

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

for the
District of Vermont

2015 JUL 30 AM 8:18

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Apartment 1S, 84 Lincoln Avenue, St Albans, Vermont

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)
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Case No.

CLERK
BY lw
DEPUTY CLERK

2:15mj 110-1

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location): see Attachment A

located in the _____ District of _____ Vermont _____, there is now concealed (identify the person or describe the property to be seized): see Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. sections 841 & 846	distribution of controlled substances, possession with intent to distribute controlled substances, and conspiracy to distribute controlled substances

The application is based on these facts:
see the following application

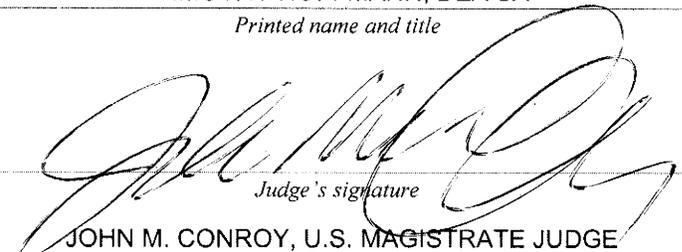
- Continued on the attached sheet.
- Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

TIMOTHY HOFFMANN, DEA SA
Printed name and title

Sworn to before me and signed in my presence.

Date: 07/29/2015


Judge's signature
JOHN M. CONROY, U.S. MAGISTRATE JUDGE
Printed name and title

City and state: BURLINGTON, VERMONT

ATTACHMENT A

PROPERTY TO BE SEARCHED

The Subject Property is described as follows: Apartment 1S, 84 Lincoln Avenue, St. Albans, Vermont. The subject property is located within a white, colonial building, depicted in the photograph below. The number “84” is over the front-center door of the building. The door to apartment 1S is on the left side of this photograph. Immediately to the right of that door



viewed from the exterior) is a mail box bearing “1S.”

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846: conspiracy to distribute controlled substances, including heroin (a schedule I controlled substance) and cocaine base (a schedule II controlled substance), substances suspected to be controlled substances, drug processing and packaging materials, cutting agents, and drug paraphernalia and literature;

2. Any and all documents, records, and items of personal property relating to the purchase and distribution of controlled substances, including the following: telephones and cellular telephones, smart phones (e.g., BlackBerry, Treo, etc.), pagers, answering machines, caller ID boxes, ledgers, account books, receipts, log books, address books, telephone directories, notes, maps, correspondence, customer lists and records, suppliers' lists and records, delivery forms and records, bank and financial records including checks, money orders, mailing receipts, car and mailbox rental records, storage facility rental records, telephone answer pads, records relating to domestic and foreign travel such as tickets, passports visas, and travel schedules, letters, telegrams and telexes;

3. Any and all documents, records and articles of personal property (including safes, duffel backs, and other containers) evidencing the obtaining, secreting, transfer, expenditure, and concealment of contraband, money and assets derived from or to be used in the purchase, and distribution of controlled substances, including: U.S. currency, foreign currency, jewelry, bank

books, bank statements, receipts, warranties, electronics, financial and negotiable instruments, checks, and money orders, records of wire transfers, tax records;

4. Any and all documents, records, and articles of personal property showing the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the Subject Property, including: keys, rental agreements and records; and

5. Any and all passwords necessary to access the data contained within the cellular telephones, smart phones, and other electronic items being seized

6. Any and all ammunition and firearms, including handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons.

Affidavit for Search Warrant

1. I, Timothy Hoffmann, being sworn, depose and state as follows:

2. I am a special agent ("SA") with the Drug Enforcement Administration ("DEA."). I was hired as a SA with DEA in 2012 and completed my training in 2013. I was a police officer for approximately four years in New York State prior to joining DEA. I am assigned to the DEA's Burlington Resident Office (BRO). In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement: I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including several schools regarding general narcotics investigation; I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. In total, I have received approximately 18 weeks of specialized training at the DEA Academy, including in classes regarding the conducting of narcotics investigations (interdiction, identification, smuggling, clandestine manufacture of drugs, methods of packaging, distribution of drugs, undercover operations, the laundering of drug proceeds, asset forfeiture, use of confidential sources, cooperating witnesses, and other sources of information) and the legal aspects of conducting drug investigations. I have also received specialized training related to the investigation of money laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and heroin, the type of drugs

that is being distributed by the target subject under investigation and discussed herein. I have also participated in various aspects of investigatory work, including undercover surveillance and undercover narcotics purchases, and have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants and frequently utilized the services of informants, and other confidential sources of information.

3. I submit this affidavit to establish probable cause in support of a search warrant authorizing the search of apartment 1S, 84 Lincoln Avenue, St. Albans, Vermont, as described on attachment A, for the property described in Attachment B. The information contained within this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

4. On July 29, 2015, this Court issued a search warrant to search a hotel room in Williston Vermont. During the search authorized by that warrant, law enforcement discovered approximately 200 grams of heroin and approximately 200 grams of cocaine base (both substances field-testing positive for heroin and cocaine, respectively). Law enforcement also found

a stack of U.S. currency approximately 2 inches thick (the precise value of which has not been determined to my knowledge at this time).

5. Prior to the execution of that search, persons later identified as Dorsey Hunt and Angela Hoffman, were observed leaving the hotel room. They were arrested. Hunt was determined to be in possession of approximately 50 grams of cocaine base and 16 grams of heroin, among other items. Angela Hoffman was determined to be in possession of approximately 50 bags of heroin and approximately 3 grams of crack cocaine. (The substance seized from Hunt were field tested (positive result) and items seized from Angela Hoffman have not been yet field tested).

6. Both Hunt and Angela Hoffman agreed to speak with police. Hunt was interviewed by principally DEA TFO Merchand and, to a lesser extent, myself. Dorsey Hunt stated that in April 2015 he had been arrested while in possession of approximately 100 grams of crack cocaine that Hunt was bringing to Vermont for a man known to Hunt as "Unc." Hunt stated he felt that he may have been "set up" today because Hunt believed Unc was out of town. Hunt stated he understood that Unc's girlfriend was named Sarah, and that Sarah had rented the room at the hotel from which Hunt had emerged. (I confirmed with hotel personnel that the room was registered to one Sarah Ellwood). Hunt advised that Unc regularly directed Hunt with regard to the delivery of crack cocaine and heroin to different locations in Vermont for those substances to be re-distributed. Hunt also advised that Unc regularly directed Hunt to distribute quantities of these drugs to Angela Hoffman and her husband, John Hoffman for them to re-distribute. Hunt also advised that prior to today, Hunt understood that Unc had temporarily resided in the hotel

unit that was searched. Hunt stated he thought Unc moved around a lot, staying at hotels, and that he changed his phone number frequently. My review of Hunt's criminal record indicates the above-described arrest is the only incident noted.

7. Angela Hoffman was also interviewed principally by DEA TFO Merchand and, to a lesser extent, myself. Angela Hoffman stated that Unc was a source of supply of crack and heroin, that she would distribute, mostly in the St. Albans area. She stated that on average during the previous two weeks, she sold 80 to 120 bags of heroin a day and 10 to 15 bags of crack cocaine daily. For approximately the last month, when she was sold out, she brought sale proceeds to Unc either at a location in the Burlington area, or at a residence she described by physical description and location within St. Albans. Her description of this location is consistent with 84 Lincoln Avenue in St. Albans. She stated that three or four days ago she was resupplied at this Lincoln Avenue location by giving Unc the sale proceeds and receiving new inventory to sell. My review of Angela Hoffman's criminal record indicates she does not have prior convictions.

8. Prior to the arrest of Hunt and Angela Hoffman, earlier today the DEA arrested John Hoffman (Angela's husband). John Hoffman agreed to speak with police, and was interviewed principally by DEA TFO Matthew Cannon. John Hoffman advised TFO Cannon, among other things that for the last 26 days, John Hoffman has been managing distribution at various locations on behalf of Unc. John Hoffman stated he has been "running traps" from 9:30a.m. to midnight each day for Unc. Unc called yesterday at 2pm and directed John Hoffman to go to an address in the Bronx. This

address was a hotel that John Hoffman understood that Sarah Ellwood and Unc (known to John Hoffman as Fernando Ramirez) were utilizing. While in the hotel in the Bronx, John Hoffman stated, he was given a black duffel bag and told to bring it to the hotel room in Williston Vermont that was searched earlier today, and to give the bag to "Jah." Upon his apprehension today, Hunt advised Hunt's nickname was "Jah."

9. John Hoffman stated that he has been to the Lincoln Avenue location where he understood that Sarah Ellwood and Unc stay. John Hoffman stated more specifically that Unc and Ellwood reside at the apartment located at 84 Lincoln Avenue, in St. Albans, on the ground floor, with "1S" on the mailbox. John Hoffman stated that approximately 5 days ago, he went to this location to meet with Unc. While there, he stated, Unc directed John Hoffman to go to the basement of the apartment to retrieve two separate "bricks," one of heroin and one of crack cocaine. John Hoffman stated he observed Unc break off a quantity from each brick, for redistribution. John Hoffman also advised TFO Cannon that he had observed within the Lincoln Avenue apartment an assault-style rifle and more than one handgun. John Hoffman also advised that he had observed that Unc has a safe in the bedroom, and additional locations in other places within the apartment where Unc maintains stashes of drugs. John Hoffman's criminal history includes misdemeanor convictions for: unlawful trespass (2002), vehicle operation-license suspended #1 for DUI (2006), depressant/stimulant/narcotic-possession <100x dose (2007), vehicle operation-careless or negligent (2007), vehicle operation-license suspended #2 (2007), petit larceny (2012), assault-simple (2012), and vehicle operation-license suspended/OSC (2014).

10. A review of law enforcement data bases indicates that on January 24, 2015 police responded to a disturbance at 84 Lincoln Avenue, in St. Albans. According to the St. Albans police report, a neighbor advised police that Sarah Ellwood and her boyfriend were in a disturbance at that location.

11. In addition, last week [REDACTED] who is a defendant in case no. [REDACTED] in this Court was interviewed [REDACTED] by a member of the Vermont State Drug Task Force, with whom I have spoken. [REDACTED] stated that at the time of the incident giving rise to [REDACTED] prosecution for conspiracy to distribute cocaine base in [REDACTED] 2015, [REDACTED] was working with Unc. When asked where Unc lived [REDACTED] indicated the neighborhood in St. Albans, that includes 84 Lincoln Avenue. I do not know the details of [REDACTED]'s criminal history, but I am aware that [REDACTED] is a heroin addict who has been involved in the trafficking of narcotics and firearms. I understand [REDACTED] has recently been prosecuted by the State of Vermont, but I do not know the details of those prosecutions.

12. DEA TFO Sylvia has been conducting surveillance of the 84 Lincoln Avenue building today. He has observed a jeep parked in the vicinity of this building that he has confirmed is registered to Sarah Ellwood. This is the same vehicle from which the Vermont State Police discovered approximately 600 bags of heroin following a traffic stop in February 2015. Ellwood was not present in the vehicle at the time of the stop. Today Hunt advised TFO Merchand that Hunt was aware of this incident and that one of the men arrested in connection with this incident was named Moe and Moe worked for Unc. I have reviewed the state police report of this incident and

have confirmed that one of occupants of this vehicle was Maurice Nix, who was arrested at the time.

13. TFO Sylvia today also spoke with the landlord of the 84 Lincoln Avenue building. The landlord advised TFO Sylvia that "Sarah" rents apartment 1S within that building, and that Sarah's boyfriend's name is Fernando.

14. Based on my training, experience, and participation in other controlled substances investigations, I know the following:

- A. Both small and large scale drug traffickers often maintain, on hand, large amounts of U.S. Currency in order to finance their ongoing drug business;
- B. Controlled substance traffickers commonly maintain books, records, receipts, notes, ledgers, electronic/digital data, common carrier tickets, money orders, and other documents relating to the transportation, acquisition and distribution of controlled substances;
- C. Controlled substance traffickers commonly provide controlled substances on consignment to their clients;
- D. The aforementioned books, records, receipts, notes, ledgers, etc. are commonly maintained where controlled substance traffickers can have ready access to them;
- E. It is common for both small and large scale drug traffickers to secret contraband, proceeds of drug sales, and records of transactions in secure locations within their residence and/or other residences, either vacant or

occupied by other members of the trafficking conspiracy (stash houses), and/or their businesses, to conceal them from law enforcement authorities;

- F. Persons involved in both small and large scale drug trafficking commonly conceal in their residences, stash houses and businesses caches of drugs, large amounts of currency, financial instruments (including stocks, bonds, certificates of deposit, etc.), precious metals, jewelry, automobile titles, other items of value and/or proceeds of drug transactions and evidence of financial transactions relating to the attainment and concealment of large sums of money acquired from engaging in narcotic trafficking activities;
- G. When drug traffickers amass proceeds from the sale of drugs, the drug traffickers commonly attempt to legitimize these profits, i.e. "launder" the profits; to accomplish these goals, drug traffickers many times utilize domestic and foreign banks and/or financial institutions with their attendant services, including sales of securities, cashiers checks, money drafts, letters of credit, etc.; that other entities used to "launder" monies include brokerage houses, real estate firms, shell corporation and purported legitimate business fronts;
- H. It is common practice for both small and large scale narcotic traffickers to travel to distribution areas to purchase and otherwise facilitate their trafficking; that after purchasing controlled substances, the traffickers

will transport or cause to be transported narcotics to areas in which they will distribute them; and that the methods of transportation include, but are not limited to trains, commercial airlines, ocean-going vessels, private airplanes, rental and private automobiles, and government and contract mail carriers;

- I. Narcotics traffickers commonly maintain address or telephone numbers in books, documents and electronic/digital devices/media that relate names, addresses and/or telephone numbers of their associates in the trafficking organization;
- J. Drug traffickers take or cause to be taken photographs of themselves, their associates, their property and their product, and that the photographs are usually maintained at the residence and/or businesses of the traffickers;
- K. The courts have recognized that the unexplained wealth is probative evidence of crimes motivated by greed, in particular trafficking in controlled substances; and
- L. Drug traffickers commonly have in their possession (that is on their persons, in their vehicles, and at their residences and/or their businesses), ammunition and firearms, including but not limited to handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons; that said ammunition and firearms are used to protect and secure a drug trafficker's property.

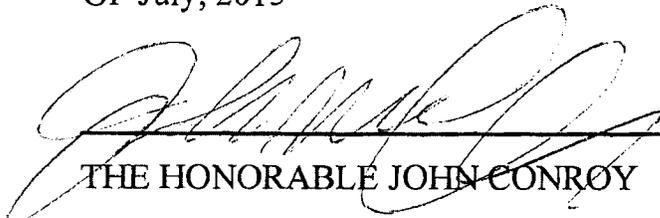
CONCLUSION

For the reasons outlined above, I believe there is probable cause to believe that Apartment 1S, 84 Lincoln Avenue, St. Albans, Vermont, described further in Attachment A, contains evidence, instrumentalities, and fruits of crimes as described further in Attachment B.



Timothy Hoffmann, Special Agent
U.S. Drug Enforcement Administration

SUBSCRIBED TO AND SWORN TO
BEFORE ME THIS 29th DAY
OF July, 2015



THE HONORABLE JOHN CONROY
UNITED STATES MAGISTRATE JUDGE

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
District of Vermont

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Apartment 1S, 84 Lincoln Avenue, St Albans, Vermont

Case No. 2:15mj110

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the District of Vermont
(Identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (Identify the person or describe the property to be seized):

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before August 10, 2015 (not to exceed 14 days)
in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to U.S. Mag. Judge John M. Conroy
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

for 30 days (not to exceed 30) until, the facts justifying, the later specific date of

Date and time issued: July 29, 2015
9:35 p.m.
City and state: Burlington, Vermont

Handwritten signature of John M. Conroy
Printed name and title: JOHN M. CONROY
U.S. Magistrate Judge

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return		
Case No.: 2:15mj110	Date and time warrant executed: 07/29/2015 @ 2155hrs	Copy of warrant and inventory left with: 84 Lincoln Ave, ST Albans
Inventory made in the presence of: No one present		
Inventory of the property taken and name of any person(s) seized: LG phone (3), digital scale, miscellaneous documents, Hawaiian Punch can containing two (2) keys, miscellaneous documents, green leafy substance, .45 cal pistol (Taurus), pistol magazine, shoebox containing glassine envelopes, blue duffle bag, ammunition, LG Phone, container with false compartment, Kyocera phone, HTC phone, photographs, two (2) Samsung flip phones, Sim card, Iphone, Hotel records, pills in a glassine envelope, 2015 Nissan Altima (VT GMS655).		
Certification		
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.		
Date: <u>7/29/2015</u>	 _____ <i>Executing officer's signature</i>	
	<u>Timothy Hoffmann, Special Agent</u> _____ <i>Printed name and title</i>	

ATTACHMENT A

PROPERTY TO BE SEARCHED

The Subject Property is described as follows: Apartment 1S, 84 Lincoln Avenue, St. Albans, Vermont. The subject property is located within a white, colonial building, depicted in the photograph below. The number "84" is over the front-center door of the building. The door to apartment 1S is on the left side of this photograph. Immediately to the right of that door



viewed from the exterior) is a mail box bearing "1S."

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846: conspiracy to distribute controlled substances, including heroin (a schedule I controlled substance) and cocaine base (a schedule II controlled substance), substances suspected to be controlled substances, drug processing and packaging materials, cutting agents, and drug paraphernalia and literature;

2. Any and all documents, records, and items of personal property relating to the purchase and distribution of controlled substances, including the following: telephones and cellular telephones, smart phones (e.g., BlackBerry, Treo, etc.), pagers, answering machines, caller ID boxes, ledgers, account books, receipts, log books, address books, telephone directories, notes, maps, correspondence, customer lists and records, suppliers' lists and records, delivery forms and records, bank and financial records including checks, money orders, mailing receipts, car and mailbox rental records, storage facility rental records, telephone answer pads, records relating to domestic and foreign travel such as tickets, passports visas, and travel schedules, letters, telegrams and telexes;

3. Any and all documents, records and articles of personal property (including safes, duffel backs, and other containers) evidencing the obtaining, secreting, transfer, expenditure, and concealment of contraband, money and assets derived from or to be used in the purchase, and distribution of controlled substances, including: U.S. currency, foreign currency, jewelry, bank

books, bank statements, receipts, warranties, electronics, financial and negotiable instruments, checks, and money orders, records of wire transfers, tax records;

4. Any and all documents, records, and articles of personal property showing the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the Subject Property, including: keys, rental agreements and records; and

5. Any and all passwords necessary to access the data contained within the cellular telephones, smart phones, and other electronic items being seized

6. Any and all ammunition and firearms, including handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons.

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

for the
District of Vermont

2015 JUL 29 PM 4:51

In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*

UNIT 222 AT THE SONESTA SUITES, LOCATED AT 35
HURRICANE LANE, WILLISTON, VERMONT

Case No.

CLERK
BY 
DEPUTY CLERK

2:15mj109-1

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:
see Attachment A

located in the _____ District of _____ Vermont _____, there is now concealed *(identify the person or describe the property to be seized)*:
see Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. sections 841 & 846	distribution of controlled substances, possession with intent to distribute controlled substances, and conspiracy to distribute controlled substances

The application is based on these facts:
see the following application

Continued on the attached sheet.

~~Delayed~~ Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



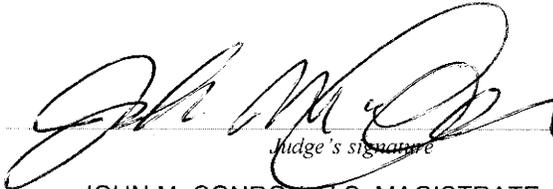
Applicant's signature

TIMOTHY HOFFMANN, DEA SA

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/29/2015



Judge's signature

JOHN M. CONROY, U.S. MAGISTRATE JUDGE

Printed name and title

City and state: BURLINGTON, VERMONT

ATTACHMENT A

PROPERTY TO BE SEARCHED

The Subject Property is described as follows: Unit 222 of the Sonesta Suites, located at 35 Hurricane Lane Williston, Vermont, registered to Sarah Ellwood. The Sonesta Suites is a commercial hotel with multiple units and multiple buildings that is located in Williston, Vermont. Unit 222 is located within building #2 on the north side of the establishment. Building #2 is identified by the number "2" (maroon in color) located on a chimney stack approximately in the middle of the north side of the building. Unit 222 has the number "222" on a white sign in black numbers located immediately to the right of the door to the unit, as one looks at that door from the exterior. This door is maroon in color and is located on second floor.

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846: conspiracy to distribute controlled substances, including heroin and cocaine base, which ^{AND} ~~is a~~ Schedule I ^{AND SCHEDULE II} controlled substance, substances suspected to be controlled substances, drug processing and packaging materials, cutting agents, and drug paraphernalia and literature;
2. Any and all documents, records, and items of personal property relating to the purchase and distribution of controlled substances, including the following: telephones and cellular telephones, smart phones (e.g., BlackBerry, Treo, etc.), pagers, answering machines, caller ID boxes, ledgers, account books, receipts, log books, address books, telephone directories, notes, maps, correspondence, customer lists and records, suppliers' lists and records, delivery forms and records, bank and financial records including checks, money orders, mailing receipts, car and mailbox rental records, storage facility rental records, telephone answer pads, records relating to domestic and foreign travel such as tickets, passports visas, and travel schedules, letters, telegrams and telexes;
3. Any and all documents, records and articles of personal property (including safes, duffel backs, and other containers) evidencing the obtaining, secreting, transfer, expenditure, and concealment of contraband, money and assets derived from or to be used in the purchase, and distribution of controlled substances, including: U.S. currency, foreign currency, jewelry, bank

books, bank statements, receipts, warranties, electronics, financial and negotiable instruments, checks, and money orders, records of wire transfers, tax records;

4. Any and all documents, records, and articles of personal property showing the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the Subject Property, including: keys, rental agreements and records; and

5. Any and all passwords necessary to access the data contained within the cellular telephones, smart phones, and other electronic items being seized

6. Any and all ammunition and firearms, including handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons.

Affidavit for Search Warrant

1. I, Timothy Hoffmann, being sworn, depose and state as follows:

2. I am a special agent (“SA”) with the Drug Enforcement Administration (“DEA.”). I was hired as a SA with DEA in 2012 and completed my training in 2013. I was a police officer for approximately four years in New York State prior to joining DEA. I am assigned to the DEA's Burlington Resident Office (BRO). In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement: I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including several schools regarding general narcotics investigation; I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. In total, I have received approximately 18 weeks of specialized training at the DEA Academy, including in classes regarding the conducting of narcotics investigations (interdiction, identification, smuggling, clandestine manufacture of drugs, methods of packaging, distribution of drugs, undercover operations, the laundering of drug proceeds, asset forfeiture, use of confidential sources, cooperating witnesses, and other sources of information) and the legal aspects of conducting drug investigations. I have also received specialized training related to the investigation of money laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and heroin, the type of drugs that is being distributed by the target subject under investigation and discussed herein. I have also participated in various aspects of investigatory

work, including undercover surveillance and undercover narcotics purchases, and have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants and frequently utilized the services of informants, and other confidential sources of information.

3. I submit this affidavit to establish probable cause in support of a search warrant authorizing the search of Unit 222 at the Sonesta Suites, located at 35 Hurricane Lane, Williston Vermont, as described on attachment A, for the property described in Attachment B. The information contained within this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

4. This morning a source of information advised DEA SA Brandon Hope that the source of information had heard that John Hoffman, a person known to myself and other DEA agents, would be making a trip to the New York City area in order to pick up drugs and return to Vermont for distribution of those drugs. This source of information's criminal history includes a conviction for driving while intoxicated.

5. Separately, another source of information (“CI”) had previously told me that he or she could acquire heroin from John Hoffman. I am unaware of any connection between the source of information referred to in paragraph 4, and the CI.¹

¹ The following is a summary of the CI’s criminal conviction history.

- CI was arrested and subsequently convicted in 2014 for petit larceny of under \$900 (misdemeanor) and placed on probation.
- CI was arrested in 2013 for careless or negligent vehicle operation and for leaving the scene of a crash. CI was subsequently convicted of leaving the scene of a crash (misdemeanor) and was placed on probation. CI was arrested that same year for leaving the scene of a crash with property damage, careless or negligent vehicle operation, and for driving under the influence of alcohol and was convicted of leaving the scene of the crash and placed on probation.
- CI also has prior convictions for drug possession; in 2014, s/he was convicted of possessing less than 2.5 grams of cocaine (misdemeanor) and was placed on probation.
- In 2010, CI was charged with misdemeanor possession of controlled substances, less than 100 doses. The disposition of this charge is unknown.
- In 2008, CI was convicted of possessing and/or selling less than 100 doses of a depressant/stimulant/narcotic (felony), and buying, receiving, or selling stolen property and sentenced to 1 to 3 years of incarceration.
- In 2008, CI was convicted of misdemeanor vehicle operation-careless or negligent and incarcerated for 0-1 years concurrent.
- In 2007, CI was charged with Vehicle Operation-license suspended. The disposition of this charge is unknown.
- CI was arrested and/or convicted in 2006 for leaving the scene of a crash and for vehicle operation with a suspended license and was sentenced to probation.
- In 2005, CI was convicted of Grand Larceny and sentenced to incarceration for 18 months to one year, all suspended with probation except 30 days.
- CI was arrested by the Burlington Police Department in 2003 for false pretenses. This charge was amended to petit larceny for which s/he was convicted in 2004. In 2006, CI violated probation and was incarcerated for 4-12 months.

6. Based upon this intelligence, DEA set up surveillance at a location in Chittenden County where it believed it could encounter John Hoffman. At approximately 9:40 a.m. this morning DEA agents, including myself, observed John Hoffman within a vehicle at this location. DEA agents, including myself, approached the vehicle, and I observed what appeared to be a small quantity of crack cocaine on the center console. John Hoffman was detained and, upon questioning, he admitted that he had returned earlier this morning from New York City with a package. He stated that he picked this package up from a residence in New York City. While within the New York City residence, he stated he observed heroin and crack cocaine. Hoffman denied knowing the contents of the package, but also stated words to the effect of he is not stupid and that he understood the package probably contained drugs. This Hoffman was transferred to Winooski Police Department pending further proceedings.
7. Hoffman stated he delivered the package to Unit 222 at what he referred to as the Residence Inn, and described the location in Williston, Vermont. He indicated he had delivered the package to a person he knew as "Jah." I know that the establishment Hoffman described has recently changed its name from the Residence Inn and is now known as the Sonesta Suites, and is located at 35 Hurricane Lane, Williston, Vermont.
8. I inquired with the hotel regarding the current renters of Unit 222. The hotel has advised that the unit is registered to a Sarah Ellwood. The hotel states it does not have an address for Sarah Ellwood, and that it did not request identification upon her check in.

9. I know based on review of records that in February, 2015, a Vermont State Police Trooper discovered approximately 600 bags of heroin (field test positive) within a vehicle that had been pulled over for a traffic violation. The registered owner of that vehicle was one Sarah Ellwood. Ellwood was not present during the traffic stop.

10. At approximately 10:45 a.m., while DEA continued its surveillance a woman arrived in a vehicle registered to John Hoffman. Winooski Police confirmed with John Hoffman that the woman driving his vehicle would be his wife, Angela Hoffman. While DEA agents watched, Mrs. Hoffman knocked on the door to Unit 222 and was admitted. Approximately ten minutes later, Mrs. Hoffman and a man were observed leaving Unit 222 and headed to the Hoffman vehicle. The man was carrying a backpack.²

11. DEA Agents approached the man and Mrs. Hoffman as they were about to get into the Hoffman car. For officer safety, DEA announced themselves ordered target and Mrs. Hoffman to put their hands in the air and to get on

² The backpack has been searched by law enforcement. In light of the circumstances surrounding its search, and having consulted with the United States Attorney's Office, I request that the Court not consider the contents of the backpack as supporting the issuance of the warrant I am requesting, but rather with an eye to what the contents of the backpack may suggest is no longer within Unit 222. The backpack appears to have contained: 52 grams of suspected crack cocaine, 20 knotted baggies (.02 grams each) of suspect crack cocaine, approximately 16 grams of heroin (bulk), approximately 50 bags of suspected heroin, 4 small bags of suspect cocaine, 14 individual knotted baggies which may contain the drug known as "Molly," as well as an apparent drug ledger.

the ground. Both parties complied. The man and Mrs. Hoffman were placed in handcuffs. The man identified himself as "Jah."

12. DEA asked Mrs. Hoffman for consent to search her pocketbook which she provided. DEA SA Chetwynd located approximately 50 bags of what I recognize to be heroin in her purse as well as a quantity of what I recognize to be crack cocaine, as well as what appears to be a ledger describing drug transactions and debts. Mrs. Hoffman also admitted to police that she came to Unit 222 in order to acquire narcotics for redistribution.
13. The man accompanying Mrs. Hoffman has been identified as Dorsey Hunt. A review of law enforcement databases indicates he has a criminal history that includes an April 2015 arrest in or near Northampton, Massachusetts, pursuant to which he was charged with Trafficking in Cocaine, and Possess to Distribute Cocaine. I am unable to discern whether these charges have been resolved.
14. Following the apprehension of Mrs. Hoffman and Mr. Hunt, DEA officers conducted a security sweep of Unit 222 to ensure there were no hidden individuals or weapons which could pose a threat to officer safety. During the sweep of the unit, I observed what appeared to be a locked duffle bag in plain view. The warrant requested herein would permit the search of this bag.
15. Based on my training, experience, and participation in other controlled substances investigations, I know the following:

- A. Both small and large scale drug traffickers often maintain, on hand, large amounts of U.S. Currency in order to finance their ongoing drug business;
- B. Controlled substance traffickers commonly maintain books, records, receipts, notes, ledgers, electronic/digital data, common carrier tickets, money orders, and other documents relating to the transportation, acquisition and distribution of controlled substances;
- C. Controlled substance traffickers commonly provide controlled substances on consignment to their clients;
- D. The aforementioned books, records, receipts, notes, ledgers, etc. are commonly maintained where controlled substance traffickers can have ready access to them;
- E. It is common for both small and large scale drug traffickers to secret contraband, proceeds of drug sales, and records of transactions in secure locations within their residence and/or other residences, either vacant or occupied by other members of the trafficking conspiracy (stash houses), and/or their businesses, to conceal them from law enforcement authorities;
- F. Persons involved in both small and large scale drug trafficking commonly conceal in their residences, stash houses and businesses caches of drugs, large amounts of currency, financial instruments (including stocks, bonds, certificates of deposit, etc.), precious metals, jewelry, automobile titles, other items of value and/or proceeds of drug transactions and evidence of financial transactions

relating to the attainment and concealment of large sums of money acquired from engaging in narcotic trafficking activities;

- G. When drug traffickers amass proceeds from the sale of drugs, the drug traffickers commonly attempt to legitimize these profits, i.e. "launder" the profits; to accomplish these goals, drug traffickers many times utilize domestic and foreign banks and/or financial institutions with their attendant services, including sales of securities, cashiers checks, money drafts, letters of credit, etc.; that other entities used to "launder" monies include brokerage houses, real estate firms, shell corporation and purported legitimate business fronts;
- H. It is common practice for both small and large scale narcotic traffickers to travel to distribution areas to purchase and otherwise facilitate their trafficking; that after purchasing controlled substances, the traffickers will transport or cause to be transported narcotics to areas in which they will distribute them; and that the methods of transportation include, but are not limited to trains, commercial airlines, ocean-going vessels, private airplanes, rental and private automobiles, and government and contract mail carriers;
- I. Narcotics traffickers commonly maintain address or telephone numbers in books, documents and electronic/digital devices/media that relate names,

addresses and/or telephone numbers of their associates in the trafficking organization;

- J. Drug traffickers take or cause to be taken photographs of themselves, their associates, their property and their product, and that the photographs are usually maintained at the residence and/or businesses of the traffickers;
- K. The courts have recognized that the unexplained wealth is probative evidence of crimes motivated by greed, in particular trafficking in controlled substances; and
- L. Drug traffickers commonly have in their possession (that is on their persons, in their vehicles, and at their residences and/or their businesses), ammunition and firearms, including but not limited to handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons; that said ammunition and firearms are used to protect and secure a drug trafficker's property.

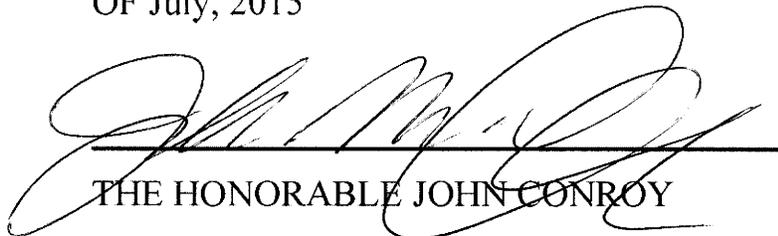
CONCLUSION

For the reasons outlined above, I believe there is probable cause to believe that Unit 222 of the Sonesta Suites, 35 Hurricane Lane, Williston, Vermont, described further in Attachment A, contains evidence, instrumentalities, and fruits of crimes as described further in Attachment B.



Timothy Hoffmann, Special Agent
U.S. Drug Enforcement Administration

SUBSCRIBED TO AND SWORN TO
BEFORE ME THIS 20th DAY
OF July, 2015



THE HONORABLE JOHN CONROY
UNITED STATES MAGISTRATE JUDGE

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
District of Vermont

In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*

Case No. **2:15mj109**

UNIT 222 AT THE SONESTA SUITES,
LOCATED AT 35 HURRICANE LANE, WILLISTON, VERMONT

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the _____ District of _____ Vermont
(identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal *(identify the person or describe the property to be seized):*

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before August 10, 2015 *(not to exceed 14 days)*

in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

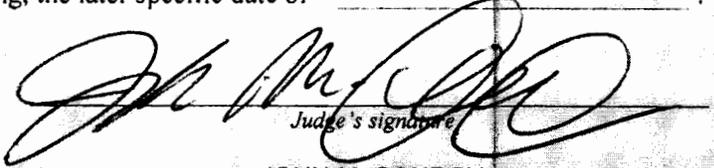
Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to U.S. Mag. Judge John M. Conroy
(United States Magistrate Judge)

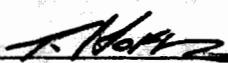
Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*

for ~~30~~ days *(not to exceed 30)* until, the facts justifying, the later specific date of _____

Date and time issued: July 29, 2015
4:57 p.m.
City and state: Burlington, Vermont


Judge's signature
JOHN M. CONROY
Printed name and title
U.S. Magistrate Judge

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return		
Case No.: 2:15mj109	Date and time warrant executed: 07/29/2015 at 1705hrs	Copy of warrant and inventory left with: Room 222 Sonesta Suites
Inventory made in the presence of: No one present		
Inventory of the property taken and name of any person(s) seized: 1 pair of sunglasses, 1 Sons of Anarchy Sweatshirt, PacSun bag containing a Cuisinart Grinder/blender, Pan, Blue Iphone, Gift Certificate, empty plastic bags and blue glassine envelopes, Verizon wireless boxes, receipts, plastic baggies, two brown boxes containing empty blue glassine envelopes, 4 playing cards, silver knife, small backpack containing unknown brown substance, brown powdery substance, white chunky substance, black duffle bag, 2 boxes of heat sealed bags, black bag containing green leafy substance, metal strainer, digital scale, 9 brown boxes containing blue glassine envelopes, \$7,055.00 U.S. Currency		
Certification		
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.		
Date: 7/29/2015	 Executing officer's signature	
	Timothy Hoffmann, Special Agent Printed name and title	

ATTACHMENT A

PROPERTY TO BE SEARCHED

The Subject Property is described as follows: Unit 222 of the Sonesta Suites, located at 35 Hurricane Lane Williston, Vermont, registered to Sarah Ellwood. The Sonesta Suites is a commercial hotel with multiple units and multiple buildings that is located in Williston, Vermont. Unit 222 is located within building #2 on the north side of the establishment. Building #2 is identified by the number "2" (maroon in color) located on a chimney stack approximately in the middle of the north side of the building. Unit 222 has the number "222" on a white sign in black numbers located immediately to the right of the door to the unit, as one looks at that door from the exterior. This door is maroon in color and is located on second floor.

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846: conspiracy to distribute controlled substances, including heroin and cocaine base, which ^{and} is a Schedule I ^{AND SCHEDULE II} controlled substance, substances suspected to be controlled substances, drug processing and packaging materials, cutting agents, and drug paraphernalia and literature;
2. Any and all documents, records, and items of personal property relating to the purchase and distribution of controlled substances, including the following: telephones and cellular telephones, smart phones (e.g., BlackBerry, Treo, etc.), pagers, answering machines, caller ID boxes, ledgers, account books, receipts, log books, address books, telephone directories, notes, maps, correspondence, customer lists and records, suppliers' lists and records, delivery forms and records, bank and financial records including checks, money orders, mailing receipts, car and mailbox rental records, storage facility rental records, telephone answer pads, records relating to domestic and foreign travel such as tickets, passports visas, and travel schedules, letters, telegrams and telexes;
3. Any and all documents, records and articles of personal property (including safes, duffel backs, and other containers) evidencing the obtaining, secreting, transfer, expenditure, and concealment of contraband, money and assets derived from or to be used in the purchase, and distribution of controlled substances, including: U.S. currency, foreign currency, jewelry, bank

books, bank statements, receipts, warranties, electronics, financial and negotiable instruments, checks, and money orders, records of wire transfers, tax records;

4. Any and all documents, records, and articles of personal property showing the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the Subject Property, including: keys, rental agreements and records; and

5. Any and all passwords necessary to access the data contained within the cellular telephones, smart phones, and other electronic items being seized

6. Any and all ammunition and firearms, including handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:15-MJ-109
)	
ANGELA HOFFMAN,)	
Defendant.)	

MOTION FOR DETENTION

The United States of America, through its Attorney, Eric Miller, United States Attorney for the District of Vermont, moves for pretrial detention of defendant Angela Hoffman pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. The defendant is eligible for detention because she is charged with an offense involving controlled substances carrying more than a ten-year sentence.

2. Reason For Detention. The Court should detain the defendant because at this time there are no conditions of release which will reasonably assure the safety of the community.

3. Rebuttable Presumption. At this time, the United States does not intend to invoke the rebuttable presumption against the defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing after a continuance of at least one day. *See* 18 U.S.C. § 3142(f).

5. Other Matters.

Several factors weigh in favor of detention. *See generally* 18 U.S.C. § 3142(g). As explained in the Complaint Affidavit, both the nature and circumstances of the offense charged, § 3142(g)(1), as well as the weight of the evidence, § 3142(g)(2), indicate the appropriateness of pre-trial detention. This matter involves a conspiracy to distribute heroin and crack cocaine.

The evidence includes not only the discovery of those drugs within Hoffman's possession, but also Hoffman's admissions relating to her involvement in a distribution conspiracy.

Hoffman's history and characteristics, § 3142(g)(3), also indicate dangerousness. Law enforcement understands she has a serious substance abuse problem. If that problem is not treated, she can be expected to violate the standard conditions of abstinence and lawfulness and continue to present a danger to herself and others.

For these reasons, there appear to be no set of conditions that would reasonably assure the safety of the community if she were released. She should therefore be detained prior to trial.

Dated at Burlington, in the District of Vermont, this 30th day of July, 2015.

Respectfully submitted,

UNITED STATES OF AMERICA
ERIC MILLER
United States Attorney

By: /s/ Michael P. Drescher
MICHAEL P. DRESCHER
Assistant U.S. Attorney
U.S. Attorney's Office
11 Elmwood Ave., PO Box 570
Burlington, VT 05401
michael.drescher@usdoj.gov

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system on July 30, 2015, and the CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF parties:

Counsel for the Defendant

Dated at Burlington, in the District of Vermont, July 30, 2015.

/s/ Michael P. Drescher
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Michael.Drescher@usdoj.gov

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT

for the
District of Vermont

2015 JUL 30 PM 2: 05

United States of America)
v.)
Dorsey Hunt)
John Hoffman)
Angela Hoffman)
)
)
)
)
)
)

Case No. 2:15-mj-109-1,2,3
BY  DEPUTY CLERK

Defendant(s)

CRIMINAL COMPLAINT

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

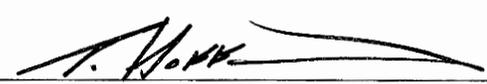
On or about the date(s) of July 2015 in the county of Chittenden in the
District of Vermont, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. section 846	knowingly and willfully conspiring to distribute heroin, a schedule I controlled substance, and cocaine base, a schedule II controlled substance.

This criminal complaint is based on these facts:

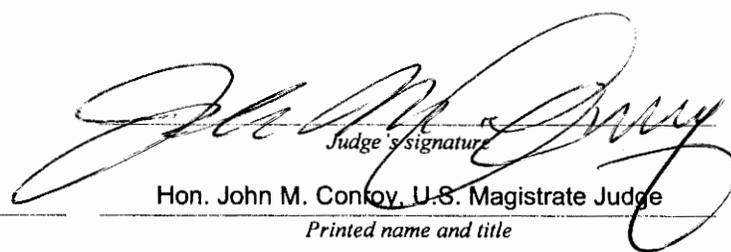
See attached Affidavit.

Continued on the attached sheet.


Complainant's signature
DEA SA TIMOTHY HOFFMANN
Printed name and title

Sworn to before me and signed in my presence.

Date: July 30, 2015
City and state: Burlington, Vermont


Judge's signature
Hon. John M. Conroy, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Timothy Hoffmann, being duly sworn, depose and state as follows:

1. I am Special Agent (SA) with the Drug Enforcement Administration (DEA) and a law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code. I am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.
2. I was hired as a SA with DEA in 2012 and completed my training in 2013. I was a police officer for approximately four years in New York State prior to joining DEA. I am assigned to the DEA's Burlington Resident Office (BRO). In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement: I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including several schools regarding general narcotics investigation; I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. In total, I have received approximately 18 weeks of specialized training at the DEA Academy, including in classes regarding the conducting of narcotics investigations (interdiction, identification, smuggling, clandestine manufacture of drugs, methods of packaging, distribution of drugs, undercover operations, the laundering of drug proceeds, asset forfeiture, use of confidential sources, cooperating witnesses, and other sources of information) and the legal aspects of conducting drug investigations. I have also received specialized training related to the investigation of money

laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and heroin, the type of drugs that is being distributed by the target subject under investigation and discussed herein. I have also participated in various aspects of investigatory work, including undercover surveillance and undercover narcotics purchases, and have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants and frequently utilized the services of informants, and other confidential sources of information.

3. I submit this affidavit to establish probable cause to believe that in or around July 2015, DORSEY HUNT, JOHN HOFFMAN, and ANGELA HOFFMAN knowingly and willfully conspired with each other, and others, to distribute heroin, a schedule I controlled substance, and cocaine base (also known as crack cocaine), a schedule II controlled substance, in violation of 21 U.S.C. § 846.
4. The information contained within this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each

and every fact known to me concerning this investigation. I have set forth only those facts which I believe are necessary to establish probable cause to believe that the defendants committed the offenses described above.

5. On July 29, 2015, this Court issued a search warrant to search a hotel room in Williston Vermont (the Hotel Room). During the search authorized by that warrant, law enforcement discovered approximately 200 grams of heroin and approximately 200 grams of cocaine base (both substances field-tested positive for heroin and cocaine, respectively). Law enforcement also found a stack of U.S. currency approximately 2 inches thick (the precise value of which has not been determined to my knowledge at this time).

6. Prior to the execution of that search, persons later identified as HUNT and ANGELA HOFFMAN, were observed by DEA agents leaving the Hotel Room. Based on surveillance of the Hotel Room, we know that no other non-law enforcement personnel entered or exited the Hotel Room before the execution of the search after HUNT and ANGELA HOFFMAN were seen leaving the room. HUNT and ANGELA HOFFMAN were detained, and arrested. ANGELA HOFFMAN was determined to be in possession of approximately several bags of heroin. The heroin was recently examined that there appear to be approximately 90 bags found within ANGELA HOFFMAN's purse. Subsequent examination of the crack cocaine found within her purse reveals that she possessed approximately 20 bags of crack cocaine, weighing approximately 7 grams (including the weight of the bags). A sample of both the heroin and crack were field tested with positive results for heroin and cocaine, respectively.

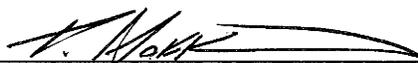
7. Both HUNT and ANGELA HOFFMAN agreed to speak with police. They were interviewed separately. HUNT stated, among other things, that recently HUNT distributed heroin and crack cocaine in and around Chittenden County Vermont and that HUNT distributed quantities of these drugs to ANGELA HOFFMAN and JOHN HOFFMAN, for them to re-distribute. Before the Hotel Room was searched, HUNT also stated that police would find within the Hotel Room the approximate quantity of heroin and crack cocaine that was found in the Hotel Room.

8. ANGELA HOFFMAN stated that during the previous two weeks, she sold on average 80 to 120 bags of heroin a day and 10 to 15 bags of crack cocaine daily. She stated that she had obtained heroin and crack for redistribution from the Williston Hotel Room prior to her arrest.

9. Prior to the arrest of HUNT and ANGELA HOFFMAN, the DEA arrested JOHN HOFFMAN (Angela's husband). JOHN HOFFMAN agreed to speak with police. JOHN HOFFMAN advised that for most of the last month, JOHN HOFFMAN has been distributing heroin and crack cocaine at various locations in Northwestern Vermont on behalf of one or more other persons. JOHN HOFFMAN stated that yesterday he was directed by one of his sources of supply to travel to a location in the Bronx, to retrieve a package. JOHN HOFFMAN stated that while he was at the Bronx location, the source of supply gave HOFFMAN a black duffel bag and told HOFFMAN to bring it to the Hotel Room in Williston, Vermont that was later determined to contain approximately 200 grams of heroin and 200 grams of crack cocaine.

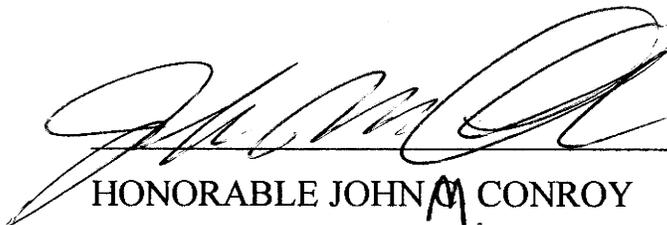
JOHN HOFFMAN stated he did not know for sure but believed the package he delivered contained drugs. He was directed to give the bag to "Jah." Upon HUNT's apprehension, HUNT advised HUNT's nickname was "Jah."

Dated at Burlington, in the District of Vermont on this 30th day of July, 2015.



Timothy J. Hoffmann
Special Agent, DEA

Sworn to and subscribed before me this 30th day of July, 2015.



HONORABLE JOHN M. CONROY
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:15-MJ-109
)	
DORSEY HUNT,)	
Defendant.)	

MOTION FOR DETENTION

The United States of America, through its Attorney, Eric Miller, United States Attorney for the District of Vermont, moves for pretrial detention of defendant Dorsey Hunt pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. The defendant is eligible for detention because he is charged with an offense involving controlled substances carrying more than a ten-year sentence.

2. Reason For Detention. The Court should detain the defendant because at this time there are no conditions of release which will reasonably assure the safety of the community and the defendant’s continued appearance.

3. Rebuttable Presumption. At this time, the United States does not intend to invoke the rebuttable presumption against the defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing after a continuance of at least one day. *See* 18 U.S.C. § 3142(f).

5. Other Matters.

Several factors weigh in favor of detention. *See generally* 18 U.S.C. § 3142(g). As explained in the Complaint Affidavit, both the nature and circumstances of the offense charged, § 3142(g)(1), as well as the weight of the evidence, § 3142(g)(2), indicate the appropriateness of

pre-trial detention. This matter involves very large quantities of drugs that could trigger a five and/or ten year mandatory minimum sentences upon conviction. The evidence includes not only the discovery of those drugs, but also Hunt's admissions relating to his involvement in a distribution conspiracy.

Hunt's history and characteristics, § 3142(g)(3), also indicate dangerousness. He is currently released on bond from an arrest earlier this year in Massachusetts pursuant to which he is charged with two drug felonies. While facing the prospect of that criminal prosecution, Hunt has been found in Vermont supplying crack and heroin for redistribution and in apparent command of a hotel room containing approximately 200 grams of each drug.

For these reasons, there appear to be set of conditions that would reasonable assure the safety of the community and Hunt's continued appearance if he were released. He should therefore be detained prior to trial.

Dated at Burlington, in the District of Vermont, this 30th day of July, 2015.

Respectfully submitted,

UNITED STATES OF AMERICA
ERIC MILLER
United States Attorney

By: /s/ Michael P. Drescher
MICHAEL P. DRESCHER
Assistant U.S. Attorney
U.S. Attorney's Office
11 Elmwood Ave., PO Box 570
Burlington, VT 05401
michael.drescher@usdoj.gov

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system on July 30, 2015, and the CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF parties:

Counsel for the Defendant

Dated at Burlington, in the District of Vermont, July 30, 2015.

/s/ Michael P. Drescher
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Michael.Drescher@usdoj.gov

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:15-MJ-109
)	
JOHN HOFFMAN,)	
Defendant.)	

CORRECTED MOTION FOR DETENTION

The United States of America, through its Attorney, Eric Miller, United States Attorney for the District of Vermont, moves for pretrial detention of defendant John Hoffman pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. The defendant is eligible for detention because he is charged with an offense involving controlled substances carrying more than a ten-year sentence.

2. Reason For Detention. The Court should detain the defendant because at this time there are no conditions of release which will reasonably assure the safety of the community.

3. Rebuttable Presumption. At this time, the United States does not intend to invoke the rebuttable presumption against the defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing after a continuance of at least one day. *See* 18 U.S.C. § 3142(f).

5. Other Matters.

Several factors weigh in favor of detention. *See generally* 18 U.S.C. § 3142(g). As explained in the Complaint Affidavit, both the nature and circumstances of the offense charged, § 3142(g)(1), as well as the weight of the evidence, § 3142(g)(2), indicate the appropriateness of pre-trial detention. This matter involves a conspiracy to distribute heroin and crack cocaine.

The evidence includes the discovery of large quantities of those drugs in a hotel room to which Hoffman admits having made a delivery of a package he believed to be drugs, as well as Hoffman's other admissions relating to his involvement in this conspiracy.

Hoffman's history and characteristics, § 3142(g)(3), also indicate dangerousness. Law enforcement understands he has a serious substance abuse problem. If that problem is not treated, he can be expected to violate the standard conditions of abstinence and lawfulness and continue to present a danger to himself and others.

For these reasons, there appear to be no set of conditions that would reasonably assure the safety of the community if he were released. He should therefore be detained prior to trial.

Dated at Burlington, in the District of Vermont, this 30th day of July, 2015.

Respectfully submitted,

UNITED STATES OF AMERICA
ERIC MILLER
United States Attorney

By: /s/ Michael P. Drescher
MICHAEL P. DRESCHER
Assistant U.S. Attorney
U.S. Attorney's Office
11 Elmwood Ave., PO Box 570
Burlington, VT 05401
michael.drescher@usdoj.gov

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system on July 30, 2015, and the CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF parties:

Counsel for the Defendant

Dated at Burlington, in the District of Vermont, July 30, 2015.

/s/ Michael P. Drescher
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Michael.Drescher@usdoj.gov

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2015 AUG -6 PM 3: 39

UNITED STATES OF AMERICA,)
)
)
v.)
)
DORSEY HUNT,)
JOHN HOFFMAN, and)
ANGELA HOFFMAN,)
Defendants.)

CLERK
[Signature]
BY _____
DEPUTY CLERK

Docket No. 5:15-cr-114

INDICTMENT

The Grand Jury Charges:

In or about July 2015, in the District of Vermont and elsewhere, defendants DORSEY HUNT, JOHN HOFFMAN, and ANGELA HOFFMAN knowingly and willfully conspired with each other and with others known and unknown to the grand jury to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a), 841(b)(1)(C))

A TRUE BILL



FOREPERSON

[Signature] (MPD)
ERIC S. MILLER
United States Attorney
Burlington, Vermont
August 6, 2015

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

for the
District of Vermont

2015 SEP -3 PM 12: 26

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Room 117 at La Quinta Inn & Suites, 1285 Williston
Road, South Burlington, Vermont

CLERK

Case No.

2:15-mj-132 HSK
DEPUTY CLERK

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the _____ District of _____ Vermont _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
21 U.S. C. §§ 841 & 846

Offense Description
Distribution of controlled substances, possession with intent to distribute controlled substances, and conspiracy to distribute controlled substances

The application is based on these facts:
See the following application

- Continued on the attached sheet.
- Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

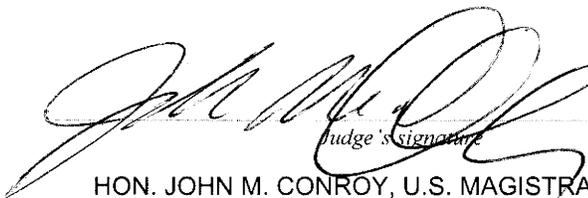
TIMOTHY HOFFMANN, DEA SA

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/03/2015

City and state: Burlington, Vermont



Judge's signature

HON. JOHN M. CONROY, U.S. MAGISTRATE JUDGE

Printed name and title

ATTACHMENT A

PROPERTY TO BE SEARCHED

The Subject Property is described as follows: Room 117 at La Quinta Inn & Suites, 1285 Williston Road, South Burlington, Vermont . The La Quinta Inn & Suites is a commercial hotel with multiple units that is located in South Burlington, Vermont.

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846: conspiracy to distribute controlled substances, including heroin and cocaine base, which is a Schedule I controlled substance, substances suspected to be controlled substances, drug processing and packaging materials, cutting agents, and drug paraphernalia and literature;
2. Any and all documents, records, and items of personal property relating to the purchase and distribution of controlled substances, including the following: telephones and cellular telephones, smart phones (e.g., BlackBerry, Treo, etc.), pagers, answering machines, caller ID boxes, ledgers, account books, receipts, log books, address books, telephone directories, notes, maps, correspondence, customer lists and records, suppliers' lists and records, delivery forms and records, bank and financial records including checks, money orders, mailing receipts, car and mailbox rental records, storage facility rental records, telephone answer pads, records relating to domestic and foreign travel such as tickets, passports visas, and travel schedules, letters, telegrams and telexes;
3. Any and all documents, records and articles of personal property (including safes, duffel backs, and other containers) evidencing the obtaining, secreting, transfer, expenditure, and concealment of contraband, money and assets derived from or to be used in the purchase, and distribution of controlled substances, including: U.S. currency, foreign currency, jewelry, bank

books, bank statements, receipts, warranties, electronics, financial and negotiable instruments, checks, and money orders, records of wire transfers, tax records;

4. Any and all documents, records, and articles of personal property showing the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the Subject Property, including: keys, rental agreements and records; and

5. Any and all passwords necessary to access the data contained within the cellular telephones, smart phones, and other electronic items being seized

6. Any and all ammunition and firearms, including handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons.

Affidavit for Search Warrant

I, Timothy Hoffmann, being sworn, depose and state as follows:

1. I am a special agent ("SA") with the Drug Enforcement Administration ("DEA "). I was hired as a SA with DEA in 2012 and completed my training in 2013. I was a police officer for approximately four years in New York State prior to joining DEA. I am assigned to the DEA's Burlington Resident Office (BRO). In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement: I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including several schools regarding general narcotics investigation; I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. In total, I have received approximately 18 weeks of specialized training at the DEA Academy, including in classes regarding the conducting of narcotics investigations (interdiction, identification, smuggling, clandestine manufacture of drugs, methods of packaging, distribution of drugs, undercover operations, the laundering of drug proceeds, asset forfeiture, use of confidential sources, cooperating witnesses, and other sources of information) and the legal aspects of conducting drug investigations. I have also received specialized training related to the investigation of money laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and heroin, the type of drugs that is being distributed by the target subject under investigation and discussed herein. I have also participated in various aspects of investigatory work, including undercover surveillance and undercover narcotics purchases, and have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants and frequently utilized the services of informants, and other confidential sources of information.
2. I submit this affidavit to establish probable cause in support of a search warrant authorizing the search of Room 117 at La Quinta Inn & Suites, located at 1285 Williston Road, South Burlington Vermont, as described on attachment A, for the property described in Attachment B. The information contained within this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.
3. On 09/02/2015, a DEA Confidential Source (CS1) provided [REDACTED] information about a male it knew as "Unc" [REDACTED]. [REDACTED]
[REDACTED]
[REDACTED]
Unc is utilizing the alias "Gilbert CRUZ." [REDACTED]
[REDACTED]

- [REDACTED]
- [REDACTED]
4. SA Brandon Hope inquired with the hotel on current renters. The hotel desk clerk advised that Gilbert CRUZ was renting room 117. The check in/check out date was September 1, 2015 to September 5, 2015.
 5. On 09/02/2015, [REDACTED] Unc was at the Days Inn in the Bronx, New York. SA Thomas Doud and Diversion Investigator (DI) Christopher Paquette established surveillance in the area of the Days Inn. SA Doud told me that at approximately 8:45PM he observed Unc and two (2) females departing the hotel and travelling north bound on I-95. He told me that he recognized Unc as the person depicted in a photograph I sent him. That photograph was provided to me by Burlington Police Department who took the photography during surveillance in early June 2015.
 6. At approximately 12:30AM this morning DEA agents established surveillance in the area of the La Quinta Inn & Suites. At approximately 3:38AM DEA agents observed Unc being dropped off at the La Quinta Inn and Suites. At approximately 3:42AM TFO Robert Sylvia observed Unc enter room 117. I provided TFO Sylvia with the photograph of Unc described in the previous paragraph, and TFO Sylvia positively identified the male as the individual he encountered at the La Quinta Inn & Suites.
 7. At approximately 4:05AM, I observed Unc and a female standing outside of the La Quinta Inn and Suites.
 8. [REDACTED] Unc was a leader of a drug trafficking organization in the area of Malletts Bay Avenue, Winooski VT. Unc has people working for him to include "JAH" and John HOFFMAN. Unc utilized a location in St. Albans to keep his drugs. John HOFFMAN would travel to St. Albans to pick up drugs and drop off money.
 9. On July 29, 2015, [REDACTED] DEA arrested John HOFFMAN. John HOFFMAN agreed to speak with police, and was interviewed principally by DEA TFO Matthew Cannon. John HOFFMAN advised TFO Cannon, among other things that in July of 2015, John HOFFMAN has been managing distribution at various locations on behalf of Unc. John HOFFMAN stated he had been "running traps" from 9:30AM to midnight each day for Unc, which SA Hope understood to mean transporting drugs and money to and from St. Albans for Unc. John HOFFMAN also advised SA Hope that he understood Unc to use the name Fernando RAMIREZ. John HOFFMAN's criminal history includes misdemeanor convictions for: unlawful trespass (2002), vehicle operation-license suspended #1 for DUI (2006), depressant/stimulant/narcotic-possession, less than 100 (2007), vehicle operation-careless or negligent (2007), vehicle operation-license suspended #2 (2007), petit larceny (2012), assault-simple (2012) and vehicle operation-

license suspended/OSC (2014).

10. On July 29, 2015, this Court issued a search warrant to search a hotel room in Williston Vermont. During the search authorized by that warrant, law enforcement discovered approximately 200 grams of heroin and approximately 200 grams of cocaine base (both substances field-testing a presumptive positive for heroin and cocaine, respectively).
11. Prior to the execution of that search, persons later identified as Dorsey HUNT and Angela HOFFMAN (John HOFFMAN's wife), were observed leaving the hotel room. They were arrested. DEA TFO Matt Cannon found HUNT to be in possession of suspected cocaine base and suspected heroin, among other items. SA Adam Chetwynd found Angela HOFFMAN to be in possession of suspected heroin and suspected crack cocaine. The substances seized from HUNT and Angela HOFFMAN were field tested yielding a presumptive positive result.
12. Both HUNT and Angela HOFFMAN agreed to speak with police. HUNT was interviewed by principally DEA TFO Merchand and, to a lesser extent, myself. Dorsey HUNT advised that his nickname is "JAH." HUNT stated that in April 2015 he had been arrested while in possession of approximately 100 grams of crack cocaine that HUNT was bringing to Vermont for a man known to HUNT as "Unc." HUNT advised that Unc regularly directed HUNT with regard to the delivery of crack cocaine and heroin to different locations in Vermont for those substances to be re-distributed. HUNT also advised that Unc regularly directed HUNT to distribute quantities of these drugs to Angela HOFFMAN and her husband, John HOFFMAN for them to re-distribute. HUNT stated he thought Unc moved around a lot, staying at hotels, and that he changed his phone number frequently. My review of HUNT's criminal record indicates an arrest on April 27, 2015 for felony cocaine possession with intent to distribute/cocaine trafficking and his arrest described above on July 29, 2015.
13. Angela HOFFMAN was also interviewed principally by DEA TFO Merchand and, to a lesser extent, myself. Angela HOFFMAN stated that Unc was a source of supply of crack and heroin, which she would distribute, mostly in the St. Albans area. She stated that on average during the last two (2) weeks in July of 2105, she sold 80 to 120 bags of heroin a day and 10 to 15 bags of crack cocaine daily. During the month of July when she was sold out, she brought sale proceeds to Unc either at a location in the Burlington area, or at a residence she described by physical description and location within St. Albans. My review of Angela Hoffman's criminal record indicates the arrest on July 29, 2015 but she does not have prior convictions. Based on her description of the location, I identified the location as 84 Lincoln Ave.
14. On July 29, 2015, this Court issued a search warrant to search 84 Lincoln Ave., St. Albans, VT. Items seized from the search warrant include a firearm (.45 cal pistol, Taurus), suspected marijuana, containers with false compartments, empty glassine envelopes, among other things. Also seized from the residence include photographs of the person depicted in the photograph provided by BPD described above, the same man I saw at the La Quinta Inn and Suites earlier today. Miscellaneous documents were also seized

to include a Comcast bill for 84 Lincoln Ave. in the name Fernando RAMIREZ. A U-Haul Equipment contract was also seized, with the customer being John HOFFMAN.

15.



Timothy Hoffmann, Special Agent
U.S. Drug Enforcement Administration

Subscribed and sworn to before me this _____ day of September, 2015.

Hon. John M. Conroy
U.S. Magistrate Judge

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
District of Vermont

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Room 117 at La Quinta Inn & Suites, 1285 Williston
Road, South Burlington, Vermont

Case No. 2:15-mj-132

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the District of Vermont
(identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before September 17, 2015 (not to exceed 14 days)
in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to U.S. Magistrate Judge John M. Conroy
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

for days (not to exceed 30) until, the facts justifying, the later specific date of

Date and time issued: Sept. 3, 2015
12:22 p.m.

City and state: Burlington, Vermont

Judge's signature
HON. JOHN M. CONROY, U.S. MAGISTRATE JUDGE
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No.: 2:15-mj-132	Date and time warrant executed: 09/03/2015 @ 1328hrs	Copy of warrant and inventory left with: Rm 117, La Quinta Inn
--------------------------	---	---

Inventory made in the presence of:

No one present

Inventory of the property taken and name of any person(s) seized:

\$9,546.00 U.S. Currency, Samsung Galaxy cellular phone, miscellaneous paperwork, tan powder, blue glassine envelopes, rubber bands (colored and black), spiral notebook, keys, Garmin GPS, multiple pieces of off-white chunky substance, digital scale, HTC cellular telephone, Magellan GPS, coffee grinder/blender, cardboard boxes containing glassine envelopes (white and blue), Apple MacBook, Western Union receipt, Iphone, pink straw, Card, photographs, sneaker box, AT&T Flip cellular phone, ASUS AT&T cellular phone.

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: 9/3/2015

*Executing officer's signature*Timothy Hoffmann, Special Agent*Printed name and title*

ATTACHMENT A

PROPERTY TO BE SEARCHED

The Subject Property is described as follows: Room 117 at La Quinta Inn & Suites, 1285 Williston Road, South Burlington, Vermont . The La Quinta Inn & Suites is a commercial hotel with multiple units that is located in South Burlington, Vermont.

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846: conspiracy to distribute controlled substances, including heroin and cocaine base, which is a Schedule I controlled substance, substances suspected to be controlled substances, drug processing and packaging materials, cutting agents, and drug paraphernalia and literature;
2. Any and all documents, records, and items of personal property relating to the purchase and distribution of controlled substances, including the following: telephones and cellular telephones, smart phones (e.g., BlackBerry, Treo, etc.), pagers, answering machines, caller ID boxes, ledgers, account books, receipts, log books, address books, telephone directories, notes, maps, correspondence, customer lists and records, suppliers' lists and records, delivery forms and records, bank and financial records including checks, money orders, mailing receipts, car and mailbox rental records, storage facility rental records, telephone answer pads, records relating to domestic and foreign travel such as tickets, passports visas, and travel schedules, letters, telegrams and telexes;
3. Any and all documents, records and articles of personal property (including safes, duffel backs, and other containers) evidencing the obtaining, secreting, transfer, expenditure, and concealment of contraband, money and assets derived from or to be used in the purchase, and distribution of controlled substances, including: U.S. currency, foreign currency, jewelry, bank

books, bank statements, receipts, warranties, electronics, financial and negotiable instruments, checks, and money orders, records of wire transfers, tax records;

4. Any and all documents, records, and articles of personal property showing the identity of persons occupying, possessing, residing in, owning, frequenting, or controlling the Subject Property, including: keys, rental agreements and records; and

5. Any and all passwords necessary to access the data contained within the cellular telephones, smart phones, and other electronic items being seized

6. Any and all ammunition and firearms, including handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers and other weapons.

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

for the
District of Vermont

2015 SEP -4 PM 12: 58

United States of America)

v.)

Sarah Ellwood)

Case No.)

BY  DEPUTY CLERK

2:15mj135-1

Defendant(s)

CRIMINAL COMPLAINT

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 July 2015 in the county of Franklin in the
District of Vermont, the defendant(s) violated:

Code Section

Offense Description

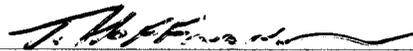
21 U.S.C. section 856

while managing and controlling apartment 1s at 84 Lincoln Ave, St. Albans, Vermont as lessee, knowingly and intentionally made available for use said residence for the purpose of unlawfully storing and distributing heroin a schedule I controlled substance, and cocaine base a schedule II controlled substance, and storing marijuana, a schedule I controlled substance.

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.



Complainant's signature

DEA SA TIMOTHY HOFFMANN

Printed name and title

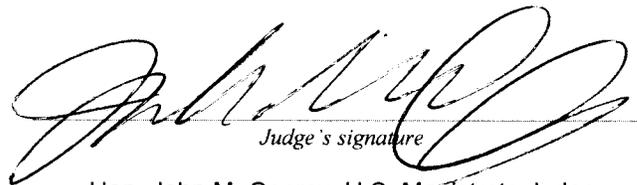
Sworn to before me and signed in my presence.

Date:

9/4/2015

City and state:

Burlington, Vermont



Judge's signature

Hon. John M. Conroy, U.S. Magistrate Judge

Printed name and title

Affidavit for Search Warrant

I, Timothy Hoffmann, being sworn, depose and state as follows:

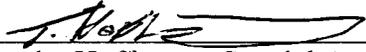
1. I am a special agent ("SA") with the Drug Enforcement Administration ("DEA "). I was hired as a SA with DEA in 2012 and completed my training in 2013. I was a police officer for approximately four years in New York State prior to joining DEA. I am assigned to the DEA's Burlington Resident Office (BRO). In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement: I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including several schools regarding general narcotics investigation; I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. In total, I have received approximately 18 weeks of specialized training at the DEA Academy, including in classes regarding the conducting of narcotics investigations (interdiction, identification, smuggling, clandestine manufacture of drugs, methods of packaging, distribution of drugs, undercover operations, the laundering of drug proceeds, asset forfeiture, use of confidential sources, cooperating witnesses, and other sources of information) and the legal aspects of conducting drug investigations. I have also received specialized training related to the investigation of money laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and heroin, the type of drugs that is being distributed by the target subject under investigation and discussed herein. I have also participated in various aspects of investigatory work, including undercover surveillance and undercover narcotics purchases, and have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants and frequently utilized the services of informants, and other confidential sources of information.
2. I submit this affidavit to establish probable cause to conclude that Sarah Ellwood violated 21 U.S.C. § 856 by leasing an apartment located at 84 Lincoln Avenue, in St. Albans, Vermont and making that apartment available for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.
3. On September 3, 2015, this Court issued a search warrant to search room 117 at the La Quinta hotel on Williston Road, in South Burlington. Prior to executing this search, agents observed Villanueva on September 3 entering and exiting this room.
4. Moments before executing this warrant, law enforcement, including myself, observed Villanueva and Ellwood exit the hotel through its East Side door. Based on information known to law enforcement, Villanueva and Ellwood were arrested. Villanueva had a key to Room 117.

5. In searching the room, law enforcement found, among other items:
 - a. approximately 80 grams of cocaine base and 23 grams of heroin (both field testing positive for cocaine and heroin, respectively);
 - b. a digital scale;
 - c. small plastic and wax bags commonly used for packaging heroin and cocaine base;
 - d. a Vermont identification card for Sarah Ellwood, as well as a debit or credit card also in her name;
 - e. a coffee grinder with a tan powdery residue consistent with heroin; and
 - f. \$9,546 in cash.
6. The majority of the cocaine base found within the hotel room was located in an open black box on a couch in plain view. The heroin was located in a dresser drawer that also included money and wax envelopes and a metal tray.
7. Also shortly before executing the warrant, DEA agents observed Livingston as she got off the greyhound bus from New York city (with a stop in Boston), at the Burlington Airport. Agents observed Livingston carrying a black back pack and a black cloth bag over her shoulder. Agents arrested Livingston. Agents asked if the bags was hers and she said no. She said she was bringing the bags for a friend. She admitted that her identification was contained within an outer compartment within the cloth bag.
8. Agents searched the cloth bag. Within the bag agents found approximately 200 grams of heroin and approximately 200 grams of cocaine base (both field testing positive for heroin and cocaine, respectively), within Pringles containers.
9. After his arrest, Villanueava waived Miranda and spoke with police. He admitted the following:
 - a. He has been involved in selling heroin and cocaine base in Vermont since August 2014;
 - b. he had lived at 84 Lincoln Ave., in St. Albans with Ellwood;
 - c. Ellwood is his "wife";
 - d. the drugs Livingston was carrying were for delivery to him for redistribution;
 - e. he knew there was a warrant for his arrest, and used multiple alias names to avoid detection;
 - f. his nickname in Vermont was "Unc."
10. After her arrest, Livingston waived Miranda and admitted that she was going to meet "Unc" at the La Quinta hotel. She admitted to making similar trips to Vermont from New York, on two or three other occasions. She admitted to knowing there were clothing and Pringles containers within the bag. The drugs were found within Pringles containers. She admitted that half of her rent was covered by the money she made by making these trips to Vermont.
11. After her arrest, Ellwood waived Miranda and admitted the following:

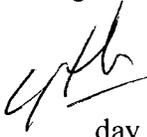
- a. she admitted to being Unc's girlfriend;
 - b. she and Unc had lived at a residence on Lincoln Ave in St. Albans, Vermont since last winter, but she now lived at an address in Burlington;
 - c. she denied knowing that drugs were present in the room at the La Quinta;
 - d. did not want to know what Unc was up to, and did not want to be involved;
 - e. she used heroin on a daily basis; and
 - f. she stole heroin from Unc's personal stash for her personal use.
12. On July 29, 2015, this Court issued a search warrant to search a hotel room in Williston Vermont. Before execution of the search DEA confirmed with hotel staff that it was rented to Sarah Ellwood. During the search authorized by that warrant, law enforcement discovered approximately 200 grams of heroin and approximately 200 grams of cocaine base (both substances field-testing a presumptive positive for heroin and cocaine, respectively).
13. Prior to the execution of that search, persons later identified as Dorsey HUNT and Angela HOFFMAN (John HOFFMAN's wife), were observed leaving the hotel room. They were arrested. DEA TFO Matt Cannon found HUNT to be in possession of suspected cocaine base and suspected heroin, among other items. SA Adam Chetwynd found Angela HOFFMAN to be in possession of suspected heroin and suspected crack cocaine. The substances seized from HUNT and Angela HOFFMAN were field tested yielding a presumptive positive result.
14. Both HUNT and Angela HOFFMAN agreed to speak with police. HUNT was interviewed principally by DEA TFO Merchand and, to a lesser extent, myself. HUNT advised that Unc regularly directed HUNT with regard to the delivery of crack cocaine and heroin to different locations in Vermont for those substances to be re-distributed. HUNT also advised that Unc regularly directed HUNT to distribute quantities of these drugs to Angela HOFFMAN and her husband, John HOFFMAN for them to re-distribute. HUNT stated he thought Unc moved around a lot, staying at hotels, and that he changed his phone number frequently. My review of HUNT's criminal record indicates an arrest on April 27, 2015 for felony cocaine possession with intent to distribute/cocaine trafficking and his arrest described above on July 29, 2015.
15. Angela HOFFMAN was also interviewed principally by DEA TFO Merchand and, to a lesser extent, myself. Angela HOFFMAN stated that Unc was a source of supply of crack and heroin, which she would distribute, mostly in the St. Albans area. She stated that on average during the last two (2) weeks in July of 2105, she sold 80 to 120 bags of heroin a day and 10 to 15 bags of crack cocaine daily. During the month of July when she was sold out, she brought sale proceeds to Unc either at a location in the Burlington area, or at a residence she described by physical description and location within St. Albans. Based on her description of the location, I identified the location as 84 Lincoln Ave, apartment 1S. She also stated that she was resupplied these drugs from Lincoln Avenue address. My review of Angela Hoffman's criminal record indicates the arrest on July 29, 2015 but

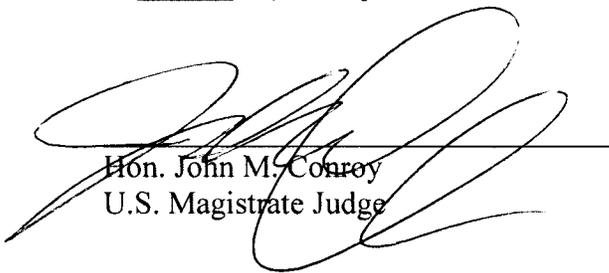
she does not have prior convictions.

16. On July 29, 2015, this Court issued a search warrant to search a residence located at 84 Lincoln Ave., St. Albans, VT. Upon his arrest yesterday, Villanueva confirmed that he lived at this address with Ellwood. DEA has independently confirmed with the land-lord for this residence that he had rented it to Sarah Ellwood at the time of the search. Items seized from the search warrant included a firearm (.45 cal pistol, Taurus), suspected marijuana, containers with false compartments, empty glassine envelopes, among other things. Also seized from the residence include photographs of Ellwood and Villanueva.



Timothy Hoffmann, Special Agent
U.S. Drug Enforcement Administration

Subscribed and sworn to before me this  day of September, 2015.



Hon. John M. Conroy
U.S. Magistrate Judge

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT

for the
District of Vermont

2015 SEP -4 PM 12: 58

United States of America)
v.)
Michael Villanueva and)
Felicia Livingston)
)
)
)
)
)
)

Case No.

CLERK
BY 
DEPUTY CLERK

2:15-mj-136-1-2

Defendant(s)

CRIMINAL COMPLAINT

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

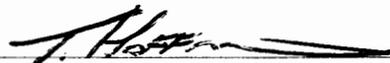
On or about the date(s) of September 3, 2015 in the county of Chittenden in the
District of Vermont, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. section 846	knowingly and willfully conspiring to distribute heroin, a schedule I controlled substance, and cocaine base, a schedule II controlled substance.

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

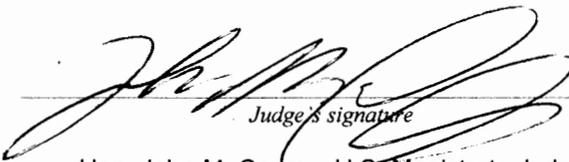

Complainant's signature

DEA SA TIMOTHY HOFFMANN
Printed name and title

Sworn to before me and signed in my presence.

