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UNITED STATES DISTRICT COURT

APR 20 2015

for the

Western District of Washington

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY _____In the _____ of the Search of
DEPUTY
(Briefly describe the property to be searched
or identify the person by name and address)See Attachment A for List of Locations to be Searched,
attached hereto.

Case No.

MJ15-164

APPLICATION FOR A SEARCH WARRANT

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

See Attachment A for List of Locations to be Searched, attached hereto.

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

See Attachment B for List of Items to be Seized, attached hereto.

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

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

The search is related to a violation of:

Code Section

Offense Description

See Attachment C for List of
Violations, attached hereto.

The application is based on these facts:

See attached Affidavit of

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



Applicant's signature

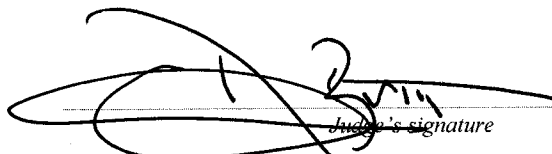
Brandon James, Task Force Officer FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/20/2015

City and state: Seattle, Washington



Judge's signature

Dean Brett, United States Magistrate Judge

Printed name and title

Attachment A
Locations to be Searched

RESIDENCES

1) Residence No. 1: 5724 South Bangor Street, Seattle, Washington, 98178

The address 5724 S Bangor St is a detached, two story, single family home. It is located on the north side of S Bangor Street. The house is accessed by a long driveway which is located between addresses 5722 S Bangor Street and 5728 S Bangor Street. The driveway services a cluster of four houses. The target address is the last house on the left at the end of the driveway. The numbers "5724" are nailed horizontally onto the house on the left side of the two-car garage, which faces the south. On the west side of the garage there is a covered porch with the front door that also faces south. The house is green in color with brown accent color and white trim. It has a gray composite roof.

2) Residence No. 2: 5571 18th Avenue South, Seattle, Washington, 98108

The property located at 5571 18th Avenue S, in Seattle, King County, Washington 98108. The property is on the northwest corner of 18th Avenue S and S Orcas Street. The property appears to include a one-story single-family residence and a detached garage. It is a white house, with white trim and a red roof. The front door faces south, toward S Orcas Street; the numbers "5571" appear to the right of the front door. The detached garage shares the same design as the house, has a red door, and is situated on the west edge of the property.

3) Residence No. 3: 575 Graham Avenue Northeast, Renton, Washington, 98059

575 Graham Avenue NE is a two-story, single family residence. It is located at the southwest corner of Graham Ave NE and NE 6th St. The house has tan-colored siding (with some gray siding) and white trim. The numbers "575" are in vertical black numbers on the trim of the north edge of the northern-most garage door, which faces east. It has a gray composite roof.

4) Residence No. 4: 1802 19th Avenue South, Seattle, Washington, 98144

1802 19th Ave S., Seattle is a two story residence. The house is painted tan and orange, with white trim. The two garage doors are on the west side of the house. The numbers "1802" are posted above and between the garage doors.

5) Residence No. 5: 11115 59th Avenue South, Seattle Washington, 98178

The address 11115 59th Ave. S is a detached, one-story, single family home. The residence is located on the west side of 59th Ave. S, one house south of the intersection of 59th Ave. S and S Avon St. The house is accessed by a short driveway off of 59th Ave S. The numbers "11115" are nailed horizontally onto the house to the right of the front door, which faces east. The house is white in color with reddish brown shutters and a blue stairway leading to the front door. It has a gray composite roof.

6) Residence No. 6: 12023 46th Avenue South, Tukwila, Washington, 98178

The house located at 12023 46th Ave S Tukwila, is light tan in color with white and tan trim. The front door appears to have a tan (matching house color) metal security door on it. The numbers "12023" are posted in gold vertically next to the garage door.

7) Residence No. 7: 4700 South 172nd Place, SeaTac, Washington, 98188

The address 4700 S 172nd PL, SeaTac is single story, single family home. The residence is located on the north side of S 172nd Pl and has the numbers "4700" posted in the color gray to the right of the front door just below a porch light. The home is white in color with gray trim and a dark gray colored roof. The front door faces S 172nd PL and is centered in the middle of the home. There are two windows on both sides of the front door. A medium/large window sits to its left and a larger window to the right of the front door. There is a gravel driveway to the right of the residence that leads to a garage structure. The garage is detached from the home and sits back off the 3/4 corner of the home.

8) Residence No. 8: 10202 Myers Way South, Seattle, Washington, 98168

10202 Myers Way S., Seattle is a beige single-family home with white trim and an attached garage. "10202" is clearly visible in black numbers attached to the west wall of the house facing Myers Way, between two windows. 10202 Myers Way S. is located to the south of Aqua way S. and to the north of 101st St. on the east side of Myers Way, South.

9) Residence No. 9: 13717 Linden Avenue North #225, Seattle, Washington, 98133

The address 13717 Linden Ave N, Seattle is a three story condominium complex called the "Linden Park Condominiums." The building is a three story residential condominium complex over a basement parking garage. The building and garage are secured. The building is cream in color with green trim. The complex front door is located on the east side of the building and faces east toward Linden Ave N. The name of the complex and the numbers "13717" are posted above the complex front door. The unit #225 is located in the west wing of the building on floor two. The door is the northeast corner unit of the west central hallway, located next to the second floor north exit door. The door faces west. The unit door is white and has gold-colored metal numbers "225" posted on the middle of the door.

10) Residence No. 10: 12005 76th Avenue South, Seattle, Washington, 98178

The residence 12005 76th Ave S in Seattle is a single family, detached home. The structure is a two story building that is tan in color with white trim. It has a grey composite roof. The house is located on the southwest corner of S 120th St and 76 Ave S. The house is accessed via the first driveway on the west side of 76th Ave S, just south of the intersection with S 120th St. There is a black mailbox out front with gold numbers "12005." There are also numbers "12005A" to the left of the front door in white lettering on black stickers. The front door faces east and is accessed by the front porch attached to the upper story of the home. On the north side of the house there is a back door with black numbers "7569B" mounted horizontally to the right of door. The back door faces

north, and accesses the lower story of the house. The entire north and east side of the property has a dilapidated fence around it made up of wood boards and plywood. A review of parcel viewer for the address "7569 S 120th St, Seattle" or "7569B S 120th St, Seattle" does not show a valid address. There is no separate, visible mailbox for 7569. There are no access points to the property, such as driveway/walkway, off of S 120th St. The last valid address listed on parcel viewer on S 120th St prior to 76th Ave S is 7565 S 120th St. The address 7569B S 120th St, Seattle appears to be an invalid address according to King County.

11) Residence No. 11: 12235 Southeast 206th Street, Kent, Washington, 98031

The address 12235 SE 206th St, Kent is a brown colored mobile home single story, single family home. The home sits on the south side of SE 206th St and has the numbers "12235" posted vertically on the left side (north east edge) on the front of the home. There are two visible points of entry from SE 206th St. The first point of entry is on the east side of the home about two thirds the way down the structure. There is a small stair case leading to this door. The second point of entry is on the west side of the structure. This area is covered by a car port area. There are windows on the front of the home facing SE 206th St that were cover with blinds at the time.

12) Residence No. 12: 643 Southwest 122nd Street, Burien. Washington, 98146

The house is located at 643 SW 122nd St, Seattle, it is a two story house and appears to be a single family residence. The house is bright green in color with white trim. The windows in front of the house are surrounded by white trim and have black bars metal bars on them. The front doors and side door have metal screen security doors on them. The roofing in dark gray asphalt shingles. There are several trees at the front on the house and shrubs surrounding the house.

13) Residence No. 13: 31234 8th Avenue South, Federal Way, Washington, 98003

The residence at 31234 8th Ave S. is a single-family, rambler-style house. The house is situated on the east side of 8th Ave South, within the city of Federal Way, County of King, State of Washington. The front door faces south and is covered with a white

colored screen/storm door. It has a two-tone, tan and brown, colored siding with white trim. The numbers "31234" are mounted horizontally on the front of the house between the front door and the attached garage. A six-foot tall wood fence lines the sides of the property on the backside of the house.

14) Residence No. 14: 11607 7th Avenue Southeast, Everett, Washington, 98208

11607 7th Ave SE is a single-family residence. It has gray siding with white trim. The numbers "11607" are attached vertically to a pillar that is to the right of the front door. A stairway leads to the front door, which faces north.

15) Residence No. 15: 23916 Highway 99 Room #28 (Golden West Motel), Edmonds, Washington, 98026

The address 23916 Highway 99 is the Golden West Motel. It is located on the west side of Highway 99, between the Taco Time and the onramp for westbound Highway 104. The driveway is located between the two large business signs that say "Golden West Motel." A white mailbox for the property is located on the north side of the driveway with stickers "23916" attached to it. The Motel is made up of three buildings. One building is a one story structure that runs east-west on the south end of the property. The second building is a two story structure that runs north-south on the west side of the property. The target unit is located in the third building, which is a one story structure that runs east-west on the north side of the property. The building is tan in color and has a grey composite roof. This building consists of units 26-30 and the manager's office. Unit 28 is in the middle of the building with a red door that faces south, toward the driveway. Black number "28" is nailed to the right of the target door.

BUSINESS

1) Business No. 1: 19411 Highway 99 Lynnwood, Washington, 98036

The address 19411 Highway 99 Lynnwood is located on the east side of Highway 99 in Lynnwood. It is a business labeled "Western Motorcoach" and "Country Coach". On the rear (east side of the business) are 4 attached maintenance garage bays. The southeast garage bay is occupied by Niem DOAN's business. The physical address remains 19411 Highway 99, Lynnwood.

VEHICLES

- 1) Vehicle No. 1: White 2007 Cadillac Escalade, Washington License Plate APZ1179
- 2) Vehicle No. 2: White 2006 Lexus GS3, Washington License Plate ARZ5325
- 3) Vehicle No. 3: Silver 2000 Jaguar S, Washington License Plate AQC0425
- 4) Vehicle No. 4: Tan 1997 Lexus ES, Washington License Plate 868-YMH
- 5) Vehicle No. 5: Silver 1997 Toyota Camry, Washington License Plate ARZ4557
- 6) Vehicle No. 6: Gray 2006 Mercedes E320, Washington License Plate ATJ1438
- 7) Vehicle No. 7: Blue 1998 Nissan Quest van, Washington License Plate AKL1020
- 8) Vehicle No. 8: White 1999 Ford Expedition, Washington License Plate ALD1402
- 9) Vehicle No. 9: Green 1993 Toyota Camry, Washington License Plate AAT9509
- 10) Vehicle No. 10: Gray 2005 Toyota Sienna, Washington License Plate AIV0209
- 11) Vehicle No. 11: Burgundy 1992 Ford Pickup, Washington License Plate B72126G
- 12) Vehicle No. 12: Silver 1996 Mitsubishi Eclipse, Washington License Plate
AQA6399
- 13) Vehicle No. 13: White 1999 Mercury Mountaineer, Washington License Plate
ATG2524
- 14) Vehicle No. 14: Silver 2004 Kia Temp#1666027A
- 15) Vehicle No. 15: Silver 2006 Honda Civic, Washington License Plate ANC2840
- 16) Vehicle No. 16: Blue 1999 Ford Taurus Station Wagon
- 17) Vehicle No. 17: Silver 2013 Mercedes C300, Washington License Plate AMG3957
- 18) Vehicle No. 18: Green 1997 Chevrolet T10 PU, Washington License Plate
C49136C
- 19) Vehicle No. 19: Black 2011 Toyota Camry, Washington License Plate AFK7948
- 20) Vehicle No. 20: Silver 2000 Honda CRV, Washington License Plate ALD8415
- 21) Vehicle No. 21: White 2014 Mitsubishi Lancer, Washington License Plate
AOF2058

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution and possession with intent to distribute controlled substances, to wit, cocaine, heroin, and methamphetamine in violation of 21 U.S.C. § 841(a)(1), Use of a communications facility in furtherance of a felony drug offense in violation of 21 U.S.C. § 843(b), Conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, Laundering of monetary instruments in violation of 18 U.S.C. § 1956, Possession or Receipt of a Firearm or Ammunition by a Prohibited Person, in violation of 18 U.S.C. § 922(g), and Possession of a Firearm in furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c), including but not limited to the following:

1. Controlled Substances: Including but not limited to cocaine, heroin and methamphetamine.
2. Drug Paraphernalia: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Drug Transaction Records: Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug amounts and prices, maps or directions, and similar items.
5. Cash and Financial Records: Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashiers checks, and similar items, and money counters.
6. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property occupants, friends and relatives of the property occupants, or

suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.

12. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,

13. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.

b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.

c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.

e. Collection accounts: statements and other records.

- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.

17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close said compartments.

22. Cell Phones: Cellular telephones and other communications devices including Blackberries may be seized, and searched for the following items:

- a. Assigned number and identifying telephone serial number (ESN, MIN, IMSI, or IMEI);
- b. Stored list of recent received, sent, and missed calls;
- c. Stored contact information;
- d. Stored photographs of narcotics, currency, firearms or other weapons, evidence of suspected criminal activity, and/or the user of the phone or suspected co-conspirators, including any embedded GPS data associated with those photographs;
- e. Stored text messages.

Attachment C
List of Violations

The search is related to one or more of the following violations of federal law:

- a. Distribution and possession with intent to distribute controlled substances, to wit, cocaine, heroin, and methamphetamine in violation of 21 U.S.C. § 841(a)(1);
- b. Use of a communications facility in furtherance of a felony drug offense in violation of 21 U.S.C. § 843(b);
- c. Conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846;
- d. Laundering of monetary instruments in violation of 18 U.S.C. § 1956;
- e. Possession or Receipt of a Firearm or Ammunition by a Prohibited Person, in violation of 18 U.S.C. § 922(g); and,
- f. Possession of a Firearm in furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c).

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

INTRODUCTION

AFFILIANT BACKGROUND

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am a Seattle Police Department (SPD) detective assigned to the Criminal Intelligence Section. I am also a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and have been so assigned since early 2008. I have received specialized training in the enforcement of federal narcotics laws, and have been involved in all aspects of narcotics trafficking investigations, including: (a) the debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the distribution and transportation of controlled

1 substances, and of the laundering and concealing of proceeds from drug trafficking; (b)
2 physical and electronic surveillance; and (c) analysis of documentary and physical
3 evidence. I also have received training and participated in investigations involving the
4 interception of both wire communications and electronic communications. Finally, I
5 have testified in judicial proceedings and prosecutions for violations of federal narcotics
6 laws. Additionally, I have testified as an expert witness for the Western District of
7 Western Washington court cases for narcotics and weapons related investigations. I also
8 have significant training and experience conducting and managing undercover and
9 sensitive investigations for SPD and FBI to include the use of informants for
10 investigations. I am the co-lead instructor for the Washington State/SPD 2-week Basic
11 and Advanced Undercover School. This school instructs local, state, and federal law
12 enforcement officers throughout the country on undercover techniques, psychology of
13 undercover work, case management, use of informants, surveillance techniques, narcotic
14 identification (including a controlled cook of cocaine into crack cocaine) and trafficking
15 trends, narcotics packaging concealment, and the supervision of undercover officers. I
16 am also a FBI certified undercover employee authorized to work undercover for FBI
17 investigations and sensitive operations. I frequently teach local, state, and federal law
18 enforcement officers other techniques related to organized criminal investigations to
19 include physical and electronic surveillance techniques, search warrant writing, asset
20 seizure, narcotic and weapon trafficking, money laundering, use of informants and open
21 source investigative techniques. Based on my training and experience as a detective and
22 TFO, I am familiar with ways in which narcotics dealers conduct their drug related
23 business, including, but not limited to, their methods of importing and distributing
24 narcotics; their use of telephones; their use of numerical codes and code words to conduct
25 their transactions and to identify themselves and/or the nature of their communications;
26 and their concealment of drug proceeds in real and personal property as well as legitimate
27 businesses. I am also trained in how to identify controlled substances visually and by
28 smell.

1 3. I obtained the following information through personal observations, and
2 state and local investigators reports, and through information provided to me, directly or
3 indirectly, by other law enforcement officers and through discussions with other agents
4 and officers who are familiar with this investigation.

5 **PURPOSE OF AFFIDAVIT**

6 4. This Affidavit is submitted in support of a request to search the residences,
7 vehicles, and business described further below. As set forth below, there is probable
8 cause to believe that each location contains evidence of one or more of the following
9 violations of federal law:

- 10 a. Distribution and possession with intent to distribute controlled
11 substances, to wit, cocaine, heroin, and methamphetamine in
12 violation of 21 U.S.C. § 841(a)(1);
13 b. Use of a communications facility in furtherance of a felony drug
14 offense in violation of 21 U.S.C. § 843(b);
15 c. Conspiracy to distribute and possess with intent to distribute
16 controlled substances, in violation of 21 U.S.C. § 846;
17 d. Laundering of monetary instruments in violation of 18 U.S.C. §
18 1956;
19 e. Possession or Receipt of a Firearm or Ammunition by a Prohibited
20 Person, in violation of 18 U.S.C. § 922(g);
21 f. Possession of a Firearm in furtherance of a Drug Trafficking Crime,
22 in violation of 18 U.S.C. § 924(c).

23 **LOCATIONS TO BE SEARCHED**

24 5. This affidavit is submitted in support of an application to search the
25 following residences, vehicles, and a business, collectively referred to as the "Subject
26 Premises," and more fully described in Attachment A hereto, incorporated by reference.
27 As set forth herein, there is probable cause to believe each location contains evidence of
28

the aforementioned offenses. The evidence to be searched for and seized is more particularly described in Attachment B hereto, incorporated by this reference.

A. Residences And Vehicles Associated With Son V. TRAN And Brianna K. CARLSON.

Residence No. 1 – 5724 South Bangor Street, Seattle, Washington;

Vehicle No. 1 – White 2007 Cadillac Escalade WA/APZ1179;

Vehicle No. 2 – White 2006 Lexus GS3 WA/ARZ5325;

Vehicle No. 3 – Silver 2000 Jaguar S WA/AQC0425.

6. **Residence No. 1** is the residence of Son V. TRAN and Brianna K. CARLSON. On February 27, 2015, U.S. District Court Judge James L. Robart authorized a Title III wire intercept on Son V. TRAN's telephones Target Telephone 1 (714) 227-7384 ("TT1") and Target Telephone 2 (206) 651-0928 ("TT2"). Through these intercepts, investigators have learned that Son V. TRAN is a head of the TRAN and VU DTO and sells controlled substances. CARLSON is Son V. TRAN's significant other and assists Son V. TRAN with obtaining, transporting, distributing, and selling controlled substances. Son V. TRAN and CARLSON were indicted by a Federal Grand Jury on April 16, 2015. Through surveillance, investigators have learned that **Vehicles Nos. 1-3** are all used by Son V. TRAN and CARLSON in furtherance of the TRAN and VU drug trafficking activities. **Residence No. 1** is mentioned herein at paragraphs 94, 108, 109, 114, 135, 140, 156, 169 and 170. **Vehicle No. 1** is mentioned herein at paragraphs 57, 140, 156, 158, 165, 172, 174 and 187. **Vehicle No. 2** is mentioned herein at paragraphs 121, 173, 177, 178 and 188. **Vehicle No. 3** is mentioned herein at paragraphs 141, 158, 166, 175 and 184.

B. Residences And Vehicles Associated With Tuan A. VU, Cuong T. LE, And Yen T. VU.

Residence No. 2 – 5571 18th Avenue South, Seattle, Washington;

Vehicle No. 4 – Tan 1997 Lexus ES WA/868-YMH;

Vehicle No. 5 – Silver 1997 Toyota Camry WA/ARZ4557.

7. **Residence No. 2** is the residence of Tuan A. VU, Cuong T. LE, and Yen T. VU. On February 27, 2015, U.S. District Court Judge James L. Robart authorized a Title III wire intercept on Tuan A. VU's telephone Target Telephone 3 (206) 201-4249 ("TT3"). Subsequently, U.S. District Court Judge James L. Robart authorized a Title III wire intercept on Cuong T. LE's telephone Target Telephone 4 (206) 201-4252 ("TT4"). Along with Son V. TRAN, Tuan A. VU is a head of the TRAN and VU DTO and sells controlled substances. Cuong T. LE is a close associate to the TRAN and VU DTO and assists Tuan A. VU with supplying, transporting, distributing, and selling controlled substances. Yen T. VU is the older sister of Tuan A. VU and the suspected girlfriend of Cuong T. LE. Yen T. VU assists Tuan A. VU and Cuong T. LE with packaging and distributing controlled substances. Tuan A. VU, Cuong T. LE and Yen T. VU were indicted by a Federal Grand Jury on April 16, 2015. **Vehicle Nos. 4 and 5** are used by Tuan A. VU, Cuong T. LE and Yen T. VU in furtherance of the TRAN and VU drug trafficking activities. **Residence No. 2** is mentioned herein at paragraphs 65, 66, 74, 112, 113, 118, 147, 148, 160 and 161. **Vehicle No. 4** is mentioned herein at paragraphs 108, 112, 113, 119, 120, 147, 148, 149, 161, 181, 182, 191 and 203. **Vehicle No. 5** is mentioned herein at paragraph 113.

C. **Residence And Vehicle Associated With Huy V. TRAN.**

Residence No. 3 – 575 Graham Avenue Northeast, Renton, Washington;

Vehicle No. 6 – Gray 2006 Mercedes E320 WA/ATJ1438.

8. **Residence No. 3** is the residence of Huy V. TRAN. Huy V. TRAN is Son V. TRAN's older brother and assists Son V. TRAN in supplying and distributing controlled substances. Huy V. TRAN was indicted by a Federal Grand Jury on April 16, 2015. **Vehicle No. 6** is used by Huy V. TRAN in furtherance of the TRAN and VU drug trafficking activities. **Residence No. 3** is mentioned herein at paragraph 116. **Vehicle No. 6** is mentioned herein at paragraphs 114, 115 and 116.

1 **D. Residence And Vehicle Associated With Patrick WONG.**

2 **Residence No. 4** – 1802 19th Avenue South, Seattle, Washington;

3 **Vehicle No. 7** – Blue 1998 Nissan Quest van WA/AKL1020.

4 9. **Residence No. 4** is the residence of Patrick WONG. Patrick WONG
5 supplies controlled substances to the TRAN and VU DTO. Patrick WONG is also
6 responsible for distributing controlled substances. Patrick WONG was indicted by a
7 Federal Grand Jury on April 16, 2015. **Vehicle No. 7** is used by Patrick WONG in
8 furtherance of the TRAN and VU drug trafficking activities. **Residence No. 4** is
9 mentioned herein at paragraph 112. **Vehicle No. 7** is mentioned herein at paragraphs 38,
10 42, 44, 105, 121 and 122.

11 **E. Residence And Vehicle Associated With Son T. NGUYEN.**

12 **Residence No. 5** – 11115 59th Avenue South, Seattle, Washington;

13 **Vehicle No. 8** – White 1999 Ford Expedition WA/ALD1402.

