

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of
Parcel Shipped Through the United States Postal Service
and Seized from the Mail Stream on October 3, 2024,
as Further Described in Attachment A
Case No. 2:24-MJ-06221

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

See Attachment A

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

See Attachment B

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

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

The search is related to a violation of:

Table with 2 columns: Code Section, Offense Description. Rows include 21 U.S.C. § 841(a)(1), 21 U.S.C. § 846, and 21 U.S.C. § 843(b).

The application is based on these facts:

See attached Affidavit

- [x] Continued on the attached sheet.

[] Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Jolisia Bennett
Applicant's signature
Jolisia Bennett, U.S. Postal Inspector, U.S. Postal Inspection Service
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

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

Judge's signature
Hon. Alka Sagar, U.S. Magistrate Judge
Printed name and title

City and state: Los Angeles, CA

AUSA: Danbee Kim, x6530

**ATTACHMENT A**

PARCEL TO BE SEARCHED

The USPS Priority Mail Express parcel bearing tracking number EI 973 767 067 US (the SUBJECT PARCEL), detained on October 4, 2024, and currently in the custody of the United States Postal Inspection Service in Los Angeles, California. Weighing approximately 2 pounds, 0 ounces, with a return address of "A. Elhalaha 250 main Street, Spotwood, NJ 08884" and recipient address "Chase Garcia 1739 Vanhorne Lane, Redondo, CA, 90278.

**ATTACHMENT B**

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) (distribution and possession with intent to distribute a controlled substance), 846 (conspiracy to distribute and possess with intent to distribute a controlled substance), and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), namely:

- a. Any controlled substances;
- b. Currency, money orders, bank checks, or similar monetary instruments in quantities over \$1,000; and
- c. Parcel wrappings and any associated packaging material.

**AFFIDAVIT**

I, Jolisia Bennett, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of an application for a warrant to search the United States Priority Mail Express parcel bearing tracking number EI 973 767 067 US (the "SUBJECT PARCEL"), further described in Attachment A, which was shipped through the United States Postal Service ("USPS") and is currently in the custody of United States Postal Inspection Service ("USPIS") in Los Angeles, California, within the Central District of California.

2. The requested warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) (distribution and possession with intent to distribute a controlled substance), 846 (conspiracy to distribute or possess with intent to distribute a controlled substance), and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), as described more fully in Attachment B.

3. Attachments A and B are incorporated by reference herein.

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

## **II. BACKGROUND OF AFFIANT**

5. I am a United States Postal Inspector ("USPI") with the United States Postal Inspection Service ("USPIS") have been employed since August 2021. I have completed a 16-week basic training course in Potomac, Maryland, which included training in the investigation of drug trafficking via the United States Mail. I am currently assigned to the USPIS Los Angeles Division, Contraband Interdiction and Investigations ("CI2") team. The CI2 team is responsible for investigating drug trafficking violations, including those covered under Title 21 of the United States Code (Controlled Substances) involving the United States Mail.

6. The USPIS is the primary investigative arm of the United States Postal Service ("USPS") and is charged under Title 18, United States Code, 3061 with the enforcement of laws governing the use and movement of the United States Mail, including the misuse and fraudulent schemes involving the mail, and crimes relating to mail fraud, drug trafficking and identity theft involving the United States Mail.

7. Since August 2019, I have participated in multiple investigations into violations of the Controlled Substances Act involving the USPS and discussed my investigations with other experienced law enforcement officers. During my employment, I have written affidavits in support of complaints and search warrants, and executed numerous federal arrests, both as part of my own investigations and assisting in other investigations. For these reasons, I am familiar with how drug traffickers use the mail to facilitate their trafficking.

8. Through training, experience, and discussion with fellow United States Postal Inspectors, I am familiar with various methods of smuggling and trafficking controlled substances and the proceeds from sale of such substances.

### **III. SUMMARY OF PROBABLE CAUSE**

9. On October 3, 2024, I flagged the SUBJECT PARCEL for further investigation because it met certain criteria common to

packages containing contraband. For instance, the SUBJECT PARCEL has a handwritten label, and the names of the sender and/or recipient listed do not appear to be associated with the listed recipient and/or sender addresses. Furthermore, a trained drug-detection dog, "Sally," examined the exterior of the SUBJECT PARCEL and gave a positive alert, indicating the presence of either controlled substances or an item that has recently been contaminated with the odor of a controlled substance (such as the proceeds of drug trafficking) inside.

#### **IV. STATEMENT OF PROBABLE CAUSE**

##### **A. Background on Use of Mail for Drug Trafficking**

10. Based on my training and experience, my conversations with other Postal Inspectors who specialize in drug investigations, my review of law enforcement reports, and my own participation in this investigation, I know the following:

11. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send

controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

12. Although Postal Inspectors still see boxes used to send controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

13. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via USPS, and the proceeds from the sale of controlled substances are frequently returned to Los Angeles area via USPS. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in amounts over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of controlled substances because they have been contaminated by or associated with the odor of one or more controlled substances.

14. Drug traffickers often use one of two USPS services: Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the



USPS two-to-three-day delivery mail product. Drug traffickers use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to the intended delivery point. Drug traffickers use the Priority Mail delivery service because it allows drug traffickers more time for travel between states if they decide to follow a shipment to its destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail Express Service.

15. Based on my training and experience, and the collective experiences that my fellow Postal Inspectors who specialize in drug investigations have related to me, I know that the following indicia suggest that a parcel may contain drugs or drug trafficking proceeds:

- a. The parcel is contained in a box, flat cardboard mailer, or Tyvek envelope;
- b. The parcel bears a handwritten label, whether USPS Express Mail or Priority Mail;
- c. The handwritten label on the parcel does not contain a business account number;
- d. All the seams of the parcel are taped or glued shut;

- e. There is no return address;
- f. The listed sender address is a long distance or in a different state from the place where the parcel was actually placed in the mail;
- g. The parcel emits a particular odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and
- h. Multiple parcels are mailed by the same individual, on the same day, from different locations.

16. Parcels exhibiting some of these characteristics are the subject of further investigation, which may include verification of the addressee and return addresses, and examination by a trained drug detection dog.

17. I know from my experience and training that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. Indeed, it is my experience that to the extent real addresses are ever used, it is only to lend an appearance of legitimacy to the parcel and is almost always paired with a false name.

**B. Initial Investigation of the SUBJECT PARCEL**

18. On or about October 3, 2024, the SUBJECT PARCEL located in the Los Angeles area, was identified as meeting some of the initial suspicious characteristics described above during a routine profiling. During the profiling, USPIS identified the SUBJECT PARCEL in the mail stream and detained it for further investigation. Specifically, I determined the SUBJECT PARCEL is a USPS Priority Mail Express parcel bearing tracking number EI 973 767 067 US. The SUBJECT PARCEL has a handwritten label and does not contain a business account. According to CLEAR<sup>1</sup> database records, the return address listed on the SUBJECT PARCEL, "250 main street, Spotwood, NJ, 08884,"<sup>2</sup> does not appear to be associated with the listed sender "A. Elhalaha." The address does appear to be valid. The recipient address listed on the SUBJECT PARCEL, "1739 Vanhorne Lane, Redondo, CA, 90278," does not appear to be associated with the listed recipient "Chase Garcia." The address does appear to be valid.

### **C. Positive Canine Alert**

19. On October 7, 2024, Los Angeles Police Department Officer Jonathan Burgh and his trained drug detection dog, "Sally," examined the exterior of the SUBJECT PARCEL. I learned

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<sup>1</sup>CLEAR is a public information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

<sup>2</sup> Spelling and capitalization are reproduced herein as on the SUBJECT PARCEL.

from Officer Burgh that Sally gave a positive alert to the SUBJECT PARCEL, indicating the presence of controlled substances, which have been recently contaminated with the odor of controlled substances—in the SUBJECT PARCEL.

20. Attached hereto as Exhibit 1 and incorporated by reference is a true and correct copy of an affidavit from Officer Burgh. In this affidavit, Officer Burgh describes his training and experience with drug-detection dogs. He also affirms that Sally is a certified drug-detection dog.

**V. CONCLUSION**

21. For all the reasons described above, there is probable cause to believe that the items listed in Attachment B, which constitute evidence, fruits, and instrumentalities of violations of the Subject Offenses, will be found in the SUBJECT PARCEL, as described in Attachment A.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this \_\_\_\_ day of October, 2024.

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HONORABLE ALKA SAGAR  
UNITED STATES MAGISTRATE JUDGE

# **EXHIBIT 1**

1 Your Affiant is Jonathan Burgh, Serial No. 41147. Your  
2 Affiant has been a Los Angeles Police Officer since August of  
3 2012, and is currently assigned to Gang and Narcotics Division,  
4 K-9 Squad. Your Affiant has attended numerous classes,  
5 seminars, training lectures and on the job training in the field  
6 of narcotics given by other narcotics experts. Your Affiant has  
7 attended and completed the Los Angeles Police Department academy  
8 narcotic training (sales, packaging, usage). I also received  
9 furtherance of this training by attending the California Post  
10 Certified, Los Angeles Police Department 5 Day 40-hour Narcotics  
11 School. Your Affiant has been involved in multiple narcotic  
12 related investigations, which have resulted in the arrest of  
13 suspects for sales, possession for sales, transportation,  
14 possession, and under the influence of controlled substances of  
15 narcotics. Your Affiant has testified in Los Angeles Superior  
16 Court as a court qualified narcotics expert.

17 Your Affiant has previously worked in a narcotics  
18 enforcement detail (NED) unit for over five and a half years, I  
19 have participated in/or assisted in over 200 various narcotic  
20 related arrest/violations, the bulk of which were for possession  
21 and possession for sales of various controlled substances. Your  
22 Affiant has worked under and is currently working under the  
23 direction of senior narcotic enforcement officers. Your Affiant  
24 has observed first hand, the methods used by street dealers and  
25 users in the course of using, buying, selling, transporting,  
26 packaging for sales and sales of narcotics.

27 In January of 2023, your Affiant was assigned to the Gang  
28 and Narcotics Division, K-9 Squad. On February 17<sup>th</sup>, 2023, your

29 Affiant assumed the responsibility of canine Sally, #K9-363, a  
30 LAPD narcotics detection canine. Your Affiant's  
31 responsibilities consist of the care, training and handling of  
32 the canine. Sally has received over (325) hours of training,  
33 during which time she has successfully found over (700) training  
34 aids, which consists of actual narcotics. Sally alerts on the  
35 scent of narcotics, in which she is imprinted on. Her alert  
36 consists of physical and behavioral reactions, which includes a  
37 heightened emotional state in which she focuses (stares) on the  
38 source of the scent and she becomes very possessive of the area.  
39 Sally will positively alert her handler to the scent of heroin,  
40 cocaine (Base and Powder), and methamphetamine.

41 Sally and your Affiant were first certified by the National  
42 Police Canine Association on April 6<sup>th</sup>, 2023. Sally and your  
43 Affiant had their most recent certification by The International  
44 Police Canine Association on September 17<sup>th</sup>, 2024.

45 On **October 7<sup>th</sup>, 2024** your Affiant responded to a request for  
46 a narcotic detection canine. Sally alerted to the scent of  
47 narcotics on or in:

48 **A United Postal Service Priority Mail package with package**  
49 **number(EI-973-767-067-US) at 1055 N. Vignes Street, Los Angeles,**  
50 **California 90012.**

51 I declare under the penalty of perjury that all of the above is  
52 true and correct. Executed at 1:15 PM on the **7<sup>th</sup>** day of **October**  
53 in **Los Angeles** County.



54 Officer Jonathan Burgh #41147

