

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brian Connerney, being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as an Arlington Police Officer since 2000. I have held the rank of Inspector since 2005. Since March of 2012, I have been assigned as a deputized Task Force Officer of the United States Drug Enforcement Administration (“DEA”). I am a graduate of the Canton, Massachusetts Municipal Police Academy.

2. As an Arlington Police Inspector and DEA Task Force Officer, I am authorized to investigate violations of the laws of the United States, including violations of federal narcotics laws in Title 21 of the United States Code. I have received training regarding narcotics investigations while attending the police academy and have attended additional specialized training courses in furtherance of my past and current assignments, including the Basic Narcotic Investigation course conducted and presented by the DEA training staff.

3. I have participated in all aspects of drug investigations, including physical surveillance, surveillance of undercover transactions, the introduction of undercover agents, the execution of search warrants, the effecting of arrests, debriefings of defendants, informants and witnesses who had personal knowledge regarding major narcotics trafficking organizations, and the court-authorized interception of communications. I have also reviewed taped conversations and telephone, financial, and drug records. Through my training and experience, I have become familiar with the manner in which illegal drugs are imported, transported, stored, and distributed, and the methods of payment for such drugs.

4. During my time with the DEA, I have participated in numerous wiretap investigations. In connection with my participation in prior wiretap investigations, I have listened

to intercepted communications, reviewed transcripts of those communications, and reviewed intercepted text messages. I also have conducted physical surveillance in connection with wiretap investigations, as well as utilized GPS devices on automobiles and GPS information for cellular telephones to surveil targets of wiretap investigations. I have worked with cooperating witnesses in conjunction with wiretap investigations and have debriefed targets of wiretaps after they have been arrested. I also have executed search warrants during the course of wiretap investigations, and participated in seizures of drugs and drug proceeds in connection with such investigations.

5. Based on my training and experience, I am aware that drug traffickers commonly use cellular telephones to communicate and further their drug-trafficking activities. However, drug traffickers are aware of law enforcement's use of electronic surveillance, and thus frequently endeavor to thwart detection by changing cellular telephone numbers, using multiple cellular phones at the same time, and/or utilizing prepaid cellular phones where the user of the phone is not required to provide personal identifying information. I am also aware that drug traffickers frequently "drop" or change cellular telephone numbers and cellular telephones in an effort to thwart law enforcement's use of electronic surveillance. I am familiar with the manner in which narcotics traffickers use coded, veiled, or slang-filled telephone conversations when discussing their illegal business, in an effort to further prevent detection, and that they often use text messages in lieu of telephone calls to avoid speaking over the telephone. I am familiar with the "street" language used by drug traffickers, as well as the methods they use to disguise conversation and operations.

6. I am familiar with the facts and circumstances of the investigation described herein based on my personal participation in this investigation since approximately May 2022. I make this affidavit based upon personal knowledge derived from my participation in this investigation

and upon information (whether received directly or indirectly) that I believe to be reliable from numerous sources including the following:

- a. My training and experience investigating narcotics-trafficking crimes;
- b. Oral reports, written reports, and documents that I have received from DEA and other federal, state, and local law enforcement agents;
- c. Physical surveillance conducted by me and other federal, state, and local law enforcement officers;
- d. Sources of information who have provided information to law enforcement;
- e. Undercover purchases of narcotics;
- f. Public records;
- g. Business records;
- h. Telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- i. Precise location information for telephones used by some of the Target Subjects;
- j. Global positioning system tracking information;
- k. Consensually recorded telephone calls;
- l. Intercepted communications;
- m. Drug and money seizures; and
- n. Queries of law enforcement records and intelligence databases.

#### PURPOSE OF AFFIDAVIT

7. I submit this affidavit in support of a Criminal Complaint charging the following individuals with violating Title 21, United States Code, Section 846 (conspiracy to distribute fentanyl and cocaine):

- a. Yulial CUELLO-REYNOSO a/k/a “Sonny”;

b. Yordania ABEL RIVERA a/k/a “Mommy”;

[REDACTED]

d. Jorge VIZCAINO Vizcaino a/k/a Yeison VIZCAINO Vizcaino a/k/a “Jason”  
a/k/a “Libreta”;

e. Rafael CONCEPCION a/k/a “Menor”;

f. Alinson Joel ORTIZ ARIAS;

g. Axel BREA BAEZ;

h. Denly SOTO-TEJEDA a/k/a “Gordo”;

i. Yeiron Vizcaino Vizcaino a/k/a “Boli” (“YEIRON”);

[REDACTED]

k. Alberto GONZALEZ;

l. Luis GUERRERO;

m. Mariela Cuello Reynoso (“MARIELA”);

n. Elisbania TEJEDA-SOTO a/k/a “Lisbania”;

o. Rubert Adrian JIMENEZ a/k/a “Soga”;

p. Yeikel PEREZ-TEJEDA;

q. Adrian SUNCAR-GONZALEZ;

[REDACTED]

[REDACTED]

[REDACTED]

u. Johangel MEJIA HERNANDEZ;

[REDACTED]

w. Francisco TAVAREZ CONTRERAS;

- x. Santo FRANCO-SANCHEZ;
- y. Carlos Abel Rivera (“CARLOS”); and
- z. Anthony CUOCO,

collectively, the “Target Subjects.”

8. This affidavit does not set forth all the facts developed during the course of this investigation. Rather, it sets forth only those facts that are necessary and sufficient to establish probable cause to believe that the Target Subjects identified herein have committed the above-described controlled substance offense. All times referenced herein are approximate, and all interpretations of communications or events described below are based on my training and experience, as well as my familiarity with this investigation.

#### SUMMARY OF EVIDENCE

9. In March 2022, law enforcement officers began making a series of undercover purchases of fentanyl from a drug distribution organization led by CUELLO-REYNOSO. Ultimately, the investigation involved twenty-nine undercover purchases of drugs, as set forth in Exhibit A hereto. The undercover (“UC”) purchases of drugs showed that CUELLO-REYNOSO and others operated a customer telephone, which telephone number changed over the course of the investigation, to take drug orders from customers. The organization then dispatched distributors to deliver the drugs to the customers. During each of the UC purchases referenced in Exhibit A, the UC contacted the customer telephone and requested in coded language to purchase a quantity of fentanyl. The UC was provided with an address at which to meet a distributor. At that address, the UC met with a distributor for the target organization, gave that distributor payment for the requested drugs, and received the drugs from the distributor. The UC purchases were surveilled by law enforcement officers and recorded, and some of the UC communications with the customer

line also were recorded. CUELLO-REYNOSO, ABEL RIVERA, and [REDACTED] all coordinated delivery of fentanyl to the undercover law enforcement officer (the “UC”) during the course of the investigation. VIZCAINO, [REDACTED] FRANCO-SANCHEZ, PEREZ-TEJEDA, [REDACTED] SUNCAR-GONZALEZ, JIMENEZ, TEJEDA-SOTO, and CARLOS all delivered fentanyl to the UC on at least one occasion.

10. Beginning in March 2023, investigators obtained authorization to intercept communications over telephones used by members of the CUELLO-REYNOSO drug trafficking organization (“DTO”). Investigators conducted court-authorized interception of 15 telephones during the course of this investigation. The interception orders and corresponding telephones are set forth in Exhibit B. Interceptions over the various Target Telephones confirmed that the DTO used a customer telephone to take drug orders and a runner dispatch telephone to coordinate delivery of the drugs. Interceptions also showed that the organization employed multiple drug distributors simultaneously; used multiple stash locations to process, package, and store drugs and drug proceeds; used dedicated vehicles for distributors; transported drugs in hidden compartments and in socks concealed in the engine compartments of the vehicles; used a color-coded system to differentiate between types of drugs within packaging; and changed telephone numbers very frequently in an attempt to avoid law enforcement detection. CUELLO-REYNOSO, [REDACTED] [REDACTED] VIZCAINO, CONCEPCION, ORTIZ ARIAS, SOTO-TEJEDA, YEIRON, [REDACTED] [REDACTED] MARIELA, TEJEDA-SOTO, JIMENEZ, PEREZ-TEJEDA, and CUOCO all were intercepted discussing drug trafficking over the wiretaps. The Target Subjects discussed herein were identified as the users of the telephones attributed to them based on subscriber information for telephones, physical surveillance done in conjunction with interceptions, precise location

information for telephones together with physical surveillance, and seizures of telephones during arrests.

11. In about May 2024, VIZCAINO, who had worked as a drug distributor for CUELLO-REYNOSO for an extended period of time, began operating his own drug dispatch telephone number. TEJEDA-SOTO, who is his paramour, worked with him, making deliveries of drugs. VIZCAINO worked with CONCEPCION, among others, to obtain drugs for distribution.

12. During the course of the investigation, federal, state, and local law enforcement officers have received or seized drugs and in some cases drug proceeds from the following Target Subjects: CUELLO-REYNOSO; VIZCAINO; ORTIZ ARIAS; BREA BAEZ; SOTO-TEJEDA; YEIRON; [REDACTED] GONZALEZ; GUERRERO; JIMENEZ; PEREZ-TEJEDA; SUNCAR-GONZALEZ; [REDACTED] [REDACTED] MEJIA HERNANDEZ; [REDACTED] FRANCO-SANCHEZ; TAVAREZ CONTRERAS; and CARLOS. These seizures, which did nothing to deter or even interrupt the criminal conduct of the organization, are discussed below. Selected seizures other than undercover purchases are set forth in Exhibit C hereto. All laboratory-tested fentanyl seized from the Target Subjects also has contained xylazine.

#### PROBABLE CAUSE

13. This affidavit summarizes probable cause by Target Subject but does not set forth all of the evidence with respect to any particular proposed defendant.

Yulial CUELLO-REYNOSO a/k/a "Sonny"

14. CUELLO-REYNOSO is the leader of the target DTO. CUELLO-REYNOSO usually operates the customer telephone and/or the distributor dispatch telephone. He coordinated the majority of the UC purchases of fentanyl, and he was intercepted discussing or alluding to many of the drug seizures summarized herein. CUELLO-REYNOSO was one of the users of

Target Telephone #1 ((857) 465-0296) and Target Telephone #2 ((857) 675-0584), and he was the user of Target Telephone #3 ((505) 417-5450) and Target Telephone #4 ((351) 230-8403). CUELLO-REYNOSO also was intercepted over VIZCAINO's and MARIELA's telephones. He was intercepted directing distributors to make deliveries of drugs and giving instructions to other members of the organization.

15. Although CUELLO-REYNOSO sometimes spoke in lightly coded language – including directing distributors to make drug deliveries based on the size and color of the bag of drugs the customer had ordered – at other times, CUELLO-REYNOSO spoke directly about the business he was engaged in. For example, on August 2, 2023, in the course of directing a drug distributor to make deliveries, CUELLO-REYNOSO was intercepted over Target Telephone #3 as follows: At 3:29 p.m., CUELLO-REYNOSO spoke with an unidentified male using telephone number (617) 858-7403 (“UM7403”). During the call, UM7403 said, “I don’t like this area. There are a lot of people and school children. The guy got in immediately, and I wanted to tell him not to get in. I was going to turn, to take it out and give it to him.” CUELLO-REYNOSO said, “Buddy, yes, but you needed to have it out, dude. You can’t wait to take it out with him because we can’t be doing that. It’s an issue.” UM7403 said, “Okay,” and CUELLO-REYNOSO continued, “*Because we’re selling drugs*. Do you get me, dude? And we need to do things quick. You know. [Unintelligible], bro.” UM7403 asked, “Yes. What does he want?” CUELLO-REYNOSO replied, “I sent it to you. Two greens and one red.” UM7403 acknowledged. I believe that during this exchange, UM7403 told CUELLO-REYNOSO that he did not like the location of a drug sale CUELLO-REYNOSO had arranged because there were too many other people in the area. I believe that he then told CUELLO-REYNOSO that he did not have the drugs ready for the customer when the customer got into his car, and that CUELLO-REYNOSO chided UM7403,



telling him that because they were “selling drugs,” UM7403 had to be ready when he arrived at a transaction in order to do the deal quickly and avoid law enforcement detection. I believe that CUELLO-REYNOSO then told UM7403 that the customer wanted two grams of crack cocaine (“Two greens”) and one gram of fentanyl (“one red”).

16. CUELLO-REYNOSO also boasted about the scale of his drug distribution organization. For example, on March 29, 2023, while CUELLO-REYNOSO was using Target Telephone #1 to attempt to reestablish a drug business relationship with M.S.,<sup>1</sup> who was using telephone number (508) 815-7587, CUELLO-REYNOSO texted M.S., “Papi is my Sonny I’m my way to the cape now I want to give you 10g.” At 8:31 p.m., M.S. replied, “Yo sorry I was sleeping.” That evening, M.S. told CUELLO-REYNOSO via text message that he did not want to “take [the] ride” to Brockton at that time. He agreed to call CUELLO-REYNOSO the following day. On March 31, 2023, at approximately 3:00 p.m., M.S. texted CUELLO-REYNOSO, “Yo listen I’m not taking that ride no more I don’t know what phone ur using but if u want my bizz u gotta come out here cuz I’m getting it at my door for 300 no ride.” M.S. then texted, “Getting 4 up front so match or udk.” Over the course of the day, CUELLO-REYNOSO tried to contact M.S. unsuccessfully. At 10:17 p.m., CUELLO-REYNOSO texted M.S. from Target Telephone #1, “Why you acting like that,” “Bro,” I’m rich bro,” “I sale 15 thousand,” “A day,” “I’m no hurry for money,” “I try to give you,” “What I have now.” M.S. replied, “It’s cool no worries the only way it’s gonna work is if u come down here. Prov is like 2 hrs from me Brockton is like 45 from me u wanna get with me come to my crib get with me I don’t let nobody come to my spot but if u wanna get me back come get with me.”

---

<sup>1</sup> The male’s name is known to me, but he is referred to here by his initials as federal charges are not being sought against him at this time. I will similarly refer to other individuals against whom charges are not sought at this time by their initials. I also know the names of these individuals.

17. I believe that during this exchange, M.S. told CUELLO-REYNOSO that he would not drive to Boston (or Providence or Brockton) to obtain drugs from CUELLO-REYNOSO. I believe that M.S. said that if CUELLO-REYNOSO wanted him back as a customer, CUELLO-REYNOSO would have to deliver the drugs to M.S.'s residence ("my crib"). I believe that CUELLO-REYNOSO became frustrated that M.S. would not respond to him and told M.S. that he was rich and sold \$15,000's worth of drugs a day ("I sale 15 thousand," "A day"). I believe that M.S. repeated that if CUELLO-REYNOSO wanted to sell drugs to him, CUELLO-REYNOSO would have to deliver the drugs to M.S.'s location (which was on Cape Cod).

18. That night, at 10:23 p.m., CUELLO-REYNOSO used Target Telephone #1 to call M.S. During the call, M.S. said, "I'm down here on the Cape stuck, man. I'm stuck." CUELLO-REYNOSO said, "But yeah, you do too many thing. Like, you, come on bro! You know why I call you? Because I know you for a long time, and I have good shit. But I am not hurting for money. I have more than 200 customers, buddy." M.S. replied, "I understand that, bro." CUELLO-REYNOSO said, "I sell 15, 20,000 a day, bro." CUELLO-REYNOSO then chastised M.S. for "fucking ignoring the phone all the time." M.S. repeated, "Listen, if you want to put me back on. The only way I could do it is if you come out here. It's the only way I can do it. I gotta get my money back up, bro. Like!" CUELLO-REYNOSO said, "No, bro. I no go to the Cape. If you want, I'll meet you closer. Not Brockton, but other town. But Cape is too hot. White people is better, but Spanish people very hot." Ultimately, M.S. said he would check with his "girl" about meeting halfway. Minutes later, M.S. texted Target Telephone #1 and said, "Yo it's to late tonight let's make it for tomm." After they spoke briefly again, M.S. texted CUELLO-REYNOSO, "Yo call me when u get up in the morn I'll shoot u the addy."

19. I believe that during this exchange, M.S. stated that he was on Cape Cod, and that it was difficult for him to drive to meet with CUELLO-REYNOSO. I believe that CUELLO-REYNOSO stated that he had 200 drug customers and that he did \$15,000 or \$20,000's worth of drug business per day ("I sell 15, 20,000 a day"). I believe that M.S. repeated that he wanted CUELLO-REYNOSO to deliver drugs to him on Cape Cod ("The only way I could do it is if you come out here."). I believe that CUELLO-REYNOSO expressed concern about going to Cape Cod because there was a heavy police presence there ("Cape is too hot.") I believe that CUELLO-REYNOSO specifically said that for Hispanic people, in particular, there was a high risk of police detection on Cape Cod ("White people is better, but Spanish people very hot."). I believe that eventually, CUELLO-REYNOSO agreed to take drugs to M.S. on Cape Cod, and that M.S. said he would provide the address in the morning.

20. CUELLO-REYNOSO was also intercepted at times discussing drug proceeds accumulated at a stash apartment used by the DTO. For example, on November 20, 2023, at 12:44 a.m., CUELLO-REYNOSO used telephone number (857) 576-7922 to text VIZCAINO at telephone number (857) 395-2441 ("Target Telephone #7"),<sup>2</sup> "Cash," "In dollars," "How much is there." VIZCAINO replied via text message from Target Telephone #7, "14,369 total." CUELLO-REYNOSO then texted, "Are they there," "The 1900," "And change from yesterday." VIZCAINO replied via text message from Target Telephone #7, "No," "I grabbed out of those thousand and change to pay boli," "Today," 1800," "I gave boli from that." VIZCAINO continued to text, "There are 149 left from last night." CUELLO-REYNOSO acknowledged, and

---

<sup>2</sup> Multiple telephone numbers were intercepted pursuant to authorization for "Target Telephone #7," because VIZCAINO changed the telephone number assigned to the device for Target Telephone #7 during the interception period.

VIZCAINO texted, “Should I bring it to you or leave it here.” CUELLO-REYNOSO replied, “Take it that’s cool,” “So you can bring it,” “To the P,” “Later.”

21. I believe that during this exchange, CUELLO-REYNOSO inquired about drug proceeds on hand at the stash location maintained by VIZCAINO. I believe that VIZCAINO stated that he had \$14,369 in drug proceeds. I believe that CUELLO-REYNOSO asked whether the total included \$1,900 from the previous day. I believe that VIZCAINO stated that he had paid \$1,800 from the \$1,900 to “Boli” (YEIRON), a distributor for CUELLO-REYNOSO. I believe that CUELLO-REYNOSO then directed VIZCAINO to talk the cash to 242 Adelaide Avenue in Providence.

22. Additional intercepted and recorded communications involving CUELLO-REYNOSO are described below.

23. On August 25, 2023, CUELLO-REYNOSO was stopped by Boston Police for failure to stop at a stop sign. Officers observed two baggies of suspected crack cocaine in plain view in the car and seized them. Officers also seized \$2,003 from the center console of the car.

Yordania ABEL RIVERA a/k/a “Mommy”

24. ABEL RIVERA is CUELLO-REYNOSO’s paramour. Between October 2022 and late December 2022, when CUELLO-REYNOSO was detained on state drug and firearms charges, ABEL RIVERA operated the drug customer telephone. As set forth in Exhibit A, she coordinated distribution of fentanyl to the UC on three occasions. Precise location information for the customer telephone confirmed that ABEL RIVERA was holding the phone, and during recorded jail calls with CUELLO-REYNOSO, ABEL RIVERA confirmed that she was operating the customer telephone during CUELLO-REYNOSO’s detention.

25. Specifically, for example, on October 27, 2022, at 7:12 p.m., CUELLO-REYNOSO and ABEL RIVERA spoke during a recorded jail call. ABEL RIVERA complained about how busy she was, saying, “While you’re in there, I’ll help you however I can.” She went on to say that she was getting home at 1:00 in the morning, and that she had asthma “with all this stuff,” referring to drugs she was processing. She further elaborated that she had picked up an SUV that had been towed by police, picked up a car, and “fixed all the stuff,” referring to processing drugs for distribution. She also said that she was “tying,” referring to bagging drugs for distribution, and “picking up the phone here.” She and CUELLO-REYNOSO then discussed that ABEL RIVERA was at “Gordo’s” aunt’s residence, referring to SOTO-TEJEDA’s aunt’s home, and said, “We’re all doing our part here. He’s on the other side with the truckers, and I’m with the clients,” referring to the fact that SOTO-TEJEDA was operating the runner dispatch telephone while she operated the customer order telephone. ABEL RIVERA continued to say that SOTO-TEJEDA had to communicate with the distributors because CUELLO-REYNOSO would not give her the passcode to the telephone he used to communicate with them, and she did not know their telephone numbers. She further stated that things had been very busy, and that she had to “come in and give them a hand,” because she didn’t want to “let things get disorganized.” She also stated that she had to “put everything to the right number. To ensure that everything is good every day,” referring to keeping records of sales and proceeds collected to balance the accounts of the DTO and ensure that the correct amount of drug proceeds was collected from each distributor every day.

26. ABEL RIVERA also helped launder drug proceeds of the target DTO. She deposited cash into her bank accounts and then used that money to pay for rental cars – which I know, based on the investigation, were frequently used by distributors for the organization – and pay for a storage unit, among other expenses.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]







■ [REDACTED]

■ [REDACTED]

[REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

■ [REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

[REDACTED]



Jorge VIZCAINO Vizcaino a/k/a Yeison VIZCAINO Vizcaino a/k/a “Jason” a/k/a “Libreta”

61. VIZCAINO was until approximately May 6, 2024, a distributor working on behalf of the target DTO. As set forth in Exhibit A, VIZCAINO distributed fentanyl to the UC on March 29, 2022; April 14, 2022; May 25, 2022; and April 23, 2024, in transactions arranged by CUELLO-REYNOSO. From at least October 2023 until at least December 2023, VIZCAINO operated a drug stash location for the target DTO, preparing drugs for distribution and supplying distributors working on behalf of the DTO. In November 2023, investigators seized 1.4 kilograms of fentanyl from VIZCAINO, as described below. On about May 6, 2024, VIZCAINO stopped working for CUELLO-REYNOSO and began operating his own drug distribution organization, with TEJEDA-SOTO delivering drugs on his behalf.

62. As set forth in Exhibit B, investigators intercepted VIZCAINO’s telephones in October, November, and December 2023, and in May and June 2024. VIZCAINO was intercepted extensively discussing his work on behalf of the DTO. Representative interceptions are set forth below.

*On November 9, 2023, VIZCAINO Used Target Telephone #7  
to Discuss Processing Drugs for Distribution.*

63. On November 9, 2023, at 6:42 p.m., agents intercepted a call over Target Telephone #7 during which VIZCAINO spoke with JIMENEZ, who was using telephone number (781) 801-7693. During the call, VIZCAINO stated that his neck was hurting. JIMENEZ asked, “How long do you work?” VIZCAINO replied, “It depends. I make a lot to last for a couple of days.” VIZCAINO explained that the process of doing so caused his neck to hurt because it involved “bagging and cutting.” JIMENEZ said, “That’s stressful,” and VIZCAINO said, “I have to keep looking down while doing that, so that is also why my neck hurts.” VIZCAINO explained, “I

make a total of 300 grams of the green stuff in 0.5 lines at a time, so two green ones are equal to 1 gram. I have to make 300 grams five lines at a time. Then I have to paint it, double bag it, continue to cut it, bag it, and so on.” JIMENEZ said, “That is a lot of work. You also have to be careful with the bags, in case we have to swallow a ball.” VIZCAINO acknowledged and said, “I have to be very careful and make sure that each ball is super tight and that the bag is properly wrapped because no one knows which ball will end up being swallowed.” JIMENEZ said, “You can easily miss something since you have so many things to take care of.” VIZCAINO agreed, saying, “I try to be careful, but I am only human.” Later in the call, which lasted over thirty minutes, VIZCAINO stated, “Those people are such rats. Think about the stuff those people consume on a daily basis. It’s tough. I have been feeling nauseous for days because of the smell of that stuff in there. I get dizzy a lot while preparing that stuff. Think about the effect on the bodies of the people who take that every day.” JIMENEZ agreed.

64. I believe that during this call, VIZCAINO told JIMENEZ about preparing drugs for distribution. I believe that VIZCAINO said that he had processed a large quantity of drugs, and that his neck was bothering him from looking down for so long. I believe that VIZCAINO said that he had packaged 300 grams of crack cocaine (“green stuff”) in half-gram packages and 300 grams of cocaine in 5-gram packages (“five lines at a time”). I believe that VIZCAINO made reference to marking the drugs by color to indicate what type of drug they are (“paint it”) and packaging the drugs (“double bag it”). I believe that JIMENEZ and VIZCAINO discussed the fact that the drugs had to be tightly packaged into bundles to allow distributors to swallow the drugs if stopped by police. I believe that VIZCAINO also made reference to processing fentanyl for distribution, stating that the drugs made him dizzy and nauseous when he processed them.

*On November 17, 2023, VIZCAINO Used Target Telephone #7 to Discuss Drugs that He Was to Process for Distribution.*

65. On November 17, 2023, at 12:52 p.m., agents intercepted a call over Target Telephone #7 during which VIZCAINO spoke with CUELLO-REYNOSO, who was using telephone number (857) 576-7922. During the call, VIZCAINO said, “Pelo is active. Should I head down?” CUELLO-REYNOSO affirmed and said, “Start heading that way.” VIZCAINO asked, “Am I supposed to bag what the guy brought last night?” CUELLO-REYNOSO affirmed and said, “Leave it there.” CUELLO-REYNOSO then said, “Bring down a small box, just in case, and leave everything else there.” VIZCAINO acknowledged.

66. I believe that during this call, VIZCAINO asked whether he should go to the stash location at 242 Adelaide Avenue in Providence, Rhode Island. I believe that he asked if he should package drugs at that location for distribution (“Am I supposed to bag what the guy brought last night?”). I believe that CUELLO-REYNOSO affirmed and instructed VIZCAINO to leave most of the drugs in Providence, but to take a small quantity of the drugs with him when he left Providence.

67. At 1:08 p.m. that day, VIZCAINO texted CUELLO-REYNOSO from Target Telephone #7, “Should I bring you the money.” CUELLO-REYNOSO replied, “No,” followed by, “Leave it there.” VIZCAINO then texted CUELLO-REYNOSO, “Alright boss.”

68. I believe that during this exchange, VIZCAINO asked whether he should take drug proceeds from the stash location in Boston to the stash location in Providence when he went. I believe that CUELLO-REYNOSO (“boss”) negated.

69. At 2:59 p.m. that day, CUELLO-REYNOSO texted Target Telephone #7, “Bring,” “The little phone I left,” “If you haven’t left.” VIZCAINO replied from Target Telephone #7, “Alright.”

70. I believe that during this exchange, CUELLO-REYNOSO instructed VIZCAINO to take a second telephone used by CUELLO-REYNOSO down to the Providence stash location when he went.

71. Based on static surveillance, at approximately 4:44 p.m., agents observed a male wearing black sweatpants and a red sweatshirt and carrying a white paper shopping bag exit 1 Fairland Street in Roxbury, which was used by the DTO as a stash location. Precise location data for Target Telephone #7 then showed that VIZCAINO was traveling to Providence. Agents were conducting surveillance in the area of 242 Adelaide Avenue in Providence. At approximately 6:30 p.m. that evening, a law enforcement agent observed a car used regularly by TEJEDA-SOTO, arrive on Adelaide Avenue. The car pulled to the side of the road just past 242 Adelaide Avenue, and a male wearing black sweatpants and a red sweatshirt and carrying a white paper shopping bag exited the car and walked up the driveway of 242 Adelaide Avenue, to the rear of the building. Agents could not see where or if the male entered 242 Adelaide Avenue. Agents also could not identify the male based on their vantage point, but based on intercepted communications and subsequent surveillance, I believe the male was VIZCAINO.

72. At 7:00 p.m. that night, VIZCAINO called CUELLO-REYNOSO from Target Telephone #7. The call was intercepted. During the call, VIZCAINO asked, "Should I start?" CUELLO-REYNOSO replied, "Uh huh. It's in the back room, in the last one." VIZCAINO acknowledged, and CUELLO-REYNOSO said, "In the small room that is there." VIZCAINO again acknowledged. CUELLO-REYNOSO instructed, "Put 100 cut for each 50." VIZCAINO said, "Okay," and CUELLO-REYNOSO repeated, "To each 50 points, add 100 of curtain."

73. At 7:03 p.m. that night, VIZCAINO called CUELLO-REYNOSO from Target Telephone #7. The call was intercepted. During the call, VIZCAINO asked, "A whole one that's

here, right?" CUELLO REYNOSO affirmed, and VIZCAINO said, "Okay." CUELLO-REYNOSO then said, "To break the next package. So much breaking. Break it!" VIZCAINO's reply was unintelligible, and CUELLO-REYNOSO said, "Okay."

74. At 7:52 p.m., CUELLO-REYNOSO texted Target Telephone #7, "Weigh it on the small one." He then called Target Telephone #7. During the call, which was intercepted, CUELLO-REYNOSO asked, "Are you weighing it in another cup, right? The other scale." VIZCAINO replied, "The big one, the red scale." CUELLO-REYNOSO said, "No, that doesn't work. It's not accurate. You have to weigh it on the small." VIZCAINO said, "Okay, I already have two and a half there." CUELLO-REYNOSO said, "Weigh it before you keep going. To see if it's good." VIZCAINO asked, "What I have prepared? Should I weigh it, right?" CUELLO-REYNOSO affirmed.

75. I believe, based on physical surveillance and precise location data for Target Telephone #7, that during these telephone calls, VIZCAINO was inside of 242 Adelaide Avenue in Providence, Rhode Island. I believe that during the first of these calls, CUELLO-REYNOSO gave VIZCAINO instructions regarding processing and packaging drugs for distribution inside of 242 Adelaide Avenue. I believe that CUELLO-REYNOSO first directed VIZCAINO to the drugs ("In the small room that is there"), and that he then instructed VIZCAINO to dilute the drugs at a ratio of 2:1 cutting agent to drugs. I further believe that during the second call, VIZCAINO inquired about the fact that there was a kilogram of drugs inside of 242 Adelaide ("A whole one"), and that CUELLO-REYNOSO instructed VIZCAINO to break drugs from the kilogram to process them for redistribution. I believe that during the third of these phone calls, CUELLO-REYNOSO gave VIZCAINO instructions on weighing the drugs, directing him to use a particular scale because another was inaccurate.

*On November 27, 2023, Police Seized 1.4 Kilograms of Fentanyl that VIZCAINO Was Transporting from Providence to Roxbury.*

76. On November 26, 2023, at 11:20 p.m., TEJEDA-SOTO called VIZCAINO on Target Telephone #7 using telephone number (857) 506-1264. During part of the call, VIZCAINO asked, “What about the Uber errand?” TEJEDA-SOTO said, “I just need to order it for you. I need to deposit the money. After I bring you this and the number, I will deposit the money in the card at the ATM. But is one for today and another one for tomorrow morning, honey?” VIZCAINO replied, “Regarding the one of tomorrow, I’m going to tell him to request it for me.” TEJEDA-SOTO said, “So you know. You are not going to have money in the card. I’m just going to deposit for today’s. But, darling! I can drive safely down there. And you can store that there, and we will pray to God! And we’ll do it. And it’s raining, and they are not bothering around.” VIZCAINO then asked, “Do you think they are just two cans?” TEJEDA-SOTO said, “Whatever the amount is, we can put them in T-shirts. And we will place them in the front.” VIZCAINO then said, “They don’t fit in the front. Don’t you understand that is a lot of things?” TEJEDA-SOTO asked, “Like, how many?” VIZCAINO replied, “A lot of things. I’ll put them in a backpack.” TEJEDA-SOTO then suggested, “And there’s also the thing in the tire, but okay, whatever. As you like.” VIZCAINO asked, “What tire?” TEJEDA-SOTO then said, “In the back, you know I have the tire. That tire in the trunk that you could accommodate that there. And I am also going to bring laundry in the hamper. I have to stop by the gas station first.” VIZCAINO then complained about “driving so much and spending so much in gas.” TEJEDA-SOTO pointed out that an Uber would cost “100 bucks per day or more.” VIZCAINO then suggested, “Yes, but let’s coordinate better and avoid to go back and forth.”

77. I believe that during this call, VIZCAINO and TEJEDA-SOTO discussed the fact that VIZCAINO needed an Uber to take him to and from 242 Adelaide Avenue the following day.



I believe that VIZCAINO stated that he was going to ask CUELLO-REYNOSO to order (and pay for) the Uber. I believe that when TEJEDA-SOTO offered to drive VIZCAINO, VIZCAINO demurred, stating that he would be transporting a large quantity of drugs (“Do you think they are just two cans?”). I believe that TEJEDA-SOTO suggested several ways to hide the drugs during the trip back to Boston (“we can put them in T-shirts”; “we will place them in the front”; there’s also the thing in the tire”; “I am also going to bring laundry in the hamper”). I believe that VIZCAINO stated that the drugs would not fit in the engine compartment of the car (“They don’t fit in the front”). I believe that they then discussed the need to stop spending some much money traveling back and forth to Providence.

78. On the morning of November 27, 2023, VIZCAINO ceased using telephone number (857) 395-2441 (previously assigned to Target Telephone #7). That day, agents identified telephone number (857) 506-1264, which had been used by TEJEDA-SOTO on the night of November 26, 2023, as described above, as a replacement for telephone number (857) 395-2441. On November 27, 2023, the IMEI assigned to telephone number (857) 506-1264 changed to IMEI 354917092365714, that is, to Target Telephone #7. Agents contacted T-Mobile to initiate interception over (857) 506-1264 (the new Target Telephone #7) pursuant to the then-effective wiretap authorization order.

79. In the meantime, agents conducting surveillance in the area of 242 Adelaide Avenue observed VIZCAINO walk from the rear of the residence carrying a black bag at approximately 1:39 p.m. VIZCAINO walked down Adelaide Avenue to Elmwood Avenue, and there he entered a grey Nissan Rogue with Rhode Island license plates that appeared to be a ride-share vehicle. Agents maintained surveillance of the Rogue and requested that the MSP stop the Rogue after it entered Massachusetts. At approximately 2:07 p.m., a Trooper with the MSP

initiated a motor vehicle stop of the Rogue for a traffic violation. VIZCAINO – who identified himself as Jorge VIZCAINO but stated that he did not have identification with him<sup>5</sup> – was seated in the rear passenger compartment of the car. There was a black bag on the seat next to him. The Trooper inquired about the bag, and VIZCAINO disclaimed ownership of it. The Uber driver stated that VIZCAINO had gotten into the car with the bag. After asking if he could open it and receiving affirmative responses from VIZCAINO and the Uber driver, the Trooper seized and opened the bag, which contained three plastic Ziploc bags, all containing an off-white powder. Two bags were marked on the outside with “500 gm,” and one bag was marked with “398 gm.” The powder was subsequently tested at the DEA Northeast Laboratory. It tested positive for fentanyl and weighed 1.4 kilograms.

80. At approximately 11:07 a.m., agents intercepted a text message over the new Target Telephone #7. At approximately 2:19 p.m., interception of voice calls resumed. At that time, agents intercepted a call from TEJEDA-SOTO, who was using telephone number (857) 693-3674, to VIZCAINO. During the call, VIZCAINO said, “I am arrested. They stopped me on the highway.” TEJEDA-SOTO said, “I don’t have that guy’s number. Did they find everything?” VIZCAINO said, “I had something on me.” TEJEDA-SOTO asked, “Did they stop you while you were in the Uber?” VIZCAINO affirmed. TEJEDA-SOTO asked, “Did you have a lot of food on you?” VIZCAINO again affirmed and said, “I’m on the highway.” TEJEDA-SOTO asked, “Did they see the stuff?” VIZCAINO repeated, “Yes, they saw it.” TEJEDA-SOTO then advised, “Say that it’s not yours.” VIZCAINO said, “They found that there and are asking me if it’s my stuff.” TEJEDA-SOTO told VIZCAINO she loved him and to trust in God.

---

<sup>5</sup> A Trooper familiar with VIZCAINO’s appearance and tattoos was present at the scene of the stop and confirmed that VIZCAINO was the person present in the Rogue stopped by the MSP.

81. I believe that during this call, VIZCAINO related to TEJEDA-SOTO that he had been stopped by police with drugs in his possession. I believe that TEJEDA-SOTO asked if they had found the drugs and asked how much drugs VIZCAINO had with him (“Did you have a lot of food on you?”). I believe that VIZCAINO did not tell her the quantity of the drugs but said that police had found the drugs and asked if they were his.

82. At 2:25 p.m., VIZCAINO received a call over Target Telephone #7 from CUELLO-REYNOSO, who was using telephone number (857) 576-7922. The call was intercepted. During the call, VIZCAINO told CUELLO-REYNOSO, “A detective has me here in the Uber. They found something in the Uber. He took the bag with him, and he asked me if that belonged to me. I told him, ‘No, I got in the car without anything on me.’ He said he was going to take that and they were going to leave me in the Uber and they will contact me later on.” CUELLO-REYNOSO said, “What was that?” and VIZCAINO replied, “They are going to take the thing they found in the car. They were asking me a lot of questions, and that they are going to let me go but will contact me.” CUELLO-REYNOSO, who appeared to have trouble hearing asked, “With me?” and VIZCAINO said, “With me, with me! That’s up to you if you would like to contact them. I don’t know after sending messages. They took pictures of the phone.” VIZCAINO then proceeded to tell CUELLO-REYNOSO that “they” had taken pictures of him. CUELLO-REYNOSO asked, “Do you think that started since you left here?” VIZCAINO replied, “The truth is that I don’t know.” VIZCAINO then told CUELLO-REYNOSO that the Uber driver did not want to continue driving him, and that “the one from the State” was “going to bring [him] up around where [unintelligible] lives.” VIZCAINO concluded, “Something weird is going on.”

83. I believe that during this call, VIZCAINO told CUELLO-REYNOSO about the fact that police had stopped him. I believe that the call occurred while VIZCAINO was still on the side

of the road with police. I believe that VIZCAINO related that police had seized the drugs (“They found something in the Uber. He took the bag with him”). I believe that VIZCAINO told CUELLO-REYNOSO that police had taken pictures of his phone and of him, and described generally what happened during the stop.

84. Over the course of the afternoon, VIZCAINO continued to discuss the stop with CUELLO-REYNOSO, TEJEDA-SOTO, YEIRON, and MARIELA, who is CUELLO-REYNOSO’s sister, with whom VIZCAINO was romantically involved. When speaking to TEJEDA-SOTO, VIZCAINO explicitly stated that he was “bringing 1,300 grams of that shit” when he “was pulled over,” and that “they found the stuff there in the back seat where [he] was seated,” which I believe was a reference to the 1,395 grams of drugs seized from the Uber. When speaking with YEIRON, VIZCAINO referenced “a kilo and something, about 1,400 grams,” which I also believe was a reference to the drugs seized that day. In a subsequent call with YEIRON, VIZCAINO stated that he “had fentanyl on [him]” and elaborated, “That is the dangerous one because it kills people.” I believe that VIZCAINO was acknowledging that the drugs seized by police were fentanyl. By 3:03 p.m., CUELLO-REYNOSO had changed his telephone number to (848) 318-9905, which he used to arrange for an associate to pick up VIZCAINO at a Wendy’s in Attleboro. During an intercepted call over Target Telephone #7 at 3:03 p.m., CUELLO-REYNOSO (who was using (848) 318-9905) told VIZCAINO, “So weird that I don’t even know what to think. I have to get together with you and talk in person. We can’t talk over the phone too much. When you change the chip and stuff.” VIZCAINO replied, “I will change the phone and everything.” Outgoing activity over Target Telephone #7 stopped at 8:17 p.m. that night.

85. Based on the foregoing, I believe that VIZCAINO worked for the DTO maintaining a stash location and distributing drugs, including fentanyl.

Rafael CONCEPCION a/k/a “Menor”

86. CONCEPCION was a drug distributor for the target DTO. He was intercepted receiving instructions from CUELLO-REYNOSO regarding making drug deliveries. In addition, beginning in May 2024, CONCEPCION was intercepted agreeing to provide VIZCAINO with fentanyl and working with VIZCAINO to develop an independent drug dispatch service. Representative interceptions are set forth below.

*On August 2, 2023, CUELLO-REYNOSO Asked CONCEPCION to Deliver Fentanyl.*

87. On August 2, 2023, at 9:30 p.m., agents intercepted a call over Target Telephone #3 during which CUELLO-REYNOSO asked CONCEPCION, who was using telephone number (857) 381-6691, “Do you have some on you?” CONCEPCION said, “Yes, I have some here.” CUELLO-REYNOSO then instructed, “Oh, then take care of the woman on the street. I’m going to send it to you. She wants six big.” CONCEPCION agreed. I believe that during this call, CUELLO-REYNOSO asked CONCEPCION if he had drugs with him (“some on you”), and that when CONCEPCION affirmed, CUELLO-REYNOSO asked him to deliver 15 grams (“six big”) of fentanyl to a customer who was nearby.

*On May 1, 2024, VIZCAINO Obtained Fentanyl from CONCEPCION  
in Anticipation of Starting to Distribute Drugs on His Own.*

88. On May 1, 2024, at 11:04 p.m., agents intercepted a call over telephone number (617) 934-9912 (“Target Telephone #9”)<sup>6</sup> during which VIZCAINO spoke with CONCEPCION, who was using telephone number (857) 391-0942. During the call, VIZCAINO and

---

<sup>6</sup> Investigators intercepted multiple telephone numbers pursuant to the authorizations to intercept Target Telephone #9 because VIZCAINO changed the telephone number assigned to the device for Target Telephone #9 during the authorization periods.

CONCEPCION discussed meeting, and VIZCAINO said, "I'm going to tell her to bring me, to bring me a few pesos, and I will see how much there is. When you bring, when you bring, let me calculate. I'm going to calculate 25. How much, tell me how much you will give it to me for." CONCEPCION said, "At 35, how much would that be?" VIZCAINO asked, "At 35?" and CONCEPCION affirmed. VIZCAINO then said, "Oh, so you're going to give it to me at the same price you give it to everyone?" CONCEPCION said, "No! I'm telling you how much it costs." VIZCAINO said, "Let me see, 25, 25 times, it's 875." CONCEPCION said, "Damn! Give me . . . 600 pesos." VIZCAINO said, "I'm going to kill you." CONCEPCION said he needed 700 for rent. VIZCAINO said, "I'm going to give you 500, buddy." CONCEPCION repeated that he needed 700 for rent. VIZCAINO replied, "Listen to that, buddy. I'm going to give you 500 because I had 1,200 earlier, and I bought a coperi, and now I have 550. I'll give you 500." CONCEPCION said, "Oh, I also grabbed a big blue of the coperi." They continued to negotiate price, settling on 600. VIZCAINO said, "Alright! I'll give you the 600, I'll give you the 600. Let me call her now, so that when I'm close by, she can hand it to me, and I'll tell her that we'll talk later. That I will let her know when to come get me." CONCEPCION agreed.

89. I believe that during this call, VIZCAINO inquired with CONCEPCION about purchasing 25 grams of fentanyl ("25") from him. I believe that CONCEPCION stated that he normally charged \$35 per gram ("At 35"), but that he would sell the drugs to VIZCAINO for \$600 instead ("600 pesos"). I believe that VIZCAINO tried to negotiate a lower price but ultimately agreed to pay the \$600 for 25 grams of fentanyl. Based on subsequent intercepted calls, I believe the transaction took place later that day.

*On May 2, 2024, CONCEPCION and VIZCAINO Discussed a Fentanyl Customer.*

90. On May 2, 2024, at 10:27 a.m., agents intercepted a call over Target Telephone #9 during which VIZCAINO spoke with CONCEPCION, who was using telephone number (857) 391-0942. During the call, CONCEPCION said, “The woman from yesterday hit me up.” VIZCAINO asked, “Did she tell you the stuff was good?” CONCEPCION affirmed and added, “She asked if I could go by again and asked what time I could swing by.” VIZCAINO asked if CONCEPCION was going to hold on to her number or if he was going to let VIZCAINO use it until CONCEPCION was active. VIZCAINO then offered to give CONCEPCION “perico.” They then discussed how they could work together.

