

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

25 MAG 966

UNITED STATES OF AMERICA

v.

ABDUL ZAHIR QADEER,
a/k/a “Haji Abdul Zahir,”

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 924, 3238,
and 2; 21 U.S.C. § 963

SOUTHERN DISTRICT OF NEW YORK, ss.:

NICHOLAS DIFRANCESCO, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration (“DEA”), and charges as follows:

COUNT ONE
(Narcotics Importation Conspiracy)

1. From at least in or about November 2024, through in or about the date of the filing of this Complaint, in Afghanistan, South Africa, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, and others known and unknown, would and did manufacture, distribute, and possess with intent to distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances that ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, conspired to (i) import into the United States and into the customs territory of the United States from a place outside thereof, and (ii) manufacture, distribute, and possess with intent to distribute, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, were (i) one kilogram and more of mixtures and

substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A); and (ii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 960(b)(1)(H).

(Title 21, United States Code, Section 963; and Title 18, United States Code, Section 3238.)

COUNT TWO
(Possession of Machineguns and Destructive Devices)

5. From at least in or about November 2024, through in or about the date of the filing of this Complaint, in Afghanistan and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the narcotics importation conspiracy charged in Count One of this Complaint, knowingly used and carried firearms, and, in furtherance of such crime, knowingly possessed firearms, and aided and abetted the use, carrying, and possession of firearms, including machineguns that were capable of automatically shooting more than one shot, without manual reloading, by a single function of the trigger, as well as destructive devices.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(B)(ii), 3238, and 2.)

COUNT THREE
(Conspiracy to Possess Machineguns and Destructive Devices)

6. From at least in or about November 2024, through in or about the date of the filing of this Complaint, in Afghanistan and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 924(c).

7. It was a part and an object of the conspiracy that ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, and others known and unknown, would and did, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the narcotics importation conspiracy charged in Count One of this Complaint, knowingly use and carry firearms, and, in furtherance of such drug trafficking crime, knowingly possess firearms, including machineguns that were capable of automatically shooting more than one shot, without manual reloading, by a single function of the trigger, as well as destructive devices, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

(Title 18, United States Code, Sections 924(o) and 3238.)

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

8. I have been a DEA Special Agent since 2019. I am currently assigned to the DEA Special Operations Division's Bilateral Investigations Unit, which focuses on international criminal activities, including international narcotics and weapons trafficking. During my time as a DEA Special Agent, I have become familiar with some of the ways in which narcotics traffickers operate, and I have participated in numerous investigations involving international narcotics and weapons trafficking. This affidavit is based upon my participation in the investigation of this matter, including my conversations with law enforcement agents and other individuals, my review of photographs and recorded communications, and my review 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. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

Overview

9. As set forth in greater detail below, since at least in or about November 2024, the DEA has been investigating ABDUL ZAHIR QADEER, a/k/a "Haji Abdul Zahir," the defendant, and others working with and for QADEER, for their involvement in international narcotics and weapons trafficking.

10. Based on publicly available information, I know that ABDUL ZAHIR QADEER, a/k/a "Haji Abdul Zahir," the defendant, is a former member of Afghanistan's National Assembly, which functioned as the legislature of Afghanistan until the Taliban regained control of the country in or about August 2021, and that QADEER was elected First Deputy Speaker of the National Assembly's House of the People in or about 2012. QADEER previously served as a General in Afghanistan's Border Force, a paramilitary police organization responsible for securing Afghanistan's border, commanding its Eighth Border Battalion in Takhar Province, Afghanistan.

11. ABDUL ZAHIR QADEER, a/k/a "Haji Abdul Zahir," the defendant, is also a large-scale international narcotics and weapons trafficker. Recently, and as further detailed below, QADEER has engaged in extensive negotiations with an individual who, unbeknownst to QADEER, was a confidential source ("CS-1")¹ working at the direction of the DEA. More specifically, in or about November 2024, CS-1 began communicating with QADEER about their potential partnership in trafficking hundreds of kilograms of heroin and methamphetamine for importation into and sale in the United States for a purported drug trafficking organization (the "DTO"), with which CS-1 was purportedly working. As an early step in their partnership, on or about December 10, 2024, QADEER sold a two-kilogram test shipment of methamphetamine

¹ CS-1, who has known QADEER since in or about 2010, has provided information to the DEA in exchange for financial compensation since in or about 2024. Prior to becoming a confidential source with the DEA, CS-1 was previously arrested in another country and charged with fraud, and those charges remain pending. Information provided by CS-1 in this investigation has been found to be reliable and has been corroborated by other evidence, including the recorded communications and seized narcotics described herein.

delivered to CS-1's associate in Johannesburg, South Africa, in exchange for \$14,000. Thereafter, QADEER continued to negotiate with CS-1 regarding the sale to the DTO of hundreds of kilograms of heroin and methamphetamine, along with hundreds of assault rifles, heavy machine guns, pistols, rocket propelled grenades ("RPGs"), and grenades, which CS-1 represented would be used by the DTO to protect its drug trafficking activities.

November 2024: QADEER and CS-1 Discuss Potential Drug Transactions

12. Based on my participation in this investigation, including my conversations with law enforcement agents, confidential sources, and other individuals; my review of DEA reports; and my review of photographs, videos, and electronic and recorded communications, as well as draft transcripts and summaries of such communications, I have learned, among other things, the following:

a. In or about November 2024, CS-1 began communicating over encrypted voice and electronic messaging applications² with ABDUL ZAHIR QADEER, a/k/a "Haji Abdul Zahir," the defendant, about their potential partnership in future large-scale drug transactions.³

b. On or about November 9, 2024, during a telephone call with QADEER, CS-1 represented that CS-1 was laundering millions of dollars in drug proceeds for the DTO, operating in Africa.⁴ CS-1 told QADEER that the DTO, which CS-1 purported to represent, purchases approximately 400 to 600 kilograms of drugs at a time, was not satisfied with the quality of drugs being provided by the DTO's current supplier, and was looking for a new source of supply.⁵ QADEER said he could help supply CS-1 and the DTO, and explained that he was a "teacher," and the "people who are doing these things" (i.e., the drug suppliers) in Afghanistan were his "students." In addition, QADEER told CS-1, "I'm ready to play any kind of game which is making money," and QADEER explained that this type of transaction would be "easy" for QADEER.

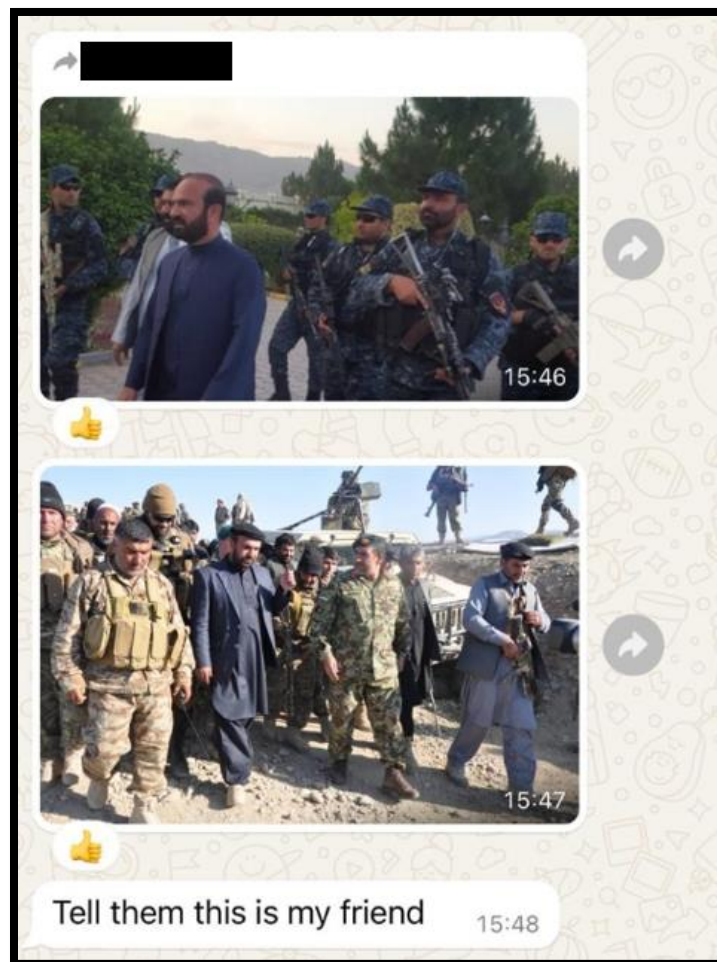
² QADEER communicated with CS-1 using multiple encrypted messaging applications. Unless otherwise noted, all messages and voice recordings referenced herein were sent via encrypted messaging applications.

³ All actions by CS-1 described herein were taken at the direction of the DEA.

⁴ All telephone calls referenced herein were recorded. All direct quotations from the recorded calls described in this Complaint are preliminary and are subject to change.

⁵ During this call, CS-1 used the phrase "product which you have in Afghanistan" to refer to drugs. In response, QADEER said, "Yeah, I know, I understand." Throughout CS-1's and QADEER's conversations, they generally referred to the heroin and methamphetamine they were discussing as "product." Based on my training and experience, and as reflected in the conversations described in this Complaint, I know that drug traffickers commonly use the term "product" to refer to narcotics.

c. Later that same day, QADEER sent CS-1 multiple electronic messages, including the two photographs of QADEER below,⁶ in which he is surrounded by armed guards, along with the message, “[t]ell them this is my friend.”



d. The next day, on or about November 10, 2024, during a telephone call, CS-1 told QADEER that the DTO was interested in working with QADEER to obtain “the best quality from Afghanistan.” QADEER responded that he was interested in working with the DTO, and he asked CS-1 to send him information concerning “which kind of thing” (*i.e.*, the types and quantities of drugs) the DTO wished to purchase. QADEER discussed growing “poppy” in Afghanistan, and

⁶ QADEER is dressed in a blue jacket in the front-left of the top image, and he is dressed in a blue jacket toward the left of the bottom image. I recognize this individual as QADEER based on my review of publicly available information and media reports containing photographs of QADEER, as well as a screenshot of QADEER’s passport that QADEER sent to CS-1 during the investigation. CS-1, who has seen QADEER in person numerous times, has also confirmed that the individual pictured is QADEER.

he confirmed that he could provide the DTO with “product” (*i.e.*, narcotics) anywhere in the world.⁷

e. QADEER and CS-1 continued to discuss potential drug transactions in telephone calls and voice messages over the following days. For example, in a voice message sent to CS-1 on or about November 11, 2024, QADEER explained that he would be “watching” and “controlling” his suppliers, and that he understood how to deal with suppliers and dealers in Afghanistan. During a telephone call the next day, on or about November 12, 2024, CS-1 told QADEER that the DTO sends its “KGs” (*i.e.*, kilograms of drugs) to New York, Canada, the Netherlands, and Australia, for distribution and sale in those locations. CS-1 explained that CS-1 was laundering tens of millions of dollars for the DTO resulting from the DTO’s sale of approximately 550 kilograms of heroin at a time, and that the DTO purchases that amount of heroin every two to three months. QADEER assured CS-1 that it would be “very easy” to supply the DTO with “what we have” in Afghanistan, and then send the drugs to wherever in the world the DTO wished to receive them. QADEER further said that he wanted to obtain a new telephone, to be used to speak only with CS-1 and the DTO, for “safety reasons.”

f. On or about November 13, 2024, during a telephone call, CS-1 told QADEER that the DTO wanted to purchase a sample of approximately four to six kilograms of high-quality heroin, to be received in Africa and then sent to the United States and elsewhere for testing. QADEER responded that he would find a sample of heroin that CS-1 would “love.” QADEER also explained to CS-1 that the Taliban controlled Afghanistan, causing the price of “kilos” (*i.e.*, kilograms of drugs) there to fluctuate, but that if QADEER had money and a strong team, the Taliban would cooperate with him. QADEER further said that, in the future, he wanted to speak with CS-1 using a different encrypted communications service than the one they had been using.

g. During a second telephone call that same day, CS-1 explained to QADEER that once the heroin sample was purchased from QADEER and sent to the United States, the DTO would then purchase between 700 kilograms and one ton (*i.e.*, 1,000 kilograms) of heroin from QADEER. QADEER responded that he would contact government officials in Afghanistan involved in narcotics trafficking, who were purchasing “poppy” land (*i.e.*, land used for the production of heroin), and ask those officials to be on QADEER’s “team.”

h. During subsequent telephone calls between on or about November 14 and 18, 2024, QADEER explained to CS-1 that he could sell the DTO kilograms that are brown, white, or “shisha,” as well as injectable heroin.⁸ QADEER and CS-1 continued to discuss and negotiate pricing for the drugs. QADEER and CS-1 also continued to discuss CS-1 purchasing, on behalf of

⁷ Based on my training and experience, I know that the poppy plant produces opium that can be manufactured into controlled substances such as heroin.

⁸ Based on my training, experience, discussions with other law enforcement agents, and involvement in this investigation, I believe that QADEER’s references to brown and white refer to different forms and purity levels of heroin. I further know that “shisha” is used in Afghanistan as slang for methamphetamine, because in Farsi, “shisha” translates to “glass,” and methamphetamine, in its crystal form, resembles glass. Accordingly, throughout their communications, CS-1 and QADEER often refer to methamphetamine as “shisha.”

the DTO, a pure, white injectable heroin sample from QADEER in Africa, which would then be sent by the DTO to New York and elsewhere for testing. QADEER instructed CS-1 to tell the DTO QADEER's name and to show the DTO a picture of QADEER. QADEER said that he could provide whatever quantity CS-1 and the DTO needed and offered 1,000 kilograms or 2,000 kilograms as an example of the quantity he could provide. QADEER also told CS-1 that his drug trafficking associates in Afghanistan were scared about being arrested by the United States government as a result of the transactions being negotiated, but QADEER told CS-1 that he had assured his associates that if anyone were to be arrested, it would be QADEER, not them.

i. On or about November 18, 2024, during a telephone call, QADEER asked CS-1 to send him \$20,000 per kilogram for the sample of heroin they had discussed. During a telephone call the next day, CS-1 told QADEER that the DTO had concerns that the price quoted by QADEER was too high.

December 2024: QADEER Sells a Two-Kilogram Sample of Methamphetamine to CS-1

j. After CS-1 represented to QADEER that the DTO had concerns with the price quoted by QADEER for the sample of heroin, QADEER and CS-1 began instead to discuss an initial transaction involving a sample of methamphetamine.

k. On or about November 23, 2024, during a telephone call between QADEER and CS-1, QADEER agreed to provide CS-1 and the DTO with a two-kilogram sample of methamphetamine, to be delivered in Africa. CS-1 explained to QADEER that half of the sample would be sent by the DTO to New York to test its quality, before the DTO made a larger order. QADEER acknowledged this and assured CS-1 that he had no problem with this plan.

l. During subsequent telephone calls between on or about November 27 and December 5, 2024, QADEER agreed to deliver the two-kilogram sample to CS-1 and the DTO in Johannesburg, South Africa on December 10, 2024, for subsequent testing and distribution by the DTO in New York City. CS-1 told QADEER that if the DTO determined the sample to be high-quality, the DTO would then negotiate a larger methamphetamine transaction with QADEER, again for eventual distribution in New York City.

m. On or about December 7, 2024, during a telephone call, QADEER agreed that CS-1 would pay QADEER \$14,000 for the sample of methamphetamine. QADEER instructed CS-1 to send the payment to QADEER's nephew in Afghanistan ("CC-1") via a hawala service⁹ identified by QADEER, and QADEER thereafter sent CS-1, via text message, a copy of CC-1's Afghan national identification card. On or about December 9, 2024, another confidential source working at the direction of the DEA ("CS-2"¹⁰) sent \$14,000 to CC-1 via the hawala service, as

⁹ Based on my training and experience, I am aware that a hawala is a type of informal money-remitting service.

¹⁰ CS-2 has been providing information to law enforcement since in or about 2018, in exchange for monetary compensation. Information provided by CS-2 in this investigation has been found to be reliable and has been corroborated by other evidence obtained by law enforcement.

