

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of Vermont

United States of America

v.

Heather Megaro

*Defendant(s)*

Case No.

2:22-MJ-25-1

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2022 MAR 11 PM 4:35

CLERK

BY

DEPUTY CLERK

## CRIMINAL COMPLAINT

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

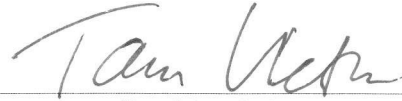
On or about the date(s) of March 4, 2022 in the county of Caledonia in the  
District of Vermont, the defendant(s) violated:*Code Section*

18 U.S.C. § 922(g)(3)

*Offense Description*Knowingly possessed a firearm, in or affecting interstate or foreign  
commerce, knowing she was a user of, or addicted to, controlled substances

This criminal complaint is based on these facts:

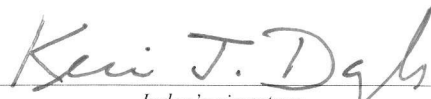
See Affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

ATF Special Agent Tam Vieth

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 03/11/2022City and state: Burlington, Vermont*Judge's signature*

Kevin J. Doyle, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT

I, Tam Vieth, being sworn, depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since May of 2014. As a Special Agent with ATF, I am familiar with federal laws relating to firearms and controlled substances, have been trained in the investigation of violations of said laws, and have participated in such investigations. During my law enforcement career, I have worked on numerous drug and narcotics investigations, and am familiar with criminal use, possession, sale, and trafficking of illegal drugs.

2. I set forth the following to demonstrate probable cause to believe that on or about March 4, 2022, Heather Megaro, knowingly possessed a firearm, in or affecting interstate or foreign commerce, knowing she was a user of, or addicted to, controlled substances, a violation of 18 U.S.C. § 922(g)(3).

3. This affidavit is based upon my training and experience, and the investigation of other law enforcement officers. More specifically, I know the information contained within this affidavit from reviewing reports drafted by the Vermont State Police (VSP) as well as conversations with members of the VSP Major Crime Unit and the Vermont Drug Task Force. I have reviewed each report mentioned in this affidavit. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not set forth each fact learned by law enforcement during the course of the investigation. Where I describe a statement, it is described in substance, not verbatim.

VSP Shooting Investigation

4. On March 4, 2022, I was contacted by the VSP Major Crime Unit with a request to provide assistance with their fatal shooting investigation that occurred on March 1, 2022 outside of Northeastern Vermont Regional Hospital. The following information has been provided to me by VSP Det. Sgt. James Vooris and/or Det. Lt. Todd Baxter.

5. On March 4, 2022, Det. Lt. Todd Baxter met with Casandra Rich. Rich stated on the day of the homicide of Vincent Keithan, during the early morning hours, she and her boyfriend Ryan Hill had gone to Allie's house on Jills Hill Road to buy crack cocaine and heroin. Allie is believed to be Allison Roslund and is known to reside at 45 Jills Hill Road in Wheelock, Vermont. While at the Jills Hill Road residence, Rich learned that there was an ongoing issue with Jerry "Mike" Ramirez, Ashley Lee, Vincent Keithan, and Allison "Allie" Roslund.

6. Rich informed Det. Lt. Baxter that she knows Mike's real name is Jerry Ramirez because she has purchased crack and heroin from him many times and has used his Cash app to pay him. Cash app is a payment app that is connected to checking accounts. Rich stated when using the cash app to pay Mike for drugs purchased, she observed Jerry Ramirez as being the name associated with the account.

7. Rich advised she was in Mike's Jeep with Mike, Ryan Hill and Emily Lussier when they stopped at Heather Megaro's trailer in Lyndonville. While at the residence they met with Black and Megaro. Law enforcement believes Black is Shawn Gadsden. Rich informed Det. Lt. Baxter that the group, which included Megaro, smoked crack cocaine while at Megaro's residence. Rich stated everyone was doing drugs and that a guy by the name of Alby was also at the residence to purchase drugs.

8. Rich stated she has been to Megaro's trailer in the past to purchase crack cocaine from Black. Rich stated she has personally purchased crack cocaine from Black in the past and knows he was currently and as recently as March 1, 2022, selling drugs from Megaro's trailer.

9. Rich told Det. Lt. Baxter that while at Megaro's trailer, Rich observed Mike with a small handgun and an AR style rifle. Rich stated that Mike retrieved the guns from Megaro's bedroom. Mike took the two guns with him and continued the search for Ashley Lee. Rich stated she left Megaro's residence with Mike and they traveled to Vincent Keithan's residence in Saint Johnsbury, Vermont. While at Keithan's residence, Mike broke the windows of Vincent's truck with the gun. The group later returned to Megaro's residence.

10. Rich stated Mike, Black, Emily Lussier and Ryan Hill left the residence in Mike's Jeep. Rich stated they all later returned with Ashley Lee. When they entered the residence, Mike and Black went directly into Megaro's room with Megaro.

11. Rich stated prior to leaving Megaro's residence, Megaro asked Hill and Rich if they could get rid of a gun. Rich stated Megaro handed her a small, silver .22 caliber handgun that was dipped in alcohol. Rich stated she agreed to take the gun. Megaro handed Rich the handgun in a blue plastic bag. Rich stated she left with the handgun.

12. Rich was asked about the AR rifle. Rich stated that she didn't know about the AR rifle and that Megaro did not ask her to take the rifle. Rich stated the handgun which she obtained from Megaro was currently located in her black purse located at Hill's camper trailer at 1695 Rt 14, Calais, VT.

13. On March 4, 2022, VSP obtained and executed a state search warrant on the camper trailer located at 1695 Rt 14 in Calais, Vermont. Upon execution of this warrant, a .22 caliber rim fire Harrison and Richardson Arms revolver was located inside a black purse in the

camper trailer. The firearm has the words, “Worcester Mass” engraved on it.



14. On March 4, 2022, VSP obtained and executed a search warrant on the residence of Heather Megaro, located at 800 Lily Pond Road, Lyndonville, VT. Upon the search of this residence, law enforcement located multiple firearms concealed in a closet, in the bedroom at the end of residence. This bedroom also had an attached master bathroom.

15. Megaro described her bedroom as being at the end of the trailer with the attached bathroom. This is the location where the guns were located. VSP personnel also observed multiple photos of Megaro in this bedroom as well.

16. Megaro's bedroom and bathroom contained drug paraphernalia including, hypodermic needles, choirboy, crack pipes, scales, empty glassine bags, and a white powdery substance. During execution of the warrant at Lily Pond Road, VSP seized: 6.5 grams of a solid tan chalky substance, weighed without packaging, which presumptively tested positive for fentanyl; 1.8 grams, in packaging, of a white powder, which presumptively tested positive for heroin; 0.4 grams in packaging of a white crystalline powder, which also presumptively tested positive for cocaine.

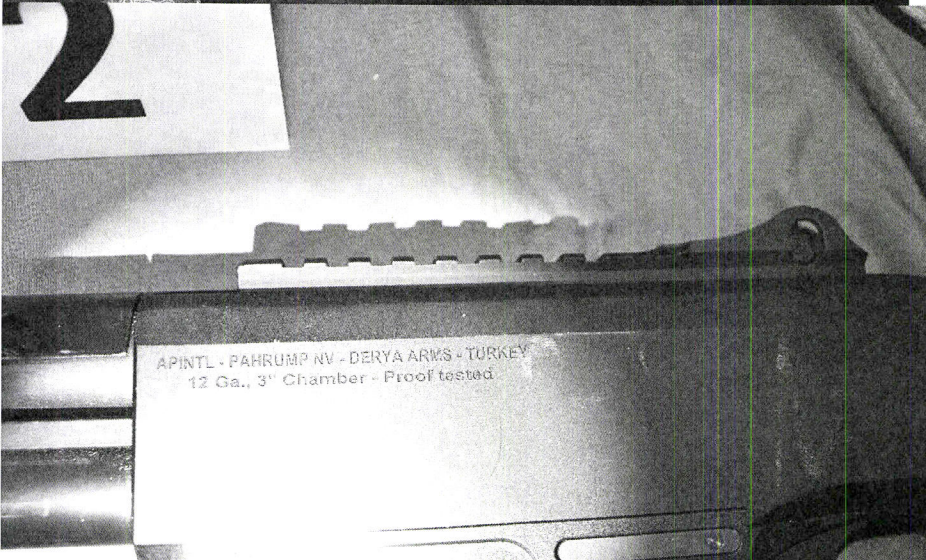
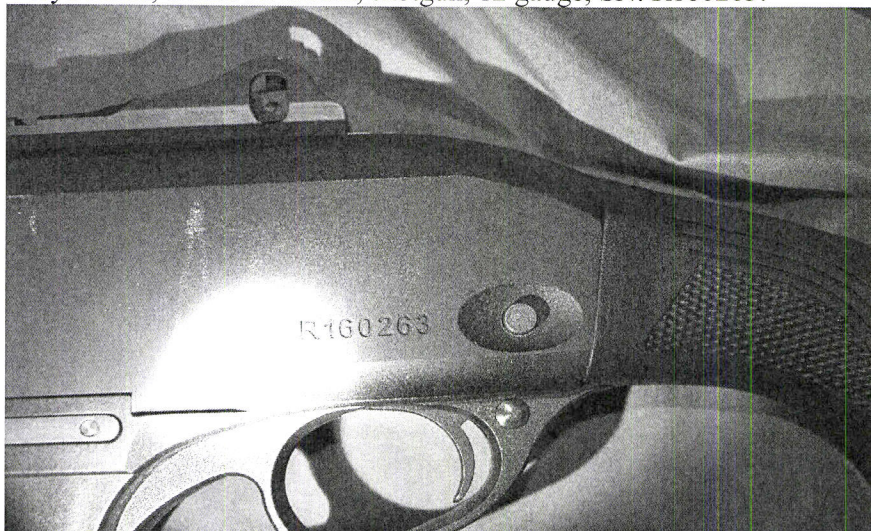
17. The only other bedroom in the residence appeared to be the bedroom of Megaro's juvenile daughter and Megaro and her juvenile daughter were the only individuals present at the time of the search warrant execution.

