

Exhibit D

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

IN THE MATTER OF THE SEARCH OF
1830 LISBON STREET, LEWISTON,
MAINE

No. 2:18-mj-57-JHR

IN THE MATTER OF THE SEARCH OF
230 MERROW ROAD, AUBURN, MAINE

No. 2:18-mj-58-JHR

IN THE MATTER OF THE SEARCH OF
249 MERROW ROAD, AUBURN, MAINE

No. 2:18-mj-59-JHR

IN THE MATTER OF THE SEARCH OF 17
BRIDGE STREET, LEWISTON, MAINE

No. 2:18-mj-60-JHR

IN THE MATTER OF THE SEARCH OF 29
AVON STREET, LEWISTON, MAINE

No. 2:18-mj-61-JHR

IN THE MATTER OF THE SEARCH OF 97
4TH STREET, AUBURN, MAINE

No. 2:18-mj-62-JHR

IN THE MATTER OF THE SEARCH OF
555 LINCOLN STREET, LEWISTON,
MAINE

No. 2:18-mj-63-JHR

IN THE MATTER OF THE SEARCH OF
1315 SABATTUS STREET, LEWISTON,
MAINE

No. 2:18-mj-64-JHR

IN THE MATTER OF THE SEARCH OF 57
FAIR STREET, LEWISTON MAINE

No. 2:18-mj-65-JHR

IN THE MATTER OF THE SEARCH OF 72
DANVILLE CORNER ROAD, AUBURN,
MAINE

No. 2:18-mj-66-JHR

IN THE MATTER OF THE SEARCH OF 25
COYOTE LANE, GREENE, MAINE

No. 2:18-mj-67-JHR

IN THE MATTER OF THE SEARCH OF
354 BEECH HILL ROAD, AUBURN,
MAINE

No. 2:18-mj-68-JHR

IN THE MATTER OF THE SEARCH OF
1870 HOTEL ROAD, AUBURN, MAINE

No. 2:18-mj-69-JHR

IN THE MATTER OF THE SEARCH OF
380 OLD GREENE ROAD, LEWISTON,
MAINE

No. 2:18-mj-70-JHR

IN THE MATTER OF THE SEIZURE OF A
BLUE 2016 LAMBORGHINI HURACA
ASSIGNED VIN NUMBER
ZHWUC2ZF3GLA05059 AND MAINE
REGISTRATION STARBOY

No. 2:18-mj-71-JHR

IN THE MATTER OF THE SEIZURE OF A
BLACK 2014 NISSAN GT-R ASSIGNED
VIN NUMBER JN1AR5EF9EM271324
AND MAINE REGISTRATION EVILR

No. 2:18-mj-72-JHR

**AFFIDAVIT IN SUPPORT OF
APPLICATIONS FOR SEARCH AND SEIZURE WARRANTS**

I, Barry Kelly, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the Drug Enforcement Administration (DEA), United States Department of Justice, with federal law enforcement jurisdiction, and have been in this position since January 2014. I also served as a DEA Task Force Officer from 2002 to 2006. I have approximately 26 years of law enforcement experience. In the course of my law enforcement training and experience, I have had an opportunity to search for, seize, and personally observe what I have recognized to be and what was later confirmed by drug analysis to be scheduled drugs, including but not limited to heroin, cocaine, marijuana (both dried and growing), crack cocaine, and various narcotics lawfully available only by prescription. I have conducted or participated in, among other things, surveillance, undercover transactions, debriefings of informants and confidential sources, and reviews of taped conversations relating to narcotics trafficking. I have assisted in a large number of other investigations. I have drafted a number of drug related search and arrest warrants and have assisted in the execution of numerous search and arrest warrants in which controlled substances, drug paraphernalia, and other contraband were found. Through my training and experience, I have become familiar with the habits, methods, routines, practices and procedures commonly employed by persons engaged in the trafficking of illegal drugs.

2. Based on my training and experience, I am aware that drug traffickers commonly use cellular telephones in furtherance of their drug trafficking activities and frequently change cellular telephone numbers and cellular telephones in an effort to thwart law enforcement's use

of electronic surveillance. I am also aware that drug traffickers often speak in vague, guarded, or coded language when discussing their illegal business in an effort to further prevent detection.

3. The facts in this affidavit come from my personal observations, my training and experience, phone analysis, information obtained by search warrant, Title III wire interceptions, and information obtained from other agents and witnesses.

PURPOSE OF AFFIDAVIT AND LOCATIONS TO BE SEARCHED

4. The purpose of this Affidavit is to set forth facts for the Court to determine whether sufficient probable cause exists in support of my applications for search and seizure warrants pursuant to Rule 41 of the Federal Rules of Criminal Procedure authorizing the search for and seizure of evidence of the crimes of:

- a. manufacturing a controlled substance in violation of 21 U.S.C. § 841;
- b. conspiracy to possess with intent to distribute, and to distribute, controlled substances including, but not limited to, marijuana, in violation of 21 U.S.C. § 846;
- c. possession with intent to distribute and distribution of controlled substances including, but not limited to, marijuana, in violation of 21 U.S.C. § 841(a)(1);
- d. money laundering, in violation of 18 U.S.C. §§ 1956 and 1957;

from the locations set forth in Attachments A-1 – A-14 as well as for the seizure of two vehicles described in the respective seizure warrant applications.

ITEMS TO BE SEIZED

See attachments B-1, B-2, and descriptions of two vehicles to be seized contained within the respective applications.

I have probable cause to believe and do in fact believe that a search of the locations set forth in Attachments A-1 – A-14 will result in the seizure of the "Items to be Seized,"

(attachments B-1 and B-2) and that said items constitute evidence, fruits and instrumentalities of violations of crimes set forth above. As to the requested seizure warrants for vehicles, I have probable cause to believe and do in fact believe that the property is forfeitable as proceeds of felony drug trafficking, as property that facilitated felony drug trafficking, or property involved in money laundering.

FACTS SUPPORTING PROBABLE CAUSE

Overview of the Investigation and Background of Locations to be Searched

5. This investigation has been ongoing since 2016 and is now a joint Organized Crime and Drug Enforcement Task Force (“OCDETF”) investigation being conducted by the DEA, Internal Revenue Service, and other law enforcement agencies. Based on the investigation to date, I believe that this drug organization grows and distributes hundreds of pounds of marijuana per month under the cover of Maine’s Medical Marijuana program. However, I believe this organization distributes to people who are not participants in Maine’s Medical Marijuana program, to include customers from outside of the State of Maine. I also believe this organization grows marijuana as a precursor for the illegal manufacture of marijuana concentrate. I also believe this organization is engaged in the laundering of illegally derived income.

6. Since 2015, law enforcement has received significant information about members of this organization. Multiple sources describe the vast amounts of money generated by this organization under the supposed cover of Maine’s Medical Marijuana program.

7. I also believe based on wire interceptions, surveillance, and information from cooperating sources, that members of this organization operate properties in the names of third parties, recruit people to serve as caregivers to give the marijuana grows the cover of legitimacy

under Maine's Medical Marijuana program, and title assets in the names of third parties and business corporations to conceal the true owner of criminally derived assets.

8. As described below, I believe this organization operates marijuana grows at numerous locations in Androscoggin County to include 1830 Lisbon Street, Lewiston; 249 Merrow Road, Auburn; 17 Bridge Street, Lewiston; 29 Avon Street, Lewiston; 97 4th Street, Auburn; 555 Lincoln Street, Lewiston, and 1315 Sabattus Street, Lewiston.

9. Timmy Bellmore is the leader of this organization and is responsible for the overall management of the marijuana cultivation and distribution. Bellmore is the user of telephone number (207) 577-5296 ("Target Telephone 2" or "TT2"). He resides at 57 Fair Street, Lewiston, Maine. In 2004, Bellmore was convicted in the United States District Court for the District of Maine of conspiracy to distribute and possess with intent to distribute 100 kilograms or more of marijuana. He was sentenced to 60 months in prison. This is a "disqualifying drug offense" for purposes of his participation in Maine's Medical Marijuana program.¹

10. Through my direct involvement in this investigation, I believe that Richard Daniels is one of Bellmore's primary distributors. Daniels receives bulk quantities of marijuana from Bellmore and others to distribute and to process into marijuana concentrate. Daniels

¹ 22 M.R.S.A. § 2422 provides that "A person who is a primary caregiver must be at least 21 years of age and may not have been convicted of a disqualifying drug offense." This section defines a "disqualifying drug offense" as a conviction for a violation of a state or federal controlled substance law that is a crime punishable by imprisonment for one year or more. It does not include:

A. An offense for which the sentence, including any term of probation, incarceration or supervised release, was completed 10 or more years earlier; or

B. An offense that consisted of conduct that would have been permitted under this chapter.

manufactures marijuana concentrate (also known as “Dabs” or “Slabs” or “Butane Hash Oil”)² at his residence and detached garage located at 1302/1310 Sabattus Street, Lewiston, Maine.³

Daniels distributes marijuana, marijuana concentrate, and other controlled substances to people from inside and outside of Maine. Daniels has also been convicted of a “disqualifying drug offense” for purposes of his participation in Maine’s Medical Marijuana program. During the course of this investigation, law enforcement purchased marijuana, marijuana concentrate, LSD, and psilocybin mushrooms from Daniels.

11. Brian Bilodeau is Bellmore’s former partner. Bilodeau resides at 72 Danville Corner Road, Auburn, Maine. As described below, I believe Bilodeau now works with Kevin Dean and others and is involved in an ongoing marijuana grow at 230 Merrow Road, Auburn. I believe Bilodeau generated substantial sums of money from his involvement in the Bellmore organization (and his continued involvement in marijuana cultivation) and purchased assets to include a 2016 Lamborghini and a 2014 Nissan GT-R.

12. Timothy Veilleux is one of Bellmore’s current business partners. He resides at 354 Beech Hill Road, Auburn, Maine. Veilleux’s criminal history includes a 1991 conviction in

² Butane Hash Oil is made by extracting THC from marijuana through the use of butane, a solvent. Butane Hash Oil contains a much higher concentration of THC than marijuana does. To extract THC from marijuana, manufacturers drip butane through a column or tube containing marijuana plant material that is then collected in a vessel. As the butane drips through the plant materials, it extracts the THC. The substance or oil that collects in a vessel at the bottom of the tube is typically heated to hasten the evaporation of the butane from the oil. A vacuum oven is often used to further evaporate the butane from the butane hash oil. Butane is highly flammable. At various stages during the manufacturing process, butane escapes into the air. Butane is heavier than air and tends to collect at ground level. When butane reaches a certain concentration in the air, it can ignite when exposed to a heat source.

³ 1302 Sabattus Street and 1310 Sabattus Street are across a common driveway from one another. Based on the investigation to date (to include extensive surveillance activities), I believe that Daniels has access to both locations. For practical purposes, 1310 Sabattus Street is a detached garage associated with 1302 Sabattus Street even though the City of Lewiston assigned the buildings different street numbers. (Both are owned by the same LLC.) In this affidavit, I collectively refer to these properties as 1302/1310 Sabattus Street.

this Court for conspiracy to distribute cocaine for which he was sentenced to 100 months in prison and four years of supervised release.

13. Danny Bellmore is Timmy Bellmore's brother.⁴ He resides at 25 Coyote Lane, Greene, Maine. I believe Danny Bellmore is a long-time member of this organization who currently works at the marijuana grow at 230 Merrow Road but also continues to work with Timmy Bellmore.

14. Mark Kilpatrick holds a management level position within this organization. The investigation reveals he collects money on behalf of Bellmore. I believe he also maintains a marijuana grow at his residence located at 1870 Hotel Road, Auburn, Maine.

15. Greg Pelletier manages the marijuana grow at 17 Bridge Street on behalf of this organization. Pelletier resides at 380 Old Greene Road, Lewiston, Maine. I believe Pelletier holds a management level position within this organization.

Background Information from SOI-5

16. Source of Information 5 ("SOI-5") admitted to significant personal involvement in the Timmy Bellmore drug organization. SOI-5 stated that he/she personally installed several of the marijuana grows under the control of Bellmore's drug organization. SOI-5 indicated that he/she was supposed to be paid a percentage of the proceeds from the harvests. In the summer of 2017, SOI-5 demanded his/her share from Bellmore, which SOI-5 estimated was \$3,000,000. After Bellmore refused to pay, SOI-5 left the organization under adverse terms. SOI-5 therefore

⁴ In this affidavit, I refer to Danny Bellmore as "Danny Bellmore." Any references to just the last name "Bellmore" refer to Timmy Bellmore.

has significant first-hand information up until the summer of 2017.⁵ SOI-5 clearly has a bias against the Bellmore drug organization. Nonetheless, the portions of his information that have been able to be corroborated are consistent with other government intelligence.

17. SOI-5 provided the following information about the Bellmore drug organization (in summary and in part):

- a. The Bellmore organization started in the winter of 2012 after Bellmore's car business started to falter.
- b. SOI-5 initially installed an 18 plant marijuana grow in Bellmore's house.
- c. This marijuana grow was under the name of a marijuana caregiver.
- d. Bellmore had other people acquire caregiver licenses to tend to a 36 plant marijuana grow on Sabattus Street (believed by agents to be at Independent Auto's overflow lot located at 1315 Sabattus Street Lewiston, Maine).
- e. Bellmore and Brian Bilodeau were partners through the period that SOI-5 remained with the organization.⁶

⁵ SOI-5 came to the attention of law enforcement after another source of information told agents that SOI-5 had a falling out with Bellmore and might be willing to speak with agents. For about two weeks, agents waited for the other source of information to arrange this meeting. Agents never heard from this source of information. A local law enforcement officer then left a business card at a location frequented by SOI-5 and asked that SOI-5 contact him. SOI-5 did so in early February 2018. SOI-5 has a criminal history including a charge of reckless conduct that was filed without costs more than ten years ago.

⁶ I believe that Bellmore and Bilodeau have now split. I believe based on wire interceptions that Bilodeau continues to cultivate and distribute marijuana. Bilodeau appears to have an interest in the "Cascades Factory," which I know is attempting to become a registered marijuana dispensary in the State of Maine. As outlined below, I believe that Bilodeau has generated substantial income from unlawful marijuana trafficking and continues to be involved in unlawful marijuana trafficking.

- f. Bilodeau was responsible for altering the books and records of Bellmore's car lots to account for marijuana income.
- g. In the summer of 2014, this organization installed a 72 plant marijuana grow at 230 Merrow Road in Auburn.
- h. Bellmore contracted with Terry Buck of T. Buck Construction to acquire property at 249 Merrow Road in Auburn. SOI-5 subsequently installed a 72 plant marijuana grow at that location.
- i. Buck was supposed to receive a percentage of the crop yields from this location.
- j. Bellmore sells marijuana for \$1800 per pound within the State of Maine and for \$4000 per pound to customers outside the State of Maine.
- k. SOI-5 estimated that about 25 percent of the marijuana is sold in Maine and the rest is shipped out of state.
- l. Bellmore's primary customers from outside of Maine are in New Jersey and Florida.
- m. A male named Johnny Rodriguez is a significant customer from New Jersey.
- n. SOI-5 last saw Rodriguez in the fall of 2015.
- o. SOI-5 is aware that Rodriguez traded Bellmore a white Ferrari for 60 pounds of marijuana.
- p. Bellmore has a customer in Florida named Richard.
- q. To get bulk marijuana out of Maine, Bellmore loads it in cars with dealer plates or puts it in cars on a car carrier.
- r. SOI-5 estimated that between 2013 and the time of SOI-5's separation, Bellmore sold about 4,000 pounds of marijuana per year. (SOI-5 later increased this estimate to 5,000 pounds per year).

- s. Last summer, SOI-5 assisted with the installation of four grow rooms totaling 72 plants at Euro Motors.
- t. SOI-5 is aware that Timmy Bellmore has a gun safe at his residence (as of the time of SOI-5's separation from the organization) that SOI-5 suspects contains large amounts of money.
- u. Tim Veilleux is an investor in this organization who gets a percentage of the crops.
- v. Veilleux has cars on a lot at Euro Motors that he tries to sell. Inside Euro Motors are six classic cars belonging to Bellmore. SOI-5 observed these cars last summer.
- w. Greg Pelletier runs a marijuana grow behind the hospital (agents believe this is at 17 Bridge Street).
- x. Brandon Kyjohnian has a marijuana grow at 2 Crowley Road (agents believe this is the Grange Hall Building).
- y. Matt Fournier bought a building on Temple Street with the intent that Bellmore would use it to grow marijuana.
- z. Mark Kilpatrick has an indoor grow at end of Poland Road that is financed by Bellmore.
- aa. Bellmore has an account at Maine Family Credit Union under the name of TMB Auto.
- bb. In 2013 and 2014, SOI-5 deposited cash in to this account at Bellmore's direction approximately three times per week for 18 months.
- cc. Bellmore would hand SOI-5 between \$5,000 and \$20,000 and direct SOI-5 to deposit the money.
- dd. Bellmore told SOI-5 not to deposit more than \$9999 to avoid triggering scrutiny.
- ee. Brian Bilodeau has a safe on first floor of his house.

- ff. Bellmore and Bilodeau told SOI-5 that George Schott is an original investor in this operation.

Other Confidential Sources

18. Information from other Confidential Sources of Information ("SOI") and a Cooperating Defendant ("CD") is included throughout this affidavit. The background of each source and his/her basis of knowledge is set forth below:

- a. CS-1 provided information to law enforcement beginning in the spring of 2015. CS-1 was a paid informant. He/she has completed successful controlled purchases of drugs from targets of other investigations. He/she is known to be a former drug trafficker with a criminal history including convictions for drug trafficking, unauthorized use of a vehicle, and criminal possession of controlled substances. CS-1 has no known pending charges. CS-1 has been deactivated and has not provided recent information. The historical information provided by CS-1 has proven credible and consistent with other government intelligence and has been independently corroborated.
- b. SOI-1 provided information to a law enforcement officer because he/she is personally familiar with the officer and wanted to assist. SOI-1 is not a formal cooperating source with a law enforcement agency. SOI-1 is involved with used car sales in the Lewiston area and knows Bellmore through this business. SOI-1 has a criminal history including a conviction for allowing a minor to consume alcohol. Agents believe SOI-1 to be reliable.
- c. SOI-2 has provided information to law enforcement since September 2017. SOI-2 used to work with this drug trafficking organization. However, the organization found a replacement for SOI-2. Because of personal animosity towards Bellmore, SOI-2 decided to provide information to law enforcement. SOI-2 has not previously worked as a

confidential source for DEA. SOI-2 is not a formal cooperating source and told agents that he/she is unwilling to sign an informant agreement and is unwilling to testify. SOI-2 has a criminal history including a 1994 conviction for unlawful trafficking in scheduled drugs. Agents believe SOI-2's information to be credible and consistent with other government intelligence.

- d. SOI-3 began providing information to law enforcement in 2017. SOI-3 has no pending charges. He/she is cooperating because he/she claims to be afraid of Bellmore and other members of his organization and desires to see Bellmore prosecuted. SOI-3 does not want to enroll as a cooperating source and does not wish to testify. Based on information received from SOI-3, investigators believe that SOI-3 has engaged in real estate transactions with members of this organization that have enriched SOI-3. It is reasonable to conclude that SOI-3 knew he/she was paid with criminally derived funds. Although no promises have been made to SOI-3, he/she may reasonably expect not to be prosecuted based upon the information he/she has provided to date. Investigators believe that SOI-3 at times minimizes his/her knowledge and/or involvement in facilitating the laundering of drug proceeds. Otherwise, agents believe SOI-3 to be reliable.
- e. In late August 2017, agents interviewed SOI-4. SOI-4 has not previously been an informant. He/she provided information in part because he/she believed Andrew Waite's activities were legal. SOI-4 has a 1984 arrest for receiving stolen property that was dismissed.
- f. Cooperating Defendant 1 ("CD-1") cooperated with a federal agency. CD-1 has also been paid for his/her cooperation. CD-1 approached law enforcement about cooperation in hopes of receiving consideration for pending criminal charges. It is reasonable to

* Waite's activities are described in another exhibit. BK

believe that CD-1 expects to receive consideration for the information provided to date. CD-1 has also cooperated with another federal investigation and provided active cooperation to include controlled purchases of narcotics. Agents believe CD-1's information to be credible. However, I believe CD-1 is engaging in criminal activity with Daniels and other drug traffickers without agents' knowledge or permission. Therefore, I have concerns about CD-1's reliability and trustworthiness. I also believe based upon CD-1's appearance and his/her admissions that he/she has used marijuana concentrate in Daniels's presence during controlled transactions and obtained marijuana "clones." This is in violation of CD-1's cooperation agreement. CD-1 has been admonished about his/her use of controlled substances while serving as a cooperator. However, CD-1 has not yet been terminated due to this misconduct as doing so has the potential to compromise this investigation and the other ongoing federal investigation. Recently, CD-1 volunteered information about a separate marijuana grow operation and placed a recorded call at the direction of agents. CD-1 has convictions for burglary, burglary of a motor vehicle, violating probation, criminal threatening, driving offenses, and thefts. No promises have been made to CD-1.

Authorization of Wire Interceptions

19. On January 24, 2018, United States District Judge Jon D. Levy authorized the interception of wire and electronic communications occurring over telephone number (207) 891-9579 ("Target Telephone 1" or "TT1"). TT1 is used by Richard Daniels. Interceptions over TT1 ended on February 23, 2018.

20. On February 8, 2018, United States District Judge Jon D. Levy authorized the interception of wire and electronic communications occurring over telephone number (207) 577-

5296 ("Target Telephone 2" or "TT2"). TT2 is used by Timmy Bellmore. Interceptions over TT2 are ongoing pursuant to this authorization.

Bellmore Organization Supplies Richard Daniels

21. I believe Richard Daniels is one of the primary Maine-based distributors for the Bellmore drug organization. Below are examples of the drug relationship between the two men.

22. On January 26, 2018, at 10:56 a.m., agents intercepted an incoming call to TT1 from TT2 (session 49). During this call, the following exchange occurred between Bellmore ("TB") and Daniels ("RD"):

RD: How's it going?

TB: How's it shakin'?

RD: Yeah. It's shakin' pretty good.

TB: Did that help at all?

RD: Absolutely.....Absolutely, I'll see you, I can see you in a little bit if you want.

TB: Right, yeah, I'm just trying to, we, we're trimming Monday so I'm just trying to clear...

RD: Well I'll help you clear some out.

TB: Yeah that's what I'm trying to do (U/I).

RD: You got it, I gotta go upstairs and count. Did you ahh. When did you wanna ... When did you wanna see me?

TB: Doesn't matter. I gotta water a build... you know I'm a fucking idiot. You'd think at this point I wouldn't have to fucking do nothing but I fucking took over another small building.

RD: Yeah.

TB: Fuckin....I don't have any help.

RD: Jesus Christ. (Laughing) It's all fucked up.

TB: Well, I couldn't give it up you know what I mean? It was a, it's a four, it's a small strong type grow building, but it was turn-key.

RD: Yeah.

TB: It was one of Matt's.

RD: Yeah.

TB: So I walk in. Five grand a month., Turn-key fucking, it's not gonna do what we do, you know? Small, but I wanna do all my "Blue Power," my "Blue Widows," and my fucking, You know -- the stuff that doesn't necessarily grow big but always have it.

RD: Right.

TB: I put 42 plants in there. They probably be two pounders.

RD: (Laughing) There you go!

TB: But I'll grow like "Blue Widow," This time I got "Red Diesel," "Blue Widow." But I got like "Bubba," I got the "Sour Patch Kiss," The "Bubba" whatever the fuck it's called, "Bubba's Gift."

RD: (Laughing) "Yeah."

TB: "Midnight Oil," couple of those, a bunch of "Blue Sky," bunch of "Blue Widow," bunch of "Big Smooth."

RD: Yeah it's going really good. It's heating right up actually. I haven't, I haven't straightened things out yet. I haven't, you know, because I was uhh, I just got back from Orono at like one in the morning last night.

TB: Yup.

RD: Yeah. Things are going really well!

TB: Yeah, Everybody's happy with the.....

RD: "Oh yes! Oh Yes! Ohh, well not everybody happy -- other fucking ahh... Other people are like, "What the fuck?" It's like "ahh too bad."

TB: What do you mean?

RD: Ahh, No other people are like, "Hey man you fucking -- that's cheap." I'm like, "Yeah, there you go!"(Laughing) I go, "I told you it would happen!" (Laughing)

TB: Oh your guys up over, that ones that were growing, yeah.

RD: Yeah, everybody's like, "yeah." Everybody's like "ohhhh," you know what I mean? It's like, "Oh well. Too fucking bad. This was (U/I)" you know? You couldn't see it coming. I been doing this for five years and every year, every year it goes down, it started out at 33... (Laughing)

TB: Yeah but this is the thing, this is the thing Stitch⁷... We will go up if we have to.

RD: Oh, I know that. Uhhh...

TB: Ok. We have, we can control things as much as we want. Right now why sit on -- why fucking hold it for \$100.00, you know? Brian, I have a hard time with Brian all the time because this is the thing -- the longer it sits around, the less quality, we don't have time.

RD: Right.

TB: Be different..... It would be different if Brian had somebody sitting there burping and churing and blah, blah, blah.... But.

RD: I'm in the moving business, not the storage business.

(Both Laughing)

⁷ I know "Stitch" to be Daniels's nickname.

TB: That's what I'm saying. So, the longer it sits around, you know without fucking curing it and doing your thing every day the fucking, the less, you know the lesser it gets.

RD: Yeah, oh yeah.

TB: So I would rather lose a little bit of money today, pay the bills and not be uncomfortable and then if we have to... We'll fucking shuck and jive in the..... you know, fucking.

RD: Absolutely, absolutely.

23. I believe this portion of the call is drug related. Specifically, I believe the following:

- a. Daniels indicated he could see Bellmore soon.
- b. Bellmore indicated his organization was trimming marijuana plants on Monday and was trying to clear out other marijuana.
- c. Daniels indicated he could take some.
- d. Daniels indicated he needed to count his money.
- e. Bellmore described taking over another small building that was set up for marijuana cultivation and cost him \$5,000 per month.
- f. Bellmore described the strains of marijuana he intended to grow and indicated he put 42 plants in the building that would produce two pounds of marijuana per harvest
- g. Daniels indicated business was good and described returning from Orono the prior night.
- h. Daniels and Bellmore discussed the price of marijuana and how they keep the price low to harm competition but could go up in price if needed.
- i. Daniels and Bellmore discussed "Brian" (believed to be Brian Bilodeau) holding marijuana for an extra \$100 per pound when doing so reduces the quality.

j. Daniels indicated he was in the business of selling marijuana and not storing it.

24. Session 49 continued between Bellmore ("TB") and Daniels ("RD") as follows:

TB: You know... but listen... we're gonna be working with...

RD: Huh?

TB: You know, we're gonna be working with over 50 to 70 strains, probably 20/30 that are strong all the way... gonna be in rooms all the time. You can't beat "Blue Diesel."

[Pause] You can't beat "Purple Train Wreck."

RD: Can't beat "Super Silver," umm... [Voices overlaps]

TB: You can't beat "Incredible Bulk."

RD: Nope.

TB: I just got a cut of "Do-si-do."

RD: What's in that? Umm, oh, really?

TB: Yup.

RD: "Do-si-do."

TB: Now, I gotta get a cut of that "Tangleope," you can't beat, I don't think you can beat the "Big Smooth" right now. I think the "Quantum" and the fucking, umm, "Gummy Bear" are gonna be [Pause] hard to beat.

RD: The "Gummy Bear" right now -- I need as much of that as possible. It works just like the "Super Silver" so...

TB: Right. The truth, I think the "Truth Band's" hard to beat, isn't?

RD: I don't know. I haven't really gotten into big... the last time it was purple and everybody

was freaking. Umm, but I haven't gotten any big things, I haven't used it yet, I haven't blast them. Once I blast something, like the "Golden Strawberries," umm, you gonna be so proud of that, (U/I) all the time.

TB: I got "Comatose" coming down, umm, something "Cookies." I got...

RD: I gotta...

TB: Some "Blue Widows,"

RD: I can have four more different ones for you by Monday.

TB: Okay.

RD: Yup. And I'm gonna go get that table. On Monday (U/I) text to me, sometime tonight or tomorrow night just because I'm going over there. Once I get that table, that means I'm starting the new ones.

TB: If I don't, If I don't do anything, I'm gonna be at 280.

RD: Jesus Christ. I am ...

TB: Flowering.

RD: [Laughs] Getting ready for the summer.

TB: So... Well, what I'm saying is, I'm almost, I think I'm going to stop.

[Call Waiting beep]

RD: Umm, if you do, I mean, it's like, I don't know. (U/I) give you on that because, I mean, you know better than I do but, I'm wondering if we're just all of a sudden gonna have a fucking crazy year.

TB: Well, I mean, you know how that goes. We're a little greedy so... I have a, I have a room right now. [Pause] I'm kicking out young guns and I'm gonna put a lab in there, but I might do one more, I might do one more big room but, umm, switch it to 216's so... I

just, I have a hard time with trimming. I got so much shit going on, my trimming schedule is pretty much, umm...

RD: Fucked?

TB: Right. I rather do two-day trims. I can do two-day trims. I can take people out of my, my rooms and have them trim. When it's a fucking four or five day trim, it fucks up everything.

RD: Yeah, yeah 'cause [Voice overlap]

TB: I lose, I lose four or five days. I can take people... I can do a room. If I, if I can do 16 pla... I can do 100 pound room in two days.

RD: Really?

TB: Two and a half days, yeah. So, anything more than that's four, 'cause all of the (U/I) and stuff.

25. I believe this portion of the call is drug related. Specifically, I believe the following:

- a. Daniels and Bellmore described the strains of marijuana available.
- b. Daniels discussed "Blasting" (believed to be the process of making marijuana concentrate) from various strains of marijuana.
- c. Bellmore indicated he currently had 280 flowering marijuana plants.
- d. Bellmore complained about the trimming schedule.
- e. Bellmore indicated he could harvest and process a 100-pound room in two days.

26. On January 26, 2018, agents intercepted the following text messages between TT1 (used by Daniels) and TT2 (used by Bellmore):

Session	Date	Time	Sending Number	Receiving Number	Content
57	1/26/18	4:12 p.m.	TT2	TT1	You around
58	1/26/18	4:13 p.m.	TT1	TT2	Absolutely
59	1/26/18	4:14 p.m.	TT1	TT2	Do you want me to head over there
60	1/26/18	4:14 p.m.	TT2	TT1	Lol..ok
61	1/26/18	4:16 p.m.	TT1	TT2	I can leave in 10 minutes
62	1/26/18	4:17 p.m.	TT2	TT1	Mark want be back till 6...i will run over

27. I believe these text messages are drug related. Specifically, I believe the following:

- a. Bellmore asked Daniels if he was around.
- b. Daniels answered in the affirmative and asked if he should meet Belmore.
- c. Bellmore answered in the affirmative.
- d. Daniels stated he could leave in ten minutes.
- e. Bellmore then indicated that "Mark" (believed to be Mark Kilpatrick) would not be back until 6:00 p.m. and Bellmore would then come over to meet Daniels.

28. On January 26, 2018, at 4:17 p.m., agents intercepted an incoming call from TT2 to TT1 (session 63). This call immediately followed the above text message exchange. During this call, the following exchange occurred between Bellmore ("TB") and Daniels ("RD"):

TB: Hello.

RD: Hey.

TB: Yeah, Markey is gonna pick up my truck so he probably won't be back but -- till six. At the shop. So I was gonna go grab that and have you meet him after six.

RD: Yup. Sounds good to me.

TB: So I'll probably be like, give me twenty minutes. I'll be over your house.

RD: Alright, cool.

TB: So, yo, yeah he went to go get my truck in Windham. He left probably left like twenty minutes ago so... I'd say six.

RD: Yeah no problem. That way [U/I] could just head out. I'm still counting the [U/I] things out so... Yeah [Voices overlap].

TB: I'll be thirty minutes, then.

RD: Alright I'll be here.

TB: Okay, bye.

RD: Alright, bye.

29. I believe this call is drug related. Specifically, I believe the following:

- a. Bellmore told Daniels that "Markey" (believed to be Mark Kilpatrick based upon surveillance and other interceptions) would pick up Bellmore's truck.
- b. Bellmore indicated he would be over to Daniels's house in twenty minutes to deliver marijuana.
- c. Daniels indicated he was still counting (likely money).
- d. Bellmore indicated he would then come in thirty minutes.

Use of Caregivers in an Effort to Legitimize Criminal Operation

30. On January 26, 2018, at 10:56 a.m., agents intercepted an incoming call to TT1 from TT2 (session 49). During this call, the following exchange occurred between Bellmore ("TB") and Daniels ("RD"):

TB: So if I do another, I might do another 216 plant rooms and a lab, and a nice, trim, dry trim room.

RD: Yup.

TB: But...

RD: The lab, I'm interested in the lab, get that extraction license let me know. I mean, you know...[Voice overlap]

TB: Because I'm gonna go, I'm gonna have somebody talk to the city of Lewiston and see how much, umm, you know, what do I gotta do to, to actually build it so we can do butane extraction right there.

RD: Yup.

TB: Because this is it, the legality of it is, umm...

RD: Yup, they're gonna attack butane pretty soon.

TB: What's that?

RD: I think they're gonna attack it, butane, pretty soon.

TB: Well, I can do with my building 'cause I can extract my own stuff.

RD: Right.

TB: You are not allowed to extract anybody else's stuff anymore.

RD: Oh, really?

TB: February 1st, no. So they go to your house and you have all this material, where is it from?

RD: Oh, yeah!

TB: You...

RD: That's crazy!

TB: So with me I can, I can, umm, I can lease the young guns space, which is almost 4000 square feet...

RD: Yup.

TB: To a caregiver.

RD: Oh, there you go.

TB: So say there's three caregivers in my building, they don't know where the product's from.

RD: Right.

TB: I can have it in a locker, closed room, lease to that caregiver and it makes it legal.

RD: Nice.

TB: So we might wanna think about move, you know. [Pause] And I'm gonna build a real dry room.

RD: [Coughs] Listen, I do wanna move. I want, you know what I mean? It's just gotta be the right thing. It's gotta be legal and it's gotta be the last time I move, you know what I mean? It's, umm, you know, move my business, 'cause it's getting really hard to move. [Laughs]

TB: Well, I mean, you can't really have that. Yeah, I mean, I think that after February 1st having that at your house it's going to be pretty much fucking [Pause] mad. [Voices overlap]

RD: Yeah, I know, but I'm not a caregiver. I'm a patient. And, actually, if anybody asks you about my patient thing I would just only say [Voices overlap]

TB: Yeah, the pro, it's the processing that's the issue.

RD: Oh, I know it is. Oh, I know.

TB: That's why you almost gotta keep it separate. If you gonna do, if you gonna do it on a little bit of the gray area you're better off to keep it separate.

RD: Yeah, I know.

TB: Now they can come in now if you're a caregiver and you're registered. They can come in your house or a patient's, they can come in your house anytime now.

RD: Right. If you're a patient?

TB: Umm, not sure about the patient right now but they were, they're trying to do that.

RD: Right, because I can just go, "Oh no, my client's run out, (U/I) I don't, I don't grow medically anymore. I just do recreational."

TB: But then they can get a search warrant, go in your house and say, "where, where the fuck is all this for?"

RD: Really?

TB: Yeah.

RD: Huh.

TB: So what I can [Voices overlapping]

RD: (U/I)

TB: So you're better off to put it under somebody's caregiver's license, in a building that's under them.

RD: Well, it's gotta be the right person. [Laughs]

TB: (U/I) I have extra.

Yeah, because it's either that or going in the middle of nowhere, you know, where nobody's gonna go and...

TB: Right.

RD: That's it. [Chuckles] Because [Voices overlap]

TB: Yup. You're not really doing anymore than anybody else.

RD: No, umm [Voices overlap]

TB: You just trying to doing it without...

RD: Oh, I'm fucking prepared too. If somebody would, like, say something with the, be said, I would just tell them my lawyer to say "no, I don't extract. I refine. [Chuckles] I refine things. I refine things that other people extracted." Is there a law against that? There ain't, right?

[Laughs]

TB: Right.

RD: Literally, that's what I would say. [Coughs] What's the butane for? The best (U/I) in, that's what it's for. [Laughs] [Audio glitch] I have tanks for CO₂ that I keep, just because ... (U/I) "no, I'm good with that." [Chuckles] (U/I) with butane. I've already talked to my lawyer about it and he goes, "No, that's genius." You know, as long as you don't say nothing to them and stick to the story, he goes: "That's no problem." [Laughs] Yeah, so...

TB: Alright, well let me go and when you get caught up, I'll be around.

RD: I'm telling you right now, I'll probably be done in an hour. [Laughs]

TB: Okay.

RD: I'll give you a call in an hour or two.

TB: Alright.

RD: Alright man. Have a good one.

TB: Bye.

RD: Bye.

31. I believe this portion of the call is drug related. Specifically, I believe the following:

- a. Bellmore indicated his desire to have another 216 plant room and a lab to make marijuana concentrate.
- b. Bellmore stated he wanted someone to talk with the City of Lewiston about building a butane extraction lab.
- c. Daniels stated that butane would come under legal scrutiny soon.
- d. Bellmore indicated that it's not legal to extract marijuana concentrate from someone else's plants.
- e. Bellmore discussed leasing a 4000 square foot building to a caregiver who does not know where the marijuana comes from and so long as it is leased to a caregiver, it is legal.
- f. Bellmore stated that harvesting at your own house is going to be problematic.
- g. Daniels acknowledged he is not a caregiver.
- h. Bellmore stated that it's better to operate under someone else's caregiver license in a building under the caregiver's name and claimed he had extra caregivers who would serve as a front for their operation.
- i. Daniels stated he would claim he doesn't extract marijuana concentrate. Instead, he just refines it.
- j. Daniels claimed he received legal advice about how to make his claim viable.
- k. The two agreed to meet later.

32. On February 16, 2018, agents intercepted an outgoing call from TT2 to (207) 318-9467 (session 4331). During this call, the following exchange occurred between Bellmore and Timothy Veilleux:

TB: Hey. I'm filling out my caregiver's license

TV: Yes.

TB: For Fourth Street. What's your – how do you spell your name?

TV: Veilleux. V-E-I-L-L-E-U-X.

TB: V-E-I-L-L-E-U-X.

TV: Yup.

TB: Home address?

TV: 354 Beech Hill Road

TB: Beech Hill Road. Yup.

TV: Auburn, Maine.

TB: Yup. That's it?

TV: That's it (U/I)

TB: Is it Timmy or Timothy?

TV: Ah, real name? Timothy.

33. Agents believe this call relates to Bellmore attempting to establish 97 4th Street as a medical marijuana location by fraudulently assigning Veilleux as a caregiver under Maine state law.

Bellmore Organization's Distribution to Out of State Customers

A. Seizure on August 24, 2017

34. On August 24, 2017, DEA agents established surveillance at 1302/1310 Sabattus Street, Lewiston, Maine, which is the residence of Richard Daniels and the outbuilding where I believe he manufactures marijuana concentrate.

35. At approximately 3:10 p.m., agents observed a black Chevrolet Suburban bearing Massachusetts registration 808T ("the black Suburban") arrive at the Daniels's residence.

36. At about 3:52 p.m., the black Suburban was driven away from the Daniels's residence. Agents followed the black Suburban southbound into New Hampshire. The black Suburban made no stops within Maine.

37. A New Hampshire State Trooper stopped the black Suburban for speeding in Greenland, New Hampshire. During the traffic stop, the driver was identified as John R. Valdes, with a listed residence of 2 Arlington Street, Amesbury, Massachusetts.

38. The New Hampshire State Police conducted a consensual search of the vehicle and located approximately six pounds of marijuana and \$15,221 in cash. The majority of the cash was located in a duffel bag with the marijuana.

B. Seizure on September 29, 2017

39. On September 29, 2017, agents conducting surveillance at Daniels's residence observed Daniels loading a large black bag into the trunk of a white Dodge Challenger bearing Texas Registration HLD 8506. Agents determined the white Challenger was a rental vehicle.

40. Law enforcement followed the white Challenger southbound on Interstate 95 and identified the driver as John Valdes. The white Challenger drove directly into the State of New Hampshire. A New Hampshire State Trooper stopped the white Challenger in Greenland, New Hampshire. Valdes consented to a search of the vehicle. During the search, law enforcement seized approximately six pounds of marijuana as well as suspected marijuana concentrate. The marijuana was inside of a black trash bag. The marijuana concentrate was inside of a pizza box.

C. Seizure on February 8, 2018

41. On February 8, 2018, law enforcement established surveillance at 1302/1310 Sabattus Street in Lewiston. During the early afternoon hours, a light colored Subaru arrived at this location. After the Subaru departed, law enforcement followed the Subaru and determined it bore Massachusetts registration 917YX1. This vehicle traveled on Interstate 95 into New Hampshire.