14 10. **Residence No. 5** is the residence of Son T. NGUYEN. Son T. NGUYEN
15 assists TRAN in distributing controlled substances. Son T. NGUYEN was indicted by a
16 Federal Grand Jury on April 16, 2015. **Vehicle No. 8** is used by Son T. NGUYEN in
17 furtherance of the TRAN and VU drug trafficking activities. **Residence No. 5** is
18 mentioned herein at paragraphs 135, 140, 141 and 143. **Vehicle No. 8** is mentioned
19 herein at paragraphs 142 and 143.

20 **F. Residence And Vehicles Associated With Tam C. NGUYEN.**

21 **Residence No. 6** – 12023 46th Avenue South, Tukwila, Washington;

22 **Vehicle No. 9** – Green 1993 Toyota Camry WA/AAT9509;

23 **Vehicle No. 10** – Gray 2005 Toyota Sienna WA/AIV0209.

24 11. **Residence No. 6** is the residence of Tam C. NGUYEN. Tam C. NGUYEN
25 assists Tuan A. VU and Cuong T. LE in supplying and distributing control substances.
26 **Residence No. 6** is also where Tuan A. VU's significant other resides. As a result, Tuan
27 A. VU frequently travels and stays overnight at this residence. Tam C. NGUYEN was
28

indicted by a Federal Grand Jury on April 16, 2015. **Vehicle No. 9** is used by Tam C. NGUYEN and **Vehicle No. 10** is sometimes used by Tuan A. VU in furtherance of the TRAN and VU drug trafficking activities. **Residence No. 6** is mentioned herein at paragraphs 150 and 151. **Vehicle No. 9** is mentioned herein at paragraphs 118, 147, 148 and 149. **Vehicle No. 10** is mentioned herein at paragraphs 111 and 151.

G. Residence And Vehicles Associated With Kenneth W. THOMAS.

Residence No. 7 – 4700 South 172nd Place, SeaTac, Washington;

Vehicle No. 11 – Burgundy 1992 Ford Pickup WA/B72126G;

Vehicle No. 12 – Silver 1996 Mitsubishi Eclipse WA/AQA6399.

12. **Residence No. 7**, the residence of Kenneth W. THOMAS. Kenneth W. THOMAS is a frequent redistributor of controlled substances to Son V. TRAN and a controlled substance distributor. Kenneth W. THOMAS was indicted by a Federal Grand Jury on April 16, 2015. **Vehicle No. 11** and **Vehicle No. 12** are used by Kenneth W. THOMAS in support of illegal drug trafficking activities. **Residence No. 7** is mentioned herein at paragraphs 175 and 176. **Vehicle No. 11** is mentioned herein at paragraph 174 and 176. **Vehicle No. 12** is mentioned herein at paragraphs 175 and 176.

H. Residence Associated With Steven J. CONNELL.

Residence No. 8 – 10202 Myers Way South, Seattle, Washington.

13. **Residence No. 8** is the residence of Steven J. CONNELL. Steven J. CONNELL is a frequent redistributor of controlled substances to Son v. TRAN and a controlled substance distributor. Steven J. CONNELL was indicted by a Federal Grand Jury on April 16, 2015. **Residence No. 8** is mentioned herein at paragraphs 96, 185 and 186.

I. Residence And Vehicles Associated With Donald K. JORDAN.

Residence No. 9 – 13717 Linden Avenue North #225, Seattle, Washington;

Vehicle No. 13 – White 1999 Mercury Mountaineer WA/ATG2524;

Vehicle No. 14 – Silver 2004 Kia Temp#1666027A.

14. **Residence No. 9** is the residence of Donald K. JORDAN. Donald K. JORDAN is a frequent redistributor of controlled substances for the DTO. Donald K. JORDAN was indicted by a Federal Grand Jury on April 16, 2015. **Vehicle No. 13** and **Vehicle 14** are used by Donald K. JORDAN in support of illegal drug trafficking activities. **Residence No. 9** is mentioned herein at paragraphs 179 and 180. **Vehicle No. 13** is mentioned herein at paragraph 177. **Vehicle No. 14** is mentioned herein at paragraph 178.

J. Residence And Vehicles Associated With Vinh Q. NGUYEN.

Residence No. 10 – 12005 76th Avenue South, Seattle, Washington;

Vehicle No. 15 – Silver 2006 Honda Civic WA/ANC2840.

15. **Residence No. 10** is the residence of Vinh Q. NGUYEN. Vinh Q. NGUYEN is also a frequent controlled substances redistributor for Son v. TRAN. Vinh Q. NGUYEN was indicted by a Federal Grand Jury on April 16, 2015. **Vehicle No. 15** is used by Vinh Q. NGUYEN in support of illegal drug trafficking activities. **Residence No. 10** is mentioned herein at paragraphs 167, 168 and pages 56 and 57 fn. 4. **Vehicle No. 15** is mentioned herein at paragraphs 165, 166, 168 and page 56 fn. 4.

K. Residence Associated With Phuong A. NGUYEN.

Residence No. 11 – 12235 Southeast 206th Street, Kent, Washington

16. **Residence No. 11** is the residence of Phuong A. NGUYEN. Phuong A. NGUYEN is a frequent controlled substance redistributor for the TRAN and VU DTO and a controlled substance distributor. Phuong A. NGUYEN was indicted by a Federal Grand Jury on April 16, 2015. **Residence No. 11** is mentioned herein at paragraphs 134, 136, 146, 207, 208, 209 and 210.¹

¹ As set forth in greater detail below, I respectfully request authorization to execute the search warrant at this particular location at any hour, without first knocking and announcing law enforcement's presence, due to significant officer safety concerns.

1 **L. Residence and Vehicle Associated With Giang T. NGO.**

2 **Residence No. 12** – 643 Southwest 122nd Street, Burien, Washington;

3 **Vehicle No. 16** – Blue 1999 Ford Taurus Station Wagon WA/AHN7422.

4 17. **Residence No. 12** is the residence of Giang T. NGO. Giang T. NGO is a
5 frequent controlled substance redistributor for Son V. TRAN. Giang T. NGO was
6 indicted by a Federal Grand Jury on April 16, 2015. **Vehicle No. 16** is used by Giang T.
7 NGO in support of illegal drug trafficking activities. **Residence No. 12** is mentioned
8 herein at paragraphs 171 and 176. **Vehicle No. 16** is mentioned herein at paragraphs 169
9 and 171.

10 **M. Residence Associated With Cuong T. LE.**

11 **Residence No. 13** – 31234 8th Avenue South, Federal Way, Washington.

12 18. **Residence No. 13** is the residence of Cuong T. LE. Cuong T. LE is a close
13 associate to the TRAN and VU DTO and assists Tuan A. VU with supplying,
14 transporting, distributing, and selling controlled substances. Cuong T. LE was indicted
15 by a Federal Grand Jury on April 16, 2015. **Residence No. 13** is mentioned herein at
16 paragraphs 64, 68, and 120. **Business No. 1** is mentioned herein at paragraphs 102, 196,
17 197, 200 and 202. **Vehicle No. 17** is mentioned herein at paragraph 191.

18 **N. Residence And Vehicles Associated With Niem H. DOAN.**

19 **Residence No. 14** – 11607 7th Avenue Southeast, Everett, Washington;

20 **Business No. 1** – 19411 Highway 99, Lynnwood, Washington;

21 **Vehicle No. 17** – Silver 2013 Mercedes C300 WA/AMG3957.

22 19. **Residence No. 14** is the residence of Niem H. DOAN. Niem H. DOAN is
23 narcotic supplier to the TRAN and VU DTO. Niem H. DOAN was indicted by a Federal
24 Grand Jury on April 16, 2015. **Vehicle No. 17** is used by Niem H. DOAN in support of
25 illegal drug trafficking activities. Niem H. DOAN has been known to store narcotics at
26 **Business No. 1. Residence No. 14** is mentioned herein at paragraphs 195, 196, 200 and
27

1 201. **Business No. 1** is mentioned herein at paragraphs 102, 196, 197 and 200. **Vehicle**
2 **No. 17** is mentioned herein at paragraph 191.

3 O. **Residence And Vehicle Associated With Donald C. SCHOLOFF.**

4 **Residence No. 15** – 23916 Highway 99 Room #28 (Golden West Motel),
5 Edmonds, Washington;

6 **Vehicle No. 18** – Green 1997 Chevrolet T10 PU WA/C49136C.

7 20. **Residence No. 15** is the residence of Donald C. SCHOLOFF. Donald C.
8 SCHOLOFF is a frequent narcotic redistributor to Cuong T. LE and Tuan A. VU.
9 Donald C. SCHOLOFF was indicted by a Federal Grand Jury on April 16, 2015. **Vehicle**
10 **18** is used by Donald C. SCHOLOFF in support of illegal drug trafficking activities.
11 **Residence No. 15** is mentioned herein at paragraph 183. **Vehicle No. 18** is mentioned
12 herein at paragraphs 181 and 182.

13 P. **Vehicle Associated With KIMBERLE S. ALOJASIN, aka Kimberle S.**
14 **Nguyen.**

15 **Vehicle No. 19** – Black 2011 Toyota Camry WA/AFK7948.

16 21. Kimberle S. ALOJASIN is frequent narcotic redistributor for Son V.
17 TRAN. Kimberle S. ALOJASIN was indicted by a Federal Grand Jury on April 16,
18 2015. **Vehicle No. 19** is used by Kimberle S. ALOJASIN in support of illegal drug
19 trafficking activities. **Vehicle No. 19** is mentioned herein at paragraphs 187 and 188.

20 Q. **Vehicle Associated With Phuong H. NGUYEN.**

21 **Vehicle No. 20** – Silver 2000 Honda CRV WA/ALD8415.

22 22. **Vehicle No. 20** is used by Phuong H. NGUYEN in support of illegal drug
23 trafficking activities. Phuong H. NGUYEN is a frequent controlled substance
24 redistributor for Son V. TRAN. Phuong H. NGUYEN was indicted by a Federal Grand
25 Jury on April 16, 2015. **Vehicle No. 20** is mentioned herein at paragraphs 172 and 173.
26
27
28

1 **R. Vehicle Associated With Tony V. NGUYEN**

2 **Vehicle No. 21** – White 2013 Mitsubishi Lancer WA/AOF2058.

3 23. **Vehicle No. 21** is used by Tony V. NGUYEN in support of illegal drug
4 trafficking activities. Tony V. NGUYEN is a frequent controlled substance redistributor
5 of Son V. TRAN and a controlled substance distributor. Tony V. NGUYEN was indicted
6 by a Federal Grand Jury on April 16, 2015. **Vehicle No. 21** is mentioned herein at
7 paragraphs 113, 203 and 204.

8 **SUMMARY OF PROBABLE CAUSE**

9 24. The FBI, ENTF, and SPD are currently investigating the TRAN and VU
10 DTO, and have been investigating Son V. TRAN, Tuan A. VU, Cuong T. LE and their
11 co-conspirators for the past two years. During the investigation, we have debriefed a
12 number of cooperating witnesses (CW) and cooperating informants (CI), conducted
13 numerous hours of surveillance, and utilized various other law enforcement techniques.
14 Based on the information we have learned thus far, Son V. TRAN, Tuan A. VU, and their
15 criminal enterprise is one of the largest and violent drug trafficking organizations
16 operating in Western Washington. It is believed the TRAN and VU DTO criminal
17 enterprise distributes approximately 15-20 kilograms of cocaine, 10-15 kilograms of
18 heroin and 5 kilograms of methamphetamine per month.

19 25. The investigation ultimately led to the use of court-authorized Title III wire
20 intercepts. In total, we have received authorization to intercept four different phone lines
21 to include:

22 a. TT1 (714) 227-7384, Son V. TRAN's cellular phone, intercepted
23 February 27, 2015 through March 28, 2015 (30-day authorization expired).

24 b. TT2 (206) 651-0928, Son V. TRAN's cellular phone, intercepted
25 February 27, 2015 through March 28, 2015 (30-day authorization expired).

26 c. TT3 (206) 201-4249, Tuan A. VU's cellular phone, intercepted
27 February 27, 2015 through March 5, 2015 (VU traveled out of the United States).
28

1 d. TT4 (206) 201-4252, Cuong T. LE's cellular phone, intercepted
2 March 19, 2015 through March 28, 2015 (LE dropped this telephone on or about March
3 28, 2015).

4 All four phones were used in furtherance of the TRAN and VU DTO drug
5 trafficking activities.

6 26. Since the federal investigation began in February 2013, in addition to Son
7 V. TRAN, Tuan A. VU, and Cuong T. LE, numerous other co-conspirators have been
8 identified and there are other co-conspirators that are known and unknown. In the last
9 two years, this investigation has determined all of these individuals are either re-
10 distributors associated with the TRAN and VU DTO or are assisting with obtaining and
11 distributing controlled substances. It is believed that Son V. TRAN, Tuan A. VU, and
12 Cuong T. LE and their co-conspirators are obtaining cocaine, heroin, and
13 methamphetamine to distribute, primarily from Northern and Southern California.

14 27. On April 16, 2015, Son V. TRAN, Tuan A. VU, Huy V. TRAN, Cuong T.
15 LE, Patrick WONG, Son T. NGUYEN, Tam C. NGUYEN, Brianna K. CARLSON, Yen
16 T. VU, Phuong A. NGUYEN, Duy P. NGUYEN, Vinh Q. NGUYEN, Giang T. NGO,
17 Phuong H. NGUYEN, Long V. TRUONG, Kenneth W. THOMAS, Donald K. JORDAN,
18 Daniel B. ALLEN, Donald C. SCHOLOFF, Steven J. CONNELL, Kimberle S.
19 ALOJASIN, and Niem H. DOAN were federally indicted in the Western District of
20 Washington for Conspiracy to Distribute Controlled Substances in violation of Title 21,
21 U.S.C. Sections 841(a)(1), 841(b)(1)(C), and 846.

22 28. Based on the investigation thus far there is probable cause to believe Son V.
23 TRAN, Tuan A. VU, Cuong T. LE, and their co-conspirators are involved in the
24 following federal offenses described above.

25 **BEGINNING OF INVESTIGATION**

26 29. In June 2011, Eastside Narcotics Task Force (ENTF) investigators began
27 the investigation by using informants to purchase amounts of narcotics and a firearm
28 from Tuan A. VU and Minh Hoang. These investigations lead to residential search

1 warrants on Tuan A. VU and Minh Hoang; however, detectives recovered only small
2 amounts of narcotics at each residence. The informant later advised detectives they did
3 not locate hidden narcotics, firearms, and currency at Tuan A. VU's and Minh Hoang's
4 respective residences. Further investigation identified Dung Tran as one of Tuan A.
5 VU's narcotic distributors and detectives recovered more than 78 grams of crack cocaine
6 from Dung Tran. Detectives also identified Ty V. Trieu as one of Tuan A. VU's
7 interstate narcotic shippers. Investigators then focused their investigation on Patrick
8 WONG, recovering more than 11 grams of crack cocaine and \$13,000 US currency
9 (hereafter USC) from Patrick WONG. Detectives identified Phong T. Tong and Hieu C.
10 Phan as TRAN and VU DTO associates and recovered a small amount of cocaine, a
11 firearm, and \$16,000 USC from Hieu C. Phan during a traffic stop. An informant later
12 advised detectives they did not locate approximately three kilograms of cocaine in Hieu
13 C. Phan's vehicle during the search.

14 30. In February 2013, FBI and SPD joined forces with ENTF detectives to
15 target the TRAN and VU DTO for a larger scale conspiracy investigation. Investigators
16 determined the TRAN and VU DTO was responsible for selling kilogram amounts of
17 cocaine, methamphetamine, heroin and trafficking firearms. Members of the TRAN and
18 VU DTO were identified as the main narcotic suppliers to other Vietnamese narcotic
19 distributors as well as supplying narcotics to other organizations throughout Western
20 Washington.

21 31. The FBI, ENTF, and SPD have been investigating the TRAN and VU DTO
22 for two years. As set forth elsewhere in this affidavit, the investigation has included the
23 use of a number of Cooperating Witnesses (hereafter "CWs"). During the investigation,
24 the CWs have been able to conduct several controlled narcotic and firearm purchases
25 from Son V. TRAN, Tuan A. VU, and their associates. To date, case agents have
26 completed controlled purchases from Son V. TRAN (one controlled narcotic purchase),
27 Tuan A. VU (five controlled narcotic purchases), Cuong T. LE (one controlled narcotic
28 purchase and one interstate narcotic interdiction), and Patrick WONG (three controlled

1 narcotic purchases). In many instances, investigators have been able to confirm Son V.
2 TRAN and Tuan A. VU were the source of supply for the controlled purchases.

3 32. Investigators also have reason to believe many of the targets of this
4 investigation are involved with firearms, despite many being prohibited from possessing
5 firearms. For example, case agents learned that TRAN and VU DTO associate Tuan H.
6 TRAN was working as a narcotic distributor for Son V. TRAN and also supplying TRAN
7 and VU DTO members with firearms. Case agents learned that between June 27, 2013
8 and May 7, 2014, Tuan H. Tran had been stopped and subsequently arrested during four
9 separate incidents where officers recovered a handgun from Tuan H. Tran during each
10 stop. During two of the arrests, officers also recovered amounts of controlled substances
11 from Tuan H. Tran. On July 17, 2014, I obtained a federal arrest warrant for Tuan H.
12 Tran for the firearms and narcotic possessions. On August 12, 2014, case agents arrested
13 Tuan H. Tran in the Seattle area. Subsequently, Tuan H. Tran has plead guilty to these
14 crimes (*U.S. v. Tran, CR14-264MJP*).

15 33. Additionally, on July 14, 2014, case agents received information at least
16 one TRAN and VU DTO member was in "The Jungle" firing a firearm. The Jungle is an
17 area of downtown Seattle controlled by the TRAN and VU DTO where homeless people
18 live and significant street-level narcotic distribution occurs along with violent acts such
19 as murders, assaults, rapes, and robberies. On July 14, 2014, Washington State Patrol
20 Detective F.B. Olsen and I arrived in the area and observed Duy P. NGUYEN and
21 another associate exiting The Jungle. We stopped Duy P. NGUYEN and his associate
22 and, during the stop, investigators recovered a handgun and narcotics from Duy P.
23 NGUYEN. Duy P. NGUYEN later waived his *Miranda* rights and stated that Tuan H.
24 TRAN had provided the handgun and narcotics to Duy P. NGUYEN.

25 **PROBABLE CAUSE DERIVED FROM CW#1 PRIOR TO T-III INTECEPTION**

26 34. As set forth elsewhere in this affidavit, the investigation has included the
27 use of a number of CWs and CSs. During the investigation, the CWs have been able to
28 purchase drugs from Son V. TRAN, Tuan A. VU, Cuong T. LE, and Patrick WONG. In

1 many instances, law enforcement has been able to confirm that Son V. TRAN or Tuan A.
2 VU were the source of supply for the associate.

3 35. From the beginning of this investigation to present, CW#1 has provided
4 significant information regarding Son V. TRAN and Tuan A. VU and their associates.
5 CW#1 has also purchased amounts of narcotics, arranged multiple kilogram transactions
6 and assisted case agents in enforcement actions against the TRAN and VU DTO.² CW#1
7 has known Tuan A. VU for several years. During this time period, CW#1 had first-hand
8 knowledge of Tuan A. VU's drug trafficking activities. CW#1 has known Son V.
9 TRAN's brother, Huy V. TRAN, for a similar period of time, and is familiar with his
10 narcotic's trafficking activities as well. As a result, CW#1 has more recently become
11 generally familiar with Huy V. TRAN's own narcotic's trafficking activities, although
12 CW#1 is not close to Huy V. TRAN.

13 **February 13, 2013: CW#1 Controlled Narcotic Purchase From Tuan A. VU**

14 36. On February 13, 2013, under the supervision and control of law
15 enforcement agents, CW#1 purchased approximately 28 grams of crack cocaine from
16 Tuan A. VU in exchange for \$1,300 in Seattle, WA.

17 37. Specifically, on February 13, 2013, CW#1 arranged to meet one of Tuan A.
18 VU's associates, Phong T. Tong, at a Seattle residence. As CW#1 arrived, Phong T.
19 Tong advised CW#1 that Tuan A. VU was coming to deliver the crack cocaine.
20 Investigators observed Tuan A. VU arrive driving a silver BMW. Tuan A. VU met with
21 CW#1 and sold CW#1 the crack cocaine. During the controlled narcotic purchase, case
22 agents fitted CW#1 with a concealed video (but not audio) recorder. The substance Tuan
23 A. VU delivered to CW#1 field-tested positive for the presence of cocaine.

24
25
26 ² CW#1 has been proven reliable in the past. CW#1 has made more than 25 controlled substance purchases
27 that have tested positive for a controlled substance for the SPD, ENTF, DEA, and FBI. CW#1's controlled narcotic
28 purchases and activity have resulted in more than seven completed and ongoing narcotic trafficking investigations.
CW#1 is also familiar with controlled substances with more than 20 years of personal use and/or association with
persons who use/sell controlled substances. CW#1 has no known criminal history. Investigators pay CW#1 for
his/her services

**February 27, 2013: CW#1 Controlled Narcotic Purchase From Patrick WONG,
Facilitated By Tuan A. VU**

38. On or about February 27, 2013, under the supervision and control of law enforcement agents, CW#1 purchased 28 grams of crack cocaine from Tuan A. VU's associate, Patrick WONG, in exchange for \$1,250 prerecorded buy money. Tuan A. VU arranged and facilitated the transaction; when CW#1 initially called Tuan A. VU to purchase the narcotics, Tuan A. VU instructed CW#1 to contact Patrick WONG to purchase the crack cocaine. Investigators observed CW#1 meet with Patrick WONG. WONG was driving his blue 1998 Nissan Quest van bearing license AKL1020 (detailed above as **Vehicle No. 7**). Patrick WONG sold CW#1 the crack cocaine. During the controlled narcotic purchase, case agents fitted CW#1 with a concealed audio recorder. The substance Patrick WONG delivered to CW#1 field-tested positive for the presence of cocaine.

April 2, 2013: CW#1 Controlled Narcotic Purchase From Tuan A. VU

39. On or about April 2, 2013, under the supervision and control of law enforcement agents, CW#1 purchased 29 grams of crack cocaine directly from Tuan A. VU in exchange for \$1,250.

40. Specifically, on April 2, 2013, CW#1 and Tuan A. VU arranged to meet at a Seattle business to conduct the narcotic transaction. Investigators observed CW#1 meet Tuan A. VU at the meeting location where VU sold CW#1 the crack cocaine. Tuan A. VU was driving a silver BMW. During the controlled purchase, case agents fitted CW#1 with a concealed audio recorder. The substance Tuan A. VU delivered to CW#1 field-tested positive for the presence of cocaine.

August 30, 2013: CW#1 Controlled Narcotic Purchase From Patrick WONG

41. On or about August 30, 2013, under the supervision and control of law enforcement agents, CW#1 purchased 28 grams of crack cocaine from Tuan A. VU's associate/co-conspirator Patrick WONG in exchange for \$1,150.

42. Specifically, on or about August 29 and 30, 2013, CW#1 contacted Patrick WONG on his cellular phone, (206) 349-9468 to arrange the illegal narcotic transaction. Patrick WONG agreed to conduct the crack cocaine transaction the following day. On August 30, 2013, Patrick WONG and CW#1 agreed to meet at a business near Patrick WONG's Seattle residence. Surveillance detectives observed Patrick WONG exit his residence and arrive at CW#1's location, alone, driving the blue Nissan van (**Vehicle No. 7**) where Patrick WONG sold CW#1 the crack cocaine. During the controlled purchase, case agents fitted CW#1 with a concealed audio recorder. The substance Patrick WONG delivered to CW#1 field-tested positive for the presence of cocaine.

December 2, 2013: CW#1 Controlled Narcotic Purchase From Patrick WONG

43. On or about December 2, 2013, under the supervision and control of law enforcement agents, CW#1 purchased approximately 28 grams of crack cocaine from Patrick WONG in exchange for \$1,100.

44. Specifically, on December 1 and 2, 2013, CW#1 contacted Patrick WONG on a new phone number for Patrick WONG, (206) 504-8070, to arrange the controlled purchase. Patrick WONG agreed to conduct the crack cocaine transaction the following day. Specifically, on December 2, 2013, Patrick WONG and CW#1 agreed to meet at a business near Patrick WONG's Seattle residence. Surveillance detectives observed Patrick WONG exit his residence and arrive at CW#1's location alone driving his blue Nissan van (**Vehicle No. 7**) where Patrick WONG sold CW#1 the crack cocaine. During the controlled purchase, case agents fitted CW#1 with a concealed audio recorder. The substance Patrick WONG delivered to CW#1 field-tested positive for the presence of cocaine.

December 2 and 3, 2013: CW#1 Controlled Narcotic Purchases From Tuan A. VU

45. On or about December 3, 2013, under the supervision and control of law enforcement agents, CW#1 purchased 28 grams of crack cocaine from Tuan A. VU in exchange for \$1,100.

46. Specifically, on December 2, 2013, CW#1 met with Tuan A. VU at a Seattle area business where the two conversed about CW#1 purchasing additional amounts of crack cocaine from Tuan A. VU. Tuan A. VU agreed to sell CW#1 an ounce of crack cocaine for \$1,100 the following day. Tuan A. VU also provided CW#1 with his new phone number, (206) 258-9496. Following the transaction, CW#1 reported that Tuan A. VU and Patrick WONG were feuding because Patrick WONG took Tuan A. VU's drug customers while VU was in jail in the summer of 2013. Tuan A. VU attempted to recruit CW#1 to assault Patrick WONG because of their feud. CW#1 declined and ended the meeting.

47. On December 3, 2013, CW#1 called Tuan A. VU to arrange the second controlled purchase and the two agreed to meet at a location in Seattle. Case agents observed Tuan A. VU meet with CW#1 and sell CW#1 the crack cocaine. Tuan A. VU was driving a green BMW.

48. During the meeting, Tuan A. VU told CW#1 he was selling high purity black tar heroin if CW#1 wanted to buy any. CW#1 asked Tuan A. VU if he sold guns. Tuan A. VU stated he did not, but knew someone that did if need be. During the controlled purchase, case agents fitted CW#1 with a concealed audio recorder. The substance Tuan A. VU delivered to CW#1 field-tested positive for the presence of cocaine.

December 28, 2013: Information From CW#1 Regarding Tuan A. VU's Narcotic Trafficking

49. On or about December 28, 2013, Detective Olsen and I met with CW#1. CW#1 stated that CW#1 met with Tuan A. VU on December 27, 2013, at a Seattle area Vietnamese restaurant. During this meeting, Tuan A. VU showed CW#1 a baggie containing approximately 1 ounce of crystal methamphetamine and asked CW#1 to buy some. CW#1 told Tuan A. VU that he/she would let him know later. Tuan A. VU and CW#1 had a further conversation during which Tuan A. VU told CW#1 that Tuan A. VU could traffic up to 5 kilograms of cocaine per week and could get the kilograms for

1 \$28,000 per kilogram. Tuan A. VU wanted to know if CW#1 had any high-level
2 customers to whom Tuan A. VU could sell the cocaine. Tuan A. VU told CW#1 that
3 Tuan A. VU intends to send the cocaine he obtains to potential customers in California.
4 Phone tolls analysis of (206) 258-9496 (a phone then used by Tuan A. VU) showed
5 communication between Tuan A. VU and CW#1's known phone on December 27, 2013,
6 corroborating CW#1's account.

7 **April 25, 2014: CW#1 Controlled Narcotic Purchase From Cuong T. LE,**
8 **Facilitated By Tuan A. VU**

9 50. On or about April 25, 2014, under the supervision and control of law
10 enforcement agents, CW#1 purchased 29.1 grams of crack cocaine from Cuong T. LE.
11 The controlled purchase was facilitated by Tuan A. VU.

12 51. The previous day, April 24, 2014, CW#1 had a consensually recorded
13 conversation with Tuan A. VU on (206) 258-9496. Tuan A. VU agreed to meet CW#1
14 the following day to sell one ounce of crack cocaine for \$1,100.

15 52. On April 25, 2014, CW#1 talked to Tuan A. VU on (206) 258-9496 and
16 Tuan A. VU stated he is too tired to leave but will send "Cuong" to meet CW#1 and sell
17 the ounce of crack cocaine. CW#1 and case agents knew "Cuong" to be Cuong T. LE.
18 Case agents had a tracking warrant for Tuan A. VU's phone and determined the phone
19 was at or near Tuan A. VU's Seattle residence (a previous Seattle area residence known
20 to case agents). ENTF detectives observed Cuong T. LE leave Tuan A. VU's residence
21 and drive to meet CW#1. CW#1 and Cuong T. LE met and Cuong T. LE sold CW#1 the
22 ounce of crack cocaine for \$1,100. Cuong T. LE then returned to Tuan A. VU's
23 residence.

24 53. CW#1 stated during his/her conversation with Cuong T. LE during the
25 transaction Cuong T. LE provided his phone number as (206) 602-4638. Cuong T. LE
26 also mentioned to CW#1 he was looking for drug customers in California and asked if
27 CW#1 might be able to introduce customers to Cuong T. LE and Tuan A. VU. CW#1
28 also stated Cuong T. LE and Tuan A. VU are doing drug business together and CW#1

1 believed Cuong T. LE was living at Tuan A. VU's residence. Cuong T. LE also indicated
2 he had a marijuana grow.

3 54. CW#1 also reported Cuong T. LE might be the paper owner of "108"
4 Vietnamese Restaurant, 11814 E Valley Highway, Kent. CW#1 knows this restaurant to
5 be controlled by Hong V. Nguyen, and Hong V. Nguyen's sister, Nhi T. Nguyen, who
6 Cuong T. LE used to date. CW#1 added while Cuong T. LE was dating Nhi T. Nguyen,
7 Cuong T. LE put Nhi T. Nguyen into debt approximately \$500,000 through fraudulent
8 business transactions, illegal sports gambling, and casino gambling. CW#1 added the
9 Vietnamese business community knows Cuong T. LE as a chronic gambler, high-level
10 narcotic supplier, and fraudulent money transaction suspect. During the controlled
11 purchase, case agents fitted CW#1 with a concealed audio recorder. The substance
12 Cuong T. LE delivered to CW#1 field-tested positive for the presence of cocaine.

13 **April 25, 2014: CW#1 Controlled Narcotic Purchase From Son V. TRAN And Huy**
14 **V. TRAN.**

15 55. On or about April 25, 2014, under the supervision and control of law
16 enforcement agents, CW#1 purchased 34 grams of crack cocaine from Son V. TRAN and
17 Huy V. TRAN for \$1,200. The previous day, on April 24, 2014, CW#1 had a recorded
18 conversation with Son V. TRAN on his then phone, (206) 765-7486, during which Son.
19 V. TRAN agreed to meet CW#1 the following day to sell CW#1 one ounce of crack
20 cocaine for \$1,100.

21 56. On April 25, 2014, case agents had CW#1 place a series of consensually
22 recorded phone calls and text messages to Son V. TRAN at (206) 765-7486 to arrange the
23 transaction. During one of the calls, Son V. TRAN questioned CW#1 about what CW#1
24 planned on doing with the crack cocaine. CW#1 provided a satisfactory response.
25 During another call, Son V. TRAN told CW#1 the cost of the ounce of crack cocaine was
26 going to be \$1,200 not \$1,100.

27 57. Son V. TRAN and CW#1 agreed to meet at a business parking lot in
28 Renton, WA. Minutes later, detectives observed Son V. TRAN arrive at the location

1 driving the white 2007 Cadillac Escalade bearing license APZ1179 (listed above as
2 **Vehicle No. 1**), accompanied by Huy V. TRAN. Son V. TRAN met and sold CW#1 the
3 crack cocaine and Huy V. TRAN retrieved the \$1,200 from CW#1. Detectives took
4 several photographs and video of this meeting.

5 58. CW#1 stated he/she has known Huy V. TRAN for approximately twenty
6 years and knows Huy V. TRAN to be a high-level narcotic trafficker. While case agents
7 met with CW#1 following the controlled purchase, CW#1 received a phone call from
8 Huy V. TRAN from phone number, (206) 877-2489. Huy V. TRAN told CW#1 he was
9 interested in knowing if CW#1 had a supplier of cocaine Huy V. TRAN could use. Huy
10 V. TRAN indicated he and his brother, Son V. TRAN, wanted to purchase 3-5 kilograms
11 of cocaine from CW#1 immediately. CW#1 told Huy V. TRAN they would talk later
12 about that transaction.

13 **Tuan A. VU Calls CW#1 Regarding Buying Narcotics From Tuan A. VU And Son**
14 **V. TRAN In The Same Day.**

15 59. On April 25, 2014, following the controlled purchase from Son V. TRAN
16 and Huy V. TRAN, CW#1 stated he/she received a phone call from Tuan A. VU during
17 which Tuan A. VU asked CW#1 about why CW#1 purchased crack cocaine from Tuan
18 A. VU and then Son V. TRAN in the same day. CW#1 was able to provide adequate
19 responses as to why he/she purchased crack cocaine from Tuan A. VU and Son V. TRAN
20 on the same day. However, investigators believe that this phone call showed the
21 conspiracy between Tuan A. VU and Son V. TRAN to distribute narcotics.

22 **CW#1 Arranges Seven Multiple Kilogram Transactions Between California**
23 **Narcotic Source And Tuan A. VU. Cuong T. LE Transports The Currency And**
24 **Narcotics.**

25 60. Between May and September 2014, case agents used CW#1 to identify a
26 new narcotic supply source to the DTO. During this time, case agents learned that Tuan
27 A. VU and Cuong T. LE purchased kilogram amounts of cocaine, methamphetamine, and
28 heroin from an identified narcotic source and his associate in Oakland, California. Cuong

1 T. LE, working on behalf of Tuan A. VU, transported the currency to California and the
2 narcotics back to Seattle via a vehicle. CW#1 and CW#6 later reported that Son V.
3 TRAN would receive narcotics from Tuan A. VU to distribute throughout Washington
4 State.

5 61. For several weeks leading up to late June, 2014, Son V. TRAN and Tuan A.
6 VU continually recruited CW#1 to arrange an introduction to an Oakland narcotic
7 supplier CW#1 knew. CW#1 told case agents about Son V. TRAN and Tuan A. VU's
8 desire to purchase kilogram amounts of narcotics from the Oakland narcotic supplier.
9 Case agents instructed CW#1 not to entice or entrap Son V. TRAN or Tuan A. VU or
10 their co-conspirators but rather wait until Son V. TRAN or Tuan A. VU contacted CW#1
11 to arrange the meetings. Additionally, case agents repeatedly instructed CW#1 only to
12 introduce members of the Son V. TRAN and VU DTO to the Oakland narcotic suppliers
13 but not to engage in the narcotic transactions through handling any money or narcotics.
14 Case agents also instructed CW#1 if he/she received any compensation from any party in
15 the transaction to inform and provide the compensation to case agents and agents would
16 provide CW#1 the comparable compensation received. CW#1 reported he/she was not
17 compensated from any party involved in the narcotic transactions. CW#1 met with Tuan
18 A. VU and Cuong T. LE (at their request) regarding purchasing narcotics from the
19 Oakland narcotic suppliers.

20 62. Case agents learned Tuan A. VU financed the narcotic purchases and
21 Cuong T. LE traveled between Seattle and Oakland with currency and transported
22 narcotics back to Seattle to be distributed throughout Western Washington.

23 63. During this period, CW#1 arranged seven known meeting between Cuong
24 T. LE and the Oakland narcotic supplier where Cuong T. LE, working directly with Tuan
25 A. VU, purchased approximately nine and a half kilograms of cocaine for approximately
26 \$270,000, approximately 8 pounds of methamphetamine for approximately \$80,000, and
27 approximately one and half kilograms of heroin for approximately \$15,000.

64. On July 27, 2014, after Cuong T. LE purchased five pounds of methamphetamine and one half kilogram of heroin from the Oakland narcotic supplier, Cuong T. LE traveled back to Washington. Case agents followed Cuong T. LE's movements through court authorized cellular phone GPS tracking. On July 28, 2014, surveillance observed Cuong T. LE drove to 31234 8th Avenue South, Federal Way (listed above as **Residence No. 13**). Per Washington Department of Licensing database, Cuong T. LE lists **Residence No. 13** as his residence as of November 12, 2014.

65. On August 28, 2014, after Cuong T. LE purchased three kilograms of cocaine from the Oakland narcotic supplier, Cuong T. LE traveled back to Washington and court authorized cellular phone GPS tracking showed LE within the vicinity of Tuan A. VU's residence, 5571 18th Avenue South Seattle (**Residence No. 2**).

66. On September 2, 2014, after Cuong T. LE purchased two kilograms of cocaine and one pound of methamphetamine from the Oakland narcotic supplier, Cuong T. LE traveled back to Washington and court authorized cellular phone GPS tracking showed Cuong T. LE within the vicinity of Tuan A. VU's residence, 5571 18th Avenue South Seattle (**Residence No. 2**).

67. In early September 2014, case agents coordinated a large-scale surveillance and enforcement operation to disrupt this narcotic supply route between Oakland and Seattle. CW#1 reported Cuong T. LE had Tuan A. VU's money and was driving to Oakland to purchase kilogram amounts of narcotics from the Oakland narcotic supplier. Case agents used court authorized GPS locates on Cuong T. LE's phone and a GPS tracking device on the transport vehicle to track the movements of Cuong T. LE as he traveled to Oakland.

68. On September 8, 2014, surveillance followed Cuong T. LE and CW#1 to 31234 8th Avenue South, Federal Way (**Residence No. 13**). LE entered the residence and CW#1 called investigators and stated Cuong T. LE was inside his residence making final preparations to travel to California. Cuong T. LE and CW#1 then traveled south towards California. Surveillance followed Cuong T. LE and CW#1 to central Washington and

1 then monitored their movements via GPS tracking on Cuong T. LE's cellular phone and a
2 court authorized vehicle tracking device.

3 69. Case agents also traveled to Oakland and conducted surveillance on the
4 transaction. On September 9, 2014, agents and detectives conducted surveillance of the
5 meeting between the Oakland narcotic supplier, Cuong T. LE and CW#1 that lasted
6 approximately two hours. During the early part of the surveillance (and from later CW#1
7 reporting) Cuong T. LE purchased two kilograms of cocaine from the Oakland narcotic
8 suppliers in exchange for \$66,000. One of the suppliers left the meeting location to
9 obtain additional narcotics at Cuong T. LE's request; however, one of the Oakland
10 suppliers observed the surveillance teams following him and refused to meet back with
11 Cuong T. LE. The Oakland narcotic supplier ultimately agreed to meet back with Cuong
12 T. LE and CW#1 but would only sell Cuong T. LE one additional pound of
13 methamphetamine because he was nervous about his associate observing surveillance
14 vehicles. Cuong T. LE ultimately met with the Oakland narcotic supplier (while being
15 observed by the surveillance team) and purchased the methamphetamine in exchange for
16 \$10,000. CW#1 arranged to be at the meet locations but did not participate in the
17 narcotics or currency exchange.

18 70. Within minutes of the transaction, the Oakland narcotic suppliers, Cuong T.
19 LE, and CW#1 met back at the original meeting location and case agents were able to get
20 portions of a consensually recorded meeting between these parties where they discussed
21 seeing the surveillance cars and no additional narcotics would be sold on that day.
22 Minutes later, Cuong T. LE and CW#1 left Oakland to drive back to Seattle. Earlier in
23 the drive, CW#1 contacted case agents and stated the two kilograms of cocaine and
24 pound of methamphetamine were concealed in the center console of the rental vehicle.

25 71. Surveillance teams between Oakland and Vancouver, WA maintained
26 constant surveillance of Cuong T. LE and CW#1 in the rental vehicle. Once Cuong T.
27 LE and CW#1 reached Vancouver, Washington, case agents directed local law
28 enforcement officers to stop the vehicle. Officers used a Narcotic Detection K9, which

1 received a positive response for narcotics in the vehicle and impounded the vehicle.

2 Cuong T. LE was released from the scene.

3 72. The following day, case agents secured a state search warrant for the rental
4 vehicle and recovered the two kilograms of cocaine (2,110 grams), one pound of
5 methamphetamine (470 grams) and \$10,000 USC concealed together in the center
6 console. Officers also recovered \$4,000 USC in Cuong T. LE's personal bag in the
7 vehicle. All narcotics seized during this portion of the investigation field-tested positive
8 for the presence of cocaine and methamphetamine, respectively.

9 73. CW#1 reported Cuong T. LE and CW#1 had several conversations with
10 Tuan A. VU on (206) 258-9496 informing him the police took the narcotics and money.
11 CW#1 reported Tuan A. VU was angry and questioned Cuong T. LE and CW#1 about
12 how law enforcement recovered the narcotics and money.

13 74. Approximately one hour after the vehicle stop in southern Washington,
14 Seattle investigators served a state search warrant on Tuan A. VU's residence, 5571 18th
15 Avenue South, Seattle (listed above as **Residence No. 2**). Tuan A. VU was not at home
16 during the service of the warrant. Officers recovered 222 grams of crack cocaine, 243
17 grams of heroin, 5 grams of methamphetamine, and \$2,158 US currency from Tuan A.
18 VU's residence. During the warrant service, Tuan A. VU's older sister and co-
19 conspirator Yen T. VU was at the residence with Tuan A. VU's juvenile (approximately
20 11 year old) daughter "Casey". However, at the time, investigators did not have probable
21 cause to believe Yen T. VU was involved in the conspiracy. Case agents later learned
22 from CW#1 that officers missed kilogram amounts of narcotics and tens of thousands of
23 dollars hidden in the crawl space of the residence.

24 **PROBABLE CAUSE DERIVED FROM CW#6 PRIOR TO T-III INTERCEPTION**

25 75. During the summer of 2014, detectives arrested CW#6 for narcotic
26 possession with intent to deliver. As set forth above, CW#6 is currently cooperating with
27 law enforcement in exchange for a reduced sentence. CW#6 identified other TRAN and
28

1 VU DTO members and their roles in the organization, and provided historical
2 information about the organization.³

3 76. Following CW#6's June 2014 arrest, CW#6 provided case agents an initial
4 intelligence interview regarding the TRAN and VU DTO. CW#6 stated Son V. TRAN is
5 the main leader of the TRAN and VU DTO. Huy V. TRAN, Son V. TRAN's brother,
6 works directly with Son V. TRAN. CW#6 stated he/she had been working directly for
7 Son V. TRAN for several years. Prior to his/her arrest, CW#6 was Son V. TRAN's
8 primary person to receive and distribute large amounts of narcotics and collect and pay
9 debts owed to Son V. TRAN.

10 77. CW#6 stated Son V. TRAN was getting cocaine from a supplier (later
11 identified as Lucino Martinez Cruz) who CW#6 frequently met in north Seattle or
12 Shoreline on behalf of Son V. TRAN. Son V. TRAN obtained several kilograms of
13 cocaine per week in exchange for approximately \$33,000 per kilogram, from Martinez
14 Cruz. CW#6 noted Martinez Cruz was unable to keep up with Son V. TRAN's demand.

15 78. CW#6 discussed a different cocaine supply source living in California (who
16 investigators know to be CW#1, discussed above). CW#6 stated the male from
17 California had a cocaine supply source, known to investigators, who provided Son V.
18 TRAN multiple kilograms of cocaine and other narcotics.

19 79. According to CW#6, Son V. TRAN was one of the largest cocaine
20 suppliers in the Seattle area but has continually insulated himself by using people like
21 CW#6 to reduce his exposure to law enforcement. Prior to CW#6's arrest, CW#6 was
22 selling two to three kilograms of cocaine every two days for Son V. TRAN.

23 80. TRAN and VU's DTO also sold firearms to support their illegal activity.
24 CW#6 identified "LT", known to be Tuan H. Tran, as the main firearm supplier among
25 the organization.

26
27 ³ CW#6's criminal history consists of eight arrests in King and Thurston County, WA between October 14,
28 2002 and summer of 2014. These arrests resulted in two felony convictions for VUCSA Possession with Intent to
Deliver in June 2010 and Residential Burglary in November 2002.

1 81. CW#6 discussed other TRAN and VU DTO members to include "Chico",
2 known to be Tuan A. VU, who worked directly with Son V. TRAN selling large amounts
3 of narcotics. CW#6 stated Tuan A. VU sold kilograms amounts of cocaine and was
4 supplying narcotics to Patrick WONG.

5 **June 2014: Son V. TRAN Relocated Evidence**

6 82. CW#6 later reported following his/her arrest on June 26, 2014, Son V.
7 TRAN learned of the arrests and questioned CW#6 about cooperating with law
8 enforcement. CW#6 was able to convince Son V. TRAN he was not cooperating but Son
9 V. TRAN feared law enforcement would arrest him next. Within an hour following
10 CW#6's arrest, Son V. TRAN left his residence with two kilograms of cocaine and
11 approximately \$100,000, which was moved to a different stash location. Son V. TRAN
12 also turned off his cellular phone so case agents could not track his phone. I examined
13 electronic surveillance at Son V. TRAN's residence and determined Son V. TRAN left
14 the residence in his black Mercedes SUV. I also examined Son V. TRAN's pen register
15 cellular phone GPS tracking and noticed Son V. TRAN turned off his phone, preventing
16 case agents from tracking his location. Son V. TRAN told CW#6 he would be getting a
17 new phone and vehicle for CW#6 to use in the future.

18 **June 30, 2014: CW#6 Recovers Stolen Firearm From "The Jungle"**

19 83. On June 30, 2014, CW#6 reported one of his duties while working directly
20 for Son V. TRAN was to control the narcotic and firearm sales in "The Jungle." CW#6
21 knows there were many firearms in "The Jungle" for TRAN and VU DTO associates to
22 use for violent crimes. Case agents conducted a controlled recovery of a firearm to verify
23 the veracity of CW#6's information regarding various firearms stored in this area. Case
24 agents searched CW#6, released CW#6 to "The Jungle," and approximately 10 minutes
25 later, CW#6 returned with a stolen handgun. CW#6 said that the handgun had been
26 buried in a strategic location for TRAN and VU DTO leaders to find.
27
28

July 2014: Tuan H. Tran Shoots Gun And Son V. TRAN Orders Guns Out Of “The Jungle”

84. On July 14, 2014, CW#6 stated Tuan H. Tran threatened people to pay drug debts and shot a gun towards people in “The Jungle” but did not hurt anyone (incident described above pertaining to Duy P. NGUYEN arrest). CW#6 immediately phoned case agents who responded to the area to look for Tuan H. Tran.

85. My search for Tuan H. Tran led to Duy P. NGUYEN’s arrest for a firearm and narcotics possession near “The Jungle” (detailed above). CW#6 stated Duy P. NGUYEN worked for the TRAN and VU DTO and Son V. TRAN learned of Duy P. NGUYEN’s arrest. CW#6 stated Son V. TRAN instructed TRAN and VU DTO associates in “The Jungle” area to remove their guns from the area because law enforcement was targeting the group.

October 8, 2014: CW#6 Gets 18 Ounces Of Cocaine From Steven J. CONNELL For Son V. TRAN

86. On October 8, 2014, I observed CW#6 arrive at and then leave Son V. TRAN’s Seattle residence via electronic surveillance. CW#6 called Detective Olsen and stated Son V. TRAN ordered CW#6 to go to a Seattle location and meet an unknown Hispanic male (later identified as Lucino Martinez-Cruz) source of narcotic supply, pick up 18 ounces of cocaine, and bring the cocaine back to Son V. TRAN.

87. CW#6 arranged to meet an individual, later identified as Steven J. CONNELL to give Steven J. CONNELL Son V. TRAN’s money for the narcotics. CW#6 provided Steven J. CONNELL’s phone number, (206) 669-1968. CW#6 added Son V. TRAN talked to Steven J. CONNELL on the phone to arrange narcotic transactions. Son V. TRAN contacted CW#6 and instructed CW#6 where to meet Steven J. CONNELL. CW#6 added he/she had communicated with Steven J. CONNELL directly, but Son V. TRAN mostly communicates directly with Steven J. CONNELL.

88. CW#6 stated after he/she provided Steven J. CONNELL with Son V. TRAN’s money, Steven J. CONNELL would go meet with the narcotic supply source,

1 Lucino MARTINEZ-CRUZ, provide the money, retrieve the narcotics, and return to
2 CW#6 with the purchased narcotics.

3 89. Immediately after leaving Son V. TRAN's residence, CW#6 stated Son V.
4 TRAN gave CW#6 \$19,640 to purchase the 18 ounces of cocaine. Detective Olsen met
5 with CW#6, observed the \$19,640 and determined CW#6 did not have any narcotics on
6 his person.

7 90. Detectives then followed CW#6 as he/she drove to a Seattle location where
8 Steven J. CONNELL re-directed CW#6 to the final meeting location at Dick's Drive-In,
9 111 NE 45th Street, Seattle. Detectives went to that location and observed Steven J.
10 CONNELL meet with CW#6 in Steven J. CONNELL's vehicle. Steven J. CONNELL
11 then left and CW#6 contacted detectives and stated he/she had given the money to Steven
12 J. CONNELL to purchase the cocaine.

13 91. Detectives observed Steven J. CONNELL meeting and getting Lucino
14 Martinez-Cruz's vehicle. Lucino Martinez-Cruz conducted counter-surveillance
15 maneuvers such as driving slow on residential streets and parking on the side of the road
16 in an attempt to detect law enforcement. Lucino Martinez-Cruz and Steven J.
17 CONNELL met for approximately 15 minutes. Steven J. CONNELL then re-contacted
18 CW#6 at CW#6's vehicle and handed CW#6 the cocaine. Steven J. CONNELL then
19 returned to his vehicle.

20 92. Detectives again met with CW#6 and observed and photographed the
21 cocaine CW#6 just purchased on behalf of Son V. TRAN. Case agents made a decision
22 to allow CW#6 to keep the cocaine and deliver it back to Son V. TRAN due to
23 extraordinary concerns about CW#6's safety from Son V. TRAN. Investigators feared if
24 they seized the purchased cocaine (based on previous actions by Son V. TRAN) CW#6
25 would be assaulted, threatened, possibly killed and at a minimum held financially
26 responsible for the resale value of the cocaine, approximately \$40,000.

27 93. Detectives followed Lucino Martinez-Cruz as he drove mostly back streets
28 to detect law enforcement surveillance. Detectives terminated surveillance Lucino

1 Martinez-Cruz to prevent compromising the investigation. This surveillance confirmed
2 Steven J. CONNELL met with Lucino Martinez-Cruz to supply 18 ounces of cocaine to
3 Son V. TRAN in support of the TRAN and VU DTO.

4 94. From reviewing electronic surveillance at Son V. TRAN's residence, case
5 agents observed CW#6 arrive at Son V. TRAN's Seattle residence (**Residence No. 1**) to
6 provide the purchased cocaine.

7 **October 15, 2014: Warrant Arrest Of Steven J. CONNELL, Narcotic Supplier To**
8 **Son V. TRAN**

9 95. Following the October 8, 2014, surveillance of Steven J. CONNELL, case
10 agents learned Steven J. CONNELL had an unrelated felony warrant for his arrest. Case
11 agents developed a plan to arrest Steven J. CONNELL to prevent Lucino Martinez-Cruz
12 from providing additional narcotics to the TRAN and VU DTO (and thereby potentially
13 dragging CW#6 into having to engage in further criminal activities to avoid being
14 compromised or harmed).

15 96. On October 15, 2014, detectives conducted surveillance at Steven J.
16 CONNELL's Seattle residence (**Residence No. 8**). Detectives observed Steven J.
17 CONNELL leave the residence and detectives ultimately arrested Steven J. CONNELL.
18 Incident the arrest, detectives recovered 8.5 grams crack cocaine, 1.3 grams
19 methamphetamine, and .6 grams of heroin in Steven J. CONNELL's belongings inside
20 the vehicle in which he was a passenger. The narcotics field-tested positive for the
21 presence of cocaine, methamphetamine, and heroin respectively.

22 **December 1, 2014: Tuan A. VU supplying narcotics to Son V. TRAN with new**
23 **narcotic supply**

24 97. On or about December 1, 2014, CW#6 told Detective Olsen he/she had a
25 face-to-face conversation with Son V. TRAN and Son V. TRAN told CW#6 that Tuan A.
26 VU and Son V. TRAN had a new narcotic supply source and Son V. TRAN was
27 purchasing amounts of narcotics from Tuan A. VU to distribute throughout the DTO.
28

January 5, 2015: Information from CW#6 regarding Phuong H. NGUYEN

98. On January 5, 2015, I debriefed CW#6 regarding Phuong H. NGUYEN's involvement with the TRAN and VU DTO. I showed CW#6 Phuong H. NGUYEN's Washington Department of License (DOL) photograph and CW#6 identified Phuong H. NGUYEN as "LJ". CW#6 stated Phuong H. NGUYEN frequently purchases multiple ounce level amounts of cocaine, heroin, and methamphetamine from Tuan A. VU. CW#6 stated he/she knows Phuong H. NGUYEN to supply his narcotics to street level distributors throughout "The Jungle" in Seattle. CW#6 provided Phuong H. NGUYEN's phone number of (206) 973-9847.

January 5, 2015: Information from CW#6 regarding Kenneth W. THOMAS

99. On January 5, 2015, I debriefed CW#6 regarding Kenneth W. THOMAS' involvement with the TRAN and VU DTO. I showed CW#6 Kenneth W. THOMAS' Washington DOL photograph and CW#6 identified Kenneth W. THOMAS as "Ken." CW#6 stated Kenneth W. THOMAS frequently purchases multiple ounce level amounts of cocaine and heroin from Son V. TRAN. CW#6 knew Kenneth W. THOMAS purchased one ounce of cocaine from Son V. TRAN on or about January 3, 2015. CW#6 stated he knew this fact because Son V. TRAN told CW#6 Kenneth W. THOMAS ordered and received the narcotics. CW#6 provided phone numbers for Kenneth W. THOMAS to be (206) 851-5458, and a previous number of (206) 602-4159. Pen register analysis for TT2 showed communication between Son V. TRAN and Kenneth W. THOMAS.

January 6, 2015: Information from CW#6 regarding TRAN and VU DTO

100. On January 6, 2015, case agents debriefed CW#6 regarding other TRAN and VU DTO members. I had previously conducted phone toll and pen register analysis on target phones for Son V. TRAN and Tuan A. VU's telephones TT1, TT2, and TT3 and identified various people who may be involved with the TRAN and VU DTO. I showed CW#6 Washington DOL photographs for several people. As described below, CW#6 then advised me of the each person's known involvement with the TRAN and VU DTO.

101. CW#6 identified Donald K. JORDAN as a Son V. TRAN customer. CW#6 stated Donald K. JORDAN typically purchased 2 ounces of powder cocaine at a time. CW#6 stated he/she has met with Donald K. JORDAN on multiple occasions to sell him narcotics on behalf of Son V. TRAN. CW#6 met Donald K. JORDAN at parking lot locations and neighborhoods in south Seattle and Renton. CW#6 provided Donald K. JORDAN's phone number of (206) 294-2418. Pen register analysis on TT1 showed communication between Son V. TRAN and Donald K. JORDAN.

102. CW#6 identified Niem H. DOAN as "Linh". I knew Niem H. DOAN owns a body shop in the Lynnwood, Washington area (**Business No. 1**). CW#6 knew Neim H. DOAN distributed narcotics for the TRAN and VU DTO in years past, but was not sure if Neim H. DOAN was still distributing narcotics. Neim H. DOAN is also an investigative target by DEA Tacoma, WA agents who suspect Neim H. DOAN is selling amounts of narcotics.

103. CW#6 identified Son T. NGUYEN as "nine fingers". CW#6 stated Son T. NGUYEN distributes narcotics for the TRAN and VU DTO, particularly Son V. TRAN. CW#6 knows Son T. NGUYEN lives in Skyway and has a marijuana grow in the back of his house. CW#6 also knows Son T. NGUYEN sells powder cocaine, crack cocaine, and heroin.

104. CW#6 has provided narcotics to Son T. NGUYEN on behalf of Son V. TRAN.

ADDITIONAL PROBABLE CAUSE FOR Son V. TRAN

June 7, 2013: Son V. TRAN surveillance and narcotic and currency seizure from Patrick WONG's residence

105. On or about June 7, 2013, ENTF detectives were conducting surveillance on Patrick WONG at his residence, 2338 16th Avenue S, Seattle. Detectives observed Patrick WONG coming and going to and from the residence in his 1998 Nissan Quest van WA/AKL1020 (**Vehicle No. 7**). Patrick WONG left the residence in the van on at least two occasions and conducted what appeared to be narcotic transactions with

1 unknown individuals. Detectives then observed Son V. TRAN arrive at Patrick WONG's
2 residence driving a known vehicle for Son V. TRAN at that time.

3 106. Son V. TRAN exited his vehicle with an empty shopping bag, went to his
4 trunk, manipulated items in his trunk, and appeared from the trunk with the same
5 shopping bag with weighted contents. Detectives noted Son V. TRAN was looking
6 around at his surroundings intently as if to see if anyone was watching him. Son V.
7 TRAN then went inside Patrick WONG's residence and stayed for approximately 7
8 minutes. Detectives observed Son V. TRAN walking back to his vehicle with the same
9 shopping bag but with lighter weighted contents and Son V. TRAN drove away.
10 Detectives directed a Seattle PD officer to conduct a traffic stop on Son V. TRAN.
11 During the stop, officers seized \$2,529 US currency from Son V. TRAN and officers
12 permitted Son V. TRAN to leave the scene. Detectives seized the vehicle for a search
13 warrant. A search of the Son V. TRAN's vehicle yielded 123.5 total grams of cocaine,
14 52.8 grams of crack cocaine, 40.3 total grams of heroin, 14.7 grams of
15 methamphetamine, and \$8,720 US currency from the same shopping bag. Based on this
16 surveillance and narcotic and currency seizure, and based on the detectives training and
17 experience, detectives suspect Son V. TRAN supplied Patrick WONG with an amount of
18 narcotics and Patrick WONG provided Son V. TRAN with the all or a portion of the
19 \$8,720 US currency seized.

20 **PROBABLE CAUSE DERIVED FROM TT1, TT2, TT3, and TT4**

21 107. Pertinent to this application, the Title III interception of wire
22 communications has bolstered the probable cause to search some of the locations
23 discovered during the early stages of the investigation, and also established probable
24 cause to search additional residences and vehicles. The following are examples of some
25 of the most pertinent intercepted calls on TT1, TT2, TT3, and TT4 as they pertain to
26 locations to be searched and items to be seized. Based on my training and experience and
27 knowledge of this investigation, I am familiar with the coded terminology DTO members
28 use in relation to narcotic and firearm conversations. Accordingly, I have interpreted

1 some of the code words below. The following locations (residences and businesses) are
2 all located in the Western District of Washington. Additionally, all vehicles unless
3 otherwise noted are registered in Washington State with Washington DOL. Search
4 warrants are sought for the following residences and vehicles relating to the following
5 individuals:

6 **Son V. TRAN – DTO leader and narcotic trafficker and supplier**

7 108. On March 19, 2015, agents intercepted Son V. TRAN and Cuong T. LE on
8 TT2 (sessions 938, 942, 964, 965, and 971). Son V. TRAN and Cuong T. LE agreed to
9 “split a corner” (meaning 9 ounces) of heroin. During an intercepted follow up call, Son
10 V. TRAN asked Cuong T. LE for a “rice cake” (meaning a kilogram of cocaine) because
11 Son V. TRAN is out (meaning is out of product to sell). Electronic surveillance at Son V.
12 TRAN’s residence 5724 South Bangor Street, Seattle (**Residence No. 1**) showed Cuong
13 T. LE arriving at Son V. TRAN’s residence, driving the tan Lexus ES bearing license
14 868-YMH (**Vehicle No. 4**). During an intercepted follow up call from Cuong T. LE to
15 Son V. TRAN. Cuong T. LE stated he gave “the stuff” (meaning the narcotics) to the
16 “little boy” at the house. Case agents believe Cuong T. LE provided the narcotics to an
17 unidentified teenager known as “Kyle” who lives at Son V. TRAN’s residence.

18 109. On March 21, 2015, agents intercepted Son V. TRAN and Brianna K.
19 CARLSON on TT2 (session 1031). CARLSON called Son V. TRAN and told him his
20 Mexican friend was at the house. Agents reviewed the electronic surveillance at Son V.
21 TRAN’s residence and observed Pedro Martinez Martinez’s vehicle arrive at **Residence**
22 **No. 1**. Based on previous investigative intelligence, agents believed Son V. TRAN
23 purchased an amount of narcotics from Pedro Martinez Martinez. Surveillance followed
24 Pedro Martinez Martinez as he left **Residence No. 1**. Approximately 45 miles later,
25 detectives had Pedro Martinez Martinez stopped. A narcotic detection K9 received a
26 positive response for odor of narcotics in Pedro Martinez Martinez’s vehicle. Detectives
27 seized the vehicle for a search warrant. During the service of the search warrant, agents
28 recovered \$32,950 in a hidden concealment trap in the vehicle.

110. On March 8, 2015, agents intercepted Son V. TRAN and CARLSON on TT1 (session 594). From watching electronic surveillance, agents knew Son V. TRAN was located at Billiard Hoang, 3220 South Hudson Street, Seattle. At the same time Son V. TRAN was conversing with CARLSON, agents observed Son V. TRAN talking on his phone to CARLSON. This corroborated Son V. TRAN was the user of TT1.

Tuan A. VU – DTO leader and narcotic trafficker and supplier

111. On March 3, 2015, agents intercepted Tuan A. VU and Daniel B. ALLEN on TT-3 (sessions 504 and 510). Daniel B. ALLEN told Tuan A. VU he needed a “quarter” ounce of an unknown narcotic (this is the smallest amount Daniel B. ALLEN ordered from Tuan A. VU and Cuong T. LE during interception). Daniel B. ALLEN and Tuan A. VU agreed to meet at the Columbia gas stations in 15-25 minutes. Minutes later, surveillance observed and photographed Tuan A. VU meeting with Daniel B. ALLEN at the Gull Gas Station, 4800 Beacon Avenue South, Seattle. Tuan A. VU was driving the gray 2005 Toyota Sienna bearing license AIV0209 (listed above as **Vehicle No. 10**). Daniel B. ALLEN was driving an Enterprise rental vehicle. Tuan A. VU exited his vehicle and went to Daniel B. ALLEN who was alone. Tuan A. VU and Daniel B. ALLEN conducted a hand-to-hand exchange that appeared to be a narcotic transaction. Tuan A. VU and Daniel B. ALLEN then drove from the scene.

112. On March 1, 2015, at approximately 4:09 p.m., agents intercepted Tuan A. VU and an unknown male on (206) 744-8391 on TT-2 (session 225). Tuan A. VU and the male continued a conversation regarding the male ordering narcotics from Tuan A. VU. At the same time, I observed electronic surveillance at Tuan A. VU’s residence, 5571 18th Avenue South, Seattle (**Residence No. 2**) and saw Tuan A. VU exit the residence front door and get into the driver’s seat of the tan 1997 Lexus ES bearing license 868-YMH (**Vehicle No. 4**). I observed Tuan A. VU sitting in his vehicle talking on the phone. This corroborated Tuan A. VU was the user of TT3.

113. Additionally, on several occasions I observed Tuan A. VU and Tam C. NGUYEN drive the silver 1997 Toyota Camry bearing license ARZ4557 (**Vehicle No. 5**)

1 to and from Tuan A. VU and Cuong T. LE's residence (**Residence No. 2**). For example,
 2 on March 21, 2015, in connection with Tam C. NGUYEN making narcotic deliveries for
 3 Cuong T. LE (based on intercepted calls while Cuong T. LE was in the hospital) I
 4 observed Tam C. NGUYEN drive **Vehicle No. 4 and Vehicle No. 5** from Tuan A. VU
 5 and Cuong T. LE's residence (**Residence No. 2**) and conduct narcotic transactions in
 6 **Vehicle No. 4 and Vehicle No. 5**. For example, agents intercepted calls between Cuong
 7 T. LE and a male known only as "Ali." Ali ordered an amount of narcotics from Cuong
 8 T. LE. Cuong T. LE and Yen T. VU directed Tam C. NGUYEN to deliver a narcotic
 9 package to "Ali". Surveillance observed Tam C. NGUYEN leave **Residence No. 2**
 10 driving **Vehicle No. 4** and meet with a male believed to be "Ali" and conduct an apparent
 11 narcotic exchange. During another example, agents intercepted calls between Cuong. T.
 12 LE and Tony V. NGUYEN on TT4 where Tony V. NGUYEN ordered an amount of
 13 narcotics. Cuong T. LE told Tony V. NGUYEN "Tam" would meet him at the "Viet
 14 Wah" lot and Tam would be driving the silver Toyota Camry (**Vehicle No. 5**).
 15 Surveillance observed Tam C. NGUYEN driving **Vehicle No. 5** arrive at the Viet Wah,
 16 6040 Martin Luther King Jr Way S, Seattle and meet with Tony V. NGUYEN who was
 17 driving **Vehicle No. 21**.

18 **Huy V. TRAN – Narcotic distributor**

19 114. On March 20, 2015, agents intercepted calls between Son V. TRAN and his
 20 brother, Huy V. TRAN on TT1 (sessions 1803, 1804, and 1808). Son V. TRAN and Huy
 21 V. TRAN discussed people who owed Son V. TRAN and the DTO money. Huy V.
 22 TRAN also discussed purchasing amounts of narcotics from Son V. TRAN.
 23 Approximately 50 minutes (at 9:30 p.m.) after their last call when Son V. TRAN told
 24 Huy V. TRAN, "it's here", I observed the electronic surveillance at Son V. TRAN's
 25 residence 5724 South Bangor Street, Seattle (**Residence No. 1**) and observed Huy V.
 26 TRAN's gray 2006 Mercedes E320 bearing license ATJ1438 (**Vehicle No. 6**) arrive at
 27 Son V. TRAN's residence. Court authorized GPS locates for Huy V. TRAN's cellular
 28 phone showed Huy V. TRAN at Son V. TRAN's residence at 9:38 p.m.

115. On March 24, 2015, agents intercepted Cuong T. LE and Huy V. TRAN on TT4 (sessions 1312, 1348, 1353, 1356, 1364, and 1372). Huy V. TRAN asked Cuong T. LE for "10 coffee" (meaning 10 ounces of heroin). Cuong T. LE agrees to call back. Cuong T. LE called Huy V. TRAN and stated he has only 1.5 eggs (meaning one and half ounces) and offered the drugs to Huy V. TRAN. Huy V. TRAN asked for a "big bag of MSG" (meaning methamphetamine). Cuong T. LE says he's getting a "corner" (meaning a quarter kilogram) and will give Huy V. TRAN "five pieces" (meaning five ounces) and will take 45 minutes to get it. Cuong T. LE and Huy V. TRAN discussed meeting at the "old place". Surveillance observed and photographed Huy TRAN arriving at A Chau Restaurant, 6902 Rainier Avenue South, Seattle, driving the gray 2006 Mercedes (Vehicle No. 6). Cuong T. LE arrived at A Chau later. Court authorized GPS location for Huy TRAN's cellular phone showed Huy TRAN at the A Chau Restaurant.

116. Based on GPS locates for Huy V. TRAN's cellular phone, electronic surveillance installed viewing Huy V. TRAN's residence, I believe Huy V. TRAN resides at 575 Graham Avenue Northeast, Renton (Residence No. 3). GPS locates for Huy V. TRAN's cellular phone consistently place his cellular phone at Residence No. 3 during sleeping hours i.e., 4:00 a.m. According to a law enforcement database, Cynthia B. DOA, Huy V. TRAN's daughter-in-law registered utilities to Residence No. 3 as of August 13, 2014. Surveillance has also observed Vehicle No. 6 and Son V. TRAN's vehicles (Vehicles No. 1, 2, and 3) parked at Residence No. 3).

Cuong T. LE – Narcotic supplier and distributor

117. On March 20, 2015, agents intercepted Cuong T. LE and Son V. TRAN on TT2 (session 979, 993). Son V. TRAN told Cuong T. LE he has "coffee" (meaning heroin) and "rice cake" (a kilogram of cocaine). Son V. TRAN stated he just got one "coffee" (heroin) from a third party and, "it's very good" (good quality narcotics), unlike the one from Cuong T. LE. Son V. TRAN says he just picked one up for "33" (meaning \$33,000). Son V. TRAN says he can split it with Cuong T. LE if he wants because he (Son V. TRAN) has a whole one. Cuong T. LE stated he wants, "one of each" and

1 suggested Cuong T. LE meet with Son V. TRAN in 25 minutes. Son V. TRAN told
2 Cuong T. LE "we" just woke up and agreed to talk later. Minutes later, based on
3 electronic surveillance observations at Cuong T. LE's residence, Cuong T. LE was
4 transported to the hospital for a minor health condition and they did not meet.

5 118. On March 24, 2015, agents intercepted Tam C. NGUYEN on Cuong T.
6 LE's phone TT4, talking to Yen T. VU (session 1291). Tam C. NGUYEN asked Yen T.
7 VU to relay a message to Cuong T. LE that Tam C. NGUYEN needs "2 hard balls"
8 adding that he (Tam C. NGUYEN) wants them separately, one of each kind (most likely
9 meaning, one ounce each of crack cocaine and heroin). Tam C. NGUYEN and Yen T.
10 VU talked about picking up "Casey", Tuan A. VU's daughter who Cuong T. LE and Yen
11 T. VU were taking care of while Tuan A. VU was in Vietnam. During session 1294,
12 agents intercepted Cuong T. LE and Tam C. NGUYEN discussing meeting at "Casey's"
13 school (Van Asselt Academy, Elementary School, Seattle). Surveillance observed Cuong
14 T. LE and Yen T. VU leave the residence at 5571 18th Avenue South, Seattle (**Residence**
15 **No. 2**) drive to Casey's school, pick up a juvenile female believed to be "Casey" and then
16 drive away. During session 1296, agents intercepted Tam C. NGUYEN and Cuong T.
17 LE and the two agreed to meet at a Vietnamese Restaurant. Minutes later, surveillance
18 observed and photographed Cuong T. LE, driving with Yen T. VU and the juvenile
19 female who arrived at the Viet Wah parking lot, a location where Cuong T. LE frequently
20 meets with narcotic customers. Yen T. VU and "Casey" walked to a nearby restaurant
21 and surveillance observed Cuong T. LE meeting with Tam C. NGUYEN and Tony V.
22 NGUYEN for apparent narcotic transactions. Tam C. NGUYEN was driving his green
23 1993 Toyota Camry bearing license AAT9509 (**Vehicle No. 9**). Minutes later,
24 surveillance observed Yen T. VU and the juvenile female come back to Cuong T. LE at
25 his vehicle.

26 119. On March 26, 2015, at approximately 4:21 p.m., surveillance observed and
27 photographed Cuong T. LE at Chase Bank, 7100 Martin Luther King Jr Way S, Seattle.
28 Yen VU was with Cuong T. LE in the tan Lexus (**Vehicle No. 4**).

120. Based on surveillance from August and September 2014 when Cuong T. LE traveled to 31234 8th Avenue South, Federal Way (**Residence No. 13**) before and after obtaining kilogram amounts of controlled substances, I believe Cuong T. LE uses this residence as a stash location. Additionally, Washington DOL show that Cuong T. LE lists **Residence No. 13** as his address. Additionally, on or about April 1, 2015, investigators observed the GPS locates on the court authorized GPS device placed on Cuong T. LE's tan Lexus (**Vehicle No. 4**) and noticed the GPS locates showed the vehicle at **Residence No. 13**. Surveillance personnel responded to the residence and observed Cuong T. LE exit the front door of **Residence No. 13**, get in his vehicle, and drive away.

Patrick WONG – Narcotic supplier and distributor

121. On March 19, 2015, agents intercepted Son V. TRAN and Patrick WONG on TT2 (sessions 941, 944, 949, 961, and 966). Through a series of intercepted phone calls, Son V. TRAN ordered “a corner” (meaning a quarter kilogram equivalent to 9 ounces) of heroin from Patrick WONG. Son V. TRAN and Patrick WONG agreed to meet at Seattle location. Surveillance observed and photographed Son V. TRAN meeting with Patrick WONG. Son V. TRAN got into Patrick WONG's front passenger seat and got out holding what appeared to be narcotics in black packaging in his right hand. Patrick WONG drove his blue 1998 Nissan Quest van bearing license AKL1020 (**Vehicle No. 7**). Son V. TRAN drove his white 2006 Lexus GS3 WA/ARZ5325 (**Vehicle No. 2**).

122. On or about April 3, 2015, surveillance arrived at Patrick WONG's and observed Patrick WONG standing outside of **Residence No. 4** and minutes later observed Patrick WONG go back into the residence. Additionally, surveillance personnel consistently observe Patrick WONG's blue van (**Vehicle No. 7**) parked in the driveway of **Residence 4**.

Phuong A. NGUYEN – Firearm and Narcotic possession

123. In January 2015, Tukwila Police Department, Tukwila, Washington detectives used a Cooperating Witness (CW) to make two separate controlled narcotic

1 purchases from Phuong A. NGUYEN. During both controlled narcotic purchases,
2 detectives searched the CW prior to and following the purchases for weapons, narcotics,
3 and money. No items were found prior to or following the controlled purchases.

4 124. On January 8, 2015, the CW provided information to detectives stating the
5 person known to the CW as "P", later identified as Phuong A. NGUYEN, used telephone
6 number 206-451-3075, and was selling large quantities of crack cocaine, crystal
7 methamphetamine, and heroin from the Extended Stay America Motel room 305, located
8 at 15451 53rd Ave South, Tukwila. The CW added that on multiple occasions he/she had
9 seen firearms inside room 305.

10 125. Detectives had the CW call Phuong A. NGUYEN at 206-451-3075 and
11 place an order for a quarter of an ounce, or two "8-balls," of methamphetamine. During
12 the call, Phuong A. NGUYEN agreed to sell the CW the narcotics. The CW was
13 provided \$180.00 to purchase the methamphetamine from NGUYEN.

14 126. During the first controlled narcotic purchase, the CW purchased 5.98 grams
15 of methamphetamine from Phuong A. NGUYEN in exchange for the \$180 while inside
16 Phuong A. NGUYEN's hotel room #305. The purchased narcotics tested positive for the
17 presence of amphetamines and methamphetamines.

18 127. On January 13, 2015, the CW told detectives Phuong A. NGUYEN was
19 still selling narcotics from the same hotel room, 305. Detectives had the CW call "P"
20 (Phuong A. NGUYEN) at 206-451-3075 and place an order for approximately \$60.00 in
21 crack cocaine, one "8-ball" of crystal methamphetamine for approximately \$130.00, and
22 two "teeners" for approximately \$200.00. Based on my knowledge and experience I
23 know that a "teener" is street terminology for half of an "8-ball" or one eighth of an
24 ounce. The CW was provided \$390.00 to purchase the narcotics from Phuong A.
25 NGUYEN.

26 128. During the second controlled narcotic purchase, the CW purchased .63
27 grams of crack cocaine, 3.53 grams of methamphetamine, and 2.5 grams of heroin from
28 NGUYEN in exchange for the \$390 while inside Phuong A. NGUYEN's hotel room

1 #305. The purchased narcotics tested positive for the presence of cocaine,
2 methamphetamines, and heroin respectively.

3 129. The CW told detectives that he/she observed "P" (Phuong A. NGUYEN) in
4 possession of a gun during the narcotic transaction. The CW believed the handgun was a
5 semi-automatic 9mm caliber pistol.

6 130. On January 14, 2015, Detective Cruz obtained a search warrant signed by
7 Superior Court Judge Helen Halpert for, the offender known as "P", "P"s cellular phone
8 206-451-3075, and Room 305 of the Extended Stay America located at 15451 53rd Ave
9 South, Tukwila.

10 131. On January 15, 2015, at approximately 3:00p.m., Tukwila Police officers
11 executed the search warrant and located three individuals inside including Phuong A.
12 NGUYEN who initially provided a false identification of Trung Quang Nguyen. Phuong
13 A. NGUYEN ultimately provided his true name. Also in the room were Bradley Allen
14 Hartz and Chastity Nicole Williams. During the search, Hartz was armed with a
15 concealed handgun, a .22 caliber 9-shot revolver. Phuong A. NGUYEN told Detective
16 Cruz his cellphone number was 206-451-3075. Detective Cruz located Phuong A.
17 NGUYEN's cellphone next to a laptop on a small desk located by the kitchen. Phuong
18 A. NGUYEN was arrested and read his *Miranda* rights. During the search of Room 305,
19 the Tukwila Police recovered the following items:

- 20 a. .357 magnum Taurus (loaded with live ammunition) revolver
- 21 bearing serial FS14228
- 22 b. .25 caliber Beretta semi-automatic handgun with magazine bearing
- 23 serial BU23138
- 24 c. 12 gauge Mossberg shotgun bearing serial U085182
- 25 d. Loose ammunition: 12 gauge, .357,
- 26 e. 36.44 grams of Crystal Methamphetamine
- 27 f. 5.50 grams of Heroin
- 28 g. .27 grams of Crack Cocaine

- h. Other Narcotics (Methadone, Alprazolam, Clonazepam)
- i. Cell Phone 206-451-3075
- j. Drug Paraphernalia
- k. Digital Scales
- l. \$2,557.00 in US Currency

132. At the Tukwila Police station, detectives processed the recovered narcotics and field tested the narcotics with positive results for methamphetamine, heroin, and cocaine respectively. After waiving his *Miranda* rights, Phuong A. NGUYEN admitted to Detective Lindstrom that he was selling narcotics from the hotel. Phuong A. NGUYEN told that he was selling narcotics for "LJ", known to be Phuong H. NGUYEN. Phuong A. NGUYEN stated "LJ" has access to larger amounts of narcotics. Phuong A. NGUYEN also stated the "stuff" detectives recovered from the motel room belonged to "LJ".

Son T. NGUYEN – Firearms supplier and narcotic distributor and Phuong A. NGUYEN – Firearm possession and narcotics customer

133. On March 3, 2015, at 2:04 p.m. agents intercepted calls between Son V. TRAN and Phuong A. NGUYEN on TT2. During the call, Phuong A. NGUYEN stated he was just in a physical altercation with unknown male and female. Based on intercepted calls, I believe the physical altercation was connected to Phuong A. NGUYEN confronting the person(s) he believed were cooperating with law enforcement which led to the January 2015 arrest by Tukwila Police Department. Phuong A. NGUYEN requested Son V. TRAN's assistance to further the altercation with the unknown male.

134. At 2:09 p.m., agents intercepted a call between Son V. TRAN and Son T. NGUYEN. During the call, Son V. TRAN asked Son T. NGUYEN if he had any "chicken" (I knew members of the DTO use chicken as a code word for a gun). Son T. NGUYEN stated he did and Son V. TRAN said he was coming over to pick it up. Son V. TRAN had follow up calls with Phuong A. NGUYEN, where Phuong A. NGUYEN

1 provided instructions on how to get to Phuong A. NGUYEN's house, 12235 Southeast
2 206th Street, Kent (**Residence No. 11**).

3 135. Surveillance then observed a known associate's vehicle at Son T.
4 NGUYEN residence, 11115 59th Avenue South, Seattle (**Residence No. 5**). Surveillance
5 then observed the associate, Son V. TRAN, and Son T. NGUYEN driving towards Kent
6 to Phuong A. NGUYEN's residence and eventually observed all four men at the Kent
7 residence together. Approximately 30 minutes later, the associate, Son V. TRAN, and
8 Son T. NGUYEN left Phuong A. NGUYEN's residence followed by surveillance. Case
9 agents determined the associate transported Son T. NGUYEN to his residence
10 (**Residence No. 5**) and then Son V. TRAN to his residence (**Residence No. 1**).

11 136. At approximately 4:10 p.m., surveillance detectives observed Phuong A.
12 NGUYEN leave his residence (**Residence No. 11**) in a vehicle. A SWAT team stopped
13 the vehicle and arrested Phuong A. NGUYEN for a felony arrest warrant and recovered a
14 loaded 9mm handgun from under the seat where Phuong A. NGUYEN was sitting.
15 Phuong A. NGUYEN was arrested and booked into jail for his warrants.

16 137. At 5:28 p.m., case agents intercepted a call between Son V. TRAN and
17 Kimberle S. ALOJASIN on TT2. During the call, Kimberle S. ALOJASIN stated that
18 she was in a second vehicle behind Phuong A. NGUYEN at the time of his arrest.
19 Kimberle S. ALOJASIN then told Son V. Tran that she was holding Phuong A.
20 NGUYEN's narcotics and she did not know what to do with the drugs. Son V. TRAN
21 stated the "stuff" (meaning drugs) should go to "Kim". I know Kim is a street name for
22 Son T. NGUYEN and also understood that Phuong A. NGUYEN was selling narcotics
23 for Son T. NGUYEN, which is why Son V. TRAN directed ALOJASIN to give the drugs
24 to Son T. NGUYEN.

25 138. At 5:34 p.m., case agents intercepted a call between Son V. TRAN and Son
26 T. NGUYEN during which Son V. TRAN told Son T. NGUYEN about Phuong A.
27 NGUYEN's arrest. Thirteen minutes later, Son T. NGUYEN called Son V. TRAN and
28

1 asked Son V. TRAN to “hold the stuff” (meaning the drugs from Phuong A. NGUYEN)
2 because Son T. NGUYEN didn’t want the stuff (drugs) “to be used up”.

3 139. At 6:36 p.m., Son V. TRAN called Son T. NGUYEN and told Son T.
4 NGUYEN to give “three blankets to BA” (meaning three grams of cocaine to Kimberle
5 S. ALOJASIN) and Son T. NGUYEN agreed. Son V. TRAN then called Kimberle S.
6 ALOJASIN and told her, “Hey, I tell Kim to give you 3 gram, okay?” and when
7 Kimberle S. ALOJASIN stated she didn’t hear Son V. TRAN, Son V. TRAN repeated the
8 same and Kimberle S. ALOJASIN said, “Okay, thank you”. Son V. TRAN, later in the
9 call reiterated, “I tell him to give you a ball” (I know a ball is approximately 3 grams).

10 Son T. NGUYEN narcotic transactions

11 140. On March 17, 2015, agents intercepted calls between Son V. TRAN and
12 Son T. NGUYEN on TT2 (sessions 836 and 838). Son T. NGUYEN called Son V.
13 TRAN and stated, “I need white. I need black” (meaning Son T. NGUYEN needed
14 cocaine and heroin). Son V. TRAN agreed to come to Son T. NGUYEN’s residence
15 (**Residence No. 5**). Surveillance followed, observed and photographed, Son V. TRAN
16 leave his residence, 5724 South Bangor Street, Seattle (**Residence No. 1**) driving the
17 white 2007 Cadillac Escalade bearing license APZ1179 (**Vehicle No. 1**) and drive
18 directly to Son T. NGUYEN’s residence (**Residence No. 5**) and park in the driveway
19 inside the fence line.

20 141. On March 19, 2015, agents intercepted Son V. TRAN and Son T.
21 NGUYEN on TT2 (session 955). Son T. NGUYEN told Son V. TRAN, “I need
22 everything” (believed to mean crack cocaine, heroin, and methamphetamine). Son V.
23 TRAN says, “I have everything” (meaning the same type of narcotics Son T. NGUYEN
24 ordered). Minutes later, electronic surveillance at Son T. NGUYEN’s residence
25 (**Residence No. 5**) showed Son V. TRAN arriving at the residence driving the silver 2000
26 Jaguar S bearing license AQC0425 (**Vehicle No. 3**).

27 142. On March 21, 2015, at approximately 10:13 p.m., Seattle PD uniformed
28 officers arrested Son T. NGUYEN in Seattle and recovered amounts of narcotics and US

1 currency. Seattle PD officers reported to me that they observed Son T. NGUYEN's
 2 vehicle, a white 1999 Ford Expedition bearing license ALD1402 (**Vehicle No. 8**), parked
 3 behind a 7-11 at 2009 Rainier Avenue South, Seattle. Based on a law enforcement
 4 database search, Son T. NGUYEN is the registered owner of **Vehicle No. 8**. Officers
 5 also learned Son T. NGUYEN had a Renton Police Department misdemeanor warrant for
 6 his arrest. Officers contacted Son T. NGUYEN at the driver's seat of **Vehicle No. 8**,
 7 confirmed his identify, and arrested Son T. NGUYEN without incident. Search incident
 8 to arrest of Son T. NGUYEN, officers recovered 59.2 grams of crack cocaine, 23.5 grams
 9 of methamphetamine, 1 gram of heroin, and \$2,481.75 from Son T. NGUYEN. All items
 10 of narcotics field-tested positive for the presence of cocaine, methamphetamine, and
 11 heroin respectively.

12 143. The white 1999 Ford Expedition bearing license ALD1402 (**Vehicle No. 8**)
 13 is registered to Son V. NGUYEN with an address of 11115 59th Avenue South, Seattle
 14 (**Residence No. 5**) as of March 13, 2015 per Washington DOL.

15 **Phuong A. NGUYEN narcotic transactions**

16 144. On March 22, 2015, agents intercepted Son V. TRAN and Phuong A.
 17 NGUYEN on TT2 (session 1060, 1063, and 1064). Son V. TRAN called Phuong A.
 18 NGUYEN and told him "Nine Fingers" had been caught (referring to Seattle PD officers
 19 arresting Son T. NGUYEN the previous evening). Son V. TRAN told Phuong A.
 20 NGUYEN to call him (Son V. TRAN) if Phuong A. NGUYEN needed anything. Phuong
 21 A. NGUYEN stated he only had money for "half powder" (meaning a half-ounce of
 22 cocaine). The two agreed to meet at a Renton location later. Intercepted follow up calls
 23 combined with GPS locates on TT2 indicate Son V. TRAN and Phuong A. NGUYEN
 24 met with to complete the narcotic transaction.

25 145. On March 23, 2015, agents intercepted Son V. TRAN and Phuong A.
 26 NGUYEN on TT2 (session 1144, 1145, 1146, and 1150). Son V. TRAN and Phuong A.
 27 NGUYEN had the following conversation:

28 Son V. TRAN: What you want me to bring Phuong?

1 Phuong A. NGUYEN: Give (me) half, half

2 Son V. TRAN: Half, half...okay, take the whole piece

3 Phuong A. NGUYEN: One soft and half black

4 Son V. TRAN: Okay, bye

5 Based on this intercepted call and my knowledge of the DTO, I believe Phuong A.
6 NGUYEN ordered one ounce of cocaine and a half ounce of heroin from Son V. TRAN.
7 Phuong A. NGUYEN and Son V. TRAN had a later intercepted call where Phuong A.
8 NGUYEN directed Son V. TRAN to the Value Inn he was staying at 22246 Pacific
9 Highway South, Des Moines. GPS locates for TT2 at 9:40 p.m., approximately 50
10 minutes after intercepted calls directing Son V. TRAN to the hotel place Son V. TRAN in
11 the vicinity of the Value Inn.

12 146. On April 6, 2015, King County Detective T. Calabrese reported to me that
13 he observed Phuong A. NGUYEN at his residence at 12235 Southeast 206th Street, Kent
14 (**Residence No. 11**) during surveillance he was conducting on Phuong A. NGUYEN.

15 **Tam C. NGUYEN – Narcotic distributor**

16 147. On March 24, 2015, agents intercepted Cuong T. LE and Tam C.
17 NGUYEN on TT4 (sessions 1313, 1317, 1318, 1320, 1324, 1332, 1341, and 1347).
18 Cuong T. LE stated he wanted to meet Tam C. NGUYEN after they finish business to
19 “wrap up that business.” Cuong T. LE stated, “The lady is parked over there so check out
20 the price of coffee” and Tam C. NGUYEN agreed. Three minutes later, Tam C.
21 NGUYEN complained that they (unknown individual(s)) said the cost of “coffee is 31”
22 (meaning \$31,000 for a kilogram of heroin). Tam C. NGUYEN stated at \$31,000 they
23 cannot make any profit. Tam C. NGUYEN stated they (unknown) stated the “rice cake is
24 really good” (meaning a good quality kilogram of cocaine). Tam C. NGUYEN talked
25 about obtaining “rice cakes” from a different source of supply for \$34,000 per kilogram
26 of cocaine. Tam C. NGUYEN added it would be hard to make a profit at that price.
27 Three minutes later, Cuong T. LE ordered “one rice cake and one coffee” (meaning one
28 kilogram each of cocaine and heroin) from Tam C. NGUYEN. Five minutes later, Tam

1 C. NGUYEN told Cuong T. LE, "the rice cakes are available now but you've gotta wait
 2 for coffee until the evening". Cuong T. LE instructed Tam C. NGUYEN to wait until the
 3 evening to make less trips and Tam C. NGUYEN agreed. Approximately 25 minutes
 4 later, Tam C. NGUYEN told Cuong T. LE the "rice cakes are available now but the
 5 coffee will have to wait until tomorrow to be certain or maybe tonight." Cuong T. LE
 6 stated, "Go by the house, sign the check, and go the market and do some buying" and the
 7 two agreed. I believe Cuong T. LE used coded talk in telling Tam C. NGUYEN to go to
 8 the house (**Residence No. 2**) and retrieve money and go purchase the kilogram amounts
 9 of narcotics. Approximately four minutes later, Tam C. NGUYEN asked Cuong T. LE to
 10 go home and write a check for Tam C. NGUYEN (meaning provide money to Tam C
 11 NGUYEN to purchase additional narcotics). Approximately 15 minutes later, at 5:06
 12 p.m., NGUYEN stated he is on his way. Cuong T. LE stated he was 30 seconds away.
 13 At 5:07 p.m., I observed electronic surveillance at Cuong T. LE's residence (**Residence**
 14 **No. 2**), and observed Cuong T. LE, Yen VU and the juvenile female return to the
 15 residence in Cuong T. LE's Lexus (**Vehicle No. 4**). At 5:09 p.m., I observed Tam C.
 16 NGUYEN arrive at Cuong T. LE's residence driving the green 1993 Toyota Camry
 17 bearing license AAT9509 (**Vehicle No. 9**). One minute later, Tam C. NGUYEN left the
 18 residence carrying a white shopping bag, driving the green Camry. Surveillance followed
 19 Tam C. NGUYEN to Safeway, 3900 South Othello Street, Seattle, a frequent location for
 20 DTO members to conduct narcotic transactions. Tam C. NGUYEN met with the
 21 unknown male driver of a 2014 Hyundai bearing California license 7DKH826. Tam C.
 22 NGUYEN handed the Hyundai driver the white shopping bag. Surveillance attempted to
 23 follow the Hyundai but lost the vehicle in traffic. At approximately 5:32 p.m., I observed
 24 Tam C. NGUYEN return to Cuong T. LE's residence (**Residence No. 2**).

25 148. On March 26, 2015, agents intercepted Cuong T. LE and Tam C.
 26 NGUYEN on TT4 (session 1654). During the call, Tam C. NGUYEN asks Cuong T. LE
 27 for "one hard and one soft" (meaning one ounce each of crack cocaine and powder
 28 cocaine) and they agreed to meet at the school. During the intercepted call on session

1 1656, NGUYEN and Cuong T. LE agreed to meet at "Casey's" school. Surveillance
2 observed and photographed NGUYEN arrive in the green Camry (**Vehicle No. 9**).
3 Cuong T. LE arrived in the tan Lexus (**Vehicle No. 4**) and they met in the school parking
4 lot where other parents were picking up children. Tam C. NGUYEN met at Cuong T.
5 LE's vehicle and obtained narcotics. Surveillance noted kids were around as school was
6 letting out for the day. Surveillance captured several photographs of kids around the
7 narcotic transaction. During Session 1658, Tam C. NGUYEN tells Cuong T. LE they are
8 short on "coffee" (meaning heroin), Cuong T. LE says they'll get more. Both parties
9 went to Cuong T. LE's residence (**Residence No. 2**).

10 149. On March 27, 2015, agents intercepted Cuong T. LE and Tam C.
11 NGUYEN on TT4 (sessions 1835, 1836, 1837, 1838, and 1839). Cuong T. LE and Tam
12 C. NGUYEN discussed seeing surveillance while in the Viet Wah parking lot in Seattle.
13 Surveillance took several photographs of Tam C. NGUYEN and Cuong T. LE in the
14 parking lot. Cuong T. LE was driving his tan Lexus (**Vehicle No. 4**) and NGUYEN was
15 driving his green Camry (**Vehicle No. 9**). Per Washington DOL, **Vehicle No. 9** is
16 registered to Tam C. NGUYEN to a Yakima, Washington address.

17 150. Court authorized GPs locates for Tam C. NGUYEN's cellular phone
18 frequently place Tam C. NGUYEN in the vicinity of 12023 46th Avenue South, Tukwila
19 (**Residence No. 6**) particularly during sleeping hours such as 4:00 a.m.

20 151. On March 31, 2015, upon Tuan A. VU's return from Vietnam, investigators
21 observed Tuan A. VU exit the airplane at SeaTac Airport through the airport and then get
22 picked up by his girlfriend Kim DO and Tam C. NGUYEN while driving the gray 2005
23 Toyota Sienna van bearing license AIV0209 (**Vehicle No. 10**). Investigators followed
24 Tuan A. VU, DO and Tam C. NGUYEN back to Kim DO and Tam C. NGUYEN's
25 known residence at 12023 46th Avenue South, Tukwila (**Residence No. 6**). Per
26 Washington DOL, **Vehicle No. 10** is registered to Kim L. DO, Tuan A. VU's girlfriend,
27 at 12033 56th Place South, Seattle. Per Accurint, a law enforcement database, Kim L. DO
28 is associated with **Residence No. 6** since March 2015.

Brieanna K. CARLSON – narcotics distributor for Son V. TRAN

152. On February 28, 2015, agents intercepted calls between Son V. TRAN, Donald K. JORDAN, and Brieanna K. CARLSON on TT1 (sessions 8, 22, 31, 33, 35, and 36). During these calls Donald K. JORDAN called Son V. TRAN to order narcotics and Son V. TRAN communicates with Brieanna K. CARLSON to have her distribute the narcotics to Donald K. JORDAN. Brieanna K. CARLSON distributes the narcotics to Donald K. JORDAN, but due to the poor quality, later retrieves the narcotics from Donald K. JORDAN and then returns his money to him.

153. Son V. TRAN asked what Donald K. JORDAN needed, and Donald K. JORDAN stated “one soft and one black” (meaning one ounce each of cocaine and heroin). Son V. TRAN and Donald K. JORDAN agreed and then Donald K. JORDAN confirmed with Son V. TRAN that he owed “52” (meaning \$5,200 US currency). Son V. TRAN replied in the affirmative and instructed Donald K. JORDAN to come on down. Donald K. JORDAN asked about the quality of the cocaine and Son V. TRAN stated the quality was good and the two agreed to meet. A second call was intercepted where Donald K. JORDAN and Son V. TRAN discussed the location to meet. Approximately four minutes later, agents intercepted a call between Son V. TRAN and Brieanna K. CARLSON. Son V. TRAN provided instructions to CARLSON about the transaction with Donald K. JORDAN. Son V. TRAN stated, “Make sure he’s going to take the night. Make sure he can give you, umm, the night the money for the night, okay? Total is supposed to be twenty, two-fifty okay? I knew Son V. TRAN was telling Brieanna K. CARLSON to get \$2,250 from Donald K. JORDAN for the narcotics, likely heroin. Brieanna K. CARLSON stated, “Yeah, he gave me umm, twenty-three”. I knew this meant Brieanna K. CARLSON just received \$2,350 from Donald K. JORDAN. Within a few minutes of meeting Brieanna K. CARLSON, Donald K. JORDAN called Son V. TRAN and had the following conversation:

Son V. TRAN: Hello, hello

1 Donald K. JORDAN: Hey, you can't have her come pick this one up man, I don't
2 want this one man, I can't do nothing with this one right here. I'm gonna lose too
3 much on this.

4 Son V. TRAN: Which one

5 Donald K. JORDAN: On the night, the nighttime

6 Son V. TRAN: No, I'm telling you trust me, it just look like that, it's not the same
7 one

8 Donald K. JORDAN: It's too small for me, when I break it down I'm gonna lose
9 on it, that's what I'm saying. I'm gonna have to wait until the other shit come in.

10 Son V. TRAN: Oh, okay, okay. I'm telling it's better than [unintelligible]. Why
11 don't you just have somebody test it out? I guarantee you, I'll come pick it up up
12 north from you if your people don't like it. Let them try it for half a gram, I
13 promise you, this is the only one I have right now. I guarantee it's the good one. If
14 it don't I'll have my boy come pick it up and give your money back, just try it
15 believe me man, it's not the same one.

16 Donald K. JORDAN: This is what I'm saying...

17 Son V. TRAN: Hello?

18 Donald K. JORDAN: I'm gonna lose on it when I break it down, that's what I'm
19 saying because it's so sticky, it's so sticky.

20 Son V. TRAN: It's not sticky, when when you open it it's going to be solid, trust
21 me. Ok just stay there, I'll tell her to come pick it up. [unintelligible], stay right
22 there.

23 Donald K. JORDAN: Alright.

24 Son V. TRAN: Bye

25 154. Agents then intercepted the following call between Son V. TRAN and
26 Brianna K. CARLSON:

27

28

1 Son V. TRAN: Hey, ah come back to the one and ah he want to return the night.
2 Give him back 1050 for okay? 10, \$1050.00 back, then he give you the night,
3 okay?

4 Brianna K. CARLSON: okay

5 Son V. TRAN: okay, bye.

6 155. Agents then intercepted the following call between Son V. TRAN and
7 JORDAN:

8 Donald K. JORDAN: Hello?

9 Son V. TRAN: Hey, umm come back at six cause I got the gun powder (known to
10 be heroin) for you, okay?

11 Donald K. JORDAN: Is it going to be the good one though? It ain't gotta be, I just
12 need some good shit.

13 Son V. TRAN: It, it is the good shit. The one I send is the really good shit
14 (stuttering), but I don't know, but I got got another another kind, I'm gonna buy but
15 this one is good though. I'm gonna hit you up, okay?

16 Donald K. JORDAN: Alright, cool.

17 Son V. TRAN: Alright buy.

18 Based on previous calls between TRAN and Donald K. JORDAN I knew Donald
19 K. JORDAN had previously complained about the quality of heroin TRAN provided.
20 During this call, TRAN called Donald K. JORDAN to inform him he (TRAN) had good
21 quality heroin to sell.

22 156. Agents observed on electronic surveillance Brianna K. CARLSON leave
23 and return to Son V. TRAN and her residence, 5724 South Bangor Street, Seattle
24 (**Residence No. 1**) driving the white Cadillac Escalade bearing license APZ1179
25 (**Vehicle No. 1**) prior to and following the transaction.

26 157. On March 18, 2015 agents intercepted Son V. TRAN and Steven J.
27 CONNELL on TT2 (sessions 911, 914, 915, 924, and 927). Steven J. CONNELL and
28 Son V. TRAN had the following conversation:

1 Steven J. CONNELL: Hey Son, whats up, hey man, I need you to bring.

2 Son V. TRAN: (Interrupting) I bring it to you but what you need?

3 Steven J. CONNELL: I need a whole White and, uh, half Black, but I only have,
4 hey I only have 1450 right now though dude.

5 Son V. TRAN: How much you owe me already?

6 Steven J. CONNELL: I don't owe you nothing right now. I paid you last time.

7 Son V. TRAN: Didn't you owe me last time a hundred?

8 Steven J. CONNELL: Yeah, owed you a hundred, and paid you that.

9 Son V. TRAN: You owed me a hundred last time, now uh.

10 Steven J. CONNELL: Yeah, yeah.

11 Son V. TRAN: Ok, I do it for you ok, and I just text you what you owe me ok?

12 Steven J. CONNELL: Ok thanks Tran I appreciate that, thank you very much

13 Son V. TRAN: Hey, hey

14 Steven J. CONNELL: Yeah, yeah, yeah

15 Son V. TRAN: The Daytime you got the eleven five, ok, its not mine, I got it from
16 somebody else, but its good.

17 Steven J. CONNELL: Is it good, is it real good?

18 Son V. TRAN: Its its its good, its good.

19 Steven J. CONNELL: Its cause uh I mean Daytime, there's a lot of competition
20 right now, a lot of people are, there a lot of competition right now man so, you
21 know.

22 Son V. TRAN: Yeah.

23 Steven J. CONNELL: You know what I mean?

24 Son V. TRAN: I know, but it's not much going on right now.

25 Steven J. CONNELL: I know, I know I know I know I know, like you say I am
26 pretty low though, so you know. I can save one person though so you know,
27 alright catchup and I owe you, thank you man, I appreciate it.

28 Son V. TRAN: Ok bye.

1 Based on my training and experience and previous calls between Son V. TRAN
 2 and Steven J. CONNELL I determined Steven J. CONNELL ordered one ounce of
 3 cocaine ("white" or "daytime") and a half-ounce of heroin ("black") but did not have
 4 enough money to pay the full amount. Son v. TRAN told Steven J. CONNELL the
 5 cocaine costs \$1,150 (for the ounce) and stated he obtained it from someone else but the
 6 quality was good. The two agreed Steven J. CONNELL would owe Son V. TRAN for
 7 the money Steven J. CONNELL was short for this transaction.

8 158. At approximately 7:24 p.m., I observed the electronic surveillance at Son
 9 V. TRAN's residence (**Residence No.1**) and observed Son V. TRAN leave driving the
 10 white Cadillac Escalade (**Vehicle No. 1**) and Brianna K. CARLSON leave driving the
 11 silver Jaguar (**Vehicle No. 3**)

12 159. Case agents then intercepted the following call between Son V. TRAN and
 13 Brianna K. CARLSON where Brianna K. CARLSON told Son V. TRAN, "Will you
 14 tell him I'm outside." Son V. TRAN calls Steven J. CONNELL and states his wife is
 15 there. Steven J. CONNELL states he'll go outside.

16 **Yen T. VU – Narcotics distributor working at stash house for Cuong LE**

17 160. On March 21, 2015, agents intercepted calls between Cuong T. LE, Yen T.
 18 VU and Tam C. NGUYEN on TT4 (sessions 340 and 341). Agents noted Cuong T. LE
 19 was not at his residence (**Residence No. 2**) because he was at the hospital after having a
 20 minor health situation the previous day. At approximately 2:26 p.m., I observed
 21 electronic surveillance at Cuong T. LE's residence (**Residence No. 2**) and observed Tam
 22 NGUYEN arriving at the residence. Cuong T. LE then called Yen T. VU. Yen T. VU
 23 was intercepted talking to Tam NGUYEN, who was at Cuong T. LE's residence with
 24 Yen T. VU. Yen T. VU told Cuong T. LE that he (Tam NGUYEN) was at the house.
 25 Yen T. VU instructed Tam NGUYEN, "This is Ali at Barbeque place on Beacon Hill and
 26 this one is on this street." Cuong T. LE stated, "24th street, at the corner of 24th and
 27 [somewhat inaudible, but believed to be Eddy St]." Yen T. VU told Cuong T. LE she
 28 wrote the words and numbers down for him (Tam C. NGUYEN) to see. Cuong T. LE

1 urged Tam C. Nguyen to leave right away then come back to get the stuff for the guy
2 "Tan" and Tuan T. VU later. Yen T. VU was intercepted in the background telling Tam
3 C. Nguyen, "This is Ali's and this is the 24th street". Agents intercepted additional
4 conversation between Cuong T. LE, Yen T. VU and Tam C. NGUYEN conversing about
5 specific amounts of narcotics and where the narcotics are be delivered to.

6 161. On March 22, 2015, agents intercepted Cuong T. LE and Yen T. VU on
7 TT4 (session 897). Cuong T. LE asked Yen T. VU to "have 4 MSG ready" (meaning to
8 package four ounces of methamphetamine and have them ready for Cuong T. LE).
9 Cuong T. LE stated he would be back in 5 minutes to pick it up. Yen T. VU asked, "Will
10 you come in". Cuong T. LE said he would, and told Yen T. VU to wait by the window. I
11 observed the electronic surveillance at Cuong T. LE's residence (**Residence No. 2**) and
12 observed Cuong T. LE arrive at his residence in his Lexus (**Vehicle No. 4**) at 7:31 p.m.
13 Approximately three minutes later, Cuong T. LE walked out of the residence carrying a
14 white plastic bag to the Lexus and drove away.

15 162. On March 24, 2015, agents intercepted Tam NGUYEN on Cuong T. LE's
16 phone TT4, talking to Yen T. VU (session 1291). This call and the subsequent events are
17 discussed above in paragraph 118.

18 **Duy P. NGUYEN – Firearm and narcotics customer**

19 163. As also described above, on July 14, 2014, case agents received
20 information that at least one TRAN and VU DTO member was in "The Jungle" firing a
21 firearm. Detective Olsen and I arrived in the area and observed Duy P. NGUYEN and
22 another associate exiting The Jungle and stopped Duy P. NGUYEN and his associate.
23 Detective Olsen and I arrived in the 10th Avenue South and South Jackson Street area and
24 observed DTO associated vehicle a purple 2006 Toyota Scion bearing license AMF1440.
25 Detective Olsen and I observed two males both with backpacks walking to and getting in
26 the Scion. We stopped the two individuals before they drove away. The driver was
27 identified as Huy T. PHAN aka "TO", and the passenger was identified as Duy P.

28 NGUYEN aka "Mike." I immediately recognized Duy P. NGUYEN as a person directly

1 connected with the shooting suspect. I interviewed Duy P. NGUYEN and ultimately
 2 obtained verbal consent to search the vehicle and Duy P. NGUYEN's backpack. I
 3 opened the main zipper portion and moved a couple clothing items around and observed a
 4 black colored Glock handgun sitting in the bag. I then handcuffed Duy P. NGUYEN and
 5 confirmed he still wanted to provide consent to search the bag and he agreed. In the
 6 backpack, I ultimately discovered the following items:

- 7 a. Glock Model 19 9mm handgun bearing serial number GSE604
- 8 loaded with 14 live rounds
- 9 b. 46 grams of crack cocaine (net weight without packaging)
- 10 c. 20.1 grams heroin (net weight with some packaging)
- 11 d. 5.3 grams methamphetamine (net weight without packaging)
- 12 e. \$2,492 US currency
- 13 f. Black digital scale

14 164. Duy P. NGUYEN provided a post Miranda statement that Tuan H. TRAN
 15 had provided the handgun and narcotics to Duy P. NGUYEN. Additionally, following
 16 Tuan H. TRAN's arrest in May 2014, Tuan H. TRAN's stated he worked as a narcotic
 17 and firearm distributor for Son V. TRAN.

18 **Vinh Q. NGUYEN – Narcotics customer**

19 165. On March 10, 2015, agents intercepted Son V. TRAN and Vinh Q.
 20 NGUYEN on TT1 (sessions 694, 697, 706, and 709). Vinh Q. NGUYEN ordered one
 21 ounce of narcotics (believed to be cocaine) from Son V. TRAN. Vinh Q. NGUYEN and
 22 Son V. TRAN agreed to meet at a Seattle location. Surveillance observed and
 23 photographed Vinh Q. NGUYEN and Son V. TRAN meet. Vinh Q. NGUYEN got into
 24 Son V. TRAN's vehicle (**Vehicle No. 1**) to conduct the transaction. Vinh Q. NGUYEN
 25 drove his silver 2006 Honda Civic bearing license ANC2840 (**Vehicle No. 15**). Son V.
 26 TRAN drove the white Cadillac Escalade (**Vehicle No. 1**).

27 166. On March 20, 2015, agents intercepted Son V. TRAN and Vinh Q.
 28 NGUYEN on TT1 (sessions 1829, 1832, and 1835). Vinh Q. NGUYEN told Son V.

1 TRAN he needed “three” but then told Son V. TRAN he needs “four” (believed to be
2 four ounces of cocaine). Vinh Q. NGUYEN and Son V. TRAN agree to meet at a
3 location in Seattle. Surveillance observed and photographed Vinh Q. NGUYEN and Son
4 V. TRAN meeting in the apartment parking lot at 12826 60th Lane South, Seattle. Vinh
5 Q. NGUYEN drove his silver Honda Civic (**Vehicle No. 15**) and Son V. TRAN drove his
6 silver Jaguar (**Vehicle No. 3**). Surveillance then followed Vinh Q. NGUYEN to a
7 residence at 12005 76th Avenue South, Seattle (**Residence No 10**).

8 167. Additionally, court authorized GPS location data on Vinh Q. NGUYEN’s
9 cellular phone place Vinh Q. NGUYEN in the vicinity of **Residence No. 10** during
10 typical sleeping hours such as 4:00 a.m.

11 168. On April 8, 2015, I directed uniformed Seattle Police officers to **Residence**
12 **No. 10** to ascertain if Vinh Q. NGUYEN lived at the residence. The officers confirmed
13 **Residence No. 10** is the main residence; however, there is a subdivided and connected
14 residence of 7569 South 120th Street. Officers contacted residents at both doors and
15 determined the residence is occupied by the same family at both locations in the same
16 residence. I then examined the legal description listed with King County and determined
17 12005 76th Avenue S is the legal address and “7569 South 120th Street” is not listed as
18 part of the property. Based on several factors including the surveillance personnel
19 following Vinh. Q. NGUYEN to **Residence No. 10** on March 20, 2015 after purchasing
20 narcotics from Son V. TRAN; electronic surveillance installed on April 8, 2015 viewing
21 the front of **Residence No. 10** and observing Vinh Q. NGUYEN consistently coming to
22 and from **Residence No. 10**; and Vinh Q. NGUYEN’s vehicle (**Vehicle No. 15**)
23 consistently parked in the same spot in front of **Residence No. 10**, I believe there is
24 probable cause to believe Vinh Q. NGUYEN occupies **Residence No. 10**.⁴

25
26
27 ⁴ As a conservative approach, I will direct an arrest team to wait for Vinh Q. NGUYEN to leave **Residence**
28 **No. 10** in **Vehicle No. 15** and to stop and arrest NGUYEN and then interview him. If officers develop additional
information such as an admission from NGUYEN he resides at **Residence No. 10**, officers then may serve the
search warrant at **Residence No. 10**. If NGUYEN refuses to speak with officers, officers will be directed to make

Giang T. NGO – Narcotics customer

169. On March 18, 2015, agents intercepted Son V. TRAN and Giang T. NGO on TT1 (sessions 1595, 1605, and 1612). Giang T. NGO ordered an unknown amount of crack cocaine from Son V. TRAN (Giang T. NGO used code words when ordering the crack cocaine from Son V. TRAN). Son V. TRAN directed Giang T. NGO to his house. Electronic surveillance at Son V. TRAN's residence, 5724 South Bangor Street, Seattle (**Residence No. 1**) showed Giang T. NGO arrive at Son V. TRAN's residence driving a blue 1999 Ford Taurus Station Wagon bearing license AHN7422 (**Vehicle No. 16**). NGO stayed at Son V. TRAN's residence approximately five minutes and then departed alone. Surveillance personnel verified Giang T. NGO was the vehicle driver and sole occupant.

170. On March 20, 2015, agents intercepted Son V. TRAN and Giang T. NGO on TT1 (sessions 1820, 1822, 1823, and 1826). Giang T. NGO and Son V. TRAN discussed NGO arranging money payment to Son V. TRAN. Electronic surveillance at Son V. TRAN's residence (**Residence No. 1**) showed Giang T. NGO arrive in the blue Ford Taurus station wagon (**Vehicle No 16**). An intercepted follow up call between Son V. TRAN and Giang T. NGO confirmed that Giang T. NGO paid Son V. TRAN \$1,300.

171. On or about April 4, 2015, Giang T. NGO had conversation with Seattle Police Detective Matt Pasquan. During that conversation, Giang T. NGO told Detective Pasquan he lived at 643 Southwest 122nd Street, Burien (**Residence No. 12**). Additionally, Clear, a law enforcement database, indicated Giang T. NGO listed **Residence No. 12** as his address when he established a utility for the residence on or about November 15, 2014. Additionally, court authorized GPS locates on NGO's cellular phone place Giang T. NGO in the vicinity of **Residence No. 12** during typical sleeping hours like at approximately 4:00 a.m. Additionally, on April 7, 2015, at

contact of the occupants of **Residence No. 10** and determine if NGUYEN resides at the residence. If so, officers will conduct a search of **Residence No. 10**.

AFFIDAVIT OF TFO BRANDON JAMES - 57
IN SUPPORT OF SEARCH WARRANT
CR15-120 JCC

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 approximately 6:35 a.m., Detective Olsen observed Giang T. NGO exit **Residence No.**
 2 **12** get into the blue Ford Taurus (**Vehicle No. 16**) and drive from the residence.

3 **Phuong H. NGUYEN – Narcotics customer**

4 172. On March 18, 2015, agents intercepted Son V. TRAN and Phuong H.
 5 NGUYEN on TT1 (session 1583, 1586; TT-2, session 882, 883, and 885). Phuong H.
 6 NGUYEN ordered one ounce of cocaine and half-ounce crack cocaine using coded
 7 terminology known to case agents. Phuong H. NGUYEN and Son V. TRAN agreed to
 8 meet at a Renton parking lot location. Surveillance observed and photographed Phuong
 9 H. NGUYEN meet with Son V. TRAN. During the meet, Phuong H. NGUYEN got into
 10 Son V. TRAN's vehicle. Son V. TRAN drove the white Cadillac Escalade (**Vehicle No.**
 11 **1**). Phuong H. NGUYEN drove his silver 2000 Honda CRV bearing license ALD8415
 12 (**Vehicle No. 20**).

13 173. On March 20, 2015, agents intercepted Son V. TRAN and Phuong H.
 14 NGUYEN on TT1 (sessions 1797 and 1800). During the call, Phuong H. NGUYEN told
 15 Son V. TRAN he wanted "soft" (meaning cocaine) from Son V. TRAN. Son V. TRAN
 16 offered "black" (meaning heroin) for Phuong H. NGUYEN to look at. Son V. TRAN and
 17 Phuong H. NGUYEN discussed prices for the narcotics. Phuong H. NGUYEN ordered
 18 "20 pieces" (meaning 20 ounces) from Son V. TRAN and they agreed to meet at a
 19 Renton parking lot. Surveillance observed and photographed Son V. TRAN meeting
 20 with Phuong H. NGUYEN. Son V. TRAN got into Phuong H. NGUYEN vehicle. Son
 21 V. TRAN drove the white Lexus (**Vehicle No. 2**). Phuong H. NGUYEN drove his silver
 22 Honda CRV (**Vehicle No. 20**).

23 **Kenneth W. THOMAS – Narcotics customer**

24 174. On March 5, 2015, agents intercepted Son V. TRAN and Kenneth W.
 25 THOMAS on TT2 (sessions 264, 272, 274, and 276). Kenneth W. THOMAS ordered
 26 one and half ounces of "nighttime" (meaning heroin) and Son V. TRAN stated the cost
 27 would be \$2,075. Kenneth W. THOMAS then ordered additional cocaine and heroin
 28 using coded known coded words. Kenneth W. THOMAS and Son V. TRAN agreed to

1 meet at a Seattle location. Surveillance observed and photographed Kenneth W.
 2 THOMAS arriving at the location driving his burgundy 1992 Ford Pickup bearing license
 3 B72126G (**Vehicle No.11**). Son V. TRAN drove the white Cadillac Escalade (**Vehicle**
 4 **No. 1**). Kenneth W. THOMAS got into Son V. TRAN's vehicle to conduct the
 5 transaction.

6 175. On March 19, 2015, agents intercepted Son V. TRAN and Kenneth W.
 7 THOMAS on TT2 (sessions 1685, 1688, 1698, 1703, 1729, 1731, 1752, 1761, and 1763).
 8 Kenneth W. THOMAS stated he wanted, "everything". Son V. TRAN stated he has
 9 "everything" (believed to be cocaine, heroin and methamphetamine based on other calls).
 10 Son V. TRAN and Kenneth W. THOMAS agreed to meet at a SeaTac parking lot
 11 location. Surveillance observed and photographed Kenneth W. THOMAS's silver 1996
 12 Mitsubishi Eclipse bearing license AQA6399 (**Vehicle No. 12**) at the Kenneth W.
 13 THOMAS' residence, 4700 South 172nd Place, SeaTac (**Residence No. 7**) prior to the
 14 transaction. Surveillance observed and photographed Kenneth W. THOMAS exit
 15 **Residence No. 7**, drive the silver Mitsubishi (**Vehicle No. 12**), and meet with Son V.
 16 TRAN at the SeaTac location. Kenneth W. THOMAS met with Son V. TRAN at Son V.
 17 TRAN's vehicle, the silver Jaguar (**Vehicle No. 3**). Agents intercepted a call between
 18 Son V. TRAN and Brianna CARLSON on TT1 (session 1763) where agents overheard
 19 Son V. TRAN negotiating the narcotic transaction with Kenneth W. THOMAS.

20 176. According to Clear and Accurant, law enforcement databases and
 21 Washington DOL Kenneth W. THOMAS lists 4700 South 172nd Place, SeaTac
 22 (**Residence No. 7**) as his residence. Additionally, investigators consistently observe
 23 **Vehicle No. 11** and **Vehicle No. 12** (Kenneth W. THOMAS's vehicles) parked at
 24 Kenneth W. THOMAS's residence (**Residence No. 7**). Per Washington DOL, **Vehicle**
 25 **No. 11** is registered to Kenneth W. THOMAS at **Residence No. 7** as of July 1, 2014. Per
 26 Washington DOL, **Vehicle No. 12** is registered to Christopher Green, 2724 Meridian Ave
 27 E, Edgewood. During the interception on or about March 22, 2015, Kenneth W.

28 THOMAS told Son V. TRAN that the garage at this residence caught on fire destroying

1 another vehicle Kenneth W. THOMAS owned. Surveillance personnel responded to
2 **Residence No. 7** and observed the exterior garage had apparent fire damage.
3 Additionally, Clear law enforcement database indicated Kenneth W. THOMAS listed
4 **Residence No. 12** as his address when he established a utility for the residence on or
5 about September 2, 2014.

6 **Donald K. JORDAN – Narcotics customer**

7 177. On March 16, 2015 agents intercepted Son V. TRAN and Donald K.
8 JORDAN on TT1 (sessions 1238, 1242, 1257, 1264, and 1265). Donald K. JORDAN
9 ordered two ounces of narcotics (believed to be cocaine based on other intercepted calls)
10 from Son V. TRAN and the two arranged to meet at a Seattle parking lot location.
11 Surveillance observed and photographed Donald K. JORDAN and Son V. TRAN
12 meeting where Donald K. JORDAN got into Son V. TRAN's white Lexus (**Vehicle No.**
13 **2**). JORDAN drove his white 1999 Mercury Mountaineer bearing license ATG2524
14 (**Vehicle No. 13**).

15 178. On March 26, 2015 agents intercepted Son V. TRAN and Donald K.
16 JORDAN on TT1 (sessions 2453 and 2464). Donald K. JORDAN ordered "two" from
17 Son V. TRAN for \$1,200 each (believed to be cocaine). Surveillance observed Son V.
18 TRAN driving his white Lexus (**Vehicle No. 2**) at vehicle dealership in Renton. Donald
19 K. JORDAN drove his silver 2004 Kia bearing license Temp#1666027A (**Vehicle No.**
20 **14**). On an intercepted follow up call on TT1 (session 2477), Son V. TRAN and Donald
21 K. JORDAN conversed about Donald K. JORDAN not providing enough money to Son
22 V. TRAN.

23 179. Seattle Police Department reports indicate on December 12, 2014, that
24 officers contacted Donald K. JORDAN and his live-in girlfriend of three years at
25 (**Residence No. 9**). Donald K. JORDAN and his girlfriend got into an argument and
26 Donald K. JORDAN agreed to gather personal belongings and leave for the night.

27 180. On April 2, 2015, ENTF Detective Will Hallifax went to this residence, a
28 condominium development. The manager of the condominium's stated Donald K.

JORDAN's lives at this residence (**Residence 9**) with his girlfriend, who is known to agents. The manager reported Donald K. JORDAN travels to and from his unit throughout all hours of the day. Court authorized GPS locates for Donald K. JORDAN's cellular phone frequently places Donald K. JORDAN in the vicinity of **Residence No. 9** particularly during typical sleeping hours such as 4:00 a.m.

Donald C. SCHOLOFF – Narcotics customer

181. On March 24, 2015, agents intercepted Cuong T. LE and Donald C. SCHOLOFF on TT4 (sessions 1255, and 1268). Donald C. SCHOLOFF ordered "two daytime and two nighttime" (meaning two ounces each of cocaine and heroin) from Cuong T. LE. Later the same day, surveillance observed and photographed Donald C. SCHOLOFF and Cuong T. LE meet at the prearranged meeting location. Donald C. SCHOLOFF got into Cuong T. LE's tan Lexus (**Vehicle No. 4**) for about one minute. Yen VU is with Cuong T. LE during the narcotic transaction. SCHOLOFF drove a green 1997 Chevrolet T10 Pickup bearing license C49136C (**Vehicle No. 18**).

182. On March 26, 2015, agents intercepted Cuong T. LE and Donald C. SCHOLOFF on TT4 (sessions 1695, 1704, and 1716). Donald C. SCHOLOFF asked Cuong T. LE how much for "half-pound". Cuong T. LE told Donald C. SCHOLOFF \$3,200 and the two agreed to meet in 40 minutes on Eddy Street (24th Avenue South/Eddy Street, Seattle a known residence associated with the DTO). Later the same day, surveillance observed and photographed Donald C. SCHOLOFF at 24th Avenue South/Eddy Street, Seattle and meet with Cuong T. LE. Surveillance observed Donald C. SCHOLOFF exit his green truck (**Vehicle No. 18**) and do a hand to hand narcotic transaction at the driver's window of Cuong T. LE's tan Lexus (**Vehicle No. 4**). Following this deal, surveillance followed Donald C. SCHOLOFF and conducted a traffic stop and identified Donald C. SCHOLOFF from his Washington driver's license. Officers determined Donald C SCHOLOFF's listed DOL residence is 618 NW 58th Street Upper Unit, Seattle.

183. On April 6, 2015 I observed the court authorized GPS locates for Donald C. SCHOLOFF's cellular phone to be in close proximity to the Golden West Motel, 23916 Highway 99, Room #28, Edmonds (**Residence No. 15**). I instructed surveillance to this location. At approximately 12:16 p.m. Seattle Police Officer J. Leenstra observed Donald C. SCHOLOFF exit Room #28, and get into a vehicle and leave from the hotel. GPS locates for Donald C. SCHOLOFF's cellular phone routinely place Donald C. SCHOLOFF at **Residence No. 15** during sleeping hours such as 4:00 a.m.

Steven J. CONNELL – Narcotics customer

184. On March 13, 2015, agents intercepted Son V. TRAN and Steven J. CONNELL on TT1 (session 956). Steven J. CONNELL ordered half-ounce cocaine and half-ounce heroin (using known coded words) from Son V. TRAN. Son V. TRAN told Steven J. CONNELL he owed \$1,225. They two agreed to meet later in the day. Later the same day, surveillance observed and photographed Steven J. CONNELL and Son V. TRAN meeting at a Renton parking lot where Steven J. CONNELL went to Son V. TRAN's silver Jaguar (**Vehicle No. 3**) and did a hand-to-hand narcotic transaction. Steven J. CONNELL arrived as a passenger in a different vehicle.

185. Based on surveillance from Steven J. CONNELL's October 15, 2014 arrest after leaving 10202 Myers Way South, Seattle (**Residence No. 8**), and CONNELL's post *Miranda* statements that he lived at (**Residence No. 8**) with his girlfriend Colleen E. Riggle, I believe **Residence No. 8** is CONNELL's residence.

186. Additionally, King County property records show **Residence No. 8** is owned by Charles E. Riggle. Investigators believe that Charles E. Riggle is Colleen E. Riggle's father. During interception, I believe Colleen E. Riggle used Steven J. CONNELL's cellular phone to talk to Son V. TRAN regarding purchasing amounts of narcotics for herself and CONNELL. Colleen E. Riggle lists her address as **Residence No. 8** with Washington DOL. Additionally, based on various intercepted calls, surveillance, and GPS data from phones belonging to DTO members delivering amounts of narcotics to Steven J. CONNELL, I believe that he resides at **Residence No. 8**.

Kimberle S. ALOJASIN – Narcotics customer

187. On March 12, 2015, agents intercepted Kimberle S. ALOJASIN and Son V. TRAN on TT2 (sessions 558, 559, and 561). Kimberle S. ALOJASIN ordered a half-ounce of crack cocaine from Son V. TRAN using known coded words. Kimberle S. ALOJASIN and Son V. TRAN agreed to meet at a Renton parking lot location. Later the same day, surveillance observed and photographed Kimberle S. ALOJASIN meeting with Son V. TRAN at the Renton parking lot. Kimberle S. ALOJASIN drove her black 2014 Toyota Camry bearing license AFK7948 (**Vehicle No. 19**) and Son V. TRAN drove his white Cadillac Escalade (**Vehicle No. 1**). Son V. TRAN got into Kimberle S. ALOJASIN's (**Vehicle No. 19**) vehicle for less than one minute to conduct the apparent narcotic transaction.

188. On March 17, 2015, agents intercepted Kimberle S. ALOJASIN and Son V. TRAN on TT2 (sessions 851 and 853). Kimberle S. ALOJASIN called Son V. TRAN and ordered a quarter-ounce of heroin from Son V. TRAN using known coded words. Kimberle S. ALOJASIN also complained about the quality of narcotics she obtained from "Kim" (Son T. NGUYEN, a known narcotic distributor for Son V. TRAN). Kimberle S. ALOJASIN and Son V. TRAN agreed to meet at a Seattle parking lot location. Surveillance observed and photographed Kimberle S. ALOJASIN meet with Son V. TRAN. Kimberle S. ALOJASIN drove her known black 2014 Toyota Camry (**Vehicle No. 19**). Son V. TRAN drove his white Lexus (**Vehicle No. 2**). Surveillance observed the two meeting in the parking lot for less than one minute to conduct the apparent narcotic transaction.

Niem H. DOAN – Narcotic supplier

189. On March 23, 2015, agents intercepted Cuong T. LE and Niem H. DOAN on TT4 (sessions 1003, 1009, 1045, 1102, 1112, 1119, 1131, 1132, and 1136). Cuong T. LE asked Niem H. DOAN to bring "MSG" (meaning methamphetamine) down. Cuong T. LE ultimately asked Niem H. DOAN for "5 MSG" and "1 coffee" (believed to be 5

1 pounds of methamphetamine and 1 kilogram of heroin). During a intercepted follow up
2 call Cuong T. LE and Niem H. DOAN had the following coded conversation:

3 Cuong T. LE: Today is grandma's birthday. Do you remember how old she is?

4 Niem H. DOAN: Grandma?

5 Cuong T. LE: Yeah

6 Niem H. DOAN: Which grandma?

7 Cuong T. LE: Our grandma's birthday is today. What is the total?

8 Niem H. DOAN: Oh oh.... grandma's birthday.... Grandma asks for coffee, but I
9 won't have coffee for her until tomorrow morning. I gave her MSG only.

10 Cuong T. LE: Oh yeah? So there are five only right?

11 Niem H. DOAN: Yes, five.

12 Cuong T. LE: Ok I know. It's grandma's birthday. Ok.

13 Based on information I know about Cuong T. LE and this DTO, I believed the
14 conversation was coded and they were talking about five pounds of methamphetamine
15 Niem H. DOAN planned to deliver to Cuong T. LE.

16 190. Later in the evening, agents intercepted calls between Cuong T. LE and
17 Niem H. DOAN were Cuong T. LE instructed Niem H. DOAN to exit the restaurant and
18 get into his vehicle.

19 191. At approximately 8:20 p.m., surveillance personnel observed Cuong T. LE
20 driving his tan Lexus (**Vehicle No. 4**) meet with a male believed to be Niem H. DOAN at
21 the Rainier BBQ Restaurant in Seattle (a known frequent meeting location for DTO
22 members). Niem H. DOAN was driving a silver Mercedes C300 bearing license
23 AMG3957 (**Vehicle No. 17**). Surveillance noted it was too dark for photographs.
24 Electronic surveillance installed at Rainier BBQ showed Cuong T. LE arriving in the rear
25 parking lot in his Lexus and dropping off a male believed to be Niem H. DOAN. Niem
26 H. DOAN then got into his Mercedes (**Vehicle No. 17**) with a passenger and drove from
27 the parking lot.

1 192. On March 24, 2015, agents intercepted Cuong T. LE and Niem H. DOAN
2 on TT4 (session 1210). Cuong T. LE asked Niem H. DOAN for “two coffees and one
3 rice” (meaning two kilograms of heroin and one kilogram of cocaine). Niem H. DOAN
4 asked Cuong T. LE why “brother Son has not come?” I knew Cuong T. LE was referring
5 to Son V. Son V. TRAN and asking why Son V. TRAN did not have narcotics to supply
6 to Cuong T. LE.

7 193. On March 26, 2015, agents intercepted Cuong T. LE and Niem H. DOAN
8 on TT4 (sessions 1661, 1726, and 1727). Cuong T. LE and DOAN agreed to meet at
9 Rainier BBQ Restaurant in Seattle. Surveillance observed and photographed Cuong T.
10 LE arrive at Rainier BBQ but surveillance did not observe Niem H. DOAN or his
11 vehicle.

12 194. On March 27, 2015 agents intercepted Cuong T. LE and Niem H. DOAN
13 on TT4 (session 1846). Cuong T. LE and Niem H. DOAN discussed coded narcotic
14 transaction believed to be conversation arranging a large narcotic transaction.
15 Specifically, Niem H. DOAN stated, “...It seems that we’re going to eat, eat, um, 3
16 bowls and 2 cups of coffee. Is that correct?” Cuong T. LE responded by referring to an
17 unknown person cooks Bun bo hue (Vietnamese soup) and invite people to eat. Niem H.
18 DOAN stated, “uh, 3, 3, Bun bo hue and 2 cups of coffee, that’s all , right?” Cuong T.
19 LE and Niem H. DOAN affirmed the transaction.

20 195. On April 7, 2015, I obtained a pen register trap and trace and tracking
21 warrant for Niem H. DOAN’s cellular phone (206) 327-5446. This warrant also
22 authorized 15-minute GPS locates on the phone. The phone is subscribed to Nhung P.
23 Thi at 11607 7th Avenue SE, Everett (**Residence No. 14**) as of September 21, 2014.

24 196. I also learned DEA Special Agent Christine Truong was also investigating
25 Niem H. DOAN for suspected narcotic trafficking. Agent Truong provided detailed
26
27
28

1 information to me relayed from her Confidential Source (CS).⁵ Agent Truong stated the
2 CS had known Niem H. DOAN for more than one year and during that time knew Niem
3 H. DOAN was a high-level narcotics trafficker supplying kilogram and ounce-level
4 amounts of narcotics. The CS stated Niem H. DOAN owned an auto body shop located
5 at 19411 Highway 99, Lynnwood (**Business No. 1**). The CS reported in early December
6 2014, the CS was inside this auto body business with Niem H. DOAN when Niem H.
7 DOAN showed the CS an unknown amount of narcotics. The CS also stated Niem H.
8 DOAN's phone number was (206) 327-5446. The CS also stated he/she knew Niem H.
9 DOAN's girlfriend is Nhung Phuong Thi LAM and that Niem H. DOAN lived with
10 Nhung Phuong Thi LAM at a house in Everett (**Residence No. 14**). The CS also
11 identified Niem H. DOAN's brother as Vong H. DOAN and stated Vong H. DOAN is
12 involved in distributing narcotics with Niem H. DOAN.

13 197. On January 7, 2015, Agent Truong conducted surveillance at 19411
14 Highway 99, Lynnwood (**Business No. 1**). Agent Truong observed a black 2003
15 Mercedes 500 bearing license ASB0717 parked directly outside the residence. According
16 to Washington DOL, the registered owner is Vong H. DOAN, 8444 42nd Ave S, Seattle.

17 198. On January 8, 2015, Agent Truong had the CS place a controlled phone call
18 to Niem H. DOAN (206) 327-5446. During the call with the CS, Agent Truong heard
19 Niem H. DOAN quote drug prices of \$500, \$1,000, and another \$1,000 for ounce
20 quantities of heroin, crystal methamphetamine, and cocaine respectively. Agent Truong
21 heard Niem H. DOAN tell the CS he was awaiting a shipment (of drugs) due to arrive
22 very soon and would let the CS know when it arrived. The CS and DOAN agreed to talk
23 at a later date to arrange the purchase of drugs.

24 199. On January 27, 2015, Agent Truong once again had the CS place a
25 controlled phone call to Niem H. DOAN at (206) 327-5446. During the conversation,
26

27 ⁵ Agent Truong stated the CS is a reliable CS who has provided information to for DEA and other law
28 enforcement agencies to include ENTF in the past three years. The CS was being paid for their cooperation. The
CS has a felony conviction for trafficking marijuana.

1 Niem H. DOAN told the CS he had kilogram amounts of cocaine to purchase for \$35,000
2 to \$37,000 and kilogram amounts of heroin for \$32,000. Niem H. DOAN and the CS
3 agreed to meet on another day to conduct the drug transaction.

4 200. I examined the GPS locates on Niem H. DOAN's cellular phone and
5 determined during business hours his phone GPS consistently placed Niem H. DOAN at
6 or near **Business No. 1**. During typically sleeping hours such as at 4:00 a.m., Niem H.
7 DOAN's phone GPS consistently placed him at or near **Residence No. 14**. According to
8 Washington DOL, Niem H. DOAN's girlfriend's (Nhung P. LAM) listed address is
9 **Residence No. 14**. Additionally, the Clear law enforcement database listed Nhung P.
10 LAM is associated with this residence. Agent Truong also obtained a Snohomish County
11 Public Utility District Bill for **Residence No. 14** with a billing date of February 26, 2015
12 addressed to Nhung Lam, 11607 7th Ave SE, Everett (**Residence No. 14**).

13 201. On or about April 10, 2015, surveillance detectives followed Niem H.
14 DOAN to his residence at 11607 7th Avenue Southeast, Everett (**Residence No. 14**) also
15 supported by court authorized electronic surveillance of GPS locates for Niem H.
16 DOAN's cellular phone.

17 202. On April 17, 2015, ENTF Detective M. Halsted responded to 19411
18 Highway 99 (Business 1) to conduct surveillance on Niem H. DOAN's business.
19 Detective Halsted observed a vehicle for sale parked directly outside the business.
20 Detective Halsted went to the business to pretend to inquire about the vehicle for sale.
21 Detective Halsted was met by an Asian male. Detective Halsted spoke to the male about
22 purchasing the vehicle. During the interaction, Detective Halsted looked inside **Business**
23 **No. 1** and determined there was an office that he could not see in that Niem H. DOAN
24 could have been inside. I examined the GPS locates on DOAN's cellular phone and
25 determined his phone was at or near Business 1 during this time. The male Detective
26 Halsted spoke to provided his name of "Ryan" and his phone number of "(425) 283-
27 3311". I conducted a check of this phone number on DOAN's pen register and
28 determined DOAN communicated with this phone 12 times between April 7, 2015 (the

1 beginning of the pen register) and April 15, 2015. In addition, on April 17, 2015,
2 surveillance agents saw and photographed Niem H. DOAN at **Business No. 1**.

3 **Tony V. NGUYEN – Narcotic customer**

4 203. On March 24, 2015, agents intercepted Cuong T. LE and Tony V.
5 NGUYEN on TT4 (session 1252). Tony V. NGUYEN told Cuong T. LE he needs “half
6 black” (meaning a half-ounce of heroin). Later the same day, surveillance observed and
7 photographed Tony V. NGUYEN get into Cuong T. LE’s tan Lexus (**Vehicle No 4**) and
8 conduct an apparent narcotic transaction. Tony V. NGUYEN drove the white Mitsubishi
9 Lancer bearing license AOF2058 (**Vehicle No. 21**).

10 204. On March 27, 2015, agents intercepted Cuong T. LE and Tony V.
11 NGUYEN on TT4 (session 1804). NGUYEN stated, “Uncle, I need 2 rock” (meaning
12 two ounces of crack cocaine). The two agreed to meet at approximately 11:00 a.m. at the
13 Viet Wah parking lot in Seattle. At approximately 11:10 a.m., surveillance observed and
14 photographed Cuong T. LE and Tony V. NGUYEN meet at the parking lot. Cuong T. LE
15 walked over to Tony V. NGUYEN’s vehicle the white Mitsubishi Lancer (**Vehicle No.**
16 **21**) and conducted an apparent narcotic exchange. Cuong T. LE was driving his tan
17 Lexus (**Vehicle No. 4**).

18 **COMMON CHARACTERISTICS OF DRUG TRAFFICKERS.**

19 205. As a result of my training and experience, and based on my consultation
20 with other agents and law enforcement officers, I have an understanding of the manner in
21 which narcotics are distributed and the various roles played by individuals and groups in
22 their distribution. I have encountered and have become familiar with various tools,
23 methods, trends, paraphernalia and related articles utilized by various traffickers in their
24 efforts to import, conceal and distribute controlled substances. I am also familiar with the
25 manner in which drug traffickers use telephones, often cellular telephones, to conduct
26 their unlawful operations. I am also familiar with the manner in which drug traffickers
27 will use weapons to protect their drug activities and further its goals.

1 206. Based upon my training, experience, and conversations with other
2 experienced officers and agents, I know that:

3 a. It is common for drug and weapons dealers to use cellular phones
4 subscribed to in a name other than their own. It is also common for drug dealers to use
5 "pre paid" cellular phones for which no real subscriber information is available.

6 b. During the execution of search warrants at the residences of drug
7 dealers, it is common to find papers, letters, billings, documents, and other writings,
8 which show ownership, dominion, and control of vehicles, residences, and/or storage
9 units.

10 c. It is common for drug dealers to secrete contraband, proceeds of
11 drug sales, and records of drug transactions in secure locations within their vehicles,
12 residences, and/or storage units for their ready access and to conceal these items from law
13 enforcement authorities.

14 d. Narcotics traffickers often maintain books, records, receipts, notes,
15 ledgers, airline tickets, money orders, and other papers relating to the transportation,
16 ordering, sale and distribution of controlled substances.

17 e. Narcotics traffickers sometimes "front," that is, provide on
18 consignment, controlled substances to their clients. These books, records, receipts, notes,
19 ledgers, commonly known as "pay and owe sheets," are maintained where the traffickers
20 have ready access to them. Increasingly, sophisticated DTO's maintain these records
21 electronically, either on computers or on cell phones or so-called "smart phones."

22 f. Traffickers of controlled substances commonly maintain addresses
23 or telephone numbers in books or papers which reflect names, addresses, and/or
24 telephone numbers of their clients and associates in the trafficking organization. Again,
25 sophisticated DTO's maintain these records electronically, either on computers or on cell
26 phones or so-called "smart phones."

27 g. Persons involved in drug trafficking conceal in their residences
28 caches of drugs, large amounts of currency, financial instruments, precious metals,

1 jewelry, and other items of value and/or proceeds of drug transactions as well as evidence
2 of financial transactions relating to obtaining, transferring, secreting, or the spending of
3 large sums of money made from engaging in narcotics trafficking activities.

4 h. Drug traffickers amass large proceeds from the sale of drugs and that
5 they attempt to legitimize these profits. To accomplish these goals, drug traffickers
6 utilize domestic banks and their attendant services, securities, cashier's checks, safe
7 deposit boxes, money drafts, letter of credit, brokerage houses, real estate, shell
8 operations, and business fronts. Persons involved in drug trafficking and or money
9 laundering keep papers relating to these activities for future reference.

10 i. Drug traffickers very often place assets in corporate entities in order
11 to avoid detection of these assets by government agencies.

12 j. Since the Government's efforts at seizing and forfeiting drug related
13 assets have been widely publicized in the news media and by word of mouth, I know that
14 drug traffickers often place assets in names other than their own to avoid detection of
15 these assets by government agencies. Even though these assets are in other person's
16 names, the drug dealers actually own and continue to use these assets and exercise
17 dominion and control over them.

18 k. My experience shows, and Court decisions have recognized, that
19 unexplained wealth is probative evidence of crimes motivated by greed, in particular,
20 trafficking in controlled substances.

21 l. Evidence relating to ownership and interest in real property is often
22 located at the residences, businesses and banks of traffickers.

23 m. Drug traffickers take, or cause to be taken, photographs of
24 themselves, their associates, their property, and their product. These traffickers usually
25 maintain these photographs in their possession.

26 n. Narcotic traffickers who distribute controlled substances must
27 maintain on hand amounts of U.S. currency in order to maintain and finance their on-
28 going narcotics business. Traffickers commonly deal in currency because of its

1 untraceable nature, and also convert their illicit currency into currency equivalents such
2 as cashier's checks and money orders.

3 o. Traffickers utilize cell phones, smart phones, Blackberry devices,
4 text messages and/or email devices for ready access to their clientele for the purpose of
5 maintaining their drug related business, and to store customer and supplier names and
6 contact information.

7 p. Persons trafficking and using controlled substances commonly sell
8 or use more than one type of controlled substance at any one time.

9 q. It is common for drug dealers to also be users of their product, and it
10 is common for the drug user to keep paraphernalia, such as syringes, pipes, spoons,
11 containers, straws, razor blades, and other items which are associated with the use of
12 controlled substances as well as paraphernalia associated with the manufacture and sale
13 of controlled substances such as scales, sifters, containers, cutting agents and other
14 packaging materials associated with the manufacturing, processing and distribution of
15 controlled substances in their vehicles, residences, and/or storage units.

16 r. Drug traffickers commonly have in their possession, on their person,
17 and at their residences, and/or in their vehicles and storage units, firearms, and other
18 weapons which are used to protect and secure a drug trafficker's property. Such property
19 may include, but is not limited to, controlled substances, paraphernalia for the use or sale
20 of controlled substances, books, records, jewelry, and U.S. currency.

21 s. Based on my experience, evidence of drug trafficking, such as the
22 items described above, is likely to be found where the drug dealers reside, in their
23 vehicles, and in their storage units, despite the lack of direct evidence of criminal activity
24 at the residence or the passage of several months since the last reported activity.

25 t. I am familiar with case law in the Ninth Circuit that holds that
26 evidence of drug trafficking, such as the items described herein, is likely to be found
27 where the drug dealers reside, and a search warrant may be properly issued for a
28 suspected drug dealer's residence (or temporary residence or storage locker) despite the

1 lack of direct evidence of criminal activity at the residence or the passage of a number of
2 months since the last reported activity.

3 u. I know that cocaine, heroin, and methamphetamine are controlled
4 substances. In my experience and the experience of the law enforcement agents with
5 whom I associate, the illegal distribution of controlled substances is frequently a
6 continuing activity over months and years.

7 v. Persons involved in the trafficking of controlled substances typically
8 will obtain and distribute drugs on a regular basis, much as a distributor of a legal
9 commodity would purchase stock for sale. Similarly, such drug traffickers will maintain
10 an "inventory," which will fluctuate in size depending upon the demand for and the
11 available supply of the product.

12 w. It has been my experience that drug traffickers keep records of their
13 illegal activities also for a period of time extending beyond the time during which the
14 trafficker actually possesses/controls illegal controlled substances, in order to maintain
15 contact with criminal associates for future transactions and so that the trafficker can have
16 records of prior transactions for which the trafficker might still be owed money or might
17 owe someone else money.

18 x. The aforementioned items are often maintained by the drug
19 trafficker in secure locations within the premises under their dominion and control, in
20 their vehicles, storage units, residences, and/or on their person, not only for ready access,
21 but also to prevent them from being stolen by other drug dealers and to conceal them
22 from law enforcement. These items are often concealed on property in/and around the
23 trafficker's residences, in order to conceal the illicit items from law enforcement, should
24 a search by law enforcement at the location occur.

25 y. Additionally, I know that drug dealers sometimes attempt to insulate
26 themselves from detection by law enforcement by utilizing separate addresses from their
27 actual residence to store illegal narcotics and currency derivative of the narcotics trade.
28

1 z. I know, from this investigation, that members of this DTO acquire
2 firearms for their own use as part of the DTO's activities.

3 aa. I know that drug traffickers often transport narcotics, cash, and
4 weapons in hidden compartments (sometimes referred to as "traps") inside their vehicles
5 in an attempt to defeat law enforcement efforts to find and seize contraband. Indeed, in
6 this investigation, we seized approximately \$30,000 in cash from inside such a
7 compartment, which was located behind the instrument cluster of the vehicle. I also
8 know that accessing these compartments sometimes requires drug traffickers to partially
9 disassemble the vehicle. Lastly, I also know that drug traffickers will often use auto
10 repair and auto body shops (like Business 1, owned and/or controlled by DOAN) to
11 construct, load, and unload these compartments. Based on the wiretap, and on
12 information provided by the DEA CW, I believe DOAN is a high-level multi-kilogram
13 drug trafficker. Accordingly, I also believe there is probable cause to believe that DOAN
14 may be using Business 1 for this purpose, and to store contraband.

15 **REQUEST FOR "NO-KNOCK" AND ALL HOURS WARRANT FOR**
16 **RESIDENCE 11 (Phuong A. Nguyen).**

17 207. I respectfully request the Court's permission to execute the warrant at the
18 residence of Phuong A. NGUYEN, **Residence No. 11** – 12235 Southeast 206th Street,
19 Kent, Washington, without first knocking and announcing law enforcement's presence.

20 208. As set forth above, the occupant of Residence No. 11, Phuong A.
21 NGUYEN, has been contacted in possession of firearms on two separate occasions since
22 the beginning of this year. In addition, based on wire intercepts, on the second occasion
23 Phuong A. NGUYEN intended to use the firearm recovered from his vehicle in
24 furtherance of a dispute with individuals he believed had informed on him. Based on his
25 criminal history information, Phuong A. NGUYEN also has an extensive criminal history
26 that includes a conviction for Assault in the second degree and firearms possession from
27 2004.

28 209. Based on his history, I believe there is probable cause to believe that
Phuong A. NGUYEN may possess yet another firearm, and is a risk to law enforcement
officers executing this search warrant. **Residence No. 11** is believed to be the residence
of Phuong A. NGUYEN.

1 210. I have been advised that the law authorizing the execution of so-called “no-
2 knock” search warrants requires that exigent circumstances exist to justify law
3 enforcement’s entry without first knocking and announcing law enforcement’s presence.
4 Based on the foregoing, I respectfully submit that said circumstances apply to this
5 location. Similar concerns also serve as good cause to execute the search warrant at this
6 location outside normal hours (6:00 a.m. – 10:00 p.m.) pursuant to 21 U.S.C. § 878,
7 which authorizes the Court to permit service of warrants at any time of the day or night if
8 grounds exist for service of the warrant at such times. Authorizing law enforcement to
9 execute the search at **Residence No. 11** without prior warning, and outside of normal
10 warrant execution hours, will serve to mitigate the risks to the executing officers and to
11 the occupant[s] of this location.

12 //

13 //

14 //


CONCLUSION

211. Based on the foregoing information, I respectfully submit there is probable cause to believe that evidence of the crimes set forth above, as more particularly described in Attachment B hereto, can be found at each of the Subject Locations described in Attachment A hereto.



Brandon James, Affiant
TFO, Federal Bureau of Investigation

SUBSCRIBED AND SWORN before me this 20 day of April, 2015


THE HONORABLE DEAN BRETT
United States Magistrate Judge

Attachment A
Locations to be Searched

RESIDENCES

1) Residence No. 1: 5724 South Bangor Street, Seattle, Washington, 98178

The address 5724 S Bangor St is a detached, two story, single family home. It is located on the north side of S Bangor Street. The house is accessed by a long driveway which is located between addresses 5722 S Bangor Street and 5728 S Bangor Street. The driveway services a cluster of four houses. The target address is the last house on the left at the end of the driveway. The numbers "5724" are nailed horizontally onto the house on the left side of the two-car garage, which faces the south. On the west side of the garage there is a covered porch with the front door that also faces south. The house is green in color with brown accent color and white trim. It has a gray composite roof.

2) Residence No. 2: 5571 18th Avenue South, Seattle, Washington, 98108

The property located at 5571 18th Avenue S, in Seattle, King County, Washington 98108. The property is on the northwest corner of 18th Avenue S and S Orcas Street. The property appears to include a one-story single-family residence and a detached garage. It is a white house, with white trim and a red roof. The front door faces south, toward S Orcas Street; the numbers "5571" appear to the right of the front door. The detached garage shares the same design as the house, has a red door, and is situated on the west edge of the property.

3) Residence No. 3: 575 Graham Avenue Northeast, Renton, Washington, 98059

575 Graham Avenue NE is a two-story, single family residence. It is located at the southwest corner of Graham Ave NE and NE 6th St. The house has tan-colored siding (with some gray siding) and white trim. The numbers "575" are in vertical black numbers on the trim of the north edge of the northern-most garage door, which faces east. It has a gray composite roof.

4) **Residence No. 4: 1802 19th Avenue South, Seattle, Washington, 98144**

1802 19th Ave S., Seattle is a two story residence. The house is painted tan and orange, with white trim. The two garage doors are on the west side of the house. The numbers "1802" are posted above and between the garage doors.

5) **Residence No. 5: 11115 59th Avenue South, Seattle Washington, 98178**

The address 11115 59th Ave. S is a detached, one-story, single family home. The residence is located on the west side of 59th Ave. S, one house south of the intersection of 59th Ave. S and S Avon St. The house is accessed by a short driveway off of 59th Ave S. The numbers "11115" are nailed horizontally onto the house to the right of the front door, which faces east. The house is white in color with reddish brown shutters and a blue stairway leading to the front door. It has a gray composite roof.

6) **Residence No. 6: 12023 46th Avenue South, Tukwila, Washington, 98178**

The house located at 12023 46th Ave S Tukwila, is light tan in color with white and tan trim. The front door appears to have a tan (matching house color) metal security door on it. The numbers "12023" are posted in gold vertically next to the garage door.

7) **Residence No. 7: 4700 South 172nd Place, SeaTac, Washington, 98188**

The address 4700 S 172nd PL, SeaTac is single story, single family home. The residence is located on the north side of S 172nd Pl and has the numbers "4700" posted in the color gray to the right of the front door just below a porch light. The home is white in color with gray trim and a dark gray colored roof. The front door faces S 172nd PL and is centered in the middle of the home. There are two windows on both sides of the front door. A medium/large window sits to its left and a larger window to the right of the front door. There is a gravel driveway to the right of the residence that leads to a garage structure. The garage is detached from the home and sits back off the 3/4 corner of the home.

8) Residence No. 8: 10202 Myers Way South, Seattle, Washington, 98168

10202 Myers Way S., Seattle is a beige single-family home with white trim and an attached garage. "10202" is clearly visible in black numbers attached to the west wall of the house facing Myers Way, between two windows. 10202 Myers Way S. is located to the south of Aqua way S. and to the north of 101st St. on the east side of Myers Way, South.

9) Residence No. 9: 13717 Linden Avenue North #225, Seattle, Washington, 98133

The address 13717 Linden Ave N, Seattle is a three story condominium complex called the "Linden Park Condominiums." The building is a three story residential condominium complex over a basement parking garage. The building and garage are secured. The building is cream in color with green trim. The complex front door is located on the east side of the building and faces east toward Linden Ave N. The name of the complex and the numbers "13717" are posted above the complex front door. The unit #225 is located in the west wing of the building on floor two. The door is the northeast corner unit of the west central hallway, located next to the second floor north exit door. The door faces west. The unit door is white and has gold-colored metal numbers "225" posted on the middle of the door.

10) Residence No. 10: 12005 76th Avenue South, Seattle, Washington, 98178

The residence 12005 76th Ave S in Seattle is a single family, detached home. The structure is a two story building that is tan in color with white trim. It has a grey composite roof. The house is located on the southwest corner of S 120th St and 76 Ave S. The house is accessed via the first driveway on the west side of 76th Ave S, just south of the intersection with S 120th St. There is a black mailbox out front with gold numbers "12005." There are also numbers "12005A" to the left of the front door in white lettering on black stickers. The front door faces east and is accessed by the front porch attached to the upper story of the home. On the north side of the house there is a back door with black numbers "7569B" mounted horizontally to the right of door. The back door faces

north, and accesses the lower story of the house. The entire north and east side of the property has a dilapidated fence around it made up of wood boards and plywood. A review of parcel viewer for the address "7569 S 120th St, Seattle" or "7569B S 120th St, Seattle" does not show a valid address. There is no separate, visible mailbox for 7569. There are no access points to the property, such as driveway/walkway, off of S 120th St. The last valid address listed on parcel viewer on S 120th St prior to 76th Ave S is 7565 S 120th St. The address 7569B S 120th St, Seattle appears to be an invalid address according to King County.

11) Residence No. 11: 12235 Southeast 206th Street, Kent, Washington, 98031

The address 12235 SE 206th St, Kent is a brown colored mobile home single story, single family home. The home sits on the south side of SE 206th St and has the numbers "12235" posted vertically on the left side (north east edge) on the front of the home. There are two visible points of entry from SE 206th St. The first point of entry is on the east side of the home about two thirds the way down the structure. There is a small stair case leading to this door. The second point of entry is on the west side of the structure. This area is covered by a car port area. There are windows on the front of the home facing SE 206th St that were cover with blinds at the time.

12) Residence No. 12: 643 Southwest 122nd Street, Burien. Washington, 98146

The house is located at 643 SW 122nd St, Seattle, it is a two story house and appears to be a single family residence. The house is bright green in color with white trim. The windows in front of the house are surrounded by white trim and have black bars metal bars on them. The front doors and side door have metal screen security doors on them. The roofing in dark gray asphalt shingles. There are several trees at the front on the house and shrubs surrounding the house.

13) Residence No. 13: 31234 8th Avenue South, Federal Way, Washington, 98003

The residence at 31234 8th Ave S. is a single-family, rambler-style house. The house is situated on the east side of 8th Ave South, within the city of Federal Way, County of King, State of Washington. The front door faces south and is covered with a white

colored screen/storm door. It has a two-tone, tan and brown, colored siding with white trim. The numbers "31234" are mounted horizontally on the front of the house between the front door and the attached garage. A six-foot tall wood fence lines the sides of the property on the backside of the house.

14) Residence No. 14: 11607 7th Avenue Southeast, Everett, Washington, 98208

11607 7th Ave SE is a single-family residence. It has gray siding with white trim. The numbers "11607" are attached vertically to a pillar that is to the right of the front door. A stairway leads to the front door, which faces north.

15) Residence No. 15: 23916 Highway 99 Room #28 (Golden West Motel), Edmonds, Washington, 98026

The address 23916 Highway 99 is the Golden West Motel. It is located on the west side of Highway 99, between the Taco Time and the onramp for westbound Highway 104. The driveway is located between the two large business signs that say "Golden West Motel." A white mailbox for the property is located on the north side of the driveway with stickers "23916" attached to it. The Motel is made up of three buildings. One building is a one story structure that runs east-west on the south end of the property. The second building is a two story structure that runs north-south on the west side of the property. The target unit is located in the third building, which is a one story structure that runs east-west on the north side of the property. The building is tan in color and has a grey composite roof. This building consists of units 26-30 and the manager's office. Unit 28 is in the middle of the building with a red door that faces south, toward the driveway. Black number "28" is nailed to the right of the target door.

BUSINESS

1) Business No. 1: 19411 Highway 99 Lynnwood, Washington, 98036

The address 19411 Highway 99 Lynnwood is located on the east side of Highway 99 in Lynnwood. It is a business labeled "Western Motorcoach" and "Country Coach". On the rear (east side of the business) are 4 attached maintenance garage bays. The southeast garage bay is occupied by Niem DOAN's business. The physical address remains 19411 Highway 99, Lynnwood.

VEHICLES

- 1) Vehicle No. 1: White 2007 Cadillac Escalade, Washington License Plate APZ1179
- 2) Vehicle No. 2: White 2006 Lexus GS3, Washington License Plate ARZ5325
- 3) Vehicle No. 3: Silver 2000 Jaguar S, Washington License Plate AQC0425
- 4) Vehicle No. 4: Tan 1997 Lexus ES, Washington License Plate 868-YMH
- 5) Vehicle No. 5: Silver 1997 Toyota Camry, Washington License Plate ARZ4557
- 6) Vehicle No. 6: Gray 2006 Mercedes E320, Washington License Plate ATJ1438
- 7) Vehicle No. 7: Blue 1998 Nissan Quest van, Washington License Plate AKL1020
- 8) Vehicle No. 8: White 1999 Ford Expedition, Washington License Plate ALD1402
- 9) Vehicle No. 9: Green 1993 Toyota Camry, Washington License Plate AAT9509
- 10) Vehicle No. 10: Gray 2005 Toyota Sienna, Washington License Plate AIV0209
- 11) Vehicle No. 11: Burgundy 1992 Ford Pickup, Washington License Plate B72126G
- 12) Vehicle No. 12: Silver 1996 Mitsubishi Eclipse, Washington License Plate
AQA6399
- 13) Vehicle No. 13: White 1999 Mercury Mountaineer, Washington License Plate
ATG2524
- 14) Vehicle No. 14: Silver 2004 Kia Temp#1666027A
- 15) Vehicle No. 15: Silver 2006 Honda Civic, Washington License Plate ANC2840
- 16) Vehicle No. 16: Blue 1999 Ford Taurus Station Wagon
- 17) Vehicle No. 17: Silver 2013 Mercedes C300, Washington License Plate AMG3957
- 18) Vehicle No. 18: Green 1997 Chevrolet T10 PU, Washington License Plate
C49136C
- 19) Vehicle No. 19: Black 2011 Toyota Camry, Washington License Plate AFK7948
- 20) Vehicle No. 20: Silver 2000 Honda CRV, Washington License Plate ALD8415
- 21) Vehicle No. 21: White 2014 Mitsubishi Lancer, Washington License Plate
AOF2058

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution and possession with intent to distribute controlled substances, to wit, cocaine, heroin, and methamphetamine in violation of 21 U.S.C. § 841(a)(1), Use of a communications facility in furtherance of a felony drug offense in violation of 21 U.S.C. § 843(b), Conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, Laundering of monetary instruments in violation of 18 U.S.C. § 1956, Possession or Receipt of a Firearm or Ammunition by a Prohibited Person, in violation of 18 U.S.C. § 922(g), and Possession of a Firearm in furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c), including but not limited to the following:

1. Controlled Substances: Including but not limited to cocaine, heroin and methamphetamine.
2. Drug Paraphernalia: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Drug Transaction Records: Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug amounts and prices, maps or directions, and similar items.
5. Cash and Financial Records: Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashiers checks, and similar items, and money counters.
6. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property occupants, friends and relatives of the property occupants, or

suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.

12. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,

13. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.

b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.

c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.

e. Collection accounts: statements and other records.

- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.

17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close said compartments.

22. Cell Phones: Cellular telephones and other communications devices including Blackberries may be seized, and searched for the following items:

- a. Assigned number and identifying telephone serial number (ESN, MIN, IMSI, or IMEI);
- b. Stored list of recent received, sent, and missed calls;
- c. Stored contact information;
- d. Stored photographs of narcotics, currency, firearms or other weapons, evidence of suspected criminal activity, and/or the user of the phone or suspected co-conspirators, including any embedded GPS data associated with those photographs;
- e. Stored text messages.