

**AFFIDAVIT OF GINA GALANTINO IN SUPPORT OF CRIMINAL COMPLAINT**

I, Gina Galantino, state:

**Introduction and Affiant Background**

1. I am a Special Agent with the federal Bureau of Alcohol, Tobacco, Firearms and Explosive (“ATF”) and have been so employed since 2020. I am currently assigned to the Boston Field Office. I am a graduate of the Federal Law Enforcement Training Center, where I completed ATF Special Agent Basic Training and the Criminal Investigator Training Program. During the course of my law enforcement career, I have participated in the execution of state and federal search and/or arrest warrants for violations of firearms and controlled substance laws.

2. As a Special Agent for ATF, some of my duties include conducting criminal investigations into cases of illegal possession/transfer of firearms, firearms trafficking, and drug trafficking. Through my training, knowledge, and experience, I have become familiar with the habits, methods, routines, practices, and procedures commonly employed by persons engaged in the illegal use and trafficking of firearms and controlled substances and the unlawful use or possession of firearms. I have been the affiant on affidavits in support of federal search warrants and arrest warrants. I have participated in and performed surveillance and made arrests of firearms and narcotics traffickers who utilize their electronic devices and/or computer equipment to further their illegal activity. During the course of my professional experience, I have interviewed numerous defendants, witnesses, victims, confidential informants, and other police officers regarding the illegal use and trafficking of firearms and controlled substances and the unlawful use or possession of firearms. As a result of my training and experience, and information provided to me by other law enforcement officers, I have an understanding of the various roles played by individuals or

groups involved in the trafficking of controlled substances and firearms. I have interviewed admitted drug traffickers, drug users, informants, cooperating defendants, and local, state, and federal law enforcement officers regarding the manner in which drug traffickers distribute, obtain, finance, store, manufacture, transport, and distribute illegal drugs. As such, I am familiar with the methods, routines, and practices of individuals involved in the use, sale, and trafficking of narcotics, including those involving purchasing, manufacturing, storing, and distributing controlled substances, the collection and laundering of illegal proceeds, and the efforts of persons involved in such activities to avoid detection by law enforcement. I am also familiar with the terminology and slang commonly employed by drug traffickers. I have observed and examined numerous types of controlled substances and I am familiar with the packaging, pricing structure, distribution methods, and street jargon associated with their sale and use. I have also encountered and become familiar with the various tools, methods, trends, and paraphernalia used by drug traffickers and trafficking organizations in their efforts to import, conceal, manufacture, and distribute controlled substances.

3. Based on my training and experience as an ATF Special Agent, I am familiar with federal firearms and controlled substances laws. In this regard, I know that it is a violation of Title 21, United States Code, Section 846 to conspire to distribute and to possess with intent to distribute controlled substances. I submit this affidavit in support of an application for a criminal complaint alleging that starting no later than September 2021 and continuing through at least December 2021, David Avalo, Joan Avalo-Quezada, Victor Pimentel, Krystin Mathewson, Jacob Lyford, Kayla Tasker, Amanda Lapointe and Michael St. Pierre conspired to distribute and to possess with intent to distribute controlled substances, in violation of Title 21, United States

Code, Section 846 (the “Target Offense”). As set forth below, there is probable cause to believe that the above listed defendants have committed the Target Offense.

4. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other investigators and witnesses. This affidavit is submitted for the limited purpose of establishing probable cause for the issuance of the requested criminal complaint. Accordingly, I have not included each and every fact known to me and other investigators involved in this investigation.

### **PROBABLE CAUSE**

#### ***David Avalo’s Transfer of His Maine Drug Operations to Joan Avalo***

5. On or about February 14, 2021, David Avalo was arrested on state charges based on a shooting that occurred in Salem, MA. Avalo was subsequently convicted of various state charges related to this shooting, including assault with intent to murder. On or about August 19, 2021, while David Avalo was being held pretrial, he communicated in a recorded jail call with his brother Joan Avalo-Quezada (“Avalo”) and with Victor Pimentel. Joan Avalo informed David Avalo that he was with “Chino” on the call. Pimentel was known to investigators prior to this call and investigators were aware that he is commonly referred to as “Chino” and “Chi” by his associates. In the call, Pimentel asked about David Avalo’s “crib up top” – a reference to David Avalo’s drug trafficking operation in Maine. David Avalo stated that “that shit’s just sitting there” and that “it’s looking real nice too ... I just called up there not long ago.”

