

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

M.J. Docket No. 21-MJ-1436

v.

1. VINCENT CARUSO,  
a/k/a "Fatz",
2. ERNEST JOHNSON,  
a/k/a "Yo Pesci," a/k/a "Mr. Live, Mr. Drive",
3. LAURIE CARUSO,
4. NICOLE BENTON,

Defendants

**PRELIMINARY AFFIDAVIT SUBMITTED IN SUPPORT OF GOVERNMENT'S  
MOTION FOR DETENTION**

I, Special Agent Craig R. Harvey, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since July 2018. I am currently assigned to the Boston Field Office, North Shore Gang Task Force ("FBI Task Force"). My background and experience are set forth in the affidavit supporting the application for criminal complaint.

2. I submit this supplemental affidavit concerning the Defendants in this case to document the results of search warrants that were executed on June 30, 2021. This information is preliminary and subject to supplementation and clarification, because it has been relayed to me by numerous other agents and law enforcement officers who involved in the simultaneous execution of search warrants and arrest warrants this morning. The information was relayed to me real-time and it is preliminary and subject to revision: amounts and times are approximate and may be further clarified once additional testing and review of materials and items is conducted.

3. On June 30, 2021, at 06:00 a search warrant was executed at CARUSO and JOHNSON's residence in Salem, Massachusetts. During the search a loaded Glock firearm, and a large-capacity magazine were located in the nightstand in CARUSO's bedroom. Still images of some of the items follow:







4. On June 30, 2021, at 06:00 a search warrant was executed at a stash location utilized by the CARUSO DTO located at a stash location in Lynn, MA. Through the use of a GPS Tracking Device on a vehicle and review of surveillance footage, CARUSO, BENTON and L. CARUSO were identified as coming and going from this apartment building, consistent with its use as a stash location. This premises was confirmed to be the same location depicted in the Snapchat videos by comparison of the kitchen furnishings and stove. Approximately 2000 pills and two drum magazines with ammunition was located, along with paraphernalia associated with the manufacturing of pressed fentanyl pills. Still images of some of the items follow:



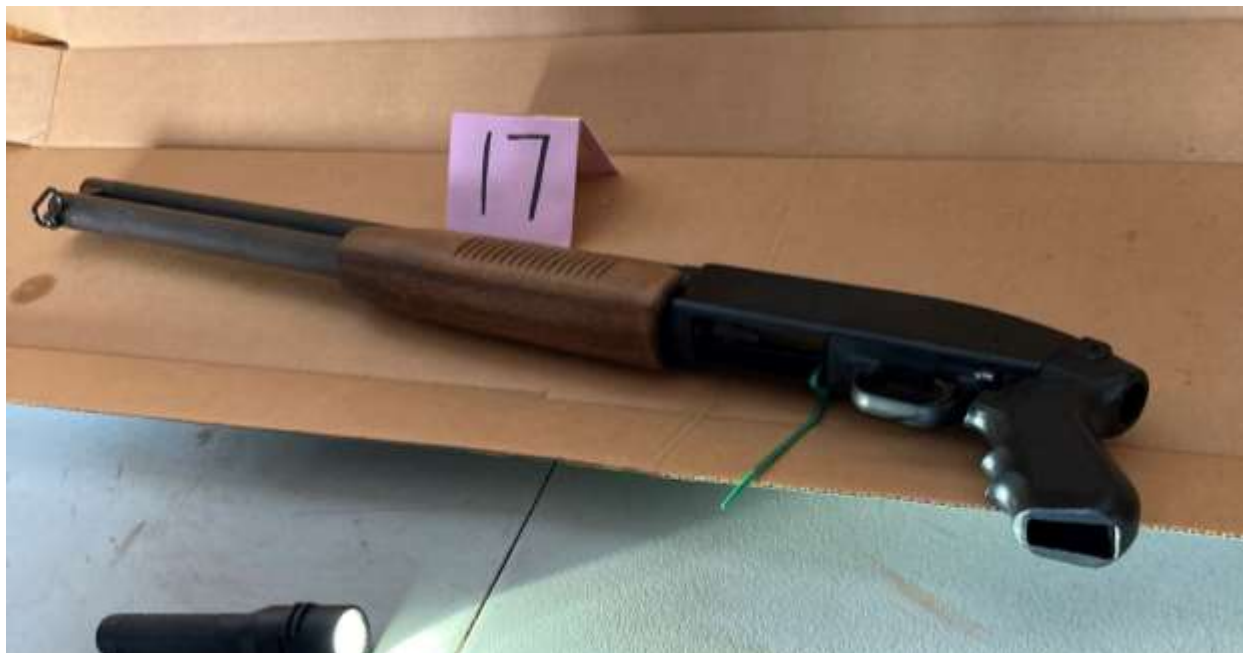


5. On June 30, 2021, at approximately 06:00 a search warrant was executed at a stash location utilized by the CARUSO DTO located in Lynn, MA. The premises is in fact a property owned by CARUSO's grandmother (L. CARUSO's mother) that has been used historically by the CARUSO DTO to conduct drug transactions and store items. During the search more than 10 firearms were located in a vehicle stored in the garage on the property, including a Glock firearm with a fully automatic selector switch. The search is ongoing at this premises. Still images of some of the items follow:









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6. On June 30, 2021, at approximately 06:00 a search warrant was executed at a location believed to be the residence of BENTON located in Saugus, MA. BENTON was placed under arrest. A firearm was located in her purse along with an amount of blue pills that I believe to be pressed fentanyl, red pills, and a blue substance believed to be fentanyl. Still images of the items follows:





7. This is just a preliminary statement. Searches are still ongoing at multiple locations as of the filing of this affidavit.

Signed under the penalties of perjury.

  
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Craig R. Harvey  
Special Agent  
Federal Bureau of Investigation

Date: 6/30/2021