

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

Joel Edward PORTER

Case No.

3:18-mj-103

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 2017 through March 21, 2018 in the county of Richland and Lexington in theDistrict of South Carolina, the defendant(s) violated:*Code Section*

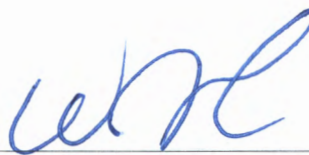
21 U.S.C. §§ 841(a)(1), 846

Offense Description

Conspiracy to knowingly, intentionally, and unlawfully manufacture and possess with intent to distribute, and to distribute Fentanyl, a Schedule II controlled substance

This criminal complaint is based on these facts:

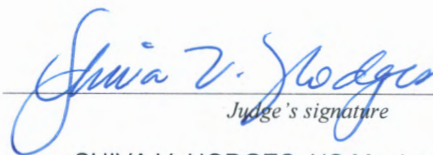
See attached affidavit

☒ Continued on the attached sheet.*Complainant's signature*

William Cobia, Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/07/2018City and state: Columbia, SC*Judge's signature*

SHIVA V. HODGES, US Magistrate Judge

Printed name and title

risk law enforcement operations. I have also received training through the RCSD for clandestine laboratory operations as well as a certification as a hazardous materials technician. In 2016, I attended the DEA Task Force Officer School where I received training in conducting DEA Federal Investigations. During that same year, I also attended the DEA Tactical Diversion Basic School, where I received specialized training in DEA Diversion related investigations. In April of 2017, I attended the DEA Basic Asset Forfeiture class where I received training in conducting financial investigations to identify assets associated with drug trafficking. In June of 2017, I attended a Money Laundering Seminar hosted by the DEA where I received training in recognizing money laundering, especially as it pertains to drug trafficking organizations. During my tenure as a drug investigator, I have frequently utilized the services of informants and other confidential sources of information. I have written and submitted affidavits in support of state and federal level search warrants and other court-ordered investigative techniques. I have also been involved in investigations whereby electronic tracking devices (ETD) were installed and monitored. I am familiar with the terminology and distribution methods used by drug traffickers, as well as the methods of packaging and transporting numerous types of controlled substances. I have received training, both formal and informal, in the investigation of violations of controlled substance offenses. The Attorney General has empowered me with Title 21 Authority under the United States Code, which authorizes seizures and arrests for violations of the Controlled Substance Act. I have been involved in numerous investigations that have resulted in arrests and seizures of controlled substances. During this investigation, I have conducted surveillance, acquired or assisted in the acquisition of drug and non-drug exhibits, debriefed a cooperating source utilized in this investigation, subpoenaed records, reviewed subpoenaed records and reviewed public records.

1. As a DEA TFO, I have participated in investigations involving narcotics and money laundering violations. Through these investigations and the training above, I have become familiar with the investigative methods and techniques regarding drug trafficking and money laundering. Additionally, I have participated in, and been the affiant for,

search and arrest warrants, and have identified and seized narcotics and narcotics proceeds during the execution of said search warrants. I am familiar with the methods of operation and terminology used by drug traffickers as well as methods of laundering drug proceeds. I have also previously applied for orders to intercept secure communications and have participated in investigations involving the use of wire and electronic communication interceptions. I am familiar with the methods of operation and terminology, including the use of telephones, by drug traffickers as well as methods of laundering drug proceeds. While involved in narcotics trafficking investigations, I have also communicated extensively with other federal, state and local law enforcement personnel who specialize or have expertise in this area.

2. This Affidavit is made in support of the filing of a Criminal Complaint and request for the issuance of an Arrest Warrant for Joel Edward PORTER (hereinafter referred to as PORTER), Christopher Wayne CARRAWAY (hereinafter referred to as Chris CARRAWAY) and Liderrick Rodriquez GOMEZ (hereinafter referred to as GOMEZ) for the offense of conspiracy to knowingly, intentionally, and unlawfully manufacture and possess with intent to distribute, and to distribute Fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C). Additionally, I am seeking an Arrest Warrant for Chris CARRAWAY and GOMEZ for possessing a firearm in relation to or in furtherance of a drug trafficking crime in violation of Title 18, United States Code, Section 924(c)(1)(a).

INFORMATIONAL SOURCES

3. The information contained in this affidavit is based on my personal knowledge of this investigation, information relayed to me by other law enforcement and civilian personnel, cooperating source interviews, interviews of a source of information, subpoena returns, electronic and physical surveillance, and undercover controlled purchases. Additionally, the facts related in this affidavit do not reflect all the information known to me or other

law enforcement personnel, but instead are intended to supply information sufficient to show probable cause for arrest warrants for the listed individuals.

PROBABLE CAUSE

4. The source of my information and the grounds for my assertions are as follows:
 - a. Since October 2016, the RCSD and the DEA's South Carolina TDS (TDS) have been conducting an investigation into PORTER as a distributor of pharmaceutical controlled substances, to include Percocet, OxyContin, oxycodone, and Xanax (alprazolam) tablets in the Columbia and Lexington areas of South Carolina.
 - b. In October 2016, a confidential source (hereafter referred to as CS) working for the RCSD provided information to Investigator Zachary Brunson in reference to a white male being involved in the distribution of Xanax (a scheduled IV controlled substance). The CS provided Inv. Brunson with telephone number (803) 354-6988 as the telephone number for the white male. Inv. Brunson conducted a search of an open source database that linked the telephone number to an individual named Joel PORTER.¹
 - c. During the same month, RCSD Investigator Brad Maxwell received information from a source of information (SOI) in reference to an individual named Chris CARRAWAY who was involved in the distribution of illegal narcotics. The SOI informed Inv. Maxwell that he/she believed Chris CARRAWAY lived somewhere in the area of the Whole Foods located at 702 Cross Hill Road, Columbia, South Carolina. Inv. Maxwell conducted a social media search of Chris CARRAWAY and learned Chris CARRAWAY was possibly dating a female named Sabrina MCKEOWN.² The SOI also stated Chris

¹ Since this search, agents with the DEA TDS have subpoenaed the telephone records and subscriber information associated with telephone number (803) 354-6988. The records indicated the telephone number is assigned to Susan PORTER at 6458 Dare Circle, Columbia, South Carolina.

² At this point in the investigation, agents learned CARRAWAY was possibly dating Sabrina McKeown. According to South Carolina Department of Motor Vehicle records Sabrina MCKEOWN, has a 2016 Kia Soul, SC license plate

CARRAWAY drove a silver hatchback style vehicle, possibly a Scion. A search of a law enforcement database by Inv. Maxwell revealed that Sabrina CARRAWAY was possibly residing at 4621 Oxford Road, Columbia, South Carolina.³

- d. On October 11, 2017, Inv. Maxwell and other agents with the RCSD Narcotics Unit conducted surveillance in the area of 4621 Oxford Road, Columbia, South Carolina. Inv. Maxwell observed a white male subject outside the residence, later identified as Chris CARRAWAY, and a silver Kia Soul, bearing South Carolina license plate HRX445 parked in the driveway of the location. Inv. Maxwell observed Chris CARRAWAY enter into the silver Kia Soul and depart the location. Inv. Maxwell eventually observed Chris CARRAWAY drive to 2321 Holland Street, West Columbia, South Carolina. Inv. Maxwell observed CARRAWAY meet with another white male, later identified as PORTER, who was driving a black Mercedes sedan. Inv. Maxwell then observed Chris CARRAWAY depart the location in the silver Kia Soul. Subsequently, RCSD Deputy David Farr conducted a traffic stop on the silver Kia Soul for a traffic violation. After making contact with Chris CARRAWAY and Sabrina CARRAWAY in the vehicle, Deputy Farr detected the odor of marijuana and observed a small amount of suspected marijuana on Chris CARRAWAY's shirt. As a result, Chris CARRAWAY and Sabrina CARRAWAY were detained and a subsequent search of the vehicle was conducted. As a result of the search, Deputy Farr recovered approximately 3.5 grams of suspected heroin and a Glock handgun from inside the vehicle.⁴ Chris CARRAWAY was placed under arrest and transported to RCSD HQ. Sabrina CARRAWAY agreed to cooperate with the investigation and provide an interview to investigators; she was also transported to RCSD HQ. During the post Miranda interview with investigators, Chris CARRAWAY stated he was periodically staying with Sabrina CARRAWAY at 4621 Oxford Road. Chris

HRX445, registered in her name. According to the SCDMV records, Sabrina MCKEOWN listed 317 Byron Road, Apartment 3, Columbia, South Carolina on her driver's license and vehicle registration. As the investigation progressed, agents learned, through SCDMV records, that Sabrina MCKEOWN changed her last name to CARRAWAY on her driver's license and vehicle registration on January 10, 2018. Sabrina CARRAWAY also changed her address with the SCDMV to 4621 Oxford Road, Columbia, South Carolina. For the purpose of this affidavit, Sabrina MCKEOWN will be referred to as Sabrina CARRAWAY.

³ The residence of 4621 Oxford Road, Columbia, South Carolina is approximately one mile from the Whole Foods located at 702 Cross Hill Road, Columbia, South Carolina.

⁴ A search of the National Crime Information Center (NCIC) records revealed the Glock handgun was reported stolen from Lexington County's jurisdiction. The suspected heroin was submitted to the RCSD evidence room for analysis and safekeeping and the substance tested positive for heroin and cyclopropyl fentanyl.

CARRAWAY also admitted that there were currently Xanax/alprazolam tablets and approximately four (4) handguns at the residence. Investigators then obtained written consent from Sabrina CARRAWAY to search the residence. Subsequently, investigators seized an amount of suspected Xanax/alprazolam tablets, suspected Adderall/amphetamine salts tablets, and five (5) handguns from inside the residence. Chris CARRAWAY was arrested on state level charges of possession with intent to distribute (PWID) heroin, PWID schedule II controlled substance (Adderall/amphetamine salts), PWID schedule IV controlled substance (Xanax/alprazolam), and unlawful carry of a pistol.⁵

- e. On November 6, 2017, the CS contacted PORTER via telephone number (803) 354-6988 and referred PORTER to an undercover deputy (hereafter referred to as UC1) working for the RCSD. UC1 contacted PORTER via telephone number (803) 354-6988 and PORTER agreed to sell a quantity of tablets to the UC1 and informed the UC1 to meet him (PORTER) at the Wal-Mart located on Bush River Road. UC1 drove to the Sunoco gas station located at 1203 Bush River Road, Columbia, South Carolina and contacted PORTER via telephone number (803) 354-6988 and asked PORTER to meet him/her (UC1) at the Sunoco gas station, and PORTER agreed.⁶ Subsequently, PORTER met with UC1 at the location and conducted the transaction with UC1. Following the transaction, Inv. Brunson met with UC1 at a pre-determined location and UC1 provided Inv. Brunson with five circular tablets bearing “RP” on one side and “10/325” on the other side. These tablets matched the description of Percocet or oxycodone/acetaminophen 10/325mg tablets (a scheduled II controlled substance).⁷ The tablets were submitted to the RCSD evidence room for analysis and safekeeping. The

⁵ The suspected heroin, suspected Xanax/alprazolam tablets, and suspected Adderall/amphetamine salts tablets were submitted to the RCSD evidence room for analysis and safekeeping. The tablets were tested by the RCSD drug lab and the suspected Xanax/alprazolam tablets tested positive for Etizolam (not a controlled substance) and the suspected Adderall/amphetamine salts tablets tested positive for methadone (a scheduled II controlled substance). The RCSD drug lab also tested the suspected heroin and the substance tested positive for heroin and cyclopropyl fentanyl (a scheduled I controlled substance).

⁶ The UC1 requested PORTER to meet him/her at the Sunoco gas station located at 1203 Bush River Road because this location is within the jurisdiction of Richland County. The Wal-Mart and Murphy’s gas station located across the street from the Sunoco is located in Lexington County.

⁷ Percocet is the brand name of an opioid pain medication that contains an oxycodone and acetaminophen mixture as the active ingredients. These tablets are sometimes referred to as “Percs” on the street. This medication is scheduled II controlled substances.

results of the analysis are still pending. The UC1 purchased the tablets with \$30.00 pre-recorded money provided by Inv. Brunson. The transaction was also captured on audio and video.

