


Approved:   
MAGGIE LYNAUGH  
Assistant United States Attorney

Before: THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA	:	<b><u>COMPLAINT</u></b>
	:	
- v. -	:	Violations of
	:	21 U.S.C. §§ 841 & 846
JUAN EFREN PAULINO,	:	
a/k/a "Freddy,"	:	COUNTY OF OFFENSE:
	:	NEW YORK
Defendant.	:	
	:	
-----	X	

SOUTHERN DISTRICT OF NEW YORK, ss.:

MOISES WALTERS, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA"), and charges as follows:

**COUNT ONE**  
(Conspiracy to Distribute Narcotics)

1. From at least in or about January 2023 through the present, in the Southern District of New York and elsewhere, JUAN EFREN PAULINO, a/k/a "Freddy," the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that JUAN EFREN PAULINO, a/k/a "Freddy," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances involved in the offense were 500 grams and more of mixtures and substances containing detectable amounts of methamphetamine, its salts, isomers, or salts of its isomers, and 400 grams and more of mixtures and substances containing detectable amounts of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
(Distribution of Narcotics)

1. On or about May 31, 2023, in the Southern District of New York and elsewhere, JUAN EFREN PAULINO, a/k/a “Freddy,” the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and aided and abetted the same.

2. The controlled substances involved in the offense were 500 grams and more of mixtures and substances containing detectable amounts of methamphetamine, its salts, isomers, or salts of its isomers, and 400 grams and more of mixtures and substances containing detectable amounts of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A); Title 18 United States Code, Section 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with the DEA, currently assigned to the El Dorado Task Force. The El Dorado Task Force is a joint task force with the Department of Homeland Security, Homeland Security Investigations (“HSI”) that is focused on combatting drug trafficking and money laundering. I have been a Special Agent with the DEA for over ten years. I have been personally involved in this investigation. This affidavit is based on my involvement in this investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my participation in this investigation, I know that since at least April of 2023, law enforcement officers have been aware of suspicious activity taking place in the basement of a particular residential building (“Building-1”) in Washington Heights, New York. In particular, based on both my own review of security camera footage from the basement of Building-1, and conversations I have had with other law enforcement officers who have reviewed security camera footage from the basement of Building-1, I know that on many nights since at least April 2023, adult men – including JUAN EFREN PAULINO, a/k/a “Freddy,” the defendant – can be seen on the footage passing through the basement laundry room and entering parts of the basement that are not visible on camera. The men can be seen carrying boxes, bags, and luggage both in and out of the basement. Much of their activity occurs late at night.

5. Based on conversations I have had with other law enforcement officers who have spoken with the managers and owners of Building-1, I know that the areas of the basement the men on the security camera footage can be seen entering are not available for use by residents, and there is no readily apparent legitimate reason for the men to be entering the areas of the basement they can be seen entering during late-night hours.

*The Search of the Basement of Building-1*

6. Based on my participation in this investigation and communications I have had with other law enforcement officers, I know that on the evening of May 31, 2023, law enforcement officers conducted a search of the basement of Building-1, based on consent obtained from the owner of Building-1. During the course of that search, law enforcement officers observed JUAN EFREN PAULINO, a/k/a “Freddy,” the defendant, in a particular area of the basement of Building-1. The area in which PAULINO was located was an area law enforcement officers understood to be generally used by the superintendent of Building-1 (the “Superintendent”) as a workspace. Accordingly, after securing PAULINO, and in an abundance of caution, law enforcement officers contacted the Superintendent of Building-1 and obtained consent to search the areas of the basement of Building-1 used by the Superintendent as a workspace.

7. Based on my participation in this investigation, I know that during the search of the basement of Building-1, law enforcement officers encountered large quantities of what appears to be narcotics, as well as the materials necessary to press narcotics into pill form. In particular, law enforcement officers encountered three commercial-grade pill presses, one commercial mixer, approximately 200,000 pills, and blocks, baggies, and buckets of powder. A sampling of the items encountered by law enforcement are pictured below.



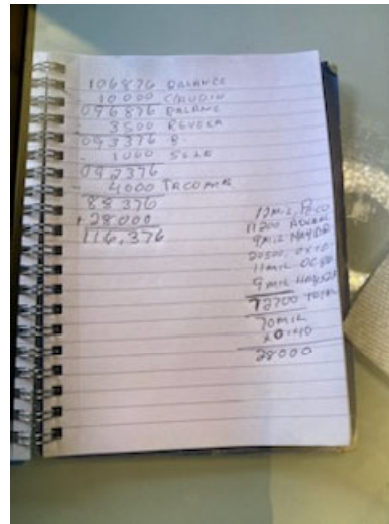
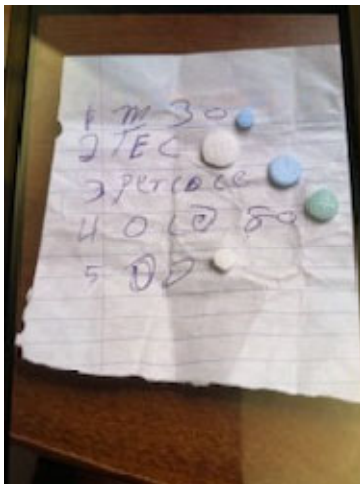


8. Although lab testing is pending for the pills and powders discovered during the search, preliminary spectrometry tests reveal that the powders have tested positive for, among other things, fentanyl, methamphetamine, and cocaine.

*Paulino's Post-Arrest Statements and the Contents of His Phone*

9. Based on conversations I have had with other law enforcement officers, I know that following JUAN EFREN PAULINO's, a/k/a/ "Freddy's," the defendant's, arrest after the discovery of narcotics in the basement of Building-1, and after PAULINO was advised of his *Miranda* rights, and waived those rights in writing, PAULINO stated, among other things, in sum and substance that he was in the basement of Building-1 to obtain a sample of cocaine to give to someone, and that he had been working in the basement for approximately six months.

10. Based on conversations I have had with other law enforcement officers and my review of photographic evidence, I know that JUAN EFREN PAULINO, a/k/a "Freddy," the defendant, additionally consented to law enforcement officers reviewing the contents of his cellphone. A limited review of that phone reveals numerous photographs of what appear to be narcotics, including many of the same types of narcotics found in the basement of Building-1. There are also photographs of what appear to be ledgers related to narcotics. The following is a selection of photographs found on the phone.



WHEREFORE, I respectfully request that JUAN EFREN PAULINO, the defendant, be imprisoned or bailed, as the case may be.

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MOISES WALTERS  
Special Agent  
Drug Enforcement Administration

Sworn to before me  
this 1st day of June, 2023

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THE HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK