

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

1. Dedwin Cruz-Rivera,
a/k/a "Cua";
2. Eric Matos,
a/k/a "Eri";
3. Miguelina Mejia Ruiz,
a/k/a "Doris Mejia";
4. Manuel Romero-Gonzalez,
a/k/a "Pablo,"
a/k/a "Pololo,"
a/k/a "Emanuel Cruz-Sanchez,"
a/k/a "Louis Ramos-Avila";
5. Maria Elena Ocasio,
a/k/a "Nana";
6. Christian Sostre,
a/k/a "Cristian";
7. Cory S. Nickerson;
8. Oniel Rivera;
9. Julio C. Ocasio,
a/k/a "J.C.";
10. Xavier Ramos,
a/k/a "Nuni";
11. Maria Rodriguez;
12. William M. Rodriguez;
13. Lindsay Ann Belisle;
14. John A. Gray, Jr.;

Criminal No. 15-CR-10302-GAO

- 15. Jose O. Perez;)
-)
- 16. Kelly Patterson;)
-)
- 17. Jorge Vega;)
-)
- 18. Jose A. Rodriguez;)
-)
- 19. Christopher Perez;)
-)
- 20. Steven M. Enos;)
-)
- 21. Philip Malaguti;)
-)
- 22. Luz Gonzalez,)
- a/k/a "Tita";)
-)
- 23. Francis Gonsalez-Romero,)
- a/k/a "Tatin,")
- a/k/a "Juan Carlos Melendez)
- Mejias";)
-)
- 24. Kelly Jean Gagnon; and)
-)
- 25. Joseph W. Parsons,)
- a/k/a "Junior,")
-)
-)
- Defendants.)

DETENTION AFFIDAVIT

I, Special Agent Kevin C. Hersey, being duly sworn, state as follows:

1. I am a Special Agent with the United States Department of Justice, Drug Enforcement Administration ("DEA"). I have been so employed since 1989. I have been assigned to the New England Field Division of the DEA since 1997. Prior to my current assignment, I was assigned to the New York Field Division of the DEA.

2. My primary duties as a Special Agent with the DEA include the investigation of organized narcotics traffickers. During my tenure as a DEA Special Agent, I have worked on

hundreds of drug investigations. Many of these investigations involved the organized domestic and international importation and distribution of quantities of cocaine and heroin. I have participated in more than ten investigations that involved the use of court-ordered eavesdropping, including being the Affiant for large scale wiretap investigations that occurred in 2008 and 2010. I have testified in the grand jury and in trials on numerous occasions in the United States District Courts.

3. I have written and/or participated in the execution of numerous search warrants resulting in the seizures of large quantities of controlled substances; packing implements and other paraphernalia involved in the manufacture and distribution of controlled substances; large amounts of United States currency, ledger books, bank records, telephone books, receipts, drug customer lists and other documents relating to the manufacturing, transportation, ordering, purchasing and distribution of controlled substances. I have participated in the debriefing of dozens of defendants, informants and witnesses who had personal knowledge regarding large-scale narcotics trafficking organizations. I have participated in all aspects of drug investigations including conducting surveillance, monitoring and overseeing wiretap investigations, executing searches pursuant to court-ordered search warrants and executing arrests. As a result of my assignments, I have developed extensive specialized knowledge in the field of narcotics identification, investigation and enforcement.

4. I have received training in the field of narcotics enforcement and investigations including, but not limited to, training regarding the identification of common street drugs such as cocaine and heroin. Through my training, education, and experience, I have also become familiar with the manner in which illegal drugs are transported, stored, and distributed, and with the methods of payment for such drugs.

5. Based upon my training and experience, I am familiar with the methods of operation employed by narcotics traffickers operating at the local, state, national and international levels, including those involving the distribution, storage and transportation of narcotics and the collection of monies that constitute the proceeds of narcotics trafficking activities. I am aware that drug traffickers commonly use cellular telephones in furtherance of their drug trafficking activities and frequently change cellular telephone numbers and cellular telephones in an effort to thwart law enforcement's use of electronic surveillance. I am also aware that drug traffickers often speak in vague, guarded, or coded language when discussing their illegal business in an effort to further prevent detection, and often use text messages in lieu of phone calls to avoid speaking over the telephone.

6. My extensive narcotics experience has familiarized me with the general characteristics of cocaine and heroin distribution "cells." A distribution cell consists of two or more individuals who work in concert for the sole purpose of the distribution of large amounts of narcotics. Distribution cells are highly organized and disciplined, with a clear chain of command and control. Distribution cells consist of workers, supervisors, and managers. They are extremely surveillance conscious and have a good understanding of methods used by law enforcement agencies to investigate their activities. It has been my experience that distribution cells are often also instructed in how to best thwart law enforcement efforts to obtain Title III interceptions by limiting the use of cellphones to two to three months, using pre-paid non-registered cellphones that they exchange or pool within the group, or cellular phones registered to an alias or business. Distribution cell groups also employ aggressive counter surveillance tactics. Distribution cell groups often network with other distribution cells in order to maintain a constant supply of the distributed drug. Distribution cell groups often maintain

locations other than their primary residences to be used as secure points of distribution or storage of money and/or drugs.

7. I make this affidavit based upon personal knowledge derived from my participation in this investigation since February 2014 and upon information (whether received directly or indirectly) that I believe to be reliable from numerous sources including the following:

- a. My training and experience in investigating narcotics-trafficking and money-laundering crimes;
- b. Oral and written reports, and documents about this investigation and related investigations that I have received from other federal, state, and local law enforcement agents;
- c. Physical surveillance conducted by me and other federal, state, and local law enforcement officers, the results of which have been reported to me directly or indirectly;
- d. Telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- e. Global Positioning System (“GPS”) tracking data;
- f. Statements of confidential sources;
- g. Queries of law enforcement records and intelligence databases; and
- h. The interception of wire and electronic communication.

8. Based upon my training and experience, I am aware that it is a violation of Title 21, United States Code, Section 846 for individuals to conspire to distribute and to distribute heroin. I submit this Affidavit in support of the government’s motion to detain the defendants charged in United States v. Dedwin Cruz-Rivera et al., 15-10302-GAO: Dedwin CRUZ-RIVERA, Eric MATOS, Miguelina Mejia RUIZ a/k/a “Doris Mejia” (“MEJIA”), Manuel ROMERO-GONSALEZ, Maria, Elena OCASIO, Christian SOSTRE, Cory S. NICKERSON,

Oniel RIVERA, Julio C. OCASIO, Xavier RAMOS, Maria RODRIGUEZ, William M. RODRIGUEZ, Lindsay Ann BELISLE, John A. GRAY, Jr., Jose O. PEREZ, Kelly PATTERSON, Jorge VEGA, Jose A. RODRIGUEZ, Christopher PEREZ, Steven M. ENOS, Philip MALAGUTI, Luz GONZALEZ, Francis GONSALEZ-ROMERO, Kelly Jean GAGNON, and Joseph W. PARSONS.

9. Because this affidavit is being submitted for the limited purpose of apprising the Court of facts supporting the government's request for detention, I have not set forth each and every fact learned during the course of this investigation.

OVERVIEW OF INVESTIGATION

10. On September 30, 2015, a federal grand jury sitting in the District of Massachusetts returned a three-count indictment charging the above-named defendants with conspiracy to possess with intent to distribute and to distribute a controlled substance, to wit heroin and fentanyl, in violation of Title 21, United States Code, Section 846, and charging William RODRIGUEZ, MATOS, and MEJIA with substantive drug offenses in violation of Title 21, United States Code, Section 841(a)(1).

11. The indictment is the product of a fifteen-month wiretap investigation targeting heroin distributors operating in and around Taunton, Massachusetts. Beginning in approximately July 2014, DEA agents obtained authorization to intercept communications over a series of cellular telephones used by GRAY (Target Telephone #1), William RODRIGUEZ (Target Telephone #2), CRUZ-RIVERA (Target Telephone #3), Maria RODRIGUEZ (Target Telephone #4), ROMERO-GONSALEZ (Target Telephone #5), and Oniel RIVERA (Target Telephone #6). In addition to wiretaps, the investigation involved the use of physical surveillance, confidential informants, pole camera surveillance, warrants for precise location information for telephones

used by members of the charged conspiracy, seizures of drugs, and execution of search warrants.

12. As set forth in the chart attached as Exhibit A, the investigation revealed that CRUZ-RIVERA was obtaining heroin and fentanyl from drug suppliers including MATOS and ROMERO-GONSALEZ, and was distributing the drugs to Taunton-based customers including Maria RODRIGUEZ and William RODRIGUEZ, RAMOS, and Oniel RIVERA. William RODRIGUEZ, in turn, distributed heroin to customers in Taunton and elsewhere, including GRAY, PARSONS, GAGNON, Jose PEREZ, PATTERSON, VEGA, Jose RODRIGUEZ, Christopher PEREZ, ENOS, and MALAGUTI.

13. During the course of the investigation, agents seized approximately 300 grams of fentanyl from MEJIA (who was delivering the drugs to CRUZ-RIVERA on behalf of MATOS), and thirty-five grams of heroin from various (charged and uncharged) members of the conspiracy.

14. The intercepted communications set forth below are representative examples and do not encompass the entire universe of evidence relating to any defendant.

FACTS SUPPORTING DETENTION

Dedwin CRUZ-RIVERA

15. CRUZ-RIVERA is a heroin supplier based in Fall River, Massachusetts. CRUZ-RIVERA obtains heroin and fentanyl from MATOS and ROMERO-GONSALEZ, among others, that he redistributes to customers in Taunton. During the course of the investigation, agents seized approximately 300 grams of fentanyl that MEJIA was delivering to him on MATOS's behalf. Agents have intercepted CRUZ-RIVERA's telephones off and on since approximately October 2014. During that time, agents intercepted several conversations during which CRUZ-RIVERA inquired about purchasing guns.

On November 24-26, 2014, CRUZ-RIVERA Obtained Heroin from ROMERO-GONSAELZ and Distributed It to Maria RODRIGUEZ and Will RODRIGUEZ.

16. On November 24, 2014, agents intercepted a call during which Maria RODRIGUEZ spoke to Will RODRIGUEZ. During the call, Will RODRIGUEZ stated, “Hey, Mommy, you don’t have any food.” Maria RODRIGUEZ stated, “No.” Will RODRIGUEZ asked, “Can you call him? Let him know I’m pretty sure I’m going to be ready today to eat.” Maria RODRIGUEZ agreed. Later that afternoon, agents intercepted a second call between Maria RODRIGUEZ and Will RODRIGUEZ. During the call, Will RODRIGUEZ stated, “I’m definitely going to be ready today Just let me know when he comes.” Maria RODRIGUEZ agreed. Based on my training and experience, as well as my familiarity with this investigation, I believe that “food” is code for heroin, and that Will RODRIGUEZ asked Maria RODRIGUEZ to obtain heroin for him.

17. Immediately thereafter, Maria RODRIGUEZ sent an intercepted text message to CRUZ-RIVERA that stated, “Willy needs more food for today.” Approximately an hour and a half later, CRUZ-RIVERA responded by intercepted text message, “Okay tell him that if he waits until tomorrow to give him the new stuff.” Shortly thereafter, CRUZ-RIVERA texted Maria RODRIGUEZ again and stated, “Okay I think it will be ready for later.” Based on my training and experience, as well as my familiarity with this investigation, I believe that Maria RODRIGUEZ asked CRUZ-RIVERA for heroin for Will RODRIGUEZ, and that CRUZ-RIVERA agreed to deliver the heroin that evening.

18. One minute later, agents intercepted a call between CRUZ-RIVERA and ROMERO-GONSALEZ. During the call, CRUZ-RIVERA asked ROMERO-GONSALEZ, “Can you pass by real quick by Nana’s?” ROMERO-GONSALEZ agreed and stated that he would be there in five minutes. Based on my training and experience, as well as my familiarity

with this investigation, I believe that CRUZ-RIVERA contacted ROMERO-GONSALEZ to obtain heroin for Maria RODRIGUEZ. Precise location information for Target Telephone #3 shows that at that time, CRUZ-RIVERA was in the area of 92 Laura Street, Providence, which is the residence of Maria Elena OCASIO a/k/a “Nana.”

19. The following day, November 25, 2014, agents intercepted a call between CRUZ-RIVERA and Maria Elena OCASIO. CRUZ-RIVERA asked, “Is there something to eat or no?” OCASIO stated, “Yes, I made some rice, and I’m buying some bacalao.” Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA inquired with OCASIO about whether there was heroin available for pickup at her house.

20. That afternoon, CRUZ-RIVERA sent an intercepted text message to Maria RODRIGUEZ that stated, “Tell Willi that the turkey is ready.” Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA was going to pick up heroin from OCASIO’s residence and contacted Maria RODRIGUEZ to tell her that he had heroin available for her and Will RODRIGUEZ.

21. Approximately fifteen minutes later, agents observed CRUZ-RIVERA and SOTRE travel to OCASIO’s residence in Providence. Agents then observed CRUZ-RIVERA and SOSTRE enter OCASIO’s residence. Precise location information for Target Telephone #3 shows that CRUZ-RIVERA departed OCASIO’s residence later that afternoon and traveled back to his residence in Fall Rivera. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA picked up heroin supplied by ROMERO-GONSALEZ from OCASIO’s residence. Precise location information for Target Telephone #3 shows that that evening, CRUZ-RIVERA went to Maria RODRIGUEZ’s home at 10 Mador Avenue in Taunton. Almost an hour later, agents conducting surveillance observed a car used by

Will RODRIGUEZ arrive at Maria RODRIGUEZ's residence. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA delivered heroin to Maria RODRIGUEZ, and that she then distributed the heroin to Will RODRIGUEZ.

On December 9, 2014, CRUZ-RIVERA Received Heroin from Maria Elena OCASIO and Distributed It to Maria RODRIGUEZ and RAMOS.

22. On December 9, 2014, agents intercepted a voicemail that Maria Elena OCASIO left for CRUZ-RIVERA. During the voicemail, OCASIO stated, "Cua, call me back. There's food, son." Based on my training and experience, as well as my familiarity with this investigation, I believe that OCASIO was alerting CRUZ-RIVERA that she had heroin available for pickup. That afternoon, RAMOS sent an intercepted text message to CRUZ-RIVERA that stated, "I'm in Taunton dad when you're ready hit me up." Later that afternoon, CRUZ-RIVERA texted RAMOS and stated, "Okay dad go I'm at Desire's mothers house." RAMOS agreed.

23. Agents were conducting physical surveillance that day. They observed CRUZ-RIVERA travel to OCASIO's residence in Providence. SOSTRE was a passenger in the car CRUZ-RIVERA was driving. Agents observed CRUZ-RIVERA and SOSTRE arrive at and enter OCASIO's residence. Approximately forty-five minutes later, agents observed CRUZ-RIVERA and SOSTRE leave the residence and depart the area. They then traveled back to CRUZ-RIVERA's residence at 411 Osborn Street, Fall River.

24. Approximately two hours after CRUZ-RIVERA and SOSTRE arrived at CRUZ-RIVERA's residence, CRUZ-RIVERA sent an intercepted text message to RAMOS. The text message stated, "On my way." CRUZ-RIVERA sent a follow-up text message that stated, "I'll be there in 10 be on the look out." One minute later, RAMOS texted CRUZ-RIVERA, "Go to

the back side.” CRUZ-RIVERA and RAMOS then exchanged a series of text messages showing that they were meeting with one another.

25. Also that evening, agents conducting surveillance observed CRUZ-RIVERA travel to Maria RODRIGUEZ’s residence at 10 Mador Avenue, Taunton. Although agents were unable to observe CRUZ-RIVERA enter the residence, approximately twenty minutes after he arrived in the area, CRUZ-RIVERA was seen leaving Maria RODRIGUEZ’s residence. He traveled to 9 Fifth Street in Taunton, where agents observed him meet with RAMOS briefly. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA picked up heroin from OCASIO’s house, took it back to his residence to process it for distribution, and delivered heroin to Maria RODRIGUEZ and RAMOS.

On April 5, 2015, RAMOS Offered to Sell CRUZ-RIVERA a Gun.

26. On April 5, 2015, agents intercepted a series of text messages between CRUZ-RIVERA and RAMOS regarding acquisition of a gun. That day, at approximately 2:06 p.m., RAMOS sent CRUZ-RIVERA a text message that stated, “I have that.” At approximately 2:15 p.m., CRUZ-RIVERA replied, “The 38.” RAMOS texted CRUZ-RIVERA back right away, stating, “Yes dad.” At approximately 5:58 p.m., RAMOS sent CRUZ-RIVERA a text message that stated, “I found a 38 or a 357 for you my buddy is going to call me back to see if he’ll bring it down.” At approximately 5:58 p.m., RAMOS texted CRUZ-RIVERA again, stating, “He’s going to sell them to me.” Over the course of the next several hours, RAMOS sent CRUZ-RIVERA follow-up text messages asking if he had received RAMOS’s earlier messages. No telephone calls were intercepted that day due to the Easter holiday. Based on my training and experience, I believe that when CRUZ-RIVERA and RAMOS referenced a “38” and a “357,” they were referring to handguns that RAMOS was able to acquire for CRUZ-RIVERA.

On April 9-13, 2015, CRUZ-RIVERA and RIVERA Discussed Heroin and Getting a Gun.

27. On April 9, 2015, at approximately 7:49 p.m., agents intercepted a call between CRUZ-RIVERA and Oniel RIVERA during which CRUZ-RIVERA stated, “We are not ready; tomorrow is when we will be ready . . . tomorrow then, alright.” RIVERA agreed and then stated, “Nuni was telling me that you need one of those.” CRUZ-RIVERA replied, “Yes, buddy; a 38.” RIVERA stated “on Monday I have a partner of mine coming from there, from Florida . . . and he is going to bring a couple.” CRUZ-RIVERA then stated, “Get me one.” Based on my training and experience, as well as my familiarity with this investigation, I believe that Oniel RIVERA wanted an additional quantity of heroin from CRUZ-RIVERA and that CRUZ-RIVERA initially indicated that he would not have heroin available until the following day. I further believe that CRUZ-RIVERA stated that he wanted to acquire a gun. I believe that “Nuni,” or RAMOS, had told RIVERA that CRUZ-RIVERA wanted a gun, and that RIVERA had a criminal associate who was going to bring guns to Massachusetts from Florida.

28. On April 13, 2015, at approximately 3:42 p.m., agents intercepted a call between CRUZ-RIVERA and RIVERA. During the call, RIVERA stated, “I got you one, one that . . . doesn’t throw shells. . . . For eight.” CRUZ-RIVERA asked, “Do you have it already?” and RIVERA affirmed. CRUZ-RIVERA then stated, “Give me some time.” At approximately 4:26 p.m., CRUZ-RIVERA spoke to RIVERA again. RIVERA stated, “I got you the little ones as well because it fits six It’s going to be full.” CRUZ-RIVERA stated, “I’ll call you when I get there.” Based on my training and experience, I believe that this conversation concerned a gun; that RIVERA had received a gun from his unknown criminal associate and that RIVERA was prepared to deliver the gun to CRUZ-RIVERA.

On April 22-24, 2015, CRUZ-RIVERA and RIVERA Discussed the Exchange of a Firearm

29. On April 22, 2015, agents intercepted a call between CRUZ-RIVERA and Oniel RIVERA. During the call, RIVERA stated, "I was going to tell you that my partner is bringing me like the one I gave you." CRUZ-RIVERA stated, "Another 38," and RIVERA said, "Yes." CRUZ-RIVERA said, "Let me talk to my brother to see if he wants it, and I'll call you later." Based on my training and experience, I believe that RIVERA had a "38," which was reference to a gun, available for sale; that the statement "like the one I gave you" was a reference to the fact that RIVERA had distributed a .38 gun to CRUZ-RIVERA previously; and that CRUZ-RIVERA was going to check with his brother to see whether he needed the gun.

30. On April 24, 2015, agents intercepted another call between CRUZ-RIVERA and Oniel RIVERA. During the call, RIVERA stated, "The kid brought me one of the nine ones." CRUZ-RIVERA stated, "I already have a nine, you know. I wanted was a 38, and since I bought you that one, you know." CRUZ-RIVERA stated, "My little brother thought you wanted a 38, and he told me he already got it over there in Providence." Based on my training and experience, I believe that RIVERA had a 9 millimeter gun available to sell to CRUZ-RIVERA, and that CRUZ-RIVERA already had a 9 millimeter gun and wanted a "38", which is a different type of gun, from RIVERA.

31. CRUZ-RIVERA's criminal history includes a February 2015, felony conviction for money laundering greater than \$1,500 less than \$20,000. I believe, based on intercepted calls, that Dedwin CRUZ-RIVERA is a false identity.

Eric MATOS

32. MATOS is a fentanyl supplier based in Lawrence, Massachusetts. MATOS was intercepted agreeing to supply CRUZ-RIVERA with fentanyl, and agents seized approximately

300 grams of fentanyl from MEJIA, who was delivering the drugs to CRUZ-RIVERA on behalf of MATOS. MATOS is currently in state custody on drug charges related to the execution of a search warrant at his residence in July 2015.

On July 6, 2015, Agents Seized 300 Grams of Fentanyl that MEJIA Was Delivering to CRUZ-RIVERA on behalf of MATOS.

33. On July 4, 2015, CRUZ-RIVERA sent an intercepted text message to MATOS that stated, "Start preparing the good cheese." They then agreed to meet that day, and MATOS texted, "I'm going to send 3." Ultimately, the transaction was delayed for two days. On July 6, 2015, MATOS and CRUZ-RIVERA sent text messages to one another about the timing of the delivery. Agents were conducting surveillance that day. Agents observed MEJIA, who is MATOS's paramour, leave her and MATOS's residence, but lost surveillance of her in Lawrence. Agents located MEJIA on Route 24 southbound and conducted a motor vehicle stop of MEJIA's car. After receiving Miranda warnings in English, MEJIA told police that she had been sent by a friend to pick up money. After a drug trained canine alerted to the car, the car was towed. MEJIA was not arrested. Agents recovered 300 grams of fentanyl from the trunk of the car.

34. When MEJIA was delayed arriving at CRUZ-RIVERA's residence, CRUZ-RIVERA directed SOSTRE to drive around the area to see if she had been stopped by police. SOSTRE did so and reported that he had not seen her. Thereafter, MATOS called CRUZ-RIVERA and in an intercepted call reported that MEJIA had been stopped by police, and the car had been towed with the drugs inside. MATOS recommended that CRUZ-RIVERA "disappear from there," and CRUZ-RIVERA responded that he had already left the area.

35. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA contacted MATOS to request delivery of what he

believed was heroin. I further believe that MATOS told CRUZ-RIVERA that he was sending 300 grams of drugs. I believe that MEJIA then transported 300 grams of fentanyl intended for CRUZ-RIVERA at MATOS's behest. I believe that after MEJIA was stopped, MATOS informed CRUZ-RIVERA that the car had been seized by police and recommended that CRUZ-RIVERA leave the area to avoid police detection.

36. MATOS has a criminal history that includes a July 2015 arrest on state drug trafficking charges. That case remains open. MATOS also has criminal histories under the names Julio Vilches and Elizer Rodriguez that include the following: active warrants for refusal to provide a DNA sample and cocaine trafficking, among other charges, a 2006 conviction for possession to distribute heroin and cocaine and possession with intent to distribute within a school zone, a 2004 conviction for possession of heroin, and a 2004 continuance without a finding on possession with intent to distribute a class A substance. MATOS was deported on February 17, 2011.

Miguelina Mejia RUIZ a/k/a Doris MEJIA

37. MEJIA assists her paramour, MATOS, with his drug distribution by acting as a drug and money courier. As set forth in paragraphs 33-35 above, on July 6, 2015, agents seized 300 grams of fentanyl that MEJIA was delivering to CRUZ-RIVERA on behalf of MATOS.

38. MEJIA has no prior criminal convictions.

Manuel ROMERO-GONSALEZ

39. ROMERO-GONSALEZ is a heroin supplier based in Providence, Rhode Island. Intercepted communications demonstrate that ROMERO-GONSALEZ supplied CRUZ-RIVERA and NICKERSON with heroin. Luz GONZALEZ and Francis GONSALEZ-ROMERO assisted ROMERO-GONSALEZ with his drug distribution activities.

40. As set forth in paragraphs 18-21 above, ROMERO-GONSALEZ was intercepted agreeing to distribute heroin to CRUZ-RIVERA on November 24-26, 2014. Additional examples of ROMERO-GONSALEZ's drug distribution activities are set forth below.

On November 14, 2014, ROMERO-GONSALEZ Distributed a Kilogram of Heroin to CRUZ-RIVERA via SOSTRE.

41. On November 13, 2014, agents intercepted a call to CRUZ-RIVERA during which an unidentified customer stated that he would be "ready" for later. CRUZ-RIVERA stated that he would call "the guy" and immediately placed a call to ROMERO-GONSALEZ, which was not completed. Later that day, CRUZ-RIVERA spoke to ROMERO-GONSALEZ in an intercepted call during which CRUZ-RIVERA stated that he had "some money" for ROMERO-GONSALEZ and asked, "Can you get 100 pesos real quick around there for me, even if I give you the money in cash?" CRUZ-RIVERA stated that he could pick "that" up right away and planned to "add a little bit to mine" to he could "sell[] it to someone like that." ROMERO-GONSALEZ stated that he would "call the guy right now." ROMERO-GONSALEZ then stated that he would have "that" for CRUZ-RIVERA, and CRUZ-RIVERA could "take it." CRUZ-RIVERA replied, "Oh, then yeah, get that whole thing for me instead then. Because I am going to give you almost, anyway, I still have there. I already gave you twenty, right?" ROMERO-GONSALEZ agreed, and CRUZ-RIVERA stated, "Alright then, go ahead. Get that for me as a whole, but as soon as possible." In a subsequent intercepted call, CRUZ-RIVERA and ROMERO-GONSALEZ agreed to do the transaction the following day.

42. On November 14, 2014, agents intercepted calls between CRUZ-RIVERA and his unidentified drug customer during which CRUZ-RIVERA related that he was in Providence and "waiting for the guy." Based on my training and experience, as well as my familiarity with this investigation, I believe CRUZ-RIVERA was at Maria Elena OCASIO's house. CRUZ-RIVERA

and ROMERO-GONSALEZ originally planned to do the transaction at 11:00 a.m., but ROMERO-GONSALEZ was delayed, and CRUZ-RIVERA eventually left. CRUZ-RIVERA then sent SOSTRE to retrieve the drugs from Maria Elena OCASIO's house. SOSTRE notified CRUZ-RIVERA, in an intercepted call, when he arrived at OCASIO's house. He stated that ROMERO-GONSALEZ had not yet arrived. Shortly after 6:00 p.m., CRUZ-RIVERA received an intercepted text message from SOSTRE that stated that SOSTRE was "on [his] way." SOSTRE updated CRUZ-RIVERA on his whereabouts as he traveled back to Fall River, and CRUZ-RIVERA called his heroin customer and arranged to meet with him based on SOSTRE's estimated arrival time. Based on intercepted calls, CRUZ-RIVERA ultimately met with the customer that evening.

43. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA's customer called him to let him know he was ready to buy more heroin, and that CRUZ-RIVERA then called ROMERO-GONSALEZ and requested 100 grams of heroin. I believe that when ROMERO-GONSALEZ stated that he would have a kilogram for CRUZ-RIVERA, CRUZ-RIVERA stated that he would take it. I believe that CRUZ-RIVERA traveled to Providence to meet with ROMERO-GONSALEZ, but after delays, SOSTRE picked up the heroin from ROMERO-GONSALEZ at Maria Elena OCASIO's house and transported it back to Fall River. I believe that CRUZ-RIVERA then distributed some of the heroin he received from ROMERO-GONSALEZ to his unidentified customer.

On February 20, 2015, ROMERO-GONSALEZ Distributed Thirty Grams of Heroin to NICKERSON with Luz GONZALEZ's Assistance.

44. On February 13, 2015, agents intercepted a call between ROMERO-GONSALEZ and NICKERSON during which NICKERSON, who does not speak Spanish, stated that he needed "something different." NICKERSON went on to say, "Everybody Cape Cod clients and

New Bedford clients, no happy, not good, man. Blah blah blah blah. Garbage, garbage, garbage.” ROMERO-GONSALEZ stated that he would call NICKERSON right back.

45. Immediately thereafter, ROMERO-GONSALEZ called Luz GONZALEZ and asked her to call NICKERSON. Pen register data for Luz GONZALEZ’s telephone shows that she then called NICKERSON and spoke with him for approximately fifteen minutes. Shortly thereafter, Luz GONZALEZ called ROMERO-GONSALEZ, and during an intercepted call, she told ROMERO-GONSALEZ that she had spoken with “him,” and that “he” had reported that “the stuff was better from what you gave him before,” but that it still was not “as strong as the other, like from a month ago.” Luz GONZALEZ further related that NICKERSON had asked why ROMERO-GONSALEZ did not “get it from the same person,” and Luz GONZALEZ and ROMERO-GONSALEZ then agreed that it was “the same.” Luz GONZALEZ then told ROMERO-GONSALEZ that although customers were saying that “the stuff” was garbage, NICKERSON was going to “finish it,” even if it took a little longer. Luz GONZALEZ and ROMERO-GONSALEZ then discussed giving NICKERSON “something better,” but ROMERO-GONSALEZ ultimately decided that he would wait for NICKERSON to “square away” before giving him anything else.

46. A few days later, on February 17, 2015, agents intercepted a call between NICKERSON and ROMERO-GONSALEZ during which NICKERSON stated the he would be ready the next day and would have “extra” money, perhaps \$3,000. ROMERO-GONSALEZ and NICKERSON ultimately arranged to meet the following day, and NICKERSON requested “six zero, not five zero, six zero.”

47. The transaction between NICKERSON and ROMERO-GONSALEZ was eventually pushed off for two days. On February 20, 2015, NICKERSON and ROMERO-

GONSALEZ again discussed quantities, with NICKERSON stating that he needed no less than “forty,” but that “fifty” or “sixty” would be okay. NICKERSON told ROMERO-GONSALEZ that he would be at ROMERO-GONSALEZ’s house at approximately 1:22 p.m. At approximately 1:16 p.m., ROMERO-GONSALEZ called Maria Elena OCASIO and told her that he was going to her house. Ten minutes later, ROMERO-GONSALEZ told NICKERSON that he would be ready in five minutes. Based on subsequent calls, NICKERSON and ROMERO-GONSALEZ met that afternoon.

48. Later that day, NICKERSON called ROMERO-GONSALEZ and told him, in an intercepted call, that he was “[f]inish. All set.” He further stated that he had “the money” and specified that he had “1,400” for “the thirty.” NICKERSON also requested “thirty” more from ROMERO-GONSALEZ. Three days later, on February 23, 2015, Luz GONZALEZ spoke to NICKERSON in an intercepted call and asked, “How much did he give you?” NICKERSON replied, “I had to get rid of thirty.” GONZALEZ then asked, “Alright, so do you have the money? The last forty? He needs the money for the last thirty. That’s all he’s asking.” NICKERSON replied that he had “it” and needed to find a ride.

49. Based on my training and experience, as well as my familiarity with this investigation, I believe that on February 13, 2015, NICKERSON called ROMERO-GONSALEZ to complain about the quality of the heroin that ROMERO-GONSALEZ had previously distributed to him. I believe that Luz GONZALEZ called NICKERSON to act as an interpreter between NICKERSON, who does not speak Spanish, and ROMERO-GONSALEZ, who does not speak English. I believe that NICKERSON requested that ROMERO-GONSALEZ sell him sixty grams of heroin. I believe that ROMERO-GONSALEZ met with NICKERSON on February 20, 2015, and delivered thirty grams of heroin to him. I further believe that

NICKERSON distributed the heroin that day and called to tell ROMERO-GONSALEZ that he had drug proceeds for him and needed more heroin. I believe that when NICKERSON requested more heroin from Luz GONZALEZ three days later, Luz GONZALEZ stated that NICKERSON would have to pay for the heroin he had already received before receiving any more.

50. ROMERO-GONSALEZ has no prior criminal convictions. He has an open case in which he is charged with giving a false document to an official, obstructing an officer in execution of duty, and driving without a license.

Maria Elena OCASIO

51. Maria Elena OCASIO is a heroin customer of ROMERO-GONSALEZ who redistributes the heroin she purchases. She also acts as a broker for CRUZ-RIVERA and, as set forth below, was intercepted introducing him to a new heroin supplier. CRUZ-RIVERA frequently was intercepted and observed taking delivery of heroin from ROMERO-GONSALEZ at OCASIO's residence at 92 Laura Street, Providence, Rhode Island. On October 1, 2015, agents seized a small amount of a substance believed to be narcotics from OCASIO's handbag at her residence.

On March 1, 2015, ROMERO-GONSALEZ Distributed Five Grams of Heroin to Maria Elena OCASIO.

52. On February 26, 2015, agents intercepted a call between ROMERO-GONSALEZ and Maria Elena OCASIO during which OCASIO asked, "Do you remember the candy, the one you made the other day, the brown ones?" ROMERO-GONSALEZ affirmed, and OCASIO stated, "Get me at least four so I can sell it for both of us." ROMERO-GONSALEZ stated that "it" would have to be for the following day, and OCASIO stated that she would call "the guy" to "let him know."

53. On March 1, 2015, agents intercepted a call between ROMERO-GONSALEZ and

OCASIO during which OCASIO stated, "You and I agreed upon a small thing the other day. I was going to do it today, but look how the weather is." ROMERO-GONSALEZ said to call him the following day, and OSASIO stated, "I'll secure it to see if I sell it for both of us." Later that evening, OCASIO called ROMERO-GONSALEZ, and during an intercepted call stated, "I just got a customer looking for ten grams, five or ten grams, cash. [He] was telling me that the one I gave him of yours last time, he added a little bit, one by one, and it turned up good." OCASIO then asked, "You think we can tell him we can add one by one?" ROMERO-GONSALEZ stated that he could "get it," and OCASIO asked, "How much?" ROMERO-GONSALEZ then stated, "I can give it to you for fifty, Nana, and you can sell it to him for whatever you want."

54. Shortly thereafter, on March 1, 2015, OCASIO told ROMERO-GONSALEZ in an intercepted call, "Get me five little curtains of the ones, you know, and also the thing I ordered because I am on my way with the money." ROMERO-GONSALEZ asked for clarification, and OCASIO stated, "Five and five, one by one, like you said." ROMERO-GONSALEZ then asked if OCASIO wanted it "separate" or she wanted him to "add it." OCASIO stated, "Put it separate so that he can try it with one."

55. Based on my training and experience, I believe that OCASIO initially contacted ROMERO-GONSALEZ to request four grams of heroin that she planned to redistribute to a customer. I believe that when that transaction was delayed, OCASIO called ROMERO-GONSALEZ again and stated that she had a customer looking for five grams of heroin. I believe that OCASIO stated that the customer previously had received heroin distributed by ROMERO-GONSALEZ and had been happy with the quality because he had been able to add adulterants to the heroin at a ratio of 1:1. I believe that OCASIO then told ROMERO-GONSALEZ that she was traveling to his location to retrieve five grams of heroin and five grams of cutting agent, and

that she did not want ROMERO-GONSALEZ to mix the cutting agent with the heroin, but rather wanted him to leave the two substances separate so that the customer could mix it himself.

On March 4, 2015, Maria Elena OCASIO Wanted Additional Heroin from ROMERO-GONSALEZ.

56. On March 4, 2015, at approximately 12:57 p.m., agents intercepted a call during which ROMERO-GONSALEZ spoke with Maria Elena OCASIO. During the call, OCASIO stated, "Prepare me a little thing a five with a five." ROMERO-GONSALEZ stated, "Give me an hour." Based on my training and experience, as well as my familiarity with this investigation, I believe that Maria Elena OCASIO wanted to purchase five grams of heroin mixed with five grams of cutting agent from ROMERO-GONSALEZ.

57. Later that day, at approximately 6:26 p.m., agents intercepted another call between ROMERO-GONSALEZ and OCASIO. During the call, OCASIO stated, "Do you remember I told you I wanted some little thing for today . . . out of those five, you are going to put two on the side without adding anything to it. And add three to the three. It's at 50. Leave me two pure ones because it's for me to sell them pure." Based on my training and experience, as well as my familiarity with this investigation, I believe that OCASIO revised her order and wanted to receive three grams of heroin mixed with three grams of cutting agent, and two grams of heroin pure, or without cutting agent. I believe that OCASIO was going to pay \$50 a gram for the heroin.

58. Approximately twenty minutes later, ROMERO-GONSALEZ spoke to OCASIO again. During the call, ROMERO-GONSALEZ stated, "I will be there in about 20 minutes, Nana. I will call you as soon as I get there." OCASIO stated, "Put one gram of 'curtain' on the side, just one gram. Call me when you arrive." Based on my training and experience, I believe that ROMERO-GONSALEZ was going to deliver the heroin to OCASIO.

On April 11, 2015, Maria Elena OCASIO Provided CRUZ-RIVERA with Heroin from an Alternate Heroin Supplier.

