

ALSD Local 91 (Rev. 5/18) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Alabama

United States of America
v.
KAREN SOLOMON LANGSTON

Case No. 18-mj-74

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 30, 2017 - May 1, 2017 in the county of Dallas in the
Southern District of Alabama, the defendant(s) violated:

Code Section

Offense Description


Title 21 USC 841 (a)(1)

Possession with intent to distribute a Controlled Substance

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

TFO William Givens, DEA

Printed name and title

Sworn to before me and attestation acknowledged pursuant to Fed. R. Crim. P. 4.1.

Date: June 19, 2018

Judge's signature

City and state: Mobile, AL

P, Bradley Murray, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT**

I, William (Billy) Givens, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

I make this affidavit in support of an application for an arrest warrant for **Karen Solomon LANGSTON** for violations of Title 21 United State Code, Section 841(a)(1).

I am a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), and have been since 2012. Prior to my assignment as a TFO with DEA, I was a Detective with the Mobile Sheriff's Department, in Mobile, Alabama for approximately eight years. I have received extensive training during my career in law enforcement narcotics investigations. I am familiar with the ways in which drug traffickers conduct their business, including, but not limited to, their methods of obtaining and distributing controlled substances, to include pharmaceutical controlled substances.

The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Based on the facts set forth in this affidavit, there is probable cause to believe that two violations of 21 USC 841(a)(1) have been committed by **Karen Solomon LANGSTON**.

In 2017, Mobile County Sheriff's Office Narcotics Detectives made several controlled buys in Mobile of controlled substances from several targets, one of whom cooperated with law enforcement after her arrest. The cooperating source (CS) identified her primary source of supply for pills as **Karen Solomon LANGSTON** of Selma, Alabama. The CS provided detailed information on the number of times and the amounts of pills, to include Morphine and Hydrocodone, she had purchased from **LANGSTON** and agreed to make controlled purchases of controlled substances from **LANGSTON**. The CS also identified a doctor in Selma as the doctor who prescribed **LANGSTON** opiates on a monthly basis, which **LANGSTON** sold so she could purchase methamphetamine for her personal use. On March 31, 2017, the CS called **LANGSTON** and then met with **LANGSTON** and purchased sixty-six prescription Morphine pills from **LANGSTON** in Selma, for \$1,910.00. Prior to the purchase on March 30, 2017, the CS had placed a recorded call to **LANGSTON**. The CS and **LANGSTON** agreed to meet at **LANGSTON's** trailer in Selma, on March 31, 2017. The CS had been provided \$2,200.00 in Official Advance Funds and electronic recording equipment before the March 31 controlled buy.

The CS purchased 46 (200 mg) Morphine tablets for \$35.00 apiece and 20 (60 mg) Morphine pills for \$15.00 apiece, for a total of \$1,910.00 from **LANGSTON** at her trailer in Selma. The CS's purchase was audio and video recorded.

The Alabama PDMP shows **LANGSTON** received three different strengths of Morphine on April 28, 2017 from prescriptions the Selma doctor wrote her.

On May 01, 2017, the CS called and later met with **LANGSTON**, under the direction and control of DEA agents, and purchased 35 Morphine pills and 26 Hydrocodone pills for \$1,400.00 from **LANGSTON** in Selma. On April 28, 2017, the CS had texted **LANGSTON**. The CS and **LANGSTON** agreed to meet at **LANGSTON's** trailer in Selma on May 01, 2017, for the CS to purchase Morphine pills from **LANGSTON**.

During the April 28, 2017, conversation, **LANGSTON** threatened to sell the pills to an unknown individual, who was already in Selma, for more money than the CS had discussed paying **LANGSTON**. The CS offered to pay **LANGSTON** two dollars more per pill if she would wait for the CS to arrive on Monday, May 01, 2017 in Selma. **LANGSTON** agreed. The original agreement was fifty 200 mg Morphine and thirty 60 mg Morphine pills for a total of \$2,360.00. On Monday, May 01, 2017, DEA Agents and TFOs met the CS at a location in Selma to brief the CS and prepare

the CS for the controlled buy. The CS told TFO Givens that prior to the CS's arrival **LANGSTON** changed the pill count to less than what had been discussed earlier.

The CS was then given \$1,600.00 in Official Advance Funds and electronic recording equipment was initialized. The CS left the meeting location followed by surveillance units.

The CS arrived at **LANGSTON's** trailer, as witnessed by Agents. While at the trailer, the conversation between the two could be overheard, via the Kel. It appeared **LANGSTON** could not recall the conversation she and the CS had prior to the CS's arrival. **LANGSTON** attempted to sell the CS fewer pills for more money than they had discussed. The CS could be heard disagreeing with **LANGSTON**. The CS told **LANGSTON** that one of the pills **LANGSTON** was trying to sell to the CS was Hydrocodone and that the CS was not paying the agreed price for cheaper pills. **LANGSTON** became agitated and was ready to sell to other people who had arrived at her trailer. The CS then took the purchased pills containing twenty six 10mg Hydrocodone, seventeen 200mg Morphine and eighteen 60mg Morphine pills and left the location at approximately 1:05 p.m. This transaction was audio and video recorded.

The Alabama PDMP shows **LANGSTON** received three different strengths of Morphine on April 28, 2017 from prescriptions the Selma doctor wrote her.

Morphine and Hydrocodone are Controlled Substances.

Respectfully submitted,



William Givens, Task Force Officer
Drug Enforcement Administration

THE ABOVE AGENT HAS ATTESTED
TO THIS AFFIDAVIT PURSUANT TO
FED. R. CRIM. P. 4.1(b)(2)(B) THIS 18th
DAY OF JUNE 2018

P. BRADLEY MURRAY
UNITED STATES MAGISTRATE JUDGE