

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DOMINGO BLOUNT (a/k/a Mingo, John White,
David Roose) and Defendants named
in the attached list

CRIMINAL COMPLAINT I
CASE NUMBER:

UNDER SEAL

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

Count One: Beginning no later than in or about March 2010, and continuing until the present, DOMINGO BLOUNT (a/k/a Mingo, John White, David Roose), GABRIEL BRIDGES (a/k/a Gabe Bridges), CHARLES THOMAS (a/k/a Big C, Willie Thomas, Walter Davis, Charles Thomas, Jr., Thomas Brown, Bob Goodfella, Bobby Jones, Samuel Cole, Deon Davis, Charles Williams, Charles Bullock), RICHARD HOPKINS (a/k/a "Rich"), MYRON GRISBY (a/k/a Myron K. Grigsby, Jr., Zane), LAMAR BLOUNT (a/k/a Lamont Blunt, Tyrone Blount, Blount), DEMETRIUS COLE (a/k/a Meechie) and OMESHIA CRUSOE (a/k/a "O") conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, 500 grams or more of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

Count Two: Beginning no later than 2010, and continuing until the present, ARTURO FLORES (a/k/a Cerillo, Jose Arturo Flores), FERNANDO ACEVEDO-MARCHAN, RUBEN GARCIA (a/k/a Ruben Garcia III), RANULFO SOBERANIS-CAMPOS (a/k/a Ranulfo Campos, Ranulfo Soberanis, Pancho, Cebollo), JOSE HERRERA (a/k/a Juan Berrera, Luis Herrera, Hector Vizcarra) and GERARDO HERNANDEZ (a/k/a Chaparrito, Chaparro), conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, and 500 grams or more of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

Count Three: Beginning no later than on or about May 10, 2011, and continuing until on or about May 16, 2011, TIMOTEO TORRES-TELLEZ and BERNARDO TELLEZ conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), in violation of Title 21, United States Code, Section 846.

Count Four: Beginning no later than on or about March 22, 2010, ARTURO FLORES (a/k/a Cerillo, Jose Arturo Flores) and ALSHAWNTUS BECK conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), in violation of Title 21, United States Code, Section 846.

Count Five: On or about November 1, 2010, ANGEL HERNANDEZ (a/k/a Angel Hernandez-Marchan) did knowingly and intentionally distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Six: On or about January 15, 2011, ANGEL HERNANDEZ (a/k/a Angel Hernandez-Marchan) did knowingly and intentionally distribute a controlled substance, namely 500 grams or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Seven: On or about January 28, 2011, ARMANDO FERNANDEZ (a/k/a "Puppet") did knowingly and intentionally distribute a controlled substance, namely at least 100 grams or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Eight: On or about May 14, 2011, ALSHAWNTUS BECK did knowingly and intentionally possess with intent to distribute a controlled substance, namely, at least 100 grams or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

I further state that I am a Special Agent of the Drug Enforcement Administration and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet and made a part hereof: Yes No

Timothy L. Lessner, Special Agent
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

June , 2011 _____
Date

at

Chicago, Illinois _____
City and State

Name & Title of Judicial Officer

, U.S. Magistrate Judge

Signature of Judicial Officer

Complaint I Attachment:
Continued List of Defendants

2. GABRIEL BRIDGES (a/k/a Gabe Bridges)
3. CHARLES THOMAS (a/k/a Big C, Willie Thomas, Walter Davis, Charles Thomas, Jr., Thomas Brown, Bob Goodfella, Bobby Jones, Samuel Cole, Deon Davis, Charles Williams, Charles Bullock)
4. RICHARD HOPKINS (a/k/a Rich)
5. MYRON GRISBY (a/k/a Myron K. Grigsby, Jr., Zane)
6. LAMAR BLOUNT (a/k/a Lamont Blunt, Tyrone Blount, Blount)
7. DEMETRIUS COLE (a/k/a Meechie)
8. OMEISHA CRUSOE (a/k/a "O")
9. ARTURO FLORES (a/k/a Cerillo, Jose Arturo Flores)
10. FERNANDO ACEVEDO-MARCHAN (a/k/a Fernando Acevedo)
11. JOSE HERRERA (a/k/a Juan Berrera, Luis Herrera, Hector Vizcarra)
12. RUBIN GARCIA (a/k/a Ruben Garcia III)
13. RANULFO SOBERANIS-CAMPOS (a/k/a Ranulfo Campos, Ranulfo Soberanis, Pancho, Cebollo)
14. GERARDO HERNANDEZ (a/k/a Chaparrito, Chaparro)
15. TIMOTEO TORRES-TELLEZ
16. BERNARDO TELLEZ
17. ANGEL HERNANDEZ (a/k/a Angel Hernandez-Marchan)
18. ALSHAWNTUS BECK
19. ARMANDO FERNANDEZ (a/k/a Puppet)

conversations; (f) physical surveillance conducted by law enforcement agents and officers, which I have either participated in or has been reported to me either directly or indirectly; (g) my review and analyses of telephone toll records, pen register and trap and trace data and cell site information; (h) my review of information derived from law enforcement and commercial database records; (i) my review of information derived from criminal history records maintained by the Chicago Police Department (“CPD”), Illinois State Police and National Crime Information Center (“NCIC”); (j) my review of drivers' license and automobile registration records from various states, including records of the Illinois Secretary of State (“SOS”); (k) my review of information provided by cooperating sources, witnesses and other individuals; and (l) laboratory analysis reports.

3. This Affidavit is made in support of a Criminal Complaint charging the following offenses:

a. Beginning no later than in or about March 2010, and continuing until the present, DOMINGO BLOUNT (a/k/a Mingo, John White, David Roose), GABRIEL BRIDGES (a/k/a Gabe Bridges), CHARLES THOMAS (a/k/a Big C, Willie Thomas, Walter Davis, Charles Thomas, Jr., Thomas Brown, Bob Goodfella, Bobby Jones, Samuel Cole, Deon Davis, Charles Williams, Charles Bullock), RICHARD HOPKINS (a/k/a Rich), MYRON GRISBY (a/k/a Myron K. Grigsby, Jr., Zane), LAMAR BLOUNT (a/k/a Lamont Blunt, Tyrone Blount, Blount), DEMETRIUS COLE (a/k/a Meechie) and OMESHIA CRUSOE (a/k/a “O”) conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, and 500 grams or more of mixtures and substances containing a detectable amount of

cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

b. Beginning no later than 2010, and continuing until the present, ARTURO FLORES (a/k/a Cerillo, Jose Arturo Flores), FERNANDO ACEVEDO-MARCHAN, JOSE HERRERA (a/k/a Juan Berrera, Luis Herrera, Hector Vizcarra) RUBEN GARCIA (a/k/a Ruben Garcia III), RANULFO SOBERANIS-CAMPOS (a/k/a Ranulfo Campos, Ranulfo Soberanis, Pancho, Cebollo), and GERARDO HERNANDEZ (a/k/a Chaparrito, Chaparro), conspired with each other, and with others known and unknown, including Luis Gambino, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, and 500 grams or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

c. Beginning no later than on or about May 10, 2011, and continuing until on or about May 16, 2011, TIMOTEO TORRES-TELLEZ and BERNARDO TELLEZ conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), in violation of Title 21, United States Code, Section 846.

d. Beginning no later than on or about March 22, 2011, ALSHAWNTUS BECK and ARTURO FLORES conspired with each other, and with others known and unknown, to

knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

e. At various times in 2010 and 2011, certain defendants distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), specifically:

(i) On or about November 1, 2010, ANGEL HERNANDEZ (a/k/a Angel Hernandez-Marchan) did knowingly and intentionally distribute a controlled substance, namely 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

(ii) On or about November 1, 2010, ANGEL HERNANDEZ (a/k/a Angel Hernandez-Marchan) did knowingly and intentionally distribute a controlled substance, namely 500 grams or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

(iii) On or about January 28, 2011, ARMANDO FERNANDEZ (a/k/a Puppet) did knowingly and intentionally distribute a controlled substance, namely at least 100 grams or more of mixtures containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

(iv) On or about May 14, 2011, ALSHAWNTUS BECK did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 100 grams or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. This Affidavit is also made for the purpose of establishing probable cause in support of warrants to search the locations listed below, which are further described in ¶¶375-395 below and in the Attachment A for each requested search warrant), and to seize evidence relating to the commission of the violations of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 846, as further described in Attachment B for each requested search warrant:

a. 7922 South Carpenter Street, Chicago, Illinois (hereinafter “**the 7922 South Carpenter Residence**”);

b. 1920 North Karlov Avenue, Chicago, Illinois (hereinafter “**the 1920 North Karlov Residence**”);

c. 4910 West Medill Avenue, Chicago, Illinois (hereinafter “**the 4910 West Medill Residence**”);

d. 2615 East 73rd Street, Chicago, Illinois (hereinafter “**the 2615 East 73rd Street Residence**”).

5. This Affidavit is also made for the purpose of establishing probable cause in support of warrants to seize the vehicles described below in ¶396, and in the Attachment A for each requested seizure warrant (“SUBJECT VEHICLES”).

6. The recitation of facts contained in this Affidavit is not meant to be a complete narrative of all that has occurred in connection with this investigation, but is only a summary of facts

necessary to establish probable cause in support of the requested criminal complaint, search warrants and seizure warrants. Therefore, this affidavit contains only a summary of relevant facts, and I have not included each and every fact known to me concerning the individuals, events and matters described herein.

II. BACKGROUND OF THE INVESTIGATION

7. Since approximately March of 2010, DEA and CPD have been conducting a joint investigation into DOMINGO BLOUNT's and GABRIEL BRIDGES' Drug Trafficking Organization (hereinafter, "BLOUNT-BRIDGES DTO"). Through this investigation, which has included heroin purchases by a CPD undercover officer (hereinafter the "UC") from DOMINGO BLOUNT, court-authorized wire interceptions, extensive surveillance and seizures of narcotics and drug proceeds, law enforcement officers have learned that the defendants, and others, are involved in the distribution of multi-kilogram quantities of heroin in Chicago, Illinois; Cincinnati, Ohio; New York, New York; and elsewhere.

8. From in and around March 2010, through in and around June 2010, the UC completed five undercover purchases of heroin, totaling more than 124 grams, from DOMINGO BLOUNT (which are described below in ¶¶21-45). Surveillance during these undercover purchases identified other individuals assisting DOMINGO BLOUNT, plus residences and vehicles used in the course of the violations.

9. At various times between July 2010 and the present, pursuant to court orders issued by the United States District Court for the Northern District of Illinois, conversations over the following cellular phones were intercepted:¹

Phone Number	Target Phone	User
(773) 678-4933	1	Domingo BLOUNT
(773) 430-1939	2	Luis GAMBINO
(513) 254-3646	3	Domingo BLOUNT
(773) 678-1341	4	Fernando ACEVEDO-MARCHAN
(773) 299-4737	5	Arturo FLORES
(773) 655-2599	6	Fernando ACEVEDO-MARCHAN
(773) 619-9310	7	Arturo FLORES
(773) 798-3025	8	Angel HERNANDEZ
(773) 565-5450	9	Arturo FLORES
(773) 596-4629	10	Angel HERNANDEZ
(773) 367-2493	11	Gerardo HERNANDEZ
(773) 367-1211	12	Arturo FLORES

¹The call summaries in this Affidavit that include a call or session number refer to telephone calls that were intercepted pursuant to one of the above-referenced court orders. At various points in the Affidavit, I will offer my interpretations in brackets and otherwise, of certain intercepted conversations, and also of consensually recorded conversations. My interpretations of these conversations are based on my and other officers' knowledge of the investigation to date, a review of the contents and context of the conversations, prior and subsequent conversations, the results of physical surveillance, conversations with other officers and agents and my and other officers' experience and familiarity with narcotics trafficking organizations generally. Some of these summaries do not include references to all topics covered during the course of the conversations. In addition, the summaries do not necessarily include references to all statements made by the speakers on the topics that are mentioned. For some of these recordings which occurred in the Spanish language, I have at times relied on draft – not final – English translations of conversations in Spanish done by DEA agents and/or interpreters contracted by DEA. For others, I have relied on draft – not final – transcripts of conversations done by DEA agents and members of CPD. Italicized words appearing in summaries of Spanish conversations were spoken in English. All listed times are approximate.

(773) 302-7425	13	Arturo FLORES
(773) 798-3400	14	Angel HERNANDEZ
(773) 220-2185	15	Fernando ACEVEDO-MARCHAN
(773) 565-5024	16	Arturo FLORES

10. Law enforcement also has made a number of seizures of narcotics and United States currency during this investigation. Specifically:

Date of Seizure	Seizure
July 23, 2010	428 grams of heroin
October 8, 2010	496 grams of heroin
November 10, 2010	1,849.6 grams of cocaine
December 3, 2010	1,005 grams of heroin
February 14, 2011	3,540 grams of heroin
February 18, 2011	497.5 grams of cocaine
May 16, 2011	9,774 grams of heroin
September 29, 2010	\$122,120
February 12, 2011	\$144,500

11. This Affidavit is organized as follows: (a) Section III sets forth an overview of the conspiracies underlying this complaint, along with a brief description of each defendant's role(s) in the conspiracies and individual counts charged; (b) Section IV sets forth citations to the particular paragraphs within this Affidavit that discuss the evidence against each particular defendant; (c) Section V sets forth specific evidence in the investigation as it relates to each defendant both for the conspiracies charged and for the individual counts charged; (d) Section VI describes probable cause for the requested search warrants, as well as the evidence supporting no-knock authority to execute

the search warrant at **the 2615 East 73rd Street Residence**; (e) Section VII describes the probable cause for seizing the SUBJECT VEHICLES; and (f) Section VIII describes the evidence supporting no-knock authority to execute the arrest warrants of DOMINGO BLOUNT and ARMANDO FERNANDEZ.

III. OVERVIEW OF THE CONSPIRACIES AND EACH DEFENDANT'S ROLE(S)

BLOUNT-BRIDGES DTO

12. The investigation has determined that since at least 2010, and continuing through the present, the BLOUNT-BRIDGES DTO, run by DOMINGO BLOUNT and GABRIEL BRIDGES, has been responsible for the distribution of multi-kilograms of heroin in the Chicago, Illinois area, Cincinnati, Ohio area, and elsewhere. The individuals involved in the BLOUNT-BRIDGES DTO are as follows:

a. DOMINGO BLOUNT (hereinafter, "BLOUNT") oversees the BLOUNT-BRIDGES DTO, obtaining narcotics for distribution, and distributing multi-kilogram quantities of heroin in Chicago, Illinois, Cincinnati, Ohio and elsewhere. Among other things, BLOUNT negotiates narcotics transactions with suppliers and customers, picks up narcotics from suppliers and/or suppliers' brokers, delivers narcotics to customers, provides payment for narcotics on behalf of the BLOUNT-BRIDGES DTO, and also keeps money on behalf of the DTO.

b. GABRIEL BRIDGES (hereinafter, "BRIDGES") is a partner of BLOUNT in distributing narcotics, and BRIDGES conducts narcotics transactions on behalf of the DTO. BRIDGES frequently picks up the narcotics from the source of supply and/or the supplier's broker and transports it for safekeeping to his own residence or to a stash house located on the same block as his residence. BRIDGES also has acted as security during narcotics transactions in which

BLOUNT picks up the heroin from the source of supply and/or the supplier's broker, meaning that BRIDGES rides in a separate car but in tandem with BLOUNT during narcotics transactions, in order to ensure the security of BLOUNT, the heroin and the money to pay for the narcotics, and also to help detect and evade law enforcement during narcotics transactions. BRIDGES also, on behalf of the DTO, negotiates narcotics deals with suppliers and customers, delivers narcotics to customers, and handles payment for the narcotics.

c. CHARLES THOMAS (hereinafter, "CHARLES THOMAS") provides security for the BLOUNT-BRIDGES DTO during narcotics transactions.

d. RICHARD HOPKINS (hereinafter, "HOPKINS") provides security for BLOUNT-BRIDGES DTO during narcotics transactions, riding with or in tandem with BLOUNT and/or BRIDGES during narcotics transactions. HOPKINS also has acted as a courier, picking up heroin from a supplier on behalf of the BLOUNT-BRIDGES DTO.

e. MYRON GRISBY (hereinafter, "GRISBY") distributes heroin for the BLOUNT-BRIDGES DTO in Cincinnati, Ohio. GRISBY also arranges for the BLOUNT-BRIDGES DTO to have access to automobiles which are not registered to members of the BLOUNT-BRIDGES DTO, for the purpose of avoiding detection by law enforcement, and which contain hidden compartments for the purpose of transporting narcotics.

f. LAMAR BLOUNT ("LAMAR BLOUNT") assists DOMINGO BLOUNT in distributing narcotics by delivering narcotics to customers.

g. DEMETRIUS COLE ("COLE") assists BLOUNT in distributing narcotics by delivering narcotics to customers.

h. OMESHIA CRUSOE (hereinafter, “CRUSOE”) is a courier for the BLOUNT-BRIDGES DTO, who delivers large quantities of heroin to customers of the DTO, specifically delivering heroin from Chicago to customers in the Cincinnati, Ohio, area.

FLORES DTO

13. The investigation has determined that, since at least 2010, and continuing through the present, the FLORES Drug Trafficking Organization (“FLORES DTO”), run by ARTURO FLORES , has been responsible for the distribution of multi-kilograms of heroin, and large quantities of cocaine in Chicago, Illinois, New York, New York, and elsewhere. The FLORES DTO distributes heroin and cocaine to the BLOUNT-BRIDGES DTO and to others. The individuals involved in the FLORES DTO are as follows:

a. ARTURO FLORES (hereinafter, “FLORES”) obtains heroin through suppliers in Mexico and elsewhere. FLORES then uses brokers, primarily ACEVEDO-MARCHAN, to broker the sale of large quantities of heroin to customers in the Chicago, Illinois area. FLORES also uses couriers to deliver large quantities of heroin to other areas, namely, New York, New York, and elsewhere. FLORES also has obtained cocaine through ANGEL HERNANDEZ, GERARDO HERNANDEZ, TIMOTEO TORRES-TELLEZ and others, which he then distributes to customers.

b. FERNANDO ACEVEDO-MARCHAN (hereinafter, “ACEVEDO-MARCHAN”) is a broker who arranges for FLORES to distribute large quantities of heroin and cocaine to various customers in the Chicago, Illinois area, including the BLOUNT-BRIDGES DTO. ACEVEDO-MARCHAN negotiates the quantity and price directly with the customer, and relays information between the customer and FLORES. ACEVEDO-MARCHAN also meets with the customer prior to FLORES’ delivery of the narcotics, to ensure that the customer has the money to

pay for the narcotics. On some occasions, FLORES delivers the heroin to ACEVEDO-MARCHAN, and ACEVEDO-MARCHAN, delivers the narcotics to the customer and obtains the money payment for the heroin from the customer. On other occasions, ACEVEDO-MARCHAN meets FLORES at the place of delivery of the narcotics to the customer, and both the delivery of the narcotics and the payment of money between ACEVEDO-MARCHAN and FLORES are handled together. Generally, FLORES provides a fee to ACEVEDO-MARCHAN for brokering these narcotics deals.

c. Luis Gambino (hereinafter, "Gambino") acts as a broker for the FLORES DTO, arranging with ACEVEDO-MARCHAN for the FLORES DTO to distribute heroin to the BLOUNT-BRIDGES DTO. Gambino negotiates the quantity and price directly with customers, and then arranges for the customer to pick up the heroin directly from FLORES. Generally, Gambino receives a fee from FLORES or ACEVEDO-MARCHAN for arranging these narcotics deals.²

d. JOSE HERRERA (hereinafter, "HERRERA") assists FLORES in the distribution of narcotics. HERRERA also acts as a courier for the FLORES DTO, delivering large quantities of heroin on behalf of the DTO to customers of the DTO in New York and elsewhere.

e. RUBEN GARCIA (a/k/a Ruben Garcia III) (hereinafter "GARCIA") is a courier who has delivered heroin fronted by a Mexican source to the FLORES DTO, for distribution in Chicago, Illinois and elsewhere.

²Gambino is charged with narcotics violations in a separate federal criminal complaint filed on the same day as this complaint. Gambino also is charged with illegal reentry in a separate federal criminal complaint, Case No. 11 CR 200.

f. RANULFO SOBERANIS-CAMPOS (hereinafter, “SOBERANIS-CAMPOS”) is a courier who has picked up money as payment for heroin fronted by the Mexican source of supply to the FLORES DTO. This money was then intended to be transmitted on behalf of the FLORES DTO back to the Mexican source of supply of heroin.

14. The FLORES DTO has purchased narcotics from several sources, often through “fronting,” meaning that these sources provide the narcotics to FLORES pursuant to an arrangement in which FLORES did not have to pay for cocaine until FLORES obtained the money for distributing the cocaine. These sources include:

a. GERARDO HERNANDEZ (hereinafter “GERARDO HERNANDEZ”) is a distributor of narcotics who has fronted heroin to FLORES for distribution; and

b. TIMOTEO TORRES-TELLEZ (hereinafter “TORRES-TELLEZ”), with the assistance of BERNARDO TELLEZ (hereinafter “TELLEZ”), and others, has fronted heroin to FLORES for distribution.

15. The FLORES DTO distributes narcotics to a number of customers, including the BLOUNT-BRIDGES DTO.

ANGEL HERNANDEZ DTO

16. The investigation has determined that, since at least 2010, and continuing through the present, the ANGEL HERNANDEZ Drug Trafficking Organization (“ANGEL HERNANDEZ DTO”), run by ANGEL HERNANDEZ (hereinafter “ANGEL HERNANDEZ”), has been responsible for the distribution of large quantities of heroin and cocaine in the Chicago, Illinois area. The ANGEL HERNANDEZ DTO has distributed primarily to the BLOUNT-BRIDGES DTO, through BRIDGES. The individuals involved in the ANGEL HERNANDEZ DTO are as follows:

a. ANGEL HERNANDEZ is a distributor of narcotics who distributes narcotics in the Chicago, Illinois area, using ACEVEDO-MARCHAN to broker distribution quantities of heroin and cocaine to Chicago area customers.

b. ACEVEDO-MARCHAN acts as a broker who arranges for ANGEL HERNANDEZ to distribute large quantities of heroin and cocaine to customers in the Chicago, Illinois area, specifically the BLOUNT-BRIDGES DTO. ACEVEDO-MARCHAN negotiates the quantity and price directly with the customer, and relays information between the customer and ANGEL HERNANDEZ. ACEVEDO-MARCHAN also facilitates both delivery of the narcotics to the customer and payment for the narcotics to ANGEL HERNANDEZ.

ARMANDO FERNANDEZ

17. ARMANDO FERNANDEZ (a/k/a “Puppet”) (hereinafter “FERNANDEZ”) is a supplier of narcotics who purchases distribution quantities of narcotics from FLORES to distribute in the Chicago, Illinois area.

ALSHAWNTUS BECK

18. ALSHAWNTUS BECK (hereinafter, “BECK”), is a supplier of narcotics who purchases distribution quantities of narcotics from FLORES, sometimes on credit, to distribute in the Chicago, Illinois area.

IV. SUMMARY INDEX OF THE EVIDENCE AGAINST EACH DEFENDANT

19. The following is an alphabetical list of those individuals charged in the criminal complaint and the specific paragraphs of this Affidavit relating to those individuals:

Defendant	Paragraphs
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FERNANDO ACEVEDO-MARCHAN	46-60, 80-185, 239-258, 307-345
ALSHAWNTUS BECK	346-374
DOMINGO BLOUNT	21-345, 239-277
LAMAR BLOUNT	30-35
GABRIEL BRIDGES	46-345, 239-277
DEMETRIUS COLE	36-39
OMESHIA CRUSOE	61-79
ARMANDO FERNANDEZ	335-345
ARTURO FLORES	46-60, 80-185, 206-218, 259-306, 346-361
RUBEN GARCIA	206-218
MYRON GRISBY	61-79
ANGEL HERNANDEZ	307-334
GERARDO HERNANDEZ	259-277
JOSE HERRERA	231-238
RICHARD HOPKINS	187-202
RANULFO SOBERANIS-CAMPOS	219-230
CHARLES THOMAS	103-127, 139-153, 307-316
BERNARDO TELLEZ	278-306
TIMOTEO TORRES-TELLEZ	278-306

20. The following is a list of larger quantity narcotics distributions and seizures charged in the criminal complaint and the specific paragraphs of this Affidavit relating to those transactions:

HEROIN DEALS	
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Date	Quantity	From	To	Paragraph Nos.
March-June 2010	124 grams	Blount	UC	¶¶21-45
7/15/2010	1 kilo	Flores/Acevedo-Marchan/Gambino	Blount-Bridges	¶¶46-60
7/24/2010	428.4 grams*	Blount-Bridges	Grisby	¶¶61-79
10/3/2010	600 grams	Flores/Acevedo-Marchan/Gambino	Blount-Bridges	¶¶80-102
10/8/2010	496 grams*	Blount-Bridges	Individuals F & G	n.16
10/20/2010	800 grams	Flores/Acevedo-Marchan	Blount-Bridges	¶¶103-110
10/25/2010	1 kilo	Flores/Acevedo-Marchan	Blount-Bridges	¶¶111-127
11/1/2010	1 kilo	A. Hernandez/Acevedo-Marchan	Blount-Bridges	¶¶307-317
11/3/2010	500 grams	Flores/Acevedo-Marchan	Blount-Bridges	¶¶128-138
11/6/2010	1 kilo	Flores/Acevedo-Marchan	Blount-Bridges	¶¶139-155
11/24/2010	1 kilo	Flores/Acevedo-Marchan	Blount-Bridges	¶¶156-167
12/17/2010	500 grams	Flores/Acevedo-Marchan	Blount-Bridges	¶¶168-185
1/28/2011	100 grams	Fernandez/Acevedo-Marchan	Blount-Bridges	¶¶335-345
2/9/2011	3,540 grams*	Mexico	Flores/NY	¶¶206-218
3/22/2011	1 kilo	Flores	Beck	¶¶346-361
3/27/2011	1 kilo	G. Fernandez/ Flores/Acevedo-Marchan	Blount-Bridges	¶¶259-277
4/30/2011	3 kilograms	Torres-Tellez	Flores	¶¶278-292
5/14/2011	908 grams	Flores	Beck	¶¶362-374
5/16/2011	9,774 grams*	Torres-Tellez/Tellez	part intended for Flores	¶¶293-306

* Seized

COCAINE DEALS				
Date	Quantity	From	To	
1/15/2011	1 ½ kilos	A.Hernandez/Acevedo-Marchan	Blount-Bridges	¶¶318-334
2/18/2011	2 kilos	Flores/Acevedo-Marchan	Blount-Bridges	¶¶239-258
2/18/2011	497.5 grams	Blount-Bridges	Mixon	¶¶247-250

*Seized

V. THE EVIDENCE

A. THE BLOUNT-BRIDGES DTO

1. BLOUNT Distributes Heroin, Totaling 124 Grams, to A UC on Five Occasions

21. On five separate occasions beginning on March 25, 2010, and continuing through June 24, 2010, BLOUNT, with others, provided a total 124 grams of heroin to the UC.

a. BLOUNT Distributes 19.9 Grams of Heroin to the UC on March 25, 2010

22. On March 25, 2010, the UC made a controlled purchase of 20 grams of heroin from BLOUNT. On March 25, 2010, at approximately 10:15 a.m., the UC received a telephone call from BLOUNT, using Target Phone 1.² This call was not recorded. During this call, BLOUNT asked

²The identification of DOMINGO BLOUNT and his voice in this Affidavit is based in part on the following: From March 25, 2010, to June 24, 2010, the UC contacted Target Phone 1 to arrange for the purchase of heroin on five occasions. During these five transactions, the UC spoke with the same individual over Target Phone 1 each time. On four of these five occasions, after the telephone conversations arranging for the purchase of heroin, the UC met with BLOUNT and obtained the heroin. BLOUNT was identified as the individual who supplied the UC with heroin after the UC and multiple other law enforcement officers viewed a known Illinois driver's license photograph of BLOUNT. Furthermore, during intercepted calls over Target Phone 1, several individuals have referred to the user of Target Phone 1 as "Mingo," a nickname used by BLOUNT, and others have also referred to the user of Target Phone 1 as "Domingo." BLOUNT was also identified as the user of Target Phone 3, as well as the user of telephone number (773) 793-2206 and telephone number (404) 901-6015, through voice comparisons conducted by DEA agents with the UC's recorded conversations with BLOUNT over Target

words to the effect of, “how many floors [grams of heroin] are you going up?” The UC responded with words to the effect of, “twenty [20 grams of heroin].” In a later telephone call from BLOUNT, using Target Phone 1, BLOUNT instructed the UC to meet him in the area of 75th Street.

23. On March 25, 2010, at approximately 11:00 a.m., the UC arrived at the parking lot of the Walgreen’s located at 11 East 75th Street, Chicago, Illinois. A short time later, the UC and surveillance officers (hereinafter “surveillance”) observed BLOUNT, driving a black GMC Yukon Denali with tinted windows (“the black GMC Denali”), arrive and park near the UC in the Walgreen’s parking lot. After the UC observed BLOUNT roll down his driver’s side window and motion to the UC, surveillance observed the UC exit his car and enter the passenger seat of the black GMC Denali, and a short time later, the UC exit the black GMC Denali and return to his undercover vehicle. Both vehicles then exited the parking lot.

24. Based upon a debriefing of the UC and a review of the audio recording of the conversation made by the digital recorder worn by the UC, the following occurred inside the black GMC Denali: when the UC entered the car, BLOUNT was sitting in the driver’s seat; the UC provided \$2,000 in cash to BLOUNT, who then provided to the UC a clear plastic bag containing suspect heroin.

Phone 1, as well as continued references to the user of these phones as “Mingo” and “Domingo.” Finally, on several occasions during this investigation, law enforcement personnel intercepted telephone calls involving BLOUNT’s use of Target Phone 1, Target Phone 3, telephone number (773) 793-2206 and (404) 901-6015, where BLOUNT and others agreed to meet in furtherance of narcotics transactions. On these occasions, law enforcement officers subsequently observed BLOUNT arrive at pre-arranged locations where the drug transactions occurred. In the summaries of the intercepted calls in this Affidavit in which BLOUNT is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to BLOUNT in each of these summaries is the same.

25. The substance provided by BLOUNT to the UC on March 25, 2010 was sent to the DEA laboratory where it was analyzed by an expert in forensic chemistry, and determined to consist of 19.9 grams of mixtures containing heroin.

b. BLOUNT Distributes 24.6 Grams of Heroin to the UC On March 30, 2010

26. On March 30, 2010, the UC made a controlled purchase of 25 grams of heroin from BLOUNT. On March 30, 2010, at approximately 2:18 p.m., the UC placed a consensually recorded telephone call to BLOUNT on Target Phone 1. During this call, the UC asked, “What’s up Big Dog, you around?” BLOUNT responded, “Yeah . . . waiting on you.” The UC asked BLOUNT, “You wanna meet me at the green walls [Walgreen’s], same spot [same location as previous transaction on March 25, 2010]?” BLOUNT responded in the affirmative, and they agreed to meet in fifteen minutes.

27. At approximately 2:28 p.m., the UC arrived at the parking lot of the Walgreen’s located at 11 East 75th Street in Chicago, and backed his vehicle into a parking space. At that time, the UC placed another telephone call to BLOUNT on Target Phone 1, and told BLOUNT that he was at the Walgreen’s. This call was not recorded. Approximately 15 minutes later, the UC and surveillance officers observed a red Dodge Charger bearing Ohio license plates (hereinafter “**Dodge Charger**”), arrive in the Walgreen’s parking lot, and pull front first into the space next to the UC’s vehicle, so that each car was facing in an opposite direction, with the driver’s side window of the **Dodge Charger** next to the driver’s side window of the UC’s vehicle.

28. According to surveillance, a debriefing of the UC and a review of the audio recording, the following occurred: BLOUNT rolled down his driver’s side window, and the UC also rolled down his driver’s side window. The UC asked, “25 [25 grams of heroin], right?” BLOUNT

responded affirmatively and extended his arm out the driver's side window of the **Dodge Charger**, and handed the UC a clear plastic bag containing a tan substance. The UC took the object from BLOUNT and brought it into the UC's car, and then the UC extended his hand out the window again, this time holding cash in the amount of \$2,250. BLOUNT extended his hand and took the cash, and then departed the area in the **Dodge Charger**.

29. The substance provided by BLOUNT to the UC on March 30, 2010 was sent to the DEA laboratory where it was analyzed by an expert in forensic chemistry, and it was determined to consist of 24.6 grams of mixtures containing heroin.

c. BLOUNT, Through LAMAR BLOUNT, Distributes 24.8 Grams of Heroin to the UC on May 1, 2010

30. On April 29, 2010, at approximately 4:17 p.m., the UC placed a telephone call to BLOUNT, who was using Target Phone 1. Only the UC's side of the conversation was recorded. During this call, the UC stated, "Hey, what's up with you kid? Can I run into you tomorrow [be supplied heroin by BLOUNT], man?" The UC then stated, "Well, what time you think you gonna be back. . . You gonna be gone for a minute or what?" The UC then stated, "Well, uh, what time you leaving tonight? I might try to catch up with you tonight. If I can't catch up with you tonight, I'm just gonna try and catch you before you, well when you get back." The UC then asked, "Oh, you can put me with somebody or what [have someone else deliver the heroin]?" According to the UC, BLOUNT explained in coded language during this call that he would have to meet with the UC to do the heroin transaction later the same day because BLOUNT was leaving town the following day. Later in the call, according to the UC, BLOUNT stated that his brother [LAMAR BLOUNT] could deliver the heroin to the UC the next day. BLOUNT and the UC agreed to speak later.

31. On April 30, 2010, at approximately 11:27 a.m., the UC placed a recorded telephone conversation to BLOUNT, who was using Target Phone 1. During that call, the UC stated, “Man, I wish I would have known [where] you was gonna be in the morning, man. I wouldn’t be the god damn fool all night, man.” The UC asked, “When you, uh, when you gonna be back, man?” BLOUNT responded, “I’m gonna have my brother [LAMAR BLOUNT]. You know what I’m saying. I’m just, cause I was up. I was just checking . . . that’s all. I’m gonna have my brother [LAMAR BLOUNT], so they’ll [heroin] be ready.” BLOUNT further stated, “I’m gonna leave it [heroin], you know what I’m saying, with him [LAMAR BLOUNT]. So, whenever you ready, he’ll [LAMAR BLOUNT] have it [heroin].”

32. On May 1, 2010, at approximately 1:25 p.m., the UC received a telephone call from BLOUNT, who was using Target Phone 1. During this call, BLOUNT told the UC that LAMAR BLOUNT would meet with the UC at Walgreen’s, and that LAMAR BLOUNT would arrive in a gold Cadillac truck.

33. On May 1, 2010, at approximately 1:38 p.m., surveillance observed the UC arrive at Walgreen’s and park in the parking lot. At approximately 1:42 p.m., the UC received a telephone call from BLOUNT, who was using Target Phone 1. This call was not recorded. According to the UC, BLOUNT instructed the UC to meet with LAMAR BLOUNT in the area of 75th Street and Wabash Avenue, Chicago, Illinois. The UC then proceeded to the area of 75th and Wabash Avenue, arriving a few minutes later.

34. At approximately 1:45 p.m., surveillance observed a gold Cadillac Escalade (hereinafter “**Cadillac Escalade**”) near 75th Street and Wabash Avenue. According to the surveillance, a debriefing of the UC and a review of the audio recording, the following occurred: the

Cadillac Escalade pulled next to the UC's vehicle; LAMAR BLOUNT³ was sitting in the passenger seat of the Escalade; LAMAR BLOUNT motioned, with his hand, for the UC to follow the **Cadillac Escalade**; the **Cadillac Escalade** and the UC's vehicle, followed by surveillance, then relocated to the area of 18 East 77th Street, Chicago, Illinois; there, LAMAR BLOUNT exited the passenger side door of the Escalade and walked to the driver's door of the UC's vehicle; the UC stated, "What's up big dog? Same thing, 25 [25 grams of heroin]?" LAMAR BLOUNT replied in the affirmative and reached his arm inside the driver's side window of the UC's vehicle and handed the UC a clear plastic bag of suspect heroin; the UC then handed LAMAR BLOUNT \$2,250 as payment for the heroin; seconds later, LAMAR BLOUNT pulled his arm from inside the driver's side window of the UC's vehicle with the money in his hand, and returned to the **Cadillac Escalade**, which then departed the area.

35. The substance provided by LAMAR BLOUNT on behalf of Domingo BLOUNT to the UC on May 1, 2010 was sent to the DEA laboratory, where it was analyzed by an expert in forensic chemistry, and determined to consist of 24.8 grams of a mixture containing heroin.

d. BLOUNT and COLE Distribute 25.6 Grams of Heroin to the UC On May 26, 2010

36. On May 26, 2010, at approximately 1:25 p.m., the UC placed a recorded telephone call to BLOUNT, who was using Target Phone 1. During this call, the UC asked, "Do you think I can slide across you today man [can I purchase heroin from you today?]" BLOUNT advised,

³The identification of LAMAR BLOUNT in the Affidavit is based in part on the following: After the meeting with the UC on May 1, 2010 was completed, the UC, who was previously familiar with the identity of LAMAR BLOUNT, confirmed that LAMAR BLOUNT was the individual who exited the gold Cadillac Escalade, met with the UC and provided the UC with approximately 25 grams of heroin. In addition, at the time that the Cadillac Escalade pulled next to the UC's vehicle, surveillance with previous knowledge of LAMAR BLOUNT, observed meeting with the UC on May 1, 2010, and recognized LAMAR BLOUNT as the passenger of the gold Cadillac Escalade who exited the Escalade, who reached his arm inside the UC's vehicle, and who then returned to the Escalade.

“Yeah, as soon as I come out this [auto] pound, I’m gonna hit your phone. I’m in the pound getting this car out.” At approximately 2:47 p.m., BLOUNT, using Target Phone 1, called the UC. In this call, BLOUNT arranged to meet the UC at the Walgreen’s parking lot on 75th Street in Chicago.

37. On May 26, 2010, at approximately 3:06 p.m., surveillance observed the UC arrive at and park in the Walgreen’s parking lot, exit his vehicle and enter the front passenger seat of the **Dodge Charger** parked in the lot. BLOUNT was observed by surveillance and the UC sitting in the driver’s seat when the UC entered the **Dodge Charger**.

38. Based upon a briefing of the UC, a review of the audio recording made by the digital audio recording device worn by the UC, and observations by surveillance, the following occurred: After the UC got into the **Dodge Charger** with BLOUNT, the UC asked, “Ah, shit, what can we do on that, can I get a better price on 100 [100 grams of heroin]?” BLOUNT responded, “I ain’t nothing but 5 dollars [profit per gram of heroin].” The UC stated, “The regular cat [supplier] I fuck with [purchase narcotics from], I usually do 100s [purchase 100 grams of heroin at a time], but I was happy with [the quality of] that last shit [heroin supplied by BLOUNT].” BLOUNT assured him, “All the time, no doubt [the quality of the heroin sold by BLOUNT would be good].” The UC asked, “But its [the heroin] like that [high quality] all the time?” BLOUNT responded, “Yeah, my peoples [supplier] back.” During the conversation, the UC gave BLOUNT \$2,250 to purchase the 25 grams of heroin. BLOUNT then directed the UC to a beige Grand Marquis parked nearby in the Walgreen’s lot, to obtain the heroin. The UC exited the **Dodge Charger** and got into the back of the beige Grand Marquis, which was occupied by two males in the front seat. The passenger,

COLE,⁴ handed the UC a clear plastic bag containing suspect heroin. The UC then returned to his vehicle and left the parking lot. After the heroin transaction was completed, surveillance observed BLOUNT and the occupants of the Grand Marquis switch cars.⁵

39. The substance provided by BLOUNT to the UC on May 26, 2010 was sent to the DEA laboratory, where it was analyzed by an expert in forensic chemistry, and determined to consist of 25.6 grams of a mixture containing heroin.

e. BLOUNT Distributes 29.8 Grams of Heroin to the UC on June 24, 2010

40. On June 23, 2010, at approximately 3:13 p.m., the UC placed a consensually recorded telephone call to BLOUNT, who was using Target Phone 1. During this telephone call, the UC stated, “I’m probably gonna try to slide through there [purchase heroin from BLOUNT] in the morning tomorrow. You gonna be around?” BLOUNT said, “I’m around.” The UC asked, “Alright, you think a 30 piece [30 grams of heroin] would be good?” BLOUNT responded affirmatively. The UC stated, “Alright, I’ll hit you tomorrow then.”

⁴The identification of COLE in this Affidavit is based in part on the following: When the UC entered the beige Mercury Grand Marquis, he left the rear door open, and surveillance was able to observe the front passenger of this vehicle. Shortly thereafter, surveillance observed BLOUNT enter the beige Mercury Grand Marquis and depart the area, while the front passenger and another individual entered the **Dodge Charger** and departed the area. At approximately 3:45 p.m., law enforcement officers conducted a traffic stop on the red Dodge Charger and positively identified COLE as the driver of this vehicle after COLE provided an Illinois driver’s license in his name. After, a surveillance officer who observed the front passenger of the Mercury Grand Marquis at the Walgreen’s, positively identified a known photograph of COLE as the same individual who had occupied the front passenger seat of the beige Mercury Grand Marquis during the meeting with the UC. Furthermore, the UC was later shown an Illinois driver’s license photograph of COLE, and the UC positively identified COLE as the individual who provided the UC with the heroin in the beige Mercury Grand Marquis.

⁵Records from Avis/Budget obtained by DEA reflect that the beige Mercury Grand Marquis was rented on April 28, 2010, until May 26, 2010, by a female, with BLOUNT listed as an additional driver on the contract.

41. On June 24, 2010, at approximately 2:09 p.m., the UC placed a consensually recorded telephone call to BLOUNT on Target Phone 1. During this telephone call, the UC asked, “Hey, you remember what I said yesterday [the UC was referring to his conversation with BLOUNT the previous day asking to purchase 30 grams of heroin]?” BLOUNT stated, “Yeah.” The UC asked, “Alright, what time?” BLOUNT subsequently stated, “Give me like five minutes, tops. Let me just call him [a narcotics supplier or associate] and I’ll call you right back. See how long I fittin’ to be.”

42. On June 24, 2010, at approximately 2:12 p.m., the UC received a consensually recorded telephone call from BLOUNT, who was using Target Phone 1. During this telephone call, BLOUNT stated, “Give me like 15 minutes and I’ll meet you by the, you know, the Walgreen’s.” At approximately 2:23 p.m., surveillance observed BLOUNT exit his residence and depart the area in a white Lincoln four-door vehicle.

43. At approximately 2:36 p.m., the UC arrived at the parking lot of the Walgreen’s, 11 East 75th Street, Chicago, Illinois, where he parked his undercover vehicle. At approximately 2:44 p.m., the UC and surveillance observed BLOUNT, driving the white Lincoln four-door, arrive at the Walgreen’s parking lot and park. At approximately 2:47 p.m., surveillance observed the UC exit his vehicle and enter the passenger seat of BLOUNT’s white Lincoln four-door.

44. Based on surveillance, a review of the recording of the conversation and a debriefing of the UC, the following occurred: When the UC entered the white Lincoln, he handed \$2,700 to BLOUNT. At approximately 2:51 p.m., the **Cadillac Escalade** arrived at the Walgreen’s and parked in the lot. At approximately 2:52 p.m., a black Ford entered the Walgreen’s parking lot, driven by Individual A. Individual A motioned for BLOUNT to come to the vehicle. At approximately 2:53 p.m., BLOUNT exited the white Lincoln, walked to the **Cadillac Escalade**, opened the passenger

door and reached into the **Cadillac Escalade**. Moments later, BLOUNT approached the driver's side of the black Ford and reached into the open driver's side window of the vehicle. BLOUNT then walked back towards his white Lincoln four-door, opened the front passenger seat where the UC was seated, and handed the UC a clear plastic bag containing suspect heroin. The UC then exited the white Lincoln, returned to his vehicle and departed the area. Shortly thereafter, the **Cadillac Escalade**, the black Ford and BLOUNT, driving the white Lincoln four-door, departed the area.

45. The substance provided by BLOUNT to the UC on June 24, 2010 was sent to the DEA laboratory, where it was analyzed by an expert in forensic chemistry, and determined to consist of 29.8 grams of a mixture containing heroin.

2. The BLOUNT-BRIDGES DTO Purchases a Kilogram of Heroin on July 15, 2010, from the FLORES DTO, Brokered by ACEVEDO-MARCHAN and Gambino

46. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that on July 15, 2010, BLOUNT and BRIDGES received a kilogram of heroin from FLORES, in a transaction brokered by Gambino and ACEVEDO-MARCHAN.

47. On July 14, 2010, at approximately 6:58 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #192) to Gambino, who was using Target Phone 2.⁶ During this call,

⁶The identification of Gambino and his voice in this Affidavit is based in part on the following: During an intercepted call (Call #2016) over Target Phone 2, Gambino confirmed that his first name is "Luis," he stated his last name as "Gambino," and also confirmed his address at "5340 South Rockwell Street, Apt. 2, Chicago, Illinois." During another intercepted call (Call #2519) over Target Phone 2, Gambino stated, "Hi, my name is Luis Gambino." Later in the call, Gambino stated, "Please call me at this number, 773-430-1939 [Target Phone 2]." From August to December 2010, based on intercepted calls over Target Phone 2 arranging narcotics transactions, surveillance on several occasions and observed Gambino at the locations where these narcotics transactions subsequently occurred. Finally, on March 15, 2011, Gambino was arrested by ICE on a complaint charging him with illegal reentry filed in the Northern District of Illinois, in case no. 11 CR 200; in that case, Gambino admitted his identity. In the summaries of the intercepted calls in this Affidavit in which Gambino is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to Gambino in each of these summaries

Gambino asked, "Are you ready [to conduct the heroin transaction]?" BLOUNT replied, "Aye, I'm going to try and get the black truck [the black GMC Denali, which is equipped with a concealed compartment]. I'm going to see if they are through with the black truck." Gambino responded, "I want that, I want that . . . 65 [believed to be a reference to \$65,000, which, based on my training and experience, is the approximate value for one kilogram of heroin]." BLOUNT stated, "I still think the old man [another supplier] is better [has better prices]." Gambino stated, "Alright then, give me a call when you ready because I'm over here by the house [where the heroin was stored]." Telephone records for Target Phone 2 reflect that, immediately after this call, Target Phone 2 had two contacts with Target Phone 4, a phone used by ACEVEDO-MARCHAN, as discussed later in this Affidavit.

48. On July 14, 2010, at approximately 7:36 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #233) to Gambino, who was using Target Phone 2. During this call, BLOUNT stated that his truck was not yet ready, and that they may need to do the heroin deal in the morning. Gambino stated that he would check with his source of supply and call BLOUNT back. Toll analysis of Target Phone 2 revealed approximately five contacts with Target Phone 4, used by ACEVEDO-MARCHAN, between the 7:36 p.m. call described above, and the 8:32 p.m. call described below.

49. On July 14, 2010, at approximately 8:32 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #293) from Gambino, who was using Target Phone 2. During this call, Gambino asked, "Are you ready?" BLOUNT explained that he still had not gotten his truck back, and Gambino instructed BLOUNT to call when BLOUNT was ready to leave for the north

is the same.

side of Chicago, so that Gambino could meet him. Toll analysis of Target Phone 2 revealed that immediately after this call, Target Phone 2 was in contact with Target Phone 4.

50. On July 14, 2010, at approximately 9:03 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #338) from BRIDGES.⁷ During this call, BRIDGES asked, "Yeah, where you at now?" BLOUNT responded, "Man, I'm still by the park, man. I'm about to cancel this shit [heroin transaction with Gambino] 'til the morning." BRIDGES replied, "Alright."

51. On July 14, 2010, at approximately 9:25 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #366) from Gambino, who was using Target Phone 2. During this call, Domingo BLOUNT advised, "Man, they couldn't get that mother fucker to come on, man [BLOUNT's car was still not fixed]. I'm still up here in this shop." Gambino asked, "Okay, let's do this [heroin transaction] tomorrow then, okay?" Domingo BLOUNT replied, "Early though man,

⁷The identification of BRIDGES and his voice in this Affidavit is based in part on the following: On July 15, 2010, pursuant to intercepted calls over Target Phone 1, law enforcement officers conducted surveillance at 5320 South Wood Street, Chicago, Illinois. During one intercepted call (Call #1060), BLOUNT and BRIDGES, using (773) 641-6828, agreed to meet at "Woods" [5320 South Wood Street]. Approximately one hour later, law enforcement officers observed BLOUNT and BRIDGES depart 5320 South Wood Street, in tandem vehicles, en route to a meeting with Gambino on the north side of Chicago. Surveillance then observed BLOUNT and BRIDGES meet at a Marathon Gas Station, located at the intersection of Armitage Avenue and Pulaski Road, Chicago, Illinois. A law enforcement officer who observed this meeting later viewed a known Illinois driver's license photograph of BRIDGES and positively identified BRIDGES as the individual who met with BLOUNT in the gas station parking lot. BRIDGES also was identified as the user of telephone numbers (773) 749-8708, (773) 408-8654 and (773) 367-2210 through voice comparisons conducted by DEA agents with intercepted calls involving BRIDGES' use of telephone number (773) 641-6828, where BRIDGES had been identified through surveillance. Also, during intercepted telephone calls, BLOUNT and others have referred to the user of telephone numbers (773) 641-6828, (773) 749-8708, (773) 408-8654 and (773) 367-2210 as "Gabe," short for BRIDGES' first name. Finally, on several occasions during the course of this investigation, law enforcement personnel telephone calls were intercepted involving BRIDGES' use of telephone numbers (773) 641-6828, (773) 408-8654 and (773) 367-2210, where BRIDGES and others agreed to meet in furtherance of narcotics transactions. During these several occasions, law enforcement officers subsequently observed BRIDGES arrive at pre-arranged locations where the drug transactions occurred. In the summaries of the intercepted calls in this Affidavit in which BRIDGES is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to BRIDGES in each of these summaries is the same.

let's do it early though." Gambino asked, "Tomorrow, right?" Domingo BLOUNT responded, "Yeah, early." Gambino stated, "Okay, I'll call you in the morning then." Telephone records for Target Phone 2 reflect that immediately after this call, Target Phone 2 had a contact with Target Phone 4.

52. On July 15, 2010, at approximately 12:51 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #987) from Gambino, who was using Target Phone 2. During this call, Gambino asked, "What's up Amigo, you ready [to conduct the heroin transaction]?" BLOUNT replied, "I'm waiting on you." Gambino responded, "Okay, we gonna do this [heroin transaction] around 2:00 . . . So, start heading where we were yesterday [location of the heroin] at 2:00." BLOUNT agreed. Telephone records for Target Phone 2 reflect that between 1:57 p.m. and 3:07 p.m., Target Phone 2 had seven contacts with Target Phone 4.

53. On July 15, 2010, at approximately 2:19 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #1060) to BRIDGES. During this call, BLOUNT asked, "Are you ready to meet me at Woods [5320 South Woods Street, Chicago, Illinois], get on my heels [follow BLOUNT to the heroin transaction with Gambino, in order to conduct counter-surveillance of the transaction]?" BRIDGES agreed. At approximately 3:10 p.m., surveillance observed BLOUNT depart the residence at 5320 South Wood Street in the black GMC Denali, and, in tandem, BRIDGES depart in the **Cadillac Escalade**.

54. On July 15, 2010, at approximately 3:44 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #1133) to BRIDGES. During this call, BLOUNT stated, "Quit riding my ass like that. You don't want a mother fucker to know exactly that you following me. Know what I'm saying?" BRIDGES replied, "Alright." BLOUNT stated, "Don't you know that Grand Prix

[law enforcement vehicle], that black one, it's been behind us a minute too, ain't it?" BRIDGES asked, "Huh?" BLOUNT responded, "That black Grand Prix?" BRIDGES asked, "It was behind us then?"

55. On July 15, 2010, at approximately 3:55 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #1137) to Gambino, who was using Target Phone 2. During this call, Gambino asked, "Where you at?" BLOUNT responded, "I'm at the gas station where you always see me at." Gambino responded, "Man, brother, I'm over here where, umm. . ." BLOUNT later stated, "I remember where I was at. I remember where I was at. Don't say that over the phone [BLOUNT did not want Gambino to give out a location over the phone]. I remember where I was at."

56. At approximately the same time as the call summarized in the preceding paragraph, surveillance observed BLOUNT arrive at a Marathon Gas Station, located at the intersection of Armitage Avenue and Pulaski Road in Chicago, Illinois, in the black GMC Denali. Surveillance also observed BRIDGES, in the **Cadillac Escalade**, circle the block around the Marathon Gas Station and then enter the parking lot. Law enforcement officers then observed BLOUNT and BRIDGES both exit their vehicles and briefly meet in the parking lot. At approximately 4:00 p.m., surveillance observed BLOUNT re-enter the black GMC Denali, BRIDGES re-enter the **Cadillac Escalade**, and then both vehicles departed the Marathon Gas Station.

57. On July 15, 2010, at approximately 4:05 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #1148) to Gambino, who was using Target Phone 2. During this call, Gambino advised, "I'm at the burrito place, man." BLOUNT replied, "Man, I'm over here. You told me to come over here. I'm in the back, man." Gambino responded, "Okay, okay, just stay right

there, man. Come in the burrito place, man." Later in the call, Gambino stated, "I see you, you see me? Just park right there, man. Just park right there."

58. On July 15, 2010, beginning at approximately a few minutes after 4:05 p.m., surveillance observed the following: (a) a black GMC Denali and the **Cadillac Escalade** arrived in the area of El Burrito Amigo Restaurant, located at 5238 West Grand Avenue, Chicago, Illinois; (b) BLOUNT exited the black GMC Denali and entered the restaurant; (c) a short time later, the **Cadillac Escalade** circled the area around the restaurant; (d) surveillance agents were not positioned to observe BLOUNT exit the restaurant; however, at approximately 4:20 p.m., surveillance driving by the El Burrito Amigo Restaurant observed the black GMC Denali exit the parking lot of the El Burrito Amigo Restaurant; (e) the black GMC Denali drove to 2059 N. Lockwood, later determined to be FLORES' residence, and pulled into the garage behind the residence; (f) after approximately five minutes, the black GMC Denali exited the same garage, after which the black GMC Denali and the **Cadillac Escalade** met up in the area of the El Burrito Amigo Restaurant and then departed in tandem.

59. On July 15, 2010, beginning at approximately 4:30 p.m., surveillance observed the following: (a) Gambino and FLORES were standing inside the garage located at 2059 N. Lockwood;⁸ (b) approximately 20 minutes later, FLORES exited the door of the residence at 2059

⁸The identification of FLORES and his voice in this affidavit has been based on the following: During certain intercepted telephone calls, some individuals have referred to the user of telephone numbers (773) 619-6742, (773) 800-8401, (773) 408-8106, and Target Phone 5, Target Phone 7, Target Phone 9, Target Phone 12 and Target Phone 13 as "Arturo." On July 15, 2010, pursuant to intercepted calls over Target Phone 1, law enforcement officers conducted surveillance at 2059 North Lockwood Avenue, Chicago, Illinois, in anticipation of a one kilogram heroin transaction. At this location, law enforcement officers observed the individual now known as FLORES standing with Gambino in the garage behind the residence after the heroin transaction had occurred. A commercial database inquiry of 2059 North Lockwood Avenue revealed that FLORES is associated with 2059 North Lockwood Avenue. Since that time, pursuant to intercepted calls involving the above telephone numbers, law enforcement

North Lockwood Avenue, carrying an orange plastic bag, entered a black Nissan Pathfinder (hereinafter “**Black Nissan Pathfinder**”) and drove away; (c) FLORES drove to near a residence located at 5516 West Wrightwood Avenue in Chicago, Illinois (hereinafter “**the 5516 West Wrightwood Avenue Residence**”), where he parked and exited the **Black Nissan Pathfinder**, carrying the orange plastic bag; (d) a surveillance officer walking by observed that the orange bag contained bundles of United States Currency; (e) FLORES carried the orange plastic bag into a residence; at approximately 5:26 p.m., law enforcement officers observed FLORES exit **the 5516 West Wrightwood Avenue Residence** without the orange plastic bag, and re-enter the **Black Nissan Pathfinder**; (f) surveillance followed FLORES until, at approximately 5:35 p.m., FLORES re-entered the residence located at 2059 North Lockwood Avenue.

60. Based upon my knowledge of the investigation, the intercepted calls and surveillance, I believe that, pursuant to Gambino’s arrangements, BLOUNT picked up the kilogram of heroin from FLORES in the garage at 2059 N. Lockwood, Chicago, Illinois, at which time BLOUNT gave FLORES the money for the heroin. FLORES then took the money in an orange bag to the residence on Wrightwood Avenue.

3. The BLOUNT-BRIDGES DTO Sends 428.4 Grams of Heroin to Cincinnati on July 24, 2010

officers have conducted surveillance on several occasions during suspected narcotics transactions, and have observed the same individual (FLORES) that was observed in the garage at 2059 North Lockwood Avenue. Multiple law enforcement officers have since viewed a known booking photograph of Arturo FLORES, and positively identified him as the individual observed on several occasions during suspected drug transactions. Furthermore, Spanish linguists contracted by DEA identified FLORES as the user of telephone numbers (773) 800-8401, (773) 408-8106, and Target Phone 5, Target Phone 7, Target Phone 9, Target Phone 12 and Target Phone 13, through voice comparisons conducted with intercepted calls involving FLORES’ use of telephone number (773) 619-6742, ultimately concluding that all of the voices are the same. In the summaries of the intercepted calls in this Affidavit in which FLORES is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to FLORES in each of these summaries is the same.

61. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on July 23, 2010, the BLOUNT DTO agreed to supply a half kilogram of heroin to GRISBY, for distribution. The BLOUNT DTO sent the heroin by having CRUSOE and others transport the heroin in a car equipped with a secret compartment. Pursuant to a traffic stop in Indiana, law enforcement seized the heroin intended for GRISBY. After the traffic stop, BLOUNT, GRISBY and CRUSOE discussed the events surrounding the seizure during intercepted telephone calls.

62. On July 23, 2010, at approximately 1:21 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #9599) to GRISBY⁹. During this call, GRISBY asked, "You think, when am I gonna see you, PM or AM?" BLOUNT replied, "PM or AM, which one do you want me to?" GRISBY responded, "Shit, they can come the PM tonight [GRISBY confirmed that BLOUNT could send his drug couriers with heroin to Cincinnati later that night]. It don't matter." BLOUNT stated, "Let me try and find out." GRISBY replied, "Whatever's good for you all. Whatever's good for them." BLOUNT responded, "I'll find out and see right quick."

⁹The identification of GRISBY and his voice in this Affidavit has been based in part on the following: In June of 2010, a source of information (hereinafter, "SOI-3") informed law enforcement officers that Myron GRISBY (a/k/a Zane) is involved in the distribution of heroin. SOI-3 also identified multiple telephone numbers used by GRISBY in furtherance of his drug trafficking, including (513) 293-8805 and (513) 497-3136. SOI-3 further stated that GRISBY receives his heroin from an unknown source of supply from Chicago, Illinois. SOI-3 positively identified GRISBY to law enforcement officers through a known photograph of GRISBY. The telephone number provided by SOI-3 for GRISBY has been corroborated by law enforcement officers, in that law enforcement officers have intercepted several calls over Target Phone 1 between BLOUNT and GRISBY, using (513) 293-8805, during which BLOUNT referred to the user of (513) 293-8805 as "Myron." Moreover, the information from SOI-3 that GRISBY received heroin from a source of supply in Chicago was corroborated by BLOUNT's sending heroin to GRISBY on July 23, 2010. In the summaries of the intercepted calls in this Affidavit in which GRISBY is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to GRISBY in each of these summaries is the same.

63. On July 23, 2010, at approximately 5:04 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #9800) from CRUSOE.¹⁰ During this call, BLOUNT stated, "Shit, need to go holla at Myron [need to deliver heroin to GRISBY]." CRUSOE and BLOUNT discussed that CRUSOE would leave in the morning, and BLOUNT told CRUSOE to let GRISBY know. When CRUSOE asked for GRISBY's number, BLOUNT recited the telephone number used by GRISBY intercepted over Target Phone 1. Less than an hour later, BLOUNT, using Target Phone 1, received an incoming call (Call #9880) from CRUSOE. During this call, CRUSOE stated that GRISBY suggested that she leave for Cincinnati that night.

64. On July 23, 2010, at approximately 7:02 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #9966) from GRISBY. During this call, BLOUNT stated, "Yeah, I just talked to her [CRUSOE], right, and so if she be leaving now, it will be 9:00, so she might make it around you [Cincinnati] by what, one [1:00 a.m. the following day]?" GRISBY replied, "Yeah, that's cool." Later in the call, GRISBY asked, "Hey, how many were there [GRISBY asked how much heroin BLOUNT was sending to Cincinnati with CRUSOE]?" BLOUNT advised, "I'm gonna

¹⁰The identification of CRUSOE in this Affidavit is based in part on the following: On May 13, 2010, law enforcement officers identified a red Chevrolet Impala driven by BLOUNT in Cincinnati, Ohio. Enterprise Rent-A-Car records pertaining to the rental contract for this vehicle reflect that the car was rented by OMESSIA CRUSOE, who provided an address of 2710 South State Street, Apt. 305, Chicago, Illinois, and also provided telephone number (312) 674-9623 as a home phone number and telephone number (773) 447-4971 as her office number. Numerous drug-related conversations have been intercepted over Target Phone 1 with both telephone numbers provided by CRUSOE on the rental contract. Furthermore, during certain intercepted calls over Target Phone 1, as described herein, BLOUNT and others have referred to the user of telephone number (773) 447-4971 and (312) 674-9623 as "Omeshia." Lastly, CRUSOE was identified by law enforcement officers on July 23, 2010, during a traffic stop in which she produced her driver's license, in which heroin was seized from the vehicle she was driving. After the traffic stop, CRUSOE was intercepted over Target Phone 1 using telephone number (773) 447-4971, talking about the traffic stop. In the summaries of the intercepted calls in this Affidavit in which CRUSOE is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to CRUSOE in each of these summaries is the same.

go, you know what I'm saying, then I'm gonna tell you exactly. I know it's about 440 [440 grams of heroin]. If I'm not mistaken, 440 [440 grams of heroin]."

65. On July 23, 2010, at approximately 8:42 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #10070) to GRISBY, and informed GRISBY, "They're on their way though [BLOUNT advised that CRUSOE, Individual B and Individual C were en route to Cincinnati, Ohio]." GRISBY asked, "What was it [weight of heroin]?" BLOUNT advised, "440 [440 grams of heroin]."

66. At approximately 8:47 p.m., surveillance observed BLOUNT exit the black GMC Denali at 5320 South Wood Street, in Chicago, and, approximately five minutes later, CRUSOE, Individual B and Individual C entered the black GMC Denali and departed the area. Surveillance followed the black GMC Denali out of Illinois and into Indiana.

67. At approximately 9:51 p.m., an Indiana State Police ("ISP") trooper followed the black GMC Denali on Interstate 65 for approximately ½ mile while the vehicle traveled 70 miles per hour in a 55 miles per hour zone. The ISP trooper pulled the car over near Merrillville, Indiana. The ISP trooper asked CRUSOE, the driver, for identification. CRUSOE provided the ISP trooper with an Illinois driver's license in her name and bearing her photo. The ISP trooper initially observed CRUSOE to be extremely nervous, more than would be expected for a traffic stop. When asked, CRUSOE could not provide the ISP trooper with the name of the registered owner of the vehicle. CRUSOE told the ISP trooper she was en route to Cincinnati to see her kids. The ISP trooper asked CRUSOE if there were any illegal drugs in the vehicle, to which CRUSOE replied words to the effect of, "No, if you want to check, go ahead." After providing CRUSOE with a

written warning for speeding, the ISP trooper once again asked CRUSOE if there was anything illegal in the car, to which CRUSOE repeated, "No, you can check it if you want to."

68. The ISP trooper subsequently called an ISP K-9 unit for assistance. The ISP trooper requested identification of the other two passengers of the vehicle, which they provided, and requested that they exit the vehicle. At this time, the ISP K-9 officer and his K-9, "Blackie," conducted a sniff of the vehicle. The ISP K-9 officer indicated that "Blackie" gave a positive alert to the vehicle, indicating the presence of the odor of narcotics. The ISP trooper told CRUSOE that he needed to conduct a further search of the black GMC Denali at an alternate location, due to heavy traffic and dangerous conditions on the interstate. According to the ISP trooper, CRUSOE immediately stated her desire to leave and told the trooper that they [CRUSOE, Individual B and Individual C] would go to either the nearby Denny's or Hooters. Shortly after they left, but before the vehicle was moved, law enforcement officers examined the inside of the vehicle and located a hidden compartment built into the passenger side airbag area of the black GMC Yukon Denali. The compartment was opened and found to be empty.¹¹

69. On July 23, 2010, at approximately 10:24 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #10168) from CRUSOE. During this call:

(a) CRUSOE stated, "G, they [police] got us, bro." BLOUNT asked, "Who? Speeding?" CRUSOE replied, "The police. They just told us, G. They, they had the dogs and

¹¹The ISP trooper then went to the Denny's before moving the car to find CRUSOE, but she and the passengers were not there. The next day, when CRUSOE called to ask about the vehicle, the ISP trooper asked her where she and the passengers had gone, and CRUSOE claimed that they had gone to Denny's. The ISP trooper stated that he had gone to Denny's, but could not find them. CRUSOE did not respond. During that telephone conversation, the ISP trooper also asked CRUSOE for her telephone number to call her back, and CRUSOE responded that she did not have a telephone number and that she would call the ISP trooper back on the following Monday. CRUSOE never called the ISP trooper back.

everything. Me, Individual C and Individual B is walking. They told us to go get something to eat. They said we got to do a little more searching. There's a secret compartment on this car. We walking, G. He told us to go get something to eat. G, there's five cars on the truck, G. They got the dogs and everything." BLOUNT stated, "Yeah, you lying." CRUSOE stated, "On my mama, G. Come on, fuck that car, they gotta . . . wait . . . We're walking right now. They let us run across the expressway. They said they're going to come back and get us. The truck is still up there, G. They [police] on the truck. They didn't find nothing, G. There's a secret compartment on the car, G, and they got to check it. They going to search it [the black GMC Yukon Denali], really.";

(b) BLOUNT asked, "They're [police] searching it? Really?" CRUSOE replied, "Hell yeah, G. They said they're going to come back and get us from Denny's or Hooter's." Later in the call, CRUSOE stated, "So Mingo, what do you want us to do? You want us to leave?" BLOUNT replied, "It [heroin] ain't in no compartment. It [heroin] ain't in no compartment." CRUSOE remarked, "He said it [heroin] ain't in no compartment. So, we good, G. What do you want us to wait?" BLOUNT stated, "See, that's trickeration. That's a trickeration move. See what I'm saying?" CRUSOE stated, "Right, you want me to wait, G? What? Cause, what you want me to do?" BLOUNT replied, "It ain't nothing. They gonna come back and give you the car." Later in the call, BLOUNT repeated, "But it [heroin] ain't in that compartment, you see what I'm saying? . . . It [heroin] ain't in the compartment, shit. I don't even know how to judge, you see what I'm saying.";

(c) Later in the call, CRUSOE stated, "Hold on Mingo, Individual C wants you." At this time, Individual C started using CRUSOE's phone. During this call, BLOUNT asked, "They didn't find the stash spot [concealed compartment], did they?" Individual C replied, "No, they're

telling her, dude. The dog got to sniffing up under the hood and under the car. So, dude is like the dog is acting like he found something. The dog never barked or nothing. I don't know if he's [police officer] running a game, trying to get a mother fucker to tell something and all that." Later in the call, Individual C explained that the IPS trooper had asked who owned the car, and that "She [CRUSOE] said her brother. She said 'Jerry Thomas.'" BLOUNT later responded, "I meant to tell her [CRUSOE], you know [the registered owner of the truck].";

(d) After CRUSOE took back the phone, BLOUNT stated, "There ain't nothing in the compartment, you see what I'm saying?. . . I don't never, I don't never put nothing [heroin] in the compartment, you see what I'm saying?. . . No, it [heroin] ain't in. See, if they [police] been in the car, they ain't never found it [heroin] already, see what I'm saying? They been in the car already with the dog, right?" CRUSOE responded, "Yeah, and it's still in there, but I'm with you, whatever you want me to do . . . So, what you want me to do, wait for them?" BLOUNT stated, "Yeah, I'm saying, cause it [heroin] ain't in the . . . you see what I'm saying. I got a better spot in there [BLOUNT explained that the heroin was hid inside a better location of the black GMC Yukon Denali]. I got a better spot in there, O, but it [heroin] ain't in there."

70. On July 23, 2010, at approximately 10:38 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #10173) to GRISBY. During this call, BLOUNT asked, "You talk to shorty [CRUSOE] and them?" GRISBY replied, "I ain't talk to them since they been on the road." BLOUNT advised, "Right, right. Well, the bitch [CRUSOE] just called me. She was like the peoples [police] had them right." GRISBY responded, "Yeah." BLOUNT replied, "She [CRUSOE] say they [police] came, they had the dogs, and put the dogs in the car, took the dog out the car, then put the dogs under the hood, you know what I'm saying? Then, say it's a compartment [concealed

compartment] in there somewhere." GRISBY asked, "Swear they said that?" BLOUNT advised, "Yeah, call shorty [CRUSOE] phone so she can tell you, you know what I'm saying." BLOUNT explained that CRUSOE was just waiting, and GRISBY asked, "Waiting on them to come back looking for a department [concealed compartment]?" BLOUNT stated, "Yeah, but you know I don't never put it [heroin] in there [concealed compartment]." GRISBY replied, "Still though, but you get what I'm saying. Who the fuck would, that don't even make sense to me. I'm fittin' to call her [CRUSOE] phone."

71. On July 23, 2010, at approximately 10:54 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #10187) to CRUSOE. During this call, BLOUNT stated, "Listen, listen, listen. If they [police officers] would, if they would have it [found the heroin in the vehicle], the dog [drug canine] would have found it [heroin] if anything, you see what I'm saying? Did you hear me? . . . They [police] just trying to find out the compartment at. That's all really, you know what I'm saying?" CRUSOE responded, "Uh-huh." BLOUNT continued, "That's all it really was, cause they really was thinking something in there [in the hidden compartment], they..." CRUSOE then asked, "So do you think . . . do you think that they [the police] are going to find it [the heroin]?" BLOUNT replied, "Naw, naw. Hell naw. Know what I'm saying? Naw, naw, naw, shorty. Know what I'm saying? If I'd a thought that I would have told you be up . . . make them be think it's a compartment, but they [the police] probably got that little magnet thing [tool used to locate/open hidden compartments], you know what I'm saying? If you got that magnet thing [tool used to located/open hidden compartments], you hear that click. That's why I told Myron [GRISBY], he be having them magnets in the car." CRUSOE asked, "He [GRISBY] left them [magnets] in there?"

BLOUNT replied, "Well, I be telling him to get some . . . down there [in Cincinnati] and leave some down here [in Chicago]. You see what I'm saying?"

72. On July 23, 2010, at approximately 11:17 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #10208) from CRUSOE. During this call, BLOUNT stated, "Better come back with the truck or you all gone, and now, what?" CRUSOE stated that she would leave and return for the truck the next day." BLOUNT responded, "How you gonna come tomorrow? The truck ain't, I gotta get the white man [the registered owner, Owner A, an individual who owns a car dealership/auto shop in Cincinnati] to come on with it. They don't give it back to you all. You see what I'm saying. Then, I have the white man to come, you see what I'm saying?" BLOUNT later stated, "It [heroin] ain't, it ain't even near that [concealed compartment], you know what I'm saying?" BLOUNT subsequently asked, "Didn't Myron [GRISBY] call you?" CRUSOE advised, "Yeah, but he [GRISBY] called me, he called me to leave." BLOUNT responded, "Man, I don't know, let me call him back, man."

73. On July 23, 2010, at approximately 11:19 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #10210) to GRISBY. During this call, BLOUNT stated, "Yeah, she [CRUSOE] said you told her to leave." GRISBY replied, "Man, she's [CRUSOE] nervous, man. I told her, I told her, like man, don't be nervous and then she like, 'Man, my first instinct was to leave' . . . she nervous than a mother fucker." BLOUNT responded, "But, okay, she leave though, now how we know how about getting the truck? Man, I just, that, that, gonna put me. Man, shit, you see what I'm saying?" GRISBY replied, "The shit don't, but then, then, like I'm telling her. They said sit at Denny's. Then, my people would be the only mother fucker to come get the truck even if they keep it." BLOUNT asked, "But, but, but, but . . . okay. By them getting nervous and

leave, they just make it look way more suspicious, don't it [BLOUNT believed that, by CRUSOE and Individual C leaving the vehicle with the police, it looked more suspicious like they were trying to hide something]?" GRISBY stated, "Yeah, it do though. It do."

74. Approximately 15 minutes later, BLOUNT, using Target Phone 1, placed another outgoing call (Call #10216) to GRISBY. During this call, BLOUNT and GRISBY discussed again that CRUSOE was nervous. Later in the conversation, GRISBY stated, "Yeah, that, that story [CRUSOE's account of the traffic stop on July 23] ain't, it just don't seem right, I don't know. Talking 'bout it's a secret compartment, like . . . for them [the police] to know that, somebody had to tell 'em . . ."

75. On July 23, 2010, at approximately 11:59 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #10236) to GRISBY. During this call, GRISBY stated that he had called CRUSOE, and was waiting for her to call him back.¹² GRISBY further stated, "Anyhow, I'm like, I can't even sleep, man. I don't even know. Like it just gonna, it make me feel like somebody stole the [heroin] . . . you know, I don't understand. That's why I was thinking of rip, like, damn! Somebody stole this [heroin] . . . stole it [heroin]? Is it . . . you know, what's the plan, like was it a, you know, was it a plan [GRISBY questions the possibility of individuals impersonating police in order to steal the heroin contained in the vehicle]? Cause then it just be more, like the police, they, they didn't give her a [business] card or anything like will locate this, this [police] station. You know, it, that shit [traffic stops conducted by police] be handled way different than that."

¹² In fact, between 10:43 p.m. on July 23, 2010, which was just five minutes after BLOUNT informed GRISBY about the traffic stop, and 1:52 a.m. on July 24, 2010, phone records show that the phone being used by GRISBY had six contacts with the phone being used by CRUSOE, with five of the six contacts ranging from approximately 2 ½ minutes to almost 10 minutes.

76. Approximately 45 minutes after the traffic stop, the black GMC Denali was transported to the Indiana State Police Lowell Post Garage for safety purposes. At this location, the ISP K-9 officer and "Blackie" again conducted a sniff of the vehicle. According to the ISP K-9 officer, "Blackie" gave a positive indication for the presence of a narcotics odor in the area between the captains' seats in the middle row of the vehicle. A further inspection on July 24, 2010 resulted in the discovery of a separate secret compartment located in the interior roof of the vehicle, which contained two packages wrapped in black tape. Law enforcement subsequently submitted the packages to the DEA laboratory to be tested by an expert in forensic chemistry. The substance in the packages tested positive for 428.4 grams of heroin.

77. On July 24, 2010, at approximately 5:13 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #10827) to GRISBY. During this call, BLOUNT asked, "Yeah, what he [Owner A] say they [police in Indiana] say to him?" GRISBY stated, "They [police] won't answer him. When he [Owner A] called, he said they ain't answer him." GRISBY subsequently stated, "Yeah, whatever, he [Owner A] . . . naw, he talking 'bout . . . so, he just waiting to talk to them . . ." BLOUNT and GRISBY then discussed whether the police had really found the heroin in the black GMC Denali, and BLOUNT assured GRISBY, "You know me. When I be putting it up there [secreting the heroin inside the vehicle], I push it up [BLOUNT places the heroin deep inside the natural void of the vehicle]!"

78. On July 27, 2010, at approximately 2:22 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #12857) to GRISBY. During this call, BLOUNT stated, "I just got through talking to my lawyer and shit, you know what I'm saying?" GRISBY stated, "I never got in touch with my lawyer. What, what he [BLOUNT's lawyer] say?" BLOUNT responded, "He

[BLOUNT's lawyer] say, um, 'Well, it [the Denali] ain't in your [BLOUNT's] name, we [BLOUNT and GRISBY] need to get with your man [Owner A]. . . how did he buy the car?. You know what I'm saying? How did he [Owner A] buy the car [the GMC Denali]; was it brand new when he bought it?" GRISBY responded, "Yep, he [Owner A] bought that brand new. That came, he was the only person ever had it." BLOUNT continued, "Right, so. . . he [Owner A] go to auctions, he got a dealer license, and all this type of stuff." GRISBY stated, "Yeah, he [Owner A] got that [a dealership license], but that car [the GMC Denali], you know he, he, he ain't, he got that from GMC his self. But uh, he bought that [GMC Denali] brand new, like nobody else ain't never owned . . . But that's the, that was the only fishy thing, like, that was the only thing though, that was the only part." Later in the conversation, GRISBY stated, "But most likely, we [GRISBY and Owner A] gonna just say we let Omeshia [CRUSOE], you know, Omeshia keep the truck [the GMC Denali]. Like, she had the truck for a few months."

79. On July 27, 2010, at approximately 9:53 a.m., BLOUNT, using Target Phone 1, received an incoming call (Call #12663) from GRISBY. During this call:

(a) GRISBY told BLOUNT, "He [Owner A, the registered owner] talked to them, but he said he would rather have his lawyer talk to them [police]. Those mother fuckers ask too many questions. Now, he talking about. He'll say the truck his, but he like shit. He gotta indicate somebody at least. Who we gonna say used your truck? He was like you know he was gonna say he let a friend up there [Chicago] used his truck, use his truck for the last four or five months or whatever. But, you know, he don't know no names or nothing, but I gave him Omeshia's [CRUSOE] name. I told him that. Tell him know Omeshia [CRUSOE], I told him to say that shit. Huh, a friend or niece or something, but he gotta put a story together." BLOUNT asked, "What did he say they

[police] were sayin?" GRISBY responded, "They [police] just keep asking questions like, who did it, who put, who put, who put the box [concealed compartment] in there, why, who had the truck and this and that. You know, and they telling him [Owner A], 'well, the law is, you can't have that [concealed compartment] and you can't have this truck back and this and that.' So, he [Owner A] just said 'fuck it.' We could talk to get an attorney, but he [Owner A] asked me, would you and me pay for it all this and I'm like, shit, I'm pretty sure that we will, and he said that's the only way he thinks it will be a speedy process getting that truck [black GMC Denali] back is with a lawyer."

(b) Later in the call, GRISBY stated, "He [Owner A] like, you know we just gotta go to come up with a story, like who, who, who did he let use his truck up there [Chicago], you know. That's what he want to know, so he can tell them like, so." BLOUNT remarked, "Right." GRISBY continued, "But I, I can't tell him [Owner A] there's shit [heroin] in there [black GMC Denali], cause he, he man, that mother fucker will go left on us [GRISBY was concerned that, if Owner A found out that his vehicle was used for transporting heroin, Owner A might talk to the police]." BLOUNT responded, "Even if they [police] find that [heroin], they just trippin' about that stash spot [concealed compartment]." Subsequently, GRISBY stated, "And, and you talk to Omeshia [CRUSOE] and let her know though, like, that we gonna say that she had that truck for the last four or five months and you know, her baby daddy locked up and just let her know what's gonna be said [GRISBY wanted BLOUNT to provide CRUSOE with details of a fictional story they were going to tell the police about the black GMC Denali]."

(c) Later in the call, GRISBY stated, "I said, if we could come across anything [more heroin], we could send the money or whatever and we would pay that 110 [\$110 per gram of heroin], you know?" BLOUNT replied, "Like, what we trying to do? We still could have went to

Amigo [Gambino] and just re-upped [received more heroin from Gambino], you see what I'm saying?" GRISBY replied, "Yeah. Yep." BLOUNT advised, "We still could have re-upped [received more heroin]. That mother fucker's gonna lose out [BLOUNT was concerned about losing money after the seizure of heroin]." GRISBY replied, "No, I don't think we're gonna lose out. Hell no. They [police] ain't found that shit [heroin], so we can't lose out [GRISBY reassured BLOUNT that the police would not find the heroin]. If, I feel like this, if anything, if it ever came down to it, like anything came down, well, that's his truck, even if they tried to keep it. I don't think they [police] can do shit."¹³

4. The BLOUNT-BRIDGES DTO Purchases 600 Grams of Heroin from the FLORES DTO, brokered by Gambino and ACEVEDO-MARCHAN, on October 3, 2010

80. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on October 3, 2010, the BLOUNT-BRIDGES DTO purchased 600 grams of heroin from the FLORES DTO, in a deal brokered by Gambino and ACEVEDO-MARCHAN. On October 2, 2010, BRIDGES met with Gambino, ACEVEDO-MARCHAN and FLORES at the residence of ACEVEDO-MARCHAN, to pick up the heroin, but the FLORES DTO declined to break up a whole kilogram of heroin to provide the BLOUNT DTO with 600 grams. On

¹³GRISBY is associated with other cars driven by BLOUNT and BRIDGES. For instance, on August 10, 2010, BRIDGES was observed driving a red Jeep Wrangler, previously owned by GRISBY and transferred in quick succession to a female associated with Grisby's address, and then a male associated with one of BRIDGES's addresses. On September 8, 2010 and November 6, 2010, BLOUNT was observed driving a Chevrolet Tahoe, previously owned by OWNER A, and then transferred from OWNER A to a female in Cincinnati at whose residence GRISBY was observed on August 7, 2010. The female then transferred the Chevrolet Tahoe to an individual associated with BLOUNT: On July 30, 2011, after the Chevrolet Tahoe had been taken to a tow yard, the user of a phone registered to the same name and address as the registered owner of the Chevrolet Tahoe was intercepted over Target Phone 3, (Call ##15637, 15716 & 15717), during which conversations they discussed the Chevrolet Tahoe and BLOUNT told the user of that phone that BLOUNT might need him to get the Chevrolet Tahoe out of the pound, likely because the registered owner would have to retrieve the vehicle.

October 3, 2010, the FLORES DTO agreed to provide the BLOUNT DTO with the 600 grams of heroin, and BRIDGES, FLORES and Gambino returned to ACEVEDO-MARCHAN's residence, where BRIDGES picked up the 600 grams of heroin.

81. On September 27, 2010, at 12:16 p.m., BLOUNT, using Target Phone 3, called Gambino, using Target Phone 2 (Call #5269). During this conversation, BLOUNT stated, "Tell the man a whole and two-fifty." Gambino asked BLOUNT, "What?" and BLOUNT repeated, "I want a whole one, and then two hundred and fifty more."

82. Approximately a minute after his conversation with BLOUNT, as described in the preceding paragraph, Gambino, using Target Phone 2, called Fernando Acevedo-Fitz (hereinafter "Acevedo-Fitz")¹⁴ (Call #5270), and told Acevedo-Fitz that "He says he wants a whole one and two, five, zero, loose." Acevedo-Fitz responded, "No, tell him that there is only what I told you. . .tell him that's all I have, okay?" However, following law enforcement's seizure of drug proceeds

¹⁴Acevedo-Fitz has been charged with narcotics violations in a separate federal criminal complaint, filed on the same day as this complaint.

connected with Acevedo-Fitz on September 29, 2010,¹⁵ Gambino reached out to the FLORES DTO to provide the heroin to BLOUNT, as set forth in the following paragraphs.

83. On September 30, 2010, at approximately 7:08 p.m., BLOUNT, using Target Phone 3, received an incoming call (Call #13757) from Gambino, who was using Target Phone 2. During this call, BLOUNT stated, "Now, why didn't you call the other dude [ACEVEDO-MARCHAN] man, god damn Charlie, from this money, man see Charlie, you be playing man?" Gambino responded, "Alright, Charlie, let me call the other guy [ACEVEDO-MARCHAN]. I'll call you back." BLOUNT replied, "Call the other guy [ACEVEDO-MARCHAN], remember the one we met down the street from the old man [at ACEVEDO-MARCHAN's residence, not far from the residence of ACEVEDO-FITZ]." Gambino remarked, "Right, right, right." BLOUNT repeated, "Call him [ACEVEDO-MARCHAN] and see if he doing something [distributing heroin]." Gambino advised, "Alright, cool, I'll call you back."

84. On October 1, 2010, at approximately 3:16 p.m., Gambino used Target Phone 2 to place an outgoing call (Call #5846) to BLOUNT, who was using Target Phone 3. During this call,

¹⁵On September 29, 2010, at approximately 1:33 p.m., surveillance at the residence of Acevedo-Fitz, 2049 North Kostner, Chicago, Illinois ("the 2049 North Kostner Residence") observed Acevedo-Fitz and Individual D exit the rear yard of the residence, and walk in opposite directions. At approximately 2:50 p.m., surveillance observed Individual D walk toward and into the rear yard of the 2049 North Kostner Residence, carrying a blue satchel bag over his shoulder, which appeared to be empty. At approximately 3:30 p.m., surveillance observed Individual D exit the rear yard of the 2049 North Kostner Residence with the same blue satchel bag, which now appeared to be full. A few moments later, Individual D walked past an officer who noticed that the bag appeared to be heavy. CPD officers in uniform approached Individual D and conducted a field interview, during which Individual D advised the officers that he had a lot of money in the bag, but Individual D could not explain where he obtained the substantial amount of cash in his possession. One of the officers viewed the contents of the bag, and observed that the bag was filled with money. Subsequently, a K-9 dog trained to detect narcotics gave a positive alert on the bag for the presence of narcotics. Based upon the information obtained from intercepted calls, previous surveillance, the positive alert by the K-9 and Individual D's statements, law enforcement officers seized the money, which amounted to \$122,120 in suspected narcotics proceeds. Individual D also signed a Disclaimer of Ownership for the money.

Gambino stated, "Hey, I talked to the other guy [ACEVEDO-MARCHAN], you want to do this [heroin transaction] with the other guy [ACEVEDO-MARCHAN]?" BLOUNT replied, "Give me about an hour. Then I'm gonna hit you and we talk about . . ."

85. On October 1, 2010, telephone calls intercepted on Target Phone 2 (Call #5852, #5862), and surveillance showed that BLOUNT, BRIDGES and Gambino met with ACEVEDO-MARCHAN¹⁶ at ACEVEDO-MARCHAN's residence at **the 1920 North Karlov Residence**". Subsequent intercepted telephone calls indicated that the heroin transaction did not take place on that day, but continued to be negotiated.

86. On October 2, 2010, at approximately 3:05 p.m., Gambino, using Target Phone 2, placed an outgoing call (Call #5954) to ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, Gambino stated, "Hey, he [BRIDGES] wants 600 [600 grams of heroin], dude."

¹⁶The identification of ACEVEDO-MARCHAN and his voice in this Affidavit is based in part on the following: During multiple intercepted calls over Target Phone 2, including Call #5832, Gambino referred to the user of Target Phone 4 as "Fernando." On October 1, 2010, intercepted calls between Target Phone 2 and Target Phone 4 indicated that the user of Target Phone 4 was going to meet with Gambino at Gambino's residence. After viewing a known booking photograph of ACEVEDO-MARCHAN from a December 2009 arrest, law enforcement officers positively identified ACEVEDO-MARCHAN as one of the individuals meeting with Gambino at his residence. After this meeting, law enforcement officers followed ACEVEDO-MARCHAN, who was in a grey Nissan Maxima, back to 1920 North Karlov Avenue, Chicago, Illinois. ACEVEDO-MARCHAN has an Illinois Identification Card issued to him at 1920 North Karlov Avenue. Furthermore, through surveillance conducted from October 1 to October 3, 2010, law enforcement officers have photographs and video surveillance footage of ACEVEDO-MARCHAN at 1920 North Karlov Avenue around the time of suspected heroin transactions. After intercepted calls over Target Phone 4 and, subsequently, Target Phone 6, arranging narcotics transactions, surveillance repeatedly observed ACEVEDO-MARCHAN at 1920 North Karlov Avenue, or other pre-arranged meet locations, meeting with other parties to the narcotics transactions. During certain intercepted calls, multiple individuals, including BLOUNT and BRIDGES, have referred to the user of Target Phone 6 as "Fernando." Furthermore, Spanish linguists contracted by DEA identified ACEVEDO-MARCHAN as the user of Target Phone 6 and Target Phone 15 through voice comparisons conducted with intercepted calls involving ACEVEDO-MARCHAN's use of Target Phone 4, concluding that the voices are the same. In the summaries of the intercepted calls in this Affidavit in which ACEVEDO-MARCHAN is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to ACEVEDO-MARCHAN in each of these summaries is the same.

ACEVEDO-MARCHAN asked, "600 [600 grams of heroin]? . . . I thought he [BRIDGES] wanted the whole one [one kilogram of heroin]?" Gambino stated, "He [BRIDGES] called me right now and said he wanted a whole one [one kilogram of heroin] plus 600 [600 grams of heroin] more." ACEVEDO-MARCHAN asked, "So, what's the total then?" Gambino advised, "We'll talk over there."

87. On October 2, 2010, telephone calls intercepted over Target Phone 2 (Call #5949; Call #5953) indicated that BRIDGES and Gambino planned to meet again at the residence of ACEVEDO-MARCHAN.

88. At approximately 3:40 p.m., surveillance observed FLORES, carrying a brown paper bag, exit a grey Nissan Maxima and enter **the 1920 North Karlov Residence**. At approximately 3:55 p.m., surveillance observed FLORES standing on the porch of **the 1920 North Karlov Residence**.

89. At approximately 4:09 p.m., surveillance observed BRIDGES and Gambino enter **the 1920 North Karlov Residence** through the rear. Beginning at approximately 4:23 p.m., surveillance observed Gambino exit the rear gate in the backyard of **the 1920 North Karlov Residence**, and depart the area in the green Dodge Caravan, and then observed BRIDGES depart the area in the **Cadillac Escalade**.

90. On October 2, 2010, at approximately 4:26 p.m., Gambino, using Target Phone 2, received an incoming call (Call #5964) from BLOUNT, who was using Target Phone 3. During this call, BLOUNT stated, "My uncle [BRIDGES] called me and told me you all weren't serving him [giving heroin to BRIDGES]." Gambino responded, "Dude [ACEVEDO-MARCHAN and FLORES] didn't want to cut it [break the heroin down into smaller quantities], man." BLOUNT

asked, "Oh, uh, that's what it was?" Gambino confirmed, "Yeah. That's what it was, man. So, I guess we got to wait until tomorrow then."

91. On October 3, 2010, at approximately 7:40 a.m., Gambino, using Target Phone 2, placed an outgoing call (Call #5993) to ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, Gambino asked, "You are ready, right?" ACEVEDO-MARCHAN advised, "I have the whole one [one kilogram of heroin] here, man . . . we don't have to go anywhere for that [heroin]. It [heroin transaction] can be done here [ACEVEDO-MARCHAN's residence] with me."

92. On October 3, 2010, at approximately 7:41 a.m., Gambino, using Target Phone 2, placed an outgoing call (Call #5994) to BRIDGES. During this call, Gambino asked, "Hey, you want the whole one [one kilogram of heroin], right?" BRIDGES replied, "No, I want the six [600 grams of heroin]." Gambino asked, "Huh?" BRIDGES advised, "The 600 [600 grams of heroin], man." Gambino responded, "Oh, okay. I'll call you back."

93. On October 3, 2010, at approximately 7:43 a.m., Gambino, using Target Phone 2, received an incoming call (Call #5997) from ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, Gambino stated, "The guy [BRIDGES] is going to want 600 [600 grams of heroin]. Okay, man?" Later in the call, ACEVEDO-MARCHAN stated "Fucking shit. Let me call this guy [FLORES] to see what he tells me."

94. On October 3, 2010, at approximately 8:02 a.m., Gambino, using Target Phone 2, received an incoming call (Call #5998) from ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, ACEVEDO-MARCHAN stated, "Listen, ask the guy [BRIDGES] with the six [600 grams of heroin] that if he'll come for the rest [400 grams of heroin] later on, we'll [ACEVEDO-MARCHAN and his source of supply] hold on to it for him." Gambino replied, "Okay."

Let me tell him." ACEVEDO-MARCHAN explained, "Tell him [BRIDGES] if not, we won't cut it [break the heroin down into smaller quantities]."

95. On October 3, 2010, at approximately 8:03 a.m., Gambino, using Target Phone 2, placed an outgoing call (Call #6000) to BRIDGES. During this call, Gambino stated, "Hey, uh, he [ACEVEDO-MARCHAN] said if you're gonna come back for the rest [400 grams of heroin]." BRIDGES confirmed, that he would, "in about two or three days."

96. On October 3, 2010, at approximately 8:03 a.m., Gambino, using Target Phone 2, placed an outgoing call (Call #6001) to ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, Gambino stated, "He [BRIDGES] said he would come back for the rest [400 grams of heroin] in about two or three days." ACEVEDO-MARCHAN replied, "Okay. Have him head this way then." A minute later, Gambino, using Target Phone 2, placed an outgoing call (Call #6002) to BRIDGES, and told BRIDGES, "Let's do this [heroin transaction]. I'll meet you at the same place [**the 1920 North Karlov Residence**]." BRIDGES stated that he was on his way.

97. At approximately 9:02 a.m., surveillance observed Gambino, driving his green Dodge Caravan, park in the church parking lot south of **the 1920 North Karlov Residence**. On October 3, 2010, at approximately 9:03 a.m., Gambino, using Target Phone 2, placed an outgoing call (Call #6016) to ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, Gambino told ACEVEDO-MARCHAN, "Okay, I'm on my way up."

98. At approximately 9:07 a.m., surveillance observed BRIDGES, driving the **Cadillac Escalade**, park near ACEVEDO-MARCHAN's residence. Approximately one minute later, Gambino, using Target Phone 2, received an incoming call (Call #6017) from BRIDGES, who stated, "Yeah, I'm here Charlie." Gambino replied, "Come inside, man." Moments later,

surveillance observed BRIDGES relocate his **Cadillac Escalade** to the backyard behind **the 1920 North Karlov Residence**, and then observed BRIDGES walk up the rear steps leading to **the 1920 North Karlov Residence**.

99. Beginning at approximately 10:14 a.m., surveillance observed the following: (a) FLORES's grey Nissan Maxima park in the rear of **the 1920 North Karlov Residence**; (b) moments later, FLORES and an unidentified female exited the grey Nissan Maxima, and entered **the 1920 North Karlov Residence** via the rear staircase; (c) at approximately 10:51 a.m., BLOUNT, driving his white Lincoln and being followed by a silver Dodge Stratus, entered the vicinity of **the 1920 North Karlov Residence**, and both vehicles parked behind **the 1920 North Karlov Residence**; (d) shortly thereafter, Gambino and BRIDGES exited the rear of the residence, and BRIDGES, in the **Cadillac Escalade**, BLOUNT, in the white Lincoln, and an unidentified black male driving the silver Dodge Stratus, departed the area behind **the 1920 North Karlov Residence**; (e) the grey Nissan Maxima departed the area of ACEVEDO-MARCHAN's residence and drove to FLORES' residence at 2059 North Lockwood Avenue, Chicago, Illinois, where the vehicle entered the garage behind the residence. Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that, at this time, BRIDGES picked up the 600 grams of heroin from FLORES and ACEVEDO-MARCHAN at **the 1920 North Karlov Residence**, while BLOUNT and another individual acted as security for BRIDGES.

100. On October 3, 2010, at approximately 2:50 p.m., Gambino, using Target Phone 2, received an incoming call (Call #6046) from ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, ACEVEDO-MARCHAN asked, "Hey, have the black guys [BLOUNT and BRIDGES] called you . . . to let you know if it [heroin] was good [quality] or not?" Gambino

responded, "They haven't called, but I'll let you know once they do." ACEVEDO-MARCHAN asked, "If it's [heroin] good or not so I won't waste the money [to purchase more heroin], understand?" Gambino replied, "They haven't called me dude. I'll call you once they [BRIDGES and BLOUNT] call me." ACEVEDO-MARCHAN stated, "They fucking left since 9:00 or 10:00 and it's 3:00 already." Gambino responded, "Let me call them and I'll call you back."

101. On October 3, 2010, at approximately 5:07 p.m., Gambino, using Target Phone 2, received an incoming call (Call #6056) from ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, ACEVEDO-MARCHAN asked again if BRIDGES and BLOUNT had called yet, but Gambino said that they had not. Gambino assured ACEVEDO-MARCHAN, "Yes, that means that everything [heroin] is okay [good quality]." ACEVEDO-MARCHAN stated, "Okay, alright. Call me for the rest of it [remaining 400 grams of heroin]."

102. On October 4, 2010, at approximately 9:48 a.m., BLOUNT, using Target Phone 3, placed an outgoing call (Call #16127) to BRIDGES. During this call, BLOUNT asked, "Yeah, is that shit [heroin] grey, grey [color of the heroin] or what?" BRIDGES replied, "You know, when you, uh, you opened it [heroin packaging] up in the middle, it was kind of greyish-beige [color of the heroin]." Later in the call, BRIDGES stated, "I gave Jim some for Paul. Jim gave him a 12 [undetermined quantity]. Connor said that shit [heroin] is ridiculous [the quality is very good]. I don't know what this one [heroin] got on it [stamp or emblem on the heroin]. . . I think it's a shark [BRIDGES advised that the heroin contained a stamp or emblem of a shark]."¹⁷

¹⁷On October 8, 2010, law enforcement seized 496 grams of heroin delivered by BLOUNT and BRIDGES, in packaging which bore the shark emblem. Pursuant to interception of telephone conversations over Target Phone 3, law enforcement learned that BLOUNT and BRIDGES planned to deliver heroin to Individual E, a narcotics associate in Cincinnati, Ohio. On October 7, 2010, surveillance agents followed BLOUNT, in a white Chevrolet Impala (hereinafter "**Chevrolet Impala**"), with BRIDGES in his **Cadillac Escalade**, drive in close proximity from the Chicago area to Individual E's

5. The BLOUNT BRIDGES DTO Purchases 800 Grams of Heroin From the FLORES DTO on October 20, 2010

103. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on October 20, 2010, the BLOUNT-BRIDGES DTO purchased 800 grams of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. BRIDGES went to the residence of ACEVEDO-MARCHAN, where he met with FLORES and picked up the heroin, while BLOUNT and CHARLES THOMAS conducted surveillance outside the residence.

104. On October 20, 2010, at approximately 5:10 p.m., BLOUNT, using Target Phone 3, placed an outgoing call (Call #26367) to ACEVEDO-MARCHAN, who was using Target Phone 4. During the call, ACEVEDO-MARCHAN asked, "Yeah, how much [heroin] you need?" BLOUNT responded, "Like 800 [grams of heroin]." ACEVEDO-MARCHAN told BLOUNT that he would call him back.

105. On October 20, 2010, at approximately 5:21 p.m., BLOUNT, using Target Phone 3, received an incoming call (Call #26370) from ACEVEDO-MARCHAN, who was using Target Phone 4. ACEVEDO-MARCHAN asked BLOUNT if he wanted to do the deal the next day because

residence in Cincinnati. On October 8, 2010, beginning at approximately 2:23 a.m., surveillance observed BLOUNT and BRIDGES meet with a male, likely Individual E, in front of the residence, where I believe they delivered the heroin to Individual E, and then BLOUNT and BRIDGES departed the area. Less than an hour later, at approximately 3:18 a.m., Individual F drove up to Individual E's residence, where he retrieved a package from the front porch area, and then Individual F drove away. As Individual F departed, he committed a traffic violation, resulting in local police signaling for Individual F to pull over. Individual F attempted to flee and, during a chase by police, Individual F flung a package out the window. The package was retrieved by law enforcement and submitted to the Hamilton County Crime Laboratory in Cincinnati, where it was analyzed by an expert in forensic chemistry, and it was determined to be 496 grams of mixtures containing heroin. The package bore an emblem of a shark, like the emblem described by BRIDGES on the heroin obtained from the FLORES DTO on October 3, 2011.

"I [ACEVEDO-MARCHAN] only got 3 [300 grams of heroin] and the rest tomorrow morning. I got it [the heroin] for you tomorrow morning. You want to do everything [the 800 grams of heroin] tomorrow?" BLOUNT responded, "I'm a have to grab the 3 [300 grams of heroin] then." BLOUNT and ACEVEDO-MARCHAN agreed to meet around 7 o'clock.

106. On October 20, 2010, at approximately 5:35 p.m., BLOUNT, using Target Phone 3, received an incoming call (Call #26374) from ACEVEDO-MARCHAN, who was using Target Phone 4. ACEVEDO-MARCHAN told BLOUNT, "I got the 8 [800 grams of heroin] that you want." BLOUNT responded, "Okay, you got everything [800 grams of heroin]?" ACEVEDO-MARCHAN replied, "Yeah, but promise me you gonna come get the rest [the remaining 200 grams of heroin] in 2 or 3 days. I don't want to leave that shit [heroin] up [at ACEVEDO-MARCHAN's residence]." BLOUNT agreed.

107. On October 20, 2010, beginning at approximately 7:30 p.m., surveillance observed BLOUNT, in a silver Dodge Caravan, circling the area of **the 1920 North Karlov Residence**; BRIDGES, driving the **Cadillac Escalade**, arriving shortly thereafter and parking in the rear yard of **the 1920 North Karlov Residence**; and CHARLES THOMAS, in a white four-door Lincoln, circling the area of **the 1920 North Karlov Residence**.¹⁸

¹⁸The identification of CHARLES THOMAS and his voice in this Affidavit is based in part on the following: During intercepted calls over Target Phone 1, BLOUNT has referred to the user of telephone number (773) 678-6280 as "Charles" and "Big C." DEA has received subscriber information for telephone number (773) 678-6280, which is subscribed to Walter Davis, 324 West 47th Street, Chicago, Illinois. According to a criminal database inquiry, Walter Davis is one of many aliases utilized by CHARLES THOMAS. CHARLES THOMAS has a current Illinois driver's license issued at 324 West 47th Street, Chicago, Illinois. Law enforcement officers conducting surveillance of BLOUNT and BRIDGES during narcotics transactions and otherwise, have observed in the vicinity a blue Dodge Charger bearing Illinois license plate 58508FF, which is registered to Charles THOMAS, Jr., 2446 East 96th Street, Chicago, Illinois, and have, at times, seen CHARLES THOMAS in the blue Dodge Charger. Lastly, law enforcement officers have compared the Illinois driver's license photograph of CHARLES THOMAS to the surveillance photos of CHARLES THOMAS, and identified the person depicted in the

108. At approximately 7:55 p.m., FLORES arrived, driving a grey Nissan Maxima, and parked in the rear yard of **the 1920 North Karlov Residence**. FLORES then entered the residence.

109. Beginning at approximately 8:15 p.m., surveillance observed the following: (a) BRIDGES and FLORES exited the residence at **the 1920 North Karlov Residence**, entered their vehicles and departed the area; (b) BLOUNT and CHARLES THOMAS followed BRIDGES in tandem out of the area; (c) all three cars pulled up together on the 7900 block of South Carpenter Street in Chicago. Surveillance also followed FLORES back to 2059 N. Lockwood, where he entered the residence.

110. Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that on October 20, 2010, FLORES brought the heroin to ACEVEDO-MARCHAN'S residence. BRIDGES picked up the heroin from FLORES and ACEVEDO-MARCHAN, while BLOUNT and CHARLES THOMAS waited outside to watch for law enforcement. BLOUNT and CHARLES THOMAS then escorted BRIDGES back to the south side of Chicago.

6. The BLOUNT-BRIDGES DTO Purchases A Kilogram of Heroin from the FLORES DTO on October 25, 2010

111. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on October 25, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. BRIDGES, with BLOUNT and CHARLES THOMAS acting as security to detect law enforcement

surveillance photos as CHARLES THOMAS. In the summaries of the intercepted calls in this Affidavit in which CHARLES THOMAS is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to CHARLES THOMAS in each of these summaries is the same.

presence, went to ACEVEDO-MARCHAN's residence, where BRIDGES met with FLORES and picked up the kilogram of heroin.

112. On October 24, 2010, at approximately 8:25 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #3118) from BLOUNT, who was using Target Phone 3. During this call, ACEVEDO-MARCHAN reminded BLOUNT, "You know you owe me [BLOUNT owed ACEVEDO-MARCHAN money from the 800 gram heroin transaction that occurred October 20, 2010, described in the preceding section], right?" BLOUNT replied, "Yeah, yeah. I've been stuck doing some other shit, man. I've been trying to link up, you know what I'm saying?" Shortly thereafter, ACEVEDO-MARCHAN asked, "Okay, what you need [how much heroin did BLOUNT want]?" BLOUNT stated, "Shit, fuck, I'm a be all the way [BLOUNT wanted one kilogram of heroin]." ACEVEDO-MARCHAN asked for clarification, and BLOUNT reiterated, "I'm a be all the way [one kilogram of heroin]."

113. On October 24, 2010, at approximately 9:16 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #3145) to BLOUNT, who was using Target Phone 3. BLOUNT told ACEVEDO-MARCHAN, "I'm going all the way [to purchase one kilogram of heroin]." ACEVEDO-MARCHAN responded, "So, what [amount of heroin] are you going to need for tomorrow?" BLOUNT responded, "Shit, give me the whole one [one kilogram of heroin]. The whole thing [one kilogram of heroin]." They agreed to meet the following day. The next day, ACEVEDO-MARCHAN, using Target Phone 4, contacted FLORES (Call #3920), and stated, "He's [BLOUNT] coming for a whole one [one kilogram of heroin]."

114. On October 25, 2010, at approximately 5:30 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #4051) from FLORES. During this call, FLORES

stated that, "What happened was . . . I was with all of my guys [sources of supply] and only one of them gave me a response back of yes, but this guy [heroin source of supply] wants it [heroin] really high [price]. He doesn't want to lower it [the price of the heroin]." FLORES then stated, "The things is that . . . I don't know if you . . . you and I are just going to make a little bit [FLORES and ACEVEDO-MARCHAN would only make a minimal profit from the sale of heroin to BLOUNT]. If you want, I can give you one [\$1,000] and . . . and another one [\$1,000] for myself so the guy can be happy. What do you think?" ACEVEDO-MARCHAN stated, "Okay. Let me call you right back. I'm going to talk to him [BLOUNT]. . . Either way, if not today, tomorrow, right?" FLORES replied, "But what if they [source of supply] get rid of that [heroin]? Well, I don't know. If not, early tomorrow then."

115. On October 25, 2010, at approximately 5:49 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #4067) to BLOUNT. During this call, BLOUNT stated, "Fernando, my bad. I'm counting this money [the purchase money for the heroin] right now. You know what I'm saying? I'm gonna hit you right back in about 30 minutes and let you know. You know what I'm saying?" ACEVEDO-MARCHAN asked, "Okay, well, you want to do it [heroin transaction] tomorrow?" BLOUNT stated, "No. Today."

116. Approximately a minute later, ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #4071) from FLORES. FLORES asked ACEVEDO-MARCHAN what was going on and ACEVEDO-MARCHAN responded, "He [BLOUNT] said he wants it [heroin] for today. He is counting the money." FLORES told ACEVEDO-MARCHAN "I can go over there [ACEVEDO-MARCHAN's residence] right now. What time is he [BLOUNT] going to come?" ACEVEDO-MARCHAN responded, "He [BLOUNT] is counting right now." FLORES

replied, "This takes longer [to prepare the heroin] over here [FLORES residence]. That's why I told you what's up. If we can do it [the transaction], good. If not, then oh well."

ACEVEDO-MARCHAN replied, "Bring me some of that [heroin] then." FLORES replied, "I can't."

117. On October 25, 2010, at approximately 6:36 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #4095) to BLOUNT, who was using Target Phone 3. During this call, BLOUNT stated, "All the way [one kilogram of heroin], you know what I'm saying? The last one [kilogram of heroin] he [FLORES] just gave me . . . That half thing in his field [referring to the shark emblem on heroin previously supplied by FLORES, as described above in n. 16 and ¶102] . . ." BLOUNT instructed ACEVEDO-MARCHAN, " Tell him [FLORES] to make two of them. . . two of them 500 like that [BLOUNT wanted two separate 500 gram quantities of heroin, totaling one kilogram]." ACEVEDO-MARCHAN asked, "Oh, so what you want me to do then?" BLOUNT responded, "I want a whole one [one kilogram of heroin] but I want two 500's like he [FLORES] gave me that with that shark [shark imprint/emblem on heroin previously supplied by FLORES] on it."

118. On October 25, 2010, at approximately 6:37 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #4096) to FLORES. During the call, ACEVEDO-MARCHAN asked FLORES, "Hey, what kind [quality] is that one [heroin]?" FLORES told ACEVEDO-MARCHAN, "It's with another guy [supplier], but tell your guy [BLOUNT] to wait for the same guy [supplier] as always, for tomorrow or the day after." ACEVEDO-MARCHAN replied, "No, he [BLOUNT] wants it right now. He [BLOUNT] wanted the same one that my uncle [ACEVEDO-FITZ] had, the brown one [heroin]." FLORES responded, "No, that shit [heroin] was garbage. I got a lot of complaints here. That shit [heroin] was garbage." ACEVEDO-MARCHAN

said, "He [BLOUNT] said the one [heroin] with the scorpion [symbol used by one of FLORES' drug suppliers to identify the product with customers]." FLORES responded, "No, that shit [heroin] was garbage. Tell him [BLOUNT] tomorrow, man. Okay?"

119. On October 25, 2010, at approximately 7:40 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #4161) to FLORES. During this call, ACEVEDO-MARCHAN told FLORES, "That guy [BLOUNT] is set on getting it [heroin]. He [BLOUNT] wants it [heroin] and he [BLOUNT] is here with me." Later in the call, ACEVEDO-MARCHAN reiterated that BLOUNT wanted the heroin that night. FLORES replied, "Okay, Fernando, but there isn't any [heroin] until tomorrow. Not right now." Later in the call, ACEVEDO-MARCHAN asked, "You can't do it early, man?" FLORES responded, "No, it's because it's [heroin] not here [at FLORES' residence]. That's [heroin] not here. If I had it [heroin] here, it [heroin transaction] would have been done already." FLORES then asked when BLOUNT would arrive, and ACEVEDO-MARCHAN responded, "He [BLOUNT] already got here. He's here." FLORES replied, "Fucking shit! Wait. Let me make a call [to get the heroin] then."

120. On October 25, 2010, at approximately 7:44 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #4162) from BLOUNT, who was using Target Phone 3. During this call, BLOUNT reiterated that he wanted the same heroin that he had received during the prior deal: "Yeah, I'm talking about . . . not the 300 [300 grams of heroin]. The 500 [500 grams of heroin] one. You had that 500 [500 grams of heroin] one. Tell him [FLORES] to give me two of them [two 500 gram packages of heroin]." Later in the call, ACEVEDO-MARCHAN asked, "I might do it [heroin transaction] right now like in an hour. You think you could do it [heroin transaction]?" BLOUNT stated, "Man, I'm waiting on you. If we could do it [heroin transaction]"

now." ACEVEDO-MARCHAN replied, "If we don't do it in an hour, cause this mother fucker [FLORES] has to work, but let me see if I can convince him [FLORES]. If not, we'll do it [heroin transaction] tomorrow morning. Okay?" BLOUNT advised, "Try to convince him, man." ACEVEDO-MARCHAN stated, "I'm going to convince him [FLORES] right now."

121. On October 25, 2010, at approximately 7:55 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #4176) from FLORES. During this call, FLORES stated that, "My guy [unknown supplier] is going to be here at 8:30 [8:30 p.m.]." ACEVEDO-MARCHAN told FLORES, "It [heroin] better be the best [quality]. Don't have them [unknown supplier] come with bullshit [poor quality heroin], alright?" FLORES later advised, "It's [heroin] going to be different than the usual [quality]. It's [heroin] going to be different but good." ACEVEDO-MARCHAN later stated, "It's probably brown [color of the heroin]." FLORES stated, "I don't know, but it's [heroin] going to be good." ACEVEDO-MARCHAN replied, "It [heroin] has to be guaranteed, man." FLORES advised, "It [heroin] is guaranteed . . . you're going to make me look bad [to the suppliers]" ACEVEDO-MARCHAN responded, "It's not the first time we do it [heroin transaction], man."

122. On October 25, 2010, at approximately 8:59 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #4232) to BLOUNT, who was using Target Phone 3. During this call, BLOUNT stated, "I'm on my way to you, Fernando." BLOUNT further stated, "I double checked the money before I come to you, shit. You always tell me I'm always short [with the money] man, and I don't know where this shit should be coming from, but, uh . . . I double checked my mess [money] out. I'm on my way." ACEVEDO-MARCHAN asked, "You got the one

[money] you owe me [from a previous heroin deal] too, right?" BLOUNT confirmed, "The 600 [\$600], yeah man."

123. On October 25, 2010, at approximately 9:00 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #4233) to FLORES. During the call, FLORES asked ACEVEDO-MARCHAN, "Can I go over there [ACEVEDO-MARCHAN's residence] now or what?" ACEVEDO-MARCHAN responded, "No. Let me count the money so he can leave. Do you want to count it [money]?" FLORES replied, "It's because I need that [money] to be right. Those are problems [when the money is miscounted], man, nothing but problems." ACEVEDO-MARCHAN told FLORES, "I'm going to count it [money] good. I'm going to tell my son to help me count it [money]. That way you can just bring it [heroin] and leave right away." FLORES instructed ACEVEDO-MARCHAN to call when BLOUNT arrived at ACEVEDO-MARCHAN's residence. Later in the call, FLORES asked, "What about the six dollars [\$600 that BLOUNT owed from a previous heroin transaction]?" ACEVEDO-MARCHAN stated, "He hasn't given them [money] to me. He [BLOUNT] said he owes me. He hasn't given them to me." FLORES explained, "I'm going to tell him [BLOUNT] to give it [the \$600] to you right now."

124. Beginning at approximately 9:57 p.m., surveillance at **the 1920 North Karlov Residence**, the residence of ACEVEDO-MARCHAN, observed the following: (a) the **Cadillac Escalade** parked behind the residence; (b) BLOUNT's grey van driving in the area of **the 1920 North Karlov Residence**; (c) BLOUNT's white Lincoln circling the area around **the 1920 North Karlov Residence**; and (d) FLORES' grey Nissan Maxima arrive and park in the area of **the 1920 North Karlov Residence**.

125. Beginning around the time that the three vehicles used by the BLOUNT-BRIDGES DTO (the **Cadillac Escalade**, the grey van and the white Lincoln) arrived in the area of **the 1920 North Karlov Residence**, BLOUNT, using Target Phone 3, had conversations with CHARLES THOMAS (Call # 29617, 29619, 29621, 29622), in which CHARLES THOMAS, acting as security for the BLOUNT-BRIDGES DTO, pointed out to BLOUNT possible law enforcement presence in the area. At one point (Call #29619), CHARLES THOMAS pointed out a suspicious looking grey Nissan Maxima, but BLOUNT told CHARLES THOMAS, “That’s cool. He cool . . . That’s who I am waiting on [BLOUNT told CHARLES THOMAS that the Nissan Maxima, driven by FLORES, was the supplier that BLOUNT was waiting to meet at **the 1920 North Karlov Residence**].” During a telephone call between BLOUNT, using Target Phone 3, and CHARLES THOMAS (Call #29621), CHARLES THOMAS told BLOUNT that he saw “the blue suits parked by the store at the corner.” BLOUNT responded, “you ain’t sitting with your lights and shit on, are you [BLOUNT did not want CHARLES THOMAS to attract the attention of law enforcement]?” CHARLES THOMAS replied that “no, the car cut off, there ain’t no lights on.”

126. Approximately a half hour after the **Cadillac Escalade** arrived at **the 1920 North Karlov Residence**, surveillance observed the **Cadillac Escalade** depart the area. At that time, BLOUNT, using Target Phone 3, made an outgoing call to CHARLES THOMAS (Call #29646) in which BLOUNT instructed CHARLES THOMAS, “Hey, get behind him [BRIDGES], let me get behind him [BRIDGES] [BLOUNT wanted to provide security for BRIDGES, who had the heroin, during the drive back to the south side of Chicago].”

127. Based on my knowledge of the investigation, the intercepted calls and surveillance, BRIDGES picked up the heroin from ACEVEDO-MARCHAN, while BLOUNT and CHARLES THOMAS looked out for law enforcement.

7. The BLOUNT-BRIDGES DTO Purchases 500 Grams of Heroin from the FLORES DTO on November 3, 2010

128. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on November 3, 2010, the BLOUNT-BRIDGES DTO purchased 500 grams of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. On November 3, 2010, BLOUNT and BRIDGES went to the residence of ACEVEDO-MARCHAN, where they met with FLORES and picked up the heroin.

129. On November 3, 2010, at approximately 4:10 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #13075) to BLOUNT, who was using Target Phone 3. During this call, BLOUNT asked, "Why don't you call old boy [FLORES], man . . . talking about 500 [500 grams of heroin]."

130. On November 3, 2010, at approximately 4:17 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #13095) to FLORES. During this call, FLORES asked, "What's up with the guy [BLOUNT]?" ACEVEDO-MARCHAN replied, "Oh, look . . . he [BLOUNT] just called me and told me that uh, he went somewhere else, but he didn't like it [ACEVEDO-MARCHAN was referring to BLOUNT being supplied with one kilogram of heroin from ANGEL HERNANDEZ on November 1, 2010, as described in ¶¶ 307-317, below] and uh, but he wants it all out. Right now, if you want, you can sell him five 'pesos' [500 grams of heroin], can you? Five 'pesos' [500 grams of heroin]? You already know how much [price] it is for five 'pesos' "

[500 grams of heroin]. There is five missing for the ten, you understand me, right?" FLORES asked, "And when is he [BLOUNT] going to come for the other [additional heroin]?" ACEVEDO-MARCHAN responded, "Well, I need to talk to him. I think in about three, four days." ACEVEDO-MARCHAN also asked, "And what kind [heroin] is it?" FLORES stated, "What he liked [the type of heroin BLOUNT liked]."

131. On November 3, 2010, at approximately 4:32 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #13111) to FLORES. During this call, ACEVEDO-MARCHAN asked, "Hey, how are we going to do things [the heroin transaction], then? Uh, we're going to your house [2059 North Lockwood Avenue] or what?" FLORES replied, "No. Over there, at the same place [**the 1920 North Karlov Residence**]." ACEVEDO-MARCHAN responded, "Over here [**the 1920 North Karlov Residence**], man? Why not over there, dude? This guy [BLOUNT] comes frequently over here [to pick-up heroin], man. Let's stop doing it [heroin transactions] here for a bit. You don't have another place?" FLORES stated, "No, dude, if not, later on . . ." ACEVEDO-MARCHAN replied, "Okay, then. Let's do it here [do the heroin transaction at **the 1920 North Karlov Residence**], then. Hey, I'm going to take one [\$1,000 as a broker's fee], alright dude?" FLORES asked, "What you mean?" ACEVEDO-MARCHAN stated, "Like always, it's [500 grams of heroin] going to be 31 [\$31,000], right? One [\$1,000] is for me, right?" FLORES replied, "But tell him [BLOUNT] to give you the six [\$600 owed by BLOUNT from a previous heroin transaction] that were left, okay? Remind him of the six [\$600]." ACEVEDO-MARCHAN agreed.

132. On November 3, 2010, at approximately 6:50 p.m., surveillance observed BRIDGES, driving the **Cadillac Escalade**, and BLOUNT, driving the silver Dodge Caravan, arrive and park

in the rear of **the 1920 North Karlov Residence**. At approximately 7:01 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #13212) from BLOUNT, who was using Target Phone 3. During this call, BLOUNT told ACEVEDO-MARCHAN that, "He's [BRIDGES] in the back." ACEVEDO-MARCHAN stated, "Okay. Open the door."

133. On November 3, 2010, at approximately 7:09 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #13215) to FLORES. During this call, ACEVEDO-MARCHAN stated, "The guys [BLOUNT and BRIDGES] are here, dude." FLORES replied, "Fucking shit, I'm going to arrive around 8:00." ACEVEDO-MARCHAN asked, "But for sure?" FLORES responded, "8:00 to 8:30, dude." ACEVEDO-MARCHAN asked, "But it's the brown kind [a type of heroin]?" FLORES confirmed, "Yeah." ACEVEDO-MARCHAN asked, "Okay, uh, okay, uh, but for sure?" FLORES stated, "Uh, let me make a call, man." Later in the call, FLORES stated, "I had it [heroin] there. I had it [heroin] there [at FLORES's residence]." ACEVEDO-MARCHAN remarked, "Uh, huh." FLORES responded, "I had it [heroin] there, dude, but you told me that, that went out [FLORES explained that the heroin he had was distributed to another customer], so I'm going to see what's up right now."

134. On November 3, 2010, at approximately 7:21 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #13226) to FLORES. During this call, ACEVEDO-MARCHAN stated, "They [BLOUNT and BRIDGES] are here with me, man." FLORES asked, "Okay, uh, he [BLOUNT] wants 500 'pesos' [500 grams of heroin], right?" ACEVEDO-MARCHAN remarked, "Yes." FLORES responded, "You're going to have to give me half an hour dude."

135. On November 3, 2010, at approximately 7:34 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #13240) to FLORES. During this call, ACEVEDO-MARCHAN asked, "Is everything [heroin] ready?" FLORES replied, "Yeah, right now." ACEVEDO-MARCHAN asked, "Do you want to count the money?" FLORES responded, "Yeah, right now."

136. On November 3, 2010, at approximately 7:54 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #13255) from FLORES. During this call, FLORES stated, "The guy [heroin source of supply] got here, okay. Give me a few." ACEVEDO-MARCHAN asked, "Where is he?" FLORES confirmed, "Here at my house [2059 North Lockwood Avenue]." ACEVEDO-MARCHAN asked, "He [source of supply] arrived already? He is there?" FLORES advised, "Yes. I'll pass by right now [deliver the heroin to **the 1920 North Karlov Residence**]. Give me a few. I'll hurry up so I can leave, okay?"

137. Approximately 10 minutes later, surveillance observed FLORES, driving the Nissan Maxima, park behind **the 1920 North Karlov Residence**. At around the same time, ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #13273) from FLORES. During this call, FLORES stated, "I'm coming already, okay?" ACEVEDO-MARCHAN asked, "Okay. You want . . . are you coming in the back or what?" FLORES stated, "Yeah, dude. Same as always [like previous heroin transactions]."

138. On November 3, 2010, at approximately 8:24 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #13275) from FLORES. During this call, FLORES stated, "Open up, dude." ACEVEDO-MARCHAN replied, "Okay. It's [back gate] open already. The guy [BLOUNT] is there." Shortly thereafter, surveillance observed BRIDGES, driving the

Cadillac Escalade, and BLOUNT, driving the silver minivan, exit the rear of **the 1920 North Karlov Residence**. Minutes later, FLORES, driving the Nissan Maxima, exited the rear of **the 1920 North Karlov Residence**, and drove to the vicinity of 2059 N. Lockwood, where he parked his car. Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that, at this time, BRIDGES and BLOUNT had picked up the heroin from ACEVEDO-MARCHAN and FLORES at **the 1920 North Karlov Residence**.

8. The BLOUNT-BRIDGES DTO Purchases A Kilogram of Heroin from the FLORES DTO on November 6, 2010

139. Based on the intercepted calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on November 6, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. FLORES delivered the kilogram to ACEVEDO-MARCHAN, and BLOUNT, BRIDGES and CHARLES THOMAS, acting as countersurveillance, drove to ACEVEDO-MARCHAN's residence, where BRIDGES met with FLORES and picked up the heroin.

140. On November 4, 2010, at approximately 3:14 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #14041) to FLORES. During this call, ACEVEDO-MARCHAN stated, "Hey, he [BLOUNT] said to change the ones [heroin] from yesterday to the other ones [different type of heroin] for that other guy [another heroin deal]." FLORES replied, "In that case, tell him [BLOUNT] to wait for me until Saturday, okay?" Later in the call, ACEVEDO-MARCHAN asked, "You have the other one [type of heroin] that we agreed on, right?" FLORES confirmed, "Yes, I do." ACEVEDO-MARCHAN asked, "So, you don't have

the other ones [heroin] right now?" FLORES responded, "No, I don't have that one [type of heroin]. I have the one from yesterday [FLORES has the same type of heroin that was distributed to BLOUNT on November 3, 2010, as described in ¶¶123-138, above], but not the other one [other type of heroin that BLOUNT wanted for the next heroin transaction]." ACEVEDO-MARCHAN asked, "Oh, so, should I tell him [BLOUNT] to wait until Saturday?" FLORES stated, "Yes, if he wants that one [other type of heroin], tell him [BLOUNT] it'll be for Saturday." ACEVEDO-MARCHAN asked, "For sure?" FLORES confirmed, "Yes."

141. On November 4, 2010, at approximately 3:16 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #14043) to FLORES. During this call, ACEVEDO-MARCHAN asked, "He's [BLOUNT] asking if you can do it [provide a specific type of heroin] for tomorrow?" FLORES asked, "Not these [type of heroin supplied to BLOUNT on November 3, 2010] anymore, right?" ACEVEDO-MARCHAN replied, "No, he [BLOUNT] said not those anymore. He wants the other stuff [heroin that was previously supplied to BLOUNT by FLORES]." FLORES responded, "Let me see if it [heroin transaction] can be done for tomorrow, okay? . . . It'll [heroin] be a sure thing for Saturday, though." ACEVEDO-MARCHAN advised, "He [BLOUNT] might change his mind and ask you for a whole one [one kilogram of heroin]. You know how crazy he is." FLORES replied, "Yeah, tell him [BLOUNT] that next time, I'm not going to do it [heroin transaction] like that. It needs to be how you said, okay?" ACEVEDO-MARCHAN asked, "So, no more halves [one-half kilogram quantities of heroin]?" FLORES responded, "No, man. It's a hassle for me. Look, these [kilograms of heroin] can be done like that because that's the way they are, but I'm not going to be able to do it with the one that is coming, man [load of heroin that is en route to FLORES] . . . That's the problem. He should wait so he can get it like that

[BLOUNT should wait until he can purchase kilogram quantities of heroin]."

ACEVEDO-MARCHAN responded, "I don't know. We'll see what he [BLOUNT] wants, but he's going to want the half [500 grams of heroin] anyway." FLORES remarked, "Okay, let me know."

142. On November 4, 2010, at approximately 7:43 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #14215) to FLORES. During this call, ACEVEDO-MARCHAN stated, "That ass [BLOUNT] already called me." FLORES asked, "What does that fucker say now?" ACEVEDO-MARCHAN replied, "That he [BLOUNT] wants it all [one kilogram of heroin]." FLORES asked, "All [one kilogram of heroin]?" ACEVEDO-MARCHAN responded, "All of it [one kilogram of heroin] for tomorrow." FLORES asked, "But not the same [heroin that FLORES sold to BLOUNT on November 3, 2010], right? The other one [other type of heroin that FLORES was expecting to soon receive]?" ACEVEDO-MARCHAN stated, "The grey [talking about the color of the heroin]." FLORES advised, "Like I tell you. I don't think I can tomorrow. I'm going to try to see what I can do, but I doubt it . . ." Later in the call, ACEVEDO-MARCHAN stated, "He [BLOUNT] said he would be back again on Sunday [ACEVEDO-MARCHAN stated that BLOUNT would pick-up heroin on this coming Sunday, in addition to the heroin BLOUNT would pick up the next day]." FLORES agreed to look into it and advise ACEVEDO-MARCHAN.

143. On November 6, 2010, at approximately 12:47 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #15990) to BLOUNT. During this call, BLOUNT asked, "Is he [FLORES] ready?" ACEVEDO-MARCHAN advised, "Yes, at 3:00 even." BLOUNT responded, "3:00. Okay, I'll be there."

144. A minute later, ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #15991) to FLORES. During this call, ACEVEDO-MARCHAN confirmed that 3:00 p.m. was fine with BLOUNT and BRIDGES for the heroin transaction.

145. On November 6, 2010, at approximately 3:00 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #16068) from BLOUNT, who was using Target Phone 3. During this call, ACEVEDO-MARCHAN stated, "I told you 3:00. Are you by my house?" BLOUNT advised, "I can meet you there [ACEVEDO-MARCHAN's house] no later than 4:00."

146. On November 6, 2010, at approximately 3:07 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #16076) to FLORES. During this call, ACEVEDO-MARCHAN stated, "He's [BLOUNT] already on his way, so I'll call you in 15 to 20 minutes." FLORES replied, "I'm already here [at ACEVEDO-MARCHAN's]. Open the door, I'm at your house." ACEVEDO-MARCHAN advised, "I'm not home, man. I came out." FLORES asked, "That's why you were fucking rushing me?" ACEVEDO-MARCHAN stated, "The guy [BLOUNT] is on his way." FLORES advised, "I can't be on the fucking street." ACEVEDO-MARCHAN replied, "My son is there. Go inside."

147. On November 6, 2010, at approximately 3:08 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #16077) to his son. During this call, ACEVEDO-MARCHAN asked, "Where are you?" His son advised, "At the house [**the 1920 North Karlov Residence**]." ACEVEDO-MARCHAN instructed, "Open up for Arturo [FLORES]. He's out on back and is upset because I'm not there. Open up and take that [kilogram of heroin] inside. The

black guy [BLOUNT] should be there in 15 minutes. I'm bring the truck. Talk to him [FLORES] or whatever and I'll be right there. Go outside [to get FLORES] fast."

148. On November 6, 2010, at approximately 4:13 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #16130) to BLOUNT, who was using Target Phone 3. During this call, BLOUNT advised, "Fernando, we [BLOUNT and BRIDGES] on the e-way [expressway], we on our way to you." ACEVEDO-MARCHAN stated, "That mother fucker [FLORES] is on my ass already." BLOUNT stated, "Man, shit, tell him to calm down."

149. On November 6, 2010, at approximately 4:41 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #16149) from FLORES. During this call, ACEVEDO-MARCHAN stated, "He's [BLOUNT] here around the corner. I'm counting the money [for the purchase of the heroin]. I'll call you when everything is ready, okay?" FLORES replied, "What do you mean? I'm the one that should be checking that [counting the money], man." ACEVEDO-MARCHAN responded, "Well, in any case, I'll help you here. He's [BLOUNT] on Armitage and Pulaski. He's on his way." FLORES stated, "Mother fucker, you are telling me that since 3:00."

150. On November 6, 2010, at approximately 4:48 p.m., BLOUNT, using Target Phone 3, placed an outgoing call (Call #37123) to ACEVEDO-MARCHAN, who was using Target Phone 4. During this call, BLOUNT stated, "Man, he's [BRIDGES] trying to pull in [behind ACEVEDO-MARCHAN's residence]." ACEVEDO-MARCHAN advised, "Okay, it's [gate] open. Tell him to pull in then."

151. On November 6, 2010, at approximately 4:57 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #16176) to FLORES. During this call, ACEVEDO-

MARCHAN asked, "Are you here yet? The gate is open, okay?" FLORES replied, "Open up. It's open?" ACEVEDO-MARCHAN asked, "Yes. It's [heroin] the grey [color], right?" FLORES confirmed, "Yeah."

152. On November 6, 2010, at approximately 5:00 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #16177) to BLOUNT, who was using Target Phone 3. During this call, BLOUNT stated, "I'm coming. What's the matter?" ACEVEDO-MARCHAN replied, "No, cause you need the rest [of the money]." BLOUNT responded, "I know. I'm close. By the time you all get through [counting the money], I'm going to be pulling up. Man, what's the matter with you?" ACEVEDO-MARCHAN asked, "How long you going to take?" BLOUNT advised, "It ain't going to take long. I'm coming, man."

153. On November 6, 2010, beginning at about the same time as the telephone call described in the preceding paragraph, surveillance observed the following: (a) a silver Dodge Caravan, driven earlier that day by BRIDGES, parked in the back of **the 1920 North Karlov Residence**; (b) BRIDGES exited the rear of **the 1920 North Karlov Residence** and leaned into the Dodge Caravan, and then reentered the residence; (c) the **Cadillac Escalade**, seen earlier that day at BLOUNT's residence, arrived and parked in the back near the Dodge Caravan; (d) FLORES, driving the Nissan Maxima, parked in the back of **the 1920 North Karlov Residence**; (e) a white Lincoln, driven earlier that day by CHARLES THOMAS, parked in front of **the 1920 North Karlov Residence**; (f) a tan Chevrolet pickup truck, seen earlier that day at BLOUNT's residence, arrive at the area of **the 1920 North Karlov Residence**, and park in the front near the white Lincoln. Soon thereafter, the Caravan, the Escalade, the Chevrolet pickup and the white Lincoln departed the area in tandem. I believe that at this time, BLOUNT and BRIDGES picked up a kilogram of heroin from

ACEVEDO-MARCHAN and FLORES, and then left with the heroin, accompanied by other members of the DTO, likely including CHARLES THOMAS, acting as security.¹⁹

154. On November 6, 2010, at approximately 8:34 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #16356) from BLOUNT. During this call, BLOUNT stated, "I wanted the shark [type of heroin with shark imprint], man, I wanted the shark. Why you do me like that?" ACEVEDO-MARCHAN replied, "That was the shark [specific type of heroin]." BLOUNT responded, "Hell, no. That was the apple [another type of heroin with an apple imprint], man. Call him [FLORES]. Give me at least 500 [500 grams] of the shark [other type of heroin], man." ACEVEDO-MARCHAN remarked, "Okay, cool." BLOUNT stated, "Call them [FLORES] and see, man."

155. On November 6, 2010, at approximately 8:56 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #16364) to FLORES. During this call, ACEVEDO-MARCHAN stated, "He [BLOUNT] called me. He wants to know if you have the shark [other type of heroin FLORES had previously supplied]." FLORES advised, "Not right now, man." ACEVEDO-MARCHAN responded, "If you do, he wants a half [500 grams of heroin]. He [BLOUNT] wants it [heroin] for tomorrow. If you can get him the shark, he'll buy it right now." FLORES asked, "So, he didn't like the one [kilogram of heroin] he took [that BLOUNT picked up earlier in the day]?" ACEVEDO-MARCHAN advised, "Yeah, he liked it [heroin], but he likes the shark [other type of heroin] more." FLORES stated that he expected a delivery of the type of heroin stamped with the "shark" the next day.

¹⁹Additional allegations regarding CHARLES THOMAS's participation in the BLOUNT-BRIDGES DTO are set forth in ¶¶307-316, below.

9. The BLOUNT-BRIDGES DTO Purchases A Kilogram of Heroin from the FLORES DTO on November 24, 2010

156. Based on the calls and surveillance described below, as well as my knowledge of the investigation, I believe that, on November 24, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. After FLORES had to cancel the transaction on November 23, 2010, because his supplier mistakenly had sent a type of narcotics that was not heroin, FLORES was able to obtain the heroin on November 24, 2010. BLOUNT, BRIDGES and FLORES then met at the residence of ACEVEDO-MARCHAN, where BLOUNT and BRIDGES picked up the heroin.

157. On November 23, 2010, at approximately 12:22 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #33322) to FLORES. During this call, ACEVEDO-MARCHAN stated, "The guys [BLOUNT and BRIDGES] are here with me already." FLORES replied, "Let me make a call [to his source of supply]." ACEVEDO-MARCHAN responded, "Don't make me look bad, they're [BLOUNT and BRIDGES] here already." FLORES again stated, "Let me make a call."

158. On November 23, 2010, at approximately 12:41 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #33330) from BRIDGES. During this call, BRIDGES stated, "Open the fence [behind **the 1920 North Karlov Residence**], man. I can't get in there." ACEVEDO-MARCHAN replied in the affirmative.

159. On November 23, 2010, at approximately 12:44 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #33331) to FLORES. During this call, ACEVEDO-MARCHAN asked, "Ready [was FLORES ready to conduct the heroin transaction]?"

FLORES replied, "I came to meet with the person [the heroin supplier] just now, so give me some time. I'm just getting together with him." ACEVEDO-MARCHAN responded, "It's [the heroin transaction] going to happen right?" FLORES stated, "They [heroin suppliers] are on their way, give me some time."

160. On November 23, 2010, at approximately 1:00 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #33338) to FLORES. During this call, FLORES again stated that his source of supply was on his way. Later in the conversation, FLORES asked, "Is your guy [BLOUNT] there [**the 1920 North Karlov Residence**] already?" ACEVEDO-MARCHAN stated, "Yeah, they [BLOUNT and BRIDGES] are here with me." FLORES asked, "You already checked everything [counted the money], right?" ACEVEDO-MARCHAN responded, "Yeah, yeah, I want to make sure that you secured that [heroin] so I can start counting [the money]. . . That way you can go and they can go [ACEVEDO-MARCHAN wanted to make sure that the heroin transaction was completed quickly]." ACEVEDO-MARCHAN also asked, "It's a sure thing, right [ACEVEDO-MARCHAN asked if the heroin transaction was going to happen]?" FLORES stated, "Yes, they [source of supply] already called and told me that they were coming over here [to provide heroin to FLORES]."

161. On November 23, 2010, at approximately 2:18 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #33399) to FLORES. During this call, FLORES stated, "He [unknown supplier] said they made a mistake. That instead of bringing that [heroin], they brought some 'pitque [unknown translation, likely a narcotic other than heroin].' The guy [supplier] said it [the heroin delivery] would be today, but they don't know what time." ACEVEDO-MARCHAN replied, "These guys [BLOUNT and BRIDGES] are going to take off."

They are going to go with uncle [Acevedo-Fitz, an alternative source of supply for BLOUNT and BRIDGES]. Didn't you tell them [source of supply] what it was for?" FLORES responded, "Of course, but he [source of supply] said that the other guy [possibly a courier] fucked up. I'm really upset. You're not the only one waiting on me, man [FLORES had other customers to distribute heroin to]." FLORES further stated, "He [source of supply] told me it [heroin transaction] would be today, but not sure when. I really don't know what's going on." ACEVEDO-MARCHAN asked, "What about the other guy [an alternate source of supply for FLORES]?" FLORES responded, "I talked to him [alternate source of supply] right now and he told me that he was going to look into it [getting heroin], too." ACEVEDO-MARCHAN stated, "Find it [heroin] somewhere else to see what they tell you because these guys [BLOUNT and BRIDGES] are going to take off. They are going to wait another 15 minutes and then leave." FLORES advised, "Okay. I'm going to wait to see what they [sources of supply] tell me, okay. Give me some time."

162. On November 23, 2010, at approximately 4:59 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #33558) to FLORES. During this call, FLORES told ACEVEDO-MARCHAN that, "Tomorrow [heroin transaction] is for sure."

163. On November 24, 2010, at approximately 9:51 a.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #34395) to FLORES. During this call, FLORES stated, "They barely called me and told me that it [the narcotics delivery to FLORES] would be around 10 [10:00 a.m.]. ACEVEDO-MARCHAN responded, "When you have it, just call me." FLORES asked, "Are they [BLOUNT and BRIDGES] going to take long to arrive [to pick up the heroin], or what?" ACEVEDO-MARCHAN subsequently responded, "Okay, well, if its for sure, I'll call them right now . . . but its for sure, right?" FLORES stated, "All right, yeah." Within

minutes, ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #34397) to BRIDGES. During this call, ACEVEDO-MARCHAN stated, "He [FLORES] called me. He's ready [to conduct the heroin transaction]." Later in the call, BRIDGES asked, "Does he [FLORES] have it [heroin] in his hands, man?" ACEVEDO-MARCHAN advised, "Yeah, he [FLORES] told me that he got it [one kilogram of heroin] already."

164. At approximately 11:20 a.m., surveillance observed BRIDGES, driving the **Cadillac Escalade**, arrive at ACEVEDO-MARCHAN's residence, located at **the 1920 North Karlov Residence**, exit the vehicle and enter the residence. Shortly thereafter, at approximately 11:27 a.m., surveillance agents observed a silver Dodge Caravan previously seen on surveillance during narcotics transactions being driven by BLOUNT, arrive and park in the rear gated yard of **the 1920 North Karlov Residence**.

165. On November 24, 2010, at approximately 11:24 a.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #34460) to FLORES. During this call, FLORES asked, "Are my friends [BLOUNT and BRIDGES] there [ACEVEDO-MARCHAN's residence]?" ACEVEDO-MARCHAN stated, "They have been here for ten minutes, man." FLORES replied, "Okay, don't get anxious, I'll be right over there [ACEVEDO-MARCHAN's residence]."

166. At approximately 11:50 a.m., surveillance observed FLORES' grey Nissan Maxima arrive and park on the east side of the street of **the 1920 North Karlov Residence**. Shortly thereafter, surveillance observed FLORES and an unknown male exit the grey Nissan Maxima and enter the front door of **the 1920 North Karlov Residence**. Based on my knowledge of the

investigation, the intercepted calls and surveillance, I believe that, at this time, FLORES brought the heroin to **the 1920 North Karlov Residence** to deliver to BLOUNT and BRIDGES.

167. At approximately 11:58 a.m., surveillance observed BLOUNT, driving the silver Dodge Caravan, exit the gated area of **the 1920 North Karlov Residence**, and depart the area. At approximately the same time, surveillance agents observed FLORES and the unknown male exit **the 1920 North Karlov Residence**, FLORES place a black bag in the trunk of the grey Nissan Maxima, and then FLORES and the unknown male entered the grey Nissan Maxima and departed the area. I believe that the black bag contained the money that BLOUNT and BRIDGES paid FLORES for the heroin.

10. The BLOUNT-BRIDGES DTO Purchases 500 Grams of Heroin from the FLORES DTO on December 17, 2010

168. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on December 17, 2010, the BLOUNT-BRIDGES DTO purchased 500 grams of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. During the early morning of December 17, 2010, FLORES and ACEVEDO-MARCHAN went together to pick up narcotics from a supplier. ACEVEDO-MARCHAN then met with BRIDGES and provided BRIDGES a sample of the heroin. Later that day, BRIDGES brought the money to ACEVEDO-MARCHAN's residence, and then ACEVEDO-MARCHAN, a courier of ACEVEDO-MARCHAN, and a courier sent by FLORES, delivered the heroin to BLOUNT and BRIDGES on the south side of Chicago.

169. On December 15, 2010, at approximately 11:03 a.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #55153) to FLORES, who was using Target Phone

5. During this call, FLORES stated, "I called down there [Mexico] right now, all the way down there [Mexico] . . . They [sources of supply] are telling me that, if not today, it'll [load of narcotics] be tomorrow [when the narcotics would arrive]. They [sources of supply] told me to wait a little bit, but that it [load of narcotics] was a sure thing." ACEVEDO-MARCHAN subsequently asked, "Around what time today?" FLORES responded, "Uh, I don't know. They [sources of supply] are going to call me." ACEVEDO-MARCHAN stated, "Because they [BLOUNT and BRIDGES] are calling me. He [BLOUNT] called me today at 8:00 in the morning." FLORES advised, "Look, there's something [heroin] around, but it's [heroin] real high [price]. It's at six, five [\$65,000 per kilogram]." ACEVEDO-MARCHAN replied, "That's too high [price], man." FLORES stated, "Well, that's what I was saying." ACEVEDO-MARCHAN asked, "What about the other one [other type of heroin that FLORES usually supplies to BLOUNT]?" FLORES replied, "That one [load of heroin FLORES was waiting for] is going to be like always . . . the same [same type of heroin that FLORES normally distributes]." ACEVEDO-MARCHAN asked, "So at what time?" FLORES advised, "Fuck, I would want it to be now, but it's not that easy [FLORES stated that he has no control over the heroin shipment]." ACEVEDO-MARCHAN asked, "Do you have the one [heroin] for six, five [\$65,000] there?" FLORES stated, "Uh, they [sources of supply] are supposed to confirm later on about that." ACEVEDO-MARCHAN responded, "Okay, call me when you have that one [heroin]. I'm not going to answer this fucker [BLOUNT]."

170. On December 16, 2010, at approximately 8:43 p.m., ACEVEDO-Marchan, using Target Phone 4, made an outgoing call (Call #56548) to FLORES, who was using Target Phone 5. During this call, ACEVEDO-Marchan asked FLORES if everything was good and FLORES replied, "Good. Good. I was notified right now. They [suppliers] just called me. It [heroin] will arrive at

six [6:00 a.m.] in the morning . . . the guys [heroin suppliers' couriers] will arrive . . . Are we [FLORES and ACEVEDO-Marchan] doing it [narcotics transaction] in the morning?" ACEVEDO-Marchan replied, "Yes." FLORES reiterated, "Okay, so then my guy [suppliers' courier] is going to arrive at six in the morning [6:00 a.m.], okay? Should I call you at six [6:00 a.m.] then?" ACEVEDO-Marchan responded, "Call me and I'll go [to meet the suppliers' courier] with you." FLORES responded, "Alright then."

171. On December 17, 2010, at approximately 6:15 a.m., ACEVEDO-Marchan, using Target Phone 4, received an incoming call (Call #56935) from FLORES, who was using Target Phone 5. FLORES told ACEVEDO-Marchan, "I'm on my way over there [ACEVEDO-Marchan's residence]." On December 17, 2010, at approximately 6:55 a.m., ACEVEDO-Marchan, using Target Phone 4, received an incoming call (Call #56973) from FLORES, who was using Target Phone 5. FLORES told ACEVEDO-Marchan, "I'm outside [ACEVEDO-Marchan's residence]." Court authorized cell site information for Target Phone 4 (used by ACEVEDO-MARCHAN) and Target Phone 5 (used by FLORES) indicate that at approximately the same time as this telephone call, FLORES was in the vicinity of ACEVEDO-Marchan's residence, and that, beginning at approximately 7:30 a.m. on December 17, 2010, FLORES and ACEVEDO-Marchan traveled together toward downtown Chicago, stopped close to downtown Chicago, and then returned together to the vicinity of ACEVEDO-Marchan's residence.

172. On December 17, 2010, at approximately 8:42 a.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57060) from BRIDGES. During this call, ACEVEDO-MARCHAN stated, "I went up there this morning [ACEVEDO-MARCHAN went to pick-up the heroin], okay." BRIDGES replied, "Okay, I'm going to tell him [BLOUNT]."

ACEVEDO-MARCHAN responded, “Everything [heroin] is for you, man . . . Straight from over there [ACEVEDO-MARCHAN explained that the heroin had been delivered straight from Mexico]. I got it [heroin] in my hands.”

173. On December 17, 2010, at approximately 9:21 a.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57090) from FLORES, who was using Target Phone 5. During this call, FLORES stated, “I’m outside [of ACEVEDO-MARCHAN’s house], come out.” ACEVEDO-MARCHAN replied, “Come in so we can measure that [weigh the heroin], or are you leaving? I’m on my way [outside].”

174. On December 17, 2010, at approximately 9:58 a.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #57117) to BRIDGES. During this call, BRIDGES stated, “Hey, I’m going to have to come over there [to ACEVEDO-MARCHAN] to see what that shit [heroin] is like [judge the quality].” ACEVEDO-MARCHAN replied, “Don’t worry about it, there won’t be any excuse [the heroin is good quality].” BRIDGES asked, “Don’t worry about it?” ACEVEDO-MARCHAN stated, “I don’t want you to make two trips, you know? I got you. You are going to like it [heroin].” BRIDGES asked, “So, you don’t want me to see what it’s [heroin] like?” ACEVEDO-MARCHAN asked, “Then, you are going to come and go again?” BRIDGES explained, “No, I’m going to call you and you’re going to come [ACEVEDO-MARCHAN would deliver the heroin to BRIDGES].” ACEVEDO-MARCHAN replied, “Just come with the money [to purchase the heroin] and . . . just come and see me.” BRIDGES responded, “Okay, I’m going to come see you.”

175. On December 17, 2010, at approximately 1:13 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #57280) to FLORES, who was using Target Phone

5. During this call, ACEVEDO-MARCHAN stated, "I just met up with that guy [BRIDGES] on the expressway and he just left to go look [examine the heroin sample that ACEVEDO-MARCHAN had provided] and he [BRIDGES] will call me back right now so we can go over there [BRIDGES' residence], or I'll go."

176. On December 17, 2010, at approximately 2:54 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #57346) to BRIDGES. During this call, BRIDGES asked, "Are you ready [to conduct the heroin transaction]?" ACEVEDO-MARCHAN responded in the affirmative. BRIDGES stated, "Okay, I'm going to call you in a few and let you know what's happening. Where to come [to deliver the heroin]."

177. On December 17, 2010, at approximately 3:11 p.m., ACEVEDO-MARCHAN, using Target Phone 4, made an outgoing call (Call #57356) to FLORES. During this call, ACEVEDO-MARCHAN told FLORES, "Look, he [BRIDGES] already called me and it's [heroin] good [quality]." FLORES replied, "I knew that, I knew that the moment I looked at it [heroin]." ACEVEDO-MARCHAN replied, "Just let them [BRIDGES] put that [money] together and they will call me. We'll see what time we set that [narcotics transaction] up for."

178. On December 17, 2010, at approximately 4:01 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57395) from BRIDGES. During this call, BRIDGES stated, "I'm on my way over to you." At approximately 4:53 p.m., surveillance observed BRIDGES, driving his **Cadillac Escalade**, arrive at **the 1920 North Karlov Residence**.

179. On December 17, 2010, at approximately 5:04 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #57446) to FLORES, who was using Target Phone

5. During this call, ACEVEDO-MARCHAN stated, “My friend [BRIDGES] is here with me. He wants us to go over there [BRIDGES’ residence]. Let’s go quickly.”

180. On December 17, 2010, at approximately 5:13 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57451) from FLORES, who was using Target Phone 5. During this call, FLORES asked, “You’re going [to deliver the heroin to BRIDGES on the south side of Chicago]?” ACEVEDO-MARCHAN replied, “Yes. I’m going.” FLORES asked, “Alright, then. You said you need another car [to use for the heroin transaction]?” ACEVEDO-MARCHAN responded, “If you want, come and drop it [vehicle] off. Yes, dude.” FLORES stated that he was going to someone whom ACEVEDO-MARCHAN had met previously, to accompany ACEVEDO-MARCHAN to deliver the heroin to BRIDGES’ residence. ACEVEDO-MARCHAN asked, “Should I give him [FLORES’ narcotics associate] the money [proceeds from selling the heroin]?” FLORES responded in the affirmative and further instructed, “Yes, check it good [count the money well].” A few minutes later, ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57455) from FLORES, who was using Target Phone 5. During this call, FLORES stated, “Wait for him [narcotics associate]. He’ll be there in about five to six minutes there.” ACEVEDO-MARCHAN asked, “So, then he’ll [narcotics associate] go with my guy [ACEVEDO-MARCHAN’s courier]?” FLORES responded, “However you want. Talk to him.” ACEVEDO-MARCHAN later stated, “And I’ll just count it [money].”

181. At approximately 5:39 p.m., surveillance observed three Hispanic males exit **the 1920 North Karlov Residence** and enter a tan Toyota Sienna van, and depart the area. Approximately 5 minutes later, ACEVEDO-MARCHAN, using Target Phone 4, received an

incoming call (Call #57489) from BRIDGES, and stated, "I'm on my way, okay?" BRIDGES replied, "Okay."

182. At approximately 6:43 p.m., surveillance observed the following: (a) ACEVEDO-MARCHAN, driving a green Toyota Corolla, park in the 7900 block of South Carpenter Street; (b) at approximately 6:49 p.m., BRIDGES parked his **Cadillac Escalade** next to the green Toyota Corolla; (c) BRIDGES and BLOUNT exited the **Cadillac Escalade** and met with ACEVEDO-MARCHAN and another Hispanic male in front of **the 7922 South Carpenter Residence**; (d) all four subjects entered **the 7922 South Carpenter Residence**. I believe that, at this time, ACEVEDO-MARCHAN delivered the heroin to BLOUNT and BRIDGES.

183. On December 17, 2010, beginning at approximately 7:06 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed outgoing calls (Call ##57532, 57535) to UM4-19965, giving directions to **the 7922 South Carpenter Residence**. Beginning at approximately 7:10 p.m., surveillance observed the Toyota Sienna van park in the vicinity of **the 7922 South Carpenter Residence**, an unknown Hispanic male exit the Toyota Sienna van and meet with BLOUNT in the front of **the 7922 South Carpenter Residence**, where BLOUNT gave the Hispanic male a bag, and the Hispanic male then placed the bag in the tan Toyota Sienna van and departed the area. I believe that at this time, BLOUNT and BRIDGES gave the money for the heroin to a courier for FLORES.

184. On December 17, 2010, at approximately 7:17 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57549) from FLORES, who was using Target Phone 5. During this call, ACEVEDO-MARCHAN stated, "Hey, it's [heroin transaction] done, man. The guy [FLORES' narcotics associate] took the money." FLORES remarked, "Alright, then." ACEVEDO-MARCHAN replied, "Hey, uh, I sent him 30, okay [ACEVEDO-MARCHAN

had sent FLORES' narcotics associate back to FLORES with \$30,000]?" FLORES asked, "Why?" ACEVEDO-MARCHAN responded, "Because it was just the half [500 grams of heroin], right. It was 31 [\$31,000] right? He's [BRIDGES and BLOUNT] going to want another one [more heroin] tomorrow. So, it's [heroin] 62 [\$62,000 per kilogram]? 60 [\$60,000] for me [purchase price for ACEVEDO-MARCHAN], right?" FLORES stated, "It's alright man. It's alright."

185. On December 17, 2010, at approximately 7:36 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #57552) from BRIDGES. During this call, BRIDGES asked, "You cool [safe]?" ACEVEDO-MARCHAN replied, "Yeah. I'm cool [safe]." ACEVEDO-MARCHAN stated, "Tell Mingo [Domingo BLOUNT] that he owes me [money], okay, man?" BRIDGES remarked, "Alright." ACEVEDO-MARCHAN replied, "You owe me, okay, bro?" BRIDGES remarked, "Alright."

11. HOPKINS Collects Drug Debts and Acts As a Courier For The BLOUNT-BRIDGES DTO

186. HOPKINS had knowledge of and was an active part of the BLOUNT-BRIDGES DTO, as described in the following paragraphs:

a. HOPKINS Collects A Drug Debt on Behalf of BLOUNT

187. On August 9, 2010, at approximately 11:31 a.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #23945) to HOPKINS.²⁰ During that call, BLOUNT stated, "I gotta

²⁰The identification of HOPKINS and his voice in this Affidavit is based in part on the following: During intercepted calls (Call #'s 9513 & 23932) over Target Phone 1, the user of telephone number (601) 745-9077 referred to himself as "Richard." On December 3, 2010, pursuant to intercepted calls indicating that BLOUNT was picking up heroin from Acevedo-Fitz, surveillance observed a silver Dodge Caravan enter the garage of Acevedo-Fitz, the garage door closed, and a short time later, exit the garage. Surveillance followed the silver Dodge Caravan, and conducted an investigative stop, resulting in the seizure of a kilogram of heroin, as set forth below in ¶¶191-202. The driver, and sole occupant of the silver Dodge Caravan, provided a driver's license identifying himself as Richard HOPKINS. HOPKINS subsequently provided verbal consent to search the silver Dodge Caravan, which resulted in the seizure of approximately one kilogram of heroin. After being advised of his Miranda rights, HOPKINS provided

call Gabe [BRIDGES] and see what that [law enforcement officer who is friendly with HOPKINS] dude said.” HOPKINS remarked, “Awe, okay.” BLOUNT asked, “What’s you all buddy’s [law enforcement officer’s] name? He [law enforcement officer] said he’s gonna talk to Gabe [BRIDGES], but he [law enforcement officer] didn’t want to talk over the phone.” HOPKINS remarked, “Awe right, right, right.” BLOUNT stated, “So, let me call Gabe [BRIDGES] and see if he met him [law enforcement officer] and see what he said.” HOPKINS remarked, “Right.”

188. Later in the call described in the preceding paragraph, HOPKINS stated, “Yeah, I was just telling you to call Individual G [a narcotics customer of BLOUNT who owed BLOUNT a drug debt], cause he had been calling me and he couldn’t get you and I couldn’t get you, so I was saying just call him . . . he [Individual G] want to tell you something.” BLOUNT replied, “He did, it’s always something, ain’t it?” HOPKINS responded, “Yeah, yeah, I told him [Individual G], I said, ‘man stop playing.’ He say he [Individual G] wasn’t playing. He said ‘you’ll see.’ I’ll meet him [Individual G] tomorrow and everything a be alright. I said ‘well go ahead on cause it’s been almost a year [since Individual G had received narcotics from BLOUNT]. You know, you [Individual G] turned two months into a year [Individual G had promised to repay BLOUNT for narcotics within two months, but Individual G still had not paid the debt after one year]. You know, made me look bad [HOPKINS had vouched for Individual G as a drug customer to BLOUNT], made me lose faith, you know.’”

189. On August 10, 2010, at approximately 6:56 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #24949) to HOPKINS. During this call, BLOUNT asked, “Did he

his telephone number as (601) 745-9077 to law enforcement officers, the same telephone number used in intercepted calls over Target Phone 1, as described below. In the summaries of the intercepted calls in this Affidavit in which HOPKINS is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to HOPKINS in each of these summaries is the same.

[Individual G] call yet?” HOPKINS replied, “He [Individual G] called me, said he gonna be calling me back in 15 or 20 minutes. So, in a minute, I’m just gonna head out that way [to Individual G] and not wait for him to call.” BLOUNT stated, “Alright. He [Individual G] owe me 13 [amount of money, believed to be \$1,300, owed by Individual G to BLOUNT for a previous narcotics transaction]. You hear me?” HOPKINS asked, “Huh?” BLOUNT reiterated, “He [Individual G] owe me 13 [\$1,300] more.” HOPKINS asked, “Okay. Now, now, what if he [Individual G] don’t have 13 [\$1,300]? Don’t take nothing [money]?” BLOUNT responded, “Man, tell him [Individual G] I’m gonna shoot his ass.”

190. On August 10, 2010, at approximately 7:29 p.m., BLOUNT, using Target Phone 1, placed an outgoing call (Call #24966) to HOPKINS. During this call, HOPKINS stated, “Yeah, man. I went over there and, uh, he [Individual G] gave me, uh, \$800. I said, ‘man, I thought you said you [Individual G] had all the man’s [BLOUNT’s] money.’ ‘No, I [Individual G] talked to him [BLOUNT].’ Fucking man, ‘that man [BLOUNT] would have told me if you [Individual G] talked to him.’ I said, ‘man, please don’t be playing with this man [BLOUNT].’ He [Individual G] said, ‘that’s all [the money] I got. I’m [Individual G] gonna have the rest for him [BLOUNT] by [U/I].’” BLOUNT replied, “Alright. I’m playing [softball]. I’m on the field and shit.” Later in the call, HOPKINS stated, “I hope you don’t beat him [Individual G] up bud. If you do, ain’t nothing I can say, man. Fuck.”

b. HOPKINS Acts as a Courier for BLOUNT on December 3, 2010

191. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on December 3, 2010, the BLOUNT-BRIDGES DTO purchased

a kilogram of heroin from Acevedo-Fitz, in a deal brokered by Gambino, and that HOPKINS acted as a courier for BLOUNT, picking up the heroin from Acevedo-Fitz.

192. On December 2, 2010, at approximately 9:44 a.m., Gambino, using Target Phone 2, received an incoming call (Call #11570) from BLOUNT. During this call, BLOUNT asked, "Talk to the old man [Acevedo-Fitz] or what?" Gambino replied, "Yeah, I talked to the old man [Acevedo-Fitz]. What's up?" BLOUNT responded, "I'm trying to see what we're doing. I'm gonna need the whole one [one kilogram of heroin]." Gambino stated, "You need a whole one [one kilogram of heroin]? Okay, let me call the old man [Acevedo-Fitz]. I'll call you back in 10 minutes."

193. Approximately two minutes later, Gambino, using Target Phone 2, placed an outgoing call (Call #11571) to Acevedo-Fitz. During this call, Gambino stated, "The guy [BLOUNT] called me and he said he wants a whole one [one kilogram of heroin]." Acevedo-Fitz replied, "Tell him [BLOUNT] I can't right now, man, because that guy [source of supply] got mad yesterday because no one called. Tell him [BLOUNT] early tomorrow [for the heroin transaction]."

194. On December 3, 2010, at approximately 8:42 a.m., Gambino, using Target Phone 2, placed an outgoing call (Call #11629) to Acevedo-Fitz. During this call, Acevedo-Fitz stated, "We're set [for the one kilogram heroin transaction], but don't call me too much." Gambino replied, "Don't get mad. I just want to make sure that everything [one kilogram of heroin] is good with . . ." Acevedo-Fitz responded, "Yes, everything according to what we agreed [price and logistics of the transaction]."

195. On December 3, 2010, at approximately 9:59 a.m., Gambino, using Target Phone 2, received an incoming call (Call #11639) from BLOUNT. During this call, Gambino stated, "Today

at 12:00 [for the heroin transaction], man." BLOUNT replied, "I'm calling to make sure, man." Gambino responded, "Well, I already talked to him [Acevedo-Fitz] and he told me 12:00, but to make sure for us [Gambino, BLOUNT and BRIDGES] to be there [Acevedo-Fitz's residence], at 12:00 over there." Gambino instructed, "Everything [heroin] is ready. Just go in and out [of the garage]."

196. On December 3, 2010, at approximately 12:46 p.m., law enforcement officers observed Gambino, driving a black Ford F-150 pickup truck, arrive and park in the area of the 2049 North Kostner Residence. A few minutes later, Gambino, using Target Phone 2, received an incoming call (Call #11661) from Acevedo-Fitz. During this call, Gambino stated, "I'm parked . . . [at] Kostner and Dickens [in the area of the 2049 North Kostner Residence]." Acevedo-Fitz asked, "What about the others [BLOUNT and BRIDGES]?" Gambino advised, "They're on their way." Later in the call, Acevedo-Fitz instructed, "Wait there for them [BLOUNT and BRIDGES]." Gambino stated, "Okay, I'll wait for them. I'll call you right away so you can open it [the garage door] for us."

197. On December 3, 2010, at approximately 1:15 p.m., Gambino, using Target Phone 2, received an incoming call (Call #11664) from BRIDGES. During this call, Gambino asked, "Where are you?" BRIDGES replied, "I'm going to turn in the alley [alley south of the 2049 North Kostner Residence]." Gambino replied, "I don't see you. Okay, I see that big truck. Holy shit!"

198. Moments later, surveillance observed the following: (a) BRIDGES, driving his **Cadillac Escalade**, park in front of the garage for the 2049 North Kostner Residence; (b) Gambino exit the black truck, walked east across Kostner Avenue, and enter the rear passenger seat of the **Cadillac Escalade**; (c) the garage door of the 2049 North Kostner Residence open and the **Cadillac**

Escalade entered the garage, after which the garage door closed; at approximately 1:32 p.m., surveillance observed the following: (a) a silver Dodge Caravan arrived at the 2049 North Kostner Residence and entered the garage, and the garage door closed; (b) approximately twenty minutes later, Acevedo-Fitz, carrying a white bag, exited the residence and entered the garage; (c) at approximately 2:08 p.m., the **Cadillac Escalade** driven by BRIDGES and the silver Dodge Caravan driven by HOPKINS exited the garage and departed the area. Surveillance followed the silver Dodge Caravan directly from the 2049 North Kostner Residence to the area of 200 West 76th Street, Chicago, Illinois, where law enforcement officers then conducted an investigative stop on the vehicle and identified the driver of the vehicle as HOPKINS. The Dodge Caravan is registered to in HOPKINS' name, at the same address listed on HOPKINS' driver's license.

199. After HOPKINS provided officers with verbal consent to search the vehicle, HOPKINS and the silver Dodge Caravan were transported to a nearby police facility. There, a CPD K-9, Pantera²¹, searched the vehicle and gave a positive alert for the likely presence of narcotics in the front passenger seat area of the silver Dodge Caravan. A further search of the vehicle by law enforcement officers resulted in the discovery of a package inside the rear upper headrest of the front passenger seat, that contained a powdery substance. The substance was sent to the Illinois State Police laboratory, where it was analyzed by an expert in forensic chemistry, and determined to consist of 1,005 grams of a mixture containing heroin.

²¹Pantera is trained to sniff buildings, vehicles, money and wrapped parcels to detect the odors of heroin, cocaine, marijuana, and other narcotics/controlled substances which could be contained therein. Pantera is also trained to indicate the presence of such substances or their scents by biting and scratching the item being sniffed. Pantera was initially certified as fully trained to detect narcotics in October 2009, attends training on a monthly basis, and was re-certified in June 2010. According to Chicago Police records, Pantera has successfully alerted to controlled substances for a success rate of 97%.

200. During the transport of HOPKINS to the police station, law enforcement officers read HOPKINS his *Miranda* rights, and HOPKINS waived his rights and agreed to talk to the law enforcement officers. HOPKINS stated that the Dodge Caravan belonged to BLOUNT, and that it was registered in HOPKINS's name at the request of BLOUNT. HOPKINS claimed not to know BLOUNT's first name. HOPKINS claimed that he had borrowed the Dodge Caravan from BLOUNT on December 3, 2010, to use it to visit HOPKINS's mother, and that he had picked up the Dodge Caravan, driven straight to his mother's house, located on the 5100 block of West Wabansia, and that he was on his way home from his mother's house when he was stopped by police. HOPKINS further claimed that he had no knowledge of the drugs found in the Dodge Caravan.

201. HOPKINS's statements described in the preceding paragraph were contrary to the fact that surveillance had stopped HOPKINS after following him directly from Acevedo-Fitz's residence.

202. HOPKINS's statements also were contrary to previously intercepted communications indicating that HOPKINS had knowledge of the narcotics activities of, and was part of, the BLOUNT-BRIDGES DTO before the December 3 seizure, specifically: (a) HOPKINS's collection of a drug debt on behalf of BLOUNT, as described in ¶¶188-190, above; and (b) HOPKINS discussion with BLOUNT of the trap in his GMC Denali, seized by law enforcement on July 23, 2010, as described in ¶¶ 61-79, above, and HOPKINS's offer to help get the vehicle back.²²

²²Specifically, on July 27, 2010, at approximately 2:16 p.m., BLOUNT, using Target Phone 1, received an incoming call (Call #12853) from HOPKINS, who was using the same telephone number that HOPKINS had provided to the police during the investigative stop on December 3, 2010, as described above. During this call, BLOUNT complained about the law enforcement seizure of his GMC Yukon Denali. HOPKINS responded, "Yeah, I see what you're doing now, okay. No, you, no you gotta do that [retrieve the GMC Yukon Denali]. You gotta get that, cause that [vehicle] mean everything [assists in BLOUNT's drug trafficking]." BLOUNT replied, "Yeah, what did you say?" HOPKINS replied, "I said you gotta do what you gotta do cause you gotta get that truck [GMC Yukon Denali] back. That's the

12. The BLOUNT-BRIDGES DTO Purchases Cocaine

203. As set forth below, in ¶¶318-334, the BLOUNT-BRIDGES DTO purchased 1.5 kilograms of cocaine from ANGEL HERNANDEZ on January 15, 2011.

204. As set forth below, in ¶¶239-258, the BLOUNT-BRIDGES DTO purchased 2.5 kilograms of cocaine from the FLORES DTO in February 18, 2011.

B. THE FLORES DTO

1. THE FLORES DTO sells approximately 7.4 kilograms of heroin to the BLOUNT-BRIDGES DTO

205. As set forth above, in ¶¶46-60, 80-185, the FLORES DTO has supplied approximately 7.4 kilograms of heroin to the BLOUNT-BRIDGES DTO.

2. The FLORES DTO Obtains Three Kilograms of Heroin from a Mexican Source of Supply on February 9, 2011

a. GARCIA delivers three kilograms of heroin to FLORES

206. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on February 9, 2011, a Mexican supplier (“Mexican Supplier”) fronted three kilograms of heroin to the FLORES DTO. The three kilograms of heroin were

main truck [HOPKINS knew that BLOUNT used the GMC Yukon Denali to transport large shipments of heroin].” BLOUNT responded, “Yeah, they [police] done took my shit [vehicle] cause of the built-in compartment [trap] man. Ain’t shit [heroin] in that [BLOUNT had stored the heroin in a separate location inside the vehicle]. What the fuck you all mean?” HOPKINS asked, “How did they [police] find that out [about the vehicle trap]?” BLOUNT stated, “I don’t know, somewhere they [police] looked up under the car and said man, this mother fucker’s got built-in device [trap]. I don’t know man” Later in the call, BLOUNT asked, “How’s the [law enforcement officer friendly with HOPKINS, who BLOUNT and BRIDGES had previously discussed about obtaining information from regarding the seizure of BLOUNT’s GMC Yukon Denali with the heroin] do it about it, man?” HOPKINS replied, “Yeah. You got a lot on your hands. Don’t worry about it. I’ll find somebody [HOPKINS would find another individual to ask about the seizure of BLOUNT’s vehicle].”

delivered by GARCIA, and then FLORES gave SOBERANIS-CAMPOS the payment for the three kilograms of heroin, to be delivered to Mexican Supplier. During a traffic stop of SOBERANIS-CAMPOS, law enforcement seized the money paid by FLORES for the heroin.

207. On January 24, 2011 at approximately 12:21 p.m., FLORES, using Target Phone 7, placed an outgoing call (Call #85) to Mexican Supplier. During this call, Mexican Supplier stated, "I'll send them (three kilograms of heroin) Wednesday. I have them [three kilograms of heroin]. They're ready. . . I just have to take them to the guy [heroin courier] so he can leave." FLORES then asked, "Okay, so when will it [heroin] be over here [in Chicago]?" Mexican Supplier replied, "By the weekend, God willing." Later in the conversation, Mexican Supplier told FLORES, "Yeah, let me just get situated. The thing is, I've had some situations come up [problems obtaining heroin], but now that I am back on track, you won't be missing any work [an ample supply of heroin will be forthcoming] . . ."

208. On February 4, 2011, at approximately 1:04 p.m., FLORES, using Target Phone 7, placed an outgoing call (Call # 272) to Mexican Supplier. During this call, Mexican Supplier stated, "I am in Cuernavaca [Mexico]. The thing is that these guys [heroin couriers] are behind, but they [likely the heroin couriers] already arrived [in Mexico]. They [heroin couriers] are leaving from here [Mexico] tomorrow. They should be there by you [in Chicago] by Wednesday." Later in the call, Mexican Supplier stated, "This guy [GARCIA] is only going to take three [kilograms of heroin]. Only three [kilograms of heroin] are going [to Chicago]." FLORES replied, "Oh shit, that's bad!" Mexican Supplier asked, "Did you need more [heroin], or what?" FLORES stated, "Yeah, at least what I told you." Mexican Supplier asked, "You needed like six [kilograms of heroin], or what?" FLORES replied, "Yes." Mexican Supplier then stated, "Listen, take . . . these three

[kilograms of heroin] for now, and uh . . . the thing is that we are also struggling [having difficulty obtaining heroin]. You know what happened to us, and you know that uh . . . it's all about the money." FLORES later stated, "Oh well, if we can't get more [heroin], oh well. That's what we are going to need to do. And after that, what?" Mexican Supplier replied, "Well, we could send you those three [three kilograms of heroin], and then uh . . . if there is money quickly, we can send you six or seven [kilograms of heroin] maybe."

209. On February 4, 2011, at approximately 2:03 p.m., FLORES, using Target Phone 7, placed an outgoing call (Call # 280) to Mexican Supplier. During this call, FLORES stated, "Here talking to my buddy [narcotics associate]. . . I was telling him [narcotics associate] that if this is quick, you would come up with another one [shipment of heroin] real quick. As soon as I get that [heroin], I'll try to send it over there [New York] real quick so the other [heroin shipment] can come right away, okay?" Mexican Supplier replied, "Yeah, as soon as you have that [shipment of heroin], I'll bring that one [a subsequent shipment of heroin] and it will happen right away. As soon as I see 'paper' [money] here, we can be sending about one [one kilogram of heroin] every three days. But the thing is, we need capital [money to purchase heroin]. They [law enforcement] gave us a big beating and we're barely getting back on our feet."

210. On February 8, 2011, at approximately 10:35 a.m., FLORES, using Target Phone 7, received an incoming call (Call #318) from Mexican Supplier. During the call, Mexican Supplier told FLORES, "Look, those buddies [drug couriers] are already on that side [United States]. I think by tomorrow, they'll be around there [Chicago area] early." FLORES replied, "Okay, let me know what time." Mexican Supplier replied, "I'm going to give your number to my buddy [UM532], he's going to be calling you on the radio [Nextel Push-to-Talk feature on Target Phone 7]. He's [UM532]"

going to pass your number along to the guy or girl whom is going over there [the courier bringing the heroin to Chicago, later identified as GARCIA]." FLORES acknowledged and Mexican Supplier continued, "I'm going to give your numbers to the guy [the courier] who is going over there [Chicago], the one who is bringing it [heroin] up there. I think by tomorrow, it [the three kilograms of heroin] will be there [Chicago]."

211. On February 8, 2011, at approximately 10:39 a.m., FLORES, using Target Phone 7, received an incoming call (Call # 319) from Unidentified Male - #532 ("UM532"). At the start of the call, UM532 told FLORES, "Hey, I'm Luis' [Mexican Supplier's] buddy. They [the courier delivering the heroin to Chicago] should be calling you either this afternoon or tomorrow morning. I will confirm later on . . . so you can be on the lookout [ready]. They are going to ask for the buddy, that way I won't give them any names. They are just going to ask you, 'hey, buddy?' and that's it." FLORES replied, "Okay. Just for buddy, okay." UM532 stated, "I'm going to ask you for a favor, as soon as they call you, call me, please. Just to know that they're . . ." FLORES interrupted and said, "That's fine, all right then. You said today or tomorrow, right?" UM532 replied, "I'll confirm with you later on about what time [the courier will arrive] and I'll call them later on to see exactly their location and I'll tell you more or less. But when they call you, they're going to ask for "buddy," you call me, please. They [the courier] won't call you until they are there [in Chicago], if not they're not going to call you. I'm also not going to give them your number until they are there. As soon as they get there and I know they're fine, I'll give the number. Like I said, for all our safety." FLORES agreed.

212. Shortly after this call, at approximately 10:57 a.m., FLORES, using Target Phone 7, received an incoming call (Call #320) from UM532. UM532 told FLORES, "Between 1:00 [p.m.]

or 2:00 [p.m.] more or less. It [the courier's arrival with the 3 kilograms of heroin] can be a little sooner or later, but it's for today. Listen, please give them [the courier] 5 [\$5000] or 5 ½ [\$5,500] [as a fee for delivering the heroin]." FLORES repeated, "Okay, 5 ½ [\$5,500]. For today, then?" UM532 replied, "Yes, sir."

213. On February 8, 2011, at approximately 5:23 p.m., FLORES, using Target Phone 7, received an incoming call (Call #368) from Mexican Supplier. Mexican Supplier told FLORES, "Well, my buddy [UM532] is going to be communicating with you. He [UM532] just called me and told me to tell you not to get anxious that they [the courier] may get delayed. They might arrive late night or tomorrow if it they get delayed, but everything is fine." FLORES stated, "I want to see if I can have 'that' [money] quickly, quickly for you so you can do it again [send another load of heroin] right away." Mexican Supplier responded, "If you can get those [kilograms of heroin] done [sold] for me quick, I can send you like six [six additional kilograms of heroin]." FLORES agreed and said, "That's what I want. That's what I'm talking about with this buddy [narcotics associate, likely HERRERA, who subsequently transported the three kilograms of heroin to New York, as set forth below]. I told him that things [narcotic transactions] are to be done quickly, so we can send it [money] back [to Mexican Supplier] right away and then back [Mexican Supplier will send more heroin] again."

214. On February 8, 2011, at approximately 8:21 p.m., FLORES, using Target Phone 7, placed an outgoing call (Call #393) to HERRERA.²³ During this call, FLORES stated, "They

²³The identification of HERRERA and his voice in this Affidavit has been based in part on the following: On January 3, 2011, a call (Call #396) was intercepted over Target Phone 5, where FLORES and the user of telephone number (773) 696-8969 agreed to meet. At approximately 3:56 p.m., another call (Call #398) was intercepted over Target Phone 5, where the user of telephone number (773) 696-8969 stated, "I'm here at the dollar store on Mango [Avenue]. Here on this side of Fullerton." FLORES replied, "Okay. I'm almost there." At about the same time, surveillance observed FLORES, driving a

[heroin sources of supply] are telling me to be ready with this [money to pay for the heroin], that it [heroin shipment] was delayed. They may be around two in the morning [the heroin shipment will arrive], something like that." HERRERA subsequently stated, "Alright, that's fine. A bit late, but no problem." FLORES and HERRERA then discussed the expected timing of the delivery of the three kilograms of heroin, and FLORES concluded the conversation by stating, "But be ready [to assist in receiving/transporting the heroin], okay?" HERRERA agreed.

215. On February 9, 2011, at approximately 5:35 a.m., FLORES, using Target Phone 7, made an outgoing call (Call #401) to UM532. UM532 asked FLORES, "Did they [the courier] call you already?" FLORES replied, "Yeah, he [the courier] sent me a text message." UM532 asked FLORES, "What did it [text message] say?" FLORES replied, "That he [the courier] is there at a . . . hotel, he tells me. You think it would be good for me to go [to the hotel] at sunrise?" UM532 replied, "Yeah, well not right now." FLORES stated, "Alright then, because he [courier] told me

Toyota Scion, arrive at the corner of Mango and Fullerton Avenues, and pick-up a Hispanic male, later identified as HERRERA when law enforcement officers compared known driver's license and surveillance photographs of HERRERA. Furthermore, on February 10, 2011, at approximately 10:45 p.m., a call (Call #568) was intercepted over Target Phone 7, where the user of telephone number (773) 641-8971 stated, "Yes, I just left [Chicago]. . . we're about to enter Indiana, dude." During other intercepted calls (Call #'s 567 & 570) over Target Phone 7, FLORES told the user of telephone number (773) 641-8971 that he wished him "a lot of luck" and that FLORES hoped he "arrived safely" to his destination. Based on intercepted calls over Target Phone 7, and my knowledge of this investigation, I believe that FLORES and HERRERA were discussing HERRERA's trip to New York to deliver three kilograms of heroin. On February 11, 2011, as set forth below, law enforcement officers in New York conducted a stop of HERRERA's black BMW bearing Illinois license plate E173726, and identified HERRERA as the passenger of the vehicle, after HERRERA produced an Illinois driver's license. During a call (Call #206) intercepted over Target Phone 9, FLORES and another individual discussed "Jose" being in "New York." Based on the above information, law enforcement officers have identified HERRERA as the user of telephone numbers (773) 696-8969 & (773) 641-8971. Spanish linguists contracted by DEA have compared the voices of the user of telephone numbers (773) 641-8971, (773) 312-6894, (773) 312-6985, (773) 696-8969 and (773) 299-2686 and have concluded that all of the voices are the same. In the summaries of the intercepted calls in this Affidavit in which HERRERA is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to HERRERA in each of these summaries is the same.

that he [courier] was there at a hotel so then at sunrise, I'll go [to meet with the courier]." UM532 replied, "Be very careful. Call me when you dispatch [finish meeting with] them, please."

FLORES agreed.

216. On February 9, 2011, at approximately 7:50 a.m, FLORES, using Target Phone 7, received an incoming call (Call #507) from the courier, GARCIA, as identified below. GARCIA told FLORES, "Hey, they [hotel management] are asking me for the room." FLORES told GARCIA that he didn't understand him and GARCIA repeated, "I rented the room and they told me to check out at 8:00 [a.m.]. I'm here outside of the motel." FLORES asked GARCIA, "Where exactly are you?" GARCIA replied, "On Cicero [Avenue] or something like that. The motel is Karabana [Karavan Hotel, located in the area of 16th Street and Cicero Avenue, Cicero, Illinois], or something like that." FLORES repeated, "But where are you?" and GARCIA replied, "In front of the motel's office." FLORES told GARCIA, "Oh . . . come outside. How are you dressed?" GARCIA replied, "I have a New York [Yankees] jacket."²⁴

²⁴The identification of GARCIA and his voice in this Affidavit has been based in part on the following: At approximately 9:45 a.m., law enforcement officers conducting surveillance at the Karavan Hotel in Cicero, Illinois, observed the individual now known as GARCIA, wearing a New York Yankees jacket, standing in front of the hotel. Law enforcement officers subsequently followed GARCIA from the hotel to the Greyhound bus station, located at 620 West Harrison Street, Chicago, Illinois. At approximately 10:30 a.m., a law enforcement officer spoke with a clerk working at the Karavan Hotel. The clerk advised that Ruben GARCIA III, using a Texas driver's license (#23883401), checked into the hotel at approximately 4:00 a.m. that day, and that GARCIA provided his address as 3500 Bartlett, Apt. 106, Laredo, Texas. Based on this information, law enforcement officers located a Texas driver's license photograph (#23883401) of GARCIA, which listed GARCIA's address as 3500 Bartlett, Apt. 104, Laredo, Texas. Law enforcement officers then compared this photograph with surveillance photographs taken of GARCIA on February 9, 2011, and subsequently identified GARCIA as the individual observed on that day standing outside the hotel wearing the New York Yankees jacket. Furthermore, law enforcement officers also received subscriber information pertaining to telephone number (956) 462-9380 from Cricket, which revealed that this phone is subscribed to Ruben Garcia, 3550 North Barlette, #104, Laredo, Texas. Based on the above information, law enforcement officers identified GARCIA as the user of telephone number (956) 462-9380. In the summaries of the intercepted calls in this Affidavit in which GARCIA is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to GARCIA in each of these summaries is the same.

217. Shortly after this call, on February 9, 2011, at approximately 7:56 a.m, FLORES, using Target Phone 7, made an outgoing call (Call #510) to GARCIA. FLORES told GARCIA, "Cousin, walk over here to the mall. It's in front of where you are. Cross the street and come to the mall that's in front." During this call, FLORES received an incoming call on the call waiting feature from UM532. UM532 asked FLORES, "Did you get a hold of the guy [GARCIA] already?" FLORES replied, "Yes, I'm seeing him [GARCIA] now. I'll call you shortly." Based on the intercepted calls, surveillance and my knowledge of the investigation, I believe that, at this time, GARCIA delivered three kilograms of heroin to FLORES, as FLORES confirmed in the call to Mexican Supplier, described in the next paragraph.

218. On February 9, 2011, at approximately 9:08 a.m. FLORES, using Target Phone 7 received an incoming call (Call #519) from Mexican Supplier. FLORES told Mexican Supplier, "I'm going to check that [heroin] out later on, okay?" Mexican Supplier replied, "Yes, that's fine. Listen, how much did you give that guy [GARCIA]?" FLORES replied, "The buddy [UM532] told me to give him [GARCIA] 5 ½ [\$5,500] [as a fee for delivering the heroin]. Was that good?" Mexican Supplier replied, "Well, that's fine." FLORES replied, "I'll check that [heroin] out shortly." Mexican Supplier agreed.

b. FLORES pays \$144,500 to SOBERANIS-CAMPOS for the three kilograms of heroin

219. On February 10, 2011, at approximately 11:38 a.m., FLORES, using Target Phone 7, received an incoming call (Call #547) from Mexican Supplier. During this call, FLORES stated, "We are just here. My buddy [HERRERA] is coming. I haven't taken anything out [FLORES had not looked at the heroin], okay?" FLORES continued, "I haven't seen it [heroin] but I am going to see it [heroin] today. I don't want to see it until it's [heroin] ready to go out [be distributed] . . . I

am going to see all of that [all three kilograms of heroin] today." Mexican Supplier stated, "That's fine, but take it [heroin] out because otherwise it might become damp." Later in the call, Mexican Supplier instructed, "Take it [heroin] out of the containers [containers that the heroin was shipped in] because . . . otherwise, they [kilograms of heroin] might get wet." FLORES stated, "Uh, huh. I saw one [one kilogram of heroin] yesterday. I think it [heroin] looks good. What did he say? Did he say that he [Mexican Supplier' narcotics associate] made it [heroin] better [quality] than last time? Are these [kilograms of heroin] nicer?" Mexican Supplier advised, "Yeah, yeah, they [kilograms of heroin] are better [than previous kilograms of heroin]." FLORES asked, "Alright, did he give you a better percentage [purity]?" Mexican Supplier replied, "Yeah, yeah, those [kilograms of heroin] are good [quality]. Later in the call, Mexican Supplier stated, "Give me a call once you have something [money]." FLORES subsequently stated, "Uh huh, because today I might be able to . . . tell me if I should give it [money] to your brother, to the same guy, or what?" Mexican Supplier advised, "Yeah, right there with him." FLORES further stated, "Let's see if I can do that [collect the money] today, buddy . . . Pay you that [money from the sale of the heroin] quickly, so you can get ready fast [send another shipment of heroin to Chicago], okay?" Mexican Supplier remarked, "Yeah, right away, then." FLORES advised, "You will see that with me, you are not going to have any of this or that [FLORES would not give Mexican Supplier any problems with the collection of the money from the heroin sale], no." Mexican Supplier asked, "Do you have a way of sending? Have you ever sent it [sending the money to Mexico]?" FLORES stated, "No, buddy. That's the problem." Mexican Supplier stated, "Uh, huh, alright. Well, then give it [money] to him . . ."

FLORES asked, "Your brother?" Mexican Supplier confirmed, "Yeah, to my brother. I will give you a call later, or give me a call at the house. I am going to be there."

220. On February 11, 2011, at approximately 1:06 p.m., FLORES, using Target Phone 7, received an incoming call (Call #585) from Mexican Supplier. During this call, Mexican Supplier asked, "So, how is the job [heroin distribution and money collection] doing?" FLORES replied, "Fine, my buddy [HERRERA] went over there [New York] where he goes to work [distribute heroin]. Up there [New York] where he goes to work and uh . . . but he didn't leave me everything [HERRERA and FLORES's heroin customer did not leave the full amount of money for the purchase of heroin], but I am going to complete it [collect the full amount of money] so that I can give it to your brother." Mexican Supplier responded, "Alright, that's fine. Tell me when, so that I can call him. That way, he can send it [money] right away to me because I have some things here past due [previous drug debts] so I can send them over there." FLORES stated, "Oh, I can do that today [drop the money] if you want then? You know that I like to . . . even if I end up with nothing but . . . pay you so that you can be straight [no debt with source of supply] over there." Mexican Supplier asked, "Alright then, uh...how much [money] are you going to give him . . . mine [amount of money] would be . . . 150 [\$150,000] . . . it would be 144 ½ [\$144,500], right?" FLORES confirmed, "Yes, exactly." Mexican Supplier stated, "You would give Pancho the 'peso' [money]." FLORES responded, "Alright, I'll give it [money] to him."

221. On February 11, 2011, at approximately 4:24 p.m., FLORES, using Target Phone 7, placed an outgoing call (Call #592) to Mexican Supplier. During this call, FLORES stated, "Tomorrow early, early at whatever time you want [FLORES would deliver the money for the heroin] but early?" Mexican Supplier replied, "No, that's fine. Yeah, it's better that way so you aren't rushed. Well, I'll tell Cebollo SOBERANIS-CAMPOS] and pass him your number, and then you guys can make arrangements [to conduct the money transaction] early. Either way, he'll give

you a call later tonight and you guys can make arrangements to meet.” FLORES responded, “Look, okay. Give him my number and for him to call me early. I like to do things in the early morning instead.”

222. On February 11, 2011, at approximately 4:27 p.m., FLORES, using Target Phone 7, received an incoming call (Call #593) from Mexican Supplier. During this call, Mexican Supplier stated, “It’s set [money transaction]. Right now, I’m going to give him your number so he can give you a call later on this evening.” FLORES remarked, “All set then, cousin.” Mexican Supplier replied, “Alright, then, we’ll talk . . . it’s 144½ [\$144,500], right? What you have to give him, right?” FLORES confirmed, “Yes, that’s it.”

223. On February 11, 2011, at approximately 8:22 p.m., FLORES, using Target Phone 7, made an outgoing call (Call #596) to SOBERANIS-CAMPOS.²⁵ During this call, SOBERANIS-CAMPOS stated, “I’m the brother of that friend [Mexican Supplier]. He told me to call you.” FLORES asked, “Can I see you tomorrow early? Is that okay? Can you do it [money transaction]

²⁵The identification of SOBERANIS-CAMPOS and his voice in this Affidavit is based in part on the following: As described below, pursuant to intercepted calls in which FLORES and SOBERANIS-CAMPOS set up a meeting, surveillance observed FLORES meet with SOBERANIS-CAMPOS; surveillance followed SOBERANIS-CAMPOS from the meeting, and conducted an investigative stop on SOBERANIS-CAMPOS. SOBERANIS-CAMPOS told officers that his name was Ranulfo SOBERANIS-Campos. Law enforcement officers found that SOBERANIS-CAMPOS was in possession of two forms of Mexican photo identification, both of which matched his description, and both of which were issued under the name “Ranulfo SOBERANIS-Campos.” Law enforcement detained SOBERANIS-CAMPOS and ran his fingerprints through a state identification system, which returned a criminal record under the name “Ranulfo SOBERANIS-Campos.” SOBERANIS-CAMPOS also provided verbal consent to search his cellular telephones; the search revealed that SOBERANIS-CAMPOS was in possession of the cellular telephone using telephone number (331) 422-6383, which was intercepted talking to FLORES over Target Phone 7. Based on the above information, law enforcement officers identified SOBERANIS-CAMPOS as the user of telephone number (331) 422-6383. In the summaries of the intercepted calls in this Affidavit in which SOBERANIS-CAMPOS is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to SOBERANIS-CAMPOS in each of these summaries is the same.

early?" SOBERANIS-CAMPOS confirmed, "Yes, just tell me where." FLORES advised, "Okay, I'll let you know early tomorrow, okay?" SOBERANIS-CAMPOS agreed.

224. The next day, on February 12, 2011, at approximately 9:58 a.m., FLORES, using Target Phone 7, placed an outgoing call (Call #603) to SOBERANIS-CAMPOS. During this call, FLORES asked, "I'm sorry, who am I speaking with?" SOBERANIS-CAMPOS advised, "I am Jose's [Mexican Supplier] brother." FLORES asked, "Yes, Jose Luis's [Mexican Supplier], right?" SOBERANIS-CAMPOS confirmed. FLORES asked where he was, and SOBERANIS-CAMPOS advised that he was "at home." FLORES asked, "Uh, you live where you told me that one time, right?" SOBERANIS-CAMPOS confirmed, "Uh, huh." FLORES asked, "Should I meet you where I met you at that day [previous transaction]?" SOBERANIS-CAMPOS confirmed, "Alright, sounds good." FLORES asked, "How far are you from there?" SOBERANIS-CAMPOS responded, "That's [meet spot] close by. It'll take me about six minutes." Later in the call, FLORES stated, "I'll see you there [meet spot], then."

225. On February 12, 2011, at approximately 10:02 a.m., FLORES, using Target Phone 7, placed an outgoing call (Call #605) to SOBERANIS-CAMPOS. During this call, SOBERANIS-CAMPOS stated, "I'm on my way there [meet spot] now." FLORES replied, "Okay, I'll be there."

226. On February 12, 2011, beginning at approximately 10:20 a.m., surveillance observed the following: (a) FLORES and an unidentified female ("UF"), with the UF carrying an off-white bag, exited **the 4910 West Medill Residence**, Chicago, Illinois and entered FLORES' **Black Nissan Pathfinder**, and departed the area; (b) the **Black Nissan Pathfinder** proceeded to a shopping center parking lot, located at Diversey and Kilpatrick in Chicago, Illinois, where the UF exited the **Black Nissan Pathfinder** and the vehicle then departed the area; (c) shortly thereafter, the **Black Nissan**

Pathfinder parked in the area of 2430 North Kilpatrick, and a white GMC Envoy parked across from the **Black Nissan Pathfinder**; (d) SOBERANIS-CAMPOS exited the driver seat of the GMC Envoy and entered the passenger seat of the **Black Nissan Pathfinder**; and (e) moments later, SOBERANIS-CAMPOS exited the **Black Nissan Pathfinder** while placing an off-white bag inside his jacket, re-entered the GMC Envoy and departed the area. I believe that, at this time, FLORES delivered to SOBERANIS-CAMPOS the money, contained in the off-white bag, for the three kilograms of heroin obtained from the Mexican Supplier.

227. Surveillance followed the GMC Envoy from Chicago to Bensenville, Illinois. During this time frame, surveillance observed SOBERANIS-CAMPOS driving the GMC Envoy in an erratic manner, by driving at high rates of speed and changing lanes without signaling. At approximately 11:07 a.m., while surveillance was following SOBERANIS-CAMPOS, FLORES, using Target Phone 7, received an incoming call (Call #616) from SOBERANIS-CAMPOS, during which SOBERANIS-CAMPOS stated, "Hey, why didn't you tell me they [law enforcement officers] were watching you . . . They [law enforcement officers] are following me now . . . They [law enforcement officers] are behind me . . . There are about five cars [police cars] behind me." FLORES subsequently responded, "No man, be careful. I swear to God it wasn't me [who was being followed by police]. I came back to get my wife here at Discovery [a store in the mall]." SOBERANIS-CAMPOS stated, "I'm going to try and get away from them and toss that [\$144,500 in U.S. Currency], because I don't want them [police] to fuck me over [take the money and arrest SOBERANIS-CAMPOS]."

228. At approximately 11:20 a.m., law enforcement officers made an investigative stop on the GMC Envoy in the area of 157 South York Road, Bensenville, Illinois. A law enforcement

officer approached the vehicle and observed an off-white bag on the front floorboard of the GMC Envoy. SOBERANIS-CAMPOS was detained by law enforcement officers and SOBERANIS-CAMPOS provided officers with verbal consent to search the GMC Envoy. During a search of the vehicle, law enforcement officers recovered the off-white plastic bag, which was found to contain \$144,500.00 United States Currency. Later, a CPD K-9 Unit, "Pantera," conducted an open air sniff of the off-white plastic bag and United States Currency, and alerted positively for the likely presence of narcotics.

229. On February 12, 2011, at approximately 11:27 a.m., FLORES, using Target Phone 7, received an incoming call (Call #619) from Mexican Supplier. During this call, FLORES stated, "Look, I saw your brother [SOBERANIS-CAMPOS] a little bit ago and gave him that [money] already, okay?" Mexican Supplier replied, "Oh, okay. That's good." FLORES responded, "But look . . . it's been over an hour that I saw him [SOBERANIS-CAMPOS] and your brother just called me . . . He [SOBERANIS-CAMPOS] says that they [police] are behind him [following]. I went with my wife to give him that [give the money to SOBERANIS-CAMPOS] and went to a store called Discovery. He just called me now and I'm worried. He says that they [police] are behind him, but it's been over an hour ago that I gave him that [money], well over an hour." Mexican Supplier remarked, "Uh, huh." FLORES stated, "And he [SOBERANIS-CAMPOS] just called me. I told him, 'No, man,' because he says that they [police] are behind him. I had been calling your house for a while to let you know that everything was good and he [SOBERANIS-CAMPOS] called me with those news. He [SOBERANIS-CAMPOS] said that he wanted to toss that [money]. He's [SOBERANIS-CAMPOS] like, 'I'm going to toss this [get rid of the money].' I told him not to." Mexican Supplier advised, "He [SOBERANIS-CAMPOS] should leave the car somewhere and

leave on foot.” FLORES stated, “Uh, huh. I told him, ‘Man, why are you going to toss that [throw the money]? No, man.’ . . . He says they [police] are behind him . . . I was also on the look out [for police], but everything was calm. It was all calm and now he’s [SOBERANIS-CAMPOS] telling me this. That was over an hour ago, cousin . . . it’s been like an hour and a half and he just called me now.”

230. On February 12, 2011 at approximately 3:07 p.m., FLORES, using Target Phone 7, received an incoming call(Call #620) from Mexican Supplier. During this call, Mexican Supplier stated, "They [law enforcement officers] got him [SOBERANIS-CAMPOS]." FLORES subsequently stated, "Son of a bitch! How did that happen?" Mexican Supplier replied, "I don't know how it could have happened. I guess they [law enforcement officers] followed him." FLORES stated, "So then he [SOBERANIS-CAMPOS] was being watched [by the police], because when we were there [delivering the money for the drugs], everything was quiet. He left and I left, and everything was fine. I guess it [the surveillance of SOBERANIS-CAMPOS by police] happened as soon as he got to his house." FLORES subsequently stated, “So, then it must have been him [police were watching SOBERANIS-CAMPOS] because they didn’t follow me and when I went to get that [money] over there or when I went to drop it [money] off [to SOBERANIS-CAMPOS] . . . nothing, everything was calm [no police presence].” FLORES asked, “Did he [SOBERANIS-CAMPOS] have any problems [with the police], cousin?” Mexican Supplier advised, “No, man. They might have had some problems there, but he [SOBERANIS-CAMPOS] doesn’t get involved, you know? He would always send somebody [Mexican Supplier advised that SOBERANIS-CAMPOS would generally send couriers on his behalf to retrieve narcotics proceeds].” Later in this

call, Mexican Supplier stated, "You need to change the number [cellular telephone number being used by FLORES]." FLORES agreed.

c. FLORES sends HERRERA to Distribute the Three Kilograms of Heroin in New York on February 10, 2011

231. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on February 10, 2011, the FLORES DTO sent the three kilograms of heroin that FLORES had obtained from Mexican Supplier, as described above, to a customer in New York. HERRERA transported the kilograms to New York on behalf of the FLORES DTO, where law enforcement, pursuant to an investigative stop, seized the three kilograms of heroin.

232. On February 10, 2011, the day after FLORES received delivery via GARCIA of the three kilograms of heroin from Mexican Supplier, at approximately 10:45 p.m., FLORES, using Target Phone 7, placed an outgoing call (Call #568) to HERRERA. During this call, FLORES asked, "Where are you now? Did you leave from here already [to transport the three kilograms of heroin to New York] or not?" HERRERA replied, "Yes, I just left. Uh . . . we're about to enter Indiana, dude." HERRERA subsequently asked, "Hey, uh . . . do you have that other kind [unknown drug] that they took away from your buddy the other day, dude?" FLORES replied, "No, not right now. Later . . . no, not right now."

233. On February 10, 2011, at approximately 11:42 p.m., FLORES, using Target Phone 7, received an incoming call (Call #570) from HERRERA. During this call, FLORES stated, "Hopefully, you arrive safely [to New York with the heroin] to your vacation. When you are in your

five star hotel, call me to see how you arrived [to New York with the heroin].” HERRERA remarked, “That’s fine.”

234. On February 11, 2011, at approximately 10:45 a.m., FLORES, using Target Phone 7, placed an outgoing call (Call #574) to HERRERA. During this call, HERRERA stated, “We are still here driving, man. We are like six hours away [from New York].” FLORES asked, “Like three hours?” HERRERA stated, “Six.” FLORES asked, “Like six [hours]?” HERRERA confirmed, “Yeah. Six.” FLORES asked, “Did you stop to sleep somewhere, or what?” HERRERA replied, “No, no, we haven’t stopped at all, man.” FLORES responded, “Oh, that’s fine. Be careful then.” HERRERA stated, “Yeah, I will give you a call once we arrive [to New York].”

235. On February 11, 2011, beginning at approximately 3:00 p.m. EST, New York surveillance observed the following: (a) a dark-colored BMW, bearing Illinois license plate E173726,²⁶ parked in the area of Center Drive and Parsons Boulevard, Queens, New York, with two males, later identified as HERRERA and Individual I, sitting in the vehicle; (b) approximately ten minutes later, a grey Honda Civic, occupied only by a driver, entered the College Point shopping mall parking lot in Queens, New York, and moments later, the dark-colored BMW entered the same parking lot; (c) the BMW and Honda Civic then departed this parking lot in tandem; (d) a short time later, the BMW and Honda Civic parked in the 8400 block of 86th Street, Queens, New York, where HERRERA and Individual I exited the BMW and entered the Honda Civic, and the Honda Civic occupied by the driver, HERRERA and Individual I, departed the area.

²⁶On January 3, 2011, law enforcement officers in Chicago observed FLORES and HERRERA enter the dark-colored BMW, bearing Illinois license plate E173726, which was parked in the 2300 Block of North Mango Avenue, Chicago, Illinois. A license plate inquiry revealed that Illinois registration E173726 is registered to 2128 North Bingham, Chicago, Illinois, the same address that appears on HERRERA’s Illinois driver’s license.

236. On February 11, 2011, beginning at approximately 4:30 p.m., New York surveillance observed HERRERA and Individual I walk towards the BMW, and HERRERA entered the front passenger side door of the BMW and Individual I entered the driver's seat of the vehicle. At this time, law enforcement officers approached the vehicle, identified themselves and asked for identification. HERRERA provided an Illinois driver's license under his name. Law enforcement officers asked HERRERA and Individual I if the BMW contained any drugs, and both HERRERA and Individual I responded that there were no drugs in the vehicle. Law enforcement officers then asked for permission to search the BMW, and both HERRERA and Individual I provided verbal consent to search the vehicle. Law enforcement officers patted down both individuals for safety purposes before searching the vehicle. During the pat down of HERRERA, law enforcement officers noticed that HERRERA was in possession of several bundles of money in his pockets. After a New York Police Department dog, "Caleb," trained to detect narcotics, positively alerted on the BMW for the presence of narcotics, law enforcement officers advised HERRERA and Individual I that they were seizing the vehicle for a thorough search, gave them both their personal belongings and told them that they were free to leave. At this time, law enforcement officers seized the BMW.

237. On February 14, 2011, pursuant to a search warrant, law enforcement officers conducted a search of the BMW. During a search of the vehicle, law enforcement officers located a concealed compartment in the BMW, which contained six clear teal colored brick-shaped objects and one opaque brick-shaped object. The brick-shaped objects were sent to a DEA laboratory, where they were analyzed by an expert in forensic chemistry, and determined to consist of 3,540 grams of a mixture containing heroin. On February 17, 2011, law enforcement officers conducted

an inventory search of the vehicle and seized miscellaneous documents in the name of multiple individuals, including HERRERA.

238. FLORES relied upon HERRERA to assist in distributing large quantities of narcotics for the FLORES DTO on other occasions, as well. For example:

(a) On December 27, 2010, at approximately 2:05 p.m., FLORES, using Target Phone 5, had a conversation with HERRERA (Call #143), in which HERRERA asked, “what’s up with the other black guy [drug customer]? He’s not taking any of that out [buying any of the narcotics] or what, man?” FLORES responded, “Yes, but that guy is slow as shit. He barely took half [of a quantity of narcotics] and they are rushing me over there [Mexico is pressuring FLORES to sell the narcotics].”

(b) Immediately after this call, at approximately 2:06 p.m., FLORES, using Target Phone 5 (Call #144), told HERRERA, “I need, I need you to tell me that’s for sure, that you are going to have it [narcotics] over here [in Chicago]. You have to tell me that’s for sure, if you are going to have it [narcotics]. They [Mexican source] are calling me from over there [Mexico], they are putting pressure on me from over there, too.”

(c) A minute later, FLORES, using Target Phone 5 (Call #145) told HERRERA, “They are on my ass [pressuring] down there [Mexico] about that shit [distributing narcotics]. They’re [Mexican source of supply] asking me what’s up, if I have moved that [distributed the narcotics] and they want to see what’s going on because I took too long [to distribute the narcotics] already.”

(d) Approximately 2 minutes later, at approximately 2:09 p.m., (Call #146), FLORES, using Target Phone 5, had a telephone conversation with HERRERA, in which

HERRERA stated, "Depending on the price [of the narcotics], that [HERRERA distributing narcotics] depends on the price, dude. Because I'm telling you, the other thing, dude. I have to put two hundred on it [add \$200 to the price of the narcotics] so I can make some profit from it [selling the narcotics], dude. And if I can't put something on it [add in my own fee to the narcotics transaction] to make some profit, then nothing can be done [HERRERA would not distribute narcotics], dude. If . . . it depends on the price, dude, even if its low dude. If the price its fine, that can be moved [the narcotics can be distributed], that's not a problem dude." FLORES responded, "Yeah, but what happens its that this guys [suppliers] want it [money] right now. I mean, since its been some time on this. That's why they [source of supply in Mexico] want to know what's up, if its [money] ready or what?" HERRERA stated, "I was going to go over there [to Mexico to check on the narcotics] after New Years . . ." FLORES responded, "yeah, I told you that since before for you to look into it, so you could tell me what's up. You never told me anything." Subsequently, FLORES stated, "I want you to look at it [the narcotics] good, to see it. That's why I gave you that [money to go look at the narcotics in Mexico]." HERRERA responded, "yeah, well, what Flaco [a narcotics associate] gave to this guy, he told him it was . . .that it [quality of narcotics] was good. But the note gets down very quick [the high from the narcotics does not last long] . . . the note doesn't last like the other one, dude. It lasts longer, dude, this one goes down on them right away [the high from the more recently available narcotics does not last long], dude." FLORES stated, "I saw it [narcotics] and it was good [quality], it was good to me [it appeared to be high quality]. But I don't know . . . I saw it good, very good. Like what I always give you [same narcotics], like that." HERRERA responded, "Yeah, that's what I'm saying. It look very good, but . . the note

would go down on them right away, that it would hit them, they would feel it and all, but the note would go down on them really fast [the high would not last], dude. “

(e) On January 4, 2011, at 4:51 p.m., FLORES, using Target Phone 5 (Call # 462), received an incoming call from HERRERA, in which HERRERA asked, “What’s going on with that [narcotics], are, are you going to give it [narcotics] to me to take it [to distribute elsewhere, possibly in New York] or what’s up?” FLORES responded, “Look, I couldn’t get a hold of this guy [unknown associate].” HERRERA subsequently stated, “If you’d like to bring it [narcotics] to me, call me. . . or tell me and I’ll let you know when I get back.” FLORES responded, “Okay, I think its [narcotics] going to stay here, because I don’t, don’t have authorization for that [to release the narcotics to HERRERA] yet. So I think its [narcotics] going to stay [with FLORES]. We’ll see what’s up next time.” HERRERA responded, “Okay, that’s fine, whichever way you decide. Give me something [narcotics] if you want, whatever you want to give me so I can take [for distribution elsewhere], if not, that’s fine, it’ll have to be next time.” FLORES replied, “Yes next time. . . because I can’t this time. . . I think it’ll be for next time. Everything will be under control by then, okay?” HERRERA agreed.

(f) On January 22, 2011, at 7:35 p.m., FLORES, using Target Phone 7, had a conversation with HERRERA (Call # 29), in which HERRERA asked FLORES, “Did you talk to your friend [source of supply]?” FLORES responded “Look, I don’t know what problem there would have been that they didn’t call me. . . but they didn’t call me. I think I’m going to check tomorrow to see what’s going on [if the source of supply has narcotics available].” HERRERA replied, “Yeah, well, if I need to go for the money [to pay for the narcotics], I should leave early . . . it is early, I can go get the money early, you know?” Later in the conversation, HERRERA

stated, "I was just going to go over there to go get the money [to pay for the narcotics] and I was going to come back, dude, and then I would leave. But I wanted to know what was up [when they were getting the narcotics]." FLORES responded, "No, this guy [the source of supply] have not answered me. Hold on, I'm going to make a call over there [Mexico], alright?" HERRERA replied, "Alright, give me . . . call me back, then, dude."

3. THE FLORES DTO Distributes Two Kilograms of Cocaine to the BLOUNT-BRIDGES DTO on February 18, 2011

239. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on February 18, 2011, the FLORES DTO distributed two kilograms of cocaine to the BLOUNT-BRIDGES DTO, in a deal brokered by ACEVEDO-MARCHAN. FLORES and ACEVEDO-MARCHAN delivered the cocaine to BRIDGES on the south side of Chicago, in two deliveries. During the first delivery, which occurred in the morning, FLORES and ACEVEDO-MARCHAN delivered a half kilogram of cocaine to BRIDGES in the presence of BRIDGES' customer, collected the money and left. Subsequently, law enforcement made a traffic stop on BRIDGES' customer and seized approximately 500 grams of cocaine. That afternoon, FLORES and ACEVEDO-MARCHAN returned to BRIDGES' residence, and delivered another 1 ½ kilograms of cocaine to BRIDGES.

240. On February 17, 2011, at approximately 11:40 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3258) from BRIDGES. During this call, ACEVEDO-MARCHAN stated, "Hey, I'm set [ACEVEDO-MARCHAN has narcotics to distribute]." BRIDGES replied, "Good. On both [heroin and cocaine]?" ACEVEDO-MARCHAN responded, "On the white girls [kilograms of cocaine] . . . I got a bunch of them [kilograms of

cocaine]. One, two or three [kilograms of cocaine].” BRIDGES asked, “A whole one [one kilogram of cocaine]?” ACEVEDO-MARCHAN confirmed, “Yeah.” BRIDGES asked, “On both [heroin and cocaine]?” ACEVEDO-Marchan replied, “Uh. . . on the . . . but, I need a whole one [kilogram], man. On the ones [narcotics] you are always talking about, you know? The ones [narcotics] that always work. It has to be a whole [one kilogram] one man, not half [$\frac{1}{2}$ kilogram], not a hundred [100 grams], nothing like that, you know what I mean?” ACEVEDO-Marchan later explained, “Because I can order you some [heroin] from the other. . . from over there [different source of supply] and get you. . . but you have to get rid of those mother fuckers, man. No matter how it [heroin] comes, man, because they are going to send us the best [quality]. If you don’t like them . . . they are going to send them [heroin] to me, how the fuck am I going to get rid of them? If you are going to help me out . . . if you don’t like it, you have to get rid of them [heroin] one way or another, man. You know what I mean? That’s why I don’t order any more [heroin].” BRIDGES explained, “The thing of it is this. I can get rid of it [heroin]. It isn’t a problem, shit But you know, but you know how we were getting it. We were selling it to people like that . . . giving it [narcotics] to people [customers] like that.” ACEVEDO-Marchan stated, “I can order them [heroin] right now and bring them to me . . . this Friday coming up.” BRIDGES asked, “Until Friday?” ACEVEDO-MARCHAN responded, “Yeah, but on the white girls [kilograms of cocaine]. I already got them [kilograms of cocaine].”

241. On February 17, 2011, at approximately 12:08 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3262) from BRIDGES. During this call, BRIDGES stated, “I might need like two and a half [$2\frac{1}{2}$ kilograms of cocaine].” ACEVEDO-MARCHAN replied, “Okay. How much [cocaine]?” BRIDGES confirmed, “Two whole ones [two kilograms of cocaine] and a half [$\frac{1}{2}$ kilogram of cocaine].” BRIDGES also asked, “They’re

[kilograms of cocaine] 28 [\$28,000], right?" ACEVEDO-MARCHAN confirmed the price. Based on my experience, the price is consistent with the price for a kilogram of cocaine.

242. On February 17, 2011, at approximately 3:25 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3285) from FLORES, who was using Target Phone 9. During this call, FLORES asked, "So then what? Is your friend [BRIDGES] ready?" ACEVEDO-MARCHAN replied, "Yup." FLORES asked, "The one that . . . two girls [two kilograms of cocaine]?" ACEVEDO-MARCHAN responded, "Uh-huh." FLORES then stated, "And the other [BLOUNT] said four girls [four kilograms of cocaine]?" ACEVEDO-MARCHAN again replied, "Uh-huh." FLORES stated, "Okay, alright then. I'm here with my friend [cocaine source of supply] right now." ACEVEDO-MARCHAN stated, "Okay. Cut it [mix/dilute the cocaine] well. Grab three [three kilograms of cocaine] to be sure, okay?" FLORES responded, "Alright then."

243. On February 17, 2011, at approximately 4:37 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3294) from BRIDGES, who told ACEVEDO-MARCHAN that BRIDGES' customers were still getting their money together. A few minutes later, ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3295) from FLORES, who was using Target Phone 9. During this call, ACEVEDO-MARCHAN stated, "He [BRIDGES] already called me right now. He [BRIDGES] said he's getting the money [to purchase cocaine] together. He said to give him half an hour. If he doesn't get it all together in half an hour, we'll do it [deliver the cocaine to BRIDGES] early tomorrow."

244. On February 17, 2011, at approximately 10:51 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3324) from BRIDGES. During this call, they

agreed to conduct the cocaine transaction the next day, and that BRIDGES would call when his customers arrived. ACEVEDO-MARCHAN asked, "What do you need [how much cocaine]?" BRIDGES stated, "I don't know. One guy [customer] said he was still working on something, but I know it's like one and a half [1 ½ kilograms of cocaine]."

245. On February 18, 2011, at approximately 8:32 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3334) from BRIDGES. During this call, BRIDGES advised that he had customers who wanted two kilograms of cocaine, but would not be ready until the afternoon. BRIDGES further advised, "But the guy [customer] that want to borrow [purchase] the \$50 [500 grams of cocaine], he's ready now." ACEVEDO-MARCHAN asked, "Now?" BRIDGES confirmed, "He's ready right now."

246. On February 18, 2011, at approximately 11:06 a.m., surveillance observed FLORES, driving a white Toyota truck, arrive in the area of **the 1920 North Karlov Residence**. At approximately 11:12 a.m., surveillance observed FLORES and ACEVEDO-MARCHAN depart ACEVEDO-MARCHAN's residence in a white Dodge Durango.

247. On February 18, 2011, at approximately 11:36 a.m., surveillance observed a silver KIA sports utility vehicle park in front of **the 7922 South Carpenter Residence**, and, moments later, an individual identified as John Mixon ("Mixon")²⁷ exited the KIA SUV and entered **the 7922 South Carpenter Residence**.

248. On February 18, 2011, at approximately 11:53 a.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #3377) to BRIDGES. During this call, BRIDGES

²⁷The government is seeking charges against Mixon in a separate federal criminal complaint in the Northern District of Illinois.

stated, “Man, why are you sitting in the car, man? Come on. I’m looking at you.” Beginning a few minutes later, surveillance observed ACEVEDO-MARCHAN’s white Dodge Durango arrive in the area of **the 7922 South Carpenter Residence**, and both ACEVEDO-MARCHAN and FLORES exited the Dodge Durango. ACEVEDO-MARCHAN then reached into the rear passenger side door of the Dodge Durango and retrieved a white cereal box, and FLORES and ACEVEDO-MARCHAN entered **the 7922 South Carpenter Residence**.

249. On February 18, 2011, beginning at approximately 11:58 a.m., surveillance observed the following: (a) Mixon exited **the 7922 South Carpenter Residence** and, while Mixon was standing on the front porch, Mixon placed a brown bag in the left pocket of his hooded sweatshirt; (b) Mixon re-entered the KIA SUV and departed the area; (c) a short time later, ACEVEDO-MARCHAN and FLORES exited **the 7922 South Carpenter Street Residence**, re-entered the Dodge Durango and departed the area; and (d) a few minutes later, the Dodge Durango entered the alley behind **the 7922 South Carpenter Residence** and parked in the rear of the residence.

250. On February 18, 2011, beginning at approximately 12:05 p.m., surveillance observed the KIA SUV park in the area of 8330 South Kerfoot Avenue; moments later, Mixon exited the KIA SUV, looked directly at an officer on foot surveillance, and then quickly re-entered the KIA SUV, departing at a high rate of speed. A short time later, surveillance initiated an investigative stop on the KIA SUV. After Mixon eventually stopped, law enforcement officers observed Mixon’s right hand at his waistband area. A law enforcement officer instructed Mixon to show his hands, at which time Mixon complied and raised both of his hands in the air. A protective pat down of Mixon revealed a brown bag in Mixon’s waistband. Inside the brown bag, law enforcement officers discovered a white powdery substance. The substance was sent to a DEA laboratory, where it was

analyzed by an expert in forensic chemistry, and determined to consist of 497.5 grams of a mixture containing cocaine.

251. On February 18, 2011, at approximately 2:11 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3396) from BRIDGES. During this call, BRIDGES stated, "Well, I will want you to come here [BRIDGES' residence] because . . . on top of that, things [amount of cocaine] have gotten bigger." ACEVEDO-MARCHAN asked, "Yeah?" BRIDGES replied, "It's [cocaine transaction] going to be more money. Yeah. That means more money for you." ACEVEDO-MARCHAN asked, "Okay. What you need [how much cocaine]?" BRIDGES responded, "Right now it's uh . . . one and a half [1 ½ kilograms of cocaine]." ACEVEDO-MARCHAN asked, "You got the cash?" BRIDGES replied, "Waiting on this one guy [customer] to call." ACEVEDO-MARCHAN remarked, "Okay."

252. On February 18, 2011, at approximately 3:08 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #3403) to FLORES, who was using Target Phone 9. During this call, ACEVEDO-MARCHAN stated, "Uh . . . the black guy [BRIDGES] called already. He [BRIDGES] wants us to take him the rest [other half kilogram of cocaine left over from the earlier delivery that day]." FLORES replied, "Later on." ACEVEDO-MARCHAN reiterated, "The rest . . . the rest that was left [half kilogram of cocaine in FLORES' possession]." FLORES replied, "Okay." ACEVEDO-MARCHAN then stated, "Look, he [BRIDGES] told me to wait. We'll wait like 20 minutes more, 30, because he [BRIDGES] may want 1 ½ [1½ kilograms of cocaine], a whole one on the side [one kilogram of cocaine in addition to the left over half kilogram of cocaine]."

253. On February 18, 2011, at approximately 3:48 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #3415) to BRIDGES. During this call, BRIDGES

stated, "You remember what my guy [BRIDGES' drug customer] said at the house, right?" ACEVEDO-MARCHAN replied, "Uh-huh." BRIDGES then stated, "Okay, that [unknown quantity of cocaine] and a dollar and fifty cents [1½ kilograms of cocaine]." ACEVEDO-MARCHAN responded, "Okay, so, uh. . . the fifty cents [½ kilogram of cocaine]." BRIDGES stated, "Right, and the dollar [one kilogram of cocaine]." ACEVEDO-MARCHAN replied, "So that's one-fifty [1 ½ kilograms of cocaine], right?" BRIDGES responded, "Right, and what my guy [BRIDGES' drug customer] asked for [unknown quantity of cocaine]." ACEVEDO-MARCHAN asked, "You got . . . you ready?" BRIDGES replied, "Yeah, everybody, they waiting."

254. On February 18, 2011, at approximately 3:51 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #3417) to FLORES, who was using Target Phone 9. During this call, ACEVEDO-MARCHAN stated, "Remember, I want the peso and a half [1 ½ kilograms of cocaine], okay?" FLORES replied, "Peso and a half [1 ½ kilograms of cocaine]." ACEVEDO-MARCHAN then stated, "And remember also about the black guy [BRIDGES' drug customer] that I told you was there?" FLORES stated, "Uh-huh." ACEVEDO-MARCHAN stated, "He [BRIDGES' drug customer] wanted two of those girls [undetermined quantity of cocaine]." FLORES asked, "Also?" ACEVEDO-MARCHAN replied, "Yes. Might as well bring them [cocaine] so I can give them to him [BRIDGES' drug customer] there. Bring three of those [undetermined quantity of cocaine]. I'll stay with the rest of it [cocaine]." FLORES asked, "Three of those [undetermined quantity of cocaine]?" ACEVEDO-MARCHAN replied, "Uh-huh. Three of those [undetermined quantity of cocaine] and the peso and a half [1 ½ kilograms of cocaine]." FLORES replied, "Alright then."

255. On February 18, 2011, at approximately 4:12 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3421) from FLORES, who was using Target Phone 9. During this call, ACEVEDO-MARCHAN asked, "Dude, we should see the tickets [money] first, right? So we can go in and out [of BRIDGES' residence]. What do you think?" FLORES replied, "Yes, it's fine. Some guy is going to take me over there [to BRIDGES' residence]. The guy that I told you that is really cool. He is going to take me over there [to BRIDGES' residence]. You should go over there while I'm here doing this [obtaining the cocaine]. Go over there [to BRIDGES' residence] so you can check that [money] out."

256. On February 18, 2011, at approximately 5:17 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3441) from FLORES, who was using Target Phone 9. During this call, FLORES asked, "Are you there [BRIDGES' residence]?" ACEVEDO-MARCHAN stated, "I'll be there soon, I'm about ten minutes away." FLORES subsequently stated, "Tell him [BRIDGES] since I'm going over there [to BRIDGES' residence], tell him it's . . . he is going to give me more [money], okay?" FLORES replied, "I'll tell him [BRIDGES], I'll tell him." FLORES then stated, "Tell him [BRIDGES] that for everything [the total quantity of cocaine] it's 500 [\$500] more, okay?" ACEVEDO-MARCHAN replied, "Okay, I'll tell him [BRIDGES]."

257. On February 18, 2011, at approximately 5:59 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3453) from FLORES, who was using Target Phone 9. During this call, FLORES stated, "I have the three small ones [undetermined quantity of cocaine], okay?" ACEVEDO-MARCHAN replied, "Come over here [to BRIDGES' residence]. We'll talk here." FLORES asked, "Is it [the purchase money] ready or not?" ACEVEDO-MARCHAN replied,

"Yeah, it [purchase money] is ready. The big stuff [money to purchase the 1 ½ kilograms] is here. Get over here [BRIDGES' residence]. We'll talk here." ACEVEDO-MARCHAN also asked, "Where are you?" FLORES replied, "I'm here [near BRIDGES' residence]." ACEVEDO-MARCHAN stated, "Just knock. You know what house it is?" FLORES responded, "Yeah, I know. I'm pulling in now." ACEVEDO-MARCHAN asked, "Where are you pulling in to?" FLORES stated, "To the street [Carpenter]." ACEVEDO-MARCHAN replied, "Okay, okay. Go around, my car is the green one on the corner. Get out and come in fast and I'll open the door." I believe that at this time, FLORES delivered the additional 1 ½ kilograms of cocaine to BRIDGES, and picked up the money for the cocaine.

258. On February 18, 2011, at approximately 6:18 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #3456) to FLORES, who was using Target Phone 9. During this call, ACEVEDO-MARCHAN stated "He [BRIDGES] said that he will give you the other 2 ½ tomorrow and uh. . . he wants another . . . because he wants another two pesos for tomorrow [BRIDGES wants another two kilograms of cocaine the next day]." FLORES responded, "All right then." ACEVEDO-MARCHAN stated, "Either way, I'll take it out right now. If not I'll call you to see what's up, okay?" FLORES responded, "And tell him [BRIDGES] that there was 50 pesitos [monetary amount] missing from that [money that BRIDGES gave to ACEVEDO-MARCHAN and FLORES for the purchase of 1 ½ kilograms of cocaine]." ACEVEDO-MARCHAN responded, "Yes, he [BRIDGES] called me right now and said that the dude [customer] was short. So, it's going to be three [monetary amount], okay?" FLORES asked, "Three [monetary amount] tomorrow?" ACEVEDO-MARCHAN stated, "Yeah, for those two [two additional kilograms of cocaine]." FLORES remarked, "Alright, then." Later, FLORES asked, "Are you on

your way back [from BRIDGES]?” ACEVEDO-MARCHAN replied, “I took the expressway.” FLORES replied, “Me, too.”²⁸

C. GERARDO HERNANDEZ-FLORES CONSPIRACY

GERARDO HERNANDEZ Fronts a Kilogram of Heroin to FLORES to Sell to BLOUNT on March 27, 2011

259. Based on the intercepted wire communications, I believe that on March 27, 2011, GERARDO HERNANDEZ fronted a kilogram of heroin to FLORES for distribution. FLORES delivered the kilogram of heroin to ACEVEDO-MARCHAN, who then distributed it to BLOUNT. BLOUNT partially paid for the heroin, but then demanded his money back, because he did not like the quality.

260. On March 27, 2011, at approximately 12:03 p.m., FLORES, who was using Target Phone 9, received an incoming call (call #764) from ACEVEDO-MARCHAN, who was using Target Phone 6. During this call, ACEVEDO-MARCHAN stated, “I’m here with my buddy [BLOUNT] and he has the money [to purchase one kilogram of heroin].” FLORES replied, “I’m waiting for 1:00 [p.m.], okay?” ACEVEDO-MARCHAN asked, “But it is for sure?” FLORES responded, “Yeah, I’ll see you at 1:00 [p.m.] there. A little half [$\frac{1}{2}$ kilogram of heroin], or everything [one kilogram of heroin]?” ACEVEDO-MARCHAN replied, “Everything [one kilogram of heroin].” FLORES stated, “Look, maybe we’ll just do [sell] a half [$\frac{1}{2}$ kilogram of heroin] and

²⁸Approximately five minutes after calling FLORES, ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #3464) from ANGEL HERNANDEZ. During this call, ACEVEDO-MARCHAN told ANGEL HERNANDEZ “I just left two [kilograms of cocaine] with the black guy [BRIDGES].” ANGEL HERNANDEZ responded, “Don’t bull shit [lie], seriously?” ACEVEDO-MARCHAN responded, “Yeah, dude! Just came from there.” (Evidence of ANGEL HERNANDEZ’s own narcotics violations is set forth below, at ¶¶307-334.)

we'll see what's up?" ACEVEDO-MARCHAN replied, "But if you can do the whole thing [one kilogram of heroin], he [BLOUNT] has the money here." FLORES replied, "Okay."

261. On March 27, 2011 at approximately 2:09 p.m., FLORES, who was using Target Phone 9, received an incoming call (Call #769) from GERARDO HERNANDEZ, who was using Target Phone 11.²⁹ During this call, FLORES asked, "Do you remember the 'thing' [a kilogram of heroin] that you brought me the other time?" Do you remember?" GERARDO HERNANDEZ stated, "Yes, yes." FLORES continued, "I wanted one [kilogram of heroin] exactly the same like that." GERARDO HERNANDEZ replied, "Look, what if I check it [the quality of the heroin]?"

²⁹The identification of GERARDO HERNANDEZ and his voice in this Affidavit is based in part on the following: On April 5, 2011, this Court authorized DEA to install and use a pen register and trap and trace device, along with requested location information (also known as GPS "pings"), for Target Phone 11, used by a person referred to in telephone conversations as "Chaparro." The GPS pings from April 5, 2011, to April 8, 2011, revealed that the user of Target Phone 11 resided in the area of 1812 South 50th Court, Cicero, Illinois. On April 8, 2011, law enforcement officers conducted surveillance at this residence and observed GERARDO HERNANDEZ exit the residence, and enter a tan GMC Jimmy. Law enforcement officers then followed Gerardo HERNANDEZ for almost two hours, during which time the GPS pings of Target Phone 11 tracked the same locations as surveillance observed Gerardo HERNANDEZ. At approximately 2:15 p.m., members of the Berwyn Police Department ("BPD") conducted a traffic stop of the tan GMC Jimmy for failure to obey a stop sign, and identified the driver as GERARDO HERNANDEZ; the only other occupants of the vehicle were a female believed to be the wife of GERARDO HERNANDEZ, and a small child. HERNANDEZ was subsequently arrested for failing to possess a valid driver's license and for a previous traffic warrant. Subsequent to this arrest, law enforcement officers conducted a fingerprint scan of Gerardo HERNANDEZ, which revealed a previous criminal history under the same name. Furthermore, during an intercepted call on April 21, 2011 at approximately 5:57 p.m. (Call # 176), the user of Target Phone 11 referred to himself as "It's me, Gerardo", and later in the call, he stated, "My wife's name is Carolina." Again on April 21, 2011, at approximately 6:06 p.m. the user of Target Phone 11 stated, "This is Gerardo again . . ." Finally, on April 21, 2011, based on intercepts over Target Phone 11, law enforcement officers conducted surveillance of GERARDO HERNANDEZ in anticipation of a narcotics deal; at some point during the surveillance, the user of Target Phone 11 described in telephone conversations over Target Phone 11 the surveillance vehicles and also the locations where he had spotted the surveillance vehicles. Monitors have compared the voice of the user of Target Phone 11 during surveillance of GERARDO HERNANDEZ with the voice of the user of Target Phone 11 in other intercepted calls, and determined that they are the same person. Based on all of the above information, law enforcement officers have identified GERARDO HERNANDEZ as the user of Target Phone 11. In the summaries of the intercepted calls in this Affidavit in which GERARDO HERNANDEZ is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to GERARDO HERNANDEZ in each of these summaries is the same.

Right now I'll tell the man [the heroin source of supply] to get it [the kilogram of heroin] close to me over here and I'll check it, or if you want me to take it, I don't know where, so you can check it." FLORES stated, "Uh-huh, there with my buddy [FLORES' narcotics associate] is fine. Call me when you're around there." GERARDO HERNANDEZ replied, "Alright then."

262. On March 27, 2011, at approximately 2:52 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, received an incoming call (Call #6753) from BLOUNT. BLOUNT asked ACEVEDO-MARCHAN what was going on and ACEVEDO-MARCHAN replied, "He just called [FLORES] already. How do we want to do it [heroin transaction]?" BLOUNT replied, "You gonna come to Gabe's [BRIDGES]." ACEVEDO-MARCHAN responded, "Yeah, as soon as I get . . . soon as it [heroin] comes to my house, I'll leave, okay? And I'll call you."

263. On March 27, 2011, at approximately 3:51 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, made an outgoing call (Call #6755) to BRIDGES. ACEVEDO-MARCHAN stated, "I already got it [heroin] from him [FLORES]." BRIDGES asked, "This [heroin] ain't [from] your uncle [Acevedo-Fitz]?" ACEVEDO-MARCHAN replied, "No. This [heroin] Arturo's [FLORES]." BRIDGES replied, "Oh, fuck him. I don't want that [heroin]. Did he [BLOUNT] see it [heroin]?" ACEVEDO-MARCHAN replied, "No . . . it's [heroin] good [quality]."

264. On March 27, 2011, at approximately 3:57 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, received an incoming call (Call #6756) from FLORES, who was using Target Phone 9. During the call, FLORES told ACEVEDO-MARCHAN, "My buddy [GERARDO HERNANDEZ] is almost here." ACEVEDO-MARCHAN asked, "How should we do it [narcotics transaction]? He [BLOUNT] doesn't want to come back because he already came in the morning." FLORES responded, "You see, that bullshit should not be done." ACEVEDO-MARCHAN

responded, “He [BLOUNT] has the money [for the heroin] there, dude. Let me call him [BLOUNT] to see if he’ll come [to ACEVEDO-MARCHAN’s residence] okay?” FLORES agreed.

265. On March 27, 2011, at approximately 4:18 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, received an incoming call (Call #6761) from FLORES, who was using Target Phone 9. ACEVEDO-MARCHAN asked FLORES, “Is it [heroin] all set?” FLORES replied, “It’s [heroin] all set. It’s [heroin] in my hands already.” FLORES asked ACEVEDO-MARCHAN, “What are we doing?” ACEVEDO-MARCHAN replied, “I’ll count everything [money] and you follow me once it’s [money] ready.” FLORES replied, “Alright, call me right away.”

266. On March 27, 2011, at approximately 6:11 p.m., FLORES, who was using Target Phone 9, received an incoming call (Call #790) from GERARDO HERNANDEZ, who was using Target Phone 11. During this call, GERARDO HERNANDEZ asked, “Did the car pass the emission test [GERARDO HERNANDEZ asked if FLORES was satisfied with the quality of heroin]?” FLORES replied, “Look, I just took it there [to ACEVEDO-Marchan’s residence] to have the test done, and uh . . . they [ACEVEDO-MARCHAN and BLOUNT] are doing it [testing the quality of the heroin]. I only brought him a bit [a sample of heroin] like you told me. So they [ACEVEDO-MARCHAN and BLOUNT] are going to let me know [if they are satisfied with the heroin] in a little while.” GERARDO HERNANDEZ replied, “That’s fine, sir.” FLORES continued, “Look, and besides that if this [transaction involving the kilogram of heroin] comes out fine, later we can do the other one [distribute an additional kilogram of heroin].” GERARDO HERNANDEZ responded, “Oh, alright.”

267. Shortly after this call, BLOUNT was intercepted in a series of calls with ACEVEDO-MARCHAN, who was using Target Phone 6, in which BLOUNT gave directions to ACEVEDO-MARCHAN, in order to deliver the kilogram of heroin to BLOUNT at his residence.

268. On March 27, 2011, at approximately 7:36 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, made an outgoing call (Call #6797) to BRIDGES. ACEVEDO-MARCHAN told BRIDGES, "I'm right here with Mingo [BLOUNT], man. He's [BLOUNT] missing 13 grand [\$13,000]." BRIDGES did not hear, causing ACEVEDO-MARCHAN to repeat, "Oh yeah, ten [\$10,000], yeah. He's missing 10 [\$10,000]. But that's [heroin] the good shit [high quality heroin]. You want to keep [purchase] the rest, 'cause I don't want to cut it [divide the heroin into smaller portions], man." BRIDGES asked ACEVEDO-MARCHAN, "What's that got to do with me?" ACEVEDO-MARCHAN responded, "You want to keep them [heroin]? It's good shit [quality] bro." BRIDGES asked, "Do I want to keep them [heroin]?" ACEVEDO-MARCHAN stated, "Yeah, cause I need the money, man." BRIDGES asked, "Where they [heroin] at?" ACEVEDO-MARCHAN advised, "I'm right here with Mingo [BLOUNT]." Later in the call, ACEVEDO-MARCHAN reiterated, "He's [BLOUNT] missing 10,000 [\$10,000]." BRIDGES asked, "He's [BLOUNT] missing it [money]?" ACEVEDO-MARCHAN replied, "Yeah, he [BLOUNT] don't got enough. That's why. He [BLOUNT] want me to cut it [divide the heroin into smaller portions], but I can't do that because, you know. I already got the whole thing [kilogram of heroin] over here. I don't want to go back [give the heroin back to FLORES] with that shit." BRIDGES asked, "So, what you want me to do?" ACEVEDO-MARCHAN asked, "You don't want to keep the rest [of the heroin]?" BRIDGES asked, "You want me to keep it [heroin]?" ACEVEDO-MARCHAN remarked, "Yeah." BRIDGES stated, "Alright, well, bring it [heroin] over then." Later in the call,

BRIDGES stated, "Yeah, just leave it [heroin] there." ACEVEDO-MARCHAN stated, "I'm going to give you a whole one [one kilogram of heroin], okay? He's [BLOUNT] missing 10,000 [\$10,000], so it's up to you." BRIDGES asked, "He's [BLOUNT] missing 10,000 [\$10,000]?" ACEVEDO-MARCHAN stated, "Yeah, okay? Cause I don't want to cut it [break down the heroin into smaller quantities], okay?" BRIDGES asked, "So, how many [how much heroin] is it?" ACEVEDO-MARCHAN advised, "It's [heroin] good shit, bro." BRIDGES remarked, "Yeah, okay. Alright, man."

269. On March 27, 2011, at approximately 8:19 p.m., FLORES, who was using Target Phone 9, placed an outgoing call (Call #793) to ACEVEDO-MARCHAN, who was using Target Phone 6. During this call, ACEVEDO-MARCHAN stated, "Look, this guy [BLOUNT] can't put it [the money needed to purchase the heroin] together. He [BLOUNT] already gave me the money. It [the money] is missing some, but I'm going to take it anyway if he doesn't complete everything. Or, do we leave it [the heroin transaction] for tomorrow morning?" FLORES replied, "Oh, these fucking guys." ACEVEDO-MARCHAN continued, "I already have 53 [\$53,000]. He already gave me 53 [\$53,000]. I have it [the money] right here, okay? I'm waiting for the rest [of the money needed to purchase one kilogram of heroin] to arrive. If you want, I'll knock off what he's missing [ACEVEDO-MARCHAN will remove a portion of the heroin being sold to BLOUNT to account for the missing money]. Or, do we wait until tomorrow [to conduct the transaction]? What do you think?" FLORES responded, "I don't know, what do you think?" ACEVEDO-MARCHAN replied, "I'm going to wait another half hour. I have 53 [\$53,000] with me. There is no problem anyway, They [BLOUNT] will give me the money [the remainder of the money needed to purchase the kilogram of heroin] early tomorrow." FLORES stated, "Alright then." Based on my experience,

the amount of money that ACEVEDO-MARCHAN and FLORES discussed is consistent with a kilogram of heroin.

270. On March 27, 2011, at approximately 8:56 p.m., FLORES, using Target Phone 9, received an incoming call (Call #794) from GERARDO HERNANDEZ. During this call, FLORES stated, "Everything is fine, don't worry about it. Do you need that [money for the kilogram of heroin] today or tomorrow?" GERARDO HERNANDEZ replied, "Uh, look. What happened is, I told the guy [heroin source of supply] that [the money] was already there, and he told me that if it [the drug money] was ready, I should bring that over. So, I said, 'Alright.' I don't know if you want to swing by?" FLORES replied, "I had sent that [heroin]. I am not with the friend [ACEVEDO-Marchan]. I sent it [the heroin], but everything is fine [the money will be forthcoming]. Let me see where these friends [ACEVEDO-MARCHAN and BLOUNT] are at, okay?" GERARDO HERNANDEZ replied, "Alright then."

271. Approximately a minute later, ACEVEDO-MARCHAN, who was using Target Phone 6, received an incoming call (Call #6810) from FLORES, who was using Target Phone 9. FLORES asked ACEVEDO-MARCHAN, "What's up, where are you?" ACEVEDO-MARCHAN responded, "The chubby one [BLOUNT] told me to go tomorrow morning and he'll give me the money. I have your 53 [\$53,000] here." FLORES told ACEVEDO-MARCHAN, "The thing is these friends [source of supply] are waiting for me for that [money]." ACEVEDO-MARCHAN replied, "Go to my house . . . I'm on my way over there now." FLORES agreed.

272. On March 27, 2011, at approximately 9:19 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, received an incoming call (Call #6813) from BLOUNT. During the call, BLOUNT told ACEVEDO-MARCHAN, "Man, dude fucked around [with the heroin], get that

money back.” ACEVEDO-MARCHAN responded, “Oh, so tomorrow?” BLOUNT responded, “No, he’s [FLORES] gonna need to give my mother fucking money back. This ain’t it [good quality], that’s why I told you . . .” ACEVEDO-MARCHAN responded, “But you tried it [heroin], I sent you a sample and you tried it. What are we going to do now?” BLOUNT said, “He can have this [heroin] back.” BLOUNT told ACEVEDO-MARCHAN to call FLORES, and ACEVEDO-MARCHAN agreed to do so.

273. On March 27, 2011, at approximately 9:36 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #800) to GERARDO HERNANDEZ. During this call, FLORES stated, “I’m here with the friend [ACEVEDO-Marchan] . . . and there are problems [with the heroin transaction], my friend. This guy [BLOUNT] is calling to tell him [ACEVEDO-Marchan] that it [the heroin] is garbage. He [ACEVEDO-Marchan] brought me everything [money]. I have all the paper [money] here, but he [BLOUNT] just called saying it [the heroin] is garbage, and that he doesn’t want it, and he wants his thing [money] back.” GERARDO HERNANDEZ asked, “But did he [BLOUNT] handle it [the heroin] a lot or what?” FLORES responded, “No, it [the heroin] is the same.” In the background of the conversation, ACEVEDO-Marchan was heard saying, “It [the heroin] is the same. He [BLOUNT] said he opened it [the wrapping on the kilogram of heroin] and it [the heroin] is all acetone.” FLORES continued, “He [BLOUNT] says . . . that it [the heroin] is not right. He says it’s just garbage. He wants his thing [money] back, and if I had given you that [money] today, I would have gotten in trouble.” GERARDO HERNANDEZ asked, “Well, when can you give it [the kilogram of heroin] back?” FLORES replied, “I think tomorrow. Don’t worry, everything is there, the same way [FLORES indicates that no heroin has been removed from the

kilogram by BLOUNT].” GERARDO HERNANDEZ responded, “Okay, as long as it comes the way I’m telling you [the kilogram of heroin has not been tampered with], it’s no problem.”

274. On March 27, 2011, at approximately 10:24 p.m., ACEVEDO-MARCHAN, who was using Target Phone 6, made and outgoing call (Call #6834) to FLORES, who was using Target Phone 9. During the call, ACEVEDO-MARCHAN told FLORES, “He’s [BLOUNT] on his way already [to give back the heroin and take back his money]. He’s [BLOUNT] really pissed off, he said that it’s [heroin] useless and it’s garbage. He’s really mad and he wants his money [\$53,000].” FLORES later told ACEVEDO-MARCHAN, “What I want is for you to take a look at it [heroin] and see if it’s complete [the whole kilogram].”

275. On March 27, 2011, at approximately 11:31 p.m., FLORES, using Target Phone 9, received an incoming call (Call #809) from GERARDO HERNANDEZ. FLORES told GERARDO HERNANDEZ, “I have some bad news. The guy [BLOUNT] is here and he brought me the work [heroin]. He’s [BLOUNT] saying that when he took a piece [sample] from it [kilogram of heroin], he [BLOUNT] broke it [kilogram of heroin] . . . it broke in big chunks. He’s [BLOUNT] is saying that if you want to exchange it [kilogram of heroin] for another one [of better quality], you can.” GERARDO HERNANDEZ responded, “The thing is that it [heroin] needs to come back the same. It [kilogram of heroin] can’t be messed up or anything, because these guys [GERARDO HERNANDEZ’s source of supply] make a big deal out of it if I return it [kilogram of heroin] like that.” FLORES responded, “He [BLOUNT] put it [heroin] in a . . . zip lock bag.” GERARDO HERNANDEZ asked FLORES, “So did he throw away the thing . . . where the clothing [kilogram wrapper] came on.” FLORES responded, “Yes, they [BLOUNT] threw it [kilogram wrapper] out

and brought it [heroin] back like that.” GERARDO HERNANDEZ replied, “Son of a bitch. That’s going to be a problem.”

276. On March 27, 2011, at approximately 11:40 p.m., FLORES, using Target Phone 9, received an incoming call (Call #810) from GERARDO HERNANDEZ. During this call, GERARDO HERNANDEZ stated, “Look, I spoke to the guy [source of supply] and he is asking why they [BLOUNT and BRIDGES] took it [kilogram of heroin] out. He says they should’ve just got a little bit [sample] from it [kilogram] to check it out. He [source of supply] says that it was too much fucking time and that they shouldn’t have taken it [heroin] out of there [packaging] . . . He [source of supply] says, ‘So tell them that it [heroin] needs to come back with the clothing [packaging] it had on.’ He says, ‘I’ll recognize it [heroin] by the tattoo [stamp on the heroin] it has. If the tattoo [stamp] is not there, I’m not going to exchange anything [take back the heroin and return the money].’” FLORES responded, “Look, you can see the tattoo [stamp] . . . but slightly. He [BLOUNT] says that when he took it [kilogram of heroin] out of there [packaging], it broke [into pieces]. He said that when he tapped it [heroin], it completely broke. It’s [heroin] still wet and that’s why it [heroin] broke, but you can still kind of see the tattoo [stamp]. You can see the tattoo on a piece [of the heroin] . . . but you can hardly see it.” GERARDO HERNANDEZ responded, “Shit, man. The thing is that they [BLOUNT and BRIDGES] shouldn’t have taken it [heroin] out of there. They shouldn’t have taken it [heroin] out of there. They should’ve just tested it [heroin] right away. They know how things are and how they should be done. It would be another thing if they hadn’t opened it [heroin] . . . I’m going to be in trouble [with the source of supply] . . . He’s going to say, ‘Where’s the clothing [packaging]? I can’t take it [heroin] back like this [without the heroin’s original packaging].’”

277. Later during the telephone call described in the preceding paragraph:

(a) GERARDO HERNANDEZ told FLORES, “You said it [heroin transaction] was a yes and now you are telling me that it’s a no. That’s what I told the man [source of supply] when you called. He [source of supply] says, ‘What do you mean? He’s [FLORES] saying it’s a yes and now he’s saying it’s a no? Are we playing games here?’” FLORES replied, “That’s what I told this guy [ACEVEDO-Marchan]. The same thing you are telling me is what I told this guy here. I told him [ACEVEDO-Marchan] that he said it was a yes first and when he came back with the money and all . . . with the ticket [money] . . . He [ACEVEDO-Marchan] called back and said it [heroin transaction] was a no. That it [heroin] was too humid [heroin was wet, most likely from adding cutting agents to the heroin and attempts to dry and re-press the kilogram of heroin].”

(b) FLORES stated, “He [ACEVEDO-Marchan] says he just broke it [heroin] and the whole thing broke since it [heroin] was soft.” GERARDO HERNANDEZ responded, “I’m telling you that the ones [kilograms of heroin] I’ve seen are not like that. Even when you opened it [heroin] up, it was hard, you know. It [heroin] was hard. The problem is that they handled it [heroin] and at the end of it all, it [heroin] was shit. That’s fucked up.” FLORES explained, “No, it’s [heroin] big chunks that it’s in. The only thing is that it [heroin] did get a little powdery when he tapped it . . . it crumbled a little. Other than that, there’s big pieces [of heroin].”

(c) GERARDO HERNANDEZ stated, “As I was telling you, it would not be a problem if it [heroin] was the same. I would give you another one [replace the bad kilogram with another kilogram of heroin], but I already told the old man [source of supply] that they [BLOUNT and BRIDGES] had opened it and it didn’t have the . . . the dude got even more pissed off. He’s [source of supply] like, ‘These fuckers are not rookies [in the drug business]. They should know

how to do things.” FLORES advised, “I know. It happened to me once and I know, I understand. I sent that guy over with my buddy. First, he [BLOUNT] said it was a yes and when he saw that it [heroin] was still humid, he [BLOUNT] said he didn’t like it and that it was no good. He came right away. He came right now and uh . . . that’s the problem. It is the same. You are going to see the color and all. Just see the color.” GERARDO HERNANDEZ responded, “Yes, that’s not a problem. The only thing is . . . if they [BLOUNT and BRIDGES] threw that thing [packaging] away, have them bring it back so we can put it back in the wrapper [heroin packaging].” FLORES explained, “The problem is that he [BLOUNT] lives really far and he just left. The dude left and lives far.”

(d) GERARDO HERNANDEZ stated, “I’ve never gotten a complaint. You are the first one [first customer to complain about the quality of the heroin], man . . . you are the only one [complaining customer] that’s told me that [the quality of the heroin was bad]. Nobody has ever said anything.” FLORES stated, “He’s [ACEVEDO-Marchan] saying that I might be the one that got the bad luck and got the bad one [kilogram of bad quality heroin]. We’re going to continue working [distributing heroin] and are going to do things better. I feel bad. I’m also feeling bad for you, man. I understand that it’s tough.” GERARDO HERNANDEZ stated, “The problem is that now that we need to see what the old man [source of supply] says. If he doesn’t see the tattoo [stamp], it’ll be worse. It’s going to be nothing but bullshit. Try and see if he [BLOUNT] can give you the wrapper [packaging] tomorrow . . . the clothing for the girl [packaging] and uh . . . we’ll see what’s up. We’ll try and rearrange it back. I think that if it’s [heroin] not like that [original condition], the guy [source of supply] will tell me to go to hell.”

D. The TORRES-TELLEZ and TELLEZ Conspiracy

1. TORRES-TELLEZ Delivers Three Kilograms of Heroin to FLORES on April 30, 2011, and TORRES-TELLEZ and TELLEZ Obtain Payment on May 7, 2011

278. On April 27, 2011, Individual H arranged for the delivery of heroin to FLORES. On April 30, 2011, FLORES met with TORRES-TELLEZ at a Home Depot, where TORRES-TELLEZ delivered three kilograms of heroin to FLORES. FLORES told Individual H that he would pay for the heroin within eight days after delivery. On May 7, 2011, FLORES met again with TORRES-TELLEZ, and gave TORRES-TELLEZ the payment for the cocaine.

279. On April 27, 2011, at approximately 10:19 a.m., FLORES, using Target Phone 13, placed an outgoing call (Call #88) to Individual H. During this call, Individual H asked, "Do you need any of the other one [heroin] right now? I already called my friend [Individual H's source of supply]. He says they will give it [heroin] to you." FLORES asked, "Are they [the kilograms of heroin] nice [of good quality]?" Individual H replied, "The guy says they [the kilograms of heroin] are nice, but you'll see them and if you like it, fine, and if not, then no." FLORES replied, "Okay."

280. On April 29, 2011, at approximately 6:56 p.m., FLORES, using Target Phone 12, received an incoming call (Call #141) from TORRES-TELLEZ.³⁰ During the call, TORRES-

³⁰The identification of TORRES-TELLEZ and his voice in this Affidavit are based in part on the following: On May 16, 2011, officers arrested TORRES-TELLEZ in connection with the seizure of 9,774 grams of heroin, as described in ¶¶293-306, below. TORRES-TELLEZ has been charged in the Circuit Court of Cook County in connection with that seizure. During that arrest, TORRES-TELLEZ identified himself, and the arresting officers recovered a Mexican driver's license bearing his name and photo. At the time of the May 16, 2011 arrest, law enforcement officers recovered two cellular telephones from TORRES-TELLEZ, one of which was assigned telephone number (219) 746-2130, and which reflected calls to Target Phone 12. On May 17, 2011, a Spanish speaking law enforcement officer who conducted the post-arrest interview of TORRES-TELLEZ listened to intercepted calls (Call ## 141, 175, 807) over Target Phone 12 involving telephone number (219) 746-2130, and positively identified TORRES-TELLEZ as the user of telephone number (219) 746-2130. Based on all of the above information, DEA has positively identified TORRES-TELLEZ as the user of telephone number (219) 746-2130.

TELLEZ told FLORES, "I'm calling on Cuco's [unidentified drug associate] behalf." FLORES acknowledged and TORRES-TELLEZ continued, "I have some cell phones [kilograms of heroin] he had given me." FLORES asked, "Okay. Where are you?" TORRES-TELLEZ replied, "Toward the south [south side of Chicago]. Where are you?" FLORES advised, "Toward the north [north side of Chicago]." TORRES-TELLEZ asked, "Oh, could you come by here?" FLORES stated, "To be honest, I won't go out that way. Can you come up here?" TORRES-TELLEZ responded, "No, because they [kilograms of heroin] are not in the box [vehicle trap], they [kilograms of heroin] are loose. But it's cool [limited law enforcement presence in the area] where I'm at. There is a lot of families. There is no problem." FLORES advised, "To be honest, it's pretty late." TORRES-TELLEZ replied, "It is late now, but I will have time tomorrow." FLORES asked, "Where are you more or less?" TORRES-TELLEZ stated, "I'm not sure if you know 90 [I-90], the Skyway, almost by Indiana." FLORES stated, "No buddy. It's too far to go over there." TORRES-TELLEZ subsequently stated, "If you have the boxes [vehicle trap] for the cell phones [heroin] I can come meet you." FLORES responded, "I don't have any [vehicles with traps] right now. I thought it [heroin] was around here. Tell that guy [unknown associate] that I'm around Armitage [Armitage Avenue, Chicago, Illinois]." TORRES-TELLEZ replied, "Alright, I'll tell him."

281. On April 30, 2011, at approximately 11:17 a.m., FLORES, using Target Phone 12, received an incoming call (Call #159) from TORRES-TELLEZ. TORRES-TELLEZ asked, "So you think you'll be able to do it [heroin transaction] if I swing by later on to pay you a visit?" FLORES replied, "Yes, what time would you be coming over?" TORRES-TELLEZ replied, "Later on. Maybe around 4:00 [p.m.]." FLORES asked, "Man, you can't do it [heroin transaction] sooner?" TORRES-TELLEZ advised, "I'm busy." TORRES-TELLEZ then asked, "What time were you

thinking about?” FLORES stated, “A little earlier. Just so it won’t be that late. Three [p.m.] would be fine.” TORRES-TELLEZ stated, “I’m going to try for three [p.m.] . . . hopefully I can make it to the house at a decent time and I’ll head over there.” FLORES confirmed, “Okay.” TORRES-TELLEZ stated, “I’ll give you a call once I’m heading out.”

282. On April 30, 2011, at approximately 1:55 p.m., FLORES, using Target Phone 12, received an incoming call (Call #169) from TORRES-TELLEZ. During the call, TORRES-TELLEZ stated, “I wanted to see if you were around so I could go and pay you a visit.” FLORES replied, “Okay, sounds good. I’ll be around.” TORRES-TELLEZ asked, “What’s your address?” FLORES replied, “Take Cicero [Avenue] all the way down. I’ll see you at the corner of Cicero and Armitage [Avenue].” TORRES-TELLEZ stated, “Okay. At the corner of Cicero and Armitage.” FLORES stated, “There’s a Home Depot right there. I’ll meet you at the Home Depot.” TORRES-TELLEZ responded, “Sounds good.”

283. On April 30, 2011, at approximately 3:07 p.m., FLORES, using Target Phone 12, received an incoming call (Call #175) from TORRES-TELLEZ. During the call, TORRES-TELLEZ asked, “Are you almost here?” FLORES asked, “What [vehicle] are you in?” TORRES-TELLEZ responded, “A grey van. You didn’t see me parked here?” FLORES asked, “Grey?” TORRES-TELLEZ asked, “Weren’t you inside a truck?” FLORES stated, “I don’t see a grey one [grey van] there. I don’t see a grey truck anywhere around there.” TORRES-TELLEZ stated, “It’s a big grey van.” FLORES asked, “Isn’t it white? A white one?” TORRES-TELLEZ responded, “No. What car are you driving?” FLORES stated, “A black car.” TORRES-TELLEZ replied, “I’m right in front of that store.” FLORES asked, “Who are you there with?” TORRES-TELLEZ responded, “Just with a buddy of mine. It’s two of us.” FLORES stated, “I saw an older model white van

there.” TORRES-TELLEZ responded, “Well, it’s almost white. It’s kind of silver [silver van] . . . it’s [van] all enclosed [no windows on the sides or back]. Are you around here or did you leave?” FLORES replied, “I’m around here.” TORRES-TELLEZ advised, “Well, we’re here. That way we can go buy the things [conduct the heroin transaction], because it’s going to get late.” FLORES asked, “How should we do this [heroin transaction] . . . You said it’s just you guys [TORRES-TELLEZ and his buddy] right?” TORRES-TELLEZ replied, “Yes.” FLORES stated, “I’m back here where the bank is [Chase Bank next to Home Depot].” TORRES-TELLEZ asked, “Should we go there [bank]?” FLORES stated, “Or I’ll go there [Home Depot].” TORRES-TELLEZ asked, “Huh?” FLORES asked, “I’m asking if I should go over there [Home Depot]?” TORRES-TELLEZ stated, “Yes, it’s [Home Depot] . . . or wait for us there, sir.” FLORES replied, “Okay.” Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that, at this time, TORRES-TELLEZ delivered three kilograms of heroin to FLORES, as FLORES confirmed in the phone calls described below.

284. At approximately 3:19 p.m., court-authorized cell site information on Target Phone 12, a phone used by FLORES, indicated that the phone was picking up signals from the cell tower closest to the Home Depot, indicating that it was located near the Home Depot. Target Phone 12 continued to pick up signals from the cell tower closest to the Home Depot until at least 3:34 p.m.

285. On April 30, 2011, at approximately 4:51 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #185) to TORRES-TELLEZ. During this call, TORRES-TELLEZ asked, “Is everything okay?” FLORES responded, “Yes, cousin, I arrived here [home] already. It [the heroin] looks good. The only thing is that they [the kilograms of heroin] are kind of loose [the heroin is not tightly compressed into bricks], right ?” TORRES-TELLEZ confirmed, “Uh, huh.

Yes.” FLORES stated, “They [the kilograms of heroin] are loose, but we’ll see how they turn out, okay?” TORRES-TELLEZ responded, “Okay, cousin. Hopefully everything will be okay and the car [heroin] will turn out fine. Work at it [distribute the heroin].” FLORES remarked, “Alright, then.” TORRES-TELLEZ stated, “We’ll be in touch if anything. Later on or tomorrow, I’ll call you at the other address [phone].” FLORES stated, “There you go. Alright.”

286. On May 3, 2011, at approximately 8:01 a.m., FLORES, using Target Phone 13, placed an outgoing call (Call #281) to Individual H. During this call, FLORES stated, “Look, that thing [payment for three kilograms of heroin FLORES received from TORRES-TELLEZ] . . . we are going to resolve it [pay for the heroin] on Friday, okay?” Individual H stated, “That’s fine, but you got it [the heroin] already?” FLORES replied, “Yes.” Individual H then asked, “How much did you get?” FLORES responded, “It was like . . . the three shirts [three kilograms of heroin].” Individual H then stated, “Oh, alright then. You are going to deliver five-two [\$52,000], and you’re going to leave me two [\$2,000], two [\$2,000], and two [\$2,000]. It’s going to be six [a total of \$6,000], because I’m going to give my buddy Cuco [Individual H’s source of supply] half [of the proceeds], alright?” FLORES remarked, “Okay.” Individual H stated, “We are going to try with Cuco, with my buddy, and then give the five, two [\$52,000] to the man.” FLORES remarked, “Okay.” Individual H responded, “So, by Friday [FLORES will pay TORRES-TELLEZ for the three kilograms of heroin on Friday]. It will be until Monday then [FLORES had promised to have payment within eight days, which would be Monday].” FLORES stated, “Yeah, I told the guys [TORRES-TELLEZ] to hold off for a bit.” Individual H replied, “Yeah, I think you told them eight days [FLORES told TORRES-TELLEZ that he would pay them for the three kilograms of heroin

within eight days of receiving the heroin].” FLORES continued, “But it’s going to be before that, God willing [FLORES will pay for the heroin on Friday, before eight days have expired].”

287. On May 7, 2011, at approximately 3:15 p.m., FLORES, using Target Phone 12, received an incoming call (Call #413) from TORRES-TELLEZ. During this call, FLORES asked, “What time are you going to be able to come over here [to get the money]?” TORRES-TELLEZ asked, “What time is good for you?” FLORES stated, “Whatever time you want, as long as it’s early.” TORRES-TELLEZ asked, “How about you give me two hours?” FLORES asked, “Okay, did you talk to that guy [heroin source of supply] or not?” TORRES-TELLEZ stated, “I couldn’t get a hold of him, because he’s out of town, but he said he was going to call me. He [source of supply] said he was going to call me, another entree [shipment of heroin].” FLORES replied, “Because they told that when I give you that [money to pay off the previous three kilograms of heroin], you were going to give me the other two [two additional kilograms of heroin].” TORRES-TELLEZ stated, “Uh, huh . . . Uh, they [source of supply] didn’t tell me, they didn’t give me the green light [to give FLORES the two additional kilograms of heroin].”

288. On May 7, 2011, at approximately 3:54 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #418) to TORRES-TELLEZ. During this call, TORRES-TELLEZ stated, “We’ll stop by to see you if you want. I’m leaving here now.” FLORES asked, “How long, before you’re around here?” TORRES-TELLEZ replied, “Like 40 minutes.” FLORES remarked, “Alright then.” TORRES-TELLEZ advised, “I’ll call you once I’m arriving [to the north side of Chicago].” FLORES responded, “Alright, there where you went [Home Depot].” TORRES-TELLEZ agreed, “Alright then, that’s fine, cousin.”

289. On May 7, 2011, at approximately 5:36 p.m., FLORES, using Target Phone 12, received an incoming call (Call #421) from TORRES-TELLEZ. During this call, TORRES-TELLEZ stated, “We’re over here [Home Depot] buying material.” FLORES replied, “Okay, I’ll be right there. So, you’re already there [Home Depot]?” TORRES-TELLEZ stated, “We’re here buying material.” FLORES explained, “Okay, alright then. I’ll be right there.”

290. On May 7, 2011, beginning at approximately 5:44 p.m., surveillance observed the following: (a) a grey Ford van exited the Home Depot parking lot and proceeded west on Cortland Avenue through Cicero, where it parked on the north side of Cortland Avenue; (b) moments later, FLORES’ white Toyota Tacoma (hereinafter “**Toyota Tacoma**”) traveled south on Cicero Avenue and then turned west on Cortland Avenue, and parked in front of the grey Ford van; (c) FLORES exited the truck and approached the front passenger side of the grey Ford van; (d) at approximately 5:56 p.m., a 2006 silver Nissan Pathfinder registered to Individual L (hereinafter “**Silver Nissan Pathfinder**”) stopped next to the grey Ford van and the **Toyota Tacoma**; (e) moments later, FLORES approached the front passenger side of the **Silver Nissan Pathfinder** and then returned to the passenger side of the grey Ford van; (f) shortly thereafter, FLORES re-entered the **Toyota Tacoma**; and (g) all three vehicles departed the area. Surveillance following the grey Ford van observed TELLEZ³¹ as the driver of the grey Ford van, and also observed TORRES-TELLEZ as the passenger of the grey Ford van. Based on my knowledge of the investigation, the intercepted calls

³¹The identification of BERNARDO TELLEZ in this Affidavit is based in part on the following: On May 16, 2011, law enforcement officers conducted an investigative stop on the grey Ford van; the driver, and sole occupant of the vehicle, identified himself as Bernardo TELLEZ, and produced a Michigan driver’s license under that name. After a consent search in which officers seized approximately 9,447 grams of heroin from the van, TELLEZ was arrested. He has been charged in connection with this seizure in the Circuit Court of Cook County. Surveillance officers confirmed that TELLEZ was the same individual who was the driver of the grey Ford van on May 7, 2011.

and surveillance, I believe that, at this time, FLORES gave TORRES-TELLEZ and TELLEZ the remaining payment for the three kilograms of heroin.

291. On May 7, 2011, at approximately 6:21 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #423) to TORRES-TELLEZ. During this call, FLORES asked, “Did you guys arrive already [arrive home safely with the money that FLORES gave TORRES-TELLEZ]?” TORRES-TELLEZ advised, “No, we’re rolling [still driving].” FLORES stated, “Alright, call me once you arrive [home], okay?” TORRES-TELLEZ remarked, “Alright, cousin.”

292. On May 9, 2011, at approximately 2:55 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #611) to Individual H. During this call, FLORES stated, “I don’t know if it was Friday or Saturday, but I already gave the guys [TORRES-TELLEZ and TELLEZ] everything [money for the heroin], okay?” Individual H asked, “Did they [TORRES-TELLEZ] give you anything [heroin]? Because they [TORRES-TELLEZ] had two [two kilograms of heroin] there for you.” FLORES explained, “I told the guys [TORRES-TELLEZ and Tellez], and they didn’t give me anything [heroin]. They didn’t give me anything. I gave him [TORRES-TELLEZ] everything [money] and said, ‘Hey, I called down there [Mexico], and you’re supposed to give me the two [two kilograms of heroin],’ but they didn’t give me anything. But, I already gave them everything [money]. I already delivered theirs [money to TORRES-TELLEZ].” Later in the call, Individual H stated, “I asked him [TORRES-TELLEZ] about those tickets [money] that night [May 7], and he said, ‘No, I haven’t give him [FLORES] anything yet [more heroin].’” FLORES replied, “No, they [TORRES-TELLEZ] didn’t give me anything [additional heroin], but I already gave him [TORRES-TELLEZ] everything [money for the three kilograms of heroin].” Later in the call, FLORES stated, “I told this guy . . . I called him [TORRES-TELLEZ] 20 minutes after, “Are you guys [TORRES-

TELLEZ and TELLEZ] there [home] yet?’ He said, ‘No.’ I said, ‘Call me when you get home so I can know you guys got there.’” Individual H replied, “And my buddy [Cuco] says, ‘I think they’re [TORRES-TELLEZ and Tellez] going to give him [FLORES] two [two kilograms of heroin] once he [FLORES] delivers the tickets [money].” FLORES advised, “Well, I already turned it [money] in, and they [TORRES-TELLEZ] didn’t give me anything. They said supposedly on Sunday . . . yesterday.” Individual H stated, “Oh, because he [Cuco] told me that they [TORRES-TELLEZ] have two [two kilograms of heroin] for you, and if not, then he [Cuco] said that they’ll [additional kilograms of heroin] be there. They [kilograms of heroin] shouldn’t take much longer to get there.”

2. TORRES-TELLEZ and TELLEZ Possess With Intent To Distribute 9,774 Grams of Heroin on May 16, 2011

293. On May 10, 2011, Individual H contacted FLORES that “Cuco” had authorized TORRES-TELLEZ to provide additional heroin to FLORES, initially two kilograms. FLORES then spoke directly with TORRES-TELLEZ, and they eventually agreed to meet on May 16, 2011. On May 16, 2011, Individual H told FLORES that TORRES-TELLEZ had additional kilograms of heroin, and that FLORES could have more than two kilograms if he wanted. Individual H also told FLORES that FLORES could set up a date to pay for the heroin later. On May 16, 2011, surveillance observed TORRES-TELLEZ carry a red duffel bag into his residence and, shortly thereafter, TELLEZ emerged from the residence carrying the red duffel bag and also a blue duffel bag. When TELLEZ put the duffel bags in his car and drove away, law enforcement conducted an investigative stop, resulting in the recovery of almost ten kilograms of heroin from the duffel bags. Later, FLORES and Individual H discussed the seizure of the heroin.

294. On May 10, 2011, at approximately 11:53 a.m., FLORES, using Target Phone 12, received an incoming call (Call #541) from Individual H. During this call, Individual H stated, "My buddy [Cuco] told me to call the guy [TORRES-TELLEZ], but I don't know if right now or after 3:00 because he [TORRES-TELLEZ] is working. They're [TORRES-TELLEZ and TELLEZ] going to give you the ones [kilograms of heroin] that were left there." FLORES asked, "Who called you?" Individual H advised, "Cuco." FLORES remarked, "Oh." Individual H stated, "Call him [TORRES-TELLEZ] later, or right now, but since he [TORRES-TELLEZ] works he gets off at 3:00." FLORES remarked, "Okay." Individual H advised, "Because they [source of supply] hadn't given him [TORRES-TELLEZ] the green light [to give FLORES the remaining kilograms of heroin], and he [TORRES-TELLEZ] hadn't talked to the man [Cuco], but now he [Cuco] told him [TORRES-TELLEZ] so [to give FLORES additional heroin]." FLORES asked, "Alright. It was the two [FLORES asked if TORRES-TELLEZ was going to give him two kilograms of heroin], right?" Individual H stated, "Uh, huh. I think it was two or three [Individual H stated that TORRES-TELLEZ was going to give FLORES two or three kilograms of heroin]." FLORES remarked, "Alright."

295. On May 12, 2011, at approximately 2:09 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #628) to TORRES-TELLEZ. During this call, TORRES-TELLEZ stated, "They [sources of supply, Cuco and Individual H] told me that . . . to see if the sandals [kilograms of heroin] fit you [if FLORES was ready to pick up the heroin]." FLORES replied, "Oh. The sandals [kilograms of heroin] that you have, that they [sources of supply] told you about." TORRES-TELLEZ confirmed, "Mm, hmm." FLORES remarked, "Okay." TORRES-TELLEZ stated, "I don't know when you'll have a chance [to meet with TORRES-TELLEZ to obtain the

kilograms of heroin].” FLORES asked, “How much [heroin] would it be?” TORRES-TELLEZ responded, “What you had said [two kilograms of heroin].” FLORES stated, “Okay, alright then. Cousin, would you give me some time until tomorrow?” TORRES-TELLEZ advised, “Yeah, that’s fine. I’m working right now.” FLORES asked, “If not tomorrow, when are you off [work]?” TORRES-TELLEZ replied, “I’m off [work] on Saturday.” FLORES stated, “Well, if you want, we’ll hold off [completing the heroin transaction until Saturday].” TORRES-TELLEZ advised, “Whatever you want, cousin.” FLORES responded, “I’m kind of sick right now. Uh, from now until Saturday, is that okay [to wait for the heroin transaction]?” TORRES-TELLEZ remarked, “That’s fine. Don’t worry.”

296. On May 14, 2011, at approximately 1:55 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #713) to TORRES-TELLEZ. During this call, FLORES asked, “What do you think about meeting in the afternoon?” TORRES-TELLEZ asked, “Around what time?” FLORES responded, “Look, it’s because I’m far. If I’m not back late, can we leave it [heroin transaction] for tomorrow?” TORRES-TELLEZ advised, “Sounds good, cousin. Give me a call when you are free. If you can’t do it [heroin transaction] today, give me a call later on.”

297. On May 15, 2011, at approximately 11:50 a.m., FLORES, using Target Phone 12, placed an outgoing call (Call #757) to TORRES-TELLEZ. During this call, TORRES-TELLEZ stated, “If you want to meet today, whatever you want.” FLORES replied, “Yeah, that would be fine, cousin. How about around 2:00?” TORRES-TELLEZ responded, “Around 2:00? That’s fine
...

298. On May 15, 2011, at approximately 2:42 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #774) to TORRES-TELLEZ. During this call, TORRES-TELLEZ

stated, "Sorry, I went to do an errand. I'm freeing up right now. How about if I meet up with you at 3:30, 4:00?" FLORES replied, "Man, so then it's [heroin transaction] going to be until tomorrow. It's the weekend and that's why I was telling you at that time [original meet time] because the family wants to go out. If it can't be done, either way, don't worry. Tomorrow instead [heroin transaction], what do you think?" TORRES-TELLEZ responded, "Okay, if it's not a problem with you, we'll do it [heroin transaction] early tomorrow, if you want. I'm free tomorrow, just tell me when, if you want early, so we can free up, so we can go work on the house [complete the heroin transaction] that we had talked about." FLORES replied, "Okay, that's fine. Sounds good. Early tomorrow."

299. On May 16, 2011, at approximately 2:58 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #822) to TORRES-TELLEZ. During this call, FLORES stated, "I feel better now [during previous intercepted calls on May 16, 2011, FLORES complained about having a headache from too much alcohol consumption]. I'm out and about now. You can head out [to meet FLORES] at whatever time you'd like." TORRES-TELLEZ replied, "Okay. Let me just finish doing a couple of things I'm doing and I'll call you once I'm heading out." FLORES responded, "Okay, sounds good . . . so I can chat with you."

300. On May 16, 2011, surveillance observed the following: (a) at approximately 4:37 p.m., TORRES-TELLEZ and TELLEZ exited 10820 South Avenue J and entered the grey Ford van, which then departed the area, with TELLEZ as the driver and TORRES-TELLEZ as the front passenger; (b) the grey Ford van drove to a vacant lot, located at 10416 South Indianapolis Boulevard, Chicago, Illinois, and parked near a semi-tractor trailer in the lot; (c) a short time later, the grey Ford van departed the parking lot and drove back to 10820 South Avenue J, where

TORRES-TELLEZ exited the passenger seat of the vehicle carrying a red duffel bag, and then entered the residence, while TELLEZ also exited the vehicle and entered the residence.

301. On May 16, 2011, beginning at approximately 5:38 p.m., surveillance observed the following: (a) TELLEZ exit 10820 South Avenue J carrying a red duffel bag, which appeared to the same red duffel bag that TORRES-TELLEZ had previously entered the residence carrying, and also carrying a blue duffel bag; (b) TELLEZ placed the duffel bags into the front passenger door of the grey Ford van, and then entered the driver's seat of the grey Ford van and depart the area.

302. At approximately 5:40 p.m., law enforcement officers conducted an investigative stop on the grey Ford van. TELLEZ was the sole occupant of the vehicle. A law enforcement officer observed both the red and blue duffel bags on the front passenger seat of the grey Ford van. A law enforcement officer requested permission to search the vehicle and TELLEZ granted verbal consent. A search of the blue duffel bag resulted in the seizure of approximately two kilograms of suspect heroin and a search of the red duffel bag resulted in the seizure of approximately eight kilograms of suspect heroin. The substance recovered from the duffel bags was sent to the DEA laboratory where it was analyzed by an expert in forensic chemistry, and determined to consist of 9,774 grams of mixtures containing heroin.

303. After his arrest, TELLEZ, was advised of his Miranda rights, waived his rights and agreed to speak with law enforcement officers. TELLEZ then stated the following: (a) he knew the blue and red duffel bags contained illegal drugs, but he did not know the type or quantity; (b) when asked where he obtained the illegal drugs, TELLEZ stated that his cousin, "Timo" [TORRES-TELLEZ], spoke with a truck driver and made arrangements to pick-up the illegal drugs; (c) TELLEZ drove his Ford van, with TORRES-TELLEZ, to the area of 105th Street and Indianapolis

Boulevard, and met with a truck driver, who threw a red duffel bag into the Ford van; (d) TELLEZ and TORRES-TELLEZ then drove back to TORRES-TELLEZ's residence at 10820 South Avenue J in Chicago; (e) TORRES-TELLEZ took the red duffel bag from the Ford van and carried it into the residence; (f) TORRES-TELLEZ gave a red and blue duffel bag to TELLEZ, and directed TELLEZ where to deliver the illegal drugs.

304. On May 16, 2011, at approximately 7:12 p.m., FLORES, using Target Phone 12, received an incoming call (Call #832) from Individual H. During this call, Individual H stated, "Look, my buddy Cuco [heroin source of supply] called me." FLORES replied, "Uh, huh." Individual H asked, "I think you are meeting up with the guy [TORRES-TELLEZ] today or right now, right?" FLORES asked, "What?" Individual H asked, "That you are going to meet up with the guy [TORRES-TELLEZ] today or not?" FLORES advised, "The guy [TORRES-TELLEZ] said that we were going to meet up today, but he has not called me." Individual H stated, "Uh, well I think he [TORRES-TELLEZ] was [going to meet with FLORES]. Uh, they're [TORRES-TELLEZ and TELLEZ] going to meet you because I think they are going to give you two [two kilograms of heroin], but I think . . . if he [TORRES-TELLEZ] wanted to bring you more [more than two kilograms of heroin] . . . whatever you want . . . he'll bring it to you [Individual H advised that Cuco had sent TORRES-TELLEZ additional kilograms of heroin, which was most likely the eight kilograms of heroin seized by DEA, and that FLORES could ask TORRES-TELLEZ for more than two kilograms of heroin if FLORES wanted to]." FLORES advised, "Okay, the thing is, that I'm having problems with that [FLORES' customers were complaining about the heroin]." Individual H asked, "Oh, yeah?" FLORES advised, "It's not because of the quality [of the heroin], but because they [kilograms of heroin] are too short [on weight]. They're short [FLORES reiterated that the

kilograms of heroin were short on weight].” Individual H asked, “Oh, they [kilograms of heroin] are much smaller?” FLORES confirmed, “Uh, huh, yeah. That’s the problem. Uh, right now . . . they [customers] just complained to me on that [heroin] and that’s what I wanted to talk to you about . . . because it’s [heroin] coming out a bit short [on weight].” Individual H asked, “A bit smaller?” FLORES confirmed, “Yeah.” Individual H remarked, “Alright.” FLORES stated, “Uh, but there was no problem with the first ones [previous kilograms of heroin], but with this one [three kilograms of heroin previously supplied to FLORES by TORRES-TELLEZ] there is. The dude [customer] already called me on it and he [customer, most likely BECK] told me to see it so I can see that . . .” Individual H replied, “Right now, I’m going to call him [Cuco] . . . I’m going to call him right now. So, you’re saying that the quality is good, just that they [kilograms of heroin] are much smaller [short on weight].” FLORES confirmed, “Uh, huh.” Individual H responded, “Because he [Cuco] just called me and said that friend [TORRES-TELLEZ] is meeting with that guy [heroin courier who delivered approximately eight kilograms of heroin to TORRES-TELLEZ]. They [TORRES-TELLEZ and courier] are going to meet right now and they [TORRES-TELLEZ] were going to give it [heroin] to two [two kilograms of heroin to FLORES], but that the man [Cuco] told him [TORRES-TELLEZ] to give you whatever you wanted . . . five, six [Cuco told Individual H that FLORES could get five or six kilograms of heroin from TORRES-TELLEZ since Cuco’s courier just delivered eight kilograms of heroin to TORRES-TELLEZ], and you would set up a date [to pay for the heroin], but right now, I’ll call my buddy Cuco to tell him that the quality [of the heroin] is fine, but that they [kilograms of heroin] are coming out a bit much smaller [on weight].” FLORES stated, “Yeah, that’s where they discounted [shorted] me on [weight].” Individual H advised, “Right now, I’m going to tell him [Cuco] and see what’s up.” FLORES stated, “Alright then, and the

number [price]. The number [price] that they [Cuco] are giving me is too high. I can't do much with that fucking number [price]." Later in the call, Individual H stated, "I'll call him [Cuco] right now and see what's up because I think you were supposed to meet up with the guy [TORRES-TELLEZ], but I'm not sure if he's going to call you or you're going to call him. I honestly don't know." FLORES advised, "Uh, huh, yeah, he [TORRES-TELLEZ] is supposed to call me when he is ready."

305. On May 16, 2011, at approximately 9:14 p.m., FLORES, using Target Phone 12, received an incoming call (Call #836) from FNU LNU (a/k/a Cuco) (hereinafter, "Cuco"). During this call, Cuco stated, "Look, the dude walked [TORRES-TELLEZ had been arrested after the seizure of heroin].³² Okay? Throw away your numbers [FLORES should get rid of his telephones because TORRES-TELLEZ had FLORES's number in his phone]. You understand me? They [police] got the guy [TORRES-TELLEZ]. The guy [TORRES-TELLEZ] was on his way to see you and on the way, they [police] got him [arrested TORRES-TELLEZ]." FLORES remarked, "Oh." Cuco continued, "Uh, huh, with the . . . with what he had with him [kilograms of heroin that TORRES-TELLEZ and TELLEZ had to distribute to FLORES]." FLORES remarked, "Son of a bitch." Cuco advised, "So you can throw out your phone. Don't answer it anymore." FLORES stated, "Okay." Cuco stated, "And the other one [Cuco wanted FLORES to get rid of both of his phones], too. Uh, huh . . . and tomorrow, there is a guy [another heroin contact] there that I think is going to see you. You understand me? We're going to wait for a couple of days only [to get more heroin]. Tomorrow or the day after. You understand me?" FLORES remarked, "Alright." Cuco

³²Shortly after law enforcement seized the 9,774 grams of heroin and arrested TELLEZ, law enforcement officers arrested TORRES-TELLEZ based on, among other things, the intercepted calls and surveillance.

reiterated, "Turn all that off [the phones] now or throw it [the phones] out." FLORES remarked, "Alright, then." Cuco asked, "Uh, huh, then tomorrow . . . you didn't take him [TORRES-TELLEZ] to your house, right?" FLORES advised, "No, no."

306. On May 17, 2011, at approximately 2:18 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #1035) to Individual H. During this call, Individual H stated, "My buddy [Cuco] came last night and was like, 'Call this guy [FLORES] to see what's up, because there was a problem [seizure and arrest] over there.' But it was just the guy [they believed that TORRES-TELLEZ was the reason for the seizure]." FLORES replied, "It's because that's a young kid [FLORES advised that TORRES-TELLEZ was young], man." Individual H asked, "He's young?" FLORES advised, "Yes, he's [TORRES-TELLEZ] young. It's always two young kids [TORRES-TELLEZ and TELLEZ] that are together [FLORES advised that TORRES-TELLEZ and TELLEZ were always together during their drug dealings with FLORES]." Individual H asked, "So, they both [TORRES-TELLEZ and TELLEZ] fucked up?" FLORES stated, "They [TORRES-TELLEZ and TELLEZ] are always together, so I think they did." Individual H asked, "It seems like they were nervous or something, right?" FLORES confirmed, "Yes." Later in the call, FLORES stated, "Yes, both [TORRES-TELLEZ and TELLEZ] were both young." Individual H asked, "Where were they from?" FLORES advised, "Well, I think they were from . . . I didn't want to ask, but I think they are relatives of that fucker [Cuco]. That's what I'm thinking . . . if the boss over there [in Mexico]." Individual H advised, "Right, right." FLORES stated, "That's what I think." Individual H replied, "Poor guy." FLORES reiterated, "Man, these are young kids [TORRES-TELLEZ and TELLEZ]." Individual H asked, "So when will they [TORRES-TELLEZ and TELLEZ] get out, or are they?" FLORES stated, "Nope, that's fucked up." Individual H asked, "They [TORRES-TELLEZ and

TELLEZ] were taking two [two kilograms of heroin] right?” FLORES advised, “I really don’t know.” Individual H responded, “I think it was two [two kilograms of heroin]. But, uh . . . they [TORRES-TELLEZ and TELLEZ] had more of those [additional kilograms of heroin] over there because . . . remember I told you to tell them [TORRES-TELLEZ and TELLEZ] to give you more [heroin] because they had already given us the green light?” FLORES remarked, “Mm, hmm.” Individual H stated, “So, the rest [more heroin] is still over there [in Chicago]. But the day after tomorrow . . . by Friday or Saturday, they [Cuco] are going to put another guy [heroin contact for FLORES to meet with].”

E. ANGEL HERNANDEZ

1. ANGEL HERNANDEZ Supplies A Kilogram of Heroin To The BLOUNT-BRIDGES DTO on November 1, 2010

307. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on November 1, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the ANGEL HERNANDEZ DTO, in a deal brokered by ACEVEDO-MARCHAN. BLOUNT and BRIDGES, with CHARLES THOMAS acting as security, went to ACEVEDO-MARCHAN’s residence, where they met with ANGEL HERNANDEZ, and picked up the heroin.

308. On October 25, 2010, at approximately 3:25 p.m., ACEVEDO-MARCHAN, using Target Phone 4, had a telephone conversation with ANGEL HERNANDEZ³³ (Call #3946), in which

³³The identification of ANGEL HERNANDEZ and his voice in this Affidavit is based in part on the following: On October 22, 2010, pursuant to an intercepted call (Call #933) at 1:49 p.m. over Target Phone 4, ACEVEDO-MARCHAN agreed to meet the user of telephone number (773) 596-4983 at the “gas station” located at “Grand and Mannheim.” At approximately 2:25 p.m., surveillance observed ACEVEDO-MARCHAN arrive at the Citgo gas station, located at Grand Avenue and Mannheim Road, Franklin Park, Illinois. At approximately 2:38 p.m., another call (Call #987) was intercepted over Target

ANGEL HERNANDEZ stated, "I'm going to take you something to look at it [a sample of heroin] and let me know if . . . " ACEVEDO-MARCHAN interrupted, "You are going to bring it so I can take a look at it?" ANGEL HERNANDEZ answered "Yes" and ACEVEDO-MARCHAN asked, "But isn't it sealed?" ANGEL HERNANDEZ responded, "No, I'm going to give you the sample [of narcotics], uh . . .if he likes, it, come on down." ACEVEDO-MARCHAN asked, "What color is it [the heroin]?" ANGEL HERNANDEZ responded, "Well, you are going to see it for yourself." ACEVEDO-MARCHAN stated, "Don't you know if it's good or bad?" ANGEL HERNANDEZ responded, "No." ACEVEDO-MARCHAN explained, "That way [if we know that the heroin is good] I'll just give you the money and you can leave, that's it." ANGEL HERNANDEZ stated, "I

Phone 4, where the user of telephone number (773) 596-4983 stated, "I'm almost there." At approximately 2:44 p.m., surveillance observed a black four-door Honda, bearing Illinois license plate A973060, arrive and park next to ACEVEDO-MARCHAN's vehicle. Minutes later, the black Honda, driven by the individual now known as ANGEL HERNANDEZ, departed the Citgo parking lot, and mobile surveillance was established. At approximately 2:51 p.m., surveillance observed the black Honda arrive at K-Mart, located at 10205 Grand Avenue, Franklin Park, Illinois. At approximately 3:16 p.m., another call (Call #1011) was intercepted over Target Phone 4, where the user of (773) 596-4983 stated he was at K-Mart. At about the same time, surveillance observed the driver of the black Honda exit K-Mart, re-enter the black Honda and depart the area. An inquiry of license plate A973060 revealed that the vehicle is registered to Angel HERNANDEZ, 6249 West Grace, Chicago, Illinois. After obtaining an Illinois driver's license photograph of ANGEL HERNANDEZ, surveillance positively identified the driver of the black Honda as ANGEL HERNANDEZ. Furthermore, based on the above surveillance observations, coupled with the timing of the calls, law enforcement officers identified ANGEL HERNANDEZ as the user of telephone number (773) 596-4983. Also, on January 4, 2011, intercepted calls (Call #'s 438, 441, 442, 443) over Target Phone 5 revealed that FLORES and the user of Target Phone 8 planned on meeting to conduct a narcotics transaction. At approximately 11:45 a.m., surveillance observed FLORES arrive in his **Black Nissan Pathfinder** in the 5100 block of West Medill Street. During Call #443, the user of Target Phone 8 advised, "I'll be there in five minutes." At approximately 11:53 a.m., surveillance observed FLORES exit his vehicle and enter the passenger seat of HERNANDEZ' black Honda. At this time, surveillance identified ANGEL HERNANDEZ as the driver of the black Honda. Spanish linguists contracted by DEA conducted voice comparisons of the user of telephone number (773) 596-4983, the user of Target Phone 8, the user of Target Phone 10 and the user of Target Phone 14, and concluded that all of the voices were the same which, based upon surveillance and license plate registration, is ANGEL HERNANDEZ. In the summaries of the intercepted calls in this Affidavit in which ANGEL HERNANDEZ is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to ANGEL HERNANDEZ in each of these summaries is the same.

said that it is good, man. No problem.” ACEVEDO-MARCHAN responded, “Just as long as it’s sealed. What’s the stamp that it has [to indicate the type of heroin] . . . because he wants to look at whole ones [whole kilogram quantities], understand?” ANGEL HERNANDEZ stated, “I’ll take it to you.” ACEVEDO-MARCHAN responded, “Well, let me see the sample . . . come and bring it to me.” ANGEL HERNANDEZ replied, “Okay, I’ll be over.”

309. On November 1, 2010, at approximately 6:17 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #11423) from BLOUNT, who was using Target Phone 3. During the call, BLOUNT told ACEVEDO-MARCHAN, "Man, you know I'm trying to uh . . . all the way [buy a kilogram of heroin]." ACEVEDO-MARCHAN told BLOUNT that he didn't hear him and BLOUNT repeated, "I said trying to go all the way [buy a kilogram of heroin]." ACEVEDO-MARCHAN asked BLOUNT what time he was coming by and BLOUNT responded, "Why don't you call him [ANGEL HERNANDEZ]? I'm just . . . I'm counting up this [money], you know what I'm saying? I'm doing my counting [money] and see . . ." ACEVEDO-MARCHAN asked BLOUNT, "You need the whole [one kilogram] thing [heroin]?" BLOUNT replied, "Yeah."

310. On November 1, 2010, at approximately 6:21 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #11425) from ANGEL HERNANDEZ. During this call, ACEVEDO-MARCHAN told ANGEL HERNANDEZ, "The black guy [BLOUNT] called me. He wants some [heroin]. You already know [the amount of heroin]." ANGEL HERNANDEZ asked when and ACEVEDO-MARCHAN replied, "Right now. He's [BLOUNT] coming for the whole one [kilogram of] heroin]. I want to be sure for right now. If not, I can look . . ." ANGEL HERNANDEZ interrupted, "We'll see right now what's up."

311. On November 1, 2010, at approximately 6:23 p.m., ACEVEDO-MARCHAN, using Target Phone 4, received an incoming call (Call #11426) from ANGEL HERNANDEZ. During this call, ANGEL HERNANDEZ stated, "Yes, there's no problem [ANGEL HERNANDEZ can supply ACEVEDO-MARCHAN with the heroin]." ACEVEDO-MARCHAN told ANGEL HERNANDEZ, "But it [heroin] has to be original [good quality]. I don't want no bullshit [bad quality heroin]. I want it sealed [whole kilogram] . . . guaranteed [quality of the heroin], alright? If not, you're going to return all my money [for the heroin] . . ." ANGEL HERNANDEZ agreed. ACEVEDO-MARCHAN asked ANGEL HERNANDEZ, "Five-nine [\$59,000 for the kilogram], alright?" ANGEL HERNANDEZ responded, "Yes." ACEVEDO-MARCHAN agreed to call ANGEL HERNANDEZ when BLOUNT arrived. Based upon my knowledge and experience, and that of other officers, I believe that the price discussed by ANGEL HERNANDEZ and ACEVEDO-MARCHAN is consistent with the price of a kilogram of heroin.

312. On November 1, 2010, at approximately 6:38 p.m., BLOUNT, using Target Phone 3, made an outgoing call (Call #33836) to CHARLES THOMAS, and stated, "It's time to go to work [it's time to go pick up the heroin from ACEVEDO-MARCHAN]." BLOUNT instructed CHARLES THOMAS to pick up the Dodge Caravan and a Buick Lacrosse vehicle. At approximately 8:47 p.m., BLOUNT, using Target Phone 3, received an incoming call (Call #33899) from CHARLES THOMAS, during which CHARLES THOMAS asked, "Didn't you tell me to come over here and get the van [silver Dodge Caravan]?" BLOUNT replied that CHARLES THOMAS should not worry about it, that BLOUNT was "in the van [silver Dodge Caravan] now."

313. On November 1, 2010, at approximately 9:05 p.m., law enforcement officers conducting surveillance observed the **Cadillac Escalade** pull into the rear gated yard of **the 1920**

North Karlov Residence. Approximately 10 minutes later, the silver Dodge Caravan pulled in behind ACEVEDO-MARCHAN's residence and parked next to the Escalade.

314. On November 1, 2010, at approximately 9:27 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #11583) to ANGEL HERNANDEZ, and asked his whereabouts. ANGEL HERNANDEZ responded, "In the front [of ACEVEDO-MARCHAN's residence]." ACEVEDO-MARCHAN asked, "You have it [heroin] there ready?" ANGEL HERNANDEZ replied, "Yes." Minutes later, ACEVEDO-MARCHAN, using Target Phone 4, placed another outgoing call (Call #11598) to ANGEL HERNANDEZ, and instructed, "Come over here [ACEVEDO-MARCHAN's residence] quickly . . . bring it [heroin] over here."

315. On November 1, 2010, at approximately 9:39 p.m., BLOUNT, using Target Phone 3, placed an outgoing call (Call #33965) to CHARLES THOMAS. During this call, BLOUNT stated to CHARLES THOMAS, "Tell them [ACEVEDO-MARCHAN and ANGEL HERNANDEZ] to let you out [of ACEVEDO-MARCHAN's residence]. We got to go [take the heroin back to the south side of Chicago]." CHARLES THOMAS agreed. Approximately one minute later, surveillance observed CHARLES THOMAS exit the residence at **the 1920 North Karlov Residence**, and get into a red Toyota Celica parked on the street and depart the area. I believe that BRIDGES and CHARLES THOMAS had picked up the heroin from ACEVEDO-MARCHAN and ANGEL HERNANDEZ at ACEVEDO-MARCHAN's residence, and that BLOUNT had acted as security outside, watching for law enforcement.

316. On November 1, 2010, at approximately 9:45 p.m., BLOUNT, using Target Phone 3, placed an outgoing call (Call #33975) to CHARLES THOMAS. During this call, BLOUNT asked CHARLES THOMAS his location and, upon learning that CHARLES THOMAS had stopped for

gas, told him to wait so that BLOUNT could catch up with him. I believe that, at this time, BRIDGES and CHARLES THOMAS had picked up the heroin, and that BLOUNT was coordinating as security for the ride back to the south side of Chicago.

317. On November 1, 2010, at approximately 10:27 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #11642) to ANGEL HERNANDEZ. During this call, ACEVEDO-MARCHAN asked, "Is everything [the money] fine?" ANGEL HERNANDEZ responded, "They [suppliers] are about to go check it [the money]. They'll tell me right now." ACEVEDO-MARCHAN replied, "Okay, that guy [BLOUNT] is also going to check it [heroin] out. Let me know about anything [problems]." ANGEL HERNANDEZ replied, "Yes, it's [heroin] fine. He [ANGEL HERNANDEZ's supplier] said it's 10 [grams] up [more than a kilogram]. It [heroin] weighs 10 points [grams] more." ACEVEDO-MARCHAN replied, "The material [heroin] should be good [quality]." ANGEL HERNANDEZ stated, "It's [heroin] fine [quality]. He [ANGEL HERNANDEZ's supplier] said that he hasn't had any complaints about that [the quality of the heroin]." ACEVEDO-MARCHAN told ANGEL HERNANDEZ, "If there isn't complaints [about the heroin], then there isn't any problems. That [money] is well counted. It's not a problem."

2. ANGEL HERNANDEZ Distributes 1 ½ Kilograms of Cocaine to the BLOUNT-BRIDGES DTO On January 15, 2011

318. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on January 15, 2011, ANGEL HERNANDEZ distributed 1 ½ kilograms of cocaine to the BLOUNT-BRIDGES DTO. On January 15, 2011, ANGEL HERNANDEZ and ACEVEDO-MARCHAN met at BRIDGES' residence, where ANGEL HERNANDEZ delivered the cocaine and ACEVEDO-MARCHAN counted the money.

319. On January 14, 2011, at approximately 11:48 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #61) from BRIDGES. During this call, BRIDGES asked, "Remember what you did the other day [previous cocaine transaction]?" ACEVEDO-MARCHAN replied, "Uh-huh." BRIDGES then stated, "Okay, minus the half [BRIDGES was seeking a kilogram of cocaine]." ACEVEDO-MARCHAN asked, "Just one [kilogram of cocaine]?" BRIDGES stated, "Yeah."

320. On January 14, 2011, at approximately 11:51 a.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #62) to ANGEL HERNANDEZ. During this call, ACEVEDO-MARCHAN stated, "We're going to take one [kilogram of cocaine] for later, man. . . over there, the same place [BRIDGES' residence]." ANGEL HERNANDEZ asked, "Same place?" ACEVEDO-MARCHAN stated, "Uh-huh." ACEVEDO-MARCHAN then repeated, "The place [BRIDGES' residence] . . . what we took [on a previous occasion], only one [kilogram of cocaine]." ANGEL HERNANDEZ again replied, "Alright."

321. On January 14, 2011, at approximately 12:32 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #68) to BRIDGES. During this call, ACEVEDO-MARCHAN stated, "Hey, what I'm getting? I'm getting one [\$1,000] for my ass, okay, bro?" BRIDGES asked, "One what?" ACEVEDO-MARCHAN advised, "You know what, man." BRIDGES asked, "One what, man? Fuck are you talking about?" ACEVEDO-MARCHAN stated, "It's [one kilogram of cocaine] going to be 29 [\$29,000]." BRIDGES replied, "Come on man. I don't even know what the guy charge." ACEVEDO-MARCHAN stated, "Let me know cause . . . at least I tell you...five [\$500], no?" BRIDGES asked, "Huh?" ACEVEDO-MARCHAN responded, "Cause I ain't getting shit [enough money] out of it. I keep saying it's . . ." BRIDGES advised,

“You gotta tell that mother fucker [ANGEL HERNANDEZ] to give you something, man. You doing this shit [delivering the cocaine].” ACEVEDO-Marchan stated, “Alright, let me know. See how much it is [price of the cocaine].” Based on my knowledge and experience, and that of other officers, I believe that the price discussed by ACEVEDO-MARCHAN and BRIDGES is consistent with a kilogram of cocaine.

322. On January 14, 2011, at approximately 3:17 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #79) from ANGEL HERNANDEZ. During this call, ANGEL HERNANDEZ stated, “I have one-half [$\frac{1}{2}$ kilogram of cocaine], the one I took him [$\frac{1}{2}$ left over from a previous deal with BRIDGES] and another one [additional $\frac{1}{2}$ kilogram of cocaine]. Ask him [BRIDGES] if he wants it [cocaine] like that.” ACEVEDO-MARCHAN asked, “But it’s whole [ACEVEDO-MARCHAN asked if the $\frac{1}{2}$ kilograms of cocaine were whole or broken into smaller pieces]?” ANGEL HERNANDEZ confirmed, “Yeah, it’s [cocaine] complete.” Later in the call, ANGEL HERNANDEZ stated, “And, uh, tell him [BRIDGES], either way, it’s the same thing [the same cocaine that ANGEL HERNANDEZ had previously supplied to BRIDGES].”

323. On January 14, 2011, at approximately 3:34 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #83) from BRIDGES. During this call, ACEVEDO-MARCHAN asked, “What you say about that? How much is it [cocaine]? 29 [\$29,000]?” When BRIDGES answered, “28 [\$28,000], man,” ACEVEDO-MARCHAN responded, “Let me get 28 $\frac{1}{2}$ [\$28,500] so I can get half [\$500] for me, no?” BRIDGES stated, “You know I’m going to look out for you, man.” ACEVEDO-MARCHAN replied, “I want half [\$500], man. I want five [\$500]. Come on. I’ll go right now.” Later in the call, ACEVEDO-MARCHAN advised, “Listen, the end of the day when we went up there [previous transaction], it’s

[cocaine] the same shit [as previous transaction], but we got . . . remember, he [ANGEL HERNANDEZ] took one and a half [ANGEL HERNANDEZ had previously supplied BRIDGES with 1 ½ kilograms of cocaine], right? The other half [½ kilogram of cocaine], he [ANGEL HERNANDEZ] got it saved so he got it right there and you got another one-half [½ kilogram of cocaine] . . . but it's going to be loose. That's what I'm saying, so it's no problem?" BRIDGES asked, "It's [cocaine] in two halves [two 500 gram quantities]?" ACEVEDO-MARCHAN stated, "Yeah, but I'll put everything [cocaine] together, so it's going to be not ripped, but it's [cocaine] the same shit, it's quality, you know that."

324. On January 14, 2011, at approximately 4:05 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #90) from BLOUNT. During this call, BLOUNT stated, "Like we just did [previous cocaine transaction] the other day, right?" ACEVEDO-MARCHAN remarked, "Uh, huh." BLOUNT replied, "I need another whole one [another kilogram of cocaine]." ACEVEDO-MARCHAN asked, "Uh, for when? Tomorrow?" BLOUNT answered, "Right now." A few minutes later, ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #96) from BRIDGES. During this call, BRIDGES stated, "Yeah, he [BLOUNT] said that's [one kilogram of cocaine] for somebody different [customer], so it's two [two kilograms of cocaine]." ACEVEDO-MARCHAN later stated, "Because I don't know if I can get two [two kilograms of cocaine], but you should of told me man, uh . . . I'll do one [one kilogram of cocaine] today and I'll do the other one [one kilogram of cocaine] tomorrow. I got you today then. I'm going to call him and we'll do it [another cocaine transaction] tomorrow then."

325. On January 14, 2011, at approximately 4:22 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #98) from ANGEL HERNANDEZ. During this

call, ANGEL HERNANDEZ stated, "Tell him [BRIDGES] that right now, we have half [½ kilogram of cocaine]. . . so you don't have any problems." ACEVEDO-MARCHAN replied, "Tomorrow, we'll give him [BRIDGES] the rest [more cocaine]." ANGEL HERNANDEZ responded, "If he needs it [cocaine] urgent, right now half [½ kilogram of cocaine], okay?" ACEVEDO-MARCHAN advised, "Try to complete it [make one kilogram of cocaine], dude." ANGEL HERNANDEZ remarked, "Yes, yes, that's what I'm going to try to do. Okay?"

326. On January 14, 2011, at approximately 5:46 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #121) to BRIDGES, and they agreed that the cocaine deal would occur the next day. Minutes later, ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #124) from ANGEL HERNANDEZ. During that call, ACEVEDO-MARCHAN told ANGEL HERNANDEZ that they would do the cocaine transaction the following day. ANGEL HERNANDEZ agreed.

327. On January 14, 2011, at approximately 7:58 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #146) from BRIDGES. During this call, BRIDGES asked, "You got uh . . . you got another one? A half of them things [½ kilogram of cocaine]?" ACEVEDO-MARCHAN replied, "Yeah." BRIDGES then stated, "Okay, I'm going to need it." ACEVEDO-MARCHAN replied, "Okay."

328. On January 14, 2011, at approximately 8:29 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #149) to ANGEL HERNANDEZ. During this call, ACEVEDO-MARCHAN asked, "Look, do you remember what was left from the other one [a kilogram of cocaine that was previously divided into halves]?" ANGEL HERNANDEZ stated, "Uh-huh." ACEVEDO-MARCHAN asked, "Can you take it [to BRIDGES], too?" ANGEL

HERNANDEZ replied, "Yes." ACEVEDO-MARCHAN then said, "Okay, so it can be the same as last time [previous 1½ kilogram cocaine transaction with BRIDGES]." Later in this call, ACEVEDO-MARCHAN stated that he would go to BRIDGES' residence, and, "I'll wait for you over there [with BRIDGES], and when I'm ready [to receive the cocaine], I'll call you, so we're not waiting and going in and out, okay?" ANGEL HERNANDEZ replied, "You bring me the money [from BRIDGES], and then you can take that [the cocaine]."

329. On January 15, 2011, at approximately 10:22 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #184) from BRIDGES. During this call, BRIDGES stated, "Hey, I need the whole one [one kilogram of cocaine], too [in addition to the ½ kilogram of cocaine]." ACEVEDO-MARCHAN asked, "The 1 ½ [1 ½ kilograms of cocaine]?" BRIDGES replied, "Yeah, the guy [customer] just called, the other guy [customer for the one kilogram of cocaine], he's on his way." ACEVEDO-MARCHAN, using Target Phone 6, immediately placed an outgoing call (Call #185) to ANGEL HERNANDEZ. During this call, ACEVEDO-MARCHAN stated, "Hey, the other guy [customer] showed up . . . Everything [1 ½ kilograms of cocaine] all together, okay?" ANGEL HERNANDEZ agreed.

330. On January 15, 2011, at approximately 11:16 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #195) from BRIDGES. During this call, BRIDGES stated, "Yeah, come on back [to BRIDGES' residence]." ACEVEDO-MARCHAN replied, "Okay." Approximately 15 minutes later, ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #200) from ANGEL HERNANDEZ. During this call, ANGEL HERNANDEZ stated, "I'm outside [of BRIDGES' residence]." ACEVEDO-MARCHAN replied, "You're here? Okay, come in [to BRIDGES' residence] then, come in. Give them [1 ½ kilograms of cocaine] to

this guy [BRIDGES]. He'll [BRIDGES] get it [cocaine] and come back in." ANGEL HERNANDEZ remarked, "Alright, then." ACEVEDO-MARCHAN responded, "He'll [BRIDGES] be there and I'll be there with the money." I believe that, at this time, ANGEL HERNANDEZ delivered 1½ kilograms of cocaine to BRIDGES, and ACEVEDO-MARCHAN turned over BRIDGES' money for the cocaine to ANGEL HERNANDEZ.

331. On January 15, 2011, at approximately 12:37 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #214) from BRIDGES. During this call, BRIDGES stated, "The guy [BRIDGES's customer] with the whole one [one kilogram of cocaine] said he's short [less than one kilogram]." ACEVEDO-MARCHAN asked, "Okay. How much is he short [how many grams is the kilogram of cocaine missing]?" BRIDGES replied, "I think he [customer] said 38 [38 grams short of one kilogram of cocaine]." ACEVEDO-MARCHAN responded, "Okay, I'll talk to them [ANGEL HERNANDEZ] and . . . we got him, okay [ACEVEDO-MARCHAN and ANGEL HERNANDEZ would make sure the customer receives the entire kilogram of cocaine]? Don't let him go [don't let the customer leave], okay?"

332. On January 15, 2011, at approximately 1:46 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #255) from ANGEL HERNANDEZ. During this call, ANGEL HERNANDEZ stated, "In one [bag] it's 21 [\$21,000]." ACEVEDO-MARCHAN replied, "No, in one of them [bags] it's 28 [\$28,000], and the other, seven and seven [\$14,000]." ANGEL HERNANDEZ responded, "No, no, no. I'm checking [the money] right now. One [bag] has 26 [\$26,000] and the other [bag] is 13,490 [\$13,490]." ACEVEDO-MARCHAN asked, "13,490?" ANGEL HERNANDEZ responded affirmatively. ACEVEDO-MARCHAN then asked, "What do you mean? It was 28 [\$28,000] in one and the other was 14 [\$14,000]. ANGEL

HERNANDEZ stated, "No, it's 26 [\$26,000] in the white bag!" ACEVEDO-MARCHAN then said, "But in the other one, it's all seven [\$7,000], count them!" ANGEL HERNANDEZ replied, "I'm counting it [money] by hand and with the thing [money counter]." Later in the call, ANGEL HERNANDEZ stated, "Let me check [count the money] again." ACEVEDO-MARCHAN replied, "Check it. I counted it right, man!"

333. On January 15, 2011, at approximately 2:13 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #258) from ANGEL HERNANDEZ. During this call, ANGEL HERNANDEZ stated, "We're still missing [money] anyway, dude." ACEVEDO-MARCHAN replied, "100 pesos [\$100] are missing. The black guy [BRIDGES] told me, because he forgot to give it to me." ANGEL HERNANDEZ later stated, "It's 13,495 [\$13,495]." ACEVEDO-MARCHAN asked, "How? 13,495?" ANGEL HERNANDEZ responded, "In one [bag]. And in the other one, 28 [\$28,000]." ACEVEDO-MARCHAN replied, "No, no, no, no. You're wrong, you're wrong." ANGEL HERNANDEZ stated, "No, I checked it already." ACEVEDO-MARCHAN then responded, "Okay, then I'll talk to this dude [BRIDGES] then." ANGEL HERNANDEZ replied, "There's six hundred missing. I mean, five hundred [\$500]. Five hundred and five [\$505]."

334. ACEVEDO-MARCHAN, using Target Phone 6, then immediately placed an outgoing call (Call #259) to BRIDGES. During this call, ACEVEDO-MARCHAN stated, "You don't think we made a mistake [counting the money]? On the ones that we counted, 14 [\$14,000]?. . . He [ANGEL HERNANDEZ] said it's \$500 missing." BRIDGES replied, "There's \$500 missing?" ACEVEDO-MARCHAN advised, "Yep, because I give you one stack [of money], remember?" BRIDGES stated, "No, but I gave him [ANGEL HERNANDEZ] one stack [of money],

cause I took all of them singles [\$1 bills] and shit and I put a stack [of money] in there.” ACEVEDO-MARCHAN confirmed, “It was missing \$500. The one money we didn’t count. The one we didn’t count.” Later in the call, BRIDGES stated, “That’s our fault cause we should’ve counted it [money].” ACEVEDO-MARCHAN responded, “Yeah, bro, it’s your fault, yeah.”

F. ARMANDO FERNANDEZ

FERNANDEZ Distributes 100 Grams of Heroin to the BLOUNT-BRIDGES DTO on January 28, 2011

335. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on January 28, 2011, FERNANDEZ distributed 100 grams of heroin to the BLOUNT-BRIDGES DTO, in a deal brokered by ACEVEDO-MARCHAN. ACEVEDO-MARCHAN obtained the heroin from FERNANDEZ, and brought it to BRIDGES on the south side of Chicago, where he picked up the money for the heroin from BRIDGES. A short time later, BRIDGES complained about the quality of the heroin, and ACEVEDO-MARCHAN returned the money and took back the heroin.

336. On January 26, 2011, at approximately 4:09 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1138) from BRIDGES. During this call, BRIDGES stated, “I need a hundred [100 grams of heroin] man.” ACEVEDO-MARCHAN confirmed and told BRIDGES that he would call him back.

337. On January 26, 2011, at approximately 5:09 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1148) from FERNANDEZ.³⁴ During the call,

³⁴The identification of FERNANDEZ and his voice in this Affidavit is based in part on the following: During an intercepted call (Call #1148) over Target Phone 6, the user of telephone number

ACEVEDO-MARCHAN told FERNANDEZ, "I need to see you . . . to lend me a hundred 'pesos' [100 grams of heroin]." FERNANDEZ replied, "I'll go over there [ACEVEDO-MARCHAN's residence] right now." ACEVEDO-MARCHAN replied, "Okay, because I was going to the south side [of Chicago]. Remember, like last time [previous transaction]." FERNANDEZ responded, "Okay, like last time [previous transaction]?"³⁵ ACEVEDO-MARCHAN replied, "Uh-huh, but I only want a hundred 'pesos' [grams of heroin] to lend me. Call me right away as soon as it [narcotic transaction] can happen." FERNANDEZ agreed.

(773) 932-3522 identified himself as "Armando." During other intercepted calls over Target Phone 6, the user of telephone number (773) 430-2453 (Call #458), of telephone number (773) 699-4637 (Call #4359, 4531, 6413), and of telephone number (920) 632-8089 (Call #6562), identified himself as "Puppet." During an intercepted call (Call #8551) over Target Phone 6, ACEVEDO-MARCHAN referred to the user of telephone number (773) 716-4373 as "Pupp." During an intercepted call (Call #879) over Target Phone 15, ACEVEDO-MARCHAN referred to the user of telephone number (773) 408-4076 as "Puppet." Spanish linguists contracted by DEA have compared the voices of the user of telephone numbers (773) 430-2453, (773) 932-3522, (773) 699-4637, (920) 632-8089, (773) 716-4373 and (773) 408-4076, and have determined that the user of all six telephones is the same individual. On June 1, 2011, surveillance observed FERNANDEZ, identified through a known booking photograph, exit the 1214 North Harding Avenue. At that time, a Spanish speaking officer engaged in a face-to-face conversation with FERNANDEZ (which also was recorded); after the conversation, the officer listened to intercepted calls involving "Puppet's" use of the six telephones identified above, and concluded that the voice on all of the intercepted calls belonged to FERNANDEZ. Spanish speaking monitors familiar with the intercepted calls involving "Puppet's" use of the six telephones identified herein also listened to the recording of the face-to-face conversation with FERNANDEZ, and concluded that all of the voices belonged to the same individual, now identified as FERNANDEZ. Based on this information, law enforcement officers have identified Armando FERNANDEZ as the user of telephone numbers (773) 430-2453, (773) 932-3522, (773) 699-4637, (920) 632-8089 and (773) 716-4373. In the summaries of the intercepted calls in this Affidavit in which FERNANDEZ is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to FERNANDEZ in each of these summaries is the same.

³⁵On May 15, 2009, FERNANDEZ was arrested by CPD with five baggies of heroin in his possession. After he was taken into custody, FERNANDEZ told the officers "Yeah, I sell heroin but I will give you \$50,000 if you let me go." Shortly thereafter, CPD executed a search warrant at FERNANDEZ's then-residence, and seized an additional 2,862 grams of heroin (as well as multiple loaded guns and ammunition, as more fully described below in ¶402). Charges arising out of this arrest and execution of the search warrant are pending against FERNANDEZ in the Circuit Court of Cook County.

338. On January 27, 2011, at approximately 6:27 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #1240) to FERNANDEZ. During this call, FERNANDEZ stated, "I'm with the guy [source of supply] already." ACEVEDO-MARCHAN asked, "Like at what time will you get here?" FERNANDEZ replied, "But right now I'm talking to him [source of supply], but he just told me that he had 50 cents [500 grams of heroin] and "CD" [believed to be one kilogram of heroin], but I want to still get the rest, the other "CD" [kilogram of heroin]. I don't know if I'll be able to lend you the dollar [100 grams of heroin]." Later in the call, ACEVEDO-MARCHAN stated, "Bring me the one with the whole dollar [100 grams of heroin]." FERNANDEZ replied, "I'll call you right now or we'll talk over there right now." At approximately 6:56 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #1250) to FERNANDEZ. During this call, FERNANDEZ stated that he was on his way to ACEVEDO-MARCHAN's residence.

339. On January 27, 2011, at approximately 8:27 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #1267) to BRIDGES. During this call, ACEVEDO-MARCHAN stated, "Hey, what's up, man? Hey, uh . . . my friend [FERNANDEZ] is here with me man, and uh . . . he says that the, that the . . . uh . . . he don't want to cut it. He got the whole thing [a whole kilogram of heroin], man." BRIDGES replied, "Oh, well we don't have that [money to purchase a whole kilogram of heroin], man, so tell him don't worry about it." ACEVEDO-MARCHAN stated, "He got the whole thing [whole kilogram of heroin]. He don't want to cut it in half [sell a portion of the kilogram of heroin]." BRIDGES replied, "Okay, well we don't . . . it's one guy [heroin customer] that want it. It ain't no group of motherfuckers, it's one guy." ACEVEDO-MARCHAN stated, "Okay, I'll call you back right now."

340. On January 27, 2011 at approximately 9:40 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #1279) to BRIDGES. During this call, ACEVEDO-MARCHAN stated, "Hey, uh . . . listen, my friend [FERNANDEZ] is right here with me. We're talking and all that shit, but listen, he wants the money [payment for drugs] first, so the other thing that he's . . ." BRIDGES asked, "The money first?" ACEVEDO-MARCHAN replied, "Yeah. They trust you, you trust me. We just come, me and you, and we do it [conduct the heroin transaction], if you want to do it. Then we do it tomorrow morning right away. But they [heroin source of supply] want the money [for the heroin] first, and we do it. Just me and you." BRIDGES then asked, "What do you mean, he want . . . he want to bring it [the heroin] over there [ACEVEDO-MARCHAN's residence]? Is that what he's doing?" ACEVEDO-MARCHAN replied, "No, no, he [FERNANDEZ] is going to bring it [the heroin] to . . . we're going to give him the money, and he's going to bring it [heroin] to me and you're going to be right here with me, but I deliver it [heroin] to you." BRIDGES responded, "Okay, what you're saying is we're going . . ." ACEVEDO-MARCHAN stated, "But they want the money [to purchase the heroin] up front. That's what I'm asking." BRIDGES replied, "Okay, well this ain't my money, so I mean, it ain't up to me. The only thing I can do is ask the guy [BRIDGES's heroin customer]."

341. On January 28, 2011, at approximately 9:41 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1299) from BRIDGES. During this call, ACEVEDO-MARCHAN stated, "I'm right here in the front [of BRIDGES' residence], open the door for me." BRIDGES replied, "Alright." Based on my knowledge of the investigation and the intercepted calls, I believe that, at this time, ACEVEDO-MARCHAN delivered to BRIDGES the heroin from FERNANDEZ and picked up the money from BRIDGES.

342. On January 28, 2011, at approximately 10:36 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1310) from BRIDGES. During this call, BRIDGES stated, "No go, man." ACEVEDO-MARCHAN subsequently asked, "No good?" BRIDGES responded, "No good, no [BRIDGES was unhappy with the heroin he purchased from FERNANDEZ]." ACEVEDO-MARCHAN then stated, "So you want to . . . you think you can get rid of that shit [the heroin]? I got your money. I haven't got to the house yet." BRIDGES responded, "Okay, well, bring it [the heroin] back, I don't want it." ACEVEDO-MARCHAN subsequently stated, "Okay, I'll go get it [the heroin]. I'll go back [to BRIDGES' residence] later, okay? Just give me a minute. Just give me a minute, Okay?" BRIDGES replied, "Alright, man."

343. On January 28, 2011, at approximately 11:03 a.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1321) from BRIDGES. During this call, BRIDGES asked, "How long are you going to be, man [to pick up the heroin and return the money]?" ACEVEDO-MARCHAN replied, "I haven't got to the house. As soon as I get to the house. I'll be back [to BRIDGES' residence] in a hour, okay?" BRIDGES responded, "Alright." ACEVEDO-MARCHAN stated, "Alright, I'll be back. I still got that money in the pocket, man. I haven't touched yet. Okay, so I'll give it [money] back to you the way I brought it."

344. On January 28, 2011, at approximately 12:18 p.m., surveillance observed ACEVEDO-MARCHAN, driving his white Dodge Durango, arrive at **the 7922 South Carpenter Residence**, exit the Dodge Durango and enter **the 7922 South Carpenter Residence**. At approximately 12:23 p.m., surveillance observed ACEVEDO-MARCHAN exit the residence carrying a small package in his hand, re-enter the Dodge Durango and depart the area.

345. On January 28, 2011, at approximately 2:31 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1361) from FERNANDEZ. During this call, ACEVEDO-MARCHAN stated, "Those guys [BRIDGES] . . . I took it [the heroin] to them, dude, and they didn't like it and returned it back, dude. He said it's too low [the heroin is too diluted], dude." FERNANDEZ responded, "No problem." ACEVEDO-MARCHAN then stated, "I have it [the heroin] here, dude. We'll see if . . . I'm trying somewhere else to get rid of it [trying to find someone else to buy the heroin]. If not, come by for it [the heroin], okay?"

G. ALSHAWNTUS BECK

1. BECK Conspires With FLORES to Distribute A Kilogram of Heroin on March 22, 2011

346. Based on the wire interceptions described below, I believe that, on March 22, 2011, BECK sought to purchase a kilogram of cocaine from FLORES, which FLORES fronted in part until BECK sold the cocaine to his customer. Later that same day, BECK complained that the quantity was only 982 grams.

347. On March 22, at approximately 12:39 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #474) to BECK.³⁶ During this call, BECK asked, "Uh . . . what time you meet

³⁶The identification of BECK and his voice in this Affidavit is based in part on the following: On May 9, 2011, at approximately 7:49 p.m., the user of telephone number (773) 367-2400, had a telephone conversation with FLORES, in which FLORES stated that he was at "school," which is a frequent meet location for BECK and FLORES, located in the 4800 Block of West Shakespeare, Chicago, Illinois, near an elementary school. The user of telephone number (773) 302-9433 responded, "Five minutes. I'll be there in five minutes." At approximately 7:57 p.m., surveillance observed BECK's maroon **Nissan Maxima** arrive and park in the 4800 Block of West Shakespeare. At approximately 8:00 p.m., a GPS "ping" of telephone number (773) 367-2400, placed the phone in the immediate area of the 4800 Block of West Shakespeare. Beginning at approximately 8:03 p.m., surveillance observed the following: FLORES's **Toyota Tacoma** arrive; FLORES and two unidentified individuals exit the **Toyota Tacoma**; BECK (previously identified from his Illinois driver's license) exit the maroon **Nissan Maxima**, and engage in conversation with FLORES and the two unidentified individuals. At approximately 8:14 p.m., surveillance observed FLORES and the other two individuals re-enter the **Toyota Tacoma**, BECK re-enter the maroon **Nissan Maxima**, and then both vehicles departed the area; two minutes later, a GPS "ping" of telephone number (773) 367-2400, placed the phone approximately one mile southwest of the

me?” FLORES replied, “I’ll see you at two o’clock.” BECK stated, “Okay.” FLORES continued, “I first talk to you [FLORES wants to meet BECK before conducting a heroin transaction], okay?” BECK stated, “Okay.”

348. On March 22, 2011, at approximately 1:54 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call ##481-482³⁷) to Individual J. During this call, Individual J asked, “Are you going to need what you told me about [heroin]?” FLORES replied, “Yes.” Individual J stated, “You know where [to acquire the heroin] already. Pass by later on. I’ll call you at 4:00, and pass

4800 Block of West Shakespeare. On May 11, 2011, at approximately 2:14 p.m., a GPS “ping” of telephone number (773) 367-2400 placed the phone in the area of 6600 West Fullerton Avenue, Chicago, Illinois, which is where the parking lot for an Old Country Buffet restaurant, next to an Aldi’s, is located; at approximately 2:24 p.m., the user of telephone number (773) 367-2400 had a conversation with FLORES in which telephone number (773) 367-2400 stated, “Okay, I’m right here. I’m at the Old Country Buffet . . . right by Aldi’s, restaurant Old Country. I leave. I’ll be there in two minutes.” Beginning at approximately 2:31 p.m., surveillance observed the following: FLORES and another individual exit Aldi Foods, located next to Old Country Buffet at 6560 West Fullerton, Chicago; BECK standing next to his maroon **Nissan Maxima**, which was parked in the Old Country Buffet parking lot; FLORES approach BECK; BECK open the passenger side door of the **Nissan Maxima** and reach inside the vehicle; BECK and FLORES continue to engage in conversation; a short time later, BECK enter the driver’s side of the **Nissan Maxima** and FLORES enter the front passenger seat of the vehicle. At approximately 2:41 p.m., while FLORES and BECK were still in the car, FLORES, using Target Phone 1, placed a call to TORRES-TELLEZ (Call #607), in which BECK can be heard in the background of Target Phone 12 saying, “Everything.” Between 2:45 p.m. and 3:01 p.m., three separate GPS “pings” of telephone number (773) 367-2400, placed the phone in the immediate vicinity of the Old Country Buffet parking lot. At approximately 3:08 p.m., surveillance observed FLORES exit the maroon **Nissan Maxima**, and BECK departed in the **Nissan Maxima**. At approximately 3:16 p.m., a GPS “ping” of telephone number (773) 367-2400 placed the phone approximately two miles south of Old Country Buffet. Law enforcement officers have conducted voice comparisons of the individual using telephone numbers (312) 348-9203, (773) 302-9433, and (773) 367-2400, and the person overheard in the background of Target Phone 12 on May 11, 2011, when BECK and FLORES were in BECK’s car together, and identified the voices as the same individual. Based on the above information, law enforcement officers have identified BECK as the user of telephone numbers (312) 348-9203 (773) 302-9433, and (773) 367-2400. In the summaries of the intercepted calls in this Affidavit in which BECK is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to BECK in each of these summaries is the same.

³⁷ Push-to-Talk calls often occur in multiple sessions.

by there. I'll call you and let you know when you can go by. Okay? Go to the same place as yesterday." FLORES stated, "Okay."

349. On March 22, 2011, at approximately 2:00 p.m., FLORES, using Target Phone 9, received an incoming call (Call #485) from BECK. During this call, FLORES asked, "Where you at?" BECK replied, "I'm by Narragansett." FLORES then asked, "Where you see me [where do you want to meet]?" BECK replied, "Burger King." FLORES responded, "Okay, give me a couple of minutes."

350. On March 22, 2011, at approximately 4:13 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #503) to Individual J. During this call, Individual J stated, "Pass by [the location where the heroin is being stored] already, okay?" FLORES replied, "Okay, give me some time. I'll be right over."

351. On March 22, 2011, at approximately 4:14 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call ##504-505) to BECK. During this call, FLORES stated, "Okay [FLORES indicates that he is ready to conduct the heroin transaction with BECK]." BECK replied, "I'm leaving the house now, so give me 20 minutes. I'll call you." FLORES responded, "Man, they [the heroin sources of supply] are waiting on me, man." BECK stated, "Hey, everything okay. I got to go back to my car, so . . . it's traffic." FLORES replied, "Okay."

352. On March 22, 2011, at approximately 4:21 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #506) to Individual J. During this call, Individual J asked, "What happened?" FLORES replied, "In about 15 minutes I'll be around there [the location where the heroin is being stored]."

353. Approximately fifteen minutes later, at approximately 4:36 p.m., FLORES, using Target Phone 9, received an incoming call (Call #507) from Individual K. During this call, FLORES told Individual K, "I'm outside already." Approximately one minute later, at 4:37 p.m. FLORES placed an outgoing call (Call #508) to Individual J, and stated, "He [Individual K] saw me already. I'm here [at the location where the heroin is being stored] already, okay?" Individual J replied, "Alright then. When you get back, call me." I believe that, at this time, FLORES picked up the heroin from Individual J to distribute to BECK.

354. On March 22, 2011, at approximately 6:07 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #521) to BECK. During this call, FLORES stated, "Hey, park in here. Park in here. Park in here. Yeah." I believe that, based upon my knowledge of the investigation and the intercepted calls, FLORES delivered the heroin to BECK.

355. On March 22, 2011, at approximately 6:35 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call ##524-526,) to BECK. During this call, BECK stated, "Hey man, nine hundred eighty two dollars [the heroin BECK received from FLORES weighed 982 grams instead of a whole kilogram]." FLORES replied, "No, no." BECK stated, "Okay, I'll bring it [the heroin] back then. Same place [BECK will meet FLORES at the same location at which he acquired the heroin]." FLORES asked, "You're saying 982 [982 grams of heroin]?" BECK reiterated, "Nine hundred eighty two dollars [982 grams of heroin]. If you want me to bring it [the heroin] back, I'll bring it back."

356. Approximately one minute later, FLORES, using Target Phone 9, placed an outgoing call (Call #527) to Individual J. During this call, FLORES stated, "The dude [BECK] has it already, but it's 982 pesos [982 grams], okay?" Individual J replied, "Don't bullshit." FLORES continued,

“Yeah, he [BECK] said he would bring it [the heroin] to show it to you.” Individual J stated, “No, let me call the man [heroin source of supply].” FLORES stated, “Okay call him [the heroin source of supply] if you want. If he [the source of supply] doesn’t believe you, we’ll bring it [the heroin] and take it to him if he wants, okay? I just finished doing it [conducting the heroin transaction with BECK], but uh . . . they [BECK] are telling me that it’s 982 pesos [the heroin weighs 982 grams].” Individual J replied, “86. You told me 986 [grams of heroin].” FLORES replied, “No, 82 [982 grams].” Individual J stated, “That [the 18 grams of heroin missing from the kilogram] is a whole lot, dude.” FLORES again stated, “Yeah, he [BECK] says that if we don’t believe him, he will bring it [the heroin] back so we can see.” Individual J stated, “I’m going to call the man [heroin source of supply].” I’ll call right now. But he [BECK] gave you everything [the money used to purchase the heroin] already?” FLORES stated, “No, not everything [not all of the money], but I’ll take care of it. Don’t worry about that. He didn’t give it all [all of the money] to me, but I’ll take care of it.” Individual J responded, “Alright then. That’s good.”

357. On March 22, 2011, at approximately 6:15 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #531) to BECK. During this call, BECK stated, “Hey, this guy [BECK’s heroin customer] is going to see me now [to acquire the heroin from BECK and give BECK money], and I’m gonna come to you [to give FLORES the money for the heroin]. So, give me 15, 20 minutes.”

358. On March 22, 2011, at approximately 10:08 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #561) to BECK. During this call, FLORES stated, “You’re too much bullshit, man [FLORES is upset that BECK has not yet brought the money to pay for the heroin].” BECK replied, “Hey man, just sit right there. I’m going your way now. I’ll be there in seven

minutes.” FLORES stated, “Oh, no problem, okay. I see you tomorrow, man.” BECK responded, “No, not tomorrow. Come now, because I’m already close. I see you now. Come now to Applebee’s. I’ll be there in seven minutes.”

359. On March 22, 2011, at approximately 10:23 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #563) to BECK. During this call, FLORES stated, “Come here, here in the Burger King, okay?” BECK asked, “Who?” FLORES repeated, “Burger King.” BECK replied, “Oh, okay, okay.” Based on my knowledge of the investigation and the intercepted calls, I believe that shortly after this call, BECK and FLORES met, and BECK provided FLORES with additional money to pay for the heroin.

360. On March 22, 2011, at approximately 10:48 p.m., FLORES, using Target Phone 9, placed an outgoing call (Call #577) to BECK. During this call, BECK asked, “What did you come up with [BECK asks if FLORES has counted the money BECK gave him in exchange for the heroin]?” FLORES replied, “Give me one hour. I go now for North side. Give me one hour, please [to get to a place where FLORES can count the money].”

361. On March 22, 2011, at approximately 11:32 p.m., FLORES, using Target Phone 9, received an incoming (Call #579) from BECK. During this call, FLORES stated, “Hey man . . . too much short, man [the money BECK exchanged for the heroin was short].” BECK asked, “What, man?” FLORES stated, “Only ten [an undetermined amount of money was missing].” BECK replied, “I’ll meet you tomorrow morning, man. Uh . . . let’s say twelve o’clock.” FLORES stated, “Okay.”

2. BECK Purchases Approximately 908 Grams of Heroin from the FLORES DTO on May 14, 2011

362. Based on the wire interceptions described below, I believe that, on May 14, 2011, FLORES arranged to distribute a kilogram of heroin to BECK, by having Individual L deliver the heroin at FLORES's instruction. FLORES and BECK met, and then FLORES had Individual L deliver the heroin to BECK. Shortly after Individual L delivered the heroin to BECK, BECK called FLORES to report that the heroin did not weigh the full kilogram, but weighed only 908 grams.

363. On May 13, 2011, at approximately 2:11 p.m., FLORES, using Target Phone 12, received an incoming call (Call #674) from BECK, who was using telephone number (773) 367-2400. During this call, FLORES stated, "I'm here for my buddy [Individual L, a narcotics associate of FLORES]. I'm here and he say I need maybe . . . I need . . . only, only half first [FLORES needs only half of the purchase money up front for a kilogram of heroin], I need half." BECK replied, "Alright, man. I'll call you, okay."

364. On May 14, 2011, at approximately 3:32 p.m., FLORES, using Target Phone 12, received an incoming call (Call ##720-721) from BECK. During this conversation, BECK asked, "Where [are] you?" FLORES replied, "Give me 20 minutes. In the same [meeting location], or no?" BECK replied, "Yeah." FLORES then stated, "20 minutes in the same [location]. 'School' [a frequent meet location for BECK and FLORES, in the 4800 Block of West Shakespeare, near an elementary school, where surveillance has observed FLORES and BECK meet on other occasions]." On May 14, 2011, at approximately 4:02 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #922) to Individual L. During this call, FLORES stated, "The thing is, this guy [BECK] is waiting for me there. And I'm going to go see him." Individual L asked, "Where?" FLORES replied, "Here on 'School' [meet location]. I'm going to see him. I have your truck. I didn't want

to take it, but I'm in it, and since I'm close by I might as well go see him." Individual L replied, "Go ahead. No problem. I'm here at the house."

365. Beginning at approximately 3:55 p.m., surveillance observed the following: (a) BECK, driving his 2011 maroon **Nissan Maxima**, arrived and parked near the intersection of Shakespeare and Lamon Streets, located at approximately 4800 West Shakespeare Avenue; (b) at approximately 4:00 p.m., FLORES, driving the **Silver Nissan Pathfinder**, registered to Individual L, arrived and parked directly behind BECK's vehicle; (c) BECK exited his vehicle, carrying a medium-size package, and entered the front passenger seat of FLORES's vehicle. At approximately 4:02 p.m., a GPS "ping" of telephone number (773) 367-2400, placed the phone in the immediate area of the 4800 Block of West Shakespeare Avenue. Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that at this time, BECK brought FLORES half the money to pay for the heroin.

366. On May 14, 2011, at approximately 4:13 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #924) to Individual L. During this call, FLORES stated, "Do you remember the shoes? The shoes over at the Burger King [FLORES refers to a shoe store located in the Brickyard Mall]?" Individual L replied, "Yeah." FLORES stated, "Why don't you come with the tools to fix that door [heroin, intended for BECK]." Individual L responded, "Alright then." FLORES continued, "Bring over all the tools [a whole kilogram of heroin], okay? I'll wait for you there [at the shoe store]. I'll be there." Individual L stated, "Alright."

367. On May 14, 2011, at approximately 4:27 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #928) to Individual L. During this call, FLORES stated, "If you want, come over here [where FLORES was parked] and leave that [the heroin] there." Individual L

replied, “No, the car is parked here already. I think that it’s better [to do the heroin transaction] here. I’m in between cars [providing cover], and since I have it [the kilogram of heroin] in a bag. Yeah, wrapped up with a shirt is fine.” FLORES stated, “Alright.” On May 14, 2011, at approximately 4:32 p.m., a GPS “ping” of telephone number (773) 367-2400, placed the location of the telephone in the vicinity of the Brickyard Mall, located at Narragansett and Fullerton. Based on my knowledge of the investigation, the intercepted calls and the surveillance, I believe that Individual L had met BECK at the Brickyard Mall, where Individual L had delivered the heroin to BECK, and that FLORES had been parked nearby.

368. On May 14, 2011, at approximately 4:38 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #930) to Individual L. During this call, FLORES asked, “Done [with the heroin transaction with BECK] or what?” Individual L replied, “Yes. I’m here on Gregory and Narragansett.” FLORES stated, “I was waiting for you here.” Individual L stated, “No, I couldn’t go in reverse. I had a car right behind me. I thought you had seen me.” FLORES stated, “I saw the people [BECK and his associate] get in [Individual L’s vehicle]. They didn’t get in?” Individual N replied, “No, he [BECK] just got in to give me the things [the remaining half of the purchase price for the heroin] and that’s it.” FLORES responded, “Alright then.”

369. On May 14, 2011, at approximately 4:51 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call ##729-730) to BECK. During this call, BECK asked, “Where you?” FLORES replied, “The same [location].” BECK stated, “Okay, I come.” FLORES then asked, “You [coming] back right now or what?” BECK stated, “Yeah.”

370. On May 14, 2011, at approximately 4:55 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #931) to Individual L. During this call, FLORES stated, “This guy

[BECK] wants us to see him right now. Over there at the same place. At the shoes [the shoe store].” Individual L replied, “I’ll go if you want.” FLORES asked, “But did he [BECK] give you something [money] there?” Individual L responded, “Yes.” FLORES then asked, “Should we leave that [the vehicle containing the money received from BECK] around there, and we’ll go in this one [FLORES’ vehicle]? What do you think? Or, you give it [the money] to me so you go by yourself [to meet BECK] with nothing [no money in the car]?” Individual L stated, “Alright. I’m here at the intersection.” FLORES replied, “I’m on my way.”

371. On May 14, 2011, at approximately 5:00 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call #732) to BECK. During this call, FLORES stated, “Hey, [Individual L] is there [at Brickyard Mall], okay?” BECK replied, “Okay.”

372. On May 14, 2011, at approximately 5:30 p.m., FLORES, using Target Phone 13, placed an outgoing call (Call #9369) to Individual L. During this call, Individual L stated, “He [BECK] did arrive, but I already left. I didn’t call you because he just got there and told me that 908 is all it had [BECK told Individual L that the heroin he received earlier that day weighed only 908 grams].” FLORES asked, “Nine-eight?” Individual L repeated, “Nine-eight.” FLORES replied, “Alright.”

373. On May 14, 2011, at approximately 5:41 p.m., FLORES, using Target Phone 12, placed an outgoing call (Call ##739-740) to BECK. During this call, FLORES asked, “Yeah, how many [FLORES asks if BECK determined the weight of the heroin he received from Individual L]?” BECK replied, “Uh . . . what [Individual L] told you.” FLORES stated, “[Individual L] . . . don’t understand, man.” BECK then stated, “Uh . . . zero eight [908 grams of heroin].” FLORES replied, “No, man. No.” BECK then stated, “Okay, I come back. No problem. I come back, I show you

[BECK indicates that he will show the heroin to FLORES, in order to prove that it only weighed 908 grams].”

374. On May 14, 2011, at approximately 6:02 p.m., FLORES, using Target Phone 12, received an incoming call (Call #745) from BECK. During this call, BECK stated, “[I’ll] talk to you. Everything [is] cool. I’ll talk to you.” FLORES asked, “Everything good?” BECK replied, “Yeah. I talk to you.” FLORES stated, “Okay.”

VI. PROBABLE CAUSE FOR REQUESTED SEARCH WARRANTS

375. As set forth in this affidavit, it is believed the facts establish probable cause that the defendants did commit violations of Title 21, United States Code, Section 841 and Title 21, United States Code, Section 846.

376. This affidavit is also made for the purpose of establishing probable cause in support of warrants to search four residences, as further described below and in Attachment A for each requested search warrant, to seize the records, documents, and items described in ¶395. The residences are located at:

- a. 7922 South Carpenter Street, Chicago, Illinois (stash house of BLOUNT-BRIDGES DTO);
- b. 1920 North Karlov Avenue, Chicago, Illinois (residence of FERNANDO ACEVEDO-MARCHAN);
- c. 4910 West Medill Avenue, Chicago, Illinois (stash house of FLORES DTO);
- d. 2615 East 73rd Street, Chicago, Illinois (residence of DOMINGO BLOUNT);

377. As set forth in this affidavit, it is believed the facts establish probable cause that the records, documents, and items (as further described in ¶395) constitute fruits, instrumentalities

and/or evidence of violations of Title 21, United States Code, Section 841 and Title 21, United States Code, Section 846, and further that a search of the four residences, as further described below, will result in the discovery of such records, documents, and items.

378. As a result of my law enforcement experience and this investigation, I am familiar with the ways in which the members of the narcotics and money laundering organization conduct their business, including, but not limited to, their methods of importing and distributing major narcotics, such as heroin and cocaine, their use of numerical codes and code words to conduct their transactions in secret, and their methods of laundering the proceeds of their narcotics trafficking. Through my experience and my discussions with other experienced law enforcement officers, I am familiar with the methods, schemes, and operations used by major heroin traffickers and know:

a. It is common practice for drug traffickers, including persons trafficking in heroin and cocaine, to conceal in their residences and/or places of business, secure places to store the contraband, including but not limited to safes, and that once a sizeable load of contraband has been delivered, to repackage and break-down larger quantities of illegal drugs into smaller more easily handled and concealed quantities for distribution; and that paraphernalia related to the packaging, cutting, weighing and distribution of contraband is usually secreted or stored in their residences and/or places of business.

b. Drug traffickers, including persons trafficking in substances such as heroin and cocaine, maintain books, records, receipts, notes, ledgers, airline tickets, money orders, and other papers relating to the purchase, packaging, sale, distribution, and transportation of their product.

c. Drug traffickers, including persons trafficking in substances such as heroin and cocaine, commonly maintain books, papers, and cellular telephones which reflect the names, addresses and/or telephone numbers of their suppliers, couriers, customers, and other associates in the illegal drug trade.

d. Drug traffickers, including persons trafficking in substances such as heroin and cocaine, conceal in their residences and/or places of business the proceeds of their illegal activity, including large amounts of United States currency, financial instruments, precious metals, jewelry, rare coins, works of art, and other items of value, as well as books and records regarding the acquisition, use, and disposition of such items of value.

e. When drug traffickers, including persons trafficking in substances such as heroin and cocaine, amass large proceeds from the sale of controlled substances, they attempt to legitimize these profits through money laundering activities, often accomplishing this goal by using the services of banks, securities brokers, professionals such as attorneys and accountants, casinos, real estate brokers and other financial professionals, shell corporations and business fronts, and otherwise legitimate businesses which generate large quantities of currency.

f. It is common for drug traffickers, including persons trafficking in substances such as heroin and cocaine, to maintain the aforementioned books, papers, and documents in secure places within their residences and/or places of business so that the drug traffickers have ready access to such information.

g. Drug traffickers, including persons trafficking in substances such as heroin and cocaine, often places assets, including real and personal property, such as vehicles, in names other than their own to avoid the detection and forfeiture of such assets by government agencies; and

that the drug traffickers continue to use these assets and to exercise dominion and control over them even though the assets are nominally owned by others.

h. Drug traffickers, including persons trafficking in substances such as heroin and cocaine, frequently possess firearms and ammunition to protect their illegal product.

i. Drug traffickers, including persons trafficking in substances such as heroin and cocaine, to frequently keep the records described above on computers, and use personal data assistants (PDAs), telex machines, facsimile machines, currency counting machines and telephone answering machines to generate, transfer, count, record and store information pertaining to their trafficking activity and the proceeds of that activity.

j. Drug traffickers frequently take, or cause to be taken, photographs of themselves, their associates in the drug trade, property acquired from the distribution of drugs, and their product, and such photographs are often kept in their residences and/or places of business.

379. In addition, during the course of residential searches, I and other agents have also found items of personal property that tend to identify the person or persons in residence, occupancy, control, or ownership of the subject premises, including such items as canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, or other mail, statements, identification documents and keys.

380. For the foregoing reasons, and for the reasons set forth below in the discussion of probable cause to search, there is probable cause to believe that the four residences described below will contain the items requested to be seized as set forth below in ¶395.

A. Probable Cause To Search the 7922 South Carpenter Residence

381. Records obtained during the course of the investigation and related surveillance indicate that **the 7922 South Carpenter Residence** is a stash house used by the BLOUNT-BRIDGES DTO, as summarized below:

a. According to records obtained from Commonwealth Edison, BRIDGES was listed as the utility account holder for **the 7922 South Carpenter Residence** until approximately May 21, 2010. There is currently no active customer listed on the account for **the 7922 South Carpenter Residence**.

b. A search of the Lexis/Nexis computer database reflects that BRIDGES has used this address for commercial purposes between August 2009 and December 2009. The database also reflects that Individual M has used this address for varying purposes from 1997 to the present time, including that Individual M has a driver's license issued in his name at the 7922 S Carpenter Street, Chicago, Illinois, and also has a Jeep Wrangler registered to his name at this address. On August 10, 2010, law enforcement officers observed BRIDGES driving that particular Jeep Wrangler, as set forth in note 13, above.

c. During this investigation, surveillance agents have observed BRIDGES and known vehicles for BRIDGES at **the 7922 South Carpenter Residence** on at least fifteen occasions, beginning on August 27, 2010, and as recently as June 7, 2011, at 11:28 a.m., when agents observed BRIDGES arrive at and enter **the 7922 South Carpenter Residence**.

d. Subject Phone 16 is a phone used by BRIDGES. Information obtained from GPS Pings of Subject Phone 16 on June 3, 2011, conducted approximately every 15 minutes between 2:07 a.m. and 10:23 a.m. revealed that Subject Phone 16 was located in the area of **the 7922 South Carpenter Residence** the entire time period. Furthermore, on June 3 and 4, 2011, between

approximately 11:22 p.m. and 10:07 a.m., GPS Pings of Subject Phone 16 revealed that the phone was located in the area of **the 7922 South Carpenter Residence** the entire time period. Finally, on June 4 and 5, 2011, between approximately 11:06 p.m. and 9:22 a.m., GPS Pings of Subject Phone 16 revealed that the phone was located in the area of **the 7922 South Carpenter Residence** the entire time period.

382. During this investigation, DEA has learned that the BLOUNT-BRIDGES DTO has used **the 7922 South Carpenter Residence** to conduct drug trafficking activities. For example:

a. On December 17, 2010, the BLOUNT-BRIDGES DTO purchased a half-kilogram of heroin from the FLORES DTO. ACEVEDO-MARCHAN and an unknown male delivered the heroin to BRIDGES and BLOUNT at **the 7922 South Carpenter Residence**. A few minutes later, a courier for FLORES picked up the money for the heroin from BLOUNT in the front of **the 7922 South Carpenter Residence**. A few minutes after this exchange, ACEVEDO-MARCHAN informed FLORES that the heroin transaction was complete. *See ¶¶ 168-185.*

b. On January 28, 2011, the BLOUNT-BRIDGES DTO purchased 100 grams of heroin from FERNANDEZ, in a deal brokered by ACEVEDO-MARCHAN. ACEVEDO-MARCHAN obtained the heroin from FERNANDEZ, and brought it to BRIDGES, where he picked up the money for the heroin from BRIDGES. A short time later, BRIDGES complained about the quality of the heroin, and ACEVEDO-MARCHAN went to **the 7922 South Carpenter Residence**, where he returned the money and took back the heroin. When ACEVEDO-MARCHAN left **the 7922 South Carpenter Residence**, he was carrying a small package in his hand. *See ¶¶ 335-345.*

c. On February 18, 2011, the FLORES DTO distributed two kilograms of cocaine to the BLOUNT-BRIDGES DTO, in a deal brokered by ACEVEDO-MARCHAN.

FLORES and ACEVEDO-MARCHAN delivered the cocaine to BRIDGES in two deliveries. In the morning, BRIDGES' customer, Mixon, came to **the 7922 South Carpenter Residence**, to wait for the cocaine delivery. Shortly thereafter, FLORES and ACEVEDO-MARCHAN arrived at **the 7922 South Carpenter Residence** to deliver the cocaine. When Mixon left **the 7922 South Carpenter Residence**, law enforcement made an investigative stop on Mixon, and seized approximately 500 grams of cocaine. *See ¶¶ 239-258.*

383. **The 7922 South Carpenter Residence** is a one-story residence with red and brown brick around the entire residence. The premises contains a black iron fence around the front yard with a gate in the fence leading up the stairs to the front door. The numbers "7922" are in gold color on a black sign that is located directly north of the front door. The front door of the premises consists of one glass/aluminum door, behind which is a greenish-colored wood door. The front of the premises has one large window in five sections, located on the main level of the residence. The premises also contains a detached two-car garage directly west of the residence.

B. Probable Cause To Search the 1920 North Karlov Residence

384. Records obtained during the course of the investigation and related surveillance indicate that **the 1920 North Karlov Residence** is ACEVEDO-MARCHAN's primary residence, as summarized below:

a. A law enforcement database inquiry revealed that ACEVEDO-MARCHAN has a current Illinois driver's license and a current Illinois identification card both issued under the name of Fernando Acevedo at **the 1920 North Karlov Residence**. Also, according to the Lexis/Nexis computer database, ACEVEDO-MARCHAN resides at **the 1920 North Karlov Residence**.

b. According to utility records, utilities for **the 1920 North Karlov Residence** are in the name of an individual who shares the same last name as ACEVEDO-MARCHAN, and, based upon that individual's birth date appearing in commercial databases, is believed to be the mother of ACEVEDO-MARCHAN. Moreover, during an intercepted call (Call #5404) over Target Phone 4, a telephone used by ACEVEDO-MARCHAN, a female called Commonwealth Edison and reported a power outage, providing her name, which, based on intercepted calls, is the same name as the female believed to be the wife or girlfriend and the mother of the child of ACEVEDO-MARCHAN. The female reporting the power outage also provided an address of 1920 North Karlov, and advised that the account was listed under the name of the female who is believed to be the mother of ACEVEDO-MARCHAN.

c. During this investigation, surveillance agents have observed ACEVEDO-MARCHAN and known vehicles for ACEVEDO-MARCHAN at **the 1920 North Karlov Residence** on multiple occasions, including as recently as June 3, 2011, when agents observed ACEVEDO-MARCHAN in the backyard of **the 1920 North Karlov Residence**.

385. During this investigation, DEA has learned that ACEVEDO-MARCHAN has used **the 1920 North Karlov Residence** to conduct the drug trafficking activities of the FLORES DTO. For example:

a. On October 3, 2010, the BLOUNT-BRIDGES DTO purchased 600 grams of heroin from the FLORES DTO, in a deal brokered by Gambino and ACEVEDO-MARCHAN. On October 2, 2010, BRIDGES met with Gambino, ACEVEDO-MARCHAN and FLORES at **the 1920 North Karlov Residence**, to pick up the heroin, but the FLORES DTO declined to break up a whole kilogram of heroin to provide the BLOUNT DTO with 600 grams. On October 3, 2010, the

FLORES DTO agreed to provide the BLOUNT DTO with the 600 grams of heroin, and BRIDGES, FLORES and Gambino returned to **the 1920 North Karlov Residence**, where BRIDGES picked up the 600 grams of heroin. Following the meeting, ACEVEDO-MARCHAN called Gambino to inquire if the BLOUNT-BRIDGES DTO was satisfied with the quality of the heroin. *See* ¶¶ 80-102.

b. On October 20, 2010, the BLOUNT-BRIDGES DTO purchased 800 grams of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. FLORES delivered the heroin to **the 1920 North Karlov Residence** and, shortly thereafter, BRIDGES went to FLORES enter **the 1920 North Karlov Residence**, where he picked up the heroin. *See* ¶¶ 103-110.

c. On October 25, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. FLORES delivered the heroin to **the 1920 North Karlov Residence**. Soon thereafter, BRIDGES picked up the heroin at **the 1920 North Karlov Residence**, while BLOUNT and CHARLES THOMAS conducted security around **the 1920 North Karlov Residence**. *See* ¶¶ 111-127.

d. On November 1, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the ANGEL HERNANDEZ DTO, in a deal brokered by ACEVEDO-MARCHAN. BRIDGES and CHARLES THOMAS, with BLOUNT acting as security, went to **the 1920 North Karlov Residence**, where they met with ANGEL HERNANDEZ, and picked up the heroin. *See* ¶¶ 307-317.

e. On November 3, 2010, the BLOUNT-BRIDGES DTO purchased 500 grams of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. On November

3, 2010, BLOUNT and BRIDGES went to **the 1920 North Karlov Residence**, where they met with FLORES and picked up the heroin. *See* ¶¶ 128-138.

f. On November 6, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. FLORES delivered the kilogram of heroin to ACEVEDO-MARCHAN at **the 1920 North Karlov Residence**, and then BLOUNT, BRIDGES and CHARLES THOMAS, acting as surveillance, drove to **the 1920 North Karlov Residence**, where BRIDGES met with FLORES and picked up the heroin. *See* ¶¶ 139-155.

g. On November 24, 2010, the BLOUNT-BRIDGES DTO purchased a kilogram of heroin from the FLORES DTO, in a deal brokered by ACEVEDO-MARCHAN. FLORES brought the kilogram of heroin to **the 1920 North Karlov Residence**, and then BLOUNT and BRIDGES picked up the heroin at **the 1920 North Karlov Residence**. *See* ¶¶ 156-167.

h. On February 18, 2011, the FLORES DTO delivered two kilograms of cocaine to the BLOUNT-BRIDGES DTO, in two separate deliveries. In the morning of February 18, 2011, FLORES went to **the 1920 North Karlov Residence** and exited a few minutes later with ACEVEDO-MARCHAN, and, from there, they brought the cocaine to BRIDGES. *See* ¶¶ 239-258.

i. On June 5, 2011, intercepted calls over Target Phone 15, used by ACEVEDO-MARCHAN, indicated that ACEVEDO-MARCHAN would be brokering a transaction between ACEVEDO-FITZ and BRIDGES for 50 grams of heroin. Based on further intercepted calls, and GPS pings of Subject Phone 16, used by BRIDGES, law enforcement officers believe that this transaction occurred at **the 1920 North Karlov Residence** between approximately 11:10 a.m. and 11:25 a.m. on June 5, 2011.

386. **The 1920 North Karlov Residence** is a three-story, multi-unit residence located at 1920 North Karlov Avenue, Chicago, Illinois. The premises has varying shades of brick around the entire building, except for light-blue aluminum siding around the wood deck in the rear of the residence. The premises contains a black iron gate around the front of the residence and a dark-colored wood fence around the south side of the residence. The premises has a concrete staircase leading up to the second level front door, which appears to be made of white wood with glass in the center. The numbers "1920" are affixed in white and are located on the porch that covers the area leading to the second-level front door. The front of the premises has three front windows on the second level and three more front windows on the third level. The rear of the premises has a black iron gate, which leads to a concrete parking area in the back yard of the premises. The rear of the premises has a wooden staircase, which leads to a wood deck, with access to both the second and third levels of the premises to be searched.

387. Finally, DEA has learned based on surveillance and intercepted phone calls that ACEVEDO-MARCHAN resides on the first level, an individual believed to be ACEVEDO-MARCHAN's son, Individual N, resides on the second level, and both ACEVEDO-MARCHAN and Individual N have access to the basement/garden level of the building. Furthermore, surveillance and intercepted phone calls indicate that ACEVEDO-MARCHAN and Individual N use each level of **the 1920 North Karlov Residence** for drug-related purposes. For example:

a. On October 26, 2010, at approximately 5:17 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #5181) to Individual N. During this call, ACEVEDO-MARCHAN asked, "Where did you say the scale [to weight drugs] was at?" Individual N replied, "In the drawer." ACEVEDO-MARCHAN asked, "In the second floor?" Individual N

replied, "Yeah." ACEVEDO-MARCHAN asked, "Where? By where?" Individual N stated, "In the first floor [bottom level]. In the first floor. In the second . . . first drawer." ACEVEDO-MARCHAN remarked, "Okay."

b. On October 29, 2010, at approximately 6:40 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #8349) to Individual N. During this call, ACEVEDO-MARCHAN asked, "Hey, where is the scale [to weigh drugs]?" Individual N advised, "It [scale] is upstairs [top floor of **the 1920 North Karlov Residence**]. Tell Abuelo [nickname for ACEVEDO-MARCHAN's nephew] to give it [scale] to you. It [scale] is on my table."

c. On October 29, 2010, at approximately 7:28 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #8392) to Individual N. During this call, ACEVEDO-MARCHAN asked, "Where is that thing [scale]?" Individual N asked, "What? The scale?" ACEVEDO-MARCHAN asked, "They call it a measurer or a scale, right? That thing." Individual N advised, "Oh, then it [scale] is in the same place." ACEVEDO-MARCHAN asked, "Where?" Individual N stated, "Downstairs [the bottom level of **the 1920 North Karlov Residence**]." ACEVEDO-MARCHAN asked, "Is it open?" Individual N advised, "Yeah."

d. On November 12, 2010, at approximately 7:31 p.m., ACEVEDO-MARCHAN, using Target Phone 4, placed an outgoing call (Call #22073) to Individual N. During this call, ACEVEDO-MARCHAN asked, "Did you see the police in front [of **the 1920 North Karlov Residence**]?" Individual N asked, "For real?" Later in the call, ACEVEDO-MARCHAN stated, "You don't look out for anything. Keep an eye out the whole time, man." Individual N advised, "Yeah. I know. I see them [police]." Later in the call, ACEVEDO-MARCHAN asked,

"You put it [narcotics] downstairs [bottom level of **the 1920 North Karlov Residence**] already?"
Individual N advised, "Yes."

e. On January 29, 2011, at approximately 6:05 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #1497) from Individual N. During this call, Individual N asked, "Are you downstairs [at **the 1920 North Karlov Residence**]?" ACEVEDO-MARCHAN confirmed, "Yes." Individual N asked, "Do you still have that [narcotics]?" ACEVEDO-MARCHAN stated, "What your friend brought you [narcotic]?" ACEVEDO-MARCHAN confirmed, "Yes." Individual N stated, "I'll be right down [Individual N would come downstairs to see the narcotics]." ACEVEDO-MARCHAN remarked, "Okay."

f. On February 26, 2011, at approximately 5:26 p.m., ACEVEDO-MARCHAN, using Target Phone 6, received an incoming call (Call #4165) from Individual N. During this call, Individual N stated, "He's [drug supplier] going to bring you one [one unit of an unknown narcotic]." ACEVEDO-MARCHAN confirmed, "Okay, alright." Individual N asked, "A 20 [unknown amount], right?" ACEVEDO-MARCHAN asked, "Are you going to be . . . are you coming to the house [**the 1920 North Karlov Residence**]?" Individual N advised, "Later on." Later in the call, ACEVEDO-MARCHAN asked, "Do you want me to leave it [**the 1920 North Karlov Residence**] open . . . no, no, I'll lock the door, you got the keys to upstairs [top level of **the 1920 North Karlov Residence**], right?" Individual N replied, "Uh, yeah."

g. On April 4, 2011, at approximately 12:37 p.m., ACEVEDO-MARCHAN, using Target Phone 6, placed an outgoing call (Call #7511) to Individual N. During this call, ACEVEDO-MARCHAN stated, "Come down here [to the second level of **the 1920 North Karlov Residence**] when you are done eating. I'm going to give you something [narcotics] so you can put

it [narcotics] away for me. Tell my mom to come. Ask her [ACEVEDO-MARCHAN's mother] if she wants to get the rent money [for **the 1920 North Karlov Residence**]." Individual N confirmed, "Okay."

h. On June 9, 2011, at approximately 6:42 p.m., ACEVEDO-MARCHAN, using Target Phone 15, placed an outgoing call (Call #2942) to Individual N. During this call, ACEVEDO-MARCHAN asked, "Look, do you want me to give you a little bit of that [narcotics]? Come, so you can bring it. Chucho [narcotics associate] has it [narcotics] there [**the 1920 North Karlov Residence**]." Later in the call, ACEVEDO-MARCHAN stated, "Dude, you want to go ...come. Come downstairs [to the middle level of **the 1920 North Karlov Residence**] so we can talk. Not over the phone [ACEVEDO- MARCHAN did not want to discuss narcotics with Individual N over the telephone]." Individual N remarked, "Alright, then."

C. Probable Cause To Search 4910 West Medill, Chicago, Illinois

388. Records obtained during the course of the investigation and related surveillance indicate that 4910 West Medill, Chicago, Illinois (hereinafter "**the 4910 West Medill Residence**") is the primary residence of Arturo FLORES and his girlfriend/wife, Individual O, as summarized below:

a. On May 8, 2011, during an intercepted call (call #563) on Target Phone 13, FLORES identified his address as 4910 West Medill Avenue while speaking to an unknown female.

b. A search of the Lexis/Nexis computer database revealed that a female, Individual O resides at **the 4910 West Medill Residence**. The Commonwealth Edison account at **the 4910 West Medill Residence** is registered to Individual O.

c. On numerous occasions FLORES has been observed by surveillance officers

driving a black Nissan Pathfinder bearing Illinois license A478484. This vehicle is registered to Individual O, and officers have observed this vehicle, occupied by FLORES and the individual believed to be Individual O, exit the garage behind **the 4910 West Medill Residence** as recently as April 14, 2011.

d. Surveillance has observed FLORES, as well Individual O, enter and/or exit **the 4910 West Medill Residence** on several occasions, as recently as June 3, 2011.

e. Information obtained from GPS pings of Target Phone 7, used by FLORES, between January 29, 2011 and February 25, 2011, indicate that this phone was located in the area of **the 4910 West Medill Residence** during most evenings. Furthermore, between April 26, 2011, and May 20, 2011, GPS pings of Target Phones 12 & 13, each used by FLORES, indicate that this phone was located in the area of **the 4910 West Medill Residence** during most evenings.

389. During this investigation, DEA has learned that the FLORES DTO has used **the 4910 West Medill Residence** to conduct the drug trafficking activities of the FLORES DTO. For example:

a. On February 9, 2011, FLORES obtained three kilograms of heroin from a Mexican source of supply, which was delivered by GARCIA to FLORES at a local hotel. *See ¶¶ 206-218.* Information obtained from GPS pings of Target Phone 7, used by FLORES at that time, indicates that FLORES returned directly to **the 4910 West Medill Residence** following the transaction.

b. On February 12, 2011, FLORES met with SOBERANIS-CAMPOS and gave him \$144,500 as payment for the three kilograms of heroin delivered to FLORES on February 9,

2011. Prior to meeting with SOBERANIS-CAMPOS, FLORES and an unidentified female ("UF") exited **the 4910 West Medill Residence** with the money to pay for the heroin in an off-white bag. After FLORES met with SOBERANIS-CAMPOS, law enforcement conducted an investigative stop on SOBERANIS-CAMPOS, during which law enforcement recovered the off-white bag, which contained \$144,500 in drug proceeds. *See* ¶¶ 219-230.

390. **The 4910 West Medill Residence** is a single-family residence located at 4910 West Medill Avenue, Chicago, Illinois. The premises is a two-story residence with a basement level. The residence has off-white aluminum siding and a dark-colored wood staircase leading up to the front door. The numbers "4910" are displayed in grey/black letters directly to the west of the front door. The front door of the premises consists of an aluminum door with windows. The front of the premises has three front windows on the first level, one window on the top level, and one window on the basement level. The premises also contains a detached two-car garage directly north of the residence.

D. Probable Cause To Search 2615 East 73rd Street, Chicago, Illinois

391. Records obtained during the course of the investigation and related surveillance indicate that 2615 East 73rd Street, Chicago, Illinois (hereinafter "**the 2615 East 73rd Street Residence**") is BLOUNT's primary residence, as summarized below:

a. The utilities at **the 2615 East 73rd Street Residence** are registered in the name of Individual P. Likewise, the Lexis/Nexis computer database also indicates that Individual O resides at this address. Intercepted phone calls of BLOUNT indicate that Individual P is BLOUNT's girlfriend.

b. Surveillance has observed BLOUNT enter and/or exit this residence on several occasions, including as recently as June 10, 2011, at approximately 12:15 p.m., when surveillance observed BLOUNT exit **the 2615 East 73rd Street Residence**. Furthermore, on several occasions surveillance has observed vehicles known to be driven by BLOUNT and vehicles registered to Individual P parked at **the 2615 East 73rd Street Residence**.

c. Information obtained from GPS pings of Target Phone 1 and Target Phone 3, each used by BLOUNT, from July 14, 2010 to November 25, 2010, routinely placed BLOUNT's phones in the vicinity of **the 2615 East 73rd Street Residence** during evenings. Furthermore, on June 4, 2011, GPS Pings of Subject Phone 19, used by BLOUNT, indicate that, between approximately 4:39 a.m. and 10:39 a.m., this phone was located in the area of the 2615 East 73rd Street Residence. Likewise, GPS Pings of Subject Phone 19 revealed that the phone was in the vicinity of **the 2615 East 73rd Street Residence** from the evening of June 9, 2011, until June 10, 2011, at 12:40 p.m., shortly after surveillance observed BLOUNT exiting the residence, as described above.

392. Based on intercepted calls, the DEA has learned that BLOUNT and Individual P have used **the 2615 East 73rd Street Residence** to store large amounts of cash obtained through BLOUNT's drug activities. Based on the investigation, including surveillance of BLOUNT and monitoring intercepted calls involving BLOUNT, BLOUNT does not appear to have a legitimate source of income, and his narcotics activities are the only known source of large amounts of cash. For example:

a. On October 25, 2010, at approximately 10:15 p.m., BLOUNT, using Target Phone 3, placed an outgoing call (call #29647) to Individual P. During this call, BLOUNT told

Individual P, “Hey, bring some money outside. I forgot I ain’t got no money to pay [Individual Q].” Individual P asked, “Like how, like what?” BLOUNT replied, “Just swap it [money] out. Bring a G [\$1,000, form inside **the 2615 East 73rd Street Residence**] and put that one back [inside **the 2615 East 73rd Street Residence**]. Remember I gave you them hundreds, right?” Individual P replied, “Yeah, I didn’t count [the money] though.” BLOUNT continued, “Put that G [\$1,000] in there [**the 2615 East 73rd Street Residence**] and get a different G [\$1,000, in smaller bills].” Individual P stated, “Alright.”

b. On October 28, 2010, at approximately 11:42 a.m., BLOUNT, using Target Phone 3, placed an outgoing call (call #31162) to Individual P. During this call, Individual P asked, “You need me to do something?” BLOUNT replied, “I was finna tell you . . . that money you just counted . . . go down there . . . hide it in the basement [of **the 2615 East 73rd Street Residence**] somewhere.” Individual P asked, “So you don’t want it [the money] up?” BLOUNT responded, “Well, you can put it [the money] up higher if you can. In that little room [inside **the 2615 East 73rd Street Residence**].” Individual P asked, “In yours [BLOUNT’s room] or another one?” BLOUNT replied, “No, you know where I be going up [the room where BLOUNT has previously secreted money]. Just put it [the money] up. Put it [the money] up good though [hide the money well].” Individual P then asked, “You want all of it [the money] up?” BLOUNT replied, “Yeah, put up what you just counted.”

c. On November 1, 2010, at approximately 7:44 p.m., BLOUNT, using Target Phone 3, placed an outgoing call (call #33898) to Individual P, who stated that she was at home the 2615 East 73rd Street Residence]. During this call, BLOUNT stated, “Hey, won’t you, um, do me a favor? I need you to grab like, um . . . three bucks [\$3,000] for me [from inside **the 2615 East**

73rd Street Residence]. Cause I left the other money down there. But just grab it [the \$3,000] out of yours [Individual P's cache of money in the residence], and I'll give it to you [repay the money] once we [BLOUNT and an associate] get to the house. I'm gonna call you to meet me so I can go . . . handle my . . . you know what I'm saying [BLOUNT indicates that he needs the money to conduct a drug transaction]?" Individual P replied, "Alright."

d. On November 1, 2010, at approximately 9:24 p.m., BLOUNT received an incoming call (call #33917) from Individual P. During this call, Individual P stated, "You know it's only three [\$3,000] in here. I'm talking 'bout in our room [at the 2615 East 73rd Street Residence]. There's only three \$3,000] left." BLOUNT asked, "What about at your bottom [the bottom of an unknown container at **the 2615 East 73rd Street Residence**], did you use that [money]?" Individual P replied, "That's one [\$1,000]. I didn't use none, and then I . . . took this since the bill money, and I put that [money] up. It [the total amount of money in the container] is nothing but three total [\$3,000]. I done searched all this stuff." BLOUNT responded, "I'm talking 'bout at the very bottom [of the container], baby. How many [how much money] is in there?" Individual P stated, "One, two, three, four five. But now it's only two [\$2,000] now." BLOUNT stated, "I'm talking 'bout the money you have. Remember, I had gave you four [\$4,000]. After I came back, remember? When I came up from out of there, out of town. That's twenty [\$20,000], okay? That was twenty [\$20,000]. This was the next day. That same day, rather, I had gave you four [\$4,000]." Individual P responded, "Yeah, I'll bring you this four [\$4,000] . . . it's gonna be three [\$3,000] left." BLOUNT replied, "Nah, bring me the three [\$3,000]. You need to put those up [secure the remaining \$4,000 inside **the 2615 East 73rd Street Residence**]."

e. On November 16, 2010, at approximately 7:18 p.m., BLOUNT placed an outgoing call (call #43659) to Individual P. During this call, BLOUNT asked, “Where you at, baby?” Individual P replied, “I’m in the house [**the 2615 East 73rd Street Residence**].” BLOUNT stated, “I need you to do me a favor. You heard me?” Individual P replied, “Number eight [\$8,000].” BLOUNT stated, “That . . . that was it. But, what I did with you earlier [BLOUNT refers to a previous money transaction he conducted with Individual P]. You know what I’m saying?” Individual P asks, “So you need that [an unknown amount of currency] plus another one? Plus another eight [\$8,000]?” BLOUNT stated, “No, just the number eight [\$8,000]. Like what you just did [the previous money transaction between Individual P and BLOUNT]. And then what I left you [an unknown amount of money], take eight [\$8,000] out of that. I just need the eight. Put yours [Individual P’s money] back up [inside **the 2615 East 73rd Street Residence**] and give me the eight. So call me when you get ready to leave out the house [**the 2615 East 73rd Street Residence**]. I’ll tell you where to meet me at.” Individual P replied, “Alright.”

393. **No-Knock Entry and Arrest:** There is good cause to excuse the requirement that officers knock-and-announce before executing the search warrant at **the 2615 East 73rd Street Residence** and the arrest warrant of BLOUNT. I make this request based on credible evidence that the BLOUNT has threatened physical violence against others and has access to weapons, as summarized below:

a. As described below, BLOUNT threatened to use physical force on GRISBY after GRISBY ceased responding to BLOUNT about Indiana law enforcement’s seizure of BLOUNT’s black GMC Denali, containing 428 grams of heroin on July 24, 2010, which was intended for GRISBY. *See* ¶¶ 61-79, above. In particular, on August 4, 2010, at approximately 7:22

p.m., BLOUNT, using Target Phone 1, received an incoming call from Individual P. During this conversation, Individual P asked BLOUNT, “you haven’t heard from them [about the black GMC Denali]?” and BLOUNT responded, “Naw, but I talked to Ray [Rashawn Crawford].³⁸” Later in the call, Individual P asked, “You say you called his cousin?” and BLOUNT responded “Yeah I said I talked to Ray. . . you know that nigga Myron [GRISBY]? That’s Ray’s cousin.” Individual P then stated, “Awe ok. Yeah I told you what you got to do Boo. . . you got to do you a surprise that’s all. Go in a car that they don’t expect to see you. You know, they see the truck . . . go in a car that they don’t think you will be in.” BLOUNT responded, “Naw, I’m awake up in the morning I’m a put on some tint on the Grand Prix. . . I’m a ride that mother fucker down there on ‘em. . . I told Greasy³⁹, man get my 30’s together, I’m a shoot the shit out of me a mother fucker . . . remember I took, I took three pistols down there.” Individual P asked, “You did?” and BLOUNT continued, “Hell yeah, so days like this I’m a shoot the shit out of a (U/I) you know Greasy my main man. I’ll leave [Individual R] one, cause to make sure they don’t let a mother fucker, you know what I’m saying?” On August 5, 2010, law enforcement observed BLOUNT having the windows of his vehicle “tinted” at Frank’s Auto Shop, located at 5918 South Ashland Avenue, in Chicago, Illinois.

b. As summarized below, BLOUNT has discussed with Crawford the fact that BLOUNT provided Crawford with weapons after law enforcement officers in Cincinnati seized a gun from Crawford on September 15, 2010.

³⁸ On August 4, 2010, at approximately 12:11 p.m., BLOUNT, using Target Phone 1, made an outgoing telephone call to Rashawn Crawford (“Crawford”), in which BLOUNT expressed anger about not receiving return calls from GRISBY. Crawford is charged with narcotics violations in a separate federal criminal complaint filed the same day as this complaint.

³⁹ Greasy refers to LaGuada Thomas, who is charged with narcotics violations in a separate federal criminal complaint filed at the same time as this complaint. LaGuada Thomas also has weapons charges pending against him in Hamilton County, Ohio.

i. On September 29, 2010, at approximately 9:18 p.m., BLOUNT, using Target Phone 3, received an incoming call (Call #13173) from Crawford. During this call, Crawford asked, “Whatever happen to that four-nickel [gun]? You had to put it to use [shoot someone]?” BLOUNT replied, “Awe, shit, shit, I got a call that old man, I, when I was out in Bolingbrook, police got on me, and I left it [gun] over there.” Crawford stated, “And you don’t know nobody else that’s trying to sale nothing, one of them [guns] off, do you?” BLOUNT stated, “I’m waiting on them [guns] to come in now.” Crawford responded, “Man, just let me know or whatever, how much [money] that little [U/I]. I need, I need, probably like two [two guns] of them, man.” BLOUNT remarked, “Alright.”

ii. On October 19, 2010, at approximately 11:27 p.m., BLOUNT, using Target Phone 3, received an incoming call (Call #25905) from Crawford. During this call, Crawford asked, “What’s up with it? Hey, mother fucker ain’t never get back to you about that, uh, about the strap [gun], about the strizzap [gun]?” BLOUNT advised, “Man, I told you, soon as they get it dirty, you ain’t got to worry about it. You got one [gun] coming.” Crawford stated, “Alright, well shit, just let me know. That’s all I wanted. I’m just making sure.” BLOUNT advised, “No, I ain’t forgot boy, you still got one of them [gun] coming.”

c. BLOUNT told HOPKINS to tell Individual I that if Individual I did not pay the drug debt he owed to BLOUNT, “Man, tell him I’m gonna shoot his ass.” *See* ¶ 89, above.

d. Therefore, based upon all of the information set forth herein, my training and experience, and the training and experience of other law enforcement officers, I believe that having agents and officers knock and announce their presence prior to executing the search warrant at **the 2615 East 73rd Street Residence** and the **arrest warrant of BLOUNT** would endanger law

enforcement officers executing the warrant in light of BLOUNT's access to firearms and willingness to carry out acts of violence in relating to his narcotics trafficking. Based on this evidence, there is reasonable suspicion that knocking and announcing law enforcement's presence, under the particular circumstances, would be dangerous or futile, or that it would inhibit the effective investigation of the crime by, for example, allowing the destruction of evidence.

394. **The 2615 East 73rd Street Residence** is a single-family home located at 2615 East 73rd Street, Chicago, Illinois. The premises is a one-story residence with red and brown brick covering the entire residence. The premises has a concrete staircase leading up to the front door of the residence. The numbers "2615" are affixed to the center of the front door and are gold in color. The front door of the premises consists of brown wood. The front of the premises also has eight sectional front windows located on the main level of the residence.

E. Items Requested To Be Seized

395. Based on the foregoing it appears that there is probable cause to seize from the foregoing locations the following items:

- a. Controlled substances;
- b. Paraphernalia for packaging, processing, diluting, weighing, and distributing controlled substances, such as scales, funnels, sifters, grinders, glass panes and mirrors, razor blades, plastic bags, heat-sealing devices, and dilutants; and paraphernalia for packaging cash drug proceeds including heat sealing devices, plastic packaging for cash, rubber bands, and money-counting devices;
- c. Personal books and papers reflecting names, addresses, telephone numbers, and other contact or identification data relating to distribution of controlled substances, which may

be maintained in either paper form or on computers, computer disks, CD-ROM disks, DVD disks, electronic storage or other related equipment;

d. Books, records, receipts, notes, ledgers, airline tickets, money orders, wire transfer or money remittance records, and other records related to the receipt, expenditure and concealment or other disposition of income, which may be maintained in either paper form or on computers, computer disks, CD-ROM disks, DVD disks, electronic storage or other related equipment, relating to the distribution of controlled substances;

e. Cash, currency, financial instruments, and records relating to controlled substances income and expenditures of proceeds of drug transactions, and evidence of financial transactions relating to obtaining, transferring, secreting, or spending of large sums of money made from engaging, in drug trafficking activities;

f. Pagers, cellular phones, electronic organizers, caller identification, answering machine tapes, and other communication devices and the contents thereof, including names, addresses, telephone numbers and other contact or identification information of participants in drug trafficking activities;

g. Any and all electronic devices which are capable of analyzing, creating, displaying, converting or transmitting electronic or magnetic computer impulses or data. These devices include computers, personal digital assistants (PDAs), computer components, external hard drives, and other computer related electronic devices;

h. Photographs of individuals, associates, their property and their drugs;

i. Records reflecting names, nicknames, addresses, and telephone numbers of both current and past drug associates;

j. Safes, safety-deposit boxes, keys for safety-deposit boxes, hidden compartments and other secure locations, which often contain the proceeds of narcotics-trafficking activity, including large amounts of United States currency, financial instruments, precious metals, jewelry, and other items of value, as well as books and records regarding the acquisition, use, and disposition of such items of value;

k. Canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents and keys; and,

l. Documents related to rental, lease, or ownership of the search sites identified herein.

VII. PROBABLE CAUSE FOR SEIZURE WARRANTS FOR VEHICLES

396. This Affidavit also is made for the limited purpose of establishing probable cause in support of seizure warrants to seize the following vehicles as property used to facilitate the violations alleged herein, namely, Title 21, United States Code, Section 841, and/or Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2, and property used or intended to be used in any manner or part to commit or facilitate the commission of said violations:

a. 2006 red Dodge Charger – Vehicle Identification Number (“VIN”) 2B3KA53H26323783 (referred in this Affidavit as the **Dodge Charger**). See ¶¶ 27, 28, 37, 38, and n. 4.

b. 2007 white Chevy Impala – VIN 2G1WC58RX79102996 (referred to in the Affidavits⁴⁰ as the **Chevy Impala**). See n. 17, above; ¶ 39 of Affidavit II; and ¶ 21 and n. 5 of Affidavit III.

c. 2007 gold Cadillac Escalade – VIN 1GYFK63837R164786 (referred to in this Affidavit as the **Cadillac Escalade**). See ¶¶ 34, 44, 53, 56, and 58.

d. 2005 black Nissan Pathfinder – VIN 5N1AR18W65C745698 (referred to in this Affidavit as the **Black Nissan Pathfinder**). See ¶¶ 59 and 226.

e. 2011 maroon Nissan Maxima – VIN 1N4AA5AP8BC819517 (referred to in this Affidavit as the **Nissan Maxima**). See n. 36 and ¶365.

f. 2006 silver Nissan Pathfinder – VIN 5N1AR18W96C616761 (referred to in this Affidavit as the **Silver Nissan Pathfinder**). See ¶¶ 290 and 365.

g. 2001 white Toyota Tacoma – VIN 5TESN92N61Z845704 (referred to in this Affidavit as **Toyota Tacoma**). See ¶ 290 and n. 36.

These vehicles will hereinafter be referred to collectively as “SUBJECT VEHICLES.”

397. As set forth in this Affidavit, there is probable cause to believe that upon conviction of defendants, SUBJECT VEHICLES will be subject to forfeiture.

398. Based on my experience, I know that motor vehicles, like SUBJECT VEHICLES, are easily altered in appearance, transferred or hidden, and also that a vehicle can be concealed in a garage or storage area, making it difficult, if not impossible, to locate for purposes of forfeiture

⁴⁰ On the same day as the filing of this complaint and affidavit, two separate complaints and affidavits have been filed charging additional individuals with related narcotics charges. One complaint and affidavit charges Fernando Acevedo-Fitz, Louis Gambino, Edna Feliciano, FNU LNU (a/k/a Grenas), Gonzalo Rodriguez, and Javon Johnson (hereinafter, “Affidavit II”). The other complaint and affidavit charges Jerry Spann, Jarvin Graham, Laguada Thomas, George Reese Thomas, Reginald Brandon Savage, and Rashawn Crawford with related narcotics offenses (hereinafter, “Affidavit III”).

proceedings. Additionally, motor vehicles can be transported outside the district, further increasing the potential unavailability of these motor vehicles for forfeiture in the event of conviction.

399. Finally, I know from my experience that unless a motor vehicle is seized, it can be difficult to preserve the value of the motor vehicle for forfeiture purposes, because financial obligations relating to the vehicle, including insurance payments and loan obligations, are not satisfied when an owner is given prior notice that his property will likely be subject to forfeiture. In order to ensure that SUBJECT VEHICLES are available for forfeiture, Title 21, United States Code, Section 853(3) authorizes the entry of a restraining order or any other action necessary to preserve the property, and Title 21, United States Code, Section 853(f) states that, in the same manner as provided for a search warrant, a seizure warrant may be issued when the property would, in the event of conviction, be subject to forfeiture and a restraining order may not be sufficient to assure the availability of the property for forfeiture.

400. Additionally, courts have long recognized the unique circumstances involved in searching and seizing vehicles due to their inherent mobility, and the United States Supreme Court has found that the warrantless seizures of motor vehicles do not violate the Fourth Amendment of the United States Constitution where there is probable cause to believe that the automobile is subject to forfeiture, because movable contraband may be spirited away.

401. Based on the above, this Affidavit hereby seeks seizure warrants for SUBJECT VEHICLES under Title 18, United States Code, Section 853(f), because a restraining order or any other action is not sufficient to assure the availability of SUBJECT VEHICLES for forfeiture.

VIII. BASIS FOR NO-KNOCK ARREST WARRANT

402. As set forth in ¶393 above, there are grounds to excuse the requirement that officers knock-and-announce before executing the **arrest warrant of BLOUNT**.

403. There are grounds to excuse the requirement that officers knock-and-announce before executing the **arrest warrant of FERNANDEZ**. As set forth in n. 35 above, on May 15, 2009, CPD arrested FERNANDEZ for narcotics violations. As the officers attempted to take FERNANDEZ into custody, FERNANDEZ kicked and punched the officers. Shortly thereafter, CPD executed a search warrant at FERNANDEZ's then-residence at 4636 South Keating in Chicago, and seized an additional 2,862 grams of heroin, a .38 semiautomatic fully loaded with six rounds of ammunition, two .357 magnums, each loaded with six rounds of ammunition, a .32 caliber revolver loaded with six rounds of ammunition, and nineteen rounds of .38 caliber ammunition and six rounds of .357 ammunition. Charges arising out of this arrest and execution of the search warrant are pending against FERNANDEZ in the Circuit Court of Cook County. Based on this evidence, I respectfully submit there is reasonable suspicion that knocking and announcing the presence of law enforcement before executing the **arrest warrant of FERNANDEZ** would endanger law enforcement officers executing the warrant and pose the danger of the destruction of evidence.

FURTHER AFFIANT SAYETH NOT.

Timothy L. Lessner
Special Agent, DEA

SUBSCRIBED AND SWORN TO BEFORE ME
THIS ____ DAY OF JUNE, 2011.

The Honorable _____
United States Magistrate Judge