

AO 91 (Rev. 11/11) Criminal Complaint

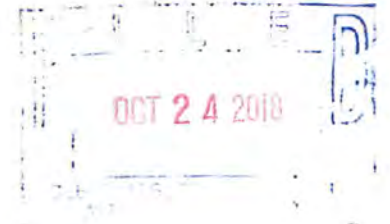
UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

United States of America
v.
LUIS RAFAEL TAVAREZ, a/k/a "El Primo,"
MANNY LIZARDO, and
LUIS M LIRIANO-TORIBIO

Case No. 1:18-mj-510



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 23, 2018 in the county of Fairfax in the
Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 846, 841(a)(1), and
841(b)(1)(A)(ii)

Conspiracy to Distribute and Possess with Intent to Distribute 5 Kilograms or
More of Cocaine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSA Raj Parekh

Complainant's signature

Daniel Son, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/24/2018

/s/
John F. Anderson
United States Magistrate Judge

Judge's signature

City and state: Alexandria, Virginia

The Hon. John F. Anderson

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)

v.)

LUIS RAFAEL TAVAREZ,)
a/k/a "El Primo,")

MANNY LIZARDO, and)

LUIS M LIRIANO-TORIBIO)

Defendants.)

Case No. 1:18-mj-510



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Daniel Son, Special Agent of the Drug Enforcement Administration, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I submit this affidavit in support of a criminal complaint charging LUIS RAFAEL TAVAREZ, a/k/a "El Primo," MANNY LIZARDO, and LUIS M LIRIANO-TORIBIO with conspiracy to distribute and possess with intent to distribute a controlled substance, which was in fact five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)(ii).

2. I am a Special Agent with the Drug Enforcement Administration ("DEA"). I have been employed as Special Agent with the DEA since 2015. I was previously assigned to the New York Division Tactical Diversion Squad. Since 2017, I have been assigned to the Washington Division Office Tactical Diversion Squad. I have participated in the execution of

numerous search warrants and have sworn to numerous affidavits in support of arrest warrants and search warrants for illegal narcotics, paraphernalia related to the use of illegal narcotics, monies or proceeds derived from the sale of narcotics, and records, ledgers and documents pertaining to the purchase and sale of controlled substances.

3. I have conducted and participated in numerous narcotics-related investigations resulting in the arrest and conviction of drug distributors, and seizures of controlled substances. Many of these investigations have involved the distribution and use of cocaine, cocaine base, heroin, and 3, 4 methylenedioxymethamphetamine (MDMA), fentanyl, oxycodone, hydrocodone oxymorphone, buprenorphine, alprazolam, and amphetamine mixtures. I have received extensive training in drug identification, drug distribution methods, and drug enforcement techniques from both federal and state agencies. As a result, I am familiar with the use, effects, distribution techniques, appearance, and method of manufacture of controlled substances.

4. I am familiar with the facts and circumstances of this investigation from: (a) my personal knowledge of the investigation; (b) observations of other law enforcement officers; (c) information provided to me by other law enforcement officials; and (d) information otherwise obtained by credible and reliable sources. This affidavit is being submitted for the limited purpose of obtaining a criminal complaint. As a result, it does not include each and every fact observed by me or known to the government. When I assert that a statement was made by an individual, that statement is described in substance and in part, but my assertion is not intended to constitute a verbatim recitation of the entire statement. All observations referenced below that were not personally made by me were related to me by the persons who made such observations.

BACKGROUND

5. Throughout the course this investigation, law enforcement utilized a confidential source (hereinafter, "CS") and undercover law enforcement officers from the DEA and the Virginia State Police (hereinafter, "UCs") to obtain information. Both the CS and UCs will be referenced throughout this affidavit in the masculine gender regardless of their true gender.

6. When possible, statements made by the CS have been corroborated through various investigative techniques, to include analysis of phone toll records, recorded phone conversations, and various surveillance techniques. The CS has provided information to the DEA in exchange for monetary payments in connection with numerous investigations. The CS does not have any criminal convictions. To the best of my knowledge, none of the information that the CS has provided to law enforcement has proved to be false, misleading or inaccurate in any material respect. For these reasons, I have deemed the CS's information to be reliable.

