

AO 106 (Rev. 04/10) Application for a Search Warrant

FILED ENTERED
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APR 20 2015

for the
Western District of Washington

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY _____ DEPUTY
for the Search of
(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.



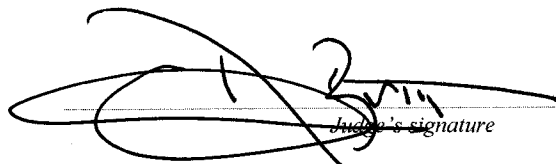
Applicant's signature

Brandon James, Task Force Officer FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/20/2015



Judge's signature

City and state: Seattle, Washington

Dean Brett, United States Magistrate Judge

Printed name and title

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 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

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

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

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

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

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

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

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

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.