

Approved: NI QIAN  
NI QIAN  
Assistant United States Attorney

Before: HONORABLE GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
Southern District of New York

**21 MAG 4473**

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UNITED STATES OF AMERICA :  
 : COMPLAINT  
 :  
 - v. - : Violation of 21 U.S.C.  
 : § 841  
 CLYDE HALL, :  
 a/k/a "Peter," :  
 :  
 Defendant. : County of Offense:  
 : New York  
 :  
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STATE OF NEW YORK ) ss:  
SOUTHERN DISTRICT OF NEW YORK )

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

COUNT ONE  
(Narcotics Distribution)

1. On or about April 24, 2021, in the Southern District of New York and elsewhere, CLYDE HALL, a/k/a "Peter," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and did aid and abet the same.

2. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).)

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

3. I am a Special Agent with the DEA and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating 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.

4. Based on my participation in this investigation and my conversations with other law enforcement officers, I have learned, in substance and in part, the following:

a. On or about April 23, 2021, a confidential source acting at the direction of law enforcement ("CS-1")<sup>1</sup>, exchanged a series of phone calls with an individual subsequently identified as CLYDE HALL, a/k/a "Peter," the defendant. During these recorded phone calls, HALL and CS-1 discussed, in sum and substance, the details of a narcotics deal that was supposed to happen the next day. Specifically, HALL told CS-1, in substance and in part, that CS-1 will come to Hall's apartment ("Hall's Apartment") the next day with the "paper" for "six," and Hall will give CS-1 "six," and then Hall and CS-1 will wait together in Hall's Apartment until another "five" gets dropped off later on the same day, and then give the paper for the "five." Based on my conversations with CS-1, CS-1 understood that HALL's use of "six" and "five" referred to the number of kilograms of

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<sup>1</sup> CS-1 is a confidential source working with the DEA. CS-1 has been providing information to law enforcement for approximately 13 years in exchange for financial and immigration benefits. Information provided by CS-1 has proven reliable and has been corroborated by, among other things, events and individuals independently observed by law enforcement, and has led to multiple seizures of narcotics and arrests of narcotics traffickers. Information provided by CS-1 in this case has proven reliable and has been corroborated by, among other things, recordings and law enforcement surveillance.

narcotics that HALL agreed to sell to CS-1, and "paper" referred to the money for the purchase of the narcotics.

b. On or about April 24, 2021, HALL called CS-1. During this recorded phone call, CS-1 told HALL, in substance and in part, that CS-1 will arrive at HALL's building in approximately one hour.

c. At approximately 9:30 a.m., CS-1, driving a vehicle, arrived in front of the building ("Building-1") of Hall's Apartment in Manhattan, New York. Upon arrival, CS-1 called HALL. During this recorded phone call, HALL agreed to come out of Building-1 to meet CS-1.

d. Law enforcement officers conducting surveillance in the vicinity of Building-1 observed HALL exit Building-1 and enter CS-1's vehicle. During the recorded meeting inside CS-1's vehicle, HALL agreed, in substance and in part, to first bring one piece out to CS-1, after which CS-1 would bring the money intended for purchasing narcotics to Hall's Apartment. Law enforcement officers subsequently observed HALL exit CS-1's vehicle and reenter Building-1.

e. Shortly thereafter, law enforcement officers observed HALL exit Building-1 again, this time with a gray bag, and enter CS-1's vehicle. Law enforcement officers then approached and arrested HALL in CS-1's vehicle and seized the gray bag, which contained a condensed chunky white substance that field-tested positive for cocaine.

f. Subsequent to the arrest of HALL, pursuant to a search warrant authorized by the Honorable James L. Cott, Magistrate Judge of the Southern District of New York, law enforcement officers searched Hall's Apartment. During this search, law enforcement officers found, among other things, a gray duffel bag containing five packages which weighed a total of approximately six kilograms including packaging. The substance in one of these packages field-tested positive for cocaine. In total, the six packages seized from HALL and Hall's Apartment weigh approximately seven kilograms, including packaging.

5. Based on my participation in this investigation and my conversations with other law enforcement officers, I have learned that CLYDE HALL, a/k/a "Peter," the defendant, was previously sentenced in 2010 to a term of 20 years' imprisonment. HALL is still currently serving that term of imprisonment, and the Bureau of Prisons ("BOP") recently placed

HALL on home confinement pursuant to its authority under the Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act").

WHEREFORE, I respectfully request that CLYDE HALL, a/k/a "Peter," the defendant, be imprisoned or bailed, as the case may be.

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TODD ROSKOSKY  
Special Agent  
Drug Enforcement Administration

Sworn to me by telephone, this  
26th Day of April, 2021

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THE HONORABLE GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK