

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

Isaiah Reed

Case No. **8:20MJ1247AAS**

Defendant(s)

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 date(s) of September 19, 2019 in the county of Hillsborough in the
Middle District of Florida, the defendant(s) violated:

Code Section

21 U.S.C. § 846
21 U.S.C. § 841(b)(1)(C)

Offense Description

Conspiracy to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin and fentanyl.

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

Robert Harrop, Detective

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/4/2020



Judge's signature

City and state: Tampa, Florida

Elizabeth A. Jenkins, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Robert Harrop, after being duly sworn, depose and say as follows:

Introduction and Agent Background

1. I am commissioned as a detective with the Hillsborough County Sheriff's Office ("HCSO") and have been so appointed since March 2016. I am presently assigned to the HCSO Special Investigations Division in Hillsborough County. In addition, I am a Task Force Officer ("TFO") for Homeland Security Investigations ("HSI"). My duties as an HCSO Detective/HSI TFO include the investigation of various criminal activities of narcotics traffickers and their associates.

2. This affidavit is being submitted in support of a criminal complaint charging Isaiah Reed ("REED") with conspiracy to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin and fentanyl, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(C).

3. This affidavit does not contain all of the information pertaining to this investigation, and merely provides probable cause to issue a warrant for the defendant's arrest. I have personally participated in this investigation described below and am familiar with the information contained in this affidavit through my personal knowledge and information learned during the course of this investigation.

A. Fatal Overdose of A.P. on September 19, 2019

4. On September 19, 2019, at approximately 12:18 p.m., St. Joseph's Hospital Security Staff contacted the Hillsborough County Sheriff's Office to report a suspicious death.

5. Hospital staff reported a male brought in the decedent (A.P.) who appeared to have deceased from a drug overdose.

6. HCSO patrol deputies responded to St. Joseph's Hospital, located at 4211 Van Dyke Rd, Lutz, Florida and made contact with an individual ("Witness 1"), that brought AP into the hospital.

7. HCSO deputies discovered that Witness 1 had an outstanding warrant and attempted to take Witness 1 into custody, who fled on foot. Deputies apprehended Witness 1 in the parking lot of the hospital. Witness 1 was later charged with Battery on a Law Enforcement Officer and Resisting Arrest with Violence. That case is being prosecuted by the Hillsborough County State Attorney Office under case 2019-CF-013232-D001.

8. HCSO detectives responded to the hospital and conducted an audio-recorded interview with Witness 1. Witness 1 advised he knew A.P. personally and that A.P. spent the previous night at his house. Witness 1 stated he and A.P. had smoked methamphetamines the previous night, but that it was weak. The next morning, September 19, 2019, Witness 1 and A.P. purchased heroin from a black male known to him as "Z."

9. Witness 1 recounted the events that led up to A.P.'s death. Specifically, he stated that he called "Z" at 813-965-#### early in the morning of September 18, 2019. At approximately 10:04 a.m. on September 18, 2019, "Z" arrived at Witness 1's residence, located in Lutz, Florida. Witness 1 and A.P. met "Z" in the driveway and they both purchased two small bags of heroin from "Z." Witness 1 witnessed the transaction between A.P. and "Z." After the drug transaction in the driveway, A.P. went back into the house. Witness 1 entered the vehicle with "Z" and they went to Legacy Coins, located at 1628 Dale Mabry Highway North Lutz, Florida at approximately 10:30 a.m.

10. HCSO detectives later obtained surveillance footage and a pawn ticket receipt from Legacy Coins. The footage from the Legacy Coins, as depicted below, corroborates Witness 1's account and depicts Reed wearing a black T-shirt.



11. After visiting Legacy Coins, Witness 1 stated they went to Citgo gas station, located at 1616 Dale Mabry Hwy N. Lutz, Florida at approximately 11:05

a.m. Witness 1 stated that he (Witness 1) went inside to purchase merchandise, while Reed stayed in the car. HCSO detectives later obtained surveillance footage from the Citgo gas station. The footage captured Witness 1 inside the gas station purchasing merchandise. Reed was parked outside of the view of the exterior cameras.

12. After visiting the Citgo, Witness 1 stated they went to Keke's Breakfast Café, located at 13121 North Dale Mabry Highway, Tampa, Florida, at approximately 11:10 a.m. Both "Z" and Witness 1 purchased "to-go" food. Per Witness 1, "Z" told the waitress to write the name "Zeah" on his food order. Reed's first name is "Isaiah."

