

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

PHILLIP VEGA, aka "Moose," and
JACOB VEGA

CASE NUMBER:

UNDER SEAL**CRIMINAL COMPLAINT**

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

From in or about September 2015 to in or about October 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Section

21 U.S.C. § 846

Offense Description

conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1)

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.

THOMAS F. ASSELBORNSpecial Agent, Drug Enforcement Administration
(DEA)

Sworn to before me and signed in my presence.

Date: March 21, 2016

*Judge's signature*City and state: Chicago, Illinois

Jeffrey Cole, U.S. Magistrate Judge*Printed name and Title*

AFFIDAVIT

I, Thomas F. Asselborn, being duly sworn, state as follows:

1. I am a Special Agent with the Drug Enforcement Administration (“DEA”) and have been so employed since approximately January 1998. Prior to being a DEA Special Agent, I was employed by the Thornton Police Department in Thornton, Illinois, and the Glenwood Police Department in Glenwood, Illinois. When I joined the DEA, I underwent a 16-week intensive training program in drug enforcement. That training consisted of many aspects of drug enforcement, including drug identification, money laundering, computer use, legal requirements, electronic- and physical-surveillance techniques, defensive tactics, narcotics interdiction, interview and interrogation techniques, and firearms use. In May 1998, I was assigned to the DEA’s New York Field Division. While there, I participated in multiple investigations in which agents used a variety of investigative techniques to infiltrate drug-trafficking organizations. In June 2004, I was re-assigned to the Chicago Field Division, and I am currently assigned to the Chicago Strike Force.

2. I have received training and have experience in investigating violations of federal narcotics and money-laundering laws, including 21 U.S.C. §§ 841, 843, 846, 952, 959, and 963, and 18 U.S.C. § 1956(a). I have participated in numerous drug-trafficking and money-laundering investigations involving various

investigative techniques, including conducting physical and electronic surveillance, using cooperating witnesses and informants, conducting video and visual surveillance, questioning witnesses, monitoring controlled purchases and deliveries of narcotics, tracing narcotics proceeds, and obtaining and analyzing a wide variety of records and data. I have also been involved in the execution of numerous search warrants, arrests, and consent searches related to violations of federal law. Those investigative actions have covered the searches of locations such as vehicles, residences, and businesses. Evidence recovered in these searches has included multi-kilogram quantities of heroin, cocaine, and other narcotics, drug ledgers, large quantities of United States currency, and drug packaging and paraphernalia. I have participated in the debriefing and questioning of numerous defendants, witnesses, informants, and others who have knowledge of narcotics trafficking and laundering and concealing drug-trafficking proceeds.

3. I have participated in numerous investigations involving consensually monitored and consensually recorded telephone and in-person conversations involving informants and cooperating defendants, as well as numerous investigations involving court-authorized interceptions of wire and electronic communications (“Title III” or “wiretap” investigations). I have participated in the analysis and targeting of telephone numbers used in furtherance of drug-trafficking and money-laundering operations. I also have received specialized training in Title III investigations.

4. This affidavit is submitted in support of criminal complaints alleging that PHILLIP VEGA, LUIS NOCE, and JACOB VEGA committed narcotics violations. The information set forth in this affidavit is based on, among other things, my personal knowledge; information given to me by other DEA agents and other law enforcement agencies; my review of draft transcripts of court-authorized intercepted communications, reports, documents, and other evidence; and my training and experience. My descriptions of conversations in this affidavit are summaries based on my review of draft transcripts of the conversations, some of which have been translated from Spanish, my understanding of the context of the conversations, and my training, experience, and involvement in this investigation. Those descriptions are not based on final, verbatim transcripts, and the times listed for the conversations are approximate. Since this affidavit is offered for a limited purpose, I have not included a description of every topic discussed or every statement contained in the recorded conversations, and I have not included all of the facts known to me or other law enforcement agents about the investigation.

**FACTS SUPPORTING PROBABLE CAUSE
IN SUPPORT OF CRIMINAL COMPLAINTS**

Summary of the Investigation

5. As explained in more detail below, the DEA and CPD have been investigating narcotics-trafficking activities in the Chicago area. During the course of the investigation, law enforcement identified a cell of a cocaine-trafficking operation consisting of PHILLIP VEGA, LUIS NOCE, and JACOB VEGA. Chief Judge Ruben Castillo entered orders authorizing the interception of

communications to and from Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA. Some of those intercepted communications are summarized below.

6. PHILLIP VEGA, aka “Moose,” distributed cocaine to customers and unlawfully possessed a firearm after being convicted of a felony. More specifically, PHILLIP VEGA was intercepted coordinating narcotics transactions, law enforcement seized cocaine that he distributed to customers, and, while executing a search warrant at PHILLIP VEGA’s residence, and law enforcement found cocaine and a firearm that PHILLIP VEGA admitted were his.

7. LUIS NOCE, aka “Guido,” was a cocaine supplier to several wholesale customers. NOCE coordinated narcotics transactions with a cooperating witness, and, while executing a search warrant at NOCE’s Residence, law enforcement found cocaine and a firearm that NOCE admitted were his.

8. JACOB VEGA distributed cocaine with his father, PHILLIP VEGA. JACOB VEGA was intercepted coordinating narcotics transactions, law enforcement seized cocaine that he distributed, and he admitted to law enforcement that he had been dealing cocaine for years.

PHILLIP VEGA and LUIS NOCE Deliver Cocaine to CW1

9. On or about July 20, 2015, at approximately 11:33 a.m., surveillance observed PHILLIP VEGA pick up in his Ford pickup truck a man later identified as LUIS NOCE from a car-repair shop in Brookfield, Illinois. Law enforcement identified NOCE by comparing him to the man depicted in NOCE’s driver’s license photograph. Law enforcement was familiar with PHILLIP VEGA by conducting

surveillance of him on prior occasions and identifying him to the man depicted in PHILLIP VEGA's driver's license photograph.

10. Later that day, at approximately 2:24 p.m., surveillance observed PHILLIP VEGA and NOCE park behind NOCE's Residence in Berwyn, Illinois. Less than a minute later, surveillance observed NOCE enter the rear door of NOCE's Residence.

11. Approximately 10 minutes later, surveillance observed NOCE exit NOCE's Residence while holding what appeared to be a white envelope. Surveillance observed NOCE enter the passenger side of PHILLIP VEGA's Ford pickup truck, which PHILLIP VEGA drove away.

12. Later that day, at approximately 2:50 p.m., surveillance observed PHILLIP VEGA and NOCE meet with CW1 in Berwyn. During the meeting, NOCE appeared to hand CW1 a white envelope. PHILLIP VEGA and NOCE then got into PHILLIP VEGA's Ford pickup truck and left the area. CW1 got into another vehicle and drove away.

13. Surveillance followed CW1 and approached CW1 when CW1 got out of CW1's vehicle. After CW1 gave consent for law enforcement to search CW1's vehicle, law enforcement found inside the vehicle a white envelope containing approximately three clear plastic bags, each of which contained a white, powder substance that tested positive for the presence of cocaine and weighed approximately 8.7 grams.

14. Later that day, on July 21, 2015, CW1 waived CW1's rights and informed law enforcement that for the past five years CW1 has been purchasing "8 balls" of cocaine from NOCE, whom CW1 identified from photos on NOCE's Facebook page. CW1 stated that CW1 purchased from NOCE three or four 8-ball bags of cocaine per month for \$100 per bag. Based on my training and experience, an 8-ball is approximately 3.5 grams of cocaine.¹

15. On or about November 9, 2015, at approximately 3:02 p.m., CW1 sent a text message to NOCE's phone that said, "Wondered if you're around [to provide cocaine] or when you would be." NOCE's phone sent a response text message that said, "Later tonight. If not tomorrow."

16. Later that day, at approximately 8:15 p.m., CW1 sent a text message to NOCE's phone that said, "Hey.... I got [money to purchase] 4 [8-balls of cocaine].... Ok?" NOCE's phone responded, "Ok."

