO** Valdez stated that he did not like "parking in lots" and that he would follow **PELLOT** to a side street. The conversation continued as the pair followed each other to a side street and eventually met. At approximately 6:33 p.m., **CLAUDIO** Valdez received an incoming call from **PELLOT**. During the conversation, **PELLOT** told **CLAUDIO** Valdez that a UTP "only took seven." **PELLOT** explained that he expressed his dissatisfaction with the UTP because the UTP had asked for "14." **CLAUDIO** Valdez was upset with **PELLOT** and said **PELLOT** should have verified what the UTP wanted. **CLAUDIO** Valdez said he wanted to talk about the situation further in person. **PELLOT** said he was at his house, by exit 26 (Interstate 95 in Pawtucket, RI) and that "Jennifer" (**PERDOMO**) knows where it is because she had been there before. **CLAUDIO** Valdez confirmed that he was currently driving with her.

288. In the transaction with **PELLOT** I believe that **CLAUDIO** Valdez gave him 14 grams of narcotics for **PELLOT** for resale to a UTP drug customer. That is, **PELLOT** is a lower level drug dealer who used **CLAUDIO** Valdez as his source of supply. The UTP only took seven of the 14 grams and therefore **CLAUDIO** Valdez was not pleased. **PELLOT** gave **CLAUDIO** Valdez directions to his residence on Randall St. in Pawtucket, RI so that they could discuss the matter in person. Exit 26 on Interstate 95 is located in close proximity to Randall Street. The person identified as "Jennifer" who knew her way to **PELLOT**'s apartment was **PERDOMO**.

289. **CLAUDIO** Valdez was also monitored in other drug related conversations with **PELLOT**. For example, on March 10, 2017 at approximately 11:15 a.m., **CLAUDIO** Valdez received an incoming call on Target Telephone IV from

PELLOT. During the conversation, PELLOT said he needed seven "hard" and a half of the "grease." CLAUDIO Valdez said a half was too small and PELLOT told him to bring "one" and said it was for a UTP (drug customer). The pair agreed to meet later. At approximately 12:00 p.m., CLAUDIO Valdez received a call from PELLOT. During the conversation, CLAUDIO Valdez directed PELLOT to come to Woonsocket. CLAUDIO Valdez asked PELLOT if he remembered the "Bori" from Valley St. in Providence (a reference to Colon). PELLOT confirmed that he did. CLAUDIO said the "Bori" wanted "something" and he (CLAUDIO) will give it to PELLOT for PELLOT to bring to the "Bori." At approximately 12:28 p.m., CLAUDIO Valdez placed an outgoing call to PELLOT. During the conversation, PELLOT said he was five minutes away. At approximately 12:32 p.m., CLAUDIO Valdez and CROTEAU were observed leaving the stash house at 87 Dulude Ave., Woonsocket, RI and entering the silver BMW. The BMW was watched as it went to Elm St. Pizza, located at 596 Elm St., Woonsocket, RI. CLAUDIO Valdez was the driver. PELLOT was seen arriving at the pizza restaurant in a black Mitsubishi sedan (RI 365 396). PELLOT parked the black Mitsubishi next to the silver BMW. He briefly entered the rear seat of the BMW and then returned to his car. Both vehicles then left the area. At approximately 12:39 p.m., the silver BMW was observed arriving at 34 Burnside Avenue and parking behind the residence. CLAUDIO Valdez and CROTEAU were observed walking from the silver BMW towards the entrance to 34 Burnside Avenue.

290. I interpreted this conversation to involve the delivery of seven grams of crack cocaine (hard) and one gram of heroin (grease) by PELLOT to Colon (the Bori on

Valley Street) for **CLAUDIO** Valdez. The drugs were brought from the stash house (Dulude). **CLAUDIO** Valdez and **CROTEAU** retired to their residence (Burnside) after the drug deal.

291. On March 22, 2017, at approximately 6:08 p.m., **CLAUDIO** Valdez received an incoming phone call (401-726-1621) on Target Telephone IV from **PELLOT** who used the name "Watchie." During the conversation, **PELLOT** told **CLAUDIO** Valdez that he had "yours put away" and that he has a UTP (drug customer) that was going to need "14" for tomorrow or the following day. **CLAUDIO** Valdez pressed **PELLOT** to find out exactly when the UTP needed "that" because he does not like to rush. **PELLOT** assured that he would get an exact time from the UTP and, if anything, the UTP will have to wait. **PELLOT** said the UTP will wait for the "good stuff ... he will wait for your stuff. Do you remember when I brought that to Luigi's buddy, the other day? That kid told me, 'damn crazy.' Where did you find a thing like that? The client is satisfied. They have never given me a complaint."

292. I believe that when **PELLOT** told **CLAUDIO** Valdez that he had "yours put away" he was informing **CLAUDIO** that he had collected drug money from his customers and was ready to pay him. **PELLOT** had also arranged for another drug customer to buy 14 grams of drugs within the next two days. **PELLOT** reported his satisfaction with the quality of narcotics that **CLAUDIO** Valdez supplied. **PELLOT** boasted that the customers are willing to wait for the "good stuff" supplied by **CLAUDIO** Valdez ("your stuff"). **PELLOT**'s customers were very satisfied with the quality (damn crazy) and never complained.

293. On March 23, 2017 at approximately 1:27 p.m., **CLAUDIO** Valdez used Target Telephone IV to call Melvin Colon (DOB: 11/20/1974) aka "Bori" on telephone number (401) 771-2585. Colon resides at 118 ½ Valley St., Providence, RI. Colon has been identified as a heroin and cocaine customer of **CLAUDIO** Valdez who orders heroin and/or cocaine on an almost daily basis. Colon also barter prescription pain medications for his drugs. During this conversation, Colon offered to give **CLAUDIO** Valdez 30 pills tomorrow to pay towards his drug debt. **CLAUDIO** Valdez reminded Colon that he owed him money for a "hard one" and "one of the other." **CLAUDIO** Valdez said he would take all of the pills and asked if they were "15's." He also asked if Colon's wife kept some of them for herself. Colon confirmed that the pills were 15's. He further explained that his wife uses morphine and does not take the pills. Colon then informed **CLAUDIO** Valdez that his wife starts therapy next month and the pills will be "30's."

