

AUSAs: Maggie Lynaugh, Adam Sowlati

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

24 MAG 851

UNITED STATES OF AMERICA

COMPLAINT

v.

Violations of 21 U.S.C. §§ 841, 846; 18
U.S.C. § 2

EDWARD EUSTATE JIMENEZ,
a/k/a "Chino," and
WILIANYI ALMANZAR POLANCO,

COUNTY OF OFFENSE:
NEW YORK

Defendants.

SOUTHERN DISTRICT OF NEW YORK, ss.:

MOISES WALTERS, being duly sworn, deposes and says that he is a Special Agent with Drug Enforcement Administration ("DEA"), and charges as follows:

COUNT ONE
(Conspiracy to Distribute Narcotics)

1. From at least in or about September 2023 through at least in or about February 2024, in the Southern District of New York and elsewhere, EDWARD EUSTATE JIMENEZ, a/k/a "Chino," and WILIANYI ALMANZAR POLANCO, the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that EDWARD EUSTATE JIMENEZ, a/k/a "Chino," and WILIANYI ALMANZAR POLANCO, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Possession with Intent to Distribute Narcotics)

4. On or about February 26, 2024, in the Southern District of New York and elsewhere, EDWARD EUSTATE JIMENEZ, a/k/a "Chino," and WILIANYI ALMANZAR POLANCO, the defendants, knowingly and intentionally distributed and possessed with intent to

distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and aided and abetted the same.

5. The controlled substances involved in the offense were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A);
Title 18, United States Code, Section 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

6. I am a Special Agent with DEA, currently assigned to the El Dorado Task Force, which focuses on combatting drug trafficking and money laundering. I have been a Special Agent with DEA for approximately 12 years. I have been personally involved in this investigation. This affidavit is based on my involvement in this investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Background

7. Since at least in or about September 2023, members of law enforcement have been investigating a network of drug traffickers who, among other things, have been distributing large quantities of counterfeit prescription drugs using a mail-order system. The drugs distributed include pills colored and pressed to look like, among other things, prescription Oxycontin, oxycodone, and Adderall, but that are, in fact, counterfeit pills laced with fentanyl and methamphetamine. Such counterfeit pills are extremely dangerous because they are made to appear identical to legitimate, prescription pharmaceutical pills, and the user is thus often unaware that they may contain lethal amounts of controlled substances.

Mail Order Purchases of Pills by Law Enforcement

8. Based on discussions with other law enforcement officers, I have learned, among other things, the following:

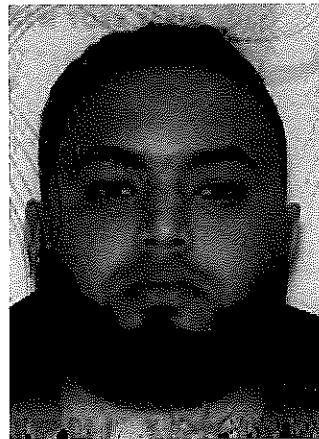
a. Beginning in or about September 2023, the user of a particular encrypted messaging application number (the "Encrypted Application Number") agreed to send pills in exchange for payment to an undercover law enforcement officer (the "UC") posing as a drug customer. Those pills were sent to the UC in multiple United States Postal Service ("USPS") packages. Postal records show that packages were shipped from post offices located, among other places, in the Bronx. Laboratory results show that the pills from the packages shipped from the Bronx tested positive for, among other things, fentanyl.

b. In or about February 2024, the UC again purchased pills from the user of the Encrypted Application Number. The UC received two packages (the “Packages”) with over 50 pills in each of the Packages. The pills in the Packages are currently being tested for the presence of narcotics.

c. Postal records show that the Packages came from a certain post office (the “Post Office”) in the Bronx, and were shipped in or about February 2024. The Packages were sent from a self-service kiosk at the Post Office that takes a photograph of the user of the kiosk at approximately the moment the user scans and deposits a package into the kiosk. A photograph was taken of the sender of the Packages, which is reproduced below:



d. The below is a copy of the driver’s license photograph of EDWARD EUSTATE JIMENEZ, a/k/a “Chino,” the defendant. From my comparison of the photographs and my personal observations of JIMENEZ, I believe that JIMENEZ appears to be the person who sent the Packages:



9. Based on discussions I have had with a law enforcement officer who has reviewed postal records and photographs from postal kiosks located in the vicinity of the Bronx, I know,

among other things, that EDWARD EUSTATE JIMENEZ, a/k/a “Chino,” the defendant, appears to have sent over 180 USPS packages since in or about January 20, 2024, including approximately 80 packages that were sent from the Post Office. On at least one occasion, he was joined by an individual who appears to be WILIANYI ALMANZAR POLANCO, the defendant.

The Arrest of JIMENEZ and POLANCO

10. Based on discussions I have had with law enforcement officers who have interviewed witnesses and conducted surveillance, including surveillance of a building (the “Building”) located in the Washington Heights neighborhood of Manhattan, I have learned, among other things, the following:

a. EDWARD EUSTATE JIMENEZ, a/k/a “Chino,” the defendant, appears to live in an apartment (the “Apartment”) in the Building.

b. Both JIMENEZ and WILIANYI ALMANZAR POLANCO, the defendants, have paid rent for the Apartment and have keys to the Apartment.

c. The Apartment is a basement unit that is accessed through a black, gated door located to the side of the main entrance to the basement of the Building (the “Basement Entrance”).

11. Based on my personal involvement in this investigation and discussions I have had with other law enforcement officers who conducted surveillance, including surveillance of WILIANYI ALMANZAR POLANCO and EDWARD EUSTATE JIMENEZ, a/k/a “Chino,” the defendants, I have learned, among other things, the following:

a. At approximately 2:45 p.m. on February 26, 2024, POLANCO entered the Basement Entrance.

b. Approximately one hour later, at approximately 3:45 p.m., JIMENEZ and POLANCO exited¹ the Basement Entrance, with JIMENEZ carrying at least one large black trash bag. They then approached a vehicle (the “Vehicle”). JIMENEZ placed the trash bag in the backseat of the Vehicle and entered the front passenger seat of the Vehicle. POLANCO entered the driver’s seat.

c. At approximately 4:05 p.m., POLANCO parked the Vehicle outside of the Post Office. JIMENEZ then exited the Vehicle and removed a black trash bag (“Bag-1”) from the back seat of the Vehicle. POLANCO remained in the Vehicle.

¹ Based on my discussions with law enforcement officers who conducted a post-arrest, post-*Miranda* interview of POLANCO, I know that POLANCO told officers that he had visited the Apartment solely to use the restroom, but also that he rented the Apartment.

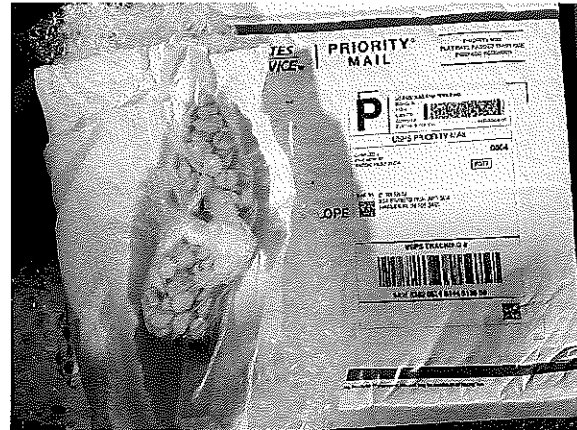
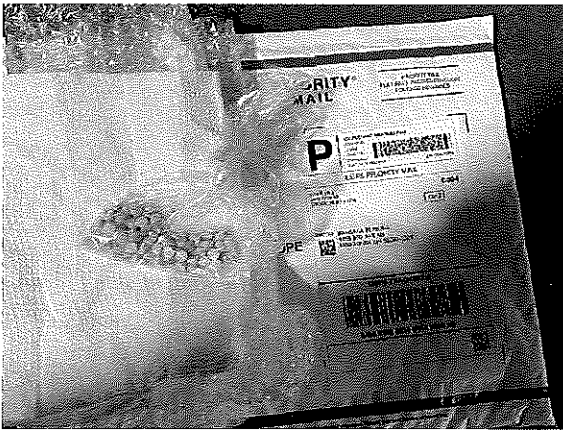
d. JIMENEZ then entered the Post Office. At approximately 4:10 p.m., law enforcement officers approached and arrested JIMENEZ. At the time of his arrest, JIMENEZ was standing in front of a self-service kiosk, scanning parcels he had pulled out of Bag-1.²