91. I believe that during this call, CONCEPCION told VIZCAINO that a drug customer to whom he had distributed the same fentanyl he had sold VIZCAINO the day prior had reported that she was happy with the quality of the drugs. I believe that VIZCAINO then offered to sell CONCEPCION cocaine (“perico”).

92. That morning, at 11:00 a.m., during an intercepted call over Target Telephone #9, VIZCAINO spoke again with CONCEPCION, who was using telephone number (857) 391-0942. During the call, CONCEPCION said, “The woman wants to grab one today, but she doesn’t have money to pay for it until tomorrow.” VIZCAINO said, “It’s fine to give it to her.” At 11:44 a.m., VIZCAINO and CONCEPCION spoke again during an intercepted call over Target Telephone #9. CONCEPCION said, “Oh, the woman is asking me to go.” VIZCAINO said, “Which woman? Oh, okay, okay.” CONCEPCION then said, “She has the same address, the same address, in Roslindale.” VIZCAINO said he had forgotten, and CONCEPCION said to let him know how long so he could let her know. At 11:53 a.m., VIZCAINO texted CONCEPCION from Target

Telephone #9, “28 min.” At 12:35 p.m., CONCEPCION texted VIZCAINO, “Did she arrive,” and at 12:43 p.m., CONCEPCION texted VIZCAINO, “The woman is outside.”

93. I believe that during this exchange, CONCEPCION told VIZCAINO that the fentanyl customer they had previously discussed wanted to receive “one” of a quantity of fentanyl but could not pay for the drugs until the following day. I believe that VIZCAINO agreed to supply the drugs but then forgot to deliver them. I believe that when prompted by CONCEPCION to deliver the drugs, VIZCAINO told CONCEPCION that he would arrive to deliver the fentanyl in 28 minutes. I believe that CONCEPCION then texted VIZCAINO to check on his progress. Based on the lack of subsequent communications, I believe that the transaction occurred.

Alinson Joel ORTIZ ARIAS

94. ORTIZ ARIAS was a distributor on behalf of the target DTO. As set forth in paragraphs 29-39 above, on March 7, 2023, law enforcement seized approximately 30 grams of fentanyl and 10 grams of cocaine from ORTIZ ARIAS after he was stopped by police. [REDACTED] was intercepted discussing the stop over Target Telephone #1.

95. Thereafter, during the interception of telephone number (505) 417-5450 (“Target Telephone #3”), ORTIZ ARIAS was in near-constant contact with CUELLO-REYNOSO, receiving instructions about pending drug transactions. Representative interceptions are set forth below.

96. On August 2, 2023, at 9:18 a.m., CUELLO-REYNOSO spoke with ORTIZ ARIAS. At the beginning of the conversation, CUELLO-REYNOSO could be heard talking on another phone, saying, “I’ll give you one more. Send me the address.” ORTIZ ARIAS then said, “I’m here at 637.” CUELLO-REYNOSO said, “Okay, two big.” Based on my training and experience, as well as my familiarity with this investigation, I believe that during this exchange, CUELLO-



REYNOSO first spoke with a drug customer about an intended sale, and then directed ORTIZ ARIAS to give another customer two 2.5-gram quantities (“two big”) of fentanyl.

97. At 11:17 a.m., CUELLO-REYNOSO spoke with ORTIZ ARIAS. During the conversation, CUELLO-REYNOSO said, “The person is at 7.” ORTIZ ARIAS said, “You sent 190.” CUELLO-REYNOSO then said, “Two greens and one red.” ORTIZ ARIAS said, “I’ll be there in one minute.” CUELLO-REYNOSO said, “Be careful, the guy is a thief.” ORTIZ ARIAS replied, “Don’t worry, I can hit him in the butt with what I have there.” Two minutes later, ORTIZ ARIAS said, “I am at the place, number 202.” CUELLO-REYNOSO said, “The guy now wants two reds and two greens for 130.” Based on my training and experience, as well as my familiarity with this investigation, I believe that during this exchange, CUELLO-REYNOSO directed ORTIZ ARIAS to distribute one gram of crack cocaine (“Two greens”) and one gram of fentanyl (“one red”) to a drug customer, who CUELLO-REYNOSO described as a thief. I believe that prior to the transaction, the customer changed his order to two grams of crack cocaine and two grams of fentanyl for \$130.

98. At 10:14 p.m., ORTIZ ARIAS told CUELLO-REYNOSO, “I’m there.” CUELLO-REYNOSO told ORTIZ ARIAS, “Give him two big, and you are done.” CUELLO-REYNOSO then said, “There is one more, the old man that talks a lot.” Based on my training and experience, as well as my familiarity with this investigation, I believe that during this exchange, CUELLO-REYNOSO directed ORTIZ ARIAS to distribute two 2.5-gram quantities (“two big”) to a drug customer, before seeing one more customer for the night.

99. At 11:19 p.m., CUELLO-REYNOSO told ORTIZ ARIAS, “It is 2,750. The 80 are already deducted.” ORTIZ ARIAS said, “I’m parked close by,” and CUELLO-REYNOSO said, “I am close by and will send you the key with the buddy.” At 11:49 p.m., ORTIZ ARIAS asked,

“Did you calculate?” CUELLO-REYNOSO said, “I’m going to do it again while the buddy walks there.” ORTIZ ARIAS said, “It’s 2,450.” CUELLO-REYNOSO said, “Come on, man.” ORTIZ ARIAS said, “That’s what my wife calculated, too, man.” CUELLO-REYNOSO acknowledged. At 11:59 p.m., CUELLO-REYNOSO told ORTIZ ARIAS, “2,750 minus 80.” ORTIZ ARIAS’s response was unintelligible. CUELLO-REYNOSO then said, “Buddy, everything is included. I’m heading there to calculate it out with you. I’m going there. Wait there for me. I’m right here. The messages are there. It should be 2,670.” ORTIZ ARIAS said, “Now you’re talking. That is it. You were calculating more.” Based on my training and experience, as well as my familiarity with this investigation, I believe that during this exchange, CUELLO-REYNOSO and ORTIZ ARIAS discussed drug proceeds that ORTIZ ARIAS had collected that day. I believe that they initially disagreed about the calculation, but that ultimately they agreed that ORTIZ ARIAS would give an associate of CUELLO-REYNOSO (“the buddy”) \$2,670.

100. On August 11, 2023, ORTIZ ARIAS was stopped by the Massachusetts State Police for motor vehicle infractions. ORTIZ ARIAS did not have a license and was arrested. During an inventory search prior to towing and a subsequent search of ORTIZ ARIAS’s vehicle, police located approximately 48 grams of laboratory-confirmed fentanyl and 33 grams of laboratory-confirmed cocaine, some of which was in baggies marked with blue or black paint, in a tube sock inside the passenger compartment of the car. ORTIZ ARIAS stated post-*Miranda* that he was borrowing the car from a friend and did not know about the drugs.

101. On or about August 11, 2023, CUELLO-REYNOSO changed his telephone number, seemingly in response to ORTIZ ARIAS’s arrest. I believe this was because ORTIZ ARIAS was working as a distributor for the DTO at the time of his arrest.

Axel BREA BAEZ

102. BREA BAEZ worked as a drug distributor for the target DTO. On July 10, 2023, agents intercepted calls over Target Telephone #2 showing that [REDACTED] dispatched a distributor to deliver drugs to customers in Dorchester. Investigators conducting surveillance in the area observed BREA BAEZ, who was operating a white Buick Regal (the “Regal”), exit his car while it was parked on Sturbridge Street near Monson Street in Dorchester. BREA BAEZ opened the hood of the Regal, manipulated something in the front of the engine block, closed the hood, and reentered the car. A few minutes later, investigators saw BREA BAEZ meet briefly with a male identified as J.K. inside of the Regal. BREA BAEZ then left the area. Investigators following BREA BAEZ observed him park the Regal on Sanford Street in Dorchester. BREA BAEZ again exited the Regal, manipulated an item in the engine block under the hood, and then reentered the car. He then drove towards Temple Street, where he backed up the one-way street and parked on Temple Street a short distance from Sanford Street. Investigators then observed him meet briefly in the Regal with a male identified as P.B. Investigators recovered plastic baggies containing fentanyl from J.K. (3.2 grams) and P.B. (0.76 gram).

103. Officers stopped the Regal and placed BREA BAEZ under arrest. After receiving *Miranda* warnings, BREA BAEZ stated that he did not deal in drugs, that he did not know what was in the car, that it was not his car, and that it was his friend’s car. Police seized \$1,040 from his pocket and \$420 from his wallet, which was also in his pocket. Police recovered a black tube sock from under the hood of the Regal. Inside the sock, officers located 11 larger plastic bags with red markings (“big reds”); 5 smaller plastic bags with red markings (“reds”); 14 plastic bags with blue markings (“blues”); 7 plastic bags with green markings (“greens”); and 2 plastic bags with black markings (“blacks”). The drugs were sent to the State Police laboratory for testing. The

contents of the red-marked bags tested positive for fentanyl and together weighed approximately 30.7 grams. The contents of the blue, green, and black bags tested positive for cocaine and together weighed approximately 19.1 grams.

104. P.B. was intercepted over Target Telephone #2 discussing his arrest. He stated that given the circumstances of his arrest, he believed that the police were listening to Target Telephone #2 and that the DTO should change telephone numbers. The following day, CUELLO-REYNOSO changed his telephone numbers.

105. On January 11, 2024, Walpole Police stopped BREA BAEZ after observing activity consistent with drug distribution. Police seized 35 plastic baggies of fentanyl (some of which were marked with red paint), ten plastic baggies of powder cocaine (marked with blue paint), and 20 plastic baggies of crack cocaine (marked with green or black paint) in color-coded baggies from a sock in the engine compartment of the car BREA BAEZ was operating. Altogether, police seized 56.4 grams of laboratory-confirmed fentanyl and 26.3 grams of laboratory-confirmed cocaine from BREA BAEZ's car. Police also seized \$450 from BREA BAEZ's pants pocket, as well as two cellphones from the vehicle. During the stop, BREA BAEZ provided a Dominican identification in the name "Yeison Yansel Brea Villar."

106. VIZCAINO and CUELLO-REYNOSO changed telephone numbers seemingly at least in part in relation to BREA BAEZ's arrest.

Denly SOTO-TEJEDA a/k/a "Gordo"

107. SOTO-TEJEDA worked as a distributor for the target DTO. Based on recorded jail calls, as set forth in part in paragraph 25 above, he also, for a period of time, operated the drug runner dispatch telephone, instructing distributors to make deliveries. SOTO-TEJEDA was intercepted speaking with VIZCAINO about drug distribution. Representative interceptions are

set forth below. In February 2024, Norwood Police seized drugs and drug proceeds from SOTO-TEJEDA, as described below.

108. On November 22, 2023, at 10:13 a.m., agents intercepted a call over Target Telephone #7 during which SOTO-TEJEDA (who was using telephone number (646) 925-9841) spoke with VIZCAINO. During the call, VIZCAINO asked SOTO-TEJEDA if he had already “executed,” and SOTO-TEJEDA said, “I haven’t gone yet because I still have some left, so I am serving some people around Revere and Chelsea.” I believe that VIZCAINO was asking whether SOTO-TEJEDA had gone to retrieve more drugs to distribute, and that SOTO-TEJEDA said that he still had drugs left, and that he was making drug deliveries (“serving some people”) in Revere and Chelsea. SOTO-TEJEDA then stated that he had been hit by another car and had screwed his bumper back together. VIZCAINO asked whether SOTO-TEJEDA had told “the man,” referring to CUELLO-REYNOSO, and SOTO-TEJEDA affirmed.

109. That afternoon, at 12:48 p.m., SOTO-TEJEDA again spoke with VIZCAINO. The call was intercepted over Target Telephone #7. During the call, SOTO-TEJEDA asked, “Are you in the area, or should I pick it up on the other side?” VIZCAINO replied, “Take what I left for you there. I’m not there. I’m on my way up. I left it in the SUV for you.” I believe that during this call, SOTO-TEJEDA inquired with VIZCAINO, who was maintaining a drug stash location, about picking up drugs from him. I believe that VIZCAINO replied that he was not at the stash location but had left drugs for SOTO-TEJEDA in a “drop car,” meaning that VIZCAINO had left the drugs in a parked car (“the SUV”), and that SOTO-TEJEDA could retrieve the drugs from that car.

110. At 1:48 p.m. that afternoon, SOTO-TEJEDA called VIZCAINO at Target Telephone #7. During the call, SOTO-TEJEDA asked where the food was. VIZCAINO replied,

“He had another guy grab the food. Head over my way.” SOTO-TEJEDA asked, “Are you already there,” and VIZCAINO affirmed. I believe that during this exchange, SOTO-TEJEDA, who was at the drop car, asked VIZCAINO where he had left the drugs (“food”). I believe that VIZCAINO stated that CUELLO-REYNOSO had sent another distributor to pick up the drugs left in the drop car, and that SOTO-TEJEDA should go to VIZCAINO’s location (at a stash house) to retrieve more drugs.

111. In a subsequent call, at 1:55 p.m., VIZCAINO asked, “Do you have any black ones left?” SOTO-TEJEDA replied, “I don’t. I have blue ones, one big blue, five or four red, and 20 small.” VIZCAINO acknowledged. I believe that SOTO-TEJEDA told VIZCAINO that he did not have any of a particular sized back of crack cocaine (“black ones”) left, but that he had powder cocaine in two sizes (“blue ones” and “big blue”), four or five larger bags of fentanyl (“red”), and 20 smaller bags of fentanyl (“small”). At 2:10 p.m., SOTO-TEJEDA and VIZCAINO made arrangements to meet on the street near VIZCAINO’s location. After they met, VIZCAINO told SOTO-TEJEDA during an intercepted call that he had given SOTO-TEJEDA only “two black ones” because he did not have anymore. Also during a subsequent intercepted call, SOTO-TEJEDA told VIZCAINO that he had given him \$3,504. VIZCAINO replied, “I was just counting it and was going to call you once I counted it to confirm it was all correct.” I believe that VIZCAINO and SOTO-TEJEDA met for VIZCAINO to resupply SOTO-TEJEDA with drugs for distribution, and that VIZCAINO had given SOTO-TEJEDA only two of a particular sized bag of crack cocaine (along with other drugs) to sell. I further believe that SOTO-TEJEDA gave VIZCAINO \$3,504 in drug proceeds from prior sales he had made.

112. On February 20, 2024, SOTO-TEJEDA was stopped by Norwood Police after they observed activity consistent with drug distribution. Officers seized \$698 from SOTO-TEJEDA’s

pocket and 20 plastic baggies, some of which were unmarked and some of which were marked with red paint, containing a total of approximately 28 grams of laboratory-confirmed fentanyl; nine plastic baggies marked with blue paint that together contained approximately 7.4 grams of laboratory-confirmed cocaine; and 20 plastic baggies, some of which were marked with green and some of which were marked with black paint, that together contained approximately 21 grams of laboratory-confirmed cocaine from socks concealed in a hidden compartment in the steering column and in the engine compartment of the car SOTO-TEJEDA was operating. Officers also seized \$700 from the hidden compartment in the steering column.

113. VIZCAINO and CUELLO-REYNOSO changed telephone numbers seemingly as a result of SOTO-TEJEDA's arrest. I believe that was because SOTO-TEJEDA was working as a distributor for the DTO when he was arrested.

Yeiron Vizcaino Vizcaino a/k/a "Boli" ("YEIRON")

114. YEIRON is VIZCAINO's brother, and he worked as a drug distributor for the target DTO. YEIRON was intercepted receiving instructions on delivering drugs to customers of the organization. Representative interceptions, which are merely examples of numerous exchanges between YEIRON and CUELLO-REYNOSO, are set forth below.

115. On December 8, 2023, YEIRON was stopped by the Dedham Police after they observed activity consistent with drug distribution. YEIRON did not initially stop for police. When he ultimately did stop, police observed him to be putting something in his mouth and gulping water. YEIRON refused to roll down the window of his vehicle. Believing that he was swallowing drugs, police broke the window of his vehicle and removed him from the car. Police ultimately seized approximately 53.2 grams of lab-confirmed fentanyl and 22 grams of lab-confirmed cocaine from a sock behind the headlight of the car, as well as \$355 from YEIRON's person and wallet.

The drugs were packaged in plastic baggies marked with red (fentanyl) and blue and green (powder and crack cocaine), consistent with other drug seizures made from drug distributors working on behalf of CUELLO-REYNOSO during the course of this investigation. VIZCAINO was intercepted on December 8, 2023, discussing an “accident,” which I believe refers to the stop and arrest of YEIRON, and VIZCAINO changed his phone number that same day.

116. Prior to his arrest, YEIRON was intercepted receiving instructions from CUELLO-REYNOSO about delivering drugs to customers. Representative interceptions are set forth below.

117. On October 16, 2023, at 6:45 p.m., CUELLO-REYNOSO used Target Telephone #4 to call YEIRON, who was using telephone number (978) 204-7207, and talk to him about starting to get paid. During the call, CUELLO-REYNOSO said, “No one is Superman. Hide the stuff away, and always be aware until you get home. If anything, swallow the stuff.” I believe that YEIRON was a new drug distributor for CUELLO-REYNOSO, and CUELLO-REYNOSO was advising him to be alert for law enforcement presence, and to swallow any drugs if he were stopped by police.

118. At 7:07 p.m. that night, CUELLO-REYNOSO texted YEIRON, “40 Capen st Boston MA.” YEIRON responded via text message, “9 min.” YEIRON then texted, “What do they want.” CUELLO-REYNOSO replied, “1 red 1 green.” YEIRON acknowledged, and at 9:18 p.m., texted, “I’m here.” I believe that during this exchange, CUELLO-REYNOSO directed YEIRON to deliver a gram of fentanyl and half a gram of crack cocaine to a drug customer at 40 Capen Street in Boston.

119. At 7:32 p.m. that night, CUELLO-REYNOSO texted YEIRON, “19 Darcia st Boston MA.” YEIRON replied, “15 min,” and then texted, “What do they want.” CUELLO-REYNOSO replied, “1 big.” At 7:47 p.m., YEIRON texted, “I’m here.” I believe that during this





[REDACTED]

[REDACTED]

[REDACTED]



baggies. Altogether, officers seized 28.5 grams of laboratory-confirmed fentanyl and 12.4 grams of laboratory-confirmed cocaine from GONZALEZ and his car. Officers also seized \$1,810 from GONZALEZ's person.

129. On February 13, 2023, police in Norwood, Massachusetts, stopped GONZALEZ for speeding. GONZALEZ was arrested on an outstanding warrant out of Dedham District Court. During a search incident to arrest, officers seized \$140 and numerous plastic baggies, some of which were marked with green or blue, containing suspected fentanyl and powder and crack cocaine from GONZALEZ's pockets and pants legs. Officers subsequently searched GONZALEZ's vehicle and seized \$774 in cash. Altogether, officers seized approximately 7 grams of laboratory-confirmed fentanyl and 3.8 grams of laboratory-confirmed cocaine (in green and blue baggies).

130. CUELLO-REYNOSO changed telephone numbers seemingly as a result of GONZALEZ's arrest. I believe this was because GONZALEZ was working as a distributor for the DTO at the time of his arrest.

Luis GUERRERO

131. GUERRERO was a drug distributor for the target DTO. On January 13, 2024, Dedham Police arrested GUERRERO after stopping him for a marked lanes violation and observing a small plastic baggie containing brownish powder marked with red in plain view in his vehicle. Police seized \$1,502 from GUERRERO's pocket and fentanyl, powder cocaine, and crack cocaine in color-coded baggies from inside the passenger compartment of the car GUERRERO was operating, which was the same car that YEIRON had been operating at the time of his arrest on December 8, 2023, and which was registered to SOTO-TEJEDA. Altogether, officers seized approximately 39 grams of laboratory-confirmed fentanyl and 22 grams of laboratory-confirmed

cocaine from the car GUERRERO was driving. VIZCAINO and CUELLO-REYNOSO changed telephone numbers seemingly at least partially as a result of GUERRERO's arrest. I believe this was because GUERRERO was working as a distributor for the DTO at the time of his arrest.

Mariela Cuello Reynoso ("MARIELA")

132. MARIELA is CUELLO-REYNOSO's sister and was romantically involved with VIZCAINO. For a period of time, she maintained a drug processing and stash location at her residence at 59 Monsignor Lydon Way in Boston. MARIELA also distributed drugs on behalf of CUELLO-REYNOSO. MARIELA was intercepted communicating with VIZCAINO, and her telephones were intercepted during June 2024. She was intercepted discussing her participation in the conspiracy. Representative interceptions are set forth below.

*On May 3, 2024, VIZCAINO and MARIELA  
Discussed MARIELA's Operation of a Stash House.*

133. On May 3, 2024, at 3:44 p.m., agents intercepted a call over Target Telephone #9 during which VIZCAINO spoke with MARIELA, who was using telephone number (617) 690-9031. During the call, MARIELA said, "There was one that was missing a few. How many blues do you have left?" VIZCAINO said, "I don't know." MARIELA then said, "He needs to designate someone to be here, because I can't be doing that, because I don't want to be taking shit from him. He knows I shouldn't be in here. I think I accidentally gave you what I was supposed to give Menor. There is some food in there that is complete." VIZCAINO then said, "I sold six blue." MARIELA then continued, "I have been in here all week alone, and I can't handle that." VIZCAINO said, "For someone to take care of that, it has to be someone in charge of only that, without having to go in and out all the time. The job is better for men, instead of women. When I used to be in charge of that, I had to stay there late waiting for the stuff to dry. It was the same when we were in Roxbury and had to make crack." MARIELA said, "The smell in here makes

me lose my appetite.” MARIELA then asked VIZCAINO if he opened “the thing to check” and asked, “Did you take out from the car what you were supposed to grab before you arrived?” VIZCAINO said there was a lot of traffic and that he would call her later because he was going to do something.

