| AO 91 (Rev. 11/11) Criminal Complaint | No. |
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| Unitei | O STATES DISTRICT COURT U.S. DISTRICT COURT - N.D. OF N.Y. |
| UNITED STATES OF AMERICA v. | for the Northern District of New York) APR 0 9 2024 AT O'CLOCK John M. Bornes of |
| LUIGGI CANESSA |) Case No. 1:24-MJ- 189 (CFH) |
| Defendant | |
| 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 February 13, 2024 in the | ne county of Albany in the Northern District of New York the defendant |
| violated: | |
| Code Section 21 U.S.C. §§841(a)(1), (b)(1)(B) | Offense Description Distribution of a Controlled Substance (5 grams or more of methamphetamine) |
| This criminal complaint is based on the See attached affidavit Continued on the attached sheet. | \wedge |
| | Complainant's signature |
| | FBI Special Agent David Quaid Traves Printed name and title |
| Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure. | |
| Date: April 9, 2024 | a where |
| | Judge's signature |
| City and State: Albany, NY | Hon. Christian F. Hummel, U.S. Magistrate Judge |
| | Printed name and title |

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, David Quaid Traves, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I make this affidavit in support of a criminal complaint charging LUIGGI CANESSA with distributing a controlled substance (methamphetamine), in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), by knowingly and intentionally distributing five grams or more of pure methamphetamine.
- 2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since September 25, 2022. I attended the FBI Academy in Quantico, Virginia from September 2022 to February 2023 where I completed FBI New Agent Training. This training included instruction on applying for and executing search warrants, conducting criminal investigations, and obtaining and handling evidence, among other things. I am currently assigned to the Albany Field Office where my duty assignment is with the Capital District Safe Streets Gang Task Force (SSTF) in Albany, New York. In that assignment, I work with federal, state, and local law enforcement agents and officers in investigating criminal activities such as violent crime and narcotics trafficking.
- 3. Prior to my employment as a Special Agent with the FBI, I was a sworn law enforcement officer in the city of Dublin, Ohio for six years. I attended the police academy at the Columbus Police Department from June 2016 to January 2017 where I was issued an Ohio Peace Officer Training Academy certificate. While serving as a police officer, I spent three years as a patrol officer enforcing traffic laws and investigating both misdemeanor and felony criminal

offenses. The last three years was spent as a first line supervisor in both patrol and investigations. While supervising the investigations section, I oversaw investigations into narcotics, human trafficking, and other crime trends within the city of Dublin.

4. During my career in law enforcement, I have taken part in numerous narcotics investigations and numerous narcotics-related training classes instructed by local, state and federal agencies. I have arrested numerous individuals for violations of federal and state narcotics laws. I have participated in the execution of many search warrants resulting in the seizure of narcotics and proceeds thereof. Additionally, I have interviewed and worked with reliable confidential informants, whose assistance resulted in the controlled purchases of narcotics and guns, and the introduction of undercover police officers to persons who engage in the sale of narcotics and guns. Because of these experiences, I am familiar with the coded language, conduct, and customs of people engaged in the conspiracies to violate the drug, gun and money laundering laws of New York and the United States.

PROBABLE CAUSE

5. Since late 2023, the FBI has been engaged in investigating a wide array of crime occurring at Shenanigans Gentlemen's Club (Shenanigans) and the adjoining business, Sheer Pleasure Lingerie (Sheer Pleasure) in Schenectady, New York. The conduct under investigation involves drug trafficking, sex trafficking, and wire fraud. At all times relevant to the investigation, CANESSA has been the General Manager of both Shenanigans and Sheer Pleasure. CANESSA lives in a home less than 300 feet from Shenanigans.

¹ Shenanigans, Sheer Pleasure, and CANESSA's home are all in Albany County notwithstanding their Schenectady addresses.

- 6. On February 13, 2024, a confidential human source (CHS) conducted a controlled narcotics purchase from CANESSA at CANESSA's Home.² Prior to the transaction, the CHS called CANESSA using phone number (518) [redacted]-0007, spoke with CANESSA, and arranged to purchase methamphetamine.³ The CHS went to CANESSA's residence while under physical surveillance and wearing a concealed recording device. The CHS observed CANESSA go inside of his residence, and a short time later, CANESSA opened his front door and the CHS provided CANESSA with prerecorded buy money in exchange for methamphetamine. Subsequent analysis revealed that the substance CANESSA provided to the CHS was more than 5 grams of actual methamphetamine.
- 7. I have reviewed subpoena returns which indicate that CANESSA lives at the residence where he sold controlled substances to the CHS. I have also reviewed surveillance footage which indicates that CANESSA has engaged in numerous other apparent drug transactions in a similar manner to which he sold controlled substances to the CHS.
- 8. After being advised of and waiving his *Miranda* rights, CANESSA admitted to distributing methamphetamine, cocaine, marihuana, and MDMA from his residence.

² The CHS is cooperating in order to work off criminal charges. The CHS has a criminal history involving assault and controlled substances. The allegations contained in this affidavit were corroborated by audio-video recording and, thus, I find CHS to be a credible and reliable.

³ Redacted information is available to the Court upon request.

CONCLUSION

9. Based on the forgoing, there is probable cause to establish that LUIGGI CANESSA has violated 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) by knowingly and intentionally distributing five grams or more of pure methamphetamine.

David Quaid Traves

Special Agent

Federal Bureau of Investigation

I, the Honorable Christian F. Hummel, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant on April 9, 2024, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Hon. Christian F. Hummel United States Magistrate Judge