

23 MAG 6533

UNITED STATES OF AMERICA

v.

RENNY ANTONIO PARRA PAREDES,
a/k/a "El Gallo,"

Defendant.

COMPLAINT

Violations of 21 U.S.C. § 846

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

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

COUNT ONE
(Conspiracy to Distribute Narcotics Resulting in Death)

1. From at least in or about July 2023 through at least in or about September 2023, in the Southern District of New York and elsewhere, RENNY ANTONIO PARRA PAREDES, a/k/a "El Gallo," the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RENNY ANTONIO PARRA PAREDES, a/k/a "El Gallo," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

4. The use of such controlled substance resulted in the death of Minor Victim-1 on or about September 15, 2023, in the Bronx, New York.

(Title 21, United States Code, Section 846.)

Overview

5. From at least in or about July 2023 through at least in or about September 2023, RENNY ANTONIO PARRA PAREDES, a/k/a “El Gallo,” the defendant, and others, including Grei Mendez (“Mendez”) and Carlisto Acevedo Brito (“Acevedo Brito”),¹ conspired to distribute fentanyl, **including at a children’s daycare center in the Bronx, New York (the “Daycare”).** There, despite the daily presence of children, including infants, PAREDES and his co-conspirators maintained large quantities of narcotics, including a kilogram of fentanyl stored on top of **children’s playmats**, and large quantities of suspected narcotics in hidden compartments known as **“traps” located in the floor of the room in which the children played and slept.** In addition, PAREDES and his co-conspirators maintained in the Daycare items purpose-built for the distribution of large quantities of narcotics, including so-called **“kilo presses,” which are designed for the re-compression of drugs in powder form commonly used by narcotics traffickers at “mills”** or other locations where narcotic drugs are broken down, combined with fillers or other narcotics, and portioned for sale. As a consequence of PAREDES’s drug conspiracy, on or about September 15, 2023, at the Daycare, four children, who were all under three years of age, appear to have experienced the effects of poisoning from exposure to fentanyl. Three of the children were hospitalized with serious injuries. The fourth child, a one-year-old boy, died.

Four Children Poisoned by Fentanyl at a Daycare Facility

6. Based on my participation in this investigation, my review of law enforcement reports and records, and communications I have had with other law enforcement officers, I know the following:

a. At approximately 2:40 p.m., on September 15, 2023, Mendez, who is the operator of the Daycare, called 911 to report that all three children in her care were unresponsive.

b. Shortly thereafter, an ambulance arrived at the Daycare and took the three children, whose ages ranged approximately between eight months to two years, to a nearby hospital. There, one of the children (**“Minor Victim-1”**), a one-year-old boy, was pronounced dead.

c. Medical professionals administered NARCAN² to the other two children (**“Minor Victim-2” and “Minor Victim-3”**). Minor Victim-2 and Minor Victim-3 required hospitalization for their injuries. An analysis of urine from one of the minor victims confirmed the presence of **fentanyl in the child’s body.**

d. A fourth child (**“Minor Victim-4,”** and, together with Minor Victims-1 through -3, the **“Minor Victims”**), who is approximately two years old, also attended the Daycare on or about September 15, 2023, and was picked up by a parent approximately two hours before Mendez’s 911 call. Upon noticing that the child was lethargic and not responsive, **Minor Vicim-4’s parent**

¹ Grei Mendez and Carlisto Acevedo Brito have been charged in a separate complaint, under docket number 23 Mag. 6444.

² NARCAN, or naloxone, is an over-the-counter nasal spray that has been approved by the Food and Drug Administration to reverse opioid overdose.

took Minor Victim-4 to a nearby hospital, where medical professionals administered NARCAN. Minor Victim-4's injuries required hospitalization.

e. With respect to each of the Minor Victims, medical professionals noted their symptoms and injuries appeared to be consistent with opioid poisoning. Additionally, with respect to Minor Victims-2, -3, and -4, medical professionals noted the children appeared to respond positively to the effects of the administration of NARCAN, consistent with their having experienced opioid poisoning.