13. As depicted on the image below (and on the left), HCSO detectives reviewed video surveillance from Keke's Breakfast Café. The image to the right depicts Reed's most recent booking photo. I believe both images depict the same individual, Isaiah Reed.



14. After visiting Keke's Breakfast Café, "Z" and Witness 1 went back to Witness 1's residence in Lutz, Florida. "Z" dropped Witness 1 off at the driveway and "Z" left the area.

15. Witness 1 entered the residence and tried to enter his room where A.P. was located. Witness 1 noticed that the door was locked and so he looked through the side window and observed A.P. laying on the ground. Witness 1 broke the door and saw that A.P. was unconscious and unresponsive.

16. Witness 1 yelled for the homeowner ("Witness 2") who was home during the incident. Witness 1 told Witness 2 to get the car ready, because Witness 1 needed to bring A.P. to the hospital.

17. Witness 2 drove Witness 1 and A.P. to St. Joseph's North Hospital, located in Lutz Florida. They arrive at the emergency entrance at approximately 11:45 a.m.

18. HCSO detectives interviewed Witness 2. Witness 2 advised that he/she was scared that he/she would get in trouble for having a drug overdose happen at his/her house, so Witness 2 gathered the drugs and paraphernalia, placed it in a Publix bag, and threw it out in his/her garbage can.

19. HCSO detectives recovered the Publix bag from the trash can and located several syringes and small plastic bags. Only one of the six syringes had a needle tip on it. The rest were broken off. The four plastic bags did not have any residue inside of them.

20. HCSO detectives searched Witness 1's room and located two small plastic bags. One of them had a powder residue inside of it. The other bag did not have any residue inside of it.

21. Witness 1 advised he/she "washes out" each bag of heroin he/she uses in order to get high from the residue. Witness 1 advised the only bag that belonged to A.P. would still have residue inside of it. Furthermore, Witness 1 advised the syringe with the tip on it was the one that A.P. used, as Witness 1 disposed of his/hers syringe and heroin bag prior to going to the hospital.

B. Silver Toyota Camry License Plate GKPQ84

22. Law enforcement searched the neighborhood for video surveillance of Reed's vehicle entering or exiting the area. As depicted below, at approximately 10:04 a.m., video surveillance showed a silver Toyota Camry, the same vehicle described by Witness 1, missing a hubcap, driving in and out of the neighborhood. The time is consistent with when Witness 1 stated he was picked up by "Z."



23. On or about September 18, 2019, Witness 1 conducted a controlled phone call with "Z" at phone number 813-965-####. During the call, which was monitored by law enforcement, Witness 1 requested "Z" come back to the house to deliver more heroin. "Z" agreed to come back, but stated it would be a while. During the phone conversation, Witness 1 asked "Z" if the stuff was going to be the same as earlier, and "Z" responded in the affirmative. This was in reference to the heroin/fentanyl "Z" had sold A.P. and Witness 1 earlier.

24. On September 19, 2019, at approximately 12:08 a.m., a silver Toyota Camry pulled into the driveway. At the same time as the car pulled into the driveway, "Z" called from 813-965-#### and advised he just pulled in the driveway. The Camry appeared to be the same one observed in the earlier neighborhood surveillance footage.

25. HCSO detectives attempted to block the vehicle in the driveway and take "Z" into custody, but the vehicle fled through the front yard and out of the neighborhood. The license plate on the vehicle was observed to be GKPQ84.

26. The vehicle was registered to Ronnetta Jeniece Henry ("Henry") with an address in Tampa, Florida. HCSO detectives responded to that address, but were unable to locate anyone.

27. On September 19, 2019, a jail call was made to phone number 813-965-####. That call was made by a Hillsborough County inmate named Jeremiah Joseph Bivens ("Bivens"). During the call, Bivens asked the recipient to bail him (Bivens) out of jail. The recipient, who did not identify himself, stated he was

working on it and would bail him out. According to records, Bivens later secured a bond from I.T. Bail Bonds in Tampa.

28. HCSO detectives obtained the I.T. Bail Bond information for Bivens and learned the person who posted bond wrote a name of "Zell Gainey" with the phone number of 813-965-####. As mentioned earlier, Reed's full name is Isaiah "Gainey" Reed.

29. Approximately four days earlier, on or about September 15, 2019, police officers from the Tampa Police Department ("TPD") conducted a traffic stop at 30th Street North and Hillsborough Avenue East. TPD Officers documented in their report that three individuals were inside that car, including Bivens and Reed.

30. Based on this information, HCSO detectives showed Witness 1 an unmarked photograph of Reed. Witness 1 immediately identified Reed as "Z" and the same person who delivered the substance that A.P. used before his death.

