

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

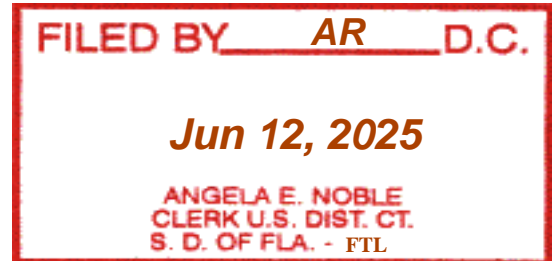
CASE NO. 25-MJ-6390-Valle

UNITED STATES OF AMERICA

v.

TAVARIS MORAES DOE,

Defendant.



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No.
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No.
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No.
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Nicholas Y. Carré
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UNITED STATES DISTRICT COURT

for the
Southern District of Florida

FILED BY AR D.C.

Jun 12, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

United States of America
v.

TAVARIS MORAE DOE,

Case No. 25-MJ-6390-Valle

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

On or about the date(s) of June 11, 2025 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute a Controlled Substance.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

Complainant's signature

Justin Herzlich, Special Agent, ATF

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by

Date: June 12, 2025

Judge's signature

City and state: Fort Lauderdale, Florida

Honorable Alicia O. Valle, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Justin Herzlich, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since approximately 2007. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am empowered by law to conduct investigations of, and make arrests for, firearms offenses enumerated in Title 18 of the United States Code, and narcotics offenses enumerated in Title 21 of the United States Code.

2. I submit this affidavit based on information known to me personally from the investigation, as well as information obtained from others who were directly involved in the matter or have personal knowledge of the facts herein.

3. This affidavit is submitted for the limited purpose of establishing probable cause to obtain a criminal complaint charging Tavaris Morae Doe (“DOE”) with distribution of a controlled substance, that is, Cocaine Hydrochloride, commonly known as “cocaine,” in violation of Title 21, United States Code, Section 841(a)(1).

PROBABLE CAUSE

Background Investigation

4. In or around April 2025, law enforcement received information from an ATF confidential informant (“CI”)¹ regarding a potential narcotics trafficker, later identified as DOE, who was distributing narcotics within the Franklin Park neighborhood of Broward County, Florida. The CI provided information that DOE was previously in federal prison for narcotics violations. The information that the CI provided stated that DOE supplies large quantities of marijuana and

¹ The CI is a convicted felon and not currently facing any pending criminal charges. He/she is receiving compensation for his/her cooperation.

cocaine for sale.

April 30, 2025: UC and CI Controlled Buy from DOE

5. On or about April 30, 2025, a law enforcement officer acting in an undercover capacity (“UC”), accompanied by the CI, conducted a controlled purchase of one (1) ounce of marijuana for \$180.00 from DOE in the vicinity of 2301 NW 8th Court, Fort Lauderdale, Florida.² DOE and the CI arranged the meeting through cellular communication.

6. At approximately 12:27 P.M., The UC and CI then traveled to 2135 NW 7th Street, Fort Lauderdale, Florida (the “Residence”). This location was a suspected residence for DOE. Upon arrival, the UC parked the undercover vehicle (“UCV”) and called DOE and advised that the UC and CI had arrived. DOE told the UC to follow him to another location. The UC agreed and a short time later, the UC observed DOE exit the Residence and get into a gray Honda sedan bearing Florida Tag number 64DUSI.

7. The UC then followed DOE approximately one-half (.5) mile to an apartment complex located in the vicinity of 2301 NW 8th Court, Fort Lauderdale, Florida (the “Lenox Apartments”). DOE was then observed exiting the vehicle and walking between the apartment buildings. A short time later, DOE returned and walked up to the passenger side window of the UCV. DOE passed two plastic bags containing a green leafy substance, believed by the CI to be marijuana. The CI then handed the plastic bags to the UC. The UC handed DOE \$180.00 in exchange for the suspected marijuana. Prior to leaving, DOE claimed he could provide the UC with cocaine for \$600.00 per ounce. The UC advised DOE they would call when ready to purchase the cocaine. DOE then left the UCV and was observed walking back towards the apartment buildings.

² Law enforcement suspects that DOE uses this location for narcotics distribution.

8. This transaction was audio and video recorded, which could be monitored by law enforcement in real time.

9. Following the transaction, law enforcement recovered the suspected marijuana from the UC. The suspected marijuana weighed approximately 30 grams, including packaging.

