UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED
Dec 02, 2020
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America
v.

Clarence Courtney

Defendant

Case No. 2:20-mj-0179 AC

SEALED

CRIMINAL COMPLAINT

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

On or about the dates of September 22, September 28, October 29, and November 18, 2020 in the county of Solano in the Eastern District of California, the defendant(s) violated:

Code Section	*Offense Description*
Count One: 21 U.S.C. § 841(a)(1)	Distribution of heroin and at least 50 grams of a mixture and substance containing methamphetamine
Counts Two-Four: 21 U.S.C. § 841(a)(1)	Distribution of at least 50 grams of a mixture and substance containing methamphetamine

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/ Brian Nehring
Complainant's signature

Brian Nehring, DEA Special Agent
Printed name and title

Sworn to before me and signed telephonically.

Date: December 2, 2020

City and state: Sacramento, California

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT, ARREST WARRANT, AND CRIMINAL COMPLAINT

I, Special Agent Brian Nehring of the DEA, being duly sworn, depose and state as follows:

Background and Expertise

1. I am a Special Agent of the Drug Enforcement Administration (DEA), San Francisco Field Division, and have been so employed since 1991. I have had numerous assignments since beginning with DEA, including being assigned to the Clandestine Laboratory Enforcement Team from 1997 to 1999, the Oakland Resident Office between 1999 and 2002, and the Mobile Enforcement Team (MET) between 2002 and 2004. I have been assigned to the Sacramento Division Office since September of 2004.

2. I have received specialized training in narcotic investigation matters including, but not limited to, drug interdiction, drug detection, money laundering techniques and schemes, drug identification, and asset identification and removal, from the Drug Enforcement Administration (DEA). In addition, I graduated from the DEA Basic Agents Academy at the FBI Academy at Quantico, Virginia. In total, I have received in excess of 500 hours of comprehensive formalized classroom instruction in those areas outlined above.

3. I have assisted in the execution of more than four hundred (400) warrants to search particular places or premises for controlled substances and/or related paraphernalia, indicia and other evidence of violations of federal drug narcotics statutes. As a result, I have encountered and become familiar with various tools, methods, trends, and paraphernalia and related articles utilized by traffickers in their efforts to import, conceal, manufacture and distribute controlled substances. Central to all trafficking efforts, regardless of the drug, is the traffickers' effort to make a profit from those dealings or transactions, either for the purchase of additional substances or material gain. I have been actively involved as case agent in excess of two hundred (200) investigations and have talked with confidential informants involved in the trafficking of narcotics, and this has formed the basis of my opinions.

4. I have been qualified as and have testified as an expert witness in both federal and state court in the Northern and Eastern Districts of California and in counties including Alameda, Contra Costa, Solano, Sacramento and others. These areas of qualification have included possession for sale, possession with intent to distribute, manufacturing of a controlled substance and cultivation.

5. The facts set forth in this Affidavit are known to me as a result of my personal participation in this investigation, through conversations with other agents and detectives who have participated in this investigation, and from reviewing official reports, documents, and other evidence obtained as a result of this investigation. This Affidavit is not an exhaustive enumeration of the facts that I have learned during the

course of this investigation but, instead, are facts that I believe support a finding of probable cause to search the requested locations.

Scope of Requested Criminal Complaint and Search Warrant

6. This Affidavit is submitted in support of a Criminal Complaint charging **Michael Renay WILLIAMS and Clarence COURTNEY** with distribution of heroin, a Schedule I Controlled Substance, and distribution of at least 50 grams of a mixture and substance containing methamphetamine, a Schedule II Controlled Substance, in violation of 21 U.S.C. §§ 846 and 841(a)(1) as follows:

   Count One: Distribution of heroin and at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1), on or about September 22, 2020;

   Count Two: Distribution of at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1), on or about September 28, 2020;

   Count Three: Distribution of at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1), on or about October 29, 2020;

   Count Four: Distribution of at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1), on or about November 18, 2020.

7. This Affidavit is also submitted in support of a search warrant to search the following locations:

   A. The current residence of Clarence COURTNEY located at **806 Sheridan Street, #B, Vallejo, California**;

   B. COURTNEY's suspected stash pad located at **229 Contra Costa Street, Vallejo, California**;

   C. The person of **Michael Renay WILLIAMS**;

   D. The person of **Clarence COURTNEY**;

   E. The T-Mobile cellular telephone with call number **(707) 209-9835** subscribed to and used by COURTNEY;

   F. The Metro PCS cellular telephone with call number (**707) 655-6785** currently used by WILLIAMS;

G. **A 2003 Audi Sedan, California License Plate #8PJK556**, black, registered to COURTNEY and used to deliver methamphetamine on 11-18-2020

H. **A 1995 Jeep, California License Plate #6UPD626**, gold, registered to COURTNEY and believed used to facilitate and/or deliver methamphetamine on 09-22-2020;

