

AFFIDAVIT OF SPECIAL AGENT ORNELLO ARLATI

I, Special Agent Ornello Arlati, being sworn, depose and state as follows in support of my application for a complaint charging that, on or about September 19, 2023, in Revere, Massachusetts, Abdelouahab ADEL committed various violations of federal law including: (1) possession with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1); (2) possession of a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c); and (3) felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1).

INTRODUCTION

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since July 2004. I attended the FBI Academy, where I received training in investigating various federal violations. I am currently assigned to the Boston Field Office of the FBI and work on the Joint Terrorism Task Force (“JTTF”). Prior to working counter-terrorism matters, I was assigned to the Organized Crime Task Force investigating several federal violations, including money laundering, drug trafficking, human trafficking, corruption, identity fraud, and firearms trafficking. Based on my training and experience as a Special Agent, I am familiar with federal narcotics and firearms laws. As a result of my training and experience, including information provided by other federal agents with applicable knowledge, I am familiar with the tactics, methods, and techniques used by individuals engaging in drug and firearms trafficking. As part of my job duties, I have participated in the execution of multiple federal search warrants. In addition, I have conducted numerous investigations

involving the use of the Internet, smart phones, computers, and social media to further criminal activity.

2. Since becoming a Special Agent with the FBI, I have participated in investigations of narcotics trafficking and money laundering, and among other things, have conducted or participated in physical surveillance, the execution of search warrants, debriefings of subjects, witnesses, and informants, and participated in consensually recorded conversations and meetings. Through my training, education, and experience, I am familiar with the manner in which illegal drugs are transported, stored, and distributed, and with the methods of payment for such drugs.

3. I have written and/or participated in the execution of numerous search warrants resulting in the seizures of large quantities of controlled substances, packing implements, other paraphernalia involved in the manufacture and distribution of controlled substances, large amounts of United States currency, ledger books, bank records, telephone books, receipts, drug customer lists, and other documents relating to the manufacturing, transportation, ordering, purchasing, and distribution of controlled substances. I have participated in all aspects of drug investigations including conducting surveillance, executing searches pursuant to court-ordered search warrants, and conducting arrests. As a result of my assignments, I have received training in the field of narcotics investigation and enforcement.

4. Based upon my training and experience, I am familiar with the methods of operation employed by narcotics traffickers operating at the local, state, national, and international levels, including those involving the distribution, storage, and transportation of narcotics and the collection of monies that constitute the proceeds of narcotics trafficking activities.

5. The information contained in this affidavit is based on my review of records, my training and experience, and information obtained from other investigators and witnesses including information obtained during an investigation conducted by members of the JTTF and other law enforcement officers. The word “agent” or “investigator” is used in this affidavit for all federal, state, and local law enforcement officers. The dates and times in this affidavit are approximate. This affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint charging ADEL with: (1) possession with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1); (2) possession of a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c); and (3) felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1).

6. Because this affidavit is submitted for the limited purpose of establishing probable cause for the issuance of the requested criminal complaint for ADEL, I have not presented every fact learned during the investigation or recounted every investigative technique employed. Rather, I am only setting forth information necessary to support probable cause for the issuance of a complaint.

BACKGROUND

7. Based on a review of records, I am aware that ADEL was convicted in or around 2018 in a single case of various state crimes, each of which carried a potential sentence in excess of one year, including: (1) Home Invasion, for which ADEL received a sentence of 2 years’ probation; (2) Armed Robbery, for which ADEL received a sentence of 2 years’ probation; and (3) Assault and Battery with a Dangerous Weapon, for which ADEL received a sentence of imprisonment of 2 years and 6 months. Based on these convictions, I am aware that ADEL was a prohibited person and could not possess a firearm under federal law.

8. On September 19, 2023, ADEL was stopped by investigators in Revere, Massachusetts. A loaded firearm and a distributable amount of controlled substances were seized from ADEL. Prior to this stop, investigators had received information from a Confidential Human Source (“CHS”) that the CHS had observed ADEL possessing what appeared to be a pistol in or about mid-August 2023 and that ADEL was involved in the street-level trafficking of controlled substances. The investigators were aware that ADEL was prohibited under federal law from possessing a firearm. The investigators also were aware that ADEL did not have authority to possess a firearm under Massachusetts state law. Investigators were further aware that ADEL was on pretrial release for a pending case in Massachusetts state court involving various charges, including Armed Robbery. The CHS had provided accurate information to law enforcement in a past investigation.

9. On September 19, 2023, shortly before stopping ADEL, investigators obtained evidence (including surveillance by investigators) that ADEL had conducted a hand-to-hand drug deal in which he sold a small bag of what appeared to be cocaine. Investigators also obtained evidence that, during this drug deal on September 19, ADEL had displayed what appeared to be a handgun. Given the evidence that ADEL had just conducted a hand-to-hand drug deal while armed with what appeared to be a handgun, investigators stopped ADEL at the Target Shopping Center in Revere. Investigators conducted a pat-frisk of ADEL. A firearm was subsequently located in a bag strapped around ADEL’s body. The firearm was identified as a Glock-style 9mm semiautomatic pistol with a TARAN Tactical Combat Master slide and a weapon mounted laser light. The pistol was loaded with 18 rounds of 9mm ammunition. Investigators have reviewed the firearm and have determined that it was not manufactured in Massachusetts and therefore

would have traveled in interstate or foreign commerce prior to its possession by ADEL in Revere on or about September 19, 2023.


10. Other evidence was recovered from the same bag that held the firearm. Investigators recovered three plastic bags, which contained a white powdery substance consistent with cocaine, a controlled substance, and which had a cumulative weight of approximately 12.3 grams. The substance was field-tested and tested positive for the presence of cocaine. Based on my training and experience, the three bags are consistent with the street-level trafficking of cocaine. Investigators also recovered approximately \$468 in United States currency from the same bag.

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CONCLUSION


11. Based on all of the foregoing, there is probable cause to believe that Abdelouahab ADEL has committed the following offenses: (1) possession with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1); (2) possession of a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c); and (3) felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1).

Sworn to under the pains and penalties of perjury,



ORNELLO ARLOTTI
Special Agent
Federal Bureau of Investigation

Electronically sworn to and subscribed telephonically in accordance with Federal Rule of Criminal
Sep 22, 2023
Procedure 4.1 on _____, 2023.



HONORABLE JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE