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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 952(a) and 960(b)(2)(B))

EARLANDO MC RAE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

IGOR GAMZA, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about November 4, 2017, within the Eastern District of New York and elsewhere, the defendant EARLANDO MC RAE, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance, in an amount of 500 grams or more.

(Title 21, United States Code, Section 952(a) and 960(b)(2)(B))

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) and have been involved in the investigation of numerous cases involving narcotics smuggling. I am familiar with the facts and circumstances set forth below from my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

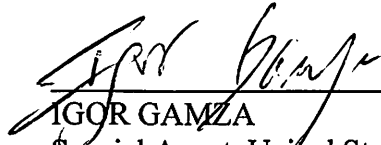
2. On November 4, 2017, the defendant EARLANDO MC RAE arrived at John F. Kennedy International Airport (“JFK Airport”) in Queens, New York, aboard Fly Jamaica Airways flight number 272 from Georgetown, Guyana by way of Kingston, Jamaica.

3. Upon his arrival at JFK Airport, the defendant EARLANDO MC RAE was selected for an enforcement examination by United States Customs and Border Protection (“CBP”) officers. The defendant presented a dark-colored “INUSA” suitcase and its contents. The defendant, who appeared nervous during the enforcement examination, stated that everything in the suitcase belonged to him that no one had given him anything to bring to the United States.

4. CBP officers conducted a search of the suitcase and determined that the walls of the suitcase felt unusually thick. Officer probed the walls of the suitcase and discovered a white, powdery substance, which field-tested positive for cocaine. A total gross weight of approximately 2,501.4 grams of cocaine was seized.

5. The defendant EARLANDO MC RAE, was advised of his Miranda rights. He stated he understood those rights and waived them orally. He in stated in sum and substance and in part that he knew the dark-colored “INUSA” suitcase contained cocaine prior to his trip.

WHEREFORE, your deponent respectfully requests that the defendant EARLANDO MC RAE, be dealt with according to law.



IGOR GAMZA
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
6th day of November, 2017



THE HONORABLE
UNITED STATES
EASTERN DISTRICT OF

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