134. I believe that during this call, MARIELA asked VIZCAINO how many bags of powder cocaine (“blues”) he had left. I believe that MARIELA then complained that she was working in the stash house and said that CUELLO-REYNOSO knew that she should not be there and that he needed to hire someone else to keep inventory and manage the drug stash. I believe that MARIELA was concerned that she had not correctly kept track of the drug inventory and had given drugs to VIZCAINO that had been meant for CONCEPCION (“I think I accidentally gave you what I was supposed to give Menor.”). I believe that VIZCAINO opined that it was important to have a stash house operator that did not have other responsibilities (“For someone to take care of that, it has to be someone in charge of only that”). I believe that VIZCAINO then discussed the time consuming nature of processing the drugs for distribution, including making crack cocaine and waiting for the drugs to dry after they were cooked into crack, and that MARIELA stated that the smell of the drugs in the stash house was making her sick to her stomach.

*On May 5, 2024, VIZCAINO Spoke with MARIELA  
About Cocaine He Had Received from the Stash.*

135. On May 5, 2024, at 5:21 p.m., agents intercepted a call over Target Telephone #9 during which VIZCAINO spoke with MARIELA, who was using telephone number (479) 487-3933. During the call, MARIELA stated that “Sonny” had just left her place. VIZCAINO subsequently asked, “Who prepared these balls? They have a different number.” MARIELA asked, “What was that?” and VIZCAINO repeated, “Who prepared those big balls?” MARIELA asked, “Which ones?” and VIZCAINO said, “The big balls that were recently prepared.”

MARIELA replied, “Maybe it was Menor and Sonny, because they were the ones here last night.” VIZCAINO said, “Hmmm,” and MARIELA asked, “Is it because they are tight?” VIZCAINO said, “No, they are tight, but not from the top. It is strange, man.” MARIELA then asked, “That stuff is like wet, right? The blue stuff.” VIZCAINO affirmed, “Yes, when you dirty your hands, it leaves it slippery. It’s like a grease.” MARIELA then said, “That looks shiny.” VIZCAINO replied, “That is how it is.” They then began talking about their relationship before the call ended.

136. I believe that during this call, VIZCAINO asked MARIELA who had prepared packages of cocaine that he was distributing for CUELLO-REYNOSO (“Who prepared these balls?”). I believe that MARIELA stated that CUELLO-REYNOSO (“Sonny”) and CONCEPCION (“Menor”) had prepared the drugs for distribution the night prior, and that VIZCAINO said that the drugs were packaged strangely. I believe that MARIELA then commented on the texture of the packaging (“That stuff is like wet, right? The blue stuff”), and that VIZCAINO agreed that the packaging of the cocaine was greasy.

*On June 13, 2024, MARIELA Began Delivering Drugs for CUELLO-REYNOSO.*

137. On June 13, 2024, at 4:00 p.m., MARIELA received an intercepted call on Target Telephone #10 from CUELLO-REYNOSO, who was using telephone number (978) 943-0858. During the call, CUELLO-REYNOSO said, “Okay, if you want to make a couple of pesos, I’ve got 1,000 and change that you can take. I have a couple of people that need to be seen. You can grab that for yourself.” MARIELA said, “That’s fine.” CUELLO-REYNOSO said, “If you’d like. Because they pulled Ringel over and took the car from him, because of the license.” MARIELA said, “Um hum, So, where are you then?” CUELLO-REYNOSO replied, “No, I’m going to have you go to the cross-eyed guy, Papitin’s brother, so he can give you the stuff. And after that, I will start sending you the people.” MARIELA agreed, and CUELLO-REYNOSO continued, “It’s a

couple of people. There is one in Lynn. There is a couple of people. Whoever you manage to see, I will give that to you. It's 1,000 and change. There is one in Lynn, another one in, there is a couple. It's 4:00 right now, so I would say by 10:00." MARIELA stated that she had to go pick up Angel in September, and that she was going to start working Uber but had to wait for them to accept. CUELLO-REYNOSO said, "Alright, those people are not hot. You hide it well in there, and there is no problem." MARIELA said, "Alright, send me the address." CUELLO-REYNOSO agreed.

138. I believe that during this call, CUELLO-REYNOSO inquired whether MARIELA wanted to deliver drugs to customers on his behalf ("I have a couple of people that need to be seen"). I believe that CUELLO-REYNOSO stated that a drug distributor ("Ringel") had been arrested due to not having a license, and stated that he had drugs available that MARIELA could deliver. I believe that MARIELA agreed to start making deliveries and stated that she had intended to start driving for Uber but had not yet been approved as a driver. I believe that MARIELA stated that in September she would have to go to the Dominican Republic to pick up her son ("Angel"), explaining why she was interested in more temporary work. I believe that CUELLO-REYNOSO stated that the customers he was having her make deliveries to were not people who drew law enforcement attention ("are not hot"), so MARIELA was not taking a lot of risk. I believe that MARIELA agreed to make the deliveries and told CUELLO-REYNOSO to send her the information.

Elisbania TEJEDA-SOTO a/k/a "Lisbania"

139. TEJEDA-SOTO is the paramour of VIZCAINO. She was regularly intercepted discussing and strategizing about drug distribution with him. On April 23, 2024, TEJEDA-SOTO



drove the car in which VIZCAINO sold fentanyl to the UC in a transaction arranged by CUELLO-REYNOSO.

140. Starting in or about May 2024, TEJEDA-SOTO worked with VIZCAINO to establish an independent drug dispatch service. She and VIZCAINO were intercepted discussing her distribution activities. Representative interceptions are set forth below.

*On May 2, 2024, VIZCAINO and TEJEDA-SOTO Discussed  
Starting to Distribute Drugs on Their Own.*

141. On May 2, 2024, at 8:21 p.m., agents intercepted a call over Target Telephone #9 during which VIZCAINO spoke with TEJEDA-SOTO, who was using telephone number (857) 693-3685. During the call, TEJEDA-SOTO reported to VIZCAINO about various people she was meeting with. VIZCAINO said, “Do the math of how much we would make in a week if we make 400 a day.” TEJEDA-SOTO said, “It would be 2,800.” VIZCAINO replied, “That’s better than all the work we have to do working here. This job has me like the Roadrunner all day long.” TEJEDA-SOTO then began discussing buying a second car and expenses. She then said, “They sent me the address of where the person lives: Alicia from West Roxbury. One of them lives across from the hospital, and the other one lives in West Roxbury. I am going to write down the address on my notepad at home.” After discussing an appointment that VIZCAINO had the following day, VIZCAINO asked what TEJEDA-SOTO was taking to the woman she was going to meet. TEJEDA-SOTO said, “I’m bringing her brown from the stuff you made that they think is good.” VIZCAINO asked, “The regular one?” and TEJEDA-SOTO replied, “Yes. Those people like the stuff that kills them.” TEJEDA-SOTO then said she was in West Roxbury taking a sample to the woman who lives there, and that afterwards she was going to Brockton to see another woman, but that she needed to go home first to “grab that.” VIZCAINO then chastised TEJEDA-SOTO, “You can’t be going back to the house that often.”

142. I believe that during this call, VIZCAINO and TEJEDA-SOTO discussed how much money they could make distributing drugs on their own rather than working with CUELLO-REYNOSO and determined that they could make approximately \$2,800 per week. I believe that TEJEDA-SOTO discussed new fentanyl (“brown”) customers she had received information for and stated that she was going to write the customers’ addresses down in a notebook that she had at home. I believe that TEJEDA-SOTO referenced the danger of overdose posed by fentanyl (“Those people like the stuff that kills them”), that TEJEDA-SOTO stated that she was delivering fentanyl to a new customer (“I’m bringing her brown from the stuff you made that they think is good.”), and that VIZCAINO chastised TEJEDA-SOTO for going back to their residence (where the drugs were stored) to retrieve drugs too often, risking drawing law enforcement attention (“You can’t be going back to the house that often.”).

*On May 5, 2024, TEJEDA-SOTO Discussed Drug Deliveries She Was Making.*

143. On May 5, 2024, at 11:01 a.m., agents intercepted a call over Target Telephone #9 during which VIZCAINO spoke with TEJEDA-SOTO, who was using telephone number (857) 693-3685. During the call, TEJEDA-SOTO said, “I told the crazy girl Alicia from West Roxbury that I was close, and she just hit me up now.” VIZCAINO asked, “Did you take the stuff to the guy?” TEJEDA-SOTO replied, “I went immediately to the guy, and I gave him a big and a small one. I will take him a gift.” VIZCAINO asked, “Did the girl buy a big?” TEJEDA-SOTO affirmed and said, “I gave two small to the guy to try them out.” VIZCAINO said, “That’s fine. What about the guy we saw yesterday? Did he hit you up?” TEJEDA-SOTO negated and then said, “He sent me a text, and I told him I was close to where he was, but he didn’t respond. He might have been sleeping. It was the same guy we saw yesterday.” VIZCAINO then asked, “What’s up with the guy who bought the hard?” TEJEDA-SOTO replied, “I called him from my phone, and I

am trying to find his number, because I remember I called him because he speaks Spanish. I can't remember what I saved the name under. I saved the guy's number, but since I have so many contacts saved, I can't find it. I am deleting these people's numbers, and I have to put Mickey's. Someone is asking the price for a gram." VIZCAINO replied, "You have big for \$100 at 2.5 and a gram for \$45." TEJEDA-SOTO said, "I already told him. When I come back, I am going to erase the numbers I don't use." VIZCAINO said, "They call you a lot, and you need to save those numbers properly, otherwise it's lost money." VIZCAINO then said, "Did she ask for a big?" TEJEDA-SOTO affirmed and said, "I will give her a little gift. We used to sell her a gram for 140." VIZCAINO said, "Take something separate in case." TEJEDA-SOTO confirmed she had something separate.

144. I believe that during this call, TEJEDA-SOTO reported to VIZCAINO about drug customers she had seen and communicated with. I believe that TEJEDA-SOTO stated that a customer in West Roxbury had requested to purchase 2.5 grams of fentanyl ("a big"), and that she had delivered 2.5 grams of fentanyl ("a big") and a smaller quantity of drugs ("a small one") to a male customer. I believe that TEJEDA-SOTO stated that she had given the male customer two samples of drugs ("a gift"; "two small") for free. I believe that VIZCAINO asked about two other male customers, one of whom purchased crack cocaine ("hard"), but that TEJEDA-SOTO had not delivered drugs to those two customers. I believe that VIZCAINO and TEJEDA-SOTO discussed the price they were charging for certain quantities of drugs ("\$100 at 2.5 and a gram at \$45").

Rubert Adrian JIMENEZ a/k/a "Soga"

145. JIMENEZ worked as a distributor for the target DTO. As set forth in Exhibit A, JIMENEZ distributed fentanyl to the UC on May 5, 2023, in a transaction arranged by [REDACTED]. [REDACTED] In addition, JIMENEZ was intercepted receiving instructions about drug deliveries from

and making reports about drug proceeds to CUELLO-REYNOSO and discussing drug distribution and drug proceeds with VIZCAINO. Representative interceptions are set forth below.