42. At about 3:55 p.m., a trooper with the New Hampshire State Police stopped this vehicle. The driver and sole occupant was identified as Steven Gallucci. During a search of the vehicle, the trooper seized a pizza box containing suspected Butane Honey Oil as well as two vacuum sealed bags and two large zip lock bags containing suspected processed marijuana. The trooper also seized cash. Gallucci stated that he had the case because he was unable to purchase as much marijuana as he wanted.

43. Following the traffic stop, agents intercepted a series of text messages between (978) 914-4041 and TT1. For example, on February 8, 2018, agents intercepted an incoming message to TT2 (session 985) stating, "Just so you know i got stopped and they took all my shit." On February 8, 2018, at 5:52 p.m., agents intercepted an incoming call to TT2 from (978) 914-4041 (session 1002). During this call, the following exchange occurred between Daniels and Gallucci:

RD: The smell is probable cause, not in New Hampshire, it's medical legal there.

SG: Yeah, I didn't think it was.

RD: Did he ask if you had a medical card?

SG: I even said that to him...no.

RD: Well I'll tell you what, can, do you have a medical card?

SG: I don't.

RD: Can you get one tomorrow?

SG: Maybe.

RD: In Massachusetts (unintelligible) oh, you don't even need it down there.

SG: Yeah, its "rec" (Recreational).

RD: Yeah, but if you can get a fucking medical one you can say you might even be able to argue to get that shit back (Laughing).

SG: Hmm...

RD: Um, cause you can transport, there's no law in Maine, and it was a New Hampshire State

Trooper?

SG: Yeah.

RD: Jesus Christ.

SG: Yep

RD: (Sigh's) Dude (U/I) the only thing I can tell you if you have any legal shit comes up I can help you with that.

SG: (U/I) Your money I'll get back

RD: My buddies waiting for the same thing, he's waiting for his fucking money, but then this is what your gonna do, you're gonna have to...huh?

SG: I said that sounds good at least I can get that back.

RD: What ya gonna have to do is like make out like a fake receipt, you know what I mean, just think of something, you know, you sold something on fucking Craig's List

SG: Mmm hmm.

44. I believe this call relates to the seizure from Gallucci. Specifically, I believe that Daniels asked Gallucci if he had a medical marijuana card. When Gallucci answered in the negative, Daniels suggested he should get one. Daniels then suggested that Gallucci should make up a fake receipt to present to law enforcement in order to secure the return of the seized cash.

D. Seizure on February 21, 2018

45. On February 21, 2018, agents conducted surveillance at 1302/1310 Sabattus Street in Lewiston. At approximately 2:20 p.m., agents observed a white vehicle bearing a Vermont registration parked in front of this residence. This vehicle departed 1302/1310 Sabattus Street at about 3:11 p.m.

46. Law enforcement officers followed the vehicle and a Maine State Trooper stopped it in New Gloucester, Maine. The vehicle was identified as a Lincoln MKS bearing Vermont registration DTD 910. The operator and sole occupant was identified as Charles Caliri by a Vermont driver's license.

47. The operator began sweating profusely and complained of a "tingling" feeling in his body. The trooper called EMS. Caliri was transported to a hospital.

48. During a search of the Lincoln, law enforcement seized three zip lock bags and five vacuum sealed bags containing suspected marijuana. Law enforcement also seized cash from inside a jacket in the vehicle.

49. The trooper responded to a local hospital and met Caliri. Caliri stated he traveled to Maine to purchase marijuana because it is cheaper than what he would pay in Vermont.

E. Seizure on February 25, 2018

50. On February 24, 2018, and February 25, 2018, interceptions over TT2 revealed that a male named Yehudi Pardo was traveling from Massachusetts to Maine to acquire marijuana related items from Bellmore. Law enforcement had previously identified Pardo's vehicle on surveillance. On February 25, 2018, a law enforcement officer stopped this vehicle traveling northbound in Maine. During the stop, the law enforcement officer seized more than \$30,000 in cash and a loaded firearm. Pardo was not arrested. Following the stop, agents intercepted Pardo describing the stop to Bellmore over TT2.

Bellmore's Asset Concealment and Money Laundering Activities

51. On October 8, 2015, Timmy Bellmore filed for Chapter 7 bankruptcy in the United States Bankruptcy Court for the District of Maine. In his bankruptcy petition, Bellmore declared the following under penalties of perjury:

- a. He owned no real property.
- b. He had \$80.00 cash on hand.
- c. He had \$25.00 in a checking account at Maine Family CU.
- d. He had \$25.00 in a savings account at Maine Family CU.
- e. He had \$1000.00 in household goods.
- f. He had \$100.00 in wearing apparel.
- g. He owned no automobiles.
- h. His total personal property was valued at \$1,230.00.
- i. He was self-employed selling cars and had been doing so for 1+ years.
- j. He had no income.
- k. He earned \$1,906.97 per month in interest and dividends, which represented all of his monthly income.

- l. He had monthly expenses of \$1,891.40.
- m. His total net income was \$15.57 per month.

52. On February 14, 2108, agents intercepted an outgoing call from TT2 to (207) 281-2812 (session 3046). During this call, Bellmore told Mark Kilpatrick that he was looking at motorcycles at the Harley dealership. Bellmore described a motorcycle he wanted to purchase and how he would trade in three other motorcycles. Bellmore went on to say, "I just don't want to put it in my name."

53. Later on February 14, 2018, agents intercepted an incoming call to TT2 from (207) 318-9467 (session 3184). During this call, Bellmore told Timothy Veilleux that he was thinking of trading in his motorcycle to get another one. Bellmore stated he would "put it under 1830 LLC." Veilleux responded, "You can put it under there all you want."

54. Agents believe these calls relate to Bellmore's laundering of drug proceeds by purchasing assets in the names of third parties to conceal the actual owner and source of the money. Agents believe that Bellmore wanted to title the motorcycle under the corporation 1830 LLC, which is the name of the company that owns Euro Motors.

55. On February 14, 2108, at 1:43 p.m., agents intercepted an outgoing call from TT2 to (207) 577-4166 (session 3038). During this call, the following exchange occurred between Bellmore and Tyler Poland:

TP: You spent 100 grand on what?

TB: Cars

TP: Holy shit. Where?

TB: (U/I) AuburnLaughing

TP: Where?

TB: Auburn

TP: Did you really?

TB: Yeah

TP: What they have running? They have anything good?

TB: I fucking bought a,

- 13 Yukon in the brapper

- Bought a 14 GOK Diesel

- I bought an Escalade

- I bought a 14 Impala LTZ

- I bought a X3 BMW

- 14 Expedition King Ranch with my favorite interior in the whole world.

TP: Really? Is it like, like a, like a real rustic looking leather?

TB: Yeah it's that baseball glove soft...

TP: Oh yeah, that stuff's nice.

TB: Shits fucking nice!

56. Agents believe this portion of the call relates to Bellmore laundering his drug proceeds through auto auctions.

**ADDITIONAL FACTS FOR LOCATIONS TO BE SEARCHED
AND PROPERTY TO BE SEIZED**

1830 Lisbon Street, Lewiston, Maine

57. 1830 Lisbon Street, Lewiston, Maine, (formerly known as 1830 North Lisbon Road) is a business known as Euro Motors. I believe based on wire interceptions, confidential informant reporting, and the overall investigation that there is a large, multi-room marijuana

grow inside of 1830 Lisbon Street that is under the management of the Bellmore organization. I believe there is probable cause to search this location for reasons including the following:

- a. According to property records, this property sold on November 10, 2016 for \$280,000. The listed owner is 1830 Lisbon Street, LLC. Timothy Veilleux has an ownership interest in this LLC and in the Maine Secretary of State's 2018 Annual Report is listed as the charter member and/or authorized person. In 2016, Veilleux signed the establishment documents for the LLC as well.
- b. SOI-1 reported that Timothy Veilleux owns Euro Motors in Lewiston and works for Bellmore. Veilleux has properties in his name for Bellmore and has marijuana cultivation rooms being built in the back of his car dealership.
- c. SOI-2 identified Euro Motors as a site of a marijuana grow operated by the Bellmore organization.
- d. SOI-3 stated that Timmy Bellmore and Timothy Veilleux installed \$225,000.00 to \$250,000.00 of electrical upgrades at Euro Motors on Lisbon Road. Bellmore told people he invested a total of \$800,000 to \$900,000 upgrading the infrastructure to increase grow capacity (yield) of the Euro Motors cultivation location.
- e. Bellmore told SOI-3 the grow location at Euro Motors was currently generating \$190,000.00 to \$200,000.00 in gross proceeds per harvest cycle every five to seven weeks. After expenses, Timmy Bellmore expected to profit approximately \$130,000.00 per cycle from that location only.
- f. SOI-5 stated that Veilleux has cars on a lot at Euro Motors that he tries to sell. Inside Euro Motors are six classic cars belonging to Bellmore. SOI-5 observed these cars last summer.

- g. SOI-5 stated that last summer, SOI-5 assisted with the installation of four grow rooms totaling 72 plants at Euro Motors.
- h. On February 20, 2018, agents intercepted the following text messages between TT2 (used by Bellmore) and (207) 754-4731 (used by Abby Luttrell):

Session	Date	Time	Sending Number	Receiving Number	Content
6967	2/20/18	6:33 a.m.	(207) 754-4731	TT2	An I trimming today?
6969	2/20/18	6:33 a.m.	TT2	(207) 754-4731	How much do we have to do at euro...clines need to be done also...but can wait till tomorrow
6971	2/20/18	6:35 a.m.	(207) 754-4731	TT2	I believe just transplanting Clones Pick leaves Burping
6973	2/20/18	6:35 a.m.	(207) 754-4731	TT2	I can work late tonight
6975	2/20/18	6:36 a.m.	TT2	(207) 754-4731	Did 15 plantvroom get done
6977	2/20/18	6:36 a.m.	(207) 754-4731	TT2	No
6979	2/20/18	6:36 a.m.	TT2	(207) 754-4731	Needs to be done
6983	2/20/18	6:37 a.m.	(207) 754-4731	TT2	Ok I will water here and go to euro

Agents believe these messages are drug related. Specifically, they believe that Luttrell asked Bellmore if she was to trim marijuana plants on February 20. Bellmore and Luttrell then discussed the amount of work to be done tending to the marijuana plants at Euro Motors.

- i. Bellmore receives regular text message updates from a company called Lacrosse Technology about temperature and humidity readings at various locations. For example,

on February 21, 2108, agents intercepted an incoming text message to TT2 (session 7503) stating “alerts@lacrossetechnology.com (Alert) Device name: EuroC had a Min Alert for Humidity with 51% being reported.” Also on February 21, 2018, agents intercepted an incoming text message to TT2 (session 7505) stating, “alerts@lacrossetechnology.com (Alert) Device name: ‘EuroA’ had a Min Alert for Humidity with 54% being reported.” I believe these messages relate to the conditions of marijuana grow rooms at Euro Motors.

- j. Agents assigned to surveillance have regularly observed Bellmore, Veilleux, and other members of this drug organization at 1830 Lisbon Street, Lewiston, Maine, in February 2018.

230 Merrow Road, Auburn, Maine

58. 230 Merrow Road, Auburn, Maine, is a business complex. This business used to be known as KCI. I believe based on wire interceptions, confidential informant reporting, and the overall investigation that there is a marijuana grow inside of 230 Merrow Road, Auburn, Maine. I believe there is probable cause to search this location for reasons including the following:

- a. Property records show MR LLC is the owner of this property. Property records further show this property sold on November 1, 2016, for \$300,000.
- b. SOI-2 identified 230 Merrow Road, Auburn, Maine, as a marijuana grow location operated by the Bellmore drug organization.
- c. SOI-3 has personal knowledge that over the summer of 2015, Bellmore, Brian Bilodeau, and Tyler Poland were looking to rent 230 Merrow Road, Auburn, Maine to utilize the rooms and grow marijuana. Bellmore, Bilodeau, and Poland were granted access to the

property. There was never a formal written signed lease. SOI-3 was personally aware that shortly after the initial meeting Bellmore and Bilodeau began installing the grow operation.

- d. SOI-3 has personal knowledge that in November 2016, Bilodeau and Kevin Dean purchased 230 Merrow Road for \$400,000 despite a contract executed in November 2016, which stated the purchase price was \$300,000.⁸ The purchase price was to be paid in increments of \$50,000 over approximately eight months to allow time for this drug organization to harvest and sell marijuana and use the proceeds for payment of the loan. SOI-3 has personal knowledge that Bilodeau paid the full \$400,000 with cash by July 2017 in cash installments.
- e. Agents observed Bilodeau and Timmy Bellmore at 230 Merrow Road Auburn, Maine in the late summer/early fall of 2017. 230 Merrow Road is listed as a medical marijuana cultivation warehouse. Agents conducting surveillance have observed Bilodeau at 230 Merrow Road Auburn, Maine loading contractor sized trash bags full of suspected cultivated marijuana into his vehicle, a blue 2017 GMC Sierra bearing Maine registration 6113VA. Agents followed Bilodeau from 230 Merrow Road to Richard Daniels's residence located at 1302/1310 Sabattus Street Lewiston, Maine where agents observed Bilodeau and Daniels unloading the same trash bags into what agents have revealed as Daniels's marijuana storage room.

⁸ During interviews, SOI-3 has provided different information about the sales terms of 230 Merrow Road. Agents believe SOI-3 is attempting to minimize his/her profit and thus any potential tax burden.

- f. SOI-5 told agents that in the summer of 2014, this organization installed a 72 plant marijuana grow at 230 Merrow Road in Auburn.
- g. I believe Kevin Dean and Brian Bilodeau retain control of this marijuana grow location. The registered owner of 230 Merrow Road is MR LLC. The Maine Secretary of State report reveals Kevin Dean as the member/manager and/or authorized person. I further believe based on interceptions that Bilodeau is currently behind on paying the workers at this location.
- h. I believe Danny Bellmore –Bellmore’s brother – remains the primary worker at this location. Danny Bellmore and Bellmore have regularly been intercepted discussing the status of this grow, Bilodeau’s payments, and Bilodeau’s efforts to make money with Kevin Dean now that Bilodeau and Bellmore split.⁹
- i. On February 12, 2018, agents intercepted a call between Timmy Bellmore and Danny Bellmore (session 2224) during which Danny Bellmore stated, “Brian came in today and took some inventory.” I believe this is a reference to Brian Bilodeau inspecting the quantity of marijuana available at 230 Merrow Road. Danny Bellmore went on to relate how this person (Brian) went on to say, “I’ve got about 500 to move.” Danny Bellmore then discussed “what came down at KCI”¹⁰ and “two weeks before that he had a room come down with a hundred and something.” I believe this is a reference to Bilodeau’s marijuana harvests and having 500 pounds to sell.

⁹ Bilodeau has not been intercepted speaking with Bellmore. I believe following their split that Bellmore obtains information about Bilodeau’s status in the marijuana business through conversations with others – including Danny Bellmore.

¹⁰ KCI is known to agents to be the name of a former business located at 230 Merrow Road, Auburn, Maine.

- j. On February 20, 2018, agents intercepted an outgoing call from TT2 to (207) 577-4166 (session 7264). During this call, Bellmore told Tyler Poland about a 2014 van that he had “all the weight from KCI in it yesterday.” I believe this call references hauling the marijuana harvest from 230 Merrow Road in Bellmore’s van.
- k. Agents assigned to surveillance have observed Danny Bellmore and other members of this drug organization at 230 Merrow Road, Auburn, Maine, in February 2018.
- l. On February 23, 2018, agents intercepted an incoming call to TT2 from (207) 212-4019 (session 9214). During this call, a male believed to be Dennis Lebel told Bellmore that he is owed over \$60,000 (based on the call, I believe the payment is due from Bilodeau and Dean). Bellmore went on to indicate he has been trying to stay out of this situation as that is one of the buildings he gave up in the split and his brother and a kid Bellmore trained are currently working there. Bellmore stated he walked away four months ago and has made 3-4 times more than them. I believe in this call, Lebel complains about being owed money for work done at 586 Lewiston Junction Road, which is known as “Cascades.” I believe Bellmore indicated he is not involved in that location and gave up control of that location when he split with Bilodeau. I believe Bellmore referenced Danny Bellmore still working at 230 Merrow Road along with someone else (Brandon Knutson) Timmy Bellmore trained. Finally, I believe Timmy Bellmore boasted that he makes 3-4 times as much money as Bilodeau and Dean.
- m. Following the above referenced call, agents intercepted an outgoing text message from TT2 to (207) 212-0688 (session 9229). This message stated, “I just got off the phone with lebel...wtf.” I believe this is Bellmore telling Danny Bellmore that he just spoke with Dennis Lebel. Agents intercepted a responsive text message (session 9255) stating,

“Like I said one more month and if things don’t get better I’m gone. I’m not dating anything to him because he will just bait me with a little bit of money.” I believe this is Danny Bellmore indicating he would stay at 230 Merrow Road for one more month and would leave if the financial situation did not improve.

249 Merrow Road, Auburn, Maine

59. 249 Merrow Road, Auburn, Maine, is a business complex with a residence at the front of the driveway. I only seek authorization to search the commercial buildings and other outbuildings behind the residence on the property. I do not seek authorization to search the residence at this time.

60. I believe based on wire interceptions, confidential informant reporting, and the overall investigation that there is a marijuana grow inside of 249 Merrow Road, Auburn, Maine, that is under the management of a member of the Bellmore organization. I believe there is probable cause to search this location for reasons including the following:

- a. Property records further show a sale in the amount of \$500,000 on March 9, 2016, to Central Maine Landvest, LLC. There is a commercial promissory note executed on November 21, 2017, between Central Maine Landvest, LLC, and Ty Properties, LLC, in the amount of \$500,000. The Maine State Secretary of States report lists TY Properties LLC as the registered owner of 249 Merrow Road. Tyler Poland is the member/manager and/or authorized person for this LLC. TY properties are listed on the closing documents for 249 Merrow Road.
- b. In October 2016, SOI-1 reported that Bellmore recently purchased the old “T Buck Construction” building located at 249 Merrow Road in Auburn and is converting it to a medical marijuana cultivating facility. The building is not in Bellmore’s name.

- c. SOI-2 identified 249 Merrow Road as a marijuana grow location operated by the Bellmore drug organization.
- d. SOI-3 has personal knowledge that members of this drug organization also utilized the property located at 249 Merrow Road to cultivate marijuana. According to SOI-3, Tyler Poland is one of the people behind the operation at 249 Merrow Road.
- e. During the summer of 2016, SOI-3 was inside of buildings located at 249 Merrow Road and observed marijuana cultivation inconsistent with someone's personal use. SOI-3 told law enforcement that Poland recently added a second floor to one of the buildings at 249 Merrow Road to double his production capacity.
- f. SOI-3 has personal knowledge that Tyler Poland entered into an agreement on November 21, 2017, to purchase 249 Merrow Road for \$500,000. In connection with this transaction, Poland delivered the seller an additional \$200,000 in cash outside the scope of the contract. Poland is scheduled to pay approximately \$16,300 per month over the next three years to cover principal and interest related to his acquisition of 249 Merrow Road. SOI-3 has personal knowledge that Poland made advance payments towards the total cost in the amounts of \$17,000 in December 2017, \$120,000 in January 2017, and \$130,000 in February 2017.
- g. Law enforcement officers observed Poland and the seller of 249 Merrow Road together on November 21, 2017.
- h. SOI-5 stated that Bellmore contracted with Terry Buck of T. Buck Construction to acquire property at 249 Merrow Road in Auburn. SOI-5 subsequently installed a 72 plant marijuana grow at this location.
- i. On February 14, 2018, this Court issued a search warrant authorizing agents to collect the

content of text messages from servers maintained by Verizon Wireless. This warrant applied to telephone number (207) 577-4166 ("Target Telephone 5" or "TT5"). The listed subscriber for TT5 is Tyler A. Poland of 474 Quaker Ridge Road, Greene, Maine. Based on the investigation to date, I believe that Tyler Poland is the user of TT5.

j. Verizon Wireless produced records in response to this search warrant. Among the message seized were the following:

- i. On February 9, 2018, at 9:21 a.m., there was an outgoing message from TT5 to (207) 740-6579 stating, "When were the bulbs changed in 4? I notes up here say 2/18/17."
- ii. At 9:30 a.m., there was an incoming message to TT5 from (207) 740-6579 stating, "Sounds good bud.rooms ready to go ...pulling plants and getting ready for coco."
- iii. At 3:40 p.m. that same day, there was an incoming message to TT5 from (207) 740-6579 stating, "Can you come check out rm 4 some gevitass aren't coming on dosnt make since to me."

I believe that this is a communication involving Poland asking a trimmer about the status of lighting and automated equipment within the grow location at 249 Merrow Road. The trimmer also updates Poland as to the status of marijuana for cultivation and feed.

17 Bridge Street, Lewiston, Maine

61. 17 Bridge Street, Lewiston, Maine, is a business complex. I believe based on wire interceptions, confidential informant reporting, and the overall investigation that there is a marijuana grow inside of 17 Bridge Street, Lewiston, Maine, that is under the management of the Bellmore drug organization. I believe there is probable cause to search this location for reasons

including the following:

- a. Property records show a sale on November 30, 2015, with the purchaser as Comvest, Inc. The deed is signed by Timothy Veilleux, who is listed as the President of Comvest.
- b. SOI-2 identified 17 Bridge Street, Lewiston, Maine as a marijuana grow location operated by the Bellmore organization.
- c. SOI-3 overheard Timmy Bellmore state to Timothy Veilleux that Timmy Bellmore bought out the financial interest of Brian Bilodeau and Kevin Dean at 18 Bridge Street, Lewiston, Maine. Agents now believe the correct address is 17 Bridge Street.
- d. SOI-5 stated that Greg Pelletier runs a marijuana grow behind the hospital (this is consistent with 17 Bridge Street).
- e. On February 19, 2018, law enforcement officers observed Greg Pelletier building a shelter for several outdoor condensing units along the building at 17 Bridge Street.¹¹ I know based on my training and experience that these units are commonly used in marijuana cultivation.
- f. Also on February 19, 2018, agents observed Pelletier make two trips between 17 Bridge Street and Euro Motors in a pick-up truck pulling a box trailer. On one such trip, law enforcement observed a woman secure the gate at 17 Bridge Street after Pelletier left. This woman was identified as Carole Theriault. Based on wire interceptions over TT2, I believe that Carole Theriault is a marijuana trimmer for this organization.
- g. On February 19, 2018, agents intercepted an incoming call to TT2 from (207) 346-1117 (session 6464). Based on other interceptions, I believe (207) 346-1117 is used by Greg

¹¹ Law enforcement initially identified this property as 18 Bridge Street following the reporting from confidential sources.

Pelletier. During this call, the following exchange occurred:

TB: What are you doing there? You hanging out?

GP: I'm fucking trimming.

TB: Why?

GP: Cause I gotta get that room done today...just kept the lights on.

TB: What's that?

GP: I gotta get that one room done today.

TB: (Voice Overlap)

GP: I don't know, Carol's gonna leave at noon so...

TB: For what?

GP: To go run the trimmer.

- h. I believe this exchange relates to trimming marijuana at 17 Bridge Street in Lewiston.
- i. On February 12, 2018, agents intercepted an incoming call to TT2 from (207) 783-2811 (session 2066). During this call, Veilleux told Bellmore that the insurance bill was due for Bridge Street.

29 Avon Street, Lewiston, Maine

62. 29 Avon Street, Lewiston, Maine, is a business complex. I believe based on wire interceptions and the overall investigation that there is a marijuana grow inside of 29 Avon Street, Lewiston, Maine, that is under the management of the Bellmore drug organization. I believe there is probable cause to search this location for reasons including the following:

- a. Property records show a sale on May 2, 2016, to Willie Moe Entertainment, Inc.
- b. On February 5, 2018, law enforcement officers observed Bellmore drive a cargo van from Euro Motors to a restaurant in Lewiston. Bellmore then left the restaurant and

drove to Avon Street in Lewiston. Law enforcement observed this van parked in front of 29 Avon Street.

- c. After about two hours, law enforcement observed the van leave and identified Bellmore as the operator. Bellmore proceeded to drive to 97 Fourth Street in Auburn. After leaving 97 Fourth Street, Bellmore drove in the van to Euro Motors.
- d. Bellmore receives regular text message updates from a company called Lacrosse Technology about temperature and humidity readings at various locations. For example, on February 9, 2108, agents intercepted an incoming text message to TT2 (session 295) stating “alerts@lacrossetechnology.com (Alert) Device name: ‘Avon big room’ had a Max Alert for Humidity with 71% being reported.” On February 13, 2108, agents intercepted an incoming text message to TT2 (session 2635) stating “alerts@lacrossetechnology.com (Alert) Device name: ‘Avon big room’ had a Max Alert for Temp with 80.3F being reported.” On February 20, 2108, agents intercepted an incoming text message to TT2 (session 7373) stating “alerts@lacrossetechnology.com (Alert) Device name: ‘Avon big room’ had a Max Alert for Humidity with 73% being reported.” I believe these messages relate to the conditions of marijuana grow rooms at 29 Avon Street.
- e. On February 12, 2018, agents intercepted an incoming call to TT2 from (207) 346-1117 (session 2059). During this call, Bellmore told Pelletier that he went to Avon to water and was headed back to Avon mid-afternoon to water and start cutting.
- f. On February 15, 2018, agents intercepted an outgoing call from TT2 to (207) 320-1233 (session 3443). During this call, Bellmore told an unknown male that he was watering Avon.

- g. On February 15, 2018, agents intercepted an outgoing text message from TT2 to (207) 576-6384 (session 3457) stating, "How old are the bulbs at avon." I believe this message is Bellmore inquiring about the status of growing lights used in furtherance of his marijuana grow.
- h. On February 18, 2018, at approximately 10:40 a.m., law enforcement officers drove by 29 Avon Street and observed a white GMC with used car dealer Maine registration 1554 parked in the driveway. Bellmore was seen operating that vehicle at approximately 10:02 a.m. earlier that morning. At approximately 10:47 a.m., a law enforcement officer observed a maroon dodge high top van with used car dealer Maine registration 930 assigned to Euro Motors operating on Bridge Street in Lewiston. Law enforcement identified the operator of the maroon dodge van as Mark Kilpatrick. At approximately 10:48 a.m., law enforcement officers observed the maroon dodge van park in the driveway of 29 Avon Street.

97 Fourth Street, Auburn, Maine

63. 97 Fourth Street, Auburn, Maine, is a two story business complex. I believe based on wire interceptions and the overall investigation that there is a marijuana grow inside of 97 Fourth Street, Auburn, Maine, that is under the management of the Bellmore drug organization. I believe there is probable cause to search this location for reasons including the following:

- a. Property records show a sale on April 21, 2016. The owner is listed as Timothy L. Veilleux.
- b. On February 8, 2018, agents intercepted an incoming call to TT2 from (207) 689-5182 (session 193). During this call, Bellmore told a male that Fourth Street is almost done

and that he is meeting with Matt tomorrow to discuss what he needs to do for an ethanol extraction lab for his trip. Bellmore went on to discuss how to get a permit for a lab through the City of Lewiston.

- c. On February 16, 2018, agents intercepted an outgoing call from TT2 to (207) 318-9467 (session 4331). During this call, the following exchange occurred between Bellmore and Timothy Veilleux:

TB: Hey. I'm filling out my caregiver's license

TV: Yes.

TB: For Fourth Street. What's your – how do you spell your name?

TV: Veilleux. V-E-I-L-L-E-U-X.

TB: V-E-I-L-L-E-U-X.

TV: Yup.

TB: Home address?

TV: 354 Beach Hill Road

TB: Beach Hill Road. Yup.

TV: Auburn, Maine.

TB: Yup. That's it?

TV: That's it (U/I)

TB: Is it Timmy or Timothy?

TV: Ah, real name? Timothy.

- d. Agents believe this call relates to Bellmore attempting to establish 97 4th Street as a medical marijuana location by fraudulently assigning Veilleux as a caregiver under Maine state law.

- e. On February 19, 2018, agents intercepted the following text messages between TT2 and (207) 776-8868 (used Linda Murrill-Higgins):

Session	Date	Time	Sending Number	Receiving Number	Content
6349	2/19/18	7:07 a.m.	(207) 776-8868	TT2	You're not going to get fourth Street up and running or just that back room you're not gonna do that right now I'm trying to finish up a few small jobs t (continued)
6350	2/19/18	7:07 a.m.	(207) 776-8868	TT2	(continued) his week so I can concentrate on your house a euro whichever one you want to do first
6357	2/19/18	7:08 a.m.	TT2	(207) 776-8868	Might do just do gravitas
6359	2/19/18	7:08 a.m.	TT2	(207) 776-8868	At 4th....i can't get Matt to do anything

- f. I believe these messages are drug related. Specifically, I believe that Bellmore and Murrill-Higgins discussed the marijuana grow at 97 Fourth Street in Auburn. I believe that Bellmore indicated he might just grow gravitas, which is a strain of marijuana.
- g. On February 19, 2108, at 12:12 p.m., agents intercepted an outgoing call from TT2 to (207) 281-2812 (session 6525). During this call, Bellmore asked Mark Kilpatrick when Fourth Street would be done. Kilpatrick stated they were working there right now. Kilpatrick went on to state that they were painting. Kilpatrick indicated they needed to reinforce the floor and build a wall so they could get a permit and final inspection.
- h. I believe this call also relates to the operation of a marijuana grow at 97 Fourth Street.

555 Lincoln Street, Lewiston, Maine

64. 555 Lincoln Street, Lewiston, Maine, is a business complex. I believe based on wire interceptions and the overall investigation that there is a marijuana grow inside of 555 Lincoln Street, Lewiston, Maine, that is under the management of the Bellmore organization. I believe there is probable cause to search this location for reasons including the following:

- a. Tim Veilleux is the owner of Ben Alpren Machine Tool & Supply.
- b. As described in this affidavit, I believe Veilleux is a member of this drug organization.
- c. SOI-2 identified Ben Alpren Machine Tool & Supply, Lewiston, Maine (which is the business located at 555 Lincoln Street) to be a marijuana grow site.
- d. On February 10, 2018, agents intercepted a call between Bellmore and Mark Kilpatrick (session 1207). During this call, Bellmore stated that he was "hoping to get it all gone before we start trimming." Bellmore went on to complaint that "Abby's not gonna be at fucking Lincoln Street until 10 o'clock." I believe this call relates to trimming of marijuana plants at 555 Lincoln Street. I further believe that "Abby" is Abby Luttrell.
- e. On February 11, 2108, agents intercepted an incoming text message to TT2 (session 1677) stating "alerts@lacrossetechnology.com (Alert) Device name: 'Lincoln st back room' had a Min Alert for Humidity with 48% being reported." On February 19, 2108, agents intercepted an incoming text message to TT2 (session 6387) stating "alerts@lacrossetechnology.com (Alert) Device name: 'Lincoln st back room' had a Max Alert for Humidity with 69% being reported." I believe these messages relate to the conditions of a marijuana grow room at 555 Lincoln Street. Agents intercepted numerous other such messages related to temperature and humidity conditions at "Lincoln st back room" as well as "Lincoln st front rm."

1315 Sabattus Street, Lewiston, Maine

65. In addition to the information set forth above, I also note the following about 1315 Sabattus Street, Lewiston, Maine:

- a. This location is known as the Independent Auto Annex. It is across Sabattus Street from Independent Auto. According to Secretary of State's website, Timmy Bellmore of 57 Fair Street, Lewiston, Maine, is the Clerk/Registered Agent of Independent Auto.
- b. During the course of the wiretap, Bellmore regularly discusses Independent Auto.
- c. The main car lot is across the street from 1315 Sabattus Street. 1315 Sabattus Street contains a single story building with additional cars.
- d. This lot is in close proximity to Richard Daniels's house.
- e. I learned that on December 6, 2017, a detective with the Bureau of Motor Vehicles, Office of Investigations went to Independent Auto (1298 Sabattus Street) to complete an inspection for an additional lot at 1315 Sabattus Street. While inside of the building at 1315 Sabattus Street, the detective observed a potential office space and a large padlocked garage door. The detective smelled a strong odor of fresh marijuana inside this building.
- f. The sales manager, Nick Danforth, told the detective that Bellmore is not involved in the day-to-day operations of the car business.
- g. Danforth told the detective that Bellmore takes a financial loss on a lot of vehicles (which I believe is consistent with an effort to launder drug money and not run a profitable business).
- h. On February 14, 2018, agentes intercepted a call from T2 to (207) 577-4166 (session 3038). During this call, Bellmore told Tyler Poland, "Some are fucking, they are like

Greg's almost a four or five day room. All my Euro stuff is usually a two ..Sabattus Street box is like a three or 4." I believe Bellmore is discussing how long it takes to trim or harvest a room and made particular reference to his marijuana grow on Sabattus Street.

- i. On February 21, 2018, agents interested a call from TT2 to (207) 346-1117 (session 7662). During this call, Bellmore discussed how Sabattus needed to be transplanted. I believe this involves transplanting marijuana plants.
- j. In light of Bellmore's ownership of Independent Auto, the BMV detective smelling fresh marijuana at 1315 Sabattus Street, and interceptions about an active marijuana grow at Sabattus Street, I believe this grow is in fact located at 1315 Sabattus Street.

57 Fair Street, Lewiston, Maine

66. In addition to the information set forth above, I also note the following about 57 Fair Street, Lewiston, Maine, and Bellmore's involvement in drug trafficking and money laundering:

- a. Property records show this property is owned by TMB Auto, LLC. The property was acquired by TMB Auto, LLC, on January 17, 2018. I believe Bellmore occupied this property prior to January 17, 2018. He previously owned this property before title transferred to The Tea Room, LLC. On January 17, 2018, title transferred from The Tea Room, LLC, to TMB Auto, LLC.
- b. 57 Fair Street is Timmy Bellmore's residence.
- c. During surveillance operations throughout this investigation, agents have observed Bellmore and vehicles known to be operated by Bellmore at 57 Fair Street. This includes surveillance observations as recently as February 18, 2018.

- d. As described in this affidavit, Bellmore is the leader of this organization. I believe this organization has been in existence for multiple years and derives substantial amounts of money from its activities. I also believe that Bellmore has significant assets, to include assets register or owned in the names of others. This organization also uses sophisticated means to include LLCs, car dealerships, and third parties to launder its money. I believe Bellmore's residence will contain evidence of this organization's unlawful marijuana activities as well as its money laundering methods and specific instances of money laundering.

72 Danville Corner Road, Auburn, Maine and Seizure of
2016 Lamborghini and 2014 Nissan GT-R

67. In addition to the information set forth above, I also note the following about 72 Danville Corner Road, Auburn, Maine, and Bilodeau's involvement in drug trafficking and money laundering:

- a. Property records show 72 Danville Corner Road is owned by Brian Bilodeau. Property records further show a deed signed on January 20, 2015, and a mortgage filed on October 13, 2016.
- b. 72 Danville Corner Road is Brian Bilodeau's residence.
- c. In October 2016, SOI-1 reported that Bilodeau had a safe in his residence with millions of dollars, half of which belong to Bellmore.
- d. In September 2016, SOI-3 observed an empty safe built into the basement foundation of Bilodeau's residence.
- e. SOI-5 knew Bilodeau to be partners with Bellmore and responsible for altering the books and records of Bellmore's car lots to account for marijuana income.

- f. SOI-5 stated that Bilodeau has a safe on the first floor of his residence.
- g. In a finance agreement for a 2016 Lamborghini, Bilodeau's address is listed as 72 Danville Corner Road, Auburn, Maine.

68. SOI-5 stated that Bellmore and Bilodeau were partners through the summer of 2017. SOI-5 further stated that Bilodeau was responsible for altering the books and records of Bellmore's car lots to account for marijuana income.

69. Based on wire interceptions over TT2, I believe that Bellmore and Bilodeau are no longer partners in the marijuana trade. Among other things, during an interception on February 9, 2018 (session 495), Bellmore told Tyler Poland, "Nothing, nothing, nothing against him at all, I got nothing bad to say but I'm, I'm so much less stressed everybody knows now that we have nothing to do with each other so I don't hear about what he does." I believe this statement is a reference to Bellmore's separation from Bilodeau.

70. However, interceptions reveal that Bilodeau is still an active marijuana cultivator and trafficker. For example, on February 12, 2018, agents intercepted a call between Bellmore and Danny Bellmore (session 2224) during which Danny Bellmore stated, "Brian came in today and took some inventory." I believe this is a reference to Brian Bilodeau inspecting the quantity of marijuana available at a particular location. Danny Bellmore went on to relate how this person (Brian) went on to say, "I've got about 500 to move." Danny Bellmore then discussed "what came down at KCI"¹² and "two weeks before that he had a room come down with a hundred and something." I believe this is a reference to Bilodeau's marijuana harvests. Danny Bellmore then indicated that he (Brian) had "close to 500 to get rid of" and "I guess he's got somebody on the

¹² KCI is known to agents to be the name of a former business located at 230 Merrow Road, Auburn, Maine.

hook for it.” I believe this is a reference to Bilodeau having 500 pounds of marijuana to sell with a potential buyer lined up.

71. On February 13, 2018, agents intercepted Timmy Bellmore telling Brandon Knutson (session 2595), “My brother said that Brian’s -- after this week, gonna have like five hundred.” Knutson responded, “Yeah. Something like that. With all the rooms.” I believe this is Timmy Bellmore repeating what Danny Bellmore told him about Bilodeau having 500 pounds for sale. I further believe that Knutson confirmed Timmy Bellmore’s statement and indicated that Bilodeau has multiple marijuana growing rooms to produce this output.

72. I note that Bilodeau currently has the following vehicles registered in his name: A black 2013 BMW 3-Series bearing Maine Registration 5987VM, a black 2014 Nissan GT-R bearing Maine Registration EVILR, a black 2009 Volkswagen CC bearing Maine Registration 8501VR, a 2016 Mercedes E-Class bearing Maine Registration 3299UR, a blue 2016 Lamborghini bearing Maine Registration STARBOY, and a blue 2017 GMC Sierra bearing Maine Registration 6113VA.

73. On February 14, 2018, this Court issued a search warrant authorizing agents to collect the content of text messages from servers maintained by Verizon Wireless. This warrant applied to telephone number (207) 577-5870 (“Target Telephone 3” or “TT3”). The listed subscriber for TT3 is Brian Bilodeau of 26 Loring Ave, Auburn, ME. Based on the investigation to date, I believe that Brian Bilodeau is the user of TT3. This phone also shows regular contact with a female believed to be Bilodeau’s girlfriend.

74. Verizon Wireless produced records in response to this search warrant. Among the message seized are the following:

- a. On February 9, 2018, there was an outgoing message from TT3 to (207) 577-2365 stating, "I can send the numbers. Not official returns." Four minutes later there was an outgoing message from TT3 to this same number stating, "48k Caregiver wage\n29k car sales\n73k consulting\n7,800 rental income\n41,680 Car Wash profit \n." I believe based on this message and other seized messages that Bilodeau is accounting for his income in 2016.
- b. On February 12, 2018, at 12:06 p.m., there was an outgoing message from TT3 to (207) 240-7307 stating, "Hey man. How things looking?" At 12:54 p.m., there was an incoming message from (207) 240-7303 to TT3 stating, "I'll need something by Thursday." Also at 12:54 p.m., there was an outgoing message from TT3 to (207) 240-7307 stating, "Ok I will prob drop it tomorrow or Wednesday then." At 12:55 p.m., there was an incoming message to TT3 from (207) 240-7307 stating, "Okay buddy 10 will be cool animal pound of shatter." I believe the user of (207) 240-7307 obtains marijuana and marijuana concentrate from Bilodeau. I believe the two arranged for a transaction of 10 (likely pounds) of marijuana and a pound of "shatter" (marijuana concentrate).
- c. On February 13, 2018, there was an outgoing message from TT3 to (207) 432-3204 stating, "Nice. Just drove out to Oxford to check on the car wash and drop \$ off for the work on my Lambo. Heading back to the warehouse soon." I believe this message references work on Bilodeau's Lamborghini and his travel back to a marijuana cultivation warehouse.
- d. On February 13, 2018, at 6:27 p.m., there was an incoming message to TT3 from (207) 891-3957 stating, "Hey brian. Its sean gregs son. Is it okay if i help out at cascades

thursday an help get the room trimmed.” I believe this message relates to someone looking for work trimming marijuana plants at the Cascades factory.

75. On about March 15, 2017, Bilodeau bought a new 2016 Lamborghini LP580-2 for \$265,327.47 from a dealership in North Miami Beach, Florida. Bilodeau made a cash down payment in the amount of \$95,500. The finance agreement calls for 84 monthly payments of \$2,671.61.

76. On about June 1, 2015, Bilodeau purchased a black 2014 Nissan GT-R bearing Maine Registration EVILR and VIN number JN1AR5EF9EM271324. The estimated value of this vehicle is \$63,025. There is no known lien on this vehicle.

77. I believe there is probable cause that the 2016 Lamborghini and the 2014 Nissan GT-R represent property bought with proceeds of illegal activity. I therefore seek seizure warrants for these two vehicles.

78. As described in this affidavit, Bilodeau is a long-term member of this organization. I believe this organization has been in existence for multiple years and derives substantial amounts of money from its activities. I also believe that Bilodeau has significant assets, to include high value vehicles. This organization also uses sophisticated means to include LLCs, car dealerships, and third parties to launder its money. I believe Bilodeau’s residence will contain evidence of this organization’s unlawful marijuana activities as well as its money laundering methods and specific instances of money laundering. I also believe based on the above that Bilodeau maintains large amounts of money at his residence.

25 Coyote Lane, Greene, Maine

79. In addition to the information set forth above, I also note the following about 25 Coyote Lane, Greene, Maine, and Danny Bellmore's involvement in marijuana trafficking and money laundering:

- a. Property records show Danny Bellmore and Joanne Bellmore are the listed owners of this property.
- b. I believe this location is Danny Bellmore's residence.
- c. Danny Bellmore has a maroon 2018 GMC Sierra registered in his name with 25 Coyote Lane as the address on the registration.
- d. During the course of this investigation, law enforcement has regularly observed Danny Bellmore and/or his vehicle at the marijuana grow location at 230 Merrow Road in Auburn.
- e. SOI-3 described Danny Bellmore as one of the people – along with Timmy Bellmore, Brian Bilodeau and Jeremy Ciarfella who were present and involved in the initial transaction to convert 230 Merrow Road into a marijuana cultivation location.
- f. As described in this affidavit, Danny Bellmore remains actively involved in a management capacity with marijuana cultivation at 230 Merrow Road.
- g. In addition to his work at 230 Merrow Road, I believe Danny Bellmore also recruits customers for Timmy Bellmore and also remains engaged in Timmy Bellmore's drug organization. For example, agents intercepted the following text message exchange:

Session	Date	Time	Sending Number	Receiving Number	Content
4189	2/16/18	10:19 a.m.	(207) 212-0688	TT2	I've got Dave Hoff out of Ohio looking for purple punch
4193	2/16/18	10:20 a.m.	TT2		Yes
4202	2/16/18	10:21 a.m.	(207) 212-0688	TT2	His father in law sells seeds

h. I believe in these messages, Danny Bellmore tells Timmy Bellmore that he has an out of state customer looking for a particular strain of marijuana.

i. Agents also intercepted the below text messages:

Session	Date	Time	Sending Number	Receiving Number	Content
7165	2/20/18	12:13 p.m.	TT2	(207) 212-0688	Did Brian say anything...I will be over to get those racks
7169	2/20/18	12:15 p.m.		TT2	I texted him yesterday. He said he hopes he has money for us by the end of the week.
7172	2/20/18	12:19 p.m.		TT2	I'm sure the shatter is all gone

j. I believe in these messages, Bellmore asks Danny Bellmore about Brian Bilodeau. I believe Danny Bellmore reported that Bilodeau would have money for Bellmore's drug organization by the end of the week. Bellmore responded that he believed the marijuana concentrate ("shatter") his organization provided to Bilodeau was sold.

k. During the course of the wiretap, agents have intercepted communications about Danny Bellmore's interest in high-value assets to include ownership of LA Strength Club- 41 Chestnut Street Lewiston, a classic Chevrolet Chevelle, and Chevrolet Nova, and a

Dodge Challenger/Demon. Agents also learned that Danny Bellmore owns a recently purchased 2018 GMC Diesel Sierra Denali 2500 (with a lien of unknown amount), a 2006 Harley Davidson (existence of a lien unknown) and a 2016 Harley Davidson (with a lien).

- l. On January 26, 2018, agents observed a text message sent by Danny Bellmore's number to TT2 (this was seized by search warrant and not intercepted over the wiretap) stating, "Scoot offered to take my nova and chevelle to Mecum." Bureau of Motor Vehicle records do not show any Chevrolet Novas or Chevrolet Chevelles registered to Danny Bellmore or JoAnne Bellmore. I therefore believe there is probable cause that Danny Bellmore has assets in the names of third parties.
- m. As described in this affidavit, Danny Bellmore is a long-term member of this organization. I believe this organization has been in existence for multiple years and derives substantial amounts of money from its activities. I also believe that Danny Bellmore has significant assets, to include assets registered or owned in the names of others. This organization also uses sophisticated means to include LLCs, car dealerships, and third parties to launder its money. I believe Danny Bellmore's residence will contain evidence of this organization's unlawful marijuana activities as well as its money laundering methods and specific instances of money laundering.

354 Beech Hill Road, Auburn, Maine

80. In addition to the information set forth above, I also note the following about 354 Beech Hill Road, Auburn, Maine:

- a. 354 Beech Hill Road is Timothy Veilleux's residence.

- b. I believe Veilleux is one of Bellmore's partners with an ownership and managerial role in the conspiracy.
- c. On February 12, 2018, agents intercepted an incoming call to TT2 from (207) 783-2811 (session 2066). During this call, Veilleux commented that Bellmore should see all of Veilleux's gray hairs since he started doing business with Bellmore.
- d. SOI-3 and SOI-5 each identified Veilleux as having a management role in this organization.
- e. Veilleux has a recorded ownership interest in properties located at 1830 Lisbon Street, 17 Bridge Street, 97 4th Street, and 555 Lincoln Street, all of which I believe (for reasons described in this affidavit) house marijuana grows utilized by this organization.
- f. On February 15, 2018, agents intercepted an incoming call to TT2 from (207) 212-2244 (session 3488). During this call, the following discussion occurred between Bellmore and Jeremy Pelletier:

JP: yeah, I get that, just pay cash for whatever you can; electric bills, phone bills, bullshit bills. (voices overlap) Did you pay, Tim, did you tell, pay Veilleux yet?

TB: For what?

JP: I dunno, I'm sure you owe him electricity bill (voices overlap)

TB: I gave him \$30 grand on fucking Monday.

I believe this call relates to Bellmore paying Veilleux \$30,000 of criminally derived income.

- g. On February 20, 2018, agents intercepted an outgoing text message from TT2 to (207) 318-9467 (session 7263). This message stated, "What's our ein #" Agents intercepted a responsive text message from (207) 318-9467 (session 7266) stating, "It's at the office". I

believe this call is Bellmore and Veilleux discussing the Employer Identification Number for Euro Motors.

- h. As described in this affidavit, Veilleux is a partner in this organization. I believe this organization has been in existence for multiple years and derives substantial amounts of money from its activities. I also believe that Veilleux has significant assets, to include ownership in multiple marijuana grow locations. This organization also uses sophisticated means to include LLCs, car dealerships, and third parties to launder its money. I believe Veilleux's residence will contain evidence of this organization's unlawful marijuana activities as well as its money laundering methods and specific instances of money laundering.

1870 Hotel Road, Auburn, Maine

81. In addition to the information set forth above, I also note the following about 1870 Hotel Road, Auburn, Maine:

- a. 1870 Hotel Road, Auburn, Maine is the residence of Mark Kilpatrick.
- b. Based on wire interceptions and surveillance, I believe that Kilpatrick is a middle manager of this conspiracy who is responsible for collection of money, as well as construction and oversight of marijuana grows. I also believe that Kilpatrick maintains a marijuana grow at 1870 Hotel Road.
- c. Kilpatrick has been observed on surveillance during this investigation driving a vehicle registered to Euro Motors.
- d. On January 26, 2018, agents intercepted the following text messages between TT1 (used by Daniels) and TT2 (used by Bellmore):

Session	Date	Time	Sending Number	Receiving Number	Content
57	1/26/18	4:12 p.m.	TT2	TT1	You around
58	1/26/18	4:13 p.m.	TT1	TT2	Absolutely
59	1/26/18	4:14 p.m.	TT1	TT2	Do you want me to head over there
60	1/26/18	4:14 p.m.	TT2	TT1	Lol..ok
61	1/26/18	4:16 p.m.	TT1	TT2	I can leave in 10 minutes
62	1/26/18	4:17 p.m.	TT2	TT1	Mark want be back till 6...i will run over

82. I believe these text messages are drug related. Specifically, I believe the following:

- a. Bellmore asked Daniels if he was around.
- b. Daniels answered in the affirmative and asked if he should meet Belmore.
- c. Bellmore answered in the affirmative.
- d. Daniels stated he could leave in ten minutes.
- e. Bellmore then indicated that "Mark" (believed to be Mark Kilpatrick) would not be back until 6:00 p.m. and Bellmore would then come over to meet Daniels.

83. On January 26, 2018, at 4:17 p.m., agents intercepted an incoming call from TT2 to TT1 (session 63). This call immediately followed the above text message exchange. During this call, the following exchange occurred between Bellmore ("TB") and Daniels ("RD"):

TB: Hello.

RD: Hey.

TB: Yeah, Markey is gonna pick up my truck so he probably won't be back but -- till six. At the shop. So I was gonna go grab that and have you meet him after six.

RD: Yup. Sounds good to me.

TB: So I'll probably be like, give me twenty minutes. I'll be over your house.

RD: Alright, cool.

TB: So, yo, yeah he went to go get my truck in Windham. He left probably left like twenty minutes ago so... I'd say six.

RD: Yeah no problem. That way [U/I] could just head out. I'm still counting the [U/I] things out so... Yeah [Voices overlap].

TB: I'll be thirty minutes, then.

RD: Alright I'll be here.

TB: Okay, bye.

RD: Alright, bye.

84. I believe this call is drug related. Specifically, I believe the following:

- a. Bellmore told Daniels that "Markey" (believed to be Target Subject Mark Kilpatrick based upon surveillance and other interceptions) would pick up Bellmore's truck.
- b. Bellmore indicated he would be over to Daniels's house in twenty minutes to deliver marijuana.
- c. Daniels indicated he was still counting (likely money).
- d. Bellmore indicated he would then come in thirty minutes.

85. On February 24, 2018, agents intercepted a call between TT2 and (207) 281-2812 (session 10216). During this call, Bellmore and Kilpatrick discussed a new grow room and how it would be set up. During this call, Kilpatrick stated, "I spent two grand changing my whole room over last time and Sam can do it in a quarter of the time now." I believe this relates to Kilpatrick altering a marijuana grow to allow Sam (his girlfriend) to clip the room faster. Bellmore then indicated they would need another caretaker license for the new location. Kilpatrick stated that his license was "maxed out." Bellmore responded they would "have to put

another caretaker's license there; that's for sure." I believe this relates to attempting to legitimize this organization's new grow room under the cover of Maine's Medical Marijuana program.

86. During this same call, Bellmore and Kilpatrick continued to discuss establishment of this new grow location and its dimensions. The following exchange occurred:

MK: The only other thing we could do – I could have Sam get hers.

TB: Well, she's the one that's in there all the time so –

MK: Well, because where we live together, we can grow in the same space.

TB: Well, it's stupid for her not to get hers, you know?

...

TB: If she does it now, we have time

MK: I'll have her do it. I'll send it in Monday morning.

...

MK: I'm gonna have to put something at my house, that's all. Cause I'm gonna have to take all of her stuff from there.

TB: Right

MK: I should be all set. I can just put my parents' scripts there

TB: Right

...

MK: I'll just put my dad and Judy's script at my house. It's his house, so it doesn't matter.

TB: Right

MK: I'll just say, "that's theirs." Done. And then I can keep mine and Sam can take hers so we can have our full caretakers with our own script there and then we're covered. We're all set. I've got the 24 and the 12. She's got the 16 and the 9.

TB: Right

MK: And we're fine.

TB: Right. That covers the whole end of the building.

MK: Yep. And then some. We're actually under.

87. I believe this portion of the call relates to an attempt to legitimize the new grow location by providing a correct ratio of caregiver licenses to patients for potential state inspection. I believe this call also indicates the existence of a marijuana grow at Kilpatrick's residence at 1870 Hotel Road. I therefore believe that Kilpatrick's residence will contain evidence of marijuana cultivation and evidence related to this conspiracy.

380 Old Greene Road, Lewiston, Maine

88. In addition to the information set forth above, I also note the following about 380 Old Greene Road, Lewiston, Maine:

89. This is the residence of Greg Pelletier.

90. SOI-5 stated that he/she has personal knowledge that the grow location behind the hospital in Lewiston (consistent with 17 Bridge Street, Lewiston) is facilitated by Greg and Diane Pelletier. SOI-5 told agents that Greg Pelletier purchased a 1969 Chevrolet Camaro with drug proceeds paid to him by Bellmore. SOI-5 further stated that Pelletier also purchased his home with drug proceeds and SOI-5 was present when Pelletier thanked Bellmore for the house. SOI-5 told agents that Bellmore responded, "Now get back to work."

91. Based on the investigation to date, I believe Pelletier is a middle manager of this conspiracy who is responsible for overseeing Bellmore's marijuana grows and transporting money.

92. For example, on February 12, 2018, agents intercepted an incoming call to TT2 from (207) 346-1117 (session 2103). During this call, Bellmore and Pelletier discussed how they smell after being in one of their buildings. Bellmore then stated that he does not like going to the bank and depositing cash when he smells like pot. Pelletier then stated he needed to water his building (believed to be a marijuana grow) and will meet Bellmore afterwards.

93. Later on February 12, 2018, agents intercepted another call between Bellmore and Pelletier. During this call, Bellmore told Pelletier that Pelletier owed him money. Bellmore stated that there was "a dozen diesel and 11.5 bubble kush" and Pelletier owed him money. Bellmore stated the amount was \$30 grand. Bellmore then told Pelletier that's what he gets for not having his "best man" running his room.

94. On February 14, 2108, agents intercepted an outgoing call from TT2 to (207) 577-4166 (session 3038). During this call, Bellmore told Tyler Poland that "some of the rooms are four day rooms ... some are ... they are like Greg's almost a four or five day room. All my Euro stuff is usually a two." I believe in this call, Bellmore is talking about how long it takes to harvest his rooms and compares his grow rooms to Pelletier's grow room.

95. On February 19, 2018, agents intercepted an incoming call to TT2 from (207) 346-1117 (session 6464). During this call, the following exchange occurred between Bellmore and Greg Pelletier:

GP: What the fuck do you want?

TB: I left you money in the fucking 35 plant grow room fucking an hour ago (U/I) I should have had someone steal it.

GP: (U/I)

TB: I left money over there.

GP: Oh Jesus Christ, why didn't you say so I would've answered the phone.

TB: (Laughs) I sat outside the gate for fucking twenty minutes.

GP: (Laughs) You what?

TB: I sat outside the gate twenty minutes, finally went in and didn't want to go into the smelly part so I went in the thirty-five and left the money on that table.

GP:(U/I) look at that what a guy.

TB: (U/I)

GP: (U/I) thirty-eight, forty oh yeah (U/I) yep, oh yeah payroll k (3rd person conversation).

TB: What are you doing there? You hanging out?

GP: I'm fucking trimming.

TB: Why?

GP: Cause I gotta get that room done today...just kept the lights on.

TB: What's that?

GP: I gotta get that one room done today.

TB: (Voice Overlap)

GP: I don't know, Carol's gonna leave at noon so...

TB: For what?

GP: To go run the trimmer.

TB: Oh yeah, yeah, yeah, yeah.

GP: You know what I mean? So I'll trim with them, I'll bring this over, go over, probably come back, trim a little bit more with them, you know.

TB: Alright

GP: Gotta do what you gotta do, you know how it is.

TB: (U/I)

GP: (Laughs) Like an asshole

TB: Alright.

GP: Okay.

96. I believe this call shows Bellmore delivering money to Pelletier for the trimmers' payroll. I further believe that Pelletier tells Bellmore he is trimming marijuana at 17 Bridge Street. Pelletier told Bellmore that "Carole" would be leaving at noon. Agents conducting surveillance identified Carole Theriault leaving 17 Bridge Street at that time.

97. On February 19, 2018, agents intercepted an outgoing call from TT2 to (207) 346-1117 (session 6719). During this call, Pelletier said he was just leaving Euro. Bellmore asked if it was all done. Pelletier answered in the affirmative and said he was cleaning the trimmer. Pelletier confirmed that the trimmers got the whole room done. Pelletier stated they would do the other room tomorrow. I believe this call relates to Pelletier's oversight of the marijuana trimmers at the Euro Motors location.

98. On February 19, 2018, agents intercepted an outgoing call from TT2 to (207) 346-1117 (session 6719). During this call, the following exchange occurred between Bellmore and Pelletier:

TB: What's your wife doing?

GP: She's cleaning the trays over at my place

TB: Whenever she's got extra time – the clones over here –

GP: Yup.

TB: Whatever we can transplant.

GP: Ok.

TB: At Avon I mean.

99. I believe in this portion of the call, Pelletier told Bellmore that his wife (believed based on other interceptions to be a clipper for the Bellmore organization) was cleaning trays containing marijuana clones at 17 Bridge Street. This conversation continued to a discussion of “Coco,” which I believe to be used in transplanting marijuana plants. In the call, Pelletier commented that a store was back ordered. He said the store did not have any “to transplant my 18.” (I believe this is a reference to transplanting Pelletier’s 18 marijuana plants.) Pelletier then told Bellmore the store would get more tomorrow. Bellmore replied, “We’ll take it all.” Pelletier responded that he would call and tell them they wanted “all four pallets.”

100. As described in this affidavit, I believe Kilpatrick is a manager of this organization. I believe this organization has been in existence for multiple years and derives substantial amounts of money from its activities. I believe that Kilpatrick maintains a marijuana grow on behalf of this organization and is trusted to handle some of the organization’s assets. I believe Kilpatrick’s residence will contain evidence of this organization’s unlawful marijuana activities as well as its money laundering methods and specific instances of money laundering.

FURTHER BACKGROUND AND TRAINING AND EXPERIENCE OF AFFIANT

101. Based on my experience, education and training, I know that indoor cultivation of marijuana is a year round activity. A typical grow cycle is about 90 days. Thus, every 90 days,

individuals involved in the indoor cultivation of marijuana can harvest, process and sell marijuana. As such, indoor marijuana grows can generate substantial sums of cash on a regular basis. If the grower staggers different generations of marijuana plants to yield usable marijuana to be harvested, processed and sold at different times, this can generate even larger amounts of cash. Gardening tools and materials are commonly used during the cultivation of marijuana. Other items such as fertilizer, potting soil, pruning shears, scissors and shovels, books, magazines, periodicals containing information needed to become an indoor marijuana grower are often maintained at indoor marijuana grow operations.

102. Large amounts of electrical power are needed in support of indoor marijuana cultivation. If not diverted the electrical billing will show large amounts of power usage. Large amounts of electrical power are consumed, in part, as a result of the use of artificial lighting to simulate natural sunlight. These lights are referred to as "grow lights" and are often 400 watt to 1000-watt metal halide or high-pressure sodium bulbs. In addition, power generators are used to alleviate large electrical usage, and constitute an attempt to avoid being detected by law enforcement officials. Generators also decrease the chance of losing a marijuana crop due to loss of electrical service from the utility company due to weather or other electrical power loss. In addition to using large amounts of electricity, the equipment used by individuals engaged in indoor marijuana cultivation is sources of extreme heat. Because indoor marijuana is best cultivated in warm, but not extremely high temperatures, an indoor cultivation must be vented to allow the heat from the grow lamps to escape and be replaced by ambient air. Indoor marijuana cultivators often use reflective materials to assist in the facilitation of the growing process. The indoor cultivators commonly keep records of their marijuana cultivation and often also have pictures of their marijuana crop.

103. Based upon my training, experience, and the training and experience of other agents with whom I have worked and spoken, I know that:

- a. drug traffickers often store drugs in private places including in their residences and their vehicles;
- b. drug traffickers often possess and store firearms in their residences in order to protect themselves, their supplies of drugs, and/or drug proceeds;
- c. narcotics traffickers must maintain, on hand, large amounts of U.S. Currency in order to maintain and finance their on-going narcotics business;
- d. it is common for narcotics traffickers to maintain books, records, receipts, notes, ledgers, airline tickets, receipts relating to the purchase of financial instruments and or the transfer of funds, and other papers relating to the transportation, ordering, sale and distribution of controlled substances. That the aforementioned books, records, receipts, notes, ledgers, etc., are maintained where the traffickers have ready access to them including their residences and their vehicles;
- e. it is common for drug dealers to secrete contraband, proceeds of drug sales and records of drug transactions in secure locations within their residences, their businesses and/or other locations which they maintain dominion and control over, for ready access and to conceal these items from law enforcement authorities;
- f. narcotics traffickers often purchase and/or title their assets in fictitious names, aliases, or the names of relatives, associates or business entities to avoid detection of these assets by government agencies;
- g. even though these assets are in the names of others, the narcotics traffickers actually own and continue to use these assets, and exercise dominion and control over them;

- h. it is common for persons involved in narcotics trafficking to maintain evidence pertaining to their obtaining, secreting, transfer, concealment and/or expenditure of narcotics proceeds, such as: currency, financial instruments, precious metals and gemstones, electronics, jewelry, books, records, invoices, receipts, records of real estate transactions, bank statements and related records, passbooks, money drafts, letters of credit, money orders, bank drafts, cashiers' checks, bank checks, safe deposit box keys and money wrappers. These items are maintained by the narcotics traffickers within their residences, businesses, vehicles or other locations which they maintain dominion and control over;
- i. when drug traffickers amass significant proceeds from the sale of drugs, they often attempt to legitimize these profits through money laundering activities. To accomplish these goals, drug traffickers utilize, among other mechanisms, domestic and international banks and their attendant accounts, casinos, real estate, shell corporations and business fronts, and otherwise legitimate businesses which generate large quantities of currency. Traffickers often commingle narcotics proceeds with money generated by legitimate businesses;
- j. traffickers commonly maintain books or papers which reflect names, addresses and/or telephone numbers of their associates in the trafficking organization;
- k. traffickers take or cause to be taken photographs of themselves, their associates, and their property. That these traffickers usually maintain these photographs in their possession;
- l. drug traffickers often use electronic equipment such as computers, telex machines, facsimile machines, currency counting machines and telephone answering machines to generate, transfer, count, record and or store information in furtherance of their drug trafficking activities;

- m. drug traffickers often use cellular and/or portable telephones, smart phones, and other electronic equipment and data storage devices in furtherance of their criminal activities;
- n. narcotics traffickers often utilize multiple vehicles in furtherance of their drug trafficking to include rental vehicles and vehicles registered in the names of third parties.

STATUTORY AUTHORITY

104. 21 U.S.C. §§ 841 and 846 makes it a crime to manufacture or distribute marijuana, or conspire to do so (the “specified unlawful activities”).

105. 18 U.S.C. § 1956(c)(7)(B), defines the term “specified unlawful activity” to include “the manufacture ... sale, or distribution of a controlled substance.”

106. 18 U.S.C. § 1956 makes it a crime to, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conduct or attempt to conduct a financial transaction which in fact involves the proceeds of specified unlawful activity, with the intent to promote the carrying on of a specified unlawful activity.

107. 18 U.S.C. § 1957 makes it a crime for parties to “knowingly engage[] or attempt[] to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 [which] is derived from specified unlawful activity.”

108. 21 U.S.C. § 853 subjects to forfeiture for a felony violation of the federal drug laws: (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and (2) any of the person’s property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

109. 18 U.S.C. § 981(a)(1) subject to seizure and civil forfeiture, “[a]ny property, real or personal, involved in a violation of” 18 U.S.C. § 1956 or 1957, and “any property traceable to such property.”

110. 18 U.S.C. § 982(a)(1) subjects to seizure and criminal forfeiture, “[a]ny property, real or personal, involved in a violation of” 18 U.S.C. § 1956 or 1957, and “any property traceable to such property.”

111. 18 U.S.C. § 981(b)(2) provides that the Attorney General may seize property subject to forfeiture under § 981(a)(1) when the Attorney General obtained a warrant “in the same manner as provided for a search warrant under the Federal Rules of Criminal Procedure.

112. 18 U.S.C. § 981(b)(3) provides that, “[n]otwithstanding the provisions of rule 41(a) of the Federal Rules of Criminal Procedure, a seizure warrant may be issued pursuant to this subsection by a judicial officer in any district in which a forfeiture action against the property may be filed under section 1355(b) of title 28, and may be executed in any district in which the property is found”

113. 28 U.S.C. § 1355(b)(1) provides that “[a] forfeiture action or proceeding may be brought in (A) the district court for the district in which any of the acts or omissions giving rise to the forfeiture occurred.”

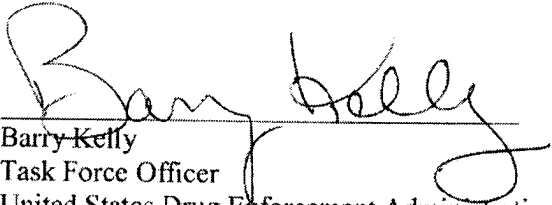
114. Property subject to civil forfeiture may be seized pursuant to 18 U.S.C. § 981(b), and property subject to criminal forfeiture may be seized pursuant to 21 U.S.C. § 853(f). In cases where the Government is not certain at the time of the seizure if it will pursue civil or criminal forfeiture, courts may issue the seizure warrant under both statutes. See *United States v. Lewis*, 2006 WL 1579855, *4 (D. Minn. 2006). The probable cause showing is the same for

Sections 981(b) and 853(f), except that the latter also requires a showing that a restraining order "may not be sufficient to assure the availability of the property for forfeiture."

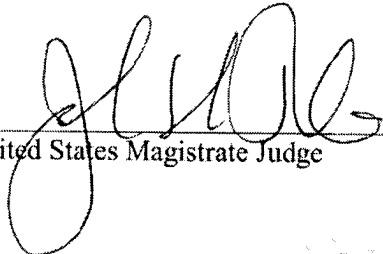
115. An order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the vehicles for forfeiture because the vehicles are in the custody of the targets of the investigation, who cannot reasonably be relied on to abide by an order to maintain the property in substantially the same condition as it is at the present time in order that it will be available for forfeiture.

CONCLUSION

116. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that there exists evidence of a crime at the locations to be searched. Accordingly, the above search warrants are requested. There is also probable cause to believe that two vehicles are subject to seizure. Accordingly, two seizure warrants are requested.


Barry Kelly
Task Force Officer
United States Drug Enforcement Administration

Sworn to before me and subscribed in my presence this 26th day of February, 2018


United States Magistrate Judge

A TRUE COPY
ATTEST: Christa K. Berry, Clerk

By 
Deputy Clerk

EXHIBIT 1

SOI-3 is the seller of both 230 Merrow Road, Auburn, Maine, and 249 Merrow Road, Auburn, Maine. SOI-3 thus has the first-hand information described in this affidavit because he/she personally participated in the real estate transactions described above. SOI-3 received \$200,000 in cash outside of the contract for the purchase and sale of 249 Merrow Road. SOI-3 placed this money in a safe deposit box. Law enforcement expects to commence forfeiture proceedings against this money at the conclusion of this investigation. SOI-3 hopes to receive clean title to 249 Merrow Road at the conclusion of this investigation. Agents believe that SOI-3 received proceeds of criminal activity in connection with the sale of 230 Merrow Road. Law enforcement has not yet sought to forfeit this property or the proceeds received by SOI-3. No promises have been made to SOI-3.