PROBABLE CAUSE

7. Through debriefings with the CS, law enforcement learned that LUIS RAFAEL TAVAREZ, a/k/a "El Primo," traveled from New York to the Eastern District of Virginia on or about October 23, 2018 to obtain 100 kilograms of cocaine (50 kilograms up front, and another 50 kilograms on consignment) in exchange for over \$1 million United States dollars in cash, and that MANNY LIZARDO and LUIS M LIRIANO-TORIBIO traveled to the Eastern District of Virginia to assist TAVAREZ in trafficking and/or transporting the narcotics.

8. On or about September 5, 2018, a co-conspirator from the Dominican Republic

(hereinafter, "CC-1") contacted the CS through an encrypted electronic communications platform. Based on prior experience and narcotics-related transactions, the CS knows CC-1 to be a multi-kilogram cocaine broker in the Dominican Republic who can set up meetings with the CS and potential buyers. In substance and in part, CC-1 told the CS to contact a cell phone number with a New York area code and to ask for an individual named "el pri" on behalf of "Jav," who is a known person to both el pri and CC-1. CC-1 advised that el pri wants "40 total." Based on my knowledge of this investigation, I believe that "el pri" is shorthand for "El Primo." CC-1 told el pri that the price would be "26." CC-1 told the CS that the number 26 was quoted to el pri because he is a friend of CC-1. Based on my training and experience, I believe that in this message, CC-1 is referring to El Primo's desire to obtain 40 kilograms of a controlled substance, which was being offered to him at a discounted price of \$26,000 per kilogram.¹

9. On or about September 5, 2018, under the direction of law enforcement, the CS placed a recorded call to the phone number that CC-1 provided to the CS earlier that day. During this phone call, the CS and El Primo (later identified by law enforcement as TAVAREZ) introduced themselves to each other.

10. On or about September 6, 2018, under the direction of law enforcement, the

¹ The phone conversations, text messages, and in-person conversations referenced throughout this affidavit occurred primarily, if not exclusively, in Spanish. The summaries of these discussions are not intended to be verbatim translations. The summaries do not include all statements or topics covered during the course of the communications. At various points in this affidavit, I have included my interpretation of words and phrases used in the communications. My interpretations are based on the contents and context of the communications, events occurring before and after the communications, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents who are involved in this investigations.

CS placed a recorded phone call to TAVAREZ. In substance and in part, the CS stated that he was in Virginia. TAVAREZ told the CS that he was in New York, but that he had family in Alexandria, Virginia. TAVAREZ stated that he could meet with the CS in Virginia, but that the meeting would have to be early because TAVAREZ would return to New York on the same day. The CS stated to TAVAREZ that he would send him a text message with the name of the city of where the meeting would occur the following day.

11. On or about September 7, 2018, the CS sent a text message to TAVAREZ and wrote "Lorton," to indicate the meeting location. The CS asked TAVAREZ to contact the CS when he was nearby. The CS subsequently sent a text message to TAVAREZ with the address of a shopping center in Lorton, Virginia where meeting would occur.

12. On or about September 7, 2018, at the direction of law enforcement, the CS and a DEA Special Agent acting in an undercover capacity (hereinafter, "UC-1") met with TAVAREZ at a shopping center in Lorton, Virginia, within the Eastern District of Virginia. During the meeting, TAVAREZ discussed purchasing 80 kilograms of cocaine, which would be transported from Northern Virginia to the New York City area. The meeting was surveilled and recorded by law enforcement. Law enforcement observed that TAVAREZ, who arrived to this meeting alone, drove a gold in color BMW sedan bearing New York State license plates HVW-7818.

13. During the September 7, 2018 meeting, the CS and UC-1 negotiated the sale of 50 kilograms of cocaine for \$25,000 per kilogram with TAVAREZ, and pursuant to TAVAREZ's request, to give another 30 kilograms of cocaine to him on consignment. During the same meeting, TAVAREZ stated to the CS that he conducts "business" from the Dominican Republic to Puerto Rico to mainland U.S. Based on my training and experience, I

believe that TAVAREZ was explaining to the CS that he obtains illegal drugs from a source of supply in the Dominican Republic, and subsequently transports (or causes to be transported) the drugs through Puerto Rico, with an ultimate destination within the United States. TAVAREZ told the CS that he had "eighteen" coming into New York later that day. Based on my training and experience, I believe that TAVAREZ was referring to 18 kilograms of a controlled substance. TAVAREZ also asked the CS what he was going to do with the money from the sale because TAVAREZ knows people in Puerto Rico who could transport the money back to the Dominican Republic for the CS.

14. Also during the September 7, 2018 meeting, TAVAREZ told the CS that he would return to Virginia in the near future with three to four vehicles and asked the CS for a clandestine location where he can move the kilograms into the vehicles. TAVAREZ stated to the CS that he would separate the money that he would bring to buy the drugs in at least two vehicles that would travel from New York to Virginia. TAVAREZ additionally told the CS that he would return to Virginia on Monday (September 10) or Tuesday (September 11) to conduct the transaction. Although this meeting did not occur as planned on either day, TAVAREZ subsequently told the CS that he would return in the near future and to "please keep the kids safe." Based on my training and experience, I believe that TAVAREZ was asking the CS to hold the 80 kilograms of cocaine for him until he could travel to Northern Virginia to buy the illegal drugs from the CS.

15. On or about September 25, 2018, TAVAREZ placed a recorded phone call to the CS from a different phone number than he had previously been using to communicate with the CS. The CS confirmed to law enforcement that the individual who contacted the CS was indeed TAVAREZ. TAVAREZ stated to the CS that this phone number, which similarly

contained a New York area code, was his new number and that he disconnected the previous phone. TAVAREZ told the CS in prior conversations that he disconnects his phones approximately every 30 days. Based on my training and experience, I know that drug kingpins and dealers often change their phone numbers and/or use multiple phones to minimize the risk of law enforcement detection when conducting narcotics trafficking-related activities. TAVAREZ stated to the CS that he was only using the previous phone number to communicate with the CS, and that this new phone number was also going to be used to contact the CS.

16. During the September 25, 2018 recorded phone conversation, TAVAREZ stated to the CS that he wanted to meet the CS to conduct the transaction that was previously negotiated (referring to the above-described September 7, 2018 meeting). TAVAREZ also stated that he would be available to meet the CS on either September 27 or September 28, but that September 28 worked better for him. TAVAREZ further stated that he would be able to get his guys together for this upcoming meeting with the CS. Based on my training and experience, and involvement in this investigation, I believe that TAVAREZ was indicating to the CS that he would make the necessary logistical and personnel arrangements, and would have the requisite amount of funds ready in time for this meeting.

17. On or about September 27, 2018, under the direction of law enforcement, the CS sent a text message to TAVAREZ indicating that the CS would be available to meet with him on September 28 at 1:00 PM. The CS also told TAVAREZ that he could not meet any later than 1:00 PM because the CS was not feeling well, and therefore had to catch a flight to the CS' country of origin to see doctors and be admitted to a hospital for a few days. TAVAREZ then called the CS and stated that he was available to meet on September 28 and

was working on getting a vehicle ready for the transaction.

18. On or about September 28, 2018, under the direction of law enforcement, the CS sent a text message to TAVAREZ to confirm whether the meeting was still taking place, and if so, at what time. TAVAREZ replied with a phone call to the CS during which he asked the CS if he had a vehicle for TAVAREZ to use for the transaction. Based on my training and experience, I believe that TAVAREZ was seeking an additional vehicle, known to narcotics traffickers as a "trap vehicle," to split the large amounts of cocaine into separate cars in order to minimize the risk of potentially losing the entire shipment or load of the drugs in the event that law enforcement stopped one of the vehicles while TAVAREZ and any co-conspirators were driving back to New York. Under the direction of law enforcement, the CS told TAVAREZ there were two vehicles he could use, one which is a minivan and the other a sedan. TAVAREZ replied that he preferred the minivan.

19. On or about September 28, 2018, the CS attempted to call TAVAREZ in the afternoon, but was not able to reach him. TAVAREZ called the CS later that afternoon and told the CS that he was on his way to Virginia. TAVAREZ also asked the CS to wait for him. Under the direction of law enforcement, the CS rescheduled the meeting given that the meeting would now occur much later in the evening given that TAVAREZ was driving from the New York area later than anticipated and would likely hit rush hour traffic while driving to Virginia. Thus, a decision was made to cancel the September 28, 2018 meeting because visibility during the operation would have been limited, thereby impacting law enforcement safety concerns. TAVAREZ sent a text message to the CS and apologized for the delay. TAVAREZ also expressed that he really wanted the transaction to occur that day, but understood that health comes first.