Searches of the Daycare

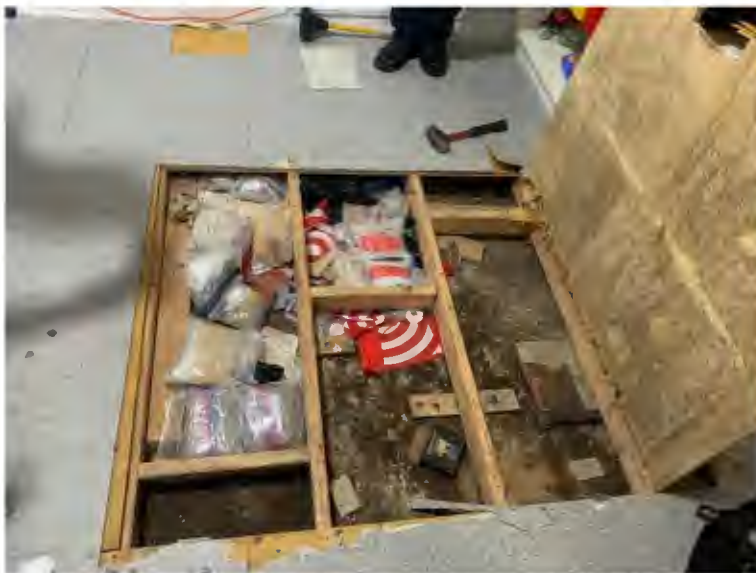
7. Based on communications I have had with other law enforcement officers, and my review of law enforcement reports and records, I have learned that:

a. On September 15, 2023, shortly after the Minor Victims were removed from the Daycare and treated by medical personnel, law enforcement officers searched the Daycare pursuant to a warrant. The Daycare operated out of a one-bedroom apartment consisting of a playroom, a bathroom, a kitchen, and a bedroom (the "Bedroom"). During the search, law enforcement officers found both large quantities of fentanyl as well as machinery and paraphernalia used to package narcotics.

b. In particular, in a hallway closet located near the Daycare bathroom, law enforcement officers found a packaged white, powdery substance weighing approximately one kilogram that field-tested positive for fentanyl. The fentanyl was located inside of a bag that was **stacked on top of pieces of a children's playmat**. Law enforcement officers also found two "kilo press" machines and accompanying machine parts, including at least one hydraulic press. Based on my training and experience, I know that kilo presses are used by narcotics traffickers to exert pressure and compress illegal narcotics into kilogram-sized "bricks" in preparation for distributing wholesale quantities of narcotics. Law enforcement officers found one additional kilo press in the Bedroom closet. Law enforcement officers further recovered packaging materials, such as vacuum bags and a vacuum sealer, including vacuum bags that appear to be consistent with the vacuum bag containing the above-described kilogram of fentanyl. The narcotics recovered and one of the recovered kilo presses are pictured below.



c. On or about September 21, 2023, law enforcement officers again searched the Daycare pursuant to another warrant. During the second search of the Daycare, law enforcement found two large traps—or concealed compartments—beneath the floorboards of the Daycare. The traps were under a significant portion of the floor in the space where the Minor Victims and other children who attended the Daycare played, slept, and ate. The traps contained tape; “kilo stamps”;³ plastic bags; and other tools and instruments which, based on my training and experience, are used to package, distribute, and traffic narcotics. In addition, multiple bags found inside the traps contained what appeared, based on my training and experience, to be narcotics. One of the traps is pictured below.



Mendez and Her Co-Conspirator Removed Evidence from the Daycare Prior to the Search

8. Based on my conversations with other law enforcement officers, my review of reports, my review of security footage from the exterior of the Daycare and the interior hallway outside of the Daycare, my review of a cellphone that Mendez gave law enforcement officers consent to search, and my participation in this investigation, I have learned the following about events that occurred prior to the arrival of emergency medical professionals.

a. According to Mendez’s call records and law enforcement reports:

i. Mendez called 911 regarding the unresponsive children at approximately 2:40 p.m. on or about September 15, 2023.

ii. Immediately *before* calling 911, Mendez placed three phone calls. The first was to another individual who worked with the Daycare at approximately 2:39 p.m. The second

³ Based on my training and experience, I know that “kilo stamps” are stamps, stickers, or the like used by individuals who traffic and distribute narcotics to mark or brand the narcotics that they distribute.

two were to an individual MENDEZ later identified as her husband (“CC-1”). MENDEZ’s first call to CC-1 was unanswered; her second call to CC-1 lasted just over ten seconds.

b. Several minutes before emergency personal arrived at the scene, surveillance footage shows CC-1 walking swiftly from the building next door to the Daycare, where he and Mendez resided, and into the Daycare. When CC-1 entered the Daycare, he was empty-handed. Approximately two minutes later, CC-1 exited the Daycare again moving swiftly, but carrying what appears to be two shopping bags weighted with contents. Instead of exiting through the front door, CC-1 exited out a back alley. And instead of following the paved alleyway behind the Daycare’s building, CC-1 hurried through overgrown grass and bushes to exit the area. Photographs of CC-1 hurrying out the rear of the Daycare’s building and then moving through the bushes to exit the area are below.



c. After speaking to 911 for approximately six minutes, beginning at approximately 2:52 p.m., Mendez placed several additional calls to CC-1. The last call took place at approximately 2:53 p.m. and lasted approximately one minute and 16 seconds.

d. Based on my training and experience as a law enforcement officer, I know that the timing of CC-1’s entrance and then swift exit out a back alleyway from the Daycare, where the Minor Victims were unresponsive and waiting for emergency assistance to arrive, and while carrying shopping bags, is consistent with the behavior of an individual attempting to remove materials from the Daycare to avoid their discovery by law enforcement.

The Investigation

9. In addition to the above-described evidence, based on my participation in the investigation, I have learned, among other things, the following:

Cellphone Contents

10. As described above, Mendez gave law enforcement officers consent to search certain electronic devices in her possession, including her cellphone. Based on my review of the content of those devices, I have learned the following:⁴

a. Mendez deleted approximately 21,526 messages from an encrypted messaging application on which she had exchanged messages with CC-1 between approximately on or about March 30, 2021 and September 15, 2023.

b. Based on my review of deleted encrypted messages that were able to be recovered during a forensic extraction of Mendez's **cellphone**, I know that Mendez sent CC-1 various messages while Mendez was with members of law enforcement later in the day on September 15, 2023, following the incident at the Daycare. In these messages, Mendez informed CC-1, at a phone number that Mendez identified as belonging to CC-1, that law enforcement was asking questions about him, including questions regarding his whereabouts. CC-1 instructed Mendez to tell law enforcement, among other things, that he was working. In addition, Mendez informed CC-1 that she told law enforcement that CC-1 was **"down there" and told him to go out and look for a lawyer.**⁵

c. Based on my training, experience, and involvement in this investigation, I believe that Mendez deleted messages with CC-1 after law enforcement responded to the Daycare.

11. After arriving at the Daycare, Acevedo Brito also gave law enforcement officers consent to search certain electronic devices in his possession. Based on my review of the content of those devices, I have learned that Acevedo Brito exchanged numerous messages with a contact **who goes by the name "El Gallo."** Those message exchanges confirm both Acevedo Brito's and "El Gallo's" involvement in trafficking narcotics with Mendez and CC-1.

a. For example, on or about August 22, 2023, Acevedo Brito received messages from **"El Gallo"** over the same encrypted messaging application used by Mendez.⁶ The messages stated, in sum and substance, that Acevedo Brito **should tell "viejo" that if he is going to take the garbage out, the police are out there on the side.** Based on my training and experience, I know that individuals involved in narcotics trafficking often take steps to evade law enforcement when disposing of materials related to the packaging and distribution of narcotics, because those items

⁴ The messages contained on both Mendez's and Acevedo Brito's **electronic devices were almost entirely in Spanish.** I have been assisted in reviewing the messages by members of law enforcement fluent in the Spanish language.

⁵ Based on my participation in this investigation, I know that CC-1 and Mendez resided together in an apartment located in an apartment building adjoining the building that housed the Daycare (**"Apartment-1"**). Accordingly, I understand Mendez's use of **"down there"** to refer to the Daycare.

