
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **AMENDED CRIMINAL COMPLAINT**
 :
 v. :
 :
 ROBERT COVINGTON, : Honorable Cathy L. Waldor
 a/k/a "Nachie," :
 KOREY SMITH, :
 a/k/a "Murda," :
 JEFFREY WORKMAN, :
 a/k/a "Rah," :
 YVONNE JACKSON, :
 a/k/a "Tiny," : Mag. No. 21-9212
 CARLOS STOKES, :
 a/k/a "Ab," :
 KAREN GAMBLE, :
 ALAA COVINGTON, : **FILED UNDER SEAL**
 WILLIAM LANE, and :
 LEROY BAXTER, III :
 :

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

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

/s/ Christopher Johnson

Christopher Johnson, Special Agent
Federal Bureau of Investigation

Sworn to and subscribed via telephone pursuant to Fed. R. Crim. P. 4.1
March 25, 2021, New Jersey

Honorable Cathy L. Waldor
United States Magistrate Judge

/s/ Hon. Cathy L. Waldor / ES
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Conspiracy to Distribute Fentanyl)

From at least in or around August 2020 through in or around March 2021,
in Essex County, in the District of New Jersey and elsewhere, defendants,

ROBERT COVINGTON,
a/k/a “Nachie,”
KOREY SMITH,
a/k/a “Murda,”
JEFFREY WORKMAN,
a/k/a “Rah,”
YVONNE JACKSON,
a/k/a “Tiny,”
CARLOS STOKES,
a/k/a “Ab,”
KAREN GAMBLE, and
ALAA COVINGTON,

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

COUNT TWO
(Conspiracy to Distribute Cocaine)

From at least in or around August 2020 through in or around March 2021, in Essex County, in the District of New Jersey and elsewhere, defendants,

ROBERT COVINGTON,
a/k/a “Nachie,”
JEFFREY WORKMAN,
a/k/a “Rah,”
YVONNE JACKSON,
a/k/a “Tiny,”
CARLOS STOKES,
a/k/a “Ab,” and
KAREN GAMBLE,

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT THREE
(Conspiracy to Distribute Heroin)

From at least in or around January 2021 through in or around March 2021, in Essex County, in the District of New Jersey and elsewhere, defendants,

KOREY SMITH,
a/k/a “Murda,”
WILLIAM LANE, and
LEROY BAXTER, III,

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Christopher Johnson, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, recordings, and other items of evidence. Where statements of others are related herein, they are related in substance and part. Where I refer to the contents of previously recorded conversations (e.g., consensual recordings or prior wiretap interceptions), quotations and descriptions are based on preliminary draft transcripts and/or translations of those conversations. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

OVERVIEW OF THE CONSPIRACIES

1. From at least as early as in or around August 2020, there have been multiple individuals involved in selling fentanyl and cocaine in and around the Bradley Court Housing Complex in Newark, New Jersey (“Bradley Court”). These individuals comprise at least two drug trafficking organizations (“DTOs”), which have overlapping membership.

2. DTO-1 involved individuals engaged in the distribution of fentanyl and included, but was not limited to, Robert Covington, a/k/a “Nachie” (“Covington”), Korey Smith, a/k/a “Murda” (“Smith”), Yvonne Jackson, a/k/a “Tiny” (“Jackson”), Karen Gamble (“Gamble”), Jeffrey Workman, a/k/a “Rah” (“Workman”), Carlos Stokes, a/k/a “Ab” (“Stokes”), and Alla Ibeh Covington (“Alla”).

3. DTO-2 involved individuals engaged in the distribution of cocaine and included, but was not limited to, Covington, Jackson, Gamble, Workman, and Stokes.

4. Additionally, Smith—the fentanyl supplier for DTO-1—was also engaged in distributing heroin in and around his residence on Fairmount Avenue (the “Fairmount Location”) in Newark, New Jersey from at least January 2021 to the present. Smith, together with William Lane (“Lane”), Leroy Baxter, III (“Baxter”), and others, constituted DTO-3.

