

SEIZURE DECLARATION

I, Tony Bell, declare under penalty of perjury as follows:

INTRODUCTION

1. I, Tony Bell, am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), assigned to HSI Resident Agent in Charge (RAC) Raleigh, North Carolina field office. I have been employed as a Special Agent for over 17 years in Federal Law Enforcement. My duties include investigating violations of Titles 8, 18, 19, 21, and 22 of the United States Code (USC), to include violations of narcotics smuggling, narcotics trafficking, and money laundering activities associated with illegal narcotics. I have participated in numerous narcotics investigations, during the course of which I have interviewed suspects and witnesses, conducted physical surveillance, executed court-authorized search and arrest warrants, including search warrants for electronic devices and accounts, and used other investigative techniques to secure relevant information regarding various crimes. As a result of my training and experience, I am familiar with techniques and methods of operation used by individuals involved in criminal activity to conceal their activities from detection by law enforcement authorities.

2. As a Special Agent, I have prepared or written numerous search and seizure warrants for drug violations and have made or participated in numerous arrests of persons who have violated federal violations. I have received training and have field experience in the operations of street-level drug and large-scale drug trafficking operations. I have developed, obtained information from, and used confidential sources of information during these investigations. I have participated in numerous investigations that have utilized cell site location as an investigative tool.

3. In connection with my official duties, I investigate criminal violations of federal drug laws and related offenses, including, but not limited to, violations of 21 USC §§ 841 & 846.

4. In my employment, I have conducted numerous investigations on narcotics traffickers within the Eastern District of North Carolina (EDNC). Consequently, I am familiar with the ways in which drug traffickers operate their illegal enterprise, including, but not limited to, their use of cellular telephones and their use of numerical codes and code words to conduct their transactions. I know that drug trafficking is often furthered by utilizing multiple cellular phones, multiple insulated contacts, pre-paid cellular phones, and phones designated to be used only for incoming or outgoing calls, which is also known as compartmentalization. I know that drug traffickers frequently use cellular telephones subscribed to false names or to persons other than the user. The use of telephones in this manner is designed to help avoid detection by law enforcement.

5. I know, based upon my training and experience, that drug trafficking organizations routinely utilize a number of other operational techniques. These practices are designed and implemented to achieve two goals: first, the successful facilitation of the organization's illegal activities, which consists of the transportation and distribution of controlled substances and the subsequent collection of the proceeds of that illegal activity; and second, minimizing the exposure of organization members, particularly those operating in management roles, from investigation and prosecution by law enforcement.

6. The facts in this Seizure Declaration come from my personal observations, training and experience, review of documents, and information obtained from other agents and witnesses. This Seizure Declaration is intended to show merely that there is probable cause for the seizure of \$115,413 in bulk currency.

7. Based on the facts set forth in this Seizure Declaration, there is probable cause to believe that a violation of 21 USC § 846 (“TARGET OFFENSE”) has been committed, is being committed, and will be committed by Ramon Lee LYON. There is also probable cause to seize the \$115,413 described based on violations of the TARGET OFFENSE.

INVESTIGATIVE OVERVIEW

8. HSI RAC Raleigh and the Department of Justice (DOJ), Drug Enforcement Agency (DEA), Resident Agent (RA) Greensboro, have initiated an investigation into a narcotics distribution organization that is shipping large amounts of illegal narcotics from California to the Carolinas and other locations throughout the US for distribution. HSI Raleigh & DEA Greensboro Agents are investigating this drug trafficking organization and its members for violations of 18 USC § 1956, Money Laundering; and 21 USC § 846, Conspiracy to Traffic Marijuana within the EDNC and other related offenses.

9. On June 3, 2020, at approximately 0530hrs, HSI RAC Raleigh and HSI Task Force Officers (TFOs) were notified by Transportation Security Agency (TSA) Officers at Raleigh-Durham International Airport (RDU) that they had located a large amount of bulk US currency in the carry-on bag of Ramon Lee LYON. TSA alerted to a large organic mass inside of LYON’s carry-on luggage and after further examination discovered a large amount of bulk US currency that was concealed under the plastic liner inside the luggage. TSA officers then contacted RDU Police Officers to conduct a follow-up interview with LYON. LYON was scheduled to travel from RDU on Delta Airlines Flight #4747 through Detroit, MI, with a final destination of Los Angeles, CA (LAX). LYON had purchased a one-way ticket the day before, and later disclosed to Agents that he did not have a return flight or any accommodations reserved in California.

10. The RDU PD Officer on duty at Terminal 2 at that time responded to TSA while they were examining LYON's luggage. The RDU PD Officer stated that there was a strong odor of marijuana coming from the luggage, that there was a bundle of unwrapped money found among LYON's clothes, and a larger amount of US Currency that was vacuum sealed and artfully concealed underneath the plastic liner of the duffle bag. The currency inside the vacuum bag was wrapped in newspaper so as to further disguise its contents. LYON initially told the RPD Officer that he was in possession of \$6,000.

11. Based on my training and experience conducting narcotics investigations, I know that California is a source state of marijuana and other illegal narcotics which are transported to North Carolina for distribution. I also know that bulk currency that is proceeds of illegal narcotics activity often maintain the smell of narcotics on the bulk currency. I know based on my training and experience that narcotics traffickers often shrink-wrap their bulk currency from narcotics proceeds to evade law enforcement and possible K9 searches by minimizing the amount of odor being emitted from the bulk currency.

12. Additional RPD Officers responded to the scene and initiated an interview with LYON about the bulk currency. At that time LYON stated to the officer that he was in possession of \$60,000 and that he was going to California to purchase some land.

13. HSI TFO Woodlief responded to the scene and continued the interview with LYON. LYON stated that he resided at 1825 Garner Rd., Raleigh, NC. LYON stated that his cellphone number was (919) 426-8910. LYON stated that the bulk currency was proceeds from an Internet Sweepstakes business called the "Phish Lounge" that he ran at this location. LYON stated that the Phish Lounge was registered as an LLC in North Carolina with Denise Williamson as the

registered agent. HSI TFOs conducted a database query of the North Carolina Secretary of State and could not verify the information provided by LYON.

14. LYON then stated to HSI TFO Woodlief that he was in possession of \$100,000 in bulk currency and that he was traveling to California to purchase a video poker machine. LYON was unable to provide any specific details on where he was purchasing the video poker machine. During questioning, LYON repeatedly looked at his phone and showed agents what appeared to be a screenshot of a picture of an event flyer depicting a video poker machine, but LYON could not identify the make or model of the machine in question. LYON subsequently consented to a search of his phone, but the phone's internal data and text messages appeared to have been erased with the only information dated September 2019 and earlier. There was no evidence of a video poker business or machines on his phone.

15. During LYON's interactions with RDU PD and the HSI TFO he provided numerous false and inconsistent statements as to the nature of his travel plans and the origins, purpose and amount of the bulk US Currency that he was transporting to California. LYON initially agreed to abandon the bulk currency to HSI TFO Woodlief and signed a DHS Form 4607.

16. On June 3, 2020, I conducted a law enforcement database query on LYON and identified a previous bulk currency seizure by HSI RAC Orange, CA in May 2019. HSI Orange Agents were conducting interdiction operations at FedEx and a canine alerted to the presence of narcotics on a FedEx package # 7872 1386 9700 going to Tina NGUYEN in Buena Park, CA. The shipper was listed as "Ramon Dixon" from Raleigh, NC and provided (919) 426-8910 as his contact number. HSI RAC Orange Agents could not identify a Ramon Dixon in May 2019 but they did determine that the number was associated with Ramon LYON. This is the same number that LYON provided to HSI TFO Woodlief during his encounter at RDU on June 3, 2020. HSI Orange Agents executed

a search warrant for the FedEx package that HSI Agents believe was shipped by LYON to NGUYEN and seized \$40,085 in bulk currency. HSI RAC Orange seized this bulk currency and it was administratively forfeited with no claims filed.

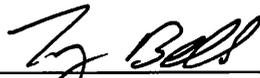
17. HSI Raleigh Agents conducted a law enforcement database query on LYON and determined that LYON had an extensive criminal history. In November 1993, LYON received two felony convictions, one for PWISD Cocaine, and one for Sell or Deliver Cocaine. In December 1995, LYON was convicted of two felonies associated with Assault with a Deadly Weapon on Education Property and Possession of a Firearm by Felon. In September 1996, LYON was convicted of a felony Trafficking in Cocaine. In February 2003, LYON was convicted of a felony Maintaining a Vehicle/Dwelling for Controlled Substances. In December 2007, LYON was convicted of two felonies, one for PWISD Marijuana and one for Maintaining a Vehicle/Dwelling for Controlled Substances. In January 2011, LYON was convicted of two felonies, one for PWISD Marijuana and one for Elude Arrest with Aggravating Factors.

18. On October 8, 2020, HSI Raleigh conducted a query of the North Carolina Employment Security Commission database on LYON and determined that he has no employment history and no reported wages in the system.

19. Based on the above facts I submit that there is probable cause to believe that the \$115,413.00 in US currency seized from LYON was furnished or intended to be furnished in exchange for a controlled substance, or is proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act, and is, therefore, subject to forfeiture to the United States pursuant to Title 21, U.S.C. section 881(a)(6). Your Declarant further believes that the foregoing evidence is sufficient to support a reasonable belief

that the government will meet its burden of proof to establish the forfeitability of the currency at trial.

I declare until penalty of perjury that aforementioned information, as known or provided to me, is true and correct. This, the 8th day of October, 2020.



Tony Bell
Special Agent
Homeland Security Investigations