17. Later that day, at approximately 9:17 p.m., NOCE called CW1 in a call that law enforcement consensually monitored. During the conversation, NOCE said that he needed to stop at home to get "it [cocaine]" before meeting with CW1.²

18. Later that day, at approximately 9:50 p.m., NOCE had a consensually recorded telephone call with CW1. NOCE said, "I had got cleaned out [sold a lot of

¹ According to a law enforcement database, CW1 has no prior convictions. CW1 is cooperating with law enforcement with the hope of receiving reduced charges. The government has made no promises to CW1 regarding what, if any, benefits CW1 will receive in return for CW1's cooperation.

² As explained below, law enforcement is familiar with NOCE's voice based on an interview of him on November 10, 2015. Based on that interview, law enforcement identified NOCE as a speaker in this and other calls below listing him as a participant.

cocaine] last night. I haven't been able to wrap [package] any [cocaine to sell to customers].... I'll have to see you tomorrow. I'm totally sorry about that. I really forgot until I got in my house."

PHILLIP VEGA's Cocaine Sales to Individual A

19. On or about August 26, 2015, at approximately 12:57 p.m., surveillance observed PHILLIP VEGA arrive at and park in a parking lot in the Chicago area. Approximately four minutes later, surveillance observed a male, later identified as Individual A, exit the business and enter the passenger seat of PHILLIP VEGA's pick-up truck.

20. Approximately one minute later, surveillance observed Individual A exit PHILLIP VEGA's pick-up truck and appear to place something inside a vehicle, before re-entering a building near the parking lot. VEGA drove away approximately four minutes later.

21. Later that day, August 26, 2015, at approximately 3:12 p.m., surveillance observed Individual A exit the building, enter the vehicle Individual A appeared to have placed something in earlier, and drive away. After observing Individual A commit a traffic violation, law enforcement conducted a traffic stop, during which Individual A identified himself and consented to a search of the vehicle he was driving. Law enforcement subsequently found in Individual A's vehicle a small amount of marijuana and on Individual A's person less than one gram of a substance that tested positive for the presence of cocaine. Based on this seizure, my training and experience, and the following intercepted communications,

I believe that PHILLIP VEGA had a cocaine-distribution relationship with Individual A.

22. On or about October 9, 2015, at approximately 1:05 p.m. (Target Phone 20 session #1143), a phone used by Individual A sent a text message to Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA. The text message said, "200 [dollars-worth of cocaine is what Individual A wanted to buy]." Shortly thereafter (Target Phone 20 session #1145), Target Phone 20 sent a response text message that said, "K."

23. Later that day, at approximately 2:15 p.m. (Target Phone 20 session #1152), Target Phone 20 sent a text message to the phone used by Individual A that said, "5min."

24. Later that day, at approximately 2:20 p.m., surveillance observed PHILLIP VEGA park his Ford pickup truck in front of Individual A's residence. Individual A then exited the residence and entered PHILLIP VEGA's Ford pickup truck. After a short period of time, Individual A exited the pickup truck and entered his garage. PHILLIP VEGA then drove away.

25. Approximately two minutes later, law enforcement approached Individual A as he was again approaching his garage. Individual A provided law enforcement with written consent to search the garage and residence. Law enforcement subsequently recovered from a cabinet in the garage two bags of a substance that field tested positive for the presence of cocaine. Further, Individual

A identified the man depicted in PHILLIP VEGA's driver's license photograph as his cocaine supplier.

PHILLIP VEGA's Cocaine Sales to Individual B

26. On or about September 25, 2015, at approximately 6:08 p.m. (Target Phone 20 session #267), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B that said, "Can I get 3 [quantity of cocaine]." Approximately one minute later (Target Phone 20 session #267), Target Phone 20 responded, "Ya." Based on the October 5, 2015 cocaine seizure summarized below, my training and experience, and the following intercepted communications, I believe that PHILLIP VEGA had a cocaine-distribution relationship with Individual B.