20. On or about October 11, 2018, TAVAREZ sent a text message to the CS from yet another new phone number. Similar to the prior phone numbers, this new number also contained a New York area code. TAVAREZ asked, via an encrypted electronic communications platform, how the CS and his family were doing. TAVAREZ also asked the CS to call him when the CS is available.

21. On or about October 14, 2018, the CS replied to TAVAREZ via an electronic communications platform that the CS was doing much better. TAVAREZ replied, in sum and substance, very good. Shortly after these text messages were exchanged, the CS called TAVAREZ and stated that he plans to travel back to Virginia in the near future to conduct the transaction that was previously negotiated (referring to the above-described September 7, 2018 meeting described). During this phone call, TAVAREZ confirmed to the CS that he was still interested in conducting this transaction.

22. On or about October 19, 2018, the CS placed a recorded call to TAVAREZ and asked if the previously discussed price was still good (referring to \$25,000 per kilogram of cocaine). The CS responded in the affirmative and advised TAVAREZ that he is a man of his word. TAVAREZ then told the CS that prices are going down and that he had recently purchased some (referring to illegal drugs) at a very high rate from which he was still trying to recover. The CS discussed meeting TAVAREZ on either Tuesday (October 23) or Wednesday (October 24). The CS then asked TAVAREZ when he would return to the Northern Virginia area if they decided to meet on Tuesday (October 23). TAVAREZ replied that he would return in approximately three weeks. Based on my knowledge of this investigation, TAVAREZ was indicating to the CS that he would seek to purchase additional kilogram levels of cocaine during a future meeting.

23. During the October 19, 2018 recorded phone conversation, the CS advised TAVAREZ that he has what they previously discussed (referring to the kilogram quantities of cocaine and the additional “trap vehicle” that TAVAREZ previously asked the CS to provide). TAVAREZ asked the CS about the type of vehicle that he would provide to him, and also asked how many “pants” the vehicle holds (referring to the amount of cocaine that the vehicle could store). The CS informed TAVAREZ that it is a family vehicle and that TAVAREZ would have space for anything he needs.

24. On or about October 21, 2018, the CS placed a recorded call to TAVAREZ to confirm that they were still meeting on Tuesday (October 23). Additionally, the CS verified that he would have the previously-requested vehicle ready for TAVAREZ. Based on my knowledge of this investigation, the CS was referring to a vehicle with a hidden compartment to ensure that TAVAREZ could conceal the cocaine while it was being transported from Northern Virginia to the New York area. TAVAREZ told the CS that he would contact him the next day to go over the details.

25. On or about October 22, 2018, TAVAREZ contacted the CS through an encrypted electronic communications platform. TAVAREZ asked the CS to provide an address for the meeting location. The CS told TAVAREZ that the meeting would occur in the city of Fairfax. TAVAREZ told the CS to be ready because he wanted to return early (referring to his desire to return to the New York area with the large shipment of cocaine).

26. On October 23, 2018, TAVAREZ called the CS and stated that he was departing at approximately 6:30 AM, which would put him in Northern Virginia in or about four hours from then. Law enforcement mobile surveillance units subsequently observed TAVAREZ’s gold BMW sedan traveling from Maryland to Northern Virginia. When the

BMW arrived in Fairfax County, Virginia, mobile surveillance units followed the vehicle and observed that it parked at a 7-Eleven store in the vicinity of INOVA Fairfax Hospital. A white in color Honda Accord was subsequently observed by law enforcement in close proximity to the gold BMW. Law enforcement also observed that the drivers of both vehicles (later identified as LIZARDO and TAVAREZ) were speaking to each other in the parking lot of the 7-Eleven.