294. Surveillance officers have observed **PELLOT** deliver drugs to Colon on behalf of **CLAUDIO** Valdez. Previously intercepted conversations between Colon and **CLAUDIO** Valdez also involved the sale of his wife's prescription pain medicine to **CLAUDIO** Valdez. During this conversation, I understood **CLAUDIO** Valdez to remind Colon that he owed him for one gram of crack cocaine (hard one) and one gram of heroin (the other one). Colon intended to barter his wife's 15 milligram pain pills to satisfy his drug debt and for future drug deliveries.

295. On the morning of March 24, 2017, **CLAUDIO** Valdez used Target Telephone IV to have a number of drug related conversations with **PELLOT** and Colon:

- At approximately 10:28 a.m., **PELLOT** called **CLAUDIO** Valdez. During the conversation, **PELLOT** said he was around where the UTP lives and **CLAUDIO** Valdez asked what the UTP wanted. **PELLOT** replied, a “pelito” (little hair) of the “resbalosa” (slippery). **CLAUDIO** Valdez said they would do “that” later and asked **PELLOT** if he had the money from the other one. **PELLOT** confirmed that he had the money at home.
- At approximately 10:38 a.m., **CLAUDIO** Valdez called **PELLOT**’s telephone number. The call was answered by Martha Guzman. Investigation to date has identified Guzman as **PELLOT**’s girlfriend or wife. The pair reside together at 17 Hendricks St., Central Falls, RI. Guzman informed **CLAUDIO** Valdez that **PELLOT** was taking a shower.
- At approximately 10:51 a.m., **PELLOT** called **CLAUDIO** Valdez. During the conversation, **PELLOT** said he will be driving Guzman’s vehicle until his new vehicle is registered. **PELLOT** assured **CLAUDIO** Valdez that he will be a good worker and will not steal from him. **PELLOT** said that he knows how to “work on the streets” and that he will not do anything to go back to jail. **CLAUDIO** Valdez emphasized that, if **PELLOT** lies, “things” will not work out.
- At approximately 11:08 a.m., **PELLOT** called **CLAUDIO** Valdez. During the conversation, the pair agreed to meet on Valley St. in a short while. **CLAUDIO** Valdez said he wanted to introduce **PELLOT** to someone afterwards. **PELLOT** agreed that person can become another one of his “customers ... like the Puerto Rican customer that lives on Valley Street ... that buys every day” (a reference to Colon). **CLAUDIO** Valdez asked **PELLOT** where his customer lived and **PELLOT** said by the Hartford projects.

296. That afternoon the two men planned to meet and conduct the business at hand.

- At approximately 12:08 p.m., **PELLOT** called **CLAUDIO** Valdez and asked if he was almost there. **CLAUDIO** Valdez said he would be arriving shortly. **PELLOT** said he was there, parked by the bakery.
- At approximately 12:14 p.m., **CLAUDIO** Valdez called Colon. During the conversation, **CLAUDIO** Valdez asked Colon if he had gotten the pills yet. Colon said he was sick and did not want to walk to the pharmacy. **CLAUDIO** Valdez replied, "I will take you to get them. I will go with a friend of mine. We will go together." **CLAUDIO** Valdez then asked Colon if he had the "prescription" and Colon confirmed that he did.
- At approximately 12:29 p.m., **PELLOT** called **CLAUDIO** Valdez. During the conversation, **PELLOT** clarified that he was in an SUV and still waiting by the bakery. **PELLOT** told **CLAUDIO** Valdez that the Puerto Rican (Colon) was meeting them there. **PELLOT** also offered to drive **CLAUDIO** Valdez to meet the new drug customer in the Hartford Projects.

297. At approximately 12:30 p.m., surveillance officers saw **CLAUDIO** Valdez arrive on Grove St. in the white Volvo. He parked next to a gold Honda CRV (RI JO-936, registered to Martha Guzman). The vehicles were near the Maya Bakery located at 113 Valley St. in Providence. Surveillance officers also saw Colon standing next to the white Volvo and gold Honda. After the meeting he returned to 118 ½ Valley St. After Colon walked away, the gold Honda was followed by surveillance to the Hartford projects. **PELLOT** was the driver and **CLAUDIO** Valdez was the front seat passenger. The white Volvo remained parked on Grove St.

298. At approximately 1:29 p.m., **CLAUDIO** Valdez used Target Telephone IV to call Colon on telephone number (401) 771-2585. Colon shares that phone with his

wife. During the conversation, Colon's wife told **CLAUDIO** that Colon had gone to the pharmacy.

299. Based on these conversations and surveillance, I determined that **PELLOT** works for **CLAUDIO** Valdez and that Colon is both a heroin customer and a pain medication supplier. **PELLOT** asked **CLAUDIO** Valdez to supply him with a quantity (Pellito) of heroin (Resbalosa) to sell to a new customer that resides in the Hartford projects. They also further discussed the plan to get prescription medications. **PELLOT** appeared to be actively running drugs and recruiting customers for **CLAUDIO** Valdez. **PELLOT** promised to be a good worker who would not steal any of the money or drugs with which he was entrusted. **PELLOT** boasted that he knows how avoid detection and apprehension ("work on the streets") and that he would not do anything that would send him back to jail. **CLAUDIO** Valdez acknowledged that he was willing to employ **PELLOT** as a drug runner as long as **PELLOT** was trustworthy. I believe that **CLAUDIO** Valdez and **PELLOT** supplied Colon with drugs on Grove St. before **PELLOT** drove **CLAUDIO** Valdez to the Hartford project to meet the new customer.

RAMON Antonio GUZMAN Reynoso alias Mariano Gusman

300. **GUZMAN** (DOB 5/1/1980) also uses the name "Mariano Gusman." A Facebook search identified **GUZMAN**'s Facebook account under the name "Mariano Gusman." Phone intercepts and surveillance later confirmed that the Mariano Gusman depicted in the Facebook account was **GUZMAN**. **GUZMAN** uses telephone number (401) 396-6517 (**GUZMAN**'s number). **GUZMAN**'s number is a prepaid phone.

GUZMAN lives at 35 DeSoto St., Apartment 2, Providence, RI for which I am requesting a search warrant.

301. On March 24, 2017 at approximately 8:42 p.m., **CLAUDIO** Valdez received an incoming call on Target Telephone IV from **GUZMAN** on his own telephone number (401) 396-6517 (**GUZMAN**'s number). **GUZMAN** asked what his "tab" was. **CLAUDIO** said he did not know for sure but estimated it was "500." **GUZMAN** then told **CLAUDIO** Valdez that tomorrow he wanted "20" and was going to give him "1,000 pesos." **GUZMAN** then clarified that he wanted "20 of the brown." **CLAUDIO** Valdez told **GUZMAN** "20 pesos is 1,500." The pair agreed to meet the following day at about noontime. I believe that this represented a negotiated sale of 20 grams of heroin for \$1,500.

302. Following the conversation with **GUZMAN**, **CLAUDIO** Valdez immediately called **JUAN** Valdez on Target Telephone V. **CLAUDIO** told his brother that "Papiline's brother" (**GUZMAN**) wants "20 pesos." **JUAN** Valdez said that he gave "30 pesos" to "Papiline" last time and that **CLAUDIO** said that he still owed money. **JUAN** Valdez suggested that **CLAUDIO** Valdez "put it at 75" for **GUZMAN**. **CLAUDIO** Valdez replied that he put it at "1,500."

303. On March 25, 2017, at approximately 9:07 a.m., **JUAN** Valdez called **CLAUDIO** Valdez and directed him to go see "Bori" because Bori had called him like "50,000 times." **CLAUDIO** Valdez reminded **JUAN** Valdez that the "guy on Manton ... wants 20 pesos too ... the one on Manton that we went to ... and remember about Papiline, the 20 pesos." At approximately 10:25 a.m., **CLAUDIO** Valdez called **JUAN**

Valdez. During that conversation, **JUAN** said he was driving "there" and that he would give **CLAUDIO** "two ... 20 for Papiline and 20 for the guy for the ojitos cerrados." **JUAN** Valdez said he would call **CLAUDIO** when he was ready to meet. I know that in this case ojitos cerrados means heroin and that **JUAN** Valdez supplies that drug.

304. At approximately 11:13 a.m., **JUAN** Valdez was observed arriving "there" 103/105 Woodbine St., Cranston, RI in a gray Nissan Altima (RI KE-239). He entered the stash house. I believe that **JUAN** Valdez went there to fill the drug orders.

305. At approximately 11:14 a.m., **GUZMAN** called **CLAUDIO** Valdez in order to remind him about the deal they arranged the day before. **GUZMAN** said he would be "there" in less than an hour. **CLAUDIO** Valdez reminded **GUZMAN** that it is "1,500 for 20 pesos ... it's at 75 ... and **GUZMAN** can add whatever he wants." The pair agreed to meet a short time later.

306. At approximately 12:02 p.m., **JUAN** Valdez was observed leaving 103/105 Woodbine St., entering the gray Altima and departing the area. Approximately 15 minutes later, **JUAN** Valdez was observed by surveillance meeting with **CLAUDIO** Valdez at the auto repair shop located at 60 Reservoir Ave., Providence, RI. I believe that **JUAN** Valdez filled the drug orders at the stash house and met his brother at the auto body shop that the visit daily in order to deliver the drugs to **CLAUDIO**.

307. Surveillance noted that at approximately 12:17 p.m., **CLAUDIO** Valdez left the car shop in the white Volvo. At approximately 12:19 p.m., **CLAUDIO** Valdez placed a call to **GUZMAN** and told him he was in route. **GUZMAN** said that he was

home and directed **CLAUDIO** Valdez to go to the back. At approximately 12:32 p.m., **CLAUDIO** Valdez was observed parking on Harris Ave. and walking to the rear of 35 DeSoto St. While walking to the rear of the residence **CLAUDIO** Valdez called **GUZMAN** and told him, he was there. At approximately 12:58 p.m., **CLAUDIO** Valdez left 35 DeSoto St. and departed the area in the white Volvo.

308. Based on these conversations and surveillance, I believe that **GUZMAN** is a dealer who uses **CLAUDIO** and **JUAN** Valdez as a source of supply. I believe that **CLAUDIO** Valdez delivered 20 grams of heroin (the brown) to **GUZMAN** for \$75 per gram (\$1,500) at his home on March 25, 2017.

309. On April 2, 2017 **CLAUDIO** Valdez and **GUZMAN** spoke on two occasions. During the calls, they arranged to do "that" tomorrow because sometimes he makes Sunday "family day." On April 3, 2017, at approximately 9:31 a.m., **GUZMAN** called **CLAUDIO** Valdez. During the conversation, **CLAUDIO** asked **GUZMAN** what was "moving" and **GUZMAN** asked for "15." **CLAUDIO** Valdez said he would call his brother and then let **GUZMAN** know what time they would meet.

310. At approximately 9:35 a.m., **CLAUDIO** Valdez called **JUAN** Valdez and told him that **GUZMAN** wanted "15." **JUAN** Valdez said he had just got there (Providence) and the pair agreed to meet in about an hour.

311. At approximately 9:53 a.m., **JUAN** Valdez was observed arriving at the stash house at 103/105 Woodbine St. in the gray Nissan Altima. After about a half hour, at approximately 10:28 a.m., **JUAN** Valdez left 103/105 Woodbine St. and drove off in the gray Altima. The Altima was followed by surveillance to Noyes Ave. in

Providence, RI. At approximately 10:58 a.m., **PERDOMO** dropped-off **CLAUDIO** Valdez on Noyes Ave.

312. **GUZMAN** was observed arriving at 35 DeSoto St. at approximately 11:09 a.m., in a silver Pontiac Grand Am (RI 967-755) and entering the residence. At approximately 11:20 a.m. **JUAN** Valdez and **CLAUDIO** Valdez left Noyes Avenue in the gray Altima and they were followed by surveillance to **GUZMAN**'s residence at 35 DeSoto Street. When they arrived, **CLAUDIO** Valdez left the gray Altima while on the phone with **GUZMAN**. **CLAUDIO** Valdez said he was outside. **CLAUDIO** Valdez then entered 35 DeSoto St. and spent about five minutes there. **CLAUDIO** Valdez left the residence and departed the area in the gray Altima with **JUAN** Valdez.

313. At approximately 12:20 p.m., **GUZMAN** left 35 DeSoto St. in the silver Pontiac. He drove to 220 Pearl St., Providence, RI and went inside. At approximately 12:46 p.m., **GUZMAN** left 220 Pearl St. and briefly entered the front passenger seat of a maroon utility van (RI 63628). An Unidentified Male (UM) that had been waiting for several minutes occupied the driver's seat of the van. After spending about two minutes with the UM, **GUZMAN** returned to the silver Pontiac. The Pontiac was next followed by surveillance to Westminster St. where a traffic stop was conducted by a marked Providence Police cruiser. The driver and only occupant of the vehicle was positively identified as **GUZMAN**. **GUZMAN** presented the officer with a driver's license from the Dominican Republic in the name of Ramon Guzman, residing in Bani, Dominican Republic. **GUZMAN** did not have any driver's license that was issued in the United States. When asked by the officer where he lived, **GUZMAN** provided an

Providence, RI. At approximately 10:58 a.m., **PERDOMO** dropped-off **CLAUDIO** Valdez on Noyes Ave.

312. **GUZMAN** was observed arriving at 35 DeSoto St. at approximately 11:09 a.m., in a silver Pontiac Grand Am (RI 967-755) and entering the residence. At approximately 11:20 a.m. **JUAN** Valdez and **CLAUDIO** Valdez left Noyes Avenue in the gray Altima and they were followed by surveillance to **GUZMAN**'s residence at 35 DeSoto Street. When they arrived, **CLAUDIO** Valdez left the gray Altima while on the phone with **GUZMAN**. **CLAUDIO** Valdez said he was outside. **CLAUDIO** Valdez then entered 35 DeSoto St. and spent about five minutes there. **CLAUDIO** Valdez left the residence and departed the area in the gray Altima with **JUAN** Valdez.

313. At approximately 12:20 p.m., **GUZMAN** left 35 DeSoto St. in the silver Pontiac. He drove to 220 Pearl St., Providence, RI and went inside. At approximately 12:46 p.m., **GUZMAN** left 220 Pearl St. and briefly entered the front passenger seat of a maroon utility van (RI 63628). An Unidentified Male (UM) that had been waiting for several minutes occupied the driver's seat of the van. After spending about two minutes with the UM, **GUZMAN** returned to the silver Pontiac. The Pontiac was next followed by surveillance to Westminster St. where a traffic stop was conducted by a marked Providence Police cruiser. The driver and only occupant of the vehicle was positively identified as **GUZMAN**. **GUZMAN** presented the officer with a driver's license from the Dominican Republic in the name of Ramon Guzman, residing in Bani, Dominican Republic. **GUZMAN** did not have any driver's license that was issued in the United States. When asked by the officer where he lived, **GUZMAN** provided an

address of 35 DeSoto St., Apartment 2, Providence, RI. I have checked with Immigration and Customs Enforcement officers and ICE has no record of **GUZMAN** being lawfully present in the country.

314. Based on these conversations and surveillance, I believe that **GUZMAN** ordered 15 grams of heroin from **CLAUDIO** Valdez. I believe **JUAN** Valdez prepared the 15 grams of heroin for **GUZMAN** at 103/105 Woodbine St. and then met **CLAUDIO** Valdez on Noyes Ave. so they could deliver the heroin to **GUZMAN**. I believe **CLAUDIO** Valdez provided **GUZMAN** with the heroin inside of 35 DeSoto St. I believe **GUZMAN** then departed his residence and met with one or two of his drug customers on Pearl St. I also believe that **GUZMAN** is currently residing in the United States illegally.

315. I believe that these calls and surveillance establish that **GUZMAN** is actively conducting drug trafficking activity from his residence at 35 Desoto St. Apartment 2, Providence RI and that evidence of those crimes will be found there.

Wandy DIAZ, alias Jose DeJesus-Escbales, aka Canelo

316. **DIAZ** (DOB 02/27/1986) is not a citizen of the United States. He is believed to be here illegally but has never been previously deported. His true identity is believed to be Wandy Alcibiades **DIAZ** born in Peralta, Dominican Republic based on a Dominican Cedula. **DIAZ** was issued a MA Driver's License on August 8, 2016 in the name of Jose L. DeJesus-Escbales (DOB: 04/22/1980). The address listed on the license for DeJesus-Escbales is 146 Winthrop Ave., Apt. 3, Revere, MA. I believe DeJesus-

Escbales is the true identity of a Puerto Rican born male that is being used by **DIAZ**.

Based on surveillance, **DIAZ** may reside at 171 Reservoir Ave., Providence, RI with his girlfriend, "Jasmin Hernandez-Torres."²⁸ **DIAZ** has been intercepted numerous times on calls monitored pursuant to the Court's wiretap orders participating in criminal and conspiratorial conversations with **JUAN** Valdez concerning the subject offenses.

During those conversations, **JUAN** Valdez referred to **DIAZ** as "Canelo". **DIAZ** has the following criminal history:

- July 2011 – Possession with Intent to Distribute Heroin, Possession with Intent to Distribute Cocaine, Conspiracy to Distribute a Controlled Substance (Arrested by the Franklin, MA PD, Disposition Unknown)
- November 2011 – Possession with Intent to Distribute Schedule I/II and Conspiracy to Distribute a Controlled Substance (Arrested by the Providence PD, Disposition unknown)
- August 2014 – Possession with Intent to Distribute Schedule I/II and Possession with Intent to Distribute 1oz. – 1kilo of Heroin. (Arrested by the Providence PD, Guilty, 15 year sentence, 4 years to serve)

317. On February 10, 2017, **JUAN** Valdez used Target Telephone III to participate in several conversations with **DIAZ** using telephone number (978) 795-7414. During the conversations, the men discussed an Unidentified Third Party (UTP) that has previously been a drug customer of both **JUAN** Valdez and **DIAZ**. For example:

²⁸ Hernandez-Torres was issued a PA Driver's License (on 12/30/2014). The address listed on the license for Hernandez-Torres is 18 W. Lauren St., Shenandoah, PA. I believe Hernandez-Torres is the true identity of a Puerto Rican born female and that **DIAZ**'s girlfriend is also in this country illegally.

- At approximately 11:51 a.m., **JUAN** Valdez called **DIAZ**. During the conversation, **JUAN** Valdez asked **DIAZ** if he dealt with the UTP that goes to "Fermin's." **JUAN** Valdez complained that whenever he gave "it" to the UTP "however it comes" the UTP always said it is "not good." **DIAZ** agreed that the UTP was a bother and said he saw the UTP a couple days ago. **DIAZ** related, "I showed him yours, I showed him what I grabbed, I showed him something else." **JUAN** Valdez told **DIAZ** not to waste his time with the UTP. He offered, "I can't deal with people like that, for real. Look Canelo, I have like 50 people and I have yet to deal with someone like that." **DIAZ** replied that every time the UTP asks for a "photo", he gives him "50" to "check it."
- At approximately 12:05 p.m., **JUAN** Valdez called **DIAZ**. During the conversation, the pair continued to discuss how difficult the UTP could be. They jointly opined that they do not think the UTP knew what he is talking about. **DIAZ** said, "Let me see if this guy is crazy. I will grab 10 and I will add 50 and will give him 60" and see what the UTP says. The men agreed that they were no longer going to do business with the UTP.

318. Based on these conversations, I believe that **JUAN** Valdez and **DIAZ** have a mutual drug customer that frequently complained about the quality of the drugs that **JUAN** Valdez and **DIAZ** provide to him. I also believe that **DIAZ** provided the UTP with a sample (photo) of 50 grams (50) for the UTP to check its quality. Both **JUAN** Valdez and **DIAZ** did not think the UTP was knowledgeable concerning drug quality. To test that hypothesis **DIAZ** proposed that he would deliver a 60-gram drug sample, mixed 10 grams of narcotic to 50 grams of cut.

319. On February 14, 2017 at approximately 12:20 p.m., **JUAN** Valdez used Target Telephone III to call **DIAZ** on telephone number (978) 795-7414. During the

conversation, **JUAN Valdez** and **DIAZ** talked about a UTP that they mutually know to be a drug dealer. **JUAN Valdez** said he knows what the UTP is doing, he is adding the “meta ... they are cutting it with that and then they give it out ... I don’t want to deal with that stuff ... I don’t want to fuck with that.” **DIAZ** replied, “You are dealing with all of that risk, with all of that responsibility ... for one or two thousand pesos.” The men then began to discuss the UTP from the February 10, 2017 conversation. **DIAZ** instructed, “Tell him it is not convenient for me to do business with you ... I cannot be bringing you stuff to where you are and then bringing it back and then you find somebody else. I have brought you 15 jobs. And don’t be telling me that you don’t like any of them.” **DIAZ** and **JUAN Valdez** continued to discuss how “crazy” customers could be. **DIAZ** said, “I just came back from a boy. I gave him one and he tells me the work is good ... and a week later he calls and says the people have returned it to him.” **DIAZ** said he told this customer to “give me the money that you gathered and give me my stuff back, so I won’t have to kill you.” **JUAN Valdez** and **DIAZ** agreed that they could not do business with people like that. **DIAZ** said he was going to see this customer at about 5 p.m. and pick-up “10 pesos” from him. **DIAZ** explained that it is important to pay on time and said, “If I have 20 pesos right there, I give that to the people right away.” At the end of the conversation, **DIAZ** said he was waiting on a “guy” to call for “300 of yours” and that yesterday the “guy” said he liked it.

320. During this conversation, I believe **JUAN Valdez** and **DIAZ** mutually know a heroin dealer that is cutting his heroin with fentanyl (meta). I believe **JUAN Valdez** and **DIAZ** agreed that they do not like to work with fentanyl because of the

“responsibility” that comes with it for a relatively small profit, one or two thousand dollars (pesos). I believe **DIAZ** provided a customer of his with 100 grams (one) of drugs and that the customer returned the product because of complaints about the quality. **DIAZ** said he was going to collect \$10,000 from the customers. I also believe that **DIAZ** was brokering a drug deal with a customer that may purchase 300 grams.

321. On February 21, 2017 at approximately 5:27 p.m., **JUAN** Valdez received an incoming call on Target Telephone III from **DIAZ** using telephone number (978) 566-8388. During the conversation, **DIAZ** told **JUAN** Valdez “they” are asking me for the “number” for “this.” **JUAN** Valdez replied, “Check it first ... I don’t give stuff to people” (before he checks it). **JUAN** Valdez explained, “Sometimes I get three and sometime they get here good ... but ... I want to be sure about that, you get me? So check it first.” **DIAZ** responded, “I’m gonna give it to him to check.” **JUAN** Valdez told **DIAZ** not to worry, “because something is coming with good prices ... it is coming. Don’t worry ... I will organize everything.” **DIAZ** acknowledged and asked **JUAN** Valdez to “give him a good price.” **JUAN** Valdez said he would let **DIAZ** know and that, “that is right around the corner.”

322. Based on this conversation, I believe that **DIAZ** was negotiating with a drug source and wanted to know how much **JUAN** Valdez would be willing to pay per kilogram. **JUAN** Valdez told **DIAZ** to check the quality of what was there and that he (**JUAN** Valdez) does not pay before he was assured the drugs are of good quality. **JUAN** Valdez told **DIAZ** that sometimes he gets three kilograms and they are all of good quality. **JUAN** Valdez informed **DIAZ** that his source of supply had some drugs

on the way. **DIAZ** asked **JUAN** Valdez to sell him some of the drugs that are in route at a good price.

323. On February 23, 2017 at approximately 1:03 p.m., **JUAN** Valdez used Target Telephone III to call **DIAZ** on telephone number (978) 566-8388. During the conversation, **JUAN** Valdez complained about **DIAZ** not answering the phone. **DIAZ** replied, "I am just leaving this shit show ... probation. I can't answer the phone in there." **JUAN** Valdez asked if **DIAZ** had to go every month. **DIAZ** said, "It's nothing and after a while it's just a couple of minutes." **JUAN** Valdez then asked **DIAZ** about a UTP they they were waiting for. **DIAZ** replied, "I already called him and he told me we will meet Friday or Saturday. I am going to see if we can grab half, you hear?" **JUAN** Valdez said "Alright ... I only have a few people for that stuff ... the ones that check it are the same ones that are going to buy." **JUAN** Valdez then said he has some "Sombrerudos" (big hat guys aka Mexicans) and they "give me good prices and plenty of time." **DIAZ** replied, "Exactly, they give you what you want."

324. During this conversation, I believe **DIAZ** told **JUAN** Valdez he could not answer his phone because he was meeting with his probation officer. I know that **DIAZ** is currently on probation in RI stemming from his September, 2014 conviction for heroin trafficking. I believe that **DIAZ** has a drug supplier that he is going to try and get half a kilogram from. I believe the narcotic is likely cocaine because **JUAN** Valdez only has "a few people for the stuff." I know that **JUAN** Valdez distributes significantly more heroin than cocaine. I believe **JUAN** Valdez told **DIAZ** he has a Mexican source of

supply that provides narcotics to him at a good price and they (Mexicans) give him plenty of time to pay for the drugs.

325. On February 28, 2017 at approximately 3:46 p.m., **JUAN** Valdez used Target Telephone III to call **DIAZ** on telephone number (978) 566-8388. During the conversation, they discussed several customers to whom **DIAZ** had provided **JUAN** Valdez's "stuff." One customer received the "stuff" almost two weeks ago and has not paid. **DIAZ** has asked the customer for payment and explained to the customer that it was not his stuff, that it was **JUAN** Valdez's stuff. **DIAZ** assured **JUAN** Valdez he would "solve the problem." **JUAN** Valdez complained that it should not take this customer two weeks to pay "2,000 pesos." The pair continued to discuss problems with various customers and **DIAZ** said, "no one in Providence is good." **JUAN** Valdez agreed and said he was "lucky" that he "deals" with people from other places. At the end of the conversation, **DIAZ** commented that he gave a different customer "200 pesos at 65."

326. Based on this conversation, I believe that **DIAZ** provided a customer with heroin that he (**DIAZ**) received from **JUAN** Valdez. **DIAZ** was still trying to collect \$2000 (pesos) that was owed. I also believe that **DIAZ** provided a separate customer with 200 grams of heroin at \$65 per gram (\$13,000).

327. On March, 8 2017 at approximately 9:59 a.m., **JUAN** Valdez used Target Telephone III to call **DIAZ** on telephone number (978) 566-8388. During the conversation, **JUAN** Valdez asked if **DIAZ** was home and said he was going to stop by. At approximately 10:43 a.m., **JUAN** Valdez again called **DIAZ** and said **DIAZ** gave him

"four pesos." **DIAZ** confirmed. Later that day, **DIAZ** called **JUAN** Valdez and asked about "the headache." **JUAN** Valdez said what came was all "shit." **DIAZ** said he had a friend that wanted 1,500 and asked **JUAN** Valdez to keep him posted.

328. Based on these conversations, I believe **JUAN** Valdez collected \$4,000 (four pesos) from **DIAZ**. I believe the payment was for drugs that **JUAN** Valdez previously provided **DIAZ**. I also believe that **DIAZ** called **JUAN** Valdez and inquired about Percocet pills (the headache). **JUAN** Valdez said the pills he received were of poor quality (shit) and therefore he currently did not have any to sell to **DIAZ**. **DIAZ** has an order for 1,500 pills from one customer.

329. On March 5, 2017 at approximately 1:03 p.m., **JUAN** Valdez used Target Telephone III to call **DIAZ** on telephone number (978) 566-8388. During the conversation, **DIAZ** said he had a guy that needed the "brown." **JUAN** Valdez replied, "I always have the brown. It's good stuff." **DIAZ** said "the guy" wants "200 pesos ... he just called asking me to get some. I'm almost not dealing with that ... things are not good." **JUAN** Valdez replied, "There is no money" right now. **DIAZ** agreed and said there are "three people that used to call me for 100 and 200 and now they are calling for 20 and 30." The men then made arrangements for **JUAN** Valdez to provide the "200" for "the guy."

330. Based on this conversation, I believe **DIAZ** called **JUAN** Valdez in order to provide a potential customer with 200 grams of heroin. I believe the pair complained about their drug businesses being slow. **DIAZ** gave an example of customers that used to buy 100 or 200 grams at a time that now only buy 20 or 30 grams at a time.

331. Between April 3, 2017 and April 5, 2017, **JUAN** Valdez used Target Telephone V to **speak** with **DIAZ** on telephone number (978) 566-8388 on several occasions. The purpose of the calls was to arrange a time to talk in person.

- On April 3, 2017 at approximately 4:23 p.m., **JUAN** Valdez called **DIAZ** and asked if he was “there.” **DIAZ** said he was not in the area and said, “If we can’t get together ... get together tomorrow but we need to sit and talk. I have something good for you.” **JUAN** Valdez agreed to talk with **DIAZ** tomorrow.
- On April 4, 2017 at approximately 2:19 p.m., **DIAZ** called **JUAN** Valdez and asked him if he was near Mattapan, MA. **DIAZ** said he was doing something regarding his health insurance because his wife was pregnant. **JUAN** Valdez said he was not in the area and again they agreed to speak later.
- On April 5, 2017 at approximately 1:00 p.m., **JUAN** Valdez called **DIAZ** and the pair agreed to meet outside by **DIAZ** old house. At approximately 1:25 p.m., the pair again spoke and agreed to meet over at “the house.”

332. About 40 minutes later, at approximately 1:40 p.m., surveillance officers observed a black Toyota Avalon (MA 7ZK-N50) parked in front of 115 Corinth St. in Providence, RI. **DIAZ** was seated in the driver’s seat. **JUAN** Valdez was seated in the front passenger seat and **CLAUDIO** Valdez was seated in the rear seat. The Valdez’s white Chevy Malibu (MA 4XN-751) was observed parked and unoccupied directly across from the Avalon. According to RI Department of Corrections records, 115 Corinth St. was **DIAZ**’s former residence. At approximately 1:49 p.m., **JUAN** and **CLAUDIO** Valdez left the black Avalon, returned to the white Malibu and departed the area. **DIAZ** and the black Avalon was followed by surveillance to 171 Reservoir Ave. in

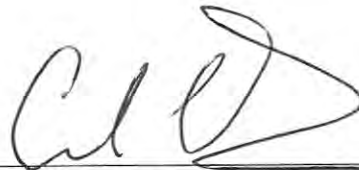
Providence. **DIAZ** parked in the parking lot located next to the residence and entered that residence. At approximately, 2:30 p.m., **DIAZ** was observed leaving 171 Reservoir Ave. with Hernandez-Torres. They entered the Avalon and drove away. A few minutes later, a Providence Police Officer operating a marked Cruiser, conducted a traffic stop. During the traffic stop, **DIAZ** provided the police officer with his MA driver's license and Hernandez-Torres provided her PA driver's license. During the stop, **DIAZ** informed the officer that Hernandez-Torres was pregnant.

333. As previously referenced in this affidavit, on February 8, 2017, a trash pull was conducted on items that were removed from the stash house at 87 Dulude Ave. by **CLAUDIO** Valdez and **CROTEAU**. In addition to a large quantity of cutting agents, a digital scale box, and latex gloves, two-kilogram wrappers were located in the trash. Each plastic kilo wrapper had a label affixed that was made from masking tape. Written on each label was the name "Canelo." **DIAZ** was referred to that name during intercepted conversations. **DIAZ** was the only person I know of in this investigation that any of the VALDEZ DTO members called "Canelo."

334. Based on all of these conversations, surveillance, and seizures I believe that **DIAZ** has conspired with **JUAN** Valdez and the VALDEZ DTO to distribute heroin and cocaine and that **DIAZ** has used a telephone in furtherance of those drug trafficking crimes.

III. CONCLUSION

335. I therefore suggest that there is probable cause to believe that the persons named in the applications for arrest warrants have all conspired, committed, and aided and abetted each other to commit controlled substance violations, have used telephone communication devices to commit those crimes and some have committed immigration offenses. All in violation of 21 U.S.C. §§ 841 (a)(1), (b)(1)(A) or (b)(1)(B) and 846; 18 U.S.C. § 2; and 8 U.S.C. 1326 §§ (a) and (b)(2). I further suggest that there is probable cause to search the premises identified in Attachment A for the evidence described in Attachment B. I finally suggest that there is probable cause to seize the motor vehicles listed in this affidavit which that were used to facilitate the commission of drug trafficking offenses.



COLIN WOODS
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me this 10th
day of April 2017, in
Providence, Rhode Island.



LINCOLN D. ALMOND, MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

ATTACHMENT A

34 Burnside Ave., Apartment 3F, Woonsocket, RI

34 Burnside Ave. is a five-family residential property that has tan vinyl siding and green shutters. The driveway to 34 Burnside Ave. is located to the left/south side of the residence and opens into a parking lot shared by the residences located to the left/south and north/right. The entrance to 34 Burnside Ave. is located on a porch that runs along the left/south side of the building. The number "34" is visible in close proximity to the entrance. Apartment 3F is located on the 3rd floor in the front of the building, facing Burnside Ave.

34 Burnside Ave., Basement Apartment, Woonsocket, RI

34 Burnside Ave., Woonsocket, RI is a five-family residential property that has tan vinyl siding and green shutters. The driveway to 34 Burnside Ave. is located to the left/south side of the residence and opens into a parking lot shared by the residences located to the left/south and north/right. The main entrance to 34 Burnside Ave. is located on a porch that runs along the left/south side of the building. The number "34" is visible in close proximity to the entrance. The basement apartment is located on the bottom floor of the residence.

88 Barrows St., Apartment #2, Providence, RI

88 Barrows St., Providence, RI is a two-family residential property that has tan vinyl siding and white trim. The driveway to 88 Barrows St. is located to the left/north side of the residence. The front door to 88 Barrows St. has the numbers "88" posted above the door. Apartment #2 is located on the second floor of the residence.

87 Dulude Ave., Apartment 1R, Woonsocket, RI

87 Dulude Ave., Woonsocket, RI is a six-family residential property that has white vinyl siding. The driveway to the residence is located to the right/south side of the residence. The front of the residence has the numbers "87" posted in plain view. Apartment 1R is located on the first floor of the building in the rear of the residence.

103/105 Woodbine St., Cranston, RI

103/105 Woodbine St., Cranston, RI is a two-family residence that has tan vinyl siding and white trim. The driveway to the residence is located on the left/south side of the residence. The residence has two distinct entrances. One entrance is located off a small concrete landing located on the north side of the building. The second entrance is located adjacent to the driveway on the south side of the residence. The apartment to be searched is accessed through the south side entrance.

137/139 Atlantic Ave., Providence, RI

137/139 Atlantic Ave., Providence, RI is a three story multi-family residence that is peach in color. The residence has white trim and front porches on all three levels. The main driveway to the residence is located on the right/east side of the residence. There is also a parking spot for a single vehicle located on the left/west side of the residence. The porch on the first floor has two doors. The door to the left depicts the number "139" above it. The door to the right depicts the number "137" above it. The apartment to be searched is number 139.

223 Massachusetts Ave., Providence, RI

223 Massachusetts Ave., Providence, RI is a single-family residence that is white in color. The driveway to the residence is located to the left/west of the residence. There is a solid fence approximately six feet in height that runs along the front of the property. The number "223" is located in close proximity to the front door of the residence.

35 DeSoto St., Apartment 2, Providence, RI

35 DeSoto St., Providence, RI is a three-family residence that is white in color. The physical structure is located on Harris Ave. but the driveway to the property is located on De Soto St. There is a detached two-car garage located behind the property of DeSoto St. Apartment #2 is located on the second floor of the residence.

ATTACHMENT B

Controlled substances including: heroin, fentanyl, cocaine, cocaine base and Percocet, OxyContin or other opioid pain medications;

Drug trafficking equipment including: drug presses, scales, packaging materials, cutting agents, or other drug paraphernalia;

Documents including:

- Drug ledgers or pay-owe sheets, lists of drug customers and drug suppliers, books, papers or notes containing names, addresses, telephone numbers of drug customers and drug suppliers, and receipts relating to narcotics trafficking;
- Bank statements, money transfer documents or other financial records establishing where the proceeds of drug trafficking are located;
- Identification cards and papers that would assist in determining the true identity of these offenders and assist in tracing assets;
- Identification cards and papers that constitute evidence of passport fraud and identity theft.
- Indicia of occupancy including documents such as bills, correspondence, rent receipts and any other document evidencing ownership or occupancy of the subject premises;
- Photographs relating to drug trafficking or establishing ownership and occupancy of the subject premises;

Electronic devices: such as cellular telephones or smartphones so called, computers, laptops, tablets, hard drives, thumb drives, and any other device or medium for the electronic storage of records, documents or photographs of the type described;

Cash in the form of U.S. Currency or other valuables which are the proceeds of narcotics trafficking; safety deposit box keys where the proceeds of drug trafficking might be stored;

Firearms; and

Any other property which constitutes evidence of the criminal offenses of distribution, possession with intent to distribute, and conspiracy to distribute controlled substances in violation of 21 U.S.C. §§ 841 and 846 or immigration offenses in violation of 8 U.S.C. § 1326 wherever located or hidden within the subject premises.

ATTACHMENT A

34 Burnside Ave., Apartment 3F, Woonsocket, RI

34 Burnside Ave. is a five-family residential property that has tan vinyl siding and green shutters. The driveway to 34 Burnside Ave. is located to the left/south side of the residence and opens into a parking lot shared by the residences located to the left/south and north/right. The entrance to 34 Burnside Ave. is located on a porch that runs along the left/south side of the building. The number "34" is visible in close proximity to the entrance. Apartment 3F is located on the 3rd floor in the front of the building, facing Burnside Ave.

34 Burnside Ave., Basement Apartment, Woonsocket, RI

34 Burnside Ave., Woonsocket, RI is a five-family residential property that has tan vinyl siding and green shutters. The driveway to 34 Burnside Ave. is located to the left/south side of the residence and opens into a parking lot shared by the residences located to the left/south and north/right. The main entrance to 34 Burnside Ave. is located on a porch that runs along the left/south side of the building. The number "34" is visible in close proximity to the entrance. The basement apartment is located on the bottom floor of the residence.

88 Barrows St., Apartment #2, Providence, RI

88 Barrows St., Providence, RI is a two-family residential property that has tan vinyl siding and white trim. The driveway to 88 Barrows St. is located to the left/north side of the residence. The front door to 88 Barrows St. has the numbers "88" posted above the door. Apartment #2 is located on the second floor of the residence.

87 Dulude Ave., Apartment 1R, Woonsocket, RI

87 Dulude Ave., Woonsocket, RI is a six-family residential property that has white vinyl siding. The driveway to the residence is located to the right/south side of the residence. The front of the residence has the numbers "87" posted in plain view. Apartment 1R is located on the first floor of the building in the rear of the residence.

103/105 Woodbine St., Cranston, RI

103/105 Woodbine St., Cranston, RI is a two-family residence that has tan vinyl siding and white trim. The driveway to the residence is located on the left/south side of the residence. The residence has two distinct entrances. One entrance is located off a small concrete landing located on the north side of the building. The second entrance is located adjacent to the driveway on the south side of the residence. The apartment to be searched is accessed through the south side entrance.

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137/139 Atlantic Ave., Providence, RI is a three story multi-family residence that is peach in color. The residence has white trim and front porches on all three levels. The main driveway to the residence is located on the right/east side of the residence. There is also a parking spot for a single vehicle located on the left/west side of the residence. The porch on the first floor has two doors. The door to the left depicts the number "139" above it. The door to the right depicts the number "137" above it. The apartment to be searched is number 139.

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- Bank statements, money transfer documents or other financial records establishing where the proceeds of drug trafficking are located;
- Identification cards and papers that would assist in determining the true identity of these offenders and assist in tracing assets;
- Identification cards and papers that constitute evidence of passport fraud and identity theft.
- Indicia of occupancy including documents such as bills, correspondence, rent receipts and any other document evidencing ownership or occupancy of the subject premises;
- Photographs relating to drug trafficking or establishing ownership and occupancy of the subject premises;

Electronic devices: such as cellular telephones or smartphones so called, computers, laptops, tablets, hard drives, thumb drives, and any other device or medium for the electronic storage of records, documents or photographs of the type described;

Cash in the form of U.S. Currency or other valuables which are the proceeds of narcotics trafficking; safety deposit box keys where the proceeds of drug trafficking might be stored;

Firearms; and

Any other property which constitutes evidence of the criminal offenses of distribution, possession with intent to distribute, and conspiracy to distribute controlled substances in violation of 21 U.S.C. §§ 841 and 846 or immigration offenses in violation of 8 U.S.C. § 1326 wherever located or hidden within the subject premises.