

UNITED STATES DISTRICT COURT

for the

District of Puerto Rico

United States of America

v.

[1] LUIS NOMAR ISAAC SANCHEZ
 [2] JOSHUA ENRIQUE BULA CARTAGENA
 [3] KEVIN MANUEL BONILLA RAMIREZ
 [4] ELI YANIEL COUVERTIER POLLOCK

Case No. 24-MJ-314

Defendant(s)

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 October 31, 2023 in the county of - in the
- District of Puerto Rico, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §922(o) & 18 U.S.C. §2
 [1]-[4]

Possession of a machinegun; Aiding and abetting

This criminal complaint is based on these facts:

See attached affidavit. The government requests detention.
 Reviewed by AUSA Laura Díaz-González.

☒ Continued on the attached sheet.

MICHAEL S VILLANUEVA
 ACEVEDO

Digitally signed by MICHAEL S
 VILLANUEVA ACEVEDO
 Date: 2024.03.29 18:33:26
 -04'00'

Michael Villanueva

Complainant's signature

Michael Villanueva, HSI Special Agent

Printed name and title

Sworn by telephone pursuant to Fed. R. Crim. P. 4.1 on this 29th day of March, 2024 at 7:05 p.m..Date: 03/29/2024


Hon. Bruce J.
 McGiverin

Judge's signature

City and state: San Juan, Puerto Rico

Hon. Bruce McGiverin, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Michael Villanueva Acevedo, a Special Agent with the Department of Homeland Security Investigations, hereinafter referred to as HSI, being duly sworn, depose and state as follows:

BACKGROUND

1. I am a Special Agent of the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), San Juan, Puerto Rico and have been so employed since 2022. I am an investigative or law enforcement officer of the United States who is empowered to conduct investigations of or to make arrests for offenses enumerated in 18 U.S.C. § 2516. As a Special Agent, my responsibilities include conducting investigations of the alleged manufacture, distribution and possession of controlled substances, importation of controlled substances, smuggling of goods into the United States, firearm's violations, and other related offenses.
2. I have attended the Homeland Security Investigations Special Agent Training (HSISAT) at the Federal Law Enforcement Training Center in Glynco, Georgia. I was trained in conducting investigations related to general violations and narcotics smuggling, which includes distribution activities where investigations commonly conducted are related to violations of Titles 8, 18, 19, 21 and 31 of the United States Code (USC). I have had approximately 600 hours of training by the Georgia Peace Officer Standards and Training Council (POST). I am a graduate of Savannah State University with a Bachelor of Science in Criminal Justice. I served as a Police Officer with the Savannah Police Department for approximately three years. I have participated in the execution of numerous search/arrest

warrants throughout the city of Savannah, Georgia and as a result, have participated in the seizure of evidence to include firearms and narcotics.

3. Because this affidavit is submitted for the limited purpose of establishing probable cause justifying the issuance of an arrest warrant, I have not included details of every aspect of this investigation. I am thoroughly familiar with the information contained in this Affidavit, either through personal investigation or through discussions with other law enforcement officers who have interviewed individuals or personally have obtained information, which they in turn have reported to me.
4. The facts and information contained in this affidavit are based on my personal knowledge, as well as upon information received in my official capacity from other individuals, including other federal, state, and local law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint charging Luis Nomar ISAAC Sanchez, Joshua Enrique BULA Cartagena, Kevin Manuel BONILLA Ramirez, and Eli Yaniel COUVERTIER Pollock with violating 18 U.S.C. § 922(o)–possession of a machinegun and 18 U.S.C. § 2 aiding and abetting. I have set forth only the facts that I believe are necessary to establish probable cause to support this criminal complaint.

Facts In Support of Probable Cause For Criminal Complaint

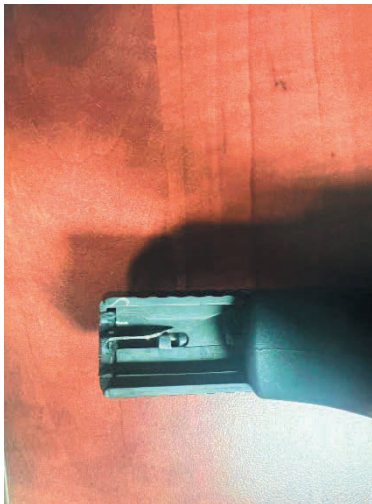
5. On October 31, 2023, at approximately 0610 hours the Puerto Rico Police Bureau (PRPB) San Juan Intelligence Unit was operating in the Barrio Obrero area of San Juan; specifically, on Tito Rodriguez street. While the intelligence unit was conducting their operations, one of the agents observed an individual later identified as Luis Nomar ISAAC Sanchez Also Known As (AKA) “cdobleto” walking towards a red 2016 Jeep Grand

