

AFFIDAVIT

I, Jason Abramoski, being duly sworn, do hereby state as follows:

1. I am a trooper with the Massachusetts State Police (MSP). I became a trooper with MSP in October 2011. Currently, I am assigned to the Massachusetts State Police Division of Homeland Security and Preparedness – Commonwealth Interstate Narcotics Enforcement Reduction Team (“C.I.N.R.E.T”), where my duties are to investigate narcotics distribution cases. I previously worked as a homicide and narcotics investigator for the MSP unit assigned to the Plymouth County District Attorney's Office.

2. In addition to my work as a Trooper with MSP, I am a Task Force Officer (TFO) with the Department of Homeland Security, Homeland Security Investigations (HSI). I am currently assigned to the Organized Crime Drug Enforcement Task Force, New England Strike Force, a multi-agency task force whose mission is to identify, investigate, disrupt, and dismantle large-scale, violent drug trafficking organizations operating in the District of Massachusetts and elsewhere. I am the co-case agent on an investigation by HSI, the Drug Enforcement Administration (DEA), MSP, and the Brockton Police Department into several interrelated drug trafficking cells operating in eastern Massachusetts.

3. I submit this affidavit in support of an application for a criminal complaint charging that from at least on or about September 2018 to the present, Jose PEREZ FELIX, a/k/a “Eugenio Piedraita-Rivera,” a/k/a “Roberto Patricio Ramirez,” a/k/a “Grande,” (hereinafter, “PEREZ FELIX”), Yonatan LARA (hereinafter, “LARA”), Edward CHAPMAN (hereinafter, “CHAPMAN”), and Anthony TSINA (hereinafter, “TSINA”) (collectively, “the Targets”), conspired to distribute and to possess with intent to distribute heroin, fentanyl, cocaine, and oxycodone, in violation of Title 21, United States Code,

Section 846. This affidavit does not set forth every fact developed during the course of this investigation but rather sets forth only those facts necessary to establish probable cause that the Targets committed the enumerated offense.

BACKGROUND

4. This investigation initially targeted the drug trafficking activities of a violent Brockton drug trafficker named Djuna Goncalves. Utilizing controlled purchases of narcotics, physical surveillance, surveillance from stationary pole cameras, analysis of telephone records, search warrants for locations, search warrants to track cellular telephones, and a Title III wiretap, agents determined that Djuna, two of his brothers, and several co-conspirators were distributing fentanyl, heroin, cocaine, crack cocaine, and marijuana in southeastern Massachusetts. Interceptions from Djuna's cellular telephone showed that Djuna regularly distributed narcotics from his home at 12 Addison Avenue in Brockton.¹

5. Agents intercepted Djuna speaking to one of his suppliers, whom he called "Grande," and agents observed meetings between Djuna and "Grande" in Boston where Djuna ordered and "Grande" supplied Djuna with cocaine and heroin / fentanyl. Agents eventually identified "Grande" as PEREZ FELIX and obtained authorization to intercept three of his cellular telephones. In addition, based on the investigation, including surveillance observations and intercepted calls, agents determined that PEREZ FELIX lives at 26 Walton Street, Dorchester, Massachusetts, which is a two and a half story multi-family residence.

¹ On October 21, 2018, Djuna survived an assassination attempt at 12 Addison Avenue after an as-yet unidentified assailant fired several shots into Djuna's basement apartment. During a search of Djuna's home, agents seized fentanyl, cocaine, crack cocaine, marijuana, and several firearms, including an AK-47-style assault rifle. Agents subsequently arrested ten people, including Djuna, and charged them with drug trafficking and firearm-related offenses. See United States v. Djuna Goncalves et al., Cr. No. 18-10468-NMG. Several of the charged defendants have either pleaded guilty or advised the Court of their intention to plead guilty.

