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AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Andre Lee Scott
Adolfo Verdugo Lopez
Manuel Arnulfo Barajas

Case: 2:17-mj-30334
Assigned To : Unassigned
Assign. Date : 7/10/2017
Description: CMP USA V SCOTT, ET AL (BG)

CRIMINAL COMPLAINT

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

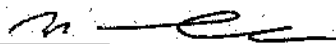
On or about the date(s) of July 10, 2017 in the county of Wayne in the Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii)	Possession with Intent to Distribute Heroin

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.


Complainant's signature

Michael Reamer, Special Agent, DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: JUL 10 2017


Judge's signature

City and state: Detroit, MI

Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Affiant, Special Agent Michael Reamer, being duly sworn, deposes and states the following:

1. Affiant is a Special Agent (SA) of the Drug Enforcement Administration and has been employed with DEA-Detroit since July of 2014. Prior to employment with DEA, affiant worked as a border patrol agent for seven (7) years. Affiant has received specialized training on the subject of illegal drug trafficking in Quantico, Virginia. I have participated in numerous investigations related to illegal drug trafficking, conducted or participated in surveillances, the execution of search warrants. Affiant is a law enforcement officer empowered to conduct investigations and make arrests for Violations of Title 21, United States Code.
2. This affidavit is provided in support of a criminal complaint against Andrea Lee SCOTT, DOB: XX/XX/1991; Adolfo VERDUGO LOPEZ, DOB: XX/XX/1966; and Manuel Arnulfo BARAJAS, DOB: XX/XX/1995, and is based upon my personal knowledge obtained from personal observation, review of documents, and information received from other law enforcement agents. Because of the limited purpose of this affidavit, I have not set forth all of the information of which I have become aware in the course of this investigation.

3. On June 29, 2017, the Honorable Anthony P. Patti, Magistrate, Eastern District of Michigan authorized a federal search warrant for 42284 Joyce Lane, Novi, Michigan, an apartment located on the second floor of a condominium complex.
4. On July 10, 2017, DEA agents along with officers from the Oakland County Narcotics Investigation Team (NET) executed the search warrant at approximately 9:30 a.m. Officers loudly announced their presence, with no response. Officers gained entry by utilizing a key provided by the leasing office of the condominium complex where the address was located. All officers in the entry team were clearly marked with police insignia.
5. Upon entering the residence, three individuals were encountered, Andre Lee SCOTT, Adolfo VERDUGO-LOPEZ, and Manuel Arnulfo BARAJAS. SCOTT and VERDUGO-LOPEZ were sitting in the living room of the residence. BARAJAS was located in the bathroom. Officers cleared and secured the rest of the residence and found no other individuals inside.
6. During a search of the residence, which was sparsely furnished, agents found suspected narcotics in plain view located in several places throughout the residence. Immediately upon making entry into the residence, officers first entered a dining area, which contained a table. This room is connected to the living room where SCOTT and VERDUGO-LOPEZ were sitting. On the table, clearly visible to any occupant, were eight (8) brick shaped objects, which through training and

experience, were immediately recognizable as packaged kilograms of narcotics. Several of the kilograms on the table were cut open and the contents observable. The exposed contents were light brown/tan in color, which I know through training and experience to resemble heroin. These packages were labeled as Exhibit 12 and weighed a total of eleven (11) gross kilograms.

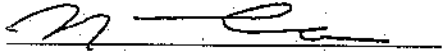
7. A K9 officer, present as part of the search warrant execution, conducted a search of the residence after the above referenced suspected narcotics were observed in plain view. The K9, properly trained and certified in the detection of narcotics, indicated positively to the presence of narcotics on all the eight (8) packages found on the table as well as the following:
8. In the bedroom closets agents discovered more brick shaped objects in plain view, that through training and experience appeared to be kilograms of narcotics. These were later labeled as Exhibit 13 and weighed 27.5 gross kilograms. Also, located in the closet, next to several of the kilograms was a still undetermined amount of bulk United States Currency.
9. Inside the residence, agents located keys to a rental vehicle that was determined to be rented by SCOTT, based on paperwork found at the location. A K9 search of the vehicle, parked in front of 42284 Joyce Lane, found an additional kilogram of suspected narcotics under the passenger front seat. This was later labeled as Exhibit 14 and weighed 1.185 gross kilograms.

10. All kilograms recovered from the residence were packaged in a manner consistent with how this investigator has encountered kilogram quantities of heroin in past investigations. Also, several of the kilograms that were cut open and visible were light brown/tan in color, and physically resembled heroin, which this investigator has repeatedly encountered in past investigations.

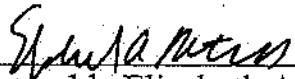
11. Due to the deadly hazards of powerful opiates such as fentanyl and carfentanyl being mixed into powder form narcotics, particularly heroin, and the risk of contamination to this investigator, all exhibits found did not undergo a field test. Based on my training and experience as a narcotics enforcement detective, I have probable cause to believe that all exhibits are a mixture and substance containing a detectable amount of heroin.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

12. Based on the foregoing, as well as his training and experience, it is your Affiant's belief that there is probable cause to support the issuance of a criminal complaint against Andre Lee SCOTT, Adolfo VERDUGO-LOPEZ, and Manuel Arnulfo BARAJAS for Possession with Intent to Distribute Heroin, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii), 18 U.S.C. § 2.


SA Michael Reamer
Drug Enforcement Administration

Sworn to before me and signed in my presence and/or by reliable electronic means.


Honorable Elizabeth A. Stafford
United States District Court
Eastern District of Michigan

Dated: JUL 10 2017