

FILED

UNITED STATES DISTRICT COURT

for the

Eastern District of Arkansas

SEP 17 2012

IN OPEN COURT
JAMES W. McCORMACK, CLERK

BY: _____
DEPUTY CLERK

United States of America)
v.)
ROXANNE DAVIS)
)
)
)
)
)
)

Case No. 4:12-MJ-2039-JJV

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 May 24, 2012 and June 9, 2012 in the county of Lee in the Eastern District of Arkansas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1951(a)

obstructing, delaying, and affecting in any way and degree "commerce" and the movement of articles and commodities in commerce by "extortion," as those terms are defined in Title 18, United States Code, Section 1951; namely, obtaining money not due defendant or her office, by consent, under color of official right, namely, by misusing her authority as a state Parole/Probation officer to collect cash payments from drug traffickers under her supervision.

This criminal complaint is based on these facts:

See attached Affidavit of FBI Special Agent John Marsh.

Continued on the attached sheet.



Complainant's signature

FBI Special Agent John Marsh

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/17/2012



Judge's signature

City and state: Little Rock, Arkansas

Joseph J. Volpe, U.S. Magistrate Judge

Printed name and title

Affidavit

I, JOHN C. MARSH, being duly sworn on oath, depose and state as follows:

I. Introduction

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been employed as a Special Agent with the FBI since September 2006. I am currently assigned to the Little Rock Division, Marion Resident Agency, of the FBI since September 2010. Prior to my assignment to the Little Rock Division, I was assigned to the FBI Chicago Division, Violent Crimes Task Force. Prior to my appointment as a Special Agent, I was employed by the Mississippi Highway Patrol beginning in October 1996, ultimately as a Master Sergeant in the Criminal Investigation Bureau, Major Crimes Unit. I have received training in narcotics enforcement, money laundering, wire fraud, mail fraud, violent crimes, and asset forfeiture. During my time as a law enforcement officer, I have participated in numerous investigations of unlawful narcotics distribution, violent crimes, and public corruption, and have conducted or participated in physical and electronic surveillance including the use of court-authorized wiretaps, the execution of search warrants, the execution of seizure warrants, the debriefing of confidential informants, the debriefing of cooperating defendants, and reviews of recorded conversations.

2. I am personally involved in the investigation of the SUBJECT OFFENSES, and I am familiar with all aspects of this investigation. In addition to my personal knowledge, the statements contained in this Affidavit are based in part on: information

provided by other federal, state, and local law enforcement personnel, including written investigative reports; information provided by confidential sources of information working with the FBI and/or other federal, state, and local law enforcement agencies; review of court-authorized intercepted conversations; visual surveillance; analysis of pen register and trap and trace device data; analysis of telephone toll records; records maintained by the National Crime Information Center (NCIC) and local law enforcement agencies; and my training and experience and the experience of other law enforcement officers. This investigation was also assisted by the Arkansas Department of Community Correction, Internal Affairs Division.

3. This Affidavit contains portions of court-authorized intercepted wire conversations. To the extent that intercepted communications are summarized below, those summaries may not include references to all of the topics covered during the course of the conversation that was intercepted. In addition, the summaries may not include references to all statements made by the speakers on the topics that are described. Where conversations are quoted, these are preliminary quotations based on careful review of the recordings, and may be modified upon further review with enhanced listening equipment. Additionally, the identities of speakers in these conversations are based on a combination of several factors, including subscriber information relating to the telephone numbers used and review of intercepted phone calls where callers identify. Additionally, within these conversations, I have added my understanding and/or interpretation of the language

used, which is based on my training and experience and on the experience of other agents in the context of this investigation.

4. The information contained in the Affidavit is provided for the limited purpose of establishing probable cause in connection with the Criminal Complaint charging ROXANNE DAVIS with obstructing, delaying, and affecting in any way and degree "commerce" and the movement of articles and commodities in commerce by "extortion," as those terms are defined in Title 18, United States Code, Section 1951; namely, obtaining money not due defendant or her office, from TORRENCE TURNER and ANTHONY HALL, with TURNER and HALL's consent, under color of official right, namely, by misusing her authority as a state Parole/Probation officer to collect cash payments from drug traffickers under her supervision; in violation of Title 18, United States Code, Section 1951(a). Accordingly, this Affidavit does not include all the information that I have concerning this investigation.

II. Background of Investigation

5. I am one of four FBI case agents for the investigation that has come to be known as "Delta Blues." As part of that investigation, in EDAR Case No. 11CM019, the FBI obtained court-authorization to intercept the calls of DEMETRIUS COLBERT, aka D-COOP, 870-821-1821 (Target Phone 4, or TP4) on April 12, 2011 and again on May 12, 2011. The FBI also obtained court-authorization to intercept the calls of TORRENCE TURNER, aka HOT SHOT, 870-821-0874 (Target Phone 6, or TP6), in EDAR Case No.

11CR26, on May 18, 2011. While I participated in the monitoring and review of all of the Delta Blues wiretaps, I was the case agent for Target Phone 6.

6. On February 8, 2012, a federal grand jury in the Eastern District of Arkansas returned a Superseding Indictment in Case No. 11CR210 charging DEMETRIUS COLBERT with a number of offenses including conspiracy to distribute and to possess with intent to distribute controlled substances including in excess of 5 kilograms of cocaine and in excess of 280 grams of crack cocaine. Similarly, on February 8, 2012 a federal grand jury in the Eastern District of Arkansas returned a Superseding Indictment in Case No. 11CR211 JMM charging TORRENCE TURNER (and TORRENCE DAVIS and ANTHONY HALL, among others), with a number of offenses including conspiracy to distribute and to possess with intent to distribute controlled substances including in excess of 5 kilograms of cocaine and in excess of 280 grams of crack cocaine. The time period of both conspiracies is between in or about January 2010 and October 2011, and COLBERT and TURNER are named but unindicted coconspirators in each other's Superseding Indictments.

7. On July 17, 1995, in Crittenden County Circuit Court Case No. 1994-521, TORRENCE TURNER was convicted of First Degree Murder and received a sentence of 45 years with 7 years suspended. TURNER was placed on parole supervision in 2007. Between March 5, 2007 and October 11, 2011 (when TURNER was arrested in EDAR Case No. 11CR211), TURNER's parole was supervised by Arkansas Department of

Community Correction (ADCC) Officer ROXANNE DAVIS.

8. On October 6, 2010, in Hopkins County Circuit Court, Texas, Case No. 0921356, ANTHONY HALL pleaded guilty to felony possession of cocaine 1-400 grams and was sentenced to ten years probation. Supervision of this probation was transferred to Lee County, Arkansas. On July 12, 2011, in Lee County Circuit Court Case No. 2010-30, HALL pleaded guilty to felony possession of cocaine and was sentenced to five years probation. For both offenses, between October 20, 2010 and October 11, 2011 (when HALL was arrested in EDAR Case No. 11CR211), HALL's probation was supervised by ADCC Officer ROXANNE DAVIS.

III. Unlawful Activities of ADCC Officer ROXANNE DAVIS

A. DAVIS's Job Responsibilities

9. In July 2003, the ADCC offered DAVIS a position as a Probation/Parole Officer. On September 30, 2004, DAVIS was certified by the Arkansas Commission on Law Enforcement Standards as a Certified Law Enforcement Officer with a specialization in Probation/Parole. DAVIS assigned to "Area 9" in eastern Arkansas. As part of her ADCC responsibilities, DAVIS supervises probationers in Lee County.

10. DAVIS's ADCC "Functional Job Description and Tasks" include, among other duties, the following: to maintain a chronological history of contacts with parolees/probationers and prepare reports; and to administer court-ordered and random drug tests to parolees/probationers and write parole violation reports upon a positive test.

DAVIS is required to sign a form acknowledging these duties (and others) each year. Additionally, the ADCC Code of Ethics and Rules of Conduct, which is available to employees on-line, and which ADCC employees must acknowledge by signing a written form each year, states that "parole/probation employees are not authorized to collect economic sanctions" including supervision fees. In fact, ADCC parole/probation offices have signs stating "Stop! Parolees and Probationers: Read This - Do Not pay fees or restitution to ANY DCC Officer or Staff" and provides the correct address for payments.

11. The Code of Ethics and Rules of Conduct also provides that ADCC employees are not permitted to socialize with individuals involved in current criminal behavior, and that "An employee shall not solicit, demand, accept, or agree to accept any personal gift, entertainment, favor, gratuity or preferential treatment that could reasonably be interpreted as influencing the employee's judgment or decisions in the discharge of his or her duties." ADCC Code of Ethics, Paragraph 7.

B. DAVIS's Extortion Under Color of Official Right of TURNER

12. As previously stated, DAVIS supervised TORRENCE TURNER on parole from his First Degree Murder beginning in 2007. On September 17, 2012, TURNER entered into a Plea Agreement¹ in Case No. 11CR211 to conspiracy to distribute and to possess with intent to distribute at least 50 kilograms of cocaine and at least 2.8 kilograms

¹The Plea Agreement is pursuant to Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure, and accordingly the court deferred acceptance of TURNER's plea until a Presentence Investigation Report has been completed.

of crack cocaine. At TURNER's change of plea hearing, TURNER admitted under oath the following facts, pertaining to DAVIS:

Between the time of TURNER's parole and his arrest in 2011, TURNER paid [his] state parole/probation officer "racks and racks," meaning thousands and thousands of dollars in cash, for the state parole/probation officer's personal use. These payments ranged from approximately \$50 to \$800, sometimes represented by the state parole/probation officer to be for expenses such as the officer's "mortgage," "car note," "birthdays," "plane tickets," and "salon trips." In return TURNER, an active drug user, was required to take only one drug test in four years and able to continue with his drug trafficking activities. TURNER, who also had a clothing and shoe store that was opened for shopping only by request, provided the state parole/probation officer with merchandise from that store including shoes for the officer and the officer's family. . . . When visiting TURNER's residence on a couple of occasions, the state parole/probation officer waited down the street from his residence at TURNER's request while TURNER finished drug transactions with his customers. Additionally, the state parole/probation officer alerted TURNER both over the phone and in person about law enforcement interest in his illegal activities during the conspiracy period. Specifically, the state parole/probation officer told TURNER that the FBI had "tapped" into the officer's computer and TURNER should "watch his back."

13. During the time period of the Delta Blues wiretaps, as a part of providing accurate information to the court for those wiretap applications and in preparation for TURNER's arrest, the FBI ran TURNER's criminal history in ACIC on January 31, 2011; February 17, 2011; April 4, 2011; April 6, 2011; and August 12, 2011. I am aware that by running this type of criminal history inquiry, a parolee or probationer's officer is notified which law enforcement agency ran that history. This allows the parole/probation officer to inquire of the agency or the offender about any unlawful activities. DAVIS's ADCC records for TURNER indicate that on the dates above DAVIS was notified that

the FBI ran TURNER's criminal history. The notification appears in DAVIS's Supervision Contact records for TURNER as a "Law Enforcement Inquiry (via ACIC)" by the FBI Little Rock Field Office.

14. Additionally, although TURNER is an active drug user, DAVIS's ADCC records for TORRENCE TURNER indicate that TURNER took four "Random" drug tests on March 21, 2007; April 7, 2009; April 6, 2010; and April 5, 2011, each time testing "Negative" for "Cocaine and THC/Marijuana.

**C. Intercepted Calls Between DAVIS and TURNER,
and Between COLBERT and TURNER**

15. On Tuesday, May 24, 2011, at approximately 1:45 p.m., Call 868 (TP6), TORRENCE TURNER, using Target Phone 6, contacted ROXANNE DAVIS at 870-317-5476, a mobile phone subscribed to by the Department of Community Correction, 105 West Capitol, Little Rock, Arkansas. DAVIS did not answer the phone; instead, DAVIS's voicemail picked up and the outgoing message was as follows: "Hi, this is ROXANNE DAVIS with the Department of Community Co. . . ." [Call ends.]

16. Earlier that same day, at approximately 10:10 a.m., Call 825 (TP6), ROXANNE DAVIS, using 870-317-5476, contacted TORRENCE TURNER at Target Phone 6. The conversation was as follows:

TURNER: Hey, what it do?
DAVIS: Hey, what's up, what's up?
TURNER: I can't call it. What goin on with you.
DAVIS: You come in and get your coupons?
TURNER: Huh?

DAVIS: You come in and get your coupons?
 TURNER: I guess so baby, how you doin, whatcha do with your mo- uh, mother's day- uh, present?
 DAVIS: What did I do with it?
 TURNER: Yeah.
 DAVIS: I think I spent it on the kids.
 TURNER: Hey, did the, did the shoes fit?
 DAVIS: Yeah, uh-huh.
 TURNER: Did he like em?
 DAVIS: Yeah, he like them. He say baby, you got some, uh, all black? I said no, I got what he had now. Leave it alone.
 TURNER: [UI] I like the way that conversation went, how he said that, because I could tell that he is a, uh, appreciative, he . . .
 DAVIS: Yeah . . .
 TURNER: . . . is a appreciative type of brother . . .
 DAVIS: . . .yeah, he appreciated, yeah.
 TURNER: Yeah, I can tell by the conversation how you just, the first words, the first two or three words you say he said, so you know, you know them the type of people you know I indulge with Roc, I love people that, you know, get uh, you put a smile on his face , and uh he happy to get 'em.

DAVIS: Yep.
 TURNER: Ain't didn't hurt his feet or nothin', did it?
 DAVIS: Mmm-nuh. Well, I don't know. He only wear them on when we going out or somewhere.
 TURNER: Well that's all they for. Real shoes, you know, good shoes, you know, real flash, you know, is are the shoes they for when you go out. That's when you put your old ones on when you around the house see.
 DAVIS: Uh-huh. When he go to work, he work so much, he work what, ten to twelve hours a day, so he really don't get to go nowhere and then on Saturday he do overtime, so on Sunday he usually laid up in bed resting up for Monday, so.
 TURNER: Yeah. Where you at?
 DAVIS: I'm up here, at the courthouse.
 TURNER: How long you gonna be up there?
 DAVIS: I'll be here 'til twelve, umm uh, the oldest's birthday Thursday.
 TURNER: Who, who, who birthday? Who b-day?

DAVIS: [Name of minor child].²

TURNER: Okay, okay, okay.

I understand this conversation to mean that TURNER gave DAVIS money as a “mother’s day present” and is asking how she spent the money. TURNER further asks if DAVIS’s male relative liked the shoes he gave her for the male relative.

17. Approximately three hours later, at 1:11 p.m., Call 857 (TP6), ROXANNE DAVIS, using 870-317-5476, contacted Torrence Turner at Target Phone 6. The conversation was as follows:

DAVIS: Hello.

TURNER: Don’t forget to tell [minor child] happy birthday for me

DAVIS: I sure won’t, I sure won’t.

TURNER: I know, I know you gonna tell [minor child]. What you gonna buy?

DAVIS: I don’t know, I’m in Fashion Connection now looking for me something.

TURNER: Ah, oh oh oh okay, okay, okay, well you know, you are (minor child’s) mother, you know, if you need some more you know you take that one-seventy and get you know, just take care of the baby [minor child] for me, that’s all I care about.

DAVIS: Ah, okay.

TURNER: You got that for me baby?

DAVIS: Yeah, I got it, did you say if I needed more?

TURNER: Tell [minor child] I say happy, tell [minor child] I say happy, huh?

DAVIS: Did you say if I needed some more? Is that what you said? Is that . . .

TURNER: Say what now?

DAVIS: . . . what come out of your mouth?

²DAVIS’s ADCC personnel records indicate that she has a minor child with the stated name and a birthdate of May 26. The child’s age, as stated by DAVIS over the phone, matches the year of birth in the personnel file.

TURNER: I couldn't hear you, what you say?
 DAVIS: Did you say if I needed some more?
 TURNER: Yeah.
 DAVIS: Is that what you said? Oh.
 TURNER: No, I said if you need, if you, if you need, if you need some more, just get fifty of [minor child's] and just give [minor child] fifty and then tell [minor child] it's from me for [minor child's] birthday . . .
 DAVIS: Oh, all right.
 TURNER: . . . and let [minor child] spend her own money.
 DAVIS: Oh, that, that, that's how it's gonna be.
 TURNER: Fifty dollars a lot for a little [minor child]. How old [minor child] is?
 DAVIS: I swear. [Age of minor chld] year old.
 TURNER: Well, fifty dollars. [Minor child] got a hundred, but give [minor child] fifty. And you keep, put fifty on your clothes, baby.
 DAVIS: Oh, okay.
 TURNER: I mean, you know, it is what it is, 'cause you won't feel discouraged about it cause I told you get it, for a [age of minor child] year old fifty dollars is a lot.
 DAVIS: It sure is.
 TURNER: Nigga ain't walkin around here with five dollars in their pocket.
 DAVIS: [Minor child] been walking around with uh, this twenty for the longest, for a week now.
 TURNER: Yeah. Well, enjoy yourself. When [minor child's] birthday is?
 DAVIS: Thursday.
 TURNER: Ah, a'ight. Tell [minor child] I say happy birthday.
 DAVIS: I sure will.
 TURNER: All right baby.
 DAVIS: All right.
 TURNER: Bye.

I understand this conversation to mean that TURNER has seen DAVIS in the past three hours, and TURNER gave DAVIS \$170, \$100 of which was for DAVIS's child's birthday. DAVIS wants more money, and TURNER tells her to spend \$50 of the intended birthday money on herself, giving the other \$50 to the child.

18. Approximately twenty minutes after that call, at 1:34 p.m., Call 867 (TP6),

ROXANNE DAVIS, using 870-317-5476, contacted Torrence Turner at Target Phone 6.

The conversation was as follows:

TURNER: Yo, what's going on?
DAVIS: Squeaky got a car up here that I want, I need it.
TURNER: You got a what?
DAVIS: A car.
TURNER: He got a car?
DAVIS: Yup. '95 altima.
TURNER: What he want for it?
DAVIS: He want, if it's cash he want 15, but if I, if he got, if he got to take on, he gotta work with it, it be 18.
TURNER: Man, you know, you know, half of them cars, Squeaky be selling up there that motherfucker break down in a week on you, baby.
DAVIS: No, I didn't know.
TURNER: Yeah, now you know.
DAVIS: I just call cause I need a small car.
TURNER: Well, check it, check it out. Put it on the computer, then you'll know what's going on. Not his computer, take it to the white folks computer.
DAVIS: You gonna get it?
TURNER: We'll see what it do, in due time but right now you know my mom back in the hospital, let me situate her, and then woopy-woopy-woo.
DAVIS: Well he probably, he gonna take it to the sale tonight, see if he can sell it then.
TURNER: All that man, all, look man look in due time it ain't nothin to find that, that's easy to find.
DAVIS: Oh, okay.
TURNER: But yeah, we'll, we'll put in the making.
DAVIS: All right.
TURNER: All right.
DAVIS: Bye.

I understand this conversation to mean that DAVIS wants TURNER to buy her a car for \$1500, and TURNER tells her that car is not worth it and he will look elsewhere for a car for her.

19. Less than three weeks later, on Thursday, June 9, 2011, at approximately 11:28 a.m., Call 3026 (TP6), Torrence Turner, using Target Phone 6, contacted ROXANNE DAVIS at 870-317-5476. The conversation was as follows:

DAVIS: Hello?
TURNER: Hey baby.
DAVIS: Hey.
TURNER: Whatcha doin?
DAVIS: Working.
TURNER: You say what now?
DAVIS: Working with . . .
TURNER: Chillin, chillin, whatcha up to.
DAVIS: Nothin', I'm down here working. Seeing clients.
TURNER: Are you down my way?
DAVIS: Mmm-hmm.
TURNER: Got on that sexy skirt for me?
DAVIS: Nuh-huh.
* * * *
TURNER: You a'ight? You need anything?
DAVIS: Yep.
TURNER: Then what you doin' after this? What you doin' up there? Who all up there? Lotta people up there?
DAVIS: No.
TURNER: Well can, can I see you today?
DAVIS: Not like that.
TURNER: Still, still though, lemme come and see you still, throw you something. How long you gonna be up there?
DAVIS: For a few more minutes. You can come on up here now.
TURNER: Okay, give me a minute.
DAVIS: All right.
TURNER: All right.

20. Approximately forty-five minutes later, it appears that TURNER and DAVIS have met. On Thursday, June 9, 2011, at approximately 12:15 p.m., Call 3037 (TP6), Torrence Turner, using Target Phone 6, contacted ROXANNE DAVIS at 870-

317-5476. The conversation was as follows:

DAVIS: Hello.
TURNER: Drive safe now. Where you headed?
DAVIS: Oh, okay.
TURNER: Where you headed?
DAVIS: Back home.
TURNER: When, when I'll see you again?
DAVIS: Uh, I'll be back down here Tuesday.
TURNER: A'ight. Let me see that pretty little dress.
DAVIS: I'll see what I can do.
TURNER: Have it [deleted] now.
DAVIS: Shut up.
TURNER: Aight then baby.
DAVIS: Bye.
TURNER: Bye.

21. Prior to these calls between TURNER and DAVIS, and prior to the wiretap of TURNER's phone, law enforcement agents intercepted a call between TURNER and DEMETRIUS COLBERT concerning DAVIS. This conversation, on Thursday, April 14, 2011, at approximately 3:03 p.m., Call 134 (TP4), between Demetrius Colbert, using 870-821-1821 (TP4), and TORRENCE TURNER at Target Phone 6, occurred approximately a week after the FBI ran TURNER's criminal history, alerting DAVIS.

The relevant portion of that conversation was as follows:

TURNER: What's up with you boy?
COLBERT: What it do, what it do. I said I got to hit you, check on you, hell.
TURNER: Oh, man. Chillin' man, chillin' man. God damn, my P.O. told me to jack my slacks for a week or two.
COLBERT: Okay, okay.
TURNER: Yeah, so I just been doin' a little, I just been workin' what I had, since real real slow on the night shift. I said damn, I had told Unc, I said, I know Wo' will hold it for me, though. I said god damn, if not he'll be back, I wasn't tripping though, but I just been taking the night shift, and

uh, taking heed to what she told me.
COLBERT: Okay, okay, that's ball, that's ball, hell man.
TURNER: Yeah, that was my, my P.O. come personally, she come over to the
doorstep.
COLBERT: Okay, that's, I'm fixin' to say, which one you got?
TURNER: I got ROXANNE.
COLBERT: Yeah, she straight ain't she?
TURNER: Yeah, yeah, but still though, you know, I do respect her, I respect her
'cause whenever I need a favor, and I would call on her if I need one,
I know she'll be beside 100%.
COLBERT: Yeah, that's right, she pretty cool.

I understand this to mean that TURNER is telling COLBERT that he has to tone down his drug activities after a warning from his Parole Officer about a potential investigation, and COLBERT is surprised because DAVIS is known to be "straight," in this context, meaning that she does not enforce the parole requirements against the drug traffickers. COLBERT and TURNER then discuss that their supply of drugs is low, and COLBERT expects a delivery in the near future.

D. DAVIS's Extortionate and Unlawful Conduct As Witnessed by TORRENCE DAVIS

22. On September 17, 2012, TORRENCE DAVIS entered into a Plea Agreement in Case No. 11CR211 to conspiracy to distribute and to possess with intent to distribute at least 500 grams of cocaine. At TORRENCE DAVIS's change of plea hearing, TORRENCE DAVIS admitted under oath the following facts, pertaining to ROXANNE DAVIS:

In 2011, TORRENCE DAVIS assisted his father, TORRENCE TURNER, with the distribution of cocaine and crack cocaine from his father's residence in Marianna, Arkansas. . . . During the time DAVIS assisted Turner with the

distribution of cocaine, DAVIS was aware that Turner was on parole and supervised by a state probation officer. DAVIS was with Turner when Turner paid the state probation officer cash for "fines." DAVIS was also present when the state probation officer bought clothes and received free shoes from Turner. Turner told DAVIS that by providing these things to the state probation officer, the state probation officer would leave him alone to "hustle", meaning deal drugs. On one occasion in summer 2011, the state probation officer came to Turner's residence while DAVIS was present. DAVIS heard the state probation officer tell Turner that the "feds" had looked up Turner's name and Turner should not contact her again.

E. DAVIS's Extortion Under Color of Official Right of HALL

23. On September 17, 2012, ANTHONY HALL entered into a Plea Agreement in Case No. 11CR211 to conspiracy to distribute and to possess with intent to distribute at least 500 grams of cocaine. At HALL's change of plea hearing, HALL admitted under oath the following facts pertaining to DAVIS:

HALL paid [his] probation officer money so he could continue selling drugs without the state probation officer's interference. Typically, HALL visited the state probation officer once a month, either alone or with a group of probationers from the Marianna area. When the group visited the state probation officer, they would pool their money together and give the state probation officer between \$100-150 per visit. If HALL went alone, he would give the state probation officer \$20-30 per visit. HALL knew this money was not part of his probation fees. The average amount of money HALL gave Davis per visit was \$75, with \$25 going to Texas probation fees, \$25 going to Arkansas probation fees, and \$25 going to DAVIS personally. If Hall didn't have enough cash to pay his fees he would still give DAVIS a few dollars.

[CONTINUED ON NEXT PAGE]

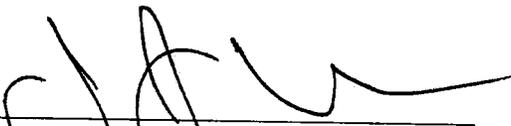
ADCC records confirm that DAVIS supervised ANTHONY HALL, who was on probation for drug convictions in Texas and Arkansas, in 2010 and 2011.

FURTHER AFFIANT SAYETH NOT.



JOHN C. MARSH
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN TO before me this
17th day of September, 2012.



JOSEPH J. VOLPE
United States Magistrate Judge