

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of West Virginia

United States of America

v.

Chandra K. Ross

Case No.

2:13-mj-00089

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 July 18, 2013 in the county of Kanawha in the Southern District of West Virginia, the defendant(s) violated:

Code Section

21 U.S.C. Section 841(a)(1)

Offense Description

Possession with intent to distribute heroin.

This criminal complaint is based on these facts:

On or about July 18, 2013, defendant Chandra Ross possessed with intent to distribute heroin, a Schedule I controlled substance.

Continued on the attached sheet.

Complainant's signature

Complainant's signature

Detective Don A. Sculock

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/25/2013

Judge's signature

Judge's signature

City and state: Charleston, West Virginia

Dwane L. Tinsley, U.S. Magistrate Judge

Printed name and title

A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to-wit:

I, Don A. Scurlock, being first duly sworn, do hereby depose and state as follows:

1. I have been a detective with the Nitro Police Department for over 17 years. I am currently assigned to the Kanawha Bureau of Investigations. As part of my duties with the Kanawha Bureau of Investigations I have been involved in an investigation of a heroin conspiracy involving Chandra Ross.

2. On July 18, 2013, myself along with several other law enforcement officers executed search warrants on Ms. Ross's person and at her apartment. Ms. Ross lives at 1033 Lawndale Lane, Charleston, West Virginia.

3. Ms. Ross had \$1,701.00 in United States currency in her purse when we executed the search warrant. In her apartment, she had approximately \$26,825.00 in United States currency. She also had approximately 3½ ounces of heroin (110 grams with packaging). A portion of the heroin recovered from her apartment was field tested and it tested positive for heroin. In addition to the currency and heroin, we also recovered three handguns in close proximity to the currency and the drugs. We recovered a Remington .45 caliber handgun which

had been previously reported stolen. We recovered a Taurus .22 Magnum handgun with an obliterated serial number that had also been reported stolen. We recovered an A.A. Arms 9mm handgun.

4. Through our investigation we learned that Ms. Ross lived in the apartment with her three minor children.

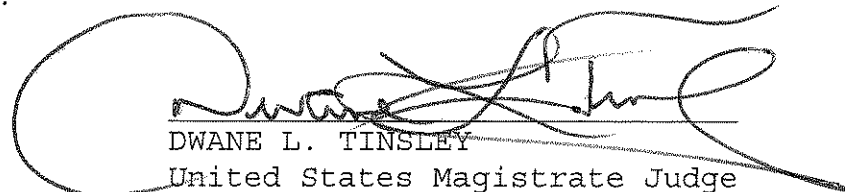
5. Based on my experience, the recovered heroin was clearly a distribution amount. Heroin is a Schedule I controlled substance.

Further your affiant sayeth naught.



Don A. Scurlock
Detective, Nitro Police Department

Sworn to before me, and subscribed in my presence, this
25th day of July 2013.



DWANE L. TINSLEY
United States Magistrate Judge