I. **A 2004 Nissan Maxima, 7RAR028**, silver, used by COURTNEY to deliver methamphetamine on 10-29-2020; and

J. All other vehicles over which any owner, occupant, or resident of the above premises has dominion and control, as determined by agent observation of such person operating or accessing the vehicle; DMV records showing ownership or use of the vehicle; witness statements establishing ownership or use of the vehicle; or car keys to operate the vehicle found in the actual or constructive possession of such person

8. I believe that Clarence COURTNEY is a large-scale methamphetamine and heroin trafficker currently operating within the Eastern District of California. Based upon the ongoing federal investigation detailed below, I believe that COURTNEY has been distributing large amounts of methamphetamine and heroin in the Eastern District of California throughout 2020 and that he has been supplying Michael Renay WILLIAMS. Between September and November 2020, I have purchased approximately two pounds of methamphetamine from WILLIAMS. COURTNEY has been present for these transactions and identified by WILLIAMS as his source of supply. I also believe that COURTNEY resides at 806 Sheridan Street, Vallejo, California and that it is highly likely that he is storing methamphetamine and other indicia of drug trafficking at this residence and the residence located at 229 Contra Costa Street, Vallejo, California. This Affidavit therefore requests authority to search the locations described in Attachment A in order to located and seize the items described in Attachment B as evidence and instrumentalities of violations of 21 U.S.C. §§ 846 and 841(a)(1) (distribution, possession with intent to distribute, and conspiracy to distribute methamphetamine and heroin).

<u>**Probable Cause**</u>

Background

9. Beginning in 2020, I spoke with a Confidential Source, hereinafter referred to as the CS, regarding the methamphetamine and heroin trafficking activities of an individual identified as **Michael Renay WILLIAMS**.

10. At this time the CS was providing me with information solely in hopes of receiving financial compensation. The CS has a limited criminal history, including primarily misdemeanor arrests and convictions, no history of violence and no history of firearms offenses. The CS has never provided assistance in hopes of receiving consideration in a pending matter and the CS has had no felony matters during the entire time I have known the CS. The CS's information and assistance was previously independently corroborated in the prior investigations and was used in prosecutions that led to state felony convictions. I have never found the CS to be false or misleading, and the CS's descriptions of drug and drug dealing have been entirely consistent with my own training and experience in this area. The CS's assistance and information has been incorporated in federal search warrants, including search warrants for methamphetamine and other drugs, which has led to the seizure of multiple pounds of methamphetamine and other drugs, firearms, US Currency and the successful federal prosecution of multiple individuals. For these reasons, I consider the CS reliable.

11. The CS related that he/she had known Mike, subsequently identified by the CS from a California Department of Motor Vehicles (DMV) driver's license photograph as **Michael Renay WILLIAMS**, for over a year. The CS stated that WILLIAMS resided in Vallejo, California and regularly sold ounce quantities of methamphetamine and heroin, primarily out of the Blue Rock Lounge on Springs Street. WILLIAMS claimed to have been in California state prison multiple times, particularly the Special Housing Unit (SHU).

12. I subsequently learned through NCIC inquiries that WILLIAMS has an extensive criminal history including multiple felony convictions in California for offenses including, but not limited to: Grand Theft (1984), Transportation/Sales of a Controlled Substance (1989 – 4 years state prison sentence), Burglary (1992 – 2 years state prison sentence), Burglary with Prior (1997), Theft (2001), Possession of a Controlled Substance (2007) and arrests for offenses including Possession of a Controlled Substance for Sale, Assault, Felon in Possession of a Firearms, and Terrorist Threats, which led to numerous probation and parole violations in lieu of the filing of new charges and to numerous additional prison commitments.

13. The CS stated that he/she was aware that WILLIAMS's drug source of supply was a person whom WILLIAMS referred to as "CC," subsequently identified as Clarence COURTNEY, who resided at **806 Sheridan Street, Unit B, Vallejo, California**. The CS stated that he/she and others had accompanied WILLIAMS to this location when WILLIAMS parked outside and entered the residence indicating he was meeting his source "CC," and after which he returned with ounce quantities of methamphetamine and heroin.

14. The CS related that he/she and others had been instructed by WILLIAMS to meet him in front of the residence at **229 Contra Costa Street, Vallejo, California** on more than one occasion in the last year when WILLIAMS claimed he was meeting COURTNEY to obtain drugs. The CS and others had on more than one occasion

observed WILLIAMS meet an older black male adult, whom the CS believed was "CC," in front of the residence and then walk with this individual to the rear yard where the entrance to the rear residence (229) was located and then subsequently return with methamphetamine and heroin WILLIAMS claimed to have obtained from the source "CC." The CS believed, based on WILLIAMS actions, that COURTNEY was using this location as a place to store and distribute methamphetamine and heroin, *i.e.*, a stash pad, in addition to his residence on Sheridan Street.

15. Inquiries with Thomas and Reuters CLEAR revealed that in recent years, including in 2020, Clarence COURTNEY listed a resident address of 806 Sheridan Street, #B, Vallejo, California.

16. Inquiries with the California DMV revealed that COURTNEY listed 806 Sheridan Street, Apt. B, Vallejo, California, from approximately 2014 through 2020 and currently has two vehicles registered in his name at this address, including a **2003 Audi Sedan, California License Plate #8PJK556**, and a **1995 Jeep, California License Plate #6UPD626.**

17. The CS also provided a cellular telephone number for WILLIAMS that he was using as of September 2020 to distribute drugs; this telephone was found to be subscribed to WILLIAMS. Analysis of the tolls for WILLIAMS' telephone showed it in high-frequency contact with telephone **707-209-9835**. Inquiries with T-Mobile revealed that this number was subscribed in the name of Clarence COURTNEY at 806 Sheridan Street, Vallejo, California.

18. I subsequently learned through NCIC inquiries that COURTNEY has an extensive criminal history including, but not limited to, multiple felony convictions and jail and prison sentences for Possession of a Controlled Substance for Sale (2003, 2004, 2010 and 2013) as well as multiple additional drug and firearms arrests (Felon in Possession of a Firearm/Possession of a Controlled Substance and a Firearm) apparently leading to violations of probation and parole in lieu of the filing of new charges and additional prison commitments.

September 22, 2020 Transaction

19. On September 22, 2020, I monitored and recorded the CS telephonically contacting WILLIAMS and relating that there was a buyer who wished to purchase approximately a quarter pound of methamphetamine. WILLIAMS requested to meet at the Blue Rock Lounge parking lot on Springs Street in Vallejo. I accompanied the CS to this location, and the CS introduced me to WILLIAMS as the buyer. WILLIAMS indicated he could go directly to his source of supply's residence and obtain the quarter pound of methamphetamine for $1600.00. I agreed. I also asked WILLIAMS if he could obtain a sample of heroin, which he stated he could.

20. WILLIAMS was then followed by agents from the bar parking lot directly to the residence located at 806 Sheridan Street, Vallejo, California where he parked in front

and entered Apartment B (the right side of the duplex). Agents observed COURTNEY's **2003 Audi Sedan, California License Plate #8PJK556** parked in front of the residence. While WILLIAMS was inside the residence, the CS called WILLIAMS who stated he was at the source's residence waiting for him to return.

21. Shortly thereafter, agents observed COURTNEY arrive in his gold **1995 Jeep, California License Plate #6UPD626**. Agents observed COURTNEY carry a duffel bag from the rear of the vehicle into the residence. WILLIAMS then contacted the CS and related that he had just obtained the methamphetamine and the heroin from the source and was on his way back to the Blue Rock Lounge parking lot. WILLIAMS was observed exiting the residence and then traveling directly back to the bar parking lot where he sold me 142 grams of suspected methamphetamine for $1600.00 and approximately a quarter ounce of suspected heroin (36 gross grams) for $250.00. Following this transaction, WILLIAMS was followed directly back to 806 Sheridan Street, #B, Vallejo. I believe WILLIAMS returned to deliver the money for the drugs to COURTNEY. The appearance of the substances purchased were entirely consistent in my training and experience with methamphetamine and heroin.

22. Subsequent analysis of the tolls for WILLIAMS on 09-22-2020 showed his telephone in contact with COURTNEY's identified telephone **707-209-9835** during the times prior to, during, and following the above described transaction. I believe these contacts were WILLIAMS and COURTNEY telephonically arranging their drug distribution activities.

September 28, 2020 Transaction

23. Following the transaction on 09-22-2020, the CS telephonically contacted and text messaged WILLIAMS and related that I was returning to Vallejo on 09-28-2020 and wished to purchase another quarter pound of methamphetamine. WILLIAMS indicated that he had arranged this and again agreed to meet at the Blue Rock Lounge parking lot on Springs Street in Vallejo on that date. I accompanied the CS to this location and at this location met with WILLIAMS and purchased approximately 142 gross grams of suspected methamphetamine for $1600.00 from WILLIAMS. Agents identified COURTNEY as the passenger in WILLIAMS' vehicle. The appearance of the substance purchased were entirely consistent in my training and experience with methamphetamine.

24. I told WILLIAMS that I had additional money with me and could purchase a few additional ounces of methamphetamine if he could obtain them immediately. WILLIAMS indicated he could and that he was going directly to the source's residence in South Vallejo after this transaction and would obtain more and return to the bar to meet me. Agents then followed WILLIAMS and COURTNEY directly to **806 Sheridan Street, Unit B, Vallejo, California**. While inside the residence, WILLIAMS telephonically contacted the CS and indicated he was at the source of supply's residence and would return back to meet me shortly at the bar. I then traveled back to the bar by myself and WILLIAMS was followed by agents directly

from COURTNEY's residence to the bar parking lot where he sold me an additional two ounces of suspected methamphetamine (94 gross grams) for $840.00. The appearance of the substance purchased were entirely consistent in my training and experience with methamphetamine.

25. Subsequent analysis of the tolls for WILLIAMS on 09-28-2020 showed his telephone in contact with COURTNEY's identified telephone **707-209-9835** during the times prior to, during and following the above described transaction. I believe these contacts were WILLIAMS and COURTNEY telephonically arranging their drug distribution activities.

October 29, 2020 Transaction

26. Following the transaction on 09-28-2020, I telephonically contacted and text messaged WILLIAMS and related that I was returning to Vallejo on 10-29-2020 and wished to purchase approximately a half pound of methamphetamine. WILLIAMS indicated that he would contact his source and arrange this transaction. He ultimately indicated he could provide this methamphetamine for $2550.00 and again agreed to meet at the Blue Rock Lounge parking lot on Springs Street in Vallejo on that date. I subsequently met with WILLIAMS at this location on this date, and he indicated that his source was running late. I told WILLIAMS to call me when the source arrived and I departed.

27. Shortly thereafter, agents observed COURTNEY arrive in a **silver 2004 Nissan Maxima, California license plate #7RAR028** which he parked in the bar parking lot next to WILLIAMS's vehicle. Immediately upon COURTNEY arriving, WILLIAMS called me and stated that the source had mistakenly gone to a particular residence where he had thought he was going to meet WILLIAMS but had subsequently arrived at the bar and that I should return immediately. I drove directly back to this location and observed WILLIAMS lean into COURTNEY's vehicle and then carry a bag containing the approximately half-pound of methamphetamine over to me. I paid WILLIAMS the agreed $2550.00 USC in exchange for this suspected methamphetamine (285 gross grams). WILLIAMS took the money back to COURTNEY's vehicle as I departed.

28. The DEA Western Regional Laboratory subsequently analyzed the substance purchased from WILLIAMS and COURTNEY on 10-29-2020 as being 224 grams of 100% pure Methamphetamine.

29. Following the transaction, agents followed COURTNEY in this vehicle as he drove directly to an alley behind the residence located at 227 Contra Costa Street, Vallejo, California. Agents noted that the front structure on the lot displayed two numbers, 227 and 229, and that COURTNEY was observed driving through the alley into an entrance of the rear yard and that there was a separate new-model building in this rear yard that appeared to correspond with 229. I noted that the CS had previously related that COURTNEY kept drugs at this location (a "stash pad") and that he had

previously had WILLIAMS meet him there on multiple occasions to obtain methamphetamine and heroin which WILLIAMS had displayed upon exiting. At this time, agents observed COURTNEY meet with an individual and enter the rear residence at 229 Contra Costa Street where he remained for several minutes before exiting and departing. COURTNEY was then followed directly back to 806 Sheridan Street where he was observed entering his residence on the right of the duplex (Unit B).

30. Toll analysis for COURTNEY's telephone for October 29, 2020 showed that in the time immediately prior to this transaction while WILLIAMS was waiting for COURTNEY's arrival and in the time immediately following this transaction, immediately prior to COURTNEY arriving at 229 Contra Costa Street, Vallejo, California, COURTNEY's telephone was in contact with 707-655-3066. Intelligence Analyst Erin McKenna related to me that this number was subsequently found to be listed to Jeffrey Joel PRYOR of Vallejo, California. Inquiries with Thomas and Reuters CLEAR database revealed that PRYOR has most recently provided 229 Contra Costa Street, Vallejo, California as a resident address (September of 2020).

31. Inquiries with NCIC revealed that Jeffrey Joel PRYOR had an extensive criminal history between 2002 and 2017 for offenses including, but not limited to, identity theft for credit, threats, vandalism, false identification, receiving stolen property (felony conviction in 2005), burglary, etc. I also noted that PRYOR had numerous arrests for Possession of a Controlled Substance as well as an arrest in Napa County in 2012 for Possession of a Controlled Substance for Sale, although there was no listed adjudication. I further noted that PRYOR's last arrest was for Possession of a Controlled Substance in Solano County in 2017. I also determined that per CLEAR records a death notice had been filed in 2015 for PRYOR with the one and only social security number linked to PRYOR in his credit history and on his NCIC criminal history. I believe that these inconsistent records are indicative of either the use of a false name to hide from law enforcement, or fraudulent application for death benefits. I note that in my training and experience, drug traffickers often use false names to hide activities from law enforcement.

32. During subsequent surveillance at 229 Contra Costa Street, Vallejo, California, Agents observed a black 2016 Nissan Sedan, California license plate #8HZV928, parked in the rear driveway accessing 229 Contra Costa Street, Vallejo, California. DMV records indicated that this vehicle was registered to Jacqueline PIERCE at 229 Contra Costa Street, Vallejo, California. Inquiries with Thomas and Reuters CLEAR database revealed that PIERCE has most recently provided this location as a resident address (2020) and that she and PRYOR are almost the only persons ever to list this address. CLEAR records also revealed that PIERCE and PRYOR had in the past provided the same addresses during the same time periods.

33. Inquiries with NCIC revealed that PIERCE had an extensive criminal history documenting arrests and convictions between 1981 and 2017 in California, Virginia, Colorado and Texas, including prison commitments in California and Colorado for

felony convictions including multiple counts in both states of Grand Theft, Burglary and Robbery. I also noted that PIERCE was committed to Colorado State Prison in 1999 for a felony Dangerous Drugs conviction and a Parole Violation.

34. I subsequently learned from inquiries with Vallejo Police Department, CLEAR inquiries and various databases that 229 was not listed as a real address until the last couple of years and that Street View images of this location prior to 2020 did not display the numerals 229 on the front structure on the lot, only 227. I observed the rear unit on this lot accessed by the alley and it appeared to me to be a very new prefabricated mobile-home type structure which did not appear on earlier satellite imagery of this location. Vallejo Police Department records also revealed that in early 2020, Jacqueline PIERCE was listed as the reporting person for an attempted residential burglary at 229 Contra Costa Street, Vallejo, California, which was the only time this address has ever listed to an event or call in Vallejo PD records, leading me to believe that this location, e.g. the apparent new modular home in the rear yard of the property accessed by the entrance in the alley, was only recently assigned the address of 229.

35. Based upon the CS relating to me that COURTNEY had been using 229 Contra Costa Street, Vallejo, California as a location to store drugs and to deliver drugs to WILLIAMS in the past; the fact that WILLIAMS informed me that his source who had just arrived (COURTNEY) with the drugs on 10-29-2020 after having mistakenly gone to another residence where he had believed he was going to meet WILLIAMS; COURTNEY telephonically contacting an individual (PRYOR) at a telephone subscribed to the same location prior to the transaction and immediately after the transaction; COURTNEY traveling to 229 Contra Costa Street immediately following the transaction, entering briefly and then departing within a couple of minutes; and the criminal histories of PRYOR and PIERCE; I believe that it is highly likely that COURTNEY is still using 229 Contra Costa Street, Vallejo, California as a drug storage and distribution location and that he is coordinating accessing this location with the occupants (PRYOR and PIERCE) in order to distribute these drugs.

November 18, 2020 Transaction

36. Following the transaction on 10-29-2020, I telephonically contacted and text messaged WILLIAMS and related that I was returning to Vallejo on 11-18-2020 and wished to purchase approximately a half pound of methamphetamine, possibly three-quarters of a pound. WILLIAMS indicated that he would contact his source and arrange this transaction and would find out the price. Shortly thereafter, WILLIAMS contacted me and stated that his source had requested that he ask me if I would purchase a full pound as he would get a better price for me, $3700.00. I agreed to this and we agreed to meet between 2pm and 3pm at the Blue Rock Lounge on 11-18-2020.

37. On this date and time, agents observed WILLIAMS in the parking lot at the rear of the Blue Rock Lounge. After 2pm, agents observed COURTNEY's **2003 Audi**

Sedan, California License Plate #8PJK556 parked in the rear lot next to WILLIAMS's vehicle. As I was driving in route to this location, WILLIAM called me and advised me that his source was at the location waiting. I arrived and observed COURTNEY in the vehicle and WILLIAMS talking to him. I then observed WILLIAMS lean into the vehicle and then lean out carrying a paper bag which he walked directly over to me. I examined this item and observed that was in the paper bag and observed that it was a plastic and foil wrapped bundle containing a vacuum seal bag further containing approximately a pound of suspected methamphetamine. WILLIAMS apologized for the difficulty in opening the package and stated he gave it to me the same way COURTNEY just gave it to him. I paid WILLIAMS the agreed $3700.00 USC in exchange for this suspected methamphetamine (599 gross grams). WILLIAMS took the money back to COURTNEY's vehicle as I departed. COURTNEY was then followed by agents directly back to 806 Sheridan Street where he was observed parking and entering Unit B.

38. I performed a presumptive field test on the substance purchased on 11-18-2020 which tested positive for methamphetamine.

39. On November 29, 2020, I was contacted by WILLIAMS from a new telephone number, **707-655-6785**. WILLIAMS stated that his other phone had been stolen and this was his new number. I told WILLIAMS I anticipated coming to Vallejo in the next week to obtain approximately three pounds of methamphetamine. WILLIAMS stated he would talk to his source of supply and this would not be a problem. I subsequently verified that this number (707-655-6785) was an unlisted new Metro PCS telephone.

Training and Experience Regarding Drug Trafficking and Drug Traffickers

40. As a result of my experience and training, I have learned that traffickers who deal in various quantities of controlled substances, or those that assist in that venture, maintain and tend to retain accounts or records of those transactions. Such records detail amounts outstanding, owed, or expended, along with records tending to indicate the identity of co-conspirators. These records may be kept on paper or contained in memory calculators or computers. It is also my experience that these traffickers tend to keep these accounts and records in their residence and in the areas under their control. It is my training and experience, that in the case of drug dealers, evidence is likely to be found where the dealers live. It is also my training and experience that where criminal activity is long-term or ongoing, equipment and records of the crime will be kept for some period of time.

41. Based upon my experience and training, I have learned that drug traffickers often place their assets in names other than their own to avoid detection of those assets by law enforcement and the Internal Revenue Service (IRS); that those persons are commonly family members, friends, and associates who accept title of assets to avoid discovery and detection; that traffickers also often place assets in the ownership of corporate entities to avoid detection by law enforcement agencies and although these

assets are in other individual(s) or corporate names, the traffickers continue to use these assets and exercise dominion and control over them. Typically traffickers keep records of those registrations and transactions in their residence.

42. I have learned that large-scale drug traffickers often have on hand large amounts of United States currency in order to maintain and finance their ongoing business. It has been my experience that drug traffickers often keep large sums of currency, caches of drugs, financial instruments, precious metals, jewelry, automobiles and other items of value and/or proceeds of drug transactions, including evidence of financial transactions related to obtaining, transferring, secreting or spending large sums of money acquired from engaging in the acquisition and distribution of controlled substances in their residence or in the areas under their control.

43. In my experience, traffickers commonly have in their possession, that is, on their person, at their residence and in the areas under their control, firearms, including but not limited to handguns, pistols, revolvers, rifles, shotguns, machine guns and other weapons. Such firearms are used by drug violators to protect their illicit drug trafficking operations, and themselves against law enforcement and other drug violators because the illicit drug trade is an inherently dangerous illegal activity involving large amounts of valuable contraband and drug proceeds. Such property may include, but is not limited to, narcotics and other dangerous drugs, jewelry, narcotic paraphernalia, books, records, ledgers and quantities of currency.

44. In my experience, traffickers commonly have in their possession, that is on their person, at their residences, and their vehicles, and in the areas under their control and which they have free and ready access to, drugs, including but not limited to in this case, heroin and methamphetamine, which they intend to distribute. It is my experience that these drug traffickers commonly utilize these areas (vehicles, residences, properties, etc.) as locations to conceal their narcotics from law enforcement.

45. In my experience, drug traffickers may take or cause to be taken, photographs or videotapes of themselves, their associates, their property, and their product. Such traffickers often maintain photographs and/or videotapes at their residence or in the areas under their control.

46. In my experience, large scale traffickers often maintain in their possession and at their residence fictitious identification, including but not limited to, driver's licenses, employment cards, insurance cards, social security cards, certificates of birth and passports which are obtained by the traffickers and used in an effort to prevent law enforcement identification of the traffickers and their drug trafficking activities.

47. In my experience, drug traffickers often use vehicles to transport and distribute controlled substances to facilitate their trafficking activities. It has also been my experience that traffickers will also use vehicles as locations in which to store controlled substances prior to distribution. During prior investigations, I have

observed that drug traffickers will often use vehicles registered in the names of individuals other than themselves in an effort to avoid detection by law enforcement.

48. In addition, these traffickers tend to attempt to legitimize their assets by establishing domestic and foreign businesses, by creating shell corporations, by utilizing bank haven countries and attorneys specializing in drafting and establishing such entities employed to "launder" the proceeds derived from the distribution of controlled substances.

49. In establishing these entities, the traffickers often must travel to meetings in foreign countries as well as domestically. As a result of that travel, records are generated reflecting travel by commercial and private aircraft, Commercial Ocean and private vessels as well as common carrier(s).

50. Individuals involved in the distribution of heroin and methamphetamine often make, or cause to be made, pictures, videos, movies, or other such items which are or contain photographic or digital images in order to memorialize their methamphetamine and heroin distribution, use, possession, or any other activities surrounding their methamphetamine and heroin trafficking activities, and that such items often identify co-conspirators in their methamphetamine trafficking activities.

51. It has been my experience in the past, and particularly in this case, that when suspects use mobile telephones to communicate with cooperating individuals or undercover agents to set up the methamphetamine deals, records relating to these activities will be found stored in the cellular telephone. And, as relevant to this case, the drug traffickers in this case have made extensive use of text messaging to communicate about his ongoing drug trafficking. I noted that there were numerous apparent "Short Message System," or "SMS," 0 second calls recorded per telephone records between WILLIAMS and COURTNEY, indicative of text message communication, and that I had engaged in narcotics related text messages with WILLIAMS and COURTNEY as well.

52. I know that narcotics traffickers use mobile telephones to communicate with one another, either by voice or text message. Mobile telephones preserve in their memory a history of incoming, outgoing, and missed calls, which can lead to evidence of the telephone numbers of other narcotics traffickers and the dates and times that they and/or the mobile telephone user dialed one another's telephones. Mobile telephones also contain in their memory a telephone book. This allows the user to store telephone numbers and other contact information; the information stored in a telephone used by a narcotics trafficker is evidence of the associations of the narcotics trafficker, some of which are related to his or her illegal business. Mobile telephones also contain in their memory text messages sent, received, and drafted by the mobile telephone user. The text message history of a narcotics trafficker's mobile telephone can contain evidence of narcotics trafficking because it shows the communications or planned communications of a narcotics trafficker and the telephone numbers of those with whom the narcotics trafficker communicated or

intended to communicate. Mobile telephones also have a voicemail function that allows callers to leave messages when the telephone user does not answer. Narcotics traffickers sometimes leave voice messages for each other and this is evidence both of their mutual association and possibly their joint criminal activity. Mobile telephones can also contain other user-entered data files such as “to-do” lists, which can provide evidence of crime when used by a narcotics trafficker. Mobile telephones can also contain photographic data files, which can be evidence of criminal activity when the user was a narcotics trafficker who took pictures of evidence of crime. Mobile telephone companies also store the data described in this paragraph on their own servers and associate the data with particular users’ mobile telephones.

53. As described above and in **Attachment A**, this Affidavit seeks permission to search and seize things that are related to the ongoing heroin and methamphetamine, conspiracy between WILLIAMS and COURTNEY, in whatever form such things are stored. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Even when a user deletes information from a device, it can sometimes be recovered with forensics tools. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

54. It is my opinion, based on my training and experience, and the training and experience of other law enforcement investigators to whom I have spoken, that the items listed in **Attachment B** are items most often associated with the distribution of controlled substances, including heroin and methamphetamine as well as the proceeds from such illegal operations.

55. Based on my experience and training, and after consulting with other law enforcement officers experienced in drug investigations, I know that individuals involved in drug dealing often maintain at their residences, vehicles, and their persons the items described in **Attachment B**. Individuals involved in drug dealing also often maintain paraphernalia for packaging, weighing, cutting, testing, distributing, and identifying controlled substances. Therefore, I am requesting authority to seize all the items listed in **Attachment B** to this Affidavit and incorporated here by reference.

Conclusion

56. The facts set forth in this Affidavit demonstrate probable cause to believe that the locations listed in **Attachment A** to this Affidavit contain evidence of a crime, contraband, fruits of a crime, and other items illegally possessed, property designed for use, intended for use, or used in committing a crime, specifically, of the **Michael Renay WILLIAMS, Clarence COURTNEY, and their co-conspirators**’ ongoing collective effort to distribute and possess with intent to distribute methamphetamine and heroin in violation of 21 U.S.C. §§ 846 and 841(a)(1). Therefore request authority to search the locations listed in **Attachment A** and to seize the items listed in **Attachment B**.

57. I further request that based upon this Affidavit, a Criminal Complaint and arrest warrants be issued for **WILLIAMS and COURTNEY**, charging them with distribution of heroin, a Schedule I controlled substance, and distribution of at least 50 grams of a mixture and substance containing methamphetamine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

58. Finally, I respectfully request that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application, search warrant, arrest warrant, and Criminal Complaint. I believe that sealing these documents is necessary because the items and information to be seized are relevant to an ongoing investigation into criminal activities by the Defendants and their coconspirators. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and search warrants over the internet, and disseminate them to other criminals as they deem appropriate, *i.e.*, post them publicly online. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness, as well as endanger the safety of agents serving the warrant requested.

I swear under penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information and belief.

/s/ Brian Nehring
Brian Nehring, Special Agent
Drug Enforcement Administration

Sworn to and subscribed before
me telephonically on the 2nd day of December 2020

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

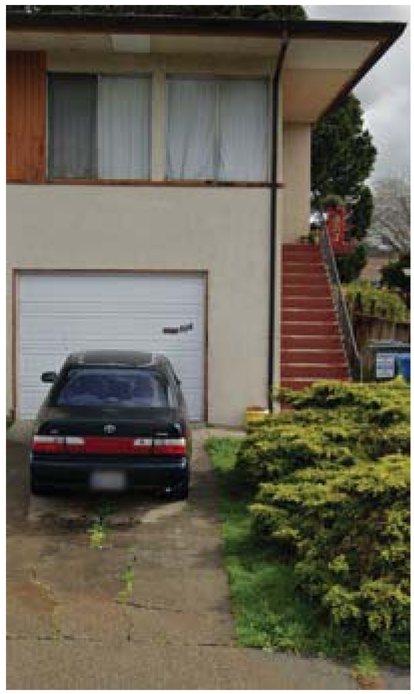
Approved as to form:

Cameron Desmond

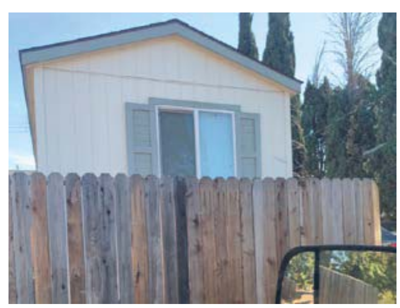
Cameron L. Desmond
Assistant U.S. Attorney

Attachment A
Locations to be Searched

A. The current residence of Clarence COURTNEY located at **806 Sheridan Street, #B, Vallejo, California** (Picture below), further described as a unit on the south (right) side of the duplex, two story, tan in color with, with red steps leading up to the second floor landing and entrance door covered with a black metal security screen, with the letter B affixed to the right of the front door, with a ground level garage with a white door and the numerals 806 in black affixed:



B. The residence located at **229 Contra Costa Street, Vallejo, California** (Picture below), further described as a single family, single story building located in the rear yard of the property, accessed by an fenced gate in the alley way directly behind (west) of Contra Costa Street and behind the front residence at 227 (which also has the numerals 229 affixed in front directly below 227), light tan in color with pale green trim, surrounded by a natural wood fence;