e. Around that same time, law enforcement officers placed POLANCO, who remained waiting in the Vehicle, under arrest and observed that, inside the back seat of the Vehicle was another black trash bag (“Bag-2”).

f. The appearance of Bag-1 and Bag-2 was consistent with the appearance of the bag(s) JIMENEZ had carried out of the Basement Entrance before entering the Vehicle.

The Searches

12. Based on my personal participation in this investigation, I know that, following the arrests of EDWARD EUSTATE JIMENEZ, a/k/a “Chino,” and WILIANIYI ALMANZAR POLANCO, the defendants, on or about February 26, 2024, law enforcement officers searched Bag-1 and Bag-2 pursuant to a search warrant issued by the Honorable Sarah Netburn, United States Magistrate Judge. During that search, law enforcement officers observed more than 35 priority mail packages, each of which contained a quantity of what appeared to be counterfeit prescription pills. In total, approximately 3,000 pills were located in the packages contained in Bag-1 and Bag-2. The contents of two of the priority mail packages, containing what appears to be counterfeit oxycodone and counterfeit Adderall, are pictured below.




13. Based on my personal participation in this investigation as well as conversations I have had with other law enforcement officers, I know that also following the arrests of EDWARD EUSTATE JIMENEZ, a/k/a “Chino,” and WILIANIYI ALMANZAR POLANCO, the defendants, law enforcement officers searched the Apartment pursuant to a search warrant issued by the Honorable Sarah Netburn, United States Magistrate Judge. During that search, law enforcement officers observed the following, as pictured, in part, below:

² Based on my discussions with law enforcement officers who conducted a post-arrest, post-*Miranda* interview of JIMENEZ, I know that JIMENEZ told law enforcement officers that he did not know what was in the packages he was shipping out and was told there was medicine in the packages.




- a. Approximately 100,000 counterfeit pills that appear to be colored and pressed to imitate, among other things, prescription Oxycontin, oxycodone, Adderall, and Xanax.
- b. A “kilo press,” which I know from my training and experience to be a device used to press powdered narcotics into kilogram-weight bricks.
- c. Over 2,000 USPS priority mail envelopes that appear to be unused.
- d. Bags containing what appear to be shipping receipts.
- e. Many of the materials found in the Apartment, as described, in part, above, were contained in bags and containers stored in the Apartment, and other materials were found inside of what appeared to a concealed compartment, or “trap,” in a chair.
- f. Although laboratory testing is pending, preliminary field tests reveal that a sample of each of the different types of pills seized has tested positive for the presence of fentanyl or methamphetamine. In particular, a sample of each of the blue, white, yellow and green pills seized (and pictured above) has field tested positive for fentanyl; a sample of the orange pills (pictured above) has field tested positive for methamphetamine.

WHEREFORE, I respectfully request that EDWARD EUSTATE JIMENEZ, a/k/a "Chino," and WILIANYI ALMANZAR POLANCO, the defendants, be imprisoned or bailed, as the case may be.



MOISES WALTERS
Special Agent
Drug Enforcement Administration

Sworn to before me
this 27th day of February, 2024



THE HONORABLE GARY STEIN
United States Magistrate Judge
Southern District of New York