QADEER had directed.¹¹ On or about December 10, 2024, during a telephone call with CS-1, QADEER confirmed receipt of the payment and said that CS-2 would be contacted by another of QADEER's associates, who would deliver the two-kilogram sample to CS-2 in Johannesburg.

n. Later that same day, on or about December 10, 2024, CS-2 was contacted via an encrypted messaging application by an individual who identified himself as "Lucky" and instructed CS-2 to meet him at a restaurant in Johannesburg. CS-2 met "Lucky" at the agreed-upon restaurant later that day, and, after a brief conversation, "Lucky" directed CS-2 to follow him to a nearby parking lot. Once in the parking lot, "Lucky" opened the back rear door of his vehicle for CS-2. CS-2 retrieved a black bag (the "Bag") from the vehicle, and "Lucky" said that the drugs contained in the Bag were of good quality. CS-2 then left the location and provided the Bag to South African law enforcement agents for evidence collection.

o. South African law enforcement agents searched the Bag and found two plastic containers, each marked with a distinctive green stamp depicting a camel (the "Stamped Containers"). A photograph of the Stamped Containers is below:



¹¹ All actions by CS-2 described herein were taken at the direction of the DEA.

p. The contents of the Stamped Containers were subsequently weighed and field-tested by DEA agents and determined to contain approximately two kilograms of a substance that field-tested positive for methamphetamine.

q. On or about December 11, 2024, CS-1 sent a photograph of the Stamped Containers to QADEER and asked if the Stamped Containers were the packages of methamphetamine that QADEER had sent to CS-1. QADEER confirmed that the Stamped Containers were indeed the methamphetamine packages from QADEER.

r. On or about January 15, 2025, during a telephone call, CS-1 informed QADEER that the purchased methamphetamine had arrived in New York and that the DTO planned to test it. Then, on or about January 24, 2025, during another telephone call, CS-1 told QADEER that the DTO had tested the drugs in New York and was “very happy” with the results, and that the DTO was prepared to move forward with purchasing 500 to 600 kilograms of methamphetamine and 500 to 600 kilograms of heroin.

January 2025: QADEER Agrees to Sell Weapons to the DTO

s. On or about January 4, 2025, during two telephone calls, CS-1 asked QADEER if QADEER could provide machineguns, rifles, and other weapons. QADEER explained that his contacts (the “Suppliers”) could provide rifles, but only in “huge” quantities such as 200 or 300 rifles per order. QADEER also told CS-1, “Listen, . . . I know what we need, I’m a fighter. I told [the Suppliers] I need Kalashnikov, I need PK, I need RPGs, I need DShK.”¹²

t. On or about January 8, 2025, during a telephone call, CS-1 told QADEER the following: (i) the DTO uses its own ships to smuggle heroin, cocaine, and methamphetamine, among other substances; (ii) the DTO previously used commercial ships, but it was too risky because the DTO lost their narcotics to “Navy SEALs” who checked the containers on the ships; (iii) the DTO has since purchased its own ships but requires weapons to protect their narcotics; and (iv) the DTO intends to use the weapons to fight “U.S. guards,” “Navy SEALs,” and pirates. During the same phone call, in response to CS-1, QADEER confirmed, “I know these things, brother,” and “No problem.”

¹² Based on my training and experience, as well as publicly available information, I know that a “Kalashnikov” is an AK-47 assault rifle, a “PK” is a machinegun, “RPGs” are rocket-propelled grenades, and “DShK” is a DShK 1938, a heavy Soviet machinegun.

u. On or about January 11, 2025, CS-1 sent the below-depicted itemized list of the DTO's purported weapons order (the "Weapons List") to QADEER:



Item	Quantity
AKM or AK47 (preferred) or AK203 7.62x39mm rifle	150
7.62x39mm ammunition (for AKs)	500000
RPG-7V2 (Rocket Propelled Grenade Launcher)	50
RPG-7VL Self-Propelled Grenades (for RPGs)	250
PKM Medium Machine Gun (preferred) 7.62x54mmR	20
Dragunov Sniper Rifles (SVD) 7.62x54mmR	30
7.62x5mmR Ammunition (for sniper rifles and PKMs)	200000
DShK 12.7mm HMG (Heavy Machine gun) (preferred)	20
Kord 12.7 mm HMG (if possible)	20
12.7mm ammunition (for Kord HMG or DShK HMGs)	100000
RGN hand grenade	500
MP-443 Grach 9mm pistol	50
9mm ammunition	10000

v. On or about January 11, 2025, during a telephone call, CS-1 told QADEER that the DTO planned to equip its ships with the weapons in the Weapons List, and to use those armed ships to transport "the shisha [i.e., methamphetamine] and the heroin they're gonna be ordering from you [QADEER]." QADEER responded that he understood.

w. On or about January 11, 2025, QADEER sent CS-1 a voice recording in which QADEER said, among other things, that QADEER had the Weapons List translated and sent to his Suppliers for a pricing quotation.

x. On or about January 14, 2025, during a telephone call, CS-1 asked QADEER if the weapons could be delivered to Kenya or Tanzania. QADEER replied, "It's not a problem." QADEER further explained that the full weapons delivery could be completed within approximately one week to ten days. CS-1 explained that the weapons were "very important" because the DTO needed to use them for the ships to transport the drugs. QADEER replied, "You will receive, brother. Don't worry."

y. On or about January 16, 2025, QADEER sent CS-1 photographs and prices of various weapons and ammunition, including, among other items: \$11,579 for one sniper rifle; \$9,670 for one Kord machine gun; \$9,120 for one PK machine gun; \$5,769 for one DShK machine

gun; \$3,112 for one AKM assault rifle; \$1,770 for ten grenades in one box; \$1,770 for one RPG; and \$1,089 for one pistol.

z. During a subsequent telephone call on or about January 24, 2025, CS-1 told QADEER that CS-1 was working on organizing the pricing information from QADEER and would share it with the DTO. QADEER expressed frustration at the slow pace of the weapons order and told CS-1, “My word, my things, what I told you, you will receive.” QADEER then cursed at CS-1 and complained that ten days had elapsed and QADEER had not received “one penny.”

aa. On or about February 7, 2025, during a telephone call, CS-1 told QADEER that CS-1 was arranging a meeting between QADEER, CS-1, and the DTO to discuss and finalize, face-to-face, the ongoing projects (*i.e.*, the drug and weapons transactions). QADEER agreed to attend the meeting and later told CS-1 that he would be accompanied by at least one bodyguard.

bb. On or about February 21, 2025, during a telephone call, CS-1 explained that the upcoming meeting between QADEER, CS-1, and the DTO would be a big meeting during which QADEER could finalize the specifics of his deals with the DTO. CS-1 further explained that the DTO was preparing to buy approximately 500 to 600 kilograms of heroin and “shisha” (*i.e.*, methamphetamine) from QADEER to sell in the United States, and QADEER responded affirmatively. CS-1 told QADEER that the weapons in the Weapons List were very important for the DTO because the DTO planned to equip its ships with those weapons, and transport the “commodity” (*i.e.*, the heroin and methamphetamine) the DTO would purchase from QADEER directly to the United States. QADEER replied, “I know.” CS-1 also said that the armed individuals on the DTO’s ships intended to fire at anyone who attempted to disrupt the DTO’s narcotics trafficking, including “U.S. forces.” CS-1 told QADEER to be prepared for the upcoming meeting, and QADEER responded, “I understand what you mean.” In addition, QADEER told CS-1 that QADEER’s Suppliers were prepared to deliver all of the DTO’s requested weapons and ammunition within three days of QADEER providing the Suppliers with the delivery location.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of ABDUL ZAHIR QADEER, a/k/a “Haji Abdul Zahir,” the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

FURTHER, the Government respectfully moves for this Complaint and the associated arrest warrant to remain sealed, with the exception that this Complaint and the arrest warrant be unsealed for the limited purpose of disclosing the existence of or disseminating this Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant’s arrest, extradition, or expulsion as otherwise required for purposes of national security.

Nicholas DiFrancesco (by VF with permission)
NICHOLAS DIFRANCESCO
Special Agent
Drug Enforcement Administration

Sworn to me through the transmission of
this Complaint by reliable electronic means
(telephone), this 25th day of March, 2025.



THE HONORABLE VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK