
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

MYREON FLOWERS, aka "Diesel,"
ANWAR TRAPP, aka "Bernard Gillett," aka
"Herman Flowers," aka "Smash," and
RUDY SPACE

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

From on or about October 25, 2011 to on or about November 1, 2011, at Cook County, in the Northern District of Illinois, each of the above-named defendants, conspired with each other and with others known and unknown, to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
HOLLY BARRILE
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

November 2, 2011 at Chicago, Illinois
Date City and State

ARLANDER KEYS, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS

AFFIDAVIT

I, Holly Barrile, Special Agent, Federal Bureau of Investigation, being duly sworn, state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been so employed since approximately 1996. During that time, I have participated in investigations involving drug trafficking activities. In connection with my official FBI duties, I investigate criminal violations of the federal narcotics laws, including but not limited to, Title 21, United States Code, Sections 841(a)(1) and 846. I have also been involved in various types of electronic surveillance, and in the debriefing of defendants, witnesses, informants and others who have knowledge of narcotics trafficking. I have received specialized training in the enforcement of laws concerning the activities of narcotics traffickers.

2. I am responsible for investigating crimes that involve, among other things, the unlawful importation of illegal narcotics (21 U.S.C. §§ 952, 960 and 963), the possession with the intent to distribute controlled substances and the distribution of controlled substances (21 U.S.C. § 841), conspiracy to distribute and possess with intent to distribute controlled substances (21 U.S.C. § 846), the use of communication facilities to further these offenses (21 U.S.C. § 843(b)), as well as the laundering of monetary instruments (18 U.S.C. §§ 1956 and 1957). In conducting these investigations, I have used a variety of investigative techniques and resources including physical and electronic surveillance, the use of confidential sources and informants, and securing other relevant information using other investigative techniques. Through these investigations, my

training and experience and conversations with other special agents, as well as other law enforcement personnel, I have become familiar with methods used by narcotic traffickers to safeguard their narcotics, to distribute narcotics, and to collect and launder related narcotic proceeds.

3. The information in this Affidavit is drawn from my interviews of a cooperating source, consensual recordings, controlled purchases of narcotics, physical surveillance, information received from other law enforcement agents, my experience and training, and the experience of other agents. Because of the Affidavit's limited purpose, it does not contain all of the facts I know about this investigation.

4. At various points in the Affidavit, I will offer my interpretations of certain recorded conversations/meetings in brackets and otherwise. My interpretations of these conversations are based on my knowledge of the investigation to date and review of other interceptions, the content and context of the conversations, prior and subsequent conversation, the results of physical surveillance, conversations with other officers and agents, and my experience and familiarity with these types of investigations. Finally, the summaries of conversations do not include all potentially criminal conversations recorded during this investigation, or all statements or topics covered during the course of the recorded conversations. They do not represent finalized transcripts and may not represent the entire conversation that occurred between the identified individuals.

5. Based on the information contained in this Affidavit, I submit that there is probable cause to believe that: from on or about October 25, 2011 to on or about November 1, 2011, MYREON FLOWERS, aka "Diesel," ANWAR TRAPP, aka "Bernard Gillett," aka "Herman

Flowers,” aka “Smash,” and RUDY SPACE, conspired with each other and with others known and unknown, to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846 and Title 18, United States Code, Section 2.

6. This investigation involved the use of a cooperating source (“CS1”). CS1 was convicted of home invasion, aggravated battery, robbery, and residential burglary in the early 1990’s. Since approximately 2003, CS1 has cooperated with FBI in drug investigations, which have resulted in multiple arrests and seizures of narcotics. Since 2003, CS1 has also cooperated with local law enforcement in drug and violent crime investigations. CS1 has cooperated in these ongoing investigations in exchange for monetary payments, and has been paid by the FBI approximately \$284,000 to date. Since approximately 2010, CS1 has provided information in this investigation about narcotics trafficking by members of the Belizean Bloods street gang and their associates. I believe the information provided by CS1 has been reliable, as it has been corroborated by independently obtained evidence, including physical surveillance, the controlled purchases of narcotics, information from other confidential informants, and public source database searches.

7. As set forth below, from October 25, 2011 to November 1, 2011, CS1 and an undercover officer (“UC”) participated in a series of recorded meetings and conversations with MYREON FLOWERS (“M-FLOWERS”) and others. During these conversations, M-FLOWERS, UC, CS1, and others discussed a purported robbery of 50 kilograms of cocaine from a stash location.

A. CS1's Recorded Conversations with Vaughan and M-FLOWERS between October 20, 2011 and October 24, 2011

8. On or about October 20, 2011, at approximately 1:02 p.m., CS1 met with agents at a predetermined location. Agents searched CS1 and CS1's vehicle for weapons, drugs, and excessive money, none of which were found. At approximately 1:31 p.m., agents equipped CS1's vehicle with a concealed audio/video recorder. At approximately 1:38 p.m., agents equipped CS1 with a concealed audio/video recorder and an audio transmitter that allowed agents to monitor CS1's conversations in real time. CS1 then departed the location under surveillance.

9. On or about October 20, 2011, at approximately 1:50 p.m., agents observed Jonathan Vaughan enter CS1's vehicle. As captured on the audio/video recorder, CS1 asked, "You got a number on Myreon [M-FLOWERS]?" Vaughan responded, "No, he out of town, he went to L.A. . . . Him and his cousin from Belize [referring to Individual A] who just came in. Went to go bust a move down there. They just left yesterday."¹ CS1 said, "Damn!" Vaughan asked, "What happened?" CS1 said, "I want to holler at him on, on, on, a move [talk to M-FLOWERS about a possible robbery]." Vaughan said, "He was tryin' to holler at you too, on a move. He got a motherfucker that got that phoney money [M-FLOWERS wanted to talk to CS1

¹ The identification of VAUGHAN in this Affidavit is based upon the following: First, agents have been able to distinguish VAUGHAN's voice because that voice has been recorded several times via consensually recorded telephone calls by CS1 and during recorded meetings with CS1. Second, during particular recorded calls, VAUGHAN arranged to personally meet with CS1 and VAUGHAN's image at the meeting was captured on video (recorded by CS1), which was later reviewed by agents. Agents then compared the person who was present at those meetings with a photograph of VAUGHAN and determined that the individual was, in fact, VAUGHAN. In addition, VAUGHAN's voice was also captured on the videos recorded by CS1. Agents then compared VAUGHAN's voice with the voice captured on the consensually recorded calls made by CS1, and determined that the person to whom CS1 had spoken during those calls was, in fact, VAUGHAN. Finally, CS1 identified the person with whom CS1 met and spoke on several occasions as VAUGHAN.

about counterfeit currency]. CS1 said, “If he happen to call you when he down there, call my phone, because I need to holler at that nigger, man.”

10. On October 23, 2011 at approximately 2:55 p.m., CS1 placed a recorded call to Vaughan. Vaughan said that he talked to M-FLOWERS, who was still in L.A. and had run out of money. CS1 asked Vaughan to give CS1’s phone number to M-FLOWERS. At approximately 3:00 p.m., CS1 recorded an incoming call from Vaughan. According to Vaughan, M-FLOWERS asked him to give M-FLOWERS’ phone number to CS1. Vaughan then provided a phone number to CS1, with a (323) area code, which is a California area code.

11. On October 23, 2011 at approximately 3:19 p.m., CS1 placed a recorded call to M-FLOWERS, at the number provided by Vaughan. CS1 said, “I got a good move, real good move [referring to the possible robbery]” that could take place as soon as M-FLOWERS came back to Chicago. M-FLOWERS said he needed some cash before he could come home.² CS1 said that CS1 would try to work something out. At approximately 7:11 p.m., CS1 recorded an incoming call from M-FLOWERS. M-FLOWERS said, “I couldn’t really talk to you, but I was hollering at some *ese*’s [Spanish slang for homeboys], and they got whole demos [kilograms of cocaine] for like 20, 21 [\$20,000, \$21,000].” CS1 asked if M-FLOWERS was coming back to

² The identification of M-FLOWERS in this Affidavit is based upon the following: First, agents have been able to distinguish M-FLOWERS’ voice because that voice has been recorded several times via consensually recorded telephone calls by CS1 and during recorded meetings with CS1. Second, during particular recorded calls, M-FLOWERS arranged to personally meet with CS1 and M-FLOWERS’ image at the meeting was captured on video (recorded by CS1), which was later reviewed by agents. Agents then compared the person who was present at those meetings with a photograph of M-FLOWERS and determined that the individual was, in fact, M-FLOWERS. In addition, M-FLOWERS’ voice was also captured on the videos recorded by CS1. Agents then compared M-FLOWERS’ voice with the voice captured on the consensually recorded calls made by CS1, and determined that the person to whom CS1 had spoken during those calls was, in fact, M-FLOWERS. Finally, CS1 identified the person with whom CS1 met and spoke on several occasions as M-FLOWERS.

Chicago this week. M-FLOWERS said, “ I’m tryin’. The faster I come up on something [find drugs to sell to make money], the faster I get out of here.”

12. On October 24, 2011 at approximately 3:01 p.m., CS1 placed a recorded call to M-FLOWERS. CS1 said, “My man, he gonna give me a credit card . . . I can pay for your ticket [plane ticket from L.A.]” M-FLOWERS said, “When you talkin’ about?” CS1 said, “I’m talking about ASAP. This shit here for real . . . I can pick you up from the airport, we can slide straight on him, holler at my man, so he can let you know everything [they could meet with UC to discuss the planned robbery].” M-FLOWERS said he and his cousin flew Spirit Airlines to California.

13. On October 24, 2011 at approximately 4:44 p.m., CS1 placed a recorded call to M-FLOWERS. CS1 said that CS1 was going to pay for plane tickets for both M-FLOWERS and Individual A on Southwest Airlines, but that CS1 needed their names and birthdates in order to make the purchase. M-FLOWERS provided his birthday to CS1. M-FLOWERS said, “You know my name, man, M-Y-R-E-O-N.” CS1 asked, “Flowers, right?” M-FLOWERS confirmed. Individual A then got on the phone. Individual A spelled out his first and last names for CS1 and gave CS1 his date of birth. M-FLOWERS then got back on the phone. CS1 said that CS1 was going to purchase tickets for M-FLOWERS and Individual A to fly from “LAX [Los Angeles International Airport]” to Chicago the next day.

14. On October 24, 2011 at approximately 6:13 p.m., CS1 recorded an incoming call from M-FLOWERS. M-FLOWERS said that he was calling to confirm whether CS1 purchased tickets for him and Individual A on Southwest Airlines, and CS1 confirmed.

15. On October 24, 2011, law enforcement purchased two Southwest Airlines plane

tickets in the names of M-FLOWERS and Individual A, for travel on October 25, 2011, from Los Angeles International Airport to Midway Airport in Chicago, arriving at approximately 4:35 p.m.

B. October 25, 2011 Meeting Between M-FLOWERS, Individual A, UC, and CS1

16. On October 25, 2011, agents met with CS1 and UC at a predetermined location. At approximately 4:26 p.m., agents equipped CS1 and CS1's vehicle with a concealed audio/video recorder and equipped CS1 with an audio transmitter that allowed agents to listen to CS1's conversations in real time. At approximately 4:31 p.m., CS1 then departed the area and drove to Midway Airport in Chicago, under surveillance. Agents also equipped UC with a concealed audio/video recorder and an audio transmitter than allowed agents to listen to UC's conversations in real time, which UC activated at approximately 4:53 p.m.

(1) Recorded Conversation between M-FLOWERS, Individual A, and CS1 Prior to Meeting with UC

17. At approximately 4:48 p.m., agents observed CS1 meet with M-FLOWERS and Individual A, who were standing in the Southwest Airlines Arrivals Terminal at Midway Airport. Agents observed that, after greeting each other, M-FLOWERS, Individual A, and CS1 walked through the baggage claim area to CS1's vehicle, which was parked in an adjacent lot. At approximately 4:53 p.m., as captured on the audio/video recorder, CS1 entered the driver's seat, M-FLOWERS entered the front passenger seat, and Individual A entered the rear seat of the vehicle. Agents then surveilled CS1's vehicle as CS1 drove to the location where M-FLOWERS and Individual A were to meet the UC.

18. At approximately 4:54 p.m., as captured on the audio/video recorder, M-FLOWERS asked, "Who is this cat we're goin' to go see right now?" CS1 responded, "This is

my man [referring to UC] right, I've been knowin' him for years. He a biker type motherfucker, right, but he got a lot of connects. He more like a transporter. He'll break it down [explain everything] though." CS1 explained, "When I was getting down, getting down [selling large quantities of narcotics], dude used to drop off bricks [kilograms of cocaine] to me." At approximately 4:57 p.m., M-FLOWERS asked, "When motherfuckers tryin' to make this shit happen?" CS1 said, "I think ASAP." At approximately 5:05 p.m., as captured on the audio/video recorder, CS1 placed a call to UC and received directions on where to meet UC. Shortly thereafter, agents observed CS1 pull alongside UC's vehicle, and observed UC enter the rear seat of CS1's vehicle.

(2) Recorded Meeting with UC

19. As captured on the audio/video recorder, CS1 introduced UC to M-FLOWERS and Individual A. UC said, "I'll just lay it out, if it's something you guys want to do, cool. If not, fucking no disrespect, no hard feelings man, it's nothing. I've been running with these guys about five years. All I do is pick up and deliver. I pick up anywhere from three to five bricks [kilograms of cocaine] at a time, I deliver 'em to Kankakee, probably every other week." UC explained, "They owe me, a lot, for a lot of shit that I've done, and at this point I just want to get out, and fucking go. They're sitting with probably 50 birds [kilograms of cocaine] in that garage. I'm usually the first guy in the rotation. Here's how they do it. They bring it in, they put it in a garage, they sit on it. Then I get the call."

20. UC then explained the way he typically worked with the drug suppliers. UC said that he usually picks up the kilograms of cocaine from Berwyn or Cicero, and typically on Wednesdays. UC said that he gets a call on the Sunday before the pickup, letting UC know that

the pickup would be the following Wednesday. On that Wednesday, UC said that he gets a call around 3:00 p.m. with the address of the pickup location. UC then proceeds to the pickup location, pulls into the garage, and picks up the kilograms. UC uses a “trap [hidden compartment]” in UC’s truck, or a van, to transport the kilograms.