THE DEFENDANTS AND THEIR ROLES

5. At various times relevant to this Criminal Complaint, Robert Covington was one of the leaders and organizers of DTO-1’s and DTO-2’s distribution of fentanyl and cocaine in or around Bradley Court. To do so, Covington purchased powder cocaine and fentanyl from various sources of supply, including Smith; “cooked” powder cocaine into crack cocaine or directed

others to do so; used various “stash houses” to store and distribute fentanyl and cocaine and to store narcotics proceeds; and employed multiple drug dealers, including Workman, Jackson, Stokes, and Alaa, among others, to distribute fentanyl and cocaine to the area surrounding Bradley Court. Covington also stored a portion of his narcotics supply and proceeds at Gamble’s residence on Bragaw Avenue in Newark (the “Bragaw Location”).

6. At various times relevant to this Criminal Complaint, Smith supplied DTO-1 with bulk quantities of narcotics. Specifically, Smith supplied Covington and others in DTO-1 with fentanyl.

7. At various times relevant to this Criminal Complaint, Covington, Workman, Jackson, Stokes, Gamble, and Alaa worked together as parts of DTO-1 and DTO-2 to distribute narcotics out of a residence located on North Munn Avenue (the “North Munn Location”), as well as in the buildings and streets surrounding Bradley Court.

8. At various times relevant to this Criminal Complaint, Smith, Baxter, and Lane worked together in DTO-3 to distribute heroin in or around the Fairmount Location.

THE INVESTIGATION

9. From at least as early as in or around August 2020, various law enforcement agencies have investigated the open-air narcotics market in and around Bradley Court. During the investigation, law enforcement obtained court orders authorizing the interception of wire and electronic communications occurring over cellular telephones used in furtherance of the DTOs’ narcotics trafficking. As set forth throughout this Criminal Complaint, these wiretaps, in conjunction with surveillance, controlled purchases, car trackers, phone trackers, and search warrants, among other investigative techniques, have revealed the operational structure and inner workings of the DTOs and the method and means by which they carried out their narcotics-trafficking conspiracies.

10. During this investigation, law enforcement utilized a confidential source (the “CS”) to purchase controlled substances from members of the DTOs. From in or around August 2020 through in or around March 2021, the CS conducted at least twenty controlled purchases of heroin, fentanyl, and cocaine from at least five members of DTO-1, DTO-2, and DTO-3, including Covington, Smith, Jackson, Baxter and Workman.

11. Laboratory analysis of these controlled purchases has confirmed that for each controlled purchase of heroin from DTO-1 the substance in fact contained both heroin and fentanyl. The aggregate weight of the controlled purchases involving fentanyl exceeds 40 grams. Further, laboratory analysis of

the cocaine purchases has confirmed that the substance purchased was in fact cocaine.

Covington's Role in DTO-1 and DTO-2

12. Wiretap interceptions, surveillance, controlled purchases, and other investigative techniques have revealed that Covington is a leader and organizer of DTO-1 and DTO-2. Covington facilitated the purchase of fentanyl and cocaine—in part from Smith—cooked and packaged the cocaine for distribution and directed his dealers to sell these controlled substances on the street.

13. Covington runs both DTO-1 and DTO-2 primarily out of the North Munn Location. In numerous telephone conversations, Covington makes clear that he is the leader of DTO-1 and DTO-2. For example, on or about January 1, 2021, Covington placed a call to Workman. During the conversation, which was intercepted by law enforcement, Covington discussed how another dealer owed him money:

Covington: Yo how you going to tell he owed me 85 when he owed me 95?

Workman: Cause he had, he had umm, he was over. So I told him just take 10 from the 95.

. . .

Covington: That's why I said he owed 95; You going to come behind me and say "you only owe 85" I told you what it was. He gave me money for the last package, he finished the last package and he gave me 35 dollars for the next buy. I said he owed 5 for the girl and 90 dollars for the bundle. Where you get 85 from bro? [] Ya'll bad followers, ya'll bad followers.

Workman: Ok man.

Covington: I wish it was ya'll that has the block and I showed ya'll how not to fuck up some money . . . you go to a job, boss says to do something, you do it the was boss says do it.

Based on my experience and training and knowledge of the investigation, Covington is scolding Workman for collecting the wrong amount of money and explaining that Covington "has the block" and is the "boss."

14. On or about January 3, 2021, Covington called Jackson. During the conversation, which was intercepted by law enforcement, Covington discussed how his dealers kept getting robbed:

Covington: I just wanted to keep you on point.

Jackson: Uh Huh. Yeah, as you should. I don't need to be robbed with nobody.

Covington: That's why I said I want to find an apartment around here, find a room, an apartment, a 1 bedroom, you know what I mean?

Jackson: Yeah.

Covington: Then we'll just move our operations, away from here.

Jackson: Yeah.

Based on my training and experience and knowledge of the investigation, Covington was discussing moving DTO-1's and DTO-2's operations to avoid Covington's dealers getting robbed.

15. Both surveillance and Covington's involvement in controlled purchases also show that Covington was the leader of both DTO-1 and DTO-2. Covington was involved in at least twenty controlled purchases and was observed nearly every week throughout the duration of the conspiracies distributing controlled substances from the North Munn Location.

Smith Supplied Fentanyl to DTO-1

16. Wiretap interceptions, surveillance, controlled purchases, and other investigative techniques have revealed that Smith supplied fentanyl to DTO-1, which Covington, Workman, Jackson, Alaa, and other members of DTO-1 then distributed in or around Bradley Court.

17. For example, between October 2020 and February 2021, the CS purchased controlled substances at least five times from Covington. During each of these controlled purchases, Covington first purchased the fentanyl from Smith before selling it to the CS. Each of these controlled purchases was recorded by video and audio. Additionally, during many of these controlled purchases, law enforcement surveilled Smith during the controlled purchase and observed him make contact with Covington before Covington sold fentanyl to the CS.

18. Additionally, wiretap interceptions confirm that Smith supplied fentanyl to DTO-1. For instance, on or about January 22, 2021, before a

controlled purchase involving the CS, Covington contacted Smith. During that intercepted conversation, Covington and Smith had the following exchange:

Covington: Ummm, I need a ride to 8th street.

Smith: Aight, uhh, do the same thing you did but like, have them go in Rite Aid and walk up, cool?

Covington: I have to catch a Lyft [pause] ummmm

Smith: Oh you ain't driving?

Covington: Nah, and I'm at the doctor's office anyways. I ain't ready but umm, he ready.

Smith: Aiight, so get the money and everything and I'll pull up on you.

Covington: Ok, perfect.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Covington and Smith were planning to meet to conduct a narcotics transaction.

19. Other interceptions confirm that Smith was providing narcotics to Covington and other members of DTO-1 for distribution. For example, on or about December 24, 2020, Smith called Covington. During the conversation, the following exchange took place:

Smith: I'm a put some cents on your lap, I'm a come holla at you -- but you don't gotta put your own bread up, I could just put them shits in your lap and you could use your bread to do something else.

Covington: Alright pay up.

. . . .

Covington: What's his name?

Smith: I got like 5 or 6 different ones, I got Frank Lucas, I got like five different ones.

Covington: Yeah I like them names.

Smith: Yeah I got some shit for you boy, I got --

Covington: What's the damage?

Smith: 175

Covington: Alright.

Smith: But like I said, I put 50 on your lap -- start with 25 at a time, see how you like it, see how you flow but I mix em up, I do 5 of each one, and then if you good, you know if it works out for you, we'll take it from there.

Covington: Okay.

Based on the content of this conversation, my training and experience, as well as my knowledge of the investigation, Smith was explaining to Covington that Smith could provide Covington quantities of heroin with different stamps ("names") without Covington having to front the money.

Gamble's Role in DTO-1 and DTO-2

20. Wiretap interceptions, surveillance, and other investigative techniques have revealed that Gamble utilized her home as a stash house to store both narcotics and narcotics proceeds for both DTO-1 and DTO-2.

21. For example, on or about January 5, 2021, Covington received a telephone call from Gamble. During that conversation, which was intercepted by law enforcement, Covington and Gamble had the following exchange:

Covington: 10, 20, 30 . . . what?

Gamble: Huh

Covington: I'm trying to remember how many cans of dog food¹ I counted last. I took 10 that was 20 and there was 11 over here that was 31 right?

Gamble: Hmmm yah we got 20 here.

. . .

Gamble: You gotta be careful about writing stuff down.

Covington: yeah I try not to but its really dang hard all you gotta do is count money and merchandise. Money and merchandise. Like money and merchandise that's all you gotta do is count money and merchandise.

¹ Based on my training, experience, and knowledge of the investigation, I believe that "dog food" refers to heroin.

Gamble: Okay.

Covington: You know what I mean?

Gamble: Yeah.

Covington: You got 50 cans of dog food, and you got 50 cans of ice cream, you bag that up, ok, that's this is what it was supposed to come out to you know what I mean. Minus what you pay. Minus your payroll. You know what I Mean? Of course you're going to spend a few dollars here and there but I don't, this shit be driving me crazy yo, this shit be way off, it be way off.

. . .

Covington: And I'm like you lock the door cuz Alaa know how to get in the house and Alaa will come over here and steal some shit you hear what I'm saying?

Gamble: Uh huh, that's not good . . . I'll start paying more attention.

Based on my training and experience, and knowledge of the investigation, Covington and Gamble were discussing how much cocaine and narcotics proceeds remained at Gamble's residence. Additionally, Covington is complaining that money seems to be missing, and Gamble says that she will start paying more attention.

22. As another example, on or about February 10, 2021, Covington contacted Gamble. During that conversation, Covington and Gamble had the following exchange:

Covington: Nah I was talking to Rah, you home today right baby?

Gamble: Yeah

Covington: Alright, I'm sending Rah to you to get that box, ok?

Gamble: The whole box?

Covington: uh, unless y'all can, who there? You can't, unless you go in it, you gotta figure out which is which. You can give him 5 and 5.

Based on my experience and training, and knowledge of the investigation, Covington was directing Gamble to give Workman (a/k/a “Rah”) narcotics from her residence.

Workman’s Role in DTO-1 and DTO-2

23. Wiretap interceptions surveillance, and other investigative techniques have revealed that Workman was involved in distributing narcotics for both DTO-1 and DTO-2.

24. For instance, on or about January 20, 2021, Covington called Workman. During the conversation, the following exchange occurred:

Covington: I need, how many pills? Send me, send me 10 and 10. Send me 10 and a bundle down.

Workman: No dope just coke? How many you want?

Covington: Light we good, police coming down. Rah don’t throw it until they leave.

Workman: I heard you.

Based on this conversation and my knowledge of the investigation, Covington was asking Workman to throw him down drugs from the window of the North Munn Location², but to wait until the police were gone to do so. This conversation also makes clear that Workman was involved in distributing both heroin and fentanyl (“dope”) and cocaine (“coke”) for DTO-1 and DTO-2.

25. As another example of Workman’s role, on or about January 25, 2021, Covington called Workman. During the conversation, which was intercepted by law enforcement, the following exchange took place:

Covington: What you say? It’s that slow boy. You only had two boy. You only had two.

Workman: I got four of wolf and two hots left.

Covington: You got like what four. Slices, fingers, pies. You got like four what left?

Workman: Four bodies of wolf and two of the hot.

Based on this conversation and my knowledge of the investigation, Covington and Workman were discussing how drug sales were slow at that point. They

² Throughout the course of the investigation, members of DTO-1 and DTO-2 often threw narcotics out of the window on the North Munn Location.

were also discussing the amount of heroin Workman had left, which included bags with the stamps “wolf” and “red hot,” which both Covington and Workman were known to distribute at this time.

26. Additional intercepted conversations show that Workman helped Covington manage the other drug dealers in DTO-1 and DTO-2. For instance, on or about December 27, 2020, Covington placed a call to Workman. During the conversation, the following exchange occurred:

Covington: Ten and ten. What he got? He got twenty and twenty or ten and ten?

Workman: He has I guess sixteen now. Twenty-six. Cuz he got six from uh, from the last pack. That’s what he didn’t get rid of. And I just, the pack that I just gave him. They are packs of twenty. So it’s uh twenty-six.

Covington: Stop doing that. Take the six from him.

Workman: Alright.

Covington: Don’t give him more than twenty. He not good. Well he alright. He been alright.

