

SEALED

ORIGINAL FILED

UNITED STATES DISTRICT COURT AUG 14 2019

for the Eastern District of California

CLERK, U.S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA BY DEPUTY CLERK

United States of America v.

Manish PATEL

Defendant(s)

Case No 2:19 - MJ 0128 - EFB

ORIGINAL FILED

AUG 15 2019

CLERK, U.S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA BY

CRIMINAL COMPLAINT

I, Joshua Matas 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 February 7, 2017 to June 13, 2019 (21 U.S.C §§ 846, 841(a)(1)) and June 13, 2019 (21 U.S.C. § 841(a)(1)) in the county of El Dorado, Placer, and Sacramento in the

Eastern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Includes 21 U.S.C §§ 846, 841(a)(1) and 21 U.S.C. § 841(a)(1) with descriptions of marijuana offenses.

This criminal complaint is based on these facts:

(see attachment)

Continued on the attached sheet.

Handwritten signature of Joshua Matas

Complainant's signature

DEA, Special Agent Joshua Matas

Printed name and title

Sworn to before me and signed in my presence.

Date: 8-14-2019

Handwritten signature of Edmund F. Brennan

Judge's signature

City and state: Sacramento, California

Edmund F. Brennan, U.S. Magistrate Judge

Printed name and title



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**II. PURPOSE**

7. This Affidavit is made in support of the issuance of a Criminal Complaint charging Manish PATEL with violations of Title 21 U.S.C §§ 846, 841(a)(1) (Conspiracy to Possess with Intent to Distribute Marijuana Plants and Tetrahydrocannabinols contained in Hashish Oil) (from February 7, 2017 to June 13, 2019) and Title 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute Marijuana Plants and Tetrahydrocannabinols contained in Hashish Oil) (on June 13, 2019). This Affidavit is also being made in support of the issuance of an arrest warrant on the above charges.

8. Based on the facts set forth below, I believe Manish PATEL is distributing hundreds of pounds of marijuana throughout the United States for profit and is conspiring with others, thus generating millions of dollars of drug proceeds.

**III. BASIS FOR FACTS AND CIRCUMSTANCES**

9. The conclusions and opinions set forth below are based on my experience and training as a special agent, my direct participation in this investigation as described below, and conversations with other law enforcement officers who are familiar with the facts and circumstances of this investigation. Throughout this affidavit, all sentences that begin with the words "I believe" are based upon this combination.

10. As detailed below, the probable cause supporting the issuance of a complaint and arrest warrant is based on an investigation that included the review of search warrants and reports generated by various law enforcement agencies assisting in this investigation, which I have reviewed.