21. UC said, “There’s three dudes inside. One guy’s running the show, he’s the guy I talk to on the phone. The other two are fucking strapped [armed].” UC said, “There’s like 50 [kilograms of cocaine] in there and I’m just lookin’ to hit it and get the fuck out. These guys know me, I’ve been doing this a long time, so I can’t use anybody that I rotate with to do this, because they’re gonna fuckin’ know.” UC then explained that he planned to leave town after the robbery. UC then explained it was hard to find guys “to get down like this,” because this was such a large robbery and the drug suppliers would be “pissed off that they lost this amount.” UC said, “You guys wanna think on it, something you wanna do, you’re interested in, great. If not, like I said, no big deal, it’s no hard feelings.”

22. M-FLOWERS asked, “That shit [kilograms of cocaine] in the garage now?” UC said no, and explained that the pickup would probably be next week. UC then explained that the drug suppliers never use the same garage, and are in and out of the garage in less than two hours. UC further explained that, once he gets the call about the pickup, he has only 30 minutes to get to the garage, because otherwise the drug suppliers will “pick up and go.”

23. M-FLOWERS asked, “What are they?” UC said, “They’re La Familia [cartel].” M-FLOWERS asked, “Mexicans?” and UC responded, “Yeah.” CS1 asked, “They gonna be banged up [armed with guns]?” UC said, “Oh yeah . . . they’ll bang hammers [fire weapons], those two studs in there fuckin’ watchin’ this shit, those dudes are straight brazers, they’ll get after

motherfuckers [two armed drug suppliers will shoot at people].”

24. UC said, “You guys think on it man. If it’s something you want to do, great, if not--” M-FLOWERS interrupted and asked, “You say tomorrow?” UC said he planned to call the drug suppliers the next morning, and could meet with M-FLOWERS and Individual A the next afternoon.

25. M-FLOWERS asked, “How many people up in there?” UC said, “There’s one dude that runs it and there’s two dudes that are strapped [armed with guns].” M-FLOWERS asked, “So basic three,” and UC confirmed. UC then warned, “These guys are for real . . . they scare the fuck out of me. These are ear-cutting mother fuckers. If they thought I even was thinkin’ about doin’ this shit, it would be on.” Individual A asked, “So what you want us to do to the guys?” According to UC, Individual A then drew his hand across his throat, signaling death. UC said, “Whatever. If you guys want to smoke [kill] em’, great. If not, you just put ‘em down and steal their shit. I just gotta make it look like I didn’t have nothing to do with it . . . However you guys wanna pull it, I’ll play.” M-FLOWERS said, “Just pull that shit and you get your shit and roll.”

26. M-FLOWERS asked, “You know what kind of cars they drive?” and UC confirmed that he did. UC said, “You guys think on it man, because I don’t want to make somebody do something they don’t wanna do, or put somebody in a spot that they don’t wanna be in. That’s not what I’m about.” M-FLOWERS said, “We game, it’s good, we game.” UC said that he would talk to the drug suppliers tomorrow, after which UC would call CS1 to set up a meeting with M-FLOWERS and Individual A. UC said, “I don’t wanna talk on the phone,” and M-FLOWERS agreed. UC said, “If you guys are game great, if not, like I said man, I don’t wanna make

somebody do something they don't wanna do." M-FLOWERS responded, "We game." UC said, "Those guys might jerk their shit [fire weapons]. I don't want anyone at the last minute going, oh geez, I didn't know these guys were gonna bang hammers [fire weapons]."

27. M-FLOWERS asked, "That shit just sittin' dead in the garage . . . ain't no stashin' or none of that shit?" UC said, "Uh huh, no lookin' for it, it's all stacked right there." M-FLOWERS said, "Alright, we on it man." UC said, "Alright, well like I said man, think about it." M-FLOWERS said, "Ain't no thinkin' man, we on it." UC said, "However you guys wanna pull it, whatever you wanna do, just let me know what you want me to do."

28. At approximately 5:16 p.m., agents observed UC exit CS1's vehicle, return to UC's vehicle, and depart the area under surveillance. UC traveled to a predetermined location to meet with agents. At approximately 5:17 p.m., the UC deactivated the concealed audio/video recorder and transmitter and thereafter agents took possession of the recording equipment.

(3) Recorded Conversation between M-FLOWERS, Individual A, and CS1 Following Meeting with UC

29. Meanwhile, agents observed CS1's vehicle leave the area of the UC meeting, and drive to the 6300 block of South Mozart ("Mozart Residence 1"). During the drive, CS1's conversation with M-FLOWERS and Individual A was captured on the audio/video recording device. As CS1 left the meeting, M-FLOWERS said, "I already rolled that shit through my head . . . we gonna use some motherfuckin' mace . . . we gonna be strapped [armed with guns] too . . . They ain't even gonna see the mace, spray that shit under the motherfuckin' door." M-FLOWERS asked, "What the fuck we goin' transport 50 bricks [kilograms of cocaine] in?" M-FLOWERS also said, "What y'all wanna do, burn [kill] these motherfuckers?" CS1 said, "It's whatever you wanna do, I'm with it." M-FLOWERS said, "It's a whole different scenario once

you smokin' [killing] niggas, more motherfuckers involved, which I mean by police. If we make this quiet as can be, we good. We ain't gotta have no motherfuckin' police on our ass. You hear the fuckin' towns he sayin'? Berwyn and Cicero and shit. There's police out there man. Them fuckin' white people towns, ain't it? That's what I said, do this shit smooth, lay these bitches on the floor, take what we gonna take." M-FLOWERS then said that if they yelled, "Police! Get the fuck on the ground!" upon entering the garage, the drug suppliers wouldn't try to "bust [shoot]."

30. M-FLOWERS said, "If they look like they finna up [fire weapons], then you burn [kill] the motherfuckers . . . whoever the fuck try to pull somethin, just burn they ass. That's the only reason to burn 'em. They got they burner [gun] in hand, one of the motherfuckin' packs [kilograms of cocaine] is just gonna have to stay there. That's a drug deal went bad, they ain't gonna investigate." CS1 agreed. M-FLOWERS said, "Because you know when it's a drug deal, they don't investigate, they don't waste the tax payers' money to investigate shit like that. But if he just dead without looking to say what's the cause? They gonna investigate."

31. M-FLOWERS said, "We gotta be in and out, man, in and out. Fifty bricks [kilograms of cocaine]? We gotta bank these motherfuckers, knock these fools the fuck out . . . load up them fifty bricks." M-FLOWERS and CS1 then discussed that there would be three people in the garage. M-FLOWERS said, "It ain't hard to take down three motherfuckers, man. Shit, we done took down a whole damn household. This motherfucker, he a white boy [referring to UC], of course he's scared of some fuckin' Mexicans. He a hillbilly. He a hillbilly wanna get paid . . . I ain't scared of no motherfuckin' Mexicans . . . They [referring to Mexicans] hate black motherfuckers in Chicago boy, because black motherfuckers always robbin' they ass."

32. M-FLOWERS then said that they needed a car that was “clean and fast.” M-FLOWERS said, “50 birds [kilograms of cocaine], that’s a lot of bricks.” M-FLOWERS then commented that they couldn’t use a “flashy” car, because it would be stopped by police, and that a minivan might work. M-FLOWERS said, “He [UC] been runnin’ for them for how long? Over five years or some shit? They [drug suppliers] ain’t gonna be thinking about motherfuckin’ getting jacked [robbed].” M-FLOWERS asked, “You don’t think they gonna know he did it?” CS1 said, “I don’t know, it depends on how it go down.” M-FLOWERS said, “It ain’t like we goin’ tell ‘em, but at the same time when they open up the garage as soon as he’s there, we gettin’ them.” CS1 said, “However you wanna do, I’m a let you orchestrate it. However you wanna do it, that’s how we doin’ it.” M-FLOWERS said, “Shit, if that’s the case, man we can lay ‘em down [kill the drug suppliers]. Shit, I don’t give a fuck.”

33. At approximately 5:31 p.m., agents observed CS1’s vehicle park near Mozart Residence 1. At approximately 5:32 p.m., agents observed M-FLOWERS exit CS1’s vehicle and walk up to Mozart Residence 1, with CS1 and Individual A remaining in CS1’s vehicle. CS1 asked Individual A, “So what’s your thought on it?” Individual A said, “See my passport, man?” According to CS1, Individual A showed CS1 a Belizean passport, and said that he had just come from Belize and was not about to leave anyone to come back for him.

34. At approximately 5:34 p.m., agents observed Individual A exit CS1’s vehicle and talk to M-FLOWERS. As depicted and on the audio/video recording, CS1 exited CS1’s vehicle and spoke with M-FLOWERS. CS1 and M-FLOWERS agreed to talk the next day. M-FLOWERS asked, “Hey, you got some bangers [guns]?” CS1 said no, and M-FLOWERS said “I’ll call this nigga and see if he has some.”

35. At approximately 5:35 p.m., agents observed CS1 enter CS1's vehicle and depart the area under surveillance. CS1 traveled to a predetermined location to meet with agents. At approximately 5:47 p.m., agents took possession of and deactivated the concealed audio/video recorder and transmitter.

C. October 26, 2011 Meeting Between M-FLOWERS, Individual A, UC, and CS1

36. On October 26, 2011 at approximately 12:22 p.m., CS1 placed a recorded call to M-FLOWERS. CS1 said, "Dude [UC] called me, we gonna meet over there at the same spot at like 3:30 or 4:00." M-FLOWERS asked, "Today?" and CS1 confirmed. M-FLOWERS asked if CS1 would drive, and asked CS1 to pick him up at home. CS1 agreed.

37. On October 26, 2011, at approximately 3:50 p.m., agents met with CS1 at a predetermined location. At approximately 4:11 p.m., agents equipped CS1 and CS1's vehicle with a concealed audio/video recorder and equipped CS1 with an audio transmitter that allowed agents to listen to CS1's conversations in real time. Agents also equipped UC with a concealed audio/video recorder and an audio transmitter that allowed agents to listen to UC's conversations in real time. Thereafter, CS1 then departed the area and drove to the 500 block of East 92nd Street in Chicago, under surveillance.

(1) Recorded Conversation between M-FLOWERS, Individual A, and CS1 Prior to Meeting with UC

38. At approximately 4:35 p.m., agents observed CS1's vehicle park in the 500 block of East 92nd Street. At approximately 4:36 p.m., agents observed and audio/video captured Individual A enter the back seat of CS1's car, and observed M-FLOWERS enter the front seat. Agents then surveilled CS1's vehicle as CS1 drove to the location where M-FLOWERS and

Individual A were to meet with UC.

39. M-FLOWERS asked, "He [UC] talking about next week?" CS1 said, "He didn't get into details, he just called, told me to meet." M-FLOWERS asked if CS1 could get him any "38 special bullets." CS1 asked, "You still got that trey-eight [.38 caliber handgun]?" M-FLOWERS said, "I only got three shells [bullets] for it though." M-FLOWERS said, "Some nigger on the block selling some pistols too, man, for a buck fifty [\$150]. Trying to get up with him." CS1 asked, "What kind he got?" M-FLOWERS responded, "Some nines [9 mm handguns] . . . I want to pick up two of them motherfuckers if possible."

40. M-FLOWERS said, "I've been thinking about some crazy shit [how to accomplish the robbery], man . . . Water hose straight under the door, turn the water on, and shock that shit . . . man in the garage gonna get toasty . . . there's a million and one ways to do [kill] a motherfucker, man. If I can get my hands on some motherfucker smoke bombs, though boy, that'll work. They gotta come out that motherfucker. Dude [UC] said he'll play by our rules though right? He don't give a fuck?" CS1 agreed and said, "I think all he want is his ten [kilograms of cocaine], and he gone." CS1 said, "It's whatever, whatever you come up with, shit, that's what I'm ridin' with, you know what I'm saying, it's whatever."

41. M-FLOWERS then speculated that the drug suppliers would know that UC set them up. M-FLOWERS said, "The white man [UC] don't wanna be" and Individual A interrupted and said, "He don't give a fuck." M-FLOWERS said, "Well, we gotta holler at him [talk to UC], how he wanna go about this shit, because I know he don't want no motherfuckin' shoot out in his motherfuckin' van." Individual A said, "No shootout." M-FLOWERS said, "Shit, you never know. These fuckin' dumb ass Mexicans man, they might lower they shit [lower

their guns], they might not. I'm not tryin' for us to get no motherfuckin' shot either...If it's gonna go like that, I'm not motherfuckin' chancing that shit, all of us piled up in no motherfuckin' van like some motherfuckin' roaches."

42. M-FLOWERS then explained that when the UC's van went in the alley, he would have two people on the main door of the garage, and two people on the side door. M-FLOWERS said that it would be harder for the drug supplier to shoot at them if they were all spread out, but that they could easily be shot if they all rode in UC's van. M-FLOWERS said, "Instead of we being sittin' ducks, they gonna be the fuckin' sittin' duck. Cause they bust up in one fuckin' garage, we can light that whole bitch up on both sides, and who gonna get killed? Them niggas, not us... It really don't matter what kind of weapons they got if we do it like that...that's how we gonna get away smooth." M-FLOWERS further explained, "If you see two niggas here, and two niggas at the back, and y'all just in the middle of a garage, you can't do shit! You can't do a motherfuckin' thing. And we got our bangers [guns] already out. These motherfuckers ain't gonna have they shit out [drug suppliers wouldn't have their guns out]. We gonna have our shit pointed dead at these motherfuckers. They goin' try if they want [drug suppliers will try to go for their guns], but by the time they go, it's a wrap. I'm gonna burn [kill] they ass up.

43. Individual A said that they should get "a piece of pipe to make some silencers." M-FLOWERS said, "Home Depot got that shit." CS1 asked, "For what?" M-FLOWERS said, "To make a little silencer and shit." Individual A then asked M-FLOWERS a question, and M-FLOWERS responded, "Shit, we gotta get 'em real quick, man. Go on the block and find this motherfucker, so we can go buy these bitches [guns]."

44. M-FLOWERS then said that, although that UC said there would be only three

people in the garage, they also needed to be concerned about who was in the house. M-FLOWERS said that was the advantage of bringing multiple people to the robbery: “One motherfucker can watch that house, while mother fuckers in that garage, so whoever the fuck comin’ out that house, gonna get burned [killed] too.” Individual A made a comment to M-FLOWERS, and M-FLOWERS responded, “That’s why we gotta get ‘em and transform the motherfuckers [referring to putting silencers on the guns].”

45. M-FLOWERS said, “If we don’t have to burn ‘em, we ain’t goin’ burn [kill] ‘em.” M-FLOWERS said that, in case they had to “burn” the drug suppliers, everyone should wear latex gloves so they didn’t get gunpowder on their hands. M-FLOWERS also said, “Make sure you have on two shirts.” M-FLOWERS explained, “The dope goin’ in one vessel [vehicle], and we goin’ in another [vehicle], have to.” M-FLOWERS said, “These assholes [police] don’t got no type of evidence [if they use gloves and two shirts] whatsoever man, if a motherfucker get caught. Can’t say motherfuckers did nothing. It’s up to you to say, ‘Man, I don’t know what the fuck you’re talking about.’”

