

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CASE NUMBER:
UNDER SEAL

JOHNNY HERNDON,
also known as "Goo,"
CHRISTOPHER HARRIS,
JONATHAN GREEN,
also known as "Whiteboy" and
"Whitey,"
FABIAN REDMOND,
also known as "Mook,"
JONATHAN O'LEARY,
also known as "JB,"
ANTWAION EDWARDS,
also known as "Fee,"
MARCUS LONGSTREET,
also known as "Chico,"
MANUEL MEEKS,
also known as "Big Shorty,"
CAUIRENCE HERNDON,
also known as "C" and G,"
DESHAWN RICHARDSON,
also known as "Shawn," "Little Lord,"
and "D,"
ANDREW JONES,
also known as "Crowbar,"
PATRICIA NEAL,
EDUARDO ZAMUDIO,
also known as "Lalo"
ROBERT RUSSELL,
also known as "Hurk,"
ROBERT SMITH,
also known as "Bo,"
DARRYL JONES,
also known as "Heavy,"
MILDRED SMITH,
HARRY SMITH,
KESHAW EUELL, and
DARVEN MARION

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CRIMINAL COMPLAINT

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

Count One

Beginning no later than in or about 2013, and continuing until the present, at Chicago, in the Northern District of Illinois, the following Individuals did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and to distribute controlled substances, namely, 280 grams or more of mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846:

JOHNNY HERNDON, also known as (“aka”) “Goo,”
CHRISTOPHER HARRIS,
JONATHAN GREEN, aka “Whiteboy” and “Whitey,”
FABIAN REDMOND, aka “Mook,”
JONATHAN O’LEARY, aka “JB,”
ANTWAION EDWARDS, aka “Fee,”
MARCUS LONGSTREET, aka “Chico,”
MANUEL MEEKS, aka “Big Shorty,”
CAUIRENCE HERNDON, aka “C” and “G,”
DeSHAWN RICHARDSON, aka “Shawn,” “Lord,” and “D,”
ANDREW JONES, aka “Crowbar,” and
PATRICIA NEAL (NEAL).

Count Two

On or about June 7, 2014, CHRISTOPHER HARRIS, at Chicago, in the Northern District of Illinois, Eastern Division, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded silver Rossi, Amadeo & Co. .357 caliber revolver bearing serial number F063110, which firearm had traveled in interstate commerce prior to defendant’s possession of the firearm, in violation of Title 18, United States Code, Section 922(g)(1).

Count Three

On or about April 16, 2014, JOHNNY HERNDON, at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixtures and substances containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Four

On or about May 7, 2014, EDUARDO ZAMUDIO, aka “Lalo,” at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixtures and substances containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Five

On or about July 24, 2014, ROBERT RUSSELL, aka “Hurk,” at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Six

On or about May 1, 2014, ROBERT SMITH, aka “Bo,” at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 28 grams or more of a mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Seven

On or about May 1, 2014, DARRYL JONES, aka “Heavy,” at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, 28 grams or more of a mixtures and substances containing cocaine

base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Eight

On or about May 1, 2014, MILDRED SMITH, at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute controlled substances, namely, a quantity of mixtures and substances containing cocaine base and a quantity of mixtures and substances containing cocaine, Schedule II Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1).

Count Nine

On or about April 26, 2014, HARRY SMITH, at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Ten

On or about April 28, 2014, KESHAW EUELL, at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of a mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Eleven

On or about July 22, 2014, DARVEN MARION, at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, a quantity of a mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

GRAHAM R. GRAFTON
Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Sworn to before me and signed in my presence.

Date: August 6, 2014_____

Judge's signature

City and state: Chicago, Illinois

Michael T. Mason, U.S. Magistrate Judge

Printed name and Title

NORTHERN DISTRICT)
)
OF ILLINOIS)

AFFIDAVIT

I, Graham R. Grafton, Special Agent of the Bureau of Alcohol Tobacco, Firearms, and Explosives (“ATF”), having been duly sworn under oath, state as follows:

I. PRELIMINARY MATTERS

1. I am a Special Agent with the ATF. I have been so employed since December 2012. As part of my regular duties as a Special Agent, I investigate criminal violations of the federal firearms laws, including Title 18, United States Code, Sections 922 and 924, as well as federal narcotics laws, including Title 21, United States Code, Sections 841(a)(1) and 846. I have received training regarding, among other things, violations of federal firearms and narcotics laws at the Federal Law Enforcement Training Center and the Federal Bureau of Investigation’s Academy.

2. I have been a law enforcement officer for approximately 10 years, having previously been employed as a Special Agent with the Federal Bureau of Investigation from 2004 to 2006 and the Naval Criminal Investigative Service (“NCIS”) from 2006 to 2012. For the majority of my time in law enforcement, I have been assigned to various local, regional and federal task forces, including participation in multiple Organized Crime Drug Enforcement Task Force (“OCDETF”) operations, focused on the investigation of violent crimes and narcotics trafficking. I have been involved in various forms of electronic surveillance and the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage, and importation of controlled substances.

3. Based on my training and experience, I am familiar with the ways in which narcotics traffickers operate, including, but not limited to their: (a) methods of distributing narcotics; (b) use of telephone communication devices; and (c) use of code words to conduct their drug-related transactions. Further, I am aware that cellular telephones are an important method of communication utilized by drug dealers generally, and the participants in this criminal enterprise in particular.

4. This affidavit is made in support of a multi-count criminal complaint charging that –

a. Beginning no later than in or about 2013, and continuing until the present, at Chicago, in the Northern District of Illinois, the following Individuals did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and to distribute controlled substances, namely, 280 grams or more of mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846:

JOHNNY HERNDON, also known as (“aka”) “Goo” (HERNDON);
CHRISTOPHER HARRIS, (HARRIS);
JONATHAN GREEN, aka “Whiteboy” and “Whitey” (GREEN);
FABIAN REDMOND, aka “Mook” (REDMOND);
JONATHAN O’LEARY, aka “JB” (O’LEARY);
ANTWAION EDWARDS, aka “Fee” (EDWARDS);
MARCUS LONGSTREET, aka “Chico” (LONGSTREET);
MANUEL MEEKS, aka “Big Shorty” (MEEKS);
CAUIRENCE HERNDON, aka “C” and “G” (CAUIRENCE);
DeSHAWN RICHARDSON, aka “Shawn,” “Little Lord” and “D” (RICHARDSON);
ANDREW JONES, aka “Crowbar” (JONES); and
PATRICIA NEAL (NEAL).

b. On or about June 7, 2014, CHRISTOPHER HARRIS, at Chicago, in the Northern District of Illinois, Eastern Division, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded silver Rossi, Amadeo & Co. .357 caliber revolver bearing serial number F063110, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm, in violation of Title 18, United States Code, Section 922(g)(1).

c. On or about April 16, 2014, JOHNNY HERNDON, at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixtures and substances containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

d. On or about May 7, 2014, EDUARDO ZAMUDIO, aka "Lalo" (ZAMUDIO), at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixtures and substances containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

e. On or about July 24, 2014, ROBERT RUSSELL, aka "Hurk" (RUSSELL), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

f. On or about May 1, 2014, ROBERT SMITH, aka “Bo” (SMITH), at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 28 grams or more of a mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

g. On or about May 1, 2014, DARRYL JONES, aka “Heavy” (DARRYL), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, 28 grams or more of a mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

h. On or about May 1, 2014, MILDRED SMITH, at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute controlled substances, namely, a quantity of mixtures and substances containing cocaine base and a quantity of mixtures and substances containing cocaine, Schedule II Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1).

i. On or about April 26, 2014, HARRY SMITH (HARRY), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

j. On or about April 28, 2014, KESHAW EUELL (EUELL), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of a mixtures and substances containing

cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

k. On or about July 22, 2014, DARVEN MARION (MARION), at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, a quantity of a mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. The information in this Affidavit is obtained from physical surveillance; electronic surveillance, including court-authorized wiretaps of telephones used by members of these organizations and consensual audio and video recordings; controlled purchases and other seizures of drugs and firearms from organization members and customers; interviews of members of the organization, including some which followed their arrests for crimes related to drug distribution activity; interviews of cooperating sources; information received from other law enforcement agents and agencies, including criminal history information; phone and financial records obtained by subpoena or court order; laboratory analysis reports, my experience and training; and the experience of other agents.

6. This Affidavit is also made for the purpose of establishing probable cause in support of warrants to search the premises listed below (“Search Sites”), which are further described below and in the various Attachment A’s, and to seize evidence relating to the commission of offenses in violation of Title 21, United States Code, Sections 841(a), 843(b), and 846, and Title 18, United States Code, Sections 922(g)(1) and 924(c), as further described in the various Attachment B’s:

- SEARCH LOCATION A: 2758 West Adams Street, Chicago, Illinois (HARRIS's Residence Used As a Stash and Cook House);
- SEARCH LOCATION B: 4542 West Cermak Road, Chicago, Illinois (Car Wash Operated by ZAMUDIO used to sell and store narcotics);
- SEARCH LOCATION C: 4538 West Jackson Boulevard, Chicago, Illinois (HERNDON owns this building and obtained heroin from it to sell to a confidential multiple occasions and HERDON uses this as his primary residence);
- SEARCH LOCATION D: 4539 West Jackson Boulevard, Chicago, Illinois (HERNDON owns this building and sold heroin to a confidential source in it on multiple occasions);
- SEARCH LOCATION E: 716 South Kostner Avenue, Chicago, Illinois (HERNDON's residence used to store heroin);
- SEARCH LOCATION F: 5728 South Troy Avenue, Chicago, Illinois (ZAMUDIO's residence used to keep documents);
- SEARCH LOCATION G: 316 South Kilbourn Avenue, Chicago, Illinois (DTO Stash Spot Used to Serve Retail Customers);
- SEARCH LOCATION H: 547 North Lawler Avenue, Chicago, Illinois (RUSSELL's Residence); and
- SEARCH LOCATION I: 348 North Avers Avenue, Chicago, Illinois (MARION's Residence).

7. The recitation of facts contained in this Affidavit is not meant to be a complete narrative of all that has occurred in connection with this investigation, but is only a summary of

facts necessary to show probable cause to support the charges, search warrants, and seizure warrants as set forth herein.

II. BACKGROUND OF THE INVESTIGATION

8. This complaint is based on an investigation into the drug trafficking and related criminal activities involving HERNDON, HARRIS, SMITH, and their co-conspirators. Since approximately late 2012, the Chicago Police Department (“CPD”) and ATF have been investigating a faction of the Gangster Disciples street gang on Chicago’s west side and its drug-trafficking operations. This faction of the Gangster Disciples, hereinafter referred to as the “HERNDON DTO,” is led by HERNDON, HARRIS, and SMITH and primarily operates in and around the 4500 block of West Jackson Boulevard in Chicago. This investigation has revealed that the HERNDON DTO operates “drug spots” or “open air drug markets,” operated in and around O’LEARY’s residence located at 316 South Kilbourn Avenue in Chicago and in and around an alley located near 4411 West Congress Avenue in Chicago. At this location, members of the DTO sell user quantities of crack cocaine to customers. It has also revealed that the DTO sells wholesale quantities of cocaine to other drug dealers and at various other locations.

9. The investigation has included the use of court-authorized interceptions of conversations over various cellular telephones used by HARRIS (Target Phones 1, 3, and 6), GREEN (Target Phone 2), SMITH (Target Phone 4), Individual One (Target Phones 5), and ZAMUDIO (Target Phone 7), and consensual audio and video recordings taken by undercover CPD officers and several cooperating sources. The intercepted and consensually-recorded conversations described throughout this Affidavit (collectively, the “recorded conversations”) have been summarized, and brackets have been placed around language that represent my or

other agents' and officers' understanding of what was being stated during the conversations, based on the content and context of the conversations, based on my knowledge of the investigation as a whole, prior and subsequent recorded calls, and my and other law enforcement officers' experience. In addition, language that is quoted from the recorded conversations throughout this Affidavit is based upon agents' and officers' review of the recorded conversations, and are not intended to be a final transcript of the audio recordings from which the quotes are taken. Moreover, the times listed for these calls are approximate. In most cases, voice identifications are based on names used during the intercepted conversations, voice recognition that has been accomplished to date by agents and officers, historical information developed during this investigation, telephone subscriber information, and comparison of some of the voices intercepted to voices intercepted during consensually recorded conversations, and/or surveillance by agents and officers. The summaries below do not include all potentially criminal calls intercepted during the period of interceptions, or all statements or topics covered during the recorded conversations.

10. This Affidavit is organized as follows: Section III sets out an overview of the HERNDON drug trafficking organization and describes the roles of the defendants within it; Section IV sets out a summary of the evidence in the investigation as it relates to each defendant; and Section V describes probable cause for the requested search warrants.

III. OVERVIEW OF THE HERNDON DTO

A. The Gangster Disciples Street Gang

11. Based on this investigation and my experience, and the experience of other law enforcement agents who specialize in gang investigations, I know the following.

12. The Gangster Disciples or “GDs” are a street gang that was formed on the south-side of Chicago in the late 1960s, by Larry Hoover, leader of the High Supreme Gangsters, and David Barksdale, leader of the Black Disciples. The two groups united to form the Gangster Disciples. After Larry Hoover’s federal conviction and accompanying life sentence in 1995, the Gangster Disciples splintered into several factions, each of which control the drug trade in certain areas of the south and west sides of Chicago as well as approximately 35 other states.

B. The Herndon DTO

1. The Leader: JOHNNY HERNDON

13. The Herndon DTO is a faction of the GDs that operates in the two square blocks surrounding the 4500 block of West Jackson Boulevard on the west side of Chicago. HERNDON is the patriarch of the DTO and is related to several members of the DTO, including HARRIS, who is his nephew. HERNDON has been selling crack, heroin, and other narcotics in this area since the early 1990s. HERNDON supplies HARRIS and the DTO members with crack cocaine, which he obtains from a source in powder form and converts to crack cocaine.

14. As discussed below in Section IV.5 (page 133), HERNDON’s main source of profit comes from selling heroin, which has higher margins.

15. According to public records and subpoenaed real estate records, since 1993, HERNDON has purchased at least 31 properties. Based on recorded statements made by HERNDON and his lack of legitimate income, it appears that HERNDON purchased these properties with drug proceeds, and proceeds from the sale of other appreciated properties that were originally purchased with drug proceeds that were then re-invested to purchase additional properties. Available records reveal that HERNDON has spent over \$1 million purchasing

properties and they now have a conservative estimated value of over \$1.6 million. All of the properties were purchased outright, with no mortgage. In addition, many of the properties have been rehabbed by HERNDON, likely with other drug proceeds. Many of the properties are multi-unit rental properties and some are Section 8 subsidized rental units. According to bank records, these properties currently generate over \$20,000 per month in rental receipts for HERNDON.

2. The HERNDON DTO's Drug Spot Operations

16. As discussed below in Section IV.2 (page 24), HARRIS is the day-to-day operations leader of the DTO. He receives the crack from HERNDON. If HERNDON does not have the crack, HARRIS gets powder cocaine from other suppliers, including ZAMUDIO and RUSSELL, which HARRIS converts into crack cocaine. HARRIS stores the crack at his residence located at 2758 West Adams Street, where he repackages the crack into baggies containing individual user quantities. HARRIS then distributes the crack to the spot managers, including GREEN, REDMOND, O'LEARY, and EDWARDS.

17. The spot managers take turns running the drug spots located near 316 Kilbourn Avenue and 4411 West Congress Avenue. The spot managers distribute the crack cocaine to the spot workers, including LONGSTREET, MEEKS, CAUIRENCE, NEAL, RICHARDSON, and JONES, who in turn sell the crack directly to drug customers. After collecting the money for the crack cocaine, the spot workers take a portion of the profits as compensation, and give the rest of the money to the spot managers. After taking their cut, the spot managers then give the rest of the money to HARRIS. Spot managers are discussed below in Section IV.B.2 (page 25).

18. This drug territory is particularly lucrative due to the heavy traffic of drug customers and proximity to the highway. The HERNDON DTO uses violence, guns, and threats to control and protect this territory.

19. Each drug spot is run hierarchically. Certain workers are responsible for recruiting customers, others for distributing the crack cocaine, and others for collecting the money. The spot managers make sure the spots are run efficiently and are responsible for performing counter-surveillance to avoid detection by law enforcement.

20. The spot workers sell customers individually wrapped “rocks” of cocaine that each weigh approximately .25 grams. Based on the evidence unearthed by the investigation thus far, HARRIS supplies the spot manager with crack cocaine approximately three times each day, and each time gives the manager baggies containing 180 individually wrapped rocks; thus, the HERNDON DTO averages selling 540 rocks per day, or 135 grams of crack per day. Moreover, each rock costs a retail customer approximately \$10, meaning that the DTO makes \$5,400 on an average day selling crack cocaine. In a 30 day month, just the retail side of the DTO sells over 4 kilograms of crack cocaine and takes in approximately \$162,000 in revenue. Spot workers are discussed below in Section IV.B.3 (page 60).

3. The DTO’s Alternative Suppliers: ZAMUDIO, RUSSELL, and MARION

21. As further discussed below in Section IV.4.a (page 103), ZAMUDIO is a wholesale supplier of powder cocaine and heroin. When HARRIS is unable to obtain crack cocaine from HERNDON, he obtains powder cocaine from ZAMUDIO and converts it to crack cocaine at his residence located at 2758 West Adams Street. ZAMUDIO also sells wholesale

quantities of heroin to Individual One and others. ZAMUDIO stores and sells these narcotics out of a car wash located at 4542 West Cermak Road (**Search Location B**).

22. As further discussed below Section IV.4.b (page 123), ROBERT RUSSELL is another wholesaler supplier to HARRIS. If HERNDON and ZAMUDIO are out of cocaine, the investigation has shown that HARRIS gets supplied by RUSSELL, who stores the cocaine at his residence located at 547 North Lawler Avenue.

23. As further discussed below in Section IV.4.c (page 127), DARVEN MARION is another wholesaler supplier to SMITH. The investigation has shown that SMITH gets supplied by MARION, who stores the cocaine at his residence located at 348 North Avers Avenue.

4. Wholesale Customers

24. As discussed in Section IV.5 (page 133), the leaders of the HERNDON DTO also sell wholesale quantities of narcotics. HERNDON distributed wholesale quantities of heroin to CS-4 and others. HARRIS distributes wholesale quantities of crack to various GD members who control drug distribution spots in the blocks surrounding the area where the HERNDON DTO operates, including EUELL.

25. As discussed in Section IV.B.5.b (page 148), SMITH is HERNDON's lead wholesale distributor of crack. SMITH sells quantities of crack ranging from 63 grams to several hundred grams to various wholesale customers in Chicago and Indiana on behalf of HERNDON. These customers include DARRYL JONES, MILDRED SMITH, and HARRY SMITH.

IV. THE HERNDON DTO SELLS WHOLESALE QUANTITIES OF HEROIN AND CRACK COCAINE AND OPERATES TWO OPEN-AIR DRUG MARKETS ON THE WESTSIDE OF CHICAGO

26. As discussed in detail below, the investigation, which included extensive wire taps, use of confidential sources, surveillance and other investigative techniques, revealed that HERNDON is the leader of a DTO. He supplied crack cocaine to HARRIS, the DTO's daily operations managers. In turn, HARRIS supplied the crack to GREEN, REDMOND, O'LEARY and EDWARDS, who were the spot managers. The managers oversaw the spot workers, which included LONGSTREET, MEEKS, CAUIRENCE, RICHARDSON, JONES, and NEAL. In addition, SMITH assisted HERNDON in selling wholesale quantities of crack cocaine and heroin to wholesale drug dealers.

A. Historical Information Provided by Confidential Sources Concerning the HERNDON DTO

1. CS-1

27. CS-1 provided background information on HARRIS and MARION. CS-1 identified him/herself as gang member. According to CS-1, from approximately May 2011 through approximately February 2013, CS-1 purchased an average of nine ounces of cocaine from MARION each week, which he/she resold to his/her retail customers at a profit. According to CS-1, MARION told CS1 that MARION's narcotics supplier is HARRIS, and that HARRIS's supplier is HERNDON. CS-1 also reported that MARION was a member of the Black Soul street gang and was very close with HARRIS and HERNDON. CS-1 stated that MARION controls his own drug distribution spot on Avers Avenue.¹

¹ In the fall of 2012, officers from the CPD Gang Investigation Division arrested an individual (herein after "CS-1") for possession of approximately 100 grams of cocaine. CS-1 began cooperating with law enforcement in hopes of receiving charging and/or sentencing consideration in connection with this arrest.

28. On May 7, 2013, CS-1 conducted a controlled purchase of 68.5 grams of crack cocaine from MARION and HARRIS. Agents are no longer working with CS-1 because, in May 2014, agents intercepted a call between CS-1 and SMITH, during which CS-1 arranged to purchase 63 grams of crack from SMITH; CS-1 was not authorized to make this purchase by law enforcement.

2. CS-2

29. CS-2 provided background information on HERNDON's history of narcotics activity. CS-2 identified him/herself as gang member. CS-2 reported he/she has known HERNDON for over 20 years. CS-2 reported he/she has purchased cocaine in quantities ranging from an ounce to multiple kilogram quantities from HERNDON and HARRIS over a period of several years prior to 2010. CS-2 identified HERNDON and HARRIS as ranking members of the Gangster Disciples. Since 2010, CS-2 has reported that he/she no longer affiliates directly with the Gangster Disciples and therefore has lost his/her ability to obtain kilogram quantities of narcotics or learn directly about gang-related activity. CS-2 reported that HARRIS supplied members of the Gangster Disciples and other street gangs with crack and powder cocaine and heroin, in quantities from half an ounce to kilograms.²

However, no promises have been made to CS-1 regarding the ultimate resolution of that charge, and CS-1 has yet to be indicted related to that arrest. In addition to this arrest, CS-1 has one additional narcotics conviction from 1996. To date, CS-1 has been provided \$600 for subsistence during the time he/she has cooperated with law enforcement in this investigation. Agents believe that CS-1 has provided reliable information concerning his/her knowledge of HARRIS and the HERNDON DTO's distribution of narcotics. Much of the information provided by CS-1 has been independently corroborated by physical surveillance, telephone records, pen register data, and the controlled purchases of narcotics.

² In the Fall of 2009, officers from the CPD met with an individual who stated that he/she had information concerning the Gangster Disciples' narcotic and gang activity on the West and South Side of Chicago (hereinafter, "CS-2"). CS-2 began cooperating with law enforcement in the hopes of becoming a paid informant for CPD. CS-2 provided the CPD with verifiable information on the Gangster Disciples. CS-2

30. CS-2 stated that based on his/her previous involvement in the gang, he/she learned from HERNDON that HARRIS is supplied by and works under HERNDON and is HERNDON's second in command and responsible for overseeing two drug spots run by the HERNDON DTO. According to CS-2, HARRIS is also responsible for supplying wholesale quantities of narcotics to neighboring gangs that control the drug spots abutting the 4500 block of West Jackson Boulevard. CS-2 reported that he/she observed HARRIS with a gun on or near him on several occasions.

31. CS-2 reported that SMITH is also trusted member of HERNDON's operation and also distributes cocaine for HERNDON.

32. CS-2 has told law enforcement that GREEN is HERNDON's son who is also a member of the Gangster Disciples. CS-2 reported that GREEN worked in conjunction with HARRIS to run the HERNDON DTO's drug spots. CS-2 also reported that he/she has seen GREEN in possession of a gun. CS-2 also stated that, based on CS-2's former association with the gang, he/she knows GREEN to act as an "enforcer" and chief of security for the open-air drug markets operated by the HERNDON DTO.

was then registered as an informant with the CPD. Since the fall of 2009, CS-2 has provided CPD with information on the activities of the Gangster Disciples on the south and west sides of Chicago. In early December 2013, CS-2 was arrested on charges of possession of a less than a gram of heroin. CS-2 continued cooperating with law enforcement in the hopes of receiving charging and/or sentencing consideration in connection with this arrest. However, no promises have been made to CS-2 regarding the ultimate resolution of that charge, but CS-2 has yet to be indicted related to that arrest. From 1990 through 2012, CS-2 has been convicted of three narcotics-related offenses and one weapons offense. To date, CS-2 has been provided \$5,700 for subsistence during the time he/she has cooperated with law enforcement in this investigation. Agents believe that CS-2 has provided reliable information concerning HARRIS's and HERNDON's distribution of crack cocaine. Much of the information provided by CS-2 has been independently corroborated by physical surveillance, telephone records, pen register data, and the controlled purchases of narcotics.

3. CS-3

33. CS-3 provided background information on the daily operations of the drug spots. CS-3 identified himself/herself as a drug user who has routinely purchased heroin and crack cocaine from an open-air drug market located in the vicinity of Kilbourn Avenue and Jackson Boulevard in Chicago, throughout the duration of 2013. CS-3 reported that GREEN is responsible for running one of the HERNDON DTO's drug spots. According to CS-3, the individuals that sell drugs to customers in the two drug spots discussed above include CAUIRENCE, JONES, and RICHARDSON. As part of this investigation, CS-3 conducted five controlled purchases of crack cocaine from GREEN and GREEN's associates at one of the DTO's drug spots.³

4. CS-4

34. CS-4 provided background information on HERNDON's history of narcotics activity. CS-4 identified himself/herself as a gang member. According to CS-4, he/she met HERNDON in approximately 2001 or 2002. CS-4 knows HERNDON as "John" or "Big Goo." CS-4 stated HERNDON is a high ranking member of the Gangster Disciples street gang from the area of Jackson and Kolmar Avenues in Chicago. According to CS-4, HERNDON is in direct

³ In the summer of 2012, officers from the CPD Gang Investigation Division arrested an individual on charges relating to his/her possession of cocaine (hereinafter, "CS-3"). CS-3 began cooperating with law enforcement in the hopes of receiving charging and/or sentencing consideration in connection with the pending charge. However, no promises have been made to CS-3 regarding the ultimate resolution of that charge. In addition to this arrest, from 1992 through 2009, CS-3 has seven convictions for burglary and narcotics-related offenses. To date CS-3 has been provided \$2,700 for subsistence during the time he/she has cooperated with law enforcement in this investigation. Agents believe that CS-3 has provided reliable information concerning GREEN's distribution of crack cocaine. Much of the information provided by CS-3 has been independently corroborated by physical surveillance, telephone records, pen register data, and the controlled purchases of narcotics. Agents are no longer working with CS-3 because he was arrested for armed robbery in May 2014.

control of all the cocaine being sold on the entire west side of Chicago. CS-4 stated that approximately five years ago, he/she was provided with approximately forty pounds of marijuana by HERNDON from a house located on Kostner Avenue just south of the I-290 expressway. CS-4 stated he sold the marijuana for a thousand dollars a pound on behalf of HERNDON and gave HERNDON seventy percent of the profits. CS-4 stated he/she asked for two to three ounces of crack cocaine from HERNDON approximately five times in the past several years, which CS-4 resold for a profit.⁴

35. CS-4 reported that HERNDON owns numerous properties throughout the Chicago and in Gary, Indiana. CS-4 recounted that he/she had seen HERNDON in possession of a check for \$1.5 million after HERNDON sold a sixty unit building located in the area of Michigan Avenue and 47th street in Chicago several years ago. CS-4 reported HERNDON currently lives in a three story building which has been converted to a single family home on the 4500 block of Jackson Boulevard in Chicago. CS-4 stated that HERNDON traveled to auto auctions and purchased vehicles, which he stored on a lot located on the corner of Kolmar and Jackson and also on his property located on Harrison Avenue and also on some of his property located in the vicinity of Congress Parkway and Kolmar. CS-4 stated he/she has known

⁴ In late March 2014, agents developed a new confidential source (“CS-4”). CS-4 has periodically provided information to the Chicago Police Department for approximately the last ten years. CS-4 has four previous convictions for narcotics-related offenses and assault. CS-4’s information has been deemed reliable by the CPD in that it has been independently corroborated by CPD officers through other investigative means, such as wire interceptions and controlled purchases of narcotics. CS-4 is cooperating with law enforcement in exchange for payment. To date, CS-4 has received approximately \$7,700 for his/her assistance in this investigation.

HERNDON to travel with large amounts of United States currency in plastic bags in the trunk of whatever vehicle he is driving.

B. The Drug Spots

1. HERNDON Supplies HARRIS And The DTO With Crack Cocaine For Sale On The Spots (Count One)

a. HERNDON's Own Comments

36. As demonstrated by the below described calls and recorded conversations, HERNDON controls the source of supply of crack cocaine distributed by members of his organization. As HERNDON described to CS-4, during a recorded meeting on April 2, 2014, HERNDON played college basketball but after being cut in the NBA draft, he “went back home and started selling some drugs.” In a later recorded conversation, on April 8, 2014, HERNDON told CS-4, “I’ve been doing this shit for 25 years.”⁵

37. Further HERNDON told CS-4, in a recorded conversation on April 11, 2014, that he preferred to sell heroin and only sold cocaine in order to supply HARRIS and other members of the DTO. During the meeting, CS-4 stated, “I wanna sit down and talk to you too man.” HERNDON replied, “Bout what, the D [heroin].” CS-4 replied, “Yeah.” HERNDON stated, “Okay, yeah, I got the D [heroin], that’s what I work with, I got the C [cocaine] too, but you don’t make no money on. . .” CS-4 interrupted and asked, “That shit high?” HERNDON replied,

⁵ HERNDON was identified as follows: (1) as discussed below, CS-4 conducted several controlled purchases of heroin from HERNDON. These purchases were captured on a video recording device. Agents compared HERNDON’s image as captured on this device was compared to known mug shots of HERNDON, and concluded that the heroin purveyor was, in fact HERNDON; (2) surveillance observed these transactions taking place at buildings owned by HERNDON; and (3) CS-4 confirmed that the seller was HERNDON. Agents confirmed that HERNDON was the user of Herndon Phone 1 by comparing the voice of the user of that phone to HERNDON’s voice as captured by CS-4’s recording devices during the controlled purchases of heroin.

“Look here man you used to pay twenty-two [\$22,000] for a key [kilogram of cocaine] now they charging to you thirty-five [\$35,000].” HERNDON continued, “Listen now, with all the niggas money [HERNDON DTO workers’ salaries], that margin [with all of the money that HERNDON has to pay his workers, he doesn’t make much margin, or profit].” HERNDON stated, “If you wanna sell a whole key it ain’t worth it . . . you got to get a G to get some money out of it...a G fo’ sho’ [HERNDON is saying that one must charge at least \$1,000 per ounce in order to make any profit from the sale].” HERNDON explained, “I don’t like fucking with it [cocaine as compared to heroin], but I gotta get. I keep my little nephews [HARRIS and other members of the DTO] and them gang banging and shit with it, they have to have something to work with [HERNDON arranges for HARRIS and the DTO to be supplied with cocaine].”

b. The “Drought”

38. Other evidence shows that HERNDON is the main supplier to the DTO. For example, from approximately late May 2014 until July 4, 2014, the HERNDON DTO was out of cocaine. The “drought” was evidence by several texts messages and calls.

39. For example, on May 21, 2014, at approximately 11:26 a.m. (Call #38718), HARRIS, who was using Target Phone 3, had a conversation with ROBERT SMITH, who was using telephone number (773) 322-7444 (“Target Phone 4”).⁶ During this conversation, SMITH

⁶ On September 26, 2013, SMITH provided Target Phone 4 to law enforcement as his point of contact during a traffic stop for a moving violation. SMITH also provided the nickname of “Bo,” during the contact. During the stop, SMITH told officers he was in the area in order to sell cars and fix homes with HERNDON. At the conclusion of the stop, officers reviewed pictures of SMITH from a law enforcement database and concluded the man they had spoken with, and who had identified himself to the officers, was SMITH. Further, as discussed below, SMITH told CS-4 his phone number was Target Phone 4. Agents compared the image of the man, who was called “Bo,” on that recording to known mug shots of SMITH and concluded the man to be SMITH. Further agents compared SMITH’s voice as captured on that video recording to the voice of the user of Target Phone 4 and concluded the user to be SMITH.

stated, “Yeah, shit you know what I be calling about, I’m trying to see if we going out to eat [if HARRIS had any cocaine]?” HARRIS replied, “Yeah, shit probably in a little while.” SMITH stated, “I’m out south. . .I’m sure hungry [SMITH wanted cocaine really badly].”

40. On May 28, 2014, at approximately 1:32 p.m. (Call #41946), HARRIS, who was using 312) 754-5176 (“Target Phone 3”), received an incoming text from EUCELL, who was using phone number (773) 747-9792. This text read, “I know you dead [out of cocaine] but I have 470 [dollars] for you [from selling crack cocaine].”

41. On May 30, 2014 at approximately 2:32 p.m. (call #6699), SMITH, who was using Target Phone 4, had a phone conversation with MARION, who was using MARION Phone 1. During this conversation, MARION asked, “No news [cocaine] yet?” SMITH replied, “Nothing.” MARION stated, “Man, that’s some bullshit.” SMITH replied, “It can’t be too much bullshit, ain’t nobody [got any cocaine].” MARION asks SMITH “Yeah”? SMITH replied, It ain’t no joke, I mean nobody.”

42. This drought corresponds to the time the HERNDON was not purchasing cocaine from his source because the price was too high or the quality was too low. For example, on May 16, 2014, during a recorded conversation, CS-4 asked HERNDON if he had any cocaine for sale. CS-4 asked HERNDON, “Hey, ah, hey, you a get mo butter [cocaine] yet? HERNDON stated, “the shit?” CS-4 replied, “Yeah, the C [cocaine].” HERNDON answered, “Man, I ain’t got no C.” CS-4 replied, “Damn.” HERNDON stated, “that shit, they [HERNDON’s suppliers] want too much and they want it hid, man who you think go for all that?” CS-4 replied, “Nah, ah hell naw. Hell, no.” HERNDON continued, “What they had did to hid it [packaged the cocaine in such a way to avoid detection by law enforcement], I had to work that...” CS-4 interrupted and

stated, "You had to cook that shit off." HERNDON continued, "...cook everything off and then pay 'em for what I get. They mad about it." Later, HERNDON stated, "Yeah, the Mexican ought to do this here...they want top dollar [HERNDON's supplier charges a lot of money for cocaine]." CS-4 stated, "Ah hell naw." HERNDON stated he would "stay on this D [heroin] stuff, man. Work with that till they straighten –do something-somebody do something."

43. Another example is, as further described below in paragraphs 415-419, on June 4, 2014, HERNDON sold CS-4 approximately 53 grams of heroin. During that meeting, HERNDON discussed his cocaine supplier as well. On June 4, 2014, CS-4 had a recorded meeting with HERNDON. During this meeting, CS-4 asked, "You ain't run across anymore of the, you ain't go get it did you [CS-4 inquired whether HERNDON had any cocaine for sale]?" HERNDON replied, "What the D [heroin]?" The CS-4 stated, "Nah, the C [cocaine]." HERNDON answered, "Ain't no C out here. I was just in there [pointing to PePe's Locksmith and Hardware] talking to that motherfucker [cocaine supplier] trying to get some, talking bout he got some sixty percent [sixty percent pure cocaine], I don't want that." HERNDON continued, "I went in the store that what I told, I thought about that motherfucker had it. He had C too, first he told me it was eighty percent [pure]. I don't want that. You know I don't want no sixty [percent pure]."

44. On June 10, 2014, at approximately 7:02 p.m. (call #8540), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using phone number (219) 881-8100. During this conversation, SMITH stated, "Ain't shit happening men, I swear nothing. Same old, same old. I asked Goo [HERNDON] has he heard from even and I said nigga, I said he called him, I guess he tryin' to get up soon [SMITH does not have

cocaine. He called HERNDON, and HERNDON told SMITH that he would be resupplied soon.” JONES responded, “It’s fucked up Bo [SMITH], I shit. I don’t even know what I’m gonna do, I ain’t never been so broke in my life.”

c. Co-Conspirators Talk About HERNDON Supplying the DTO

45. On May 1, 2014, at approximately 2:46 p.m., (Call #2317), SMITH, who was using Target Phone 4, had a conversation with MARION, who was using 773-469-7891 (“Marion Phone 1”). During this conversation, MARION stated, “I’m fucked up Joe. I ain’t got no money man. Man then you gotta go get some money. Where the fuck ima go get some money if I ain’t got none [crack cocaine] man? I told ya’ll [HERNDON and SMITH] I had dude money last night man.” SMITH replied, “Yeah, I hear you when you told him [HERNDON] that. MARION continued, “man, Joe uh...man I can’t do nothing. Mother fucker I’m...it’s a difference if I’m telling you that I’m going to fuck your money up. I’m telling you I’m going to bring your money right back man. How the fuck you gonna front every mother fucker [MARION was upset that HERNDON and SMITH were giving other individuals crack cocaine on credit but not him] in America but me?” SMITH replied, “Shit, he ain’t gave me nothing yet. They’re right there for these uh...they’re right there for these motherfuckers that’s coming [the crack cocaine was earmarked for a specific customer].” MARION asked, “You know what I’m saying? Now you trust your nephew to go get your money and bring it back [MARION is referring to the fact that HERNDON fronts HARRIS the crack cocaine to sell at the spot]. I’m like you now. Finny go on and get me some money man. Why give...get the fuck...get what I need and get on the fuck out of the way man.”

46. On May 1, 2014, at approximately 2:46 p.m., (Call #2317), SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation, MARION stated, "Yeah Bo." SMITH replied, "Yo. Yeah I was standing down there around him, that's why I said I'll holla back at you later but he gone now. Hey man like I told you [MARION], I know why it was (inaudible) man. Just like what he gave me for Heavy and his cousin that's coming but uh he ain't you know what I'm saying he ain't give me nothing. [HERNDON gave SMITH crack cocaine to sell to DARRYL JONES -- see below in paragraphs 337-345]. I say I ain't in no hurry man." MARION stated, "That be pissing me off now these same motherfuckers you know what I'm saying, when they people on they ain't no where around man. Me and you the motherfuckers that get rid of that shit (MARION is complaining that he and SMITH are the ones who actually sell the cocaine). You know what I'm saying?" SMITH had another call holding and so he and MARION hung up.

47. On May 1, 2014, at approximately 3:18 p.m., (Call #2326), SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation, SMITH stated, "And then that's what he gave and that's what he gave me today man I mean its soakin' wet [HERNDON cooked the powder cocaine into crack cocaine and it had not dried yet]." SMITH stated, "I don't give a fuck what they do with it [all of the people SMITH sold the crack cocaine to] they got a complaint ya'll complain to him [HERNDON]." SMITH continued, "Cause I keep on tellin' that you can't keep on getting' from these motherfuckers and then come up short and then think everybody else got to be short cause you short [HERNDON's suppliers "short" him, or sell him less cocaine than was agreed]." MARION agreed, "He [HERNDON] makes the same amount of money no matter what."

SMITH replied, "Hey I don't know what he makes but he claimin' that he don't want to jap and jack it up on nobody the price gonna be short and he, he well he cooked the first one and then he cooked that motherfucker cain' like about one fifteen or somethin' like that [115 grams of crack cocaine]." Later, SMITH stated, "Like dollar twenty five right, I'm like it's dry, I'm openin' in his safe right and check it soakin' wet [125 grams of crack cocaine, which was stored in HERNDON's safe]." SMITH continued, "And then when he fuck up now he got to take back if he cooked four of them motherfuckers like that now he got to take back the four of the motherfuckers with the with the bricks in it you know what I'm sayin? Now that now that's takin' away from every motherfuckin body when all you got to do is just half and half basically a half and half and shit uh however its uh gonna come out you know open the door well o this amount I'm gonna put this amount of gravel on top of it you know what I'm sayin' man? Bundle it up then then it's gonna be right but he don't do that he take all the gravel out flip the shake and then the shake come up short [SMITH is unhappy with the manner in which HERNDON converted the latest batch of cocaine into crack cocaine]."

48. On July 7, 2014, at approximately 7:10 p.m., (Call# 9845) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. MARION asked, "Where you all [HERNDON and SMITH] at?" SMITH replied, "Ah, Goo [HERNDON] just ah, he just, we just pulled up on Jackson." MARION asked, "he over there now?" SMITH replied, "Yeah." MARION stated, "Somebody had talked to him about some food [narcotics] and he didn't get it." SMITH asked, "What type of food, some diesel [heroin]?" MARION answered, "Yeah." SMITH replied, "Yeah, he got it." MARION confirmed, "He got it." SMITH clarified, "Yeah, the diesel [heroin] not the other one." MARION stated, "No, no,

the other one.” SMITH asked, “What the white folks [cocaine]?” SMITH continued, “Man, I’m telling you he didn’t get it man. What I gonna tell you a lie man?” MARION replied, “I know he didn’t get it. I want to know why he didn’t get it.” SMITH stated, “Oh, well you go to him and ask him that.” MARION replied, “I’m fittin’ to [MARION wants to know why HERNDON is selling heroin but will not supply the DTO with cocaine recently].”

2. HARRIS and the Spot Managers, GREEN, REDMOND, O’LEARY, and EDWARDS (Count One)

49. As discussed above and demonstrated below by the intercepted telephone calls, surveillance, seizures of crack cocaine, and seizures of guns, HARRIS is the recognized leader and street manager of the HERNDON DTO. He controls the sale of crack cocaine at 316 South Kilbourn Avenue in Chicago and in and around an alley located near 4411 West Congress Avenue in Chicago. HARRIS provides direction to the spot managers, who in turn provide daily oversight of the workers on the two drug spots. From the beginning of the conspiracy until approximately May 15, 2014, GREEN and REDMOND were the spot managers. They alternated days of managing the drug spots. For example, if GREEN was working Monday, REDMOND would work Tuesday, then GREEN would work on Wednesday and so forth. On approximately May 15, 2014, after he was arrested and had narcotics seized from him by police, REDMOND was demoted from spot manager to spot worker; in turn, O’LEARY was promoted from spot worker to spot manager. Starting in late June 2014, EDWARDS also became a spot manager.

50. During the course of the investigation and as discussed below, law enforcement obtained approximately 200 grams of powder cocaine, 744 grams of crack cocaine, 765 grams of heroin, and 252 grams of marijuana from the HERNDON DTO and its associates through

seizures and controlled purchases. Additionally, law enforcement seized thirteen guns from members of the DTO and its associates.

February 2014: HARRIS Resupplies the Spots With Crack Cocaine Through GREEN

51. On February 21, 2014, at approximately 11:40 a.m. (Call #4288), GREEN, who was using telephone number (312) 489-4668 (“Target Phone 2”),⁷ sent a text message to HARRIS, who was using number (312) 489-4668 (“Target Phone 1”).⁸ This message read, “on the last one [GREEN’s workers only had one more bag of crack cocaine to sell].”

52. On February 21, 2014, at approximately 11:43 a.m. (Call #4290), HARRIS, who was using Target Phone 1, sent a text message to GREEN, who was using Target Phone 2. This message read, “1750 wit short 1 [GREEN’s workers had sold \$1,750 worth of crack cocaine thus far].” GREEN replied, “Yep.” At approximately 4:56 p.m. (Call #4489), HARRIS, who was

⁷ On November 7, 2013, officers conducted a traffic stop on GREEN. During the stop, GREEN self-identified as GREEN. Also during the stop, officers called Target Phone 2 and observed GREEN look at the ringing phone and heard him state, “I never answer my phone unless I know who it is.” Additionally, on February 21, 2014, GREEN provided the number corresponding to Target Phone 2 to the Westmont Police Department as his phone number when he called them for assistance after locking himself out of his car. Further, agents compared the voice of the user of Target Phone 2 to GREEN’s voice as captured on the recordings made during undercover purchases of narcotics from GREEN, and determined GREEN to be the user of Target Phone 2 and Green Phone 2. Further, GREEN sold CS-3 crack cocaine on March 10, 2013. According to CS-3, during this transaction, GREEN told CS-3 to contact GREEN on Target Phone 2 if CS-3 wanted to purchase additional narcotics.

⁸ Agents identified HARRIS as follows: (1) as discussed herein, a confidential source made controlled purchases of crack cocaine from HARRIS on 8 separate occasions. These purchases were captured on an audio/video recording device. Agents compared HARRIS’s image as captured by those devices to known mug shots of HARRIS and concluded that the person on the video was, in fact, HARRIS; and (2) as discussed herein, HARRIS was arrested in possession of a gun on June 7, 2014. In his post-arrest interview, he self-identified as HARRIS. Agents identified HARRIS as the user of the phones ascribed to him herein, including Target Phones 1, 3, and 6, as follows: (1) as discussed herein, HARRIS used these phones to arrange meetings with various individuals, and surveillance observed HARRIS attend these meetings; (2) agents who interviewed HARRIS and also watched the video recordings of the controlled purchases of crack cocaine from HARRIS listened to the voice of the user of these phones and concluded it was HARRIS; and (3) HARRIS was arrested in possession of both Target Phone 1 and Target Phone 3.

using Target Phone 1, sent a text message to GREEN, who was using Target Phone 2. This message read, “what up.” GREEN replied, “Working the last 45 [GREEN was selling the last 45 rocks of crack cocaine].”

53. On February 23, 2014, at approximately 2:51 p.m. (Call #5230), HARRIS, who was using Target Phone 1, had a phone conversation with GREEN, who was using Target Phone 2. During this call, HARRIS stated, “Whitey [GREEN], they [the police] coming up Kilbourn [Avenue] from Congress [Avenue] and dude know him.” GREEN responded, “In that black Crown [GREEN had correctly described a surveillance vehicle].” HARRIS responded, “Yep.” GREEN stated, “Alright.” HARRIS stated, “Be right [careful] now.” GREEN responded, “I see him [the surveillance vehicle].”

54. On February 25, 2014, at approximately 3:10 p.m. (Call #6271), HARRIS, who was using Target Phone 1, had a conversation with GREEN, who was using Target Phone 2. During this call, GREEN asked, “What up unc?” HARRIS replied, “I was just seeing what’s up with you. You cool?” GREEN replied, “Yeah, I’m on the last of the shit [GREEN was almost out of his supply of narcotics]. These crowns just hitting us through this motherfucker [GREEN believed police were conducting surveillance on his location].” HARRIS replied, “Alright.”

55. On February 28, 2014, at approximately 11:01 a.m., HARRIS, who was using Target Phone 1 (Call #7171), had a conversation with GREEN, who was using Target Phone 2. During this call, HARRIS asked, “You said you were supposed to get some money from Big Shorty?” GREEN responded, “Yeah, he wasn’t done [selling narcotics] when I left last night and then he said Mook [REDMOND] told him to give it [the money] to him. But he still had ten [rocks of crack cocaine] when I left.” HARRIS asked, “Huh?” GREEN replied, “Yeah he still

had like ten [rocks of crack cocaine] when I left last night.” HARRIS stated, “He was talking about you gave him two-hundred [dollars] or some shit. That’s from other than what you had.” GREEN asked, “From other than what he had?” HARRIS replied, “Other than what you had, you had eleven [\$1,100]. And he said supposed to have got two-hundred [\$200] from Big Shorty or some shit or something.” GREEN stated, “I got two hundred from CAUIRENCE.” HARRIS replied, “Ah, to go with Mook’s [REDMOND] count right?” GREEN answered, “Yeah, to go with Mook’s shit.” HARRIS stated, “Right, that’s the deuce [\$200], right?” GREEN responded, “Yeah, I got the deuce from CAUIRENCE, not Big Shorty [Meeks]. That’s what I was talking about.” HARRIS replied, “Yeah, Big Shorty did owe a tre [\$300].” GREEN stated, “Big Shorty [MEEKS] got three and then that other deuce so go with that count so that’s right.” HARRIS replied, “Yeah, I had twelve [packages of crack cocaine] not eleven [packages].” HARRIS later stated, “So, I, well you take one off that twelve and your count. Give him that thirteen [one package of crack cocaine containing thirteen rocks of crack cocaine].” GREEN replied, “Okay, I’m waiting on his ass now, he say he went and took that car back. Yeah, I’m out here with Crowbar [JONES].” HARRIS stated, “Alright, yeah, you take that hundred and shit give him that thirteen.” GREEN replied, “Alright.”

February/March 2014: HARRIS Resupplies the Spots With Crack Cocaine Through REDMOND

56. On February 7, 2014, at approximately 7:25 p.m. (Call #42), HARRIS, who was using telephone Target Phone 1, had a phone conversation with REDMOND, who was using (708) 510-5170 (“Redmond Phone 1”)⁹. During this call, REDMOND stated, “Yo.” HARRIS

⁹ Agents determined that REDMOND was the user of Redmond Phone 1 because, during a field interview of REDMOND on February 8, 2014, during which he self-identified as REDMOND, officers called

replied, "What down?" REDMOND replied, "Shit, I'm on the last thirty [REDMOND only had thirty rocks of crack cocaine left to sell]." HARRIS then stated, "Alright."

57. On February 18, 2014, at approximately 9:52 p.m. (Call #2944), HARRIS, who was using Target Phone 1, had a phone conversation with REDMOND, who was using Redmond Phone 1. During this conversation, REDMOND stated, "Hey boss, you said, you said, nineteen [packages of crack cocaine]? I thought it was supposed to be seventeen?" HARRIS replied, "No, uh, why you didn't pick it up?" REDMOND then stated, "Aight, you should a got, I just get, I just got Big Shorty [MEEKS] and he owed me fo [four]. He only owed me fo [four]. CAUIRENCE already gave me the deuce [\$200], I owed you one [REDMOND was talking about his workers MEEKS and CAUIRENCE and how many packets of crack cocaine they each were responsible for selling that day]." REDMOND continued, "Right. Big Shorty [MEEKS] got fo [four]. I got, I got, fo [four]. I'm countin what I got in my pockets right now. I got fo [four], six, I got, I got the six. That's twelve. Then I got three thirties right here. On the fifteen. That's seven. I'm still coming up with seventeen. I'll recount. I got all the licks [packages of crack cocaine] you gave me." HARRIS then stated, "Right, the last time I gave you thirteen, I owed you one. I owed you a hundred on motherfuckin fourteen." REDMOND replied, "Right, I only owe you a hundred from off that. Now I gave, I gave CAUIRENCE his deuce [\$200]. I got a

Redmond Phone 1 and heard it ring while in the possession of REDMOND. The officers that conducted this interview compared REDMOND's voice during the interview to the voice of the user of Redmond Phone 1 and determined it to be REDMOND. The identification of REDMOND is based on the following: (1) REDMOND identified himself as REDMOND during this investigatory stop; (2) officers compared known mug shot photographs of REDMOND to the person they stopped and determined it to be REDMOND; and (3) CS-3 conducted a recorded controlled purchase of crack cocaine from REDMOND on February 19, 2014, and identified the person that he/she purchased the crack from as REDMOND after looking at mug shots of REDMOND.

pack over here. That's what, that's what I was counting. I gave him a thirty, see what I'm sayin' and I took a fifteen. I was only supposed to be a hundred short off that count, cause I, I still had a hundred out, but when I just gave you the count you said it was thirteen, supposed to be like fourteen. Right, for the fourteen you gave me the twelve, but the deuce from CAUIRENCE, with the deuce from CAUIRENCE made it fourteen, you only gave me twelve today, six thirty this morning. Only gave you thirteen, you gave me twelve, Big Shorty four, for sixteen, plus the one I owe you for seventeen [REDMOND concluded that HARRIS had only given him 17 packets of crack cocaine to sell, not 19].” HARRIS then stated, “Alright.”

58. On February 19, 2014, at approximately 8:39 a.m. (Call #3329) HARRIS, who using Target Phone 1, received a text from REDMOND, who was using Redmond Phone 1. This message read, “im out 30 n 15 [REDMOND's workers only have 45 rocks left to sell and REDMOND needs to be resupplied].”

59. On February 19, 2014, at approximately 11:18 a.m. (Call #3390) HARRIS, who using Target Phone 1, had a conversation with REDMOND, who was using Redmond Phone 1. During this conversation, REDMOND stated, “Right here on Gladys [REDMOND wanted HARRIS to supply him with crack cocaine near the spot on Gladys Avenue].” HARRIS replied, “Shit, why don't you just bring the car, come up to the carwash on Cermak [the car wash operated by ZAMUDIO located at 4542 West Cermak Avenue in Chicago (**Search Location B**)].” REDMOND stated, “Oh, alright.”

60. On February 19, 2014, at approximately 11:28 a.m., law enforcement officers performing surveillance (hereinafter “surveillance”) observed HARRIS standing in front of the

Car Wash. At approximately 11:29 a.m., surveillance observed REDMOND, driving a Kia Seoul, arrive at the Car Wash.

61. On February 22, 2014, at approximately 8:38 a.m. (Call #4736), REDMOND, who was using Redmond Phone 1, sent a text message to HARRIS, who was using Target Phone 1. This message read, “im out we cool I got up wit whitey [GREEN] count 13 [GREEN had \$1,300 in narcotics proceeds].” At approximately 11:52 a.m. (Call #4811), REDMOND, who was using Redmond Phone 1, sent a text message to HARRIS, who was using Target Phone 1. This message read, “last 15 [REDMOND was down to his last 15 rocks of crack cocaine to sell].” Shortly thereafter, at approximately 1:14 p.m., surveillance observed HARRIS at Donks auto body shop. At approximately 1:45 p.m., surveillance observed REDMOND counting a large amount of United States currency near 316 South Kilbourn Avenue.

62. On March 2, 2014, at approximately 3:33 p.m. (Call #8107), REDMOND, who was using Redmond Phone 1, sent a text message to HARRIS, who was using Target Phone 1. This message read, “last 30 n shorty [REDMOND’s workers had 30 rocks plus part of another bag (a shorty) of crack cocaine left to sell].” Later that day, at approximately 4:45 p.m. (Call #8129), REDMOND, who was using Redmond Phone 1, sent a text message to HARRIS, who was using Target Phone 1 (Call #8107). This message read, “im ready [REDMOND had sold all of the crack cocaine he had and needed HARRIS to resupply him].”

63. On March 3, 2014, at approximately 9:24 a.m. (Call #8216), HARRIS, who using Target Phone 1, received a text from REDMOND, who was using Redmond Phone 1. This text read, “i m ready [to drop off crack cocaine proceeds and pick up crack cocaine].”

64. On March 3, 2014, at approximately 11:05 a.m. (Call #8241), HARRIS, who using Target Phone 1, placed an outgoing call to REDMOND, who was using Redmond Phone 1. During this conversation, REDMOND stated, "I said shit, Squally [police] around this bitch a little bit, but other than that we all right. I said squally around this bitch a little bit, be careful. Other than that we all right, like two or three crowns, 2 unmarked [police cars]." HARRIS replied, "Where you at?" REDMOND stated, "Right here on Gladys." HARRIS replied, "Meet me at Homie and them shop [an automotive repair shop named Chi-Town Donk's located at 4727 W. Arthington Avenue]."

65. On March 3, 2014, at approximately 11:11 a.m. surveillance observed REDMOND and HARRIS meet on the 4700 block of West Arthington Avenue.

66. On March 3, 2014, at approximately 3:13 p.m., (Call #8340) HARRIS, who using Target Phone 1, placed an outgoing text to REDMOND, who Redmond Phone 1. This text read, "Shorty [HARRIS asked REDMOND if MEEKS paid him yet]." REDMOND replied via text, "he ain't give me shit."

67. On March 3, 2014, at approximately 4:36 p.m. (Call #8360) HARRIS, who using Target Phone 1, received a text from REDMOND, who was using Redmond Phone 1. This text read, "im ready [for more crack]." HARRIS replied via text, "Ok." At approximately 5:04 p.m., surveillance observed REDMOND and HARRIS meet in a liquor store parking lot on the corner of Laramie and Kinzie Avenues.

March 26, 2014: HARRIS Resupplies GREEN and Others With Crack Cocaine and Collects Narcotics Proceeds

68. On March 26, 2014, at approximately 7:52 a.m. (Call #35755), GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using Redmond Phone 1. During this conversation, REDMOND stated, "I'm working with the last two we got and CAUIRENCE still [REDMOND still has two packs of crack to sell and CAUIRENCE also has crack left to sell]." GREEN asked, "What you got left?" REDMOND replied, "Ain't shit but two thirties and I bust that down last night" [REDMOND had two large bags, each containing thirty rocks of cocaine, and he put those rocks into smaller bags]."

69. On March 26, 2014, at approximately 7:52 a.m. (Call #35759), GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using Redmond Phone 1. During this conversation, REDMOND stated, "What up all that?" GREEN replied, "Let's go man [GREEN is telling REDMOND to open up the narcotics market]." GREEN asked, "You out already [GREEN is asking if REDMOND and his workers are already selling drugs]?" REDMOND stated, "Yeah I'm over here on Kildare [Avenue], shit, I'm working with the last two we got. I say I said I'm workin on the last two we got and CAUIRENCE still. CAUIRENCE still owes a trey [\$300 for crack that was fronted to him]." GREEN then asked, "What you got left?" REDMOND replied, "Ain't shit but two thirties [REDMOND has two packages each containing approximately 30 rocks of crack cocaine for sale]. I'm going to finish my lick [finish selling this current supply of narcotics] to get my count [count the total proceeds from the narcotics sales]." Later GREEN stated, "Two thirties should take you till twelve o'clock and CAUIRENCE shit that shit gonna take you till twelve one o'clock Joe Sam going to be at work I

ain't gonna see none." REDMOND responded, "So I'm not posed to make no money G you posed to make some money and I ain't supposed to make shit?" GREEN asked, "Y'all didn't get none [drugs] when I was out there?" REDMOND responded, "On my kids I'm not laughing bro. I don't got no reason to lie to you. I didn't get shit till you called me yesterday and when you called me yesterday that's when I got my lick [narcotics]. I didn't get shit I didn't make no money. My rent needs to be done just like your bills need to paid. I can't keep giving you licks and I don't make shit, G, 'cause you don't give me that last one anyway." GREEN responded, "That's what I be doin' sometime I give you that dope and not be makin' a dime." REDMOND then stated, "You told to get the money from Chico [LONGSTREET] yesterday and Chico [LONGSTREET] told you took everything from him." GREEN responded, "On my mama that nigger gave me a saw buck boy a saw buck [\$100] hoes that takin' from you." REDMOND stated, "Well JB [O'LEARY] just stated you just came over there and took the whole fifty [five rocks of crack cocaine worth \$10 each] from him." GREEN then stated, "JB [O'LEARY] wasn't even done with the whole fifty." REDMOND then stated, "Alright go on ahead man."

70. On March 26, 2014 at approximately 9:32 a.m. (Call #35780), GREEN, who was using Target Phone 2, had a conversation with O'LEARY, was who was using phone number (773) 668-4241 ("O'Leary Phone 1").¹⁰ During this conversation, GREEN asked "Who down

¹⁰ Agents identified O'LEARY based on the following: Agents compared the likeness of the person who surveillance observed dropped a gun (discussed below in paragraph 115-124) to (1) undercover video of O'LEARY taken on April 9, 2014 during a controlled purchase of crack cocaine from O'LEARY and (2) known mug shots of O'LEARY; and concluded that the person who dropped the gun was O'LEARY. Further, agents know O'LEARY to be the user of O'Leary Phone 1 because: (1) the voicemail on this phone states, "You have reached the voicemail of John O'Leary," and (2) on April 1, 2014, during a traffic stop, O'LEARY self-identified as O'Leary and told officers that his phone number was O'Leary Phone 1.

[who is running the spot]?” O’LEARY replied, “Mook [REDMOND], I’m waiting on him to finish what he had from last night.” GREEN asked, “So who out there [selling crack cocaine on the spots]. O’LEARY replied, “Just him.” GREEN replied, “Oh yeah, how long is it gonna be before he finish what he had from last night?” O’LEARY stated, “Naw, but um, Mook just finish the shit he had though [REDMOND just finished selling all of the crack cocaine he had].”

71. On March 26, 2014, at approximately 11:25 a.m. surveillance observed GREEN, REDMOND, and RICHARDSON near the spot located at 316 S. Kilbourn (**Search Location G**).

72. On March 26, 2014, at approximately 12:59 p.m. (Call #35934), GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using Redmond Phone 1. REDMOND stated, “I’m gonna go grab some bags [to put individual rocks of crack cocaine in].” GREEN replied, “B, you missing a lot of P’s dude [if REDMOND did this, he would miss customers].” GREEN stated, “How many, how many, you got put up for me Joe [referring how much crack cocaine REDMOND has left].” REDMOND replied, “I got a thirty and shorty right here [a thirty and a fifteen pack of crack cocaine].” GREEN stated, “Okay, come bring thirty to my man Chico [LONGSTREET].”

73. On March 26, 2014, at approximately 2:26 p.m. (Call #35971), GREEN, who was using Target Phone 2, had a conversation with LONGSTREET, who was using phone number (773) 565-5424 (“Longstreet Phone 1”).¹¹ LONGSTREET asked, “Yeah, what we doing, still on

¹¹ On April 24, 2014, agents interviewed LONGSTREET on the street. During this interview, LONGSTREET self-identified as “Chico.” Agents compared this person to known mug shots of LONGSTREET and concluded that the person was LONGSTREET. “Chico” is also a known alias for

hold [LONGSTREET was asking if they were waiting for lack of crack cocaine to sell]?” GREEN replied, “Yeah.”

74. On March 26, 2014, at approximately 2:26 p.m. (Call #8596), HARRIS, who using Target Phone 3, had a conversation with REDMOND, who was using Redmond Phone 1. REDMOND asked, “Hey bro, shit, ah, motherfucker might be trying to come get five of what we talked about yesterday [crack cocaine]?” HARRIS replied, “Alright.”

75. On March 26, 2014, at approximately 3:11 p.m. (Call #35987), GREEN, who was using Target Phone 2, placed an outgoing call to RICHARDSON, who was using phone number (773) 557-0607 (“Richardson Phone 1”). During this conversation, GREEN asked, “Yo, where you at Joe?” RICHARDSON replied, “I had to grab some more bags [of crack cocaine].”

76. On March 26, 2014, at approximately 3:23 p.m. (Call #35999), GREEN, who was using Target Phone 2, had a conversation with RICHARDSON, who was using Richardson Phone 1. During this conversation, GREEN stated, “C’mon we got “P’s” right here Joe [crack cocaine customers].” RICHARSON replied, “Alright, here I come.”

77. On March 26, 2014, at approximately 3:31 p.m. (Call #8632), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, HARRIS asked, “What up, shit why don’t you call Big Shorty [MEEKS] for me have his ass walk up with that money [HARRIS asked GREEN to have MEEKS bring him the narcotics profit from selling on the spot]?”

LONSTREET. During this interview, officers called Longstreet Phone 1 and observed LONGSTREET answer the phone.

78. On March 26, 2014, at approximately 3:32 p.m. (Call #36014), GREEN, who was using Target Phone 2, placed an outgoing call to MEEKS, who was using phone number (773) 690-8587 (“Meeks Phone 1”).¹² During this conversation, GREEN stated, “I will have a fresh one [supply of crack cocaine] when I get back.”

79. On March 26, 2014, at approximately 3:34 p.m. (Call #8634), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, GREEN stated, “Yeah I’m ready [to be resupplied with crack cocaine].” HARRIS replied, “Alright.”

80. On March 26, 2014 at approximately 4:46 p.m. (Call #8678), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, HARRIS asked, “Where you at Jack?” GREEN replied, “Shit in front of Miss Dianne house.” HARRIS stated, “Four fimps, Congress [HARRIS wanted to meet on the 4500 block of West Congress].”

81. On March 26, 2014, at approximately 4:47 p.m., surveillance observed HARRIS exit his residence located at 2758 West Adams Street (**Search Location A**) in a blue Pontiac van. He exited by driving out of the detached garage behind his house.

82. On March 26, 2014, at approximately 4:47 p.m. (Call #36064), GREEN, who was using Target Phone 2, placed an outgoing call to LONGSTREET, who was using Longstreet

¹² On June 6, 2014, officers conducted a field interview of MEEKS, during which MEEKS told officers he was “Big Shorty.” Officers who conducted this interview looked at known mug shots of MEEKS and concluded that “Big Shorty” was MEEKS. During this interview, officers called Meeks Phone 1 and heard the phone ring in MEEK’s possession. The officers also listened to the voice of the user of MEEKS Phone 1 as captured on wire interceptions and concluded that MEEKS was its user.

Phone 1. GREEN told LONGSTREET, "Come on out Joe [GREEN was about to get crack, so LONGSTREET needed to come to work]." LONGSTREET replied, "Alright."

83. On March 26, 2014, at approximately 4:57 p.m. surveillance observed HARRIS park outside of 4531 West Jackson Avenue. At approximately 4:58 p.m., surveillance observed GREEN arrive at this location and enter HARRIS's van. GREEN was in HARRIS's van for less than one minute. Based on the above calls, agents believe that HARRIS supplied GREEN with crack to sell on the spots during this meeting.

84. Surveillance then observed GREEN enter a vehicle and drive toward the spot located at 316 South Kilbourn (**Search Location G**). He arrived at approximately 5:00 p.m.

85. On March 26, 2014 at approximately 4:58 p.m. (Call #36066), GREEN who was using Target Phone 2, had a conversation RICHARDSON, who was using Richardson Phone 1. During this conversation, GREEN stated, "Alright, I am going to slide up and give you one, coming up Kilbourn right now [GREEN was going to giving RICHARDSON of crack cocaine]." Surveillance observed GREEN meet with RICHARDSON at approximately 5:00 p.m.

86. On March 26, 2014, at approximately 5:38 p.m. (Call #36097), GREEN, who was using Target Phone 2, had a conversation with RICHARDSON, who was using Richardson Phone 1. During this conversation, RICHARDSON stated, "Yeah, hey where you at?" GREEN replied, "I'm pulling up, I'm riding on Gladys right now." RICHARDSON stated, "Alright, JB [O'LEARY] ain't got no more [the spot was out of crack]."

87. On March 26, 2014, at approximately 5:57 p.m. (Call #36104), GREEN, who was using Target Phone 2, had a conversation with HARRIS, who was using Target Phone 3. GREEN stated, "I'm ready bro, blew what you gave me [GREEN's workers had sold the crack

he got from HARRIS earlier that day and GREEN wanted more crack cocaine].” HARRIS replied, “Yeah.” GREEN stated, “I’m on the last one now.”

88. On March 26, 2014, at approximately 6:08 p.m. (Call #36120), GREEN, who was using Target Phone 2, had a conversation with O’LEARY, who was using O’Leary Phone 1. During this call, GREEN stated, “Famo, I thought I said come to the door G.” O’LEARY stated, “I did not hear you say come to the door.” Based on surveillance, agents believe that O’LEARY lives at the spot house located 316 South Kilbourn (**Search Location G**). Further, as discussed below, EDWARDS tells HARRIS that he was at O’LEARY’s house and agents observed him at 316 South Kilbourn (**Search Location G**). Agents believe that GREEN arrived at this location with an additional supply of crack cocaine to supply the drug spot operated out of this location.

89. On March 26, 2014, at approximately 6:45 p.m. (Call #36139), GREEN, who was using Target Phone 2, had a conversation with RICHARDSON, who was using RICHARDSON Phone 1. During this conversation, RICHARDSON asked, “Yo, where are you?” GREEN replied, “I am getting this money from CAUIRENCE.”

90. On March 26, 2014, at approximately 7:21 p.m. (Call #36213), GREEN, who was using Target Phone 2, had a conversation HARRIS, who was using Target Phone 3. During this conversation, HARRIS stated, “Motherfuckers got some checks [drug customers have money].” GREEN replied, “Yeah, gotta be something. Wheel chair man talking about he gotta swipe off his card and shit.” HARRIS stated, “Yeah, motherfuckers got paid today.” GREEN replied, “I got it [narcotics proceeds].” HARRIS stated, “Yeah, I’m gonna be about ten minutes meet up with you.”

91. On March 26, 2014, at approximately 8:03 p.m. (Call #36243), GREEN, who was using Target Phone 2, had a conversation with HARRIS, who was using Target Phone 3. During this conversation, HARRIS asked, “Where you at with it [the narcotics proceeds]?” GREEN replied, “On the four five [4500 block of Congress].” HARRIS then stated, “Alright, I’m fitting to pull up on you.”

92. On March 26, 2014, at approximately 8:06 p.m., surveillance observed HARRIS and GREEN parked near each other outside of 4521 West Congress Avenue. Based on the above calls, agents believe that GREEN gave HARRIS the narcotics profits at this time.

March 28, 2014: HARRIS and GREEN Will Use Violence to Protect the Spots

93. On March 28, 2014, at approximately 5:06 p.m. (Call #10011), HARRIS, who using Target Phone 3, called GREEN, who was using Target Phone 2. During this call, HARRIS asked, “Where you at?” GREEN responded, “Just pulled in the alley, right here on Jackson [Avenue].” HARRIS stated, “Man shit, you might have to come up here man. Bring a couple bumpers [guns] up here to this motherfuckin' car wash. These motherfuckin' 'migo's on something man. I don't know what the fuck they on [HARRIS thought that he might be robbed by Mexicans].” GREEN asked, “Want me to come right now?” HARRIS stated, “Yeah, bring somebody with you.” GREEN stated, “Alright here I come right now.” HARRIS stated, “Alright, shit don't just pull up like that shit circle around first. You know scout it out but just keep circling for a minute, I'm a hit you.”

April 1, 2014: HARRIS Supplies the Spot through GREEN

94. On March 31, 2014, at approximately 1:23 p.m. (Call #40287), GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using Redmond Phone 1.

During this call, REDMOND asked, “What the fuck is JB [O’LEARY] talking about?” GREEN answered, “He wanna work [sell narcotics].” REDMOND stated, “He done told you I gave him the other one didn’t he. . . he only had a deuce [\$200 worth of narcotics].” GREEN then stated, “No shit when we was in the car I was sayin I’m takin’ my pack G you heard that I say I’m takin’ my pack [GREEN is saying he will take one package of crack cocaine rocks].” REDMOND stated, “Right the hundred [REDMOND is confirming one package of crack cocaine as one package of 10 rocks is typically worth \$100.00 back to HARRIS and the DTO].” GREEN stated, “I said since Chico owe me some money, I’m takin’ my pack [instead of taking cash, GREEN is taking narcotics] right but when I got there Chico gave me the money. I say uh uh then get this then cause I was finna work my shit right [GREEN is going to sell the drugs he has on hand in order to make some immediate money] there and I said tell Mook [REDMOND] you got this so your count is thirteen, Kyrees got two got four-hundred [\$400 of drug proceeds] that nigger got four-hundred [another pack worker has \$400 of proceeds] and you got five-hundred [\$500] that’s thirteen [a total of \$1,300 in drug proceeds].” Later, GREEN stated, “Alright, I’m finna pull up right there cause you all discussin’ a lot on my line [GREEN admonished REDMOND for talking about drug amounts and proceeds too much on a phone line].”

95. On April 1, 2014, at approximately 8:23 a.m. (Call #12152), HARRIS, who was using Target Phone 3, received an incoming text from REDMOND, who was using Redmond Phone 1. This message read, “im out I got 30na shorty left [REDMOND is referring to having a pack of 30 rocks of crack cocaine and a pack of 15 rocks of crack cocaine left and wanting to be resupplied].”

96. On April 1, 2014, at approximately 8:39 a.m. (Call #40490), GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using REDMOND Phone 1. During this conversation, REDMOND stated, "I'm out here trying to finish up this lick right now [REDMOND's workers are selling the last of the crack cocaine]."

97. On April 1, 2014, at approximately 9:35 a.m. (Call #40509), GREEN, who was using Target Phone 2, sent a text message HARRIS, who was using Target Phone 3. This message read, "Ready [to be resupplied with crack cocaine]."

98. On April 1, 2014, at approximately 10:09 a.m., surveillance observed HARRIS exit his garage at 2758 West Adams (**Search Location A**) in his blue Pontiac van.

99. On April 1, 2014, at approximately 10:12 a.m. (Call #12221), HARRIS, who was using Target Phone 3, had a conversation with REDMOND, who was using Redmond Phone 1. During this conversation, HARRIS asked REDMOND, "Where you at?" REDMOND replied, "Here in the car with White Boy [GREEN], I'm finna give him the phone, I'm call you right back boss."

100. On April 1, 2014, at approximately 10:12 a.m. (Call #12223), HARRIS, who was using Target Phone 3, had a conversation with REDMOND, who was Redmond Phone 1]. REDMOND told HARRIS, "Yeah, we right here on Gladys." HARRIS replied, "Homies spot up there [HARRIS is referring to Donks Auto Shop located at 4727 West Arthington Avenue]."

101. On April 1, 2014, at approximately 10:17 a.m., surveillance observed HARRIS and GREEN arrive at the area near Chi-Town Donks Auto Shop in separate vehicles. Based on the above calls, agents believe that HARRIS supplied GREEN with crack cocaine during this meeting.

102. On April 1, 2014, at approximately 10:18 a.m. (Call #40560), GREEN, who was using Target Phone 2, had a conversation with O'LEARY, who was using O'Leary Phone 1. During this conversation, GREEN stated, "Alright, Uh, I was finna pull up so tell all them to be on point, just whoever you all in the car with." O'LEARY replied, "They in there with you." GREEN told O'LEARY, "Lord and Chico yeah, you, Lord and Chico, when I pull up y'all just bail in the car [GREEN is referring to O'LEARY, DESHAWN RICHARDSON and MARCUS LONGSTREET hopping in his car when he pulled up, so he could give them crack cocaine to sell on the spot]."

103. On April 1, 2014 at approximately 10:30 a.m. law enforcement observed RICHARDSON and O'LEARY exit GREEN's white Mercury Mountaineer at approximately 4432 West Jackson Boulevard.

104. On April 1, 2014, at approximately 12:26 p.m. (Call #40604), GREEN, who was using Target Phone 2, had a conversation with O'LEARY, who was using phone number O'Leary Phone 1. GREEN asked, "How long before you come back?" O'LEARY replied, "Uh, shit maybe thirty minutes." GREEN stated, "You know your door was open and shit, right? Lock the fuck up [GREEN is referring to the stash house at 316 S. Kilbourn (**Search Location G**) being unlocked]." GREEN stated, "Lil Lord is and Chico out here waiting [GREEN is referring to DESHAWN RICHARDSON being through selling his crack cocaine and MARCUS LONGSTREET waiting for more crack cocaine]."

105. On April 1, 2014, at approximately 12:28 p.m. (Call #40605) GREEN, who was using Target Phone 2, made an outgoing call to MARCUS LONGSTREET, who was using Longstreet Phone 1. GREEN told LONGSTREET, "I got, I got a lot of P's [drug customers]"

right there on the block [300 block of South Kilbourn].” LONGSTREET, replied, “Alright, I’m coming down Washington now.”

106. On April 1, 2014, at approximately 3:25 p.m. (Call #40672), GREEN, who was using Target Phone 2, sent a text message to HARRIS, who was using Target Phone 3. This message read, “Ready [to be resupplied with crack cocaine].”

107. On April 1, 2014, at approximately 4:36 p.m. (Call #40724), GREEN, who was using Target Phone 2, had a conversation with LONGSTREET, who was using Longstreet Phone 1. During this conversation, LONGSTREET asked, “Alright, I’m walking down Madison. You ready, or what [does GREEN have crack cocaine]?” GREEN replied, “Not yet.”

108. On April 1, 2014, at approximately 4:49 p.m. (Call #12361), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. HARRIS told GREEN, “Meet me at the carwash [ZAMUDIO’s Car Wash located at 4542 West Cermak Road (**Search Location B**)] on Cermak.” GREEN replied, “Alright.”

109. On April 1, 2014, at approximately 4:51 p.m. law enforcement observed HARRIS exit his residence at 2758 West Adams (**Search Location A**) and leave the location in his blue Pontiac van.

110. On April 1, 2014, at approximately 4:51 p.m. (Call #40747), GREEN, who was using Target Phone 2, had a conversation with LONGSTREET, who was using Longstreet Phone 1. During this conversation, GREEN stated, “Aight, when you come back park everything in sight and stay right there [GREEN will have the crack cocaine for LONGSTREET and other works to sell at the spot].”

111. On April 1, 2014, at approximately 5:07 p.m., surveillance observed GREEN turn northbound on Kostner heading away from the area where the Car Wash is located. Based on the above phone calls, agents believe that HARRIS met GREEN at the Car Wash where he supplied him with crack cocaine.

112. On April 1, 2014, at approximately 5:09 p.m. (Call #40800), GREEN, who was using Target Phone 2, had a conversation with LONGSTREET, who was using phone number Longstreet Phone 1. During this conversation, GREEN asked, “Who right there with you [working the spot].” LONGSTREET replied, “Me, Lil Lord, Crowbar, J.B. and Kee Kee [LONGSTREET was referring to DESHAWN RICHARDSON, ANDREW JONES, O’LEARY and an unknown person].

April 26, 2014: Law Enforcement Agents Seize a Gun from the HERNDON DTO

113. On April 26, 2014, at approximately 10:38 a.m. (call #23259), HARRIS, who was using Target Phone 3, called REDMOND, who was using Redmond Phone 1. During this call, REDMOND stated, “I ain’t got shit but 17 left [17 rocks of crack cocaine].” HARRIS replied, “Once you pay for that, why don’t you slide over here by um...Lawler and Ferdinand [so HARRIS could resupply REDMOND with crack cocaine].” Previously, at 10:27 a.m., surveillance had observed HARRIS exiting his residence located at 2758 West Adams Street **(Search Location A)**.

114. On April 26, 2014, at approximately 10:54 a.m., surveillance observed REDMOND meet with HARRIS in the vicinity of 439 North Lawler Avenue in Chicago inside of REDMOND’s van. Officers attempted to perform a traffic stop on the van, but REDMOND fled and eluded surveillance for several blocks. Ultimately, the van was stopped and

REDMOND was detained inside a police vehicle. Officers read REDMOND his *Miranda* rights, which he waived. REDMOND told officers that he did not want to go to jail and offered to get a gun for the officers if they would release him.

115. On April 26, 2014, at approximately 11:39 a.m. (call #23282), while in police custody, REDMOND, who was using Redmond Phone 1, received a phone call from HARRIS, who was using Target Phone 3. During this call, HARRIS stated, “Yeah, they trying to get up with you to make sure nothing happened to you.” REDMOND replied, “Man, they got me dude. They got me running G, someone put the people [police] on you bro.” HARRIS asked, “What?” REDMOND replied, “Man they made me make a phone call get them a gun and shit. They said right now.” HARRIS asked, “But you had something [drugs] on you?” REDMOND replied, “I had shit [crack cocaine] on the way back boy. I threw it out the fucking window. I’m inside the black Tahoe right now. They said get them a gun; make a phone call.” HARRIS replied, “Alright then.” REDMOND stated, “I’m at Adams and Kostner. Adams and Kostner.”

116. On April 26, 2014, at approximately 11:40 a.m. (call# 53450), HARRIS, who was using Target Phone 3, called GREEN, who was using Target Phone 2. During this call, HARRIS stated, “Hey, he talking about the motherfuckin’ police got me.” GREEN asked, “They got him where at?” HARRIS replied, “Adams and Kostner or some shit talkin’ bout give a gun for him.” GREEN wondered, “Fuck he get on Adams and Kostner?” HARRIS asked, “Who you talking to?” GREEN stated, “You know um just talking out loud, how the fuck he get on Adams and Kostner?” HARRIS stated, “Talking ‘bout somebody put them people [police] on him and all that shit, shit, you got something [a gun] to give them [the police]?” GREEN stated, “Um, um, my shit [gun] in the house.” Later, HARRIS stated, “I have a lil’ something for him, um, fittin’

to go grab it [a gun].” GREEN replied, “Alright um gone be chilling on the block, shit.” HARRIS stated, “Um, um bout to go grab this little motherfucking gun for this boy, man.”

117. On April 26, 2014, at approximately 11:52 a.m., surveillance observed HARRIS arrive at and park in the detached garage located behind his residence located at 2758 West Adams Street (**Search Location A**). At approximately 12:00 p.m., surveillance observed HARRIS exit the garage driving a Pontiac Montana. At approximately, 12:05 p.m. (call #53500), HARRIS, who was using Target Phone 3, called GREEN, who was using Target Phone 2. During this conversation, HARRIS stated, “Turn off uh right here on Avers [Avenue].” GREEN replied, “Come up?” HARRIS stated, “Yeah, right here.” At approximately 12:05 p.m., officers observed GREEN and HARRIS meet near 331 North Avers Avenue in Chicago, Illinois.

118. On April 26, 2014, at approximately 12:07 p.m. (call #53508), at the instruction of officers, REDMOND, who was using Redmond Phone 1, called GREEN, who was using Target Phone 2 (call# 53508). During this call, REDMOND stated, “Put it [the gun] on Wilcox [Avenue] at the end of the [train] track[s] by the hill.”

119. On April 26, 2014, at approximately 12:08 p.m. (call #23286), HARRIS, who was using Target Phone 3, called GREEN, who was using Target Phone 2. During this conversation, HARRIS stated, “Shit put that bitch [gun] in a plastic bag and throw that bitch right in the hole.”

120. On April 26, 2014, at approximately 12:14 p.m. (call #53521), GREEN, who was using Target Phone 2, had a phone conversation with LONGSTREET, who was using phone number (773) 565-5424 (“Longstreet Phone 1”). During this conversation, LONGSTREET asked, “Hey where you at?” GREEN replied, “I got one [a gun]. I’m trying to do it right now. Hit you right back.” LONGSTREET replied, “Alright, cool.”

121. On April 26, 2014, at approximately 12:14 p.m., surveillance observed GREEN meet with O'LEARY near the intersection of Monroe Street and Kenton Avenue in Chicago. Surveillance observed GREEN hand O'LEARY a white bag. Surveillance then watched O'LEARY run up the train embankment, scramble down the tracks, and then throw the white bag, which landed at approximately 4552 West Wilcox Street, Chicago, Illinois. At approximately 12:22 p.m., officers recovered the white bag, which contained a .22 caliber Ruger handgun. REDMOND was then released to protect the covert nature of the investigation. No promises were made to REDMOND regarding any criminal charges that he may face.

122. On April 26, 2014, at approximately 12:16 p.m. (call #53534), HARRIS, who was using Target Phone 3, called GREEN, who was using Target Phone 2. During this conversation, HARRIS stated, "Hold on, I'm talking to him now." HARRIS stated, "I said squally [the police] ain't even been around really." GREEN agreed and stated, "Hell nah. The one that got 'em [REDMOND], I ain't seen em them motherfuckin Transformer and God damn it uh, that motherfuckin black but uh that black Crown [unmarked surveillance vehicle] that's the one that always be around." HARRIS stated, "That's them, I think that dude in the with glasses [a police officer working on this investigation], he say he was in the Tahoe truck." GREEN stated, "Naw Mook [REDMOND] on the phone he tellin' 'em where to go [to retrieve the gun]." HARRIS asked, "Where you all put that bitch [firearm] at Whitey [GREEN]?" GREEN replied, "Where you told he told us to put it on the Wilcox on the EL [train platform]. We went on the other side though and climbed up the tracks and threw that motherfucker over there." HARRIS replied, "Alright." GREEN continued, "A little further before went up there, I parked on Monroe walked over, over there see if I seen anything and we went up there. Don't get me comin' back to this

motherfucker.” Later, GREEN stated, “No, we didn’t just throw it though we put it exactly where he say to put it at that was the police say to put it right there, I mean it’s in a bright ass white bag, exactly what the police say to do with it, put that motherfucker on the hill.” HARRIS stated, “Yes, probably ain’t even find the motherfucker, stupid ass [police officers].” GREEN replied, “That’s alright he [REDMOND] on parole.” HARRIS stated, “Probably ran though man he gotta pay me my money back money. His ass ‘sposed to been right there man. Fuck is he doin’ on doin’ what fuckin’ last [HARRIS told GREEN that REDMOND would have to pay him back for the crack cocaine that he threw out the window when the police were chasing him]?”

May 10, 2014: HARRIS Supplies the Spot Through GREEN

123. On May 10, 2014, at approximately 9:24 a.m., surveillance observed REDMOND standing in front of 316 S. Kilbourn, O’LEARY’s residence and the stash location for the spot **(Search Location G)**.

124. On May 10, 2014, at approximately 9:25 a.m. (#31254), HARRIS who was using Target Phone 3, had a conversation with REDMOND, who was using REDMOND Phone 1. During this conversation, HARRIS asked, “Where um, Scotty [GREEN] at?” REDMOND replied, “He on his way out, I just got through talking to him”.

125. On May 10, 2014, at approximately 9:35 a.m. surveillance observed GREEN parked in a blue Volkswagen Jetta, Illinois plate S633562 on the 300 block of South Kilbourn.

126. On May 10, 2014, at approximately 10:14 (Call #62209) GREEN, who was using Target Phone 2, had a phone conversation REDMOND, who was using Redmond Phone 1. During this conversation, REDMOND stated, “Aint’ nobody got nothing. Everything is out [REDMOND’s workers have sold all the crack they had].”

127. On May 10, 2014, at approximately 10:18 a.m., law enforcement observed HARRIS exit his residence located at 2758 West Adams Street (**Search Location A**).

128. On May 10, 2014, at approximately 10:22 p.m. (Call #31282), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, HARRIS told GREEN to meet him on the four fimps [HARRIS is referring to the 4500 block of West Jackson]. GREEN replied, "Alright. HARRIS the said, "Straighten ya out, Mook ass. He been back through yet [HARRIS is referring to giving GREEN crack cocaine and getting money from REDMOND]?. GREEN replied, "He [REDMOND] talking about he getting his shit [crack proceeds] together man, I'm sitting in front". GREEN stated, "I'm gonna be right here waiting on ya to come over there."

129. On May 10, 2014 at 10:27 a.m., surveillance observed HARRIS park his vehicle at approximately 4040 W. Congress. At this time law enforcement parked an unmarked police vehicle at 4042 W. Congress.

130. On May 10, 2014, at approximately 10:22 a.m. (Call #31290), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, HARRIS stated, "Don't come back around." GREEN replied, "Yeah, I know he just had us on Kilbourn." HARRIS and GREEN were referring to spotting the unmarked police vehicle.

131. On May 10, 2014, at approximately 11:09 a.m. (Call #31314), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, GREEN stated, "I'm coming back around, I think their [police] car by Kildare, guy shouldn't be in the street that motherfucking walking you don't want get hit too bad.

HARRIS asked GREEN, "Where you at?" GREEN replied, "On Keeler." HARRIS stated, "Middle of the block on Congress by Mook [REDMOND] house, tell them [spot workers] to walk in the building [to avoid being seen by the police]." [HARRIS is referring to 4537/39 W. Congress]. GREEN replied, "Alright." HARRIS stated, "Stand in the hallway, hit me on the block." Later, GREEN stated, "Naw, I said it look like somebody was in there, let you out right there Mook, walk to the building, to the hallway. I'm gonna get you [GREEN is referring to having REDMOND pick up the crack cocaine from HARRIS]. HARRIS stated, "Third floor [of 4537/49 W. Congress]." Surveillance then observed GREEN enter this address. Based on the above calls, agents believe that HARRIS supplied GREEN with crack cocaine during this meeting.

132. On May 10, 2014, at approximately 11:18 a.m. (Call #62376), HARRIS, who was using Target Phone 3, had a conversation with GREEN, who was using Target Phone 2. During this conversation, GREEN stated, "Yeah, I'm decent. Putting this shit up now" [GREEN is referring beginning to sell crack cocaine]." HARRIS replied, "Better go back see where that motherfucker at [HARRIS is referring to law enforcement surveillance]. GREEN replied, "Yeah, I am before I even do something, I just want to put that shit up."

May 15, 2014: REDMOND Gets Demoted, O'LEARY Gets Promoted

133. On May 15, 2014, at approximately 8:17 a.m. (call #65104) GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using Redmond Phone 1. During this call, REDMOND asked, "You got something [crack cocaine] left?" GREEN responded, "I think so, if J.B. [O'LEARY] ain't touched [sold] it." REDMOND stated, "I just need to know what they have left [how much crack cocaine the spot workers have left to sell]."

GREEN responded, “Chico [LONGSTREET] still got the deuce, I know he still got twenty something [user quantities of crack cocaine left to sell].”

134. On May 15, 2014, at approximately 10:04 a.m. (call #65117) GREEN, who was using Target Phone 2, sent a text message to HARRIS, who was using Target Phone 3. This message read, “My shit 26 or 27 wit shorty shit [GREEN had \$2,600 or \$2,700 in drug proceeds].”

135. At approximately 10:17 a.m., surveillance observed GREEN near 316 South Kilbourn Avenue (**Search Location G**) in Chicago, counting money. At approximately 10:21 a.m., law enforcement conducted a traffic stop on GREEN, REDMOND, and LONGSTREET. Officers search REDMOND and found him to be in possession of approximately \$2,500.

136. On May 15, 2014, at approximately 10:40 a.m. (call #65128) GREEN, who was using Target Phone 2, had a phone conversation with HARRIS, who was using Target Phone 3. During this conversation, GREEN asked, “You got my text?” GREEN continued, “Big shorty [MEEKS] and mine, it’s 26 or 27 [GREEN had \$2,600 or \$2,700 in drug proceeds to give to HARRIS].” HARRIS asked, “You just got your one didn’t you?” HARRIS continued, “Yeah, he told me to get one. He gave me twelve first and then I take one [HARRIS asked if GREEN kept one jab, or bag filled with approximately 13 rocks of crack cocaine as his compensation and GREEN confirmed that he did]. That’s what I am saying, he gave me twelve or thirteen the second time.” GREEN continued, “So thirteen, twenty-four, then Shorty’s shit, twenty-seven [\$2,700 in sales].” HARRIS stated, “Shit, I’m fittin’ to get up with ya [HARRIS was going to meet GREEN to resupply him with crack cocaine].” GREEN stated, “Alright.” HARRIS stated, “Like five minutes head that way.”

137. On May 15, 2014, at approximately 11:26 a.m. (call #34354) GREEN, who was using Target Phone 2, had a phone conversation with HARRIS, who was using Target Phone 3. During this conversation, HARRIS stated, "Meet me by Darven's [DARVEN MARION's residence location at 348 North Avers Avenue]."

138. On May 15, 2014, at approximately 11:27 a.m. (call #65171) GREEN, who was using Target Phone 2, had a conversation with REDMOND, who was using Redmond Phone 1. During this call, REDMOND stated, "Hello?" GREEN stated, "Lake and Avers [the location where they were to meet HARRIS]." REDMOND stated, "Alright." GREEN asked, "You know where that's at, right? When you go down when you make a left on Avers go down to that block and make that right, should be an orange truck with rims right there."

139. At approximately 11:30 a.m., surveillance observed HARRIS exit the 2758 West Adams Street (**Search Location A**) through the detached garage.

140. At approximately 11:37 a.m., surveillance observed HARRIS arrive near Lake Street and Avers Avenue. At approximately the same time, REDMOND arrived at that location, driving a silver Dodge van. The two vehicles traveled to near 3813 West Fulton Street, where surveillance observed HARRIS and REDMOND meet. HARRIS and REDMOND then departed in separate directions.

141. At approximately 11:42 a.m., officers, believing that REDMOND just received crack cocaine from HARRIS to distribute to spot workers, conducted a traffic stop on REDMOND. REDMOND, however, jumped out of the van and ran from officers. While running, officers and agents observed REDMOND toss a bag in the air. REDMOND was then arrested and transported to a police station.

142. At the police station, officers read REDMOND his *Miranda* warnings, which he waived. REDMOND told officers that there was \$800 worth of crack cocaine in the brown bag. He said that the crack belonged to a “GD,” meaning a member of the Gangster Disciples street gang. He also stated that “it wasn’t even his pickup [he was picking up drugs for GREEN].” REDMOND stated that he was going to get \$100 to pick up the crack cocaine. The bag contained six large plastic baggies, each large bag containing thirty small plastic bags, which each contained one rock of suspect crack cocaine. The suspect crack cocaine field tested positive for containing cocaine base and has been sent to the DEA lab for further analysis.

143. On May 15, 2014, at approximately 12:09 a.m. (call #65200), GREEN, who was using Target Phone 2, had a phone conversation with HARRIS, who was using Target Phone 3. During this conversation, GREEN stated, “Man Joe I don’t know what’s up with this nigger Mook [REDMOND] G. Man this nigger just called again G say he at Harrison and Kedzie and they want another bumper, talkin’ about it’s the same motherfuckers [REDMOND had been arrested by the same police officers as before and they want another gun to release him].” HARRIS replied, “Yeah, the police just had you in the alley [HARRIS is inquiring about the traffic stop where the police found REDMOND in possession of \$2,500]?” GREEN replied, “Yeah, in that lot in the forty-two [4200 block of West Jackson Boulevard] and we didn’t have shit, we had nothing [crack] on us.” HARRIS stated, “He said ya’ll had some money and some shit.” GREEN replied, “Man, all gave the money, he gave that shit back.” GREEN then explained that he had REDMOND meet with HARRIS because he had to take his child to school. Later, HARRIS stated, “It’s him man, he’ll send a motherfucker to jail with that shit he

got him [the crack cocaine that HARRIS gave to REDMOND was enough for the police to charge him with distribution].”

144. On May 15, 2014, at approximately 12:24 p.m. (Call #65221), HARRIS, had a conversation with GREEN, who was using Target Phone 2. During this conversation, GREEN stated, “Man, this motherfucker [the gun GREEN got to secure REDMOND’s release] looking pretty as hell too man.” HARRIS replied, “Yep.” GREEN stated, “A .380. He should have gave them [police] that long motherfucker [rifle]. Where that long motherfucker at?” HARRIS replied, “That long motherfucker yeah.” GREEN tells HARRIS, “I am going to put that motherfucker over there [gun] so I can get up on Roscoe and somebody and walk that bitch over there and drop, naw naw I am just saying some shit like that.”

145. While REDMOND was at the police station being interviewed by officers, REDMOND was allowed access to his cellular phone in order to obtain information about the location of where the firearm would be located for officers to recover. During this time, REDMOND was advised via a phone call from an unknown subject that the firearm would be located by a red truck in the area of Van Buren and Kolmar. REDMOND then advised officers of the location of the firearm. Officers then passed on the information to surveillance officers, working on this case, who were positioned in the area waiting to receive information on the location of the firearm to be recovered.

146. On May 15, 2014, at approximately, 12:40 p.m., law enforcement recovered a CZ, Model 27, .32 caliber handgun wrapped in 2 grocery bags by a red truck in the area of 411 South Kolmar Avenue, Chicago, Illinois. The firearm was subsequently turned over to ATF for appropriate tracing and evidence processing. REDMOND was then released to protect the covert

nature of the investigation. No promises were made to him regarding any charges that might be brought.

147. On May 15, 2014, at approximately 3:43 p.m. (Call #34554) HARRIS, who was using Target Phone 3, had a phone conversation with O'LEARY, who was using phone number (773) 556-3967. During this call, HARRIS told O'LEARY that REDMOND was going to be demoted as spot manager because of the arrest and O'LEARY was going to take over his shifts. More specifically, O'LEARY stated, "When they [the police] came out this morning it was Whiteboy [GREEN], Chicago [LONGSTREET], and Mook [REDMOND]. A crown got 'em, they ran their names, Mook had a little bit too much money." Later, O'LEARY stated, "But my thing G, why are you standin' around with all these dumbasses, staying there with all that motherfuckin' money in your pocket [O'LEARY was making his pitch to take over for REDMOND, who was arrested with HARRIS's crack cocaine, costing HARRIS money]." HARRIS responded, "They don't give a fuck about shit, man. They don't give no fuck, it ain't none of their asses money." Later, O'LEARY stated, "And just like you said G, it's is a little too much extra shit going on [police seizures and activity] and every motherfucker trying to play dumb and then they gotta explain it. I told him [REDMOND], I'm like man, first of all you fucked up, he [HARRIS] not gonna talk to you or nobody on the phone, the conversation you tryin' to have on the phone you need to have face to face." HARRIS replied, "He told the police some shit." O'LEARY then discussed what he felt was a strange police presence in the area. He later stated, "I'm out here though. Whatever you gonna do, I'm right here." I'm waitin' on you. You say the word, I'll fuckin' get this shit back in order [O'LEARY wants to be promoted to spot supervisor], 'cause I ain't finna be fuckin' with niggers if that's the decline they gonna be

on. I'm not gonna socialize with 'em and be around them like that, because they'll get a motherfucker bumped [killed]." Later, O'LEARY stated, "He [REDMOND] thinks they [the police] following you [HARRIS] and I say if he think they followin' him why he go get the shit [pick up the crack cocaine from HARRIS]." Motherfucker ain't tellin' you the whole story." HARRIS stated, "Yeah, shit, I need you to walk up to the store [HARRIS wanted O'LEARY to take over REDMOND's role as manager]." O'LEARY replied, "Alright, I'm fittin' to walk up to the store [the HERNDON DTO's main drug spot] right now, you heard me bro."¹³

June 7, 2014: HARRIS Arms Himself to Protect the DTO (Count Two)

148. On June 7, 2014 at approximately 9:11 p.m. (call #50952), HARRIS, who was using Target Phone 3, sent a text message to GREEN, who was using Green Phone 2. This text message read, "What u got on the heat [how many guns do you have]."

149. On June 7, 2014 at approximately 9:12 p.m. (call #50947), HARRIS, who was using Target Phone 3, had a phone conversation with GREEN, who was using Green Phone 2. During this conversation, GREEN stated, "I put mine [a gun] in storage, but I can get one though." HARRIS responded, "Yeah, at least a few." GREEN stated, "You telling me [you need] two [guns]?" HARRIS responded, "I said a few, so shit." GREEN stated, "Yeah Chico [LONGSTREET] got a couple of 'em too shit." HARRIS stated, "I got like one or two." GREEN stated, "I'm fittin' to get 'em on deck right now. I probably get two right now."

¹³ In addition to the wire intercept evidence discussed herein, the government used confidential sources to make crack cocaine purchases from HARRIS, GREEN, and other members of the DTO. More specifically, from May 7, 2013 through March 29, 2014, a source conducted 8 purchases of crack cocaine from HARRIS totaling in excess of 500 grams. From November 6, 2013 through April 5, 2014, confidential sources conducted five controlled buys with GREEN, during which they purchased approximately 32 grams of crack cocaine.

150. On June 7, 2014 at approximately 9:30 p.m. (call #50986), HARRIS, who was using Target Phone 3, had a phone conversation with an unidentified male (“UM-2419”), who was using phone number (312) 342-2419. During this conversation, UM-2419 stated, “Shit, why you didn’t call me man, you know I grab something [a gun], come over and sit there on your front.” Later HARRIS stated, “I said yeah, I’m probably finna need it [a gun], come on and do your thing . . . you on your way right now cause I probably can grab that [a gun] from you.”

151. On June 7, 2014 at approximately 9:46 p.m. (call #51009), HARRIS, who was using Target Phone 3, had a phone conversation with another unidentified make (“UM-6547”), who was using phone number (872) 214-6547. During this conversation, UM-6547 stated, “I’m standing on JB’s [O’LEARY] porch some lil got shot in the Clark Park, bro. He got me figuring that Whitey is on the way [UM-6547 assumed that the gang would call on its enforcer, GREEN to respond in retaliation for the shooting].”¹⁴

152. On June 7, 2014 at approximately 9:50 p.m. (call #51020), HARRIS, who was using Target Phone 3, had a phone conversation with Individual Five, who was using phone number (773) 953-3482. During this conversation, HARRIS stated, “Goddamn you, Goddam put the lick [lick is a term for a criminal act, such as a murder, robbery, or theft] on him.” Individual Five replied, “Huh.” HARRIS stated, “They say you goddamnit got back on him.” Individual Five replied, “Oh yeah, hahaha, yeah shit.”

¹⁴ Law enforcement believes that HARRIS was looking for guns and mobilizing the DTO in response to the murder of Gangster Disciple street gang member. According to a witness and police reports, this gang member died after being shot nine times by a single unidentified assailant at approximately 9:23 p.m. on the 4440 block of West Jackson Boulevard in Chicago.

153. In response to these urgent requests for a gun, law enforcement attempted to locate HARRIS before he could harm someone. At approximately 10:15 p.m., agents observed HARRIS and Individual One standing outside of a blue van with its side door open near 548 South Kilbourn Avenue. Officers observed HARRIS consuming alcohol and approached him. As they approached, officers observed HARRIS toss a silver hand gun into the van. Officers detained HARRIS and Individual One. Officers then recovered the gun that HARRIS tossed into the van, which was a loaded silver Rossi, Amadeo & Co. .357 caliber revolver bearing serial number F063110. During the subsequent search of the van, officers discovered another handgun, namely a loaded Glock Inc. .357 semiautomatic pistol bearing serial number KLN585. HARRIS was transported to the police station, where he was read his *Miranda* rights. After waiving his *Miranda* rights, HARRIS told officers that the .357 Rossi revolver was his gun, which he had for a few months. He told officers that he had it that night because he was wearing an expensive watch and wanted to protect himself from robbery. HARRIS was charged in state court with unlawfully possessing a weapon. He was released on bond on or about June 9, 2014. Individual One was found in possession of marijuana, but released on June 8, 2014 without charges being filed after Individual One arranged for an associate to surrender a 9mm Berretta Model 92 to the police. Individual One was released to protect the covert nature of the investigation and no promises were made to him/her regarding charging decisions.

154. Based on my training and experience, Rossi firearms are manufactured in Brazil. Therefore, the Rossi firearm discussed above traveled in interstate commerce prior to HARRIS's possession of it on June 7, 2014. In addition, Illinois Department of Corrections' records reflect that HARRIS has been convicted of multiple crimes punishable by in excess of one year

imprisonment prior to June 7, 2014, including: (1) on or about October 13, 1998 for aggravated battery, for which he was sentenced to two years' imprisonment; (2) on or about October 13, 1998 for manufacture and delivery of 15 to 100 grams of cocaine, for which he was sentenced to three years' imprisonment; and (3) on or about August 16, 2001 for possession of a controlled substance, for which he was sentenced to one year imprisonment.

3. Other DTO Managers and Street Workers: O'LEARY, EDWARDS, LONGSTREET, MEEKS, CAUIRENCE, RICHARDSON, JONES, and NEAL (Count One)

155. The investigation has also revealed that O'LEARY was promoted from street workers to manager and that EDWARDS became a spot manager in late June 2014. Also, wire interceptions, controlled buys from the spot, surveillance, and other investigative techniques revealed that LONGSTREET, CAURIENCE, JONES, and NEAL were spot workers.

a. JOHN O'LEARY, a/k/a "JB"

156. JOHN O'LEARY, also known as "JB," was a street-level work for the HERNDON DTO drug spot in the 300 block of South Kilbourn, who, during the course of the investigation, was promoted by HARRIS to spot manager with GREEN. O'LEARY has prior arrests in the area of the Kilbourn drug spot: a February 4, 2013, arrest for solicitation of unlawful business at 4510 West Van Buren; and a February 12, 2013, arrest for possession of a controlled substance at 4425 West Jackson. Law enforcement has also completed contact cards for O'LEARY at the following locations on the following dates: (1) on January 13, 2013, at 325 South Kostner; (2) on February 12, 2013, at 420 South Keeler; and (3) on March 23, 2014, at 316 South Kilbourn (**Search Location G**).

April 9, 2014 – Controlled buy of crack cocaine from O’LEARY

157. On April 9, 2014, an undercover police officer conducted a controlled buy of crack cocaine from O’LEARY.

158. Specifically, the officer travelled in an undercover vehicle area of Jackson and Kilbourn. The officer approached an individual he later identified as O’LEARY. The officer asked O’LEARY, “You up [have crack cocaine?]” O’LEARY responded, “Yeah, hault out.” The officer then parked the undercover vehicle and exited it.

159. The undercover officer approached the fence at 316 South Kilbourn (**Search Location G**) after exciting the residence. O’LEARY asked the officer, “How many?” The officer responded, “Five.” O’LEARY then reached into his mouth and retrieved five clear Ziploc bags with green tint, each containing what appeared to be crack cocaine. O’LEARY handed the five bags to the undercover officer, who handed O’LEARY \$50 in prerecorded cash. These suspected crack cocaine has been sent to the DEA laboratory for further analysis.

160. The undercover officer then returned to his vehicle drove from the area. Later that day, the undercover officer viewed a photo array containing a picture of O’LEARY, and identified a photo of O’LEARY as the person who sold him the crack cocaine.

April 23, 2014 – Controlled buy of crack cocaine from O’LEARY

161. On April 23, 2014, an undercover police officer conducted a controlled buy of crack cocaine from O’LEARY.

162. Specifically, the officer traveled in an undercover vehicle to the area of 316 South Kilbourn in Chicago (**Search Location G**). The undercover officer stopped his vehicle and asked O’LEARY if he was “up,” meaning selling crack cocaine. O’LEARY then directed the

undercover officer into the alley. The officer parked his vehicle in the rear of 4501 West Jackson on a cement slab. The undercover officer then exited the vehicle and walked to the front of the house.

163. The undercover officer again asked O'LEARY if he was "up" and stated that he had "got served [bought crack cocaine]" there before. O'LEARY told the officer that he had served him last time. O'LEARY then told the officer that he had nothing and directed the officer wait in his vehicle.

164. Later, O'LEARY approached the driver's side window of the undercover officer's vehicle. O'LEARY told the officer, "It's coming," and asked, "How many [bags of crack cocaine] you want?" The officer stated six, and negotiated the purchase of six bags for \$50. O'LEARY agreed. O'LEARY also wrote his telephone number, (773) 668-4241, and the nickname "JB" on a torn sheet of paper and gave it to the undercover officer for future purchases. The undercover officer then continued to wait in his vehicle.

165. After waiting for approximately 5 minutes, the undercover officer got out of his vehicle and tried to approach O'LEARY. O'LEARY directed the undercover back to his car and told him to wait. Eventually, O'LEARY approached the driver's side window of the undercover officer's vehicle. O'LEARY gave the undercover officer 6 clear bags with blue tint, each containing what appeared to be crack cocaine, and the officer handed O'LEARY \$50. The undercover officer mentioned that it had never taken so long in the past, and O'LEARY told the officer that the delay was caused by police presence in the area. The suspected crack cocaine has been sent to the DEA laboratory for further analysis.

Intercepted conversations reveal O'LEARY's role as a spot worker and then manager for the HERNDON DTO

166. As set forth above, intercepted conversations and surveillance reveal that O'LEARY participated in the resupplies of the drug spot by HARRIS and GREEN on March 26, 2014, and April 1, 2014. In addition, as set forth above, O'LEARY helped deliver a firearm to secure REDMOND's release from police custody for REDMOND was arrested in possession of crack cocaine on April 26, 2014.

167. As set forth above, following the May 15, 2014, arrest of REDMOND, HARRIS replaced REDMOND with O'LEARY as spot manager along with GREEN.

b. ANTWAION EDWARDS, a/k/a "Fee"

168. ANTWAION EDWARDS, also known as "Fee," was an individual who became a manager of the HERNDON DTO drug spots in late June 2014.

169. Law enforcement identified EDWARDS as follows: On July 9, 2014, at approximately 5:32 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #3323) with GREEN, who was using Green Phone 1. During the call, HARRIS asked, "You got Fee [EDWARDS] in the car with you?" GREEN indicated that "Fee" was on Kilbourn Avenue. HARRIS then stated, "Oh shit, I'm gonna get up with you so you, or you can get up with him, I mean you know you can give it to him [HARRIS was going to supply GREEN with crack cocaine to EDWARDS]." GREEN and HARRIS then arranged to meet at 4751 West Arthington. Surveillance observed that meeting take place at approximately 5:43 p.m., then observed GREEN arrive in the 300 block of South Kilbourn at approximately 5:59 p.m. Surveillance observed GREEN depart at approximately 6:06 p.m. Surveillance then observed an individual

later identified as EDWARDS involved in multiple hand-to-hand transactions in the south alley behind 4523 West Jackson. Law enforcement then engaged in an investigatory stop of EDWARDS. EDWARDS identified himself, indicated that he was known as “Fee” on the streets, and that he is a Gangster Disciple from Kilbourn and Jackson. The officers who conducted the investigative stop of EDWARDS later reviewed multiple intercepted calls over (773) 747-2599 (“Edwards Phone 1”) and recognized the voice of the speaker to be that of EDWARDS. Law enforcement also looked at known mug shots of EDWARDS and concluded that the person who identified himself as “Fee” was EDWARDS.

Intercepted telephone calls indicate that EDWARDS currently occupies a supervisory position at the HERNDON DTO drug spots

170. On July 10, 2014, at approximately 3:55 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #3386) with EDWARDS, who was using telephone number (773) 747-2599 (“Edwards Phone 1”). During this call, HARRIS stated, “I’m working on yours, got that thing [HARRIS was getting the crack cocaine ready to give EDWARDS to pass out to workers and sell].” EDWARDS responded, “I got that receipt for you [EDWARDS had drug proceeds to turn in to HARRIS from previous crack sales].” HARRIS responded, “Alright.”

171. On July 11, 2014, at approximately 4:28 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #3534) with EDWARDS, who was using Edwards Phone 1. During the call, EDWARDS stated, “Shit slow as hell, you know Whiteboy [GREEN] had put that shit on the block right [GREEN distributed the crack cocaine for the workers to sell but sales are slow].” HARRIS stated, “What?” EDWARDS responded, “The lick. He gave a thirty and a fifteen [EDWARDS received packs of 15 and 30 bags of crack cocaine from GREEN to sell].”

HARRIS stated, “Alright what wrong with that, he gave it to you didn’t he?” EDWARDS stated, “Yeah I ain’t tripping about him, I ain’t saying nothing, I’m just letting you know what’s going on, that’s all, I’m just told you what he had distributed out, it’s slow as hell, I ain’t saying nothing wrong G [EDWARDS stated he isn’t complaining he is just explaining what that the crack spot has been slow to sell what GREEN had given him].”

172. On July 14, 2014, at approximately 10:36 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #3798) with EDWARDS, who was using Edwards Phone 1. During the call, HARRIS asked, “What happening?” EDWARDS responded, “Shit, waiting on Whiteboy [GREEN] to bring his ass out [EDWARDS was waiting for GREEN to meet him at the crack spot].” HARRIS responded, “Aight.” EDWARDS stated, “But uh, we out here though, bro. We just waiting on Whiteboy to show up with the receipt, bro [EDWARDS and the other crack sellers are on the spot ready to sell crack and are waiting on GREEN to turn in money].” HARRIS responded, “I’m finna bend up on you [HARRIS is coming to meet him to give him crack and collect money].” EDWARDS replied “Okay, bro.”

173. On July 14, 2014, at approximately 10:49 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #3801) with EDWARDS, who was using Edwards Phone 1. During the conversation, HARRIS stated, “Yeah you started to walk uh, walk up Kolmar towards Harrison [HARRIS was directing EDWARDS to where he wanted to meet him and give him crack cocaine to distribute to the sellers].” EDWARDS responded, “Ten-four, I’m on my way right now.”

174. On July 14, 2014, at approximately 7:46 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #3907) with EDWARDS, who was using Edwards Phone 1.

During the call, EDWARDS stated, “Bro, yeah bro, I turned the fifteen into you already, you gave me the thirteen, told me to pull one off of that, got left twelve G [EDWARDS was explaining how much money he turned in to HARRIS and what crack cocaine he had receive from EDWARDS].” HARRIS responded, “Alright.” EDWARDS continued, “When I gave you the fifteen, you gave me the thirteen and stated take one off of that.” HARRIS then asked, “Yep, where the fuck ah that boy go to [HARRIS was asking EDWARDS about a crack seller working for them].” EDWARDS responded, “Shit, he on the block, I left his ass on the block [EDWARDS says he left the seller on the block to continue selling crack].”

175. On July 25, 2014, at approximately 8:35 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #5365) with EDWARDS, who was using Edwards Phone 1. During this call, HARRIS asked, “What up?” EDWARDS responded, “Shit uh, got everybody’s [street workers narcotics proceeds] but Chico’s [LONGSTREET].”

176. On July 25, 2014, at approximately 9:11 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #5371) with EDWARDS, who was using Edwards Phone 1. During this call, HARRIS asked, ‘Where you at with it [narcotics proceeds]?’ EDWARDS answered, “On Kilbourn in from of JB [O’LEARY] house [316 South Kilbourn Avenue (**Search Location G**)].”

July 16, 2014 – Intercepted telephone calls and surveillance show EDWARDS picking up the re-supply of crack cocaine from HARRIS

177. On July 16, 2014, at approximately 8:57 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4038) with EDWARDS, who was using Edwards Phone 1. During the call, EDWARDS stated, “I’m waiting on you [ready to receive a re-supply of crack

cocaine], I got everything for you [drug proceeds from the previous supply of crack cocaine].”

HARRIS replied, “Alright, okay.”

178. At approximately 10:32 a.m., surveillance observed HARRIS exit his residence at 2758 West Adams (**Search Location A**) and walk down toward the garage. Surveillance then observed HARRIS exit the garage.

179. On July 16, 2014, at approximately 10:36 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4041) with EDWARDS, who was using Edwards Phone 1. During the call, EDWARDS stated, “I’m riding up Congress bro.” HARRIS asked, “You on a bike?” EDWARDS replied, “Yep.” HARRIS replied, “Um ride over across the bridge to that alley where we was at that one time [HARRIS directed EDWARDS to a meeting location].”

180. At approximately 10:42 a.m., surveillance observed HARRIS parked in the west alley of the 800 block of South Kostner. Surveillance observed EDWARDS standing over a green bicycle next to the driver’s door of HARRIS’s vehicle.

181. At approximately 10:44 a.m., surveillance observed EDWARDS riding the green bicycle north on Kostner on the bridge over Interstate 290.

182. At approximately 10:47 a.m., surveillance observed EDWARDS enter the gangway of 316 South Kilbourn (**Search Location G**) and walk toward the rear of the residence, then enter the residence.

183. On July 16, 2014, at approximately 2:22 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4062) with EDWARDS, who was using Edwards Phone 1. During the call, HARRIS asked, “What up [inquiring about the crack cocaine sales]?” EDWARDS replied, “Shit, I’m good. I still got two thirties [thirty packs of crack cocaine].”

HARRIS replied, “Huh?” EDWARDS stated, “I still got two whole ones up [two packs of crack cocaine put away until ready to sell].”

184. On July 16, 2014, at approximately 4:27 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4109) with EDWARDS, who was Edwards Phone 1. During the call, EDWARDS stated, “Same with it, still go two whole ones left, hello [EDWARDS still have two packs of cocaine left to sell].” HARRIS replied, “Yeah you ain’t sold a bag since last time I talked to you [sold enough crack cocaine to give HARRIS money].” EDWARDS replied, “I still, I still got the whole two thirties [2 bags of 30 rocks of cocaine], but you know this thing was fifteen [EDWARDS has a told of 75 rocks of crack cocaine left to sell].”

July 18, 2014 – Intercepted telephone calls and surveillance show EDWARDS picking up the resupply of crack cocaine from HARRIS

185. On July 18, 2014, at approximately 10:02 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4237) with EDWARDS, who was using Edwards Phone 1. During the call, EDWARDS stated, “Shit, I’m waiting on you [waiting for a resupply of crack cocaine from HARRIS].” HARRIS replied, “Alright, I’m gonna call you in about ten minutes.” EDWARDS replied, “Alright bro I got that for you [crack cocaine proceeds].”

186. At approximately 11:09 a.m., surveillance observed HARRIS’s garage door open, and HARRIS exit the garage driving a Mitsubishi Montero.

187. On July 18, 2014, at approximately 11:14 a.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4243) with EDWARDS, who was using Edwards Phone 1. HARRIS asked, “Where you at Fee [EDWARDS]?” EDWARDS replied, “On JB porch, I got

my bike right here with me, where you want me to be at?" HARRIS replied, "Meet me by the alley." EDWARDS asked, "The same spot?" HARRIS replied, "Yeah."

188. At approximately 11:17 a.m., surveillance observed EDWARDS meet with HARRIS in the north alley of 5th Avenue (which connects to the west alley of South Kostner, where surveillance observed EDWARDS and HARRIS meeting on July 16, 2014). Surveillance observed HARRIS and EDWARDS conduct a hand-to-hand transaction. EDWARDS then biked from the area.

189. On July 18, 2014, at approximately 12:06 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4277) with EDWARDS, who was using Edwards Phone 1. HARRIS asked, "You ain't see any of those grey Taurus [a Ford Taurus car] through have you?" EDWARDS replied, "No ain't no Taurus come through but I'm on the lookout fo them [watching for law enforcement]. I'm on the lookout for anything too clean with a suspicious motherfucker in it [a car that looks like it is being used by law enforcement]. I'm watching all cars bro. They in everything bro. Sit. We on it and we're making a circle around this motherfucker from Kolmar dog damn it to Kostner [EDWARDS was on the lookout for law enforcement in the area]."

190. At approximately 8:28 p.m., HARRIS, who was using Target Phone 6, had a conversation (Call #4277) with EDWARDS, who was using Edwards Phone 1. During the call, HARRIS asked, "Fee bro, what up?" EDWARDS replied, "I'm waiting on you [to deliver crack cocaine and drop off crack cocaine proceeds]."

c. Marcus Longstreet, a/k/a “Chico”

191. MARCUS LONGSTREET, also known as “Chico,” is a street-level worker for the HERNDON DTO drug spots. LONGSTREET resides at 324 South Kilbourn in Chicago, near the HERNDON DTO drug spot located at 316 South Kilbourn. LONGSTREET has had frequent contact with law enforcement in the area, including arrests for possession of a controlled substance at the following locations on the following dates: (1) July 12, 2013, at 319 South Kilbourn; (2) August 22, 2010, at 310 South Kilbourn; (3) October 09, 2007, at 407 West Jackson; (4) May 22, 2005, at 4524 West Jackson; and (5) February 12, 2003, at 4400 West Gladys. Law enforcement has also completed contact cards for LONGSTREET at the following locations on the following dates: (1) April 30, 2013, at 340 South Kilbourn; (2) May 21, 2011, at 306 South Kilbourn; (3) June 28, 2010, at 314 South Kilbourn; and June 1, 2010 at 4445 West Jackson. As set forth below, multiple intercepted telephone calls and surveillance establish LONGSTREET’s position as a street seller for the HERNDON DTO.

192. LONGSTREET has been intercepted in multiple telephone calls taking instructions from GREEN regarding street sales on the block. As set forth in above, LONGSTREET was discussed and intercepted in recorded telephone calls regarding the supply and management of the drug spots by HARRIS.

193. Similarly, on March 28, 2014, at approximately 5:14 p.m., LONGSTREET, using (773) 565-5424 (Longstreet Phone 1), had a conversation (call #38131) with GREEN, who was using Target Phone 2. During the call, LONGSTREET stated, “Yeah, what you want me to do?” GREEN stated, “I’m finna open the van up.” GREEN continued, “And I’m gonna put it [the crack cocaine] in the uh, I’m gonna put it in the cup holder [GREEN was going to leave the

crack cocaine for LONGSTREET to sell in the cup holder of his van].” LONGSTREET stated, “Trash spot.” GREEN stated, “I’m finna open the van up and I’m gonna put it in the cup holder you just come get it and lock my door.” LONGSTREET stated, “Alright, bet.”

194. On March 30, 2014, at approximately 10:47 a.m., LONGSTREET, using Longstreet Phone 1, had a conversation (call #39498) with GREEN, who was using Target Phone 2. During the call, GREEN asked, “You just finished that shit [selling LONGSTREET’s pack of crack cocaine]?” LONGSTREET asked, “You say what?” GREEN stated, “You just finished that shit?” LONGSTREET stated, “Man, I, I got a couple bags left man [LONGSTREET still had crack cocaine to sell].” GREEN stated, “What happened? What’s wrong?” LONGSTREET asked, “Where you at big dog? You coming out or what?” GREEN stated, “Yeah, I’m coming. I’m pulling up over there. I was waiting on your ass to get done with that old shit [GREEN was waiting to deliver additional crack cocaine until LONGSTREET finished selling the crack cocaine he already had].” LONGSTREET stated, “Man, I ain’t, um boy, I been done. I ain’t owe him shit but a hundred dollars [LONGSTREET only owed HARRIS \$100 for unsold crack cocaine].” GREEN stated, “I guess that’s what... I guess that’s what a mother fucker was waiting on.” LONGSTREET stated, “You say what?” GREEN stated, “I guess that’s what his ass was waiting on. A hundred dollars.” LONGSTREET stated, “Really? And you a (laughter) How you gonna be a big dog and (laughter)? Come on man!” GREEN stated, “Hey, I wasn’t waiting on it. I wasn’t waiting on it.” LONGSTREET stated, “Naw, I know you mother fucker. I just...that’s what I’m saying. That’s why I’m calling you like what the fuck? Is you coming out [to deliver more crack cocaine, since all but \$100 worth had been sold]?” GREEN stated, “Yeah, I’m finna come out right now. I been up since seven, dope man!

One of you niggas answer the phone.” LONGSTREET stated, “Get on your shit. Get on your shit. I think he done made that move.” GREEN asked, “You gave him [HARRIS] the money already?” LONGSTREET stated, “Naw, I don’t hold the money.” GREEN stated, “I know. I say you gave him the money already?” LONGSTREET stated, “Naw, I ain’t done [LONGSTREET would give HARRIS the money when he was done selling the pack of crack cocaine].”

195. On April 11, 2014, at approximately 12:05 p.m., LONGSTREET, using Longstreet Phone 1, had a conversation (Call # 46373) with GREEN, who was using Target Phone 2. During the call, LONGSTREET stated, “Yeah what time you come back [when was GREEN returning to the spot]?” GREEN asked, “You say what?” LONGSTREET stated, “I say what time you coming back big dog?” GREEN stated, “What time I’m coming back like I’m finna to go for some hours or something?” LONGSTREET stated, “Yeah you jumped on the E way [expressway] and shit.” GREEN stated, “Boy I didn’t jump on no e-way. At my mama’s house.” LONGSTREET stated, “I’m just fuckin with ya.” GREEN stated, “No I’m dropping her off right now.” LONGSTREET stated, “Hey uh I got a mother fucker out here that wants a twelve for the hancha [LONGSTREET had a customer that wanted twelve rocks of crack cocaine, which normally sold for \$10 each, for \$100].” GREEN stated, “Oh you don’t want to do it that’s alright?” LONGSTREET stated, “Yeah, yeah no hell no get out my business man. I was gonna at least say like let’s do ten and ten [ten rocks of crack cocaine for \$10 each].” GREEN stated, “See but then I’m gonna be losin’ out tho you makin’ more than me on that deal.” LONGSTREET stated, “Oh boy, you are definitely lyin’.” GREEN stated, “You makin’ more than me on that deal. I got fifty to go.” LONGSTREET stated, “C’mon man it’s just me and you man on the real how been just us. What the fuck man?” GREEN stated, “Alright go ahead and hit

her [sell the crack cocaine] and we'll talk about when I get there." LONGSTREET stated, "Alright bet."

196. On April 24, 2014, surveillance observed LONGSTREET standing at approximately 324 South Kilbourn. As law enforcement approached, they heard someone shout, "Put it up." Based on my training and experience, "Put it up" is a common signal for individuals who are selling narcotics to leave the area when the police are around.

197. Also on April 24, 2014, agents interviewed LONGSTREET on the street. During this interview, LONGSTREET identified himself as "Chico." Agents compared this person to a known mug shots of LONGSTREET and concluded that the person was LONGSTREET. "Chico" is also a known alias for LONSTREET. During this interview, officers called Longstreet Phone 1 and observed LONGSTREET answer the phone.

198. On April 24, 2014, at approximately 9:01 p.m., LONGSTREET, using Longstreet Phone 1, had a conversation (Call # 52515) with GREEN, who was using Target Phone 2. During the call, GREEN stated, "My man, why you only give him \$230 Joe [GREEN wanted to know why LONGSTREET paid HARRIS only \$230 in drug proceeds]?" LONGSTREET stated, "Uh, cause I had two bags left [LONGSTREET had not sold all of his crack cocaine]." GREEN stated, "You just sold them. You just sold them." LONGSTREET stated, "Alright, I'm on my way back big dog. Ok?" GREEN stated, "Come on man! You got a hundred off the pack [LONGSTREET got \$100 per pack]! You could have cleared it off joe [LONGSTREET could have paid HARRIS for the cocaine out of his own share of the proceeds, even if he hadn't sold all of it yet]. How long is it finna take you to get right here Joe?" LONGSTREET stated, "Tell him to give you twenty dollars." GREEN stated, "Nope. He's right here listening. I'm not finna

pay him out of my money [GREEN was not going to cover LONGSTREET's debt]." LONGSTREET stated, "Alright...uh...uh...I'll be there in fuckin' 10 minutes. I'm right here on Madison right (inaudible)." GREEN stated, "Alright."

199. On May 1, 2014, at approximately 9:38 a.m., LONGSTREET, using Longstreet Phone 1, had a conversation (Call #56505), who was using Target Phone 2. During the call, GREEN stated, "Yo. Where you at?" LONGSTREET stated, "On the block." GREEN asked, "What you got left on your end [how much crack cocaine did LONGSTREET have left to sell]?" LONGSTREET stated, "Like four, five." GREEN stated, "Alright. Mook out there [was REDMOND there]?" LONGSTREET stated, "Yeah. He's sitting on the lot. Finny move." GREEN stated, "Alright."

200. On May 10, 2014, at approximately 9:44 p.m., LONGSTREET, using Longstreet Phone 1, had a conversation (Call #62799) with GREEN, who was using Target Phone 2. During the call, GREEN stated, "How it look for you?" LONGSTREET asked, "You say what?" GREEN stated, "How it look for you? You ready [for a new supply of crack cocaine]?" LONGSTREET stated, "No... Ah, yeah, yeah, come on. Let's do that. How that... give me one...." GREEN stated, "Alright, come on. I am sitting in front of the singer house."

201. On May 12, 2014, at approximately 5:32 p.m., LONGSTREET, using Longstreet Phone 1, had a conversation (Call # 63952) with GREEN, who was using Target Phone 2. During the call, GREEN stated, "Yo where you at?" LONGSTREET stated, "I'm right here on the block." GREEN stated, "Aight keep yo eyes up. I'm pulling up with this chicken [crack cocaine]." LONGSTREET stated, "Aight."

d. Manuel Meeks, a/k/a “Big Shorty” and “Shorty”

Calls and Surveillance Establish that MEEKS is a Street-Level Seller for the Herndon DTO

202. MANUEL MEEKS, also known as “Big Shorty” and “Shorty,” is a street-level worker for the HERNDON DTO drug spots. MEEKS has been arrested several times near the HERNDON DTO drug spot located at 4411 West Congress in Chicago, including the following arrests for possession of a controlled substance or soliciting unlawful business on the following dates: (1) July 5, 2014, at 4412 West Congress; (2) February 4, 2014, at 4401 West Congress; (3) February 11, 2009, at 4416 West Congress; (4) October 27, 2004, at 4441 West Congress; (5) July 17, 2002, at 4400 West Congress; (6) January 18, 2002, at 4424 West Congress; and (7) August 8, 2002, ay 4410 West Congress.

203. MEEKS has been intercepted in multiple telephone calls taking instructions from GREEN regarding street sales on the block. As set forth above, MEEKS was discussed and intercepted in recorded telephone calls regarding the supply and management of the drug spots by HARRIS through GREEN and REDMOND.

204. Similarly, on April, 5, 2014, at approximately 6:02 p.m., MEEKS, using Meeks Phone 1, had a conversation (Call #43615) with GREEN, who was using Target Phone 2. During the call, MEEKS asked, “Shit, you got two for me [MEEKS was asking for two packs of 30 bags of crack cocaine to sell]?” GREEN responded, “Not at this moment I don’t” and “I got the last one [GREEN was selling the last pack of crack cocaine that he had]” MEEKS responded, “Alright.”

205. On April 9, 2014 at approximately 11:41 a.m., MEEKS, using Meeks Phone 1, had a conversation (Call #45599) with GREEN, who was using Target Phone 2. During the call,

MEEKS asked, “You got something for me [MEEKS asked GREEN if he had crack cocaine for him to sell].” GREEN replied, “Yeah you gotta walk, walk over here on Kilbourn [GREEN wanted MEEKS to meet him near the spot on Kilbourn].” MEEKS stated, “I’m finna come around there now, I got this deuce too [MEEKS says he will come pick up crack cocaine to sell and has \$200 dollars to turn in to GREEN from previous crack cocaine sales.]” GREEN replied, “Alright.”

206. On April, 13, 2014, at approximately 9:30 p.m., MEEKS, using Meeks Phone 1, had a conversation (Call # 47210) with GREEN, who was using Target Phone 2. During the conversation, MEEKS asked, “do you have something else for me [MEEKS asked for some more crack cocaine packs to sell]?” GREEN stated, “I’m trying to get it now, dog.” MEEKS stated, “Alright.” GREEN asked, “Are you done with yours [finished selling his packs of crack cocaine].” MEEKS replied, “Really, yeah, shhiiiiittt I got enough to cash you out [pay for the previously supplied crack cocaine], that’s why I’m tryin’ to get another one [pack of crack cocaine].” GREEN stated, “Alright I will hit you in a few minutes [GREEN will bring MEEKS crack cocaine to sell].”

207. On April 15, 2014, at approximately 7:41 p.m., MEEKS, using Meeks Phone 1, had a conversation (Call #47851) with GREEN, who was using Target Phone 2. During the call, MEEKS stated, “Shit got uh like 11 boss, what you just reloading [MEEKS had 11 bags of crack cocaine left to sell and asked if GREEN was calling to give him more to sell]?” Later in the conversation, MEEKS stated, “Alright I ain’t got nothing but 11 more to sell you out.” GREEN replied, “Alright.”

208. On April 19, 2014, at approximately 11:01 p.m., MEEKS, using Meeks Phone 1, had a conversation (Call #49719) with GREEN, who was using Target Phone 2. During the call, MEEKS asked, “You, you out and about?” GREEN replied, “I’m out.” MEEKS asked, “Hey, you got some [crack cocaine to give MEEKS to sell]?” GREEN replied, “No I called this nigga at 8 o’clock [GREEN says he called HARRIS at 8 and has not got in touch with him to get more crack cocaine].” MEEKS replied, “Shit, I ain’t got nothin’ but like 4 loosey left [4 bags of crack cocaine]. Shit, gonna be hollering [the customers are going to be upset if they don’t get more to sell].”

209. On April 24, 2014, at approximately 9:08 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call # 21805) with REDMOND, who was using Redmond Phone 1. During the conversation, HARRIS asked, “What, what you say you got [HARRIS asked how much money REDMOND had from crack cocaine sales to turn in].” REDMOND respond, “I got everything but Cauirence owes a hundred and Big Shorty [MEEKS] still owes three [\$300].” HARRIS and REDMOND then discussed why MEEKS owed \$300. HARRIS stated, “No I’m talking about like he owed three hundred yesterday?” REDMOND responded, “Yeah he gave me a deuce [\$200]. I gave him a 30 [a pack of 30 bags of crack cocaine to sell].” HARRIS replied, “If you gave him a deuce?” REDMOND responded, “Yeah he gave me two [\$200]. I gave him a 30 back. He still have one [pack of crack cocaine]. So basically all he did is pay for a thirty [the \$200 that MEEKS paid REDMOND covered the 30 additional bags of crack cocaine REDMOND gave MEEKS to sell, but nothing more].”

210. On April 24, 2014, at approximately 9:08 p.m., HARRIS, who was using Target Phone 3, exchanged text messages with MEEKS, who was using Meeks Phone 1. HARRIS

texted (Call# 22329), “What you got [HARRIS was asking MEEKS how much money he had turn in].” MEEKS responded by text message (Call # 22339) “3 [MEEKS had \$300 to give him from selling crack cocaine.]”

211. On April 24, 2014, at approximately 10:40 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call #21866) with REDMOND, who was using Redmond Phone 1. During the call, HARRIS stated, “I’m not finna be talkin’ over no phone and all that shit man [HARRIS did not want to talk about money from crack cocaine sales over the phone].” HARRIS then stated, “Man where the rest of the money at man? I ain’t finna be sittin’ here arguing with you over no phone and all that shit man. Motherfucker, c’mon with the rest of the money while y’all steady be acting like y’all don’t know what the fuck be goin’ on and shit man. Ain’t no motherfucker got time for all this shit man [HARRIS was upset with REDMOND because he didn’t have the total amount due from the street workers to turn in to HARRIS.]” REDMOND responded, “Aight.” Later, REDMOND stated, “I know you know Caurience got a hundred [REDMOND says CAUIRENCE owed \$100 of crack proceeds to turn in].” HARRIS stated, “Man, the motherfuckin’ count that I gave you last night was what? Fourteen [\$1,400]. Where that’s at? You just gave me 1250 [\$1,250]. And them niggas already owed a motherfucker \$400 dollars man. You ain’t even... where that’s at? Didn’t Big Shorty [MEEKS] owe 300 [\$300] and Caurience owed it a hundred dollars man?” REDMOND stated, “Caurience owed a hundred.” HARRIS stated, “Where the money at man? You ain’t hand me shit but 1250 [\$1,250].” REDMOND stated “Big Shorty [MEEKS] still got, he still got three hundred. Big Shorty [MEEKS] still got still got three hundred [\$300 worth of crack cocaine to sell.]” HARRIS then stated, “The motherfuckin’ count supposed to be what? Fuckin’ that’s seventeen, eighteen

hundred. You ain't gave me shit but 1250 [\$1,250]. If he [MEEKS] got three, where the other money man?" REDMOND stated, "If he got three, that's fifteen [\$1,500]." HARRIS stated, "Where the other three [\$300] at?" REDMOND asked, "What other three?" HARRIS stated, "1250 [\$1,250] man. C'mon man! Do you, do you know how to count man? You ain't listenin' to what the fuck I'm tellin' you man! The count was fourteen. You were supposed to get shit out there!" REDMOND stated, "I ain't take, I ain't take shit off that count last night [REDMOND did not take any money for managing the crack cocaine sellers.]" HARRIS asked, "Where the count at? You ain't hand me shit! And they already owed it three hundred! And one hundred dollars was out already man. You don't know how to count? Fourteen, seventeen, eighteen man!"

212. On April 25, 2014, at approximately 8:49 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call #22977) with MEEKS, who was using Meeks Phone 1. During the call, HARRIS stated, "What's the deal?" MEEKS stated, "Trying to finish up right now [MEEKS stated he was trying to finish selling the crack]." HARRIS stated, "Go ahead with it." MEEKS responded, "A trey [MEEKS had \$300 so far in crack cocaine profits.]" HARRIS asked, "What you got left [how many bags of crack cocaine did MEEKS have left to sell]?" MEEKS stated, "Hold on, ten [10 bags of crack cocaine left to sell]." HARRIS stated, "Alright."

213. On April 28, 2014, at approximately 6:11 p.m. GREEN, using Target Phone 2, had a conversation (Call # 54968) with HARRIS, who was using Target Phone 3. During the call, HARRIS asked, "What's goin on cuz?" GREEN replied, "Yeah I'm ready [to get another amount of crack cocaine to disperse to the street sellers]." HARRIS responded, "Alright, alright gimme a minute." GREEN responded, "Alright."

214. On April 28, 2014, at approximately 6:27 p.m., GREEN, using Target Phone 2, had a conversation (Call# 54999) with MEEKS, who was using Meeks Phone 1. During the call MEEKS asked, "What up? You ain't out?" GREEN replied, "I'm out here." MEEKS asked, "You got some [crack cocaine for MEEKS to sell]?" GREEN responded, "In 3 minutes I will." MEEKS stated, "Shit I am on my way, just calling to check in [MEEKS stated he is coming out to sell crack cocaine.]"

215. On April 28, 2014, at approximately 10:56 p.m., GREEN, using Target Phone 2, had a conversation (Call #55155) with MEEKS, who was using Meeks Phone 1. GREEN asked, "What's the deal man [Green was asking MEEKS how much crack has he sold]?" MEEKS responded, "Shit, still got a long way to go [MEEKS had a lot more crack cocaine to sell before he is finished with what GREEN gave him]." GREEN replied, "Alright. That crown came up that way [GREEN warned MEEKS about the police being in the area]." MEEKS responded, "Up the one way and went back you all way [MEEKS saw the police car and responded]." GREEN stated, "Alright."

216. On May 12, 2014, at approximately 9:19 p.m., GREEN, using Target Phone 2, had a conversation (Call# 64062) with MEEKS, who was using Meeks Phone 1. MEEKS asked, "What up with you, that's you in the gas station?" GREEN responded, "Yeah." MEEKS stated, "Shit I got like ten more bags left, you decent though [MEEKS had 10 more bags of crack cocaine to sell]." GREEN responded, "I'm on the last, Chico [LONGSTREET] got the last one right now and then turn a motherfucker off [GREEN was telling MEEKS they are finishing up selling the rest of the crack for the night]." GREEN stated, "Yeah I'm gonna try and hit him and cash out though [GREEN told MEEKS to turn in his money so GREEN can pay HARRIS.]"

MEEKS responded, “You know I got like nine left [MEEKS had 9 bags of crack left to sell.]” GREEN replied, “Alright.”

February 4, 2014 – MEEKS Arrested In Possession of Crack Cocaine

217. On February 4, 2014, officers observed MEEKS in the area of 4401 West Congress Parkway. While conducting surveillance, the officers observed on three separate occasions an individual engage in what appeared to be a hand-to-hand transaction with MEEKS, in that the individuals handed MEEKS an unknown amount of cash and MEEKS retrieved a small object from his mouth and handed it to them.

218. Other officers responded to 4401 West Congress Parkway and saw MEEKS walking on the sidewalk. The officers exited their vehicle and approached MEEKS. As the officers approached, MEEKS spit several small plastic objects out his mouth and onto the ground. Officers retrieved the objects, which appeared to be 6 small plastic bags each containing a white rock-like substance that appeared to be crack cocaine. MEEKS was placed under arrest, and during a search of MEEKS officers found \$167 in cash. The suspect crack cocaine has been sent to the DEA laboratory for further analysis.

July 5, 2014 - MEEKS Arrested After He Delivered Crack Cocaine to an Undercover Police Officer

219. On the evening of July 5, 2014, an undercover officer conducted a controlled buy from MEEKS. Specifically, the undercover officer drove an undercover vehicle to the entrance to the alley at 4409 West Congress and parked. The undercover officer then engaged an individual later identified as Individual Four in conversation, stating, “You got any hard [crack

cocaine]?” Individual Four responded, “You got the money ready?” The undercover officer stated, “Yeah.”

220. Individual Four then approached an individual later identified as MEEKS. The officer saw MEEKS hand something to Individual Four, who then approached the driver’s side of the undercover officer’s vehicle. Individual Four handed the officer three small clear bags each containing a white rock-like substance that appeared to be crack cocaine. The officer handed Individual Four \$30 and then drove away through the alley.

221. Shortly thereafter, other officers stopped Individual Four and MEEKS. The undercover officer returned to the scene and identified Individual Four and MEEKS as the person who sold the crack cocaine to the undercover officer.

e. CAUIRENCE HERNDON

222. CAUIRENCE HERNDON (CAUIRENCE) is a street-level crack cocaine dealer who works at the HERNDON DTO drug spot located in the 300 block of South Kilbourn Avenue in Chicago. CAUIRENCE has several arrests for possession of a controlled substance in the area of the HERNDON DTO drug spots, including the following: (1) a January 30, 2012, arrest at 4443 West Gladys; (2) a May 27, 2009, arrest at 4430 West Jackson; (3) a May 24, 1998, arrest at 329 South Kilbourn and (4) a March 17, 1998, arrest at 4508 West Van Buren;

October 7, 2013 – CAUIRENCE Present During Traffic Stop of Green and Redmond With Drug Proceeds

223. On October 7, 2013, between approximately 8:10 p.m. and 8:30 p.m., surveillance observed multiple individuals approach the driver’s side of a 1993 blue Chevy van bearing

temporary Illinois license plates. Surveillance observed these individuals hand the individual in the driver's seat, later identified as GREEN, an unknown amount of cash.

224. At approximately 8:35 p.m., law enforcement conducted a traffic stop of GREEN's vehicle at approximately 4946 West Jackson, after he failed to use his turn signal before making a turn. GREEN was unable to provide a valid Illinois driver's license. GREEN exited the vehicle. Law enforcement asked GREEN if he had anything illegal, and GREEN stated he had a large amount of money under the front seat. When asked how much, GREEN stated that he had approximately \$4,000. GREEN claimed to have made the money selling auto parts.

225. At the time the vehicle was stopped, CAUIRENCE was in the passenger seat. Law enforcement directed CAUIRENCE to exit the vehicle and conducted a protective pat-down, during which law enforcement found CAUIRENCE to be in possession of approximately \$1,000. When asked where he received the money, CAUIRENCE stated, "Officer I am not going to treat you stupid and lie to you, I ain't got a job, I do what I do but I ain't a bad guy."

226. During the same traffic stop, REDMOND was seated in the back of the van. REDMOND was in possession of \$2,000. When asked where he got the money, REDMOND stated, "If I tell you, I'm gonna get into trouble."

October 8, 2013 – CAUIRENCE Serves Customers Crack Cocaine in the 300 Block of South Kilbourn

227. On the evening of October 8, 2013, surveillance observed GREEN sitting in the driver's seat of a blue Chevy conversion van bearing temporary Illinois license plates. The van was parked at 320 North Kilbourn.

228. Surveillance observed CAUIRENCE conduct what appeared to be multiple hand-to-hand transactions in the alley south of Jackson and east of Kilbourn. Surveillance then observed CAUIRENCE walk to the van in which GREEN was sitting and hand GREEN and unknown amount of cash. GREEN then handed an item to CAUIRENCE. Surveillance observed CAUIRENCE clutch them in his hand and run back into the alley, where he placed the item into a blue garbage can behind 4533 West Jackson. Surveillance then observed CAUIRENCE conduct what appeared to be several more hand-to-hand transactions, each time retrieving items from the garbage can.

229. At approximately 5:50 p.m., surveillance observed:

- a. An individual wearing a white long-sleeve shirt and blue jeans, later identified as Customer A, approach CAUIRENCE at the entrance to the alley;
- b. Customer A hand CAUIRENCE an unknown amount of cash;
- c. CAUIRENCE place the cash in his right front pocket;
- d. CAUIRENCE lifted up the lid of the blue garbage can and retrieve a package;
- e. CAUIRENCE remove an items from the package and hand them to Customer A;
- f. Customer A place the items in his front right pocket; and
- g. Customer A leave the area.

230. Surveillance followed Customer A to approximately 400 South Kostner, where he was approached by law enforcement. Customer A looked in the direction of the officers, then dropped to the ground two clear bags each with black spades on them. Law enforcement

immediately recovered the bags, which were later tested and determined to contain .1 grams of cocaine. Law enforcement advised Customer A of his Miranda rights, which he waived orally. Customer A stated that he had purchased crack cocaine from “a dude in an alley on Jackson on Kilbourn,” and that that area has historically had the highest quality crack cocaine on the west side.

231. Officers approached CAUIRENCE a short time later for a field interview. During a protective pat down of CAUIRENCE, an officer felt a large quantity of cash in his right front pocket. CAUIRENCE stated that he had about \$500 on his person. An officer looked underneath and inside the blue garbage can, but did not find anything. At this time, CAUIRENCE stated, “I know you two ain’t on that petty shit. If you were here 5 minutes ago you would of got me with the rocks [crack cocaine].”

April 25, 2014 – CAUIRENCE Sells Crack Cocaine to an Undercover Office at Kilbourn and Jackson

232. On April 25, 2014, at approximately 12:29 p.m., an undercover police officer drove to 316 South Kilbourn in an undercover vehicle and parked. The undercover officer spoke briefly with O’LEARY. During the conversation, the undercover officer asked O’LEARY, “are you up?” O’LEARY directed the officer to the alley behind 316 South Kilbourn (**Search Location G**). O’LEARY told the officer to locate “A tall skinny dude” named “Chyree.” The undercover officer asked for six bags of crack cocaine for \$50 dollars. O’LEARY agreed.

233. The undercover officer entered the alley, where an unknown female asked the officer if he was looking for “the house.” The officer indicated he was. The officer then saw O’LEARY directing him to keep walking west in the alley. The officer saw an unknown male

exit the rear of 4523 West Jackson. The officer walked toward this area and saw two men sitting on the back porch behind 4523 West Jackson. The officer asked for “Chyree,” and black male wearing a black sweatshirt and dark pants tendered the officer 6 small, clear, blue-tinted Ziploc bags, each containing a hard rock-like substance, suspected to be crack cocaine, in exchange for \$50. The officer later identified CAUIRENCE from a photo array as the person who gave him the crack cocaine. The suspect crack cocaine has been sent to the DEA laboratory for further analysis.

Intercepted Conversations Confirm CAUIRENCE’s Role as a Street Seller in the HERNDON DTO

234. As set forth above, HARRIS, GREEN, REDMOND, and others discussed the amount owed by CAUIRENCE and others for fronted crack cocaine from street sales. Additional examples include:

235. On March 1, 2014, at 2014, at approximately 11:10 a.m., HARRIS, who was using Target Phone 1, had conversation (Call #7707) with REDMOND, who was using Redmond Phone 1. During the call, REDMOND stated, “Hey, I uh shit I just cashed the last thing I had out here [sold the last pack of crack cocaine]. I gave, I’m waiting on Cauirence [CAUIRENCE] to turn in the receipt. I had went out last night and gave him four of them [four packs of crack cocaine]. He, he finished and Bama say he on his way out.” Shortly thereafter, HARRIS stated, “All right. Get with you in a second.”

236. On April 8, 2014, at approximately 9:23 p.m., GREEN, using Target Phone 2, had a conversation (Call #45452) with REDMOND, who was using Redmond Phone 1. During the call, GREEN stated, “What’s the deal joe?” REDMOND responded, “Shit, still out here.”

GREEN stated, "How long you staying out?" REDMOND stated, "Shit, until, until I'm done [finished selling the packs of crack cocaine], I'm almost done waiting on for Cauirence [CAUIRENCE] and JB [O'LEARY], whenever they finish [selling their packs of crack cocaine.]" GREEN stated, "You gone get some more [crack cocaine], or you gone call it [stop selling for the night] or what?" REDMOND stated, "Shit if I do I'm gonna let you know, you'll be the first to know, to come get, either get the receipt [drug proceeds] or. . ." GREEN stated, "I was fittin' say let me know so I can come get it [the drug proceeds or remaining crack cocaine]." REDMOND stated, "Right that's what I'm saying, you can come get receipt [drug proceeds] or the lick [remaining crack cocaine]. And you ain't gotta wait for me. You feel me?" GREEN stated, "Alright well let me know when you, when you ready." REDMOND stated, "Alright."

237. On April 15, 2014, at approximately 7:59 a.m., GREEN, using Target Phone 2, had a conversation (Call #47580) with REDMOND, who was using Redmond Phone 1. During the call, GREEN stated, "What up?" REDMOND stated, "Still out, finishing up, four piece [four packs of crack cocaine]." GREEN stated, "Who Cauirence [CAUIRENCE]?" REDMOND stated, "Hell naw, Cauirence [CAUIRENCE] still owe, it's really five, cause he, he owe a hundred. Aw, JB [O'LEARY] right here he finishing up his thirty [pack of crack cocaine], and Ant got a thirty [pack of crack cocaine], he got some bags from last night, not no thirty, but just some bags."

238. On April 15, 2014, at approximately 10:24 a.m. (Call #48081), GREEN, who was using Target Phone 2, placed a call to NEAL, who was using Neal Phone 1. During this call,

CAUIRENCE took the phone from NEAL.¹⁵ During this conversation, CAUIRENCE stated, “You got something [crack cocaine] for Trish [NEAL].” GREEN replied, “Yeah, I told her wait a minute squally [police] out . . . they just on the side of JB house [OLEARY’s residence, the spot house located at 316 South Kilbourn].” CAUIRENCE responded, “Poochie supposed to bring me a purse [narcotics proceeds].” GREEN, “I’m in JB crib [316 South Kilbourn (**Search Location G**)].”

239. On April 23, 2014, at approximately 10:12 a.m. (Call #51694), GREEN, who was using Target Phone 2, had a conversation with CAUIRENCE, who was using another individual’s phone. During this conversation, GREEN stated, “JB [O’LEARY] was supposed to give me 450, and he say you all split it 75/35 or something [narcotics proceeds].” CAUIRENCE responded, “Right, Mook [REDMOND] got 430 [dollars].” GREEN, “That what he crying about he don’t have twenty dollars to put on there [the money collection is short \$20].” CAUIRENCE responded, “\$20 to put on there?” GREEN stated, “That’s what he cryin’ about cause it weren’t 450 [\$450].” You gave him 230 [\$230], so he crying about \$20.” CAUIRENCE responded, “This got more complicated that it was supposed to be [keeping track of who owes what drug proceeds was proving difficult].”

f. DESHAWN RICHARDSON, a/k/a “Lil Lord”

240. DESHAWN RICHARDSON is a street-level seller for the HERNDON DTO drug spot located at Kilbourn and Jackson. RICHARDSON was arrested on October 22, 2012, for possession of a controlled substance at 4451 West Jackson, near the location of the drug spot. In

¹⁵ Officers who conducted the October 7, 2013 traffic stop on CAUIRENCE identified his voice on all calls discussed herein.

addition, recorded telephone calls, surveillance, and a controlled buy of crack cocaine establish RICHARDSON's role in the HERNDON DTO.

November 6, 2013 – Controlled Buy of Crack Cocaine from GREEN, RICHARDSON, and JONES

241. On November 6, 2013, law enforcement made arrangements for CS-3 to conduct a controlled buy from the Jackson and Kilbourn drug spot. Prior to the controlled buy, law enforcement searched the vehicle and person of CS-3 for contraband, and found none. Law enforcement then issued CS-3 \$200 in prerecorded cash and equipped CS-3 with audio and video recording devices. CS-3 then drove to the Jackson and Kilbourn drug spot, with law enforcement following in an undercover vehicle.

242. At approximately 11:25 a.m., CS-3 made a consensually recorded telephone call to GREEN. During the call, CS-3 stated, "I need two of dem um two jiggers [two jabs of crack cocaine]." GREEN asked, "Need two jabs?" CS-3 stated, "Yeah." GREEN responded, "Ahright." CS-3 then described his location.

243. At approximately 11:34 a.m., CS-3 placed a consensually recorded telephone call to GREEN. During the call, CS-3 stated, "Yeah White [GREEN] I'm on Gladys and Kilbourn whatcha gonna do joe?" GREEN stated, "Ahright I see you. Stay right there joe."

244. At approximately 11:35 a.m., surveillance observed GREEN arrive and park his blue Chevy van at approximately 321 South Kilbourn in the alley. Surveillance observed JONES park his Nissan in front of GREEN's van.

245. At approximately 11:36 a.m., CS-3 and GREEN spoke through the driver's side window of GREEN's van. During the conversation, CS-3 asked, "Now, what's up, you ready?"

GREEN responded, "Yeah, they [GREEN's workers] walking through the alley he only got half [1 of 2 jabs] on him." Later in the conversation, CS-3 stated, "Oh man, so it's gonna be a quarter [25 rocks of crack cocaine] twenty-five man, not no twenty." GREEN responded, "Yeah Crowbar [JONES] coming with the other half."

246. At approximately 11:36 a.m., surveillance observed RICHARDSON approach GREEN's van and engage GREEN in conversation. During the conversation, GREEN stated, "Meet Crowbar [JONES] and tell him. He already know." RICHARDSON stated, "Come on, Crow." GREEN stated, "He got the other half [half a package of crack cocaine, or approximately 15 rocks]." RICHARDSON stated, "The other what, six?" GREEN replied, "No, he want two [packages of crack cocaine], yeah get your twelve [rocks of crack cocaine]." According to CS-3 and the recording, CS-3 then paid GREEN \$200 in cash.

247. At approximately 11:38 a.m., surveillance observed RICHARDSON walk to the driver's side of JONES's Altima, where he and JONES engaged in a hand to hand transaction.

248. At approximately 11:39 a.m., surveillance observed RICHARDSON and CS-3 and engage in a hand-to-hand transaction. According to CS-3 and the recording, RICHARDSON gave CS-3 twenty-five bags of crack cocaine after retrieving half of the bags from JONES. CS-3 then drove from the area and met law enforcement at a predetermined meet location, where law enforcement recovered 25 bags, each containing a white rock-like substance that appeared to be crack cocaine. The suspect crack cocaine has been sent to the DEA laboratory for further analysis.

December 5, 2013 – Controlled Buy of Crack Cocaine from RICHARDSON

249. On December 5, 2013, law enforcement made arrangements for CS-3 to conduct a controlled buy from the Jackson and Kilbourn drug spot. Prior to the buy, law enforcement searched the vehicle and person of CS-3 for contraband, and found none. Law enforcement then issued CS-3 \$50 in prerecorded cash and equipped CS-3 with audio and video recording devices. CS-3 then entered his vehicle and drove to Kilbourn and Jackson, with two officers following in a covert vehicle.

250. At approximately 11:26 a.m., surveillance observed CS-3 arrive and park at approximately 4443 West Gladys. Surveillance observed CS-3 approach GREEN's blue Chevy van, which was parked at approximately 4442 West Gladys.

251. At approximately 11:29 a.m., surveillance observed RICHARDSON approach a green pick-up truck at approximately 337 South Kilbourn, in the alley, and engage in a hand-to-hand transaction with the driver of the truck. Shortly thereafter, surveillance observed CS-3 go the east alley of 335 South Kilbourn, where CS-3 was approached by RICHARDSON.

252. At approximately 11:30 a.m., surveillance observed RICHARDSON conduct a hand-to-hand transaction with CS-3.

253. At approximately 11:31 a.m., surveillance observed CS-3 enter his vehicle and leave the location. CS-3 drove to meet law enforcement at a pre-determined location.

254. According to CS-3 and the recording, CS-3 asked GREEN for a "piece [a large chunk of crack cocaine]" and GREEN told CS-3 he did not do pieces. GREEN then asked for \$50 worth of crack cocaine, at which time GREEN directed CS-3 to RICHARDSON. In the

alley, RICHARDSON gave CS-3 5 bags of crack cocaine for \$50, which CS-3 turned over to law enforcement.

Intercepted telephone calls and surveillance establish RICHARDSON's role as a street seller for the HERNDON DTO

255. On March 18, 2014, at approximately 10:10 a.m., GREEN, who was using Target Phone 2, had a conversation (Call #31743) with RICHARDSON, who was using phone number (773) 557-0607 (Richardson Phone 1). During the conversation, RICHARDSON stated, "He got it, where he go. Hey, so you want this four [four hundred dollars of crack cocaine proceeds]?" GREEN replied, "Huh, all right bro, I was going to see if you were cool." RICHARDSON asked GREEN, "Hey, Crowbar [JONES] gave you my money last night [RICHARDSON's proceeds from the previous day's crack cocaine sales]?" Later in the conversation, GREEN stated, "I said as soon as I come back I got you [GREEN will supply additional crack cocaine for RICHARDSON to sell]." RICHARDSON replied, "All right."

256. On March 26, 2014, at approximately 3:11 p.m., GREEN who was using Target Phone 2, had a conversation (Call #35987) with RICHARDSON, who was using Richardson Phone 1. During the conversation, GREEN asked, "Yo, where you at Joe?" RICHARDSON replied, "I had to go grab some more bags [bags of crack cocaine]."

257. On March 26, 2014, at approximately 3:23 p.m., GREEN who was using Target Phone 2, had a conversation (Call #35999) with RICHARDSON, who was using Richardson Phone 1. During the conversation, GREEN stated, "C'mon we got P's right here [GREEN is referring to P's, coded language for customers who purchase several bags of crack cocaine at one time]."

258. On March 26, 2014, at approximately 4:58 p.m., GREEN, who was using Target Phone 2, had a conversation (Call #36066) with RICHARDSON, using phone number Richardson Phone 1. During the call, GREEN stated, “Alright, I am going to slide up and give you one, coming up Kilbourn right now [GREEN was referring to giving RICHARDSON one pack of crack cocaine, which typically contained 30 bags, for RICHARDSON to sell].”

259. On March 31, 2014, at approximately 9:14 a.m., GREEN, who was using Target Phone 2, had a conversation (Call #40112) with RICHARDSON, using phone number Richardson Phone 1. During the conversation, GREEN asked, “Still got that shit from last night [crack cocaine that GREEN gave RICHARDSON the previous day]?” RICHARDSON replied, “I got one left [one pack of 30 bags of crack cocaine].” GREEN asked “Who else is out there [working the drug spot]?” RICHARDSON stated, “Mook [FABIAN REDMOND].”

260. On March 31, 2014, at approximately 11:12 p.m., GREEN, who was using Target Phone 2, had a conversation (Call # 44974) with RICHARDSON, using Richardson Phone 1. During the conversation, RICHARDSON stated, “Yeah, I’m gonna be there with that shit [crack cocaine].” GREEN replied, “Oh, I was finna send her your number [GREEN is referring to giving a drug customer RICHARDSON’s number].”

261. On May 18, 2014, at approximately 6:56 p.m., GREEN, who was using Target Phone 2, had a conversation (Call #995) with RICHARDSON, using phone number Richardson Phone 1. GREEN stated, “Alright, I’m right here on Kilbourn.” RICHARDSON replied, “You got that money from JB, huh [crack cocaine proceeds from JOHN O’LEARY]?” GREEN stated, “What you say?” RICHARDSON asked, “You got that money from JB?” GREEN asked, “Uh,

uh what you give him [how much money]?” RICHARDSON replied, “I gave him 230 [\$230 in drug proceeds].”

g. ANDREW JONES, a/k/a “Crowbar”

262. ANDREW JONES, also known as Crowbar, is a street-level seller for the HERNDON DTO.

November 6, 2013 – Controlled Buy of Crack Cocaine from GREEN, RICHARDSON, and JONES

263. As set forth in paragraphs 243-250 above, on November 6, 2013, an undercover officer purchased crack cocaine from GREEN, RICHARDSON, and JONES. JONES has several arrests for possession of a controlled substance near the HERNDON DTO drug spots, including: (1) a September 12, 2006, arrest at 302 South Kolmar; (2) an April 4, 2014, arrest at 4443 West Gladys; (3) a May 14, 2012, arrest at 309 South Kilbourn; (4) a June 6, 2013, arrest at 4459 West Jackson; and (5) an April 4, 2014, arrest at 4443 West Gladys.

February 19, 2014 – Controlled Buy from REDMOND, RICHARDSON, and JONES

264. On February 19, 2014, law enforcement made arrangements for CS-3 to conduct a controlled buy from the Jackson and Kilbourn drug spot.

265. At approximately 12:00 p.m., CS-3 placed a recorded telephone call to RICHARDSON, in which he ordered 36 rocks of crack cocaine for \$300.

266. At approximately 12:43 p.m., law enforcement search CS-3 for contraband and cash, and found none. Law enforcement then gave CS-3 funds to purchase crack cocaine and equipped CS-3 with recording devices.

267. At approximately 12:46 p.m., CS-3 arrived near Jackson and Kilbourn. As he arrived, JONES stated, "Go through the alley over there [JONES was directing CS-3 to a location to purchase crack cocaine]." CS-3 stated, "I'm on somethin' else joe [CS-3 had made other arrangements]. I'll holler at you in a min, holler at you in a minute."

268. At approximately 12:47 p.m., CS-3 met with RICHARDSON in the 300 block of South Kilbourn. RICHARDSON told CS-3 that he did not have the crack cocaine.

269. Shortly thereafter, REDMOND walked off the porch at 316 South Kilbourn (**Search Location G**). According to CS-3 and the recording, REDMOND and RICHARDSON had a conversation about RICHARDSON's previous agreement to sell CS-3 36 bags of crack cocaine for \$300. REDMOND then directed RICHARDSON to sell CS-3 "thirty rocks" for \$260. Surveillance then observed REDMOND enter 316 South Kilbourn.

270. Shortly thereafter, RICHARDSON told CS-3 that he had only four bags left. JONES and CS-3 then had a conversation in which JONES admonished CS-3 for not ordering the crack cocaine from him. Specifically, after CS-3 explained that he had called RICHARDSON with his order, JONES stated, yelled profanities and stated that CS-3 should have asked JONES for the crack cocaine. Later, JONES stated, "You ain't even try you just walk right past a motherfucker [JONES was upset CS-3 had walked past him]. That's my whole thing. I know I know what you was when you come walkin' your ass up the street with that slow ass bop, I told you that give y'all self away, ya'll walk with that slow ass bop when y'all got seven hundred on you when y'all ass got that nine dollars y'all be like with the motherfuckin man I hope he gonna take it and he finna talk so much shit, this bitch ass nigger he finna piss me off [JONES was upset that CS-3 walked past him when had a large order to place, but at other

times CS-3 would ask JONES for individual rocks of crack cocaine at a discount, such as \$9 for a \$10 bag].”

271. Eventually, REDMOND agreed to sell CS-3 12 rocks of crack cocaine for \$100. CS-3 gave REDMOND \$100 and REDMOND gave CS-3 the 12 rocks of what appeared to be crack cocaine. REDMOND then directed CS-3 to JONES to purchase the remainder of the crack cocaine.

272. Shortly thereafter, according to CS-3 and the recording, JONES and CS-3 negotiated for the remainder of the crack cocaine. CS-3 asked JONES for “twenty-four [rocks of crack cocaine] for the two hundred [\$200 that CS-3 had remaining].” JONES agreed to give CS-3 “twenty-three [rocks of crack cocaine]” for the \$200. Eventually, CS-3 gave JONES \$200 and JONES gave CS-3 twenty-three individual bags containing suspect crack cocaine.

273. CS-3 then left the area and met with law enforcement at a predetermined location. Law enforcement recovered the recording devices and 35 small plastic baggies containing a substance that appeared to be crack cocaine. The suspect crack cocaine has been sent to the DEA laboratory for further analysis.

April 4, 2014 – JONES Arrested with a Pack of Crack Cocaine after HARRIS and REDMOND Re-supply the spot

274. On April 4, 2014, at approximately 9:00 a.m., GREEN, using Target Phone 2, had a conversation (Call #42392) with MEEKS, who was using Meeks Phone 1. MEEKS asked, “Who the day, the day is yours [MEEKS was asking if GREEN was running the spot that day]?” GREEN stated, “Right, what you say?” MEEKS replied, “Today your day?” GREEN stated, “Uh uh [No].”

275. At approximately 9:43 a.m., GREEN using Target Phone 2, had a conversation (Call #42435) with JONES, who was using phone number (773) 606-3176 (“Jones Phone 1”).¹⁶ GREEN asked, “What you do with your count [crack cocaine proceeds]?” JONES replied, “Shit I still got fifteen bags man [bags of crack cocaine left to sell].” GREEN asked, “Oh, okay what you been doing on one?” JONES replied, “Shit ain’t nobody been coming over here. I been out here since seven thirty ain’t nobody coming [JONES is referring to a lack of customers].” GREEN stated, “Alright, don’t give it to Mook, I’ll be there to get it [GREEN instructed JONES not to give his crack cocaine proceeds to REDMOND].”

276. On April 4, 2014, at approximately 12:12 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call #13697) with GREEN, who was using Target Phone 2. HARRIS stated, “I got to get up with and grab that receipt [crack cocaine proceeds].” GREEN replied, “Let me know when you coming.”

277. On April 4, 2014, at approximately 12:38 p.m., GREEN, using Target Phone 2, had a conversation (Call #42577) with JOHN O’LEARY, who was using phone number O’Leary Phone 1. O’LEARY asked, “Crowbar got something [O’LEARY was asking if JONES had any crack cocaine].” GREEN replied, “I think so he got something, Chico he say you gave him some yeah, he got one [pack of crack cocaine].”

278. On April 4, 2014, at approximately 12:52 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call #13697) with GREEN, who was using Target Phone 2. During the call, GREEN stated, “Sitting in front of Pooch’s house talking to Mook [REDMOND].”

¹⁶ Your Affiant and another law enforcement officer interviewed JONES in Cook County Jail after his April 2014 arrest and compared JONES’s voice to voice of the user of Jones Phone 1 and concluded that JONES was its user.

HARRIS replied, "Why don't you meet me by my homie's shop over there [Donk's shop 4727 W. Arthington]?"

279. At approximately 12:59 p.m., law enforcement observed HARRIS park on the 4700 block of West Arthington.

280. On April 4, 2014, at approximately 12:59 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call #13760) with GREEN, who was using Target Phone 2. GREEN asked, "What are you going to do?" HARRIS replied, "Shit, I'm fitting to come up Harrison right now turning on Harrison and Cicero."

281. On April 4, 2014, at approximately 4:28 p.m., HARRIS who was using Target Phone 3, received an incoming text (Call #13810) from REDMOND, who was using Redmond Phone 1. REDMOND text read, "Ready [for a crack cocaine shipment and drop off crack cocaine proceeds]."

282. At approximately 4:35 p.m., law enforcement observed HARRIS leave the area of the 4700 block of West Arthington in his blue Pontiac van.

283. On April 4, 2014, at approximately 6:17 p.m., HARRIS, who was using Target Phone 3, placed an outgoing text (Call # 13880) to REDMOND, who was using Redmond Phone 1. HARRIS texted, "Yo [is ready to drop off crack cocaine and pick up proceeds]."

284. On April 4, 2014, at approximately 6:25 p.m., HARRIS, who was using Target Phone 3, received an incoming text (Call #13892) from REDMOND, who was using Redmond Phone 1. The text read, "Ready."

285. On April 4, 2014, at approximately 6:25 p.m., HARRIS, who was using Target Phone 3, placed an outgoing text (Call # 13893) to REDMOND, who was using Redmond Phone 1. HARRIS texted, “WYA [where you at?]”

286. On April 4, 2014, at approximately 6:27 p.m., HARRIS, who was using Target Phone 3, received an incoming text (Call #13896) from REDMOND, who was using Redmond Phone 1. REDMOND texted, “on gladys.”

287. At approximately 6:36 p.m., law enforcement observed HARRIS exit his residence at 2758 W. Adams (**Search Location A**) and leave the area in his blue Pontiac van.

288. On April 4, 2014, at approximately 6:37 p.m., HARRIS, who was using Target Phone 3, had a conversation (Call # 13907) with REDMOND, who was using Redmond Phone 1. During the call, HARRIS stated, “I’m on the four fimps [4500 block of West Congress].”

289. At approximately 6:40 p.m., law enforcement observed HARRIS arrive and park in the 4500 block of West Congress, on the north side of the street.

290. At approximately 6:42 p.m., law enforcement observed REDMOND walk up to HARRIS’s passenger window and extend his arm into HARRIS’s vehicle. Surveillance then observed REDMOND cross the street and enter the driver’s seat of his silver Dodge van and leave the area. Surveillance observed the vehicle traveling east on Van Buren. REDMOND is later observed entering 4523 W. Jackson.

291. At approximately 7:20 p.m., officers on patrol approached JONES in the area of 4446 West Gladys near the alley. JONES looked in the officers’ direction and JONES dropped a green item to the ground. Law enforcement recovered the item, which was a clear bag

containing 32 green tinted bags of what appeared to be crack cocaine. JONES was arrested. The suspect crack cocaine has been sent to the DEA laboratory for further analysis.

292. On April 4, 2014, at approximately 7:49 p.m., HARRIS, who was using Target Phone 3, received an incoming text (Call # 13941) REDMOND, who was using Redmond Phone 1. The text read, “black crown booked cro [JONES] road clean up put him in the car n took him to his slot [JONES was arrested].”

293. On April 4, 2014, at approximately 8:32 p.m., HARRIS, who was using Target Phone 3, received an incoming text (Call # 14029) REDMOND, who was using Redmond Phone 1. The text read, “Ready [for crack cocaine drop off and money pick up]”.

294. On April 4, 2014, at approximately 9:00 p.m., HARRIS, who was using Target Phone 3, received an incoming text (Call # 13988) from REDMOND, using who was using Redmond Phone 1. REDMOND texted, “just talk to cro [JONES] they charged him wit a delivery [JONES was charged with delivery of a controlled substance]”.

h. PATRICIA NEAL, a/k/a “Trish”

295. PATRICIA NEAL is a street-level crack cocaine seller for the Herndon DTO drug spot located at Jackson and Kilbourn.

January 20, 2014 – NEAL Arrested for Possession of a Controlled Substance at Congress and Kilbourn

296. On January 20, 2014, officers observed NEAL engage in what appeared to be a hand-to-hand transaction. Officers approached NEAL, who stated, “I got rocks [crack cocaine] in my hand.” NEAL then opened her right hand and displayed two clear plastic bags, each

containing a white rock-like substance that appeared to be crack cocaine. The suspect crack cocaine has been sent to the DEA laboratory for further analysis.

Intercepted telephone calls and surveillance establish NEAL's role as a street seller for the HERNDON DTO

297. On April 7, 2014, at approximately 7:56 a.m., GREEN, using Target Phone 2, had a conversation (Call # 44392) with NEAL, who was using telephone number (773) 993-7577. An unknown male answered the phone, and GREEN asked to speak to "Trish [NEAL]." During the call, GREEN stated, "Hey Trish bring one more out to this gray car [supply additional crack cocaine to an individual in a gray car]." NEAL responded, "Alright here I come."

298. On April 15, 2014, at approximately 3:45 p.m., GREEN, using Target Phone 2, had a conversation (Call #47757) with NEAL, who was using telephone number (773) 226-2324 ("Neal Phone 1").¹⁷ During the call, NEAL stated, "Hey, it's Trish." GREEN stated, "What up?" NEAL stated, "I got 140 [\$140 in drug proceeds] and 8 left [8 bags of crack cocaine remaining to sell]. I will hollar at you in a minute." GREEN replied, "Alright I'm sittin' right here by the house."

299. On April 15, 2014, at approximately 5:29 p.m., GREEN, using Target Phone 2, had a conversation (Call #47805) with NEAL, who was using Neal Phone 1. During the call, NEAL stated, "You want to see what I got right now [receive money from NEAL's crack

¹⁷ On April 25, 2014, officers conducted a field interview of NEAL. During this interview, she told officers her name was "Trish." These officers looked at known mug shots of NEAL and concluded that "Trish" was NEAL. During this interview, officers called Neal Phone 1. A phone on the ground between NEAL and CAUIRECE HERNDON rang. Officers asked them whose phone it was, and they both said it was their phone. However, since the user of the phone is a female, NEAL is more likely the user. Moreover, the officers that conducted this interview compared NEAL's voice to the voice of the user of Neal Phone1 and concluded that NEAL was its user. NEAL Phone 1 is a conglomeration of phones on which NEAL's voice was identified.

cocaine sales]?” GREEN responded, “Yeah, bring it [the drug proceeds] to me, I’m right in front of Boochie house.”

300. On April 15, 2014, at approximately 6:02 p.m., GREEN, using Target Phone 2, had a conversation (Call #47819) with NEAL, who was using Neal Phone 1. During the call, GREEN stated, “Yeah, why you give him 180 [\$180 in drug proceeds] I thought you say you had 200 [\$200 in drug proceeds]?” NEAL stated, “No, I say I only had 180 [\$180] yesterday when I pulled up.” GREEN stated, “Alright.” NEAL stated, “ I just I just bring I get you another dub [\$20].”

301. On April 15, 2014, at approximately 6:02 p.m., GREEN, using Target Phone 2, had a conversation with NEAL, who was using Neal Phone 1. During the call, NEAL stated, “Uhm I got uhmm 20 dollars and I don’t know what I’m gonna do with these little ass bags here . . . [NEAL had \$20 for GREEN but was complaining about the size of some of the bags in her pack of crack cocaine].” Later in the call, GREEN stated, “Come down here and tell me that cause I hate when ya’ll talk on my phone like that I’m right here at the end of the alley [GREEN wanted to discuss the drug proceeds in person with NEAL to avoid detection by law enforcement].” NEAL responded, “Ok here I go.”

302. On April 27, 2014, at approximately 9:36 a.m., GREEN, using Target Phone 2, had a conversation (Call #54198) with NEAL, who was using phone number Neal Phone 1. During the call, NEAL stated, “Man what what’s up how you get this is only a twenty seven [the pack of crack cocaine GREEN provided her had only 27 bags of crack cocaine in it].” GREEN stated, “Hello?” NEAL repeated, “Yeah a I’m telling you um right this ain’t nuthin but twenty seven [27 bags of crack cocaine].” GREEN asked, “That’s only twenty seven?” NEAL stated,

“Yeah.” GREEN stated, “Go on my shit, what’s up joe, just, just gimmie two hundred [just pay \$200 for the pack of crack cocaine].” NEAL responded, “Okay.”

303. On May 11, 2014, at approximately 11:04 a.m., GREEN, using Target Phone 2, had a conversation (Call #63269) with NEAL, who was using Neal Phone 1. During the call, GREEN stated, “I’m right here now the, the police is pulling off. Just stay right there. I’m finna walk back there [GREEN will bring NEAL more crack cocaine to sell when the police leave the area].” NEAL responded “Okay.” GREEN stated, “Finna pull his ass over, boy [the police were going to pull someone over].” NEAL stated, “That’s why I ain’t want to be on the front. That’s why I’d rather walk [NEAL did not want to be seen selling crack cocaine in front of the house].”

304. On May 11, 2014, at approximately 11:13 a.m., GREEN, using Target Phone 2, had a conversation (Call # 63272) with NEAL, who was using Neal Phone 1. During the call, GREEN stated, “Hey Trish, I’m finna send somebody down there [GREEN is directing a customer to NEAL to purchase crack cocaine].” NEAL responded, “Okay.”

305. On May 11, 2014, at approximately 11:15 a.m., GREEN, using Target Phone 2, had a conversation (Call #63277) with NEAL, who was using telephone number Neal Phone 1. During the call, GREEN stated, “Right, I see he ain’t got nobody to fuck with. Hold on. I’m sitting right here with a guy. He want one [one bag of crack cocaine]. But I ain’t, I ain’t gonna let him pull down there yet until I see where this Tahoe [police vehicle] at. Just stay on the phone [GREEN had a crack cocaine customer that wants one bag and he wanted NEAL to serve it to him, but he didn’t want to direct the customer to NEAL until he saw where the police went.]” NEAL responded “Okay.” GREEN then stated, “Aight hurry up come to the back with one [one bag of crack cocaine] cause they coming back around. Go. Go straight out. He pulling by the

alley right now. Just hurry up and hit him and go back in. Stay on the phone, Trish. Hello?”

NEAL replied, “Yeah” and “okay.”

4. The DTO’s Backup Suppliers: ZAMUDIO, RUSSELL, and MARION

306. As detailed in great lengths above, HERNDON is the main supplier to his DTO. However, the investigation has revealed that when the prices of HERNDON’s suppliers are too high, DTO members obtain cocaine from ZAMUDIO, RUSSELL, and MARION

a. EDUARDO ZAMUDIO

ZAMUDIO Wire Intercepts Relating to Supplying DTO with Cocaine

307. As discussed above, when HERNDON does not have crack cocaine to supply the DTO, HARRIS attempts to obtain powder cocaine from ZAMUDIO, which HARRIS converts into crack cocaine.¹⁸ Below are a sampling of intercepted phone calls between HARRIS and ZAMUDIO, during which HARRIS and ZAMUDIO discussed ZAMUDIO supplying HARRIS with cocaine.

¹⁸ On April 15, 2014, officers conducted an investigatory stop of ZAMUDIO. During this stop, ZAMUDIO self-identified as ZAMUDIO. ZAMUDIO subsequently produced a State of Illinois Identification Card stating that that he was ZAMUDIO and listing his address as 5728 S. Troy Avenue, Chicago, Illinois (**Search Location F**). ZAMUDIO related to the enforcement officers that he was the owner of the car wash located at 4542 W. Cermak Avenue (**Search Location B**). The law enforcement officers who conducted this stop compared the likeness of ZAMUDIO to the likeness of the individual who sold CS-5 heroin on multiple occasions and concluded the seller to be ZAMUDIO. In addition, agents compared the voice of ZAMUDIO to the voice of the user of the various phones attributed to ZAMUDIO herein, and concluded ZAMUDIO to be the user of these phones. Further, on April 16, 2014, CS-5, while conducting a recorded undercover purchase of marijuana with ZAMUDIO at the Car Wash, ZAMUDIO stated, “And yesterday I got pulled over by the cops man. And I got my license suspended bro so man g I was fucking shitting bricks yesterday man like bullshit aside.” ZAMUDIO has used multiple phones during this investigation. For all calls discussed herein, officers determined that ZAMUDIO was the user of that particular phone by: (1) comparing the voice of the user of the phone to ZAMUDIO’s voice as captured on the undercover recordings discussed herein; and (2) by comparing the voice of the user of the phone to the voice fo ZAMUDIO heard during the April 15, 2014 traffic stop.

308. On April 11, 2014, at approximately 8:55 p.m. (Call #16468), HARRIS, who was using Target Phone 3, received an incoming text from ZAMUDIO, who was using telephone number (872) 803-6308 ("Zamudio Phone 3"). This message read, "If u want to switch that cuz bring it new rims [ZAMUDIO has a new batch of cocaine]."

309. On April 12, 2014, at approximately 9:49 a.m. (call #16924), HARRIS, who was using Target Phone 3, had a phone conversation with ZAMUDIO, who was using Zamudio Phone 3. During this conversation, HARRIS stated, "Might try to uh, call the old man [HERNDON], so that this morning I might, see what's up with him." ZAMUDIO stated, "The whole full detail [kilogram of cocaine]?" HARRIS replied, "Uh, what's up with Chevy [cocaine], you still he ain't." ZAMUDIO then stated, "Oh, oh oh okay, I know what you're saying, okay."

310. On April 12, 2014, at approximately 5:37 p.m. (Call # 17028), HARRIS, who was using Target Phone 3, sent a text message to ZAMUDIO, who was using Zamudio Phone 3. This message read, "25 points need to return [HARRIS needed to return a portion of the narcotics he received from ZAMUDIO because they were poor quality]."

311. On April 30, 2014, at approximately 3:30 p.m. (Call #25857), HARRIS, who was using Target Phone 3, had a conversation with ZAMUDIO, who was using Zamudio Phone 3. During that conversation, ZAMUDIO stated, "Where you be at?" HARRIS replied, "I'm out going to get my workers and drop their assess off." ZAMUDIO replied, "I am already here on Pulaski, there's a little traffic light here on 35th [the cost of a kilogram of cocaine is \$35,000]." HARRIS replied, "Alright."

312. On April 30, 2014, at approximately 3:30 p.m. (Call #25858), HARRIS, who was using Target Phone 3, had a conversation with ZAMUDIO, who was using Zamudio Phone 3.

During this conversation, ZAMUDIO stated, “I gotta um we were doing a point, but these dumb ass fucking bought to me two of them. You know what I’m saying? They were the same ones so I’m waiting for them to switch [brought cocaine and heroin].” HARRIS replied, “Yeah.” ZAMUDIO stated, “Yeah, I do got them but, those and the ones that you said are no good. You know what I’m saying?” Later, ZAMUDIO stated, “Different details so the bitch, so the girl made a mistake so now they are waiting on him to come back to the office and give me a switch [to switch out the kilograms].” Later in the conversation ZAMUDIO tells HARRIS, “Text me the difference so I can tell him how much we need, you know what I’m saying [How much HARRIS will pay for a kilogram of cocaine]?”

313. On April 30, 2014, at approximately 3:30 p.m. (Call #35859), HARRIS, who using Target Phone 3, sent a text message to ZAMUDIO, who was Zamudio Phone 3. This text read, “Got like nine for a half if they would go [HARRIS would pay ZAMUDIO \$9,000 toward half a kilogram of cocaine with the remainder to be paid on credit].”

314. On May 6, 2014, at approximately 7:41 p.m. [Call #39324], HARRIS, who was using Target Phone 3, had a conversation with ZAMUDIO, who was using Zamudio Phone 3. During this conversation, HARRIS asked, “You good with the Chevy [cocaine].” ZAMUDIO replied, “Yeah . . . okay, I’ll see you in the morning with the Oldsmobile [heroin].”

315. On May 17, 2014, at approximately 4:52 p.m. (Call #36018), HARRIS, who was using Target Phone 3, had a conversation with ZAMUDIO, who was using Zamudio Phone 3. During this conversation, HARRIS stated, “I’m fitting to have [Individual One] come and get it [narcotics].” ZAMUDIO responded, “I got two, give him both? You know what I’m saying, it was one for you, one for him, right?” HARRIS replied, “Naw, just give him both [cocaine and

heroin – the cocaine is for HARRIS and the heroin is for Individual One, who is a major heroin dealer].

July 4, 2014: ZAMUDIO Sells HARRIS 1 Kilogram of Cocaine, Which HARRIS Converts to Crack Cocaine and the DTO Members for Sale on Spots

316. On June 28, 2014, at approximately 8:17 a.m. (Call # 1839), HARRIS, who was using telephone (312) 678-8766 (“Target Phone 6”), placed an outgoing call to ZAMUDIO, who was using phone number (630) 850-0297 (“Zamudio Phone 19”). During this conversation, ZAMUDIO stated, “Well my guy be good, I just talked to him last night when I called you, he said were back rolling with no bullshit by Monday, bro [ZAMUDIO’s source would have cocaine by Monday].” HARRIS replied, “Alright.” ZAMUDIO stated, “Yeah, he just told me right now, he’s like ‘I ain’t gonna get you tomorrow,’ he said Monday I’ll be good [ZAMUDIO’s source would have cocaine on Monday].”

317. On July 3, 2014, at approximately 7:49 p.m. (Call #2528), HARRIS, who was using Target Phone 6, had a conversation with ZAMUDIO, who was using Zamudio Phone 19. During this conversation, ZAMUDIO stated, “What up, I’m a call you from the other phone right now [ZAMUDIO will call HARRIS from a different telephone].” HARRIS replied, “Alright”.

318. On July 3, 2014, at approximately 7:50 p.m. (Call #2529), HARRIS, who was using Target Phone 6, received an incoming text message from ZAMUDIO, who was using phone number (312) 678-8766 (“Zamudio Phone 20”). This text read, “36,500 [a kilogram of cocaine would cost HARRIS \$36,500].”

319. On July 3, 2014 at approximately 8:58 p.m. (Call #2541), HARRIS, who was using Target Phone 6, received an incoming call from GREEN, who was using phone number

(312) 259-5564 (“Green Phone 3”). During this conversation, HARRIS stated, “Shit, I might be calling you in the morning man [as discussed below, the DTO had been out of drugs for several weeks. HARRIS was telling GREEN that he might be calling him because he would have crack cocaine to supply].” GREEN replied, “Hell yeah, that’s what I’m talking about [GREEN is excited to return to work].” HARRIS told GREEN, “I’m gonna let you know.”

320. On July 4, 2014, at approximately 8:01 a.m. (Call #2566), HARRIS, who was using Target Phone 6, had a conversation with ZAMUDIO, who was using Zamudio Phone 20. During the conversation, ZAMUDIO stated, “Que Paso, hey a little different but, not a lot bro my guy just called me bro [ZAMUDIO’s source just contacted him and the price of the kilogram of cocaine is different]. I applied for that thing on it’s on Pulaski and thirty seven bro and he’s on his way over there right now to, to get it detailed [the price of the kilogram changed to \$37,000]”. HARRIS replied, “Him?” ZAMUDIO stated, “Yeah he says uh, he says he says uh that they changed it on his ass right now. I just called him I been calling since six in the morning. I haven’t even slept yet bro.” HARRIS replied, “Yeah you said who?” ZAMUDIO stated, “Uh, I’m going right now to the shop [the Car Wash located at 4542 West Cermak Road (**Search Location B**)], I’ll be there like for an hour so he’s [ZAMUDIO’s supplier] on his way over there to try and do something and let me know.” HARRIS stated, “Yeah I’m gonna come there whenever you call me nigga, what you talking about?” ZAMUDIO replied, “Yeah, well come on but I mean, I be at the shop in like I be there exactly ten minutes right now so we can square, square up everything [ZAMUDIO would talk to HARRIS in person at his car wash].”

321. At approximately 8:28 a.m., surveillance observed HARRIS exit his residence located at 2758 West Adams Street (**Search Location A**). At approximately 8:41 a.m.,

surveillance observed HARRIS arrive at and enter the Car Wash located at 4542 West Cermak Avenue (**Search Location B**). At approximately 9:10 a.m., HARRIS exited the Car Wash and returned home.

322. On July 4, 2014 at approximately 9:24 a.m. (Call #2579), HARRIS who was using Target Phone 6, had a conversation with ZAMUDIO, who was using Zamudio Phone 20. During this conversation, ZAMUDIO stated, “What up, I’m gonna be right there like not that far away from where we always meet at right there by the airplanes, that’s safe, it’s safe, it’s good bro.” HARRIS stated, “Shit let me know.” ZAMUDIO stated, “Alright, I’m texting you the address so you can come this way but it’s good, I’m telling you it’s good, it’s good I guess I been riding around you know what I’m saying.”

323. On July 4, 2014 at approximately 9:32 a.m. law enforcement observed ZAMUDIO in a black Mazda, Illinois plate V640734 arrive outside of 5728 South Troy and walk through the yard. This car is registered to ZAMUDIO at the Troy address. Surveillance observed ZAMUDIO puts a black case on the side of the garage.

324. On July 4, 2014 at approximately 9:47 a.m. (Call #2582), HARRIS, who was using Target Phone 6, had a conversation with Individual Two, who was using phone number (312) 933-5517. During this conversation, Individual Two stated, “Hey um, he [ZAMUDIO] said just to wait there. Don’t leave and don’t do a lot of movement ya know? He said uh text an address in 10 minutes.” HARRIS replied, “Uh huh”. Individual Two stated, “He’s going to text you the address in ten minutes.”

325. On July 4, 2014, at approximately 10:14 a.m. (Call #2593), HARRIS, who was using Target Phone 6, had a conversation with Individual Two, who was using phone number

(312) 933-5517. Individual Two stated, “Hey, he said uh, he said to meet him [ZAMUDIO] over there by the dirt, you know where.” HARRIS replied, “Alright.” Individual Two stated, “He said everything cool over there.” [Individual Two is referring to him and ZAMUDIO conducting counter surveillance to law enforcement]. HARRIS replied, “Alright.” Individual Two then stated, “That’s why he took so long, he had to double check you know where to go through right?”

326. On July 4, 2014 at approximately 10:19 a.m. (Call #2595), HARRIS, who was using Target Phone 6, received an incoming text from ZAMUDIO, who was using Zamudio Phone 1. This message read, “43 Cicero make leftu se me mak sure u look in u mirrors u knw [ZAMUDIO directed HARRIS to 43rd Street and Cicero Avenue and told HARRIS to be on the lookout for law enforcement surveillance].”

327. On July 4, 2014, at approximately 10:20 a.m., surveillance observed HARRIS leave his residence at 2758 W. Adams (**Search Location A**) and drive away in a red BMW, Illinois license plate 3403BH. He then received a call from ZAMUDIO, who provided him directions.

328. On July 4, 2014, at approximately 10:36 a.m., surveillance observed HARRIS pull into a construction yard at approximately 4300 S. Keating Avenue, which is one block over from Cicero. Shortly thereafter, surveillance observed HARRIS meet with ZAMUDIO. Surveillance then observed HARRIS and ZAMUDIO leave the area in separate vehicles. Based on the aforementioned calls, agents believe that HARRIS paid for and received a kilogram of cocaine from ZAMUDIO during this meeting.

329. On July 4, 2014 at approximately 12:29 p.m. (Call #2625), HARRIS who was using Target Phone 6, had a conversation with GREEN, who was using GREEN Phone 2. During this conversation, GREEN asked, “What up?” HARRIS replied, “Yep shit. We ready [to send narcotics to the spots], I’m gonna get you in like uh, 20 minutes [HARRIS would call GREEN in 20 minutes].” GREEN replied, “Yeah, I’m here [the spot at 316 S. Kilbourn Avenue (**Search Location G**)] already, I’m sitting over here.”

330. On July 4, 2014, at approximately 12:45 p.m., surveillance observed HARRIS arrive at 2758 W. Adams (**Search Location A**) and enter the residence. Based on the aforementioned calls, agents believe that HARRIS converted the kilogram of powder cocaine into crack cocaine in his residence.

331. On July 4, 2014, at approximately 2:54 p.m. (Call #2648), HARRIS who was using Target Phone 6, had a conversation with GREEN, who was using GREEN Phone 2. During this conversation, HARRIS asks GREEN, “Where you at?” GREEN replied, “Sitting on Miss Diane’s porch [officers observed GREEN’s car near 322 South Kilbourn].” HARRIS stated, “Shit I’m trying head that way.”

332. On July 4, 2014, at approximately 3:09 p.m., surveillance observed HARRIS exit the rear of his residence at 2758 W. Adams (**Search Location A**) enter the garage, then exit the garage driving a black Mitsubishi SUV.

333. On July 4, 2014, at approximately 3:11 p.m. (Call #2651), HARRIS who was using Target Phone 6, had a conversation with GREEN, who was using GREEN Phone 2. During this conversation, HARRIS asked GREEN, “Yeah, um where you at Joe?” GREEN replied, “Yeah, sitting right here, I’m on Diane porch.” HARRIS stated, “Meet me on Congress.”

GREEN replied, "By the J or . . . ?" HARRIS stated, "By four fifth four fifth by Congress [the 4500 block of West Congress Avenue]."

334. On July 4, 2014, at approximately 3:15 p.m., (Call #2653), HARRIS who was using Target Phone 6, had a conversation with GREEN, who was using GREEN Phone 2. During this conversation, HARRIS asked, "What kind of car you in?" GREEN replied, "I'm uh in my white truck. I'm across the street." HARRIS replied, "I see you right there".

335. On July 4, 2014, at approximately 3:15 p.m., surveillance observed HARRIS and GREEN meet in the 4500 block of West Congress. Based on the aforementioned calls, agents believe that HARRIS distributed crack cocaine to GREEN for sale on the spot during this meeting. Agents had performed surveillance at the spot for several days prior to this meeting and had noticed no activity until after this meeting, meaning that the spot was dry until this meeting took place.

336. Surveillance observed GREEN leave the meeting and, at approximately 3:21 p.m., arrive on the 300 block of South Kilbourn and drive into the south alley of Jackson near the spot located at 316 S. Kilbourn Avenue (**Search Location G**). Shortly thereafter, surveillance observed the spot being manned by various DTO members including RICHARDSON, and observed customers purchase from the spot. Officers stopped one of the spot customers exiting the spot after they observed the customer engage in a hand-to-hand transaction with RICHARDSON. The customer was in possession of a baggie containing a small quantity of what appeared to be crack cocaine. The customer stated that workers at the spot were handing out crack cocaine for free to regain their customer base.

337. On July 4, 2014, at approximately 4:49 p.m. (Call #2676), HARRIS, who was using Target Phone 6, received an incoming text ZAMUDIO, who was using Zamudio Phone 20. This message read, “Short 980 on the ticket [HARRIS was short \$980 for the kilogram of cocaine].”

338. On July 4, 2014 at approximately 4:49 p.m. (Call #2675), HARRIS who was using Target Phone 6, had a conversation with GREEN, who was using GREEN Phone 2. During this conversation, HARRIS asked, “Are you cool?” GREEN replied, “Yeah, I’m good.” HARRIS replied, “Alright.” GREEN stated, “Actually, they like that shit too [the spot customers liked quality of the crack cocaine].”

339. On July 4, 2014 at approximately 8:43 p.m. (Call #2723), HARRIS who was using Target Phone 6, had a conversation with GREEN, who was using GREEN Phone 2. During this conversation, GREEN stated, “I’m on these last 2. I got one on me and on put up, Um, Diane wanted to know if you want something to eat [GREEN is referring two having two packs of 30 rocks of crack cocaine left to sell at the spot, one is with him and he stored the other one at the spot house, 316 S. Kilbourn]. HARRIS replied, “Naw, I’m decent [no need for Diane to make HARRIS a meal].”

340. Over the next several days, law enforcement performed surveillance and monitored wire intercepts over HARRIS’s phone. The same pattern emerged that was discussed above. Approximately three times per day, HARRIS would leave his house, where he stores crack cocaine, meet with either GREEN or O’LEARY, and supply them with crack cocaine. In turn, GREEN or O’LEARY would give the crack cocaine to various street-level workers, who

would sell it to retail customers. Surveillance observed several hand-to-hand-transactions and seized or attempted to seize drugs from spot customers.

July 16, 2014: HARRIS Arranges to Purchase an Additional Kilogram of Cocaine from ZAMUDIO

341. On July 16, 2014 at approximately 4:13 p.m. (Call #4107), HARRIS, who was using Target Phone 6, had a phone conversation with ZAMUDIO, who was using phone number (312) 918-9481 (“Zamudio Phone 21”). During this conversation, ZAMUDIO commented, “Ah, shit let me call this guy [cocaine supplier] and see if he’s ready.” HARRIS replied, “Well shit, maybe for tomorrow, you know what I’m saying?” ZAMUDIO replied, “Yeah, let me call him and I’ll text you the address.”

342. On July 16, 2014 at approximately 7:55 p.m. [Call #4146], HARRIS, who was using Target Phone 6, had a phone conversation with ZAMUDIO, who was using Zamudio Phone 21. During this conversation, ZAMUDIO stated, “What, what up? Uh. He probably be ready by yeah like Pulaski and fucking 36th” [\$36,000 for a kilogram of cocaine].” Later in the conversation, ZAMUDIO stated, “Oh, okay yeah. Call me when you down then. Tomorrow I’m going to be over there.” HARRIS replied, “Yeah, we be down for tomorrow for sure.”

343. On July 17, 2014 at approximately 11:21 p.m. [Call #4167], HARRIS, who was using Target Phone 6, had a phone conversation with ZAMUDIO, who was using Zamudio Phone 21. During this conversation, ZAMUDIO stated, “This guy stated it is not going to be until tomorrow morning.”

344. On July 18, 2014 at approximately 2:54 p.m. [Call #4332], HARRIS, who was using Target Phone 6, had a phone conversation with ZAMUDIO, who was using Zamudio

Phone 21. During this conversation, HARRIS stated, ‘Right here getting my hair cut.’ ZAMUDIO responded, ‘Fucking call me when you are done, we’ll hook up.’

345. At approximately 3:13 p.m., surveillance observed HARRIS exit a barbershop. At approximately, Surveillance followed HARRIS to ZAMUDIO’s Car Wash, which was located at 4542 West Cermak Road (**Search Location B**). HARRIS entered the Car Wash at approximately 4:27 p.m.

346. The investigation revealed that HARRIS and ZAMUDIO never consummated this transaction because they were alerted to the presence of police surveillance. Instead, as discussed further below, HARRIS later purchased crack cocaine from ROBERT RUSSELL.

ZAMUDIO Is Primarily a Heroin Wholesaler

347. As discussed below, ZAMUDIO told CS-5¹⁹ that he deals mostly in heroin, rather than cocaine, because there is higher profit margin in heroin. One of ZAMUDIO’s main heroin customers is Individual One. Below are a sample of calls between ZAMUDIO and Individual One discussing the sale of heroin.

348. On May 17, 2014, at approximately 4:52 p.m. (call #36018), HARRIS, who was using Target Phone 3, had a phone conversation with ZAMUDIO, who was using Zamudio Phone 3. During this conversation, ZAMUDIO asked, ‘‘Are you coming [to get some heroin]?’’ HARRIS replied, ‘‘No, I’m fittin’ to have Black [INDIVIDUAL ONE] come get it.’’ ZAMUDIO

¹⁹ CS-5 has been a confidential source for ATF for approximately 8 years. He/she has cooperated on a number of ATF investigations and his/her information has always proven reliable and it has been corroborated by a variety of means, including through wire interceptions and consensual recordings. CS-5 has no relationship to the Gangster Disciples street gang or the HERNDON DTO and as such cannot provide any relevant background information. CS-5 is cooperating in exchange for monetary compensation and to date CS-5 has been paid approximately \$3,100 for his/her participation in this investigation. CS-5 has two previous convictions for narcotics-related offenses.

asked, "I got to give him both?" HARRIS answered, "Yeah." ZAMUDIO asked, "You know what I'm saying, it is one for you, one for him, right?" HARRIS answered, "Naw, just give him both." ZAMUDIO stated, "Call me when you are out front." HARRIS stated, "Sixty [grams of heroin]." ZAMUDIO stated, "No, no, no, that's, I just got them and then you call me, let me know when you are good to go." HARRIS stated, "I know, sixty." ZAMUDIO stated, "Oh, okay."

349. On June 13, 2014, at approximately 5:21 p.m. (call #437), ZAMUDIO, who was using telephone number (630) 926-3570 ("Target Phone 7"), had a phone conversation with Individual, who was using telephone number (312) 834-6932 ("Target Phone 5"). During this conversation, ZAMUDIO stated, "Yo, Black [Individual One]." Individual One replied, "Huh?" ZAMUDIO stated, "Yeah, is that Pulaski and 130th [130 grams of heroin]? Is that what you are trying to get?" Individual One replied, "Yeah, yeah." ZAMUDIO stated, "You ready now so I can tell them [is Individual One ready to be resupplied with heroin]?" Individual One replied, "Yeah, I'm coming, I'm on my way back." At approximately 4:53 p.m., surveillance observed Individual One arrive at and enter the Car Wash. Individual One departed the Car Wash at approximately 6:20 p.m. and drove back the vicinity of Garfield Park and met with a narcotics associate.

350. On June 14, 2014, starting at approximately 10:54 a.m., at the direction of agents, CS-5 exchanged a series of text messages with ZAMUDIO, who was using Target Phone 7. CS-5 wrote, "What's good." ZAMUDIO responded, "Nada not wrkin 2day se u mond [ZAMUDIO was not selling narcotics that day and asked CS-5 to meet him on Monday]." CS-5 replied, "I let that thing [USFA zipgun] go for \$700 last nite I need some more ASAP [CS-5 had purportedly

sold the gun he bought for ZAMUDIO and wanted to buy more guns].” ZAMUDIO wrote, “Left i cal u wen i get bak.” CS-5 wrote, “Dude I need that [the AR-15 rifle] stop playing.” ZAMUDIO responded, “He dnt hav nada yet he sold that [ZAMUDIO’s source had already sold the AR-15 rifle to another buyer].”

351. On June 14, 2014, at approximately 2:12 p.m. (call #619), ZAMUDIO, who was using Target Phone 7, had a phone conversation with Individual One, who was using Target Phone 5. During this conversation, ZAMUDIO asked, “You going to be here at three o’clock for Pulaski and 140 [140 grams of heroin].” Individual One replied, “Okay, I’ll be there.” At approximately 2:12 p.m. (Call #620), ZAMUDIO, who was using Target Phone 7, had a phone conversation with Individual One, who was using Target Phone 5. During this conversation, Individual One asked, “You can make it 155 [155 grams of heroin instead of 140]?” ZAMUDIO responded, “Alright, well you got to let me know one time man cause these guys [ZAMUDIO’s heroin suppliers] get made if I call them.” Individual One stated, “That’s it, 155.” At approximately 3:37 p.m., surveillance observed Individual One arrive and enter the Car Wash. At approximately 4:02 p.m., officers observed Individual One leave the Car Wash.

ZAMUDIO Sold Heroin to CS-5

352. On or about April 9, 2014, at the direction of law enforcement, CS-5, pretending to be a drug dealer, took his car to the Car Wash, where he met with ZAMUDIO. HARRIS was also present at the Car Wash and was present during portions of ZAMUDIO’s conversation with CS-5. This meeting was captured on audio/video recording devices. During this meeting, CS-5 showed ZAMUDIO a “trap,” or hidden compartment in his car that CS-5 purportedly used to transport narcotics. After ZAMUDIO saw the trap, he and CS-5 had a discussion concerning

ZAMUDIO's ability to supply marijuana, cocaine, and heroin to CS-5. During the conversation, ZAMUDIO asked, "Are you trying to get fucking weed?" CS-5 responded, "No, I do coke. . . I can move it." ZAMUDIO responded, "Everybody got it man. West side, it's the heroin [that makes more money]." CS-5 stated, "I do my shit up near Rockford." ZAMUDIO then stated, "I got people up in Rockford." ZAMUDIO then stated that he only likes to deal in narcotics with fellow Mexicans because, "My guy just got popped with fifteen fuckin' years cause the nigger he was working with was a fucking undercover fed. . . So I'll be honest with you man, I'm real careful with shit, you know what I'm saying." Later, ZAMUDIO stated, "I'm not a weed man. . . I don't work for no hundred dollars [implying that he sold cocaine, which has higher margins]." Later, talking about heroin, ZAMUDIO stated, "My price, imma give it to you is gonna be like okay let's do this shit. . . I'll give you a whole thing [one kilogram of heroin] for sixty-four [\$64,000]." Later, ZAMUDIO stated, "Imma be honest with you like when I get the white cheese [cocaine] or whatever it is, I'll let you know. They'll go between thirty-three [\$33,000] and thirty-four [\$34,000]." Toward the end of the meeting, CS-5 provided ZAMUDIO with his phone number and then ZAMUDIO called CS-5's phone. Agents examined the phone and found that the number was 708-200-5613 ("Zamudio Phone 2"). ZAMUDIO later stated, "Imma be honest with you man, I'm a very, very, very, very, very, very paranoid motherfucker, you know what I am saying [ZAMUDIO is scared of the police and that CS-5 might be an informant]." Later, talking about the quality of the heroin, ZAMUDIO stated, "It's one hundred, you gotta see the quality, gotta be cement [in a brick form, not a lose powder]. That shit eighty, eighty-five [percent pure] man. . . the price that I'm giving you, I'm gonna give it to you at sixty-four [\$64 per gram]. In the street it goes for a hundred [\$100 per gram]."

353. Over the next several weeks, CS-5 conducted a series on controlled buys with ZAMUDIO at the Car Wash located at 4542 West Cermak Road (**Search Location B**). All of these buys were captured on audio and video recording devices, were corroborated by surveillance, and done under the control and direction of law enforcement agents. The buys include: (1) April 16, 2014 controlled purchase of approximately 146 grams of marijuana; (2) May 1, 2014 controlled purchase of 27 grams of heroin; (3) May 7, 2014 controlled purchase of approximately 107 grams of heroin; (4) May 13, 2014, controlled purchase of 86 grams of heroin; and (5) June 13, 2014 purchase of a .22 caliber pistol.²⁰ The May 7, 2014 and May 13, 2014 controlled purchases are further described below.

May 7, 2014: ZAMUDIO Sells CS-5 107 Grams of Heroin (Count Four)

354. On May 6, 2014, at approximately 2:10 p.m., CS-5 placed a consensually recorded call to ZAMUDIO, who was using Zamudio Phone 3. During this conversation, CS-5 stated, “Alright, I got something for you though. Aw, you remember the car [27 grams of heroin purchased on May 1, 2014]. I got from you though?” ZAMUDIO responded, “Ya, ya, ya, ya.” CS-5 stated, “Alright I need three of those [75 grams of heroin]; you know remember what we talked about right?” ZAMUDIO replied, “Aw, ya, ya, ya, you probably gonna you probably gonna have to find the receipts from the exchange of the plates for Pulaski and like 50th [50 grams of heroin], haw.” CS-5 stated, “Na, it’s I want 75 [grams of heroin].” ZAMUDIO responded, “Oh, okay okay.” CS-5 stated, “Ya, so you say you going to give a duplicate receipt

²⁰ During the June 13, 2014 recorded meeting, after selling CS-5 the pistol, ZAMUDIO commented, “He [ZAMUDIO’s gun supplier] have an AR-15 [assault rifle]. Right now he got an AR-15 and a nine [.9mm handgun] and a forty [.40 caliber hand gun] he could get you. What he got in his hand right now is an AR-15, nice and clean, \$1,300. You know cuz they \$2,200 at the store.”

for the 150 [a total of 150 grams of heroin, 75 to be paid up front, and 75 to be sold on credit].” ZAMUDIO stated, “hell ya, I understand.” ZAMUDIO then agreed and CS-5 agree to meet the following day on May 7, 2014 at the Car Wash located at 4542 West Cermak Road (**Search Location B**).

355. On May 7, 2014, at approximately 10:10 a.m., CS-5 placed a consensually recorded call to ZAMUDIO, who was using Zamudio phone 3. During this conversation CS-5 stated, “What’s up you good [ready with the heroin to sell to CS-5]?” ZAMUDIO responded, “Yea, come on.”

356. On May 7, 2014, at approximately 11:25 a.m., CS-5 met with agents, who searched him/her and his/her vehicle for contraband, none of which was found. CS-5 was equipped with audio/video recording devices and given \$4,800 in undercover buy funds. At approximately 11:29 am, CS-5 traveled, under surveillance, to the Car Wash, where he/she arrived at approximately 11:35 a.m. CS-5 then then entered the Car Wash (**Search Location B**) where he encountered ZAMUDIO.

357. At approximately 11:47 am, CS-5 and ZAMUDIO exited the car and entered CS-5’s vehicle. Once inside the car, CS-5 showed ZAMUDIO the buy money. ZAMUDIO responded by saying, “Alright cool, pull in and park. . . . just go in there real quick, I’ll put it in [the heroin].” CS-5 then began discussing with ZAMUDIO his/her reservation to going around to the side of the business. CS-5 stated, “I’m not going back there man.” ZAMUDIO responded, “Cuz, right here next to the fucking thing. Listen to what I’m telling you. If you trust me enough. Look, nobody there’s. I’m telling you exactly what I’m telling you. We’re doing this. It’s only me and you. But instead of me making (UI) business front, I know what I’m telling you. Don’t

take it negative, don't take it like something is going to happen. I'm not on that shit cuz. Just turn around, nothing is going to be there. If you feel somethin' [ZAMUDIO explaining that it is just him and CS-5 doing the heroin deal and there is no one else going to be there]."

358. At approximately 11:48 a.m., CS-5 pulled his/her vehicle to the side of the Car Wash. ZAMUDIO then exited CS-5's vehicle and, according to CS-5, walked over to an SUV located inside the Car Wash premises and retrieved something from the rear wheel well. ZAMUDIO then re-entered CS-5's vehicle. ZAMUDIO then handed CS-5 a baggie containing suspect heroin. ZAMUDIO asked, "They money there?" CS-5 then handed ZAMUDIO the buy money, stating, "Count that shit." ZAMUDIO responded, "You good. It's right here cuz. Hey look right here. Look at it. I'm opening it [the buy money] cause I thought you don't want me to be here. I don't know man, you're making me uncomfortable man." ZAMUDIO then exited the undercover vehicle. After exiting, ZAMUDIO stated, "You're straight. Put it up, hide that shit [the heroin] cuz." ZAMUDIO also stated, "I feel ya, I feel ya. But what I'm saying, like you know what I'm saying, we have to keep it real between each other. Check it out. My guys will put it right in there. You know put it in the fucking calculator [referring to checking the weight of the heroin out to make sure it was correct], text boom boom boom. Make sure you know what I'm saying, I'm a real guy G, I ain't not on the shit man." CS-5 responded, "But you said, look, second half 60, or the next time 62 [CS-5 was referring to the price of the heroin the next time they do business being \$62 instead of \$64 a gram]. ZAMUDIO stated, "Sixty two." CS-5 stated, "On this one?" ZAMUDIO responded, "On this one you come back. Man, trust me bro. I feel like there is something between us like we aren't giving the trust to each other, you know what I'm saying? I ain't going to run with money, you ain't going to run nothing. It's like you know

what I'm saying, we just have to be cool, as long as you ain't no law and I'm not law man, we're good. You don't think I'll be thinking twice like when you meet a new guy just because we ain't got shit doesn't mean we ain't on shit you know what I'm saying. This game went to a different level man, so I'm paranoid as well as your paranoid. But we just got to squash this shit because I just want to work with somebody that I can trust bro. You know what I'm saying? That's it." ZAMUDIO then entered the Car Wash and CS-5 traveled toward the pre-arranged meeting location.

359. At approximately 12:09 p.m., CS-5 arrived at approximately this location. Agents then searched CS-5's vehicle for the presence of contraband. Agents took possession of the recording devices and a plastic baggie containing suspect heroin. The suspect heroin field tested positive for heroin and weighed approximately 107 grams. It has been sent to the DEA laboratory for further testing.

360. Given that they expected to be given 150 grams of heroin and not 107, agents instructed CS-5 to contact ZAMUDIO. CS-5 then sent a text message to ZAMUDIO, which read, "Yo is this 150 [grams of heroin]. It looks small." ZAMUDIO replied via text, "chek 4 me." At approximately 12:30 pm, CS-5 received several phone calls from ZAMUDIO, but these calls were not answered. At approximately 12:31 pm, CS-5 placed a consensually recorded call to ZAMUDIO. During that conversation ZAMUDIO told CS-5 that he thought the agreement was for 100 grams of heroin, not 150 grams. ZAMUDIO told CS-5 that he would make up the difference at the next meeting.

May 13, 2014: ZAMUDIO Sells CS-5 86 Grams of Heroin

361. On May 12, 2014, at approximately 9:15 a.m., CS-5 placed a recorded phone call to ZAMUDIO. In summary, during this conversation CS-5 and ZAMUDIO agreed to meet the following day, May 13, 2014, so the CS-5 could get the 50 grams of heroin owed to him/her and CS-5 could pay ZAMUDIO for the previously fronted 75 grams of heroin.

362. On May 13, 2014, at approximately 9:22 am, CS-5 sent ZAMUDIO a text message that stated, “Yo can I come get that extra detail [heroin] this morning. I got that money I owe you on that last detail too.” ZAMUDIO responded in a text message, “com ready im here.” CS-5 responded in a text message, “Ok....I was around some ppl that’s why I didn’t pick call u in a sec tho.” ZAMUDIO replied, “My guy stated thers 80 left [80 grams of heroin] only then new company starts after so just bring some extra title [extra money for the extra 30 grams of heroin – meaning that ZAMUDIO would be giving CS-5 a total of 80 grams of heroin].”

363. On May 13, 2014, at approximately 11:45 a.m., CS-5 met with agents, who searched him/her and his/her vehicle for contraband, none of which was found. CS-5 was equipped with audio/video recording devices and given \$4,800 in undercover buy funds. CS-5 then traveled, under surveillance, to the Car Wash (**Search Location B**), where he/she arrived at approximately 12:09 p.m. ZAMUDIO exited the Car Wash and got into CS-5’s vehicle.

364. Once he was inside the vehicle, CS-5 had a conversation with ZAMUDIO. ZAMUDIO stated, “There’s only eighty [grams of heroin left], that’s it.” CS-5 commented, “You supposed to front me the fifty [grams of heroin].” ZAMUDIO replied, “That leaves you with thirty [an extra thirty grams of heroin].” CS-5 stated, “So, I kind of misunderstood what you were saying, he only got eighty left.” ZAMUDIO stated, “Ok.” CS-5 responded, “What I got

right here is for I owe you for twenty five [referring to extra twenty five grams of heroin that ZAMUDIO provided CS-5 on May 7, 2014].” ZAMUDIO replied, “Okay.” CS-5 stated, “And I was going to pay you for that fifty [referring to fifty grams of heroin so the CS-5 would be paying ZAMUDIO for a total of seventy five grams of heroin at \$64.00 a gram for a total of \$4,800.00].” ZAMUDIO responded, “Okay.” CS-5 stated, “See.” ZAMUDIO replied, “So that’s what you got there. So basically you’re only going to owe me thirty.” CS-5 stated, “Yea, I’m going to owe you for thirty [grams of heroin].” ZAMUDIO then stated, “I got the shit [heroin] inside, hold on.” ZAMUDIO then exited CS-5’s vehicle.

365. Surveillance observed ZAMUDIO enter the Car Wash (**Search Location B**). ZAMUDIO then exited the Car Wash and entered CS-5’s vehicle again. Upon re-entering the vehicle, ZAMUDIO handed CS-5 a baggie containing suspect heroin. ZAMUDIO stated, “There you go cuz, eighty right there.” CS-5 then handed ZAMUDIO the buy money. ZAMUDIO exited the vehicle and CS-5 then traveled back to the pre-arranged meeting location.

366. At approximately 12:12 p.m., CS-5 arrived at approximately this location. Agents then searched CS-5’s vehicle for the presence of contraband. Agents took possession of the recording devices and a plastic baggie containing suspect heroin. The suspect heroin field tested positive for heroin and weighed approximately 86 grams. It has been sent to the DEA laboratory for further testing.

b. ROBERT RUSSELL

367. On multiple occasions during this investigation, HARRIS purchased cocaine from RUSSELL when HERNDON and ZAMUDIO could not supply the drug spots.

March 24, 2014: RUSSELL Supplies HARRIS with 63 Grams of Cocaine

368. On March 24, 2014, at approximately 8:14 a.m. (Call #7446), HARRIS, who was using Target Phone 3, sent a text message to RUSSELL, who was using telephone number (312) 882-0508 (“Russell Phone 1”). This message read, “Need a ride on 63rd [HARRIS wanted 63 grams of cocaine].” RUSSELL replied via text (Call #7448), “Where you at?” HARRIS and RUSSELL then exchanged a series of texts where they agreed to meet after RUSSELL returned from housing court.

369. On March 24, 2014, at approximately 12:25 p.m., officers conducted a traffic stop on RUSSELL, who was driving a black GMC Yukon registered to RUSSELL. During this interview, RUSSELL self-identified as RUSSELL and told officers his phone number was Russell Phone 1. Officers who conducted this interview listened to calls made over Russell Phone 1 and determined RUSSELL to be its user. RUSSELL also stated that he lived at 547 North Lawler (**Search Location H**).

370. On March 24, 2014, at approximately 12:38 p.m. (Call #7556), HARRIS, who was using Target Phone 3, sent a text message to RUSSELL, who was using Russell Phone 1. This message read, “Waiting on bro he need a lift also sixty third [HARRIS’s customer may also want 63 grams of cocaine].” At approximately 1:22 p.m. (Call #7570), HARRIS sent a text to RUSSELL that read, “Im ready atteh was 4542 cermak [(**Search Location B**)].” At approximately 2:04 p.m. (Call #7587), HARRIS placed a call to RUSSELL, during which HARRIS stated, “I see you.” Surveillance observed HARRIS and RUSSELL in RUSSELL’s Yukon outside of the Car Wash at approximately 2:08 p.m. Agents believe that RUSSELL sold 63 grams of cocaine to HARRIS during this meeting.

July 19, 2014 and July 23, 2014: RUSSELL Supplies Harris with Cocaine

371. On July 19, 2014, at approximately 6:48 p.m. (Call #4457), after failing to obtain cocaine from ZAMUDIO as discussed above, HARRIS, who was using Target Phone 6, sent a text message to RUSSELL, who was using Russell Phone 1. This text read, “63 amg s class [HARRIS wanted 63 grams of cocaine].” At 6:48 p.m. (Call #4458), RUSSELL responded, “Yep.” At 7:11 p.m. (Call #4464), HARRIS asked, “u remember my location.” At 7:12 p.m. (Call # 4465), RUSSELL responded, “Yep on the way NOW.” At 7:40 p.m. (Call #4470), RUSSELL texted HARRIS, “Come On Out!”

372. On July 23, 2014, at approximately 2:24 p.m. (Call #5021), HARRIS, who was using Target Phone 6, had a conversation with RUSSELL, who was using RUSSELL Phone 1. During this conversation HARRIS stated, “I need to see you.” Based on the previous text messages from July 19, 2014 and the course and history of dealing between HARRIS and RUSSELL, agents believe that HARRIS wanted RUSSELL to supply him with 63 grams of cocaine. Later that day, at approximately 5:04 p.m. (Call #5052), HARRIS sent a text message to RUSSELL that read, “Waiting on u.” At 5:58 p.m. (Call #5078), RUSSELL responded, “15 min.”

373. At approximately 6:23 p.m. (Call #5087), RUSSELL texted HARRIS, “Come on out.” At approximately 6:30 p.m., surveillance observed RUSSELL and HARRIS engaged in a hand to hand transaction on HARRIS’s front porch located at 2758 West Adams (**Search Location A**). Agents believe that RUSSELL sold 63 grams of cocaine to HARRIS during this meeting.

July 24, 2014: Officers Seize 63 Grams of Cocaine From RUSSELL and then RUSSELL Supplies HARRIS with 63 Grams of Cocaine (Count Five)

374. On July 24, 2014, at approximately 5:25 p.m. (Call #5304), HARRIS, who was using Target Phone 6, sent a text message to RUSSELL, who was using Russell Phone 1. This message read, “Need to see you.” At approximately 5:30, HARRIS sent another text that read, “May go on a 125 bout seven oclock [HARRIS wanted to purchase 125 grams of cocaine around 7:00 p.m.]” At 5:51 p.m. (Call #5309), HARRIS sent another text message that read, “Capesh [does RUSSELL agree to supply the cocaine]?” At approximately 5:53 p.m. (Call #5310), RUSSELL replied via text, “Capese [yes].” At approximately 6:46 p.m. (Call #5314), HARRIS sent a text to RUSSELL that read, “Im gonna stick with one ready though [HARRIS only wants one 63 gram quantity of cocaine instead of 125 grams].” RUSSELL responded, “K.”

375. On July 24, 2014, at approximately 8:37 p.m. (Call #5333), HARRIS, who was using Target Phone 6, had a conversation with RUSSELL who was using Russell Phone 1. During this conversation, HARRIS and RUSSELL agreed to meet in the lower level of a parking garage at a dialysis facility to conduct the narcotics transaction. At approximately 9:01 p.m., surveillance observed RUSSELL in his black Yukon exit his residence located at 547 N. Lawler Avenue (**Search Location H**). At approximately 9:03 p.m., officers conducted a traffic stop on RUSSELL, under the guise that they were looking for an armed robbery suspect, but knowing that RUSSELL was in the process of delivering cocaine to HARRIS.. During the stop, officers conducted a search of RUSSELL and found a baggie containing suspect cocaine in his pocket. They also discovered \$9,308 on his person. To maintain the covert nature of the investigation,

officers then let RUSSELL leave without charging him at that time. The suspect cocaine field test positive for containing cocaine and weighed approximately 63 grams.

376. At approximately 9:18 p.m. (Call #5337), RUSSELL called HARRIS and told HARRIS that he “bumped into something” and would need a minute before he met with HARRIS. At approximately 9:56 p.m. (Call #5339), HARRIS sent a text to RUSSELL that read, “At the crib when u get ready.” At approximately 10:48 p.m. (Call #5341), RUSSELL sent a text message to HARRIS that read, “Outside.” Based on these calls and texts, agents believe that RUSSELL returned to his residence to obtain another 63 grams of cocaine, which he then delivered to HARRIS.

c. DARVEN MARION

377. As discussed above, CS-1 reported to law enforcement that MARION is a long time member of the Gangster Disciples Street Gang who runs his own drug spot a few blocks from where the HERNDON DTO operates its drug spots. According to CS-1, from approximately May 2011 through approximately February 2013, CS-1 purchased an average of nine ounces of cocaine from MARION each week, which he/she resold to his/her retail customers at a profit. The investigation has revealed that MARION has both bought wholesale quantities crack cocaine and sold wholesale quantities crack cocaine to members of the HERNDON DTO. A few examples follow.

May 7, 2013: CS-1 Purchased Approximately 68.5 Grams of Crack Cocaine from MARION and HARRIS

378. In early May 2013, CS-1 exchanged various unrecorded phone calls with MARION, who was Marion Phone 1. During these phone calls, CS1 arranged to purchase 2.25

ounces of crack cocaine from MARION. During these phone calls, CS-1 and Marion agreed to meet at a social club located near Lake Avenue and Homan Avenue in Chicago on May 7, 2013.

379. On May 7, 2013, at approximately 4:26 p.m., CS-1 had a recorded a phone call with MARION, who was using Marion Phone 1. During the call, CS-1 stated, “What up Big Hommie, you around?” MARION responded, “Yeah, I’m gonna be at the club.” CS-1 then stated, “Alright, I finna get ready to come up there.” MARION stated, “Alright.”

380. On May 7, 2013, at approximately 4:30 p.m., agents searched CS-1 and CS1’s vehicle for the presence of weapons, drugs, or excessive money, none of which were found. An agent provided the CS-1 with \$2,500 in undercover United States currency (hereinafter, “buy funds”). CS-1 was equipped with concealed audio/video recorders, which subsequently malfunctioned, resulting in no recordings being produced. CS-1 then traveled, under surveillance, to the social club located at 155 North Homan Avenue in Chicago.

381. At approximately 4:51 p.m., law enforcement officers performing surveillance (“surveillance”) observed CS-1 arrive outside of the social club at 155 North Homan Avenue and meet with MARION.²¹ Surveillance then observed MARION enter the social club with CS-1. According to CS1, once inside the club, CS-1 told MARION that CS-1 wanted to purchase 2.25

²¹ The identification of MARION in this Affidavit is based upon the following: Agents observed MARION meet with CS-1 on May 7, 2013. Agents compared the person who was present at the meetings with a known mug shot photograph of MARION and determined that the individual was, in fact, MARION. Further, CS-1 identified the person with whom CS-1 met and spoke on May 7, 2013 as MARION. CS-1 also identified MARION, based on his voice, as being the user of Marion Phone 1. Further, as discussed herein, MARION arranged to meet CS-1 at a social club over Marion Phone 1 and, in fact, met with CS-1 at that social club. Further, officers familiar with MARION’s voice from previous contact listened to calls over Marion Phone 1 and concluded that MARION was the user of this phone.

ounces of crack cocaine. According to CS-1, Marion responded by calling his supplier, HARRIS.

382. At approximately 6:00 p.m., surveillance observed HARRIS, who was driving a white Buick regal with Indiana license plate #589LGG (the “white Buick”), arrive in the parking of the social club and meet with MARION. MARION then reentered the club. HARRIS drove off.

383. According to CS-1, MARION told CS-1 that he just ordered 4.5 ounces of cocaine, 2.25 ounces for CS-1 and 2.25 ounces for himself, from HARRIS. MARION told CS-1 that CS-1’s portion of the cocaine would cost \$2,375. According to CS-1, CS-1 then gave MARION \$2,375 in buy funds, which MARION handed to his girlfriend, Individual Three.

384. At approximately 7:33 p.m., surveillance observed HARRIS park the white Buick in the parking lot of the club and then enter the club. CS-1 observed HARRIS meet with MARION inside the social club. According to CS-1, MARION then showed CS-1 the cocaine that HARRIS had given to MARION. According to CS-1, MARION then told CS-1 that he was going to have the cocaine taken to a house where it would be cooked into crack cocaine.

385. At approximately 7:45 p.m., surveillance observed CS-1, MARION, and Individual Three exit the club and travel to and enter a residence located at 348 North Avers Avenue (**Search Location I**), which public records indicate is MARION’s residence. According to CS1, inside this residence, MARION cooked the powder cocaine into crack cocaine using a pan on the stove. MARION then cut the crack in half and distributed half of it to CS-1 inside a plastic baggie.

386. At approximately 8:00 p.m., after the transaction was complete, CS-1 drove, while under constant surveillance, to a pre-arranged meeting location. CS-1 arrived at that location and met with agents, who deactivated the concealed audio/video recorders. Agents took possession of a plastic baggie containing suspect crack cocaine, \$125 in unused buy funds, and the recording devices. Agents searched the CS-1 and his/her vehicle for excessive funds and contraband, none of which were found. Subsequent DEA lab results revealed that the substance that MARION distributed to CS-1 contained cocaine base and weighed approximately 68.5 grams.

July 22, 2014: MARION Distributes 125 Grams of Cocaine to SMITH (Count Eleven)

387. On July 22, 2014, at approximately 2:05 p.m. (Cal #12276) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation, SMITH stated, "I need like four dollars and fifty cents [four and a half ounces of cocaine] man, ah what does the number look like [price for the crack cocaine]?" MARION replied, "55 [\$5,500]." Later in the conversation, MARION stated, "Actually I am going to cut some now [cut a quantity of cocaine of a brick of cocaine]."

388. At approximately 2:47 p.m. (Call #12298) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation, MARION stated, "I just left the store, I got to run to Home Depot then I'll go take care of that, or get on top of it [pick up the cocaine]." SMITH replied, "I left it [the money] with Boo." MARION asked, "What, the money?" SMITH answered, Yeah." MARION asked, "This isn't funny money, is it?" SMITH answered, "Come on man, this is for me man this is for my cousin."

MARION stated, "Alright, I'll get right on top of it. Do he want it done or undone [crack or powder cocaine]." SMITH answered, "Undone [powder cocaine]."

389. At approximately 4:17 p.m. (Call #12318) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation, MARION stated, "I just made it back." SMITH stated, "I already have the money." MARION stated, "Just drop it [the money] off over here. . . I'll grab it [the cocaine], and you can still come over here and get it." SMITH finished, "Alright, you grab it [cocaine]; I got no problem coming and getting it."

390. At approximately 4:27 p.m., surveillance observed MARION exit a blue Dodge Charger; Illinois plate R616817, registered to MARION, and enter a carwash at Lake and Keeler Streets. Minutes later, surveillance observed MARION emerge and travel to his residence located at 348 North Avers (**Search Location I**).

391. At approximately 6:00 p.m. (Call #12348) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During the conversation, MARION stated, "I'm on my way to pick it up [the cocaine]. So I'll meet you back at my house in a few minutes." SMITH replied, "Call me cause just you know, I don't want to be riding around with that money." MARION replied, "Alright." SMITH concluded, "Don't let that mark give you baby powder."

392. At approximately 6:56 p.m., surveillance observed MARION return to and enter his residence located at 348 N. Avers (**Search Location I**). Surveillance did not observe him leave, but surveillance was not maintained on his residence constantly between 6:00 p.m. and 6:56 p.m.

393. At approximately 7:04 p.m. (Call #12370) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation, MARION stated, "Come on Bo [get cocaine]." SMITH stated, "Alright let me get the stuff up in the backyard."

394. At approximately 7:08 p.m., surveillance observed SMITH exit the rear yard of 4539 West Congress rolling a city garbage can. At 7:14 p.m., surveillance observed SMITH enter a car and drive toward MARION's residence on Avers. At approximately 7:16 p.m., surveillance observed MARION exit 348 North Avers (**Search Location I**) and mill about outside. At approximately 7:19 p.m., SMITH arrived, and SMITH and MARION entered the residence separately.

395. At approximately 7:33 p.m., surveillance observed SMITH exit this residence, enter his car, and drive away. Officers then conducted a traffic stop on SMITH knowing that he had just received cocaine from MARION. Officers informed SMITH that they had heard reports of an individual with a gun and that SMITH's car met the description of the person with a gun. SMITH stated that he did not have a gun on him. Officers then frisked SMITH and discovered a plastic baggie containing suspect cocaine. After the officers recovered the suspect cocaine, SMITH commented that he had "cocaine," but no gun. To maintain the covert nature of the investigation, officers then pretended to have an emergency call causing them to leave the area without arresting SMITH. The suspect cocaine tested positive for containing cocaine and weighed approximately 125 grams. It has been sent to the DEA laboratory for further testing.

396. At approximately 7:39 p.m. (Call #12374) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using Marion Phone 1. During this conversation,

SMITH stated, "As soon as I leave your house, the police grab me man." MARION replied, "They didn't get it [the cocaine], did they?" SMITH replied, "Yeah, they got it man." SMITH continued, "Hey Darven [MARION], they took it, [cocaine], they took it, they really looking for guns and they said somebody was loaded up in a sliver Impala with a gun in it. I was like swear to God they would have took that shit and they took it and let me go." MARION stated, "Let me clean up [get narcotics out of his house]."

397. At approximately 7:46 p.m., (Call #12383) SMITH, who was using Target Phone 4, had a conversation with the customer he purchased the cocaine for, who was using telephone number (708) 250-9980. During this conversation, SMITH stated, "Man, I should have waited man, I went over by Darven [MARION] man, police stopped me."

398. At approximately 8:02 p.m. (Call #12393) SMITH, who was using Target Phone 4, had a conversation with MARION, who was using telephone number (773) 406-9388. During this conversation, SMITH stated, "I don't roll like that [telling the police]. I don't want you thinking nothing like that." MARION replied, "I don't think no shit like that of you man." SMITH stated "What I was calling you for, hey man don't say nothing, nothing to Goo [HERNDON] man, cause I don't even want to hear that shit man, really I don't. That between me and you, know I got to come up with they motherfucking money [SMITH had to pay back his cocaine customer who had prepaid for the cocaine that was seized from SMITH]."

5. The HERNDON DTO's Wholesale Operations

399. As discussed above, the investigation has also revealed that the HERNDON DTO sells wholesale quantities of narcotics to various customers. As discussed below, HERNDON has sold wholesale quantities of heroin to CS-4 on multiple occasions; HARRIS has sold

wholesale quantities of cocaine to KESHAW EUCELL; and SMITH has sold wholesale quantities of crack cocaine to DARRYL JONES, MILDRED SMITH, and HARRY SMITH.

a. HERNDON and SMITH Sell Wholesale Quantities of Heroin to CS-4

April 12, 2014: SMITH and HERNDON Sell CS-4 59 Grams of Heroin

400. On April 2, 2014, at approximately 12:55 p.m., CS-4 met with agents and was searched for contraband, none of which was found. CS-4 was equipped with concealed audio/video recording devices. CS-4 was given \$1,200 in Home Depot gift cards. CS-4 had previously told agents that he had previously been involved with a fraud with HERNDON related to passing gift cards at Home Depot that were purchased with counterfeit credit cards. More specifically, CS-4 bought Home Depot gift cards with stolen credit cards and then sold the Home Depot cards to HERNDON for half their value in cash or narcotics. Agents provided these cards to CS-4 and instructed CS-4 to attempt to locate HERNDON and tell HERNDON that he/she had come into possession of additional Home Depot cards purchased fraudulently. CS-4 then traveled, under agent surveillance, toward a house HERNDON was rehabbing located at 4539 West Jackson Boulevard in Chicago. CS-4 previously related to law enforcement that HERNDON uses 4539 West Jackson Boulevard (**Search Location D**) as his base of operations, lives at 4538 West Jackson Boulevard (**Search Location C**), and uses 716 South Kostner (**Search Location E**) as a stash house. Surveillance then observed CS-4 meeting with HERNDON and later also with SMITH. This meeting took place at several locations, including 4539 West Jackson Boulevard and Home Depot. The following is a description, as captured by the recording devices unless otherwise noted, of the relevant portion of the meeting: Near the

beginning of the meeting, CS-4 stated, "I got some GC's [gift cards]." HERNDON replied, "What kind?" CS-4 replied, "Home Depot." CS-4 stated, "12 [CS-4 had \$1,200 worth of gift cards]." HERNDON stated, "Split 'em right down the middle and I'll take 'em [HERNDON would pay \$600 for the \$1,200 in gift cards]." As CS-4 and HERNDON were driving to the Home Depot, CS-4 recounted that he had previously looked for HERNDON, in order to start doing business with him again but had not been able to find him. HERNDON then stated, "I'm a get you Bo's [SMITH's] number. He always, he answers the phone. I don't answer the phone." Later in the conversation, HERNDON stated, "All you got to do is call this nigga Bo [SMITH] phone and he gonna answer." Later, HERNDON explained after not being selected for professional basketball, "I went back home and started selling some drugs." Toward the end of the meeting, HERNDON walked into 4539 West Jackson Boulevard (**Search Location D**) and called out "Bo!" HERNDON and CS-4 walked up a flight of stairs and encountered SMITH. HERNDON then stated, "[CS-4] gonna put your number in [CS-4's] phone." SMITH then stated that his number was Target Phone 4. At the conclusion of the meeting, agents met with CS-4 and took possession of the recording devices and \$600 HERNDON had given CS-4.

401. On April 8, 2014, at approximately 3:05 p.m., CS-4 engaged in another recorded meeting with HERNDON and SMITH, during which CS-4 sold HERNDON \$1,200 in Home Depot gift cards in exchange for \$600. Again, the meeting took place near 4539 West Jackson Boulevard (**Search Location D**) and at the Home Depot. During this meeting, CS-4 asked HERNDON, "How many joints [buildings] you probably got now Goo? You've been doing this since you was young ain't you?" HERNDON replied, "I've been doing this shit [selling narcotics and buying buildings with the proceeds] for 25 years. My first few [properties] only \$5,000,

\$10,000 but, I was selling bags [of narcotics], so I didn't give a fuck, make about fifteen thousand a day and put two thousand into buildings. That's how I got started, fucking with this shit." HERNDON stated he learned this technique from someone else but did not specify who. HERNDON stated, "So I was hanging with him right? And he was showing me all the tricks to it. Throw the money into that you know, instead of keep buying these cars." After returning from Home Depot, at approximately 4:14 p.m., HERNDON asked CS-4, "What I give you five [\$500]?" HERNDON then stated, "I got a hundred coming with Bo." SMITH then appeared and handed CS-4 \$100.

402. On April 11, 2014, at approximately 12:41 p.m., CS-4 placed a consensually recorded call to SMITH, who was using Target Phone 4. During this call, CS-4 stated, "Yo, Bo." SMITH replied, "Yeah." CS-4 stated, "What up witcha? Eh, I was trying uh, cause Goo [HERNDON] won't answer his phone, he around?" SMITH stated, "Oh, hold on a minute though." A few seconds later HERNDON came on the line and stated, "Yo!" CS-4 replied, "Yo!" HERNDON stated, "I gotta run out at uh, 1:00 [p.m.] to 1:30 [p.m.] but I'll be back here before 2:00 [p.m]."

403. On April 11, 2012, at approximately 1:50 p.m., CS-4 again met with agents, who equipped CS-4 with recording devices and gift cards. CS-4 then traveled to 4539 West Jackson Boulevard (**Search Location D**). During the ensuing meeting, CS-4 stated, "I wanna sit down and talk to you too man." HERNDON replied, "Bout what, the D [heroin]?" CS-4 replied, "Yeah." HERNDON stated, "Okay, yeah, I got the D [heroin], that's what I work with, I got the C [cocaine] too, but you don't make no money on. . ." CS-4 interrupted and asked, "That shit high?" HERNDON replied, "Look here man you used to pay twenty-two [\$22,000] for a key

[kilogram of cocaine] now they charging to you thirty-five [\$35,000].” HERNDON continued, “Listen now, with all the niggas money [HERNDON DTO workers’ salaries], that margin [with all of the money that HERNDON has to pay his workers, he doesn’t make much margin, or profit].” HERNDON stated, “If you wanna sell a whole key it ain’t worth it . . . you got to get a G to get some money out of it...a G fo’ sho’ [HERNDON is saying that one must charge at least \$1,000 per ounce in order to make any profit from the sale].” HERNDON explained, “I don’t like fucking with it [cocaine as compared to heroin], but I gotta get. I keep my little nephews [HARRIS and other members of the HERNDON DTO] and them gang banging and shit with it, they have to have something to work with [HERNDON arranges for HARRIS and the DTO to be supplied with cocaine].” CS-4 and HERNDON then agreed to meet later. After the transaction, CS-4 met with agents who collected the recording device and searched CS-4 in the typical fashion.

404. On April 12, 2014, at approximately 11:39 a.m., CS-4 met with agents, who searched him/her for contraband, none of which was found. CS-4 was equipped with audio/video recording devices and given \$4,000 in undercover buy funds. CS-4 then traveled, under surveillance, to 4539 West Jackson Boulevard (**Search Location D**), where he/she arrived at approximately 11:48 a.m. Surveillance agents observed HERNDON, SMITH, and MARION standing on the front porch of the residence. CS-4 approached them and began a discussion. During the conversation, CS-4 asked, “How much you charge me for fifty [grams of heroin]?” HERNDON replied, “Four. Four thousand [\$4,000], but it, you can get your money back I promise you. You can get your money back [CS-4 could sell 50 grams of heroin at a profit if he/she paid \$4,000 for it]. Come back and see me. I promise you, you will get your money back.

Matter of fact I tell you what I'm gonna do. Why don't you just take five [five grams of heroin] and see what you can do with it. You'll come back." Surveillance then observed HERNDON leave the area. Approximately three minutes later, HERNDON returned and handed CS-4 a baggie containing suspect heroin. CS-4 then left the area and headed to a pre-determined meet location.

405. On April 12, 2014, at approximately 1:08 p.m., CS-4 arrived at this pre-determined location and met with agents. Agents took possession of the recording devices, \$4,000 in unused buy money, and baggie containing suspected heroin. The substance field tested positive for heroin, weighed approximately 6 grams, and has been sent to the DEA lab for further analysis.

406. On April 12, 2014, at approximately 5:28 p.m., CS-4 met with agents, who searched him/her for contraband, none of which was found. CS-4 was equipped with audio/video recording devices and given \$4,000 in undercover buy funds. CS-4 then traveled, under surveillance, to 4539 West Jackson Boulevard (**Search Location D**), where he/she arrived at approximately 5:37 p.m. CS-4 then entered HERNDON's truck and HERNDON began to drive around the neighborhood. During this meeting, CS-4 stated, "But uh, we uh put seven on it and said shit, motherfucker take another hit [CS-4 is saying he/she used seven pills of Dormin, a sleep aid used as a cutting agent, and the heroin still retained its potency]." HERNDON replied, "It'll take ten [pills of Dormin] cause uhm I know that it goes, it stretches farther than, but I just, you know, where I know be safe at where a mother fucker can't comeback." CS-4 stated, "Can't complain." At approximately 5:39 p.m., HERNDON and CS-4 returned to the vicinity of 4539 West Jackson Boulevard (**Search Location D**), where SMITH was waiting. SMITH,

HERNDON, and CS-4 then entered the residence located at 4539 West Jackson (**Search Location D**). HERNDON asked, “What are we doing [how much heroin did CS-4 want]?” CS-4 replied, “Four [four thousand dollars’ worth of heroin].” CS-4 then handed HERNDON the \$4,000 in buy funds, and HERNDON handed a these funds to SMITH, who counted the money. HERNDON stated, “I’ll be right back.” Surveillance then observed HERNDON exit the building and walked out of view of surveillance. He returned approximately ten minutes later, entered 4539 West Jackson (**Search Location D**), and handed CS-4 another baggie containing suspect heroin in the presence of SMITH. HERNDON then instructed CS-4, “If I ain’t answering [the phone] call his [SMITH’s] phone.” CS-4 then left and traveled to a pre-arranged meeting location.

407. On April 12, 2014, at approximately 6:09 p.m., CS-4 arrived at this location and met with agents. Agents searched CS-4 for the presence of excess money, none of which was found. Agents took possession of the recording devices and baggie containing suspected heroin. The substance field tested positive for heroin, weighed approximately 53 grams, and has been sent to the DEA lab for further analysis.

April 16, 2014: HERNDON and SMITH Sell CS-4 151 Grams of Heroin (Count Three)

408. On April 16, 2014, at approximately 12:00 p.m., CS-4 met with agents who searched him/her and his/her vehicle for contraband, none of which was found. CS-4 was equipped with audio/video recording devices. CS-4 then traveled, under surveillance, toward 4539 West Jackson Boulevard (**Search Location D**). CS-4 entered the building at approximately 12:34 p.m. A minute later, surveillance observed HERNDON enter the building.

409. HERNDON asked CS-4 how much he/she wanted, and CS-4 explained he/she was sourcing 100 grams of heroin for his cousins and 50 grams of heroin for him/herself. HERNDON then stated, "Long as they your cousins," and then warned CS-4 to be careful because the heroin was around "80 some percent [pure]. . . whoever get caught with it they gonna have a problem." CS-4 and HERNDON then talked about construction and police presence in the area before HERNDON asked CS-4 how much time he/she needed to put the money together for the deal. CS-4 told HERNDON he/she need about an hour and the conversation ended soon thereafter. At approximately 12:56 p.m., CS-4 left 4539 West Jackson and traveled to a pre-determined meeting location.

410. CS-4 arrived at the location at approximately 1:05 p.m. No contraband was found on CS-4 or in the CS's vehicle. Agents removed the recording devices. At approximately 2:03 p.m., CS-4 met with agents, who searched him/her for contraband, none of which was found. CS-4 was equipped with audio/video recording devices and provided with \$12,000 of undercover buy funds. CS-4 then traveled, under surveillance, to 4539 West Jackson Boulevard, where he/she arrived at approximately 2:14 p.m. At approximately 2:17 p.m., as captured on the recording device, HERNDON walked into 4539 West Jackson Boulevard (**Search Location D**). CS asked, "walk upstairs?" HERNDON replied, "Uh, I gotta let you go check it out again [HERNDON wanted to give CS-4 a sample of the heroin prior to consummating the 150 gram deal]. They just opened a new key [kilogram of heroin]." CS-4 replied, "Okay." HERNDON continued, "I'm a give you five [grams of heroin]. You know, go and make sure they [CS-4's purported customers] want it before I send it." HERNDON continued, "You can take the money with you. How far you gotta go?" CS-4 told HERNDON he/she didn't have too far to go.

HERNDON told “Take the five [grams of heroin]. Take the money. Take it witcha. Let ‘em know exactly what they got going on now that way you’ll keep them motherfuckers forever.” Shortly thereafter CS-4 left 4539 West Jackson Boulevard and drove to a pre-arranged meeting location.

411. At approximately 1:05 p.m., CS-4 returned to and arrived at this location and met with agents. Agents searched CS-4 for the presence of excess money, none of which was found. Agents took possession of the recording devices, the \$12,000 in buy funds and baggie containing suspected heroin. The suspect heroin field tested positive for containing heroin, weighed approximately 5 grams, and has been sent to the DEA laboratory for further analysis.

412. At approximately 3:45 p.m., CS-4 was again searched for contraband, along with the CS’s vehicle, with negative results. CS-4 was equipped with covert recording devices and provided with \$12,000 of undercover buy funds. CS-4 then traveled, under surveillance, toward the vicinity of 4539 West Jackson Boulevard. At approximately 3:55 p.m., CS-4 entered the house and met with HERNDON. HERNDON asked CS-4 how the customers liked the sample and CS-4 replied, “This time he burned it [to check the quality].” HERNDON replied that the customer did that to see “if it a shooter [high quality enough to inject].” HERNDON asked for CS-4’s money and then called to SMITH. When SMITH came over, HERNDON instructed him to “see if that’s twelve [\$12,000] and then once you do that bring [CS-4] down by the garage, I ain’t gonna have nobody here [inside (**Search Location D**)].” HERNDON then left 4539 West Jackson Boulevard (**Search Location D**). Surveillance observed HERNDON travel in his vehicle to 716 South Kostner Avenue (**Search Location E**), which he was observed entering with a key. Meanwhile, CS-4 and SMITH went to a garage in the vicinity of 4537-39 West

Congress Parkway. HERNDON was inside 716 Kostner for approximately ten minutes. Surveillance then observed HERNDON travel from 716 South Kostner to the garage at 4537-39 West Congress Parkway in his vehicle. As HERNDON approached, SMITH told CS-4, "There go Goo (HERNDON) right there..." CS-4 walked to the passenger window on the driver's side and HERNDON handed CS-4 a plastic bag containing the suspect heroin. CS-4 then traveled toward a pre-determined meeting location.

413. At approximately 4:25 p.m., CS-4 arrived at this location, where agents recovered the recording devices and seized the suspected heroin. CS-4 and the CS's vehicle were searched for contraband, none of which was found. The suspect heroin field tested positive for containing heroin, weighed approximately 146 grams, and has been sent to the DEA laboratory for further analysis.

June 4, 2014: HERNDON Sells CS-4 Approximately 53 Grams of Heroin

414. On June 4, 2014, at approximately 1:15 p.m., CS-4 met with agents at a predetermined meeting location. CS-4 and CS-4's vehicle were searched for contraband and none was found. CS-4 was equipped with a covert recording device and provided with \$4,500 of undercover buy money and \$1,000 worth of Menard's gift cards. CS-4 intended to represent the gift cards as fraudulently obtained and sell them to HERNDON for half the cash value as discussed above. CS-4 then traveled, under surveillance, the vicinity of 4539 West Jackson Boulevard.

415. At approximately 1:33 p.m., as captured on the recording device, CS-4 entered the house and met with HERNDON. Shortly thereafter, CS-4 and HERNDON left the house and entered HERNDON's vehicle. During the ride to Menard's, CS-4 and HERNDON engaged in

conversation about narcotics HERNDON stated to CS-4, "I got Steve White with that shit one day man. We had a key [quantity of narcotics], I had to be about forty something years old that year right, so why we picked up a key so we had this guy ridin' with us says 'hey give me the key in case the police come you know, man they gonna catch your slow ass.'" At approximately 1:46 p.m., CS-4 and HERNDON arrived and entered Menard's. As captured on CS-4 covert recording device, HERNDON and CS-4 walk around Menard's and HERNDON purchased several items using Menard's gift cards supplied by CS-4. They exited Menard's at approximately 2:02 p.m. and traveled to Pepe's Locksmith located at 4329 W. 26th Street. At approximately 2:05 p.m., HERNDON parked his van and entered Pepe's Locksmith.

416. At approximately 2:21 p.m., HERNDON exited Pepe's Locksmith, entered his van, and drove back toward 4539 West Jackson Boulevard (**Search Location D**). During this ride, CS-4 asked, "Hey uh I'ma say, eh eh, you ain't run across no more of the... no more of the you ain't go get it did you [cocaine]?" HERNDON replied, "What the D [heroin]?" CS-4 stated, "Nah, nah, the the C [cocaine]." HERNDON answered, "Ain't no C out here." CS-4 stated, "Damn." HERNDON continued, "I was just in there [Pepe's Locksmith and Hardware] talking to that motherfucker trying to get some...talking bout he got some sixty percent...I don't want that. He had C though." CS-4 stated, "Uh huh." HERNDON continued, "First he told me it was eighty percent. I don't want that. You know I don't want no sixty."

417. At approximately 2:23 p.m., HERNDON and CS-4 arrived in the vicinity of 4539 West Jackson Boulevard (**Search Location D**). At this time, CS-4 asked HERNDON "You had time to grab me a fifty [grams of heroin]?" HERNDON asked, "What, you ready now?" CS-4 answered, "Yeah." HERNDON stated, "Cool, you got \$500 [credit toward the heroin purchase]"

coming so \$3,500.” CS-4 replied, “Uh huh.” HERNDON instructed CS-4 to, “Just go in the house, let me run to the house [HERNDON’s residence] cause I got to get out of here.” CS-4 replied, “Okay,” and walked toward and then into 4539 West Jackson Boulevard (**Search Location D**). At approximately 2:27 p.m., surveillance observed HERNDON walk to and enter 4538 West Jackson (**Search Location C**). At approximately 2:32 p.m., surveillance observed HERNDON exit 4538 West Jackson (**Search Location C**) and walk to and enter 4539 West Jackson (**Search Location D**). Inside, HERNDON handed CS-4 a clear plastic baggie containing approximately 53 grams of suspect heroin and CS-4 handed HERNDON \$3,500 in buy money. CS-4 then left 4539 West Jackson Boulevard and drove back to a pre-arranged meeting location.

418. At approximately 2:27 p.m., CS-4 arrived at this location, where agents recovered the recording devices, recovered the \$1,000 in unused buy money, and seized the suspected heroin. CS-4 and the CS’s vehicle were searched for contraband, none of which was found. The suspect heroin field tested positive for containing heroin, weighed approximately 53 grams, and has been sent to the DEA laboratory for further analysis.

July 15, 2014: HERNDON Sells CS-4 Approximately 153 Grams of Heroin

419. On July 15, 2014, at approximately 1:15 p.m., CS-4 met with agents at a predetermined meeting location. CS-4 and CS-4’s vehicle were searched for contraband and none was found. CS-4 was equipped with a covert recording device and provided with \$12,000. CS-4 then traveled, under surveillance, the vicinity of 4539 West Jackson Boulevard.

420. At approximately 2:42 p.m., CS-4 met with HERNDON inside of 4539 West Jackson Boulevard (**Search Location D**). HERNDON then asked, “One fifty [did CS-4 want

150 grams of heroin]?” CS-4 stated, “Okay.” HERNDON offered CS-4 a sample by saying, “You know what I need to give you a piece...cause it changed [this was a new batch of heroin].” CS-4 stated, “Okay.” HERNDON stated, “So he try it before he do all his tricks.” HERNDON continued, “...now they say they say it's good.” CS-4 responded, “Mmm huh.” HERNDON continued, “But I'm gonna give you a piece, go ahead and try it, well he gotta go for he gotta go travel with it I don't want him to get all the way down there...” CS-4 replied, “Okay.” At approximately 2:44 p.m., surveillance observed HERNDON leave this residence, walk across the street and enter 4538 West Jackson Boulevard (**Search Location C**) using a key.

421. At approximately 2:48 p.m., surveillance observed HERNDON exit 4538 West Jackson (**Search Location C**) and enter 4539 West Jackson (**Search Location D**). When he returned, HERNDON handed CS-4 a baggie containing suspect heroin and stated, “Alright, that’s five.” CS-4 then traveled to a pre-arranged meeting location.

422. At approximately 3:02 p.m., CS-4 returned to and arrived at this location and met with agents. Agents searched CS-4 for the presence of excess money, none of which was found. Agents took possession of the recording devices, the \$12,000 in buy funds and baggie containing suspected heroin. The suspect heroin field tested positive for containing heroin, weighed approximately 5 grams, and has been sent to the DEA laboratory for further analysis.

423. At approximately 3:23 p.m., CS-4 met with agents, who searched him/her for contraband, none of which was found. CS-4 was equipped with audio/video recording devices and provided with \$12,000 of undercover buy funds. CS-4 then traveled, under surveillance, to 4539 West Jackson Boulevard (**Search Location D**), where he/she arrived at approximately 3:27 p.m. As captured on the recording device, CS-4 approached HERNDON, who was sitting on the

porch of the residence. HERNDON stated, "You need to follow me over here." HERNDON then entered a van, followed by CS-4 in his/her own vehicle, and the two drove to 716 South Kostner Avenue (**Search Location E**). After arriving at this location, HERNDON stated that he forgot his keys. CS-4 waited at this location, which HERNDON drove to 4538 West Jackson (**Search Location C**). A few minutes later, HERNDON returned to 716 South Kostner (**Search Location E**), along with SMITH. HERNDON and CS-4 then entered the residence (**Search Location E**).

424. Once inside, HERNDON stated, "One twenty [grams of heroin]," and handed CS-4 a baggie containing suspect heroin. CS-4 replied, "(UI) gave me them one forty for them were five grams you gave me right?" HERNDON stated, "Mmm huh." CS-4 stated, "I, I wanted one fifty." HERNDON replied, "I didn't know about that." CS-4 handed HERNDON the buy money and stated, "Yeah that's a twelve right there [\$12,000.00]." HERNDON replied, "(UI) okay that's one twenty, I gotta give you twenty five more cause I gave you five." HERNDON then went into another room. When he emerged, he handed CS-4 another baggie containing suspect heroin. CS-4 then left 716 South Kostner Avenue and drove back to a pre-arranged meeting location.

425. At approximately 4:27 p.m., CS-4 arrived at this location, where agents recovered the recording devices and seized the suspected heroin. CS-4 and the CS's vehicle were searched for contraband, none of which was found. The suspect heroin field tested positive for containing heroin, weighed approximately 148 grams, and has been sent to the DEA laboratory for further analysis.

b. SMITH Sells Wholesale Quantities of Crack Cocaine on Behalf of HERNDON to DARRYL JONES, MILDRED SMITH, HARRY SMITH, and Others

i. DARRYL JONES

May 1, 2014: SMITH Sells 128 Grams of Crack Cocaine to DARRYL JONES (Counts Six and Seven)

426. On April 30, 2014, at approximately 1:33 p.m. (Call #1995), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using phone number (773) 936-8873 (“Jones Phone 1”). During this conversation, SMITH stated, “Oh, oh, check this out, don’t call and say nothing don’t change, but he got to wait till after four o’clock cause gotta check it out forget whatever you gonna get together get it together [SMITH is telling DARRYL JONES to gather his buy money because after HERNDON is satisfied with the new shipment of crack cocaine, he will putting it out for sale].” DARRYL JONES replied, “Okay.” SMITH stated, “So when I call you can come and take it [the crack cocaine] and go put it up [sell it].” DARRYL JONES asked, “Yeah, get all the money what I got huh?” SMITH replied, “Get what you can get man, get what you can get, you know what I’m saying?”

427. On May 1, 2014, at approximately 7:33 a.m. (Call #2223), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using DARRYL JONES Phone 1. During this conversation, DARRYL JONES stated, “Hey what’s going on Bo Bo?” SMITH answered, “Nothing much, he [HERNDON] ain’t stated nothing yet.” DARRYL JONES asked, “Oh, no did he go?” SMITH replied, “He told you ain’t nothing yet; he got it man.” DARRYL JONES asked, “Huh?” SMITH replied, “I told you he got it man [HERNDON has not released the crack cocaine for sale yet].”

428. On May 1, 2014 at approximately 1:13 p.m. (Call #2283), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using DARRYL JONES Phone 1. During this conversation, SMITH stated, "Man big fella [HERNDON] told me to tell you to come on man." DARRYL JONES replied, "Can I come tomorrow?" SMITH replied, "Yeah, Imma a tell him [HERNDON]. I'm on I'm on an errand, I'm about to make this errand and then and then go back and tell him. What you, a what you trying to do?" DARRYL JONES replied, "Four bucks [four ounces of crack cocaine]." SMITH stated, "Alright, I got you."

429. On May 1, 2014, at approximately 2:06 p.m. (Call #2303), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using DARRYL JONES Phone 1. During this conversation, SMITH asked, "Did you get what I text?" DARRYL JONES replied, "Yeah. I'll tell him that then, he told me to tell you if you uh...coming to be here about six [p.m.], but ok...I tell him." DARRYL JONES later stated, "Alright. I'm um, I finny leave right now. I'm finna come anyway. How is it [the quality of the crack cocaine]?" SMITH replied, "It's good. It's great."

430. On May 1, 2014, at approximately 2:48 p.m. (Call #2318), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using DARRYL JONES Phone 1. During this conversation, SMITH stated, "The reason he did it like that was to make it come back right." DARRYL JONES stated, "Yeah, cause he put that other shit in there right?" SMITH replied, "No, he didn't put that other shit in there. He didn't have no more [SMITH is telling DARRYL JONES that HERDON did not use a particular cutting agent when cooking the powder cocaine into crack cocaine]." DARRYL JONES asked, "What

color is that?" SMITH stated, "It is white looking. Believe me I ain't gonna tell you no lie. The shit right man. I ain't have no complaints [the crack cocaine is of high quality]."

431. On May 1, 2014, at approximately 4:02 p.m. (Call #2334), SMITH, who was using Target Phone 4, had a phone conversation with DARRYL JONES, who was using DARRYL JONES Phone 1. During this conversation, SMITH stated, "Hey Bo, I'm on California [Avenue], did I miss my spot?" SMITH replied, "No, you come off of Kostner [Avenue]." DARRYL JONES replied, "Oh shit, I ain't been here in so long. God damn it. I haven't been out here in so long. I said California Avenue, damn. I seen Homan [Avenue]." DARRYL JONES stated, "I'll keep on going I already know where to go."

432. On May 1, 2014, at approximately 4:40 p.m., surveillance observed DARRYL JONES, who was driving a white Cadillac ("the Cadillac") arrive at and park outside of the residence located at 4537/39 West Congress Parkway. Surveillance observed DARRYL JONES exit the Cadillac and walk to the rear of this residence. Approximately six minutes later, surveillance observed DARRYL JONES and SMITH walk out of the rear of this residence. DARRYL JONES entered the Cadillac and began driving on the highway toward Indiana. Surveillance followed the Cadillac and alerted a state trooper that DARRYL JONES was in possession of narcotics.

433. On May 1, 2014, at approximately 5:24 p.m., the state trooper observed DARRYL JONES talking on his cell phone while driving. The trooper initiated a traffic stop on the Cadillac. The trooper asked DARRYL JONES for proof of insurance and DARRYL JONES stated that he could not provide it. The trooper placed DARRYL JONES under arrest and searched him. In DARRYL JONES's pocket, the trooper found a clear plastic bag containing

suspect cocaine. The suspect crack cocaine tested positive for cocaine base and weighed approximately 128 grams. The substance has been sent to the DEA laboratory for further analysis.

434. On May 1, 2014, at approximately 11:14 p.m. (Call #2468), SMITH, who was using Target Phone 4, had a conversation with HERNDON, who was using phone number 773-909-3068 (“Herndon Phone 1”). During this conversation, SMITH stated, “They just called me back, ah state boy got him pulled over [DARRYL JONES was pulled over by the police].” HERNDON replied, “State boy?” SMITH stated, “Yeah.” HERNDON answered, “Hmm.” SMITH stated, “State trooper got him pulled over for a moving violation.” HERNDON answered, “Oh.” SMITH stated, “So you know it would have to be you know running a red light, stop sign or something.” HERNDON replied, “On the expressway?” SMITH answered, “No, they told me it was on 73rd and South Shore.” HERNDON stated, “Oh. . . alright.”

DARRYL JONES Also Deals With HARRIS

435. On March 25, 2014, at approximately 9:39 a.m. (Call # 35487), HARRIS, who was using Target Phone 3, had a conversation with DARRYL JONES, who was using telephone number (773) 936-8873 (“Jones Phone 1”). During this conversation, JONES stated, “I need to see you.” HARRIS replied, “Shoot me a text.” JONES replied, “Alright.”

436. On March 25, 2014, at approximately 9:52 a.m., HARRIS, who was using Target Phone 3, received a text from JONES, who was using Jones Phone 1 (Call #8045). This text read, “63rd and Halstead [JONES wanted 63 grams of crack cocaine] what’s the trick [price] when can I come now.” HARRIS replied (Call #8045), “[\$]2250.” JONES replied via text, (Call #8047), “when can I come and I want to do it myself {JONES wanted to pick up the crack

cocaine personally rather than sending an associate].” HARRIS sent a reply text (Call #8050) which read, “take off let me know when clor [close].”

437. On March 25, 2014, at approximately 11:02 a.m., officers observed HARRIS arrive at the Car Wash (**Search Location B**). At approximately 12:55 p.m. (Call #8121), HARRIS, who was using Target Phone 3, had a conversation with JONES, who was using Jones Phone 1. During this call, HARRIS asked, “Where you at?” JONES responded, “I’m in the truck with the plow.” Shortly thereafter, officers observed a snowplow bearing Indiana license plate TK125LWZ arrive at the gas station. At approximately 1:00 p.m., the snow plow left the gas station, and officers pulled alongside the snow plow. During this incident, officers called Jones Phone 1, and as they did so, they observed JONES answer his phone, which was ringing. The officers that conducted this procedure listened to the calls made from Jones Phone 1 and concluded that JONES’s voiced matched the voice of the user of Jones Phone 1. Further, the license plate was registered to JONES. These officers compared this Individual to known mug shots of JONES and concluded that the driver of the snow plow was JONES. Officers followed JONES to an address in Gary, Indiana owned by HERNDON.

ii. MILDRED SMITH

May 1, 2014: SMITH Sells MILDRED SMITH An Ounce of Cocaine and Half An Ounce of Crack Cocaine (Count Eight)

438. On May 1, 2014, the same day SMITH sold crack cocaine to DARRYL JONES, SMITH also sold cocaine and crack cocaine to Mildred SMITH. At approximately 10:13 a.m. (Call # 2231), SMITH, who was using Target Phone 4, received a call from MILDRED SMITH, who was using (618) 917-6704 (“Mildred Phone 1”). Mildred SMITH stated, “I hope you can

tell me something delicious that's good and exciting. I hope you ain't gonna bust my bubble.” SMITH replied, “Yeah, I can but I don't know if you gonna get here in time, cause you know.” MILDRED SMITH answered, “I'm gonna come get it now.” SMITH stated, “Oh, you gonna leave today?” MILDRED SMITH replied, “I'm already on the road.” SMITH stated, “Oh, you already on the road?” MILDRED SMITH confirmed, “I'm already on the road.” SMITH asked, “What you talking about?” MILDRED SMITH stated, “Well, uh, I want you to cook me a whole chicken soft and a half a chicken hard [Mildred SMITH was asking for an ounce of powder cocaine and a half ounce of crack cocaine]. SMITH replied, “you don't have to put it, text it to my phone...what you talking about.” MILDRED SMITH stated, “I just want a good chicken meal.” SMITH replied, “ah, yeah, I know what you saying but I'm just saying text it to my phone.” Mildred SMITH stated, “Okay, alright.”

439. At approximately 3:37 p.m. (Call # 2332), SMITH, who was using Target Phone 4, received a call from MILDRED SMITH, who was using Mildred Phone 1. MILDRED SMITH asked, “Hey, you still working?” SMITH replied, “No, matter of fact I'm just pulling up over here. You here?” Mildred SMITH stated, “...well I'm just coming around the west suburbs.” SMITH confirmed Mildred SMITH's order by asking, “You say uh twenty-eight dollars and fourteen dollars (28 grams of powdered cocaine and 14 grams of crack cocaine).”

440. At approximately 4:04 p.m., surveillance observed MILDRED SMITH and a female passenger arrive in the vicinity of 503 South Kolmar Avenue in a Chevrolet Trailblazer bearing Illinois license plate P237127. Surveillance then saw ROBERT SMITH walk from the rear of 4537-39 West Congress Parkway to the Trailblazer and interact with MILDRED SMITH and the passenger. Your Affiant believes that SMITH sold MILDRED SMITH crack cocaine

and cocaine during this meeting. At approximately 4:07 p.m., MILDRED SMITH drove south on Kolmar and then proceeded east on Harrison in a Chevy Trailblazer. This vehicle is registered to MILDRED SMITH.

441. At approximately 4:08 p.m., the officers that performed the surveillance pulled up alongside of MILDRED SMITH's vehicle and had a brief conversation with her about allowing them to move ahead of her in traffic. These officers compared the likeness of the driver of this vehicle with known mug shots of MILDRED SMITH and determined that the driver was, in fact, MILDRED SMITH. The officers also compared the voice of this individual to the voice of the user of Mildred Phone 1 and concluded that MILDRED SMITH was the user of that phone.

iii. HARRY SMITH

442. During this investigation, on at least seven occasions between April 16, 2014 and May 21, 2014, HARRY SMITH was intercepted ordering "seven" grams of crack cocaine from SMITH. Surveillance repeatedly saw SMITH meet with HARRY SMITH after he placed these orders

April 26, 2014: ROBERT SMITH Sells HARRY SMITH Crack Cocaine (Count Nine)

443. On April 26, 2014, at 10:05 p.m. (Call #1470), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using phone number (773) 966-8423 ("Harry Phone 1"). During this conversation, HARRY stated, "I need a 7 [grams of crack cocaine]." SMITH responded, "Alright, I'm going to be there, be there in about ten minutes." At approximately 10:14, outside of 4539 West Congress Parkway, surveillance observed SMITH

approached a white 2010 Dodge Charger occupied by HARRY and conduct a hand to hand transaction.²² The Dodge Charger was registered to HARRY.

Other Days

444. On April 27, 2014, at 8:17 p.m. (Call #1630), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, HARRY SMITH stated, “Um the thing, in half [HARRY wants a half ounce of crack cocaine].” SMITH replied, “Alright, as soon as I get back to my car I’m gonna hit your phone come on then.” At approximately 8:19 p.m., surveillance observed HARRY SMITH park the white Dodge Charger discussed above behind a vehicle driven by SMITH. HARRY SMITH exited the Charger and walked to driver’s side of SMITH’s vehicle and reached into the driver’s side window of the vehicle and then returned to the white Charger.

445. On April 30, 2014, at 10:34 p.m. (Call #2009), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, HARRY SMITH stated, “A seven [HARRY SMITH wanted to buy seven grams of crack cocaine].” SMITH replied, “Okay, but what’s you gonna have to do is ahhhh, I’m ahhh on my way back I am down in the circle...I am coming that way from out south by your uncle but I

²² HARRY SMITH was identified as follows: (1) officers performing surveillance on April 26, 2014 and April 27, 2014 who observed the hand to hand transactions between HARRY SMITH and ROBERT SMITH looked at known mug shots of HARRY SMITH and determined that the person who met with ROBERT SMITH was HARRY SMITH – one of these officers also recognized HARRY SMITH from previous contact with him; and (2) on June 28, 2014, officers who have had innumerable conversations in the past with HARRY SMITH conducted an investigatory stop on HARRY SMITH who was driving the white Dodge Charger; these officers talked to HARRY SMITH for approximately ten minutes. The officers then listened to the calls made using Harry Phone 1 and determined that HARRY SMITH was the user of this phone.

will be back in about a few minutes I am going to call you, when I call you man just come on down and ah ah the other end.” HARRY SMITH replied, “Okay, I’m waiting on you, cuz I need it [crack cocaine] asap!” At 10:55 p.m. [Call #2032), HARRY SMITH called SMITH and told SMITH he was outside waiting.

446. On May 1, 2014, at 1:21 p.m. (Call #2286), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, HARRY SMITH asked, “What happened [does SMITH have crack cocaine]?” SMITH replied, “Tryin’ to let it dry [see paragraph 49 where SMITH explains that HERNDON put the crack cocaine out before it had a chance to fully dry].”

447. On May 1, 2014, at 4:34 p.m. (Call #2342), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, HARRY SMITH stated, "A seven right now [HARRY wanted seven grams of crack cocaine pronto]." SMITH replied, “Aight I’m down here by Three Stooges, I’ll come right now.”²³

448. On May 2, 2014, at 9:36 p.m. (Call #2676), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, HARRY SMITH stated, "I said I'm waitin' on ya I been down since last night [HARRY is out of crack cocaine]." SMITH asked, "What the number look like?" HARRY SMITH responded, "Six [grams of crack cocaine]". SMITH responded, "You talkin' about two of them [half an ounce of crack cocaine]?" HARRY SMITH responded, "Yeah" and SMITH

²³ In addition to DARRYL JONES, MILDRED SMITH, and HARRY SMITH, on May 1, 2014, intercepted calls reveal that ROBERT SMITH sold additional customers wholesale quantities of crack cocaine.

stated, "Alright". At 9:55 p.m. (Call #2677), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, HARRY SMITH stated, "Yeah I'm down there you on where you at?" SMITH replied, "I'm on Cicero right here I'm on my way to you. Just be ready so I can hand it to you I cause I don't want to ridin' up on nobody." HARRY SMITH responded, "Okay shit I was thinkin' the same thing."

449. On May 7, 2014, at 8:41 p.m. (Call #3502), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, SMITH asked, "Yo, what's up man?" HARRY SMITH asked "how long you finna be up Bo?" SMITH stated, "Uh I'ma be out for a few, bout another a another half an hour or so." HARRY SMITH then explained to SMITH that he was waiting on someone. SMITH asked, "Alright well yeah you got a you got a number in mind [how much crack did HARRY want]?" HARRY SMITH stated, "Um, it's gonna be um seven [grams of crack cocaine], for right now, so if you need some before you leave it's fo sho." SMITH replied, "Okay." At 9:57 p.m. [Call #3512]. SMITH and HARRY SMITH arranged to meet to conduct this transaction.

450. On May 11, 2014, at 3:11 p.m. (Call #4024), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this conversation, SMITH asked, "Uh, what the number look like [how much crack did HARRY want]?" HARRY SMITH replied, "Seven [grams of crack cocaine]." SMITH stated, "Aight, come on."

451. On May 12, 2014, at 7:44 p.m. (Call #4248), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this call HARRY SMITH asked SMITH if he was cool [if he had crack cocaine]. HARRY SMITH

then asked for "seven [grams of crack cocaine]." SMITH replied, "Okay, I'll be around there in a few minutes."

452. On May 21, 2014, at 7:41 p.m. (Call #5587), SMITH, who was using Target Phone 4, had a conversation with HARRY SMITH, who was using Harry Phone 1. During this call, HARRY SMITH stated, "Yeah I'm on my way back that way I need a seven [grams of crack cocaine]."

iv. KESHAW EUELL

453. The investigation has revealed that EUELL is a wholesale customer of both HARRIS and SMITH, who resells the cocaine to retail customers out of her home. There are multiple intercepted calls with EUELL that show that she received cocaine from HARRIS and SMITH. Some examples follow.

February 13, 2014

454. On February 13, 2014, at approximately 8:15 a.m. (Call #1004) HARRIS who was using Target Phone 1, received an incoming text from EUELL,²⁴ who was using phone number (773) 747-9792 ["Euell Phone 1"]. This text read, "I'm ready [to purchase cocaine]." At approximately 8:59 a.m. (Call #1013), HARRIS replied via text, "Ok, my shot [he has cocaine]."

455. On February 13, 2014, at approximately 10:57 a.m. (Call #1057), HARRIS, who was using Target Phone 1, had a conversation with EUELL, who was using Euell Phone 1.

²⁴ Agents believe EUELL to be the user of Euell Phone 1 because, on February 13, 2014, at approximately 8:15 a.m. (Call # 1004), HARRIS, who was using Target Phone 1, received a text message from Euell Phone 1, which read "I'm ready." Agents then observed HARRIS meet with EUELL. They identified EUELL by comparing her likeness at that meeting with known mug shots of EUELL. Further, Euell Phone 1 is subscriber to EUELL.

During this conversation, EUELL stated, "I got it [buy money] with me. HARRIS replied, "I'm right here on Arthington and Cicero." EUELL replied, "Okay, then I know where."

456. At approximately 11:33 a.m., surveillance observed EUELL arrive in a blue Dodge Avenger, Illinois plate R490822 arrive and park at 4728 West Arthington Avenue. At this time, HARRIS exited the Chi-Town Donk Shop located at 4727 West Arthington and entered the blue Dodge Avenger. The Avenger is registered to EUELL. HARRIS remained in the vehicle for approximately 18 minutes before exiting. EUELL then returned to her residence located at 1123 South Mason Avenue.

March 27, 2014

457. On March 27, 2014 at approximately 7:41 a.m. (Call #9083), HARRIS, who was using Target Phone 1, sent a text message to EUELL, who was using Euell Phone 1. This message read, "What up with my money [HARRIS is referring to cocaine money owed to him]". EUELL responded via text, "Never played with your money, so why all of a sudden text! Never play about business [narcotics trade]." HARRIS replied via text, "What u got swp u oug ["swap you out" refers to getting money from EUELL for previously fronted cocaine and resupplying EUELL with cocaine]." EUELL replied via text, "I got 230 cash and the rest 27 [27 grams of crack cocaine left to sell]." HARRIS replied via text, "U say u had nine bags left that night of that party." EUELL responded via text, "No, I didn't I had 9.5 grams [of cocaine]."

458. On March 27, 2014 at approximately 8:03 a.m. (Call #9121), EUELL sent another text message to HARRIS that read, "I been tried to swap lok at your text I didn't wan to say that on your phone g."

459. On March 27, 2014 at approximately 8:04 a.m. (Call #9122), HARRIS who was using Target Phone 1, received an incoming text from KESHAW EUELL, using Euell Phone 1. EUELL texted, "They say I got garbage since you didn't respond. I went ahead and put it all together. Even Pooch is fuck me up telling people I got garbage he bust me out in the store full of people [Pooch complained about the quality of the cocaine]."

April 28, 2014 (Count Ten) and May 28, 2014

460. On April 28, 2014, at approximately 8:26 a.m. (Call #24527), EUELL, who was using Euell Phone 1, sent a text message to HARRIS, who was using Target Phone 3. This message read, "Yo [give me some crack cocaine]."

461. On April 28, 2014, at approximately 8:52 a.m. (Call #1661), EUELL, who was using Euell Phone 1, had a conversation with SMITH, who was using Target Phone 4. During this conversation, EUELL stated, "He wouldn't swap me for nothing, he said get rid of it [EUELL's customer complained about the quality of the cocaine he received from EUELL, which EUELL received from HARRIS]." SMITH retorted, "Well, I don't know nothing about him [HARRIS] having something bad [poor quality cocaine]. . . Them boys still doing what they doing over there [selling crack cocaine at a steady pace on the spots]." EUELL stated, "Poochie one of them [that is complaining about the quality of the narcotics]. . . he said what they got right now is straight trash." SMITH stated, "He has a bad habit of wanting something for free." EUELL stated, "Yeah, I told Chris [HARRIS] . . . you know the man asked for his money back. . . he be fuckin' up the game, he is lucky I didn't hit him in the mouth." SMITH responded, "Goo [HERNDON] gonna kill this nigga."

462. On April 28, 2014, at approximately 9:12 a.m. (Call #24533), HARRIS, who was using Target Phone 3, had a conversation with EUELL, who was using Euell Phone 1. During this conversation, HARRIS stated, "I'm right by your car." At approximately 9:12 a.m., surveillance observed HARRIS outside of the building that EUELL lives in (as observed by surveillance on multiple occasions and as EUELL told HARRIS in previous conversation, Call #14109), 4319 West Flournoy Avenue. HARRIS walked toward the entrance of this residence, out of the sight of surveillance.

463. On April 28, 2014, at approximately 9:43 a.m. (Call #1675), EUELL, who was using Euell Phone 1, had a conversation with SMITH, who was using Target Phone 4. During this conversation, EUELL commented, "Man, this is good Green light [the narcotics she received from HARRIS were of good quality]." SMITH asked, "Oh it is?" EUELL stated, "Yeah, it look like it too." SMITH stated, "That was I be tellin' you, don't listen to what these niggas be sayin'."

464. On April 28, 2014, at approximately 10:49 a.m. (Call #24615), EUELL, who was using Euell Phone 1, sent a text message to HARRIS, who was using Target Phone 3. This message read, "When I dried your clothes it was 12.7 [EUELL is referring to the powder cocaine she received drying to 12.7 grams of crack after it was cooked into crack cocaine]. HARRIS replied via text, "I got u." EUELL replied, "Ok."

465. On April 28, 2014, at approximately 11:13 a.m. (Call #24626), EUELL, who was using Euell Phone 1, sent a text message to HARRIS, who was using Target Phone 3. This message read, "Guess who just call my phone. Brenda son Phalaruis he wants to go through me so is there any room red light or green light [EUELL is asking if HARRIS will front her cocaine

to sell to someone named Phalarius].” HARRIS replied via text, “Green.” [HARRIS is referring to he will sell her cocaine]. EUELL replied via text, “Ok what do you want me to do he want 28 [EUELL is asking HARRIS what price she should offer to sell 28 grams of cocaine]. HARRIS responded via text, “12 you make 1 I make 1 [HARRIS told her to sell the cocaine for \$1,200, so they each make a \$100 profit].” EUELL replied via text, “Ok I will tell him call u bk in a minute.” Approximately ten minutes later, EUELL sent a text that read, “I told him he said well let him get 14 [ounces of cocaine] for 6 [\$600] and he ready” [EUELL is referring to the customer getting 14 grams of cocaine for \$600]. One minute later, EUELL texted, “I’m getting the money now.” Two minutes later, EUELL texted, “About how long [before HARRIS shows up with the cocaine].” At approximately 12:32 p.m., HARRIS replied via text, “ten minutes.” At approximately 12:36 p.m., surveillance observed HARRIS exit his residence and drive in the general direction of EUELL’s residence.

466. On May 28, 2014, at approximately 1:32 p.m. HARRIS, who was using Target Phone 3 (Call #41946), received an incoming text from EUELL, who was using phone number (773)7 47-9792. This text read, “I know you dead [out of cocaine] but I have 470 [dollars] for you [from sealing crack cocaine].”

V. PROBABLE CAUSE FOR THE REQUESTED SEARCH WARRANTS

467. As set forth in this affidavit, I believe the facts establish probable cause that the defendants committed violations of Title 21, United States Code, Sections 846 and 841.

468. This affidavit is also made for the purpose of establishing probable cause in support of warrants to search the premises for Search Locations (A)-(I), (as further described below and in the various Attachment As, which contain pictures of the various locations) and to

seize the records, documents, and items (as further described in various Attachment B's).²⁵ For each computer that the government searches, the government will follow the Computer Search Protocol Outlined in the Addendum to the Attachment B's. The Search Locations are located at:

- SEARCH LOCATION A: 2758 West Adams Street, Chicago, Illinois (HARRIS's Residence Used As a Stash and Cook House);
- SEARCH LOCATION B: 4542 West Cermak Road, Chicago, Illinois (Car Wash Operated by ZAMUDIO used to sell and store narcotics);
- SEARCH LOCATION C: 4538 West Jackson Boulevard, Chicago, Illinois (HERNDON owns this building and obtained heroin from it to sell to a confidential multiple occasions and HERDON uses this as his primary residence);
- SEARCH LOCATION D: 4539 West Jackson Boulevard, Chicago, Illinois (HERNDON owns this building and sold heroin to a confidential source in it on multiple occasions);
- SEARCH LOCATION E: 716 South Kostner Avenue, Chicago, Illinois (HERNDON's residence used to store heroin);
- SEARCH LOCATION F: 5728 South Troy Avenue, Chicago, Illinois (ZAMUDIO's residence used to keep documents);
- SEARCH LOCATION G: 316 South Kilbourn Avenue, Chicago, Illinois (DTO Stash Spot Used to Serve Retail Customers);

²⁵ With the exception of Search Location F (ZAMUDIO's residence), agents are seeking search warrants to search for narcotics and narcotics-related records. Agents are seeking a records-only warrant for Search Location F. For Search Locations A, B, C, F, and H, agents are seeking permission to seize and search computers for narcotics-related records.

SEARCH LOCATION H: 547 North Lawler Avenue, Chicago, Illinois (RUSSELL's Residence); and

SEARCH LOCATION I: 348 North Avers Avenue, Chicago, Illinois (MARION's Residence).

469. As set forth in this affidavit, I believe the facts establish probable cause that the records, documents, and items (as further described in the Attachment B's) constitute fruits, instrumentalities and/or evidence of a conspiracy to distribute and distribution of controlled substances and possession and use of firearms in furtherance of drug trafficking, in violation of Title 21, United States Code, Sections 841(a), 843(b), and 846, and Title 18, United States Code, Sections 922(g)(1) and 924(c), and further that a search of Search Sites will result in the discovery of such records, documents, and items.

470. As a result of my law enforcement experience and this investigation, I am familiar with the ways in which the members of the narcotics organization conduct their business, including, but not limited to, their methods of importing and distributing narcotics, their use of numerical codes and code words to conduct their transactions in secret, and their methods of laundering the proceeds of their narcotics trafficking. Through my experience and my discussions with other experienced law enforcement officers, I am familiar with the methods, schemes, and operations used by major narcotics traffickers and know:

a. That such illegal drug traffickers commonly place assets in names other than their own to avoid detection of these assets by government agencies;

b. That even though those assets are in other person's names, the illegal drug traffickers continue to use those assets and exercise dominion and control over them;

c. That illegal drug traffickers must maintain, on hand, large amounts of United States currency, in order to maintain and finance their ongoing illegal drug trafficking business, and use money-counting machines to count the currency;

d. That illegal drug traffickers maintain books, records, receipts, notes, ledgers, and other papers relating to the transportation, ordering, sale, and distribution of illegal drugs and that such documents may be in code. That traffickers commonly “front” illegal drugs (meaning they will provide illegal drugs to their customers on consignment and the customers will pay for it at a later date). That the aforementioned books, records, receipts, notes, ledgers, etc., are commonly maintained where the illegal drug traffickers have ready access to them, i.e., homes, offices, and automobiles;

e. That it is common for illegal drug traffickers to secret contraband, proceeds of illegal drug sales, and records of illegal drug transactions, sources, and customers, in secure locations within their residences, offices, garages, storage buildings, safety deposit boxes, and other locations, including stash houses, for ready access, and also to conceal such items from law enforcement authorities;

f. That persons involved in such trafficking conceal caches of illegal drugs, large amounts of currency, financial instruments, precious metals, jewelry, and other items of value and/or proceeds of drug transactions, and evidence of financial transactions relating to obtaining, transferring, secreting, or spending large sums of money made from engaging in illegal drug trafficking activities, in their residences, offices, garages, storage buildings, automobiles, and safety deposit boxes;

g. That illegal drug traffickers commonly maintain addresses or telephone numbers in books, papers, pagers, computers, tablets or cellular phones (and often have multiple cellular phones and pagers) which reflect names, addresses, and/or telephone numbers for their associates in the trafficking organization, even if stated items may be in code;

h. That illegal drug traffickers frequently take, or cause to be taken, photographs of themselves, their associates, their property, and their product, and that these traffickers usually maintain these photographs in their residences, computers, tablets, and cellular phones;

i. That when traffickers amass large monetary proceeds from the sale of illegal drugs, they attempt to legitimize these profits by utilizing foreign and domestic banks and their attendant services, including securities, cashier's checks, money drafts, letters of credit, brokerage houses, real estate, shell corporations, business fronts and other methods;

j. That illegal drug traffickers sometimes store documents and records relating to their drug supplies, customers, money, and assets on computer hardware and software, the contents of which frequently yield evidence of trafficking and money laundering crimes;

k. That courts have recognized that unexplained wealth is probative evidence of criminal activity in which transactions involving large amounts of cash and high profit margins are common, including trafficking in controlled substances;

l. That it is common for illegal drug traffickers to use, carry, and possess firearms and ammunition in the course of their narcotics trafficking to use as protection for themselves and their proceeds and narcotics, and that it is common for illegal drug traffickers to

store and conceal such firearms and ammunition in locations that they control or own, including their own residence or place of work; and,

m. That it is common for narcotics traffickers and money launderers to conceal and store items related to their narcotics trafficking and money laundering within safes, footlockers, boxes, containers and other hidden compartments, and within places that they own or over which they exercise control.

A. Search Location A – HARRIS’s Residence and Stash House

471. The first premises to be searched is the single-family residence and detached garage located at 2758 West Adams Street, Chicago, Illinois. The residence is made of off-white vinyl siding. Its windows and doors have white trim. The front of the residence has brick steps, leading up to a stoop containing white pillars and a front door. The detached garage, made of the same material, is located behind the residence. A small backyard separates the residence from the garage.

472. Search Location A is HARRIS’s residence. Agents have seen HARRIS at this residence on dozens of occasions over the last two months. As discussed above, HARRIS uses his residence to store kilogram quantities of cocaine and crack cocaine. He then breaks the cocaine down into smaller quantities at this residence before he delivers it to GREEN at others at the 316 South Kilbourn and the alley abutting 4411 West Congress locations.

473. For example, as discussed above in paragraphs 115-124, on April 26, 2014, after REDMOND was arrested by police, HARRIS retrieved a pistol from Search Location A and, through associates, provided it to law enforcement to secure REDMOND’s release.

474. In addition, as discussed above in paragraphs 135-149, on May 15, 2014, officers observed HARRIS remove a third of “the day’s work [180 rocks of crack cocaine]” from Search Location A and distribute these narcotics to REDMOND. Officers subsequently seized these narcotics.

475. More recently, as discussed above in paragraph 332, on July 4, 2014, HARRIS purchased a kilogram of cocaine from ZAMUDIO, which was then stored in Search Location A and subsequently distributed by HARRIS to the spots after he converted it into crack cocaine. Then, at this location, he converted the cocaine to crack cocaine and distributed in smaller quantities.

476. Most recently, as discussed above in paragraphs 179-186, on July 16, 2014, officers observed HARRIS removed crack cocaine from Search Location A and distribute it to workers outside of the 316 South Kilbourn location.

B. Search Location B – ZAMUDIO’s Car Wash

477. The second premises to be searched is the Car Wash located at 4542 West Cermak Road, Chicago, Illinois. The front of the Car Wash is a brick structure without any signage. The front of the building features two sets of large five-pane windows separated by a sealed metal door. The word “Welcome” appears in graffiti on one of the windows. The machinery of the Car Wash is located in the rear. It can be accessed by entering the Car Wash through a metal gate located to the left of the structure.

478. As described above, ZAMUDIO used Search Location B as a meeting place to discuss illegal activities with HARRIS and others. Further, HARRIS uses this location as a hang out and often supplies narcotics to individuals at this location. For example, as discussed in

paragraphs 58-69, on February 19, 2014, HARRIS instructed REDMOND to meet him at this location to receive narcotics. As discussed in paragraph 95, on March 28, 2014, HARRIS instructed GREEN to meet him at this location to deliver guns to the DTO.

479. As further discussed above, CS-4 conducted four controlled purchases from ZAMUDIO at Search Location B. The buys include: (1) April 16, 2014 controlled purchase of approximately 146 grams of marijuana; (2) May 1, 2014 controlled purchase of 27 grams of heroin; (3) May 7, 2014 controlled purchase of approximately 107 grams of heroin; (4) May 13, controlled purchase of 86 grams of heroin; and a June 13, 2014 purchase of a .22 caliber pistol.

480. Given that the Car Wash is a business, based on my training and experience, I would expect that Car Wash to have a computer, which may contain records relating to ZAMUDIO's narcotics sales.

C. Search Location C -- HERNDON's Residence

481. The third premises to be searched is the residence located at 4538 West Jackson Boulevard, Chicago, Illinois. This residence is four stories tall and constructed out of yellow brick. According to CS-4, this residence was a converted three flat that was made into a single residence. It has three doors on the front of the building. It is obstructed by a small wrought iron fence. It has eight sets of windows with white trim. There is a detached garage located behind the residence.

482. According to both CS-1 and CS-4, HERNDON lives at Search Location C. According to Illinois Secretary of State ("ISOS") records, the property tax bill for this property is in HERNDON's name. In addition, on July 24, 2014, at approximately 7:37 p.m. (Call #12698), SMITH received a phone call from a would-be real estate investor asking about buying

properties on Jackson Boulevard. During this conversation, the speculator asked, “Do you know GOO’s [HERNDON] address?” SMITH replied, “At what, on Jackson?” The speculator stated, “Yeah.” SMITH answered, “4538.”

483. As noted above in paragraph 408, surveillance observed HERNDON entered Search location C to obtain heroin, which he sold to CS-4 on April 12, 2014. Also, as discussed in paragraphs 422-425. HERNDON obtained a sample of heroin from Search Location C, which he gave to CS-4 on July 15, 2014. Further, as discussed in paragraph 419, HERNDON sold heroin to CS-4 inside of Search Location C on June 4, 2014.

484. More importantly, as HERNDON’s main residence, based on my training and experience, there is probable cause to believe that HERNDON may keep records relating to his narcotics trafficking, either in appear form or on computer. In addition, HERNDON is likely to keep records relating to his property and other investments, which is evidence of the laundering of his narcotics proceeds, at this location.

D. Search Location D -- HERNDON’s Wholesale Sales Location

485. The fourth premises to be searched is the residence located at 4539 West Jackson Boulevard, Chicago, Illinois. This location is a residence that is three stories tall, including a basement. It is made out of red brick, has three sets of windows, and a white door slightly offset to the left. It is protected by a short metal fence. The numbers 4539 appear above the door.

486. This investigation has revealed that 4539 is a residence owned by HERNDON that he is in the process of rehabbing (as HERNDON discussed during undercover recordings with CS-4). Surveillance has seen HERNDON at this residence on numerous occasions over the

past two months. According to ISOS records, both the deed and the property tax bill are in HERNDON's name.

487. As discussed above, HERNDON and CS-4 have conducted the majority of their heroin transactions at this location. As discussed in paragraph 408, on April 12, 2014, HERNDON sold CS-4 approximately 59 grams of heroin at this location. As discussed in paragraph 414, on April 16, 2014, HERNDON sold CS-4 approximately 151 grams of heroin at this location. As discussed in paragraph 419, on June 4, 2014, HERNDON sold CS-4 approximately 58 grams of heroin at this location. As discussed in paragraphs 422-423, on July 15, 2014, HERNDON gave CS-4 approximately heroin at this location.

E. Search Location E -- HERNDON's Stash House for Large Quantities of Heroin

488. The fifth premises to be search is located at 716 South Kostner Avenue, Chicago, Illinois. This premises is a three-story residence, including a basement, made out of greyish brown brick. It has four windows on the top floor and three windows on the main floor. Cement steps lead up to the entrance, which is an ornate wooden door. The front of the building is protected by a wrought iron fence. There is a detached garage located behind the residence.

489. This investigation has revealed that Search Location E is where HERNDON stores his larger quantities of heroin. According to ISOS records, both the deed and the property tax bill are in HERNDON's name. According to People's Gas records, HERNDON receives a gas bill for this location.

490. As discussed above in paragraph 414, HERNDON stored and retrieved approximately 150 grams of heroin at this location, which he sold to CS-4 on April 16, 2014. As

discussed above in paragraph 425, HERNDON stored and retrieved approximately 150 grams of heroin at this location, which he sold to CS-4 on July 15, 2014.

F. Search Location F – ZAMUDIO’s Residence

491. The sixth premises to be search is located at 5728 South Troy Avenue, Chicago, Illinois. This residence is a single-family home, and consists of three stories including a basement. It is made out of brick and has white trim. The front door is offset to the right, up a set of stairs and to the left of a small porch. Small shrubbery and clay pots adorn the front base of the house. There is a detached garage located behind the residence.

492. This investigation has revealed that Search Location F is ZAMUDIO’s residence. As discussed above in paragraph 325, on July 4, 2014, surveillance observed ZAMUDIO at this residence with a black case prior to meeting with HARRIS and selling him a kilogram of cocaine. According to ISOS records, two individuals with the last name ZAMUDIO (believed to be ZAMUDIO’s parents) are the deed holders for this residence. Further, as discussed above in footnote 18, ZAMUDIO told law enforcement that Search Location F was his residence and produced a state identified card listing Search Location F as his residence.

493. Based on my training and experience, given the access that ZAMUDIO has to large quantities of heroin and cocaine, combined with the fact that ZAMUDIO operates a cash business, namely the Car Wash, means that there is probable cause to believe that ZAMUDIO may keep records of his narcotics and money laundering related activity in paper or electronic form on a computer at his residence.

G. Search Location G -- The HERNDON DTO's Main Drug Spot

494. The seventh premises to be searched is located at 316 South Kilbourn Avenue, Chicago, Illinois. This residence is constructed out of large grey stones. It is three stories, including a basement. Wooden steps lead up to the front door, which is white and has the numerals "316" over it. There are two small alley-ways on either side of the building.

495. Based on the investigation, Search Location G is O'LEARY's residence. In fact, the picture attached to Attachment A for this search warrant application, taken July 16, 2014, shows O'LEARY sitting on the front porch smiling with the door to the location open.

496. The investigation has revealed that this is the DTO's main sales location. The spot manager would sit on the porch of the residence or in a nearby vehicle and direct customers and workers, who would conduct transactions in the alleyways on either side of the residence. This spot has operated as a crack cocaine spot for years. The investigation has shown that crack cocaine is often stored inside the residence itself, and doled out to workers who sell their allotment quickly. For example, as discussed above, on April 9, 2014, O'LEARY retrieved crack cocaine from inside this residence prior to selling it to an undercover officer. In addition, as discussed above in paragraphs 179-186, HARRIS supplied crack cocaine to EDWARDS outside Search Location G as recently as July 16, 2014. Surveillance then observed EDWARDS enter this location.

H. Search Location H -- RUSSELL's Residence

497. The eighth premises to be searched is located at 547 North Lawler Avenue, Chicago, Illinois. It is a three-story red brick structure, including a basement. There is a small tree directly in front of the house and an alley to its right side if you are facing the residence. Its

windows have white brick. The door is black and offset to the right-center of the house, located at the top of a set of cement stairs.

498. This investigation has shown that Search Location H is RUSSELL's residence. As discussed above in paragraph 369, during a traffic stop on March 24, 2014, RUSSELL told officers that this was his residence. In addition, ISOS records show that someone with the last name RUSSELL, believed to be RUSSELL's father, is the deed holder for this residence.

499. The investigation has also showed that RUSSELL stores cocaine at his residence. For example, as discussed in paragraph 377 above, on July 24, 2014, agents intercepted text messages between HARRIS and RUSSELL during which RUSSELL agreed to sell HARRIS 63 grams of cocaine. RUSSELL then left his residence and was stopped two minutes later. Officers recovered 63 grams of cocaine from RUSSELL during this stop.

I. Search Location I – MARION's Residence

500. The ninth premises to be searched is located at 348 North Avers Avenue, Chicago, Illinois. This location is a three story brick residence, including a basement. It has three large windows. Its entrance, a big white door, is located on the front right side of the residence at the top of cement steps with wooden railings.

501. This investigation has revealed that this location is MARION's residence, which MARION uses to store narcotics. Surveillance observed MARION at this residence on several occasions and, as discussed above in paragraphs 140, surveillance observed HARRIS meet GREEN outside of this residence after arranging to meeting at "Darven's" residence. Darven refers to this residence as his residence house as discussed above in paragraph 311. Further, as discussed above in paragraph 387, MARION sold crack cocaine to a confidential source at this

residence on May 7, 2013. More recently, as discussed above in paragraphs 389-400, MARION sold cocaine to SMITH at this residence on July 22, 2014.

VI. CONCLUSION

502. Based on the foregoing, there is probable cause to believe that:

a. Beginning no later than in or about 2013, and continuing until the present, at Chicago, in the Northern District of Illinois, the following Individuals did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and to distribute controlled substances, namely, 280 grams or more of mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846:

JOHNNY HERNDON, also known as (“aka”) “Goo” (HERNDON);
CHRISTOPHER HARRIS, (HARRIS);
JONATHAN GREEN, aka “Whiteboy” and “Whitey” (GREEN);
FABIAN REDMOND, aka “Mook” (REDMOND);
JONATHAN O’LEARY, aka “JB” (O’LEARY);
ANTWAION EDWARDS, aka “Fee” (EDWARDS);
MARCUS LONGSTREET, aka “Chico” (LONGSTREET);
MANUEL MEEKS, aka “Big Shorty” (MEEKS);
CAUIRENCE HERNDON, aka “C” and “G” (CAUIRENCE);
DeSHAWN RICHARDSON, aka “Shawn,” “Little Lord” and “D” (RICHARDSON);
ANDREW JONES, aka “Crowbar” (JONES); and
PATRICIA NEAL (NEAL).

b. On or about June 7, 2014, CHRISTOPHER HARRIS, at Chicago, in the Northern District of Illinois, Eastern Division, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded silver Rossi, Amadeo & Co. .357 caliber revolver bearing serial number F063110, which firearm had traveled in interstate

commerce prior to defendant's possession of the firearm, in violation of Title 18, United States Code, Section 922(g)(1).

c. On or about April 16, 2014, JOHNNY HERNDON, at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixtures and substances containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

d. On or about May 7, 2014, EDUARDO ZAMUDIO, aka "Lalo" (ZAMUDIO), at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixtures and substances containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

e. On or about July 24, 2014, ROBERT RUSSELL, aka "Hurk" (RUSSELL), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

f. On or about May 1, 2014, ROBERT SMITH, aka "Bo" (SMITH), at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, 28 grams or more of a mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

g. On or about May 1, 2014, DARRYL JONES, aka "Heavy" (DARRYL), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the

intent to distribute a controlled substance, namely, 28 grams or more of a mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

h. On or about May 1, 2014, MILDRED SMITH, at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute controlled substances, namely, a quantity of mixtures and substances containing cocaine base and a quantity of mixtures and substances containing cocaine, Schedule II Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1).

i. On or about April 26, 2014, HARRY SMITH (HARRY), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of mixtures and substances containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

j. On or about April 28, 2014, KESHAW EUELL (EUELL), at Chicago, in the Northern District of Illinois, knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, a quantity of a mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

k. On or about July 22, 2014, DARVEN MARION (MARION), at Chicago, in the Northern District of Illinois, knowingly and intentionally distributed a controlled substance, namely, a quantity of a mixtures and substances containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

Graham R. Grafton
Special Agent
ATF

Sworn and subscribed to before me on this
6th day of August, 2014

Michael T. Mason
United States Magistrate Judge