27. During early afternoon on October 23, 2018, the CS and a Special Agent from the Virginia State Police acting in an undercover capacity (hereinafter, "UC-2") met TAVAREZ in the lobby of a Marriott hotel located in Vienna, Virginia, which is within the Eastern District of Virginia. TAVAREZ greeted the CS, and the CS introduced him to UC-2. TAVAREZ began to explain a visible injury on his head, which he claimed was accidentally inflicted by a woman who got carried away during an intimate encounter. All three individuals laughed while this vignette was recounted. They subsequently walked to a private sitting booth located in the hotel lobby to continue their conversation. There, TAVAREZ began to discuss personal vices. TAVAREZ shared that he is unable to lie and that his vice is alcoholic beverages. UC-2 responded that his vice is women. Both TAVAREZ and the CS laughed, and TAVAREZ commented that women are every man's vice.

28. At this point, the CS began to discuss the deal with TAVAREZ. TAVAREZ advised the CS that he brought the money with him. The CS indicated that he would stay with TAVAREZ at the hotel to count the money, while UC-2 would take TAVAREZ's guys to another location where the drugs were located. TAVAREZ then called LIZARDO and told him to drive to the hotel to ensure that he and the passenger of the vehicle could follow UC-2's vehicle to pick up the drugs. UC-2 observed that LIZARDO was driving the same gold

BMW sedan with New York State license plates that TAVAREZ drove to the above-described September 7, 2018 meeting. The passenger of the vehicle was later identified as LIRIANO-TORIBIO.

29. While TAVAREZ was outside of the Marriott hotel, UC-2 observed that he had opened the trunk of the white Honda Accord, which contained visible bundles of money inside a black bag that TAVAREZ was in the process of handling. At this point, TAVAREZ and the CS went inside the Marriott to a hotel room so that the CS could count the money that TAVAREZ brought with him. According to the CS, at some point prior to the October 23, 2018 meeting, TAVAREZ indicated that he wished to obtain 100 kilograms of cocaine on this trip (50 kilograms up front, and another 50 kilograms on consignment; an increase of 20 kilograms from the previously-negotiated amount of 80 kilograms) in exchange for over \$1 million dollars in cash. TAVAREZ also told the CS at some point leading up to this meeting that he would bring the remaining cash when he returns the trap vehicle. The below photographs depict two separate boxes of cash that TAVAREZ provided to the CS inside the hotel room on October 23, 2018. According to an unofficial count of the money by the CS, TAVAREZ brought over \$1 million United States dollars with him.²

² As of the time of the filing of this affidavit, an official count of the money that TAVAREZ brought with him has not been conducted. However, TAVAREZ told the CS that he was short by "100." Based on my knowledge of the investigation, I believe that TAVAREZ was indicating to the CS that he was short \$100,000 given the previously negotiated price of \$25,000 per kilo for 50 kilos of cocaine – which would cost \$1.25 million. Using that calculation, TAVAREZ would have brought approximately \$1.15 million in cash to the hotel.

Box #1



Box #2



30. UC-2 subsequently began driving to the area in which the cocaine was located, which was the second level of the Home Depot parking garage located in Fairfax, Virginia. At this time, law enforcement mobile surveillance units observed the gold BMW vehicle following UC-2's vehicle. Upon arrival to the Home Depot, UC-2 parked next to a vehicle that was driven there by a DEA Special Agent acting in an undercover capacity (hereinafter, "UC-3"). UC-2 then observed the driver and passenger of the gold BMW exit the vehicle. The passenger (later identified as LIRIANO-TORIBIO) greeted UC-2 with a nod, and the driver (later identified as LIZARDO) walked briskly over to UC-2. UC-2 and LIZARDO then walked to UC-3's vehicle. UC-2 signaled to UC-3 to open the trunk of the vehicle.

31. UC-2 then unzipped two duffle bags that were located inside the trunk of UC-3's vehicle, which contained a total of 20 kilograms of cocaine and was made visible to the LIZARDO.³ UC-2 grabbed one of the duffle bags and attempted to hand it to LIZARDO. LIZARDO stated that he needed to test the drugs first. UC-2 asked LIZARDO where he wanted to test them. LIZARDO advised he wished to conduct his test inside UC-3's vehicle. UC-2 then placed one of the duffle bags containing approximately 10 kilograms of cocaine in the center of the back seat of UC-3's vehicle. LIZARDO opened the rear passenger door and sat directly behind the passenger seat. LIZARDO then asked UC-2 if he had a knife to puncture a package containing one kilogram of cocaine in order to test it. UC-2 supplied LIZARDO with a pocket knife. UC-2 then observed LIZARDO grab and manipulate a package containing one kilogram of cocaine. At this time, UC-2 gave a pre-arranged audible