27. Later that day, at approximately 7:01 p.m. (Target Phone 20 session #288), PHILLIP VEGA had a telephone conversation with Individual B. PHILLIP VEGA said, "I'll be right there." Individual B said, "Hurry up."³

28. On or about September 26, 2015, at approximately 8:49 a.m. (Target Phone 20 session #344), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B that said, "2 [quantity of cocaine]." Less than a minute later (Target Phone 20 session #345), Target Phone 20 sent a response text message that said, "Ok."

³ Law enforcement is familiar with PHILLIP VEGA's voice based on an interview with him on November 10, 2015, that is summarized below and a review of intercepted phone calls, coupled with corresponding surveillance. Based on the interview with PHILLIP VEGA, law enforcement identified him as a speaker in this and other calls below listing him as a participant.

29. Later that day, at approximately 10:16 a.m. (Target Phone 20 session #352), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, sent a text message to a phone used by Individual B that said, "Here I'm back of mc [a McDonald's where VEGA and Individual B had agreed to meet]."

30. On or about September 27, 2015, at approximately 4:33 p.m. (Target Phone 20 session #474), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B. The text message said, "Of course two [amount of cocaine] because you won't come for one - you selfish son of a..."

31. On or about September 28, 2015, at approximately 7:37 p.m. (Target Phone 20 session #520), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B. The text message said, "2 [8 balls of cocaine] for 220 [dollars] at life fitness in 40 minutes?" Approximately one minute later, Target Phone 20 responded, "Yes but 1 hour."

32. Later that day, at approximately 8:23 p.m. (Target Phone 20 session #532), PHILLIP VEGA had a telephone conversation with Individual B. VEGA said, "I'll be there, like, in five minutes." Individual B said, "I'll give you cash."

33. On or about September 30, 2015, at approximately 3:48 p.m. (Target Phone 20 session #632), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B that said, "Can you meet at life fitness at 6 for 220 [dollars-worth of cocaine]." Later

that day (Target Phone 20 session #657), PHILLIP VEGA had a telephone conversation with Individual B, during which PHILLIP VEGA said he was almost where he and Individual B had agreed to meet.

34. On or about October 5, 2015, at approximately 4:56 p.m. (Target Phone 20 session #913), a phone used by Individual B sent a text message to Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA. The text message said, "Can you come out tonight [to deliver cocaine] by 7...[?]" Approximately three minutes later (Target Phone 20 session #920), Target Phone 20 sent a response text message that said, "Binny's [liquor store]."

35. Later that day, at approximately 7:00 p.m. (Target Phone 20 session #948), PHILLIP VEGA had a telephone conversation with Individual B. Individual B asked, "Where the fuck are you?" PHILLIP VEGA answered, "Parked right here at Home Depot."

36. At approximately the same time, surveillance observed Individual B arrive in a west-suburban Home Depot parking lot and park next to PHILLIP VEGA's Ford pickup truck. Less than a minute later, Individual B exited his vehicle and entered PHILLIP VEGA's Ford pickup truck on the passenger side. Approximately two minutes later, Individual B exited PHILLIP VEGA's Ford pickup truck and re-entered his vehicle.

37. At approximately the same time, surveillance observed Individual B exit his vehicle and enter the Home Depot. Approximately 10 minutes later, Individual B exited the Home Depot, entered his vehicle, and drove away.

38. A short time later on the same day, October 5, 2015, law enforcement stopped Individual B for a traffic violation. During the traffic stop, Individual B provided law enforcement with consent to search. Law enforcement subsequently recovered from the vehicle approximately 5.1 grams of a substance that tested positive for the presence of cocaine.

39. On or about October 9, 2015, at approximately 11:16 a.m. (Target Phone 20 session #1114), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B that said, "Robert [one of Individual B's narcotics associates] wants to meet for lunch at 1:30. For 3 [amount of cocaine]." Approximately two minutes later (Target Phone 20 session #1115), Target Phone 20 responded, "Ok 130 same place."

