

UNITED STATES DISTRICT COURT

for the

Eastern District of Kentucky

United States of America)

v.)

Alonso Quane Harrison)

Case No.)

5:22-MJ-5408)

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 1, 2022 in the county of Fayette in the Eastern District of Kentucky, the defendant(s) violated:

Code Section 21 USC 841 Offense Description Possession of 100 grams or more of acetylfentanyl

This criminal complaint is based on these facts:

See affidavit, herein incorporated by reference

Continued on the attached sheet.

/s/ S. Thomas Clements

Complainant's signature

S. Thomas Clements, DEA Task Force Officer

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Criminal. P. 41 transmitted by reliable electronic means (e-mail).

Date: 11/04/2022

Matthew A. Stinnett Judge's signature

City and state: Lexington, Kentucky

Matthew A. Stinnett, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Thomas Clements, being duly sworn, do hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a duly sworn Task Force Officer with the United States Drug Enforcement Administration (DEA), having been assigned in that capacity since January 2020. I am also currently a detective with the Lexington Police Department (LPD) in the Narcotics Enforcement Unit. I have been employed as an officer with the LPD since August 2012. During my tenure with the LPD and DEA, I have participated in investigations involving violations of federal narcotic laws. I have also attended training schools and have been instructed in many aspects of narcotic investigations and am familiar with the narcotic laws promulgated under Title 21 of the United States Code and federal money laundering laws promulgated under Title 18 of the United States Code. I have initiated or participated in surveillance, the operation and debriefing of numerous drug dealers, drug users, and informants, performed both physical and electronic surveillance, executed search warrants, analyzed records documenting the purchase and distribution of illegal drugs, and the concealment of illegal narcotics profits.

2. The information in this Affidavit is based on my personal investigation, as well as information provided to me by other law enforcement officers involved in this investigation, my review of law enforcement reports, and my discussions with other law enforcement agents, confidential sources, and other witnesses. The information contained

in this affidavit does not describe the entirety of this investigation, but sets forth only those facts relevant and necessary to determining probable cause.

3. The investigation to date indicates that there is probable cause to believe that on or about November 1, 2022, in Lexington-Fayette County, in the Eastern District of Kentucky, Alonzo Quante Harrison did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of acetylfentanyl, a fentanyl analogue and schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1). The following facts support the finding of probable cause.

PROBABLE CAUSE

4. In or around October 2022, Detective Charles Johnson (Lexington Police Department) began conducting periodic surveillance of a residence at 1 ■ Strawberry Fields in reference to an ongoing narcotics investigation by the Lexington Police Department. During the surveillance, Detective Johnson (Lexington Police Department) observed Alonzo Quante Harrison coming and going from the residence on multiple occasions. Detective Johnson also observed a vehicle registered (2020 Dodge Ram) to Harrison parked at the residence.

5. On November 1, 2022, members of the Lexington Police Department obtained a state-issued search warrant for the residence at 1 ■ Strawberry Fields Road, Lexington, Fayette County, KY. The search warrant also authorized a search of Harrison's person.

6. On November 1, 2022, Detective Charles Johnson (Lexington Police Department) observed Alonzo Quante Harrison exit the garage at 1 ■ Strawberry Fields

operating a black 2021 Nissan Maxima bearing Kentucky registration plate [REDACTED], which was registered to Harrison.

7. Utilizing electronic surveillance, Detective Charles Johnson was able to locate the listed vehicle being operated by Alonzo Harrison later that same date. A traffic stop was subsequently conducted on Harrison by a marked Lexington Police vehicle. Harrison was detained in reference to the search warrant and a probable cause search of the vehicle was conducted based on the odor of marijuana emanating from inside the vehicle. During the search of the vehicle, investigators located and seized approximately 94.7 grams of suspected marijuana and a key chain that contained two keys for the residence located 1 [REDACTED] Strawberry Fields Road.

8. Upon execution of the search warrant at 1 [REDACTED] Strawberry Fields Road, investigators located and seized two loaded handguns. One handgun, a Glock .40 caliber, was located on the ottoman in the living room. The second handgun, a Springfield 9mm, was located on top of a nightstand in the primary bedroom next to a clear plastic bag that contained approximately three grams of a white powdery substance, suspected to be fentanyl.

9. During a search of the kitchen, investigators located and seized approximately 885 grams of white powdery substance pressed into five separate blocks (each individually wrapped in clear plastic bags), approximately 665 grams of a white powdery substance in two separate clear plastic bags, approximately 206 grams of an off-white powdery substance in a clear bag, approximately 87 grams of suspected cocaine in a clear plastic bag, \$44,280.00 in U.S currency, and a hydraulic press with residue. Also located

in the residence was a lease agreement for 1 ■ Strawberry Fields Road, which showed Alonzo Quante Harrison as the sole person leasing the residence.

10. The Strawberry Fields Road residence has a direct line of sight from the living room into the kitchen. Based on information relayed to your affiant, Harrison was present in the living room when officers recovered the suspected narcotics from the kitchen.

11. After officers recovered the drugs, your affiant advised Harrison that your affiant is a Task Force Officer with the Drug Enforcement Administration. Your affiant further explained that he was present because of narcotics recovered from the residence. After being provided his *Miranda* warnings, Harrison made statements advising that he was the sole resident of 1 ■ Strawberry Fields Road. Harrison stated words to the effect of, this is my doing, this is my property, obviously you all (police) are here for me. Harrison further made statements to the effect of, I have made bad decisions, I will face the consequences for my actions, and I have had plenty of chances to learn.

12. A TruNarc device, which is a handheld mass spectrometer that has been proven to be an accurate field-testing device, was utilized to field-test the seized substances. The aforementioned bag that contained approximately 87 grams of a white powdery substance returned positive for cocaine HCl. The five aforementioned 885 grams of white powder substances in block form were also tested using the TruNarc device. One block (approximately 135 grams) tested positive for acetylfentanyl, three of the blocks returned inconclusive results, and the fifth block tested positive for mannitol. From training and experience, your affiant knows that mannitol powder is commonly used as a cutting agent by narcotics traffickers to add weight and increase the quantity of

narcotics for re-distribution. Two clear bags containing a white powdery substance with a total approximate weight of 665 grams also resulted in an inconclusive result. It is your affiant's belief, based on training and experience, that each of five white powder blocks contains an analogue of fentanyl. Your affiant is aware that inconclusive results provided by the TruNarc device have routinely resulted in the identification of a fentanyl analogue through further laboratory testing. The inconclusive results seem to occur when the fentanyl analogue has been mixed with an additional substance or the analogue has not been preprogrammed into the TruNarc system for detection.

13. A search of court records indicate Alonzo Quante Harrison was convicted of felony offenses on March 3, 2011, in court case number 10-CR-01218, and on December 20, 2018, in court case number 17-CR-01245, both occurring in the Commonwealth of Kentucky, which prohibits him from possessing a firearm.

CONCLUSION

14. Based on the discovery of the approximately 1,550 grams of suspected fentanyl analogue in the possession of Harrison, with approximately 135 grams that field tested positive for the presence of acetylfentanyl, and the additional facts set forth herein, I believe there is probable cause that on or about November 1, 2022, in Fayette County, located within the Eastern District of Kentucky, Alonzo Quante Harrison did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of acetylfentanyl, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

I declare under the penalty of perjury that the above-statement is true and correct to the best of my knowledge, information, and belief.

/s/ S. Thomas Clements

S. Thomas Clements, Task Force Officer
Drug Enforcement Administration

Attested to by applicant per FRCP 4.1 by reliable electronic means on this 4th day of November, 2022.


Matthew A. Stinnett
MATTHEW A. STINNETT
U.S. MAGISTRATE JUDGE