
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAMES WILSON

CASE NUMBER:

UNDER SEAL**CRIMINAL COMPLAINT**

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

On or about April 8, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

*Code Section*Title 21, United
States Code, Section
841(a)(1)*Offense Description*

defendant JAMES WILSON did knowingly and intentionally distribute a controlled substance, namely, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance.

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.

DONALD C. WOOD
Special Agent, Drug Enforcement
Administration

Sworn to before me and signed in my presence.

Date: July 15, 2015

*Judge's signature*City and state: Chicago, IllinoisMichael T. Mason, U.S. Magistrate Judge*Printed name and Title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SS

I, Donald C. Wood, being duly sworn, states as follows:

I. INTRODUCTION

1. I am a Special Agent with the United States Drug Enforcement Administration (“DEA”). I have served as a Special Agent for the DEA since December 1997. As a DEA Special Agent, I investigate criminal violations of the Federal and State controlled substance laws including, but not limited to possession with intent to distribute and distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. I have been personally involved in a significant number of narcotics investigations, and as such, I am familiar with the various methods used by narcotics traffickers to transport, store, and distribute narcotics and narcotics proceeds. I have participated in investigations involving various drug types, including heroin, cocaine, and cocaine base in the form of crack cocaine. I have experience with a wide range of investigative techniques, including various types of visual and electronic surveillance, the interception of wire communications; the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances; facilitating controlled deliveries of narcotics; the execution of search and arrest warrants; and the management and use of informants.

3. Because this Affidavit is for the limited purpose of establishing probable cause to support the Criminal Complaint and the issuance of arrest warrant against JAMES WILSON, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and events described in this Affidavit. This Affidavit is made in support of a complaint that charges that on or about April 8, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, WILSON did knowingly and intentionally distribute a controlled substance, namely, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The statements contained in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided by other federal law enforcement officers and Chicago Police Department (“CPD”) officers; (c) review of conversations intercepted pursuant to court orders authorizing the interception of wire and electronic communications; (d) laboratory analysis reports; (e) surveillance reports; (f) criminal history records; (g) information from confidential informants; and (h) my training and experience and the training and experience of other law enforcement agents.

II. PROBABLE CAUSE

A. Summary

5. An individual cooperating with law enforcement (“CS-4”) provided information to agents that ultimately led to CS-4’s purchase of crack cocaine from

WILSON. More specifically, on or about April 8, 2015, CS-4 purchased approximately 125 grams of crack cocaine from WILSON in exchange for \$4,500.

B. The Confidential Source

6. CS-4 began cooperating in the instant investigation in or around October 2014. CS-4 was not facing any criminal charges, but was instead cooperating with law enforcement in exchange for payment. As of April 2015, CS-4 had been paid \$2,380. In connection with the instant investigation, CS-4 provided information that an individual located on the West side of Chicago was involved in distributing crack cocaine ("Individual A"). In order to verify this information, at the direction of law enforcement, from in or about March 26, 2015, through on or about April 5, 2015, CS-4 made multiple consensually recorded telephone calls to Individual A and an associate of Individual A to arrange to purchase crack cocaine from Individual A. As detailed below, on or about April 7 and 8, 2015, CS-4 made consensually recorded telephone calls to an individual, later identified as WILSON, in order to arrange the purchase of crack cocaine, which purchase occurred on or about April 8, 2015.

7. However, when making the consensually recorded calls on or about April 7 and 8, 2015, and after the controlled purchase of crack cocaine on or about April 8, 2015, CS-4 identified the seller of the crack cocaine as Individual B, a purported associate of Individual A, rather than WILSON. CS-4 later identified the crack cocaine seller as WILSON and admitted to lying to agents about WILSON's identity in order to protect WILSON. CS-4 expected Individual A or another associate of Individual A's to handle the crack cocaine sale to CS-4 on or about April

8, 2015, and was surprised to see WILSON at the transaction. As a result of CS-4's conduct in connection with this transaction, DEA ceased working with CS-4 as a confidential source.

C. On or about April 8, 2015, CS-4 Purchased Approximately 125 Grams of Crack Cocaine from WILSON

8. In or about March and April 2015, CS-4, under the direction and control of agents, made arrangements to purchase approximately 125 grams of crack cocaine from Individual A. During the consensually recorded calls to Individual A, CS-4 told to Individual A that he/she had out-of-town customers who wanted to purchase the crack cocaine.

9. On or about April 7, 2015, at the direction of agents, CS-4 made a consensually recorded telephone call to one of Individual A's associates, later identified as WILSON,¹ using telephone number (708) 295-6195 (the "Wilson Phone"),² during which conversation, WILSON said, "Awe yeah what's up?"³ CS-4

¹ The identification of WILSON and WILSON's voice in this Affidavit is based on the following: First, surveillance agents observed WILSON meet with CS-4 in person on April 8, 2015. After CS-4 admitted to lying about the identity of the individual that sold CS-4 the crack cocaine on April 8, 2015, as detailed above in Paragraph 7, CS-4 admitted that the individual was WILSON. As a result, agents compared a driver's license photograph of WILSON to the individual captured on video recording on April 8, 2015, and determined that WILSON was the person that met with CS-4. Second, the UC positively identified a driver's license photograph of WILSON as the person CS-4 met with on April 8, 2015. Third, during recorded telephone conversations, WILSON arranged to personally meet with CS-4 on April 8, 2015, and subsequently surveillance agents observed WILSON meet with CS-4 on that date.

² Agents verified the consensually recorded calls between CS-4 and the Wilson Phone referenced in this Affidavit with the phone records for the Wilson Phone.

³ Some of the consensually-recorded conversations and meetings (the "recorded conversations") have been summarized in this Affidavit. The language that is quoted from the recorded conversations throughout this Affidavit is based upon a preliminary review of the recorded conversations, and not on final transcripts of the recorded conversations. The

said, "Now listen they will be here at 2:30 the latest [CS-4's narcotics customers would be in Chicago at 2:30 p.m.]" WILSON responded, "Right." CS-4 asked, "So they want the lick so what's the price [CS-4's customers wanted to know the price of the crack cocaine]?" WILSON said, "Twenty Seven [\$2,700]." CS-4 said, "No for the whole thing bro [CS-4 wanted the price for the entire 4.5 ounces (125 grams) of crack cocaine]." WILSON said, "They want it hard right [WILSON confirmed that the customers wanted crack cocaine and not powder cocaine]?" CS-4 said, "Yeah." WILSON said, "Ok this what we gonna do right? I told you what the price was, huh." CS-4 responded, "I don't think you was listening to me."

10. Later that day, at approximately 7:25 p.m., CS-4 made a consensually recorded telephone call to WILSON, using the Wilson Phone, during which conversation CS-4 said, "Hey my people will be here tomorrow Joe at 2:30 no later 2:30 or three o'clock." WILSON responded, "You sure man?" CS-4 said, "I'm positive bro, I'm positive, yeah you said the price forty five right [CS-4 confirmed the price for 125 grams of crack cocaine was \$4,500]"⁴ WILSON said, "Yeah I've got to pick my daughter up at about 4:30 man." CS-4 said, "Oh we'll be there way before then

times listed for the recorded conversations are approximate. The summaries do not include all statements or topics covered during the course of the recorded conversations and include my interpretation of words and phrases used in the recorded conversations. At various points in the Affidavit I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on information received from confidential sources, the contents and context of the recorded conversations, events occurring before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

⁴ CS-4 and WILSON did not specifically discuss the price of \$4,500 with each other before this call. According to CS-4, during the calls noted in Paragraph 6, he/she had previously discussed purchasing 125 grams of crack cocaine from Individual A in exchange for \$4,500.

way before then . . . Wait where you want to meet?" WILSON said, "Wait we probably meet by we probably meet by off 17th somewhere, well you know what off Roosevelt and 1st." CS-4 confirmed, "1st and Roosevelt ok." WILSON explained, "Probably by that Poor Boys, just call me an hour ahead of time man." CS-4 confirmed, "Alright."

11. On or about April 8, 2015, at approximately 12:55 p.m., agents met with CS-4 and an undercover law enforcement officer purporting to be CS-4's customer (the "UC") at a predetermined location. Agents searched CS-4 and did not find any contraband or excessive amounts of money. At approximately 1:13 p.m., agents equipped CS-4 with audio and video recording equipment in order to consensually record CS-1 and the UC's meeting with WILSON, and provided CS-1 with \$4,500 in pre-recorded buy money to make the crack cocaine purchase. CS-1 and the UC then departed the area in the UC's vehicle followed by surveillance agents.

12. At approximately 1:16 p.m., CS-4 made a consensually recorded telephone call to WILSON, using the Wilson Phone, during which conversation, CS-4 said, "Bro, I'll be at Burger King in about 15 minutes." WILSON confirmed, "Be there in 15 minutes?" CS-4 said, "I'm gonna park in Burger King." WILSON confirmed, "Alright."

13. At approximately 1:46 p.m., CS-4 made a consensually recorded telephone call to WILSON, using the Wilson Phone, during which conversation CS-4

informed WILSON that he/she was at the Burger King and WILSON explained that he would arrive in approximately 10 minutes.

14. At approximately 1:46 p.m., CS-4 received a telephone call from WILSON, using the Wilson Phone, which call was consensually recorded, and during which call a background conversation between two unidentified individuals could be heard. During that conversation one individual could be heard saying, “But make sure you count that bread and shit before they pull off [make sure you count the narcotics proceeds before leaving].” The other unknown individual responded, “Forty-five dollars, oh ok [\$4,500].”

15. At approximately 1:49 p.m., surveillance agents observed a black Chevrolet Cavalier, bearing Illinois registration S608557 (the “black Chevy”), arrive and park next to the UC’s vehicle. CS-4 then exited the UC vehicle and entered the rear passenger seat of the black Chevy. Agents observed WILSON sitting in the front passenger seat of the black Chevy, and a female in the driver’s seat. While CS-4 was getting into the black Chevy, WILSON’s face was clearly captured on the video recording. According to the UC, the UC observed CS-4 and WILSON make a hand to hand exchange while inside the black Chevy. Soon thereafter, surveillance agents and the UC observed CS-4 exit the black Chevy and immediately enter the UC’s vehicle, at which time the UC vehicle departed the area. According to the UC, when CS-4 reentered the UC’s vehicle, he/she had a clear plastic baggie containing suspected crack cocaine.

16. At approximately 2:00 p.m., CS-4 and the UC met with investigating agents at a predetermined location, at which point CS-4 gave the clear plastic bag containing suspected crack cocaine to the agents. Investigating agents retrieved the audio and video recording equipment from CS-4. Agents then searched CS-4 and did not discover any contraband or excessive amounts of money. Based on the appearance, color, and texture of the substance, and based on the agents' training and experience, the substance appeared to be crack cocaine. An agent performed a field test of the substance contained in the plastic baggie, which indicated as positive for the presence of cocaine.

17. On or about July 13, 2015, a forensic scientist with the DEA North Central Laboratory informed an agent that the lab had determined that the substance WILSON sold to CS-4 on April 8, 2015, contained approximately 122.1 grams of cocaine base.

III. CONCLUSION

18. Based upon the above information, there is probable cause to believe on or about April 8, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, JAMES WILSON, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing 28 grams or more of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

DONALD C. WOOD
Special Agent
Drug Enforcement Administration

SUBSCRIBED AND SWORN to before me on July 15, 2015.

MICHAEL T. MASON
United States Magistrate Judge