³ For safety purposes, law enforcement opted to bring 20 kilograms of cocaine to this meeting, rather than 100 kilograms. If any co-conspirator involved in this transaction probed the UCs regarding the whereabouts of the remaining 80 kilograms, the UCs were instructed to inform them that the remaining drug supply was located across the street in a storage unit.

and visible arrest signal to law enforcement units that were monitoring this meeting. Both LIZARDO and LIRIANO-TORIBIO were quickly arrested and taken into custody without incident. TAVAREZ was also arrested and taken into custody at the Marriott hotel shortly after he brought what has been estimated to be over \$1 million United States dollars in cash to the CS.

32. TAVAREZ and LIZARDO invoked their *Miranda* rights during separate post-arrest attempted interviews, and both individuals refused to speak to law enforcement. After LIRIANO-TORIBIO was *Mirandized*, he voluntarily agreed to waive his rights and answer questions. In substance and in part,⁴ LIRIANO-TORIBIO stated that he has been a barber for TAVAREZ for approximately two to three years. Less than two months ago, he learned that TAVAREZ was a drug dealer. Prior to this time, his impression was that TAVAREZ was a drug dealer, but he stated that he did not know for certain until recently.

33. LIRIANO-TORIBIO further stated that, approximately three weeks ago, he asked for some work and TAVAREZ offered him \$5,000.00 to pick up a car in the New York area and drive it to Virginia. LIRIANO-TORIBIO admitted that he knew TAVAREZ's request was drug-related. On October 22, 2018, LIRIANO-TORIBIO parked TAVAREZ's gold BMW vehicle in or near Bronx, New York.

34. According to LIRIANO-TORIBIO, TAVAREZ called him at approximately 5:00 AM on October 23, 2018 and asked him to drive the gold BMW to Virginia. LIRIANO-TORIBIO drove the vehicle from New York to Delaware, at which point he met up with


⁴ LIRIANO-TORIBIO spoke Spanish during the *Mirandized* interview. Given that a report of this interview has not yet been prepared, the statements attributed to LIRIANO-TORIBIO are set forth in this affidavit in summary form only based on conversations that I have had with a DEA Supervisory Special Agent who participated in the interview.

TAVAREZ. According to LIRIANO-TORIBIO, the other guy (referring to LIZARDO) got into the gold BMW in Delaware. LIRIANO-TORIBIO stated he has met LIZARDO twice – once at the barbershop and the second time on October 23, 2018. LIRIANO-TORIBIO stated that TAVAREZ gave him \$500.00 about a week ago to help with his rent and assumed that TAVAREZ would deduct this money from the amount that TAVAREZ offered to provide him in connection with the narcotics trafficking-related trip to Northern Virginia.


35. Based on my knowledge of the investigation and the observations of other law enforcement officials, I believe that TAVAREZ, LIZARDO, and LIRIANO-TORIBIO acted in concert in order to take possession of a large shipment of cocaine in Northern Virginia, which they planned to take back to New York for further distribution. TAVAREZ served as the main point of contact for the operation, while LIZARDO's involvement became clear when he inspected and attempted to test the cocaine. Finally, LIRIANO-TORIBIO admitted that he was aware that the purpose of the trip was to take possession of controlled substances, and that he voluntarily joined the group and participated in the trip in exchange for thousands of dollars.

CONCLUSION

36. Based on the facts set forth above, I submit there is probable cause to believe that, on or about October 23, 2018, within the Eastern District of Virginia and elsewhere, LUIS RAFAEL TAVAREZ, a/k/a "El Primo," MANNY LIZARDO, and LUIS M LIRIANO-TORIBIO conspired to distribute and possess with intent to distribute a controlled substance, which was in fact five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)(ii).


Daniel Son
Special Agent
Drug Enforcement Administration

Sworn and subscribed to before me this 24th day of October, 2018.


_____/s/_____
John F. Anderson
United States Magistrate Judge
The Honorable John F. Anderson
United States Magistrate Judge