**IV. SUMMARY OF PROBABLE CAUSE**

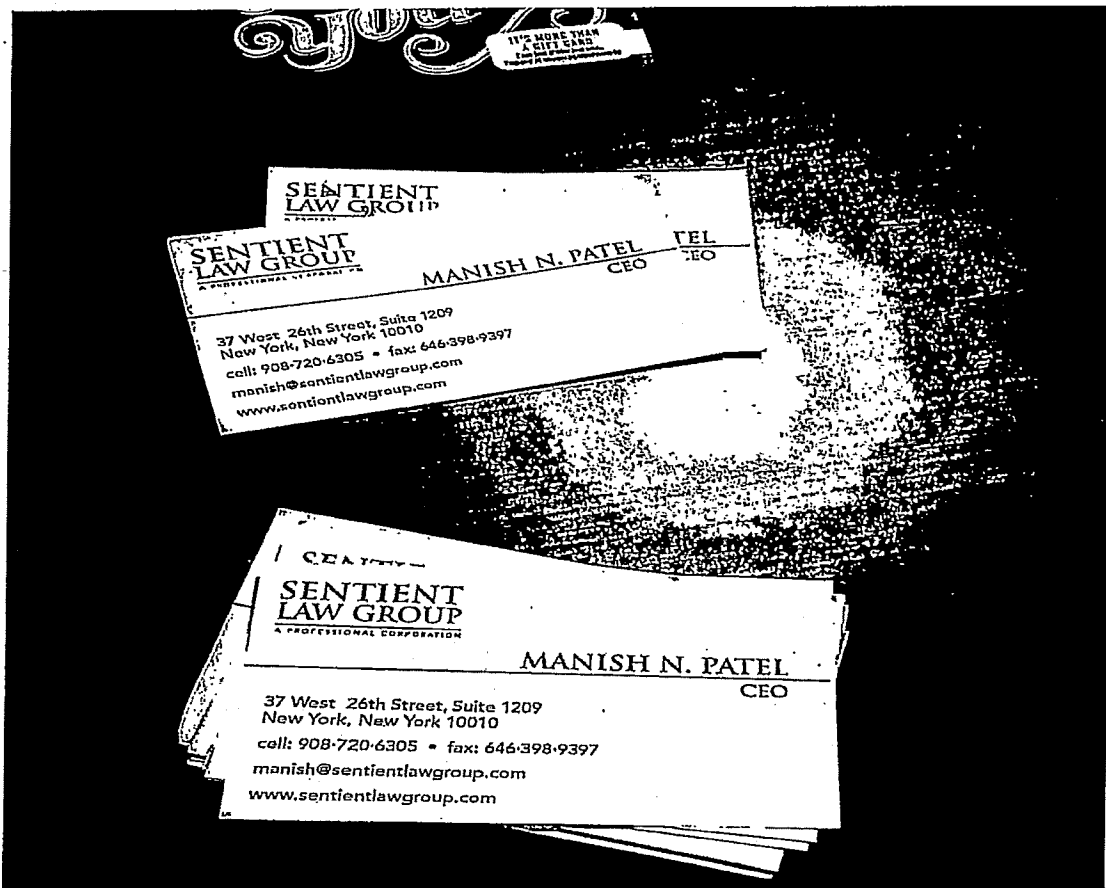
11. Since at least May 2019, investigators have collected evidence that Manish Patel, a licensed attorney in two East Coast states, has conspired to manufacture marijuana and concentrated cannabis oil in the Eastern District of California. Further, Patel has conspired to transport marijuana and concentrated cannabis oil across the country using his Learjet since at least August 2018 when the DEA interdicted Patel and several associates at an executive airport in Albuquerque, New Mexico and seized \$80,000 in cash and evidence indicating large-scale interstate drug trafficking. In May and June 2019, law enforcement in California executed search warrants at three locations in the Eastern District of

1 California that resulted in the seizure of approximately 1,400 pounds of marijuana contraband and  
2 \$400,000 in cash.

3 **V. STATEMENT OF FACTS**

4 **A. Manish PATEL**

5 12. Manish PATEL is a licensed attorney in New York (admitted in 2015) and New Jersey  
6 (admitted in 2017) and is affiliated with Sentient Law Group in New York. In late 2018, Placer County  
7 Sherriff's Department (PCSD) Detective Lyssand accessed Sentient Law Group's website and observed  
8 that PATEL is listed as the CEO. Detective Lyssand attempted to connect to ten hyperlinks listed under  
9 "Practice Areas," however none of the links worked. As of August 5, 2019, the Sentient Law Group  
10 website no longer identifies Patel as a practicing attorney related to Sentient Law group. Patel's CEO  
11 business card, seized by police during the search warrants described herein, is shown below.



1           13.     In 2005 and again in 2011, Patel was arrested in New Jersey for marijuana related  
2 offenses. It is likely that any convictions from the New Jersey arrests have been expunged or resolved  
3 from his criminal history through a state diversion program. In 2015, however, Patel was arrested in  
4 Shasta County for violations of California Health & Safety Code §§ 11359 (Possession for Sale of  
5 Cannabis), 11360 (Transportation and Sale of Cannabis) and PC 182 (Conspiracy). The California  
6 arrest stemmed from a traffic stop of a car in which Patel was the sole passenger, and the driver was  
7 from New Jersey. A search of the car revealed 241 individually packaged 1 pound turkey bags of  
8 processed marijuana, a box of additional packaging material, and over \$6,000 cash. I continue to look  
9 into the disposition of the Shasta County traffic stop, but it appears that PATEL was not criminally  
10 charged.

11           **B.     2018 DEA Search of PATEL's Learjet at a New Mexico Airport**

12           14.     As set forth below, PATEL purchased a Learjet 25D, Tail No. N25CY (hereinafter, "the  
13 Learjet"), for \$345,000 in February 2017, and uses his private jet to fly around the country. PATEL  
14 employs a team of certified pilots, typically paying them in cash, and his travel typically involves flying  
15 from the East Coast to California, and returning to New Jersey or New York. On many occasions,  
16 PATEL pays the pilots to fly his Learjet around the country containing only cargo and no passengers.

17           15.     On August 28, 2018 the DEA stopped PATEL as he boarded his Learjet in Albuquerque,  
18 New Mexico. The DEA was conducting a "Ramp Check" of PATEL's Learjet 25D, Tail No. N25CY,  
19 identifying the pilots as [REDACTED] and [REDACTED]. A search of the Learjet revealed  
20 approximately \$80,000.00 in cash, a cashier's check for \$450,000.00, and 2 Apple laptops belonging to  
21 the passengers of the plane, PATEL and [REDACTED]. The \$80,000 in cash was found inside a  
22 cardboard box: many bundles of vacuum-sealed stacks of cash ranging from approximately \$8,000.00 to  
23 \$10,000.00 in cash.

24           16.     PATEL's and [REDACTED]'s phones were seized by the DEA and revealed text  
25 communications referencing the trafficking of narcotics from sources of supply in California to states  
26 like New York and Florida, as well as laundering of drug proceeds through a complex network of  
27 business accounts. The DEA further seized paperwork including various legal contracts, hand written  
28 ledgers including pay/owe sheets, and pictures of [REDACTED] using paraphernalia commonly

1 associated with marijuana consumption.

2 17. Since the searches described in detail below, law enforcement has reviewed documents  
3 and interviewed several individuals associated with PATEL's acquisition and use of the Learjet. Law  
4 enforcement interviewed [REDACTED] sold the Learjet to PATEL for \$345,000  
5 in February 2017. The transaction commenced on December 29, 2016 when PATEL deposited \$44,650  
6 into a bank account designated for the Learjet's purchase. [REDACTED] told law enforcement the  
7 Learjet's purchase price was \$345,000 and that the transaction was remarkable because PATEL paid  
8 approximately \$300,000 of the purchase price in cash. In late January or early February 2017, PATEL  
9 personally brought \$300,350 in cash to [REDACTED] Florida, [REDACTED] and PATEL  
10 and [REDACTED] went to a Bank of America branch in [REDACTED] to have a teller count the cash.  
11 The \$300,350 represented the balance of the purchase price after crediting the \$44,650 deposited into  
12 the bank account in December 2016.

13 18. The Learjet was purchased by PATEL, but title to the Learjet is held in an LLC out of  
14 Nevada. The Bill of Sale for the Learjet references a closing date of February 7, 2017.

15 **C. Search of Commercial Property in El Dorado County**

16 19. On or about May 9, 2019, El Dorado County Sheriff's Office (EDSO) detectives received  
17 information from an anonymous source that illegal marijuana activity was possibly occurring at a  
18 commercial property located at 4175 Business Drive, Suite D in Cameron Park (hereinafter, "Suite D").  
19 The anonymous source described to law enforcement a heavy odor of marijuana emanating from the  
20 business and suspicious behavior by individuals associated with the location.

21 20. On the morning of May 13, 2019, EDSO Detective Alonzo Aguilar contacted 4175  
22 Business Drive's owner, [REDACTED] and property manager, [REDACTED]  
23 stated that he was aware of a complaint of marijuana odor at Suite D, and that he had responded to Suite  
24 D that morning (*May 13, 2019*) and observed active, functioning lab equipment in Suite D. A white  
25 male adult approached [REDACTED] and stated that the equipment was a "CBD extraction for hemp."  
26 [REDACTED] then called PATEL as he was listed on one of the documents associated with the lease  
27 for Suite D. PATEL told [REDACTED] that he would look into the matter and call him back later.

28 21. In the afternoon of May 13, 2019, EDSO detectives <sup>went</sup> to Suite D in order to hold the

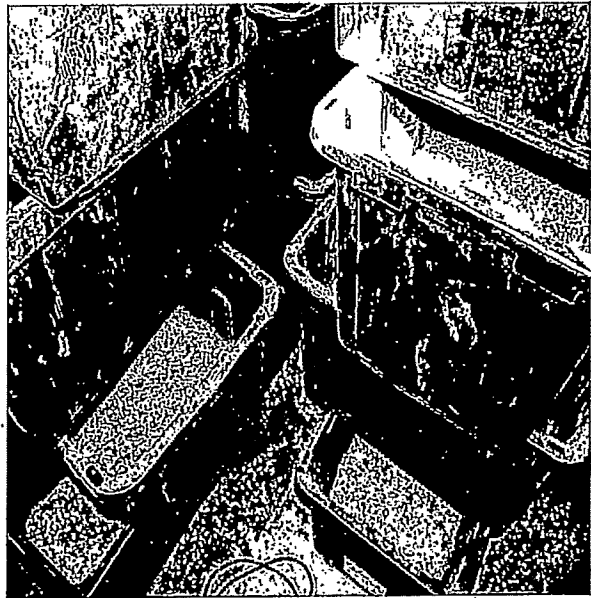
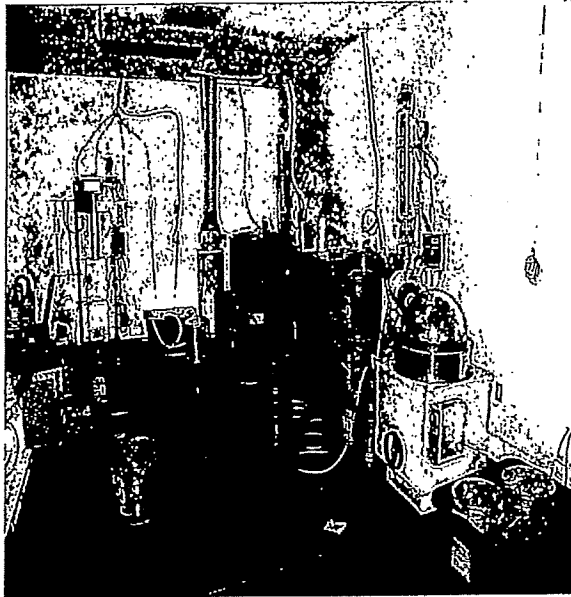
1 location while a search warrant was obtained. When they arrived on scene, detectives located two  
2 individuals, Kevin Healy ("Healy") and Tyler McClean, inside of Suite D. Both men were identified by  
3 their New York driver licenses. Healy and Tyler McClean appeared to be working in an active  
4 marijuana distillation lab. Tyler McClean identified a white Mercedes in the parking lot as his, and  
5 DMV check of the white Mercedes revealed it was registered to William McClean or ██████████ out  
6 of Folsom, California. Kevin Healy identified a Ford Fusion as his, which was registered to ██████████  
7 ██████████ out of Visalia, California.

8 22. In the evening of May 13, 2019, law enforcement executed a warrant at Suite D and  
9 observed an active lab designed to manufacture concentrated cannabis. There were two active  
10 distillation machines, multiple 50 gallon drums of alcohol, a bucket containing suspected Hexane,  
11 vacuum ovens, large amounts of glassware, air filters with ventilation hoses, dozens of metal pots,  
12 hundreds of individual cartridges for hash oil vape pens, vacuum sealers, ethanol extractors, ice chests, a  
13 money counter, and notes related to the manufacturing of concentrated cannabis. There was also a large  
14 piece of stainless steel machinery in the lab, manufactured by Pope Scientific, Inc. EDSO Detective  
15 Mike Roberts later researched the Pope Scientific, Inc. website and found the item, and determined that  
16 it was used in the distillation process of cannabis refinement.

17 23. Inside of Suite D, law enforcement seized over 980 pounds (net weight) of processed  
18 marijuana and 88.27 pounds (combined net and gross weights) of concentrated cannabis from the  
19 property. Detectives were unable to obtain an accurate net weight of all of the concentrated cannabis.  
20 Due to its sticky nature, a significant amount of the concentrated cannabis could not be removed from  
21 the storage containers. The net weight they confirmed was 53.55 pounds, however this weight did not  
22 include the concentrated cannabis found in storage containers. Therefore, the true net weight of the  
23 concentrated cannabis seized from the containers exceeded 53.55 pounds. In total, detectives seized  
24 more than approximately 1,000 pounds of marijuana and concentrated cannabis from the marijuana lab  
25 in Suite D. Suite D's lab and marijuana trunks as found by law enforcement on May 13, 2019:

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13 24. During the search detectives also found linkages to marijuana trafficking in Placer  
14 County, California and indicia for PATEL, William McClean, and Tyler McClean. For example:

- 15 a) In the area of Suite D devoted to the cannabis lab, detectives found a box with a label  
16 showing the parcel had been shipped to Manish PATEL at 4858 Cavitt Ranch Place in  
17 Granite Bay, California. This receipt indicated that the customer had the business name  
18 of "High Tech, LLC," a business associated with 8178 Belvedere Avenue in Sacramento,  
19 which is a known historical marijuana grow location as discussed below.
- 20 b) During a search of Kevin Healy's Ford Fusion and Tyler McClean's Mercedes, law  
21 enforcement found materials commonly used to package marijuana such as turkey bags,  
22 vacuum bags, packing tape, and bubble wrap. In Tyler McClean's Mercedes, detectives  
23 found an automobile insurance card identifying William and Tyler McClean. On the  
24 card, the pair listed the 4858 Cavitt Ranch Place in Granite Bay, California as their  
25 address. The 4858 Cavitt Ranch Place location is hereinafter referred to as the "Granite  
26 Bay Residence."

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27 25. Based on my training and experience, I believe that Suite D was being used as a  
28 laboratory to create concentrated cannabis oil, colloquially referred to as "hash oil," "honey oil," and



1 when dried, “dab,” “shatter,” or “wax.” Honey oil is typically a waxy, oily substance, usually yellow in  
2 color. It can be vaporized (“dabbed”), allowing the user to inhale the concentrated active  
3 tetrahydrocannabinol (“THC”), a crystalline compound that is the main active ingredient of marijuana.  
4 It is also easy to add to foodstuffs, creating “edibles”. Honey oil can be made using a number of  
5 different processes. However, a common – and dangerous – method involves packing a cylinder with  
6 marijuana plant material, and injecting (often referred to in the business as “shooting” or “blasting”)  
7 solvent through the cylinder. The manufacturer typically uses the parts of the marijuana plant that are  
8 not appealing to traditional smokers, which allows the grower to make money off parts of the plant that  
9 were formerly sometimes just thrown away. The plant material is placed in the tube, and the solvent is  
10 released into the top of the tube, which is held vertically. The solvent flows downward and dissolves the  
11 cannabinoids/THC, which flow out of the bottom of the tube.

12 26. Based on my training and experience, I know that marijuana, both in plant form and in  
13 the form of concentrated cannabis oil, is a substance controlled under Schedule I, Title 21, United States  
14 Code, Section 812.

15 27. Kevin Healy and Tyler McClean were arrested on May 13, 2019 and booked into the El  
16 Dorado County Jail for violations of California drug laws. Arrest warrants were also issued for PATEL  
17 and William McLean for violations of California drug laws based on the May 13, 2019 search of Suite  
18 D. As described below, PATEL was arrested in Sacramento after loading marijuana onto his Learjet and  
19 is currently being held without bail in El Dorado County Jail.

20 **D. Further Investigation into Suite D’s Occupants and their Marijuana Lab**

21 28. After the search on May 13, 2019, law enforcement continued its investigation into the  
22 owners, operators, and facilitators of Suite D’s illegal cannabis lab. As part of those efforts, law  
23 enforcement obtained the lease agreement and other financial and business paperwork (*credit report,*  
24 *banking documents*) that the tenants submitted to the property manager support the lease application for  
25 4175 Business Drive, Suite D. Suite D’s lease documents set forth the following about PATEL, William  
26 McLean, and the proposed business at Suite D:

- 27 a) The lease agreement stated that Suite D had been rented beginning on May 1, 2019 for  
28 \$3,500 per month. The lease was for a three-year term, with annual 3% increases and a

1 security deposit of \$10,000, and was signed by William McClean on April 26, 2019.

2 b) In the lease application package, McClean represented he made over \$400,000 in income  
3 in 2018.

4 c) The property management company also provided email correspondence to EDSO  
5 detectives, dated April 28, 2019, which contains William McClean's banking  
6 information. This email was sent from a user identified as William McClean  
7 (wbmproperties1010@icloud.com) to Manish PATEL (manish@sentientlawgroup.com),  
8 and then forwarded from PATEL to [REDACTED] the secretary for the  
9 property manager.

10 d) A document titled "CONSENT TO OBTAIN CREDIT REPORT" was submitted to  
11 support the lease application as a guarantee and contained PATEL's personal  
12 information. Specifically, this consent form contained PATEL's date of birth, social  
13 security number, and signature. On this form, which was dated April 24, 2019, PATEL  
14 provided a street address of 64 Barbaree Way in Tiburon, California.

15 29. In late May 2019, EDSO detectives contacted the Placer County Sheriff's Department  
16 (PCSD) to connect about the linkages of the marijuana lab participants and 4858 Cavitt Ranch Place in  
17 Granite Bay—the Granite Bay Residence. As described above, PATEL listed the Granite Bay  
18 Residence as his delivery address on the parcel found at Suite D, and William and Tyler McClean listed  
19 the same Granite Bay address on the insurance documents found in the vehicle parked at Suite D. PCSD  
20 detectives relayed to EDSO that it had received a report of an altercation between William McClean and  
21 PATEL at the Granite Bay Residence in December 2018. Furthermore, PCSD detectives had recently  
22 opened a drug investigation into the occupants of the Granite Bay Residence after receiving information  
23 about multiple vehicles (more than ten at a time) being parked at the Granite Bay Residence and  
24 constant vehicle traffic at all hours.

25 30. PCSD detectives learned that PATEL and others occupied the Granite Bay Residence as  
26 of October 29, 2018 and paid rent of over \$10,000 per month. On April 20 and April 30, 2019, PCSD  
27 detectives observed purple lights shining through the opaque garage doors at the residence. At different  
28 hours of the night, it appeared that the purple lights were suspended in the center of the usable garage

1 space. The lights appeared to rotate up and down and would stay on for several hours and then turn off;  
2 indicating a timed lighting system was likely being utilized, similar to the systems commonly used in  
3 indoor marijuana grows. Based on those observations and his knowledge and experience in law  
4 enforcement, Detective Gualco formed the opinion that a marijuana grow was possibly inside of the  
5 garage. PCSD detectives conducted surveillance of the Granite Bay Residence and, based on their  
6 observations of the activity at the home, they concluded that marijuana was possibly being grown in the  
7 residence's garage.

8 31. Between April 25, 2019 and May 11, 2019, PCSD detectives observed multiple high end  
9 vehicles, including a white Dodge Ram truck (CA license plate 65880M2) and a grey Mercedes Sprinter  
10 van (CA license plate 04626G2) at the Granite Bay Residence. The Mercedes Sprinter van was  
11 registered to High Tech, LLC, with an address of 8178 Belvedere Avenue in Sacramento. The Dodge  
12 Ram was registered to William McClean, with an address of 1006 Mud Pie Lane in Sacramento. On  
13 May 7, 2019, PCSD Detectives Lyssand and Gualco and observed William McLean at the Granite Bay  
14 Residence.

15 **E. Search of PATEL's Granite Bay Mansion**

16 32. On May 30, 2019, law enforcement executed a search warrant at the Granite Bay  
17 Residence. A male identified as [REDACTED] opened the front door of the house  
18 and he was the only person present at the house. [REDACTED] said he was a "live-in chef." Indicia located  
19 inside the Granite Bay Residence identified PATEL, William McClean, [REDACTED] as  
20 occupants.

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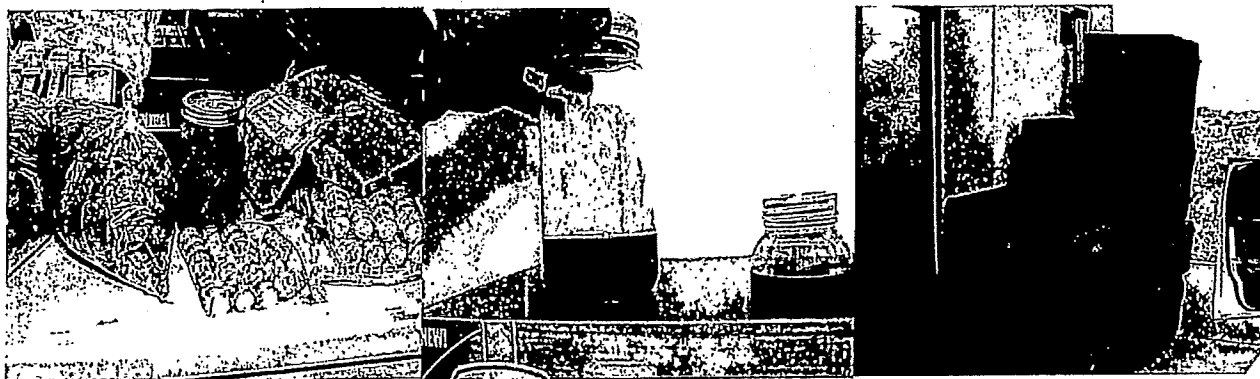
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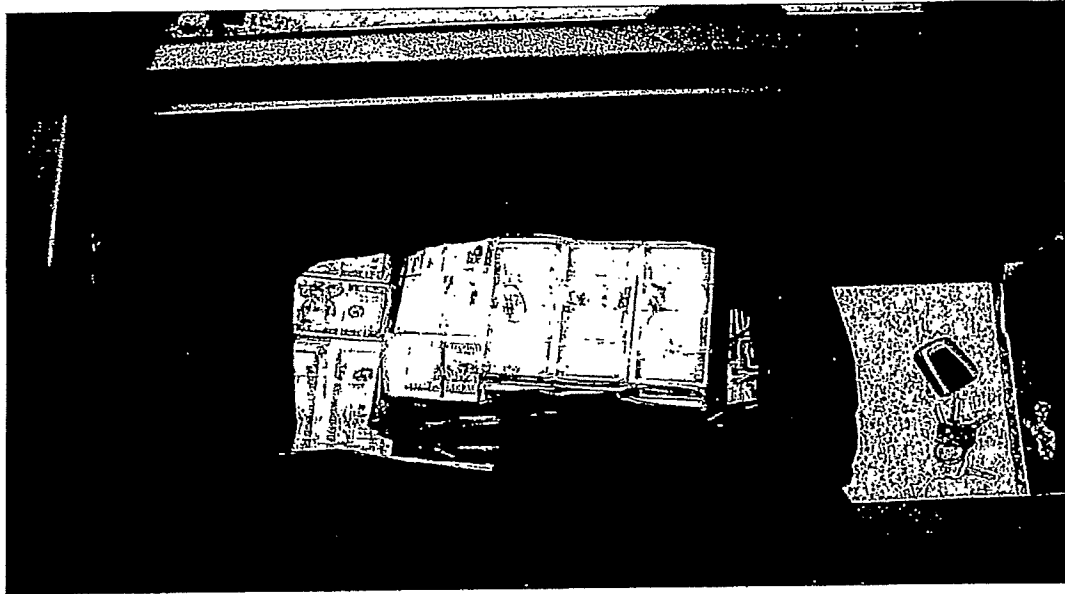
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1           33. Throughout the house, detectives located processed marijuana, vacuum sealers, vacuum  
2 sealing bags, concentrated cannabis/hash oil, branded marijuana products in a display case, documents  
3 showing sales invoice/shipping manifest for marijuana, a money counter, cultivation documents (with  
4 strains, harvest date and plant count), and other documents that support a large scale cultivation and  
5 manufacturing hub.



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14           34. Law enforcement found documents, mail, and other indicia for PATEL in the Master  
15 Bedroom of the house, including a Sentient Law Group business check book and an envelope with the  
16 name "Naresh Patel" on it. A large safe was located in PATEL's bedroom, which contained a certificate  
17 for a Learjet 25D, tail number N25CY, and a duffle bag with \$389,310 in cash. The \$389,310 in cash  
18 was broken down into vacuum-sealed in rubber-banded stacks.

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12 35. In [REDACTED] bedroom, detectives located: approximately \$37,200 in cash (\$3,000 in his  
13 bathroom and \$34,200 in his nightstand), two large glass jars containing approximately ¼ to ½ pound of  
14 processed marijuana, a digital scale, a box for another digital scale, and a glass jar that had “Nug  
15 Forbidden Fruit \$40” in the top label (which appeared to be a packaged marijuana product line).  
16 Detective Gualco also located documents showing a link to 8178 Belvedere Avenue, Sacramento, a  
17 known historical marijuana grow site.

18 36. Detective Gualco then observed the Mercedes Sprinter Van (parked on the property near  
19 the front entrance) that had previously observed at the residence. When Detective Gualco opened the  
20 doors to the van, he immediately smelled the odor of marijuana emanating from inside the vehicle. He  
21 located numerous moving boxes inside the vehicle, with dirt and a strong odor of marijuana, and noticed  
22 soil and green leaves on the floor of the truck. The green leaves appeared to be from marijuana plants.  
23 Detective Gualco also walked around several cars parked outside the garage area and noticed similar soil  
24 and leaves around a white Dodge Ram truck belonging to William McClean.

25 37. Detective Gualco walked around the garage and noticed water staining on the ground,  
26 which is where the painter was hired to put the epoxy. The staining appeared to have round circles and  
27 run off from suspected potting plants. Based on his training and experience, Detective Gualco believed  
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1 this staining was consistent with soil, fertilizer and water often used in indoor marijuana cultivation. He  
2 also noticed several carbon monoxide tanks outside the garage, which are also used for indoor marijuana  
3 cultivation. Additionally, several large "Pelican Brand" hard cases were outside of the door, which are  
4 marketed as "water-tight vaults" and in Detective Gualco's training and experience are commonly used  
5 to transport marijuana/concentrated cannabis products. Pelican Brand Cases form airtight seals and are  
6 known to be used by drug traffickers to prevent detection from K9's. Inside of the Pelican cases,  
7 Detective Gualco found scent packs commonly used by drug traffickers to mask and remove the odor of  
8 marijuana.

9 **F. Search of PATEL's Learjet**

10 38. Following the searches of Suite D and the Granite Bay Residence, law enforcement  
11 continued to investigate PATEL and learned that his Learjet had landed in Sacramento on June 9, 2019.  
12 PATEL's Learjet was believed to be at Mather Air Field in Sacramento County. A flight plan for the  
13 Learjet indicated that it would be in Sacramento for approximately 4 days before departing for the East  
14 Coast on June 13, 2019. The flight plan showed the Learjet was scheduled to fly to Colorado, then  
15 Illinois, and then New Jersey.

16 39. On June 13, 2019, PCSD detectives conducted surveillance at Hangar #2 at 10510  
17 Superfortress Avenue at Mather Field Airport in Sacramento County. At 10:15 am, Detective Gualco  
18 arrived at Mather Field and saw the doors open to the hangar where the Learjet was parked. The ground  
19 crew appeared to be getting ready to pull the plane out, but then left and closed the hangar door. As they  
20 conducted surveillance, detectives observed two males and two vehicles near the hangar. The vehicles  
21 were a Dodge Caravan bearing California license plate 8EDV674 (hereinafter, the "Dodge"); and Nissan  
22 Maxima bearing New Jersey plate Y71JMR (hereinafter, the "Nissan"). The Nissan, which was  
23 registered to Cho, was previously observed by detectives at the Granite Bay Residence.

24 40. At approximately 11:15 a.m., one of the two males, later identified as [REDACTED]  
25 [REDACTED], exited the Nissan, which was parked near the Hangar #2, and walked into the  
26 Hangar #2. [REDACTED] remained inside Hangar # 2 for a few minutes and then walked back out to the Nissan.  
27 At approximately 12:00 pm, Detective Gualco saw the target hangar door open, and the Dodge drove out  
28 of the hangar and exited the tarmac from the gate near the hangars. The Dodge pulled up next to the

