

# UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA )

v. )

ISREAL LANDA-LEON, A/K/A ISREAL LEON )  
AND A/K/A ISREAL LANDA, )

Case No. 13-MJ-716 (JSM)

## CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about October 30, 2013, in Hennepin County, in the State and District of Minnesota, defendant

did knowingly and intentionally possess with intent to distribute more than 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

I further state that I am a Task Force Officer with the United States Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:  Yes  No

*Paul A. Ford*

Complainant's signature

Paul A. Ford, DEA Task Force Officer

Sworn to before me and signed in my presence.

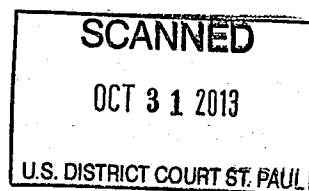
Date: 10/31/13

City and state: St. Paul, MN

*Janie S. Mayeron*

Judge's signature

Janie S. Mayeron, United States Magistrate Judge  
Printed name and title



STATE OF MINNESOTA )  
  ss. )  
COUNTY OF RAMSEY    )

AFIDAVIT OF PAUL FORD  
IN SUPPORT OF CRIMINAL  
COMPLAINT

13-MJ-716 (JSM)

Paul A. Ford, being duly sworn, deposes and states as follows:

1. Your Affiant, Task Force Officer (“TFO”) Paul A. Ford, is a Sergeant with the Saint Paul Police Department, Saint Paul, Minnesota, where I have been employed since 1998. Prior to my employment with the Saint Paul Police Department, I was employed as a police officer by the Mankato Department of Public Safety, beginning in 1996. I have been a Sergeant/Investigator since 2006. In that capacity, I have participated in numerous investigations, as case agent and supervisor, related to the distribution of controlled substances, including the use of undercover operations, informants, surveillance, pen registers, and TIII wire intercepts. In October 2011, I was assigned to the Drug Enforcement Administration (“DEA”) in Minneapolis, Minnesota, as a Task Force Officer. In that capacity, I have worked as a case agent and participated in many other investigations that related to the importation and distribution of controlled substances throughout the United States, conducted undercover operations using confidential sources and undercover law enforcement officers, debriefed witnesses and confidential sources, written applications for pen registers and TIII wire intercepts, and utilized phone toll analysis to advance investigations. In November 2011, I was deputized as a DEA Task Force Officer pursuant to the authority granted to the Attorney

General by Public Law 99-570, Section 1869, and delegated to the Administrator of the DEA, pursuant to Title 28, Code of Federal Regulations, subpart R, Section 0.100 *et seq.*

2. This Affidavit is submitted in support of a Complaint against ISREAL LANDA-LEON, charging him with possession with the intent to distribute crystal methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

3. The facts and information contained in this affidavit are based upon my own investigation and observations and those of other agents and law enforcement officers involved in the investigation. All observations referenced below that were not made by me were related to me by the persons who made such observations. This affidavit contains information necessary to support probable cause for the attached Application. It is not intended to include each and every fact and matter observed by me or known to the Government.

4. Your Affiant and members of DEA are currently investigating ISREAL LANDA-LEON and other persons known and unknown who are part of or are associated with a Drug Trafficking Organization (DTO) that is distributing methamphetamine and cocaine in Minnesota and elsewhere.

5. As part of the investigation, the Drug Enforcement Administration Task Force (DEA) has worked with Confidential Sources of Information who have provided information concerning drug trafficking by LANDA-LEON and others. Under the direction and control of Task Force Officers, one of those Confidential Sources, referred to herein as CS-2, arranged to purchase one pound of crystal methamphetamine from

LANDA-LEON on October 30, 2013. CS-2 and LANDA-LEON had communicated on several previous occasions regarding the possibility of CS-2 purchasing a large quantity of narcotics from LANDA-LEON. On Friday, October 25, CS-2 and LANDA-LEON had a specific conversation about CS-2 wanting to purchase a large amount of crystal methamphetamine, between one-half pound and two pounds – the following week.

6. On October 29, CS-2 and LANDA-LEON met to discuss more details about how the transaction would be conducted, and they decided that it would be conducted on October 30 and the quantity would be one pound. On October 30, CS-2, at the direction of law enforcement, arrived at the South Minneapolis location where CS-2 and LANDA-LEON had met the previous day, and called LANDA-LEON to inform him that CS-2 was ready to purchase the one pound of crystal methamphetamine.

7. Law enforcement had instructed CS-2 to insist upon seeing the crystal methamphetamine before finalizing the transaction. Under this direction, CS-2 told LANDA-LEON CS-2 would not bring the payment until after LANDA-LEON had shown CS-2 the narcotics. After meeting with each other in person and exchanging several phone calls between approximately 11 a.m. and Noon, LANDA-LEON agreed to show CS-2 the pound of crystal methamphetamine and instructed CS-2 to meet him at 26<sup>th</sup> Street and 1st Avenue South. When CS-2 arrived at the location, LANDA-LEON entered CS-2's vehicle and instructed CS-2 where to drive next. Under LANDA-LEON's instruction, CS-2 drove surreptitiously, taking an indirect route to the K-Mart parking lot at Lake Street and 1<sup>st</sup> Avenue in South Minneapolis. After arriving in the parking lot, LANDA-LEON removed a package from the crotch area of his pants and

showed CS-2 what CS-2 believed to be the one pound of crystal methamphetamine the two had discussed. LANDA-LEON then left the package in the car with CS-2 and entered the K-Mart store. LANDA-LEON then left the K-Mart store and entered the SuperValu grocery store next door to K-Mart. CS-2 returned the crystal methamphetamine to LANDA-LEON while LANDA-LEON was inside the SuperValu grocery store, telling LANDA-LEON that CS-2 would then go and get the money to complete the transaction. CS-2 informed law enforcement that LANDA-LEON had the crystal methamphetamine in a bag of groceries in the store.

8. Law enforcement approached LANDA-LEON in the SuperValu store, where he was standing in the vestibule/breezeway between the entrance and exit to the store, identified themselves and placed him under arrest. During a subsequent search of the immediate area surrounding where LANDA-LEON was standing, law enforcement discovered two grocery bags; inside one of the bags, officers discovered a plastic container containing approximately 567 grams of a substance that subsequently field tested positive as crystal methamphetamine.

Based on the foregoing, there is probable cause to believe that on October 30, 2013, Isreal LANDA-LEON committed a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) (possession with intent to distribute controlled substances including crystal methamphetamine).

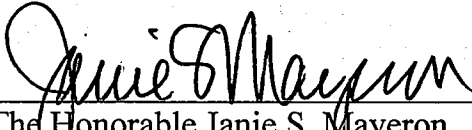
Further your Affiant sayeth not.



Paul A. Ford, Task Force Officer  
Drug Enforcement Administration

SUBSCRIBED and SWORN to before me

this 31<sup>st</sup> day of October, 2013.



The Honorable Janie S. Mayeron  
United States Magistrate Judge