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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LEON LONDON,  
also known as "Bookie"

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 September 24, 2014, at Oak Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

*Code Section**Offense Description*Title 21, United  
States Code, Section  
841(a)(1)defendant LEON LONDON 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.

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DONALD C. WOODSpecial Agent, Drug Enforcement  
Administration

Sworn to before me and signed in my presence.

Date: July 15, 2015

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*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

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**AFFIDAVIT**

I, DONALD C. WOOD, being duly sworn, state as follows:

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 Federal and State controlled substance laws, including 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 an arrest

warrant against defendant LEON LONDON, also known as “Bookie,” it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the individuals and events described in this Affidavit. This Affidavit is made in support of a Criminal Complaint that charges LONDON with distribution of 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) laboratory analysis reports; (d) surveillance reports; (e) criminal history records; (f) information from confidential informants; and (g) my training and experience and the training and experience of other law enforcement agents with whom I have consulted.

#### **FACTS ESTABLISHING PROBABLE CAUSE**

5. As described further below, beginning on or about September 24, 2014, LONDON coordinated a narcotics transaction with an individual who, unbeknownst to him, was a cooperating source (“CS-3”)<sup>1</sup> working under the direction and control

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<sup>1</sup> CS-3 began cooperating in this investigation in or around August 2014, and has provided agents with reliable background and intelligence information relative to LONDON that has been independently corroborated by law enforcement through consensual recordings between CS-3 and LONDON and the controlled buy of cocaine base from LONDON detailed in this Affidavit. CS-3 has a 2008 felony conviction for possession of a controlled substance. CS-3 was arrested earlier this year for narcotics and firearm offenses, prior to his cooperation in this investigation, and is cooperating in the hope of receiving consideration regarding the charging decision in connection with that arrest.

of law enforcement. CS-3 knew LONDON based on past narcotics transactions between CS-3 and London. During the transaction, LONDON sold CS-3 approximately 54.3 grams of crack cocaine in exchange for \$2,160 in United States currency.

6. On or about September 23, 2014, CS-3 arranged to purchase 63 grams of crack cocaine from LONDON.<sup>2</sup> At approximately 1:19 p.m., at the direction of agents, CS-3 made a consensually-recorded call to LONDON, using telephone number (630) 926-7267 (the “London Phone”), during which call CS-3 asked LONDON, “Um, what was the ticket though [CS-3 asked LONDON how much crack cocaine he intended to buy would cost]?”<sup>3</sup> LONDON responded, “Aw, for that, uh, for that thang?” CS-3 replied, “Yeah.” LONDON said, “For that thang, he’s gonna want 120.” CS-3 then asked, “Um, for a six-trey [CS-3 asked whether LONDON was

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<sup>2</sup> The identification of LONDON and LONDON’s telephone in this Affidavit is based on the following: First, surveillance agents observed LONDON meet with CS-3 in person on September 24, 2014. Agents compared a driver’s license photograph of LONDON to the individual they observed on September 24, 2014, and determined that LONDON was the person that met with CS-3. Second, CS-3 positively identified a driver’s license photograph of LONDON as the person CS-3 met with on September 24, 2014. Third, public databases and one of LONDON’s social media accounts list (630) 926-7267 as LONDON’s telephone number. Fourth, LONDON arranged to meet with CS-3 in person on September 24, 2014, and surveillance agents subsequently observed LONDON meet with CS-3 on that date.

<sup>3</sup> Some of the consensually-recorded telephone and text message 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 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 CS-3, 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.

talking about 63 grams of crack cocaine]?” LONDON responded, “Naw, naw, naw. Oh, naw, naw, naw. Just do 120 times 18 [LONDON told CS-3 to multiply 120 by 18 to determine the price of 63 grams of crack cocaine, which is \$2,160].” CS-3 asked, “Huh?” LONDON repeated, “Just do 120 times 18.” CS-3 said, “120 times 18? Alright, ok.”

7. On or about September 24, 2014, at approximately 10:33 a.m., at the direction of agents, CS-3 made a consensually-recorded call to LONDON, using the London Phone, during which CS-3 said, “What’s up, homie?” LONDON responded, “What up baby, yo people talk to you?” CS-3 replied, “Yeah, no, when I seen that you had called goddamit, I had called them, you know what I’m saying?” LONDON said, “Alright, call me right back and let me know. I’m fent to go grab it so . . . [LONDON told CS-3 to call him back to confirm the transaction so that he could go pick up the narcotics]” CS-3 said, “Alright, go on and grab it, they ready, shit. I told them come on, you had called me, so as soon as you called me I called them [CS-3 told LONDON to go ahead and pick up the narcotics].” LONDON responded, “Okay then, alright.” LONDON later asked, “Ok, um, so did they give you a time? I’m finna go put it together right now and stuff.” CS-3 responded, “Alright, ok, just give me a, um, just give me a, just shit, I told them to come so it will take them about two hours to come.” LONDON said, “I can’t hear you big bruh.” CS-3 said, “I said it’s gonna be about two hours before they could come and shit.” LONDON responded, “Okay, bet. Okay, I’m finna put it together. You confirmed it, so I’m

finna put it together [LONDON agreed to pick up the narcotics for the transaction because CS-3 confirmed that the transaction would occur].”

8. On September 24, 2014, at approximately 12:00 p.m., agents met with CS-3 at a predetermined location. At approximately 12:11 p.m., at the direction of agents, CS-3 made a consensually-recorded call to LONDON, using the London Phone, during which CS-3 said, “I just talked to them, I just talked to them, they, um, they said they should be here in like 30, 45 minutes, some shit like that. Um, so you want, you trying to um, like get in, get it in and get the fuck on? So probably like right off the expressway?” LONDON responded, “Yeah, yeah. Okay, bet.” Later, CS-3 said, “So, um, so like, probably right off the expressway on um, Harlem or like um, yeah, on like Harlem, or um Harlem and Roosevelt.” LONDON responded, “Okay, bet. We’ll choose it up, when they get there I’m gonna, maybe by like um, we gotta do a restaurant, like a um, Wendy’s. We’ll do that Wendy’s right there. On Madison.” CS-3 asked, “The Wendy’s?” LONDON responded, “Yeah, it’s right there by the expressway. Right there on Harlem and Madison.” CS-3 replied, “Yeah, I know what you’re talking about, on Harlem and Madison?” LONDON said, “Yeah.”

9. In preparation for the transaction, at approximately 12:30 p.m., agents met CS-3 at a predetermined location and searched CS-3 and did not find any contraband or excessive amounts of money. Agents equipped CS-3 with audio and video recording equipment to consensually-record CS-3’s meeting with LONDON. Agents placed \$2,160 into an empty coffee cup and gave that coffee cup to an undercover law enforcement officer. At approximately 12:47 p.m., the undercover

law enforcement officer posing as CS-3's customer (the "UC"), accompanied by CS-3, departed the predetermined location for Wendy's in the UC's vehicle.

10. At approximately 1:01 p.m., surveillance agents observed the UC and CS-3 arrive at the Wendy's restaurant located at 11 N. Harlem Avenue, Oak Park, Illinois.

11. At approximately 1:39 p.m., CS-3 received a call from LONDON, using the London Phone, which call was consensually-recorded, during which CS-3 asked, "Yeah, where you at?" LONDON responded, "At the light, bo-bo, right here, right here. I'm finna pull in in this maroon, in my maroon van."

12. At approximately 1:40 p.m., surveillance agents observed a maroon Chevrolet Venture van, bearing Illinois temporary registration 650R840, driven by LONDON and accompanied by an unknown black male passenger, enter the Wendy's parking lot.

13. Surveillance agents then observed CS-3 exit the passenger side of the UC's vehicle, walk across the parking lot with the coffee cup, and enter the backseat of the van from the passenger side. According to CS-3 and the video recording, while in the maroon van, CS-3 removed the \$2,160 from the coffee cup and handed it to LONDON. According to CS-3, LONDON placed a clear plastic bag that contained an off-white, white, rock-like substance in the coffee cup. During the course of the transaction, LONDON's face was captured on the video recording.

14. At approximately 1:42 p.m., surveillance agents observed CS-3 exit the maroon van carrying the coffee cup and return to the UC's vehicle. Surveillance

agents then observed the maroon van exit the Wendy's parking lot. Surveillance agents subsequently observed the UC's vehicle exit the Wendy's parking lot.

15. The UC and CS-3 drove to a predetermined location to meet with agents. At that meeting, agents retrieved the coffee cup from the UC, which contained a clear plastic bag containing an off-white rock-like substance. Agents also recovered the audio and video recording equipment from CS-3, and then searched CS-3 and did not find any contraband or excessive amounts of money.

16. 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. Agents conducted a field test of the off-white rock-like substance contained in the clear plastic bag, which indicated positive for the presence of cocaine.

17. On or about March 31, 2015, the DEA North Central Laboratory determined that the off-white rock-like substance that LONDON sold to CS-3 on or about September 24, 2014, contained approximately 54.3 grams of cocaine base.



## CONCLUSION

18. Based on the above information, there is probable cause to believe that, on or about September 24, 2014, at Oak Park, in the Northern District of Illinois, Eastern Division, and elsewhere, LEON LONDON (also known as “Bookie”), knowingly and intentionally distributed 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).

FURTHER AFFIANT SAYETH NOT.

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DONALD C. WOOD  
Special Agent, Drug Enforcement  
Administration

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

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MICHAEL T. MASON  
United States Magistrate Judge