⁶ The messages with **"El Gallo"** are attributed to CC-2 in the Complaint charging Mendez and Acevedo Brito. *See* 23 Mag. 6444. As described below and for the reasons that follow, the individual referred to as CC-2 in the Complaint charging Mendez and Acevedo Brito is RENNY ANTONIO PARRA PAREDES, a/k/a **"El Gallo,"** the defendant.

frequently contain narcotics residue or other packaging materials or implements that are tell-tale signs of a narcotics milling operation. Alternatively, based on my training and experience, I am aware that the reference to “garbage” could be a coded reference to quantities of narcotics. Additionally, in Acevedo Brito’s phone, the contact name associated with the number for CC-1 is “Viejo.” Accordingly, there is probable cause to believe that references to Viejo in the messages exchanged between Acevedo Brito and “El Gallo” are a reference to CC-1.

b. Similarly, on or about August 23, 2023, “El Gallo” sent Acevedo Brito an encrypted messaging application message asking, in sum and substance, whether he was sleeping, because “El Gallo” wanted Acevedo Brito to look outside and tell “El Gallo” if he saw the cops. In response, Acevedo Brito called “El Gallo.”

c. Furthermore, on or about September 12, 2023, “El Gallo” sent Acevedo Brito an encrypted messaging application message stating, in sum and substance, that he had left Acevedo Brito “una torta”⁷ on the table in a white bag. Acevedo Brito responded, in sum and substance, that he understood.

Cellphone Location Data

12. Based on my review of records provided by a telecommunications company, I know, among other things, the following:

a. The cellphone associated with the call number that Acevedo Brito had saved in his phone for “El Gallo” is subscribed to by “Renny Parra Paredes” (the “Paredes Cellphone”), with a billing address of Apartment-1—that is, the apartment in which Mendez and CC-1 resided in the building adjoining the Daycare’s building.

b. Cellphone location data obtained on the Paredes Cellphone pursuant to a warrant also confirms that in the weeks prior to the poisoning of the Minor Victims at the Daycare, the Paredes Cellphone was located in the vicinity of the Daycare and Apartment-1 (which are in adjacent buildings) on a daily basis. Since the poisoning of the Minor Victims, the Paredes Cellphone has not once hit on cellphone towers in the vicinity of the Daycare and Apartment-1.

c. Based on my training and experience and my participation in narcotics-related investigations, I believe that the fact that the user of the Paredes Cellphone has not returned to the vicinity of the Daycare since the poisoning of the Minor Victims after previously having been in the vicinity of the Daycare on a near-daily basis is consistent with the user of the Paredes Cellphone attempting to evade law enforcement detection in that area.

Arrest of RENNY ANTONIO PARRA PAREDES, a/k/a “El Gallo”

13. In the early morning hours of September 23, 2023, law enforcement officers using cellphone location data obtained pursuant to a warrant identified RENNY ANTONIO PARRA

⁷ Based on my training and experience and my conversations with other law enforcement officers, I know that “torta” means “sandwich” or “cake” in Spanish. Furthermore, based on my training and experience, I know that “cake” is often used to refer to a kilogram of narcotics.

PAREDES, a/k/a “El Gallo,” the defendant, as the user of the Paredes Cellphone and placed him under arrest. At the time of PAREDES’s arrest, the Paredes Cellphone was in his hand. Based on my review of both the Paredes Cellphone and a second cellphone in PAREDES’s possession following PAREDES’s consent to search those cellphones, I know that that the data on both cellphones appears to have been almost entirely erased and that the phones have only minimal content.⁸

14. Additionally, based on a review of the contents of Mendez’s phone, I know that Mendez’s phone had accessed a social media account with the handle “ElGallo59.” The appearance of an individual in a photograph posted to social media who has been tagged as “ElGallo59” resembles the appearance of RENNY ANTONIO PARRA PAREDES, a/k/a “El Gallo,” the defendant.