Cherokee SRT-8 PR tag (IUV286) along with three other individuals. The Cherokee was parked in the street. PRPB agents had received information that the Cherokee's occupants were in possession of firearms. The PRPB agent saw an extended magazine loaded into the magazine well of a black pistol protruding from the front of ISAAC's waistband. They watched as ISAAC entered the vehicle through the driver's side. The other three individuals also got into the vehicle. As soon as the subjects got inside of the vehicle, PRPB units boxed the vehicle in and were able to take the other three individuals into custody. The individuals were later identified as Joshua Enrique BULA Cartagena (passenger side rear), Kevin Manuel BONILLA Ramirez (front passenger), and Eli Yaniel COUVERTIER Pollock (driver side rear passenger). ISAAC fled from the scene on foot, leading officers on a foot chase. The PRPB agent stated that he could see that ISAAC still had the firearm on his person when he got out of the vehicle, and that ISAAC was gripping the pistol. About ten minutes later, a PRPB agent found ISAAC on top of a nearby roof with residence number 431. The agent apprehended ISAAC on the roof.

6. After PRPB agents had all the subjects in custody, agents were able to see a pistol grip with an extended magazine tilted to the driver side of the vehicle where ISAAC was sitting. The barrel of the pistol was pointing towards the hood of the vehicle. Agents applied for and received a state search warrant of the vehicle.
7. At approximately 1830 hours that same day, the PRPB agents executed the search warrant in the Hato Rey West precinct where the vehicle was held. HSI agents were present during the execution of the warrant. While waiting for the execution, PRPB agents were interviewed about the incident.

8. Inside the center console of the vehicle which was open-- the agents found a black Glock model 19 (BNZC201) pistol which appeared to be modified with a chip to fire fully automatic. On the passenger side rear of the vehicle, there was a black Glock model 19 pistol (BVUL510) with a weapon light attachment and a red dot sight where BULA was sitting. The pistol was tucked in underneath the seat and the barrel of the weapon was facing the passenger rear doorway. Upon completion of the execution of the search warrant, all subjects were transported to PRPB Headquarters for processing.
9. In summary, during the execution of the search warrant, PRPB agents found the following inside the vehicle:

- a. one (1) Glock, model 19, .9mm caliber, black in color bearing serial number: BNZC201. This firearm contained an alteration chip, that based on my experience modified the firearm to fire automatically, more than one shot, with a single pull of the trigger. The modification to the firearm is visible and the backplate of the firearm is not an original equipment manufacturer Glock backplate. See picture below.



- b. one (1) Glock, model 19, .9mm caliber, black in color bearing serial number: BVUL510

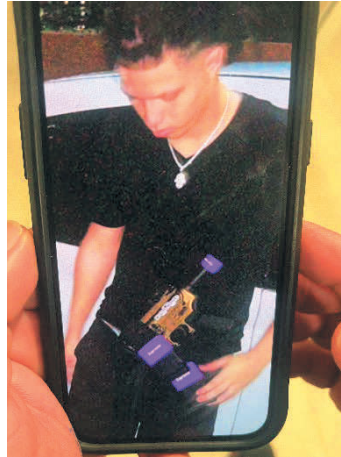
- c. four (4) .9mm magazines
- d. sixty-one (61) rounds of 9mm ammunition

10. On that same day, HSI agents arrived at the PRPB Headquarters building and interviewed PRPD San Juan intelligence officers about the events mentioned on paragraphs 5-9. HSI agents spoke with each subject, and all declined to speak. However, each of them voluntarily signed a consent to search each of their respective cell phones. During a preliminary search of the cell phones, agents were able to see pictures of ISAAC, BULA, and COUVERTIER holding various rifles and pistols. Below you will see pictures of the weapons found in the Jeep and of the subjects holding firearms.

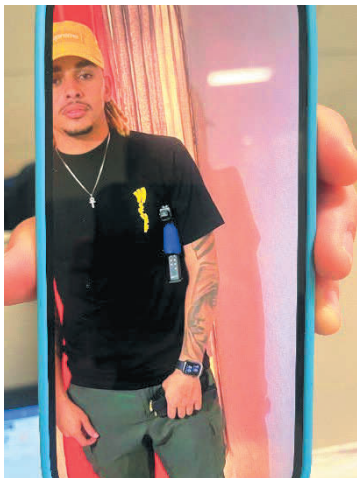
The pictures below were taken the day of the intervention. From left to right, the first two pictures are of the SN# BNZC201 Glock Model 19 modified to fire fully automatic. The third picture is of the pistol which was found on the rear passenger side of the vehicle.



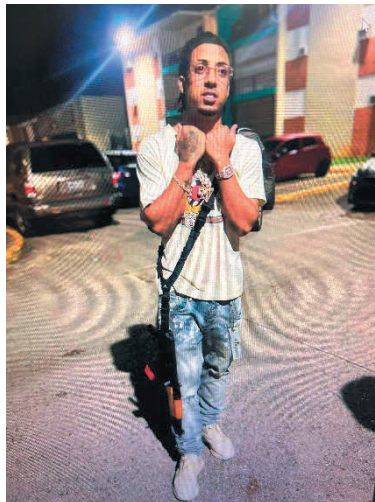
The following pictures will show BULA holding firearms. These pictures were obtained through a preliminary consent search of BULA'S cellphone.



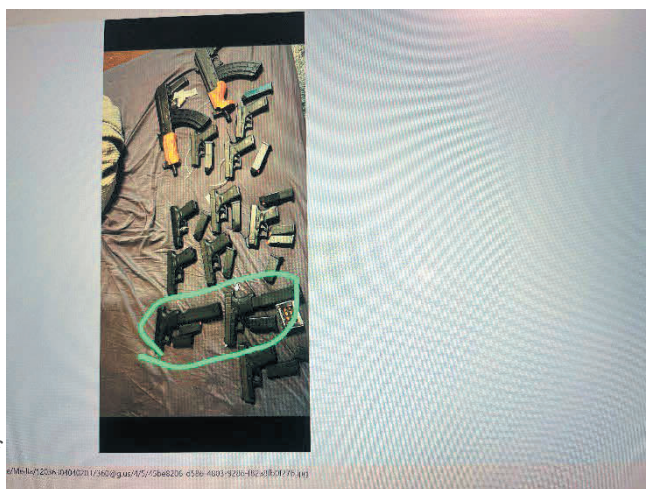
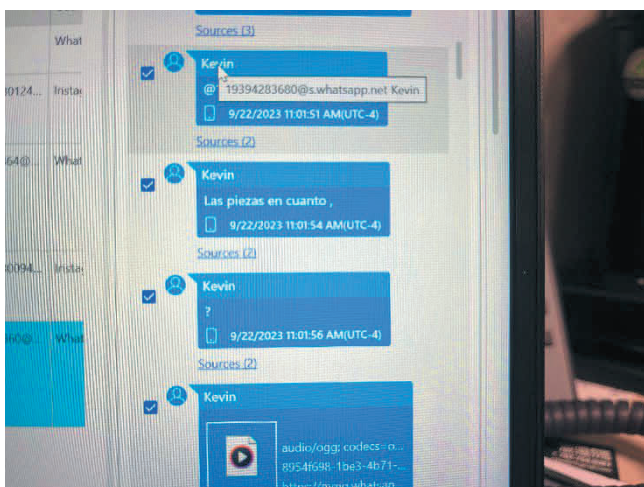
The following pictures will show COUVERTIER holding firearms. These pictures were obtained through a preliminary consent search of COUVERTIER'S cellphone.



The following pictures will show ISAAC holding firearms. These pictures were obtained through a preliminary consent search of ISAAC's cellphone.



The following picture will show BONILLA stating, “las piezas en cuanto”. Based on my training and experience, BONILLA is inquiring about the cost of a firearm. The picture below shows a voice audio stating, “That they are asking me, whoever wants some to send me the symbol of the pistol.” Here, he is referring to the purchase of firearms for people that he is in a group chat with. BONILLA's cellphone number in the picture was verified through a law enforcement database. These pictures were obtained through a full extraction resulting from a consent to search of COUVERTIER's cellphone.



11. All subjects were transported to the HSI Antilles Building office for further processing.
12. This investigation revealed that no firearms or ammunitions, including the type mentioned above, are manufactured in the Commonwealth of Puerto Rico. Therefore, the aforementioned firearms or ammunition were shipped or transported through interstate or foreign commerce.
13. Based on the foregoing facts and circumstances, your affiant submits that probable cause exists to believe that Luis Nomar ISAAC Sanchez Also Known As (AKA) “cdobleta”, Joshua Enrique BULA Cartagena, Kevin Manuel BONILLA Ramirez, and Eli Yaniel COUVERTIER Pollock violated 18 U.S.C. § 922(o)– Possession of a Machinegun and 18 U.S.C. §2 Aiding and Abetting.

I declare that the foregoing is true and correct to the best of my knowledge.

Michael Villanueva

MICHAEL S
VILLANUEVA
ACEVEDO

Digitally signed by MICHAEL
S VILLANUEVA ACEVEDO
Date: 2024.03.29 18:35:28
-04'00'

Michael Villanueva
Special Agent
Homeland Security Investigations

Subscribed and sworn before me pursuant to FRCP 4.1 at 7:05 p.m. by telephone, this 29th
day of March 2024.

BRC



Hon. Bruce J.
McGiverin

Hon. Bruce McGiverin
United States Magistrate Judge
District of Puerto Rico