

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JERRY SPANN, a/k/a Buddah,
JARVIN GRAHAM(a/k/a Jarvon),
GEORGE REESE THOMAS (a/k/a Reese)
LAGUADA THOMAS (a/k/a Laguarda Thomas,
Laguana Thomas, Laquarda Thomas, Greasy)
REGINALD BRANDON SAVAGE (a/ka Brandon) and
RASHAWN CRAWFORD (a/k/a Ray)

CRIMINAL COMPLAINT III
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: On or about September 10, 2010, JERRY SPANN (a/k/a Buddha) did knowingly and intentionally possess with intent to distribute a controlled substance, namely, one 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 Two: On or about September 20, 2010, JERRY SPANN (a/k/a Buddha) 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).

Count Three: On or about October 4, 2010, JARVIN GRAHAM (a/k/a Jarvon) 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).

Count Four: Beginning no later than on or about November 21, 2010, and continuing until at least November 25, 2010, GEORGE REESE THOMAS (a/k/a Reese) and LAGUADA THOMAS (a/k/a Laguarda Thomas, Laguana Thomas, Laquarda Thomas, Greasy) 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 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), in violation of Title 21, United States Code, Section 846.

Count Five: On or about November 21, 2010, REGINALD BRANDON SAVAGE (a/ka Brandon) 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).

Count Six: On or about September 22, 2010, RASHAWN CRAWFORD (a/k/a Ray) did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity 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).

conversations; (f) physical surveillance conducted by law enforcement agents and officers, which I have either participated in or have 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 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 violations of the following offenses:

(a) On or about September 10, 2010, JERRY SPANN (a/k/a Buddha) did knowingly and intentionally possess with intent to distribute a controlled substance, namely, one 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);

(b) On or about September 20, 2010, JERRY SPANN (a/k/a Buddha) 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);

(c) On or about October 4, 2010, JARVIN GRAHAM (a/k/a Jarvon) 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);

(d) Beginning no later than on or about November 21, 2010, and continuing until on or about November 25, 2010, GEORGE REESE THOMAS (a/k/a Reese) and LAGUADA THOMAS (a/k/a Laguarda Thomas, Laguana Thomas, Laquarda Thomas, Greasy) conspired with each other, and with others known and unknown, to 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), all in violation of Title 21, United States Code, Section 846;

(e) On or about November 21, 2010, REGINALD BRANDON SAVAGE (a/ka Brandon) 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); and

(f) On or about September 22, 2010, RASHAWN CRAWFORD (a/k/a Ray) did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity 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 seize the vehicles described in ¶103 below, and in Attachment A for each requested seizure warrant (“SUBJECT VEHICLES”).

5. 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

6. 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 Blount and Bridges, and others, are involved in the distribution of multi-kilogram quantities of heroin in Chicago, Illinois; Cincinnati, Ohio; New York, New York; and elsewhere.¹

7. 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:²

¹The following individuals referred to in this complaint are charged in separate federal criminal complaints, filed the same date as this complaint: Domingo Blount, Gabriel Bridges, Fernando Acevedo-Fitz, Luis Gambino and Fernando Acevedo-Marchan.

²The 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

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
(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

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.

8. Through this investigation, including intercepted calls and surveillance, law enforcement has uncovered evidence of specific narcotics transactions involving customers of the Blount-Bridges DTO, who are named as defendants in this complaint.

9. This Affidavit is organized as follows: (a) Section III sets forth a brief description of each defendant 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 charged; (d) Section VI describes probable cause for seizing the SUBJECT VEHICLES.

III. OVERVIEW OF THE NARCOTICS TRANSACTIONS

10. The investigation has determined that since at least 2010, 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 Domingo Blount (hereinafter, "Blount") and Gabriel Bridges (hereinafter, "Bridges"), both of whom conduct narcotics transactions on behalf of the DTO, including delivering narcotics to customers and obtaining payment for narcotics from customers.

11. The Blount-Bridges DTO distributes narcotics to wholesale customers, including the following individuals:

a. Jerry SPANN (hereinafter, "SPANN") is a customer of the Blount-Bridges DTO, purchasing narcotics to distribute in the Chicago, Illinois area.

b. Jarvin GRAHAM (hereinafter, "GRAHAM") is a customer of the Blount-Bridges DTO, purchasing narcotics to distribute in the Chicago, Illinois area.

c. George Reese THOMAS (hereinafter, "GEORGE THOMAS") is a customer of the Blount-Bridges DTO, purchasing narcotics to distribute in the Cincinnati, Ohio area.

d. Laguada THOMAS (hereinafter, "LAGUADA THOMAS") is a customer of the Blount-Bridges DTO, purchasing narcotics to distribute in the Cincinnati, Ohio area.

e. Brandon Reginald SAVAGE (hereinafter, "SAVAGE") is a customer of the Blount-Bridges DTO, purchasing narcotics to distribute in the Cincinnati, Ohio area.

f. Rashawn CRAWFORD (hereinafter, "CRAWFORD") is a customer of the Blount-Bridges DTO, purchasing narcotics to distribute in the Cincinnati, Ohio area.

IV. SUMMARY INDEX OF THE EVIDENCE AGAINST EACH DEFENDANT

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

Defendant	Paragraphs
RASHAWN CRAWFORD	88-102
JARVIN GRAHAM	52-64
REGINALD BRANDON SAVAGE	80-87
JERRY SPANN	17-51
GEORGE REESE THOMAS	65-79
LAGUADA THOMAS	65-79

13. 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				
Date	Quantity	From	To	Paragraph Nos.
9/10/10	1 kilo	Blount-Bridges	Spann	¶¶14-34
9/20/10	150 grams	Blount-Bridges	Spann	¶¶35-51
9/23/2010	25 grams	Blount-Bridges	Crawford	¶88-93
10/4/2010	320 grams	Blount-Bridges	Graham	¶¶52-55
10/9/2010	60 grams	Blount-Bridges	Crawford	¶94-102
10/24/2010	300 grams	Blount-Bridges	Graham	¶¶56-64
11/21/2010	300 grams	Blount-Bridges	Savage	¶80-87
11/25/2010	280 grams	Blount-Bridges	LaGuada Thomas & George Thomas	¶65-79

V. THE EVIDENCE

A. JERRY SPANN

1. *SPANN Purchases a Kilogram of Heroin from the Blount-Bridges DTO on September 10, 2010*

14. Based on the calls and surveillance described below, as well as my knowledge of the investigation overall, I believe that, on September 10, 2010, Blount and Bridges purchased a kilogram of heroin from Fernando Acevedo-Fitz (“Acevedo-Fitz”), in a deal brokered by Luis Gambino (hereinafter “Gambino”). Blount met with SPANN immediately prior to purchasing the heroin from Acevedo-Fitz and Gambino, for the purpose of obtaining the purchase money from SPANN, and then, immediately after, delivered the kilogram of heroin to SPANN. However, the

purchase money for the kilogram of heroin was short \$2,800, leading to Blount meeting with SPANN again to obtain the remaining \$2,800, which Blount then gave to Gambino in a meeting in Washington Park in Chicago.

15. On September 9, 2010, at approximately 4:18 p.m., Blount, who was using Target Phone 3, called Gambino (Call #3325). During this call, Blount stated, "Man, Joe, uh, I want three of those [three kilograms of heroin] . . . three all the way." Gambino stated, "Okay . . . let me give you a call back like in 30 minutes, yeah, cause I'm kind of in the middle of something right now." Blount responded, "Man, call the man [Acevedo-Fitz] though, cause these people [heroin customers] around me, man. They [source of supply] gonna take five dollars off [lower the price of the heroin], right? Call me right back."

16. On September 9, 2010, at approximately 4:29 p.m., Gambino, using Target Phone 2, placed an outgoing call (Call #3327) to Acevedo-Fitz. During this call, Gambino stated, "The black guy [Blount] already called me. He is ready. Are you ready [to conduct a heroin transaction]?" Acevedo-Fitz replied, "Yeah. I'm waiting for you." Gambino responded, "Okay. The 300 [300 grams of heroin] that were missing yesterday [from a previous heroin transaction on September 8, 2010], okay?" Acevedo-Fitz remarked, "Yes." Gambino stated, "Okay. Have them [300 grams of heroin] ready. I'll go over there right now."

17. On September 9, 2010, at approximately 4:30 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #3328) to Gambino, who was using Target Phone 2. During this call, Gambino asked, "Hey, Charlie, are you ready?" Blount stated, "Let me call my cousin right now. I'm a grab that money [to purchase the heroin]." Gambino replied, "Alright . . . call your cousin and have everything [money] ready. Okay?" Blount asked, "Is he [Acevedo-Fitz] gonna be ready for

the whole three [three kilograms of heroin] or what did he say? One at a time [one kilogram of heroin for three different transactions] or what?" Gambino responded, "No, for the three, the ones that we missed yesterday [300 grams of heroin]." Blount advised, "I'm talking about the three whole ones [three kilograms of heroin]. No, man, no, like the whole thing [kilograms of heroin], all the way." Gambino asked, "The whole thing [kilograms of heroin]?" Blount stated, "Yeah. What he [Acevedo-Fitz] want me to do? One at a time [one kilogram of heroin in three different transactions]? If he [Acevedo-Fitz] want me to do one at a time, I'll come, put the money for one [one kilogram of heroin], then I'll come back with the money for the next one [money for an additional kilogram of heroin], you know what I'm saying?" Gambino replied, "Yeah. You know what? Why don't you send your nephew [Bridges] over here to my house, then." Blount responded, "Man, I'm fittin' to come to your house, man. I'm right here on 63rd and uh . . ." Gambino stated, "Come to my house. Hurry up."

18. On September 9, 2010, at approximately 4:50 p.m., Gambino, using Target Phone 2, placed an outgoing call (Call #3331) to Acevedo-Fitz. During this call, Gambino stated, "The guy [Blount] is here with me right now and he says he wants three whole ones [three kilograms of heroin]." Acevedo-Fitz asked, "Who?" Gambino stated, "The black guy [Blount] from yesterday." Acevedo-Fitz asked, "Three whole ones [three kilograms of heroin]?" Gambino confirmed, "Yes." Acevedo-Fitz asked, "For when?" Gambino replied, "Right now, he's [Blount] going to let me know . . . he's going to let me know, but he wants three whole ones [three kilograms of heroin]. Okay?" Acevedo-Fitz asked, "But he's coming right now for the others [300 grams of heroin], right?" Gambino stated, "Hold on a bit. Don't hang up. He's [Blount] making a call." In the background of Gambino's phone, Blount is heard stating, "You ready, man? Cause I'm with him [Gambino] now."

We just got done talking to the old man [Acevedo-Fitz].” Later in the call intercepted on Target Phone 2, Acevedo-Fitz told Gambino, "Right now, I only have the 300 [grams of heroin]." Gambino asked, "You think you can grab a whole one [one kilogram of heroin] right now?" after which the call was disconnected.

19. On September 9, 2010, at approximately 4:57 p.m., Gambino, using Target Phone 2, placed an outgoing call (Call #3332) to Acevedo-Fitz. During this call, Gambino stated, "One whole one [one kilogram of heroin] for today." Acevedo-Fitz advised, "There is only one [kilogram of heroin] for today." Gambino replied, "Just one [kilogram of heroin] for today, and tomorrow another one [additional kilogram of heroin], and then tomorrow, another one [a third kilogram of heroin]." Acevedo-Fitz stated, "Alright, then. Tell him [Blount] to come."

20. On September 9, 2010, at approximately 6:11 p.m., Blount, who was using Target Phone 3, placed an outgoing call (Call #3339) to Gambino, who was using Target Phone 2. During this call, Blount stated, "This mother fucker [the customer, SPANN] got me sitting here, Amigo. I'm waiting on him [for the purchase money] . . . you know me, I get irritated." In a subsequent telephone call intercepted over Target Phone 2 (Call #3348), Blount and Gambino agreed that they would complete the heroin transaction the next day. Gambino then spoke with Acevedo-Fitz and told him that Blount would be ready the next day (Call #3349, #3355, #3362, #3367).

21. On September 10, 2010, beginning at approximately 3:42 p.m., surveillance observed the following: (a) Blount, driving a white Chevrolet Impala, exited the detached garage at Acevedo-Fitz's residence at 2049 N. Kostner; (b) at approximately 3:47 p.m., Blount arrived at Kentucky Fried Chicken, located at 4715 West Fullerton Avenue, Chicago, Illinois; (c) moments later, a green Dodge Caravan, driven by Gambino, exited the Kentucky Fried Chicken parking lot; (d) a black

Chrysler 300 (hereinafter “**Black Chrysler**”) parked next to Blount's white Chevrolet Impala (hereinafter “**Chevrolet Impala**”) in the Kentucky Fried Chicken parking lot; (e) at approximately 3:49 p.m., the **Chevrolet Impala** and the **Black Chrysler** 300 departed the Kentucky Fried Chicken parking lot in tandem. Law enforcement officers subsequently observed SPANN³ as the driver of the **Black Chrysler**. Based on my knowledge of the investigation, the intercepted calls (including those set forth in the following paragraphs) and the surveillance, I believe that Blount, driving the **Chevrolet Impala**, had picked up the kilogram of heroin at Acevedo-Fitz’s residence, and then delivered the heroin to his customer, SPANN, in the parking lot of the Kentucky Fried Chicken.

22. On September 10, 2010, at approximately 5:34 p.m., approximately two hours after the meetings summarized in the preceding paragraph, Gambino, using Target Phone 2, received an incoming call (Call #3378) from Acevedo-Fitz. During this call, Gambino asked, "What happened?" Acevedo-Fitz told Gambino, "There was some [money] missing man. My guy [supplier] just came to see me and . . . I went to help him count over there . . . the blocks [stacks of money] . . .and there

³The identification of SPANN and his voice in this Affidavit is based in part on the following: On September 10, 2010, law enforcement officers observed the **Black Chrysler** 300 and the driver, and later identified the driver as SPANN from an Illinois driver’s license photograph of SPANN. Later on the day of this meeting, a telephone call was intercepted on Target Phone 3 from telephone number (773) 699-0725, in which Blount discussed with the user of (773) 699-0725 that the user of (773) 699-0725 had been short on money for a narcotics deal and needed to bring the rest of the money to Blount. On September 20, 2010, the user of (773) 699-0725 arranged, through telephone calls intercepted on Target Phone 3, to pick up 150 grams of heroin, as described below; shortly thereafter, surveillance observed SPANN meet with Blount. Monitors compared the voice in the telephone calls from (773) 699-0725 on September 10 with the voice in the telephone calls from (773) 699-0725 on September 20, the two dates on which surveillance observed SPANN meet with Blount, and determined that all calls were with the same person. In addition, during an intercepted call (Call #763) over Target Phone 3, Blount left a voicemail on telephone number (773) 699-0725 and referred to the user of that phone as “Buddha.” A law enforcement database inquiry revealed that “Buddha” is a nickname for SPANN. Based on the above information, SPANN was identified as the user of telephone number (773) 699-0725. Law enforcement officers also identified Jerry SPANN as the user of telephone number (773) 567-6344 through voice comparisons conducted with intercepted calls involving SPANN’s use of telephone number (773) 699-0725. In the summaries of the intercepted calls in this Affidavit in which SPANN is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to SPANN in each of these summaries is the same.

were some [money] missing." Gambino asked, "How many [money] were missing?" Acevedo-Fitz explained, "In all the boxes it [money] came in . . . they were all missing two [\$200], missing five [\$500], and there were some with eight [\$800] . . . it didn't even come with the 1,000 [\$1,000] . . . there was 2,500 [\$2,500] missing." Gambino responded, "We'll settle things [get the \$2500 that was missing] with the black guy [Blount] tomorrow. I'll call the black guy [Blount] right now and I'll call you right back." Acevedo-Fitz replied, "Yeah, because I even put what was mine [Acevedo-Fitz's profit from the sale of heroin] in there . . . with the guy [heroin source of supply] . . . it's fucking worth shit. I got screwed." Gambino responded, "I'm a call the black guy [Blount] right now and I'll call you right back."

23. On September 10, 2010, at approximately 6:09 p.m., Gambino, using Target Phone 2, received an incoming call (Call #3380) from Acevedo-Fitz. Acevedo-Fitz told Gambino, "How is he [Blount] going to ask us for more [heroin] when he is trying to pull a fast one [not pay the full amount] on us? We have been straight [honest] with him." Gambino replied, "So it's 2800 [\$2800 short] right?" Acevedo-Fitz acknowledged and Gambino told Acevedo-Fitz he would call him back.

24. On September 10, 2010, at approximately 6:20 p.m., Gambino, using Target Phone 2, placed an outgoing call (Call #3382) to Blount, who was using Target Phone 3 (Call #34). During this call, Gambino stated, "Listen to what I'm going to tell you man. You guys were short 28 [\$2,800], man." Blount asked, "28 [\$2,800]?" Gambino remarked, "Yeah, man." Blount stated, "I'm going to call you right back." Gambino advised, "The old man [Acevedo-Fitz] is upset at me, man."

25. One minute later, Blount, using Target Phone 3, placed an outgoing call (Call #36) to SPANN. During this call, Blount stated, "Man, you need to ride by me. Old man [Gambino] just

called me back man." SPANN asked, "What he talking about?" Blount stated, "Man, he [GAMBINO] said them [money] like 28 [\$2,800] short." SPANN asked, "You, boy, you playing, ain't ya?" Blount stated, "Man, I swear to god, what the fuck you mean?" Later in the call, SPANN stated, "Tell them I'll do it again, man." Blount asked, "Huh?" SPANN stated, "I'm driving around, I'll do it again." Blount advised, "Man, Amigo called me man. I said quit crying man, I'm fittin' to call them, man, that's what I told you man, that old man [Acevedo-Fitz] don't be fucking around." SPANN responded, "Alright, I'm fitting to bump into you. [SPANN is going to meet with Blount]."

26. On September 10, 2010, at approximately 6:55 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #55) to SPANN. During this call, Blount stated, "Man, what's up man, cause he [Gambino] calling me." SPANN replied, "Listen, listen, could you call him [the supplier] and tell him, man, be there first thing in the morning, gotta go to the crib right quick and grab the bread [money] though man, but I was in the process of doing something, that's all." Blount responded, "Man, this shit making me look bad man [Blount advised that, because SPANN was short on the money for the heroin, Blount is losing the trust of Acevedo-Fitz and Gambino]." SPANN stated, "I ain't going to make you look like that. I'll tell you first thing in the morning. I'll be right at you." Later in the call, Blount stated, "Man, I'll take out of my own pocket, man. I'm not going to lose my connect [Acevedo-Fitz and Gambino] for you all, man." SPANN stated, "No, I'm saying, no, I got it." Blount advised, "We got to make this shit right because he going to cry to me, not you. He don't know you all." SPANN responded, "I understand that man. I said I got the bread [money] though, man. I was just so far in the process of doing some shit."

27. On September 10, 2010, at approximately 6:57 p.m., Gambino, using Target Phone 2, received an incoming call (Call #3388) from Blount, who was using Target Phone 3. During this

call, Blount stated, "Hey man, he's [SPANN] fittin' to grab that [money] man. Did he [Acevedo-Fitz] count it, if it's [money] short, right? You said 28 [\$2,800]?" Gambino replied, "Yeah, 28 [\$2,800] it was short, man." Blount subsequently advised, "I told him [SPANN], 'you make the old man [Acevedo-Fitz] mad at me, man, I don't want to fuck up my connect cause of you. Man, you need to bring me that mother fucking money.'" Gambino stated, "Yeah man, my old man [Acevedo-Fitz], old man called me right now, man. He like, 'man, what kind of trust do we have right there,' you know what I'm saying?" Blount stated, "Man, listen. You know . . . when I grabbed the money from him [SPANN], I didn't get a chance to count it, you know what I'm saying?" Blount further stated, "Tell him [Acevedo-Fitz] I'm on it, tell him I'm on it. I'm just waiting on him [SPANN] to call me. He fittin' to meet me, you know what I'm saying. . . Just tell that old man [Acevedo-Fitz] he [SPANN] got that [money], calm down."

28. On September 11, 2010, at approximately 3:03 p.m., Gambino, using Target Phone 2, received an incoming call (Call #3466) from Acevedo-Fitz. During this call, Acevedo-Fitz asked, "What did he [Blount] tell you?" Gambino replied, "I'm going to talk to him right now. I'll call you back and let you know." Acevedo-Fitz asked, "I thought he wanted another piece [more heroin]?" Gambino responded, "He is going to want that piece [heroin]. So, how much [money] was he [Blount] missing?" Acevedo-Fitz advised, "I already told you, \$2,800." Gambino stated, "Let me call this guy and I'll call you right back."

29. On September 11, 2010, at approximately 8:11 p.m., Gambino, using Target Phone 2, received an incoming call (Call #3514) from Acevedo-Fitz. During this call, Acevedo-Fitz asked, "He [Blount] hasn't answered you?" Gambino replied, "No, the fucking black guy [Blount] doesn't answer." Acevedo-Fitz stated, "When he [Blount] calls, you tell him there isn't anything, that I just

have a half [500 grams of heroin] that I'm saving for him. If he wants it [heroin]. If not, I'll take it [heroin] somewhere else [to another customer]." Gambino advised, "Okay, you do what you have to do." Acevedo-Fitz replied, "I'll wait until tomorrow, otherwise, I'll give it [heroin] to another guy."

30. On September 11, 2010, at approximately 10:11 p.m., Blount, using Target Phone 2, received an incoming call (Call #856) from Gambino, who was using Target Phone 3. During this call, Blount stated, "I got it [money], you know what I'm saying? I'm gonna take it out of my shit [Blount's profit for brokering the heroin transaction with SPANN] cause this nigga [SPANN] ain't, he ain't never show up, but I'm gonna pay for it though, you know what I'm saying? I got him. We ain't even gonna worry about that [missing \$2,800]."

31. On September 11, 2010, at approximately 11:05 p.m., Blount, using Target Phone 3, received an incoming call (Call #886) from SPANN. During this call, Blount and SPANN agreed to meet at a gas station at 83rd and the Dan Ryan. Based on my knowledge of the investigation and the intercepted calls, I believe that, shortly thereafter, SPANN paid Blount the remaining \$2,800 for the kilogram of heroin.

32. On September 12, 2010, at approximately 12:49 p.m., GAMBINO, using Target Phone 2, received an incoming call (Call #3572) from Blount, who was using Target Phone 3. During this call, Blount asked, "You know how to come to Washington Park?" Gambino asked, "Where's it at?" Blount replied, "It's like by 55th and King Drive." Gambino stated, "I'll be over there right now. I'm headed that way right now."

33. A few minutes later, Gambino, using Target Phone 2, placed an outgoing call (Call #3574) to Acevedo-Fitz. During this call, Gambino stated, "I spoke to him [Blount] already. I'm

going to go talk to him at his house right now, okay?" Acevedo-Fitz replied, "Okay. Tell him that I only have the 'micha' [meaning half and is a reference to 500 grams of heroin] left." Gambino responded, "Okay. I'm going to go talk to the black guy [Blount] right now, okay? I'm going to go talk to him at his house, because I didn't like what he did [shorting the money]."

34. On September 12, 2010, beginning at approximately 1:36 p.m., surveillance observed the following: (a) Gambino's green Dodge Caravan parked next to Blount's purple and yellow Chevrolet Tahoe at Washington Park, located in the area of 55th Street and King Drive, Chicago, Illinois; (b) Gambino exited the green Dodge Caravan and met with Blount; (c) Blount gave money to Gambino, which Gambino counted, before both departed the area. Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that at this time, Blount gave Gambino the remaining \$2,800 owed for the kilogram of heroin, which Blount had obtained from SPANN as payment for the kilogram of heroin.

2. *SPANN Purchases 150 Grams of Heroin from the Blount-Bridges DTO on September 20, 2010*

35. Based on the calls described below, as well as my knowledge of the investigation overall, I believe that, on September 20, 2010, the Blount-Bridges DTO purchased a kilogram of heroin from Acevedo-Fitz, in a deal brokered by Gambino, and then sold 150 grams of the heroin to SPANN. Blount negotiated the deal, and Bridges picked up the heroin from Gambino and Acevedo-Fitz at Acevedo-Fitz's residence, after which Blount met SPANN at a residence on the south side, where Blount gave SPANN 150 grams of the heroin.

36. On September 16, 2010, at approximately 10:25 a.m, Gambino, using Target Phone 2, received an incoming call (Call #3912) from Blount, who was using Target Phone 3. Blount

asked Gambino why Gambino had not called him back. Gambino replied, "The old man [Acevedo-Fitz] was busy. We're gonna do it [the narcotic transaction] today, though. So, he [Acevedo-Fitz] said he's gonna be ready [to conduct the narcotics transaction] by today. You [Blount] want the half [½ kilogram of heroin], right?" Blount responded, "I'm getting stuff [money] together, it's gonna be a whole one [1 kilogram of heroin]." Gambino told Blount that he would call him back.

37. On September 20, 2010, at approximately 9:02 a.m., Gambino, using Target Phone 2, made an outgoing call (Call #4328) to Blount, who was using Target Phone 3. Gambino told Blount, "We're [Gambino and Acevedo-Fitz] ready [to complete the narcotics transaction]. Are you ready [to complete the transaction]?" Blount responded, "Alright, let me get over here and get the money [for the narcotics transaction] and shit." Blount said that he would be there in "thirty minutes."

38. On September 20, 2010, at approximately 9:36 a.m., Gambino, using Target Phone 2, made an outgoing call (Call #4332) to Acevedo-Fitz. Gambino asked Acevedo-Fitz if he was ready and Acevedo-Fitz responded, "Yes, did that guy [Blount] get here already?" Gambino responded, "He's [Blount] on his way. Should I wait outside or come in?" Acevedo-Fitz instructed Gambino to come to his house, walk through the alley and enter through the garage.

39. On September 20, 2010, at approximately 10:15 a.m., surveillance observed Gambino, driving a green Dodge Caravan, arrive at the 2049 North Kostner Residence, the residence of Acevedo-Fitz. At approximately 11:07 a.m., while monitoring a pole camera in the vicinity of Acevedo-Fitz's residence, agents observed Gambino enter the residence through a rear gate accessible from the alley.

40. On September 20, 2010, at approximately 12:31 p.m., Gambino, using Target Phone 2, received an incoming call (Call #4355) from Blount, who was using Target Phone 3. Blount told Gambino that Blount would be ready to complete the narcotics transaction at 4:00 p.m. A minute later, Gambino, using Target Phone 2, made an outgoing call (Call #4356) to Acevedo-Fitz, and informed Acevedo-Fitz that he had received a call from Blount, and that Blount would be ready to complete the narcotics transaction at 4:00 p.m.

41. On September 20, 2010, at approximately 3:43 p.m., Blount, using Target Phone 3, received an incoming call (Call #6596) from SPANN. During this call, SPANN asked "What you doing . . . When you coming back this way [to the South Side of Chicago to sell the heroin]?" Blount responded, "I'm waitin' on Amigo [Gambino] to call me then I'll be up. [Blount was waiting for Gambino to get the heroin, and then Blount would be back to the south side with heroin for SPANN]. Later in the call, SPANN stated that he was "waiting on you [Blount], man, you talking about 3 o'clock [Blount had promised that he would have heroin for SPANN at 3:00 p.m., and SPANN was still waiting]." Blount responded, "No, I had to wait for someone to get off work at three. . . So Amigo [Gambino] said he gonna U/I . . . I ain't trying to be over there sittin' like we, man fuck that [Blount did not want to be waiting for the heroin at Acevedo-Fitz's residence]." SPANN replied, ". . . Alright, okay, I'm around."

42. On September 20, 2010, at approximately 5:08 p.m., Gambino, using Target Phone 2, made an outgoing call (Call #4356) to Acevedo-Fitz. Gambino told Acevedo-Fitz, "I'm here already, but, I'm waiting for this fucker [Blount]." Acevedo-Fitz asked Gambino if he was coming into the residence and Gambino stated, "If you want. If not, I could wait out here. Yeah, it would be better if I come inside."

43. On September 20, 2010, at approximately 5:12 p.m., Gambino, using Target Phone 2, made an outgoing call (Call #4394) to Blount, who was using Target Phone 3. Blount told Gambino that he was still waiting for his customers.

44. On September 20, 2010, at approximately 5:37 p.m., Blount, using Target Phone 3, received an incoming call (Call #6685) from SPANN. During this call, Blount stated, "Man, I am going to meet him now, Joe, I am going to hit you when I get back."

45. On September 20, 2010, at approximately 5:45 p.m., Gambino, using Target Phone 2, received an incoming call (Call #4396) from Blount, who was using Target Phone 3. Blount told Gambino, "Tell him [Acevedo-Fitz], could he get a whole one [one kilogram of heroin] and extra hundred?" Gambino responded, "Oh, I don't know about that. I got to ask him [Acevedo-Fitz]." Blount stated, "You said you're right there [with Acevedo-Fitz]. Ask him [Acevedo-Fitz] so I know to send this money [for the extra 100 grams of heroin] or not." The call went silent for a few moments and then Gambino stated, "Hey, he [Acevedo-Fitz] said you could only take the one [the kilogram of heroin], the whole one, [the kilogram of heroin] for today because he's been waiting [to complete the transaction] on you. Okay?" Blount responded, "All right. Here he [Bridges] comes. He's [Bridges] on his way. I'm going to send my uncle [Bridges]."

46. At approximately 6:32 p.m., surveillance monitoring the pole camera at the 2049 North Kostner Residence observed the Cadillac Escalade pull into the garage of the residence, and, then, at approximately 6:49 p.m., observed the Cadillac Escalade exit the garage of the residence. Surveillance initiated on the Cadillac Escalade observed Bridges as the driver. Based on my knowledge of the investigation, the intercepted calls and surveillance, I believe that at this time, Bridges picked up the kilogram of heroin from Acevedo-Fitz and Gambino.

47. On September 20, 2010, surveillance observed Blount arrive at 7950 S. Carpenter, Chicago, Illinois (hereinafter “7950 S. Carpenter Street”) at approximately 7:36 p.m., and, approximately four minutes later, Bridges arrived at 7950 S. Carpenter Street.

48. On September 20, 2010, at approximately 7:49 p.m., less than ten minutes after Bridges brought the heroin to Blount at 7950 S. Carpenter Street, as described in the preceding paragraph, Blount, using Target Phone 3, received an incoming call (Call #6781) from SPANN. Blount asked SPANN, “What's up, you ready [to complete the narcotics transaction]? What you trying to do [how much heroin is SPANN going to purchase]?” SPANN responded, “shit, 150 [150 grams of heroin].” Blount replied, “Okay, you know that's 12 [\$12,000], you got it [the money] right? 12 [\$12,000].”⁴ SPANN replied, “yeah, yeah, yeah.” Blount stated, “Okay, man, I'm just making sure [SPANN has the money] man.” SPANN told Blount that he would meet with Blount shortly.

49. On September 20, 2010, beginning at approximately 8:48 p.m., surveillance observed Blount exit 7950 S. Carpenter Street and stand outside. A short time later, a burgundy Land Rover parked in the vicinity of 7950 S. Carpenter Street, and SPANN exited the front passenger seat of the Land Rover. SPANN walked to the front porch of 7950 S. Carpenter Street, where SPANN and Blount engaged in conversation. SPANN and Blount then entered 7950 S. Carpenter Street. Based on my knowledge of the investigation, the intercepted calls and the surveillance, I believe that, at this time, Blount delivered to SPANN 150 grams of heroin, and SPANN gave Blount \$12,000 in purchase money for the heroin.

⁴Based upon my training and experience, and my knowledge of this investigation, I believe that the price quoted by Blount is consistent with the price for 150 grams of heroin.

50. At approximately 8:57 p.m., surveillance observed SPANN exit 7950 S. Carpenter Street and enter the front passenger seat of the burgundy Land Rover. The Land Rover then left the area. Surveillance followed but was terminated when the vehicle began conducting counter-surveillance measures, such as driving at a high rate of speed and executing sharp turns.

51. On September 20, 2010, at approximately 8:05 p.m., Gambino, using Target Phone 2, received an incoming call (Call #4432) from Blount, who was using Target Phone 3. Blount told Gambino, "This [the heroin] was 15 [grams] off [short]." Gambino asked, "15 [grams] off [short]?" Blount responded, "Yes, 15 [grams]. I'm saying, he'd [Acevedo-Fitz] be crying about his little money. Shit, he [Acevedo-Fitz] be giving me ten [grams] and fifteen [grams] short every rip [narcotics transaction]." Gambino replied, "Okay, I'm going to talk [about the 15 grams shortage] to him [Acevedo-Fitz] tomorrow because right now he's busy. I'll call him tomorrow first thing in the morning. I'll be on your shit [check into the shortage] right now. I'll talk to him [Acevedo-Fitz] tomorrow morning. Don't worry. I got you."

B. JARVIN GRAHAM

1. GRAHAM Purchases 320 Grams of Heroin from the Blount-Bridges DTO on October 4, 2010

52. Based on the intercepted calls described below, as well as my knowledge of the investigation overall, I believe that on October 4, 2010, GRAHAM requested and paid for 340 grams of heroin from Blount. After the delivery, GRAHAM claimed that Blount had provided only 320 grams of heroin, and Blount agreed to give him an additional 20 grams of heroin.

53. On October 4, 2010, at approximately 8:38 p.m., Blount, using Target Phone 3, received an incoming call (Call #16416) from GRAHAM.⁵ During this call, Blount asked, “Are you ready [to complete the heroin transaction]?” GRAHAM responded, “Yeah, where are you going to bump into [meet] me at?” Later in the conversation, Blount suggested a good place to meet, stating, “How about at 67th [Street] where it [Lakeshore Drive] end at?” GRAHAM responded, “That’s were you gonna meet me at?” Blount responded, “Yeah, that gas station right there.” GRAHAM agreed.

54. At approximately 11:15 p.m., Blount, using Target Phone 3, received an incoming call (Call # 16493) from GRAHAM. GRAHAM told Blount, “That [heroin] wasn’t 40 [340 grams].” Blount indicated that he did not understand, and GRAHAM repeated, “It [heroin] wasn’t 40 [340 grams].” Blount asked, “What [weight] you say they [heroin] was?” GRAHAM responded, “It was 20 [320 grams]. You said 340 [grams], it [heroin] was 320 [grams].” Blount told GRAHAM

⁵The identification of GRAHAM and his voice in this Affidavit has been identified based in part on the following: During an intercepted call (Call #39999) over Target Phone 3 on November 10, 2010 at 7:04 p.m., the user of telephone number (312) 532-5729 identified himself as, “This Jarvin.” During an intercepted call (Call #6851) over Target Phone 3 on September 20, 2010 at 10:22 p.m., Blount referred to the user of telephone number (312) 532-5729 as “Jarvin.” On November 2, 2010, pursuant to intercepted calls over Target Phone 3 with telephone number (312) 532-5729, law enforcement officers conducted surveillance in the area of **the 7922 South Carpenter Street Residence**. Law enforcement officers observed a black GMC Yukon, bearing temporary Illinois license plate 195M934, park in the area of 7922 South Carpenter Street. Law enforcement officers then observed a black male exit the black GMC Yukon, meet with Blount, and a short time later, re-enter the black GMC Yukon and depart the area. Surveillance followed the vehicle to a restaurant located on 95th Street in Chicago, Illinois, where the same black male exited the black GMC Yukon and entered the restaurant. A law enforcement officer then followed the black male inside the restaurant and, after viewing a known Illinois driver’s license photograph of GRAHAM, positively identified the black male as GRAHAM. Law enforcement also identified GRAHAM as the black male who had met with Blount on September 20, 2010, when he exited a white Chevrolet Impala and leaned inside the front passenger door of Blount’s vehicle. The Chevrolet Impala is registered to Jarvin GRAHAM, 6538 South Green Street, Chicago, Illinois. GRAHAM’s Illinois driver’s license also is issued to this address, and this is the same address listed in several previous arrests of GRAHAM. Based on the above information, Jarvin GRAHAM was identified as the user of telephone number (312) 532-5729. In the summaries of the intercepted calls in this Affidavit in which GRAHAM is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to GRAHAM in each of these summaries is the same.

he would call him back. Three minutes later, Blount, using Target Phone 3, placed an outgoing call (Call #16494) to GRAHAM. Blount asked GRAHAM, “Your clock [scale] reading [weighing] right?” GRAHAM responded, “Yeah, that motherfucker [scale] reading right, shit.” Blount stated, “Okay then. I’m a give you 20 [grams of heroin].” GRAHAM responded, “Alright, that’s cool, that’s cool.”

55. Based upon my knowledge of the investigation and the intercepted calls, I believe that Blount had provided GRAHAM with 340 grams of heroin on October 4, 2010.⁶

2. GRAHAM Purchases 300 Grams of Heroin from the Blount-Bridges DTO on October 24, 2010

56. Based on the intercepted calls described below, as well as my knowledge of the investigation overall, I believe that on October 24, 2010, Blount agreed to provide 350 grams of heroin to GRAHAM, as described in ¶¶XX-XX, below. However, after the delivery by Bridges, GRAHAM notified Blount that he had received only 300 grams of heroin.

57. On October 24, 2010, at approximately 5:35 p.m., Blount, using Target Phone 3, received an incoming call (Call #28771) from GRAHAM. GRAHAM asked Blount to meet with him, and Blount told GRAHAM he was on his way.

58. On October 24, 2010, at approximately 11:09 p.m., Blount, using Target Phone 3, made an outgoing call (Call #28950) to GRAHAM. GRAHAM told Blount, “That [heroin] wasn’t what [weight] you said it [heroin] was.” Blount responded, “350 [grams of heroin].” GRAHAM stated, “No, the hell it [heroin] ain’t [doesn’t weigh 350 grams].” Blount asked GRAHAM, “What

⁶Just two days earlier, during an intercepted call over Target Phone 3 on October 2, 2010, at approximately 12:24 p.m. (Call #14855), Blount had told GRAHAM, “My mans roll down I’m gonna give him something . . . but I wanted you to look at this cause you like the light-looking stuff, right [a reference to the type of heroin GRAHAM preferred]? GRAHAM responded, “yeah, yeah . . .”

you mean ‘no the hell it [heroin] ain’t?’” GRAHAM responded, “Shit, that’s [heroin] 3 [300 grams].” Blount stated, “Naw, naw man. You sure?” GRAHAM responded, “Hell yeah.” Blount told GRAHAM he would call him back.

59. At approximately 11:33 p.m., Domingo Blount, using Target Phone 3, made an outgoing call (Call #28961) to GRAHAM. During this call, Blount asked GRAHAM the heroin weight, and GRAHAM responded, “Yeah, 3 [300 grams of heroin].” In the background, Blount is heard speaking with Bridges, and Bridges stated to Blount, “I only took out [heroin] what you told me. Took the 5 [unknown quantity of heroin] out . . .” Blount told Bridges, “Listen, if I give you 400 [grams of heroin] . . .” Bridges then stated to Blount, “I don’t know, I ain’t did nothing with it, I ain’t touched it [heroin]. The only time I touched it [heroin] is when you came over there [unknown location] today and got that [heroin] and when you just told me to do that, I ain’t did nothing else with it [heroin].” Blount then asked GRAHAM, “Is your clock [scale] reading right?” GRAHAM responded, “You know I don’t bullshit like that man.”

60. Three minutes later, Blount, using Target Phone 3, made an outgoing call (Call #28962) to GRAHAM. Blount asked if the heroin weighed 300 grams and GRAHAM replied, “Man, flat dog. It’s [heroin] 3 [300 grams] flat, no bullshit. You know I ain’t bullshitin’ [lying]. I don’t bullshit [lie] like that man, I’m sitting right here in front of it [heroin] right now.” Blount is then heard speaking in the background (likely again to Bridges), “I had 5 [500 grams of heroin] left. I gave you [Bridges] a 100 [grams of heroin]. Somebody [unknown buyer] for a 25 [25 grams of heroin]. Then . . . said give me [Blount] that 20 [grams of heroin] I brought you right? I know it should be 355 [grams of heroin] left.” Later in the call, Domingo Blount continued in the background to Bridges, “I know what I’m . . . do though. Just give me everything [money] you

[Bridges] owe me, I don't need your help [selling narcotics] no more. Ain't nobody touching it [heroin] but you [Bridges]." GRAHAM later stated, "Just like the last time I told you, it [heroin] . . . was off 2 [20 grams] last time [October 4, 2010 transaction between Blount and GRAHAM]."

61. On October 25, 2010, at approximately 8:11 p.m., Blount, using Target Phone 3, had a conversation with GRAHAM (Call #29542), during which Blount asked, "What's that [amount of money] that you just gave me [for the heroin delivered on October 24, 2010]?" GRAHAM answered "25 [\$2,500]." Blount later stated that he would check and call GRAHAM right back.

62. Approximately five minutes later, at approximately 8:16 p.m., Blount, using Target Phone 3, had a conversation with GRAHAM (Call #29547) in which Blount stated to GRAHAM that it was "23 [the money that GRAHAM had paid Blount for the heroin on October 24, 2010 was only \$2,300]" GRAHAM responded, "Naw, it was, it's it's one [stack of money] in there that got all, all dollars in there it should have two in there, two [another \$2,000]." Blount then repeated this to someone in the background. GRAHAM explained again, "It's the only one that ain't got a rubber band on there its all dollars. You right it's, it's 2, it's 2, 3 [\$2,300]. Then it's it's one that got all, all dollars in it, it's it's it's 2 [another \$2,000]." Later in the call, Blount stated that "It's 20 ones then U/I dollars made 23." Later in the call, GRAHAM stated, "I'm finna tell you exactly how it is. It's 3 of them that's 5 all together it's 3 fives wrapped up. . . it should be 3 fives wrapped up all together right? Naw matter fact it's 4 fives wrapped up all together." Blount stated, "I'm a just recounting it myself man." Approximately 20 minutes later, at approximately 8:34 p.m., Blount, using Target Phone 3, had a conversation with GRAHAM (Call #29563) in which Blount stated to GRAHAM, "this ain't coming out to nothing but 23 [\$2,300]." GRAHAM subsequently asked

where Blount was and said that he would “bump into you [meet with Blount to give him the remaining money for the heroin].”

63. The next day, on October 26, 2010 at approximately 2:58 p.m. Blount, using Target Phone 3, had a conversation with GRAHAM (Call #30047), in which GRAHAM stated, “When I put that bag in that car man . . . it was what I said it was man. It was exactly what I said it was. . . it was 23 [\$2,300] in the bag and I’m the one who put the two, the two dollars [\$2,000] in there that was, that was together . . . I don’t know if your man did it man, but somebody went in that bag man.” Blount responded, “Alright. Alright fool. I’ll holler at you.”

64. Based upon my knowledge of the investigation and the intercepted calls, as well as my training and experience with the prices of heroin, I believe that Blount provided GRAHAM with 300 grams of heroin on October 24, 2010.

C. GEORGE REESE THOMAS and LAGUADA THOMAS

1. GEORGE REESE THOMAS and LAGUADA THOMAS Conspire to Purchase 280 Grams or More of Heroin from Blount on November 25, 2010

65. As described in the intercepted telephone calls below, beginning on November 16, 2010, LAGUADA THOMAS and GEORGE THOMAS conspired to purchase at least 200 grams of heroin from Blount in Chicago. Blount told them that he is getting them 280 grams of heroin, and LAGUADA THOMAS and GEORGE THOMAS came to Chicago and gave Blount partial payment for the 280 grams of heroin on November 22, 2010; however, Blount was unable to obtain the heroin at that time, so he returned the money. Blount then obtained the heroin, and LAGUADA THOMAS and GEORGE THOMAS returned to Chicago and picked up the heroin a few days later on November 25, 2010, giving Blount partial payment for the heroin. After LAGUADA THOMAS and

GEORGE THOMAS returned to Cincinnati, GEORGE THOMAS agreed to give Blount the remaining money owed for the heroin the following Monday.

66. On November 16, 2010, at approximately 5:01 p.m., Blount, using Target Phone 3, placed a call (Call #43640) to GEORGE THOMAS.⁷ During this call, Blount stated, “I was calling you, man, so nigga might have like . . . you know what I’m saying? You said, but 50 [grams of heroin], take 50 dollars extra [50 grams of heroin], you know?” GEORGE THOMAS stated, “Oh, Okay.” Blount continued, “But I know you said bring an extra hundred [100 grams of heroin], but I know it’s gonna be like 250 [grams of heroin].” GEORGE THOMAS replied, “Right, right. But I’m saying, like, you know I’m coming up [to Chicago], right?” Blount asked, “Was y’all like, ready, or you was saying wait ‘til around then?” GEORGE THOMAS responded, “Oh, wait ‘til,

⁷The identification of GEORGE THOMAS and his voice in this Affidavit is based in part on the following: During an intercepted call (Call #28900) over Target Phone 3 on October 24, 2010 at 9:50 p.m., the user of telephone number (305) 747-2269 referred to himself as “Reese,” which is GEORGE THOMAS’s middle name. During this same call, Blount told the user of (305) 747-2269 that he would be coming down “there” tomorrow.” The next day, pursuant to GPS “pings” and intercepted calls over Target Phone 3, law enforcement officers in Cincinnati, Ohio, established surveillance at a Holiday Inn Express, located at 130 West Mitchell Avenue, Cincinnati, Ohio. On October 26, 2010, at approximately 1:17 p.m., law enforcement officers observed a sage Ford Explorer enter the Holiday Inn parking lot. Moments later, surveillance observed a black male, who was the sole occupant, exit the Ford Explorer and enter the hotel. At approximately 1:20 p.m., a call (Call #29981) was intercepted over Target Phone 3, where the user of telephone number (305) 747-2269 stated, “I’m right here.” Blount then asked, “You at the door [hotel door]?” The user of (305) 747-2269 remarked, “Yeah.” At approximately 1:35 p.m., surveillance observed the same black male exit the Holiday Inn and re-enter the sage Ford Explorer. Law enforcement officers then conducted mobile surveillance on the sage Ford Explorer for approximately 15 minutes. At this time, a Cincinnati Police Department officer conducted a traffic stop on the sage Ford Explorer for an excessive window tint violation. After the officer approached the vehicle, the driver and sole occupant of the Ford Explorer provided identification to the officer under the name George Reese THOMAS. In addition, on November 6, 2010, law enforcement officers in Chicago observed GEORGE THOMAS and LAGUADA THOMAS in a gold Chevrolet Malibu, with a license plate registered to a car rental company; documents from the car rental company, reflect that the car was rented in the name of George THOMAS, with the contact telephone (305) 747-2269, the same number as that intercepted on Target Phone 3. Based on the above information, George Reese THOMAS was identified as the user of telephone number (305) 747-2269. In the summaries of the intercepted calls in this Affidavit in which GEORGE THOMAS is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to GEORGE THOMAS in each of these summaries is the same.

like, then. The motherfucker [narcotics associate] ready, but I ain't ready to move [conduct a heroin transaction], like, until this weekend though." Blount responded, "Okay, that's what I'm asking." GEORGE THOMAS then stated, "You see what I'm saying? I'm just waiting on my little nigga [narcotics associate]." Blount replied, "Alright."

67. On November 19, 2010, at approximately 11:35 a.m., Blount, using Target Phone 3, had a conversation (Call #45313) with LAGUADA THOMAS.⁸ During this call, LAGUADA THOMAS stated, "I'm . . . we gonna need about two [200 grams of heroin]." Blount replied, "Alright, so, uh, y'all want me to give y'all some pictures [samples] of the cars [heroin], right?" LAGUADA THOMAS replied, "Yeah, two of 'em [200 grams of heroin]. I don't know what my brother [GEORGE THOMAS] will do. I need two [200 grams of heroin] though." Blount replied, "Alright, call him [GEORGE THOMAS] and ask him."

⁸The identification of LAGUADA THOMAS and his voice in this Affidavit is based in part on the following: During intercepted calls over Target Phone 1 and Target Phone 3, Blount has referred to the user of telephone number (404) 424-6735 as "Greasy." During an intercepted call (Call #20701) over Target Phone 1, another individual asked Blount, "That ain't the one with those gold teeth in his mouth, is it?" Blount replied, "No, that's Greasy you talking about." A law enforcement database inquiry has revealed that Laguada THOMAS has gold teeth in the front of his mouth, and that Laguada THOMAS has the name "Greasy" tattooed on his right hand. Also, during another intercepted call (Call #21315) over Target Phone 3, the user of telephone number (404) 424-6735 stated, ". . . tow truck ran out of gas, cause I had a blow out on the Avalon [Toyota Avalon]." A commercial database inquiry of Laguada THOMAS revealed that he has a 2005 Toyota Avalon registered to him at 1744 Dalewood Place, Cincinnati, Ohio, bearing Illinois license plate EUB8376. This vehicle had been observed during surveillance of Blount and others in Chicago, Illinois, on November 9, 2010, and February 18, 2011, respectively. During another intercepted call (Call #22813) over Target Phone 3, the user of telephone number (404) 424-6735 discussed a traffic stop that occurred in Rockcastle, Kentucky, on July 23, 2010, and also discussed discrepancies with his car payments. On October 25, 2010, based on the above call, law enforcement officers in Kentucky located a citation issued by the Kentucky State Police, Vehicle Enforcement Unit, to Laguada THOMAS on July 23, 2010, for speeding and failure to produce an insurance card. The citation was issued to Laguada THOMAS and the address listed was 1744 Dalewood Place, Cincinnati, Ohio. Based on the above information, Laguada THOMAS was identified as the user of telephone number (404) 424-6735. Law enforcement officers also identified Laguada THOMAS as the user of telephone number (404) 380-3466 through voice comparisons with intercepted calls involving telephone number (404) 424-6735. In the summaries of the intercepted calls in this Affidavit in which LAGUADA THOMAS is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to LAGUADA THOMAS in each of these summaries is the same.

68. On November 21, 2010, at approximately 3:11 p.m., Blount, using Target Phone 3, received an incoming call (Call #47035) from GEORGE THOMAS. During this call, GEORGE THOMAS stated, "I'm probably getting on the road [to travel to Chicago] in about the next . . . U/I . . . hours. Everything straight [did Blount have the heroin]?" Blount replied, "Yeah, I'm just waiting on motherfucker [source of supply] to call me back. That way I can get another hundred [100 grams of heroin] for 'Gree' [LAGUADA THOMAS]. You know what I'm saying?" GEORGE THOMAS replied, "Yeah."

69. On November 21, 2010, at approximately 5:42 p.m., Blount, using Target Phone 3, placed a call (Call #47143) to LAGUADA THOMAS. During this call, Blount stated, "Dude [source of supply] had that dark [dark-colored heroin]. But I just run into that other man [another source of supply], he showed me something different now. That's why I said, I know you might still want that other color [light-colored heroin] than that dark color [heroin]." LAGUADA THOMAS asked, "So what, it [the heroin] was some dark shit?" Blount replied, "It was some dark [heroin]. I just got this other, um, thing [heroin sample] from the other man [source of supply] who was getting that light from. He [source of supply] just called me and gave me something [a sample of heroin], so I'm gonna check into that, see what I'm saying?" LAGUADA THOMAS asked, "Is that [heroin] dark?" Blount replied, "This shit [heroin] look like it's gray."

70. On November 21, 2010, at approximately 5:44 p.m., Blount, using Target Phone 3, placed a call (Call #47144) to GEORGE THOMAS. During this call, GEORGE THOMAS stated, "He [LAGUADA THOMAS] talking 'bout he tired and all this old shit, so we gonna take off [leave Chicago and return to Cincinnati] tomorrow morning." Blount replied, "Yeah, I just called him [LAGUADA THOMAS] back. I just talked to him. That will give me enough time to check this

other shit [another variety of heroin] anyway. You see what I'm saying?" George THOMAS then asked, "What I owe you, 200 [how much money do I owe you, for 200 grams of heroin]?" Blount stated, "Nah, it's 280 [the amount of money owed is for 280 grams of heroin]. What the fuck you mean?" GEORGE THOMAS stated, "Oh, it ain't 200, it's 280?" Blount replied, "Yeah, it's 180 [grams of heroin] plus the hundred [grams of heroin] [BLOUNT supplied GEORGE THOMAS and LAGUADA THOMAS with 280 grams of heroin]." GEORGE THOMAS stated, "Oh, okay. Alright."

71. On November 22, 2010, at approximately 6:51 p.m., Blount, using Target Phone 3, received a call (Call #47880) from LAGUADA THOMAS. During this call, Blount stated, "That punk-ass . . . Amigo [GAMBINO], man. Talking 'bout some shit with the traffic. Yeah, he [GAMBINO] waiting on me. I'm sitting in here sleepy, man. Where you at?" LAGUADA THOMAS replied, "Up here at the BP [gas station]." Blount asked, "Who, you and bro [GEORGE THOMAS]." LAGUADA THOMAS replied, "Yeah, me and bro. So what, he [Gambino] on some bullshit? I thought you already had that on deck [LAGUADA THOMAS thought that Blount had already acquired the heroin from Gambino]." Blount responded, "I have [acquired the heroin]. Remember I told you the nigga [source of supply] had something better? The motherfucker [source of supply] he [Gambino] was getting that light [heroin] from? I had got that dark [heroin]. But I'm going by the Amigo's [Gambino's] crib where Gabe [Gabriel Bridges] is at. I had to just grab my minivan [to transport the heroin]." LAGUADA THOMAS asked, "Where you want me to go? You want me to go over to the . . . U/I?" Blount replied, "I said just kill a little time, I won't be that long. About 20 minutes, 30." LAGUADA THOMAS replied, "Alright."

72. On November 22, 2010, at approximately 6:15 p.m., Blount, using Target Phone 3, received an incoming call (Call #47854) from GEORGE THOMAS. During this call, GEORGE THOMAS stated, "We at, what's this, 71 [71st street, Chicago]." Blount replied, "Alright, I'm sitting over here with 'Migo' [source of supply] and them, so just give me a minute, alright? Go find something to do for an hour, alright?" George THOMAS stated, "Alright."

73. On November 22, 2010, at approximately 11:39 p.m., Blount, using Target Phone 3, placed a call (Call #48025) to LAGUADA THOMAS. During this call, LAGUADA THOMAS stated, "I'm . . . we . . . in [unit number] 208." Blount replied, "I'm downstairs." LAGUADA THOMAS asked, "Oh we gotta come down [to conduct the heroin transaction]? You want me to come down?" Blount replied, "Yeah, we right here." LAGUADA THOMAS stated, "Alright." Based upon subsequent calls, I believe that Blount picked up the purchase money for the heroin.

74. On November 23, 2010, at approximately 11:13 a.m., Blount, using Target Phone 3, received an incoming call (Call #48337) from GEORGE THOMAS. During this call, GEORGE THOMAS stated, "We just now getting up. We gotta get the fuck up outta here [leave Chicago]." Blount replied, "Alright, I'm on my way over to Amigo [Fernandez Acevedo-Marchan (hereinafter "Acevedo-Marchan")] house [to acquire heroin]." GEORGE THOMAS stated, "Okay then. We about to get up and go get us something to eat somewhere, man. And then after we get finished getting something to eat, then I'm gonna call you again." Blount asked, "Get who something to eat?" GEORGE THOMAS stated, "Me and Guardy [LAGUADA THOMAS]. We going to get something to eat, me and 'Gree' [LAGUADA THOMAS]. After we get something to eat, we gonna give you a call." Blount replied, "Alright."

75. On November 23, 2010, at approximately 10:07 p.m., Blount, using Target Phone 3, received an incoming call (Call #48727) from GEORGE THOMAS. During this call, GEORGE THOMAS stated, "Man, I'm ready to get back to the house [in Cincinnati]. I don't care if it ain't none or nothing, man [GEORGE THOMAS indicates that he wants to return to Cincinnati even if Blount is unable to provide him with heroin before he leaves]." Blount responded, "I told you, I'm still right here with 'Migo [Acevedo-Marchan], man." Blount then stated to Acevedo-Marchan, in the background, "Migo, tell him [GEORGE THOMAS] you sorry." Acevedo-Marchan can be heard in the background stating, "Sorry, sorry. I'll be there in a minute, okay?" LAGUADA THOMAS then spoke to Blount using GEORGE THOMAS' phone. LAGUADA THOMAS asked Blount, "Man, what you want me to do, man?" Blount replied, "I told him [GEORGE THOMAS] I'm out here waiting [at Acevedo-Marchan's residence] for this lady [heroin source of supply] to pull up. He [GEORGE THOMAS] say he got to get out of here [Chicago] or some shit. That's why I told him, man, you just want me to bring 'em back there [return the money that LAGUADA and GEORGE THOMAS gave to Blount to purchase heroin]?" LAGUADA THOMAS asked, "So it [the heroin transaction] ain't gonna happen tonight, is it?" Blount replied, "Man, we right here [at Acevedo-Marchan's residence] sitting. The lady [heroin source of supply] gave him something [a sample of heroin] and he done lost it, man. And now she saying she on her way, 20 minutes have passed. That's why I said, does he [GEORGE THOMAS] want me to bring him that back [money used to purchase the heroin]?" LAGUADA THOMAS asked, "What, the money?" Blount stated, "Yeah." After conferring with GEORGE THOMAS, heard in the background, LAGUADA THOMAS stated, "He [GEORGE THOMAS] said, yeah, if you could get to it [the money] and slide back. Slide up here where we at." Blount then stated, "Yeah, alright. Bring yours [the money

belonging to LAGUADA THOMAS] too?" LAGUADA THOMAS replied, "Might as well." I believe, based upon my knowledge of the investigation and the intercepted calls, that Blount brought back the money that LAGUADA THOMAS and GEORGE THOMAS had given him for the heroin, because Blount could not get the heroin at that time.

76. On November 24, 2010, at approximately 4:36 p.m., Blount, using Target Phone 3, received an incoming call (Call #49216) from GEORGE THOMAS. During this call, Blount stated, "Man, I'm a try and catch this motherfucker [drug courier] who stays, like in . . . U/I. That motherfucker ain't picking up [answering his phone]. But I got it [the heroin]. You know what I'm saying?" GEORGE THOMAS replied, "Right. So what you thinking, motherfucker have to come all the way [GEORGE THOMAS asks if he has to drive all the way back to Chicago to obtain the heroin from Blount]?" Blount responded, "Man, I'm trying to catch him [the drug courier]. I told 'Gree' [LAGUADA THOMAS] I'm trying to catch him so I can send him. You know what I'm saying?" GEORGE THOMAS stated, "Right, I already know. Shit, I'm so well-rested. I'm 'bout to call him [LAGUADA THOMAS] and then I'm a call you right back, alright?" Blount replied, "Alright."

77. On November 25, 2010, at approximately 3:01 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #49804) to GEORGE THOMAS. During this call, Blount asked, "How far are y'all?" GEORGE THOMAS stated, "We're here [in Chicago]. We're probably like 20 minutes away [from meeting with Blount]. 15 minutes away. Yeah, we just now, I see the Illinois town right now, bro." Blount responded, "Alright, come on."

78. On November 25, 2010, at approximately 3:33 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #49826) to GEORGE THOMAS. During this call, Blount asked,

“Where ya’ll at?” GEORGE THOMAS replied, “We heading towards, what street is it, this 75th? This 70th, oh, we on 79th [Street]. No, this 75th.” Blount asked, “And what?” GEORGE THOMAS confirmed, “We on 75th and Vincennes.” Blount asked, “Yeah?” GEORGE THOMAS stated, “Yeah, we had, we turned around now, now we headed back towards, about to go over the bridges where the highway is at. Headed back towards that way.” Blount advised, “No, man, no, go the opposite way. You got to go the other way.” Based on my knowledge of the investigation and the intercepted calls (including those set forth in the following paragraphs), I believe that at this time, Blount delivered the heroin to LAGUADA THOMAS and GEORGE THOMAS, and obtained part of the purchase money from them.

79. On November 25, 2010, at approximately 8:43 p.m., Blount, using Target Phone 3, received an incoming call (Call #49958) from GEORGE THOMAS. During this call, GEORGE THOMAS stated, “We back [in Cincinnati], bro.” Blount asked, “Okay, so what, you should be ready for me [ready to pay Blount the rest of the purchase money for the heroin] Monday then, right?” GEORGE THOMAS replied, “Yeah, yeah. Everything, everything?” Blount stated, “I gave your brother [LAGUADA THOMAS] two [200 grams of heroin].” GEORGE THOMAS responded, “Okay, then, that’s what’s up then. I didn’t know. I ain’t even got to it yet [GEORGE THOMAS had not checked the heroin].” Blount advised, “You know, I said I was gonna do what I was gonna do, you know what I’m saying?” GEORGE THOMAS remarked, “Oh, okay.” Blount advised, “I really did that cause I gotta get [an individual who completed work on a van belonging to Blount] that money Monday, you know what I’m saying?” GEORGE THOMAS remarked, “Okay, okay, okay.” Blount stated, “My van. That’s why I said that, alright?” GEORGE THOMAS remarked, “Alright. Alright, then.”

D. REGINALD BRANDON SAVAGE

1. SAVAGE Purchases 300 Grams of Heroin from Domingo Blount on November 21, 2010

80. As described in the calls described below, SAVAGE arranged to purchase 300 grams of heroin from Blount, with 150 grams being a partial payment for a 2003 silver Infiniti FX45 vehicle (hereinafter “**Infiniti**”) transferred to Blount. On November 21, 2010, Blount delivered the 300 grams of heroin to SAVAGE.

81. On November 18, 2010, at approximately 11:52 p.m., Blount, using Target Phone 3, received an incoming call (Call #45019) from SAVAGE.⁹ During this call, SAVAGE stated, “My fault. It took me a little bit longer to get back with you. How do you want to do it [conduct a heroin transaction] tomorrow?” Blount replied, “I’m gonna add it up [give SAVAGE a quantity of drugs]

⁹The identification of SAVAGE and his voice in this Affidavit is based in part on the following: During an intercepted call over Target Phone 3 (Call #18680) with LAGUADA THOMAS, Blount discussed “Brandon’s” **Infiniti** FX45. During another intercepted call (Call #18835) over Target Phone 3, Blount and “Brandon” discussed the transfer of “Brandon’s” **Infiniti** to Blount, and “Brandon” noted that the title to the vehicle was in his “girl’s” name. On March 22, 2011, surveillance observed the silver **Infiniti** FX45 parked in the driveway of Blount’s residence on 73rd Street in Chicago, Illinois. A review of the registration documentation for the **Infiniti** reflected that the title had been transferred on November 20, 2010, from a female who previously was associated with an address on Gadwell Drive in Cincinnati, Ohio, to a female, known through this investigation, specifically intercepted calls and surveillance, to be residing with Blount. A commercial database inquiry revealed that SAVAGE also was previously associated with the same address on Gadwell Drive. On November 21, 2010, during intercepted calls (Call ## 46946, 47000, 47010) over Target Phone 3, “Brandon” stated that he was staying at the “W” [W Hotel] in “downtown” [Chicago]. Records from the W Hotel, located at 644 North Lake Shore Drive, Chicago, Illinois, revealed that Reginald Brandon SAVAGE had stayed at the W Chicago on Lake Shore Drive from November 19 to November 20, 2010. Furthermore, on April 15, 2010, surveillance observed a vehicle with Ohio license plates parked at Blount’s residence, registered to another individual with the last name of Savage. A commercial database inquiry revealed that this individual is also associated with SAVAGE at an address on Lucerne Avenue in Cincinnati, Ohio. During intercepted calls (Call ## 18680, 8027) over Target Phone 3, Blount referred to the user of telephone numbers (513) 497-9086 and (513) 526-8685 as “Brandon.” Monitors intercepting the calls over Target Phone 3 compared the voices of the user of each of those phones, and determined that they were the same person. Based upon the above information, DEA has identified SAVAGE as the user of telephone numbers (513) 497-9086 and (513) 526-8685. In the summaries of the intercepted calls in this Affidavit in which SAVAGE is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to SAVAGE in each of these summaries is the same.

for that [Infiniti] and whatever else you trying to do.” SAVAGE asked, “Okay, you want me to bring the title [for the Infiniti] too?” Blount replied, “Yeah.” SAVAGE asked, “So, you can get the [Infiniti] title taken care of?” Blount stated, “Yeah, I’ll do all that.” SAVAGE stated, “Okay, that’s cool then. It’s probably gonna be just, like 150 [150 grams of heroin]. On top of whatever [in addition to the amount of heroin Blount is giving SAVAGE for the Infiniti].” Blount asked, “150 with the other 150 [300 grams of heroin]?” SAVAGE stated, “Yep.” Blount responded, “Alright.”

82. On November 20, 2010, at approximately 5:01 p.m., Blount, using Target Phone 3, received an incoming call (Call #46433) from SAVAGE. During this call, SAVAGE stated, “I think I’m gonna just go ahead and chill on out for the night up here [in Chicago], right? So I’m gonna be on deck [ready to conduct the heroin transaction], right? You know, as soon as you get the call [from the heroin source of supply], you can call me and I’ll already be close.” Blount responded, “Alright, I’ll hit [call] you.”

83. On November 21, 2010, at approximately 1:00 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #46946) to SAVAGE. During this call, Blount stated, “I’m finna get you out of here, man. I’m on my way to meet them [heroin sources of supply Gambino and Acevedo Fitz] right now.” SAVAGE responded, “Okay, that’s cool. Alright, I’m still over at the W [W Hotel, on Lake Shore Drive in Chicago].” Blount stated, “Alright.” As set forth in ¶¶ 77-86 of Complaint II, filed on the same day as this Complaint, Blount obtained 500 grams of heroin from Acevedo-Fitz at approximately 1:45 p.m. on November 21, 2010.

84. On November 21, 2010, at approximately 1:56 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #47000) to SAVAGE. During this call, Blount asked, “Where you at

right now?" SAVAGE stated, "I'm down here at the W [W Hotel on Lakeshore Drive]." Blount replied, "Where you're at, you can be downtown . . . um, I'll meet you off 13th [Street] and Michigan [Avenue] somewhere right there [to conduct the heroin transaction] ." SAVAGE stated, "Okay, I guess I'm about to head on up now."

85. On November 21, 2010, at approximately 2:15 p.m., Blount, using Target Phone 3, received an incoming call (Call #47010) from SAVAGE. During this call, SAVAGE stated, "Shit, we about to be pulling out [leaving the W hotel on Lakeshore Drive in Chicago] now. We was trying to type it [meet location] in on the navigation [GPS device] though. We was trying to . . ." Blount asked, "What street you on?" SAVAGE advised, "Shit, we, we still down here. This Lakeshore [Drive] ain't it? Yeah, we still down here by Lakeshore [Drive]." Blount then provided directions to 13th and Michigan Avenue in Chicago, Illinois. I believe that at this time, Blount delivered 300 grams of heroin to SAVAGE.

86. On November 21, 2010, at approximately 3:37 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #47050) to SAVAGE. During this call, Blount asked, "You got your seatbelt on, don't you?" SAVAGE replied, "Yeah, let me put that motherfucker on. I'm glad you said something." Blount continued, "Put that motherfucker [seatbelt] on in our city. U/I . . . police trip [Blount indicates that, since SAVAGE is transporting heroin in his vehicle, he should not attract the police's attention by not wearing his seatbelt]." SAVAGE responded, "Yeah, good-looking [U/M] was telling me [to fasten the seatbelt] too, boy." Blount stated, "Alright."

87. On November 24, 2010, at approximately 12:31 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #49126) to SAVAGE. During this call, Blount stated, "I'm just checking on you. Just making sure you made it safe, nigga [Blount wants to verify that SAVAGE

was able to return to Cincinnati with the heroin]. You ain't never call." SAVAGE replied, "Yeah, I fucked around and got in safe, man. Yeah, I damn sure did make it back alright." SAVAGE asked, "What was that [the weight of the heroin] supposed to be, like two, five, zero [250 grams], or what?" Blount replied, "Naw, that was three [300 grams of heroin]." SAVAGE continued, "Cause I ain't even broke into 'em [opened the packages of heroin] yet or nothing. I just dropped it [the heroin] on uh, what's his name [U/M], but I'm a put it [the heroin] on there [put the heroin on a scale to weight it] one more time. I'm a call you back and let you know what it [the weight of the heroin] was." Blount reiterated, "It was three [the heroin weighed 300 grams]. U/I . . . weighed it up with you." SAVAGE responded, "Okay. Alright."

E. RASHAWN CRAWFORD

1. CRAWFORD Purchases 25 grams of Heroin from Blount-Bridges on September 23, 2010

88. On September 23, 2010, CRAWFORD purchased 25 grams from Blount and Bridges, with Blount directing Bridges to give CRAWFORD 25 grams of heroin, after Bridges told Blount that CRAWFORD had \$2,000 to pay for heroin.

89. On September 23, 2010, at approximately 2:01 p.m., Blount, using Target Phone 3, received an incoming call (Call #8600) from CRAWFORD.¹⁰ During this call, Blount asked, "You

¹⁰The identification of CRAWFORD and his voice in this Affidavit is based in part on the following: During certain intercepted calls over Target Phone 1 and Target Phone 3, Blount has referred to the user of telephone number (513) 258-4731 as "Ray." Based on intercepted calls over Target Phone 3 on September 14, 2010, law enforcement officers were aware that Blount traveled to Cincinnati, Ohio. Based on this information, and the GPS location of Target Phone 3, members of DEA Cincinnati established surveillance of Blount on September 15, 2010, at a hotel in Cincinnati. On September 15, 2010, monitors intercepted multiple calls between Target Phone 3 and (513) 258-4731, in which the user of (513) 258-4731 and Blount agreed to meet at Spade Kreations in Cincinnati, Ohio. On September 15, 2010, at approximately 11:42 a.m., DEA Cincinnati observed a silver Chevrolet Malibu arrive at Spade Kreations, and further observed the driver meet with Blount, Bridges and Charles Thomas. After this meeting broke up, DEA Cincinnati followed the silver Chevrolet Malibu and observed the driver meet with another individual, and appear to hand off a package to that individual. Based on these observations, law enforcement officers initiated an investigative

here [in Chicago]?” CRAWFORD confirmed, “You already know.” Later in the call, Blount asked, “Where the fuck you at?” CRAWFORD stated, “Shit, for real, heading over to, uh, over there close to, not far from the last place [Bridges’ residence].” Blount responded, “Alright, I’m gonna head that way.”

90. On September 23, 2010, at approximately 3:47 p.m., Blount, using Target Phone 3, received an incoming call (Call #8669) from CRAWFORD. During this call, Blount asked, “Where you at?” CRAWFORD replied, “Shit, you already know. Over there, over this way [by Bridges’ residence].” Blount asked, “Hey, remember that block you was at?” CRAWFORD confirmed, “Yeah.” Blount stated, “Alright. I’m fittin to come.”

91. On September 23, 2010, at approximately 3:51 p.m., three minutes after the call described in the preceding paragraph, Blount, using Target Phone 3, received an incoming call (Call #8671) from Bridges. During this call, Bridges asked, “You know Ray [CRAWFORD] over here?” Blount confirmed, “I know.” Later in the call, Blount stated, “See what he trying to do [how much heroin CRAWFORD wanted].” Bridges asked, “You said see what he trying to do?” Blount replied, “Yeah.”

92. Approximately two minutes later, Blount, using Target Phone 3, received an incoming call (Call #8673) from Bridges. During this call, Bridges stated, “Yeah, he

stop on the silver Chevrolet Malibu. The driver produced a suspended license identifying himself as CRAWFORD. Law enforcement officers searched the vehicle and located a .40 caliber handgun and a digital scale inside the vehicle. CRAWFORD was later cited for driving on a suspended license and released. On September 15, 2010, monitors intercepted a call (Call #3315) over Target Phone 3 with CRAWFORD, using (513) 258-4731. During this call, CRAWFORD explained the traffic stop and also talked about getting the silver Chevrolet Malibu back. Law enforcement officers also identified CRAWFORD as the user of telephone number (404) 201-9940 through voice comparisons of intercepted calls involving CRAWFORD’s use of telephone number (513) 258-4731. In the summaries of the intercepted calls in this Affidavit in which CRAWFORD is identified as a speaker, monitors have listened to the calls and determined that the voice attributed to CRAWFORD in each of these summaries is the same.

[CRAWFORD] said he got two bucks [\$2,000], minus what he owes [from a previous heroin transaction].” Blount replied, “He say, so how much [money] he [CRAWFORD] say he got all together?” Bridges, in a side conversation, asked, “What you got all together?” Bridges then stated, “Two bucks [\$2,000].” Later in the call, Blount stated, “Just give him a quarter [Blount instructed Bridges to give CRAWFORD 25 grams of heroin].” Bridges remarked, “Alright.” Blount later reiterated, “Give him a quarter [25 grams of heroin]. Give him [CRAWFORD] the one [heroin] off that 75 [other heroin], you know what I’m saying?” Bridges confirmed, “Alright.” Based upon my knowledge of the investigation and the intercepted calls, I believe that Bridges, at Blount’s direction, provided CRAWFORD with 25 grams of heroin, in exchange for payment of \$2,000.

93. On September 23, 2010, at approximately 8:26 p.m., Blount, using Target Phone 3, received an incoming call (Call #8855) from CRAWFORD. During this call CRAWFORD stated, “I ain’t want shit though, just letting you know I’m back [in Cincinnati].” Later in the call, Blount asked, “[U/I] quarter [25 grams of heroin], though?” CRAWFORD advised, “Yeah, yeah, that’s what he told me. That’s why I, you know, I know, why I about gonna, huh. Is Sunday, is Sunday a bad day or shit, I can [to get more heroin]?” Blount stated, “Nah, Sunday’s a good day.”

2. CRAWFORD Purchases 60 grams of Heroin from Blount-Bridges on October 9, 2010

94. On October 8, 2010, CRAWFORD arrived in Chicago and provided Blount with money to purchase 60 grams of heroin. CRAWFORD was short approximately \$300, and the next day, brought more money to Blount at a park where Blount was playing softball. CRAWFORD then received the heroin. After CRAWFORD returned to Cincinnati, CRAWFORD and Blount discussed the quality of the heroin that Blount had provided to CRAWFORD.

95. On October 8, 2010, at approximately 8:31 p.m., Blount, using Target Phone 3, received an incoming call (Call #19121) from CRAWFORD. During this call, CRAWFORD asked, "What time do the check cashing or Western Union close down there?" Blount asked, "What you mean check cashing, what you talking about?" CRAWFORD stated, "I didn't mean the check cashing, the, uh, Western Union. [CRAWFORD needed a place to obtain cash to pay Blount for heroin]" Domingo Blount confirmed, "They 24 [hours] up here." CRAWFORD stated, "Well, shit, I'll be at you in like an hour."

96. On October 8, 2010, at approximately 9:27 p.m., Blount, using Target Phone 3, received an incoming call (Call #19177) from CRAWFORD. During this call, CRAWFORD asked, "I was about to ask you, where you wanted me to come to. I getting close to the one exit, though." Blount advised, "Man, I way on Stony. I'm on 72nd [street] and Stony [Stony Island]." CRAWFORD asked, "Come over that way?" Domingo Blount remarked, "Yeah." Later in the call, CRAWFORD stated, "Yeah, I'm about to come straight on down. Is it a check cashing place close by?" Domingo Blount stated, "Kenny will direct you to it."

97. On October 8, 2010, at approximately 10:13 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #19197) to CRAWFORD. During this call, Blount asked, "How much yours was [how much money did CRAWFORD give Blount]?" CRAWFORD stated, "I ain't even count it [money], but I believe it [money] was between six [\$6,000] and 65 [\$6,500]." Blount stated, "Alright, you said you ain't for sure." CRAWFORD confirmed, "I ain't for sure, but I know it [money] was between six [\$6,000] and 65 [\$6,500]." Blount replied, "Alright. I'm a count it [money] though. I was just, you know what I'm saying, you know I got shit locked for him [another customer] so when a mother fucker get ready and hit, you know what I'm saying." CRAWFORD

stated, "That's cool and I got uh, and I'm about to pick up another couple 100's [more heroin] from your cousin in exchange for just, whatever, that is just let me know. Then, I think it's like, should be, it's probably only like six [\$6,000], probably like around six [\$6,000]." Blount stated, "I'm a count it [money] though."

98. On October 8, 2010, at approximately 10:38 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #19218) to CRAWFORD. During this call, Domingo Blount stated, "5740 [\$5,740]." CRAWFORD replied, "Saying it's 57 [around \$5,700]? That's cool, shit, that, well, that's cool. That sound about right too though, you hear me?" Blount confirmed, "Yeah."

99. Western Union records reflect that on October 8, 2010, at 11:32 p.m., CRAWFORD received \$700.00 in cash in Chicago, Illinois.

100. On October 9, 2010, at approximately 3:30 p.m., Blount, using Target Phone 3, received an incoming call (Call #19750) from CRAWFORD. During this call, Domingo Blount told CRAWFORD to meet him at Washington Park, where Domingo Blount was playing softball.

101. Approximately ten minutes later, Blount, using Target Phone 3, placed an outgoing call (Call #19751) to CRAWFORD. During this call, Blount stated, "You just rode past me." CRAWFORD asked, "I did?" Domingo Blount replied, "Yeah, I'm right here at this diamond [softball field], right here. Where they going in by the circles. I'm behind you." CRAWFORD responded, "Alright, I'm about to turn around." I believe, based upon the intercepted calls and my knowledge of the investigation, that CRAWFORD was meeting with Blount to give him the additional money to pay for the heroin.

102. On October 10, 2010, at approximately 3:24 p.m., Blount, using Target Phone 3, placed an outgoing call (Call #20415) to CRAWFORD. During this call, Blount asked, "Hey what

color was that number [heroin] that you had got?" After asking Blount to repeat himself, CRAWFORD responded, "What color was the car [heroin]? That car [heroin] was like, it was like a tan, like a lighter color, like a light-colored car [heroin]." Blount asked, "How do you think that mother fucker running [what did CRAWFORD think about the quality of the heroin]?" CRAWFORD responded, "They [customers] said it [heroin] was cool [good quality]. They weren't complaining, said it was cool. They [customers] said, you know. They say it [heroin] was running decent [good quality], for real." Blount advised, "Okay, I'm just checking cause you know I ain't ever look at it [heroin], you see what I'm saying?" CRAWFORD stated, "Exactly. Yeah, no, they, they ain't, they said to call, they [customers] said to call when they decent, for real. They, uh, they, mother fucker ain't even said they've had not problems with it [heroin], so." Blount stated, "Right. No, cause Greasy [LAGUADA THOMAS] called me and shit." CRAWFORD asked, "What he [LAGUADA THOMAS] talking about?" Blount responded, "The car [heroin], you know what I'm saying. They say the color, what shape it [heroin] was in?" CRAWFORD responded, "Oh, he saying like, he saying like the car [heroin], like the car he got probably needed a tune up or something? Like it [heroin] wasn't all the way right [lower quality]?" Blount responded, "Yeah, yeah." CRAWFORD stated, "No, that's a lie. That's a lie. He [LAGUADA THOMAS] probably tried to fix it [add cut] himself. Tried to probably fix [cut] the car [heroin] himself. No it, no it ain't, no, as far as on your behalf, it was, it [heroin] was cool." Blount stated, "Okay, boy, cause I didn't even look at it [heroin]. Alright."

VI. PROBABLE CAUSE FOR SEIZURE WARRANTS FOR VEHICLES

103. 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 black Chrysler 300 – Vehicle Identification Number (“VIN”) 2C3LA73W86H337608 (referred to in this Affidavit as **Black Chrysler**). See ¶21 and n. 3.

b. 2003 silver Infiniti FX45 – VIN JNRBS08W73X003050 (referred to in this Affidavit as **Infiniti**). See ¶¶ 80 and 81 and n. 9.

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

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

105. 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 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.

106. 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.

107. 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.

108. 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. 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