May 6, 2025: UC and CI Controlled Buy from DOE

10. On or about May 6, 2025, the UC, accompanied by the CI, conducted a controlled purchase of one (1) ounce of marijuana for \$180.00 and one half (.5) ounce of cocaine for \$300.00 from DOE in the vicinity of 2301 NW 8th Court, Fort Lauderdale, Florida. DOE and the CI arranged the meeting through cellular communication. During a pre-recorded call between DOE and the CI, DOE requested the UC and CI meet at his “trap house,” which was believed to be located at 2301 NW 8th Court, Fort Lauderdale, Florida. In my training and experience, I know that the phrase “trap house” usually refers to a location where illicit drugs are being brought and sold.

11. At approximately 12:06 P.M., law enforcement began conducting electronic surveillance. The UC and CI then travelled to 2301 NW 8th Court, Fort Lauderdale, Florida (“Building 2301”). The UC parked the UCV in front of Building 2301.

12. At approximately 12:17 P.M., DOE arrived at the Lenox Apartments in a gray Honda sedan. DOE was observed wearing a black and gold shirt with tan shorts, exiting the gray Honda sedan and then walking to the corner of Building 2301.

13. Shortly thereafter, DOE exited Building 2301 and signaled for the UC to drive up to him. The UC moved the UCV across the street and DOE approached the front passenger window of the UCV. DOE then reached into his front waistband and retrieved two (2) plastic bags: one containing the suspected marijuana and the other containing the suspected cocaine. DOE passed

both bags through the window. The UC then handed DOE \$480.00 in exchange for the suspected narcotics, which consisted of \$180.00 for the suspected marijuana and \$300.00 for the suspected cocaine. The DOE and the UC then arranged for DOE to sell the UC two (2) ounces of cocaine on or about May 8, 2025. DOE agreed walked back towards Building 2301, and the UC and CI departed the area.

14. This transaction was audio and video recorded, which could be monitored by law enforcement in real time.

15. Following the transaction, law enforcement recovered the suspected marijuana and cocaine from the UC. The suspected marijuana weighed approximately 28.2 grams, including packaging. The suspected cocaine weighed approximately 16 grams, including packaging, and field-tested positive for the presumptive presence of cocaine. A Drug Enforcement Agency (“DEA”) Laboratory analyzed the white powdery material in the plastic bag and determined it was 14.39 grams (net weight) of cocaine hydrochloride.

May 8, 2025: UC Controlled Buy from DOE

16. Between on or about May 7 and 8, 2025, the UC and DOE exchanged text messages to coordinate a controlled purchase of two (2) ounces of cocaine for \$1,200.00 from DOE in the vicinity of Building 2301 in the Lenox Apartments.

17. At approximately 1:14 P.M., law enforcement began conducting electronic surveillance. At DOE’s request, the UC travelled to Building 2301. At approximately 1:24 P.M., the UC arrived at the Lenox Apartments and parked adjacent to Building 2301.

18. At approximately 1:35 P.M., DOE arrived in a gray Honda sedan and parked in front of Building 2301. DOE walked over to the UCV and entered the front passenger seat. DOE then handed the UC a clear plastic bag containing suspected cocaine. The UC handed DOE

\$1,200.00 in exchange for the suspected cocaine. The UC told DOE that more cocaine would be needed in the future. DOE stated to call him when the UC was ready. DOE then exited the UCV and the UC departed the area.

19. This transaction was audio and video recorded, which could be monitored by law enforcement in real time.

20. Following the transaction, law enforcement recovered the suspected cocaine from the UC, which field-tested positive for the presumptive presence of cocaine. The suspected cocaine weighed approximately 56.9 grams, including packaging. A DEA Laboratory analyzed the white powdery material in the plastic bag and determined it was 56.1 grams (net weight) of cocaine hydrochloride.

May 20, 2025: UC Controlled Buy from DOE

21. Between on or about May 19 and 20, 2025, the UC and DOE exchanged phone calls and text messages to coordinate a controlled purchase of three (3) to four (4) ounces of cocaine from DOE on May 20, 2025. The UC and DOE agreed to meet at Building 2301.

22. On May 20, 2025, at approximately 12:44 P.M., the UC arrived at Building 2301. However, DOE then told the UC on the phone to meet DOE at the Marathon gas station located 3090 W. Sunrise Blvd., Fort Lauderdale, Florida.