40. Later that day, at approximately 2:07 p.m. (Target Phone 20 session #1341), Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, received a text message from a phone used by Individual B that said, "Robert is asking if you want to meet him at his lot at 4:30." Approximately 51 minutes later (Target Phone 20 session #1347), Target Phone 20 responded, "How much he got?" Approximately 29 minutes later (Target Phone 20 session #1348), the phone used by Individual B answered, "2 [8 balls of cocaine]." Less than one minute later, Target Phone 20 replied, "Ok."

PHILLIP VEGA's and JACOB VEGA's Cocaine Sales to Individual C

41. On or about September 22, 2015, at approximately 10:53 p.m. (Target Phone 20 session #63), PHILLIP VEGA had a telephone conversation with

Individual C. PHILLIP VEGA said, "I'm parking across the street." Individual C said, "Okay, I'll tell her to come down then [to obtain cocaine from PHILLIP VEGA]." PHILLIP VEGA asked, "She's bringing dude's [one of Individual C's associates] money, right?" Individual C answered, "Yes." Based on the October 16, 2015 cocaine seizure summarized below, my training and experience, and the following intercepted communications, I believe that PHILLIP VEGA and JACOB VEGA had a cocaine-distribution relationship with Individual C.

42. On or about October 1, 2015, at approximately 8:07 p.m. (Target Phone 20 session #732), PHILLIP VEGA had a telephone conversation with Individual C. PHILLIP VEGA said, "Tell him to walk down that same block where the bar is at [so PHILLIP VEGA could provide him with cocaine]." Individual C said, "Okay." PHILLIP VEGA said, "[T]ell him to have a fuckin' paper in his hand or something, an envelope or something [to help conceal the cocaine transaction]."

43. On or about October 5, 2015, at approximately 6:33 p.m. (Target Phone 20 session #942), a phone used by Individual C sent a text message to Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, that said, "I'll throw 40 [dollars] in my car and do a g [buy one gram of cocaine]?" Target Phone 20 responded, "Ya 30 min."

44. On or about October 15, 2015, at approximately 2:02 p.m. (Target Phone 20 session #1433), a phone used by Individual C sent a text message to Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA, that said, "Can u do [sell] a g[ram of cocaine] til tmrw." Target Phone 20 sent a response text

message (Target Phone 20 session #1517) that said, “I’m on my way to Colorado. I think j [JACOB VEGA] is around.” Later that day, at approximately 8:01 p.m. (Target Phone 20 session #1520), Target Phone 20 sent a text message to a phone used by Individual C that said, “I’m giving him da phone now.”

45. On or about October 16, 2015, at approximately 8:28 a.m. (Target Phone 20 session #1531), a phone used by Individual C sent a text message to Target Phone 20, a phone used by PHILLIP VEGA and JACOB VEGA. The text message said, “Ay when I get back up u gonna be around [to sell narcotics]? I’m lookn for a lil of both [cocaine and another narcotic] 40/20.” At approximately 8:29 a.m. (Target Phone 20 session #1532), Target Phone 20 sent a response text message that said, “Yea.”

46. Later that day, at approximately 3:31 p.m. (Target Phone 20 session #1589), Individual C’s phone sent a text message to Target Phone 20 that asked, “Where are u”? At approximately 3:32 p.m. (Target Phone 20 session #1590), Target Phone 20 sent a response text message that said, “Gundo [Gunderson, which, according to JACOB VEGA, is JACOB VEGA’s Residence].”

47. Later that day, at approximately 4:25 p.m. (Target Phone 20 session #1595), JACOB VEGA had a telephone conversation with Individual C. JACOB VEGA stated, “Yeah, I’m turning on Austin right now. So I’ll be walking towards

you like.” Individual C responded, “Okay. I’m still sitting here. I just keep getting passed by the same cop is all.”⁴

48. Later that day, at approximately 4:28 p.m. (Target Phone 20 session #1596), JACOB VEGA had a telephone conversation with Individual C. JACOB VEGA said, “Yeah, if you want, you could come into the alley. I’m walking down that way.” Individual C responded, “Alright.”