6. Pimentel responded that “yeah you gotta see what’s up ... see if n\*\*\*\*s can rent that crib out for a little bit you know.” Pimentel was seeking to temporarily take over David Avalo’s drug distribution operation in Maine by paying David Avalo. On this point, Pimentel

later stated: "... Let me hold down the crib and I got you." David Avalo responded that he would have his girlfriend transfer the necessary information for the two to be able to take over the drug trafficking operation: "I'm gonna have my bitch slide you the information and shit and just go there and hold that." Joan Avalo subsequently told David Avalo: "Yeah Bro ... just have her swing that" – Joan Avalo was confirming that David Avalo's girlfriend would send them information as to the contacts for the operation in Maine. David Avalo replied: "Yeah, she gonna swing that." During the call, David Avalo provided the telephone number for his girlfriend so that the two could contact her. David Avalo noted: "Ayo, that's my bitch [referencing the phone number being his girlfriend's number] ... she's gonna put you on and shit n\*\*\*a ... Yo, I need half of all that too n\*\*\*a" – David Avalo expected half of the proceeds from the ongoing conspiracy. He reiterated the point with both Pimentel and Joan Avalo: "On dead dogs, I need half of all that ... n\*\*\*\*s is up you heard?" David Avalo also reiterated that he would have his girlfriend provide them with the necessary contact information to take over the operation in Maine.

7. Joan Avalo was arrested by BPD officers on or about December 14, 2021, as discussed more fully below. Avalo was arrested with a significant amount of powder fentanyl, as well as cocaine. During the arrest, Avalo attempted to conceal a cell phone from officers. The cell phone was subsequently searched pursuant to a federal search warrant. The seized phone had electronic communications consistent with Avalo traveling from Massachusetts to Maine to distribute both fentanyl and cocaine. The communications further identify that Avalo supplied individuals in Maine with distributable amounts of fentanyl.

8. The seized electronic communications from Avalo's phone also include

communications on or about August 19, 2021, with an individual identified as David Avalo's girlfriend. She first provided two phone numbers to Joan Avalo and noted: "just tell her you are angels brother" – based on the investigation, including electronic communications seized from Joan Avalo's phone, "Angel" was the name used when doing drug deals with individuals in Maine. On or about November 23, 2021, David Avalo's girlfriend sent Joan Avalo images of lists with names and phone numbers. She also communicated: "So the numbers that have ME is the numbers from UP TOP" – based on a review of electronic communications and other evidence, "up top" was used by the group to refer to Maine. She further communicated: "THIS IS 2different papers but some numbers might be the same."

*Joan Avalo*

9. The electronic communications from the phone seized from Joan Avalo on December 14, 2021, establish Avalo's leading role in distributing controlled substances in Maine (primarily fentanyl, but also cocaine/cocaine base) consistent with taking over his brother's drug operation. These communications begin in approximately August/September 2021 and continue through December 2021. In addition to the electronic communications, Avalo was on court-ordered GPS monitoring in Massachusetts during the period covered by the recovered electronic communications. Investigators have reviewed Avalo's GPS information and it is consistent with his traveling from Massachusetts to Maine to distribute controlled substances.

10. As noted above, on December 14, 2021, Avalo was the rear seat passenger in a vehicle stopped by BPD officers in Boston. There were two other passengers in the front seat of the vehicle. In the seat pouch directly in front of Avalo, officers found an unlocked gray "Gorilla Stash Case" which had plastic bags in it including: (1) two plastic bags of brown

powdery substance which appeared to be fentanyl and (2) three plastic bags of a substance which appeared to be cocaine base. The substances were submitted to a laboratory for testing. The brown powder tested positive for the presence of fentanyl and had a net weight of approximately 67 grams. The other substance tested positive for cocaine and had a net weight of approximately 9.5 grams. The seizures on December 14 are consistent with Avalo having access to significant amounts of fentanyl.

*Victor Pimentel*

11. The electronic communications recovered from Joan Avalo's phones confirmed that Victor Pimentel<sup>1</sup> conspired with Joan Avalo to distribute fentanyl.<sup>2</sup> Investigators identified that Avalo was in contact with a phone number associated with Pimentel. Pimentel was linked to the phone number through public records databases, the number's direct connection with a Cash App account associated with Pimentel, as well as specific communications between Avalo and Pimentel where Pimentel's name and address are referenced. Based on the electronic communications, Pimentel aided Joan Avalo in obtaining significant amounts of fentanyl and cut for preparing fentanyl in furtherance of the Maine operation. These communications include, but are not limited to:

- On September 5, 2021, Pimentel sent Avalo an electronic communication: "What you want?" Avalo responded: "40g" – consistent with 40 grams of fentanyl which is commonly sold in increments of 10 grams. Pimentel replied: "Ight 120

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<sup>1</sup> On or about January 29, 2020, Pimentel was stopped as the driver of a vehicle by Massachusetts State Police Troopers. Officers subsequently recovered a large plastic bag, with smaller bags in it, from Pimentel's person. The bags had a white and brown substance in them. The bag weighed approximately 15 grams. Pimentel admitted that the substance was cocaine and fentanyl

<sup>2</sup> Pimentel was stopped in a vehicle with Joan Avalo by Massachusetts State Police Troopers on or about June 19, 2023. Pimentel was in possession of a blue bag. Troopers were able to recover a plastic baggie from the blue bag which had blue pills in it. An initial field-test indicated the presence of oxycodone in the pills. The Troopers noted that the pills appeared to be breaking down consistent with potential pressed fentanyl pills. Pimentel was found to have over \$8,000 in U.S. currency on his person. He claimed to be unemployed but that he worked "under the table" delivering construction supplies.

cut?” – whether Avalo also wanted 120 grams of cutting agent for the 40 grams of fentanyl. Avalo responded: “Yesir that’s the right amount right?” Pimentel stated: “Yea.” Pimentel thereafter sent: “I just told him he getting it ready” – Pimentel had arranged for a source to provide the fentanyl and the cutting agent. Pimentel thereafter texted: “You remember where to go?” – this communication is consistent with this not being the first time that Pimentel had arranged a deal for Avalo from the same source. Avalo responded: “Send addy I remember the crib.” Pimentel provided a street name in Boston. Avalo replied: “Bet lmk when he’s ready” and “Where I get the cut?” Pimentel responded: “He got some for you.” Avalo replied: “Bet tell him put it separate.” The two then had communications consistent with Avalo consummating the drug transaction with the source set up by Pimentel. Pimentel thereafter texted: “You good?” Avalo replied he was.

- On September 14, 2021, Avalo sent: “You think it white cut it’ll be fire?” – Avalo was referencing fentanyl cut with a white agent. In other recovered communications, Avalo referenced distributing two types of fentanyl – white and brown. Pimentel responded: “You can try yeah” and “They might think it’s raw” – the drug customers may believe the fentanyl to be uncut. Later that day, Avalo texted that he needed “cut.” Pimentel responded: “How much?”
- On September 20, 2021, Avalo texted: “Ya ppls is on deck” – Avalo was seeking another supply from the drug source associated with Pimentel. Pimentel responded: “Yea new shit better” and “A lil more bread.” Avalo asked: “How much for 50 gs [grams]?” He also texted: “Lmk needs something ASAP.” Pimentel replied: “50 a g [gram] so 2500” – these prices are consistent with fentanyl. Avalo responded: “How many times I can hit it?” – Avalo was trying to determine how much cutting agent he could add to the fentanyl.
- On September 30, 2021, Avalo sent: “Bet check lmk 260 cut too” and “And tell him I want my jawn all hard bro no crumbs” – Avalo was seeking to be supplied with fentanyl and cutting agent. Pimentel replied: “How much” – referencing the fentanyl. Avalo responded: “Same shit 100 pack” – 100 grams of fentanyl. Pimentel replied: “And 260 of cut?” Avalo responded: “Yea.” Pimentel replied: “lght.”
- On December 5, 2021, Avalo sent Pimentel an image consistent with compressed fentanyl in large chunks and the message: “Hitting this with 10 and it’s passing onna guys” – Avalo was able to heavily cut the fentanyl due to its strength.

