

UNITED STATES DISTRICT COURT for the

MAY 24 2012

	Eastern District of Arkansas		JAMES W. McCORMACK, CLERK By:	
United States of America v. Mark Anthony Jones and Randall Tremayn Robinson Defendant(s)))))	ase No. 4:12-MJ- 30	78-JIK	DEP CLERK
CRIMINAL COMPLAINT				•
I, the complainant in this case, stat On or about the date(s) of 1-4-2012 t Eastern District of Arka	_	the county of	owledge and belief. Pulaski	in the
Section 846, and por Title 21, United States Code, As Section 841, 846 and Title 18, United States Code, Section 2, and	onspiracy to aid and abet ounds of marijuana ttempting to aid and abet ounds of marijuana ossessing a firearm in fur	the possession with in	tent to distribute 1000	
This criminal complaint is based o	on these facts:			
See Attached Affidavit.	·			
Continued on the attached shee		FBI Specia	ainant's signature Agent J.T. Coleman ed name and title	·
Sworn to before me and signed in my pres	ence.	. ,		
Date: 05/24/2012	-	Tu fru	lge)s signature	
City and state: Little Rock, A	Arkansas		J rate Judge Jerome T. K ed name and title	earney

AFFIDAVIT

- I, J. T. Coleman, being duly sworn, depose and state that:
- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been employed with the FBI since September, 1998. I graduated from the FBI Basic Academy in Quantico, Virginia. While at the Academy, I received training in numerous areas, including but not limited to, narcotics, trafficking, public corruption, and money laundering. During the course of my employment with the FBI, I have participated in investigations which involved the use of undercover officers, confidential informants, cooperating witnesses, physical surveillance, PEN registers, trap and trace devices, consensual recordings and monitoring, drug evidence purchases, search warrant, arrest warrants, subject interviews and Title III applications and monitoring.
- 2. As a result of my training and experience as a Special Agent of the FBI, I am familiar with federal criminal laws relating to drug trafficking, firearms, and money laundering. I know that it is a violation of Title 21, U.S.C. Section 841 and 846, Title 18 U.S.C. Section 2 to conspire to, or attempt to aid and abet the possession with the intent to distribute marijuana, and that it is a violation of Title 18, U.S.C. 924(c) to possess a firearm in furtherance of a drug trafficking crime.
- 3. I submit this Affidavit in support of a criminal complaint and arrest warrant for MARK ANTHONY JONES and RANDALL TREMAYN ROBINSON. My belief that probable cause exists to arrest MARK JONES and RANDALL ROBINSON for the

commission of one or more federal criminal offenses is based on the following facts that I have learned from this investigation, as well as from information supplied to me by other law enforcement officers. Since this Affidavit is for the limited purpose of establishing probable cause to support the Criminal Complaint and arrest warrants, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the activities, entities, individuals, and events described in this Affidavit.

- 4. From April 2010 through May 2012, the Little Rock Field Office of the Federal Bureau of Investigation (FBI) has been involved in a joint investigation with the Little Rock Police Department (LRPD) concerning the illegal activities of two LRPD Patrol Officers, who are also half-brothers, MARK JONES and RANDALL ROBINSON.
- 5. This investigation focused on, among other things, JONES' and ROBINSON'S involvement in the distribution of narcotics. During the course of this investigation, JONES was involved in the protection in 2012 of three controlled drug deliveries while driving a marked patrol car, on-duty, armed and in uniform. These deliveries totaled a purported quantity of approximately 1,400 pounds of pharmaceutical grade marijuana. ROBINSON was involved with JONES in the protection of the third controlled drug delivery involving a purported 1000 pounds of marijuana. ROBINSON was driving a marked patrol car, on-duty, armed and in uniform while protecting the third marijuana delivery.
 - 6. Information pertaining to the first two controlled drug deliveries involving

JONES is being presented herein as follows:

- a. On January 4, 2012, CHS-1 telephonically contacted MARK JONES.

 During this recorded conversation, CHS-1 arranged to meet with JONES between 7:00 p.m. and 10:00 p.m. on this same date at Whole Foods where JONES was going to be working an off-duty security job.
- b. On January 4, 2012, CHS-1 met with MARK JONES at Whole Foods.

 During this recorded meeting, CHS-1 advised that he/she was trying to make a trip to

 California (CHS-1 made frequent trips to California and JONES had previously

 commented that he believed CHS-1 to be working with the [drug] Cartels).

JONES asked, "What you trying to do?"

CHS-1 advised, "I be on that herb (marijuana). Talking about that good, good, good."

JONES asked, "What you need me to do?"

CHS-1 replied, "I need a mother fucker to watch my back. I'll have all the logistics down when I get back, but I'm pretty much probably going to need..."

JONES interjected, "Follow you?"

CHS-1 responded, "Just watch my back while I get what I need so in case one of your partners (police) shows up, the mother fucker don't just whack a mother fucker's ass."

JONES advised, "Its always best to do your business at the mall."

CHS-1 responded, "No, it ain't about the business. Its getting what I need to get. Its coming to me."

JONES asked, "How much you talking about?"

CHS-1 replied, "It's going to be some boxes."

JONES said, "Oh, nothing you can do on a motorcycle?"

CHS-1 replied, "Like I told you, its herb. You can't get away on no motorcycle on herb. It ain't worth the money."

JONES advised, "Just tell me what you need. Just plan it out and tell me what you need."

c. On 01/09/2012, CHS-1 telephonically contacted MARK JONES. CHS-1 made arrangements for JONES to meet with him/her at CHS-1's house at 9:00 a.m. the following morning. During this recorded conversation, CHS-1 asked, "You working tomorrow?"

JONES responded, "Yeah, I'll be at work."

CHS-1 asked, "What time you work?"

JONES replied, "5:45 in the morning."

CHS-1 asked, "You think you can slide by my house about 9:00 or so?"

JONES agreed, "Just tell me when you want me to come by there. I'll be by there."

CHS-1 advised, "...I'm telling you right now..."

JONES responded, "I'm gonna be there. You just got to call me and remind me or text anyway."

CHS-1 stated, "I'm gonna text you about 8:30 and you just be there around 9:00 because she'll (CHS-1's girlfriend) be gone. That way I can holler at you."

JONES responded, "Alright."

d. On January 10, 2012, CHS-1 met with MARK JONES at CHS-1's residence. During this recorded meeting, CHS-1 asked, "You work every day this week?" JONES affirmed, "Every day."

CHS-1 asked, "Thursday?"

JONES affirmed, "Yeah."

CHS-1 asked, "Same time?"

JONES affirmed, "Same time."

CHS-1 advised, "My folks (suppliers) are supposed to be coming through. Here's the deal though. They want to meet off the 430 (Interstate 430) so they can be right back on the highway and be gone. So the meet is going to be off Colonel Glenn by the hotel."

JONES responded, "Uh huh, I know where you at."

CHS-1 continued, "They said they gonna be there around eight o'clock, but they gonna call me when he on the 430."

JONES clarified, "In the morning?"

CHS-1 responded, "Yeah. So I'm gonna have a little van to meet him to get everything out of his rig. Then I just need you to follow me to Shackleford to a little safe spot."

JONES asked, "Who in the van?"

CHS-1 replied, "Just me."

JONES asked, "You the only one who knows about this?"

CHS-1 responded, "On this end? Hell yeah!"

JONES said, "Alright. Start about eight o'clock in the morning?"

CHS-1 confirmed, "You should be up there about eight o'clock."

JONES asked, "How far we got to go?"

CHS-1 advised, "...almost Shackleford. Over by where Frankie's was."

JONES stated, "Okay. All I know...I don't know about what you're doing. All I know is you're picking up stuff for your store and you need me to follow you from 430."

JONES went on to ask, "Just follow you to unintelligible."

CHS-1 responded, "Close enough to where I don't get pulled over cause I'm gonna have boxes [of marijuana]."

JONES stated, "I can do that."

CHS-1 reiterated, "I'm gonna have boxes like a mother fucker."

CHS-1 subsequently showed JONES a sample of the marijuana that would be in the boxes and asked, "What you want out of it?"

JONES responded, "We'll talk about it."

e. On January 11, 2012, CHS-1 telephonically contacted MARK JONES.

CHS-1 was attempting to finalize arrangements with JONES for the security of a shipment of marijuana on the following morning. During this recorded conversation, JONES asked, "How much is that deal?"

CHS-1 asked, "The phone?"

JONES responded, "No. That deal. How much is that deal?"

CHS-1 responded, "Huh?"

JONES stated, "You never did give me a price."

CHS-1 said, "Oh shit. I asked you."

JONES advised, "I don't know nothing about it. I'm trying to see what its worth. What's it worth?"

CHS-1 replied, "I mean, what are you looking for man? I be trying to be fair. You trying to know what everything worth on the thing?"

JONES responded, "No! Uh uh! No...no...uh uh! I don't want to know nothing."

CHS-1 questioned, "What are you asking?

JONES advised, "Go ahead and of what you're doing and hit me when you get done."

f. On January 12, 2012, CHS-1 telephonically contacted MARK JONES. CHS-1 was attempting to set up a meeting with JONES to finalize arrangements for JONES' security of a marijuana shipment scheduled for this same date. During this recorded conversation, CHS-1 said, "Shit, I was blowing you up last night man." JONES responded, "Yeah, I know. That's a high priority thing. We should have been taking care of business unintelligible."

CHS-1 replied, "You said what happened?"

JONES responded, "We should have been taking care of business man instead of doing that all the sudden."

CHS-1 asserted, "I had called you."

JONES reiterated, "We should have been taking care of business. That's a big step."

After discussing the lack of communication, JONES stated, "Give me ten minutes."

CHS-1 asked, "Alright. You want me to go back in my neighborhood?"

JONES responded, "Yeah."

- g. On January 12, 2012, MARK JONES provided security over the controlled delivery of a purported 200 pounds of pharmaceutical grade marijuana wherein JONES followed the vehicle containing marijuana from a transfer location to a separate storage location. JONES' interaction with CHS-1 during this controlled delivery was recorded by CHS-1. Additionally, JONES' activity during this controlled delivery was documented through both aerial video surveillance and ground surveillance. On the same day as this controlled delivery, but prior to receiving his payment from CHS-1, JONES was observed meeting with his half brother, Little Rock Police Department Patrol Officer RANDALL ROBINSON, who was driving a marked patrol car, on-duty and in uniform. This meeting was video recorded via aerial surveillance. Further, pen register and toll records identified 4 telephone calls and 20 text messages between JONES and ROBINSON on this date.
- h. On January 12, 2012, CHS-1 telephonically contacted MARK JONES.

 CHS-1 let JONES know he could come by CHS-1's place of business to get his payment for the security he just provided over the receipt of a marijuana shipment. During this

recorded conversation, CHS-1 said, "Okay, you can come holler at me. I been chillin.

Ain't nobody up here. Its dead as a mother fucker today." JONES responded, "...I'll be right there."

- i. On January 12, 2012, MARK JONES obtained a \$2,000 payment at CHS-1's place of business in return for the security he had provided over the receipt of a marijuana shipment. JONES' interaction with CHS-1 during this payment was recorded by CHS-1. Additionally, this payment was recorded via CCTV¹ both inside and outside CHS-1's business. Money being exchanged from CHS-1 to JONES can be seen on the video recording.
- j. On January 12, 2012, CHS-1 returned a telephone call to MARK JONES.

 During this recorded conversation, JONES advised, "That's a nice little old deal there
 man."

CHS-1 said, "Huh?"

JONES repeated, "That's a nice little old deal there. That's a nice little show you put on there."

CHS-1 responded, "Oh yeah. You like that?"

JONES replied, "Yeah. Seems like you're a good promoter. Know what you're doing." CHS-1 responded, "Man. Try to be...try to be."

JONES replied, "Yeah...yeah, for sure. Okay man, holler at your boy."

¹ A CCTV was previously installed by CHS-1 for business purposes. With CHS-1's consent, FBI installed a second CCTV.

k. On January 23, 2012, CHS-1 telephonically contacted MARK JONES.

CHS-1 called JONES to check on his availability for participation in the protection of another drug shipment. During this recorded conversation, CHS-1 asked, "Your schedule ain't changed no time soon, is it?"

JONES responded, "No. Uh uh."

CHS-1 asked, "So, you be good in about another week?"

JONES confirmed, "Yeah..."

CHS-1 stated, "That's what's up."

JONES continued, "...oh yeah."

CHS-1 said, "We'll get together, have a drink, and toss it up or something."

JONES replied, "Let's do that...let's do that. Talking about bringing another show through?"

CHS-1 confirmed, "Yeah. Probably in about another week."

JONES replied, "Alright. Bet."

CHS-1 advised, "Yeah, probably gonna happen in the same venue too."

JONES responded, "Okay. Bet that...bet that...bet that...bet that...bet that...bet isten to me.

Don't be like unintelligible man. Listen to me. I got a."

CHS-1 said, "Man its all good man. Shit, listen to me. Shit."

JONES advised, "Oh, you don't have to worry about it. I got a...I got a B."

CHS-1 replied, "Its all good."

JONES said, "Alright, holler at me when you're ready to meet up."

1. On January 29, 2012, CHS-1 met with MARK JONES at Whole Foods to confirm JONES' availability to protect a drug shipment on the up coming Tuesday.

During this recorded meeting, JONES asked, "What you got up?"

CHS-1 responded, "You working Tuesday?"

JONES confirmed, "Yeah."

CHS-1 stated, "That's what's up?"

JONES asked, "So what you got man?"

CHS-1 answered, "Shit. Same thing."

JONES queried, "Same route? How long you been doing that same thing?"

CHS-1 responded, "Huh?"

JONES repeated, "How long you been running that same pattern? You ever change up?"

CHS-1 replied, "Let me do that. Let me do what I do."

JONES responded, "New nigger. Its us now. So if you're running the same pattern..."

JONES continued, "...you do what you do, but I'm letting you know some information.

Don't keep running the same exact pattern."

CHS-1 responded, "Trust me...trust me. Feel me? I'm straight. It ain't the same exact pattern. Its something totally different.

JONES asked, "About the same time?" CHS-1 advised, "Uh, earlier."

m. On January 30, 2012, CHS-1 telephonically contacted MARK JONES.

CHS-1 arranged to meet with JONES on this same date at the Holiday Inn where JONES was going to be working an off-duty security job. During this recorded conversation, CHS-1 asked, "What you got going this evening?"

JONES replied, "Uh, fixing to go play ball with my boys. Then I'm going to the Holiday Inn. I got to be at the Holiday Inn at eight o'clock."

CHS-1 said, "Oh, you got to work? Okay, how long you gonna be down there?"

JONES answered, "Till mid-night."

CHS-1 advised, "Okay. Shit, I'm gonna swing down on you then."

JONES replied, "Gotha. Okay."

n. On January 30, 2012, CHS-1 met with MARK JONES at the Holiday Inn where JONES was working an off-duty job. During this recorded meeting, CHS-1 asked, "Hey, what time you say your thing start...your shift?" JONES replied, "5:45. Be on the street at 6:45."

CHS-1 advised, "Okay. Shit, I guess, shit, you could be at the same spot like about 7:45."

JONES replied, "Okay."

CHS-1 and JONES had a short discussion about the previous drug delivery then JONES asked, "Hey. How long am I going to have to do this off-duty shit? Man, when can I retire from this shit? You want to help me get out of this shit man?"

CHS-1 responded, "You was asking me my goals, what's your goals nigga?" After a short discussion,

JONES advised, "I want to be comfortable B. I ain't gonna lie."

CHS-1 asked, "What's comfortable to you? Every nigga got a different comfort though."

JONES answered, "I don't know. I think I'd be happy with a hundred thousand sitting off to the side." After discussing this goal for a while, CHS-1 explains his/her process of receiving the marijuana from his/her supplier and what he/she pays for the drugs.

Towards the end of this conversation, JONES states, "Good little old operation man. I can roll with that. I can roll with it."

CHS-1 subsequently advised, "Turn your shit (phone) on about 6:30." JONES replied in the affirmative.

o. On January 31, 2012, MARK JONES provided security over the controlled delivery of a purported 200 pounds of pharmaceutical grade marijuana wherein JONES followed the vehicle containing marijuana from a transfer location to a separate storage location.. JONES' interaction with CHS-1 during this controlled delivery was recorded by CHS-1. Additionally, JONES' activity during this controlled delivery was documented through both aerial video surveillance and ground surveillance. p. On January 31, 2012, at approximately 9:47 a.m., MARK JONES obtained a \$2,000 payment at CHS-1's place of business in return for the security he had provided over the receipt of a marijuana shipment. JONES' interaction with CHS-1 during this payment was recorded by CHS-1. Additionally, this payment was recorded via CCTV both inside and outside CHS-1's business. The exchange of money from CHS-1 to JONES can be seen on the video

recording. After completing this controlled delivery and receiving his payment from CHS-1, JONES was observed meeting with his half brother, Little Rock Police Department Patrol Officer RANDALL ROBINSON, who was off-duty and driving his personal vehicle. This meeting was video recorded via aerial surveillance. Further, pen register and toll records identified 4 telephone calls between JONES and ROBINSON during the time frame of this meeting.

- 9. Information pertaining to the third controlled drug delivery, involving both JONES and ROBINSON, is being presented herein as follows:
- a. On February 23, 2012, with JONES having already provided security over two controlled drug deliveries for a Confidential Human Source (CHS-1), JONES traveled with CHS-1 to Los Angeles, California, to allow JONES to meet an FBI Undercover Agent (UCA-1) who was being introduced as CHS-1's drug trafficking counterpart on the west coast.
- b. On February 23, 2012, CHS-1, UCA-1, and JONES met over dinner where JONES was introduced to UCA-1 as a Little Rock police officer. During this recorded meeting, CHS-1 and UCA-1 discussed, in the presence of JONES, increasing the size of their marijuana loads from 200 pounds to 1,000 pounds in an effort to decrease the risk of multiple cross country trips.
- c. On February 23, 2012, immediately following the above referenced meeting between CHS-1, UCA-1 and JONES, a discussion ensued between CHS-1 and JONES

concerning the need for additional security. During this recorded conversation, the following was said:

CHS-1 asked JONES, "How many mother fuckers you work with that are cool on your shift?

JONES responded, "I don't fuck with nobody but my brother man."

CHS-1 replied, "Your brother don't work your shift though."

JONES corrected, "Oh yes he do too."

CHS-1 asked, "Your brother work your shift?"

JONES responded, "Yeah, work the same shift."

CHS-1 stated, "I thought your brother worked like night times or something."

JONES responded, "No, no days."

CHS-1 stated, "For real?"

JONES replied, "Yeah, we out there together. Me, him, and Ronnie."

CHS-1 asked, "You don't fuck with Ronnie though, huh?"

JONES answered, "Not on that level. He like a brother to me though."

CHS-1 asked, "What about your brother though?"

JONES responded, "He's my brother."

CHS-1 stated, "I mean, you know what I'm saying though."

JONES replied with something unintelligible.

CHS-1 asked, "So for a couple of dollars, you can make sure my boy (UCA-1) is straight?

JONES replied, "Yeah."

CHS-1 asked, "For sure?"

JONES stated, "I'm sure."

CHS-1 noted, "You ain't even hollered at him and you're saying that."

JONES responded, "I know my brother."

d. On February 28, 2012, CHS-1 met with JONES at Whole Foods in Little Rock, Arkansas. During this recorded meeting, the following was said:

CHS-1 asked, "Hey. Check it out. You talk to your folks, Randy (RANDALL)

ROBINSON)?" JONES responded, "I ain't talked to him yet, but when it get ready to go down, I will."

CHS-1 stated, "Man, you need to talk to him before then my nigga."

JONES replied, "It ain't gonna be no problem."

CHS-1 continued to discuss the need to get everybody on board.

JONES stated, "Okay. All I need to know is what's in it for him?"

CHS-1 asked, "So, you paying him or I'm paying ya'll both?"

JONES responded, "I thought you were going to pay both. You want to do something..."

CHS-1 interrupted, "No, we gonna pay ya'll both. But what I'm saying is, I don't know how you and your brother get down."

JONES replied, "I just need to know what to tell him so I can tell him what he's getting out of the deal. That's the first thing he's going to ask."

CHS-1 asked, "Five (\$5,000) apiece straight?"

JONES responded, "Yeah."

CHS-1 repeated, "Five a piece straight?"

JONES affirmed, "Yeah!" It is your Affiant's belief that JONES was agreeing that he and his brother (ROBINSON) would provide security over a drug shipment in return for \$5,000 each.

e. On March 5, 2012, CHS-1 telephonically contacted JONES. CHS-1 let JONES know that he/she was going to have to postpone the drug shipment scheduled for March 15, 2012. During this recorded conversation, CHS-1 stated, "We got to reschedule that concert man."

JONES responded, "Straight. Okay. Alright."

f. On March 6, 2012, CHS-1 telephonically contacted JONES. CHS-1 told JONES know that he/she had rescheduled the drug shipment. During this recorded conversation, CHS-1 said, "Shit uh, we rescheduled the show.

JONES responded, "Okay. You got a date?"

CHS-1 replied, "22nd."

CHS-1 replied, "Yeah."

JONES responded, "22nd? Unintelligible or you gonna bring it?"

CHS-1 asked, "Huh? All the same people."

JONES stated, "Okay. I'll have to check unintelligible."

CHS-1 asked, "I mean, everything still the same on your end, right?"

JONES replied, "Yeah, what day is that on?"

CHS-1 answered, "Thursday."

JONES responded, "Yeah...cool...straight...alright."

CHS-1 asked, "Everything cool for sure, right?"

JONES affirmed, "Yeah. Oh yeah."

g. On March 14, 2012, CHS-1 met with JONES to discuss security arrangements for a drug shipment scheduled to arrive on March 22, 2012. During this recorded conversation, CHS-1 stated, "We got to get together and get this shit right man."

JONES responded, "Yeah, for sure."

CHS-1 stated, "That's real man."

JONES asked, "Dates still the same?"

CHS-1 answered, "Yep. So, I got to make sure this shit right man."

JONES asked, "So, two vehicles gonna be enough to unload everything?"

CHS-1 responded, "Yep..."

CHS-1 and JONES discuss the route the two vehicles would have to take. CHS-1 advised, "I want everything to be just tight. You know what I'm saying?"

JONES responded, "oh, its gonna be tight. Its gonna be ready."

CHS-1 advised, "That's why I want to get with ya'll."

JONES responded, "No. I'll take care of all this."

JONES stated, "I'll take care of it. I got that end...I got that end. I got this end. You just handle that end."

JONES went on to say, "I don't want to tell him anything. He gonna know what he supposed to do. That's all he need to know is what he's supposed to do."

h. On March 22, 2012, JONES and his brother ROBINSON provided security over the controlled delivery of a purported 1,000 pounds of pharmaceutical grade marijuana, wherein JONES and ROBINSON each followed vehicles containing marijuana from a transfer location to two separate storage locations in Little Rock, Arkansas². JONES' interaction with CHS-1 during this controlled delivery was recorded by CHS-1. Additionally, JONES' and ROBINSON'S activities during this controlled delivery were documented through both aerial video surveillance and ground surveillance. Both JONES and ROBINSON were driving marked patrol vehicle, on-duty, armed and in uniform. While ROBINSON was providing security to one vehicle, a shooting occurred in west Little Rock, and all police cars were ordered to respond. As other police cars were traveling to the scene of the shooting, they passed ROBINSON's patrol car following the vehicle with the marijuana. This was captured on the video cameras of the police cars responding to the scene as they had their lights and sirens engaged.

² The marijuana was delivered via a tractor/trailer rig being driven by an undercover agent and subsequently transferred to two rental vans being driven by CHS-1 and UCA-1 for transport to two separate storage units.

- i. On March 22, 2012, following the completion of the above referenced controlled drug delivery, CHS-1 texted JONES to have him come pick up his payment for the security he and his brother, ROBINSON, had just provided over a drug shipment.
- j. On March 22, 2012, MARK JONES arrived at CHS-1's place of business and obtained two packages, each containing a \$5,000 cash payment, for the security he and ROBINSON had just provided over the receipt of a marijuana shipment. JONES' interaction with CHS-1 during this payment was recorded by CHS-1. Additionally, this payment was recorded via CCTV both inside and outside CHS-1's business. JONES subsequently met with ROBINSON in the parking lot of the Little Rock Police Department's Northwest substation. After completing this controlled delivery and receiving his payment, JONES was observed meeting with ROBINSON, when was still driving his marked patrol car, on duty and in uniform in the parking lot of the little Rock Police Department Northwest Precinct. This meeting was video recorded. Further, pen register and toll records identified 7 telephone calls and 7 text messages between JONES and ROBINSON.
- 10. On May 2, 2012, ROBINSON called the CHS-1. On May 3, 2012, ROBINSON went to CHS-1's place of business to meet. This meeting was recorded by audio and video. During this meeting, CHS-1 asked ROBINSON whatever happened about the shooting on St. James Court on March 22, 2012. (This shooting occurred while ROBINSON was following the CHS-1 to the storage facility to deliver the marijuana.)

After this question, ROBINSON's demeanor noticeably changed. ROBINSON asked the CHS-1 how he knew about the shooting that happened during the time ROBINSON was following the CHS-1. The CHS-1 stated that he heard about this from some people. At this point the video shows ROBINSON's demeanor changing. Later during the conversation, CHS-1 thanked ROBINSON for following him. That is when ROBINSON got a huge smile on his face and said, "you're talking to a blind man, what are you talking about?" The CHS-1 said it two or three more times and ROBINSON said each time, "I don't know what you are talking about" with a big smile on his face. The topic of conversation was changed and ROBINSON then started talking about a man named Jason who was on the street ripping off drug dealers. ROBINSON then stated that Jason ripped off one of his friends of drugs. ROBINSON told the CHS-1 that he was going to find Jason and make Jason pay ROBINSON a fee for not getting arrested.

- 11. On May 3, 2012, after the meeting between ROBINSON and the CHS-1, the CHS-1 talked to JONES, and that meeting was recorded. The conversation involved them trying to set up another deal in which JONES and ROBINSON provided security. JONES told CHS-1 that his brother was not going to participate in the another deal because there was too much pressure. Later the UC talked to JONES and JONES told him the same thing, that ROBINSON was not going to participate because of all the pressure.
 - 12. As a point of reference, ROBINSON sold marijuana in quantities of from 1/2

ounce to 1 pound to a CI for law enforcement on July 9, 2009, July 27, 2009, August 4, 2009, March 25, 2010, and May 5, 2010.

13. As delineated herein, JONES and ROBINSON were involved in attempting to aid and abet the possession with intent to distribute marajuana, a controlled substance, as well as conspiracy to do the same, in violation of Title 21, U.S.C. 841(a)(1), 846, and Title 18, U.S.C. Section 2 respectively. Further, in as much as JONES and ROBINSON were armed during and in furtherance of these drug trafficking transactions, they are also in violation of Title 18, U.S.C. 924(c).

14. Based upon the above information, I believe that probable cause exists to conclude that MARK ANTHONY JONES and RANDALL TREMAYN ROBINSON knowingly conspired to possess with intent to distribute marijuana, attempting to aid and abet the possession with intent to distribute marijuana, and possessed a firearm in furtherance of a drug trafficking crime, in violation of Title 21, U.S.C. Section 846, 841 and Title 18, U.S.C. Section 2, and 924(c).

L. Coleman

Special Agent, Federal Bureau of Investigation

Subscribed and sworn to me this 24rd day of May, 2012

Jerophe T. Kearney

United States Magistrate Judge