49. Around the same time, surveillance observed a woman later identified as Individual C driving a vehicle and turn down the alley behind JACOB VEGA’s Residence. Less than a minute later, surveillance observed JACOB VEGA exit JACOB VEGA’s Residence and enter Individual C’s vehicle on the front passenger side. Law enforcement identified JACOB VEGA by comparing him to the man depicted in JACOB VEGA’s driver’s license photograph. Less than a minute later, JACOB VEGA exited the vehicle and walked toward JACOB VEGA’s Residence.

50. A few minutes later, law enforcement stopped Individual C’s vehicle for a traffic violation. During the encounter, Individual C provided law enforcement with verbal consent to search the vehicle. Law enforcement subsequently recovered from the center console a clear, plastic bag containing a substance that weighed approximately one gram and subsequently tested positive for the presence of cocaine.

⁴ Law enforcement agents are familiar with JACOB VEGA’s voice based on an interview with him on November 10, 2015, that is summarized below and a review of intercepted phone calls, coupled with corresponding surveillance of JACOB VEGA. Based on the interview with JACOB VEGA, law enforcement identified him as a speaker in this and other calls below listing him as a participant.

51. Later that day, October 16, 2015, at approximately 4:53 p.m. (Target Phone 20 session #1601-02), a phone used by Individual C sent text messages to Target Phone 20 that said, "Got pulled over and they searched the car the dude obviously found my shit because it's gone but he took it and didn't say anything to his partner because they let me go."

52. On or about October 17, 2015, at approximately 8:43 p.m. (Target Phone 20 session #1642), JACOB VEGA had a telephone conversation with Individual C, who said, "I'll take a 40 [\$40-worth of cocaine]." JACOB VEGA responded, "Alright, for sure."

53. On or about October 19, 2015, at approximately 6:41 p.m. (Target Phone 20 session #1705), a phone used by Individual C sent a text message to Target Phone 20 that said, "I got one [person who wants to buy cocaine] and possibly 2 who want. R u around and who is this?" Target Phone 20 sent a response text message (Target Phone 20 session #1708) that said, "Yea and jr [JACOB VEGA was using Target Phone 20]." Later that day, at approximately 6:52 p.m. (Target Phone 20 session #1711), a phone used by Individual C sent a response text message that said, "If u don't wanna meet w them lmk [let me know] and I'll do it. And pops [PHILLIP VEGA] hooks me up for doin it [providing cocaine customers], so it's all up to u." Target Phone 20 sent a reply text message that said, "Ill do it."

PHILLIP VEGA, LUIS NOCE, and JACOB VEGA Admit Their Involvement in Cocaine Trafficking

54. On or about November 10, 2015, agents executed search warrants at PHILLIP VEGA's residence and NOCE's Residence. During the searches, agents

found, among other things: (1) at PHILLIP VEGA's residence approximately 60 grams of a substance that tested positive for the presence of cocaine, a 9 millimeter Glock, 17, semi-automatic handgun, a .40/.357 caliber Sig Sauer magazine, a Glock 9 millimeter extended magazine, approximately 56 rounds of ammunition, and a digital scale; (2) from PHILLIP VEGA's person approximately 6.8 grams of a substance that tested positive for the presence of cocaine; and (3) at NOCE's Residence approximately 713 grams of a substance that tested positive for the presence of cocaine, a Glock model 22 handgun, gun magazine, ammunition, and two scales.

55. Later that day, PHILLIP VEGA, NOCE, and JACOB VEGA waived their rights and spoke with agents. PHILLIP VEGA informed agents that the cocaine and gun found in his house were his. NOCE informed agents that the cocaine and gun found in his house were his. JACOB VEGA informed agents that he has been selling marijuana and cocaine for about three years.

Conclusion

56. Based on the above information, I respectfully submit that there is probable cause to believe that the above-listed individuals committed the corresponding narcotics offenses.

FURTHER AFFIANT SAYETH NOT.

THOMAS F. ASSELBORN
Special Agent
Drug Enforcement Administration

SUBSCRIBED AND SWORN
to before me on March 21, 2016.

Jeffrey Cole
United States Magistrate Judge