46. M-FLOWERS said that they are going to scream, “‘Police, get the fuck on the floor!’ That’s how you break in that bitch, exactly, just like that. ‘Get the fuck on the floor’ and boom, they gonna get the fuck on the floor. That’s how it’s supposed to go smooth. Get the fuck on the floor, motherfuckers get the zippy ties, zip them bitches up . . . We need some zippy ties, the fuckin gloves . . . ski masks.”

47. M-FLOWERS asked, “He was talking about, he pick ‘em up but, okay, so where the money at? He give the Mexicans the money, before he take the bricks [asking whether UC gave the drug suppliers money before taking the kilograms of cocaine]?” CS1 laughed, and said,

“I already know where you goin’ with it [M-FLOWERS planned to rob UC of the money].” M-FLOWERS said, “You see what’s up, right?” and CS1 agreed. M-FLOWERS said, “Cause that’s motherfuckin’ three, four bricks he talkin’ about he, he pickin’ up [UC said he picked up 3 to 4 kilograms of cocaine]. That’s a lot of fuckin’ money man. Alright, shit, we want that and the bricks, fuck the bullshit. I know we ain’t just taking the dope, but if we see money, we takin’ that money. Cause I know the Mexicans ain’t gonna just give him the bricks without no goddamn money. Unless it’s prepaid already.”

(2) Recorded Meeting with UC

48. At approximately 5:14 p.m., as captured on the audio/video recorder, CS1 pulled alongside UC’s vehicle, and agents observed UC enter the rear seat of CS1’s vehicle. UC said, “Alright, so what do you guys think?” M-FLOWERS said, “It’s a go.” UC said, “What do you want me to do, or how do you guys want to do it?” M-FLOWERS asked, “Who be inside the properties?” UC said he didn’t know, that the drug suppliers just used the garages, and that he guessed they paid people to let them use the garage for a few hours. UC said that he talked to the supplier today, and that it was “going for Tuesday [November 1, 2011].” M-FLOWERS asked, “You know the house now?” UC said no, and explained that he will know the town where the garage is on Sunday. UC said, “We gotta be together on Tuesday by 3:00,” when UC would get the address of the house. UC then asked, “I don’t know if you guys wanna roll behind me, or after I go in and get mine, you guys come up and hit it? So how you guys wanna play that?” Individual A said, “Whenever they open the garage for you man, we all gonna run in there on them.” UC said, “Alright, are you gonna like put me on the ground, make it look like...” Individual A said, “Yeah, yeah, we’ll put you on the ground.” M-FLOWERS asked, “Do you

wanna do it like that?" UC responded, "Not really!" Individual A said, "After we tape up and tie them up, we gonna put masks on their head, and we gonna put the shit in your van, and we gonna leave. If you want us to out the Mexicans' light [kill the drug suppliers], we out them light too, man. They won't say it's you, they won't know it's you, you feel me? Cause this is getting rich. This is our chance man." M-FLOWERS said, "As soon as they open the garage, you know what I'm saying, it's like, when they turn they backs . . . two comin' in the front, and one comin' through the side door, and one stayin' outside just in case somebody want to come out that house, you know what I'm saying. Secure them, move all the shit, tape they ass up, put bags over their head, and we gone."

49. M-FLOWERS asked, "What you do, you give 'em money, or what? Or it's prepaid?" UC said, "It's all prepaid, all I do is deliver. I was thinkin' maybe they had money in the house, but I don't even think they rotate through the house." Both Individual A and M-FLOWERS said they didn't want to take that long [to search the house for money] because other guys would be coming to the house after UC. Individual A and M-FLOWERS then asked what kind of guns the drug suppliers would be carrying. UC explained that the drug suppliers would have handguns on them, but they wouldn't have the guns out. M-FLOWERS said, "We gonna have ours [guns] out, so you know what I'm sayin', we got the jump . . . and plus we got the upper hand cause two coming in and one coming in through the side, so, you know what I'm saying . . . Oh yeah, they gonna bow down, else they gonna get laid down."

50. Individual A then suggested that they act like they were robbing the UC as well as the drug suppliers. M-FLOWERS dismissed the idea, because UC was planning on leaving town and because the drug suppliers did not know where UC lived. M-FLOWERS said "We tryin' to

move like clockwork. Like you say, it's motherfuckers comin' behind you, so we gotta be in and out."

51. UC then asked what kind of car M-FLOWERS and Individual A planned to use. M-FLOWERS asked the UC what kind of van he used. UC said that he uses a panel van from Enterprise Rental. M-FLOWERS said that they would ride in the UC's van, and just get out a few doors down from the alley.

52. UC and M-FLOWERS agreed that everyone would meet again on Monday [October 31, 2011], the night before the robbery. UC told M-FLOWERS to bring his whole crew to the meeting on Monday, so that everyone recognized the UC and there weren't any problems during the robbery. M-FLOWERS said, "We good, man, we good. This ain't amateur night, man. We good, we got your back to the utmost." Individual A said, "This is for the future and all, man." UC agreed and said he was getting out of town. Individual A suggested that UC could move to another country. UC asked Individual A where he was from, and Individual A said "Belize."

53. At approximately 5:26 p.m., as captured by the audio/video recorder and observed by agents, the UC exited CS1's vehicle, returned to UC's vehicle, and departed the area under surveillance. UC traveled to a predetermined location to meet with agents, where UC deactivated the concealed audio/video recorder and transmitter and transferred custody to agents.

(3) Recorded Conversation between M-FLOWERS, Individual A, and CS1 Following Meeting with UC

54. Meanwhile, agents observed CS1's vehicle leave the area of the UC meeting, and drive to the 500 block of East 92nd Street. During the drive, CS1's conversation with M-FLOWERS and Individual A was captured on the audio/video recording device.

M-FLOWERS said, "You gotta stop tellin' people information though man. Stop tellin' people who you from and where you at and all that shit." Individual A said, "Ain't no white fool gonna come to Belize for me." CS1 asked M-FLOWERS where he wanted to get dropped off, and M-FLOWERS said, "I gotta go on the block anyway [near Mozart Residence 1] and see if I can get some burners [guns]." M-FLOWERS then said that they needed to have one guy watch the front of the house during the robbery, and commented that it would be helpful if they had walkie-talkies.

55. M-FLOWERS said, "When that bitch [garage door] open up, we comin' in . . . lay that shit [guns] down, or get laid down [killed]. Your choice. If they look like they finna pull it [shoot], do 'em [kill them]. Individual A then commented on the caliber of the guns they were to use, mentioning, ".22, .25, AK [.22 caliber, .25 caliber, AK-47 assault rifle]." M-FLOWERS said, "Nigger, I done laid motherfuckers down, boy . . . that's wha- it doesn't matter, a small little gun will push your shit back, boy. You got the advantage, that's what I'm trying to tell, we got the advan- we got the upper hand. Once they run in there, ain't nobody ever did this shit to them. Once you run in there with them cannons [guns], they ain't got no choice but to . . . because if they try to pull it [shoot], they gonna get got [killed]. So what? They rather live to see another day, and just put their hands up. That ain't their coke, they just securing that shit for the big man."

56. M-FLOWERS said, "After this, man I'm not touching nothing, you understand what I'm saying, we ain't touching shit [M-FLOWERS would not personally sell his own drugs]." M-FLOWERS said that they would just direct others to move their narcotics. CS1 said, "We can probably can step on that shit too [dilute the cocaine with other chemicals to increase the volume and thereby increase profits]." M-FLOWERS said, "It's uncut, one brick is two bricks [one kilogram of pure cocaine can be doubled by diluting it with other chemicals]."

57. M-FLOWERS said, “We gotta make sure we get the big zippy ties to zip them motherfuckers, their feet and their motherfuckin’ hands up. Cause zippy ties don’t carry no prints. That, that fuckin’ duct tape do.” M-FLOWERS said it would be “smooth to get them police vests.” M-FLOWERS said that he saw a place where he could purchase police shirts and police sweaters. M-FLOWERS also discussed gagging the drug suppliers by putting a sock in their mouth. Individual A said that they could put tape over their mouths. M-FLOWERS said that you would have to wear gloves while buying the tape at the store.

58. M-FLOWERS said, “So meet back up with him [UC] Monday, and Tuesday it’s goin’ down. That’s what’s up. Still tryin’ to get up on some burners [guns] . . . So far, we workin’ with one [referring to M-FLOWERS’ .38 caliber handgun]. But we need some shells [bullets] though man, 38 shells, the special kind. M-FLOWERS then said that “Smash [TRAPP]” lost his “cannon [gun]” the other day. M-FLOWERS explained where the gun was lost, and then said, “Can’t keep straps [guns] around there, them straps be disappearing and shit. All the straps I done had over there, man, every last one of ‘em, gone.” M-FLOWERS said that he lost a “tec, with a 150 clip on it, motherfuckin’ 45’s, 45 Glock, motherfuckin’, every fucking thing is gone, motherfuckin’ pumps [describing a Tec Nine with an extended magazine, a .45 caliber Glock handgun, pump action shotguns], it’s a wrap, it’s in the wind. Only thing I got left is that damn revolver [referring to M-FLOWERS’ .38 caliber handgun]. Only reason I got it is cause I got it. Three shells in that motherfucker. Shoulda asked the white boy [UC] if he had some cannons [guns], man.”

59. M-FLOWERS said, “The thing is, when we dip off from them, where the fuck we going with this shit [kilograms of cocaine]?” CS1 asked, “Talking about to go split it up and shit

[divide the kilograms amongst the crew]?” M-FLOWERS responded, “Yeah, where the fuck we goin’ with that shit. I know we ain’t carryin’ it back on the block. Have the motherfuckin’ vehicles posted up somewhere, you know what I’m saying, and we disperse.”

60. M-FLOWERS asked Individual A and CS1 what they thought about the plan. CS1 said that s/he was cool with it. M-FLOWERS then said, “We gotta go somewhere where it’s safe [to divide the kilograms amongst the crew] . . . somewhere like a U-Haul place . . . We dealin’ with bricks [kilograms of cocaine], man, we don’t wanna get stopped [by the police] with no damn bricks. We gotta, how you say it, nonstop safe mode . . . Gotta move that shit safe, got to.”

61. M-FLOWERS said, “Believe me, I’m a put ‘em down on the floor, one way or another. All depends on how I feel, they might get knocked the fuck out. Once they on the floor, get their shit stomped in.” M-FLOWERS also told Individual A and CS1 to make sure they had their gloves on before they even get in UC’s van.

62. At approximately 5:59 p.m., agents observed CS1 park in the 500 block of East 92nd Street, and observed M-FLOWERS and Individual A exit CS1’s vehicle. Thereafter, agents observed CS1 depart the area under surveillance. CS1 traveled to a predetermined location to meet with agents. At approximately 6:15 p.m., agents took possession of and deactivated the concealed audio/video recorder and transmitter.

D. October 31, 2011 Meeting Between M-FLOWERS, Individual A, UC, and CS1

63. On October 30, 2011, at approximately 6:52 p.m., CS1 placed a recorded call to M-FLOWERS. CS1 said, “Dude [UC] wanna meet tomorrow about 10:30 . . . I don’t wanna do too much talkin’ on this phone. But he say everybody that’s goin’ to the picnic, he want ‘em on location [UC wanted to meet everyone that was going to be part of the robbery crew].”

M-FLOWERS responded, "Alright."

64. On October 31, 2011, agents met with CS1 at a predetermined location. Agents equipped CS1 and CS1's vehicle with a concealed audio/video recorder and equipped CS1 with an audio transmitter that allowed agents to listen to CS1's conversations in real time. Agents also equipped UC with a concealed audio/video recorder and an audio transmitter than allowed agents to listen to UC's conversations in real time. CS1 then departed the area and drove to the 500 block of East 92nd Street in Chicago, under surveillance.

(1) Recorded Conversation between M-FLOWERS, Individual A, and CS1 Prior to Meeting with UC

65. As depicted on the audio/video recorder, M-FLOWERS and Individual A entered CS1's vehicle at approximately 10:50 a.m. CS1 asked, "You find out about them bangers [guns] on Mozart?" M-FLOWERS said he "tried to go check 'em out yesterday, but dude wasn't home." CS1 asked, "So right now, we're just workin' with one [referring to M-FLOWERS' .38 caliber handgun]?" M-FLOWERS said, "I got access to another one, so that's two." CS1 asked, "So we just gonna go with the same plan?" and M-FLOWERS confirmed. CS1 and M-FLOWERS then talked about getting in a cab following the robbery. M-FLOWERS asked, "Today, he [UC] finna tell us the location?" CS1 responded that s/he thought so. M-FLOWERS said, "Once we get in the area tomorrow, they gonna tell him the address and then we got 30 minutes to get there [to the garage where the kilograms of cocaine were stored]."

(2) Recorded Meeting with UC

66. At approximately 11:05 a.m., as depicted on the audio/video recording, UC entered the rear passenger seat of CS1's vehicle, and met with M-FLOWERS, Individual A, and CS1. UC said, "Tomorrow man, it's on. 3:00, it's gonna be in Berwyn." UC said he would get a van

and a GPS, so they could get directions once they get the address to the garage. UC said he would find a discrete spot in a forest preserve near Berwyn to hide the van, and that everyone could meet at a Shell gas station near Harlem and 47th Street just north of I-55. UC asked, “Are you guys coming in one car, two cars?” M-FLOWERS said “Probably come in one.” UC said he would meet the crew at the gas station between 2:30 p.m. and 2:45 p.m., and then they could all travel to the forest preserve together and wait for the drug suppliers to call. UC asked, “You guys got all your shit [guns]?” M-FLOWERS said, “Yeah.”

67. M-FLOWERS then asked, “On this garage tip, they don’t never be outside the garage, right?” UC responded that the drug suppliers are always inside the garage, but they “ain’t just gonna give it up.” M-FLOWERS said, “We ain’t worried about that man.” UC said, “That’s cool. I don’t want anybody rollin’ in there thinking it’s gonna be easy cause it ain’t.” M-FLOWERS said, “No, no.”

68. M-FLOWERS asked, “They open up the garage all the way, right?” UC said yes, and then asked, “So is it still the same plan, you guys are gonna go in the van with me and then go?” M-FLOWERS said, “Yep, same plan.” UC asked, “Are you gonna bring a couple more dudes?” and M-FLOWERS responded, “Yeah.” UC said, “That’s it bro, cool?” and M-FLOWERS said, “Yep, that’s what’s up.” Individual A then told UC, “Take your steel [gun] with you too, man. You never know what’s gonna happen.” UC asked, “Take a pistol with me?” and Individual A responded, “Yeah.” UC confirmed that he would. UC then asked, “The cannons [crew members with guns] are going in first, right?” M-FLOWERS responded, “Right.” UC said he would peel around the guys with the guns so he didn’t get in their way. UC said he would see everyone tomorrow.

69. As depicted on the audio/video recorder, UC exited CS1's vehicle at approximately 11:09 a.m. UC traveled to a predetermined location to meet with agents, where UC deactivated the concealed audio/video recorder and transmitter and transferred custody to agents.

(3) Recorded Conversation between M-FLOWERS, Individual A, and CS1 Following Meeting with UC

70. Meanwhile, agents observed CS1's vehicle leave the area of the UC meeting, and drive to the 500 block of East 92nd Street. During the drive, CS1's conversation with M-FLOWERS and Individual A was captured on the audio/video recording device.

71. At approximately 11:11 a.m., Individual A said, "I don't want my gun to make noise . . . put a silencer on it." At approximately 11:16 a.m., CS1 asked, "What you think?" M-FLOWERS said, "We'll make this shit happen, man. . . I'm just runnin' back everything that this white boy tellin' us and shit." Individual A said, "First this man [UC] say that those dudes have their guns in their waist, and just now he say that they not gonna give it up so easy." M-FLOWERS said, "What else he goin' say? They got guns." M-FLOWERS commented that UC was scared of the drug suppliers. M-FLOWERS said, "If it go down, fuck 'em. Just burn [kill] these bitches and bounce. Police ain't gonna come just like that [M-FLOWERS snapped his fingers], we just gotta burn 'em and bounce . . . we gotta get the fuck on out that bitch."

72. M-FLOWERS explained, "When they open the door . . . we goin' straight in that motherfucker, you feel me? Have 'em [guns] pointed dead at a mothefuckin' head. There's three of them bitches. And each of us got one. And if that motherfucker move, if it look like he tryin' to pull something, man, burn [kill] his ass. Fuck 'em. That's the only way we gonna be safe, man. We gonna tell 'em one time, man, 'Get your hands above your fuckin' heads. And lock your fingers.' Motherfuckers ain't wanna lock fingers, it look like- burn 'em. Fuck 'em. Cause

ain't no hesitation man, cause hesitation gonna burn us." M-FLOWERS said they would tell the drug suppliers, "Put your motherfuckin' hands above your heads and get the fuck on the floor, now.' Motherfuckers don't wanna listen, man, burn 'em. Fuck it. Cause like I said, we got the jump. They ain't gonna know we comin' through that motherfucker." Individual A said, "We have five dudes and they only have the three." M-FLOWERS repeated, "Get your hands up and lock your fucking fingers now.' Motherfuckers don't wanna listen, man, burn 'em, fuck it. This ain't no fuckin' game . . . And if a motherfucker don't wanna listen, when one get burned, they gonna listen *fast*."

73. M-FLOWERS said, "Shit, we got guns in our waist, motherfuckers come out just like that, we can't do shit! Can't even try to play motherfuckin' superhero, you dig? Shit, only way you goin' play superhero is if you wanna die."

74. At approximately 11:24 a.m., as captured on the audio/video recorder, M-FLOWERS and Individual A exited CS1's vehicle. Thereafter, agents observed CS1 depart the area under surveillance. CS1 traveled to a predetermined location to meet with agents, where agents took possession of and deactivated the concealed audio/video recorder and transmitter.

D. November 1, 2011 Recorded Meeting with UC

75. On November 1, 2011, agents met with CS1 at a predetermined location. Agents equipped CS1 and CS1's vehicle with a concealed audio/video recorder and equipped CS1 with an audio transmitter that allowed agents to listen to CS1's conversations in real time. Agents also equipped UC with a concealed audio/video recorder and an audio transmitter that allowed agents to listen to UC's conversations in real time. CS1 then departed the area and drove to the area of Mozart Residence 1, under surveillance. As depicted on the audio/video recorder and observed

by agents, CS1 arrived in the area of Mozart Residence 1 at approximately 1:55 p.m.

76. Over the next 30 minutes, CS1 met with M-FLOWERS, David Flowers (“D-Flowers”), ANWAR TRAPP, and Duane Jones, among others, to discuss the planned robbery. The recorded conversation indicates that M-FLOWERS, D-Flowers, TRAPP, and Jones were waiting for three other individuals (later identified as RUDY SPACE, Individual B, and Individual C) to arrive, who were going to assist in the robbery.

77. M-FLOWERS, “They ain’t got all the burners [guns] though.” D-Flowers said, “And you say you supposed to grab that [a gun].”³ M-FLOWERS said, “This nigga supposed to give me one right now, on the block, Rudy [SPACE].” D-Flowers said, “If you woulda grabbed it [gun], when I told you to grab it, you woulda had it.” D-Flowers said, “They gonna leave the iron [guns] in the van with the white boy [UC], so when they get out, everybody clean, ain’t nothing but a traffic stop [if stopped by the police].” CS1 asked, “We gonna be good with these niggas they bringing [referring to SPACE, Individual B, and Individual C], though, they good?” M-FLOWERS said, “We ain’t got nothing to do with them.” CS1 said, “I wanna know, because I don’t fuck with everybody.” M-FLOWERS said, “You? Me too! He say them his guys, so...” Thereafter, according to CS1, Jones handed CS2 a walkie talkie for use in the robbery. As

³ The identification of D-Flowers in this Affidavit is based upon the following: First, agents have been able to distinguish D-Flowers’ voice because that voice has been recorded several times via consensually recorded telephone calls by CS1 and during recorded meetings with CS1. Second, during particular recorded calls, D-Flowers arranged to personally meet with CS1 and D-Flowers’ image at the meeting was captured on video (recorded by CS1), which was later reviewed by agents. Agents then compared the person who was present at those meetings with a photograph of D-Flowers and determined that the individual was, in fact, D-Flowers. In addition, D-Flowers’ voice was also captured on the videos recorded by CS1. Agents then compared D-Flowers’ voice with the voice captured on the consensually recorded calls made by CS1, and determined that the person to whom CS1 had spoken during those calls was, in fact, D-Flowers. Finally, CS1 identified the person with whom CS1 met and spoke on several occasions as D-Flowers.

depicted on the audio/video recorder, CS1 then walked down the block with the walkie talkie, asking every so often, "Can you hear me?"

78. CS1 said, "Don't like motherfuckers bringin' motherfuckers to the table that we don't know. You know how we move." M-FLOWERS said, "That's what I said, these your peoples. These motherfuckers for real shooters [referring to SPACE, Individual B, and Individual C]." CS asked, "So they David's [D-Flowers] people?" M-FLOWERS responded, "They his peoples. So I said, shit, let me holler at 'em. So he took me this morning [D-Flowers took M-FLOWERS to meet SPACE, Individual B, and Individual C]." CS1 asked, "You got a good vibe from 'em?" M-FLOWERS said, "I said, you don't really have to shoot 'em [drug suppliers] up if they lay 'em down [lay guns down] already. If they ain't lay 'em down, hey I can't say nothing about it." M-FLOWERS then indicated that SPACE, Individual B, and Individual C said they would shoot the drug suppliers, and M-FLOWERS said, "I said, man, less noise as possible, easier to get away."

79. M-FLOWERS and CS1 then discussed dividing up the kilograms of cocaine from the robbery. M-FLOWERS said that he told SPACE, Individual B, and Individual C, "Off the top, I'm saying you all get your two apiece, all the rest of that shit accounted for [SPACE, Individual B, and Individual C would get 2 kilograms of cocaine each, and the rest of the kilograms would be split amongst the crew]." M-FLOWERS and CS1 then discussed that they thought UC should not get harmed during the robbery. M-FLOWERS said that he told SPACE, Individual B, and Individual C not to harm UC, and stated, "If they fuck with the white boy [UC], I'm gonna smoke [kill] they ass."

80. Thereafter, surveillance observed multiple individuals enter a white van in the area

of Mozart Residence 1. At approximately 2:30 p.m., the audio/video recorder depicted and agents observed CS1's vehicle depart the area, driving in tandem with a white GMC van, a red Chevy truck, and a green Honda.

81. At approximately 2:40 p.m., agents observed UC arrive at a gas station located at Harlem and 4^{7th} Street, just north of I-55. At approximately 2:57 p.m., agents observed a white GMC van (driven by M-FLOWERS), a red Chevy truck (driven by D-Flowers), a green Honda (driven by Jones with TRAPP as a passenger), and CS1's vehicle arrive at the gas station. Agents observed UC approach CS1's vehicle and speak to CS1. As depicted on the audio/video recorder, CS1 agreed to park CS1's vehicle and get into UC's vehicle. Agents observed UC walk over to the red Chevy truck. As depicted on the audio/video , UC started to give directions to D-Flowers, and D-Flowers said, "We'll just follow them [referring to the M-FLOWERS and Jones]." As depicted on the audio/video recorder, CS1 was carrying a walkie talkie, over which M-FLOWERS, D-Flowers, and Jones were speaking. According to CS1, the crew's guns were with M-FLOWERS in the white GMC van. At approximately 3:00 p.m., agents observed UC and CS1, in UC's vehicle, exit the gas station.

82. At approximately 3:03 p.m., agents observed UC's vehicle and the white GMC van pull into a forest preserve parking lot, located west of the intersection of Joliet and Harlem in Lyons. Meanwhile, the red Chevy truck containing D-Flowers, and the green Honda containing Jones and TRAPP, did not enter the forest preserve. UC and M-FLOWERS parked near a white panel van that purportedly belonged to UC ("UC Van"). As depicted on the audio/video recorder, UC approached the white GMC van and spoke to M-FLOWERS. M-FLOWERS explained that he was going to park his van. UC said, "Park it here cause we could break up all the shit [divide

the kilograms of cocaine amongst the crew] and just get out right here.” M-FLOWERS asked, “Right here? UC said, “Yeah, just jump in with me right now [referring to the UC Van].” UC then observed M-FLOWERS, SPACE, Individual B, and Individual C moving from the white GMC van near the UC Van. CS1 observed Individual B load a tool box from the white GMC van into the UC Van. UC said, “I should be getting a call [from the drug suppliers] any second, man.” M-FLOWERS said, “They goin’ jump in [referring to SPACE, Individual B, and Individual C]. We goin’ make sure the perimeter over there is good [D-Flowers, TRAPP, and Jones were doing surveillance]. They goin’ jump out and get in here [referring to SPACE, Individual C, and Individual C].” Agents then observed SPACE, Individual B, and Individual C enter the UC Van.

83. At approximately 3:05 p.m., law enforcement arrested M-FLOWERS, SPACE, Individual B, Individual C, TRAPP, D-Flowers, and Jones. Agents observed that SPACE, Individual B, and Individual C were wearing blue latex gloves.

84. A search of the UC Van revealed a .45 caliber handgun, a Highpoint semi-automatic handgun, and a .38 special revolver, which were contained in the tool box that CS1 observed Individual B place in the van. A search of the green Honda revealed a walkie talkie. A search of Jones’ person incident to arrest revealed a receipt for walkie talkies.

85. Following the arrest, TRAPP was advised of his rights, signed a written waiver of rights, and agreed to make a statement. TRAPP stated that he and Jones were assigned to do surveillance on the perimeter of the robbery and to look out for police. According to TRAPP, M-FLOWERS told TRAPP about the robbery two days prior to his arrest. According to TRAPP, M-FLOWERS said he knew an old white dude who used to be a drug courier for the cartels, and the dude was upset because the cartels had been shortchanging him. M-FLOWERS told TRAPP that the white dude

knew about a house that was supposed to have 50 to 100 “kilos” in it. According to TRAPP, M-FLOWERS didn’t know where the house was located, was supposed to meet the white dude, and the white dude was supposed to get a phone call with the address. TRAPP said that on November 1, 2011, TRAPP met with M-FLOWERS, D-Flowers, Jones, and three other guys whom TRAPP did not know, at Mozart Residence 1. TRAPP said that the three other guys were dropped off at Mozart Residence 1, and got into the white GMC van with M-FLOWERS. TRAPP said that he got into a green Honda with Jones. TRAPP stated that he did not know there was a walkie talkie in the car until Jones picked it up and turned it on. TRAPP understood that the plan was for him and Jones to follow M-FLOWERS in the white van, watch it park, then surveil the area for police and call on the walkie talkie if they saw anything. According to TRAPP, everyone met up at a gas station, but after they left the gas station, TRAPP and Jones lost sight of the van. When they lost the van, Jones tried to call M-FLOWERS and D-Flowers over the walkie talkie but no one answered. According to TRAPP, Jones said over the walkie talkie, “If you can hear me, switch to the channel of the number of kids I have.” According to TRAPP, no one ever responded on the radio. Thereafter, TRAPP and Jones were arrested. TRAPP stated that he wanted to be involved in the robbery because his three cousins (M-FLOWERS, D-Flowers, and Jones) were involved and TRAPP wanted to make sure nothing happened.

86. Following the arrest, SPACE was advised of his rights, waived his rights, and agreed to make a statement. SPACE stated that, on the morning of November 1, 2011, in his neighborhood near Mozart and Wolcott, his friend “Tracy,” asked him if he wanted to work on a white guy’s house. SPACE agreed, and got into a white van with Tracy, another individual, and the driver of the van. Once SPACE got into the van, the driver of the van, told SPACE and the other individuals that they were going to do a “lick,” which SPACE understood to mean a robbery. According to SPACE, the driver said that a white guy was going to show them a garage that they

were going to rip off. SPACE believed that the garage was going to contain cocaine or marijuana. SPACE said that he believed that guns were going to be used, but that since he was never given a gun, he thought he was supposed to act as a lookout for the robbery. SPACE further admitted that he put a latex glove on his right hand.

87. Based on the foregoing, I submit that there is probable cause to believe that from on or about October 25, 2011 to on or about November 1, 2011, MYREON FLOWERS, aka "Diesel," ANWAR TRAPP, aka "Bernard Gillett," aka "Herman Flowers," aka "Smash," and RUDY SPACE, conspired with each other and with others known and unknown, to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846 and Title 18, United States Code, Section 2.

FURTHER AFFIANT SAYETH NOT.

Holly Barrile
Special Agent, FBI

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 2nd DAY OF NOVEMBER, 2011

ARLANDER KEYS
United States Magistrate Judge