31. On September 19, 2019, HCSO detectives located and interviewed Henry about her vehicle. Henry advised she let a black male named "Z" or "Zeaha" borrow the vehicle. The phone number she had for "Z" or "Zeaha" was 813-965-####.

32. On September 20, 2019, Henry called HCSO detectives and advised she located her vehicle. She said that her vehicle was near Dr. King Boulevard and Florida Avenue, Tampa, Florida. She stated she knew this information because Bond Auto Sales had a GPS device on her vehicle and told her where it was.

33. HCSO detectives responded to that intersection and located the vehicle parked in a parking lot near ACE Cash Express, located at 3921 North Florida Avenue, Tampa, Florida. The vehicle was unoccupied and the engine compartment was not warm. The vehicle appeared to have been cleaned on the inside. HCSO detectives obtained a court authorized state search warrant for the vehicle.

34. HCSO detectives and crime scene investigators searched the vehicle, photographed it, obtained latent prints, and took DNA swabs from the vehicle.



35. Latent prints from the vehicle were matched to HENRY. No prints were identified to Reed. Potential DNA evidence from the vehicle was inconclusive as to a single source contributor.

36. Detectives learned that Henry rented a vehicle at Enterprise Rent-A-Center while her Camry was missing. HCSO detectives responded to Enterprise Rent-A-Car and obtained the rental agreement. Per the rental agreement, Henry rented a 2019 Hyundai Elantra on September 19, 2019, at 4:33 p.m. She paid for the

Rental using a VISA card ending in 2752. The rental agreement number was 73SGQL.

37. Detectives obtained surveillance footage of the Enterprise Rent-A-Car during the time Henry completed the car rental. A light-colored sedan, which resembles the 2004 Toyota Camry, is observed dropping her off and then departing the area. The surveillance footage is poor quality and details of the vehicle cannot be distinguished.

C. Phone Tolls

38. Law enforcement officers Phone tolls were obtained between Reed and Henry. The phone tolls confirmed that before and after the car rental at Enterprise Rent-A-Car, Henry and Reed spoke on the phone.

39. The phone tolls also confirmed that Reed returned to the residence on September 19, 2019, moments before he fled.

40. On September 24, 2019, detectives authored a trap and trace for Reed's phone. Subscriber information received showed that the phone was registered to "Nasir King" on the T-Mobile network. The phone had a T-Mobile address as the subscriber's address. The data received from T-Mobile showed the phone to be an Apple iPhone 6S in rose gold color.

41. On September 26, 2019, Detectives noted that Reed's phone was pinging near the Edgecomb Courthouse in Tampa. I learned that Reed had a hearing on an unrelated court case on that day.

42. Detectives responded to the courthouse and observed Reed in and out of the courtroom. Detectives observed Reed using a dark blue flip phone and a rose gold iPhone.

43. Detectives called Reed at phone number 813-965-####. At the same time of the phone call, detectives observed Reed pull a rose gold iPhone out of his pocket, look at it, and then decline the call. The phone tolls obtained from his phone corroborate this phone call. As depicted below, law enforcement officers later obtained video surveillance from the courthouse depicting Reed holding his rose gold iPhone in his right hand.



44. On October 31, 2019, Hillsborough County Medical Examiner (“MEO”) Doctor Julia Pearson analyzed the syringe and bag located at the incident scene. She determined the syringe and bag residue were a mixture of Tramadol, Morphine, 6-Monoacetylmorphine, Heroin (Diacetylmorphine) and Fentanyl.

45. On November 11, 2019, Reed had another court hearing on an unrelated case. After he appeared in court, Reed was arrested for state distribution of controlled substances charges that are related to the facts giving rise to this complaint. At the time of his arrest, Reed was not in possession of the rose gold iPhone 6S.

46. On January 3, 2020, Associate Medical Examiner Carolina McEnnan concluded that A.P. suffered an accidental death caused by the combined effects of fentanyl, methamphetamine and heroin.

47. Based upon the information contained in this affidavit, I believe there is probable cause to believe that Reed knowingly distributed heroin to A.P. resulting in A.P.'s death.



Robert Harrop, Detective
Hillsborough County Sheriff's Office
Task Force Officer with Homeland Security
Investigations

Sworn to and subscribed before me on this 4th day of March, 2020.



Elizabeth A. Jenkins
United States Magistrate Judge

Reminder!

**Please be sure to file a Notice of Appearance immediately
upon receipt of the Complaint Court Number**

This will ensure that future ECF notices will be received