15. Furthermore, following his arrest, and after being read his *Miranda*-rights, RENNY ANTONIO PARRA PAREDES, a/k/a “El Gallo,” the defendant, agreed to speak with law enforcement officers. During that interview, PAREDES lied to law enforcement. For example, PAREDES initially minimized the frequency of his visits to the Daycare, but later admitted that he sometimes went to the Daycare on Wednesdays and Saturdays.⁹ PAREDES also stated that he had not gone to the Daycare since the days leading up to the poisoning of the Minor Victims at the Daycare because he was afraid that law enforcement was going to arrest him. In addition, PAREDES also lied about his whereabouts earlier in the day, claiming that he had been at a hotel. When confronted with cellphone location data proving that statement false, PAREDES stated that he had actually been staying at an apartment with his aunt (“Apartment-2”) for the past ten days—that is, approximately since the poisoning of the Minor Victims at the Daycare. PAREDES then consented to a search of Apartment-2, but advised law enforcement they would require his aunt to permit the search when law enforcement arrived. At the time of his arrest, PAREDES was in possession of the keys to Apartment-2.

16. A short while later, still in the early morning hours of September 23, 2023, members of law enforcement arrived at Apartment-2 and observed that no one was present. Members of law enforcement subsequently searched Apartment-2 pursuant to a warrant, and found, among other things:

a. Two reusable shopping bags on the shelf of a hallway closet. The hallway closet was empty aside from the two reusable shopping bags, one red and one black (the “Black Bag” and the “Red Bag”, respectively).

b. The Red Bag contained tools and instruments, such as strainers, tape, a grinder, plastic bags, a digital scale, and a stamp that read “RED DAWN” which, based on my training and

⁸ Based on my training and experience, I believe this indicates that both phones were recently reset or that their contents were otherwise recently deleted.

⁹ PAREDES also denied having anything to do with the drugs at the Daycare and admitted that he had not returned to Apartment-1 since the poisoning at the Daycare because he was concerned law enforcement would think he was involved in the conspiracy.

experience, I know are used to prepare and distribute narcotics. Photos of the Red Bag and at least some of its contents as well as the “RED DAWN” stamp are below.



c. The Black Bag contained, among other things, a black plastic bag with several brown cardboard boxes inside, tape, a digital scale, and a white cardboard box. The brown cardboard boxes contained empty glassine envelopes **that had been stamped with the text “RED DAWN”**. Based on my training and experience, I know that glassine envelopes, tape, and digital scales are used to prepare narcotics and package them for distribution. The white cardboard box contained two clear Ziplock bags filled with a greyish powder. Based on my training and experience, the greyish powder inside of the two clear Ziplock bags appears to be narcotics. The white cardboard box also contained a rectangular, brick-shaped package wrapped in brown paper. Based on my training and experience, the rectangular, brick-shaped package is consistent with the manner in which narcotics are packaged for distribution in kilogram quantities. Photos depicting the Black Bag and at least some of its contents are below.



d. Based on my participation in this investigation, I know that the traps in the Daycare contained glassine envelopes which appear to bear the same “RED DAWN” stamp as those found in the Black Bag. Based on my training and experience, I know that participants in the same narcotics conspiracy frequently use the same stamps to advertise their particular brand to customers. The photo below to the left depicts the glassines found in the trap in the Daycare. The photo below to the right depicts the glassines found in the Black Bag in Apartment-2.



WHEREFORE, I respectfully request that RENNY ANTONIO PARRA PAREDES, a/k/a
the defendant, be imprisoned or bailed, as the case may be.

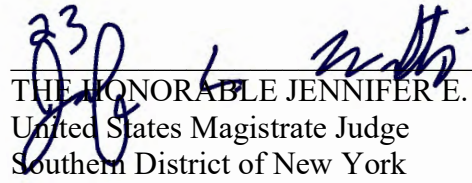
“El Gallo,”



*signed by Judge
with permission
of Agent*

KYLE HARRELL
Special Agent
Drug Enforcement Administration

Sworn to before me telephonically
this ___ day of September, 2023.



THE HONORABLE JENNIFER E. WILLIS
United States Magistrate Judge
Southern District of New York