C. The person of **Michael Renay WILLIAMS**;

D. The person of **Clarence COURTNEY**;

E. The T-Mobile cellular telephone with call number **(707) 209-9835** subscribed to and used by COURTNEY;

F. The Metro PCS cellular telephone with call number (**707) 655-6785** currently used by WILLIAMS;

G. **A 2003 Audi Sedan, California License Plate #8PJK556**, black, registered to COURTNEY and used to deliver methamphetamine on 11-18-2020

H. **A 1995 Jeep, California License Plate #6UPD626**, gold, registered to COURTNEY and believed used to facilitate and/or deliver methamphetamine on 09-22-2020;

I. **A 2004 Nissan Maxima, 7RAR028**, silver, used by COURTNEY to deliver methamphetamine on 10-29-2020; and

J. All other vehicles over which any owner, occupant, or resident of the premises has dominion and control, as determined by agent observation of such person operating or accessing the vehicle; DMV records showing ownership or use of the vehicle; witness statements establishing ownership or use of the vehicle; or car keys to operate the vehicle found in the actual or constructive possession of such person

Attachment B
Items to be Seized

Agents are authorized to search and seize property that constitutes evidence, fruits, and instrumentalities of violations of the following federal statutes (the “Target Offenses”), committed by COURTNEY, WILLIAMS, and their co-conspirators:

- Title 21 U.S.C. Sections 846 and 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Heroin and Methamphetamine.

- Title 21 U.S.C. Section 841(a)(1) – Distribution and Possession with Intent to Distribute Heroin and Methamphetamine.

As further described in the Affidavit, the specific evidence, fruits, and instrumentalities of the Target Offenses for which agents may search includes:

1. Controlled substances, including heroin and methamphetamine, or items frequently used to distribute heroin and methamphetamine, or items containing residue from the distribution of heroin and methamphetamine; drug-trafficking paraphernalia, including scales, measuring devices, and weighing devices; narcotics diluting or cutting agents; narcotics packaging materials, including plastic, tin foil, cellophane, jars, plastic bags, and containers; and plastic surgical gloves;

2. United States and foreign currency linked to drug trafficking and/or the proceeds of drug trafficking, including the pre-recorded U.S. currency used to purchase heroin and methamphetamine, from WILLIAMS during in this investigation;

3. Narcotics or money ledgers, narcotics distribution or customer lists, narcotics supplier lists, correspondence, notations, logs, receipts, journals, books, pay and owe sheets, records and other documents noting the price, quantity, date and/or times when narcotics were purchased, possessed, transferred, distributed, sold or concealed;

4. Telephone paging devices, beepers, mobile phones, car phones, answering machines and tapes, and other communication devices which could be used to participate in a conspiracy to distribute controlled substances in violation of 21 U.S.C. § 841(a)(1);

5. Bank account records, wire transfer records, bank statements, safety deposit keys and records, money wrappers, money containers, income tax returns, evidence of financial transfer, or movement of money generated from the sale of narcotics;

6. Personal telephone books, address books and other such address listings, letters, cables, telegrams, telephone bills, photographs, audio and video tapes connected to drug trafficking, personal notes and other items reflecting names, addresses, telephone numbers, communications, and illegal activities of associates in drug trafficking activities;

7. Financial instruments purchased with large amounts of currency derived from the sale of controlled substances, including travelers checks, bonds, stock certificates, cashier's checks and certificates of deposit; money counting machines, money wrappers and bags used to carry controlled substances;

8. Records, documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals, jewelry, or other items obtained with the proceeds from the sale of controlled substances;

9. Records, items, and documents reflecting travel, including airline tickets, credit card receipts, travel vouchers, hotel and restaurant receipts, canceled checks, maps and written directions to location;

10. Handguns, shotguns, rifles, explosives, and other firearms/incendiary devices and ammunition that may be used to facilitate the distribution or possession of, with the intent to distribute controlled substances or discovered in the possession of a prohibited person, including WILLIAMS or COURTNEY;

11. Indicia of occupancy, residency, control or ownership of the premises and things described in this warrant, including utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records; and

12. All names, words, telephone numbers, email addresses, time/date information, messages or other electronic data in the memory of the mobile telephone or on a server and associated with mobile telephones that are associated with WILLIAMS and COURTNEY during execution of the warrant. This authority to search such mobile telephones includes the following within each mobile telephone:

    A. Incoming call history;
    B. Outgoing call history;
    C. Missed call history;
    D. Outgoing text messages;
    E. Incoming text messages;
    F. Draft text messages;
    G. Telephone book;
    H. Data screen or file identifying the telephone number associated with the mobile telephone searched;

I. Data screen, file, or writing containing serial numbers or other information to identify the mobile telephone searched;
J. Voicemail;
K. User-entered messages (such as to-do lists);
L. Photographs; and
M. Any passwords used to access the electronic data described above.