

Affidavit for Search Warrant

United States District Court
FOR THE
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

vs.

60 Plymouth Circle

Daly City, California

BEFORE U.S. MAGISTRATE OWEN E. WOODRUFF, 450 GOLDEN GATE, SAN FRANCISCO, CA

The undersigned being duly sworn deposes and says:

That he has a reason to believe that (on the premises known as) 60 Plymouth Circle,

Daly City, California, a two story wood frame residence being light

green in color with dark green trim and having the numerals 60

attached to the front of the residence to the left of the double

garage doors.

there is now being concealed certain property, namely

in the Northern District of California 1) Narcotics and narcotic para-

phernalia 2) Records and documents pertaining to narcotic transactions

3) All documents relating to cocaine trafficking 4) All proceeds includ-

ing monies, valuables and anything else believed to be the fruits of

narcotics trafficking.

which are the fruits and instruments of a violation of 21 USC 841(a)(1)

And that the facts tending to establish the foregoing grounds for issuance of a Search Warrant

are as follows:

(SEE ATTACHED AFFIDAVIT)

AFFIDAVIT

I, Sandra C. Smith, having duly sworn, depose and state that I am a Special Agent

of the Drug Enforcement Administration, US Department of Justice, and have been

so employed for approximately 7 1/2 years. I am familiar with the facts as set

forth below due to my personal observations or the observations of other law

enforcement agents and officers who will have related those circumstances to me.

1. The Drug Enforcement Administration has developed information over the past several years that the MENESES Family has been involved in smuggling and distribution of cocaine in the San Francisco Bay area.
2. In April 1978, the FBI reported that Nowin and Ernest MENESES were smuggling 20 kilos of cocaine at a time into the United States. The same report stated that the cocaine was distributed in San Francisco by Hymen MENESES.
3. In May of 1978, SR3780016 stated that Jaime MENESES received shipments of cocaine approximately every two months.
4. In August 1978, Lauren LACAYO-VAISMAN was arrested in Panama City in possession of one kilogram of cocaine. LACAYO stated that a Mr. MENESES financed the smuggling venture.
5. New Orleans District Office of DEA in 1979 conducted Operation Alligator in which a number of persons were indicted for cocaine smuggling. "Operation Alligator" resulted in the indictment of numerous persons for smuggling cocaine. It was determined that Norwin MENESES was a source of supply for this group. Manuel PORRO advised S/A Bill Cunningham that he had given Norwin MENESES money for cocaine and that he had helped Norwin MENESES smuggle cocaine.
6. In June 1980 the San Francisco District Office of DEA received a telephone call from an identified individual who stated that cocaine seized from Francisco LOBOS in Tampa, Florida, in February, 1980, was destined for Jaime MENESES. This same caller stated that Jairo MENESES had gone to Costa Rica to obtain approximately seven pounds of cocaine.
7. In June 1980, San Francisco Police Department arrested several individuals including Omar Tony MENESES for the sale of cocaine in Donati's Bar, 5740 Mission St., San Francisco. At that time, Donati's Bar was owned by Jaime MENESES.
8. In July 1980, a search warrant was served on the residence occupied by Roger MENESES at 171 Glenbrook Lane in San Bruno, which resulted in the seizure of approximately 20 pounds of cocaine and \$8,817.00. Roger MENESES and Carolyn CALDERA were arrested at that address. July 7, 1980, Omar Tony MENESES was arrested by the San Bruno Police Department in possession of one-quarter pound of

cocaine which was found in his vehicle.

9. Carolyn CALDERA was arrested on May 5, 1977, at the Los Angeles International Airport in possession of 3.6 pounds of cocaine that was being smuggled into the United States from Peru. Roger MENESES was on the same flight as CALDERA.

10. In August 1980, an anonymous caller telephoned the San Francisco District office of DEA and advised that Norwin MENESES was the financier for the MENESES Organization.

11. During the early part of June 1981, Detective Joseph Lee of the Baldwin Park Police Department was contacted by a confidential informant who advised that Julio BERMUDEZ of West Covina, California, is a large cocaine dealer that makes two trips per month to the San Francisco Area where he contacts a large cocaine smuggling organization headed by Norwin MENESES. The confidential informant advised that BERMUDEZ picks up 14 to 20 pounds of cocaine on each trip.

12. A second confidential informant corroborated the information supplied to Detective Joseph Lee and stated that Julio BERMUDEZ places his order by telephone prior to traveling to & San Francisco, California.

13. In October 1981, a search warrant was obtained for telephone toll calls for telephone number (213) 338-5208, the residence of Julio BERMUDEZ. Telephone number (213) 338-5208 is listed to Patricia BARRETO. These toll records indicated that during the months of August, September, and October 1981, 22 telephone calls, 15 telephone calls, and 14 telephone calls, respectively, were made to telephone number (415) 992-5631, listed to Jairo MENESES at 60 Plymouth Circle, Daly City, CA.

14. In October 1981, surveillance was initiated at 1128 Greendale St. in West Covina, CA, by Baldwin Park Police, Los Angeles County Sheriff's Department and United States Customs. On November 12, 1981, surveilling officers observed Julio BERMUDEZ leave his residence at 1128 Greendale St. in West Covina, CA, with a small beige suitcase, and enter a 1972 Buick, California license #389FAI. BERMUDEZ subsequently picked up a passenger, Jose HERRERA, and the two individuals proceeded to Los Angeles International Airport.

15. BERMUDEZ, carrying the above described suitcase, accompanied by HERRERA, purchased two one-way tickets to San Francisco, CA on PSA Flight #425.

and HERRERA subsequently boarded Flight #425 and arrived at San Francisco International Airport at approximately 3:40pm. They were observed by your affiant to enter a 1979 gold Toyota bearing California license. #1AOA407 registered to Jose HERRERA, 9303 Elm Vista Drive in Downey, CA. The Toyota driven by a Latin male adult, proceeded to 8 Bellevue St. in Daly City, CA.

16. At 4:10pm, Deputy John Austin observed BERMUDEZ exit 8 Bellevue in Daly City and remove the small beige suitcase from the trunk of the Toyota and place it behind the driver's seat. BERMUDEZ slowly drove the vehicle away from the location, driving in a definite counter surveillance manner; i.e., recessive speed, rapid lane changing, exiting and returning to the freeway, and U-Turns. The vehicle was lost in the area of Freeway 280 and Sneath Lane.

17. At approximately 4:45pm, your affiant located the vehicle parked in the driveway at 60 Plymouth Circle, Daly City. This is the address of Jairo MENESES, a known member of the MENESES Organization and known cocaine trafficker.

18. At approximately 6:35pm, BERMUDEZ, driving the gold Toyota, left 60 Plymouth Circle, in Daly City, and was surveilled back to 8 Bellevue in Daly City. The gold Toyota was subsequently lost from view.

19. On November 16, 1981, your affiant was advised by Detective Joseph Lee that Julio BERMUDEZ returned to his residence at 1128 Greendale St. in West Covina, CA, at approximately 7:00pm, November 14, 1981. Shortly thereafter, a search warrant was served on 1128 Greendale St. in West Covina, resulting in the seizure of approximately three pounds of cocaine and \$17,000. A ledger was also seized which bore the entry "11-11-81 \$90,000 to Jairo."

Sworn to and subscribed to by me on November 16, 1981, at San Francisco, CA.

Sandra Smith, Special Agent

11-16-81

Owen Woodruff

United States Magistrate

Northern District of California

11-16-81

5:00pm

United States District Court

FOR THE

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

vs.

60 Plymouth Circle

Daly City, Calif.

To Any Special Agent of the Drug Enforcement Administration or other
authorized person

Affidavit(s) having been made before me by S/A Sandra Smith

that he has reason to believe that on the premises known as 60 Plymouth Circle,

Daly City, California, a two story wood frame residence being light

green in color with dark green trim and having the numerals 60 attached

to the front of the residence to the left of the double garage doors.

there is now being concealed certain property, namely

in the Northern District of California

1) Narcotics and narcotic para-

phernalia 2) Records and documents pertaining to narcotic transactions

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including monies, valuables and anything else believed to be the

fruits of narcotics trafficking.

and as I am satisfied that there is probable cause to believe that the property so described is being

concealed on the person or premises above described and that grounds for application for issuance of the

search warrant exist as stated in the supporting affidavit(s).

You are hereby commanded to search within a period of 10 days

(not to exceed 10 days) the person or place named for the property specified, serving this warrant

and making the search [INFORMATION BLACKED OUT] and if the property be found

there to seize it, leaving a copy of this warrant and receipt for the property taken, and prepare a written

inventory of the property seized and promptly return this warrant and bring the property before

OWEN WOODRUFF as required by law.

Owen Woodruff

United States Magistrate

I received the attached search warrant November 16, 1981, and have executed it as follows:

On November 16, 1981 at 6:45 o'clock PM, I searched the person or premises described in the warrant and

I left a copy of the warrant with at the place of search together with a receipt for the items seized.

The following is an inventory of property taken pursuant to the warrant:

Miscellaneous papers, address books and photographs and passports

Smith & Wesson .22-cal. pistol, Serial #31827

Remington 12-guage shotgun, Serial #N404653V and ammunition

OHaus Triple Beam Balance

Plastic bag containg Thai sticks

Envelope containing \$9,000.00

This inventory was made in the presence of

Saverio Weidl and Clark Edwards

I swear that this Inventory is a true and detailed account of all the property taken by me on the warrant.

SANDRA C. SMITH

Subscribed and sworn to and returned before me this 24th day of November, 1981.

OWEN E. WOODRUFF