- f. Following the transaction with PORTER on November 6, 2017, Inv. Brunson utilized UC1 on two other occasions to purchase pharmaceutical controlled substances from PORTER. After each transaction, the tablets purchased by the UC1 were submitted to the Richland County Sheriff's Department evidence room for analysis and safekeeping. The lab results of the tablets are still pending. All of the transactions were captured on audio and video.
- g. On November 15, 2017, UC1 communicated with Joel PORTER, who was utilizing telephone number (803) 354-6988, and arranged a subsequent purchase of thirty (30) Oxycodone pills from PORTER on November 16, 2017. On November 16, 2017, UC1 had additional correspondence with PORTER and arranged to meet him (PORTER) at the Walmart, 5420 Forest Drive, Columbia, SC at 11:30 am. At approximately 11:20 am, agents met with UC1 at a predetermined location and I provided UC1 with \$630.00 in DEA Officially Advanced Funds (OAF), as witnessed by Special Agent Barry Wilson. Subsequently, UC1 drove to the Wal-Mart parking lot, followed by agents, and met with PORTER. At approximately 11:39 am, I observed PORTER exit his vehicle and get into the front passenger seat of UC1's vehicle. A short time later, PORTER exited the front passenger seat of UC1's vehicle and I observed him (PORTER) return to the driver's seat of his (PORTER) vehicle. Subsequently, both PORTER and UC1 departed the area and UC1 was followed by agents to a pre-determined location. Upon arrival, UC1 provided me with a small plastic bag containing multiple light blue tablets stamped "A215" on one side.⁸ This transaction was captured on audio and video.⁹

⁸ PORTER purported to UC1 that there were thirty-five (35) tablets in the plastic bag. Due to safety concerns related to fentanyl, the agents did not count the pills. I did submit the tablets to the RCSD evidence room for analysis and safekeeping. Subsequently, the tablets were analyzed by the RCSD drug lab and the tablets tested positive for fentanyl. Although these tablets tested positive for fentanyl, I am referring to these tablets in this affidavit as 30mg oxycodone tablets because these tablets were made to represent such. For the purpose of the remainder of this affidavit, I will refer to the tablets as counterfeit oxycodone tablets.

h. Following the transaction on November 16, 2017, agents utilized two undercover (UC1 and UC2) to conduct seven other controlled purchases of counterfeit oxycodone tablets from PORTER between November 27, 2017 and March 19, 2018.¹⁰ Through the controlled purchases, agents utilized physical surveillance, telephone records, electronic tracking devices (ETD), and other investigative techniques to identify PORTER's source of supply for the counterfeit oxycodone tablets.¹¹ Subsequently, on November 15, 2017, agents utilized an ETD installed on PORTER's vehicle to conduct physical surveillance on PORTER. At approximately 7:22 pm, TFO Jamey Jones observed PORTER's vehicle stop at the McDonald's restaurant located at 4801 Garners Ferry Road. At approximately 7:32 pm, I observed the vehicle depart the McDonald's parking lot. A short time later, SA Norris Macon observed the vehicle stop in front of a residence on Oxford Road. A short time later, SA Macon observed the vehicle depart the area. Agents utilized electronic and physical surveillance to follow PORTER's vehicle to the Cook Out Restaurant located at 1101 Harden Street, Columbia, South Carolina. At approximately 7:46 pm, TFO Cobia observed the vehicle parked in the parking lot behind the restaurant. At approximately 7:57 pm, TFO Jones observed PORTER reposition his vehicle to a parking space on Senate Street. At approximately 7:59 pm, I observed a white male, later identified as CARRAWAY, exit the front passenger seat of PORTER's vehicle and enter into the front passenger seat of a black Chevrolet Camaro. A short time later, I observed CARRAWAY exit the front passenger seat of the black Chevrolet Camaro and enter into the front passenger seat of PORTER's vehicle. Subsequently, both vehicles departed the area. As the black Chevrolet Camaro departed, I observed the vehicle was bearing South Carolina license plate NUQ317. A review of South Carolina Department of Motor Vehicles (SCDMV) records revealed that the vehicle is a 2015 Chevrolet Camaro registered to

⁹ Prior to this transaction, RCSD Investigators were directly funding the controlled purchases between UC1 and PORTER. The transaction on November 16, 2017 was the first transaction directly funded and investigated by DEA TDS.

¹⁰ All of the tablets purchased from PORTER during the above timeframe were submitted to the RCSD evidence room for analysis and safekeeping. Agents have received analysis on seven of the eight submissions and all of the tablets tested at this point have tested positive for fentanyl. The final analysis is still pending.

¹¹ On November 14, 2017, RCSD Investigator Zachary Brunson presented a state tracking order to Fifth Circuit Judge Robert Hood allowing law enforcement agents to install an ETD on PORTER's vehicle. Subsequently, on November 15, 2017, agents installed an ETD on PORTER's vehicle.

Robert E. McMurray at 1654 Ogden Road, Rock Hill, South Carolina. An additional owner was listed as Liderrick Rodriguez GOMEZ. Based on my training and experience in narcotics investigations, I believe CARRAWAY met with GOMEZ at this location to purchase counterfeit oxycodone tablets from GOMEZ.

- i. On December 30, 2017, at approximately 9:08 pm, UC-1 received an SMS text message from 803-354-6988 (PORTER's telephone) which read, "You gonna need any more blues soon?"¹² Following this SMS text message, UC-1 replied to PORTER indicating he/she was currently out of town, but informed PORTER he/she would contact him (PORTER) when he/she (UC1) returned to town. Subsequently, on January 4, 2018, at approximately 1:13 pm, UC-1 sent a SMS message to PORTER that read, "Should be back round 5ish U still good." Following this SMS text message, UC-1 arranged to purchase 100 counterfeit oxycodone tablets from PORTER. At approximately 4:17 pm, UC-1 received an SMS text message from PORTER that read, "You sure you want a 100." At approximately 4:18 pm, UC-1 sent an SMS text message to PORTER that read, "Yea." UC-1 received a follow up response from PORTER that read, "Ok I texted him Waiting on a response but it should be a go." A review of toll records for PORTER's telephone revealed that at 4:18 pm, PORTER sent an SMS text message to telephone number (803) 862-6593, a telephone believed to be used by Chris CARRAWAY. I believe, through professional training and experience, as well as knowledge of this investigation that UC-1 advised PORTER that he/she would be back around 5 pm that afternoon and asked if PORTER still had pills available. PORTER only had 30 at the time, but offered to sell those and obtain UC-1's requested 100 pills later that evening. I further believe that PORTER contacted CARRAWAY in order to obtain the requested pills.
- j. On January 4, 2018 at approximately 6:26 pm, UC-1 called PORTER who was using telephone number (803) 354-6988. After the two exchanged greetings, UC-1 asked PORTER, "Did he hit you back yet?" PORTER responded, "Nah, he hadn't hit me up yet." PORTER later added, "My guess is that it could be 2 to 3 hours, he's slow."

¹² Based on training and experience, I know that the term "blues" is a street term used to describe 30mg oxycodone tablets. During this investigation, PORTER repeatedly used this same term when referring to counterfeit oxycodone tablets.

PORTER assured UC-1 that he would get in touch with UC-1 as soon as he had them. PORTER then explained, "He has to drive up to Rock Hill and get them." UC-1 asked, "He has to drive up there tonight?" PORTER responded, "Oh, I don't know about tonight. I know when he gets the new batch in he has to." UC-1 asked PORTER to contact UC-1 as UC-1 had "all the cash and stuff." PORTER advised the CS, "Yeah, yeah. I promise." The two concluded the call soon after. I believe, through professional training and experience, as well as knowledge of this investigation that PORTER advised UC-1 that he had not yet met with the supplier to obtain the pills. PORTER further explained that the supplier had to drive to Rock Hill to pick up his supply of pills.

- k. On January 4, 2018, at approximately 8:25 pm, UC-1 called PORTER who was using telephone number (803) 354-6988. UC-1 contacted PORTER to clarify the meet time. PORTER explained, "That's when I'm going to meet him to pick them up at 8:45." UC-1 asked PORTER if he wanted to meet again at the Walmart. PORTER responded, "Yeah, we can keep it the same cause I got to pick them up right up the road." The two agreed to talk again after PORTER had the pills. I believe, through professional training and experience, as well as knowledge of this investigation that that PORTER clarified he would meet the supplier at 8:45, not UC-1 at that time. PORTER intended to meet with the supplier nearby the Walmart. At approximately 8:49 pm, the PORTER sent an SMS text message to CARRAWAY's telephone, (803) 862-6593.
- l. At approximately 9:05 pm, UC-1 texted the PORTER and asked, "U got them" At approximately 9:07 pm, UC-1 received an SMS text message from PORTER that read, "No I'm still waiting on him/He's slow." At approximately 9:12 pm, UC-1 received an SMS text message from PORTER that read, "He said he will be 15 more minutes/I'm one exit up" UC-1 responded to PORTER, "Aight cool." At approximately 9:13 pm, UC-1 received from PORTER a screen shot of a text conversation between PORTER and an individual stored in the PORTER's contacts as "Chris." The text string read as follows:

PORTER: What time man

CHRIS: 845

PORTER: Ok

The text conversation continued:

PORTER: You want me to head over/I need a 112 blues/?/Are you ready/I got zz I got a 100 jug righ now cannot wait or she gonna leave

CHRIS: Go to the Hamptons now an I'll be like 15 minutes wait for my call

I believe, through professional training and experience, as well as knowledge of this investigation that UC-1 contacted PORTER to find out the status of the transaction. PORTER had still not met with the supplier and explained that the supplier was slow. I believe PORTER subsequently sent UC-1 a screen shot of a conversation he was having with his supplier, "Chris," in order to prove to UC-1 that it was his supplier holding up the deal and not PORTER. In this text string, I believe "Chris" directed PORTER to go to the Hampton Hills Condominiums and he would call in 15 minutes. Based on previous surveillance, I know that PORTER generally drives to these Condominium apartments prior to meeting with the supplier, believed to be Chris CARRAWAY. I reviewed the toll activity for PORTER's telephone and noted that at 9:08 PORTER sent an SMS text message to (803) 862-6593, the phone used by Chris CARRAWAY and at 9:11pm PORTER received an SMS text message from (803) 862-6593, used by Chris CARRAWAY. Subsequently, at approximately 9:52 pm, UC-1 met with PORTER at the Wal-Mart on Forest Drive and purchased 100 counterfeit oxycodone tablets for \$1500.00 official funds.

- m. On March 20, 2018, United States Magistrate Judge Paige J. Gossett signed a federal search warrant allowing agents to search Chris CARRAWAY's residence located at 4621 Oxford Road, Columbia, South Carolina. Subsequently, on March 21, 2018, agents with the DEA TDS, RCSD, City of Columbia Police Department, and Lexington County Sheriff's Department executed the federal search warrant at Chris CARRAWAY's residence. Agents also arrested PORTER on state level warrants for distribution of a scheduled II controlled substance. Agents also arrested Chris CARRAWAY on state level

warrants for distribution of heroin.¹³ At approximately 3:45 pm, agents observed PORTER arrive at Chris CARRAWAY's residence. A short time later, the RCSD Special Response Team executed the search warrant resulting in the arrest of PORTER and Chris CARRAWAY.

- n. Subsequently to Chris CARRAWAY's arrest, agents transported Chris CARRAWAY to the DEA Columbia District Office for interviewing and processing. At approximately 4:45 pm, I, as witnessed by RCSD Inv. Maxwell, read Chris CARRAWAY his Miranda Rights verbatim from a DEA issued Miranda card. After hearing his rights, Chris CARRAWAY agreed to speak with agents and answers questions. Chris CARRAWAY informed agents that he (CARRAWAY) met PORTER while attending Dreher High School in Columbia, South Carolina. Chris CARRAWAY stated in the past 1-2 years he (CARRAWAY) began purchasing heroin and Xanax/alprazolam tablets from PORTER, and during the same time period PORTER began to purchase counterfeit oxycodone tablets from him (CARRAWAY). Chris CARRAWAY admitted the counterfeit oxycodone tablets were clandestinely manufactured and produced to look like or represent oxycodone/Roxicodone tablets. Chris CARRAWAY stated he (CARRAWAY) purchased the counterfeit oxycodone tablets from an individual from the Rock Hill area of South Carolina. Chris CARRAWAY stated he (CARRAWAY) did not know the individual's name, but he (CARRAWAY) referred to the individual as Germ's cousin. Chris CARRAWAY also stated he knows the individual as "Dreak."¹⁴ I then showed Chris CARRAWAY a photograph obtained from the South Carolina Department of Motor Vehicles of Liderrick Rodriquez GOMEZ. Chris CARRAWAY identified the individual as GOMEZ and his (CARRAWAY) supplier of counterfeit oxycodone tablets. Chris CARRAWAY informed agents that he (CARRAWAY) met GOMEZ around the same time he (CARRAWAY) was arrested by RCSD in October of 2017. Chris CARRAWAY stated around this time GOMEZ began to "front" Chris CARRAWAY 300

¹³ These warrants were a result of RCSD Inv. Maxwell's previous investigation of Chris CARRAWAY. During the investigation, Chris CARRAWAY was facilitating the distribution of heroin between an RCSD UC and another individual.

¹⁴ Based on my training and experience, I know it is common for drug traffickers to use fake names, nicknames, or "street names" in order to help conceal their identity from law enforcement.

counterfeit oxycodone tablets per week.¹⁵ Chris CARRAWAY stated GOMEZ would collect the money from each shipment when the two would meet for Chris CARRAWAY to be re-supplied with more tablets. Chris CARRAWAY stated GOMEZ charged him (CARRAWAY) \$6.00 per tablet. Chris CARRAWAY stated the shipments eventually increased from 300 tablets to 500 tablets.

- o. On March 27, 2018, SA Barry Wilson and other agents pursuant to a proffer agreement issued by the United States Attorney's Office interviewed Chris CARRAWAY.¹⁶ During the interview, Chris CARRAWAY showed SA Wilson an SMS text message from GOMEZ, using telephone number (803) 448-4010 that read, "Yo how much can you have for me in the morning I gotta send some bread off I got more for you."¹⁷ This message was received by CARRAWAY on March 23, 2018 at approximately 9:24 pm. On March 25, 2018, CARRAWAY sent a response to GOMEZ that stated, "Yo I'm in Virginia my bad...we flew up here, prolly my gma last weekend here, after surgery we'll know, but regardless we shold be headed back tomorrow evening..." At approximately 1:00 pm, GOMEZ replied, "I'm good now but you good and sorry bout that bro and that's a bet." CARRAWAY replied, "Yeah man this got my whole fam fucked." GOMEZ then replied, "Yea I already know how that be." On March 27, 2018, at approximately 4:10 am, CARRAWAY sent a reply to GOMEZ, "Yo just waking up again, we headed back down there this am bro." SA Wilson asked CARRAWAY to explain these messages. CARRAWAY explained that GOMEZ began a correspondence with him regarding CARRAWAY paying the \$4,000 back to him. CARRAWAY then gave an excuse to GOMEZ regarding a family situation in order to stall paying GOMEZ back. SA Wilson asked CARRAWAY if he would be able to contact GOMEZ and

¹⁵ Based on my training and experience, I know the term "front" is a street term used to describe providing one drugs on consignment.

¹⁶ CARRAWAY's statements made under proffer are intended only to support probable cause for the arrest of GOMEZ. Pursuant to the terms of the proffer agreement, they are not intended to be used against him for the issuance of an arrest warrant.

¹⁷ Chris CARRAWAY informed agents that he (CARRAWAY) still owed GOMEZ \$4000.00 from a previous shipment of counterfeit oxycodone tablets. Based on my training and experience, I believe that in this message GOMEZ is asking Chris CARRAWAY when he can pay off his drug debt. GOMEZ also informs Chris CARRAWAY that he (GOMEZ) has more counterfeit oxycodone tablets.

arrange a transaction with him for additional counterfeit oxycodone pills. CARRAWAY stated that he could and agreed to do so.

- p. At approximately 5:39 pm, SA Wilson asked CARRAWAY to make further contact with GOMEZ. Therefore, CARRAWAY texted GOMEZ, "Yo you gettn these yet." GOMEZ responded, "Yea I got that one," meaning that GOMEZ had counterfeit oxycodone tablets available. During the course of the evening, the two continued a text exchange from CARRAWAY's phone to GOMEZ's setting up a meeting that evening so that CARRAWAY could repay the debt and obtain additional counterfeit oxycodone tablets. The two agreed to meet at the Hampton Hills Condominiums, 4600 Fort Jackson Blvd., Columbia, SC. CARRAWAY received an SMS message from GOMEZ stating that GOMEZ only had "400" of the counterfeit oxycodone tablets with him at that time. At the agents' direction, CARRAWAY agreed to go ahead and meet with GOMEZ.
- q. Agents established surveillance at the Hampton Hills Condominiums and at approximately 6:50 pm, GOMEZ arrived in his black Mercedes Benz. Instead of CARRAWAY meeting with GOMEZ, agents decided to have two marked RCSD Units drive up and approach GOMEZ's vehicle as a routine suspicious vehicle check. In doing so, Deputy Phillip Darnell observed GOMEZ moving and reaching inside the vehicle. When Deputy Darnell made contact with GOMEZ, he also smelled the odor of marijuana about the vehicle. Deputy Darnell subsequently asked GOMEZ if there were any weapons in the vehicle and GOMEZ advised there was a gun in the glove compartment. GOMEZ then reached toward the open glove box, at which time Deputy Darnell observed a pistol in plain view in the glove compartment. Subsequently, GOMEZ was removed from the vehicle and detained. Deputies subsequently located a plastic bag containing approximately 400 blue tablets concealed in GOMEZ' groin area. GOMEZ was arrested for possession with intent to distribute (PWID) a scheduled II controlled substance and transported to the RCSD HQ.
- r. Following GOMEZ's arrest, I met with RCSD Deputy Phillip Darnell at the RCSD Headquarters in order to conduct a Post Miranda interview of GOMEZ. Prior to

the interview, Deputy Darnell showed me an RCSD evidence bag containing a clear plastic bag containing multiple blue tablets that appeared to be oxycodone tablets. Deputy Darnell stated that GOMEZ had previously been verbally advised of his (GOMEZ) Miranda rights and informed (post-Miranda) Deputy Darnell that the blue tablets contained fentanyl¹⁸. I then asked GOMEZ if the tablets were oxycodone tablets or if the tablets contained fentanyl. GOMEZ stated the tablets did contain fentanyl. At approximately 9:00 pm, I reviewed an RCSD Miranda/Advice of Rights form with GOMEZ. Prior to reviewing the form with GOMEZ, I asked GOMEZ if he could read and write and GOMEZ stated yes. GOMEZ then signed the Miranda/Advice of Rights form and agreed to answer questions from investigators.

- s. TFO Cobia began the interview by asking GOMEZ what led to his (GOMEZ) arrest. GOMEZ stated he was approached by RCSD Deputies while sitting in his vehicle in the parking lot of the Hampton Hills Condominiums. GOMEZ stated he was waiting for a friend in the parking lot to retrieve a game system from his friend. GOMEZ would not provide the name of the person he was planning to meet in the parking lot.
- t. TFO Cobia questioned GOMEZ in reference to the source of the narcotics. GOMEZ stated he obtained the tablets from an individual in Rock Hill, South Carolina, but GOMEZ refused to provide a name for this individual. GOMEZ stated there were approximately 400 tablets in the bag that was seized by deputies. GOMEZ explained he (GOMEZ) originally purchased 500 tablets from his source in Rock Hill for \$1.00 per tablet, but he had already sold 100 tablets to another individual in Rock Hill.

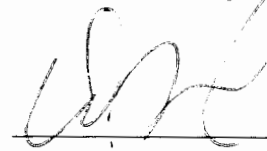
¹⁸ Lawful fentanyl is a Schedule II controlled substance used for anesthesia and or pain management. This type of fentanyl is generally prescribed in 12mcg/h, 25mcg/h, 50mcg/h, 75mcg/h, and 100mcg/h. Fentanyl usually is made in three different applications: Transdermal (patch), Sublingual (dissolving strip), and Transmucosal (nasal spray). Legitimate use of Fentanyl is used for break through pain, chronic pain, and anesthesia. However, fentanyl as referenced in this affidavit pertains to powder form of fentanyl analogues, which are generally a Schedule I controlled substance. I know through training and current drug trends, that the powder form is being produced in clandestine settings throughout Asia, specifically China. This powder allows local drug dealers to mass produce counterfeit oxycodone tablets using fentanyl to simulate the oxycodone narcotic effect. This form of fentanyl is linked to overdose deaths in the United States and is very dangerous. Street slang nomenclature includes “fent,” “fenty,” “dragons breath,” and “China girl.”

GOMEZ refused to provide the name of this individual. TFO Cobia then asked GOMEZ how he knew the tablets contained fentanyl. GOMEZ then changed his story and stated he was not positive if the tablets contained fentanyl, but stated he knew that the tablets could possibly contain fentanyl. GOMEZ appeared reluctant to provide complete and accurate information during the interview. As agents further questioned him, GOMEZ requested an attorney and concluded the interview. GOMEZ was released on bond related to the RCSD arrest the following day.

CONCLUSION

Based upon the facts detailed above, your affiant respectfully requests the issuance of a criminal complaint and arrest warrants for Joel Edward PORTER, Christopher Wayne CARRAWAY, and Liderrick Rodriquez GOMEZ.

This affidavit has been reviewed by Assistant United States Attorney Ben Garner.

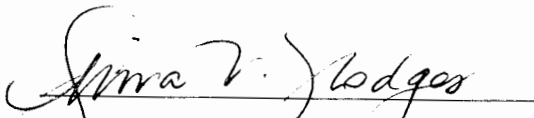


William Cobia

Task Force Officer

Drug Enforcement Administration

SWORN to and subscribed before me this 7th day of June 2018.



THE HONORABLE SHIVA V. HODGES

United States Magistrate Judge

District of South Carolina