The interceptions revealed that PEREZ FELIX distributed significant quantities of heroin, fentanyl, and cocaine in the greater Boston area. Agents also identified other significant members of PEREZ FELIX's drug cell, including LARA. PEREZ FELIX and LARA used a 2008 black Subaru Outback, registered to LARA, to distribute narcotics. Agents saw PEREZ FELIX and LARA take "meaningless" rides in the Subaru – essentially driving the car around the block or a short distance as a means of shielding their transactions from law enforcement – and saw both men use the Subaru to distribute narcotics to street-level dealers and users. Agents intercepted PEREZ FELIX and LARA discussing the acquisition and distribution of oxycodone pills. Over the course of the investigation, agents seized oxycodone pills from LARA after two street-level sales.

6. Agents also identified CHAPMAN and TSINA as significant drug traffickers supplied by PEREZ FELIX. CHAPMAN has been convicted of drug trafficking offenses on five prior occasions,² and was intercepted on numerous calls with PEREZ FELIX discussing drug transactions. Agents also intercepted telephone calls between PEREZ FELIX and TSINA, and ultimately seized over 50 grams of heroin from TSINA after they watched PEREZ FELIX supply him with it. And interceptions from PEREZ FELIX's phone led

² In 2004, CHAPMAN was convicted in Berkshire Superior Court of possession with intent to distribute cocaine, second offense, and possession with intent to distribute cocaine within 1,000 feet of a school, and sentenced to seven and a half to eight years in prison. In 1997, CHAPMAN was convicted in Berkshire Superior Court of two separate possession with intent to distribute cocaine in a school zone cases and was sentenced to five and a half to six years in prison. In 1993, CHAPMAN was convicted in Berkshire Superior Court of distribution of cocaine and was sentenced to two years in prison, one year to serve, balance suspended for two years.

agents to Luis Alfredo Baez and other members of a separate Boston-based drug cell that on occasion supplied PEREZ FELIX's group.³

PROBABLE CAUSE

7. PEREZ FELIX Supplied Djuna. During September 2018, agents intercepted Djuna speaking to a Boston-area drug dealer that Djuna referred to "Grande," eventually identified as PEREZ FELIX. On September 18, 2018, PEREZ FELIX agreed to meet Djuna and supply him with a quantity of "brown," which I believe to be heroin or a fentanyl/heroin mixture, and "China," which I believe to be fentanyl (the call made clear that the heroin was for Djuna and the fentanyl was for his brother Cody). Djuna also asked PEREZ FELIX if he had any "perico," or cocaine, for sale. PEREZ FELIX told Djuna that his source of supply for cocaine quoted him a price of "one ounce for \$1,500." PEREZ FELIX told Djuna this was "too much" and PEREZ FELIX told Djuna he planned to leave for New York to be re-supplied after their meeting and could get him a better price after he returned.

8. After these calls, agents followed Djuna and Jermaine Gonsalves as they drove Gonsalves's rental car from 12 Addison Avenue to Boston to meet PEREZ FELIX. Agents watched the brief meeting between PEREZ FELIX, a second as-yet unidentified individual,

³ Baez and his partner, Luis Mejia Guerrero, distributed large quantities of narcotics to PEREZ FELIX and others from a stash house located on Mt. Ida Road in Dorchester. On May 13, 2019, agents intercepted Baez ordering cocaine from Cesar Rodriguez-Sanquentin, a distributor for a Lawrence-Methuen based drug trafficking organization. Agents seized one kilogram of cocaine from Rodriguez-Sanquentin as he was on his way to meet Baez at the stash house. Agents seized \$50,000 in cash, additional bags of cocaine, packaging materials, and a digital scale. Baez, Guerrero, and Rodriguez-Sanquentin were recently charged by complaint, see United States v. Baez et al., No. 19-MJ-2209-MBB, and ordered detained pending trial. In the near future, the government anticipates seeking a superseding indictment to add PEREZ FELIX, LARA, CHAPMAN, TSINA, Baez, Guerrero, and Rodriguez-Sanquentin to the existing Goncalves indictment.

Djuna, and Gonsalves near a Spanish restaurant on Harvard Street in Boston. After the brief meeting, Djuna and Gonsalves returned to Gonsalves's rental car each carrying a plastic bag, which I believe contained the previously-ordered heroin and fentanyl. Djuna and Gonsalves dropped PEREZ FELIX off near his home at 26 Walton Street in Dorchester. PEREZ FELIX entered his home carrying a white plastic bag, which I believe contained U.S. currency, left a few minutes later, and – still holding the plastic bag – eventually got into the passenger seat of a Honda CRV. Agents followed the Honda to Route 95 south as it headed toward New York. Later that evening, using a stationary pole camera, agents watched Djuna and Gonsalves return to 12 Addison Avenue. Djuna got out of Gonsalves's rental car carrying a white plastic bag and walked into his residence.

9. Approximately one week later, on September 26, 2018, PEREZ FELIX produced a Dominican identification card bearing his photograph in the name of Roberto Patricio Ramirez during a traffic stop. The card listed his height as 6 feet 5 inches tall and his weight at 260 pounds. Through reviewing a series of court and immigration records and photographs, agents determined that “Grande” was PEREZ FELIX. Further investigation of PEREZ FELIX revealed that he had been previously convicted of narcotics offense under a different alias. In 2007 and 2008, under the alias “Eugenio Piedraita-Rivera,” PEREZ FELIX was convicted of two counts of possession with intent to distribute heroin and was sentenced to a total of eight years in prison. After his conviction, he was interviewed by HSI agents. During the interview, PEREZ FELIX claimed to be a U.S. citizen and produced a Puerto Rican birth certificate in the name of Piedraita-Rivera and a photocopy of an identification card from Puerto Rico. Agents ran his fingerprints through an immigration database and determined that his prints matched those of a Jose PEREZ FELIX, who had

been encountered in 2000 in Puerto Rico attempting to board a flight to the United States on an altered Dominican passport (immigration officials blocked his entry to the U.S. and returned him to the Dominican Republic). When confronted with the results of the fingerprint search, PEREZ FELIX admitted his true name and acknowledged that he was a citizen of the Dominican Republic. At the conclusion of his prison sentence, PEREZ FELIX was deported to the Dominican Republic.

10. LARA and PEREZ FELIX. Agents identified LARA as a lieutenant in PEREZ FELIX's drug cell. On numerous occasions, agents observed PEREZ FELIX and LARA operating or traveling in LARA's 2008 black Subaru Outback. Agents frequently saw PEREZ FELIX and LARA take "meaningless" rides in the Subaru – essentially driving the car around the block or a short distance as a means of shielding their transactions from law enforcement – and saw both men use the Subaru to distribute narcotics to street-level dealers and users.

11. For instance, on October 29, 2018, agents observed PEREZ FELIX walk out of 26 Walton Street and walk over to Grace Street, where the black Subaru Outback was parked, but the engine was running. Agents watched as the Subaru traveled from Washington Street to Columbia Road to Supple Road, then back onto Washington Street, before returning to Walton Street. Agents then observed PEREZ FELIX get out of the Subaru, and saw LARA get out of the front passenger seat and sit in the Subaru's driver's seat, then drive away. The Subaru traveled down Walton Street towards Washington Street. Based on my training and experience, I believe that this "meaningless ride" allowed PEREZ FELIX to provide narcotics to LARA in the relative privacy of the black Subaru, in an attempt to avoid law enforcement detection.

12. Agents then watched LARA as he drove the Subaru to 20 Parmenter Street in Boston. An agent passed by LARA as he was parked on the side of the road in the black Subaru and observed LARA pulling a plastic bag into a knot with his mouth. At that time, two additional agents pulled up next to the Subaru and observed LARA throw a piece of the clear plastic bag out of the driver's side window of the black Subaru. Agents watched a suspected drug buyer turn from Hanover Street onto Parmenter Street while on the telephone. Agents observed LARA to be on the telephone at the same time and saw LARA make eye contact with the drug buyer. Both LARA and the drug buyer nodded and hung up the telephones. The drug buyer walked into 20 Parmenter Street. Five seconds later, LARA got out of the Subaru (though he left the car running) and entered to 20 Parmenter Street. Ten seconds later, LARA walked out of 20 Parmenter Street, got back into the Subaru, and drove off.

13. Agents stopped the drug buyer and recovered a knotted clear plastic bag with residue of a powdery substance from his right coat pocket. Agents also recovered the piece of the torn corner bag from the street in front of 20 Parmenter Street. The buyer did not have any identification on him but provided agents with a parking ticket for his car that listed his home address as an apartment at 20 Parmenter Street. Agents noted that they had observed the buyer's car on Walton Street on October 24, 2018 and observed the occupant of the car enter and quickly exit PEREZ FELIX's home. While the drug buyer denied purchasing narcotics, I believe, based on my training and experience, my work on this investigation, and the recovery of the bag with residue, that PEREZ FELIX provided LARA with heroin, LARA sold the heroin to the buyer, and the buyer ingested the heroin shortly before agents stopped

him. The knotted clear plastic bag with residue and the piece of the torn corner bag were sent to the DEA Northeast Laboratory for testing, and the analysis remains pending.

14. Agents intercepted PEREZ FELIX and LARA engaged in coded discussions about acquiring and distributing heroin. For instance, on April 4, 2019, LARA asked PEREZ FELIX, “What’s better the old or new?” and PEREZ FELIX replied, “that depends . . . depends on what it is.” I believe based on my training and experience and my work on this investigation that PEREZ FELIX and LARA were discussing different types of heroin that PEREZ FELIX had available to sell. Later that day, agents intercepted calls where PEREZ FELIX discussed driving to New York with LARA to be re-supplied with narcotics. LARA informed PEREZ FELIX that he wanted to take a bus and that he would not travel in a vehicle that was “loaded.”

15. Agents also intercepted calls where PEREZ FELIX and LARA discussed distributing oxycodone. For instance, on March 19, 2019, agents intercepted a call between PEREZ FELIX and LARA on PEREZ FELIX’s phone. LARA asked PEREZ FELIX what he needed and PEREZ FELIX responded “I need the pill,” or oxycodone. LARA said he would meet him in about an hour. Later that night, PEREZ FELIX called LARA and complained that LARA said he would call within an hour and that it had already been an hour. PEREZ FELIX responded that he was “about to get to Walton.” Following that call, through physical surveillance GPS data on the Subaru, agents observed LARA meet with PEREZ FELIX outside of 26 Walton Street. The next day, on March 20, 2019, agents intercepted a call between PEREZ FELIX and LARA. During the call, PEREZ FELIX asked

LARA where the pills were as he has been “looking for them” and could not find them. LARA responded that he saw them “in the front,” on the floor.⁴

16. PEREZ FELIX and CHAPMAN. CHAPMAN is a significant Pittsfield-area narcotics trafficker who has been convicted of drug trafficking offenses on five prior occasions. While many of the telephone calls intercepted over PEREZ FELIX’s cellular telephones were in Spanish, the calls between PEREZ FELIX and CHAPMAN were in English. On several occasions, agents intercepted CHAPMAN ordering “brown,” or a heroin / fentanyl mixture, and “white,” or cocaine, from PEREZ FELIX. CHAPMAN even ordered heroin from PEREZ FELIX while taking his children trick-or-treating on Halloween. Agents also observed several meetings where CHAPMAN traveled from western Massachusetts to Boston to pick up narcotics from PEREZ FELIX.

