

CNC:MEL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M 13-622**

UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 21, U.S.C., § 841)

ADRIAN BONILLA,

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

SCOTT KNOX, being duly sworn, affirms and states that he is a Special Agent with the Drug Enforcement Administration (the "DEA") duly appointed according to law and acting as such.

Upon information and belief, on or about July 15, 2013, within the Eastern District of New York, the defendant ADRIAN BONILLA did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup>Because the purpose of this affidavit is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I have been a Special Agent with the Drug Enforcement Administration ("DEA") since approximately 1996. I am currently assigned to a DEA group based in New York City. During my tenure as a Special Agent with the DEA, I have participated in numerous narcotics investigations, during the course of which I have conducted physical and wire surveillance, executed search warrants, and reviewed and analyzed numerous taped conversations and records of drug traffickers. Through my training, education and experience -- which has included debriefing numerous cooperating drug traffickers, conducting numerous searches of locations where drugs and money have been found, and conducting surveillance on numerous occasions of individuals engaged in drug trafficking -- I have become familiar with the manner in which illegal drugs are imported and distributed, the method of payment for such drugs, and the efforts of persons involved in such activity to avoid detection by law enforcement.

2. The facts set forth in this affidavit are based, in part, on information that I have learned from review of written documents prepared by, and conversations with, members of the DEA. Unless otherwise noted, I have not distinguished between those facts of which I am personally aware and those that have been provided to me by other law enforcement officers. The facts set forth in this affidavit are also based on my

personal knowledge and observations, and my training and experience.

3. On July 12, 2013, the Honorable A. Kathleen Tomlinson, a United States Magistrate Judge in the Eastern District of New York, issued a search warrant authorizing the search of 14 Shelley Place, 2nd Floor Apartment, Huntington Station, New York 11746 (hereinafter the "Premises"). As set forth in the search warrant affidavit, DEA agents examined a black trash bag outside of the Premises and found numerous clear plastic baggies containing a white powdery residue, vacuum seal bags containing a white powdery residue, paper towels containing a white powdery residue, empty plastic and duct tape wrappings, two empty boxes of baking soda, and documents, including a receipt and an invoice, with the name "Adrian" and "Adrian BONILLA" on them. I conducted two separate field tests of white powdery residue from the clear plastic baggies and paper towels, and the results were positive for the presence of cocaine and/or cocaine base.

4. On July 15, 2013, DEA agents conducted surveillance of the Premises. At approximately 6:35 p.m., I observed defendant ADRIAN BONILLA enter the Premises and then leave the Premises approximately an hour later, driving a sedan. A traffic stop was then conducted of BONILLA by a marked New York State police car. During a search of BONILLA, I found

approximately 100 grams of a substance believed to be cocaine in his right front pocket. BONILLA was arrested and advised of his Miranda rights.

5. DEA agents executed the search warrant of the Premises at approximately 8:00 p.m.


6. During the course of the search, agents recovered numerous plastic bags from various areas of the apartment containing cocaine, one plastic bag containing a small amount of cocaine base, packaging materials and two digital scales. A DEA agent conducted a field test of the contents of one of the plastic bags of suspected cocaine and it tested positive for cocaine. DEA agents later weighed the plastic bags containing cocaine and the gross weight is approximately 11,000 grams (11 kilograms) of cocaine.

7. In addition, DEA agents found approximately six lock boxes in the apartment, concealed behind new sheet rock, believed to contain approximately \$3,000,000 in U.S. currency.<sup>2</sup>

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<sup>2</sup> Furthermore, during the search of the Premises agents recovered documentation bearing the name of ADRIAN BONILLA's common law wife, with whom he currently resides at a nearby residence. Moreover, the deed to the Premises is in BONILLA's wife's name.

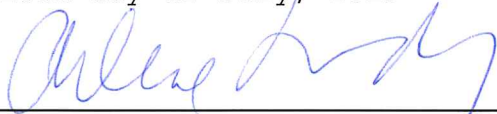
WHEREFORE, your affiant respectfully requests that  
defendant ADRIAN BONILLA be dealt with according to law.



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SPECIAL AGENT SCOTT KNOX  
Drug Enforcement  
Administration

Sworn to before me this  
16th day of July, 2013



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HONORABLE ARLENE R. LINDSAY  
U.S. MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK