

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CASE NUMBER: 14 CR 588
UNDER SEAL

JASON MAREK,
also known as “Murder” and “Murda”;
THADIEUS GOODS,
also known as “Big Weasy,” “Weasy,”
and “Wang”;
LAVANGELIST POWELL,
also known as “Ju Ju” and “Juicy”;
PRINCE JOHNSON,
also known as “Primo”;
PEARLISA STEVENSON,
also known as “Wang Wang”;
NATOSHA MCCOLLUM,
also known as “Tasha”; and
STEPHANIE LEWIS

CRIMINAL COMPLAINT

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

COUNT ONE

From on or about June 15, 2013 to on or about June 24, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere, defendants JASON MAREK, also known as “Murder” and “Murda”; THADIEUS GOODS, also known as “Big Weasy,” “Weasy,” and “Wang”; LAVANGELIST POWELL, also known as “Ju Ju” and “Juicy”; PRINCE JOHNSON, also known as “Primo”; PEARLISA STEVENSON, also known as “Wang Wang”; and NATOSHA MCCOLLUM, also known as “Tasha” conspired with each other and with others known and unknown to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, namely, marijuana, in violation of 21 U.S.C. § 846.

COUNT TWO

On or about June 24, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, defendant STEPHANIE LEWIS accessed a computer without authorization and exceeded authorized access to obtain information in furtherance of a criminal act in violation of the Constitution or laws of the United States, namely, violations of 18 U.S.C. § 1951 and 21 U.S.C. § 846, in violation of 18 U.S.C. § 1030(a)(2)(B).

COUNT THREE

From on or about June 22, 2013 to on or about June 24, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, defendants LAVANGELIST POWELL, also known as “Ju Ju” and “Juicy”; PRINCE JOHNSON, also known as “Primo”; PEARLISA STEVENSON, also known as “Wang Wang”; NATOSHA McCOLLUM, also known as “Tasha”; and STEPHANIE LEWIS conspired with each other to access a computer without authorization and to exceed authorized access to obtain information in furtherance of a criminal act in violation of the Constitution or law of the United States, namely, violations of 18 U.S.C. § 1951 and 21 U.S.C. § 846, in violation of 18 U.S.C. § 1030(b).

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.

BRYAN BUTLER
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: October 20, 2014

City and state: Chicago, Illinois

Judge's signature

JEFFREY T. GILBERT, U.S. Magistrate Judge
Printed name and Title

AFFIDAVIT

I, BRYAN BUTLER, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for four years. My current responsibilities include the investigation of public corruption offenses.

2. This affidavit is submitted in support of a criminal complaint alleging that:

a. JASON MAREK, also known as “Murder” and “Murda” (MAREK); THADIEUS GOODS, aka “Big Weasy,” “Weasy,” and “Wang”; LAVANGELIST POWELL, aka “Ju Ju” and “Juicy”; PRINCE JOHNSON, aka “Primo”; PEARLISA STEVENSON, aka “Wang Wang”; and NATOSHA McCOLLUM, aka “Tasha” conspired with each other and with others known and unknown to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, namely, marijuana, in violation of 21 U.S.C. § 846;

b. STEPHANIE LEWIS accessed a computer without authorization and exceeded authorized access to obtain information in furtherance of a criminal act in violation of the Constitution or laws of the United States, namely, violations of 18 U.S.C. § 1951 and 21 U.S.C. § 846, in violation of 18 U.S.C. § 1030(a)(2)(B); and

c. POWELL, JOHNSON, McCOLLUM, and LEWIS conspired with each other to access a computer without authorization and to exceed authorized access to obtain information in furtherance of a criminal act in violation of the Constitution or law of the United States, namely, violations of 18 U.S.C. § 1951 and 21 U.S.C. § 846, in violation of 18 U.S.C. § 1030(b).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging (1) MAREK, GOODS, POWELL, JOHNSON, STEVENSON, and McCOLLUM with conspiracy to distribute a controlled substance, (2) LEWIS with unauthorized access and exceeding authorized access of a computer; and (3) POWELL, JOHNSON, McCOLLUM, and LEWIS with conspiracy to access without authorization and to exceed authorized access to a computer, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offenses alleged in the complaint.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement officials, interviews of witnesses, review of consensually-recorded conversations and telephone calls placed by inmates within Cook County Jail, review of public records databases, and my training and experience as a law enforcement agent.

5. This investigation included the use of consensually-recorded telephone calls, audio recorded, and audio and video recorded meetings. The summaries of

recorded conversations in this affidavit do not include reference to all of the topics discussed during the conversations. Further, quoted material from the recorded conversations set out in this affidavit is taken from draft summaries, not final transcripts.

6. In many of the paragraphs describing consensually-recorded conversations, either over the phone or in person, interpretations of the discussion are included in brackets. These interpretations include meanings attributed to code words, coded language, or vague references used by speakers. My understanding and interpretation of the conversations is based upon the contents of the conversations, the context of prior and subsequent conversations, the events that transpired in this investigation, my knowledge derived from this investigation, my experience and training as a law enforcement agent and the experience and training of other law enforcement participating in this and other investigations, including narcotics investigations, and my conversations with witnesses involved in this case. The times listed for these recordings are approximate. In most cases, voice identifications are based on names used during the conversations, voice recognition that has been accomplished to date by law enforcement officers and by the Securus voice-biometric system, historical information developed during this investigation, and/or telephone subscriber information. Finally, the summaries below do not include all recordings, or all statements or topics covered during the course of the conversations.

I. OVERVIEW OF THE DEFENDANTS

7. According to training records obtained from Cook County Department of Corrections, MAREK has been employed as a Corrections Officer by the Department of Corrections since May 2011. On July 26, 2011, the Illinois Law Enforcement Training and Standards Board authorized MAREK to carry out “sworn duties as a peace officer in the State of Illinois.” According to recorded calls and the events that transpired during this investigation, STEVENSON and GOODS referred to MAREK by the nicknames “Murder” and “Murda.”

8. According to Department of Corrections personnel, Correctional Officers receive their assignments on a ninety-day periodic basis. Although an officer may be assigned to a location for a ninety-day period, the officer can receive daily ad-hoc reassignments. In June 2013, MAREK’s ninety-day periodic assignment was CCJ, Division 9, Tier 2H. During that period, MAREK worked an evening shift from 3:00 p.m. to 11:00 p.m.

9. According to Cook County Sheriff’s Office Inmate Classification Records, GOODS was an inmate at CCJ from approximately July 6, 2007 to February 11, 2014, on pending charges of murder. From June 30, 2012 to July 2, 2013, GOODS was housed in Division 9 on Tier 2H. According to Illinois State Police criminal history records, on or about February 10, 2014, GOODS was convicted of murder, in violation of 720 ILCS 5/9-1(A)(2), and received a sentence of sixty-five years’ imprisonment. According to a Chicago Police Department Identification Section criminal history report and recorded jail calls, GOODS uses

the aliases “Big Weasy,” “Weasy,” and “Wa.” According to statements made by GOODS during recorded jail calls, GOODS is married to STEVENSON, who uses the nickname “Wang-Wang.”

10. According to Cook County Sheriff’s Office Inmate Classification Records, POWELL has been an inmate at CCJ since approximately January 13, 2013, on pending charges of solicitation / murder; and from January 14, 2013 to September 13, 2013, POWELL was housed in Division 9, Tier 2H of CCJ. According to recorded telephone calls, POWELL uses the aliases “Ju-Ju” and “Juicy.” According to statements made by POWELL during recorded jail calls, including a call described in paragraph 29 below, POWELL is in a romantic relationship with McCOLLUM.

11. According to Cook County Sheriff’s Office Inmate Classification Records, JOHNSON has been an inmate at CCJ since approximately August 7, 2007, on pending charges of Intent to Commit First Degree Murder; and from March 8, 2013 to February 14, 2014, JOHNSON was housed in Division 9 on Tier 2H. According to recorded jail calls, JOHNSON uses the alias “Primo.” According to statements made by JOHNSON during recorded jail calls, JOHNSON is in a romantic relationship with LEWIS.

12. According to the City of Chicago employee directory, LEWIS is a “Supervisor Police Operations” in the Police Dispatch workgroup of the City of Chicago Office of Emergency Management and Communications.

II. OVERVIEW OF THE INVESTIGATION

13. As discussed more fully below, from at least approximately June 15, 2013 through June 24, 2013, CCJ inmates GOODS, JOHNSON, and POWELL, who were housed in the same tier within CCJ, conspired with civilians STEVENSON and McCOLLUM to bribe CCJ Correctional Officer MAREK to bring marijuana, cigarettes, tobacco, alcohol, food and other contraband into CCJ for inmates' consumption and for further distribution within CCJ.

14. More specifically, as described more fully below, inmates GOODS and POWELL pre-sold marijuana to inmates within CCJ. On June 17 and 19, 2013, inmates transferred funds to civilians STEVENSON and McCOLLUM via the CCJ Inmate Trust Account system. I believe the payments made by the other inmates were for the purchase of marijuana and other contraband, which GOODS, POWELL, and JOHNSON expected to be brought into CCJ. After collecting the money from other inmates at CCJ, McCOLLUM and STEVENSON discussed with GOODS and POWELL their efforts to purchase marijuana from drug dealers outside of CCJ. Additionally, JOHNSON and civilian LEWIS coordinated the delivery of contraband to STEVENSON for delivery into CCJ. On June 21, 2013, STEVENSON delivered the marijuana and other contraband to MAREK. At the same time, McCOLLUM and STEVENSON paid MAREK a \$200 bribe to smuggle the marijuana and other contraband into CCJ. After accepting the bribe money, MAREK carried the contraband into CCJ and attempted to deliver it to GOODS, but was stopped by law enforcement.

15. As also described more fully below, after MAREK failed to deliver the marijuana and contraband, GOODS, POWELL, and JOHNSON worked with McCOLLUM and LEWIS, an employee of the City of Chicago Office of Emergency Management and Communications, to obtain MAREK's home address and information about his family in order to threaten MAREK and convince him to bring additional contraband into CCJ. Specifically, JOHNSON contacted LEWIS and informed her that MAREK had failed to deliver contraband despite having accepted a bribe and asked LEWIS to provide MAREK's personal information, including his home address and names of family members, because JOHNSON and GOODS planned to send their associates to MAREK's house. After receiving MAREK's license plate number from McCOLLUM, LEWIS conducted an inquiry of MAREK's license plate on an OEMC computer to the Illinois State Police Law Enforcement Agencies Database, which queried the National Crime Information Center database. LEWIS then provided MAREK's home address to JOHNSON.

III. COOK COUNTY JAIL

A. Division 9

16. According to the Cook County Sheriff's Office website, Division 9 of CCJ is located at 2834 W. 31st Street, Chicago, Illinois 60608. Division 9 is comprised of two interconnected three-story buildings, and it houses general population male inmates with a maximum security classification.

17. According to a floor plan of the CCJ, Tier 2H is located on the second floor of the South Tower of Division 9.

B. Inmate Trust Accounts

18. The Department of Corrections Finance and Trust Account Business Manager described the Inmate Trust Account system at CCJ as follows:

a. During the CCJ intake process, all incoming inmates are provided a Trust Account, which functions as the inmate's bank account while at CCJ. The inmate can use money in this account to purchase items from the CCJ commissary such as soap, greeting cards, or snacks.

b. Anyone may deposit funds and withdraw funds from an Inmate Trust Account. Funds can be deposited into a Trust Account using three means: (1) wire transfer; (2) money orders for \$100 or less; or (3) cashier's check. Funds can be debited from the account through purchases from the CCJ's commissary or withdrawn from a Trust Account by a third party with the inmate's approval, as described below.

c. Inmates can transfer money from their Trust Accounts to individuals who are not incarcerated. This is done by "third party checks" issued by CCJ. The process for a third party withdrawal is as follows:

i. First, the third party recipient visits the division of the CCJ where the inmate is housed and asks a Correctional Rehabilitation Worker for an "Authorization to Release Funds" form. The Correctional Rehabilitation Worker then fills out the form for the third party, indicating the inmate's name and identification number and how much money is to be released from the inmate's Trust Account. The Correctional Rehabilitation Worker also fills in the name of the

third party recipient, his/her relationship to the inmate and identifying information of the third party recipient, such as a driver's license number. The Correctional Rehabilitation Worker then takes the third party recipient's driver's license and the Authorization to Release Funds form to the inmate. If the inmate approves of the withdrawal, he/she signs the form. The Correctional Rehabilitation Worker witnesses the inmate's signature. The third party recipient also signs the form.

ii. Second, the third party recipient takes the signed Authorization to Release Funds form and his/her identification to the Discharge Payout office located in the lobby of Division 5. If the information on the form and the third party recipient's driver's license match, CCJ will issue a check to the third party. The third party recipient of the check signs a form acknowledging receipt of the check. The CCJ employee issuing the check also signs this form. Copies of the Authorization to Release Funds and issued check stubs are maintained by CCJ.

19. As discussed below, CCJ inmates use money from their Trust Accounts to purchase contraband, including marijuana, within CCJ. Based on information developed during this and other investigations, including interviews of former CCH inmates and recorded conversations, marijuana sold within CCJ commands approximately five to ten times the current street value.

C. Securus Telephone System

20. According to information provided by CCJ officials, phone calls made by CCJ inmates are recorded and maintained by a third party vendor, Securus Technologies. When an inmate arrives at CCJ, he is provided a Securus account

and PIN number to make outgoing telephone calls. The Securus PIN number matches the inmate's CCJ identification number.

21. The Securus telephone system uses voice-biometrics. The system only allows an inmate to place a call if the voice of the caller matches the account holder's enrollment. An enrollment is a recording of an account holder's (inmate's) voice. The enrollment is recorded during the registration process, when the inmate records his/her voice by stating his/her name.

22. To make a call, an inmate must input their PIN and state their name. If the voice of the speaker does not match the prior enrollment for the account, the system will not allow the call to be completed.

23. CCJ's institutional phones cannot accept incoming calls.

24. When booked into CCJ, inmates receive a copy of the CCJ inmate handbook, which sets forth the rules and regulations for inmates at CCJ. The handbook states that all institutional phone calls may be recorded or monitored.

25. At the outset of each call made on CCJ's institutional phones, an automated message informs the call recipient of the caller's identification and that the call originated from the Department of Corrections. The automated recording begins by stating, "Hello, this is a . . . call from [Inmate name], an inmate at the Cook County Department of Corrections, in Chicago, Illinois." At the point which the automated recording provides the inmate's name, the system plays a pre-recorded audio clip of the inmate stating his/her name. The automated message then continues to warn both parties that the call may be monitored and recorded.

26. According to a CCJ official, institutional phone calls from CCJ are paid for in three ways: (1) an inmate may make a collect call if the call recipient has a land-based telephone line; (2) an inmate may use pre-paid calling cards; and (3) individuals outside of CCJ can establish pre-paid accounts through which phone calls can be accepted and paid. When inmates are first booked into CCJ, they receive approximately twenty minutes of free phone calls.

IV. GOODS, POWELL, AND JOHNSON COORDINATE THE DELIVERY OF MARIJUANA AND CONTRABAND TO CCJ WITH STEVENSON, MCCOLLUM, AND LEWIS

27. On Saturday June 15, 2013, at approximately 3:29 p.m., GOODS¹ placed a recorded telephone call from CCJ, Division 9, Tier 2H to telephone number (XXX) XXX-7452, used by STEVENSON.² During the call, GOODS informed STEVENSON that, with her help, he had the opportunity to make some money by

¹ The identity of GOODS as the speaker in this and other telephone calls in this affidavit is based on, among other things, the following: (1) the calls are placed using the Securus account registered to GOODS; (2) the biometric voice recognition system allowed the user of GOODS's Securus account to place the call, meaning that the voice of the caller matched the account holder's enrollment recording; (3) the enrollment recording at the beginning of all calls made from this Securus account states, "Big Weasy," which is GOODS's nickname; (4) at least one prior enrollment recording for GOODS's Securus account stated, "THADIEUS GOODS"; and (5) I have compared the voice of the speaker using this Securus account with consensually-recorded, in-person conversations involving GOODS and recognize the voice of the speaker using this Securus account as belonging to GOODS.

² The identity of STEVENSON as the speaker and user of telephone number (XXX) XXX-7452 in this affidavit is based on, among other things, the following: (1) according to subscriber records, telephone number (XXX) XXX-7452 is subscribed to Pearlisa Stevenson at a particular address in Lafayette, Indiana; (2) in a consensually recorded call that occurred on July 2, 2013, the user of telephone number (XXX) XXX-7452 was asked, "Hey, is this Pearl?" The user of telephone number (XXX) XXX-7452 responded, "Uh-huh"; (3) according to records obtained from Securus, (XXX) XXX-7452 is registered to "Pearl Stevenson" at a particular address on West 70th Street in Chicago, Illinois; (4) according to Illinois Secretary of State records, the same address on West 70th Street in Chicago is STEVENSON's registered driver's license address; and (5) on June 21, 2013, law enforcement familiar with STEVENSON's appearance observed STEVENSON walking out of the apartment complex located at the same address in Chicago, Illinois.

selling marijuana, which he referred to as “28” [meaning 28 grams or an ounce], inside CCJ as long as he also had a CCJ corrections officer willing to help him. Specifically, GOODS said, “I’m really just trying to take care this business and put a mother fucker in a couple of positions, that I ain’t gotta worry about money. That’s my job... You, know, I ain’t out there [outside of CCJ], ... to do it, so I’m gonna do it from in here [inside CCJ]. ... I gotta chance, ...to make shit happen and make a little money, you know what’s goin’ on—you see how it’s crackin’. ... That shit don’t come that often... Motherfucker, I’m talking about, would kill to be in the position I’m in right now... Certain motherfuckers I know, because of what certain motherfuckers will do. You know what’s crackin’. I just need you to be there...on point because as long as the motherfucker, you know what I’m sayin’, have that cop [CCJ corrections officer], you know what I’m sayin’, the good buddy, we can make a little bread [money]. It’s all good now, you gonna get it crackin.’ I’m talkin’ about—let me see...uh, 28 [grams, or an ounce of marijuana]. You know what I’m sayin’? Then...” STEVENSON responded, “Mmmhmm.”

28. As the call continued, GOODS made statements that I interpret to mean that while 28 grams of marijuana outside of CCJ sells for approximately \$200, it sells inside of CCJ for \$1,000. GOODS further made statements that I interpret to mean that he intended to collect as much money from other inmates as he could. Specifically, GOODS said, “A 28 [grams of marijuana]. This...this, check this out. A 28 [grams of marijuana] out there [outside of CCJ], a motherfucker might check, ... somethin’ like 200 [\$200]. You know what I’m saying, probably a

little over 200 [\$200]. In here, ... a 28 [grams of marijuana] a motherfucker gonna check, ... a stack [\$1,000]. It's simple. It's crazy, but it's true. You know, so, my whole thing be, I'm getting, I'm, I'm getting every dime every motherfucker's [other CCJ inmates] got—got it to give, come on with it. We need that.”

29. The following evening, on Sunday, June 16, 2013, at approximately 9:07 p.m., POWELL³ placed a recorded call from Division 9, Tier 2H to telephone number (XXX) XXX-2544, used by McCOLLUM.⁴ During the conversation, McCOLLUM made statements that I interpret to mean that she was in a better position than POWELL to conduct illegal activity outside of CCJ and that she was concerned that other inmates inside CCJ might provide information to law enforcement regarding POWELL's criminal activities, which could result in law

³ The identity of POWELL as the speaker in this and other telephone calls in this affidavit is based on, among other things, the following: (1) the calls are placed using the Securus account registered to POWELL; (2) the biometric voice recognition system allowed the user of POWELL's Securus account to place the call, meaning that the voice of the caller matched the account holder's enrollment recording; (3) the enrollment recording at the beginning of all calls made from this Securus account states, “Lavangelis Powell”; and (4) on June 21, 2013, at approximately 4:26 p.m., in a recorded call placed from CCJ using POWELL's Securus account, the male speaker using POWELL's account is called “Lavangelis” by McCOLLUM, the female recipient of the call.

⁴ The identity of McCOLLUM as the speaker and user of telephone number (XXX) XXX-2544 in this affidavit is based on, among other things, the following: (1) according to subscriber records, telephone number (XXX) XXX-2544 is subscribed to Natosha McCOLLUM at a particular address on Harper in Chicago, Illinois; (2) on June 20, 2013 and August 3, 2013, law enforcement familiar with McCOLLUM's appearance observed McCOLLUM in a vehicle registered to an individual at that same Harper address near that particular Harper address in Chicago, Illinois; (3) in a recorded telephone call from CCJ to telephone number (XXX) XXX-2544 on June 16, 2013 at 9:41 p.m., the female user of telephone number (XXX) XXX-2544 said, “My name is Natosha[;]” and (4) in a recorded conversation from CCJ to telephone number (XXX) XXX-2544 on June 16, 2013, at 9:07 p.m., the same female user of telephone number (XXX) XXX-2544 said that her home was on “Harper.”

enforcement investigation of POWELL. Specifically, McCOLLUM said, "I'm not even gonna lie babe. I'm not gonna lie. By me being...your bitch, I'm supposed to be worried about you. I'm supposed to be talkin' to people [coordinating criminal activity with POWELL's associates] you not talkin' to. You feel me?" POWELL says, "Yeah." McCOLLUM says, "Like, you know, I'm supposed to be here to pick up yo' slack and from the outside [of CCJ] lookin' in, baby. Like ya'll in there [CCJ]. You feel me? Mother fuckers [POWELL's associates] be mad, be mad, and I don't want no mother fucker to just be like, man, well wo-wo-wo-wo-wo [provide information to law enforcement]. You feel me?" POWELL says, "Mm-hm." McCOLLUM says, "And then they come shake shit [take law enforcement action]. You know, like?" POWELL says, "Right."

30. The same night, June 16, 2013, at approximately 9:41 p.m., POWELL placed a recorded call from CCJ, Division 9 on Tier 2H to telephone number (XXX) XXX-2544, used by McCOLLUM. During the call, POWELL can be heard speaking to another individual in the background. He said, "They gotta' know their names, like, of the people" and "[t]hey on this deck [tier within CCJ], right?" I believe POWELL was ensuring that the inmates purchasing drugs within CCJ knew who to direct their payments to via the third-party check system. As the call continued, McCOLLUM and POWELL made statements that I understand to refer to plans for McCOLLUM and STEVENSON to pick up third party commissary checks from the Trust Accounts of CCJ inmates the following morning. Specifically, POWELL said, "Look, you all come and get money off everybody [from their CCJ Trust Accounts],

everybody but this, but this nigger named [Inmate A].” McCOLLUM says, “So don’t get [Inmate A’s] money?” POWELL says, “No.” McCOLLUM says, “Okay, but the other, but the other people get it off?” POWELL says, “Yeah. What time you want me to call you tomorrow?” McCOLLUM says, “Um, I’m going to be down there exactly at nine o’clock. I’m gonna get her [STEVENSON] at 8:30.”

31. On June 17, 2013 at approximately 6:54 p.m., JOHNSON⁵ placed a recorded call from Division 9 in CCJ to telephone number (XXX) XXX-1593, used by LEWIS.⁶ During the call, JOHNSON directed LEWIS to place a three-way call to STEVENSON, whom JOHNSON identified as “Wang Wang.” During the three-way call, JOHNSON relayed a message about money from GOODS to STEVENSON.

⁵ The identity of JOHNSON as the speaker in this and other telephone calls in this affidavit is based on, among other things, the following: (1) the calls are placed using the Securus account registered to JOHNSON; (2) the biometric voice recognition system allowed the user of JOHNSON’s Securus account to place the call, meaning that the voice of the caller matched the account holder’s enrollment recording; (3) the enrollment recording at the beginning of all calls made from this Securus account states, “Prince Johnson”; (4) in a call recorded on June 23, 2013, at approximately 8:12 p.m., the user of JOHNSON’s Securus account identified himself as “Uncle Prince”; and (5) I have compared the voice of the speaker in the June 23, 2013 call with the voice of the speaker in other recorded conversations using this Securus account and recognize the voice as belonging to the same person.

⁶ The identity of LEWIS as the speaker and user of telephone number (XXX) XXX-1593 in this affidavit is based on, among other things, the following: (1) according to subscriber records, telephone number (XXX) XXX-1593 is subscribed to Stephanie N. Lewis, with a date of birth of XX/XX/1974 at a particular address on Muskegon Avenue in Chicago, Illinois; (2) according to Illinois Secretary of State records, LEWIS’s address is identified as the particular address on Muskegon Avenue in Chicago and her birthday is also XX/XX/1974; and (3) on June 22, 2013, at approximately 9:59 p.m., JOHNSON placed a recorded call from CCJ, Division 9, Tier 2H to telephone number (XXX) XXX-1593. During the call, the female voice using telephone number (XXX) XXX-1593 is heard self-identifying herself in the background, stating, “Supervisor Lewis, can I help you?” As mentioned above, according to a City of Chicago employee directory, LEWIS is a “Supervisor Police Operations” in the Police Dispatch workgroup of the OEMC. In another call, LEWIS also identified herself as being thirty-nine years old.

JOHNSON then made statements that I interpret as informing LEWIS that he was going to be doing business with GOODS. Specifically, STEVENSON answered, "Hello?" JOHNSON said, "Hey, Wang Wang [STEVENSON]. This Primo [JOHNSON]. Uh, Weasy [GOODS] say take the hundred [\$100], put it to the side. Take that odd eighty [\$80] or whatever it is, put it on the phone right now. He come back out tonight. At 10 o'clock, he's going to call [U/I] 9:30." STEVENSON said, "Okay." JOHNSON then spoke to LEWIS, "You hear me?" LEWIS said "Yeah." JOHNSON said, "That number [STEVENSON's phone number], um, don't lose that number, you hear me?" LEWIS said, "Uh huh. Okay." JOHNSON then explained, "Because, that call I just made for that guy [GOODS] that I be doing a little business with [arranging to smuggle contraband into CCJ]. He's very untrustworthy so, you know" LEWIS said, "Mm-hm. Okay." JOHNSON then said, "So, I'll be needing, needing access and shit."

32. On June 17, 2013 at approximately 6:54 p.m., JOHNSON placed a recorded call from Division 9 in CCJ to telephone number (XXX) XXX-1593, used by LEWIS. During the call, JOHNSON asked LEWIS to put money into his account at CCJ. JOHNSON made statements that I interpret to mean that he was tired of asking LEWIS for money and that he wanted to be able to do something, meaning earn his own money inside of CCJ, for a change. Specifically, JOHNSON asked, "Did you send me that money already?" LEWIS said, "No." JOHNSON repeated, "No." LEWIS said, "No, I was going to do it on my way to work." JOHNSON said, "Oh, you were going to do it on your way to work." LEWIS said, "Yeah," and then

asked, "Why?" JOHNSON responded, "Nah, jus', jus', just send it to the books, uh, 'cause I told you, you know what we talked about?" LEWIS said, "Yeah." JOHNSON said, "Right. I'm trying to put something in motion now" LEWIS said, "Okay." JOHNSON said, "Just go on and send that. Then I'm going to call you and let you know what's going to be done. Alright?" LEWIS said, "Yeah." JOHNSON said, "Alright. So just be ready when I'm ready." LEWIS said, "I am. I got a little back up." JOHNSON said, "Hold on. Yeah." LEWIS said, "Yeah." JOHNSON said, "Like I say, 'cause, uh, I'm tired of this." LEWIS asked, "What?" JOHNSON said, "Begging you for money and then having you to keep putting money on the phone. I want to be able to do something for a change." LEWIS said, "Oh, okay. I get that." JOHNSON said, "Okay. As long as you understand me." LEWIS said, "Yes, I do."

33. Later in the same conversation, JOHNSON informed someone in the background, likely GOODS,⁷ that he had spoken to STEVENSON via a three-way call with LEWIS. JOHNSON then told LEWIS that they were going to need STEVENSON's assistance. Specifically, JOHNSON said to the person in the background, "I talked to Wang Wang [STEVENSON] on three-way. I called three-way. Yeah, I don't do messages. I do three-way." JOHNSON turned back to LEWIS and said, "Yeah. That number that I gave you, told you to hold." LEWIS said, "Mm hmm." JOHNSON said, "She's [STEVENSON] going to um, we are

⁷ I believe that JOHNSON spoke to GOODS in the background because JOHNSON told LEWIS earlier in the call that "Big Weasy" said thank you for calling his wife. Additionally, STEVENSON is GOODS's wife and JOHNSON and GOODS were housed in the same tier within CCJ and coordinating the smuggling of the contraband together.

gonna need her [assistance to smuggle contraband into CCJ]. You know?" LEWIS said, "Okay."

A. McCOLLUM and STEVENSON Retrieve Third Party Checks from CCJ Inmates' Trust Accounts and Cash Them at Currency Exchanges.

34. On June 17, 2013, McCOLLUM and POWELL had a number of recorded telephone calls. During these calls, McCOLLUM updated POWELL on what McCOLLUM and STEVENSON were doing. As set forth below, McCOLLUM and STEVENSON went to CCJ and accepted money from CCJ inmates' Trust Accounts via the third-party check system.

35. On Monday, June 17, 2013, at approximately 9:24 a.m., POWELL placed a recorded call from Division 9 on Tier 2H to (XXX) XXX-2544, used by McCOLLUM. I interpret the call, specifically described in paragraphs 36 through 40, as follows: During the call, McCOLLUM told POWELL that she and STEVENSON were in the vicinity of CCJ and about to be get out of their car. McCOLLUM also asked POWELL whether an inmate would authorize a distribution to McCOLLUM for \$300 from his Inmate Trust Account. POWELL could be heard coordinating the distribution with an unknown male in the background, who said that STEVENSON should pick-up the third party check from CCJ because the inmate knew STEVENSON's name. POWELL directed McCOLLUM to keep \$300 of the money that she and STEVENSON obtained from the third party accounts, while STEVENSON was to keep \$190.

36. Specifically, McCOLLUM told POWELL, "I ain't coming today, though." POWELL asked, "Why not?" McCOLLUM said, "Because Wang Wang [STEVENSON] wasn't ready." POWELL asked, "You say what now?" McCOLLUM said, "I'm just playing, but I was fitting to say, I'm, I'm down here, I [U/I] about to get out the car until you call." POWELL said, "Oh you are?" McCOLLUM asked, "What we supposed to do with this money [from a CCJ inmate's Trust Account]?" POWELL said, "Uh, you take three hundred [\$300] and Wang Wang [STEVENSON] takes one-ninety [\$190]." McCOLLUM said, "Okay, and if it fitting to be the whole three hundred [\$300] all together, is he going to say yeah?" POWELL said, "Huh." McCOLLUM said, "He going to say yeah [agree to take from his inmate Trust Account] to his whole three hundred [\$300]?"

37. After McCOLLUM asked the question, POWELL spoke to an unknown male in the background. POWELL said, "Is she getting the whole three hundred [\$300] on one person book [inmate Trust Account]?" An unknown male in the background said, "Yeah" and "Wang Wang." Other statements were inaudible. POWELL then said to McCOLLUM, "Uh, he says tell Wang Wang [STEVENSON] to get the money off [from the inmate's Trust Account], 'cause he [the inmate] know her, he know her [STEVENSON's] name." POWELL then told McCOLLUM to get "the one-forty [one third-party check for \$140] and the fifty [one third-party check for \$50]."

38. POWELL then told an individual in the background, "They [STEVENSON and McCOLLUM] downstairs, they in front [of CCJ, Division 9]."

McCOLLUM asked, "Okay, but what, who get the, I mean what do we get? Who [between STEVENSON and McCOLLUM] gets what money [how are the third party checks to be divided]?" POWELL said, "That's what I just told you, you [McCOLLUM] get the three hundred [\$300], and she [STEVENSON] get the one-ninety [\$190]."

39. During the telephone call, POWELL can be heard saying to GOODS in the background, "Wang Wang [STEVENSON] right there, you want to holler at her?" POWELL then said to McCOLLUM, "Put Wang Wang [STEVENSON] on the phone real quick man."

40. STEVENSON and GOODS then discussed how STEVENSON and McCOLLUM were supposed to split up the money that STEVENSON and McCOLLUM were about to receive from the inmates' Trust Accounts. GOODS instructed STEVENSON that McCOLLUM was to get \$300, while MAREK was to get \$200. Specifically, STEVENSON asked, "What are we supposed to do with it? Am I giving all of it [the money from the third-party checks] to Tasha [McCOLLUM] or what?" GOODS said, "No, you going to get, you going to get two [\$200] to uh, Murder [MAREK], and uh Tasha [McCOLLUM] got three [\$300]."

41. According to records received from the Department of Corrections, on June 17, 2013, McCOLLUM received two third party checks from the Department of Corrections. One check represented \$140.37 withdrawn from the Inmate Trust Account of Inmate B. The second third party check represented payment of \$59.89 withdrawn from the Inmate Trust Account of Inmate C. According to each of the

Authorization to Release Funds forms signed by McCOLLUM, she presented her driver's license at the time she received the third party checks. The forms were counter-signed by Inmate B and Inmate C.

42. On the same day, STEVENSON received a third party check, which was a \$300 withdrawal from the Inmate Trust Account of Inmate D. According to the Authorization to Release Funds form signed by STEVENSON, she presented her driver's license at the time she received the third party check. The form was counter-signed by Inmate D.

43. According to the Authorization to Release Funds forms signed by the aforementioned inmates, on July 17, 2013, Inmate B and Inmate C were assigned to CCJ, Division 9, Tier 2H. Inmate D was assigned to Division 9, Tier 2G.

44. On June 17, 2013, at approximately 3:22 p.m., POWELL placed a recorded call to (XXX) XXX-2544, used by McCOLLUM. During the call, McCOLLUM told POWELL that she and STEVENSON drove from CCJ to two Currency Exchange stores and cashed the three third-party checks that they received from CCJ.

45. Later in the conversation, McCOLLUM said that she had \$395 in cash at home. Specifically, she said, "But all together I got \$395 at home now. I had a hundred dollars, then I had the one [third party check], the one for one-fifty [\$150], one [third party check] for fifty-four dollars, and then Wang Wang [STEVENSON] gave me a hundred [\$100]. And plus the money we had at home, so it all come up to \$395 when I put it all together." POWELL said, "That's it? I thought it was more

than that. I thought it was supposed to be four [\$400]. [U/I] I thought it was supposed to be four ten [\$410]." McCOLLUM said, "No, they take out [U/I]. They don't give you the whole thing." McCOLLUM was interrupted by an automated Securus recording. McCOLLUM explained, "When you cashing checks, they [Currency Exchange] take out money [as a check-cashing fee]." McCOLLUM said, "But the one for that was one-fifty [\$150], they took out like six dollars, then they took out three dollars for the other one."

B. JOHNSON Directs LEWIS to Give Contraband to STEVENSON to Smuggle into CCJ; McCOLLUM and STEVENSON Purchase and Package Marijuana and Other Contraband for MAREK to Smuggle into CCJ.

46. On June 18, 2013, at approximately 5:28 p.m., JOHNSON placed a recorded call from Division 9 in CCJ to telephone number (XXX) XXX-1593, used by LEWIS. During the call, JOHNSON, speaking in coded language, directed LEWIS to bring two bags of "hot air balloons," in reference to contraband (based on the content of the call and the events that eventually transpired, I believe that these are likely either cigarettes, packages of loose tobacco, or baggies used to package marijuana or loose tobacco into user quantities), to STEVENSON. JOHNSON reassured LEWIS that STEVENSON knew what to do with the contraband, explaining that STEVENSON concealed it inside sandwiches.

47. Specifically, JOHNSON said, "So look, like, that number [STEVENSON's telephone number] I gave you yesterday to call, like." LEWIS said, "Uh huh." JOHNSON said, "Now listen. This is what we going to do. Um, those hot air balloons I was talking about." LEWIS said, "Uh huh." JOHNSON said,

“They come in bags. So, uh, I need two bags of those, and you going to drop them off to her [STEVENSON]. You see what I’m saying?” LEWIS said, “Uh huh.” JOHNSON said, “But, uh, she was going to do it, with, uh, a hundred dollars, but I’m going to make her come get the money off my books [from his Trust Account] for it.” LEWIS said, “Okay.” JOHNSON said “If I can’t find nobody to give me the hundred dollars. I should call Bigs, but his ass don’t answer his phone. ’Cause I got to do this by tomorrow morning. I’m going to need you to do it by tomorrow morning. I gotta find somebody who’s going to give me a hundred dollars real quick.” LEWIS said, “Okay. Where do I need to go? Indiana?” JOHNSON said, “Yeah, yeah, yeah. Right by the gas spot.” LEWIS said, “And okay. And I just, I don’t have to do nothing with it, just drop it off, right?” JOHNSON said, “Yep, yep. She, she [STEVENSON] knows everything else to do, ’cause, I think, uh” LEWIS said, “Okay.”

48. JOHNSON continued, “I think she [STEVENSON] going to get some sandwiches, some Jim Shoe sandwiches, and bring them to us, give us the Jim Shoe sandwiches.” LEWIS said, “Okay.” JOHNSON continued, “So, yeah, I told them I wanted rib [U/I], but I guess them sandwiches is the best, you know?” LEWIS said, “Yeah.” JOHNSON said, “But, um, yeah, so um, I’m fittin’ to uh, I’m going to be calling later on, because I know, I’m going to tell this officer to let me stay out so I can talk to you and I’m going to try to track a few dollars down so we can be able to pay for the food and stuff, you know?” LEWIS said, “Okay.”

49. On June 18, 2013 at approximately 9:58 p.m., GOODS placed a recorded telephone call from CCJ, Division 9, Tier 2H to telephone number (XXX) XXX-7452, used by STEVENSON. During the call, GOODS informed STEVENSON that JOHNSON's "wife,"⁸ LEWIS was going to bring her some "kites," which I understand to mean loose tobacco, and \$100 dollars. JOHNSON then got on the phone, and STEVENSON placed a three-way call to LEWIS. JOHNSON told LEWIS that their plan was moving ahead, "it's a green light on it[.]" and to call STEVENSON in the morning.

50. On June 18, 2013, at approximately 10:00 p.m., POWELL placed a recorded call to (XXX) XXX-2544, used by McCOLLUM. During the call, McCOLLUM and POWELL continued to talk about what I understand to be their plans to have marijuana smuggled into CCJ. Specifically, McCOLLUM said, "I talked to Neal [the marijuana dealer], he said, uhm, [U/I] said he got that, he waiting on him to finish the game and when he finish the game he'll, um, he gonna bring it [marijuana] and he'll have the other stuff for me tomorrow. But um...when dude [MAREK] coming [to pick up the contraband]? Tomorrow [June 19th] or Thursday [June 20th]?" POWELL said, "I think tomorrow [June 19th]."

51. As set forth below, the next day, June 19, 2013, McCOLLUM and STEVENSON purchased contraband and started preparing it to be smuggled into CCJ.

⁸ During the call, GOODS said "Sam's wife," but based on the content and context of the call, I understood him to be referring to LEWIS.

52. On Wednesday, June 19, 2013, at approximately 7:32 a.m. GOODS placed a recorded call from CCJ, Division 9, Tier 2H, to (XXX) XXX-7452, used by STEVENSON. I interpret the call to be STEVENSON telling GOODS that McCOLLUM explained to her how to conceal and package the contraband and that McCOLLUM will package the contraband so that it can be re-distributed before she conceals it for smuggling into CCJ. Specifically, STEVENSON said, "Okay, so I talked to Tasha [McCOLLUM], she said she got a lot of runnin' around to do so she told me how to do it. But I got enough money to get the food, your sandwich." GOODS said, "Okay, you got enough to get...." STEVENSON continued, "The liquor, the drinks and prolly some kites [loose tobacco] but she [McCOLLUM] sayin' I gotta buy seals [baggies] and all that stuff." GOODS said, "Alright, and uh and hey, nah. That's just how . . . she be doin' it. She basically tellin' you to bag [package] that shit [contraband] up."

53. Later in the same conversation, I understand STEVENSON to ask GOODS how he wants the marijuana and other contraband packaged because she has not received it yet. My understanding of the conversation is that GOODS tells her not to worry because he spoke to MAREK and MAREK was unavailable until Thursday.

54. Specifically, STEVENSON asked, "So what you want me to do? . . . 'Cause I don't know what I'm doing." GOODS answered, "...I'm not even, I ain't even tripping [worrying about] on that, uh, we gonna, we gonna let that, uh, we gonna get god damn it, we ain't gonna have to worry about that, I talked to Murda

[MAREK], uh, I ain't tripping [worrying about], damn. Uh, yeah, I talked to, uh, Murda [MAREK], I talked to Murda [MAREK], uh, last night, uh, he say uh, Thursday, uh, he say Thursday morning, basically, like, because, you know he tried, ya know, he tried to call earlier or whatever, but he told me on Thursday morning. So that's, uh, when you when you get that bread [money], have a mother fucker that, uh Wang [U/I], you ought to just hit [call] Murda [MAREK] and let him know you're waiting on him."

55. Next, GOODS and STEVENSON discussed how to package the contraband for entry into CCJ. I understand the discussion, which is specifically described in paragraph 56, as follows: STEVENSON explained that she had a conversation with McCOLLUM, during which McCOLLUM explained to STEVENSON how she (McCOLLUM) packages contraband for smuggling into CCJ. McCOLLUM told STEVENSON to buy a large sandwich with a lot of meat and small baggies for packaging the marijuana before concealing them within the sandwich. GOODS told STEVENSON that she didn't have to pre-package the marijuana into baggies for re-distribution, but that she could if she wanted to. GOODS went on to explain that some individuals who smuggle marijuana into CCJ know how to compress the drug in such a form that it can be easily concealed. GOODS said that it didn't matter how STEVENSON packaged the marijuana because it would be wrapped up.

56. Specifically, GOODS asked, "What time Tasha [McCOLLUM] say she coming over there?" STEVENSON said, "She not comin' 'cause she said she got a

lot of stuff to do, but she just told me how to wrap it [marijuana] up.” GOODS said, “Okay, okay, alright.” STEVENSON explained, “She [McCOLLUM] told me how to do it [conceal the marijuana] and how to put it like, get a sandwich that got a lot of meat. But I told her what kind of sandwich you wanted, and she’s like, okay, well. She was telling me how to do it, but she was talking about you gotta’ get these kind of seals and all that. I’m like, I don’t know, like that’s what I be telling you.” GOODS responded, “Uh, ah, uh, nah. You don’t, look, Wang Wang [STEVENSON], man, man, hold on, look, you don’t have to, you ain’t gotta get, you know what I’m saying, you know, um, shit, you can if you want to, but you don’t have to. The whole thing is here, mother fuckers know, how, you know what I’m saying, the shape of it, you know what I’m saying? Mother fuckers know how to compress it, you know what I’m saying, that shit down, fold it up. You see what I’m saying [U/I]? But that mother fucker like, let me see, like, how that sandwich look....” STEVENSON said, “She [McCOLLUM] said like, when I do it [conceal the marijuana], because I guess how she do it, she has it where it be like a little pencil. Or something, she was saying.” GOODS asked, “You talking about like how she [McCOLLUM] roll it up [marijuana], right? How she wrapped it down?” STEVENSON confirmed, “Yeah.” GOODS said, “Right, yeah. Fold it [marijuana] down, compress it real small. You know what I’m saying? It’s gonna be basically, like, you know what I’m saying?” STEVENSON said, “ ’Cause you want me to leave it up to [U/I]....” GOODS said, “I mean...it’s all about how you want to do it. It really don’t matter cause at the end of the day it’s [marijuana] gonna be wrapped up and put up.”

57. Later in the same conversation, described specifically in paragraph 58, I understand GOODS and STEVENSON to discuss the following: GOODS and STEVENSON discuss how much of the bribe money McCOLLUM would supply and what additional contraband McCOLLUM was going to give to STEVENSON. McCOLLUM was going to give STEVENSON \$100 and additional contraband. GOODS told STEVENSON that he would prefer STEVENSON to package the marijuana into baggies. GOODS referred to a “nick” or a “nickel,” which I understand to be terminology of price representing five dollars. I understand a nickel seal to be a small baggie, which can be sold for five dollars when filled with marijuana. GOODS explained that he could sell \$5 baggies of marijuana for \$50 each within CCJ. After initially saying that it did not matter whether the marijuana was packaged into user quantities, GOODS later said that he wanted the marijuana, which was going to be smuggled into CCJ, pre-packaged into small baggies so that it could more easily be redistributed to other inmates when GOODS received it. GOODS explained that if the marijuana is not pre-packaged for redistribution, then he would have to re-package it out of sight from Department of Corrections staff.

58. Specifically, GOODS said, “....I’mma fitting to go get dude [U/I], holla at him right now. Let him know, you know, what I’m sayin’...he doing just this one real quick.... Tasha [McCOLLUM] gonna give you a 100 [\$100]. Tasha [McCOLLUM] gonna give you a 100 [\$100] with all that other shit [contraband], god damn it. [U/I] Dude...” STEVENSON asked, “Do you want me to put it in the bag

or you just want me to wrap it up?" GOODS said, "I mean shit. I would preferred it, shit, you know what I'm sayin, the seals. You prolly got it, matter of fact. I tell you what, the uh, fuck the uh, the uh kite [loose tobacco], fuck the kite [loose tobacco]." STEVENSON asked, "You sure?" GOODS said, "Don't even worry 'bout that. 'Cause today, girl gonna get two big bags anyway, uh, well just grab the seals [baggies], you know what I'm sayin', and uh just uhm, put 'em in da seal, 'cause see uh, the reason it be good, why they, the reason I be liking them in the seals [baggies], 'cause you know a nickel [\$5], you know like the nick seals [\$5 baggies of marijuana]?" STEVENSON said, "Mm hmm. . . She said 25 by 25." GOODS responded, "Okay, right. But that, right that might, that got to be the [UI] seals [baggies]. But the nick seals [\$5 baggies of marijuana] when they come through I pop them out \$50 a pop. When they [UI] come through, you know what I'm saying?" STEVENSON asked, "So what, what number is that?" GOODS said, "The nicks [\$5 baggies]." STEVENSON asked, "Which ones you want me to get?" GOODS said, "Look, uh, Tasha [McCOLLUM] knows the ones [baggies] to get for the nicks and the [UI]. The nicks [\$5 baggies of marijuana], I be poppin' [selling] out \$50 a pop. The [UI] I be poppin' 'em off like a 100 [\$100]. So it's dat dat dat the only good thing about you know what I'm sayin' them being in the seals [baggies], you know, cause if they ain't in the seals [baggies], then I got to really, you know what I'm saying, bag up out of sight." STEVENSON asked. "So how many bags do I supposed to get?" GOODS responded, "It ain't how many you supposed to get. Them bitches come in a pack. You going to have a whole bag of them mother-fuckers [baggies]."

59. At approximately 7:54 p.m. that evening, JOHNSON placed a recorded call from Division 9 in CCJ to telephone number (XXX) XXX-1593, used by LEWIS. During the call, JOHNSON confirmed that he had spoken to GOODS. JOHNSON said, "He [GOODS] let her know [U/I] she I guess he say all good. She, you got, she ain't do the bags, she did the tin [loose tobacco]. I say, 'I know, 'cause it don't come in the bag, but it's the same.' He like, 'Okay, okay.' So I'm like. . . 'how many sandwiches is she [STEVENSON] buying?' 'Well, I don't know I got to see if she got enough of them.' 'Oh, she got more than enough, 'cause you dealing with all these other niggers so you got a lot of money. You just got you like a thousand bucks in.' " LEWIS asked, "Oh, for real?" JOHNSON said, "Yep. So I'm like, 'Nigger, just so long as I got my sandwich, you know I don't care.' " LEWIS said, "Uh huh."

60. The next day, on June 20, 2013, at approximately 11:12 a.m., GOODS placed a recorded call from CCJ, Division 9, Tier 2H to telephone number (XXX) XXX-7452. As I interpret the call, STEVENSON told GOODS that she was picking up sandwiches and plastic wrap, which she planned to use to package and conceal marijuana for smuggling into CCJ. STEVENSON said, "On my way to the store." GOODS said, "On the way to the store, what you fitting go do?" STEVENSON responded, "Get drink and some Saran Wrap." GOODS said, "Ah, you ain't get that yesterday?" STEVENSON said, "Huh? No I ain't go yesterday." GOODS asked, "What's up with the food?" STEVENSON said, "I called Tasha [McCOLLUM] to get the sandwich and I'm going to pay her when she get here. But she [McCOLLUM]

said tell Ju Ju [POWELL] to call her 'cause whoever [the marijuana supplier] supposed to come still hasn't come [to deliver the marijuana to McCOLLUM].

61. On June 20, 2013, at approximately 11:16 a.m., GOODS placed a recorded call from CCJ, Division 9, Tier 2H to (773) XXX-7452, used by STEVENSON. During the call, GOODS and STEVENSON spoke briefly. Then POWELL took GOODS's end of the telephone. Based on the context of the above call, I believe that GOODS placed a call to STEVENSON and then handed the receiver to POWELL. I believe STEVENSON placed a third-party call to McCOLLUM so that POWELL and McCOLLUM could speak through STEVENSON's phone.

62. Specifically, STEVENSON said, "Hold on." Next, McCOLLUM said, "Hello." POWELL said, "Yeah, hey why there ain't no money on the phone?" McCOLLUM says, "There is." POWELL says, "I just called, there ain't nothing on there" [POWELL told McCOLLUM that he could not make calls directly to her because there was no money on the Securus account]. During the call, specifically described in the next paragraph, I understand McCOLLUM and POWELL to discuss that McCOLLUM was to get "three," meaning three ounces of marijuana, from the drug supplier for \$200. McCOLLUM told POWELL that she spoke with the supplier and that he only had "two," meaning two ounces of marijuana, available. Accordingly, McCOLLUM asked for a return of part of the money she previously paid the individual.

63. Specifically, POWELL asked, “Well, what’s, what’s goin’ on?” McCOLLUM responded, “Nothin’, I’m just now I’m finna meet him [the marijuana supplier], but he says he only has two [ounces] and uh, um, two [ounces] and the other one, so I just told him to give me the fifty dollars back because by the time Fred come wit’ the other one [ounce], I’m been have to meet Wang Wang [STEVENSON] already. POWELL said, “Hmm. You told him give you fifty [\$50] back?” McCOLLUM said, “Yeah, ’cause it, it was [supposed to be] three [ounces]. One, it would of been three [ounces] altogether ’cause dats one fifty [\$150] and one fifty [\$50 bill]. So that mean I gave him two [\$200]. He supposed to give me fifty [\$50] back. POWELL said, “A’ight.” McCOLLUM said, “Right, and like I told you, the only thing I couldn’t find was the kite [loose tobacco], but I got everything else. I got two packs of uh, um, squares [cigarettes], the um Swishers [Swisher Sweet cigars], and um.” POWELL said, “Huh?” McCOLLUM said, “I couldn’t find no kite [loose tobacco]. I’m finna go to the store right here at the shop I’m goin’ to, to see if they got some.” POWELL said, “A’ight, uh. So he said he couldn’t get the other one [ounce]?” McCOLLUM said, “He said that he still waitin’ on it. . . .Yeah, he said he [marijuana dealer] only gave him two [ounces] and he just met him [U/I].”

C. MAREK Brings Marijuana and Contraband into CCJ.

64. On June 20, 2013, at approximately 12:10 p.m., law enforcement established surveillance in the vicinity of STEVENSON’s residence on West 70th Street in Chicago. At approximately 1:46 p.m., surveillance observed two females matching the description of McCOLLUM and STEVENSON exit the apartment

building located at the address on STEVENSON's registered driver's license in Chicago, Illinois. Surveillance saw McCOLLUM holding a white shopping bag. McCOLLUM then entered a car registered to an individual at her address on Harper Avenue in Chicago.

65. The following day, on June 21, 2013, at approximately 12:40 p.m., law enforcement established surveillance in the vicinity of STEVENSON's residence on West 70th Street in Chicago. Surveillance observed the following:

a. At approximately 1:29 p.m., a black Dodge Ram pickup truck, driven by a male, later identified as MAREK, parked in front of STEVENSON's apartment building.

b. MAREK stepped out of the truck wearing a Cook County Department of Corrections correctional officer uniform. STEVENSON walked through the front gate of her residence and towards MAREK's truck carrying a white plastic bag. MAREK walked around the front of the truck and met with STEVENSON near the passenger door of MAREK's pickup truck.

c. MAREK was wearing a pistol holstered on his hip. MAREK and STEVENSON had a conversation.

d. MAREK then returned to his truck and entered the driver's seat where he appeared to be waiting.

e. At approximately 1:38 p.m., the same car that surveillance observed McCOLLUM drive the day before pulled up behind MAREK's truck.⁹ STEVENSON walked up to the car. The driver passed an item to STEVENSON. STEVENSON then walked to the driver's side of MAREK's truck. STEVENSON handed MAREK an object through the driver's side window of the pickup truck. MAREK then drove away.

66. Surveillance followed MAREK to CCJ. At approximately 3:13 p.m., MAREK drove into the employee parking lot for CCJ, Division 9. MAREK parked his truck, got out, and walked to the entrance of Division 9 while carrying a white plastic bag in his hand.

67. At approximately 3:15 p.m. MAREK carried the white plastic bag past the inner security gate of Division 9. At approximately 3:17 p.m., law enforcement stopped MAREK and took custody of the white plastic bag.

68. Inside the white plastic bag, law enforcement found two sandwiches. Concealed within the first sandwich were two bundles of greenish leafy substance with an odor consistent with the smell of marijuana, each wrapped in plastic food wrap, and weighing 29.0 grams and 28.9 grams, respectively. The total weight of marijuana as delivered in the first sandwich was approximately 57.9 grams. The second sandwich was in a brown paper bag. Also inside the brown paper bag was a box of Newport 100s cigarettes, mentholated cigarette tobacco, and 32 cigarette papers. Concealed within the second sandwich were a ring, a bundle of greenish

⁹ Surveillance observed McCOLLUM driving the same car the previous day but was unable to see who the driver of the vehicle was on June 21, 2013.

leafy substance with an odor consistent with the smell of marijuana that weighed approximately 21.2 grams, and two bundles of tobacco. All of the items hidden within the second sandwich were wrapped in plastic food wrap.

69. Law enforcement later conducted a search of MAREK's truck, recovering \$200 from the center console and a Sig Sauer pistol with fifteen rounds of ammunition. On the floorboard of MAREK's truck were two white plastic bags. Within one bag was a sandwich, a box of cigarettes, two Swisher Sweets and a bag of plastic baggies. The individual baggies were approximately one inch by one inch in size. Based on my training and experience and the training and experience of other law enforcement, I know that these baggies are commonly used to package user-quantities of narcotics, including marijuana.

70. The sandwich recovered from MAREK's truck also had marijuana concealed within it. Specifically, hidden inside the sandwich was a bundle of 18 individual ziplock packets. The individual ziplock packets were bundled together with plastic food wrap. Each of the 18 individual ziplock packets contained a greenish leafy substance with an odor consistent with the smell of marijuana. The bundle had a total weight of approximately 25.6 grams. Two additional ziplock packages were concealed within the sandwich, but not wrapped in food wrap. In addition to the pre-packaged quantities of marijuana, the sandwich also contained a bundle of a greenish leafy substance with an odor consistent with the smell of marijuana wrapped in food wrap. That bundle of marijuana weighed approximately 7.1 grams.

71. A plastic bag on the floorboard of MAREK's truck also contained aluminum soft drink cans and a bottle labeled Glaceau Smart Water. The liquid within the water bottle had an odor consistent with alcohol.

72. Because the aforementioned items of contraband were seized by law enforcement, none of the contraband was received by GOODS, POWELL, or JOHNSON for further distribution within the jail.

D. McCOLLUM Confirms to POWELL that She Gave Money and Contraband to MAREK.

73. On June 21, 2013, at approximately 4:26 p.m., POWELL placed a recorded call from CCJ, Division 9, Tier 2H to (XXX) XXX-2544, used by McCOLLUM. During the call, McCOLLUM told POWELL that she gave \$50 to MAREK earlier in the afternoon at approximately 1:30 p.m. She also confirmed that MAREK received the food and contraband. Specifically, McCOLLUM said, "[D]ude [MAREK] came and got your stuff [contraband] and I gave him the fifty dollars today." POWELL confirmed, "He came and got it today?" McCOLLUM said, "Yes, I just, we [McCOLLUM and STEVENSON], I just met him at 1:30." McCOLLUM also said, "I gave him fifty dollars." During the call, POWELL asked, "So he got the food and stuff [contraband]?" McCOLLUM said, "Yeah, he has everything."

V. ATTEMPTED EXTORTION OF MAREK

74. As discussed below, GOODS, POWELL, and JOHNSON worked with McCOLLUM and LEWIS to learn personal information about MAREK in order to threaten and intimidate MAREK into smuggling contraband into CCJ. JOHNSON

informed LEWIS, a supervisor in the Police Dispatch workgroup of OEMC, about MAREK having failed to bring contraband into CCJ and that he, JOHNSON, needed information about MAREK's home address in order to send individuals there. LEWIS then ran MAREK's license plate number through the Illinois State Police Law Enforcement Agencies Database and then provided information about MAREK's residence and family to JOHNSON.

A. JOHNSON Informs LEWIS that MAREK Did Not Give Them the Contraband and Requests LEWIS's Assistance.

75. On June 22, 2013, at approximately 4:24 p.m., JOHNSON placed a recorded call from CCJ, Division 9, Tier 2H to telephone number (XXX) XXX-1593, used by LEWIS. During the call, JOHNSON told LEWIS about a conversation that he heard MAREK having with GOODS about MAREK throwing away the contraband and GOODS's reaction.

76. Specifically, JOHNSON told LEWIS, "So here's the dilemma. Buddy [MAREK] came in, right?" LEWIS responded, "Uh-huh." JOHNSON then said, "He [GOODS] came up here, the guy [MAREK] who he [GOODS] was dealing with, gave him some script about all this, all that. Like he [GOODS] tell us his [MAREK's] car got hit. Then he [GOODS] tell us he [MAREK] left, since he [MAREK] didn't work over here yesterday, he [MAREK] left the stuff [contraband] in his [MAREK's] locker. Today, he [MAREK] went in his locker see the cockroach on the bag, so he [MAREK] threw everything away. But..." LEWIS said, "What!" JOHNSON said, "Hold on. Let me. But, this the thing. He [MAREK], he tries to tell him [GOODS], he [MAREK] didn't know it was nothing with the food. You know what I'm saying?"

So he [GOODS] say, 'What you thought, we was just, I was just paying you all that money just [U/I]?' So he [GOODS] like, 'Man, don't play with me, go get my shit [contraband], go get my shit.' Right?" LEWIS responded, "Uh-huh." JOHNSON said, "So him, him, him [GOODS] and the other guy [MAREK], they back and forth 'cause they talking in the hall. I'm playing cards. So he [GOODS] comes and calls everybody that he deals with up at the stairs and give us the story that dude [MAREK] just gave him. You feel me?" LEWIS said, "Uh-huh." JOHNSON continued, "Well, you know, everybody looking stupid. I'm just standing there looking calm. So everybody like, 'Damn, what you got up your sleeve?' So I'm like, you know, 'I'm not tripping [worrying]. I don't care who it [contraband] come from. As long as whoever can fit the bill [provide the contraband], I'm straight.' You see what I'm saying?" LEWIS said, "Uh-huh."

77. As the call continued, and as specifically described in the next paragraph, LEWIS explained that she did not believe MAREK's excuses for throwing the contraband away. JOHNSON said that GOODS had a reputation for providing information to law enforcement and that someone must have warned MAREK about GOODS. As JOHNSON explained to LEWIS, MAREK had to continue his relationship with GOODS despite his concerns because he already took a bribe.

78. Specifically, after JOHNSON explained the situation between MAREK and GOODS, LEWIS said, "Well, that's crazy. That story sounds like some straight bullshit." In response, JOHNSON said, "It is, it is, it is, but, you know, the one

[GOODS] who he [MAREK] dealing with got a reputation of setting people up around here and being the police, you know, I was telling you about him.” JOHNSON continued, “So when this mother fucker [MAREK] started dealing with him [GOODS], he [MAREK] didn’t know all this [U/I], so I guess somebody went and got in his [MAREK’s] ear about this person [GOODS], so now he [MAREK] coming with all these excuses why he don’t want to deal with him [GOODS]. But the thing is, you’d had laid in the bed [agreed to take the bribe in exchange for smuggling contraband into CCJ]. Now you got to lay in here and continue the relationship. Not only that, you took your pay [accepted the bribe payment]. You see what I’m saying?”

79. In response to JOHNSON’s statements, LEWIS said, “Uh-huh.” JOHNSON then said, “So like I told him [GOODS], I don’t care who it come from. Somebody got to foot the bill, or it is going to be some real fucked up situations around here.” I understood JOHNSON to mean that he told GOODS someone needed to reimburse JOHNSON for the money JOHNSON invested to have contraband smuggled into the jail or provide the contraband or there would be consequences, including possible violence. In response, LEWIS said, “Hell yeah. That’s money wasted.”

80. During the same conversation, JOHNSON explained that he could use LEWIS’s position in his effort to get repaid by GOODS or MAREK. Specifically, he said, “See, that’s the thing. He playing. He don’t know the ace the hole [LEWIS] that I got. You know what I’m saying?” LEWIS said, “Uh-huh. Yeah. Wow.” As they

continued to talk about JOHNSON's efforts to recover the money he paid to have contraband smuggled into CCJ, JOHNSON explained how he needed LEWIS's help. Specifically, he said, "... I want something done. I want, I want, to see, man. See this is the time. I used to tell you get your little connections in order, get your little juice up, up in there. This is the time when I would have needed you. You know what I'm saying?" LEWIS asked, "To get my who?" JOHNSON explained, "Your juice up, your, your connections, get your co-workers and shit like that." LEWIS responded, "Oh my god. Like, what? There ain't nobody." JOHNSON said, "So I could had did some shake-downs [used a connection of LEWIS's to extort payment from GOODS or MAREK]." LEWIS said, "Oh. Well, I only had one person that I knew that, you know, and you know that person. And I don't talk to them no-more."

81. Later that evening, at approximately 9:59 p.m., JOHNSON placed a recorded call from CCJ, Division 9, Tier 2H to (XXX) XXX-1593, used by LEWIS. During the call, I understand JOHNSON to tell LEWIS that they were going to convince MAREK to smuggle contraband into CCJ by sending associates to MAREK's house. Later in the conversation, JOHNSON told LEWIS that he was going to send her a license plate and that she already knew what to do, meaning to run that license plate number. Specifically, JOHNSON said, "What I, what I talked to you about earlier, we good baby, just hold off. Uh, I might have something coming your way, you know what I'm saying?" LEWIS said, "Okay." JOHNSON said, "Yeah, because, uh, I guess he's [GOODS] going to get his [MAREK's] mind right again, he got to uh, take his ass out [U/I] shit." LEWIS said, "Okay."

JOHNSON said, “So we going to have a [U/I] team pull up at that bitch [MAREK’s] front door.” Later in the conversation, JOHNSON said, “I’m uh, give me a couple days, and I’m gonna shoot you this license plate number and you already know what to do when I give it to you.” LEWIS said, “Okay.”

B. POWELL Informs McCOLLUM that They Did Not Receive the Contraband; McCOLLUM and STEVENSON Visit POWELL and GOODS at the CCJ.

82. As discussed below, in a series of calls recorded by CCJ’s Securus system, POWELL informed McCOLLUM that they did not receive the contraband that McCOLLUM and STEVENSON gave to MAREK to smuggle into CCJ. POWELL then directed McCOLLUM to visit him in CCJ and to bring STEVENSON. Following the visit by McCOLLUM and STEVENSON to CCJ on June 24, 2013,¹⁰ JOHNSON and LEWIS placed a three-way call to McCOLLUM during which JOHNSON told McCOLLUM to text the information, referring to MAREK’s license plate, to LEWIS. JOHNSON then told LEWIS to provide him with all of the information connected with MAREK’s license plate. While speaking to JOHNSON over the phone, LEWIS, who was working at the OEMC, accessed the Illinois State Police Law Enforcement Agencies Database and ran MAREK’s license plate number, providing the information to JOHNSON.

83. Specifically, on June 23, 2013 at approximately 9:08 a.m., POWELL placed a recorded telephone call to (XXX) XXX-2544, used by McCOLLUM. During the call, McCOLLUM asked POWELL if he had received the contraband.

¹⁰ Visitor logs for Division 9, Tier 2-H at CCJ do not reflect any visitors for that tier on June 24, 2013.

Specifically, McCOLLUM said, “You got yo’ stuff [contraband]?” POWELL laughed at McCOLLUM’s question and then asked her to come visit him at CCJ. Later in the conversation, POWELL told McCOLLUM that when she comes to CCJ to visit she needed to bring STEVENSON. When McCOLLUM told POWELL that she couldn’t visit because she couldn’t afford to miss any more days at work, POWELL said, “This some big shit.” McCOLLUM then agreed to visit POWELL the next day. She again asked, “Did you get your stuff [contraband]?” POWELL said, “I told you that’s what I need to talk to you about when you come up here.” McCOLLUM asked, “What?” POWELL responded, “Babe! Long story, man.” McCOLLUM then asked, “So what, I’m gonna call Weasy [GOODS] out [for visitation] and she [STEVENSON] gonna call you [POWELL] out [for visitation]?”

84. Based on my training and experience and participation in this investigation, I know that by requesting to visit the respective inmates, McCOLLUM, STEVENSON, POWELL, and GOODS could all meet in person at the same time and that their in-person conversations in the visiting room would not be recorded.

85. During the same conversation, POWELL told McCOLLUM that he needed to get additional contraband smuggled into CCJ so that he could recover the money that he lost when MAREK purportedly threw away the contraband. Specifically, McCOLLUM asked POWELL, “What’s wrong?” POWELL said, “Shit man, I mean, I need some shit done, man, so I can get my money back from this

shit.” POWELL told McCOLLUM, “I’m just finna, I’m finna have to bust this little move, so I can get my money back that I just spent, damn, fuck, shit.”

86. POWELL and McCOLLUM then discussed what she and STEVENSON gave to MAREK on June 21, 2013 to smuggle to GOODS and POWELL. McCOLLUM also informed POWELL that she had spent “twenty-two dollars” for cigarettes. It is my understanding that POWELL and GOODS were attempting to reestablish the contraband that was attempted to be smuggled into CCJ on June 21, 2013, and have MAREK bring the replacement supply into CCJ.

87. Based on the aforementioned recorded jail call, McCOLLUM visited CCJ the next day, on June 24, 2013. On that date, the parking lot for correctional officers assigned to Division 9 was adjacent to the Division 9 visitor’s entrance. The license plates of employee vehicles could be seen from the visitor’s entrance and from the sidewalk along 31st Street. As discussed above, MAREK was sitting in his pickup truck outside of STEVENSON’s residence when McCOLLUM arrived and gave STEVENSON an additional \$50 to give to MAREK. As discussed below, I believe that McCOLLUM located MAREK’s vehicle and license plate, which she provided to LEWIS via text message.

88. On June 24, 2013, at approximately 5:37 p.m., JOHNSON placed a recorded call from CCJ, Division 9, Tier 2H to (XXX) XXX-1593, used by LEWIS. During the call, JOHNSON asked LEWIS to make a three-way call to STEVENSON. When that call was not completed because STEVENSON’s line was busy, JOHNSON then asked LEWIS to call McCOLLUM. When McCOLLUM

answered, JOHNSON said, “Yeah, my name Primo [JOHNSON], I’m callin’ here for Ju Ju [POWELL]. Look, we need you to do something important. You know that information [MAREK’s license plate number] you just got for him [POWELL]?” McCOLLUM responded, “Yes.” JOHNSON said, “Text it [the license plate number] to my wife [LEWIS] right now ASAP and then she [LEWIS] gonna uh, text you back everything dat needed to be known on there. Okay?” McCOLLUM confirmed, “Alright.”

89. After terminating the three-way call with McCOLLUM, JOHNSON and LEWIS continued their conversation. During the call, JOHNSON directed LEWIS to give him everything that she found regarding MAREK. Specifically, JOHNSON said, “Hey baby...Everything that pop up [regarding MAREK], we need it. Everything.” LEWIS responded, “Okay.” JOHNSON said, “Alright. And we need that ASAP so as soon as that come through, if it’s, if you, if you on the phone with me when it come through, we need it. [U/I] You know what I’m sayin’?” LEWIS asked, “You want me to tell it to you or what?” JOHNSON said, “Yeah, you- I mean, you gonna have to tell it to me you – you know we could just- just tell it to me, I don’t care.” LEWIS asked, “So you don’t need me to text her [McCOLLUM] back [with the information from the license plate]?” JOHNSON responded, “Nah, you don’t gotta text her back. You just give it to me ’cause, uh, I fitting to write it down.”

90. As the conversation continued, JOHNSON complained, “Damn, how long does it take for a text to come through?” LEWIS responded, “I ain’t get it [the

text message containing MAREK's license plate information]. Hold on. Ah, I did get it." LEWIS then repeated, "I got it. Hold on."

91. After a pause in their conversation, LEWIS said, "Hello?" JOHNSON said, "Yeah, it sound like you being sneaky." LEWIS responded, "Shut up! I can't talk to you on the phone in front of [a particular individual]. You know she's my friend, but she's my boss. Hold on. . . ."

92. LEWIS is then heard talking in background to an unknown individual. LEWIS stated, "[U/I] Can I go see something on your computer real quick?" An unknown female, responded, "[U/I] my phone?" LEWIS clarified, "No, your CAD.¹¹ I need to use your CAD. I don't want to walk all the way over to the thing."

93. Turning back to JOHNSON, LEWIS said, "Hold on." JOHNSON responded, "Okay." After a pause in their conversation, LEWIS said, "Hello?" JOHNSON said, "Yeah." LEWIS asked, "Okay, is it uh Jason or [MAREK's father's first name]?" JOHNSON said, "Hold on, hold on. Hold on, you say Jason or [MAREK's father's first name]?"¹² LEWIS said, "Uh huh." JOHNSON then asked, "Uh, what's the last name?" LEWIS said, "M-a-r-e-k." JOHNSON said, "Yep." LEWIS asked, "That's it?" JOHNSON confirmed, "Yep." LEWIS said, "Ok, it's [street number, street name]."¹³ JOHNSON asked, "West [street name]?"¹⁴ LEWIS

¹¹ OEMC employees search records via Computer Aided Dispatch terminals. According to a Chicago Police Department general order, the terminals are referred to by the acronym CAD.

¹² According to the vehicle registration, MAREK and his father were joint owners of MAREK's vehicle, as such an inquiry on the vehicle would provide both names.

¹³ LEWIS provided the registered address of MAREK's truck. LEWIS told JOHNSON the street number, street name, and city.

repeated MAREK's street name and city. JOHNSON then asked, "Uh, nothing else? Like, a wife name, a phone number, or nothing?" LEWIS said, "No, that's the only thing we get is the vehicle." JOHNSON repeated, "Uh, that's the only you get is the vehicle?" LEWIS said, "Yeah." JOHNSON said, "Okay." LEWIS confirmed, "That's it." JOHNSON said, "Okay, thank you, baby." LEWIS said, "Yeah." JOHNSON then said, "Hey." LEWIS asked, "What?" JOHNSON asked, "Is that, uh, did you know if that, uh, that, uh, address was a house or apartment?" LEWIS said, "Uh, it doesn't say that it's an apartment so the assumption is that it is a house." Talking to an unknown person in the background, JOHNSON said, "It doesn't say apartment, so it gotta be a house 'cause it doesn't say apartment." Turning back to LEWIS, JOHNSON said, "Alright, love you baby, that's, that's, that's it." LEWIS said, "Okay." LEWIS then warned, "I better not hear nothing back from this" JOHNSON reassured her, "Aww, no you not. But uh, don't worry about this. This ain't got nothing to do wit' us and, uh, like I say, just, I'm just tryin' to get my money back. You the one doing legal shit around here."

94. According to records obtained from OEMC, an inquiry of MAREK's license plate was made from an OEMC computer to the Illinois State Police Law Enforcement Agencies Database on June 24, 2013 at 5:52 p.m. The inquiry was made at the same time as the aforementioned conversation between LEWIS and JOHNSON.

¹⁴ JOHNSON attempted to confirm the address but repeated an incorrect street name.

95. According to Illinois State Police Records, when MAREK's license plate was submitted to LEADS from the OEMC computer, LEADS queried the vehicle's VIN and MAREK in the National Crime Information Center database, which is operated by the FBI in Clarksburg, West Virginia. According to NCIC records, a query of MAREK's name, VIN, and driver's license number was conducted on June 24, 2013 at approximately 5:52 p.m.

96. The foregoing evidence establishes that JASON MAREK, THADIEUS GOODS, LAVANGELIS POWELL, PRINCE JOHNSON, PEARLISA STEVENSON, and NATASHA McCOLLUM conspired with each other and with others known and unknown to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, namely, marijuana, in violation of 21 U.S.C. § 841(a)(1), in violation of 21 U.S.C. § 846.

97. The foregoing evidence also establishes that STEPHANIE LEWIS accessed a computer without authorization and exceeded authorized access to obtain information in furtherance of a criminal act in violation of the Constitution or law of the United States, namely, violations of 18 U.S.C. § 1951 and 21 U.S.C. § 846, in violation of 18 U.S.C. § 1030(a)(2)(B).

98. The foregoing evidence also establishes that LAVANGELIS POWELL, PRINCE JOHNSON, NATASHA McCOLLUM, and STEPHANIE LEWIS conspired with each other to access a computer without authorization and to exceed authorized access to obtain information in furtherance of a criminal act in violation of the Constitution or law of the United States, namely, violations of 18 U.S.C. § 1951 and 21 U.S.C. § 846, in violation of 18 U.S.C. § 1030(b).

FURTHER AFFIANT SAYETH NOT.

BRYAN BUTLER
Special Agent,
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on October 20, 2014.

JEFFREY T. GILBERT
United States Magistrate Judge