17. For instance, on March 15 and 16, 2019, agents intercepted multiple calls between PEREZ FELIX and CHAPMAN over PEREZ FELIX’s phone. During these calls, PEREZ FELIX and CHAPMAN discussed meeting for a narcotics transaction. CHAPMAN asked PEREZ FELIX if he could “get the white” and told PEREZ FELIX that another source of supply will give him a better price for the narcotics. PEREZ FELIX told CHAPMAN that he could not do that price and CHAPMAN replied that he was “still gonna buy some from you.” The next day, on March 16, 2019, CHAPMAN told PEREZ FELIX he wanted “30 of

⁴ On November 13, 2018, Boston Police officers observed LARA sell to two different drug buyers near Supple Road in Roxbury. When officers arrested LARA, they seized a sandwich bag containing 16 plastic bags, each of which contained numerous oxycodone pills (76 pills in all), along with eight plastic bags of cocaine. All told, officers seized \$3,571 in cash and two cellular telephones from LARA. Officers compared the oxycodone pills recovered from both buyers and the pills seized from LARA and concluded that all of the pills appeared to be consistent in size, shape, and markings. Agents confirmed that one of the phones seized from LARA was a phone that had been in contact with PEREZ FELIX.

the brown” and he asked about the “white.” PEREZ FELIX advised CHAPMAN that he was not able to obtain the “white.” CHAPMAN became upset and told PEREZ FELIX that he would lose a lot of money.

18. Using physical surveillance and a court-authorized GPS tracker on the Subaru, agents tracked PEREZ FELIX as he went from 26 Walton Street to the intersection of Norton and Bowdoin Streets in Dorchester. Agents intercepted calls between CHAPMAN and PEREZ FELIX, during which CHAPMAN advised PEREZ FELIX he was on his way to meet him. Agents saw CHAPMAN’s vehicle parked on Norton and Bowdoin Street and observed both men meeting inside the El Pollo restaurant at 225 Bowdoin Street. A short time later, agents observed CHAPMAN leave the restaurant and drive away. Based on my training and experience and my work on this investigation, I believe that PEREZ FELIX met CHAPMAN at the restaurant and sold him heroin (“the brown”).

19. On March 23, 2019, agents intercepted a call on PEREZ FELIX’s telephone between PEREZ FELIX and CHAPMAN, during which CHAPMAN asked PEREZ FELIX if he had some “white” and PEREZ FELIX responded, “okay, let me pick up from somebody.” CHAPMAN further stated, “let me know if you can get it because I need it, all right?” and he also asked what the price was going to be. PEREZ FELIX told CHAPMAN he would call someone and get back to him. Later that day, PEREZ FELIX called CHAPMAN and told him the price for “white” would be “thirteen,” then he stated it would be “fourteen.” CHAPMAN asked if he could get it for “12 or 12.5,” because that is what he gets from his “other partner,” but he stated that he wanted to get it through PEREZ FELIX. PEREZ FELIX responded that he would “check with the other guy.”

20. Thereafter, agents intercepted a call where PEREZ FELIX’s told an

unidentified source of supply that the “guy” wants to pay “twelve or twelve and a half.” A short time later, surveillance observed a brown 2009 Toyota Camry arrive at PEREZ FELIX’s residence at 26 Walton Street. A passenger got out of the Camry, retrieved a bag from the trunk, went into 26 Walton Street for a short period of time, got back into the Camry, and drove off. Based on the investigation, I believe that CHAPMAN is the “guy” that PEREZ FELIX referred to during this conversation.

21. On March 24, 2019, agents intercepted a number of calls between PEREZ FELIX and CHAPMAN setting up a narcotics transaction. The calls included this passage:

PEREZ FELIX: How much for an ounce?

CHAPMAN: What?

PEREZ FELIX: How much for an ounce?

CHAPMAN: Well, I'm right here on Walton street remember where we used to meet at? How about the restaurant over on eater [sic] right on the corner from you house.