18. Among the other firearms seized from Megaro's residence and in custody by VSP were the following:

- Unknown make, unknown model, rifle, .223 caliber, unknown serial number.



- Derya Arms, unknown model, shotgun, 12 gauge, SN: R160263.



19. On March 7, 2022, Det. Lt. Baxter conducted a follow up interview with Casandra Rich at the Hardwick Police Department. Rich informed Det. Lt. Baxter that on the morning of March 1, 2022, prior to the homicide of Vincent Keithan, she was at Megaro's trailer with Mike, Black, Emily Lussier, Ryan Hill and Megaro. While at the trailer, Emily purchased crack cocaine from Black and shared hits of the crack cocaine with Megaro, Ryan and herself.

20. On March 10, 2022, Det. Sgt. James Vooris spoke with Melinda McClintock on the phone. During this phone call, McClintock confirmed she knew a female named Heather who resides in a trailer on Lily Pond Road in Lyndonville, Vermont. Det. Sgt. Vooris asked McClintock if she knew Megaro to be a drug user and she advised she did. McClintock stated Megaro uses heroin/fentanyl as well as crack cocaine. McClintock advised she has not witnessed Megaro use heroin/fentanyl and was not certain how she uses it (whether she smokes or injects), however she has seen Megaro nodding off from presumptive drug use. McClintock stated she has observed Megaro smoke crack cocaine approximately 10 times. McClintock also described an incident that occurred in early February 2022. McClintock owed a person named "Tony" money and McClintock agreed to meet Tony in Saint Johnsbury. McClintock stated Megaro drove Tony to the meeting, and she observed Megaro smoking crack cocaine in the vehicle.

21. On March 10, 2022, Det. Sgt. James Vooris spoke with Eli Farrington on the phone. This call was audio recorded. During the call, Farrington stated he knew a women named Heather Megaro who resided in Lyndonville, and they have been friends for years. During the conversation with Farrington, he advised that one of Mike's partners, who he knew as "Black," was selling controlled substances from Megaro's residence. Farrington also stated that Megaro uses heroin and crack cocaine and he last observed Megaro use heroin and crack cocaine approximately 6 weeks ago when he was at Megaro's house.

22. Based on my training and experience, I know that crack cocaine is a schedule II controlled substance, categorized as having a high potential for abuse. From my training and experience, I am aware that as a user of controlled substances, Megaro is prohibited from purchasing, possessing or owning firearms or ammunition.

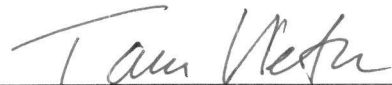
Interstate Nexus Determination

23. As part of this investigation, ATF SA Eric Brimo, a designated ATF interstate nexus expert, reviewed the firearms recovered from Megaro's residence. SA Brimo advised that among the recovered firearms from Megaro's possession, the Derya Arms, unknown model, shotgun, 12 gauge, bearing serial number R160263, was manufactured outside the State of Vermont. This means that the firearm previously traveled in interstate commerce and therefore its presence in Vermont affected interstate commerce.

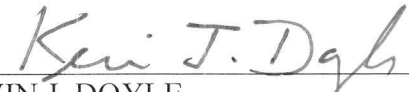
Conclusion

24. Based on the information set forth above, I believe there is probable cause that on or about March 4, 2022, Heather Megaro knowingly possessed a firearm, namely a Derya Arms, unknown model, shotgun, 12 gauge, bearing serial number R160263, in or affecting interstate or foreign commerce, as a knowing user of controlled substances, in violation of Title 18, United States Code, Section 922(g)(3).

Dated at Burlington, in the District of Vermont, this 11<sup>th</sup> day of March 2022.

  
TAM VIETH  
Special Agent, ATF

Sworn to and subscribed before me this 11<sup>th</sup> day of March 2022.

  
KEVIN J. DOYLE  
United States Magistrate Judge