
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

WILLIAM T. BOUZA

CRIMINAL COMPLAINT

Mag. No. 19-7482


I, Jeremiah Gussoni, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, and that this Complaint is based on the following facts:


SEE ATTACHMENT B

Continued on the attached page and made a part hereof.


Jeremiah Gussoni, Special Agent
U.S. Department of Homeland Security

Sworn to before me and subscribed in my presence,
October 30, 2019, in Essex County New Jersey

Honorable Cathy L. Waldor
United States Magistrate Judge


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Conspiracy to Distribute Heroin)

From in or around February 2019 through on or about October 29, 2019,
in the District of New Jersey and elsewhere, defendant,

WILLIAM T. BOUZA,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT TWO
(Impeding a Federal Officer)

On or about October 29, 2019, in Essex County, in the District of New Jersey, and elsewhere, defendant

WILLIAM T. BOUZA,

did forcibly assault, resist, oppose, impede, intimidate, and interfere with one or more persons designated in Title 18, United States Code, Section 1114, namely, Special Agents employed by the United States Department of Homeland Security, while the Special Agents were engaged in and on account of the performance of the Special Agents' official duties.

In violation of Title 18, United States Code, Section 111(a)(1).

ATTACHMENT B

I, Jeremiah Gussoni, am a Special Agent with the United States Department of Homeland Security ("HSI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. In or around February 2019, law enforcement learned of a large shipment of heroin that was scheduled to be delivered to an address in Union, New Jersey. The heroin had previously been hidden inside of a secret compartment, or "trap," inside of a Mercedes (the "Mercedes") that was being transported on an interstate car carrier. Law enforcement arranged a controlled delivery, whereby the Mercedes, which contained the secreted narcotics, would be delivered to the recipient. Shortly before the controlled delivery, law enforcement took up surveillance positions in the vicinity of the delivery.

2. Shortly before the delivery, law enforcement observed the defendant, William T. Bouza ("Bouza"), enter the area. As the carrier with the Mercedes entered the area, Bouza, using a telephone that was subsequently linked to him, called the driver to inquire as to why the shipment was now on a flatbed truck, as opposed to the larger carrier. Despite the driver's assurances that this was the standard practice, Bouza left the area, apparently suspecting the presence of law enforcement. The packages located in the trap located in the Mercedes were subsequently lab-tested and determined to contain heroin, and weighed approximately sixteen kilograms.

3. On or about March 29, 2019, law enforcement responded to a residence in Elizabeth, New Jersey, where a resident had reported receiving a parcel in the mail that contained a package of approximately one kilogram of heroin. Law enforcement responded, and took possession of the narcotics. Shortly thereafter, Bouza arrived at the location and questioned a resident about the package. Digital evidence and telephone records confirm that Bouza was in Elizabeth, New Jersey, at this time.

4. Law enforcement subsequently received judicial authorization to monitor various cellular telephones belonging to Bouza. Law enforcement also received judicial authorization to install and monitor GPS tracking devices on multiple vehicles that Bouza utilized in furtherance of the narcotics conspiracy. These

court orders revealed information that led law enforcement to multiple locations, or “stash-houses,” utilized by Bouza for processing and storing narcotics.

5. In or around October 2019, law enforcement utilized physical and electronic surveillance to monitor Bouza’s movements. During this time period, law enforcement observed multiple activities consistent with narcotics trafficking, such as the exchanging of large bags between individuals at locations that were obviously pre-arranged, planned meeting spots.

6. On or about October 29, 2019, law enforcement observed Bouza exit a location in Irvington, New Jersey carrying a large, weighted bag. Bouza entered the vehicle, and departed the area. Law enforcement subsequently attempted to conduct a motor vehicle stop, at which time Bouza fled from law enforcement.

7. Indeed, Bouza ignored obvious police lights and sirens and fled. During this time, Bouza operated his vehicle at a high rate of speed – law enforcement observed Bouza’s speeds to be in excess of approximately 70 miles per hour in a 35 mile-per-hour zone. Through his excessive speeding, Bouza increased the distance between himself and law enforcement. During this time, law enforcement believes that Bouza jettisoned the narcotics before ultimately abandoning his vehicle and continuing the pursuit on foot. Law enforcement proceeded to establish a perimeter around the area where Bouza was last seen. Thus far, law enforcement has been unable to locate Bouza.

8. A subsequent lawful search of Bouza’s vehicle revealed one small glassine fold of suspected heroin. Law enforcement believes that this single dose inadvertently fell out of the larger amount of narcotics that Bouza had on his person.

9. On or about October 30, 2019, law enforcement executed search warrants at multiple premises controlled by Bouza within the District of New Jersey. During the ensuing searches, law enforcement located large sums of United States Currency, multiple packages of heroin, and narcotics paraphernalia.