***Krystin Mathewson and Jacob Lyford***

12. Based on the investigation, Krystin Mathewson and Jacob Lyford worked

together to distribute fentanyl and cocaine base that was supplied to them by Avalo.

Investigators were able to identify phones used by both Mathewson and Lyford were in contact with Avalo through electronic communications. The phone number used by Mathewson to communicate with Avalo has been identified as Mathewson's phone number through subscriber information. Mathewson is repeatedly referred to as "kris" in communications with her and in communications involving Lyford. Jacob Lyford is repeatedly referred to as "Jake" in communications with Avalo. On several occasions, in electronic communications, Lyford directed Avalo to meet Lyford at locations that public records databases and law enforcement records identify as addresses associated with Lyford. Per law enforcement records, both Mathewson and Lyford have drug trafficking related associations with other targets of this investigation. I am also aware that on or about September 3, 2021, a time consistent with the communications below, Mathewson and Lyford were present together at the scene of a motor vehicle accident in Milo, Maine – a town referenced by Lyford in his electronic communications with Avalo.

13. Avalo had the following electronic communications with Mathewson and Lyford:

- On September 15, 2021, Lyford texted Avalo: "We need rock hard baseballs also" – the term "hard" is commonly used by drug dealers to reference cocaine base ("crack").
- On September 16, 2021, Lyford texted Avalo: "You around tonight?" Avalo responded: "Sorry couldn't make it something came up." Lyford replied: "When will you be back? I need like 3 or 4 of them dvds from downtown .. store" – as noted above the use of the term "down" in communications with Avalo is consistent with fentanyl.
- On September 18, 2021, Avalo texted Lyford: "Hey let kris [referring to Krystin Mathewson] know I left my buddy up that way while I'm gone so we good." Lyford responded: "Does he have hard" – cocaine base. Avalo replied: "Working on that."



- On September 20, 2021, Avalo texted Lyford: “Hey have kris call me please.”
- On September 22, 2021, Mathewson texted Avalo: “Hey you gonna be able to fix up that first set of stuff I got” and “Remember you said last time you would bring something to put in to make it better” and “You left your mix” – Mathewson was seeking to have drugs provided by Avalo “fixed” because they were not strong enough.
- On September 26, 2021, Avalo texted Mathewson: “Missing 300 kris” – consistent with her payment being short by \$300. Mathewson replied: “Yessir remember I told you I was a little short to get the whole. I can go to bank whenever you want to meet up. just couldn’t leave cuz of curfew last night.” Avalo responded: “Naw you good was just checking lmk when you almost ready again so I can grab that extra for ya.”
- On September 30, 2021, Avalo texted Lyford: “How’s everything going” – consistent with checking on whether they needed more drugs. Lyford responded: “Good how about you? Might need to see you in a couple days.”
- Similarly, on October 2, 2021, Avalo texted Lyford: “Yo when you think you guys wanna see me? So I can be ready.” Lyford responded: “Not sure.” Avalo replied: “Double check with kris and lmk.”
- On October 3, 2021, Mathewson texted Avalo: “Good morning, sorry life’s been busy and I have had to go back to my regular guy because that stuff you fixed up still isn’t good enough for my people. I lost a lot of customers due to the quality so I had to go back to my guy to get my people to come back to me. I’m more into quality than quantity. I had told you that a few times. I need good product.” Avalo responded: “So the white stuff was only bad stuff right? I tried to make it better? Every thing else was good?” and “And I just got the brown stuff back again the really good shit that’s why i been hitting you up I’ll keep you at the same price for this little inconvenience.” These communications are consistent with a dispute over the quality of Avalo’s fentanyl.
- Later on October 3, when Avalo had not received a response, he sent Lyford a text: “Hey Jake.” The two discussed meeting that day. During the discussion, Lyford texted: “Were out hunting some people down that owe us money. Well let you know when we’re about to head home.”
- On October 4, 2021, Avalo texted Lyford: “Hey tell kris I have a zip of hard lmk if she wants it I’ll swing by” – a “zip of hard” is consistent with an ounce quantity of cocaine base. Lyford responded: “Yeah we want it if its good and the price jsnright.”
- On October 14, 2021, Avalo and Lyford exchanged communications consistent with Avalo picking up money from Lyford and Mathewson.