Based on the context of the conversation, Covington was directing Workman to only give a limited supply of narcotics to one of Covington’s other dealers.

27. Both physical surveillance and Workman’s involvement in controlled purchases also confirm his role in DTO-1 and DTO-2. For example, on or about January 18, 2021, law enforcement observed Workman conduct numerous hand-to-hand narcotics transactions from the porch of the North Munn Residence. Workman was also involved in the sale of controlled substances during controlled purchases with the CS in January 2021 and March 2021.

28. Additionally, when narcotics buyers contacted Covington for narcotics during the conspiracy, he frequently told them to contact either Workman or Jackson directly and provided the buyers with Workman’s and Jackson’s phone numbers to facilitate the sales.

Jackson’s Role in DTO-1 and DTO-23

³ Upon Jackson’s arrest, she confirmed that her nickname is “Tiny” and that she is the owner of the cellular device that was intercepted by law enforcement during the course of these conspiracies.

29. Wiretap interceptions, surveillance, and other investigative techniques have revealed that Jackson was working for Covington by distributing narcotics for both DTO-1 and DTO-2.

30. For example, on or about December 31, 2021, Covington placed a call to Jackson. During the conversation, the following exchange took place:

Jackson: I got \$160 and I got 12 boys left. You want the \$160. Want me to bring it back to you?

Covington: I'm going to the diner, so...

Jackson: Oh ok.

Covington: Alright.

Jackson: Alright.

Covington: Yeah but as soon as you can. I'm, I'll send Rah back there.

Based on my experience and training, and knowledge of the investigation, Jackson was telling Covington that she had \$160 of drug proceeds and 12 "boys" (a/k/a heroin) and asked Covington if he wanted her to bring the money now.

31. Jackson also frequently arranged to "re-up" from Covington—which, based on my training, experience, and knowledge of the investigation, means to obtain an additional supply of narcotics to sell. For instance, on or about January 7, 2021 Jackson contacted Covington. During the conversation, which was intercepted by law enforcement, the following exchange occurred:

Covington: What up Tiny.

Jackson: How you doing?

Covington: I'm ok.

Jackson: You in the house?

Covington: Yeah.

Jackson: Yeah I'm coming I need more.

Covington: Okay.

Based on my experience and training, and knowledge of the investigation, Jackson was telling Covington that she needed to "re-up" additional supply ("I need more.").

32. Covington and Jackson also discussed selling heroin, fentanyl, and cocaine. For instance, on or about January 22, 2021 Covington called Jackson. During the conversation, which was intercepted by law enforcement, the following exchange took place:

Covington: Aiight, so I still gotta get it and come back it's only um . . . Wolf and Red Hot left, um unless I can call her real quick and see what she got.

Jackson: Okay.

Covington: Aiight.

Jackson: Aiight.

Covington: You dry-dry? What about the ice cream, what's takin' so long with the ice cream?

Jackson: I'm not done yet. I'm almost there.

Covington: Aiight.

Based on this conversation, my knowledge of the investigation, and my training and experience, Jackson and Covington were discussing the sale of heroin, fentanyl, and cocaine (including the stamps "Wolf and "Red Hot"). Additionally, DTO-2 frequently refers to cocaine as "ice cream."

33. Jackson's involvement in controlled purchases also confirms her role in DTO-1 and DTO-2. For example, Jackson was involved in the sale of controlled substances during controlled purchases to the CS in August 2020 and November 2020.

Stokes's Role in DTO-1 and DTO-2

34. Wiretap interceptions, surveillance, and other investigative techniques have revealed that Stokes was involved in distributing narcotics for both DTO-1 and DTO-2.

35. For example, on or about December 20, 2020, Covington called Stokes. During the conversation, which was intercepted by law enforcement, the following exchange occurred:

Covington: What you got left bro?

Stokes: I gave you twenty-five. I got like 7, 8 left.

Covington: Alright.

Stokes: Yeah, five off right quick. Probably going to take it down later . . . Alright?

Based on this conversation, my knowledge of the investigation, and my training and experience, Stokes and Covington were discussing the supply of narcotics that Stokes had left to sell.

36. As another example, on or about December 23, 2020 Covington received a call from Stokes. During the conversation, which was intercepted by law enforcement, the following exchange occurred:

Stokes: Wassup? I need uh, 5 papers.

Covington: Alright, here I come.

Stokes: But yo, you could throw me about 2 buns anyway, while I'm out here.

Covington: Alright.

Based on this conversation, my knowledge of the investigation, and my training and experience, Stokes was asking Covington for an additional supply of narcotics to sell (*i.e.* a “bun” or “bundle,” which is approximately ten individual packets of heroin or fentanyl).

37. As another example of Stokes's role in DTO-1 and DTO-2, on or about December 26, 2020, Covington called Stokes. During the conversation, which was intercepted by law enforcement, Covington stated, “I have five more, uh, ice cream for ya. So when ya'll come back out grab that.” As discussed above, DTO-2 refers to cocaine as “ice cream.” The following day, Covington called Stokes. During that conversation, Covington asked Stokes if he had “Grand Champion,” which is a stamp of heroin and fentanyl that the investigation has revealed that DTO-1 sells.

38. Physical surveillance further confirms Stokes's role in DTO-1 and DTO-2. For example, on or about March 15, 2021, law enforcement observed Stokes conduct a hand-to-hand narcotics transaction inside a vehicle parked outside the North Munn Residence.

Alaa's Role in DTO-1

39. Wiretap interceptions, surveillance, and other investigative techniques have revealed that Alaa was involved in distributing narcotics for DTO-1.

40. For instance, on or about January 1, 2021, Alaa called Covington. During that conversation, which was intercepted by law enforcement, Alaa and Covington had the following exchange:

Alaa: What's your stamp names?

Covington: My what?

Alaa: Your stamp names.

Covington: Food you mean?

Alaa: You said what?

Covington: The dog food?

Alaa: Yeah.

Covington: Um, Red hot, Wolf, and 999.

Alaa: Alright.

Covington: Alright, where you at?

Alaa: I'm on my way back to you.

Based on my experience and training, Alaa was asking Covington which stamps of heroin he had left.

41. As another example, on or about January 27, 2021, Alaa called Covington. During that conversation, Alaa and Covington had the following exchange:

Alaa: Daddy, what you wanted again? 44?

Covington: Whats that babe? . . . what you mean baby?

Alaa: Merch. Merch.

Covington: I did it already. What you mean?

Alaa: Somebody already wanted to know the name.

Covington: Oh no you talking about that for ice cream. For the dog food its um 17, 5, 175. The ice cream. You get what I'm saying.

Alaa: Ya.

Covington: Is 44 and the dog food is 175. And its wolf.
And its red hot.

Alaa: Dog food.

Covington: 175, expensive. I don't hold it for nothing.

...

Alaa: What about ice cream?

Covington: Ice cream I do I get it for 44. But if it ain't
your people, charge em. Ha, Ha.

Based on my experience and training, and knowledge of the investigation, Covington was explaining to Alaa the different code names for heroin and cocaine used by DTO-1 and DTO-2 and explaining what to charge for each of them.

Smith's Role in DTO-3

42. Wiretap interceptions, surveillance, and other investigative techniques have revealed that Smith distributed narcotics to and in conjunction with Lane, Baxter and others in support of DTO-3.

43. For instance, on or about February 28, 2021, Smith called Lane. During the conversation, which was intercepted by law enforcement, the following exchange took place:

Smith: So as I get them bars I'm a hit you.

Lane: Yeah all in that IA possibly "B".

Smith: Oh I ain't got none of that.

Lane: You won't be getting none?

Smith: Nah. I got none of that.

Lane: Ok.

Smith: Nah. I got none of that.

Lane: Ok.

Smith: [] you ain't got no bars right?

Lane: Nah, we need them desperately bro.

Smith: Yeah, I know I'm waiting on them shits.

Based on my experience and training, and my knowledge of the investigation, Smith and Lane were discussing narcotics and whether Lane and Smith had any left for distribution.

44. As another example, on or about March 6, 2021, Smith called Lane. During the conversation, which was intercepted by law enforcement, the following exchange occurred:

SMITH: Yeah I don't got that many, Ima bring you 200 bars.

Lane: Aww that's what I'm talking.

SMITH: Put a few hundred on them and shit cause, I only had 2,000 of them shits, I only got like 400 left so Ima bring you 200 and then uh, I got them shits yesterday too.

Lane: That's it? Ain't no more?

SMITH: Ima get, the guy he just came back in the county so I gotta wait. I got 2,000 of em but you know, I had so many people waiting for so long, them shits went but I just saved you 200.

Based on my experience and training, and knowledge of the investigation, Smith and Lane were discussing narcotics and how much Smith had left to provide to Lane for distribution.

45. Smith was also involved in controlled purchases of heroin by the CS at least twice between January 2021 and March 2021, which further establishes Smith's participation in distributing narcotics as part of the conspiracy with DTO-3.

46. Physical surveillance of Smith also confirms his role in DTO-3. For instance, on or about February 26, 2021, law enforcement observed a known narcotics buyer (the "Buyer") arrive at the Fairmount Location. Law enforcement then observed the Buyer approach the Fairmount Location, enter the doorway, and, less than one minute later, exit the Fairmount Location with Smith. The Buyer then reached into his vehicle and placed an unknown object in Smith's hand. Based on my experience and training and the context of the transaction, I believe that a Smith was conducting a narcotics transaction with the Buyer.

Lane's Role in DTO-3

47. Wiretap interceptions, surveillance, and other investigative techniques have revealed that Lane sold narcotics with Smith and others.

48. For example, on or about February 20, 2021, Smith called Lane. During that conversation, Smith and Lane had the following exchange:

Lane: But I still got, I still got all these whats-a-names man, ain't nobody biting.

Smith: How many of them you got?

Lane: Huh?

Smith: How many of them you got? Like 4?

Lane: Nah I got 2, 4, 6, I got, I got 8 because I got, I got 7UP⁴ too.

Smith: Yeah, that ain't about nothing man. That shit ain't about nothing. When you see people just throw a couple here, throw a couple there. Shit, I still got a lot of them shits. I'ma get rid of them though, that shit ain't about nothing.

Lane: Yeah.

Smith: Alright, watch ya ass out there.

Lane: Alright.

Based on my experience and training, and knowledge of the investigation, Smith and Lane were discussing how much heroin Smith had left and how drug sales were slow.

Baxter's Role in DTO-3

49. Controlled purchases, surveillance, and other investigative techniques have revealed that Baxter sold narcotics for DTO-3.

50. For example, on or about March 3, 2021, Smith contacted Covington. During that conversation, Smith and Covington had the following exchange:

Smith: You still need to do that Uncle Nach?

⁴ "7UP" is a stamp used by DTO-3, which was purchased multiple times during controlled buys by the CS.

Covington: Yeah.

Smith: What time you be ready?

Covington: I'm waiting on him.

Smith: Alright, I'm a just go get it together just in case I leave the area. I'm a just have my father whenever you ready.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Smith and Covington were discussing a narcotics transaction for later that evening, and Smith was planning to send his father—Baxter—to conduct the transaction.

51. Additionally, Baxter participated in a controlled purchase with the CS in January 2021. On the day of the controlled purchase, the CS contacted Covington and placed an order to purchase eight “bricks”⁵ of heroin. Covington then exchanged numerous communications with Smith—his known heroin and fentanyl supplier—where they discussed the timing of a narcotics sale to the CS later that day. During one of these calls, which occurred during the week of January 17, 2021, and which was intercepted by law enforcement, Smith told Covington that he had to do something and “my pops give it to you.” Subsequently, Covington picked up a plastic bag containing suspected heroin and fentanyl from Baxter—who is Smith’s father. Covington then handed the CS the plastic bag, which contained approximately eight bricks of suspected heroin and fentanyl. The controlled purchase was recorded by video and audio.

52. Physical surveillance conducted throughout the course of this investigation also confirms Baxter’s role in DTO-3. Law enforcement frequently observed Baxter conducting hand-to-hand narcotics transactions outside of the Fairmount Residence, including on or about January 29, 2021 and on or about March 9, 2021, among multiple other dates.

⁵ A “brick” of heroin commonly refers to approximately 50 single-dose packets, or glassine envelopes, of heroin.