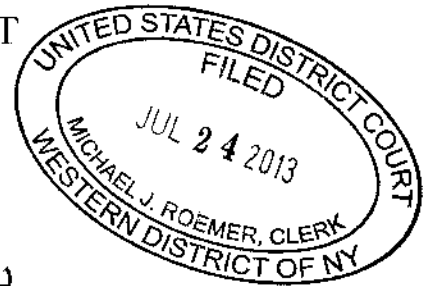


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of New York



United States of America)

v.)

ALLEN M. YOUNG)

Case No.)

13-M- 112)

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 December 13, 2012 in the county of Orleans in the Western District of New York, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Knowingly and intentionally possessing with intent to distribute a mixture and substance containing methylene, a Schedule I controlled substance.

This criminal complaint is based on these facts:

See attached Affidavit of DEA Special Agent Gregory R. Yensan

Continued on the attached sheet.

Gregory R. Yensan
Complainant's signature

Gregory R. Yensan, Special Agent, DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: 7/24/13

Jeremiah J. McCarthy
Judge's signature

City and state: Buffalo, New York

Jeremiah J. McCarthy, U.S. Magistrate Judge
Printed name and title

A F F I D A V I T

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

GREGORY R. YENSAN, being duly sworn, deposes and says:

1. I am a Special Agent with the Drug Enforcement Administration (DEA), Buffalo Resident Office, which is an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), and so an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I am currently assigned to Enforcement Group D57, which is composed of Special Agents and local law enforcement officers investigating narcotics trafficking. I have been employed as a DEA Special Agent since August 2004, and have participated in numerous investigations concerning the distribution of unlawful controlled substances.

2. From 1996 to 2004, I was a law enforcement officer with the Newport News Police Department and the Chesapeake Police Department, both in Virginia. During that time, I worked

various aspects of narcotics interdiction, and in 2002 I was promoted to Narcotics Detective of the Special Investigative Section. During this time, I participated in numerous narcotics investigations involving the illegal manufacture, possession, sale, and distribution of controlled substances.

3. This affidavit is submitted in support of a criminal complaint charging ALLEN M. YOUNG, with violations of Title 21, United States Code, Section 841(a)(1), the unlawful possession with intent to distribute of a Schedule I controlled substance. The information in this Affidavit has been obtained from my investigation into the events set forth below as well as information provided to me by other law enforcement officers.

4. On December 12, 2012, members of the Orleans County Major Felony Crime Task Force ("MFCTF") obtained a search warrant for ALLEN YOUNG's person, residence (11396 Martin Road, Shelby, New York), and the car he drove, a 2005 Acura, which authorized a search for, among other items, various narcotics and related paraphernalia. On December 13, 2012, at about 5:00 p.m., members of the MFCTF observed YOUNG driving the Acura and picking up a woman, JSJ.

5. At about 5:40 p.m., YOUNG stopped at the Champs Mini Mart, 11279 Ridge Road, Ridgeway, Orleans County, New York. At that time, officers attempted to execute the search warrant, whereupon YOUNG entered his vehicle, backed out and drove away in a reckless manner - nearly striking two officers - then fled at a high rate of speed but was not chased.

6. JSJ states that as she screamed for her life YOUNG turned on Marshall Road and turned off his headlights as he was driving. Moments later, when he turned the lights back on, the car was headed straight for a mailbox, at which point YOUNG jerked the steering wheel and caused the car to turn on its side and slide. When the car stopped, YOUNG ran from the car. JSJ stayed with the car and was treated for a sprained neck and back. MFCTF members recovered a box of nine .50 caliber ammunition cartridges from the Acura.

7. A resident at the location on Marshall Road, in whose yard the crash occurred, corroborates JSJ's account of the car accident. The resident observed a male running from the Acura trying to put a dark colored backpack on his shoulder and running toward a wooded area behind the resident's house.

8. Two days later, on December 15, the resident was walking in the woods behind his home and came across a black backpack. He determined it had been recently placed there because it was not there the week before, and he called the police and informed them. Police retrieved the bag, and, after testing by the Niagara County Sheriff's Office Forensic Laboratory, determined that among other items it contained 1.81 pounds (.82 kilograms) of methyldone, a Schedule I controlled substance. In your affiant's training and experience, this quantity of methyldone is intended for distribution and inconsistent with personal use.

9. On December 17, JSJ identified the backpack as YOUNG's.

10. After fleeing the jurisdiction to South Carolina, YOUNG was arrested in Erie, Pennsylvania on February 14, 2013, and returned to Orleans County for prosecution.

WHEREFORE, based on the foregoing, I respectfully submit that probable cause exists to believe that ALLEN M. YOUNG has violated Title 21, United States Code, Sections 841(a)(1) (possession with intent to distribute a mixture and substance containing methyldone, a Schedule I controlled substance).

Gregory R. Yensan

GREGORY R. YENSAN
Special Agent
Drug Enforcement Administration

Sworn to before me this 24th day of July, 2013.

Jeremiah J. McCarthy

HONORABLE JEREMIAH J. MCCARTHY
United States Magistrate Judge