

Approved: Alison Moë / Jacob Warren
ALISON MOE / JACOB WARREN
Assistant United States Attorneys

Before: THE HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA :
:
- v. - :
:
RICHARD LAUGEL, :
:
Defendant. :
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SEALED COMPLAINT

Violations of
26 U.S.C. §§ 5861(d) & 5871;
18 U.S.C. §§ 922(k); and
21 U.S.C. §§ 841(a)(1), (b)(1)(C), &
841(b)(1)(E).

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

SHELDON R. CORCHADO, being duly sworn, deposes and says that he is a Task Force Officer with the Department of Homeland Security, Homeland Security Investigations (“HSI”), and charges as follows:

COUNT ONE
(Unlawful Possession of Firearm Silencers)

1. From at least in or about May 2018, in the Southern District of New York and elsewhere, RICHARD LAUGEL, the defendant, knowingly did possess firearms, as defined in Title 26, United States Code, Section 5845(a)(7), which were not registered to him in the National Firearms Registration and Transfer Record, to wit, LAUGEL possessed firearm silencers at his residence in the Bronx, New York, which devices were not registered to him.

(Title 26, United States Code, Sections 5861(d) and 5871.)

COUNT TWO
(Possession with Intent to Distribute Narcotics)

2. From at least in or about October 2017, up to and including in or about January 2018, in the Southern District of New York and elsewhere, RICHARD LAUGEL, the defendant, intentionally and knowingly did distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances involved in the offense were mixtures and substances containing a detectable amount of cocaine, and mixtures and substances containing a detectable amount of alprazolam, in violation of 21 U.S.C. §§ 841(b)(1)(C) and 841(b)(1)(E).

(Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and 841(b)(1)(E).)

COUNT THREE
(Possession of a Defaced Firearm)

4. In or about May 2018, in the Southern District of New York and elsewhere, RICHARD LAUGEL, the defendant, knowingly did possess firearms which had the importer's and manufacturer's serial number removed, obliterated, and altered, to wit, two defaced Glock handguns, which had previously been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code Section 922(k).)

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

5. I am a Task Force Officer with HSI, and I have been involved in the investigation of the above-described offenses. The information contained in this Complaint is based upon my personal knowledge and participation in this investigation, as well as on my conversations with other law enforcement agents 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 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. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

a. As set forth in greater detail below, since in or about October 2017, HSI agents have been investigating the residence of RICHARD LAUGEL, the defendant ("the LAUGEL Residence") in connection with an illegal operation to distribute controlled substances. Based on my review of information contained in law enforcement databases, I have learned that on or about March 6, 2016, RICHARD LAUGEL was indicted in Bronx County Criminal Court for first degree arson and attempted murder in the second degree, arising from the use of an explosive device. LAUGEL is currently released on bail, and the LAUGEL Residence is on file in law enforcement databases as LAUGEL's primary residence.

6. Based on my review of records from PayPal for an account associated with an individual (“CC-1”) (the “PayPal Account”), I have learned, among other things, that:

- a. The PayPal Account is subscribed to CC-1 at the LAUGEL Residence.
- b. On or about November 1, 2016, the PayPal Account made a purchase from the vendor “TabletPresses.net.” In the subject line of the transaction, the vendor listed: “3 KG - Microcrystalline Cellulose NF, Ph.Eur, JP - 100% pure tableting excipient.” Based on my training, experience, and participation in this investigation, I know that microcrystalline cellulose is a binding ingredient used for making pill tablets.

7. Based on my conversations with an officer with Customs and Border Protection (“CBP”), as well as my review of CBP records, I have learned the following, among other things:

- a. CBP logs all packages entering the United States from abroad. Logs of these shipments include the name and address of the recipient, the shipper’s address, and the contents of the package, as reflected in the customs declaration forms.
- b. On or about March 14, 2018, a package addressed to CC-1 at the LAUGEL Residence was logged entering the United States. The shipper was listed as an address in China. The customs declarations forms stated that the package contained “cellophane bags.” Based on my training and experience, I know that cellophane bags are used to package narcotics for distribution.
- c. On or about March 19, 2018, a package addressed to RICHARD LAUGEL, the defendant, at the LAUGEL Residence was logged entering the United States. The shipper was listed as an address in Canada. The customs declarations forms stated that the package contained “microcrystalline cellulose.”
- d. On or about April 24, 2018, a package (“Package-1”) addressed to LAUGEL at the LAUGEL Residence was logged entering the United States. The shipper was listed as an address in China. The customs declarations forms stated that the package contained a “drill press machine.” A CBP officer x-rayed the package and opened it, pursuant to CBP’s border search authority. Inside Package-1 were three pill press dies. Based on my training, experience, and participation in this investigation, I know that a pill press is a machine used to manufacture pills by compressing loose chemical powder into pills. A pill press die is a machine part used in a pill press to mark the pills with a brand or imprint. The three pill press dies in Package-1 were for “Xanax”—in other words, these dies were designed to be used in a pill press, to mark pills “Xanax.” Xanax is the brand name for Alprazolam, a Schedule IV controlled substance.

8. On or about May 16, 2018, the Honorable Barbara C. Moses, United States Magistrate Judge for the Southern District of New York, authorized a search warrant for the LAUGEL Residence.

9. On or about May 22, 2018, HSI agents, in coordination with the New York City Police Department (“NYPD”), and an explosives expert from the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) (the “Explosives Expert”), executed the May 16, 2018 Search Warrant.¹ Based on my personal participation in this investigation and my conversations with other law enforcement officers, I have learned, among other things, the following:

a. CC-1 was inside the LAUGEL Residence. CC-1 stated that CC-1 shares the LAUGEL Residence with RICHARD LAUGEL, the defendant, and that no other adults reside at the LAUGEL Residence. CC-1 further stated that LAUGEL had left the LAUGEL Residence the night before.

b. During the course of the search of the residence pursuant to the May 16, 2018 Search Warrant, law enforcement agents recovered, among other things: a silencer; component parts to a firearm; two plastic molds which, based on my training and experience, appear to be designed for use in forming the lower receiver of a handgun; coloring agents that appear, based on my training and experience, to be consistent with the type used to dye pills; empty gel capsules; and six unopened packages addressed to LAUGEL. Some of the packages were international packages with a return address in China. The packages contained: (1) plastic molds that, based on my training and experience, appear to be designed for use in forming the lower receiver of a handgun; (2) a wrench of the type I know to be used to assemble an AR-15 rifle; (3) the top slide of a Glock pistol; (4) the handle of an AR-15 rifle; (5) a teddy bear. Concealed inside the teddy bear were small vials of approximately 30 grams of a white powdery substance that field tested positive for the presence of cocaine.

c. During the course of the search of the garage (the “Garage”) located at the rear of the LAUGEL Residence, law enforcement agents recovered, among other things: a Sig Sauer pistol, two Glock pistols with defaced serial numbers, a grenade launcher, firearms silencers,² plastic molds which, based on my training and experience, appear to be designed for use in forming the lower receiver of a handgun, firearm barrels that appear to be designed for compatibility with silencers, component parts for silencers, drill press and milling machines of the variety that I know to be used for manufacturing firearms, a high capacity magazine for a firearm, ammunition, and a floor safe (the “Floor Safe”). The Floor Safe in the Garage was open upon entry to the Garage and the Explosives Expert arrived on scene and examined the contents of the Floor Safe. Based on my conversations with the Explosives Expert, I have learned that the safe contained the following, among other things: an AR-15 rifle, and ammunition.

¹ The search warrant authorized a search for fruits and instrumentalities of violations of Title 21, United States Code, Sections 841 (manufacturing, distributing, and dispensing or possessing with intent to distribute or dispense controlled substances), 846 (conspiracy to possess and possess with intent to distribute a controlled substance); and 331 (adulteration or misbranding of a drug in interstate commerce). After an initial sweep and search of the LAUGEL Residence and the Garage, law enforcement obtained a second warrant, authorized by the Honorable Katharine H. Parker, United States Magistrate Judge for the Southern District of New York, to search the LAUGEL Residence for evidence of additional crimes relating to firearms and explosives.

² The silencers did not have serial numbers and appeared to be self-made, and not commercially manufactured. Based on my conversations with a Special Agent from ATF, I have learned that a silencer cannot be registered with ATF without a serial number.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of RICHARD LAUGEL, the defendant, and that he be imprisoned or bailed, as the case may be.

S/S

SHELDON R. CORCHADO
Task Force Officer
Homeland Security Investigations

Sworn to before me by telephone on this
22nd day of May 2018

Katharine H. Parker

THE HONORABLE KATHARINE H. PARKER
CHIEF UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK * *Facetime*