59. On April 11, 2015, agents intercepted a call between CRUZ-RIVERA and Maria Elena OCASIO during which CRUZ-RIVERA asked OCASIO to “hit up Vianna” because he was having difficulty reaching her. OCASIO stated that she had been calling “Vianna” and then stated, “I’m going to tell you something. There’s another person around that knows a lot about that stuff and works well.” Later that evening, CRUZ-RIVERA spoke to OCASIO again. During the call, OCASIO stated, “What we talked about earlier, the girl has it already. I got it already. So whenever you want it, in the morning or if you want to come get it today, or if you want me to bring it to you.” Based on my training and experience, as well as my familiarity with this investigation, I believe that during these calls, CRUZ-RIVERA asked OCASIO to contact “Vianna,” and that OCASIO stated that she knew of an alternate heroin supplier. I believe that OCASIO then told CRUZ-RIVERA that evening that she had received heroin from the alternate supplier and could deliver it to CRUZ-RIVERA. Precise location information for Target Telephone #3 shows that CRUZ-RIVERA traveled to the area of OCASIO’s residence at 9:50 that evening. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA was picking up a heroin sample from OCASIO.

60. Two days later, on April 13, 2015, CRUZ-RIVERA spoke to Maria RODRIGUEZ. Maria RODRIGUEZ stated, “He says that it’s fine that nobody said anything to him, and that they called him for more right now.” CRUZ-RIVERA stated, “Let me call the girl to see if they can get something ahead of that.” A few minutes later, CRUZ-RIVERA called OCASIO and asked, “What price is that girl giving you for that?” OCASIO replied, “Sixty.” Based on my training and experience, as well as my familiarity with this investigation, I believe that Maria RODRIGUEZ told CRUZ-RIVERA that she had distributed the heroin he had

supplied to her, and that the quality of the heroin had been fine. I believe that Maria RODRIGUEZ inquired about getting more of the heroin, and CRUZ-RIVERA called OCASIO to find out the price of the heroin she had obtained for him. I believe that she stated that the heroin was \$60 per gram.

61. That evening, agents intercepted a call between CRUZ-RIVERA and OCASIO during which OCASIO stated, "I'm here at the woman's house. I'm going to talk to her." Shortly thereafter, agents intercepted a call during which CRUZ-RIVERA spoke to an unidentified female (the "UF"). During the call, the UF stated, "The rice takes three, it's at 72. At 72, and it takes three. A jar of beans, and you can add three of the rice." CRUZ-RIVERA stated, "It's too high, because what I was getting they're giving it to me at 60 . . . at 70, but it takes almost five." Based on my training and experience I believe that OCASIO put CRUZ-RIVERA in contact with the unidentified heroin supplier, and that the heroin supplier told CRUZ-RIVERA that the heroin cost \$72 per gram and could be diluted with adulterants at a ratio of 3:1. I believe that CRUZ-RIVERA stated that the price was too high because he was purchasing heroin that could be diluted at a ratio of 5:1 for \$70 per gram.

62. Maria Elena OCASIO has no known prior criminal history.

Christian SOSTRE

63. SOSTRE works as a courier for CRUZ-RIVERA. As set forth in paragraphs 41-43 above, on November 14, 2014, he retrieved heroin from ROMERO-GONSALEZ on CRUZ-RIVERA's behalf. On October 1, 2015, agents seized a .25 Colt revolver and ammunition from SOSTRE's residence. SOSTRE told agents that he had found the gun on the street.

On June 29-30, 2015, Doris MEJIA Delivered Drugs to SOSTRE and Collected Narcotics Proceeds from Him.

64. On June 29, 2015, agents intercepted a text message from CRUZ-RIVERA to

MATOS that stated, "Send someone to get what's missing, I was waiting on my friend and he got killed last night. send tomorrow and 3 or 4 days you send me that." MATOS replied by text message, "I will send some tomorrow also." Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA had drug proceeds ready for MATOS, and that MATOS was going to send a courier to collect the money and deliver additional drugs the following day.

65. On June 30, 2015, agents intercepted a text message from MATOS to CRUZ-RIVERA that stated, "Leaving now. See you in a while." MATOS then clarified by text message, "Between 3 and 4." Shortly thereafter, CRUZ-RIVERA sent an intercepted text message to SOSTRE that stated, "If the people arrive at 4 bring that thing to viki". SOSTRE replied by text message, "Okay, and where are theirs?" CRUZ-RIVERA texted SOSTRE, "They are in the game machine in two packages in plastic." Based on my training and experience, I believe that MATOS told CRUZ-RIVERA that he would arrive to collect the drug proceeds between 3:00 and 4:00, and that CRUZ-RIVERA instructed SOSTRE to give the drug proceeds, which were hidden in a video game machine, to MATOS.

66. That afternoon, at approximately 4:44 p.m., CRUZ-RIVERA received an incoming call from SOSTRE. During the call, SOSTRE put MEJIA on the telephone. MEJIA stated, "You didn't wait for me, you don't want to see me." CRUZ-RIVERA stated that he was working, and MEJIA said, "I was telling him that I bought some kids tennis shoes . . . but they are a size three and it bothers me in the front, I only wore them once." MEJIA stated, "I told him to give me 80 pesos, they are worth 100 and something, like 140, 150, something like that." CRUZ-RIVERA stated, "Tell Christian if he has it there to give it to you." MEJIA repeated, "They are size three, you heard? I will leave the tennis shoes with him." Based on my training

and experience, as well as my familiarity with this investigation, I believe that MATOS sent MEJIA to collect narcotics proceeds from SOSTRE; that MEJIA delivered additional drugs to SOSTRE; and that MEJIA wanted SOSTRE to pay her “80 pesos” for the drugs.

67. Agents were conducting surveillance that day. At approximately 4:20 p.m., agents observed SOSTRE arrive at CRUZ-RIVERA’s residence at 411 Osborn Street in Fall River, Massachusetts. Moments later, agents observed a car driven by MEJIA arrive at the residence and park behind SOSTRE’s car. MEJIA and SOSTRE entered the residence. At approximately 4:30 p.m., MEJIA and SOSTRE exited the residence. SOSTRE was then observed to be looking inside the trunk of the car driven by MEJIA. At approximately 4:40 p.m., SOSTRE was seen speaking on the telephone, handing the telephone to MEJIA, and then MEJIA was seen speaking on the telephone. Agents then observed MEJIA and SOSTRE return to their respective vehicles, get inside, and leave the area. I believe that SOSTRE met with MEJIA in CRUZ-RIVERA’s residence to remit drug proceeds and receive drugs on his behalf.

68. SOSTRE has no known criminal history.

Cory S. NICKERSON

69. NICKERSON is a heroin redistributor based in New Bedford, Massachusetts. He purchases heroin from ROMERO-GONSALEZ. As set forth in paragraphs 44-49 above, on November 14, 2014, NICKERSON obtained thirty grams of heroin from ROMERO-GONSALEZ.

70. NICKERSON’s criminal history includes a January 2015 arrest for possession of Class A heroin and Class B Soboxin, which is pending; a September 2013 conviction for possession to distribute heroin; a July 2012 conviction for distribution of Class B narcotics; a July 2012 conviction for possession to distribute Class A narcotics; a January 2010 conviction

for assault and battery and intimidation; and a December 2008 conviction for assault and battery, among varied other arrests and convictions.

Oniel RIVERA

71. Oniel RIVERA is a heroin redistributor based in Taunton, Massachusetts, who purchases heroin from CRUZ-RIVERA and distributes heroin to Julio OCASIO and John GRAY. As set forth at paragraphs 29-30 above, on April 22, 2015, RIVERA was intercepted discussing obtaining firearms for CRUZ-RIVERA.

On April 22, 2015, Oniel RIVERA Purchased Heroin from CRUZ-RIVERA.

72. On April 22, 2015, agents intercepted a call between CRUZ-RIVERA and Oniel RIVERA during which CRUZ-RIVERA stated, "I brought with me . . . brought that down in case you are ready, so . . . call me when everything is ready." Later that day, agents intercepted a subsequent call in which Oniel RIVERA stated, "I'm done with that stuff." CRUZ-RIVERA stated, "I'll hit you up in like twenty-five or thirty minutes." Later that evening, Oniel RIVERA stated, "I'm home already," and CRUZ-RIVERA stated, "I'm already pulling in . . . start coming down if you want." Approximately fifteen minutes later, precise location information for Target Telephone #3 revealed that CRUZ-RIVERA was in the vicinity of Oniel RIVERA's residence at 39 Hart Street in Taunton. Based on my training and experience, as well as my familiarity with this investigation, I believe that CRUZ-RIVERA was delivering heroin to Oniel RIVERA.

On June 24, 2015, Oniel RIVERA Distributed Heroin to Xavier RAMOS.

73. On June 24, 2015, agents intercepted a call between RIVERA and Xavier RAMOS during which RAMOS asked, "Do you have any food?" RIVERA affirmed, and RAMOS asked, "How much for five?" RIVERA replied, "275." RAMOS then stated, "Let me see, because I have a play, and I'm going to see if they want to pay that." RAMOS then asked,

“If not, what would you give for 225? In cash.” RIVERA replied that he would “give . . . the complete five” but asked that RAMOS try to gather an additional twenty-five to make it 250. RAMOS and RIVERA then made arrangements to meet that night, and RAMOS provided his location. Subsequent interceptions demonstrate that RAMOS and RIVERA met that evening.

74. Based on my training and experience, as well as my familiarity with this investigation, I believe that RAMOS contacted RIVERA to ask whether RIVERA had heroin available. I believe that when RIVERA affirmed, RAMOS asked how much five grams of heroin cost. I believe that RIVERA told RAMOS the price was \$275, and RAMOS stated that he would check with his customer to see if he wanted to pay that price. I believe that RIVERA then inquired about how much heroin he could get for \$225, and that RIVERA stated he would sell the five grams for \$250. I believe that RIVERA delivered the five grams of heroin to RAMOS that evening.

75. Oniel RIVERA’s criminal history includes a June 2007 conviction for assault and battery; an April 2007 conviction for malicious destruction of property and violation of abuse prevention act; an April 2007 conviction for distribution of Class A narcotics; an October 2006 conviction for carrying a dangerous weapon and interfering with a police officer; and an October 2004 conviction for distribution of Class B.

Julio C. OCASIO

76. Julio OCASIO is a heroin redistributor based in Taunton, Massachusetts, who obtains heroin from Oniel RIVERA and distributes heroin to John GRAY.

77. As set forth in paragraphs 105-09 below, OCASIO distributed heroin to John GRAY on July 11, 2014, and July 14, 2014.

78. Julio OCASIO’s criminal history includes an August 2015 charge for unarmed

robbery, assault and battery, larceny by false pretenses, and fraud. The charges are pending.

Xavier RAMOS

79. RAMOS is a heroin redistributor based in Taunton, Massachusetts. He obtains drugs from CRUZ-RIVERA. As set forth at paragraph 22-25, on December 9, 2014, RAMOS obtained heroin from CRUZ-RIVERA. As set forth in paragraphs 73-74, on June 24, 2015, RAMOS obtained heroin from Oniel RIVERA. Also as set forth at paragraph 26 above, on April 5, 2015, RAMOS was intercepted offering to procure a handgun for CRUZ-RIVERA.

On July 3, 2015, RAMOS Wanted Twenty Grams of Heroin to Re-Distribute.

80. On July 3, 2015, RAMOS sent an intercepted text message to CRUZ-RIVERA that stated, "Buddy do you have 20 pesos because I have a move." Later that evening, RAMOS texted CRUZ-RIVERA again and stated, "The girl that wants the 20 pesos is with me buddy." A few minutes later, CRUZ-RIVERA replied, "No I'm with the kids." Based on my training and experience, as well as my familiarity with this investigation, I believe that RAMOS wanted to purchase twenty grams of heroin to distribute to an unknown woman, but that CRUZ-RIVERA was unable to deliver the heroin at that time.

81. RAMOS' criminal history includes the following: a February 2015 felony conviction for money laundering greater than \$1,500 less than \$20,000; a June 2013 arrest for possession to distribute Class A narcotics, conspiracy to violate the controlled substances act, controlled substance in a school zone, and possession to distribute Class A narcotics, which are pending; a January 2013 conviction for knowingly being present with a Class A substance; and an October 2012 conviction for possession of Class B narcotics.

Maria RODRIGUEZ

82. Maria RODRIGUEZ is a heroin distributor based in Taunton. She obtains heroin

from CRUZ-RIVERA and redistributes it to her son, Will RODRIGUEZ, and others, including RAMOS. Maria RODRIGUEZ supplied thirty grams of heroin that was seized during the course of the investigation. She served as the liaison between Will RODRIGUEZ and CRUZ-RIVERA. Generally, Will RODRIGUEZ would contact Maria RODRIGUEZ when he needed heroin. After receiving a request from Will RODRIGUEZ, Maria RODRIGUEZ contacted CRUZ-RIVERA and asked him to provide heroin (usually referred to as “food”). CRUZ-RIVERA would then deliver the heroin to Maria RODRIGUEZ’s residence, and Maria would distribute the heroin to Will. Will RODRIGUEZ rarely contacted CRUZ-RIVERA himself, and when he did, it was usually only to remit drug proceeds.

83. As set forth in paragraphs 16-25, above, on November 24-26, 2014, and December 9, 2014, Maria RODRIGUEZ obtained heroin from CRUZ-RIVERA that she redistributed to Will RODRIGUEZ.

On October 24, 2014, Maria RODRIGUEZ Obtained Heroin from CRUZ-RIVERA and Distributed It to Will RODRIGUEZ.

84. On October 24, 2014, agents intercepted a call between Will RODRIGUEZ and Maria RODRIGUEZ during which Will asked, “Can you tell him that I’ll be ready in a little bit?” Later that day, during another intercepted call, Will told Maria, “The last food I had, like everybody was liking it. So if you can um, season it the same way, that would be good.” Minutes later, Maria sent an intercepted text message to CRUZ-RIVERA that stated, “Hey Willy says he’s hungry what time will the food be ready.” CRUZ-RIVERA replied by text message, “I’ll be there in one hour.” Later that afternoon, agents intercepted a text message from CRUZ-RIVERA to Maria that stated, “Call willi I am here.” Approximately half an hour later, Maria called Will and told him, in an intercepted call, “He’s over there.”

85. Based on my training and experience, as well as my familiarity with this

investigation, I believe that Will called Maria to tell her that he wanted to obtain more heroin, and that his customers had liked the quality of the heroin he had previously obtained. I believe that Will asked Maria to get the same type of heroin she had received previously. I further believe that Maria then contacted CRUZ-RIVERA to request additional heroin, and that CRUZ-RIVERA stated that he would deliver the heroin in an hour. I also believe that CRUZ-RIVERA called Maria to notify her when he had arrived, and that Maria informed Will that CRUZ-RIVERA was at her house with the heroin.

On October 24, 2014, Maria RODRIGUEZ Distributed Ten Grams of Heroin to Xavier RAMOS.

86. While CRUZ-RIVERA was at Maria RODRIGUEZ's house on October 24, 2014, agents intercepted a text message from Xavier RAMOS to CRUZ-RIVERA that stated, "Are you around daddy I need 10 peso for my friend." Later that evening, agents intercepted a call between CRUZ-RIVERA and Maria RODRIGUEZ during which CRUZ-RIVERA asked, "Do you have ten pesos for Nuni there?" RODRIGUEZ affirmed, and CRUZ-RIVERA stated, "I am going to call him now. He said he'll be there in ten minutes." Immediately thereafter, CRUZ-RIVERA sent an intercepted text message to RAMOS that stated, "Take the money and pass by and go on bicycle or foot. No car. You know she is going to sell it to you from hers." RAMOS agreed.

87. Agents were conducting surveillance that evening. Approximately twenty minutes after CRUZ-RIVERA spoke with RODRIGUEZ, agents observed a person, who they could not identify, arrive at Maria RODRIGUEZ's house on a bicycle.

88. Based on my training and experience, as well as my familiarity with this investigation, I believe that after leaving RODRIGUEZ's home, CRUZ-RIVERA saw the text message from RAMOS requesting ten grams of heroin for a "friend." I believe that CRUZ-

RIVERA then contacted Maria RODRIGUEZ and asked whether she could distribute ten grams of heroin to RAMOS. I believe that RODRIGUEZ agreed, and that RAMOS or his associate rode a bike to RODRIGUEZ's house, as instructed by CRUZ-RIVERA, to retrieve the heroin.

On December 8, 2014, Maria RODRIGUEZ Delivered Heroin to William RODRIGUEZ.

89. On December 8, 2014, agents intercepted a call between Maria RODRIGUEZ and William RODRIGUEZ. During the call, William RODRIGUEZ stated, "I'm at home now." William RODRIGUEZ asked, "You got that on you?" Maria RODRIGUEZ asked, "You want me to bring it to you, or you want me to leave it here?" William RODRIGUEZ stated, "Bring it to me." Maria RODRIGUEZ stated, "I'm going to bring it." Based on my training and experience, as well as my familiarity with this investigation, I believe that Maria RODRIGUEZ was going to deliver heroin to William RODRIGUEZ at his residence, which is located at 59 Oak Street # 2 in Taunton, Massachusetts.

90. Agents were conducting surveillance that afternoon. At approximately 3:15 p.m., agents observed that a vehicle known to be used by William RODRIGUEZ was in the driveway of 59 Oak Street. At approximately 3:27 p.m., a vehicle, known to be driven by Maria RODRIGUEZ arrived in the driveway at 59 Oak Street and parked behind the William RODRIGUEZ vehicle. Maria RODRIGUEZ was observed exiting her vehicle and entering the side door from the driveway of 59 Oak Street. Based on my training and experience, as well as my familiarity with this investigation, I believe that Maria RODRIGUEZ delivered heroin to William RODRIGUEZ at his residence.

On March 16, 2015, CRUZ-RIVERA Tasked Maria RODRIGUEZ to Deliver Ten Grams of Heroin to RAMOS, Who Redistributed the Heroin.

91. On March 16, 2015, agents intercepted a call between CRUZ-RIVERA and RAMOS during which RAMOS stated, "I need ten pesos." CRUZ-RIVERA told RAMOS,

“Give me fifteen minutes.” A short while later, RAMOS sent CRUZ-RIVERA a text message that stated, “Dad I need 10 pesos dad.” RAMOS then called CRUZ-RIVERA. During the call, which was intercepted, CRUZ-RIVERA stated, “Ivette’s going to be there in 3 minutes . . . she should be going in, in my gray truck.”

92. Agents were conducting surveillance that evening. At approximately 6:30 p.m., agents observed a truck known to be used by CRUZ-RIVERA depart the driveway at 10 Mador Avenue, which is the residence of Maria RODRIGUEZ, and travel to a nearby parking lot. At approximately 6:40 p.m., RAMOS was observed walking down the road and getting picked up by a vehicle with a Rhode Island registration. The car with RAMOS is it dove to the same parking lot as the truck and parked across from the truck. RAMOS exited the car he was in and got into the truck, which was being operated by Maria RODRIGUEZ. Approximately one minute later, RAMOS got out of the truck and got back into the car with the Rhode Island license plates. Maria RODRIGUEZ departed the area and returned to 10 Mador Avenue. Agents observed RAMOS and the woman operating the car he entered hunching down in the vehicle. Shortly thereafter, RAMOS got out of the vehicle, and the vehicle departed the area. I believe that RAMOS received ten grams of heroin from Maria RODRIGUEZ and distributed the heroin to the unknown female in the car with the Rhode Island registration.

93. Maria RODRIGUEZ’S criminal history includes a 1995 arrest for possession to distribute Class B and possession to distribute cocaine which was Continued Without a Finding.

William RODRIGUEZ

94. William RODRIGUEZ is a heroin redistributor based in Taunton. He obtains heroin from CRUZ-RIVERA via his mother, Maria RODRIGUEZ, and distributes it to a large group of customers who are heroin users and street-level distributors.

On November 4, 2014, Agents Seized Twenty Grams of Heroin Distributed by Will RODRIGUEZ.

95. On November 4, 2014, agents intercepted a series of text messages between a male identified as Chris White and Will RODRIGUEZ during which in which White requested “15.” In a subsequent text message to RODRIGUEZ, White stated, “Fuck it 20 peace nugget my jack buzzin.” RODRIGUEZ confirmed that White wanted “20,” and then they made arrangements to meet in the Mayflower Cemetery in Taunton. Agents were conducting surveillance that day. They observed White arrive at the cemetery and wait outside his car. They then saw a RODRIGUEZ arrive on a motorcycle. RODRIGUEZ got into White’s car with him. After a minute, RODRIGUEZ got out of the car, and he and White each departed the cemetery separately.

96. Police attempted to conduct a motor vehicle stop of White, but White failed to stop. White then pulled into a driveway, but when police approached, he began driving again, cutting through the driveway to an adjoining street. Ultimately, the chase ended when White hit a telephone pole. He then got out of his car and started to flee on foot. White was arrested for unlicensed operation. He and his car were searched, but nothing was recovered. Agents then traveled the chase route on foot. In the yard adjacent to the driveway that White had used as a cut-through, agents recovered just under twenty grams of heroin. After White was released on bail that evening, he went directly to the yard where the heroin was recovered and appeared to search around the area for an item.

97. Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ distributed the twenty grams of heroin to White in the Mayflower Cemetery, and that during the police chase, White discarded the heroin in the yard where it was recovered. I believe that White subsequently returned to the yard to recover the

heroin he had discarded.

On December 10, 2014, Police Arrested Will RODRIGUEZ and Seized Ten Grams of Heroin from Him.

98. On December 10, 2014, agents intercepted a text message from Will RODRIGUEZ to Maria RODRIGUEZ that stated, "Mommy remember that candy I got the other day for my cousin Jose?" Maria RODRIGUEZ affirmed, and Will RODRIGUEZ texted, "Now can you make that same one again and I was gonna go by and grab it." Maria RODRIGUEZ agreed.

99. Approximately an hour and ten minutes later, agents conducting surveillance observed Will RODRIGUEZ's car at 9 Martel Avenue, Taunton, which was Jose PEREZ's residence. While Will RODRIGUEZ's car was parked in the driveway, Will RODRIGUEZ called Maria RODRIGUEZ and stated "You gave me ten less. I needed the bigger one." Will RODRIGUEZ further stated, "I'm about to go back over there. I need ten more, though." Minutes later, agents observed Will RODRIGUEZ exit PEREZ's residence, return to his car, and travel to 10 Mador Avenue, Taunton, which is Maria RODRIGUEZ's residence. Approximately three minutes later, Will RODRIGUEZ departed 10 Mador Avenue and returned to 9 Martel Avenue, PEREZ's residence. When RODRIGUEZ exited his car at 9 Martel Avenue, police approached and arrested him for driving with a suspended license. During a search incident to arrest, they recovered ten grams of heroin from the cuff of his sweatpants.

100. Will RODRIGUEZ told police that he was a heroin addict. He then telephoned his mother and told her, in an intercepted call, that he had been arrested. Maria RODRIGUEZ then called CRUZ-RIVERA and told him that Will RODRIGUEZ had been arrested. During an intercepted call, CRUZ-RIVERA advised Maria RODRIGUEZ to take the "food" out of the house. Based on my training and experience, as well as my familiarity with this investigation, I

believe that Will RODRIGUEZ delivered heroin to Jose PEREZ, that he then obtained the ten additional grams of heroin from Maria RODRIGUEZ, and that he intended to deliver the ten grams to PEREZ. I further believe that CRUZ-RIVERA had supplied the heroin to Maria RODRIGUEZ and advised her to remove any additional heroin from her house when Will RODRIGUEZ was arrested in case police went to her house with a warrant.

101. William RODRIGUEZ' criminal history includes the following: a 2014 arrest for possession with intent to distribute a Class A substance and resisting arrest (which stems from the seizure in this case), which was continued without a finding, and a 2013 arrest for operating after a suspended license and a minor in possession of an alcoholic beverage, which was continued without a finding

Lindsay BELISLE

102. Lindsay BELISLE assists William RODRIGUEZ with heroin distribution. She delivers drugs and collects drug proceeds on his behalf, and she packages drugs for distribution. As set forth in paragraph 119-22 below, on September 18, 2014, BELISLE delivered 83 grams of heroin to Kelly PATTERSON on behalf of William RODRIGUEZ. In addition, on September 3, 2014, BELISLE delivered heroin to customer Tracy Pelletier; on September 4, 8, 10, and 15, 2014, and on October 1, 2014, BELISLE delivered heroin to defendant Jorge VEGA; on September 7, 8, 24, and 30, 2014, and on October 1, 2014, BELISLE delivered heroin to defendant Kelly GAGNON; and on October 21, 2014, BELISLE delivered heroin to defendant Joseph PARSONS.

103. BELISLE has no prior criminal convictions.

John GRAY

104. John GRAY is a heroin user and distributor who is based in Marshfield,

Massachusetts. He obtains heroin from Will RODRIGUEZ, among other sources, and redistributes it in street-level transactions. In August 2014, Alicia Nelson, one of GRAY's customers, overdosed on heroin and died. Approximately two weeks prior to her death, Nelson overdosed at GRAY's residence. Intercepted calls show that GRAY was aware that she was overdosing at the time, and his mother ultimately called paramedics. In September 2014, GRAY was arrested on state firearms charges. The charges were dismissed without prejudice in June 2015.

On July 11, 2014, GRAY Received Heroin from Julio OCASIO and Redistributed It to a Customer.

105. On July 11, 2014, agents intercepted calls over GRAY's telephone demonstrating that GRAY obtained heroin from Julio OCASIO and redistributed the heroin to a customer known as "Chipper." That day, GRAY called Chipper, and they discussed the price of a "quarter finger" and a "half." They also discussed the quality of "shit" that GRAY was getting, with GRAY telling Chipper that he was "getting the white, white shit, that fucking dangerous shit." Ultimately, Chipper agreed to purchase a quarter finger of heroin, and he and GRAY arranged to meet.

106. Shortly thereafter, GRAY was intercepted talking to Julio OCASIO. During the call, OCASIO told GRAY that he was "getting the shit ready, getting this work ready, just bagging up." GRAY then stated that he was outside OCASIO's house, and that he had "\$250." Agents conducting surveillance that day observed GRAY arrive and park down the street from OCASIO's house (5 Spring Street, Taunton). They observed GRAY get out of the car and walk to 5 Spring Street. They then observed GRAY and OCASIO meet in the driveway and on the porch of 5 Spring Street, where GRAY and OCASIO engaged in a hand-to-hand transaction.

107. After GRAY met with OCASIO, agents intercepted calls during which Chipper

and GRAY made arrangements to meet. Shortly thereafter, agents intercepted a call between Chipper and GRAY during which Chipper stated, "It's 1.65 with the bag. Are you fucking kidding me?" GRAY then told Chipper that his "dealer" had "weighed it" in front of GRAY, but that he would talk to his "guy" after he finished "making a play." GRAY also stated that he was going to "pick[] up a ball of coke" from his guy.

108. Based on my training and experience, as well as my familiarity with this investigation, I believe that GRAY purchased what he believed was 2.5 grams of heroin from OCASIO and redistributed the heroin to Chipper. I further believe that Chipper claimed that the heroin he received weighed only 1.65 grams, and that GRAY stated he would address the discrepancy with OCASIO when he picked up cocaine from OCASIO.

On July 14, 2014, GRAY Received Heroin from OCASIO and Distributed It to Customers.

109. On July 14, 2014, agents intercepted a call over Target Telephone #1 during which GRAY spoke with OCASIO. GRAY told OCASIO, "I need a quarter from you." OCASIO stated that he was in Lakeville, and he and GRAY agreed to meet. Agents were conducting surveillance that day. That afternoon, agents observed GRAY meet with OCASIO on the front porch of 10 Bow Street. Agents observed a hand-to-hand exchange between GRAY and OCASIO. Based on my training and experience, as well as my familiarity with this investigation, I believe that GRAY met with OCASIO and received 2.5 grams of heroin from him.

On July 27, 2014, Police Seized Heroin GRAY Had Ordered from a Supplier.

110. On July 25, 2014, agents intercepted a series of text messages between GRAY and Elton Fernandes a heroin supplier, during which GRAY arranged to purchase four bags of heroin from Fernandes. More specifically, during the text exchange, Fernandes texted GRAY,

“Ya send me ur address u want four of dem right?” GRAY asked, “How much for the four?” Fernandes responded, “120.” GRAY subsequently provided his address, 6 Castle Green, to Fernandes.

111. That day, agents were conducting surveillance at GRAY’s residence. Agents observed GRAY and his girlfriend hanging around the parking lot of the apartment building. They then observed Fernandes arrive at the residence and park his SUV. GRAY entered the apartment building and Fernandes followed. Fernandes exited a few minutes later and left the area. Based on my training and experience, as well as my familiarity with this investigation, I believe that Fernandes arrived at GRAY’s apartment to deliver four bags of heroin for \$120.

112. Two days later, on July 27, 2014, agents intercepted another series of text messages between GRAY and Fernandes. During the exchange, GRAY requested “four.” GRAY and Fernandes then agreed to meet in Abington. Based on intercepted text messages, Fernandes left GRAY waiting on the street at their meeting spot, which was located in a residential neighborhood. A concerned resident of the neighborhood called the police to report GRAY’s presence. The resident provided detailed information about a pattern of activity she had observed on Laurie Avenue over the prior weeks that she believed was indicative of drug distribution. As a result of her call, members of the Abington Police Department responded to the scene. When they arrived, they observed two cars leaving Laurie Avenue. The concerned resident pointed to a black car occupied by GRAY and Elton Fernandes and stated that it was the car she had seen on Laurie Avenue recently. Police stopped the black car and arrested Elton Fernandes, who was driving. Police recovered four small bags of heroin; the bags were located inside the driver’s door, on the ground, where they had landed after falling off of Fernandes’s pants, and in Fernandes’s waistband.

113. GRAY was the passenger in the black car and was not arrested. GRAY agreed to speak with officers and gave a written statement to them. He stated that he had gone to Laurie Avenue to buy heroin from Fernandes. He stated that the heroin he intended to purchase was for personal use.

On September 16, 2014, GRAY Was Arrested.

114. On September 16, 2014, agents intercepted a series of calls between GRAY and Will RODRIGUEZ that led them to believe that GRAY intended to rob Will RODRIGUEZ of approximately 100 grams of heroin. More specifically, that day, agents intercepted a call during which GRAY stated that he had recently been released from jail and that his mother had given him “five stacks,” or (\$5,000). GRAY asked RODRIGUEZ, “What can you do for me for five stacks?” RODRIGUEZ stated that he had “to do [his] math,” but that he could provide “[p]robably like 100 grams.” Agents knew that GRAY had not recently spent time in jail, and they noted that \$5,000 was far more money than GRAY normally had to purchase heroin. In the past, GRAY had purchased heroin from RODRIGUEZ in quantities of approximately five grams.

115. Over the course of the day, GRAY and RODRIGUEZ spoke several times. During the calls, GRAY changed the proposed timing and location of the transaction several times and made representations about his whereabouts that were inconsistent with agents’ surveillance of him. Agents became concerned that GRAY intended to rob RODRIGUEZ. RODRIGUEZ also became suspicious of GRAY, and he sent BELISLE, to the meeting location in his car while he followed in a borrowed car with which GRAY was not familiar. When RODRIGUEZ ultimately arrived to meet with GRAY at a carwash, and GRAY again attempted to change the meeting location (all of which was intercepted and surveilled), RODRIGUEZ was intercepted commenting on the fact that GRAY was with three other men and telling BELISLE,

“Just saying, he’s definitely trying to rob me. That’s the sad thing, in my opinion.” Ultimately RODRIGUEZ called off the transaction. GRAY continued to pressure RODRIGUEZ to do the transaction.

116. As a result of agents’ concerns about a robbery, the Taunton police conducted a motor vehicle stop of the car in which GRAY was riding as a passenger. The car at first refused to stop for the officer but ultimately pulled over. GRAY was the front seat passenger. There were three other males in the car. At the time, the driver of the car had a suspended license, and GRAY had an outstanding warrant. After the occupants were removed from the car, a Taunton police officer observed a firearm under the front passenger seat of the car. The firearm was recovered, and none of the occupants of the car claimed ownership of it or produced a license to carry a firearm. The firearm had an obliterated serial number. The occupants of the car were arrested and charged with unlicensed possession of a firearm. The gun was checked for fingerprints, and the fingerprints came back to Abel Suarez, another of the occupants of the car.

117. GRAY has a lengthy criminal history that includes the following, among other arrests: a June 2015 arraignment for assault and battery and assault and battery on a public employee, which is pending; April 2007 convictions for breaking and entering daytime, felony larceny, three counts of assault and battery, three counts of assault and battery with a dangerous weapon, threatening to commit a crime, assault with intent to kill, two counts of property violation, intimidation of a witness, resisting arrest, and two counts of assault and battery on a police officer, which charges led to GRAY being sentenced to two and a half years committed, and four years of probation; a January 2005 arrest for assault and battery with a dangerous weapon, assault and battery, two counts of malicious destruction of property, for which GRAY was convicted and received an 18 month suspended sentence; a December 2004 arrest for

operating after a suspended license, for which GRAY was found guilty and received a 6 month suspended sentence; a September 2004 arrest for possession of class B controlled substance, for which GRAY was convicted and received a one year suspended sentence; a March 2002 arrest for operating under the influence of liquor, for which GRAY was convicted and received a 9 month committed sentence; a July 1999 arrest for disorderly conduct, for which GRAY was found guilty and sentenced to 6 days committed sentence; a June 1999 arrest for assault with a dangerous weapon, and malicious destruction of property, for which GRAY was found guilty and sentenced to a 9 month committed sentence; a June 1998 arrest for disturbing the peace and possession of class D controlled substance, for which GRAY was found guilty and fined \$100; a March 1996 arrest for disturbing the peace, for which GRAY was fined \$62.50, and minor in possession of alcohol, which was continued without a finding; a November 1995 arrest for knowingly receiving stolen property, which was continued without a finding; a May 1994 arrest for two counts of assault and battery with a dangerous weapon, for which GRAY was given a one year suspended sentence and a six month committed sentence; a January 1994 arrest for larceny of a motor vehicle and conspiracy, for which GRAY was found guilty and received one and a half years of probation; a December 1993 arrest for assault to kill and assault and battery with a dangerous weapon, for which GRAY received nine months of probation; a September 1993 arrest for possession of class D controlled substance, which was continued without a finding; and an October 1992 arrest for assault and battery on a public servant, which was continued without a finding; as well as numerous motor vehicle violations.

Jose PEREZ

118. Jose PEREZ is Will RODRIGUEZ's cousin who is also a heroin customer and redistributor. During September 2014, PEREZ was badly injured in a motorcycle accident.

Based on intercepted calls, during PEREZ's hospital stay, his girlfriend, Kelly PATTERSON, took over his heroin distribution operation. Agents intercepted fairly explicit telephone calls during which PEREZ and PATTERSON conveyed as much to BELISLE and to Will RODRIGUEZ. For example, on September 4, 2014, agents intercepted a call during which BELISLE, who, based on the interceptions was at that time present with PATTERSON, told RODRIGUEZ, "[S]he's doing it for him. She's selling it." During an intercepted call the following day, PEREZ told RODRIGUEZ, "My girl is taking care of things." RODRIGUEZ and PEREZ then went on to discuss that PEREZ owed RODRIGUEZ "for thirty-six." RODRIGUEZ stated, "Whatever I gave you basically equaled to 100," and that PEREZ owed him "for forty, 1600." Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ meant that PEREZ owed him for forty grams of heroin, which was \$1600.

On September 18, 2014, Will RODRIGUEZ and Lindsay BELISLE Distributed 83 Grams of Heroin to Kelly PATTERSON and Jose PEREZ.

119. On September 18, 2014, agents intercepted a text message from PATTERSON to RODRIGUEZ that stated, "I'm ready to reup." She subsequently told RODRIGUEZ that she had "all 4000." During an intercepted call shortly thereafter, PATTERSON told RODRIGUEZ that she "still ha[d] some stuff left to sell to make that four." She stated that she was "200 short." RODRIGUEZ stated that he was also "gonna be short five or ten." RODRIGUEZ and PATTERSON then agreed to do the deal.

120. Agents were conducting surveillance that day, and approximately one hour after RODRIGUEZ spoke with PATTERSON, agents observed RODRIGUEZ's car at PATTERSON's house. The car was left running in the driveway for approximately twelve minutes. During the time that the car was in the driveway, agents intercepted a text message

from RODRIGUEZ to BELISLE that said, “Tell Kelly I owe her 17 g. I’ll bring in few.” Shortly thereafter, and also while the car remained in PATTERSON’s driveway, agents intercepted a call during which BELISLE told RODRIGUEZ, “He wanted 100.” RODRIGUEZ told BELISLE that he had sent only “83,” and he went on to say, “She ain’t gonna sell it quick anyways. That’s what I’m saying. When I go back, she can give me my 200 bucks, and I’ll give her the rest of it.”

121. On September 20, 2014, agents intercepted a call between Jose PEREZ and RODRIGUEZ during which PEREZ asked, “Yo, what’s good, can you get the rest of my work cuz?” RODRIGUEZ responded that he had been in touch with PEREZ’s “girl” and was waiting to hear back from her.

122. Based on my training and experience, as well as my familiarity with this investigation, I believe that on September 18, 2014, PATTERSON requested 100 grams of heroin from RODRIGUEZ. I believe that RODRIGUEZ sent BELISLE to deliver 83 grams of heroin to PATTERSON, who was distributing heroin on PEREZ’s behalf while he remained in the hospital. I believe that BELISLE collected \$3,800 in drug proceeds from PATTERSON when she delivered the heroin. I further believe that two days later, PEREZ called RODRIGUEZ and requested the missing seventeen grams of heroin. I believe that RODRIGUEZ agreed to deliver it to PATTERSON.

On November 7, 2014, Will RODRIGUEZ Distributed Heroin to Jose PEREZ.

