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★ AUG 31 2018 ★

LONG ISLAND OFFICE

CNR  
F. #2018R00062

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TO BE FILED UNDER SEAL

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UNITED STATES OF AMERICA

- against -

ISMAIL LATIF,  
also known as "Dot,"

Defendant.

COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF APPLICATION FOR  
ARREST WARRANT AND  
SEARCH WARRANTS

(T. 21, U.S.C., §§ 841(a)(1) and 846)

**MJ - 18 815**

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UNITED STATES OF AMERICA

- against -

THE PREMISES KNOWN AND DESCRIBED  
AS 117 N. 18<sup>TH</sup> STREET, WYANDANCH, NEW  
YORK 11798 (SUBJECT PREMISES #1);

THE PREMISES KNOWN AND DESCRIBED  
AS 61 ANDREWS AVENUE, WYANDANCH,  
NEW YORK 11798 (SUBJECT PREMISES #2);  
and

THE PREMISES KNOWN AND DESCRIBED  
AS 184 DIANA DRIVE, MASTIC BEACH, NEW  
YORK 11951 (SUBJECT PREMISES #3).

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EASTERN DISTRICT OF NEW YORK, SS:

SCOTT J. KNOX, being duly sworn, deposes and states that he is a Special  
Agent with the Drug Enforcement Administration, duly appointed according to law and  
acting as such.

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Upon information and belief, in or about and between May 2018 and July 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ISMAIL LATIF, also known as "Dot," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing ten grams or more of an analogue of fentanyl, to wit: 2-furanylbenzyl fentanyl, contrary to Title 21, United States Code, Sections 841(a)(1) and 846.

(Title 21, United States Code, Section 841(a)(1) and 846)

Further, upon information and belief, there is probable cause to believe that there will be kept and concealed at the three premises known and described as THE PREMISES KNOWN AND DESCRIBED AS 117 N. 18<sup>TH</sup> STREET, WYANDANCH, NEW YORK 11798, INCLUDING ANY LOCKED OR CLOSED CONTAINERS THEREIN AND OUTBUILDINGS (SUBJECT PREMISES #1); THE PREMISES KNOWN AND DESCRIBED AS 61 ANDREWS AVENUE, WYANDANCH, NEW YORK 11798, INCLUDING ANY LOCKED OR CLOSED CONTAINERS THEREIN AND OUTBUILDINGS (SUBJECT PREMISES #2); and THE PREMISES KNOWN AND DESCRIBED AS 184 DIANA DRIVE, MASTIC BEACH, NEW YORK 11951, INCLUDING ANY LOCKED OR CLOSED CONTAINERS THEREIN AND OUTBUILDINGS (SUBJECT PREMISES #3)(collectively, the "SUBJECT PREMISES"), within the Eastern District of New York, certain property, namely the items set forth on Attachment A hereto, all of which constitute evidence, fruits and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846. The items to be seized include any of the items listed in Attachment A that are maintained within other

closed or locked containers, including safes and other containers that may be further secured by locks of various kinds.

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

I. INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration ("DEA") and have been since 1996. I have participated in numerous investigations involving the trafficking of narcotics, including heroin, narcotic pain pills, fentanyl and fentanyl analogues. Through my training and experience – which has included debriefing numerous cooperating drug traffickers, conducting numerous searches of locations where drugs and drug proceeds have been found and conducting surveillance of individuals engaged in drug trafficking – I have become familiar with the manner in which illegal drugs are distributed, the method of payment for such drugs and the efforts of persons involved in such activity to avoid detection by law enforcement. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. In or about November 2017, the DEA and other law enforcement agencies (including the New York State Police and the Suffolk County Police Department) (collectively, the "Investigating Agencies") initiated an investigation into the distribution of

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<sup>1</sup> Because the purpose of this Complaint and Affidavit is to set forth only those facts necessary to establish probable cause to arrest and to search the SUBJECT PREMISES, I have not described all the relevant facts and circumstances of which I am aware.

large quantities of fake oxycodone pills in Suffolk County, New York, which pills were suspected to contain fentanyl, a semi-synthetic opioid narcotic drug that is more potent than oxycodone. In or about and between November 2017 and February 2018, the Investigating Agencies purchased fake oxycodone pills from an individual on several occasions in Suffolk County ("~~CS1~~"). Drug lab results of the fake oxycodone pills obtained by the Investigating Agencies indicated that the pills contained cyclopropyl fentanyl – a fentanyl analogue and Schedule I controlled substance.

3. In or about April 2018, the Investigating Agencies arrested the individual who sold the fake oxycodone pills ("~~CS1~~"), who agreed to provide information to the Investigating Agencies and work in a proactive capacity. At or around the time of CS1's arrest, CS1 indicated that the source for the fake oxycodone pills was the defendant ISMAIL LATIF, also known as "Dot." CS1 indicated that LATIF's phone number was stored in CS1's phone, which CS1 had used to coordinate the purchases of fake oxycodone pills with LATIF. CS1 also indicated that CS1 had purchased the fake oxycodone pills from LATIF in or around SUBJECT PREMISES #1 and SUBJECT PREMISES #2. CS1 also stated that LATIF is a member of the Brim set of the Bloods, a violent street gang operating in Suffolk County. CS1 also stated in sum and substance that LATIF has gang associates who have served as look-outs for LATIF at SUBJECT PREMISES #2.

4. As described in greater detail below, in or about and between May 2018 and July 2018, CS1, at the direction of the Investigating Agencies, purchased hundreds of fake oxycodone pills from the defendant ISMAIL LATIF, also known as "Dot," on numerous occasions at various locations in Suffolk County including at or around the SUBJECT PREMISES. Drug lab results of some of the fake oxycodone pills indicated that

the pills contained more than ten grams of 2-furanylbenzyl fentanyl, a fentanyl analogue and Schedule I controlled substance.

## II. THE DEFENDANT

5. The defendant ISMAIL LATIF, also known as “Dot,” is a black male who is believed to reside at 184 Diana Drive, Mastic Beach, New York, i.e. SUBJECT PREMISES #3. LATIF has a lengthy criminal history, which includes both felonies and misdemeanors, drug trafficking offenses and violent crimes. For example, on or about October 18, 2004, LATIF was convicted upon a plea of guilty to Assault in the Third Degree: With Intent to Cause Physical Injury, a Class A misdemeanor in violation of New York Penal Law 120.00(1) and sentenced to 80 days’ imprisonment. On or about December 8, 2004, LATIF was convicted upon a plea of guilty to Attempted Burglary in the Second Degree, a Class D felony in violation of New York Penal Law 140.25 and sentenced to 180 days’ imprisonment. On or about May 16, 2006, LATIF was convicted upon a plea of guilty to Criminal Possession of Stolen Property in the Fifth Degree, a Class A misdemeanor in violation of New York Penal Law 165.40 and sentenced to 4 months’ imprisonment. On or about January 8, 2008, LATIF was convicted upon a plea of guilty to Criminal Possession of a Controlled Substance in the Seventh Degree, a Class A misdemeanor in violation of New York Penal Law 220.03, and Driving While Ability Impaired by Drugs: Prior Conviction Within 10 Years, a Class E Felony in violation of New York Vehicle and Traffic Law 1192(4), and sentenced to 9 months’ imprisonment. On or about September 15, 2008, LATIF was convicted upon a plea of guilty to Assault in the Third Degree: With Intent to Cause Physical Injury, a Class A misdemeanor in violation of New York Penal Law 120.00(1), Criminal Possession of a Controlled Substance in the Seventh Degree, a Class A

Misdemeanor in violation of New York Penal Law 220.03, and Petit Larceny, a Class A misdemeanor in violation of New York Penal Law 155.25, and sentenced to 4 months' imprisonment. On December 16, 2009, LATIF was convicted upon a plea of guilty to Attempted Criminal Sale of a Controlled Substance in the Third Degree, a Class C felony in violation of New York Penal Law 220.39(1), and sentenced to 54 months' imprisonment. On or about March 2, 2016, LATIF was convicted upon a plea of guilty to Attempted Criminal Sale of a Controlled Substance in the Third Degree, a Class C felony in violation of New York Penal Law 220.39(1) and sentenced to 4 years' imprisonment. LATIF is on parole until April 2019. Due to his felony drug trafficking convictions in 2009 and 2016, I am advised that LATIF qualifies as a Career Offender under the United States Sentencing Guidelines.

### III. THE SUBJECT PREMISES

6. SUBJECT PREMISES #1 is a single-family, two-story residence located on the southeast corner of N. 18<sup>th</sup> Street and Main Avenue in Wyandanch, NY. The front of the residence has red-colored brick siding on the first floor, beige-colored vinyl siding on the second floor, and brown-colored shutters. The south side of the residence has white-colored siding and a one car attached garage. There is a white-colored mailbox near the street and next to the driveway on the south side of the residence. The number "117" appear in gold-colored numbering on the front of the residence to the right of a brown-colored front door. The rear yard is contained by a white-colored vinyl fence. A photograph of SUBJECT PREMISES #1 is included in Attachment B to this Affidavit.

7. Upon information and belief, the defendant ISMAIL LATIF, also known as "Dot," has provided the address of SUBJECT PREMISES #1 as his permanent



residence. As stated more fully below, LATIF regularly sells narcotics out of SUBJECT PREMISES #1. Also a vehicle used by LATIF to conduct drug deals away from SUBJECT PREMISES #1 is registered to this address and is regularly parked in the driveway of SUBJECT PREMISES #1.

8. SUBJECT PREMISES #2 is a single-family, two-story residence located on the east side of Andrews Avenue in Wyandanch, NY. The front of the residence has beige-colored brick siding, a white-colored front door, and a light-colored front porch. There is a driveway on the north side of the residence. There is a small black-colored mailbox affixed to a chain link fence running across the front of the property near the street. There are no discernable address numbers posted anywhere on the residence. A photograph of SUBJECT PREMISES #2 is included in Attachment C to this Affidavit.

9. Upon information and belief, the defendant ISMAIL LATIF, also known as "Dot," has used SUBJECT PREMISES #2 as a base of operations for his drug trafficking. As explained more fully below, LATIF has sold narcotics out of SUBJECT PREMISES #2 to CS1 during this investigation and has been identified by other sources of information as a stash house location by LATIF to store and distribute narcotics.

10. SUBJECT PREMISES #3 is a single-family, two-story residence located on the west side of Diana Drive in Mastic Beach, NY. The front of the residence has white-colored vinyl siding with black-colored shutters. There is a one car attached garage on the south side of the residence. The number "184" appears vertically in black-colored numbering on a wooden mailbox post near the street in front of the residence. The rear yard is contained by a white-colored vinyl fence. A photograph of SUBJECT PREMISES #3 is included in Attachment D to this Affidavit.



11. Upon information and belief, the defendant ISMAIL LATIF, also known as “Dot,” has used SUBJECT PREMISES #3 as a secondary base of operations for his drug trafficking as explained more fully below. LATIF has provided this address to New York State Division of Parole as his residence. Also a vehicle used by LATIF to conduct drug deals away from SUBJECT PREMISES #3 is registered to this address in LATIF’s name and is regularly parked in the driveway of SUBJECT PREMISES #3.

IV. PROBABLE CAUSE TO ARREST THE DEFENDANT  
AND SEARCH THE SUBJECT PREMISES

12. On or about May 14, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as “Dot, to purchase fake<sup>2</sup> oxycodone pills and LATIF directed CS1 to meet at SUBJECT PREMISES #1. Prior to conducting the controlled purchase from LATIF at SUBJECT PREMISES #1, the Investigating Agencies searched CS1 and CS1’s vehicle for contraband and money with negative results and equipped CS1 with a recording device. Upon arriving at SUBJECT PREMISES #1, CS1 pulled into the driveway. LATIF exited SUBJECT PREMISES #1 and met CS1 in the driveway. LATIF then removed a plastic bag concealed in his underwear and “fronted” CS1 50 blue pills that appeared to be oxycodone and reentered SUBJECT PREMISES #1. Drug lab results of the pills obtained by CS1 indicate the presence of 2-furanylbenzyl fentanyl.

13. On or about May 17, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as “Dot,” in order to pay for the 50 pills provided by LATIF on May 14, 2018. LATIF directed CS1 to

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<sup>2</sup> CS1 was advised by LATIF that the pills contained fentanyl.

meet at SUBJECT PREMISES #2, where CS1, while wearing a recording device, was to pay LATIF \$600 for the previously “fronted” pills. LATIF then met CS1 in the street in front of SUBJECT PREMISES #2 and CS1 paid LATIF for the previously “fronted” pills.

14. On or about May 24, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as “Dot,” to purchase an additional quantity of pills. LATIF directed CS1 to meet at SUBJECT PREMISES #1. Prior to conducting the controlled purchase from LATIF at SUBJECT PREMISES #1, the Investigating Agencies searched CS1 and CS1’s vehicle for contraband and money with negative results and equipped CS1 with recording devices. Upon arriving at SUBJECT PREMISES #1, CS1 pulled into the driveway. LATIF exited SUBJECT PREMISES #1 and sold CS1 147 blue pills that appeared to be oxycodone and reentered SUBJECT PREMISES #1 with the \$1,800 in “buy” money provided by CS1. Drug lab results of the pills obtained by CS1 from LATIF indicate the presence of more than 15 grams of 2-furanylbenzyl fentanyl.

15. On or about June 25, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as “Dot,” to purchase an additional quantity of pills. Prior to conducting the controlled purchase from LATIF, the Investigating Agencies searched CS1 and CS1’s vehicle for contraband and money with negative results and equipped CS1 with a recording device. At a gas station just off of Exit 55 of the Long Island Expressway in Suffolk County, LATIF sold CS1 208 blue pills that appeared to be oxycodone for \$2,400. Drug lab results of the pills obtained by CS1 indicate the presence of more than 21 grams of 2-furanylbenzyl fentanyl.

16. On or about July 2, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as "Dot," to purchase an additional quantity of pills. LATIF directed CS1 to meet at SUBJECT PREMISES #2. Prior to conducting the controlled purchase from LATIF at SUBJECT PREMISES #2, the Investigating Agencies searched CS1 and CS1's vehicle for contraband and money with negative results and equipped CS1 with a recording device. Upon arriving at SUBJECT PREMISES #2, CS1 parked on the street in front of SUBJECT PREMISES #2. LATIF exited SUBJECT PREMISES #2, met CS2 in the driveway of SUBJECT PREMISES #2 and sold CS1 approximately 200 blue pills that appeared to be oxycodone and reentered SUBJECT PREMISES #2 with the \$2,400 in "buy" money provided by CS1.<sup>3</sup>

17. On or about July 9, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as "Dot," to purchase an additional quantity of pills. LATIF directed CS1 to meet at a CVS Pharmacy located in Deer Park, New York. Prior to conducting the controlled purchase from LATIF at the CVS Pharmacy, the Investigating Agencies searched CS1 and CS1's vehicle for contraband and money with negative results and equipped CS1 with a recording device. Surveillance conducted by the Investigating Agencies observed LATIF leave SUBJECT PREMISES #1 and meet with CS1 at the CVS Pharmacy. Inside the CVS Pharmacy,

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<sup>3</sup> Drug lab results for these pills are pending although the pills appear to be similar in size, shape and color to the previously purchased pills that tested positive for 2-furanylbzyl fentanyl.

LATIF sold CS1 approximately 200 blue pills that appeared to be oxycodone.<sup>4</sup> LATIF then returned to SUBJECT PREMISES #1 with the \$2,400 in “buy” money provided by CS1.

18. On or about July 17, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as “Dot,” to purchase an additional quantity of pills. LATIF directed CS1 to meet at a Mobil gas station located in Deer Park, New York. Prior to conducting the controlled purchase from LATIF at the Mobil gas station, the Investigating Agencies searched CS1 and CS1’s vehicle for contraband and money with negative results and equipped CS1 with a recording device. LATIF met with CS1 at the Mobil gas station and sold CS1 approximately 200 blue pills that appeared to be oxycodone<sup>5</sup> for \$2,400, although CS1 only provided LATIF with \$2,000 and indicated that CS1 would owe LATIF \$400. Later, surveillance by the Investigating Agencies observed LATIF return to SUBJECT PREMISES #2.

19. On or about July 24, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as “Dot,” to purchase an additional quantity of pills. In sum and substance, LATIF advised CS1 that he did not have the fake oxycodone pills for sale but that he could provide packaged heroin in lieu of pills and LATIF and CS1 met at SUBJECT PREMISES #2 to conduct the drug deal. Prior to conducting the controlled purchase from LATIF at SUBJECT PREMISES #2, the

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<sup>4</sup> Drug lab results for these pills are pending although the pills appear to be similar in size, shape and color to the previously purchased pills that tested positive for 2-furanylbzenzyl fentanyl.

<sup>5</sup> Drug lab results for these pills are pending although the pills appear to be similar in size, shape and color to the previously purchased pills that tested positive for 2-furanylbzenzyl fentanyl.

Investigating Agencies searched CS1 and CS1's vehicle for contraband and money with negative results and equipped CS1 with a recording device. LATIF and CS1 met in the driveway of SUBJECT PREMISES #2, LATIF gave CS1 numerous bundles<sup>6</sup> and plastic baggies containing suspected heroin<sup>7</sup> and CS1 gave LATIF \$2,800 in "buy" money, which included \$2,400 for the suspected heroin and the \$400 owed from the July 17, 2018 controlled purchase of pills from LATIF. LATIF then entered SUBJECT PREMISES #2 with the "buy" money.

20. On or about August 8, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as "Dot," to purchase an additional quantity of heroin. LATIF directed CS1 to meet at a commercial gym in Patchogue, New York. Surveillance by the Investigating Agencies of LATIF observed LATIF leave SUBJECT PREMISES #3 and followed LATIF to the commercial gym. Prior to conducting the controlled purchase from LATIF at the commercial gym, the Investigating Agencies searched CS1 and CS1's vehicle for contraband and money with negative results and equipped CS1 with recording devices. In the parking lot of the commercial gym, LATIF, who did not enter the gym before meeting with CS1, gave CS1 a black plastic bag that contained a clear plastic bag containing suspected heroin and CS1 gave LATIF \$1,250 in "buy" money.

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<sup>6</sup> Based on my training and experience, I know that a single dose of heroin is commonly packaged in a wax paper glassine bag and that ten glassine bags of heroin packaged for sale comprise a "bundle."

<sup>7</sup> Due to safety protocols, field tests of drugs that could potentially contain fentanyl or a fentanyl analogue are not conducted as inadvertent contact with such powerful opioid substances could cause overdose or death.

21. On or about August 21, 2018, CS1, acting at the direction of the Investigating Agencies, contacted the defendant ISMAIL LATIF, also known as "Dot," to purchase an additional quantity of heroin. LATIF directed CS1 to meet at SUBJECT PREMISES #2 to conduct the sale. Prior to conducting the controlled purchase from LATIF at SUBJECT PREMISES #2, the Investigating Agencies searched CS1 and CS1's vehicle for contraband and money with negative results and equipped CS1 with recording devices. Surveillance by the Investigating Agencies observed LATIF leave from SUBJECT PREMISES #1 and travel to SUBJECT PREMISES #2. CS1 then met LATIF in the driveway of SUBJECT PREMISES #2. LATIF gave CS1 a quantity of suspected heroin and CS1 gave LATIF \$1,250 in "buy" money. LATIF then drove from SUBJECT PREMISES #2 directly to SUBJECT PREMISES #1 and park his vehicle in the driveway.

22. In addition to the nine controlled purchases conducted by CS1, on or about August 13, 2018, the Investigating Agencies interviewed an individual ("CS2") who had overdosed on what CS2 believed to be heroin in July 2018. In sum and substance, CS2 stated that (a) CS2 had been purchasing heroin from the defendant ISMAIL LATIF for years, (b) in July 2018, CS2 contacted LATIF by phone to purchase heroin, (c) LATIF then sold CS2 several \$10 bags of suspected heroin in a gas station in Suffolk County, which CS2 ingested, (d) CS2 overdosed on the narcotics purchased from LATIF and had to be revived by medical professionals, (e) CS2 believed the heroin provided by LATIF contained fentanyl, and (f) LATIF had previously sold heroin out of SUBJECT PREMISES #2 to CS2 on numerous occasions. Phone records obtained by the Investigating Agencies corroborate CS2's numerous phone contacts with LATIF in the months leading up to the date of CS2's purchase, including multiple contacts the day of CS2's overdose.

23. In or about August 2018, the Investigating Agencies interviewed an individual ("CS3"), whose information has proved reliable and has been corroborated by other sources of information during this investigation, who had purchased heroin from the defendant ISMAIL LATIF, also known as "Dot," on multiple occasions over the past several years. In sum and substance, CS3 stated that LATIF was using SUBJECT PREMISES #3 as a stash house for his drug dealing operations and that LATIF had manufactured and/or packaged drugs for distribution out of that location. Additionally, CS3 stated that in July 2018, CS3 was inside SUBJECT PREMISES #2 and observed a firearm and drugs on a table in plain view. CS3 also stated that LATIF associates with an individual who CS3 described as LATIF's "muscle," who has access to SUBJECT PREMISES #3 and who, in the past, has participated in an armed home invasion robbery in the vicinity of SUBJECT PREMISES #1 and SUBJECT PREMISES #2.

24. During the course of the investigation, the Investigating Agencies have observed the defendant ISMAIL LATIF, also known as "Dot," take countermeasures to prevent detection of his drug dealing activities by law enforcement. For example, on several of the controlled purchases by CS1, LATIF changed the meet location multiple times before having CS1 arrive at one of the SUBJECT PREMISES.

25. In summary, the investigation has revealed that the defendant ISMAIL LATIF, also known as "Dot," has sold more than 10 grams of 2-furanylbenzyl fentanyl and other narcotic drugs and has used the SUBJECT PREMISES in furtherance of his drug trafficking operations.



V. EVIDENCE COMMONLY FOUND AT PREMISES  
USED BY DRUG TRAFFICKERS

26. Based on my training, experience, participation in other drug investigations, execution of search warrants, debriefing of confidential informants and extensive discussions with other experienced law enforcement officers, I am familiar with the typical distribution and trafficking methods used by drug dealers and traffickers, including the distribution of opioid narcotics such as oxycodone, heroin, fentanyl and fentanyl analogues.

27. In a substantial number of residential and commercial searches executed in connection with drug investigations, the following kinds of drug-related evidence have typically been recovered:

a. Drug traffickers often maintain close at hand records, including addresses, telephone and pager numbers of their criminal associates, including information pertaining to their sources of supply and customers, in address books, electronic organizers and on other media, physical or electronic;

b. Telephone bills and records of calls to telephones and pagers are also maintained for lengthy periods of time in defendants' homes. Such records constitute important corroborative evidence in drug conspiracy cases because the defendants call one another regularly, especially just before and after an incident involving an act in furtherance of the conspiracy;

c. Drug traffickers frequently maintain in their residences or stash locations quantities of controlled substances. They also maintain paraphernalia for paking

and distributing controlled substances, such as scales, plastic bags, heat-seal devices and other items;

d. Drug traffickers frequently maintain books, records, receipts, notes, ledgers and other documents relating to the ordering, sale, purchase and distribution of controlled substances. Such documents are generally maintained where the drug traffickers have ready access to them as in their residences and stash houses; and

e. Drug traffickers frequently maintain financial records evidencing the deposit and transfer of monies in their homes and stash houses. Such documents are generally maintained where the drug traffickers have ready access to them as in their residences and stash houses.

28. Based upon my training and experience, as well as my discussions with other law enforcement officers, I am aware that it is generally a common practice for drug traffickers to maintain in their residences and stash houses records relating to their drug trafficking activities. Because drug traffickers will “front,” that is, sell on consignment, controlled substances to their clients, or alternatively, will be “fronted” controlled substances for their suppliers, such record-keeping is necessary to detail amounts paid and owed, and such records will also be maintained close at hand so as to readily ascertain current balances. Often drug traffickers keep “pay and owe” records to show balances due for drugs sold in the past (“pay”) and for payments expected (“owe”) as to the trafficker’s supplier and the trafficker’s dealer(s). Additionally, drug traffickers must maintain telephone and address listings of clients and suppliers and keep them immediately available in order to efficiently conduct their trafficking business.

29. It is also a common practice for traffickers to conceal at their residences and stash houses both firearms and large quantities of United States currency, either the proceeds from drug sales or monies to be used to purchase controlled substances. In this connection, drug traffickers usually keep the firearm for protection and frequently make use of wire transfers, cashiers' checks, and money orders to pay for controlled substances. Evidence of such financial transactions and records relating to income and expenditures of money and wealth in connection with drug trafficking would also typically be maintained in residences and/or offices.

30. Further, I know, from both my professional and personal experiences, that people often maintain their cellular telephones in their residences.

31. Based upon my training and experience and participation in drug trafficking investigations, drug traffickers commonly conceal controlled substances, proceeds from the sale of controlled substances, and related records in closed or locked containers, including safes and other containers that may be further secured by key locks (or combination locks) of various kinds, in their residences and places of operation.

V. CONCLUSION

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant ISMAIL LATIF, also known as "Dot," so that he may be dealt with according to law.

WHEREFORE, your deponent also respectfully requests that search warrants be issued, pursuant to Rule 41 of the Federal Rules of Criminal Procedure, authorizing agents with the DEA, the New York State Police and Suffolk County Police Department and other law enforcement officers, to search SUBJECT PREMISES #1, SUBJECT PREMISES

#2 and SUBJECT PREMISES #3 therein and to seize the items described in Attachment A hereto, all of which constitute evidence, fruits and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846.

In addition, it is respectfully requested that the arrest warrant, the search warrants and this affidavit in support thereof be filed under seal until further order of the Court. The investigation into the activities of the defendant ISMAIL LATIF, also known as "Dot," is continuing. Premature disclosure of the contents of the arrest warrant, search warrants and this affidavit would seriously jeopardize the investigation, by notifying the target of the investigation of the existence of the investigation and afford him the opportunity to flee from prosecution, destroy or tamper with evidence, change patterns of behavior, intimidate or otherwise tamper with witnesses and notify any confederates.

In addition, it is respectfully requested that the Investigative Agencies, including the DEA, the New York State Police and the Suffolk County Police Department, be allowed to execute the search warrants of the SUBJECT PREMISES without giving notice of their authority and purpose in effecting the searches authorized under the search warrants. Such "no knock" authorization is appropriate because there is probable cause to believe that the SUBJECT PREMISES contain controlled substances that can be easily and quickly disposed of<sup>8</sup> and because the giving of such notice could endanger the life or safety of law enforcement officers executing the search warrants or other persons.<sup>9</sup>

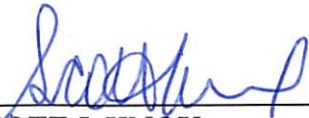
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<sup>8</sup> As explained above, the quantities of pills and suspected heroin distributed by LATIF could be easily flushed down a toilet, thrown out a window or ingested as the drugs are usually packaged for distribution in small plastic bags.

<sup>9</sup> As explained in more detail above, safety is a paramount concern given the (a) defendant's lengthy criminal history, which includes violent crimes, (b) the defendant's

As such, it is respectfully requested that Court issue the search warrants with the following language:

This Search Warrant authorizes the executing law enforcement officers, including the Drug Enforcement Agency, the New York State Police and the Suffolk County Police Department, to enter the SUBJECT PREMISES without giving notice of their authority and purpose because there is probable cause to believe that controlled substances and other evidence described in Attachment A may be easily and quickly destroyed or disposed of and that such notice may endanger the life and safety of officers and others.

  
\_\_\_\_\_  
SCOTT J. KNOX  
Special Agent  
Drug Enforcement Administration

Sworn to before me this

31 day of August, 2018

  
/S/ STEVEN I. LOCKE

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THE HONORABLE STEVEN I. LOCKE  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

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membership in a violent street gang, (c) prior observation of a firearm inside one of the SUBJECT PREMISES, (d) the defendant's use of suspected gang members as "look-outs" at SUBJECT PREMISES #2, and (e) the defendant's use of counter-surveillance measures to prevent detection by law enforcement. Furthermore, since the fentanyl analogues involved in this investigation are extremely powerful opioid narcotics, any attempt to dispose of such substances during the execution of the search warrants could severely jeopardize the health and welfare of both law enforcement officers and any others in the SUBJECT PREMISES.

ATTACHMENT A

(ITEMS TO BE SEIZED)

- (1) drugs, drug paraphernalia, scales, drug residue, diluents and materials related to distributing and/or manufacturing drugs;
- (2) books and records, showing cash transactions, prices and quantities of drugs bought and sold;
- (3) books and records showing the names, addresses and telephone numbers of purchasers and suppliers of drugs, as well as the identities of confederates in drug trafficking;
- (4) pagers, electronic organizers, cellular telephones and related bills and receipts;
- (5) motor vehicle records, telephone bills, property records showing ownership of assets purchased with drug proceeds;
- (6) currency used to purchase drugs, or reflecting proceeds of sales of drugs; and
- (7) banking and financial records, to include wire transfer receipts, bank deposit and withdrawal slips, and any other document evidencing a financial transaction that was conducted with proceeds;

all of which constitute evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846.

The items to be seized include any of the above items that are maintained withing other closed or locked containers, including safes and other containers that may be further secured by key lock (or combination locks) of various kinds.



ATTACHMENT B

SUBJECT PREMISES #1 is a single-family, two-story residence located on the southeast corner of N. 18<sup>th</sup> Street and Main Avenue in Wyandanch, NY. The front of the residence has red-colored brick siding on the first floor, beige-colored vinyl siding on the second floor, and brown-colored shutters. The south side of the residence has white-colored siding and a one car attached garage. There is a white-colored mailbox near the street and next to the driveway on the south side of the residence. The number "117" appear in gold-colored numbering on the front of the residence to the right of a brown-colored front door. The rear yard is contained by a white-colored vinyl fence.



SUBJECT PREMISES #1  
117 N. 18<sup>th</sup> Street, Wyandanch, NY 11798



ATTACHMENT C

SUBJECT PREMISES #2 is a single-family, two-story residence located on the east side of Andrews Avenue in Wyandanch, NY. The front of the residence has beige-colored brick siding, a white-colored front door, and a light-colored front porch. There is a driveway on the north side of the residence. There is a small black-colored mailbox affixed to a chain link fence running across the front of the property near the street. There are no discernable address numbers posted anywhere on the residence.



**SUBJECT PREMISES #2**  
**61 Andrews Avenue, Wyandanch, NY 11798**

ATTACHMENT D

SUBJECT PREMISES #3 is a single-family, two-story residence located on the west side of Diana Drive in Mastic Beach, NY. The front of the residence has white-colored vinyl siding with black-colored shutters. There is a one car attached garage on the south side of the residence. The number "184" appears vertically in black-colored numbering on a wooden mailbox post near the street in front of the residence. The rear yard is contained by a white-colored vinyl fence.



SUBJECT PREMISES #3  
184 Diana Drive, Mastic Beach, NY 11951



TO: Clerk's Office

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORKFILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ AUG 31 2018 ★

APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

LONG ISLAND OFFICE

\*\*\*\*\*

MJ - 18 815

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: \_\_\_\_\_

Judge/Magistrate Judge: \_\_\_\_\_

Date Entered: \_\_\_\_\_

-V.-

Docket Number \_\_\_\_\_

\*\*\*\*\*

SUBMITTED BY: Plaintiff \_\_\_\_\_ Defendant \_\_\_\_\_ DOJ ☒

Name: CHARLES ROSE

Firm Name: US ATTORNEY'S OFFICE

Address: 610 FEDERAL PLAZA  
CENTRAL ISLIP, NY 11722

Phone Number: 631-715-7844

E-Mail Address: charles.rose@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES \_\_\_\_\_ NO \_\_\_\_\_

If yes, state description of document to be entered on docket sheet:

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under sealORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.

DATED: OCT 1 2018

/S/ STEVEN I. LOCKE

U.S. DISTRICT JUDGE/U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_

DATE

**MANDATORY CERTIFICATION OF SERVICE:**

A.) \_\_\_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.) \_\_\_\_\_ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

8/31/18  
DATE

SIGNATURE