- On October 23, 2021, Lyford texted Avalo: "... Hey did you purposely shorten that by about 14 or 15 in order to make it stronger? Its cool if you did we were just wondering because it was 86 roughly. But you always do us right so it's no worry either way." Avalo responded: "It couldn't have been probably missing a finger [10 grams] most can't be 15g short" – A "finger" is common drug jargon for 10 grams of fentanyl. Lyford responded: "One of em was 86 and the other was like 83. The two bags. O e that you fixed and the new one .. huh maybe our scales need to be calibrated. If its off a little it can become real messed up with a lot of weight" and "Y a ok now .40 becomes 4 gs if you do it 10 times." In this exchange, Lyford admitted that he and Mathewson had obtained significant amounts of fentanyl from Avalo.
- On November 2, 2021, Lyford and Avalo agreed to meet. Lyford texted: "Hey do you need the ninja? because I needed to get it out Nd get everything ready ..." – the use of a blender is consistent with mixing cut into fentanyl.
- On November 26, 2021, Lyford texted Avalo: "Just getting it moving slow going but going I need hard bro hard." Avalo replied: "It's not worth me just going for that lmk when you ready for dwn [fentanyl] too" and "You herd."

***Kayla Tasker***

14. Based on the investigation, Kayla Tasker worked with Avalo to distribute fentanyl. Investigators were able to identify that a phone used by both Tasker was in contact with Avalo through electronic communications. In several communications between Avalo and Tasker, she is identified as "Kayla." Additionally, the phone number used by "Kayla" to communicate with Avalo is associated with Kayla Tasker through public records. Similarly, in the communications with Avalo, "Kayla" provided an address for narcotics and money exchanges which is linked, through public records databases, with Kayla Tasker. Finally, in an electronic communication with Avalo on or about October 16, 2021, Tasker noted to Avalo that she was speaking to "Norman." I am aware that in or about March 2023, Tasker was arrested with her boyfriend whose first name was "Norman" in a Maine state drug investigation.

15. Avalo had the following electronic communications with Tasker:

- On September 27, 2021, Avalo texted: Tasker: “How they like the stuff” – consistent with checking on the quality of the drugs he was distributing. During this exchange, Avalo confirmed that he would be in Tasker’s area. Tasker texted: “10-450? 5?” – Tasker was asking for the price of the fentanyl that Avalo was selling. Avalo responded: “Only got full ones and grams” – a full finger of fentanyl is 10 grams. Tasker replied: “450?” – consistent with seeking 10 grams at \$450. Avalo responded” “Yea.” Tasker then provided her address for Avalo to deliver the fentanyl. The two exchanged texts consistent with Avalo providing her with 10 grams of fentanyl, including Tasker texting: “Thankyouuuuu.”
- On September 29, 2021, Avalo and Tasker discussed her progress in dealing the fentanyl to her customers. Tasker noted: “Its so different right now where no one has money lately. But like 5 months ago I went thru 2-3 that a day.”
- On October 15-17, 2021, Tasker and Avalo agreed to another delivery of 10 grams of fentanyl. On this point, on October 16, Tasker texted: “450 lol” – consistent with the prior price for 10 grams of fentanyl. On October 17, Avalo texted: “Sorry something came up yesterday definitely be around today.” The deal did not go through due to Avalo’s availability.
- On December 4, 2021, Tasker texted Avalo: “Was going to have you back but I gave my other guy 8 and he hasn’t been back. So now i gotta come up with money another way to have you by. I have no problem getting rid of it.”
- On December 6, 2021, Tasker texted Avalo: “... I got the 750 now.” She also sent him images of stacked money. The two then exchanged texts consistent with meeting and doing the deal.
- On December 8, 2021, Avalo texted: “How’s going.” Tasker responded: “[G]oing good. Some days little faster than others. But so far everyone said stronger.” Avalo replied: “They loved it right?” Tasker responded: “Yes definitely. Some days are slow. Some days are fast. I really can’t place why. Other than what people have for money I guess. Idk its weird. Everyone that’s taken it has liked it this far. Said it better than other that’s been around.” Avalo replied: “Ok sounds good just keep me posted.” Tasker responded: “I’ll let you know tomorrow how I’m doing too. Snowing pretty good here right now. I’m glad you left it because even if it takes a few days better than asking you every day or every other day to come lol.”
- On December 10, 2021, Tasker texted: “Still planning on tomorrow night. If anything changes ill let you know. Been super slow. Im not use to this slow..lol 3 of my good people had left because I was empty for 4 days..i gained back 1 of them. But it definitely made a difference. Usually move 3 times this in this time. Lol but im getting there. Super sorry. Im good for the money. Just sometimes is faster sometimes is slower.”

- On December 12, 2021, Tasker texted: “Yes were all set. Bring more lol” and “Ill get rid of more this week because people have money again. That was literally the slowest its ever been for me.” She also texted: “It’s usually at least double what I did this week. Especially where people are coming back again. It’ll pick up.” The two then exchanged texts consistent with Avalo delivering Tasker fentanyl that day.

*Amanda Lapointe*

16. Based on the investigation, Amanda Lapointe was supplied with distributable amounts of fentanyl that she was thereafter selling to her drug customers. Investigators were able to identify a phone used by Lapointe was in contact with Avalo through electronic communications. In several electronic communications between Avalo and Lapointe, she is identified as “Amanda.” The address where Lapointe directed Avalo to meet her to facilitate their drug trafficking is a residential address associated with Lapointe through public records databases. Additionally, law enforcement records associate Lapointe with other targets of this investigation, including an individual who was involved in Lapointe’s communications with Avalo.

17. Avalo had the following electronic communications with Lapointe and an associate of Lapointe:

- On September 23, 2021, Avalo texted: “Amanda it’s angel” – as discussed above, “Angel” was the name used by David Avalo in Maine.
- On September 24, 2021, Lapointe texted: “Hey Angel do you think that we can meet up here again tonight.” Avalo responded: “Hey what did you need hun.” Lapointe replied: “The same bet a hole one” – this statement is consistent with her requesting a “whole” finger of fentanyl – 10 grams. Avalo responded: “Ok.” Lapointe provided her address to Avalo “again” and also provided a description of the trailer where they were meeting. Lapointe again confirmed: “The hole finger of the same stuff plz.” Subsequent texts confirm the delivery of 10 grams of fentanyl.
- The two exchanged texts consistent with Avalo making another delivery on September 29, 2021 – which would be consistent with another 10 grams of fentanyl.

- On September 30, 2021, Lapointe texted: “Hey does it could you do 400 today” - \$400 for 10 grams of fentanyl. Avalo responded: “I could do 800 if you grab 2” - \$800 for 20 grams of fentanyl. Lapointe agreed to do the deal. The two then agreed to a delivery of 20 grams of fentanyl on October 1, 2021.
- On October 1, 2021, the two exchanged texts consistent with Avalo delivering the 20 grams of fentanyl that day. Avalo also texted: “You have a blender” – a blender can be used to mix cut with fentanyl. Lapointe responded that she had a hand blender.
- Lapointe also used a phone that she identified as her boyfriend’s phone in a text. On October 3, 2021, Lapointe sent a text: “Hey angle it’s amanda” and asked to meet with Avalo. Avalo responded: “Yea you needed 1 or 2” referring to 10 or 20 grams of fentanyl. Lapointe replied: “1 please.” The two then exchanged texts establishing that the delivery took place.
- Lapointe and her boyfriend also used a third phone to communicate with Avalo. On December 11, 2021, Avalo texted: “... I need that 2k [\$2000] to reup I can’t wait any longer I’ll be there tomorrow I got you just wait till tomorrow trust me” – this is consistent with Lapointe having a \$2000 outstanding debt for fentanyl fronted to her by Avalo and he agreed to provide more fentanyl based on the payment of the \$2000.

*Michael St. Pierre*

18. Investigators have identified Michael St. Pierre as another of the individuals who conspired with Joan Avalo to distribute controlled substances in Maine. Investigators identified that St. Pierre was working with Avalo through numerous communications where St. Pierre is referred to as “Mike.” The subscriber information of the phone number used by St Pierre to communicate with Avalo, and the address where Avalo is directed to meet to consummate drug transactions, are both directly associated with Michael St Pierre through public records databases.

19. Investigators have recovered the following electronic communications between a phone associated with St. Pierre and Joan Avalo:

- On September 10, 2021, St. Pierre communicated: “Let me see where I’m at & I ll get back with you. I’d can take a few of them at the mbers we talked about right now.if

that helps you.” He also communicated: “Let my guys see how it goes if good I’d do at least 10 later 2nite. Lmk.” Avalo agreed to meet and asked for an address. St. Pierre responded: “24 ghost Rd. Springfield me., 04487” – this address is directly associated with Michael St. Pierre.

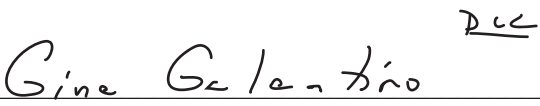
- On September 11, 2021, Avalo sent: “Ok did you want 2 or 3?” St. Pierre responded: “2 anyways.” The two then agreed to meet.
- On September 16, 2021, Avalo sent: “How did they like that new stuff let me know ASAP!” and “Just checking see how was the new down I have you yesterday lmk” – Avalo was checking the quality of the “down” – fentanyl – which he had provided to St. Pierre the previous day.
- On September 18, 2021, the two agreed to meet. Avalo asked: “ok you got rid of all 3 already” – based on the communications, this is a reference to 3 “fingers” of fentanyl which is 30 grams. St. Pierre responded: “No but should by tonight.” Avalo asked: “What you got 1 left?” St. Pierre responded: “Not that much” and “Got ur \$\$ I borrowed .. u got more come see me now.” The two then shared updates of Avalo’s driving to meet him.
- On September 20, 2021, Avalo sent: “Got some new stuff I want you to try ASAP lmk when you home.” The two discussed meeting. Avalo sent: “... [Y]ou got some cash for me ? It’s cool if you don’t have it all just yet I’ll come” – this statement is consistent with Avalo fronting fentanyl to St. Pierre who would then have to pay for the drugs after they were sold. St. Pierre responded: “Oh yeah of course I do.” Avalo replied: “New shit fire A1” and “Bet have it all I’ll leave you some new stuff fire.”
- On September 22, 2021, Avalo sent: “Was gonna ask if you had a blender need to use it ASAP” – based on my training and experience blenders are used in the preparation of drugs for distribution as they are used to mix cut into the drugs.
- On September 24, 2021, Avalo sent: “2300” and “How we looking” – this is consistent with Avalo seeking \$2,300 for fronted fentanyl. The two then had multiple communications about Avalo getting his money. On September 29, 2021, St. Pierre texted: I’m home now but not much\$\$ yet waiting for my boy” and “Got some.”
- On October 4, 2021, Avalo communicated that he was on his way to Maine. St. Pierre responded: “Ok bud. Any hard ?” – “hard” is common drug slang for cocaine base (“crack”). Avalo replied: “Yea I can get it but you just gotta buy it I can’t front the hard.” The other communications that day are consistent with the two meeting.
- On October 6, 2021, Avalo sent: “How’s going bud” – seeking an update on the fronted drugs. He did not receive a reply that day. On October 7, 2021, Avalo sent: “Was going to give you 5 free ones after you done don’t f\*\*k it up.” St. Pierre

subsequently replied: “No we r all good. Only been a CPL days.” Avalo stated: “I know I’m just checking in on ya that’s all.”


- On October 21, 2021, Avalo sent: “Do you have 3k now” - \$3,000 for fronted fentanyl.
- On November 1, 2021, St. Pierre sent: “I got some [money] for you. Could use some more work if u have some.” Avalo responded: “Yea just grab the most you can right now I’ll be around tomorrow I got you.”

**CONCLUSION**

20. Given the above facts, there is probable cause to believe that David Avalo, Joan Avalo-Quezada, Victor Pimentel, Krystin Mathewson, Jacob Lyford, Kayla Tasker, Amanda Lapointe and Michael St. Pierre conspired to distribute and to possess with intent to distribute controlled substances in violation of Title 21, United States Code, Section 846.

  
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Gina M. Galantino  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn to before me telephonically in accordance with the requirements of Federal Rule of Criminal Procedure 4.1 on February 13, 2024.



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HON. DONALD L. CABELL  
CHIEF UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MASSACHUSETTS

