

AFFIDAVIT OF LAURA E. GIOUZELIS

I, Laura E. Giouzelis, being duly sworn under oath, depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed since August 2010. I am currently assigned to the Sacramento Division of the FBI, in the Violent Crimes Squad. In my current assignment, I am responsible for investigating Organized Crime in the Eastern District of California and elsewhere. As an FBI agent, I have assisted in the execution of search warrants on many occasions for controlled substances and/or related paraphernalia, the sales of controlled substances, indicia, and other evidence of violations of federal drug and money laundering statutes.

2. Illegal drugs, including marijuana, are typically bought and sold in exchange for cash, and it is common for drug traffickers to conceal large sums of currency, precious metals, jewelry, wire transfer receipts, cashier checks, money orders and receipts, and other financial instruments or items of value which either represent the proceeds from drug sales or are intended for the purchase of controlled substances, including documentation relating to the purchase of real estate, businesses, and motor vehicles. In this investigation, some of the drug traffickers used gambling to legitimize their cash. When drug traffickers amass such wealth, they often attempt to legitimize that wealth or otherwise conceal it and its origin from discovery by law enforcement. Collectively, the methods used by drug traffickers to conceal the source of and utilize their illicit income are called money laundering. Money launderers also oftentimes utilize businesses as “fronts” in an attempt to legitimize and conceal their activities and use aliases and nominees to conceal assets and financial activity.

3. During the course of my employment as a FBI Special Agent, I have participated in a number of criminal investigations and have gained knowledge and experience by working with senior agents. I have participated in federal and state search warrants involving the seizure of the aforementioned listed controlled substances, the seizure of records relating to the manufacturing and distribution of controlled substances, and other types of evidence that document the activities of drug trafficking organizations and its members. To successfully conduct these investigations, I have utilized a variety of investigative techniques and resources, including physical and electronic surveillance and various types of infiltration, including undercover agents, informants, and cooperating sources. Based

1 on these investigations, my training and experience, and conversations with other experienced agents
2 and law enforcement personnel, I have become familiar with the methods used by traffickers to smuggle
3 and safeguard narcotics, distribute narcotics, and collect and launder proceeds from narcotic
4 transactions.

5 4. This affidavit is made in support of a warrant for arrest of Approximately \$27,231.00 in
6 U.S. Currency (“defendant currency”). The defendant currency was money furnished and intended to be
7 furnished in exchange for a controlled substance or listed chemical, constituted proceeds traceable to
8 such an exchange, and was used and intended to be used to commit or facilitate a violation of 21 U.S.C.
9 §§ 841, et seq. As a result of the foregoing, the defendant currency is subject to forfeiture to the United
10 States pursuant to 21 U.S.C. § 881(a)(6).

11 **FACTUAL ALLEGATIONS**

12 5. The facts in this affidavit are known to me as a result of my personal participation in this
13 investigation, through conversations with other agents and detectives who have participated in this
14 investigation, and from reviewing official reports, documents, and other evidence obtained as a result of
15 the investigation and I have determined the following:

16 6. Since 2017, the FBI has been actively investigating certain groups and individuals
17 responsible for large indoor marijuana grows throughout the Eastern District of California. In February
18 of 2020, FBI received information regarding an illegal indoor marijuana grow at 5608 Glen Oaks Drive
19 in Rocklin, California. The FBI then investigated the property and, through electrical records and other
20 evidence, confirmed the likely presence of illegal marijuana being grown at the home. The FBI also
21 connected the illegal grow in Rocklin to multiple individuals living in Sacramento, including Ming
22 Guang Chen (“Chen”).

23 7. On May 13, 2020, Rocklin Fire Department received an emergency call regarding an
24 active fire at 5608 Glen Oaks Drive, Rocklin, California. Rocklin Fire Department and Rocklin Police
25 Department responded to the call and entered the home to ensure the safety of any occupants of the
26 residence. While inside the home conducting the safety sweep, Rocklin Police Department found no
27 occupants but observed marijuana growing in multiple rooms throughout the residence. Rocklin Police
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1 Department and Fire Department further observed the house's electrical system had been illegally
2 bypassed, a common indicator of an illegal marijuana grow.

3 8. On May 14, 2020, FBI agents executed a federal search warrant at 5608 Glen Oaks
4 Drive. During the search of the residence, agents found approximately 828 marijuana plants, marijuana
5 ballasts, and evidence connecting the marijuana grow to certain individuals living in Sacramento,
6 including Chen. Based on the items seized during the search and physical surveillance, the FBI learned
7 that the individuals growing marijuana at 5608 Glen Oaks traveled to/from 7279 Long River Drive
8 (Chen's residence) and 7817 Renton Way, both in Sacramento.

9 9. On June 9, 2020, FBI agents executed a federal search warrant at 7279 Long River Drive,
10 the residence of Chen and his wife. During the search, agents found the \$27,231.00 in cash (the
11 "defendant currency") in a suitcase in Chen's bedroom and another room, four postal money orders
12 totaling thousands of dollars, documents connected to, and associated with, the residence located at 5608
13 Glen Oaks Drive in Rocklin, and processed marijuana.

14 10. The FBI has investigated Chen's employment history and learned that the California
15 Employment Development Department, the state agency responsible for reporting wages, had no
16 reportable income for Chen.

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