23. After arriving and parking at the Marathon gas station, the UC advised DOE of the UC's arrival. Shortly thereafter, DOE arrived in a gray Honda sedan. DOE exited the vehicle and walked over to the front passenger door of the UCV. DOE entered the front passenger seat and pulled a clear plastic bag from his front waistband. DOE handed the UC a bag containing the suspected cocaine. The UC then handed DOE \$2,400.00 in exchange for the suspected cocaine. DOE counted the currency while the UC weighed the cocaine. The UC and DOE discussed

possible transactions for other narcotics. Thereafter, DOE returned to his vehicle and departed the area. The UC also departed the area.

24. This transaction was audio and video recorded, which could be monitored by law enforcement in real time.

25. Following the transaction, law enforcement recovered the suspected cocaine from the UC, which field-tested positive for the presumptive presence of cocaine. The suspected cocaine weighed approximately 115 grams, including packaging. A DEA Laboratory analyzed the white powdery material in the plastic bag and determined it was 111.9 grams (net weight) of cocaine hydrochloride.

May 28, 2025: UC Controlled Buy from DOE

26. Between on or about May 27 and 28, 2025, the UC and DOE exchanged phone calls and text messages to coordinate a controlled purchase of five (5) ounces of cocaine from DOE on May 28, 2025, at the Marathon gas station located 3090 W. Sunrise Blvd., Fort Lauderdale, Florida 33311—the same location where the prior transaction occurred.

27. On May 28, 2025, the UC contacted DOE via text message and advised that the UC was ten minutes away from the Lenox Apartments. The UC also sent DOE a text message requesting one (1) additional ounce of cocaine. After the UC arrived at the Lenox Apartments, UC contacted DOE and DOE requested to meet at the Marathon gas station located at 3090 W. Sunrise Blvd., Fort Lauderdale, Florida.

28. Shortly after the UC arrived, DOE also arrived in a gray Honda sedan. DOE exited his vehicle and entered the front passenger seat of the UCV. DOE then handed the UC a clear plastic bag, which contained the suspected cocaine. The UC then handed DOE \$3,000.00 in

exchange for the suspected cocaine. After discussing additional future narcotics sales, DOE exited the UCV and returned to his vehicle. The UC then departed the area.

29. This transaction was audio and video recorded, which could be monitored by law enforcement in real time.

30. Following the transaction, law enforcement recovered the suspected cocaine from the UC, which field-tested positive for the presumptive presence of cocaine. The suspected cocaine weighed approximately 143 grams, including packaging.

June 11, 2025: UC Controlled Buy from DOE

31. Between on or about June 10 and 11, 2025, the UC and DOE exchanged phone calls and text messages to coordinate a controlled purchase of nine (9) ounces cocaine from DOE, in the vicinity of Building 2301.

32. Shortly after the UC arrived, the UC observed DOE the UCV. DOE then entered the front passenger seat of the UCV. Once inside the UCV, the UC observed a black plastic bag in which DOE retrieved from inside his waistband. UC began to count the agreed upon funds in preparation to exchange with DOE for the sale of cocaine. Shortly thereafter, law enforcement approached the UCV and took DOE into custody without incident.

33. Following the transaction, law enforcement recovered the suspected cocaine from DOE's person, which field-tested positive for the presumptive presence of cocaine. The suspected cocaine weighed approximately 249 grams, including packaging.

34. Law enforcement also recovered the following:

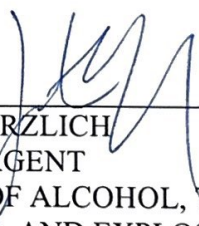
- a. Twenty-two (22) pills of suspected MDMA, which field-tested positive for the presumptive presence of MDMA (also known as ecstasy), weighing approximately 12 grams total, including packaging;

- b. One (1) additional small clear bag of suspected cocaine, which field-tested positive for the presumptive presence of cocaine, weighing approximately 4 grams, including packaging;
- c. Thirty-nine (39) small clear bags containing an unknown white substance, weighing approximately 9 grams total, including packaging; and
- d. Eight (8) small baggies of suspected synthetic cathinones which field-tested positive for the presumptive presence of N-Ethylhexedrone and Alpha-PiHP, both cathinones, weighing approximately 6 grams total, including packaging.

CONCLUSION

35. Based on the aforementioned, I respectfully submit that there is probable cause to believe that DOE possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



JUSTIN HERZLICH
SPECIAL AGENT
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS, AND EXPLOSIVES

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime on this 12th day of June 2025.



HONORABLE ALICIA O. VALLE
UNITED STATES MAGISTRATE JUDGE