Date: 9/4/2015

City and state: Burlington, Vermont


Judge's signature

Hon. John M. Conroy, U.S. Magistrate Judge
Printed name and title

Affidavit for Search Warrant

I, Timothy Hoffmann, being sworn, depose and state as follows:

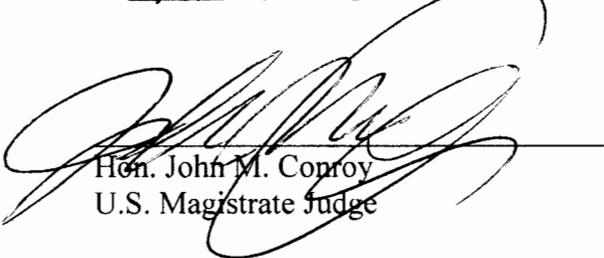
1. I am a special agent ("SA") with the Drug Enforcement Administration ("DEA "). I was hired as a SA with DEA in 2012 and completed my training in 2013. I was a police officer for approximately four years in New York State prior to joining DEA. I am assigned to the DEA's Burlington Resident Office (BRO). In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement: I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including several schools regarding general narcotics investigation; I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. In total, I have received approximately 18 weeks of specialized training at the DEA Academy, including in classes regarding the conducting of narcotics investigations (interdiction, identification, smuggling, clandestine manufacture of drugs, methods of packaging, distribution of drugs, undercover operations, the laundering of drug proceeds, asset forfeiture, use of confidential sources, cooperating witnesses, and other sources of information) and the legal aspects of conducting drug investigations. I have also received specialized training related to the investigation of money laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and heroin, the type of drugs that is being distributed by the target subject under investigation and discussed herein. I have also participated in various aspects of investigatory work, including undercover surveillance and undercover narcotics purchases, and have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants and frequently utilized the services of informants, and other confidential sources of information.
2. I submit this affidavit to establish probable cause to conclude that Michael Villanueva and Felicia Livingston conspired to distribute heroin and cocaine base in violation of 21 U.S.C. §§ 841(a)(1) and 846. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.
3. On September 3, 2015, this Court issued a search warrant to search room 117 at the La Quinta hotel on Williston Road, in South Burlington. Prior to executing this search, agents observed Villanueva on September 3 entering and exiting this room.
4. Moments before executing this warrant, law enforcement, including myself, observed Villanueva and Ellwood exit the hotel through its East Side door. Based on information known to law enforcement, Villanueva and Ellwood were arrested. Villanueva had a key to Room 117.
5. In searching the room, law enforcement found, among other items:

- a. approximately 80 grams of cocaine base and 23 grams of heroin (both field testing positive for cocaine and heroin, respectively);
 - b. a digital scale;
 - c. small plastic and wax bags commonly used for packaging heroin and cocaine base;
 - d. a Vermont identification card for Sarah Ellwood, as well as a debit or credit card also in her name;
 - e. a coffee grinder with a tan powdery residue consistent with heroin; and
 - f. \$9,546 in cash.
6. The majority of the cocaine base found within the hotel room was located in an open black box on a couch in plain view. The heroin was located in a dresser drawer that also included money and wax envelopes and a metal tray.
7. Also shortly before executing the warrant, DEA agents observed Livingston as she got off the greyhound bus from New York city (with a stop in Boston), at the Burlington Airport. Agents observed Livingston carrying a black back pack and a black cloth bag over her shoulder. Agents arrested Livingston. Agents asked if the bags was hers and she said no. She said she was bringing the bags for a friend. She admitted that her identification was contained within an outer compartment within the cloth bag.
8. Agents searched the cloth bag. Within the bag agents found approximately 200 grams of heroin and approximately 200 grams of cocaine base (both field testing positive for heroin and cocaine, respectively), within Pringles containers.
9. After his arrest, Villanueava waived Miranda and spoke with police. He admitted the following:
- a. He has been involved in selling heroin and cocaine base in Vermont since August 2014;
 - b. he had lived at 84 Lincoln Ave., in St. Albans with Ellwood;
 - c. Ellwood is his "wife";
 - d. the drugs Livingston was carrying were for delivery to him for redistribution;
 - e. he knew there was a warrant for his arrest, and used multiple alias names to avoid detection;
 - f. his nickname in Vermont was "Unc."
10. After her arrest, Livingston waived Miranda and admitted that she was going to meet "Unc" at the La Quinta hotel. She admitted to making similar trips to Vermont from New York, on two or three other occasions. She admitted to knowing there were clothing and Pringles containers within the bag. The drugs were found within Pringles containers. She admitted that half of her rent was covered by the money she made by making these trips to Vermont.



Timothy Hoffmann, Special Agent
U.S. Drug Enforcement Administration

Subscribed and sworn to before me this 4th day of September, 2015.



John M. Conroy
U.S. Magistrate Judge

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Docket No. 2:15-MJ-135
)	
SARAH ELLWOOD,)	
Defendant.)	

MOTION FOR DETENTION

The United States of America, by and through its attorney, Eric S. Miller, United States Attorney for the District of Vermont, moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substance Act for which a maximum term of imprisonment of ten years or more is prescribed, and a serious risk that defendant will flee. *See* 18 U.S.C. §§ 3142(f)(1)(C), 3142(f)(2)(A).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of the community or her continued appearance.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).

4. Other Matters. In the last year, Ellwood has failed to appear for Vermont Criminal Court appearances at least five times. Her criminal history includes two misdemeanor convictions (retail theft earlier this year, and domestic assault in 2012). By her own admission, at or near the time of her arrest, the defendant was an active opiate user, and this addiction has played a part in her commission of the charged offense.

As the Court is aware, active opiate users are usually unable to stop their drug use on their own, even when non-use and urinalysis testing are made conditions of their release. Instead, successful cessation of opiate use normally requires drug treatment. Opiate users without substantial wealth will often engage in criminal activity, including drug trafficking or property crimes, to obtain resources to obtain drugs for their use. Because the defendant has not yet arranged meaningful drug treatment, the Court should find that no conditions of release will reasonably assure the safety of the community.

The Government may reconsider its opposition to release if and when the defendant has proposed a specific treatment program and is eligible and able to begin that treatment program. However, the government urges to the Court not to release the defendant to a treatment program until the government and the Court can assess several aspects of the proposed treatment plan.

First, the Court should not consider releasing the defendant into a treatment program before the defendant has substantially detoxed from opiate use and the Probation Office has had a chance to assess the propriety of any treatment program in light of the defendant's health, drug use, and criminal history.

Second, the Court should not consider releasing the defendant into a treatment program until the defendant has identified a particular program and facility through which he is able and eligible to receive the appropriate treatment. The defendant should also identify specific travel plans to the facility after release from detention as well as travel plans after completion of the in-patient program.

Third, the Court should not consider releasing the defendant into a treatment program until the defendant has, to the extent practicable, proposed an appropriate after-care plan, such as out-patient drug treatment, along with a suitable post-treatment residence

The government urges the Court to delay the next hearing on this matter until such time as a proposed treatment plan can be developed and assessed. Prior to that hearing, the defense should document the specifics of the proposed plan, as set forth above, for review by the Probation Office and the government and the Probation Office should then be provided with an opportunity to make a recommendation to the Court on the proposed plan. The government reserves the right to oppose release or to not oppose release after reviewing the proposed plan.

Dated at Burlington, in the District of Vermont, this 8th day of September, 2015.

Respectfully submitted,

UNITED STATES OF AMERICA
ERIC MILLER
United States Attorney

By: /s/ Michael P. Drescher
MICHAEL P. DRESCHER
Assistant U.S. Attorney
U.S. Attorney's Office
11 Elmwood Ave., PO Box 570
Burlington, VT 05401
michael.drescher@usdoj.gov

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system on September 8, 2015, and the CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF parties:

Robert Sussman, Esq.

Dated at Burlington, in the District of Vermont, September 8, 2015.

/s/ Michael P. Drescher
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Michael.Drescher@usdoj.gov

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:15-MJ-136
)	
MICHAEL VILLANUEVA,)	
Defendant.)	

MOTION FOR DETENTION

The United States of America, through its Attorney, Eric Miller, United States Attorney for the District of Vermont, moves for pretrial detention of defendant John Hoffman pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. The defendant is eligible for detention because he is charged with an offense involving controlled substances carrying more than a ten-year sentence.

2. Reason For Detention. The Court should detain the defendant because at this time there are no conditions of release which will reasonably assure the safety of the community or his continued appearance.

3. Rebuttable Presumption. The United States does not intend to invoke the rebuttable presumption against the defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing at today's initial appearance. *See* 18 U.S.C. § 3142(f).

5. Other Matters.

Several factors weigh in favor of detention. *See generally* 18 U.S.C. § 3142(g). As explained in the Complaint Affidavit, both the nature and circumstances of the offense charged, § 3142(g)(1), as well as the weight of the evidence, § 3142(g)(2), indicate the appropriateness of pre-trial detention. This matter involves a conspiracy to distribute heroin and crack cocaine. The evidence includes the discovery of about a half a pound of heroin and 80 grams of crack cocaine, either in a bag heading to the defendant or in his hotel room. In addition, the defendant made post-arrest admissions that are also inculpatory. It should also be noted that during an August 2015 search of his St. Albans residence, law enforcement found a hand-gun and ammunition.

Also, Villanueva's criminal history makes clear that there are no set of conditions that can assure the safety of the community or his continued appearance. In 2007 he was convicted in Bronx County, New York, of attempted assault, 1st degree: intent to cause serious injury with a weapon (having originally been arrested for murder and other offenses). He was sentenced to 5 year's incarceration to be

followed by 5 years of post-release supervision. Less than 40 days after he was paroled in January 2012, New York Parole officials obtained a warrant for his arrest.¹

Villanueva was aware of his wanted status. Months ago, before his identity was known, law enforcement heard him tell another individual that he could not use his real name in dealing with a governmental agency. So in addition to being caught with large quantities of heroin, he has been a fugitive for over three years. Law enforcement is now aware that he used at least two fake names during time on the lam.

His other felony convictions include two drug distribution felonies, and attempted robbery.

It is clear there are no conditions that will address this defendant's dangerousness, or his risk on non-appearance.

Dated at Burlington, in the District of Vermont, this 8th day of September, 2015.

Respectfully submitted,

UNITED STATES OF AMERICA
ERIC MILLER
United States Attorney

By: /s/ Michael P. Drescher
MICHAEL P. DRESCHER

¹ New York authorities have lodged a detainer with the United States Marshal's service relative to this warrant.

Assistant U.S. Attorney
U.S. Attorney's Office
11 Elmwood Ave., PO Box 570
Burlington, VT 05401
michael.drescher@usdoj.gov

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system on September 8, 2015, and the CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to the following NEF parties:

Richard R. Goldsborough, Esq.

Dated at Burlington, in the District of Vermont, September 8, 2015.

/s/ Michael P. Drescher
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
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