146. On October 15, 2023, starting at 10:49 p.m., JIMENEZ (who was using telephone number (781) 366-8797) engaged in a series of text exchanges with Target Telephone #4, used by CUELLO-REYNOSO. CUELLO-REYNOSO sent a pin drop for 65 School Street, Revere, Massachusetts, and JIMENEZ responded, “3 minutes,” meaning that he would arrive at that location in three minutes. At 11:02 p.m., JIMENEZ texted Target Telephone #4, “1 red 1 green 80,” meaning that the customer wanted to receive 2.5 grams of fentanyl (“1 red”) and half a gram of crack cocaine (“1 green”) for \$80. At 11:27 p.m., JIMENEZ texted, “20 food 42 gas 2470 cash,” meaning that he had \$2,470 in drug proceeds and had spent \$20 on food and \$42 on gas during his shift delivering drugs. At 11:31 p.m., CUELLO-REYNOSO texted back from Target Telephone #4, “2634” followed by “Minus 60” and “2574,” meaning that he believed that JIMENEZ’s count was wrong. JIMENEZ replied, “Ok I am going to take it out again.” CUELLO-REYNOSO then texted, “Missing 100.” JIMENEZ then texted CUELLO-REYNOSO, “Ok,” “I have not counted the money yet,” and “They should be there my brother.” CUELLO-REYNOSO replied, “Ok.” I believe that during this exchange, JIMENEZ and CUELLO-REYNOSO were texting about the money JIMENEZ had collected from drug customers that day; that CUELLO-REYNOSO had kept records of the drugs he had dispatched JIMENEZ to deliver; and that CUELLO-REYNOSO’s records of the deliveries were not consistent with the money count that JIMENEZ provided to him.

147. The following day, CUELLO-REYNOSO sent JIMENEZ locations throughout the day, and JIMENEZ replied with periods of time, *i.e.* “20 minutes,” indicating how long it would take him to get to the location. CUELLO-REYNOSO would then send JIMENEZ a drug quantity

to deliver – referred to as “biggs,” “reds,” “greens,” and “blacks” – and sometimes a price, *i.e.* “200.” Sometimes, JIMENEZ and CUELLO-REYNOSO would message or text about the quantity of money the customer had (*i.e.*, “He is always short”). After meeting with the customer, JIMENEZ would send CUELLO-REYNOSO a confirmation text message with the drug quantity he had delivered and the money he had collected, *i.e.*, “5 red 2 green 200.” At the end of the day, JIMENEZ reported that he had collected \$2,880.

148. On October 26, 2023, at 1:50 p.m., JIMENEZ (who was using telephone number (781) 366-8797) spoke with VIZCAINO over Target Telephone #7. During the call, VIZCAINO said, “I thought you were going to swing by early to reload.” JIMENEZ said, “I still have food left. I sold about \$2,050.” JIMENEZ then stated that his buddy had called him to talk about “Jose.” He went on to say that Jose had asked for JIMENEZ’s number, and that his buddy had said that “Jose is not very smart, because he should know that jail calls are recorded.” VIZCAINO and JIMENEZ then discussed Jose’s upcoming court date and his attorney, including whether “the man” had paid for his lawyer. JIMENEZ ultimately said, “I feel bad for Jose, but those jail calls are recorded and he is too reckless.” JIMENEZ then stated that he would ask “the man” to change his current work car since he had been driving the same car for a month.

149. I believe that during this call, VIZCAINO stated that he thought JIMENEZ was going to come to the drug stash location where VIZCAINO was working to get more drugs for distribution (“reload”). I believe that JIMENEZ stated that he still had drugs (“food”) available to distribute, and that he had sold approximately \$2,050’s worth of drugs that day. I believe that JIMENEZ and VIZCAINO then discussed [REDACTED] arrest and the fact that [REDACTED] was attempting to contact JIMENEZ. I believe that “the man” was a reference to CUELLO-REYNOSO, who JIMENEZ believed may have possibly paid for [REDACTED] attorney since

██████████ was working for him (CUELLO-REYNOSO) at the time of his arrest. I further believe that JIMENEZ stated that he would ask CUELLO-REYNOSO to change the car he (JIMENEZ) was driving to distribute drugs in order to avoid law enforcement detection.

150. That afternoon, at 3:13 p.m., JIMENEZ spoke with VIZCAINO over Target Telephone #7 again. During the call, JIMENEZ stated, “Count the money and send a message to the man after you check the count.” VIZCAINO asked, “Haven’t you told the man you’re ready,” and JIMENEZ negated, saying that he needed to wait until VIZCAINO counted the money. JIMENEZ said, “I gave you a pack with 1,370, another pack of 640, and 240 that I gave at the end. Count the money, and let me know when you’re done. I’ll wait outside parked.” VIZCAINO then proceeded to count the money, which could be heard on the call. VIZCAINO said, “It’s 2,150.” They then hung up. I believe that during this call, JIMENEZ confirmed that he had dropped off drug proceeds to VIZCAINO at the stash location, asked VIZCAINO to check the count (which VIZCAINO confirmed to be \$2,150), and asked VIZCAINO to notify CUELLO-REYNOSO once the count was confirmed.

Yeikel PEREZ-TEJEDA

151. PEREZ-TEJEDA worked as a distributor on behalf of the target DTO. As set forth in Exhibit A, PEREZ-TEJEDA distributed fentanyl to the UC on August 19, September 22, and December 9, 2022, and on March 16 and May 24, 2023, in transactions arranged by CUELLO-REYNOSO, ABEL RIVERA, and ██████████

152. As set forth in paragraphs 51-60 above, on July 9, 2023, PEREZ-TEJEDA was stopped by Barnstable Police after he delivered fentanyl to CUOCO in a transaction directed by ██████████. The car PEREZ-TEJEDA was driving was towed, and 27 plastic baggies of drugs were subsequently recovered from the engine compartment of the car. Altogether, these







bags), some of which were marked with green (8 bags), some of which were marked with black (3 bags), one of which was marked with red, and some of which were unmarked (3 bags). Altogether, officers seized approximately 9.1 grams of fentanyl (including the bag of drugs seized from S.G.) and 18.6 grams of cocaine. MEJIA HERNANDEZ was taken to the hospital because he told officers he had swallowed bags of drugs and felt ill.

160. On March 7, 2024, MEJIA HERNANDEZ was stopped by Norwood Police after they observed activity consistent with drug distribution. Officers seized fentanyl (in red-marked and unmarked plastic baggies), powder cocaine (in blue-marked baggies), and crack cocaine (in green- and black-marked baggies) from a sock concealed in a hidden compartment in the steering column of the car MEJIA HERNANDEZ was operating. Officers also seized \$440 from MEJIA HERNANDEZ. MEJIA HERNANDEZ told officers that he had swallowed 5-10 bags of drugs of various colors while police were stopping him. MEJIA HERNANDEZ was arrested on state drug charges and taken to the hospital, where he passed four baggies believed (based on their markings) to contain fentanyl and powder and crack cocaine. Altogether, police seized 40.2 grams of laboratory-confirmed fentanyl and 26 grams of laboratory-confirmed cocaine.

161. VIZCAINO and CUELLO-REYNOSO changed phone numbers seemingly as a result of MEJIA HERNANDEZ's arrest. I believe this was because MEJIA HERNANDEZ was working as a distributor for the DTO at the time of his arrest.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

Santo FRANCO-SANCHEZ

164. FRANCO-SANCHEZ worked as a distributor for the target DTO. As set forth in Exhibit A, FRANCO-SANCHEZ distributed fentanyl to the UC on May 4, 2022, in a transaction arranged by CUELLO-REYNOSO.

Francisco TAVAREZ CONTRERAS

165. TAVAREZ CONTRERAS worked as a distributor for the target DTO. As set forth in Exhibit A, TAVAREZ CONTRERAS distributed fentanyl to the UC on October 20, 2024, in a transaction arranged by CUELLO-REYNOSO. After the undercover purchase, TAVAREZ CONTRERAS was stopped by police. TAVAREZ CONTRERAS was removed from the car and sat on the ground leaning against the rear tire of the car. Officers recovered a bag containing plastic baggies of suspected narcotics from underneath the car TAVAREZ CONTRERAS had been driving, behind the tire where he was seated on the ground. Officers also recovered a bag of plastic baggies of suspected narcotics from the engine compartment of the car. Altogether, officers recovered approximately 98.1 grams of suspected fentanyl (in red-marked and unmarked baggies) and approximately 21.8 grams of suspected cocaine (in blue-, green-, and black-marked baggies). The vehicle TAVAREZ CONTRERAS was driving was registered to CONCEPCION. After TAVAREZ CONTRERAS was stopped, CUELLO-REYNOSO called the UC to inquire whether everything had gone alright when he met with CUELLO-REYNOSO's "guy."

166. On January 30, 2023, TAVAREZ CONTRERAS called 911 from a Mobil gas station in Norwood for a medical emergency. Upon arrival, police observed a female, who TAVAREZ CONTRERAS stated was his girlfriend, who appeared to be suffering from a fentanyl

overdose. Police recovered a baggie of suspected fentanyl (marked with red) from the female's purse. TAVAREZ CONTRERAS made inconsistent statements to police, and police ultimately observed a large bag containing multiple smaller bags of suspected narcotics hanging out of TAVAREZ CONTRERAS's jacket pocket. The smaller bags were color-coded (red, blue, and green) and were of different sizes. Officers also seized \$1,556 from TAVAREZ CONTRERAS. Altogether, officers seized approximately 48 grams of suspected fentanyl and cocaine.

Carlos Abel Rivera ("CARLOS")

167. CARLOS worked as a distributor for the target DTO. As set forth in Exhibit A, CARLOS distributed fentanyl to the UC on May 22, 2024, in a transaction arranged by CUELLO-REYNOSO.

Anthony CUOCO

168. CUOCO was a fentanyl redistributor who was intercepted on multiple occasions arranging to obtain fentanyl from CUELLO-REYNOSO.

169. As set forth above, on July 9, 2023, PEREZ-TEJEDA was stopped by police after he delivered fentanyl to CUOCO. CUOCO, [REDACTED] and CUELLO-REYNOSO were intercepted discussing the stop.

//

//

//

//

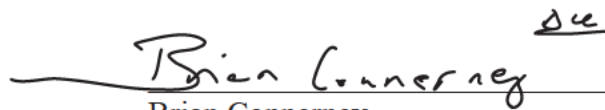
//

//

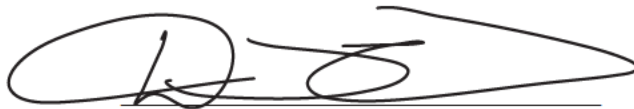
//

CONCLUSION

301. Based on the foregoing, I believe probable cause exists to conclude that the Target Subjects have conspired to possess with intent to distribute and to distribute fentanyl and cocaine, in violation of 21 U.S.C. § 846.

  
Brian Connerney  
Task Force Officer  
Drug Enforcement Administration

Sworn to by telephone in accordance with Fed. R. Crim. P. 4.1 on November 6, 2024,



DONALD L. CABELL  
United States Magistrate Judge  
District of Massachusetts