PEREZ FELIX: Huh

CHAPMAN: Hum, the thing is [U/I] I was trying to get the white, because I need the white right now, I gotta pay my guys, they works for that and still need the brown at last, but I need the white, remember that I told you the last time...

PEREZ FELIX: Okay

CHAPMAN: But the brown...

PEREZ FELIX: Okay

CHAPMAN: Huh

PEREZ FELIX: Okay, see you and come by

CHAPMAN: [U/I]

PEREZ FELIX: Let me go to somebody for the white

CHAPMAN: Alright right now the brown, I might be get some brown, but I didn't bring all the money for brown, you know . . . at least. If you want I can give 30 and I'll take on Monday from someone down there, it's up to you and definitely - definitely the white, I'll see all my workers on that . . . when I go home . . . Monday go to the bank, get the money and send it to you.

PEREZ FELIX: Okay. What do you need - white or brown?

CHAPMAN: At least the white now, but that I said if you wanna do some brown for me and you will see the money on Tuesday I mean on Monday by Western Union, I can do that too [unintelligible]

PEREZ FELIX: No, no

CHAPMAN: All right I need some white, I told you last night I need white that's why I came out there

PEREZ FELIX: Huh

CHAPMAN: I need the white I – I'll pay all my guys for the white

PEREZ FELIX: Hum, let . . . let me, I got it. Okay

CHAPMAN: Okay, alright bye

22. Surveillance observed PEREZ FELIX go inside the building located at 26 Walton Street and then leave the building and drive to the area of Bowdoin Street and Norton Street. Agents observed PEREZ FELIX again go into the El Pollo restaurant. At that time, agents intercepted a call where PEREZ FELIX told CHAPMAN that he was at the restaurant. Agents then saw CHAPMAN enter the restaurant with a woman identified as his girlfriend, and approximately fifteen minutes later, agents observed CHAPMAN, the woman, and PEREZ FELIX leave the restaurant get into CHAPMAN's vehicle and drive away. Surveillance ended at that time. A few days later, on March 27, 2019, CHAPMAN

complained to PEREZ FELIX about the quality of his drugs: “all my people are complaining. They said they don’t feel it, it’s fucking garbage. It’s weak, it’s a fucking waste for me!”

23. Based on my training and experience and my work on this investigation, I believe CHAPMAN’s “complaints” about the quality of PEREZ FELIX’s drugs were, in essence, attempts by CHAPMAN to get PEREZ FELIX to lower his price. After completing, and complaining about, the March 24, 2019 narcotics deal, CHAPMAN called PEREZ FELIX on March 29, 2018 and again ordered cocaine and heroin from him. In particular, CHAPMAN complained to PEREZ FELIX, “the brown is getting weak. My people said it’s not as good as the other one. It’s okay but it’s not like the first one that you gave me,” and PEREZ FELIX replied, “I give you a new one, so you can . . .,” and CHAPMAN interrupted, “all right, all right.” The two men agreed to meet the next day.

24. On March 30, 2019, PEREZ FELIX and CHAPMAN spoke and confirmed that they would meet later that afternoon. At around 5:54 p.m., agents observed a car used by CHAPMAN circling the area of the El Pollo restaurant. At approximately 6:44 p.m., agents used the pole camera to watch a 1997 green Honda Civic arrive at 26 Walton Street. The driver of the Honda got out of the car and walked into 26 Walton Street carrying a plastic bag. One minute later, the driver walked out of 26 Walton Street and drove off. At 6:54 p.m., agents observed PEREZ FELIX walk out of 26 Walton Street and drive off in the Subaru registered to LARA. Using data from the Subaru’s GPS device, agents knew that PEREZ FELIX traveled to the El Pollo restaurant. At 7:06 p.m., agents observed PEREZ FELIX approach CHAPMAN’s car and sit down in the back passenger seat. At 7:07 p.m., agents observed CHAPMAN drive off with PEREZ FELIX still in the car and drive to Washington Street, near 26 Walton Street. At 7:22 p.m., CHAPMAN’s car left the area. At 7:23 p.m.,

precise location information from PEREZ FELIX's cellular telephone placed him in the vicinity of Walton Street. Based on the investigation, and my training and experience, I believe that a source of supply arrived in the Honda on Walton Street and delivered cocaine or heroin or both to PEREZ FELIX. PEREZ FELIX delivered the narcotics to CHAPMAN at the El Pollo restaurant, and CHAPMAN drove PEREZ FELIX back to Walton Street.

25. PEREZ FELIX and TSINA. During this investigation, agents intercepted several calls where TSINA ordered narcotics from PEREZ FELIX. For instance, on April 9, 2019, agents intercepted a call between PEREZ FELIX and TSINA over PEREZ FELIX's phone. During the call, TSINA told PEREZ FELIX that he had been trying to get in touch with him and needed to see him. PEREZ FELIX told TSINA he would meet him on Bowdoin Street in Dorchester. Agents had previously surveilled suspected drug deliveries from PEREZ FELIX to TSINA at this location. Using physical surveillance and data from a court-authorized GPS device, agents observed PEREZ FELIX drive the Subaru to the vicinity of Bowdoin Street. Agents observed TSINA parked on Bowdoin in a white Nissan Rogue. Agents watched as PEREZ FELIX went to the passenger side window of TSINA's Nissan Rogue. PEREZ FELIX reached across TSINA's mother, seated in the front passenger seat, and had a quick exchange with TSINA in the driver's seat. PEREZ FELIX then walked back in the direction of his car and TSINA and his mother drove off.

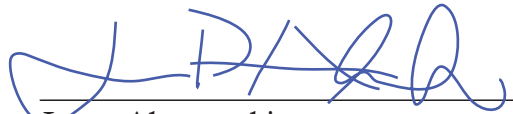
26. Agents maintained surveillance on TSINA's Nissan. After TSINA had traveled away from Bowdoin Street, agents requested that a marked Massachusetts State Police trooper conduct a motor vehicle stop of TSINA. At approximately 2:15 p.m., Trooper Peter Towle observed TSINA twice change lanes without signaling. Trooper Towle activated his cruiser lights and pulled TSINA over on Freeport Street by Mill Street in Boston. Trooper

Towle observed TSINA lean toward his left side as if trying to retrieve or hide an item and TSINA's mother turned her body towards Trooper Towle and then quickly faced forward. Trooper Towle noted that TSINA appeared extremely nervous and was breathing heavily. TSINA told Trooper Towle he was in Boston to get toys for his son's birthday, although there were no shopping bags or boxes evident in the vehicle. Trooper Towle directed TSINA to get out of the driver's seat. During a pat-frisk, Trooper Towle felt a soft "squishy" object that felt like a plastic bag on TSINA's left pants leg. The bag contained a tan powdery substance that appeared to be heroin and/or fentanyl. TSINA was arrested and transported to the State Police barracks in South Boston. The bag and its contents weighed approximately 62 grams. A field test of the contents was positive for the presence of heroin. The substance was sent to the DEA Northeast Laboratory for testing, and the analysis remains pending. Agents also seized four cellular telephones from TSINA, including one that was in contact with PEREZ FELIX.

CONCLUSION

For the foregoing reasons, I respectfully request that the Court issue the accompanying criminal complaint charging PEREZ FELIX, LARA, CHAPMAN, and TSINA with conspiracy to distribute and to possess with intent to distribute heroin, fentanyl, cocaine, and oxycodone, in violation of Title 21, United States Code, Section 846.

Signed under the pains and penalties of perjury this 29th day of May, 2019.



Jason Abramowski
Task Force Officer
Homeland Security Investigations

Sworn to and subscribed before me this 29th day of May 2019.



The Honorable Donald L. Cabell
United States Magistrate Judge