123. On November 7, 2014, agents intercepted a text message in which Jose PEREZ requested “80” from Will RODRIGUEZ. RODRIGUEZ responded that he was “going for a ride” with CRUZ-RIVERA. Later that day, PEREZ texted RODRIGUEZ again, stating, “You cuz I don’t mean to rush you but my phone is rocking I’m missing mad play.” Ultimately, after

additional requests from PEREZ, RODRIGUEZ responded that he was “waiting for [his] mom.” PEREZ subsequently repeated that his phone was “rocking” and stated, “I missed 2000 yesterday.” Later that night, agents intercepted a text message from PEREZ to RODRIGUEZ that stated, “Yo cuz can I get the rest running low all ready.” Based on my training and experience, as well as my familiarity with this investigation, I believe that PEREZ requested 80 grams of heroin from RODRIGUEZ and stated that he was getting many calls from customers and missing out on transactions because he did not have heroin to distribute. I believe that RODRIGUEZ ultimately obtained heroin from his mother, Maria RODRIGUEZ, and distributed less than 80 grams to PEREZ. I believe that PEREZ then asked Will RODRIGUEZ for the remaining heroin that he had requested because he had distributed almost all of the heroin that he had obtained from RODRIGUEZ earlier.

124. Jose PEREZ has a prior criminal history that includes the following: a September 2009 arrest for possession of Class B, which was continued without a finding; a December 2007 conviction for uttering a false prescription; multiple drug arrests that were dismissed; and various other arrests

Kelly PATTERSON

125. Kelly PATTERSON is a heroin distributor based in Taunton, Massachusetts. PATTERSON took over Jose PEREZ’s drug distribution activities when PEREZ was injured in a motorcycle accident. PATTERSON’s distribution of heroin on behalf of PEREZ was discussed several times during intercepted telephone calls, as set forth above.

126. As set forth in paragraph 119-22 above, on September 18, 2014, RODRIGUEZ and BELISLE distributed 83 grams of heroin to PATTERSON, who received the heroin on behalf of PEREZ.

127. Kelly PATTERSON's criminal history includes a 2014 arrest for larceny, which is pending, and a 2000 arrest for operating with a suspended license, which was continued without a finding.

Jorge VEGA

128. Jorge VEGA is a street-level heroin distributor based in Taunton, Massachusetts. VEGA was frequently intercepted arranging to purchase heroin from William RODRIGUEZ. During the interception of Target Telephone # 2, Vega was intercepted participating in heroin transactions with Will RODRIGUEZ on September 2, 3, 4, 5 (two times), 6 (two times), 8 (two times), 9, 10, 11 (two times), 13, 15, 16, 18, 20, 21, 22, 23, 25, 26, and 27, 2014; and October 17 and 18, 2014.

On September 26-27, 2014, Will RODRIGUEZ Distributed 25 Grams of Heroin to Jorge VEGA

129. On September 26, 2014, agents intercepted a text message from Jorge VEGA to Will RODRIGUEZ that stated, "I need the Jordans size ten." VEGA then sent a second text message that stated, "Yo cuzzo add a 2 fizz to Jordans." Based on my training and experience, as well as my familiarity with this investigation, I believe that VEGA requested to purchase 12.5 grams of heroin from RODRIGUEZ. Agents were conducting surveillance that evening, and they observed VEGA arrive at RODRIGUEZ's house on a bike. Approximately fifteen minutes later, VEGA left the residence. Approximately ten minutes later, VEGA was stopped by police. Officers searched VEGA but did not recover anything from him. During the search, VEGA clenched his buttocks. Based on my training and experience, I believe that the heroin VEGA purchased from RODRIGUEZ may have been concealed there.

130. The following day, agents intercepted a series of text messages between Will RODRIGUEZ and VEGA that confirmed that VEGA had purchased 12.5 grams of heroin from

RODRIGUEZ on September 26. Specifically, on September 27, 2014, VEGA texted RODRIGUEZ, “Yo need the same.” RODRIGUEZ then replied, “12.5,” and VEGA confirmed. VEGA subsequently texted RODRIGUEZ, “Yo cuzzo pls I got a few ppls waiting ok.” Based on my training and experience, I believe that VEGA asked to purchase an additional 12.5 grams of heroin from RODRIGUEZ and asked if the transaction could take place quickly, as he had customers waiting on him.

131. On September 30, 2014, agents intercepted a text message from VEGA to RODRIGUEZ that stated, “Yo cuzzo what happens I couldn’t even give it for free they say that’s the worst. I’m stressed out cuzzo the rent is due in a few days please tell me u got some different.” Based on my training and experience, as well as my familiarity with this investigation, I believe that VEGA was complaining about the quality of the heroin he had received from RODRIGUEZ and was reporting that his customers had stated that it was very poor.

On September 27, 2014, RODRIGUEZ Distributed Twenty Grams of Heroin to Steven ENOS and Ten Grams of Heroin to VEGA.

132. On September 27, 2014, agents intercepted a text message from VEGA to Will RODRIGUEZ that stated, “Yo need the same.” RODRIGUEZ responded by text, “12.5?” VEGA affirmed.

133. Also that day, RODRIGUEZ received an intercepted text message from Steven ENOS. The text message stated, “Can you come thru for the same as lasttime?”

134. Thereafter, RODRIGUEZ was intercepted speaking to Darius Jones.¹ RODRIGUEZ instructed, “Make a twenty-gram and make a 12.5. I got that Puerto Rican dude.

¹ Jones was arrested in July 2015 and is currently facing charges in United States v. Darius Jones, 15-10239-FDS.

He wants 12.5, and then I gotta drop the twenty grams off on one exit up going towards Fall River.” That afternoon, Jones told RODRIGUEZ, “I got the twenty grams, and then I don’t got a 12.5. I only got 10.2.” Jones asked RODRIGUEZ, “How much are you charging him for the twenty?” RODRIGUEZ stated that he was charging “a thousand.” Then they agreed to meet in approximately ten minutes.

135. Agents were conducting surveillance that afternoon. They observed a car used by Jones in the driveway of RODRIGUEZ’s residence. Based on my training and experience, as well as my familiarity with this investigation, I believe that Jones was delivering approximately thirty grams of heroin to RODRIGUEZ. Approximately five minutes later, agents intercepted a text message from RODRIGUEZ to VEGA in which RODRIGUEZ instructed VEGA, “Go to Pine.” I believe that RODRIGUEZ arranged to meet VEGA to deliver approximately ten grams of heroin to him.

136. Later that afternoon, RODRIGUEZ received an intercepted text message from ENOS that stated, “Ok im outside.” RODRIGUEZ replied, “Pulling up.” Agents observed RODRIGUEZ travel to 41 Seymour Street, Berkeley. They observed ENOS approach RODRIGUEZ’s car on foot and meet briefly with RODRIGUEZ. I believe that RODRIGUEZ delivered twenty grams of heroin to ENOS.

137. Jorge VEGA’s criminal history includes a 2010 conviction for possession of a Class A substance, a 2009 conviction for possession of a Class A substance, a 1994 conviction for possession of a Class A substance with intent to distribute and possession of a sawed off shotgun, a 1992 conviction for possession to distribute Class A heroin, and a 1992 conviction for carrying a dangerous weapon.

Jose RODRIGUEZ

138. Jose RODRIGUEZ is a street-level heroin distributor based in Taunton, Massachusetts. RODRIGUEZ obtains heroin from William RODRIGUEZ. During the interception of Target Telephone # 2, Jose RODRIGUEZ was intercepted participating in heroin transactions with William RODRIGUEZ on September 3, 8, 16, 20, 22, 24, and 27, 2014; October 17 and 31, 2014; and November 1, 7, and 8, 2014.

On September 20, 2014, Will RODRIGUEZ Agreed to Distribute 2.5 Grams of Heroin to Jose RODRIGUEZ.

139. On September 20, 2014, agents intercepted a call during which Jose RODRIGUEZ asked Will RODRIGUEZ, “Cuzzo you got a two five?” Will RODRIGUEZ affirmed, and Jose RODRIGUEZ stated, “I was not even going to go get, but I ran out, and somebody just called me for some. I was like, I was not going to make the play, but I was like, fuck it, I could make a quick seventy.” Will RODRIGUEZ agreed, stating that he would send “his girl” over to Jose RODRIGUEZ. Jose RODRIGUEZ then offered to pay Will RODRIGUEZ with a “pink ten.” Based on my training and experience, as well as my familiarity with this investigation, I believe that Jose RODRIGUEZ was asking to purchase 2.5 grams of heroin from Will RODRIGUEZ, which he intended to redistribute to earn \$70. I believe that Will RODRIGUEZ agreed to sell the heroin to Jose RODRIGUEZ, that he stated he would send BELISLE to deliver it, and that he agreed to accept an oxycodone pill as payment for a prior transaction.

140. Jose RODRIGUEZ’s criminal history includes a 1995 conviction for possession to distribute Class B.

Christopher PEREZ

141. Christopher PEREZ is a street-level heroin distributor based in Taunton, Massachusetts. PEREZ obtained heroin from William RODRIGUEZ. During the interception of

Target Telephone # 2, Chris PEREZ was intercepted participating in heroin transactions with Will RODRIGUEZ on September 17, 19, 20, and 22, 2014; October 23 (twice), 24, 25, and 30, 2014; and November 1, 2, and 3, 2014. On October 1, 2015, agents seized approximately 100 grams of a substance that field tested positive for fentanyl from Perez's residence.

On October 23-24, 2014, Will RODRIGUEZ Distributed 15 Grams of Heroin to Chris PEREZ.

142. On October 23, 2014, agents intercepted a text message from Chris PEREZ to Will RODRIGUEZ that stated, "Bring me 2 and a half for now." Agents were conducting surveillance that day. They observed RODRIGUEZ's brother travel to RODRIGUEZ's residence. After a short time, he left the residence and drove to Friend Street and Kilmer Avenue in Taunton, where he picked up PEREZ, drove him down the block, and let him back out of the car. Based on my training and experience, I believe that RODRIGUEZ sent his brother to deliver 2.5 grams of heroin to PEREZ.

143. That afternoon, agents intercepted a call between PEREZ and RODRIGUEZ during which PEREZ stated, "I need five together, right? A half a finger together. And then I need a two and a half separate." RODRIGUEZ agreed, and PEREZ asked if RODRIGUEZ could "do it all" for "350." PEREZ stated, "I am short, I am just short like twenty bucks, like twenty-five bucks. And then once I get rid of this, then I am going to grab like ten." RODRIGUEZ agreed. That afternoon, agents observed RODRIGUEZ arrive at PEREZ's house. PEREZ came out of the house and he and RODRIGUEZ met briefly on the curb. RODRIGUEZ then left the area. Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ delivered 7.5 grams of heroin to PEREZ.

144. The following day, agents intercepted a call between PEREZ and RODRIGUEZ during which PEREZ asked, "You got five left?" RODRIGUEZ affirmed, and PEREZ went on

to say that he would “take that five,” but that he wanted RODRIGUEZ to deliver a gram and a half first, which he would distribute before taking the other 3.5 grams. RODRIGUEZ stated that he would “be right there.” Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ agreed to distribute 5 grams of heroin to PEREZ.

145. Christopher PEREZ’s criminal history includes a 2003 arrest for operating after a suspended license, which was Continued Without a Finding, as well as various drug-related arrests, all of which were dismissed.

Steven ENOS

146. Steven ENOS is a street-level heroin distributor. ENOS obtains heroin from William RODRIGUEZ. As set forth at paragraph 133-36 above, on September 27, ENOS received twenty of heroin from RODRIGUEZ. During the interception of Target Telephone #2, ENOS was intercepted participating in similar heroin transactions on September 27, 2014, October 15, 2014, and on November 1, 2014.

On November 1, 2014, Will RODRIGUEZ Distributed Twenty Grams of Heroin to Steven ENOS.

147. On October 29, 2014, agents intercepted a text message from Steven ENOS to Will RODRIGUEZ that stated, “Yo whats good with last couple times everyones complaining about it being to cut. Just letting u no.” RODRIGUEZ responded by text message, stating that “everyone” had complained and that he was surprised that ENOS had sold it. ENOS then texted RODRIGUEZ, “I no. I got 5 gz left Im sittin on till I get more an nobody want the shit.” Based on my training and experience, as well as my familiarity with this investigation, I believe that ENOS had previously received heroin from RODRIGUEZ, and that his customers had complained about the quality of the heroin. I further believe that ENOS still had five grams of heroin left that he had been unable to sell.

148. On October 31, 2014, ENOS sent an intercepted text message to RODRIGUEZ that stated, "Need 20." In an intercepted conversation later that day, ENOS asked, "You got something good though?" RODRIGUEZ replied, "100%. Shit's on fire." ENOS and RODRIGUEZ agreed to exchange text messages later to meet. The following day, ENOS texted RODRIGUEZ and stated that he figured RODRIGUEZ had been busy the day before, but that RODRIGUEZ should let him know when he could "come thru." RODRIGUEZ asked if ENOS was ready and then texted, "Omw." Based on my training and experience, as well as my familiarity with this investigation, I believe that ENOS had told RODRIGUEZ that he wanted to purchase twenty grams of heroin and had then inquired about the quality of the heroin RODRIGUEZ had available. I further believe that RODRIGUEZ assured ENOS that the heroin was very high quality. RODRIGUEZ then alerted ENOS when he was on his way to meet ENOS. I believe that RODRIGUEZ distributed twenty grams of heroin to ENOS.

149. Steven ENOS' criminal history includes a 2013 arrest for concealing leased property, which is pending, a 2009 conviction for operating negligently, a 2006 conviction for breaking and entering in the daytime with intent to commit a felony and larceny, a 2006 conviction for violating the abuse prevention act, a 2005 conviction for breaking and entering in the daytime with intent to commit a felony and larceny, and a 2004 arrest for malicious destruction of property, which was continued without a finding.

Philip MALAGUTI

150. Philip MALAGUTI is a street-level heroin distributor based in Taunton, Massachusetts. MALAGUTI obtains heroin from William RODRIGUEZ. During the interception of Target Telephone # 2, MALAGUTI was intercepted participating in heroin transactions with Will RODRIGUEZ on September 6 (twice), 10, 11, 21, 22, 23, 24, 25, 27

(twice), 28-29, and 30, 2014; October 1, 17, 21, and 30, 2014; and November 10, 2014.

On September 27-29, 2014, Will RODRIGUEZ Distributed 22.5 Grams of Heroin to Phil MALAGUTI.

151. On September 27, 2014, agents intercepted a text message from Philip MALAGUTI to Will RODRIGUEZ that stated, "I need a whole one." RODRIGUEZ then texted back, "5 or 10 u want?" MALAGUTI responded by text message, "10 whole stick." RODRIGUEZ and MALAGUTI then made arrangements to meet. Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ agreed to sell ten grams of heroin to MALAGUTI.

152. The following day, September 28, 2014, agents intercepted a text message from MALAGUTI to RODRIGUEZ that stated, "Ok another 10 but no ride." On September 29, 2014, MALAGUTI again texted RODRIGUEZ, stating, "I need that 10." RODRIGUEZ replied that he had fallen asleep, and MALAGUTI and RODRIGUEZ then arranged to meet. That evening, agents intercepted a text message in which MALAGUTI asked RODRIGUEZ for another "2.5." MALAGUTI and RODRIGUEZ then again made arrangements to meet. Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ agreed to distribute 12.5 grams of heroin to MALAGUTI that day. The quantities and frequency of MALAGUTI's heroin transactions with RODRIGUEZ are consistent with redistribution, rather than personal use, of the heroin.

153. Philip MALAGUTI's criminal history includes a June 2015 arrest for felony larceny and operating a motor vehicle negligently, for which there are currently two active warrants, a 2012 conviction for assault and battery, a 2012 conviction for larceny, a 2010 conviction for larceny, a 2010 conviction for assault with a dangerous weapon, a 2007 conviction for assault and battery with a dangerous weapon, and a 2004 conviction for assault and battery.

Luz GONZALEZ

154. Luz GONZALEZ assists ROMERO-GONSALEZ with his heroin distribution activities. GONZALEZ acts as a go-between for ROMERO-GONSALEZ and NICKERSON, among others.

155. As set forth above, in paragraphs 44-49, on February 20, 2015, GONZALEZ negotiated the terms of a heroin transaction between ROMERO-GONSALEZ and NICKERSON.

156. Luz GONZALEZ has a January 2014 arrest for trafficking in excess of 200 grams of heroin, which is pending.

Francis GONSALEZ-ROMERO

157. Francis GONSALEZ-ROMERO is a heroin customer of ROMERO-GONSALEZ. GONSALEZ-ROMERO also assists ROMERO-GONSALEZ with his drug distribution activities by acting as a go-between with CRUZ-RIVERA.

On March 3, 2015, Francis GONSALEZ-ROMERO Requested Heroin from ROMERO-GONSALEZ.

158. On March 3, 2015, agents intercepted a call during which Francis GONSALEZ-ROMERO asked ROMERO-GONSALEZ for “two loose ones” so that he could “complete for Raoul.” ROMERO-GONSALEZ asked for clarification, and GONSALEZ-ROMERO stated, “Like a little peanut, so I can complete Raoul’s.” ROMERO-GONSALEZ directed GONSALEZ-ROMERO to “some,” and GONSALEZ-ROMERO replied, “I used a little bit that was there. I made one yesterday, but I’m missing one, to give it to him today.” When ROMERO-GONSALEZ asked how many there had been the day before, GONSALEZ-ROMERO stated, “There were like seven yesterday.” GONSALEZ-ROMERO then repeated that he needed “one, one and a half, to give it to him, to complete something.”

159. Based on my training and experience, as well as my familiarity with this

investigation, I believe that GONSALEZ-ROMERO called ROMERO-GONSALEZ to ask if there was a small amount of heroin available that he could use to complete an order for Raoul. I believe that GONSALEZ-ROMERO stated that he had packaged heroin the previous day, and that he was attempting to complete another order but needed a small amount of additional heroin to do so.

On March 4, 2015, ROMERO-GONSALEZ Directed GONSALEZ-ROMERO to Give Adulterants to a Criminal Associate.

160. On March 4, 2015, agents intercepted a call during which ROMERO-GONSALEZ instructed GONSALEZ-ROMERO, "Lend Menor fifty little things. Crazy, that he is going to go get them." GONSALEZ-ROMERO clarified, "Of the cut?" ROMERO-GONSALEZ affirmed, and GONSALEZ-ROMERO stated, "Yes, I got some here." Based on my training and experience, as well as my familiarity with this investigation, I believe that ROMERO-GONSALEZ instructed GONSALEZ-ROMERO to lend fifty grams of cutting agent to a criminal associate, and that GONSALEZ-ROMERO agreed to do so.

161. Francis GONSALEZ-ROMERO has a criminal history that includes a 2014 arrest for giving a false document to an official, obstructing an officer in execution of duty and driving without a license, which is pending, and a 2013 arrest for Prohibited Weapons Other Than Firearms, for which the disposition is currently unknown.

Kelly GAGNON

162. Kelly GAGNON is a street-level heroin distributor based in Taunton, Massachusetts. GAGNON was regularly intercepted arranging to purchase heroin from William RODRIGUEZ. During the interception of Target Telephone # 2, GAGNON was intercepted participating in heroin transactions with William RODRIGUEZ on September 5, 7, 8, 9, 11, 17, 18, 19, 20, 22, 23, 25, and 30, 2014, and October 1, 2014. GAGNON currently has a pending

state-court case stemming from the seizure of seventeen grams of heroin from her. CRUZ-RIVERA and RAMOS were present when the heroin was seized from GAGNON.

On September 17, 2014, Will RODRIGUEZ Distributed Five Grams of Heroin to GAGNON.

163. On September 17, 2014, agents intercepted a text message from GAGNON to Will RODRIGUEZ that stated, “[N]eed five.” Immediately after Will RODRIGUEZ received the text message, he sent a text message to BELISLE that stated, “Make five.” GAGNON then texted Will RODRIGUEZ again and asked if he could “seperate [sic] it 3.5 & 1.5.” GAGNON later updated Will RODRIGUEZ on her whereabouts, texting, “Walking towards Maple.” Agents were conducting physical surveillance that day. They observed Will RODRIGUEZ leave 59 Oak Street, Taunton and travel to Maple Street. While on Maple Street, Will RODRIGUEZ pulled over, and GAGNON, who was on foot, entered the passenger side of his car. The car then left the area. Based on my training and experience, as well as my familiarity with this investigation, I believe that GAGNON ordered five grams of heroin from Will RODRIGUEZ and that Will RODRIGUEZ picked GAGNON up on Maple Street to deliver the heroin to her. I believe that GAGNON asked for the heroin to be broken up into two separate quantities because she intended to redistribute it.

164. Kelly Jean GAGNON’s criminal history includes the following: a January 2014 arrest for possession with intent to distribute heroin, which is pending; an October 2005 conviction for possession of class D narcotics; a December 2004, conviction for distribution and conspiracy to distribute class B narcotics; and various other arrests/convictions including assault and battery with a dangerous weapon.

Joseph PARSONS

165. Joseph PARSONS is a street-level heroin distributor based in Taunton,

Massachusetts. PARSONS obtained heroin from William RODRIGUEZ and introduced MALAGUTI to William RODRIGUEZ. During the interception of Target Telephone # 2, PARSONS was intercepted participating in heroin transactions with Will RODRIGUEZ on September 2, 8, and 13, 2014; October 19, 20, 23, and 24, 2014; and November 1, and 10, 2014. During each transaction, PARSONS requested between 1 gram and 2.5 grams of heroin.

On September 6, 2014, Will RODRIGUEZ Distributed Twenty Grams of Heroin to Joseph PARSONS.

166. On September 6, 2014, agents intercepted a text message from PARSONS to Will RODRIGUEZ that stated, "Need 20 gs." PARSONS subsequently inquired, "How much u do for 2 fings?" RODRIGUEZ replied, "550 each. 1100." Thereafter, RODRIGUEZ called Maria RODRIGUEZ and asked if she had "food" because someone had asked for "something big." RODRIGUEZ ultimately told Maria RODRIGUEZ that he had enough to fill the order. After Will RODRIGUEZ agreed to do the deal with PARSONS, PARSONS texted him and said, "He's got 1050. Can you do it or maybe take out a lil?" PARSONS then texted Will RODRIGUEZ and stated, "How long til u can get here we need it asap we have mad plays lined up its for my boy wit the street bike he can meet u somewhere if u want." Based on my training and experience, I believe that during this series of text messages, PARSONS arranged to buy two fingers, or twenty grams, of heroin from Will RODRIGUEZ. I believe that PARSONS ultimately asked to receive slightly less than twenty grams, and that PARSONS stated that it was for a friend who had customers waiting on him.

On September 24, 2014, Will RODRIGUEZ Distributed 2.5 Grams of Heroin to Joseph PARSONS and 2.5 Grams of Heroin to MALAGUTI.

167. On September 24, 2014, agents intercepted a text message in which Joseph PARSONS asked Will RODRIGUEZ, "[U] around for a 2.5?" Later that day, PARSONS sent a

second intercepted text message to RODRIGUEZ that sated, “I need a 2-5.” RODRIGUEZ told PARSONS to call him in twenty-five minutes. Thereafter, RODRIGUEZ told PARSONS, “10 minutes at the 138 carwash.” PARSONS sent a reply text message stating that he was driving a “greenish blue Audi.” Approximately half an hour later, RODRIGUEZ instructed PARSONS, “Come to the cemetery.” PARSONS agreed.

168. Also on September 24, 2014, agents intercepted a text exchange between RODRIGUEZ and MALAGUTI. MALAGUTI initially texted RODRIGUEZ, “2.5 at my house.” RODRIGUEZ replied, that he would be “like ten minutes” and that he wanted MALAGUTI to meet him. RODRIGUEZ stated that he was “on [his] bike, too.” He instructed MALAGUTI to meet at the cemetery. MALAGUTI agreed.

169. Agents were conducting surveillance that afternoon. At approximately 4:52 p.m., they observed an Audi enter the Mayflower Cemetery in Taunton. One minute later, agents observed MALAGUTI leave the cemetery riding a motorcycle. At approximately 4:56 p.m., agents observed the Audi leave the cemetery. Based on my training and experience, as well as my familiarity with this investigation, I believe that RODRIGUEZ delivered 2.5 grams of heroin to PARSONS and MALAGUTI in the cemetery.

170. Joseph PARSONS has a prior criminal history that includes a 2009 arrest for operating under the influence of liquor, which was continued without a finding, in addition to various other arrests, which were dismissed.

CONCLUSION

171. The defendants in this case are part of a heroin/fentanyl distribution organization that has extensively distributed heroin in Taunton, Fall River, New Bedford, Marshfield, and other communities in Massachusetts as well as Providence, Rhode Island. The distribution of

heroin/fentanyl has had a significantly negative impact on these communities. Based on the information contained in this Affidavit as well as the Indictment against said defendants, I respectfully request that each of the defendants in this matter should be detained pending trial.

Signed under the pain and penalties of perjury this 1st day of October, 2015.

A handwritten signature in black ink, appearing to read 'Kevin C. Hersey', written over a horizontal line.

Kevin C. Hersey
Special Agent
Drug Enforcement Agent