

FILED
6/26/2023

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TERRANCE SANDERS

aka "Rock," "Rocklord," and "Lord";

SHAVELLE SIMS

aka "Four" and "Shavez";

TYRON PAULK

aka "Lil T," "Boogie," "Boobie," and
"Buddy";

SAMUEL LOPEZ

aka "Tall Four";

DEMECCO TARTT

aka "Mecco";

TARANACE BANKS

aka "Ugg";

DEANDRE MADDOX

aka "Dread" and "Dre";

DELAWARENCE ISON

aka "Binny" and "Q";

LAVELL GRIFFIN

aka "Vell";

BRIAN WILLIAMS

aka "Lil Bri" and "Lil Brian";

RAHEEM SMITH

aka "Skeem" and "Gotti";

PARTGANAN BURCH

aka "Tang" and "Partagnan"; and

DEMORRIS HILL

CASE NUMBER: 23-cr-00372

UNDER SEAL

CRIMINAL COMPLAINT

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

Count One

Beginning no later than in or about May 2022, and continuing to present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants, TERRANCE SANDERS, SHAVELLE SIMS, TYRON PAULK, SAMUEL LOPEZ, DEMECCO TARTT, TARANCE BANKS, DEANDRE

MADDOX, DELAWRENCE ISON, LAVELL GRIFFIN, BRIAN WILLIAMS, and RAHEEM SMITH, violated:

Code Section

Title 21, United States Code, Section 846

Offense Description

conspiring to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1)

Count Two

On or about March 9, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant, TYRON PAULK, violated:

Code Section

Title 18, United States Code, Section 924(c)(1)(A)(i)

Offense Description

knowingly possessing a firearm, namely, a loaded Glock 43x 9mm pistol bearing serial number BWCB012, with an extended magazine, and a loaded Ruger LCP II 9mm pistol bearing serial number 380800857, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint

Count Three

On or about April 1, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant, PARTAGNAN BURCH, violated:

Code Section

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

Offense Description

knowingly possessing with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance

Count Four

On or about June 4, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant, TERRANCE SANDERS, violated:

Code Section

Title 18, United States Code, Section 924(c)(1)(A)(iii)

Offense Description

knowingly using, carrying, and discharging a firearm in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint

Count Five

On or about June 5, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant, TERRANCE SANDERS, violated:

Code Section

Title 18, United States Code, Section 924(c)(1)(A)(i)

Offense Description

knowingly possessing a firearm, namely, a model FN 509 9 millimeter pistol, bearing serial number GKS0224379, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl

(N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint

Count Six

On or about June 6, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant, RAHEEM SMITH, violated:

Code Section

Title 18, United States Code, Section 924(c)(1)(A)(i)

Offense Description

knowingly possessing a firearm, namely, a loaded model FN 509 9 millimeter pistol, bearing serial number GKS0224379, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint

Count Seven

On or about June 16, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant, DEMORRIS HILL, violated:

Code Section

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

Offense Description

knowingly possessing with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance

This criminal complaint is based upon these facts:

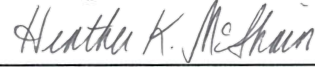
X Continued on the attached sheet.



CHUNG KIM
Special Agent, Homeland Security Investigations
(HSI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: June 26, 2023



Judge's signature

City and state: Chicago, Illinois

HEATHER K. MCSHAIN, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CHUNG KIM, being duly sworn, state as follows:

PRELIMINARY MATTERS

1. I am a Special Agent with the Homeland Security Investigations (HSI), and have been so employed for approximately four years. I am currently assigned to the Gangs and Violent Crimes Task Force Unit, and my responsibilities include the investigation of narcotics trafficking offenses. As part of my duties as an HSI Special Agent, I investigate narcotics trafficking offenses, including violations of the federal controlled substance laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, and 846, and Title 18, United States Code, Sections 922 and 924.

2. I have received specialized training in the means and methods by which individuals and drug trafficking organizations conduct their illegal drug trafficking activities. I have also participated in multiple investigations involving illegal drug trafficking by drug trafficking organizations. As such, I am familiar with the various methods used by drug traffickers and their organizations to transport, store, and distribute narcotics and narcotics proceeds. I have participated in investigations involving various drug types, including heroin, fentanyl, 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. Based upon my experience and training, I am familiar with the ways in which drug traffickers conduct their unlawful drug trafficking activity, including, but not limited to, their use of code words and numbers to conduct their transactions, their methods for concealing narcotics and narcotics proceeds, and their use of violence and threats of violence to protect their organization.

3. This affidavit is submitted in support of a multi-count criminal complaint that charges as follows:

a. Beginning no later than in or about May 2022 and continuing to present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendants, TERRANCE SANDERS (also known as “Rocklord,” “Rock,” and “Lord”), SHAVELLE SIMS (also known as “Four” and “Shavez”), TYRON PAULK (also known as “Lil T,” “Boogie,” “Boobie,” and “Buddy”), SAMUEL LOPEZ (also known as “Tall Four”); DEMECCO TARTT (also known as “Mecco”), TARANCE BANKS (also known as “Ugg”), DEANDRE MADDOX (also known as “Dre” and “Dread”), DELAWRENCE ISON (also known as “Binny” and “Q”), LAVELL GRIFFIN (also known as “Vell”), BRIAN WILLIAMS (also known as “Lil Bri” and “Lil Brian”), and RAHEEM SMITH (also known as “Skeem” and “Gotti”), did conspire to knowingly and intentionally possess with intent to distribute and distribute, a controlled substance, namely, 400 grams or more of a mixture and substance

containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance; 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1), all in violation of 21 U.S.C. § 846.

b. On or about March 9, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant TYRON PAULK did knowingly possess a firearm, namely, a loaded Glock 43x 9mm pistol bearing serial number BWCB012, with an extended magazine, and a loaded Ruger LCP II 9mm pistol bearing serial number 380800857, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

c. On or about April 1, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant PARTANGAN BURCH (also known as “Tang” and “Partagnan”) did knowingly possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

d. On or about June 4, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant TERRANCE SANDERS did knowingly use, carry, and discharge a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

e. On or about June 5, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant TERRANCE SANDERS did knowingly possess a firearm, namely, a model FN 509 9 millimeter pistol, bearing

serial number GKS0224379, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

f. On or about June 6, 2023, at Chicago, in the Norther District of Illinois, Eastern Division, and elsewhere, defendant RAHEEM SMITH did knowingly possess a firearm, namely, a loaded model FN 509 9 millimeter pistol, bearing serial number GKS0224379, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount

of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

g. On or about June 16, 2023, at Chicago, in the Norther District of Illinois, Eastern Division, and elsewhere, defendant DEMORRIS HILL did knowingly possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

4. The information in this affidavit is based on my participation in this investigation, information provided by other local and federal law enforcement officers (“LEOs”), physical surveillance, controlled purchases of narcotics, search warrants, tracking device warrants, review of consensually recorded conversations and conversations intercepted pursuant to court orders authorizing the interception of wire communications, law enforcement reports, laboratory reports, criminal history records, information obtained from members of the drug trafficking organization, witnesses and other persons with knowledge of relevant facts, my training and experience, and the training and experience of other law enforcement officers with whom I have consulted. Because this affidavit is being submitted for the limited purpose of establishing probable cause for this complaint, I have not included each and every fact known to me concerning this investigation.

I. OVERVIEW OF THE CONSPIRACY & SUBSTANTIVE COUNTS

5. As detailed herein, based on the wiretap investigation conducted by law enforcement, beginning no later than in or about May 2022, and continuing until the present, members of the Traveling Vice Lords street gang (TVLs), led by TERRANCE SANDERS, have operated a narcotics distribution organization (the SANDERS DTO) that operated an open-air drug market near the intersection on the 3400 block of West Chicago Avenue and the 800 block of North Trumbull Avenue on the west side of Chicago (“the Chicago and Trumbull drug spot” or “the drug spot”). SANDERS and others used a grey GMC van and a red Audi hatchback as temporary stash locations to store narcotics for resale prior to distributing them on to various street-level narcotics sellers (“pack workers”) at the Chicago and Trumbull drug spot. The two vehicles were continuously parked in the lot behind a cell phone store located on the 3300 West Chicago Avenue (“the Cell Phone Store”). Additionally, SANDERS and others used a stash house located at 1637 North Karlov Avenue to mix, cut, prepare and package narcotics for delivery to the drug spot. When the drug spot needed to be resupplied, SANDERS and others delivered the narcotics from 1637 North Karlov Avenue to the GMC van and the red Audi and others would then deliver the narcotics to the drug spot and/or stash locations located closer to the drug spot, including the basement of 903 North Trumbull, where they were then sold in user or dealer quantities to customers of the SANDERS DTO. When sold in user or dealer quantities, the narcotics were often packaged in a consistent manner, namely, smaller zip lock baggies bound with white tape containing narcotics. The SANDERS

DTO used the term “pack” to refer to a group of 12 to 15 smaller Ziplock baggies bounded together with white tape and the term “bundle” to refer to a group of eight packs. Thus, a “bundle” would typically contain approximately 120 smaller Ziplock baggies. After the narcotics sales, portions of the narcotics proceeds were turned over to SANDERS. SIMS, PAULK, and others delivered narcotics to the drug spot. SIMS also supervised the collection of narcotics proceeds from the Chicago and Trumbull drug spot, met with SANDERS and narcotics suppliers, and resupplied the Chicago and Trumbull drug spot. Additionally, SIMS was responsible for arranging the supplies of crack cocaine for resale at the Chicago and Trumbull drug spot, which were supplied by BURCH. The Chicago and Trumbull drug spot was managed by SANDERS, SIMS, PAULK, WILLIAMS, and ISON, while TARTT, LOPEZ, MADDOX, BANKS, GRIFFIN, SMITH and others sold the SANDERS DTO’s narcotics to customers at the drug spot.

6. Additionally, on or about April 1, 2023, as discussed in paragraphs 155-176 below and charged in Count Three of the Complaint, BURCH possessed with intent to distribute approximately 15 grams of a mixture and substance containing cocaine, which law enforcement seized from BURCH’s person as he attempted to drop off cocaine and pick up cash in the red Audi parked behind the Cell Phone Store. On or about June 16, 2023, as discussed in paragraphs 93-99 below and charged in Count Seven of the Complaint, DEMORRIS HILL possessed with intent to distribute a quantity of a mixture and substance that field tested positive for heroin and a quantity of a mixture and substance that field tested positive for heroin and fentanyl,

which law enforcement recovered from a sewage drain after HILL attempted to discard it after being approached while attempting to make a delivery to SANDERS. Additionally, in furtherance of the above-described drug conspiracy, PAULK, SANDERS and SMITH each possessed, used, carried, and/or discharged firearms. *See* ¶¶ 54-60 (PAULK possession of two firearms on or about March 9, 2023, as charged in Count Two of the Complaint), ¶¶ 78-84 (SANDERS discharge of a firearm on or about June 4, 2023, as charged in Count Four of the Complaint); ¶¶ 85-92 (SANDERS and SMITH possession of a firearm on or about June 5, 2023 and June 6, 2023, respectively, as charged in Count 5 and Count 6 of the Complaint).

II. OVERVIEW OF INDIVIDUAL ROLES IN THE CONSPIRACY

7. Based upon intercepted communications, surveillance, and other investigative activity, and as set forth in more detail below, the co-conspirators are as follows:

8. TERRANCE SANDERS directed operations of the SANDERS DTO, including by supervising the drug spot, directing individuals who were employed at the drug spot, controlling the supply of narcotics to the drug spot, delivering narcotics, and collecting proceeds from the drug spot. *See passim*.

9. SHAVELLE SIMS was a street manager for the Chicago and Trumbull drug spot, who was responsible for coordinating the supply of crack cocaine for resale at the drug spot and controls the street-level sales of narcotics at the drug spot. *See* ¶¶ 26-27, 34-39, 50-51, 80-81, 100-119, 136-188, 207-215, 221-222.

10. TYRON PAULK was a shift manager for the Chicago and Trumbull drug spot and sold narcotics at the drug spot. *See ¶¶ 30-33, 44-49, 52-60, 120-135, 203-206.*

11. SAMUEL LOPEZ sold narcotics for the SANDERS DTO at the Chicago and Trumbull drug spot. LOPEZ also communicated with narcotics customers on his cellular phone, received orders for narcotics and contacts SIMS and other known and unknown co-conspirators to meet with the customers and conducted the transactions. *See ¶¶ 141-143, 185-188, 207-215, 221-222.*

12. DELAWRENCE ISON was a manufacturer and packager of narcotics for the Chicago and Trumbull drug spot, who met with SANDERS and others to obtain narcotics supplies. ISON also sold narcotics at the drug spot. *See ¶¶ 74-77, 120-135, 216-220.*

13. BRIAN WILLIAMS was a street level dealer of narcotics (“pack worker”) for the SANDERS DTO at the Chicago and Trumbull drug spot. *See ¶¶ 74-75, 120-135.*

14. RAHEEM SMITH was a street level dealer who sold narcotics for the SANDERS DTO. *See ¶¶ 40-43, 61-73, 85-92, 105-110, 132, 201-202.*

15. DEMECCO TARTT was a street level dealer who sold narcotics for the SANDERS DTO at the Chicago and Trumbull drug spot. *See ¶¶ 50-51, 85-92, 101-104, 155, 202.*

16. DEANDRE MADDOX was a street level dealer who sold narcotics for the SANDERS DTO at the Chicago and Trumbull drug spot. *See ¶¶ 28-29, 40-43, 54-73, 189-200.*

17. LAVELL GRIFFIN was a street level dealer who sold narcotics for the SANDERS DTO at the Chicago and Trumbull drug spot. *See ¶¶ 26-27, 189-200.*

18. TARANCE BANKS was a street level dealer who sold narcotics for the SANDERS DTO at the Chicago and Trumbull drug spot. *See ¶¶ 26-27, 111-114, 201.*

III. THE SANDERS DTO COORDINATED DRUG TRAFFICKING THROUGH THE USE OF CELLULAR TELEPHONES

19. As set forth in more detail below, SANDERS and other co-conspirators coordinated the operation of the SANDERS DTO using cellular telephones to discuss the operation of the drug spot, including staffing, narcotics supply, the collection of narcotics proceeds, and efforts to avoid law enforcement. The investigation included court-authorized interceptions of communications over various cellular telephones used by the following individuals:¹

Target Phone	Phone Number	Primary User	Date Order Authorized	Interception Period
Target Phone 1	(XXX)XXX-6553	SHAVELLE SIMS	December 27, 2022 February 8, 2023 March 10, 2023	12/27/22 to 1/25/23 2/9/23 to 3/10/23 3/10/23 to 3/29/23
Target Phone 2	(XXX)XXX-8226	DEANDRE MADDOX	December 27, 2022 February 8, 2023	12/27/22 to 1/25/23 2/9/23 to 3/10/23
Target Phone 3	(XXX)XXX-1127	TYRON PAULK	February 8, 2023	2/9/23 to 3/10/2023
Target Phone 4	(XXX)XXX-0940	TERRANCE SANDERS	March 10, 2023	3/10/23 to 4/8/23
Target Phone 5	(XXX)XXX-4668	SHAVELLE SIMS	March 10, 2023 May 8, 2023	3/10/23 to 4/8/23 5/9/23 to 6/6/23
Target Phone 6	(XXX)XXX-1020	SHAVELLE SIMS	May 8, 2023	5/9/23 to 6/6/23

¹ The Chief Judge or Acting Chief Judge of the Northern District of Illinois issued authorizations for 30-day interception periods for each of the below-described Target Phones.

Target Phone 7	(XXX)XXX-8426	TERRANCE SANDERS	May 8, 2023	5/9/23 to 5/17/2023
Target Phone 8	(XXX)XXX-2999	TERRANCE SANDERS	June 2, 2023	6/3/23 to Present

IV. PURCHASES OF CONTROLLED SUBSTANCES FROM THE SANDERS DTO

20. Based on surveillance, pack workers at the Chicago and Trumbull drug spot conducted hand-to-hand transactions daily.

21. Between May 2022 and May 2023, undercover officers and confidential sources made controlled purchases² of narcotics from the Chicago and Trumbull drug spot operated by the SANDERS DTO. In total, LEOs made controlled purchases of an approximate gross weight of 2.34 kilograms of suspected heroin containing fentanyl from the Chicago and Trumbull drug spot. The suspected heroin containing fentanyl purchased at the spots was typically packaged in smaller Ziplock baggies and sold for \$10 per baggie with discounts given for higher quantity sales. LEOs purchased suspected heroin from various members of the DTO, including but not limited to:

² A “controlled purchase,” as discussed in this affidavit, refers to a purchase of narcotics from a subject during which an undercover agent was equipped with a recording device and/or a confidential source was monitored via video recording. Both the undercover agent and confidential sources were given agency-provided funds, surveilled to the purchase, surveilled conducting the purchase, and surveilled as he/she returned to meet with law enforcement agents following the purchase. At that meeting, the CS or UC provided the purchased narcotics and excess funds, if any, to law enforcement. When the individual conducting the purchase was a confidential source, that source was searched for money and contraband prior to and following the purchase. All suspected narcotics were sent to a lab for testing and analysis. For purposes of this affidavit, where analysis has been completed, the narcotics are referred to as “heroin” or “cocaine”; where analysis is pending, the type of narcotics are described as suspected narcotics, based on my training and experience and the training and experience of others with whom I have consulted.

- a. An approximate gross weight of 373.3 grams of suspected heroin containing fentanyl from SIMS at the Chicago and Trumbull drug spot and at other locations away from the drug spot.
- b. An approximate gross weight of 190 grams of suspected heroin containing fentanyl from LOPEZ at the Chicago and Trumbull drug spot and at other locations away from the drug spot.
- c. An approximate gross weight of 405.9 grams of suspected heroin containing fentanyl from PAULK at the Chicago and Trumbull drug spot.
- d. An approximate gross weight of 29.1 grams of suspected heroin containing fentanyl from TARTT at the Chicago and Trumbull drug spot.
- e. An approximate gross weight of 175.09 grams of suspected heroin containing fentanyl from SMITH at the Chicago and Trumbull drug spot.
- f. An approximate gross weight of 67.1 grams of suspected heroin containing fentanyl from MADDOX at the Chicago and Trumbull drug spot.
- g. An approximate gross weight of 4.1 grams of suspected heroin containing fentanyl from GRIFFIN at the Chicago and Trumbull drug spot.
- h. An approximate gross weight of 9 grams of suspected heroin containing fentanyl from BANKS at the Chicago and Trumbull drug spot.
- i. An approximate gross weight of 207.2 grams of suspected heroin containing fentanyl from ISON at the Chicago and Trumbull drug spot and at other locations away from the drug spot.

V. SEIZURES OF CONTROLLED SUBSTANCES AND FIREARMS FROM THE SANDERS DTO

22. During the investigation, law enforcement officers made multiple seizures of narcotics, including the following:

a. On or about January 25, 2023, LEOs seized approximately 15 zip lock bags containing suspected heroin after observing GRIFFIN conceal a supply of narcotics for resale inside a fence pole near the drug spot. LEOs later intercepted a call where GRIFFIN explained to MADDOX where he placed the narcotics. *See ¶¶ 193-199.*

b. On or about January 27, 2023, LEOs seized approximately six zip lock bags containing suspected heroin after observing GRIFFIN engage in a hand-to-hand narcotics transaction with an unidentified narcotics customer. *See ¶ 200.*

c. On or about March 9, 2023, LEOs seized two firearms, approximately 121 zip lock bags containing suspected heroin and fentanyl, and approximately nine small zip lock bags containing suspected crack cocaine that PAULK delivered to a stash location near the Chicago and Trumbull drug spot, after retrieving narcotics supplies from the temporary stash locations inside the red Audi and GMC van, both parked behind the Cell Phone Store. *See ¶¶ 54-60.*

d. On or about March 14, 2023, LEOs seized approximately 118 zip lock bag containing suspected heroin and fentanyl and approximately five grams of crack cocaine from a stash location near the Chicago and Trumbull drug spot after SANDERS and WILLIAMS delivered narcotics supplies to PAULK. LEOs searched

the vacant residence located at 903 North Trumbull Avenue, used by PAULK as a narcotics stash location. *See* ¶¶ 120-135.

e. On or about April 1, 2023, LEOs seized narcotics from PARTAGNAN BURCH, after BURCH coordinated the delivery of narcotics to SIMS. LEOs conducted a traffic stop on the vehicle driven by BURCH as he arrived at the parking lot behind the Cell Phone Store. During a pat down, LEOs seized approximately 56 small zip lock bags containing a total of approximately 15 grams of crack cocaine. *See* ¶¶ 155-176.

f. On or about June 6, 2023, LEOs seized one firearm from RAHEEM SMITH after LEOs observed SMITH in possession of a firearm. LEOs conducted an investigative stop on SMITH after he exited a CTA train platform. During a pat down, LEOs seized a FN 509 9mm pistol and placed SMITH into custody. *See* ¶¶ 85-92.

VI. FACTS IN SUPPORT OF PROBABLE CAUSE

A. SANDERS Supervised the SANDERS DTO's Drug Trafficking

23. From May 2022 through the present, TERRANCE SANDERS directed the SANDERS DTO, overseeing narcotics sales at the Chicago and Trumbull drug spot. SANDERS also coordinated the deliveries of narcotics to supply the drug spot and collected narcotics proceeds from individuals working at the drug spot.

1. TERRANCE SANDERS Supervised Drug Trafficking Activities While in Jail.

24. On or about May 30, 2022, TERRANCE SANDERS was arrested for aggravated battery of a police officer near the Chicago and Trumbull drug spot.

According to CPD's arrest report, SANDERS attacked a CPD officer in an attempt to interfere with the arrest of Individual B.B., who was armed with a handgun. SANDERS was held in custody at the Illinois Department of Corrections until he was released on or about September 1, 2022. During his time in custody, law enforcement monitored outgoing jail calls placed by SANDERS starting from on or about June 15, 2022, to approximately August 31, 2022.

25. Based on SANDERS' jail calls and surveillance, law enforcement determined that SANDERS continued to be involved in the drug trafficking operation at the Chicago and Trumbull drug spot. For example, on or about July 8, 2022, at approximately 9:35 a.m. (call session #75), SANDERS placed an outgoing call from IDOC to an unidentified female (UF-1), who was using telephone number (708) 378-0484. During the conversation, SANDERS stated, "Tell 'Shavelle' [SHAVELLE SIMS], I said man, all that, all that old bread [money] from that [narcotics]...just tell him I said, all that old bread. Put all that old bread to the side, bro. And only start on...keep count of the new joint [batch of narcotics] that 'dude' just gave him."³ UF-1 replied, "Ok." SANDERS repeated, "Keep count of the new joint dude just gave him."

³ To the extent that recorded communications (including text messages) are summarized in this Affidavit, those summaries do not include references to all of the topics covered during the course of the conversation that was recorded. In addition, the summaries do not include references to all statements made by the speakers on the topics that are described. All quotations from recorded conversations are based upon preliminary transcriptions of those conversations and/or from your affiant or other law enforcement having personally listened to the recordings. The times listed for the recorded conversations are approximate. At various points in the Affidavit, I included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on the contents and context of the recorded conversation, my knowledge of the investigation, my experience and training, and the experience and training of other law enforcement in this investigation.

Based on the conversation described above, my knowledge of the investigation and my training and experience, I believe SANDERS directed UF-1 to instruct SIMS to set aside narcotics proceeds from a previous supply of narcotics and to maintain accountability of a new batch of narcotics that were provided by an unidentified supplier.

2. On or about December 28, 2022, SHAVELLE SIMS Used Target Phone 1 to Ask TERRANCE SANDERS Who Was Present at the Chicago and Trumbull Drug Spot

26. On or about December 28, 2022, at approximately 10:18 a.m. (call session #11), SIMS placed an outgoing call on Target Phone 1⁴ to SANDERS, who was using Target Phone 4.⁵ During the conversation, SIMS stated, “My bad. This

⁴ Law enforcement identified SIMS as the user of Target Phone 1 based on the following: on or about December 19, 2022, at approximately 11:23 a.m., using a POD camera, a LEO observed SIMS standing near the intersection on West Chicago Avenue and North Trumbull Avenue. At that time, the LEO monitoring the POD camera placed an outgoing call to Target Phone 1 and observed as SIMS appeared to retrieve a cell phone from the right-side pocket of his jacket and speak into the cell phone. During the conversation, according to the LEO, SIMS answered, “Hello.” The LEO then disconnected the call and observed SIMS lower the phone from his face.

Law enforcement has further identified SIMS as the user of Target Phone 1 based on the following: On or about January 11, 2023, at approximately 10:20 a.m. (call session # 316), SIMS received an incoming call on Target Phone 1 from Individual D, who was using telephone number (773) 895-9472. During the conversation, Individual D asked, “[W]here you at? In the car [the red Audi hatchback parked in the rear lot behind the Cell Phone Store]?” SIMS replied, “I’m right here. . . Turning the corner.” At about the same time of the phone call described above, using a pole camera, LEOs observed a black Volkswagen sedan arrive and park in the parking lot behind the Cell Phone Store. Moments later, LEOs observed SIMS exit the driver’s seat of the Volkswagen and enter the passenger seat of the red Audi hatchback. Shortly after, SIMS exited the red Audi and returned to the driver’s seat of the black Volkswagen and departed the parking lot. About two minute later, at approximately 10:22 a.m., using a pole camera, LEOs observed the black Volkswagen arrive near the Chicago and Trumbull drug spot. At that time, Individual D approached the driver’s side of the Volkswagen on foot and SIMS handed Individual D an unknown object. Individual D then walked out of camera view.

⁵ Law enforcement identified SANDERS as the user of Target Phone 4 based on the following: On or about December 4, 2022, at approximately 12:54 p.m., using a City of Chicago Police Observation Device (“POD”) camera, law enforcement observed SANDERS standing near the intersection on West Chicago Avenue and North Trumbull Avenue. At that time, a law enforcement officer (“LEO”) placed an outgoing call to Target Phone 4 and observed as SANDERS appeared to look at the screen of a cell phone in his possession. SANDERS appeared to manipulate the cell phone screen with his finger and the call was disconnected. LEOs then observed SANDERS place the cell phone in the left-side pocket

damn phone was on silent.” SANDERS replied with an unintelligible statement. SIMS stated, “I’m on my way...um...I’m on my way. Who out there [at the Chicago and Trumbull drug spot]? I’m a grab ‘Tall Four’ [SAMUEL LOPEZ] ass from his crib man. So his ass could stand outside [at the Chicago and Trumbull drug spot] with me.” SANDERS stated, “Ummm...‘Boogie,’ ‘Vell,’ [LAVELL GRIFFIN] and your boy uh, ‘Ugg’ [TARANCE BANKS].” SIMS replied, “Aight yeah I’m grabbing him though. Make his ass stand outside with me.” SANDERS stated, “Aight.”

27. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe SIMS informed SANDERS that he was en route to the Chicago and Trumbull drug spot and would pick up LOPEZ to accompany him [SIMS] at the drug spot. Later in the conversation, SANDERS informed SIMS that three individuals known as Boogie, Vell, and Ugg, were standing outside at the Chicago and Trumbull drug spot during the time of the conversation described above.

of his jacket. Moments later, the LEO placed a second outgoing call to Target Phone 4 and observed on POD camera as SANDERS retrieved a cellphone from the left-side pocket of his jacket and manipulate the cell phone screen with his finger. The LEO observed that the call was once again disconnected. In addition, as discussed below, on or about February 10, 2023, SANDERS used Target Phone 4 to arrange to meet with PAULK to resupply a van on or about February 10, 2023, at approximately 7:27 a.m. At approximately 7:33 a.m., about six minutes after SANDERS said he was “pulling up” to meet PAULK by the van, LEOs using a pole camera observed SANDERS meet with PAULK in the rear lot of the Cell Phone Store and then observed SANDERS briefly enter the gray van parked in the lot

3. On or about January 14, 2023, TERRANCE SANDERS Discussed DEANDRE MADDOX's Narcotics Supply and Threatened to Fire DEANDRE MADDOX from the Drug Spot.

28. On or about January 14, 2023, at approximately 8:43 a.m. (call session # 2900), MADDOX received an incoming call on Target Phone 2⁶ from SANDERS, who was using Target Phone 4. During the conversation, SANDERS asked, "What [how much narcotics] you got left?" MADDOX replied, "Uhh, I got a pack and a half [of heroin]..." SANDERS stated, "You better get your ass back. Or your ass ain't working [selling narcotics at the drug spot] no more." MADDOX stated, "I am coming back [to the drug spot]. I been coming back every day." SANDERS replied, "Well I ain't seen your ass..." MADDOX stated, "I'm coming back, 'Rock' [SANDERS]."

29. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SANDERS contacted MADDOX to verify the status of MADDOX's narcotics supply. Further, I believe

⁶ LEOs identified MADDOX as the user of Target Phone 2 based on the following: on or about October 25, 2022, a confidential source ("CS-3"), posing as a narcotics customer, purchased approximately ten zip lock bags containing suspected heroin in exchange for \$100. CS-3 began cooperating in this investigation on or about June 16, 2022, and has numerous arrests and two convictions, including a felony conviction for narcotics possession. The information provided by CS-3 was corroborated and proved reliable by other cooperating witnesses, physical surveillance, telephone records, and other publicly available records. Later on or about October 25, 2022, at approximately 4:13 p.m., while using a POD camera to observe MADDOX (identified based on comparison to his previous arrest photograph) standing on the northwest corner of the intersection at West Chicago Avenue and North Trumbull Avenue, a LEO placed an outgoing call to Target Phone 2 and observed on POD camera as MADDOX appeared to retrieve a cell phone from the right side pocket of his jacket, speak into the device as one would placing the cell phone on speaker as the person using Target Phone 2 said, "Hello", and then look at his cell phone screen and lower the cell phone from his face after the LEO ended the call. In addition, MADDOX used Target Phone 2 to arrange sales of suspected heroin to CS-3 on or about October 26, 2022, and on or about October 31, 2022. Law enforcement conducting surveillance of those transactions and CS-3 confirmed that MADDOX was the person who met with CS-3 during both transactions arranged through Target Phone 2.

SANDERS threatened to fire MADDOX from selling narcotics at the Chicago and Trumbull drug spot if he did not return.

4. On or about February 10, 2023, TERRANCE SANDERS Coordinated with TYRON PAULK to Resupply the Narcotics at the Chicago and Trumbull Drug Spot.

30. On or about February 10, 2023, at approximately 7:27 a.m., (call session #279), TYRON PAULK received an incoming call on Target Phone 3⁷ from SANDERS, who was using Target Phone 4. During the conversation, SANDERS stated, “Yo. Meet me by the van.” PAULK replied, “Aight.” SANDERS asked, “You heard me?” PAULK stated, “Meet you by the van?” SANDERS stated, “Huh?” PAULK stated, “You said meet you by the van?” SANDERS stated, “Yeah, I’m pulling up.” PAULK stated, “Aight, I’m walking out right now.” SANDERS stated, “Aight.” SIMS received an incoming call on Target Phone 1 from SANDERS, who was using Target Phone 4.

31. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe SANDERS instructed

⁷ Law enforcement identified TYRON PAULK as the user of Target Phone 3 based on the following: On or about June 9, 2022, at approximately 12:30 p.m., a confidential source (CS-2) purchased approximately 2.4 grams of suspected heroin from PAULK in exchange for \$110 at approximately 901 North Trumbull Avenue in Chicago. CS-2 began cooperating in this investigation on or about June 9, 2022, and has numerous arrests and multiple convictions, including multiple felony convictions for retail theft. The information provided by CS-2 was corroborated and proved reliable by other cooperating witnesses, physical surveillance, telephone records, and other publicly available records. PAULK, who CS-2 identified based on comparison to a previous arrest photograph presented by law enforcement, provided CS-2 with the phone number (224) 384-1127 (Target Phone 3) in order to facilitate future narcotics transactions. On or about June 15, 2022, at approximately 2:40 p.m., using a City of Chicago Police Observation Device (POD) camera, LEOs observed PAULK, identified by LEOs based on a comparison to a previous arrest photograph in the CPD Data Warehouse system, at approximately 802 North Trumbull Avenue. At that time, a LEO placed an outgoing call to Target Phone 3, believed to be used by PAULK. The LEO who placed the call observed PAULK answer a cell phone in his possession. The LEO and PAULK engaged in a brief conversation. Shortly afterwards the phone call was disconnected.

PAULK to meet him at the gray GMC van parked behind the Cell Phone Store. Based on the investigation to date, I believe that the van is used as another stash location for narcotics intended for resale at the Chicago and Trumbull drug spot.

32. At approximately 7:33 a.m., using a pole camera, LEOs observed PAULK and SANDERS meet in the rear lot of the Cell Phone Store at which point SANDERS entered the van.⁸ While SANDERS was inside the van, PAULK entered the passenger's seat of SANDERS vehicle. After a brief moment, SANDERS exited the van, entered the driver's seat of his vehicle, and SANDERS and PAULK departed the area in the same vehicle.

33. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe SANDERS obtained a portion of narcotics from the GMC van to resupply the Chicago and Trumbull drug spot. Additionally, I believe that SANDERS was managing the supply of narcotics used for resale at the Chicago and Trumbull drug spot.

5. On or about February 13, 2023, TERRANCE SANDERS Coordinated with SHAVELLE SIMS to Resupply the Narcotics at the Chicago and Trumbull Drug Spot.

34. On or about February 13, 2023, at approximately 9:59 a.m., (call session #663), SIMS received an incoming call on Target Phone 1 from SANDERS, who was using Target Phone 4. During the conversation, SANDERS asked, "Need me to drop something [narcotics] off?" SIMS replied, "Yeah." SANDERS asked, "How many jabs

⁸ Law enforcement identified both PAULK and SANDERS based on comparison to their previous arrest photographs in the Chicago Police Department Data Warehouse system.

[packs of heroin]?” SIMS stated, “Uh... 16 [packs].” SANDERS stated, “Alright.” SIMS stated, “Aight.”

35. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe SANDERS contacted SIMS to ask how much heroin was needed to resupply the Chicago and Trumbull drug spot. SIMS informed SANDERS that SIMS needed 16 packs of heroin.

36. On that same day, at approximately 11:57 a.m. (call session #667), SIMS placed an outgoing call on Target Phone 1 to SANDERS, who was using Target Phone 4. During the conversation, SIMS asked, “Mmm yeah... Where you put it [the narcotics referenced in call session #663] at?” SANDERS responded, “It’s in the van [the gray GMC van parked in the rear lot behind the Cell Phone Store]. The slot up there.” SIMS asked, “It’s open?” SANDERS stated, “Yeah.” SIMS replied, “Aight.”

37. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe SIMS asked SANDERS where SANDERS dropped off the resupply of narcotics for the Chicago and Trumbull drug spot discussed in call session #663 (16 packs of heroin). SANDERS informed SIMS that SANDERS stored the narcotics in the GMC van parked behind the Cell Phone Store and told SIMS where SANDERS placed the narcotics inside the van. SANDERS then confirmed the van was open so SIMS could retrieve the narcotics.

38. At approximately 11:59 a.m., using a pole camera, LEOs observed SIMS, driving a black Volkswagen sedan (“Subject Vehicle 2”), arrive in the rear lot of the

Cell Phone Store and enter the rear passenger seat of the gray GMC van. Approximately one minute later, SIMS exited the GMC van and entered the front passenger seat of the red Audi parked in the same lot and then enter the rear passenger seat of the red Audi. SIMS then exited the red Audi, returned to the driver's seat of Subject Vehicle 2 and drove to the 800 block of North Trumbull Avenue.

39. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe SIMS moved a portion of the narcotics from the GMC van that was supplied by SANDERS to the red Audi to resupply the Chicago and Trumbull drug spot.

6. On or about February 13, 2023, RAHEEM SMITH Coordinated the Resupply of Narcotics with SANDERS For the Chicago and Trumbull Drug Spot.

40. On or about February 13, 2023, at approximately 5:38 p.m. (call session #670), Target Phone 1 received an incoming call from SANDERS, who was using Target Phone 4. Based on voice comparison and previous intercepted calls, LEOs believe the phone was being used by SMITH at this time.⁹ During the conversation, SMITH stated, "Hello?" SANDERS asked, "You put something [narcotics] in the car [the red Audi hatchback parked in the rear lot behind the Cell Phone Store]?" SMITH

⁹ LEOs identified RAHEEM SMITH as the user of Target Phone 1 on this date based on voice comparison with previous intercepted calls. Additionally, on or about February 15, 2023 Target Phone 1 placed an outgoing call to UM-7920, who was using (773) 412-7920 (call session 680), during the conversation SMITH stated, using Target Phone 1, "This Skeem [RAHEEM SMITH], I got the phone." Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe UM-7920 intended to contact SIMS on Target Phone 1. However, it appears SMITH, who identified himself as 'Skeem,' answered the call and informed UM-7920 that he had Target Phone 1 in his possession.

stated, "Hello?" SANDERS asked, "You some [narcotics] in here?" SMITH stated, "Hello?" SANDERS asked, "Where... where that shit [narcotics] at?" SMITH stated, "Um... under the sun... the sunroof. No. By the windshield... the windshield." SANDERS stated, "Mhm." SMITH asked, "You got it [the narcotics]?" SANDERS stated, "Yeah. How the fuck you put that [the narcotics]... Where the fuck 'Shavelle' [SIMS] go?" SMITH asked, "Shavez [SIMS]? Where he go?" SANDERS stated "Yeah." SMITH stated, "He went out of town." SANDERS stated, "Ah. [Unintelligible]." SMITH asked, "He ain't tell you?" SANDERS stated, "Hell nah. [Unintelligible]." SMITH stated, "Aight."

41. Based on the intercepted conversation described above, my knowledge of the investigation and my training and experience, I believe SANDERS using Target Phone 4 contacted Target Phone 1 to ask SIMS about the resupply of narcotics that was stored in the red Audi parked behind the Cell Phone Store. SMITH, who answered Target Phone 1, then directed SANDERS to the location inside the red Audi where the supply of narcotics was concealed. I further believe SMITH informed SANDERS that SIMS was "out of town." Based on subsequent intercepted calls over Target Phone 1, I believe SMITH continued to use Target Phone 1 through on or about February 20, 2023, when SIMS resumed using Target Phone 1.

42. At approximately the same time as the intercepted call described above, using a pole camera, LEOs observed SANDERS enter the driver's seat and then the passenger's seat of the red Audi. A brief moment later, SANDERS exited the red

Audi and handed an unknown item to DEANDRE MADDOX. MADDOX then departed the area.

43. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe SANDERS retrieved a supply of narcotics from the red Audi to resupply the Chicago and Trumbull drug spot.

7. On or about February 16, 2023, TERRANCE SANDERS Coordinated the Resupply of Narcotics for the Chicago and Trumbull Drug Spot.

44. On or about February 16, 2023, at approximately 1:53 p.m. (call session #1181), PAULK received an incoming call on Target Phone 3 from SANDERS, who was using Target Phone 4. During the conversation, PAULK answered, "Hello?" SANDERS stated, "[Unintelligible], you by your car?" PAULK stated, "Yeah." SANDERS replied, "Aight, we pulling up, we coming off Grand... right now." PAULK stated, "Aight, I'm right here." SANDERS stated, "Be on point, boy. [Unintelligible] front." PAULK stated, "I'm in the front."

45. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS instructed PAULK to meet him near the 900 block of North Trumbull Avenue so SANDERS could deliver a resupply of narcotics for PAULK.

46. During the intercepted call, using a pole camera, LEOs observed PAULK standing in front of approximately 901 North Trumbull Avenue speaking on the phone. Approximately one minute later, LEOs observed a silver Buick arrive in

the front of approximately 901 North Trumbull Avenue and the driver of the vehicle (believed to be SANDERS) hand PAULK a large item through the driver's side door. PAULK retrieved the large item and walked into a gangway on the 900 block of North Trumbull. The silver Buick then departed the area. Based on the sequence and the call described above, I believe that SANDERS used Target Phone 4 to coordinate the resupply of narcotics for the Chicago and Trumbull drug spot. Further, while law enforcement was not able to observe the driver of the silver Buick, I believe that SANDERS was the driver of the silver Buick, based on the intercepted call described above.

8. On or about February 16, 2023, TERRANCE SANDERS Coordinated the Resupply of Narcotics for the Chicago and Trumbull Drug Spot with TYRON PAULK.

47. On or about February 16, 2023, at approximately 1:53 p.m. (call session #1181), PAULK received an incoming call on Target Phone 3 from SANDERS, who was using Target Phone 4. During the conversation, PAULK answered, "Hello?" SANDERS stated, "[Unintelligible], you by your car?" PAULK stated, "Yeah." SANDERS replied, "Aight, we pulling up, we coming off Grand... right now." PAULK stated, "Aight, I'm right here." SANDERS stated, "Be on point, boy. [Unintelligible] front." PAULK stated, "I'm in the front."

48. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS instructed PAULK to meet him near the 900 block of North Trumbull Avenue so SANDERS could deliver a resupply of narcotics for PAULK.

49. During the intercepted call, using a pole camera, LEOs observed PAULK standing in front of approximately 901 North Trumbull Avenue speaking on the phone. Approximately one minute later, LEOs observed a silver Buick arrive in the front of approximately 901 North Trumbull and the driver of the vehicle (believed to be SANDERS) hand PAULK a large item through the driver's side door. PAULK retrieved the large item and walked into a gangway on the 900 block of North Trumbull. The silver Buick then departed the area. Based on surveillance and the call described above, I believe that SANDERS used Target Phone 4 to coordinate the resupply of narcotics for the Chicago and Trumbull drug spot. Further, while law enforcement was not able to observe the driver of the silver Buick, I believe that SANDERS was the driver of the silver Buick, based on the intercepted call described above.

9. On or about February 26, 2023, SHAVELLE SIMS and TERRANCE SANDERS Discussed DEMECCO TARTT's Work Status at the Chicago and Trumbull Drug Spot.

50. On or about February 26, 2023, at approximately 12:32 p.m. (call session #868), SIMS received an incoming call on Target Phone 1 from SANDERS, who was using telephone number Target Phone 4. During the conversation, SANDERS asked, "You talk to Mecco [DEMECCO TARTT]?" SIMS stated, "No. What happened [unintelligible]. What the fuck he do?" SANDERS asked, "How much he owe you?" SIMS stated, "A hunnid [\$100]." SANDERS stated, "Ight, if he ain't got that money, he ain't working [selling narcotics at the Chicago and Trumbull drug spot]." SIMS asked, "What the fuck he do now?" SANDERS stated, "His ass was on

St. Louis shooting dice and shit last night. Then... then he shut his motherfucking phone off.” SIMS stated, “Goofy ass. I ain’t talk to his ass. He only owe me a hunnid [\$100] though.” SANDERS stated, “Aight.”

51. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS asked SIMS how much money TARTT owed him. SIMS replied that TARTT owed him \$100 in proceeds generated at the Chicago and Trumbull drug spot. SANDERS replied that if TARTT failed to pay the amount of money owed to SIMS, then TARTT would no longer be allowed to sell narcotics at the Chicago and Trumbull drug spot.

10. On or about February 26, 2023, TERRANCE SANDERS Discussed with TYRON PAULK the Supply of Narcotics at the Drug Spot.

52. On or about February 26, 2023, at approximately 1:07 p.m. (call session #2720), PAULK received an incoming call on Target Phone 3 from SANDERS, who was using Target Phone 4. During the conversation, SANDERS stated, “You strap [provide supplies of narcotics] them [pack workers]?” PAULK stated, “Hello?” SANDERS stated, “Did you strap them?” PAULK stated, “Huh?” SANDERS stated, “Did you strap them?” PAULK stated, “You say strap them?” SANDERS stated, “Yeah, they done [selling narcotics].” PAULK stated, “Okay, hey ‘Willie’ [an unidentified pack-worker] told me eight [narcotics] so, oh aight I’m finna give him this last one [narcotics] I got.”

53. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS instructed

PAULK to resupply the pack-workers at the Chicago and Trumbull drug spot with additional narcotics for resale. PAULK informed SANDERS that he would distribute his last supply of narcotics to the pack-workers for the drug spot.

11. On or about March 9, 2023, Law Enforcement Seized Firearms and Narcotics Supplies Delivered by TERRANCE SANDERS to TYRON PAULK.

54. On or about March 9, 2023, at approximately 11:33 a.m., using a pole camera, LEOs observed SANDERS and PAULK enter the rear lot of the Cell Phone Store. SANDERS entered the rear door on the driver's side of the GMC Van that was parked in the same lot. At about the same time, PAULK entered the front passenger seat of the same GMC van. A few minutes later, at approximately 11:35 a.m., SANDERS exited the GMC van and entered the front passenger side of the red Audi that was also parked in the rear lot of the Cell Phone Store. A few moments later, SANDERS exited the red Audi and reentered the rear door on the driver's side of the GMC van. At approximately 11:37 a.m., LEOs observed both SANDERS and PAULK exit the GMC van and depart the rear lot of the Cell Phone Store. LEOs maintained surveillance on PAULK utilizing a combination of pole and POD cameras and observed PAULK enter the rear entrance of the abandoned basement of 903 North Trumbull Avenue.

55. Based on the surveillance described above, my knowledge of the investigation and my training and experience, I believe SANDERS resupplied PAULK with narcotics used for resale at the Chicago and Trumbull drug spot.

Further, I believe PAULK then delivered the supply of narcotics which he received from SANDERS to the abandoned basement of 903 North Trumbull Avenue.¹⁰

56. Later that day, at approximately 12:18 p.m., LEOs arrived at the rear abandoned basement unit of 903 North Trumbull Avenue and began to search the premises. While searching the abandoned basement of 903 North Trumbull Avenue, LEOs recovered: one (1) loaded Glock 43x 9mm pistol bearing serial number BWCB012 with an extended magazine, one (1) loaded Ruger LCP II 9mm pistol bearing serial number 380800857, approximately 120 zip lock bags containing approximately 169 grams of suspected heroin, approximately nine small zip lock bags containing approximately 1.8 grams of suspected crack cocaine, and one (1) loose zip lock bag containing approximately 0.2 grams of suspected heroin.¹¹

¹⁰ Law enforcement's determination that 903 North Trumbull was abandoned as of March 9, 2023 is based on the following: (1) based on law enforcement surveillance of the property from on or about February 10, 2023 through March 9, 2023, the only individuals accessing the property appeared to be members of the DTO or customers of the DTO, who would congregate in the gangway or backyard areas but would not actually enter the property for extended periods; (2) during multiple law enforcement visits to the premises between February 10, 2023 and March 9, 2023, nobody on the property responded to law enforcement's attempts to contact residents of the property through knocks on the door and verbal calls to the inside the residence; (3) according to ComEd records, although electricity service was activated for the property under the name of Individual J.S. in January 2023, no bills had been paid for the period from January 2023 to April 2023; (4) according to IDOC records, Individual J.S. was incarcerated in IDOC custody from February 2023 to April 2023; (5) according to law enforcement databases, Individual J.S.'s address since May 2023 has been a single-family residence in Pingree Grove, Illinois; (6) according to Cook County Assessor records, the taxpayer listed for the property is a Individual R.P.; and (7) according to law enforcement databases, Individual R.P. died on June 21, 2017.

¹¹ The suspected heroin and suspected crack cocaine was subsequently turned over the Customs and Border Protection Laboratory for testing and analysis. Of the 120 zip lock bags containing suspected heroin, the contents of five zip lock bags were tested and tested positive for heroin and fentanyl. The contents of the one loose zip lock bag containing suspected heroin tested positive for heroin and fentanyl. The nine small zip lock bags containing suspected crack cocaine tested positive for cocaine base.

57. On the same date, at approximately 1:43 p.m., LEOs monitoring a pole camera, observed PAULK enter the rear abandoned basement of 903 North Trumbull Avenue.

58. On the same date, at approximately 1:44 p.m. (call session #5926), PAULK placed an outgoing call on Target Phone 3 to MADDOX, who was using (872) 258-8226 ("Target Phone 2"). During the conversation, PAULK stated, "Hey, you move the straps [firearms from the abandoned basement of 903 North Trumbull Avenue]?" MADDOX stated, "Uhh, uhh." PAULK stated, "Yeah, 'Joe,' my guns gone." MADDOX stated, "Nah, I haven't even been down there [the abandoned basement of 903 North Trumbull Avenue]." PAULK stated, "On Neal, they gone." MADDOX stated, "Crazy!" PAULK stated, "The police just found them bitches." MADDOX asked, "They just did?" PAULK stated, "Yeah, man." MADDOX stated, "They [the police] probably seen all them hypes [narcotics users] down there [in the basement of 903 North Trumbull Avenue]." PAULK stated, "They just bumped [seized] my straps [firearms]." They got the blows [heroin] and everything!" MADDOX stated, "Damn!" PAULK stated, "On Neal!" MADDOX stated, "Umm, I didn't even, umm, cause you told me that you didn't even have nothing, I just called Bro [TERRANCE SANDERS]." PAULK stated, "Nah, I just got some [narcotics] from him [TERRANCE SANDERS] today." MADDOX stated, "I haven't been back there none today." PAULK stated, "On King Neal, they tore this bitch up." MADDOX stated, "That's Crazy!" MADDOX stated to an unidentified person in the background, "Here I come Kiya." PAULK stated, "Yeah, they got that shit." MADDOX asked, "Damn! Blue

and whites [marked police vehicles]?” PAULK stated, “Hell nah! [Unintelligible].” MADDOX stated, “Don’t pee on yourself.” PAULK stated, “They got my guns.” MADDOX to an unidentified individual in the background, “Hold on bae.” MADDOX stated, “I should of grabbed that motherfucker this morning. I started to.” PAULK stated, “On god, my shit gone.” MADDOX stated, “Get the fuck from down there.” PAULK stated, “They got them bitches. They got both the guns.” MADDOX stated, “Get the fuck from right there.” MADDOX to an unidentified individual in the background, “I didn’t give her shit.” MADDOX stated, “Let me call you back, bro.” PAULK stated, “Alright.”

59. Shortly after the call, at approximately 1:48 p.m., using a pole camera, LEOs observed PAULK exit the rear abandoned basement of 903 North Trumbull Avenue.

60. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe PAULK told MADDOX that the stash of narcotics he received from SANDERS and stored in the rear abandoned basement unit of 903 North Trumbull Avenue was taken by the police. Additionally, PAULK told MADDOX that the guns he stored in the basement were also found and recovered by the police.

12. March 16, 2023 – The SANDERS DTO Conducted a Free Pass Out of a New Supply of Narcotics That Were Manufactured and Packaged at 1637 North Karlov Avenue

61. On or about March 13, 2023, at approximately 6:55 a.m. (call session 20252), SANDERS placed an outgoing call on Target Phone 4 to MADDOX, who was

using Target Phone 2. During the conversation, MADDOX stated, “Yo.” SANDERS stated, “Pass out [a free sample distributed to narcotics customers]. Thursday. Six o’clock.” MADDOX stated, “Pass out [a free sample distributed to narcotics customers] another one going to be Thursday six o’clock it’s over with though, Unc.” SANDERS stated, “Tell em to go with it Thursday six o’clock, they gotta shop for it.” MADDOX stated, “Another one at Thursday six o’clock.” SANDERS stated, “They missed it.” MADDOX stated, “Aight.” SANDERS stated, “I don’t give a fuck who it is, they missed it.” MADDOX stated, “Aight.” SANDERS stated, “Where’d you get that from, out of where, the two packs [quantity of narcotics]?” MADDOX stated, “Uh... out the vent [in the basement of 903 North Trumbull Avenue], the one he just showed me yesterday.”

62. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS informed MADDOX that the next pass out [a free sample distributed to narcotics customers] would be at a later date. Furthermore, SANDERS asked MADDOX where he retrieved his supply of narcotics from. Additionally, based on the investigation to date, I believe that MADDOX informed SANDERS the stash of narcotics was retrieved from the vent located in the vacant basement at approximately 903 North Trumbull Avenue in Chicago, Illinois.¹²

¹² Based on intercepted calls, surveillance, and controlled purchases, law enforcement has observed members of the Chicago and Trumbull drug spot, including TYRON PAULK, enter the basement located at 903 North Trumbull Avenue before a suspected narcotics transaction, and after a suspected narcotics delivery from SANDERS.

63. On or about March 14, 2023, at approximately 9:46 a.m. (call session #20379), SANDERS placed an outgoing call on Target Phone 4 to SIMS, who was using Target Phone 1. During the conversation, SIMS stated, “Yo.” SANDERS stated, “Hey bro listen... if a motherfucka, if a motherfucka...” SIMS asked, “You say what?” SANDERS stated, “I say, I say, If a motherfucker don’t get this shit [new supply of narcotics] together before the summer hit, motherfucker’s gonna lose.” SIMS stated, “Ya, I’m already knowing, shit we need some more bodies [pack workers] bro, shit it be like five or six motherfuckers up here in the undercover hours, and it’s going to be two.” SANDERS stated, “Ya, that’s what I’m trying to do this right so I can come back out. Little Brian pulled up didn’t he?” SIMS stated, “Ya, that shit ain’t gonna last long, we need some more bodies out here man, can’t do nothing without no bodies.” SANDERS stated, “Ya, where your little cousin at?” SIMS stated, “Let me call his ass.” SANDERS stated, “Ya, he thinks they can come stand and hang and people going on.” SIMS stated, “Ya, let me call his ass.”

64. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS and SIMS discussed the narcotics trafficking operation and the staffing level at the Chicago and Trumbull drug spot. Specifically, I believe SANDERS informed SIMS that if the new supply of narcotics were not prepared for distribution, the Chicago and Trumbull drug spot would not be prepared for the influx of narcotics customers during the summer. SIMS told SANDERS that more pack workers [sellers of narcotics] would be needed

to work different hours in order to meet the increased demand from narcotics customers.

65. On the following day, on or about March 15, 2023, at approximately 12:57 p.m. (call session #20693), SANDERS placed an outgoing call on Target Phone 4 to an unidentified male (“UM-0433”), who was using (773) 469-0433. During the conversation, UM-0433 stated, “What up, pimp?” SANDERS asked, “Why this shit [the narcotics] wet?” UM-0433 stated, “Hey man, that’s how they gave it [the narcotics] to me man. That shit is... that shit is green light [good to go] though. That’s... it’s... it’s gonna do what it do.” SANDERS stated, “Aight.” UM-0433 stated, “Yeah, that’s how they gave it [the narcotics] to me though.” SANDERS stated, “Yeah. Aight, I just left that shit. I left out of the crib. I didn’t even wanna. I thought I’d let the shit dry out or some shit.” UM-0433 stated, “Nah. It’s good. It’s good. It ain’t gonna be... you know, when you put it together. It ain’t gonna be...” SANDERS stated, “Yeah, yeah, yeah, yeah... bricks.” UM-0433 stated, “Yeah, yeah. Yeah, it’s good though.” SANDERS stated, “Aight.” UM-0433 stated, “Ok.”

66. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS asked UM-0433 why the supply of narcotics received was wet. UM-0433 advised SANDERS that the narcotics were wet when he received them and UM-0433 gave the narcotics to SANDERS in that same condition. Furthermore, UM-0433 informed SANDERS that the supply of narcotics was good quality and just needed to be manufactured for resale from the narcotics’ pure form.

67. Later that same week, on or about March 16, 2023, at approximately 5:07 a.m., LEOs observed Target Phone 4's location, based on GPS location data, in the vicinity of the suspected stash house located at 1637 North Karlov Avenue.¹³ At approximately 5:58 a.m. (call session #20744), SANDERS received an incoming call on telephone number (872) 305-0940 ("Target Phone 4"), from RAHEEM SMITH, who was using (773) 202-6226 ("Subject Phone 1").¹⁴ During the conversation, SANDERS asked, "Yeah, where you at?" SMITH replied, "Uh....what's this? Passing Fulton. About to be by the uh liquor store." SANDERS stated, "Just tell him to let you out right there. I'm right here." SMITH stated, "Aight, bet." SANDERS stated, "Meet you at by the lot. I'm sitting right here with my hazards on." SMITH asked, "By um...by the liquor store?" SANDERS replied, "Yeah." Later, SANDERS asked, "What you on the bus?" SMITH replied, "Nah, I'm in a Uber."

68. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS called Smith to arrange to pick up SMITH and drive him to the Chicago and Trumbull drug spot.

¹³ Based on intercepted calls, surveillance, and controlled purchases of narcotics, law enforcement determined that the multi-unit residential building located at 1637 North Karlov Avenue in Chicago, Illinois is used by SANDERS as a location to store and package narcotics prior to distributing the narcotics at the Chicago and Trumbull drug spot.

¹⁴ Law enforcement identified RAHEEM SMITH as the user of Subject Phone 1 based on the following: On or about June 3, 2022, at approximately 11:55 a.m., using a City of Chicago Police Observation Device (POD) camera, LEOs observed RAHEEM SMITH near the intersection of West Chicago Avenue and North Trumbull Avenue. At that time, a LEO placed an outgoing call to Subject Phone 1, believed to be used by RAHEEM SMITH. The LEO who placed the call observed RAHEEM SMITH answer a cell phone in his possession. The LEO and RAHEEM SMITH engaged in a brief conversation. Shortly afterwards, at approximately 11:56 a.m., the phone call was disconnected and LEOs observed RAHEEM SMITH return the cell phone to his right pants pocket.

69. At approximately 6:03 a.m., using a City of Chicago Police Observation Device (“POD”) camera, LEOs observed SANDERS and SMITH arrive in a 2018 silver Chevrolet Malibu bearing Illinois license plate number CC84624 (“Subject Vehicle 3”)¹⁵ and park on the 800 block of North Trumbull Avenue. Moments later, SANDERS exited the driver’s seat, SMITH exited the passenger’s seat, and both individuals walked northbound towards the Chicago and Trumbull drug spot.

70. Law enforcement coordinated a plan to send an undercover officer (UC-5) to the pass out being conducted at the Chicago and Trumbull drug spot. At approximately 6:07 a.m., UC-5, who was equipped with a video-only recording device that does not record audio, approached the Chicago and Trumbull drug spot on foot. According to UC-5 and law enforcement’s review of UC-5’s video recording device footage, an unidentified male, who was standing on the corner of West Chicago Avenue and North Trumbull Avenue, instructed UC-5 to walk to middle of the 800 block of North Trumbull Avenue. UC-5 walked northbound on North Trumbull Avenue and was approached by a group of unidentified males. According to UC-5 and law enforcement’s review of UC-5 video footage, RAHEEM SMITH,¹⁶ who was standing within the group of unidentified males, approached UC-5 and handed UC-5 one clear zip lock bag containing suspected heroin. According to UC-5, Smith did not ask for any money in exchange for the suspected heroin. Following the pass out, UC-

¹⁵ Based on research conducted on law enforcement databases, Subject Vehicle 3 is registered to Individual K.B. at an address on the 300 block of South Washtenaw Avenue in Chicago.

¹⁶ UC-5 and other law enforcement officers identified SMITH based on comparison to his previous arrest photograph in the Chicago Police Department Data Warehouse system.

5 departed the area to a safe location away from the Chicago and Trumbull drug spot. The one clear zip lock bag containing suspected heroin weighed less than one gram (including packaging), field-tested positive for heroin and fentanyl, and was later submitted to the Illinois State Lab for testing and analysis. The contents of the one clear zip lock were tested and tested positive for heroin and fentanyl and weighed approximately 0.4 grams in total.

71. Based on the sequence of events described above, my knowledge of the investigation and my training and experience, I believe that SANDERS obtained a new supply of narcotics from UM-0433 and decided to test the quality of the narcotics by distributing free samples of the narcotics to potential customers, also known as a “pass out” on March 16, 2023. I further believe that on the morning of March 16, 2023, SANDERS retrieved narcotics supplies from the suspected stash house located at 1637 North Karlov Avenue and provided narcotics to Smith inside Subject Vehicle 3 for SMITH to participate in conducting the pass out to potential customers, including UC-5.

72. At approximately 6:23 a.m. (call session #20746), SANDERS placed an outgoing call on Target Phone 4 to PAULK, who was using telephone number Target Phone 3. During the conversation, SANDERS asked, “What you give uh ‘Dre’ [Maddox]?” PAULK replied, “I ain’t uh...I aint give him shit. I just told him where it was at. I got like um...” SANDERS asked, “What you got left?” PAULK stated, “I got like shit like five or four.” SANDERS stated, “I’m finna give Skeem [SMITH] five. I’m

finna give Skeem five to put up for you. He gonna, he gonna, I'm passing out with him, but he gonna need five." PAULK replied, "Aight."

73. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SANDERS asked PAULK if he gave any narcotics supplies to MADDOX. PAULK informed SANDERS that he did not, but informed MADDOX of the location where the narcotics were stored. Additionally, PAULK informed SANDERS that he had an unknown amount of unspecified narcotics in his possession. Further, I believe SANDERS stated that he would provide SMITH (also known as "Skeem") with an additional amount of unspecified narcotics to sell because SMITH was running low on narcotics supplies after passing out the share of narcotics SANDERS provided him earlier that morning to potential customers, including UC-5.

13. On or About March 22, 2023, TERRANCE SANDERS Instructed BRIAN WILLIAMS to Deliver Dormin to DELAWRENCE ISON.

74. On March 22, 2023, at approximately 10:28 a.m. (call session #21421), SANDERS placed an outgoing call on Target Phone 4 to BRIAN WILLIAMS, who was using (773) 577-3856.¹⁷ During the conversation, SANDERS stated, "[Unintelligible], 'Binny' [DELAWARENCE ISON] at the crib." WILLIAMS stated, "Yeah, I got em

¹⁷ Law enforcement identified WILLIAMS as the user of the phone number 773-577-3856 based on the following: on or about September 12, 2022, at approximately 12:30 p.m., using a POD camera, LEOs observed BRIAN WILLIAMS standing on the northwest corner of the intersection on West Chicago Avenue and North Trumbull Avenue. At that time, a LEO placed a ruse call to telephone number (773) 577-3856 and observed on POD camera as WILLIAMS appeared to retrieve a cell phone from his jacket pocket and place it towards his ear. After a brief conversation, the LEO ended the phone call and at that time, LEOs observed WILLIAMS lower the cell phone from his ear.

already, we out here at the uh... gas station on Sac [Sacramento].” SANDERS stated, “Yeah, just drop em off.” WILLIAMS stated, “Aight.” SANDERS stated, “[Unintelligible] wait on em. [Unintelligible].” WILLIAMS stated, “We was still... we still up here at the uh... gas station.” SANDERS stated, “Yeah, nah I was just telling him [ISON] but them Dorms [the Dormin] down right quick [prepare to be used in the process of manufacturing narcotics].” WILLIAMS replied, “Aight.”

75. Based on law enforcement surveillance, my training and experience, and on the training and experience of other law enforcement officers with whom I have spoken, I believe that during the communications described above, SANDERS instructed WILLIAMS to drop off the Dormin to ISON (in reference to call session 21418 described above). Furthermore, SANDERS told WILLIAMS that he instructed ISON to prepare the Dormin to be used in the process of manufacturing narcotics for resale.

14. On or about March 28, 2023, TERRANCE SANDERS Directed DELAWRENCE ISON to Prepare a Batch of Narcotics.

76. On or about March 28, 2023, at approximately 7:20 p.m. (call session #22401) SANDERS placed an outgoing call on Target Phone 4 to ISON, who was using Subject Phone 19.¹⁸ During the conversation, ISON stated, “Don’t forget to

¹⁸ Law enforcement identified DELAWRENCE ISON as the user of Subject Phone 19 based on the following: on or about February 4, 2023, at approximately 1:43 p.m., using a City of POD camera, law enforcement officers (“LEOs”) observed an unidentified male [who was later identified as DELAWRENCE ISON] wearing a red coat standing at approximately 117 South Homan Avenue. At that time, a LEO placed an outgoing phone call to Subject Phone 19. LEOs observed on POD camera as ISON retrieve a cell phone on his person and answer the call. After a brief conversation, the LEO disconnected the call, and LEOs observed ISON lower the cell phone from his ear.

leave me two [narcotics] somewhere.” SANDERS stated, “Yeah, you already owe me 400 [\$400], boy.” ISON stated, “Oh you owe me, boy.” SANDERS stated, “Put that [narcotics] together with what he gave you.” ISON asked, “You say what?” SANDERS stated, “Put it together.” ISON stated, “Motherfucker... why I got to put it together.” SANDERS stated, “Try to get uh... try to get like eleven [quantity of narcotics].” ISON asked, “Why the fuck I got to put it together though?” SANDERS stated, “That was your shit [supply of narcotics], you know... put that shit together.” ISON stated, “I already told... alright man, I guess, I guess.”

77. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS directed ISON to package a batch of narcotics for resale. Furthermore, SANDERS informed ISON to attempt to prepare “eleven” of an unidentified quantity of unknown narcotics for resale.

15. On or About June 4, 2023, TERRANCE SANDERS Fired Multiple Gun Shots at a Vehicle to Protect the Drug Operation.

78. On the morning of June 4, 2023, LEOs reviewed POD camera footages in the vicinity of the Chicago and Trumbull drug spot and observed that at approximately 1:55 a.m., on that same morning, a group of individuals standing near the intersection of West Chicago Avenue and North Trumbull Avenue suddenly dispersed and a gray Buick SUV double parked on the northeast corner of the intersection began driving southbound on North Trumbull Avenue. Seconds later, LEOs observed SANDERS standing on the northwest corner of the intersection

holding a gun in his right hand and fire multiple rounds towards the gray Buick SUV. SANDERS then entered the driver's seat of a gray Dodge Durango with a red hood ("Subject Vehicle 6") parked on the sidewalk on the northeast corner of West Chicago Avenue and North Trumbull Avenue and departed the area.¹⁹

79. Law enforcement learned that Chicago Police officers from CPD's 11th District headquarters responded to the area and determined that there were no casualties or injuries as a result of the incident and did not find any shell casings indicative of a shooting. CPD Officers departed the scene with no further developments or leads.

80. On or about June 4, 2023, at approximately 9:06 a.m. (call session #3701), SANDERS received an incoming call on Target Phone 8 from SIMS, who was using (773) 241-1020 ("Target Phone 6").²⁰ During the conversation, SANDERS stated, "I'm on my way that way. I got something in the car. Yea, alright." SIMS replied, "Hey, look bro...You see what I was saying last night? You ain't answer the

¹⁹ Due to the angle of the POD camera, law enforcement was not able to observe the license plate number on Subject Vehicle 6 on the evening of June 4, 2023. Law enforcement, however, has also observed SANDERS driving Subject Vehicle 6 (a gray Dodge Durango with a distinctive red hood) on multiple occasions, including, on or about June 5, 2023 (discussed further in paragraph 97 below) and on or about June 19, 2023. During those other occasions, law enforcement was able to observe that Subject Vehicle 6 bears an Illinois license plate with number CS40271. According to law enforcement databases, Subject Vehicle 6 is registered to SANDERS at the 0-100 block of S. Mason Avenue in Chicago.

²⁰ Law enforcement identified SHAVELLE SIMS as the user of Target Phone 6 based the following: on or about March 20, 2023, at approximately 9:19 a.m., using a POD camera, LEOs observed SHAVELLE SIMS standing in the alley located south of West Chicago Avenue between North St. Louis Avenue and North Trumbull Avenue. At that time, a LEO placed a ruse call to Target Phone 6. The LEO observed on POD camera and SHAVELLE SIMS appeared to answer a cell phone in his possession. During the conversation, the LEO asked if he could speak with "Trey." SHAVELLE SIMS replied, "Who?" The LEO then disconnected the call and observed SHAVELLE SIMS as he looked at his phone and manipulate the screen. At that time, the LEO received an incoming call from Target Phone 6. The LEO did not answer the call.

phone for me no more bro.” SANDERS stated, “I was, god dammit, I was when we left from the storage.” SIMS stated, “Yeah, look through bro. I ain’t look, we not finna let you do none of that shit bro. On some real shit, we ain't trying to hear shit. Well I ain't, I ain't tryna let you do none of that shit. On my kids...ain't nobody got time for that shit, bro. All they ass, they just gonna sit around. They don't give no fuck. They don't give no fuck. I ain't trying to let you go no motherfucking way. That's what I'm trying to tell you. Bro, on my kids. That shit over with. We ain't doing that shit this summer bro.” SIMS later stated, “Yeah, I know that too though. I know that but it's just like...we ain't got time for that shit...like we ain't got we...we slow as hell, Lord. We ain't doing nothing. You gone, like you just, like you said last night, if you gone, they are really trying to run us over. They really not, but they...every motherfucker gonna get ahead of us.” SANDERS replied, “Yeah.” SIMS stated, “Come on. You the body, lord. On my mama, you the ‘head’ [leader]. We the ‘body’ [workers]. If they lock the fucking head out there, we...we out with, shit. Ain't nobody got time for that shit. That's why I ain't been letting you do no tweaking shit at all bro.” Later in the conversation, SANDERS stated, “I think I was in the gangway pissing and when I came back around as soon as I God dammit came from around the building the shots go off ya feel me. You was gone, were you gone?” SIMS replied, “I was right there I was sitting right there on my car when the shots rang out I was sitting there on my car. As soon the shots ran off I ran towards I ain’t want to duck off so I ran to the van and I was Boobie hit the lock, hit the lock.” SANDERS stated, “Yeah, yeah, right, so when I spin off from taking a piss I hear the licks [gunshots] going off like they are

coming from the block [the direction of the drug spot]. So I spin up, so shit the first come to the top of the corner I think that's the active shooter you see what I saying, it probably was one of their cars a rental or some shit I don't know, but shit I just know I get off in it. I let the whole lick [rounds of ammunition] off on that bitch [gun]. Then I see the car going across the street but I'm still throwing [shooting] that way cause I see the car like you feel me? But the lick still going off and I guess buddy with the draco [type of gun] was still throwing too though you get what I saying? 'Buddy' was throwing at the car cause that was the first car you feel me?" SIMS stated, "That was the first car motherfuckers locked eyes on." SANDERS stated, "Yeah, and then they were I guess they did go across the street and that's I am telling them y'all tweaking all them motherfucking shell casings and 'Nuk' was trying to pick them motherfuckers up or whatever and what not then I grabbed all them shell casings and threw them bitches you feel me."

81. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS and SANDERS discussed a shooting incident involving SANDERS. SIMS stated that SANDERS should not be getting involved in shootings because according to SIMS, if SANDERS is arrested, the Chicago and Trumbull drug spot will fail. SANDERS further stated that at the time of the shooting, SANDERS was in the gangway urinating and that he fired off all rounds in his firearm. Later in the conversation, SANDERS stated that he picked up his shell casings and discarded them.

82. Later that same morning, at approximately 10:31 a.m. (call session #2177), SANDERS received an incoming call on Target Phone 8 from an unidentified male (UM-1410), who was using telephone number (708) 955-1410. During the conversation, UM-1410 stated, "Hey you know that shit wasn't shit last night lord big fella was trying to see where the shots came from Lord." SANDERS stated, "Yeah lord listen, I aint tripping on that shit. If a motherfucker out here shooting and a motherfucker don't know where the shots coming from. Motherfuckers were not shooting at him motherfuckers just shooting at any car that stop through this motherfucker you feel me." UM-1410 replied, "Yeah that's valid." SANDERS stated, "That's all that was." UM-1410 stated, "Yeah, I already cause I had just got in the car and bullet holes come from the back of the car and the side you feel me. I'm like that's lord them they are shooting they don't know it's us. I'm telling him that but you know how that shit go he off the pills and you wet up a little bit you feel you know how that shit go man." SANDERS replied, "Yeah." UM-1410 stated, "That shit aint nothing you know we riding with you whether you right or wrong Lord, on my dead mama." Later in the conversation, SANDERS stated, "It was cool last night I wasn't on no bullshit with y'all I just be trying to protect to the neighborhood. I aint trying to get into it with no other motherfucker. Bust some motherfuckers that aint from around this motherfucker."

83. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, SANDERS and UM-1410 discussed a shooting incident that occurred earlier that morning. UM-1410 stated that he entered

a vehicle and then realized that bullets struck the rear and side of his vehicle. UM-1410 stated that he knew it was SANDERS shooting but also knew that SANDERS mistakenly shot at UM-1410's vehicle believing that the vehicle contained the individual shooting towards the Chicago and Trumbull drug spot. SANDERS informed UM-1410 that he shot his firearm because he was trying to protect the neighborhood [the Chicago and Trumbull drug spot]. SANDERS further stated that while he is not involved in any conflicts with other opposing groups, he wanted to protect the drug spot. SANDERS then asked UM-1410 where exactly UM-1410 was parked during the incident and UM-1410 stated that he was double parked on Chicago Avenue and may have been moving at the time of the shooting.

84. Based on intercepted calls and surveillance described above, my knowledge of the investigation and my training and experience, I believe that a random shooting occurred in the vicinity of the Chicago and Trumbull drug spot and SANDERS, who believed his drug spot was the intended target, reacted by shooting towards a vehicle he believed contained the person who fired the initial gunshots. Later that morning, SIMS expressed to SANDERS that SANDERS should not be getting himself involved in shootings because SANDERS is the leader of the drug spot. SIMS further explained that if SANDERS is gone, the drug spot will fail. Later that same day, SANDERS explained to UM-1410, who is believed to be the individual inside the gray Buick SUV at the time of the shooting, that he was just protecting his drug spot.

16. On or About June 6, 2023, RAHEEM SMITH Possessed a Gun Provided by TERRANCE SANDERS.

85. On or about June 5, 2023, at approximately 10:53 p.m. (call session #2398), SANDERS placed an outgoing call to SMITH, who was using Subject Phone 1. During the conversation, SANDERS stated “Yo come back to the gate bro. Who ya hang with? How you finna get home.” SMITH replied, “I was waiting on ...” SANDERS stated, “Ya’ll ass out here tweaking bro.” SANDERS stated “I ain’t finna drop you off. Not finna drop you off...Come get your pipe [gun].” SMITH stated, “I ain’t even got no pipe. ‘Mecco’ [TARTT] for the pipe.” SANDERS stated, “Here, here. I got it. Here. No, he is taking it with him.” SMITH stated, “I got a ride to the crib and all that.” In the background, an unknown male stated, “Take this pipe with you. Be careful man.”

86. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS instructed SMITH to meet him at the gate and told SMITH that he was not taking SMITH home because the gun would be in the car. An unidentified individual in the background then told SMITH to be careful.

87. During the time of the intercepted call described above, at approximately 10:54 p.m., using a POD camera, LEOs observed SANDERS driving arrive in the alley behind the Cell Phone Store driving Subject Vehicle 6. Shortly after, SMITH approached the front passenger side of Subject Vehicle 6 and reached into the window. SMITH retrieved an unknown item and placed the item in the center of his waistline.

88. At approximately 11:00 p.m. (call session #2310), SANDERS placed an outgoing call to PAULK, who was using Target Phone 3. During the conversation, SANDERS stated, "Alright, I gave 'Mecco' [TARTT] the two [narcotics]...I gave that lick [gun] to 'Skeem' [SMITH]." PAULK asked, "To Skeem?" SANDERS replied, "He ain't got no Ruger. That's like a nine [millimeter caliber] he got." PAULK stated, "No, I said that's a FN [handgun model]." SANDERS asked, "Oh it just shoot nine shells?" PAULK replied, "Yeah." SANDERS stated, "I gave that to him. I'm finna drop Mecco ass off at home."

89. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SANDERS informed PAULK that he provided SMITH with a handgun and PAULK clarified that the handgun was an FN model that shoots nine-millimeter caliber rounds of ammunition. SANDERS confirmed that he provided SMITH with that handgun.

90. The next day, on or about June 6, 2023, law enforcement conducted surveillance near the residence located at 4825 South Drexel Boulevard in Chicago, believed to be SMITH's residence based on research conducted on law enforcement databases. At approximately 8:42 a.m., LEOs observed SMITH exit the front of the residence located at 4825 South Drexel Boulevard. As SMITH was walking, LEOs observed SMITH adjust his waistband area and observed a gun tucked under SMITH's waistband. LEOs continued to follow SMITH until at approximately 9:05 a.m., LEOs observed SMITH enter the Chicago Transit Authority's ("CTA") 'Green Line' train platform located near the 4700 block of South Prairie Avenue. Based on

the investigation to date, LEOs believed that SMITH was en route to the Chicago and Trumbull drug spot and relocated to the nearest train platform to the drug spot.

91. At approximately 9:55 a.m., LEOs observed SMITH exit the train platform located near North Kedzie Avenue and West Lake Street. Moments later, officers in an enforcement vehicle conducted an investigative stop on SMITH on the 200 block of North Kedzie Avenue. LEOs explained to SMITH they stopped him because he fit the description of a train robbery suspect. During their pat down of SMITH, LEOs discovered a handgun concealed in SMITH's center waistband. Officers seized the handgun and placed SMITH into custody. SMITH was transported to CPD's 11th District headquarters for processing. LEOs observed that the handgun seized from SMITH was a loaded model FN 509 9 millimeter pistol, bearing serial number GKS0224379, consistent with the description of the handgun SANDERS and PAULK discussed in call session #2310.

92. Based on the sequence of events described above, my knowledge of the investigation and my training and experience, I believe that SANDERS provided SMITH with the gun to protect himself and to further the narcotics trafficking operation. I further believe that following the shooting incident that occurred on June 4, 2023, as discussed in further detail above, SANDERS has taken extra precautions to protect his narcotics operation.

17. On or About June 16, 2023, TERRANCE SANDERS Arranged a Meeting to Retrieve Narcotics Supplies from DEMORRIS HILL.

93. On or about June 16, 2023, at approximately 8:29 a.m. (call session #3423) SANDERS placed an outgoing call to DEMORRIS HILL, who was using telephone number (312) 721-5737.²¹ During the conversation, HILL asked, “Hey look...you called me about that black [heroin] right?” SANDERS replied, “Man I'm calling about anything bro. This shit I got ain't nothing bro.” HILL asked, “What you got left?” SANDERS replied, “Yeah.” HILL asked, “Hello?” SANDERS replied, “Yeah. N*****, what you got?” HILL stated, “Shit, the same shit I gave you.” SANDERS replied, “Nah, how the hell you got the same shit [narcotics], n*****, and you said you got something new? You over here with a little bit left then.” HILL stated, “Oh, that's black [black heroin].” SANDERS asked, “Yeah but where that black shit at that you had gave me?” HILL replied, “I got it.” SANDERS stated, “I need to probably buy ten

²¹ Law enforcement identified HILL as the user of the phone number (312) 721-5737 based on the following: As discussed below, on or about June 16, 2023, between approximately 8:29 a.m. and approximately 9:04 a.m., SANDERS exchanged phone calls with the phone number (312) 721 -5737. During the calls, the user of (312) 721 -5737 (subsequently identified as HILL) agreed to meet with SANDERS to exchange black tar heroin at a gas station at the corner of Independence Blvd. and W. Harrison Street in Chicago. At approximately 9:22 a.m., law enforcement observed HILL arrive at the location in a GMC pickup truck registered to a business associated with HILL, which law enforcement previously had observed HILL using during a meeting with SANDERS at a gas station on or about June 9, 2023. At approximately 9:30 a.m., LEOs approached HILL as he was on foot in the gas station parking lot. As discussed below, HILL fled on foot and attempted to place an unknown item or items in a sewer drain. LEOs stopped and arrested HILL and recovered from the sewer drain two bags containing suspected heroin. LEOs also recovered from HILL's person a valid Illinois driver's license in HILL's name bearing a photo of HILL that matched HILL's appearance during the arrest. During law enforcement's post-*Miranda* interview of HILL, LEOs asked HILL for his phone number and HILL provided the phone number (312) 721-5737, the same phone number he used to speak with SANDERS in call session #3423 and call session #3430. Additionally, the LEOs speaking with HILL listened to call sessions 3423 and 3430 and confirmed that the voice in the call sessions is the voice belonging to HILL.

of that..." HILL stated, "Ok, ok. Look look, I'mma bring that, and umm you gonna have to me meet me up north. I'mma meet this n***** up north for that black for you." SANDERS asked, "How long?" HILL replied, "Uhh, shit about, about a hour." SANDERS stated, "Yeah. I might as well ride with you." HILL asked, "Where you at?" SANDERS stated, "I'm sitting on the block [the drug spot]. Boy, I'm...this bitch...I swear to God this bitch slow [in narcotics sales]. All the motherfuckers [narcotics customers] walking past bro. I don't know. Remember, I just got the white one [white heroin] from you right?" HILL replied, "Yeah." SANDERS stated, "But, I ain't have them with the black one. So, now they ain't really selling that shit. Cause it probably needed both of them.." HILL stated, "Aight, I got you. Soon as I come out, I'mma tell you where to meet me at."

94. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS requested a different supply of heroin from HILL, because SANDERS was unhappy with the quality of the heroin supply he previously received from HILL. I believe HILL then informed SANDERS that he had black tar heroin, which SANDERS agreed to purchase from HILL. HILL then stated that he would retrieve the black tar heroin from an unidentified individual and SANDERS stated that he was willing to ride along with HILL. SANDERS complained to HILL that the white heroin HILL had previously provided SANDERS was not selling well and he has not sold black tar heroin yet. Later, HILL informed SANDERS that he would inform SANDERS with the meeting location.

95. At approximately 9:04 a.m. (call session #3430), SANDERS received an incoming call on Target Phone 8 from HILL, who was using telephone number (312) 721-5737. During the conversation, HILL stated, “Hey. Meet me on uh...by you know where the BP [gas station] at on Independence [Boulevard]?” SANDERS asked, “Which one?” HILL replied, “And Harrison [Street].” SANDERS stated, “Yeah.” HILL stated, “BP right there.” SANDERS asked, “I’mma jump in there with you?” HILL replied, “I’m finna meet him right by there.” SANDERS stated, “Aight, aight. I’m finna pull up then.”

96. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SANDERS and HILL agreed to meet at the BP gas station located near the intersection at South Independence Boulevard and West Harrison Street.

97. Following the intercepted calls described above, LEOs on surveillance relocated to the area near the BP gas station and at approximately 9:22 a.m., mobile surveillance observed a GMC pickup truck arrive and park along the street in front of the BP gas station located on the 3700 block of West Harrison Street. About two minutes later, at approximately 9:24 a.m., mobile surveillance observed a white Toyota sedan park directly behind the GMC pickup truck. At about the same time, mobile surveillance observed Subject Vehicle 6, driven by SANDERS traveling in the vicinity of the BP gas station but did not stop at the gas station. Moments later, mobile surveillance observed HILL exit the driver’s seat of the GMC pickup truck and enter the front passenger seat of the white Toyota sedan. At approximately 9:30 a.m.,

mobile surveillance observed HILL exit the front passenger seat of the white Toyota sedan and at that time, LEOs in an enforcement vehicle attempted to stop HILL. However, at that time, HILL, who was still on foot, began to run. LEOs in the enforcement vehicle exited their vehicle and chased HILL. During the chase, LEOs observed HILL run southbound on the 600 block of South Lawndale Avenue and place unknown items into a sewage drain. At that time, LEOs stopped HILL and recovered two black plastic bags containing black-colored suspected heroin from the sewage drain. LEOs seized the suspected heroin,²² placed HILL into custody and transported him to CPD's 11th District Headquarters for questioning.

98. At approximately 9:47 a.m. (call session #3446), SANDERS placed an outgoing call on Target Phone 8 to an unidentified user who was using telephone number (305) 341-4133 (UN-4133). While SANDERS waited for the call to be answered, SANDERS stated an unidentified male (UM-2) in the background, "This a unmarked [unmarked law enforcement vehicle] right here." UM-2 replied, "Oh ok. Yeah I thought you was talking about...." SANDERS stated, "No the car in front of that. That's unmarked." UM-2 stated, "Yeah I know." SANDERS stated, "No the car in front of that. That's unmarked." Call session #3446 was never answered.

99. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that while SANDERS was

²² The two black plastic bags containing black suspected heroin (Bag A and Bag B) were each weighed and field-tested for controlled substances. Bag A weighed approximately 27 grams (including packaging) and field-tested positive for heroin. Bag B weighed approximately 16 grams (including packaging) and field-tested positive for heroin and fentanyl. Bag A and Bag B were later submitted to the Illinois State Police Laboratory for testing and analysis. The results are pending.

calling UN-4133, SANDERS and UM-2 observed LEOs' stop of HILL and discussed their observations at the same time of call session #3446.

B. SHAVELLE SIMS Managed Street-Level Drug Trafficking Activities for the SANDERS DTO Under TERRANCE SANDERS' Direction.

100. As described briefly above, SHAVELLE SIMS is a street manager for the Chicago and Trumbull drug spot, who is responsible for supervising the street-level sales of narcotics at the drug spot and coordinating the supply of crack cocaine provided by PARTAGNAN BURCH. SIMS also delivered narcotics from the fixed stash houses to the other stash locations in the vicinity of the Chicago and Trumbull drug spot as well as directly to the drug spot.

1. On or about February 10, 2023, SHAVELLE SIMS Directed DEMECCO TARTT to Supply a Pack Worker with Narcotics for Resale.

101. On or about February 10, 2023, at approximately 2:52 p.m. (call session #606), SIMS placed an outgoing call on Target Phone 1 to TARTT, who was using telephone number (773) 205-7431 ("Subject Phone 18").²³ During the conversation, TARTT stated, "Yo." SIMS stated, "Grab you a two [quantity of narcotics] out the car [the red Audi hatchback parked in the rear lot behind the Cell Phone Store]. At the bottom." TARTT replied, "Oh, oh, oh. Ok." SIMS stated, "And um while you working

²³ Law enforcement identified DEMECCO TARTT as the user of Subject Phone 18 based on the following: on or about December 21, 2022, at approximately 6:09 p.m., using a City of Chicago Police Observation Device ("POD") camera, LEOs observed TARTT enter the front passenger seat of a gray Chrysler Pacifica that was parked on the 800 block of North Trumbull Avenue. While observing TARTT through the front windshield of the vehicle, a LEO placed an outgoing call to Subject Phone 18 and observed on POD footage as TARTT appeared to remove a cell phone from his jacket pocket, look at the screen, and place the cell phone to his ear. At that time, the LEO heard the user of Subject Phone 18 state, "Hello. Hello." The LEO did not reply and observed TARTT lower the cell phone from his ear.

that, give “Curt” [Individual A] the 14 [quantity of unspecified narcotics]. Let me see.” TARTT replied, “Shit, that shit’s...” SIMS asked, “It’s gone?” TARTT stated, “Shit, there ain’t no it ain’t no whole 14 [quantity of narcotics] though. I’m sure there like 10 rocks [narcotics]... or 9.” SIMS stated, “I just don’t wanna send them to you. But, aight.”

102. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe SIMS instructed TARTT to grab a quantity of unspecified narcotics out of the red Audi hatchback that is parked behind the Cell Phone Store. Furthermore, SIMS instructed TARTT to grab a quantity of narcotics for Individual A, a pack worker at the Chicago and Trumbull drug spot. TARTT informed SIMS that the red Audi contains less narcotics than requested.

103. At approximately the same time as the intercepted call described above, using a pole camera, LEOs observed TARTT²⁴ enter the red Audi. A few minutes later, TARTT was observed exiting the red Audi.

104. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe TARTT obtained a supply of narcotics from the red Audi to supply the Chicago and Trumbull drug spot at SIMS’ direction.

²⁴ Law enforcement identified TARTT based on comparison to his previous arrest photograph in the Chicago Police Department Data Warehouse system.

2. On or about February 11, 2023, SIMS and TARTT Discussed Supplying Individual A with Narcotics for Resale.

105. On or about February 11, 2023, at approximately 2:51 p.m., (call session #630), SIMS placed an outgoing call on Target Phone 1 to Subject Phone 1, used by RAHEEM SMITH, during the conversation, SMITH stated, “Yo.” SIMS stated, “Tell Curt to pick it up. Meet me in the middle.” SMITH stated to someone in the background, “Hey Curt [Individual A]! Four [SIMS] said ‘meet him in the middle.’” SMITH than stated to SIMS “Here, he’s coming.”

106. At approximately the same time of the above-described call, using a pole camera, LEOs observed Individual A, who was identified based on comparison to his State of Illinois identification photograph, walk on the 800 block of North Trumbull Avenue to Subject Vehicle 2, believed to be driven by SIMS. LEOs observed Individual A and the driver of Subject Vehicle 2 engage in a hand-to-hand narcotics transaction. LEOs then observed Individual A conceal the suspected narcotics underneath the seat of a motorbike that was chained to a fence on the 800 block of North Trumbull Avenue.

3. On or about February 17, 2023, RAHEEM SMITH, Using Target Phone 1, and SIMS, Using Target Phone 5, Arranged a Sale of Narcotics.

107. On or about February 17, 2023, at approximately 4:55 p.m., (call session #699), SMITH received an incoming call on Target Phone 1 from an unidentified male (“UM-7920”), who was using telephone number (773) 412-7920. Based on voice

comparison²⁵ and previous intercepted calls, LEOs believe the phone was being used by SMITH at this time. During the conversation, SMITH stated, “Yo.” UM-7920 stated, “Yo. This Shavelle [SIMS]?” SMITH stated, “Who is this?” UM-7920 stated, “This Hasan.” SMITH stated, “What up.” UM-7920 stated, “Hey. I was about to say... Hey, let me come through uh, get a ounce [of narcotics].” SMITH asked, “A ounce [narcotics] of what?” UM-7920 stated, “Of the C [crack cocaine].” SMITH stated, “Ah. I’m finna call him [SIMS].” UM-7920 stated, “Aight.” SMITH stated, “Aight.”

108. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe UM-7920 contacted Target Phone 1, believing it to be used by SIMS, to purchase an ounce of crack cocaine. I further believe SMITH informed UM-7920 that SMITH would have to call SIMS for the requested quantity of narcotics.

109. Based on the analysis of the pen register installed on (773) 202-6226 (“Subject Phone 1”), immediately after the call with UM-7920, at approximately 4:56 p.m., SMITH, using Subject Phone 1, placed an outgoing call to Target Phone 5, used by SIMS, which lasted approximately 36 seconds. Immediately after placing the call to Target Phone 5 (used by SIMS), at approximately 4:57 p.m. (call session #700),

²⁵ Based on a voice comparison conducted by law enforcement, LEOs believe that the user of Target Phone 1 in call session #699 is the same voice as the user of Target Phone 1 in call session # 670 described above.

SMITH placed an outgoing call on Target Phone 1 to UM-7920.²⁶ During the conversation, SMITH stated, “He [SHAVELLE SIMS] said in the morning [for the ounce of crack cocaine].” UM-7920 asked, “In the morning?” SMITH stated, “Yeah.” UM-7920 stated, “Alright.”

110. Based on the intercepted calls described above (call sessions #699 and #700), the analysis of the pen register showing the only call SMITH placed between those two calls was the above-referenced call from Subject Phone 1 to Target Phone 5 (used by SIMS), my knowledge of the investigation, and my training and experience, I believe SMITH contacted SIMS on Target Phone 5, for instructions on selling UM-7920 the requested amount of crack cocaine. Further, I believe that after speaking with SIMS, SMITH informed UM-7920 that the requested narcotics would be ready the following morning to complete the narcotics transaction.

4. On or About February 20, 2023, TARANCE BANKS Provided Information to SIMS About His Remaining Supply of Narcotics.

111. On or about February 20, 2023 at approximately 12:46 p.m. (call session #716), SIMS received an incoming call on Target Phone 1 from BANKS, who was using telephone number (331) 271-6088. During the conversation, BANKS stated, “Tell them “Ps” [narcotics customers] come on if they want something [narcotics]. I could serve [sell]. I can’t see.” SIMS replied, “It was just one, one P right here. “Willie”

²⁶ Between the two calls between SMITH, using Target Phone 1, and UM-7920, the only call SMITH placed using either Target Phone 1 or Subject Phone 1 (the other phone number known to be used by SMITH), was the above-referenced call to Target Phone 5.

just hit [sold narcotics] him.” BANKS stated, “Oh, I thought Willie couldn’t get to his shit [narcotics].” SIMS stated, “No, he just hit him.”

112. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that BANKS informed SIMS that he was able to sell narcotics to customers. SIMS then informed BANKS that another associate known as “Willie” sold narcotics to the customer.

5. On or About March 1, 2023, SIMS Instructed BANKS to Sell His Supply of Crack Cocaine.

113. On or about March 1, 2023, at approximately 12:28 p.m. (call session #912), SIMS placed an outgoing call to BANKS, who was using telephone number (331) 271-6088.²⁷ During the conversation, SIMS stated, “Hey, leave this shit alone bro. You finna work...you work your rocks [crack cocaine], bro. He gonna work his blows [heroin].” BANKS replied, “Hey Four [SIMS], I ain’t even mad, G. I’m finna just go smoke me some weed and calm down.” SIMS stated, “Yeah, just leave, yeah.” BANKS stated, “I don’t be on that bro. I’m just tryna get some money.”

114. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe the call resulted from a conflict BANKS had with an unknown narcotics associate. SIMS directs BANKS to sell crack cocaine and the other unknown narcotics associate will sell heroin.

²⁷ Law enforcement identified BANKS as the user of the/ telephone number 331-271-6088 based on the following: on or about January 22, 2023, Chicago Police Officers arrested TARANCE BANKS for a narcotics-related offense. During his post-*Miranda* interview, LEOs asked BANKS for his phone number and BANKS provided the phone number (331) 271-6088.

6. On or about March 15, 2023, SIMS Supplied the Chicago and Trumbull Drug Spot with Narcotics from 1637 North Karlov Avenue

115. On or about March 15, 2023, at approximately 12:09 p.m. (call session #20655), SANDERS received an incoming call on (872) 305-0940 (“Target Phone 4”) from SIMS, who was using (773) 302-6553 (“Target Phone 1”). During the conversation, SANDERS stated, “Yeah.” SIMS asked, “Yeah, you got some [narcotics] ready?” SANDERS stated, “Yeah, where you at?” SIMS stated, “On my way there.” SANDERS stated, “Aight, come up the back.” SIMS stated, “Aight.”

116. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS contacted SANDERS for a resupply of narcotics. SANDERS informed SIMS that there was a supply of narcotics ready and to come to the back of 1637 North Karlov Avenue²⁸ in Chicago, Illinois to retrieve the supply of narcotics that were to be sold at the Chicago and Trumbull drug spot.

117. At approximately 12:16 p.m., using a pole camera, LEOs observed a black Volkswagen Sedan, driven by SIMS, (“Subject Vehicle 2”) arrive at the rear of 1637 of North Karlov Avenue. SIMS²⁹ exited Subject Vehicle 2 and used keys to open the rear gate and door of 1637 North Karlov Avenue and then entered the residence.

²⁸ Based on the investigation to date, LEOs believe 1637 North Karlov Avenue is a stash house location used by members of the TVLs to store narcotics.

²⁹ Law enforcement identified SIMS based on comparison to his State of Illinois driver’s license photograph.

At approximately 12:21 p.m., SIMS exited 1637 North Karlov Avenue, returned to Subject Vehicle 2, and departed the area.

118. On the same date, at approximately 12:32 p.m., using a pole camera, LEOs observed SIMS, driving Subject Vehicle 2, arrive in the rear parking lot of the Cell Phone Store. SIMS exited Subject Vehicle 2 and entered the front passenger side of the red Audi parked in the same lot. A short while later, SIMS exited the red Audi and departed the area in Subject Vehicle 2.

119. Based on the surveillance and the call described above, I believe that SANDERS coordinated the delivery of narcotics supplies from the stash house located at 1637 North Karlov Avenue to the Chicago and Trumbull drug spot. I further believe that SIMS delivered the supply of narcotics he received from SANDERS to the temporary stash location in the red Audi that is parked behind the Cell Phone Store in order to resupply the Chicago and Trumbull drug spot with narcotics.

7. On or about March 14, 2023, TERRANCE SANDERS, DELAWRENCE ISON, and BRIAN WILLIAMS Delivered Narcotics Retrieved from a Suspected Stash House to TYRON PAULK.

120. On or about March 14, 2023, at approximately 11:15 a.m. (call session #20387), SANDERS placed an outgoing call on Target Phone 4 to PAULK, who was using Target Phone 3. During the conversation, PAULK stated, “Yo.” SANDERS stated, “Hey, yeah, I’ll be your way in like an hour bro.” PAULK stated, “Aight.”

121. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS informed PAULK

that he would be bringing the resupply of narcotics for the Chicago and Trumbull drug spot in approximately one hour.

122. Later that same morning, at approximately 11:58 a.m. (call session 20388), SANDERS placed on outgoing call on Target Phone 4 to telephone number (773) 577-3856, used by BRIAN WILLIAMS.³⁰ During the conversation, WILLIAMS stated, “Yo.” SANDERS asked, “Where you at?” WILLIAMS stated, “Just left Advanced Auto Parts, right here, getting this part.” SANDERS asked, “Which one?” WILLIAMS replied, “Right there by the crib.” SANDERS asked, “Oh, by your way?” WILLIAMS stated, “Yeah.” SANDERS asked, “How long till you come back this way?” WILLIAMS stated, “Ah, about 10-15 [minutes], you ready?” SANDERS stated, “Yeah, come and get me.” WILLIAMS stated, “Aight.” SANDERS stated, “[Unintelligible].” WILLIAMS stated, “Aight.” SANDERS stated, “go around back.” WILLIAMS stated, “Aight.”

123. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS asked WILLIAMS to meet him at 1637 North Karlov Avenue in Chicago in order to bring the resupply of narcotics to the Chicago and Trumbull drug spot.

³⁰ Law enforcement identified WILLIAMS as the user of telephone number (773) 577-3856 based on the following: On or about September 12, 2022, at approximately 12:30 p.m., using a POD camera, LEOs observed WILLIAMS standing on the northwest corner of West Chicago Avenue and North Trumbull Avenue. At that time, a LEO placed a ruse phone call to telephone number (773) 577-3856 and observed on POD camera as WILLIAMS appeared to retrieve a cell phone from his jacket pocket and place it against his ear. After a brief conversation, the call was disconnected and the LEO observed on POD camera as WILLIAMS lowered the cell phone from his ear.

124. Later that afternoon, approximately 12:23 p.m., using a pole camera, LEOs observed a silver Buick sedan arrive in the rear of 1637 North Karlov Avenue. SANDERS and DELAWRENCE ISON³¹ exited the rear of 1637 of North Karlov Avenue. LEOs observed SANDERS enter the front passenger seat while ISON entered the rear passenger seat of the silver Buick sedan. The silver Buick sedan then departed the area.

125. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe WILLIAMS picked up ISON and SANDERS from the suspected stash house located at 1637 North Karlov Avenue, under the direction of SANDERS, in order for SANDERS to deliver the resupply of narcotics to the Chicago and Trumbull drug spot.

126. On the same date, at approximately 12:30 p.m. (call session 20389), SANDERS placed an outgoing call on Target Phone 4 to PAULK, who was using Target Phone 3. During the conversation, PAULK stated, “Yo.” SANDERS asked, “Where you at?” PAULK stated, “Right here by my slot [903 North Trumbull Avenue].” SANDERS stated, “We pulling up, stay right there.” PAULK stated, “Aight.”

127. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS informed PAULK

³¹ Law enforcement identified ISON based on comparison to his previous arrest photograph in the Chicago Police Data Warehouse system.

that he would meet PAULK in front of the temporary stash location at 903 North Trumbull Avenue.

128. About two minutes later, at approximately 12:32 p.m., using a pole camera, LEOs observed the silver Buick sedan arrive at approximately 903 North Trumbull Avenue. SANDERS exited the silver Buick sedan and walked to the intersection of West Iowa Street and North Trumbull Avenue and looked around the area. At about the same time, PAULK approached the silver Buick sedan and retrieved an unknown item from WILLIAMS, who was sitting in the driver's seat of the Buick sedan. LEOs observed PAULK accept the unknown item and enter the gangway of 903 North Trumbull Avenue.

129. At approximately 12:34 p.m., using a pole camera, LEOs observed PAULK exit the rear entrance door of 903 North Trumbull Avenue.

130. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe SANDERS, WILLIAMS, and ISON delivered a supply of narcotics from the stash house located at 1637 North Karlov Avenue to the PAULK who was near the Chicago and Trumbull drug spot. Further, I believe PAULK stored the resupply of narcotics in the abandoned basement of 903 North Trumbull Avenue.

131. Later that same afternoon, LEOs coordinated a plan to search the basement of the vacant residence located at 903 North Trumbull Avenue. At approximately 1:03 p.m., LEOs in an enforcement vehicle arrived at the rear

abandoned basement unit of 903 North Trumbull Avenue and began to search the premises.

132. About 20 minutes later, at approximately 1:23 p.m. (call session #20395), SANDERS placed an outgoing call on Target Phone 4 to SMITH, who was using (773) 202-6226 (“Subject Phone 1”).³² During the conversation, SANDERS was heard speaking to an unidentified individual in the background, “They [the police] gotta be searching that building [903 North Trumbull Avenue].” The two then discussed police presence and SMITH warned other members of the drug spot regarding police presence.

133. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe SANDERS was notifying an unidentified individual that the police were searching 903 North Trumbull for the resupply of narcotics used for resale at the Chicago and Trumbull drug spot.

³² Law enforcement identified RAHEEM SMITH as the user of (773) 202-6226 based on the following: on or about June 3, 2022, at approximately 11:55 a.m., using a City of Chicago Police Observation Device (POD) camera, LEOs observed RAHEEM SMITH near the intersection of West Chicago Avenue and North Trumbull Avenue. At that time, a LEO placed an outgoing call to Subject Phone 1, believed to be used by RAHEEM SMITH. The LEO who placed the call observed RAHEEM SMITH answer a cell phone in his possession. The LEO and RAHEEM SMITH engaged in a brief conversation. Shortly afterwards, at approximately 11:56 a.m., the phone call was disconnected and LEOs observed RAHEEM SMITH return the cell phone to his right pants pocket.

134. At approximately 2:08 p.m., LEOs recovered approximately 118 zip lock bags containing approximately 170 grams of suspected heroin and approximately five grams of suspected crack cocaine.³³

135. Based on the surveillance and intercepted calls described above, my knowledge of the investigation, and my training and experience, I believe LEOs recovered the narcotics used for resale at the Chicago and Trumbull drug spot that were supplied by SANDERS from the previous stash house located at 1637 North Karlov Avenue with the assistance of WILLIAMS, PAULK, and ISON.

8. On or about March 15, 2023, SIMS Delivered Narcotics Retrieved from SANDERS at the Suspected Stash House.

136. On or about March 15, 2023, at approximately 12:09 p.m. (call session 20655), SANDERS received an incoming call on (872) 305-0940 (“Target Phone 4”) from SIMS, who was using Target Phone 1. During the conversation, SANDERS stated, “Yeah.” SIMS asked, “Yeah, you got some [narcotics] ready?” SANDERS stated, “Yeah, where you at?” SIMS stated, “On my way there [to the stash house located at 1631 North Karlov Avenue].” SANDERS stated, “Aight, come up the back [of the residence].” SIMS stated, “Aight.”

137. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS contacted SANDERS for a resupply of narcotics. SANDERS informed SIMS that there was a supply of narcotics ready for distribution and instructed SIMS to go to the rear of the suspected

³³ The suspected heroin and suspected crack cocaine was subsequently submitted to the Customs and Border Protection Laboratory for testing and analysis. The results are pending.

narcotics stash house located at 1637 North Karlov Avenue³⁴ in Chicago to retrieve the supply of narcotics that were to be sold at the Chicago and Trumbull drug spot.

138. At approximately 12:16 p.m., using a pole camera, LEOs observed Subject Vehicle 2 arrive in the alley behind 1637 of North Karlov Avenue. SIMS exited Subject Vehicle 2 and used a set of keys to open the rear gate and door of 1637 North Karlov Avenue and then entered the residence.³⁵ At approximately 12:21 p.m., SIMS exited the rear of 1637 North Karlov Avenue, returned to the driver's seat of Subject Vehicle 2, and departed the area.

139. Later that afternoon, at approximately 12:32 p.m., using a pole camera, LEOs observed SIMS, driving Subject Vehicle 2, arrive in the rear parking lot of the Cell Phone Store. SIMS exited Subject Vehicle 2 and entered the front passenger side of the red Audi parked in the same lot. A short while later, SIMS exited the red Audi and departed the area in Subject Vehicle 2.

140. Based on the surveillance and the call described above, I believe that SANDERS coordinated the delivery of narcotics supplies from the suspected stash house located at 1637 North Karlov Avenue to the Chicago and Trumbull drug spot. I further believe that SIMS delivered the supply of narcotics he received from SANDERS to the temporary stash location in the red Audi that is parked behind the

³⁴ Based on the investigation to date, LEOs believe 1637 North Karlov Avenue is a stash house location used by members of the TVLs to store narcotics.

³⁵ Law enforcement identified SIMS based on comparison to his State of Illinois driver's license photograph.

Cell Phone Store to resupply the Chicago and Trumbull drug spot with additional narcotics.

9. On or about May 21, 2023, LOPEZ Informed SIMS that the Supply of Narcotics at the Drug Spot Was Running Low.

141. On or about May 21, 2023, at approximately 3:37 p.m. (call session #2125) SIMS received an incoming call on Target Phone 6 from SAMUEL LOPEZ, who was using Subject Phone 4.³⁶ During the conversation, LOPEZ asked, “Where you at, Four [SIMS]?” SIMS replied, “I’m all the way out by the...finna leave out the slot [house]. You right there [at the drug spot]?” LOPEZ replied, “Yeah I been right here. We dry [low on narcotics supply] as hell right here.” SIMS stated, “Aight I’m on my way. Ask ‘Face’ what [narcotics] he got left.” LOPEZ later yells in the background, “Hey, Face! What you got left?” LOPEZ then stated to SIMS, “he said he got two of them.” SIMS stated, “Two of them? Here I come.”

³⁶ Law enforcement identified LOPEZ as the user of Subject Phone 4 based on the following: Law enforcement database research of the phone number for Subject Phone 4 revealed that the phone number is subscribed to SAMUEL LOPEZ. Further, LEOs on surveillance have observed LOPEZ at the drug spot near the intersection of West Chicago Avenue and North Trumbull Avenue multiple times. Law enforcement identified LOPEZ based on his State of Illinois identification photograph. Additionally, on or about July 6, 2022, at approximately 9:18 a.m. using a POD camera, law enforcement officers (“LEOs”) observed SAMUEL LOPEZ standing on the northwest corner sidewalk of West Chicago Avenue and North Trumbull Avenue engaged in a conversation with an unidentified male. About a minute later, at approximately 9:19 a.m., a LEO monitoring the POD camera, placed an outgoing phone call to telephone number (773) 704-4529 (“Subject Phone 4”), believed to be used by LOPEZ. The LEO placing the call observed on POD camera as LOPEZ removed a cellular device from the right-side pocket of his pants, looked down at the screen of the device, and placed the device to his ear. At that time, the LEO and LOPEZ engaged in a brief conversation and less than a minute later, the conversation ended. The LEO monitoring the POD camera observed as LOPEZ lowered the cellular device from his ear and placed the device in the rear right-side pocket of his pants. On November 29, 2022, Chief Judge Rebecca R. Pallmeyer signed an order authorizing the renewed installation and use, for a period of 60 days of a pen register and a trap and trace device on telephone number (773) 704-4529 (Subject Phone 4), used by LOPEZ.

142. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that LOPEZ informed SIMS that he was at the drug spot during the time of the call described above and that they were running low on narcotics supplies. LOPEZ then asked an unidentified narcotics associate how much narcotics he had left remaining. After informing SIMS the quantity of narcotics remaining, SIMS stated that he was on his way to the drug spot.

143. Additionally, during call session #2125, using a POD camera, LEOs observed LOPEZ standing on the 800 block of North Trumbull Avenue and appeared to be speaking on a cell phone.

C. SHAVELLE SIMS Supplied the Chicago and Trumbull Drug Spot with Crack Cocaine Provided by PARTAGNAN BURCH.

144. In addition to SIMS's above-described role managing street-level drug trafficking activities for the SANDERS DTO, based on court-authorized interceptions of wire communications, law enforcement surveillance, and a seizure of crack cocaine on or about April 1, 2023 (discussed further below), law enforcement determined that SIMS, since no later than March 2023, has been coordinating the supply of crack cocaine to the Chicago and Trumbull drug spot with PARTAGNAN BURCH, a supplier of crack cocaine.

1. On or about March 14, 2023, SIMS and PARTAGNAN BURCH Discussed Narcotics Trafficking Activities.

145. On or about March 14, 2023, at approximately 8:57 a.m. (call session #5112), SIMS received an incoming call on Target Phone 5 from BURCH, who was

using Target Phone 9.³⁷ During the conversation, BURCH stated, “You need the rest of that shit [narcotics]?” SIMS stated, “Mmm, yeah. Imma need it. I still got one... one of those packs [quantity of narcotics] left.” BURCH stated, “Aight I’m just gonna have... take it to OG crib.” SIMS stated, “Aight.” BURCH asked, “What you want me to do?” SIMS asked, “Huh?” BURCH stated, “I said... and take it to OG crib.” SIMS stated, “Oh, you said, give it to OG?” You can give it to Shay.” BURCH stated, “Ok, aight. Aight, bet.”

146. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS stated that he still had a small quantity of narcotics remaining and then instructed BURCH to provide the narcotics to an unidentified associate.

147. Later that same day, at approximately 7:12 p.m. (call session 5165), SIMS placed an outgoing call on Target Phone 5 to BURCH, who was using Target Phone 9. During the conversation, SIMS stated, “Yo, you gotta start using the little bags cause yo rocks [crack cocaine] little as fuck.” BURCH asked, “I gotta start using the little bags? They [crack cocaine] ain’t small though.” SIMS stated, “Them bitches itsy [small], bro. They ass [narcotics customers] be complaining about them bitches all day.” BURCH asked, “So why you ain’t ever seen that then?” SIMS stated, “[Unintelligible].” BURCH stated, “... why won’t you just do it then?” SIMS stated,

³⁷ As discussed further below, LEOs identified PARTAGNAN BURCH as the user of Target Phone 9 during the traffic stop that occurred in the rear lot of the Cell Phone Store on or about April 1, 2023. During the traffic stop, BURCH was on a call with SIMS, who was using Target Phone 5. Additionally, LEOs conducted voice comparison of the body worn camera footage from the traffic stop to intercepted calls involving (773) 367-8834 and determined BURCH as the user of (773) 367-8834.

“I won’t be getting back what you be getting back. See?” BURCH asked, “What you be getting back?” SIMS stated, “I be still getting a 12 [bags] and shit...13. You be scratching yo shit to 15 [bags]. I will never get 15. But my rocks [crack cocaine] be decent size though.” BURCH asked, “Oh they be decent size?” SIMS stated, “Yeah, see... I will, I will never get 15.” BURCH stated, “Aight... Aight, bet. Aight, don’t worry about it...” SIMS stated, “Bet.”

148. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS informed BURCH that the bags BURCH used for narcotics packaging were too big and BURCH requested SIMS to start using smaller sized bags. SIMS then stated that narcotics customers complained about the size of the crack cocaine. SIMS explained that he does not earn the same amount of proceeds BURCH earns in profit. SIMS then stated that BURCH produces crack cocaine so small that there are 15 bags containing crack cocaine in each pack.

2. On or about March 24, 2023, SIMS Coordinated Narcotics Activity with BURCH.

149. On or about March 24, 2023, at approximately 9:24 a.m. (call session #5640), SIMS placed an outgoing call on Target Phone 5³⁸ to PARTAGNAN BURCH,

³⁸ Law enforcement identified SIMS as the user of Target Phone 5 based on the following: On or about September 12, 2022, at approximately 10:08 a.m., using a POD camera, LEOs observed SHAVELLE SIMS standing on the northwest corner of the intersection on West Chicago Avenue and North Trumbull Avenue. At that time, a LEO placed an outgoing call to Target Phone 5 and observed on POD camera as SIMS appeared to look at the screen of a cell phone in his possession and place the cell phone to his ear. The LEO and SIMS had the following conversation that is not verbatim: the LEO asked for “Mike,” SIMS asked who the LEO was looking for. The LEO repeated “Mike,” at which point SIMS stated that it was not “Mike.” The LEO replied that it was the wrong number. After, the phone call ended LEOs observed on POD camera as SIMS lowered the cell phone from his ear and placed it in the back side pocket of his pants.

who was using telephone number (773) 367-8834 (“Target Phone 9”). During the conversation, BURCH stated, “Where you at fool?” SIMS stated, “Right here, pulling up to ‘Rock’s’ [SANDERS] crib right quick.” BURCH asked, “Pulling up to Rock crib?” SIMS stated, “Yeah.” BURCH stated, “I’m trying to bust this side move [conduct narcotics activity] today, my n****. I need to slide on you.” SIMS stated, “Yeah, I got to...” BURCH stated, “Really, trying to bust it right now, really. Cause n**** waiting on me.” SIMS stated, “Yeah, you gotta give me a second. I ain’t even bring the nickel [money to purchase narcotics supplies] out. But give me a second. Make sure you’ll have it from me in a minute.”

150. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS informed BURCH that he was on the way to SANDERS’ residence located at 1637 North Karlov Avenue. Further, I believe BURCH stated that he wanted to meet with SIMS to retrieve narcotics proceeds. SIMS replied that he did not have the proceeds with him at the time but would be able to provide them to BURCH shortly.

3. On or about March 28, 2023, SIMS Asked BURCH to Purchase New Narcotics Packaging.

151. On or about March 28, 2023, at approximately 5:56 p.m. (call session #5851), SIMS received an incoming call on Target Phone 5 from BURCH, who was using Target Phone 9. During the conversation, BURCH asked, “Yo, you go up and get the other bags [narcotics packaging]?” SIMS replied, “Hell no. My goofy ass forgot when I went to go get money. I forgot all about that damn bags. Where you at?” BURCH asked, “Huh? Where I’m at?” SIMS replied, “Yeah.” BURCH stated, “Right

here finna uh...what's up?" SIMS stated, "I should tell you to grab them [the bags]." BURCH asked, "Where they at?" SIMS replied, "At 'Mac's' [store]." BURCH asked, "Oh out west? What time Mac's close?" SIMS replied, "Like nine [o' clock]." BURCH stated, "Oh I could grab it then. I could do that when I go to 'Shay' and them." SIMS stated, "Yeah, they don't close til like nine." BURCH asked, "Like nine? You know the size of them? Which one?" SIMS replied, "When you get up there, Facetime me. They gonna have them on the board." BURCH asked, "Yeah, where you at?" SIMS replied, "I'm right here sitting on the block [the drug spot]." BURCH asked, "Oh you sitting on the block? Hey, so I gotta I need to have that shit [narcotics] uh for you to get it by tonight? Or in the morning?" SIMS stated, "I still got the same damn two packs [of crack cocaine] that I had when you pushed off [delivered]. They [the pack workers] haven't even finished [selling] the pack they got."

152. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that BURCH asked SIMS if SIMS had the other bags used to package narcotics. SIMS replied that he did not have the bags and requested BURCH to purchase the bags from a store. BURCH then asked SIMS if he should get the narcotics ready for that night and SIMS stated that he still had the two packs of narcotics from when BURCH delivered and that the pack workers at the drug spot still have two packs of narcotics left to sell.

4. On or about March 31, 2023, SIMS and BURCH Discussed the Size of the Contents in the New Narcotics Packaging.

153. On or about March 31, 2023, at approximately 7:52 a.m. (call session #6017), SIMS received an incoming call on Target Phone 5 from BURCH, who was

using Target Phone 9. During the conversation, "BURCH asked, "You want me to leave it [the narcotics] with 'Shay' or what?" SIMS replied, "You could give it [narcotics] to her. She finna go to work?" BURCH replied, "Yeah she going to work." SIMS stated, "You could give it to her. I'mma um...if you come this way, I could give you the bags. I gotta get the rest [of the narcotics] ready for them [pack workers]." BURCH stated, "Aight, well...them bags [narcotics packaging] too little, shorty." SIMS asked, "They is?" BURCH replied, "Yeah, I....I put 'slugs' [large-sized narcotics] out here." SIMS asked, "Yeah?" BURCH replied with an unintelligible statement. SIMS then stated, "Them the right-sized bags though, ain't it?" BURCH replied, "Man, them bitches too little for what I'm putting in there." SIMS laughed and BURCH continued, "I already...I made...I already made three packs [of narcotics] cause I couldn't do them cause I was already at top [of the bags]. And I took this shit up top with...them bags too little. You know what I mean?" SIMS later asked, "Them bitches big as hell in that bag?" BURCH replied with an unintelligible statement. SIMS then asked, "You say them bitches 'slugs'?" BURCH replied, "Yeah, Four. That's why...that's why... I'mma go back to them and buy the big ones [narcotics packaging]." SIMS later stated, "Yeah...them bitches...them bitches...them bitches [narcotics customers] sure will go crazy on the first [of the month]."

154. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS and BURCH discussed the size of narcotics packaging and BURCH stated that the narcotics were too large

for the packaging. I further believe SIMS stated that the narcotics customers will be excited for the narcotics during the first of the month when the drug spot typically sells new batches of narcotics.

5. On or about April 1, 2023, Law Enforcement Officers Seized Approximately 56 Bags Containing Approximately 15.6 Grams of Crack Cocaine from PARTAGNAN BURCH.

155. On or about April 1, 2023, at approximately 12:55 p.m. (call session #6140) SIMS received an incoming call on Target Phone 5 from BURCH, who was using telephone number (773) 367-8834 (“Subject Phone 22”).³⁹ During the conversation, SIMS stated, “Yeah. I’m gonna have my last pill though in Aurora. Look, ummm where you at?” BURCH stated, “I’m at the crib.” SIMS stated, “[Unintelligible] that way.” BURCH stated, “Yeah, I was finna come that way. Wassup what you need me to do?” SIMS stated, “Umm if put, like go right there put um, whatever you put together in ‘Mecco’ [DEMECCO TARTT] car. That red car [the red Audi parked behind the Cell Phone Store].” BURCH stated, “Yeah, red.” SIMS stated, “Yeah, up under the passenger seat, don’t you know how, like a glove compartment is.” BURCH stated, “Yeah.” SIMS stated, “Under the passenger seat, it come out right there.” BURCH stated, “Right.” SIMS stated, “And then I’m finna have my lil cousin to give you whatever money he got on him. I think he still have like 6, 7 hundred and then I’m gonna CashApp you [unintelligible].” BURCH stated,

³⁹ As discussed in further detail below, LEOs identified PARTAGNAN BURCH as the user of telephone number (773) 367-8834 (“Subject Phone 22”) during a traffic stop that occurred in the rear lot of the Cell Phone Store on or about April 1, 2023. During the traffic stop, BURCH was on a call with SIMS, who was using Target Phone 5. Additionally, LEOs conducted voice comparison of the body worn camera footage from the traffic stop to intercepted calls involving Subject Phone 22 and determined BURCH as the user of Subject Phone 22.

“Alright, so so take it put it under the car seat.” SIMS stated, “Uh huh car.” BURCH asked, “Of the red car [the red Audi] SIMS stated, “Yeah.” BURCH asked, “And it’s in the back of the building [the Cell Phone Store], I mean it’s in the back of the uh phone store.” SIMS stated, “Back of the phone store, yeah.” BURCH stated, “Alright bet.” SIMS stated, “Call me when.” BURCH stated, “Right now?” SIMS stated, “Yeah, yeah call me when you coming up when you right there, behind the phone store though.” BURCH stated, “Alright.”

156. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS instructed BURCH to drop off the supply of narcotics in the red Audi located in the rear lot of the Cell Phone Store to be used for resale at the Chicago and Trumbull drug spot. Furthermore, SIMS told BURCH that a portion of the money needed to purchase the supply of narcotics will be given to him and that SIMS will send BURCH the rest of the money owed via CashApp.

157. On the same date, at approximately 1:06 p.m. (call session #6143) SIMS placed an outgoing call on Target Phone 5 to BURCH, who was using telephone number (773) 367-8834. During the conversation, BURCH stated, “Yeah.” SIMS stated, “Ay just let me know when you pull up. I’m gonna have him to put the money under the seat thing [in the red Audi].” BURCH stated, “[Unintelligible].” SIMS stated, “Alright.”

158. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS informed BURCH that

an unspecified individual would place the money to purchase the narcotics inside the red Audi parked in the rear lot of the Cell Phone Store.

159. On the same date, at approximately 1:38 p.m., LEOs monitoring a pole camera observed SIMS, driving Subject Vehicle 2, arrive in the rear lot of the Cell Phone Store. SIMS exited Subject Vehicle 2, opened the front passenger door of the red Audi, and briefly leaned into the red Audi. SIMS then closed the front passenger door of the red Audi, reentered Subject Vehicle 2, and departed the area.

160. Based on the sequence described above, my knowledge of the investigation and my training and experience, I believe SIMS placed the money needed to purchase the narcotics from BURCH inside the red Audi under the seat as discussed in call session #6143 described above.

161. Less than a minute later, at approximately 1:38 p.m. (call session #6145), SIMS received an incoming call on Target Phone 5 from BURCH, who was using telephone number (773) 367-8834. During the conversation, BURCH stated, "Yeah, I'm right. I'm in the back [of the Cell Phone Store]." SIMS asked, "You pulling in the back right now?" BURCH stated, "Yeah." SIMS stated, "Aight, let me tell him... let me tell em." BURCH stated, "Aight."

162. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe BURCH informed SIMS that he was at the parking lot behind the Cell Phone Store with the narcotics in his possession.

163. About a minute later, at approximately 1:39 p.m. (call session #6146), SIMS placed an outgoing call on Target Phone 5 to BURCH, who was using telephone number (773) 367-8834. During the conversation, SIMS stated, "Yeah, he says he already put it [narcotics proceeds] right there. It's five hundred dollars under that seat and ummm. You finna, where you finna go bro?" BURCH stated, "I'm finna run up to ahh 'Baha' right quick." SIMS asked, "Up to Baha?" BURCH stated, "Yeah." SIMS stated, "When you get done with Baha call me cause he's going to give you two more hundred dollars and I'm going to send you the rest." BURCH stated, "Aight, [unintelligible]. You say put the shit [narcotics] same spot where the money at?" SIMS stated, "Yeah." BURCH stated, "Aight, bet." SIMS stated, "You see, you know what car I'm talking about though right?" BURCH stated, "Yeah that little red [Audi]." SIMS stated, "Yeah." BURCH stated, "The little red car, Audi." SIMS stated, "Yeah, yeah." BURCH stated, "Yeah." SIMS asked, "You see it's [the red Audi] in there [the rear lot of the Cell Phone Store]?" BURCH stated, "Yeah, Imma getting out of the car right now though. What the fuck are they [the police] doing? [Unintelligible]. What? What's going on? What?" SIMS asked, "What the fuck it go?" BURCH stated, "What? Freeze? What they on, G?" SIMS asked, "They [the police] on, they on you?" BURCH stated, "Hell yeah." SIMS asked, "On the car?" BURCH asked, "What? [Unintelligible]." SIMS asked, "They on you or with at the car?" At approximately 1:40 p.m., LEOs using a pole camera observed a black Lexus sedan, believed to be driven by BURCH, parking in the lot along the rear entrance behind the Cell Phone Store next to the red Audi. Less than a minute later, at approximately

1:40 p.m., LEOs in enforcement vehicles who are members of the investigation team drove to the parking lot behind the Cell Phone Store and observed the same black Lexus sedan parked in the lot. After observing that the tint of the windows of the black Lexus appeared to violate the City of Chicago's standard of tint, LEOs in enforcement vehicles activated emergency lights and conducted a traffic stop on the parked black Lexus sedan. Based on review of one of the body worn camera of one of the LEOs who conducted the stop, the LEOs stated to BURCH that they initiated the stop because they were investigating carjackings and ATM theft in the area. While the traffic stop and call session #6146 were ongoing, BURCH stated, "Yeah, Four [SIMS]. What the fuck are they on man?" SIMS stated, "Yeah, where the fuck you at?" BURCH stated, "I'm in back of the phone shop [the Cell Phone Store]."

164. Based on the intercepted call described above, review of surveillance footage, the review of body worn camera footage from CPD officers on scene with BURCH, my knowledge of the investigation and my training and experience, I believe BURCH notified SIMS that he was being stopped by the police behind the Cell Phone Store. Furthermore, BURCH told SIMS that he had all the narcotics on him when stopped by the police. According to CPD records, during the stop, CPD officers discovered approximately 19 grams of suspected crack cocaine⁴⁰ in approximately 56 baggies in BURCH's possession. CPD officers seized the suspected crack cocaine and BURCH was subsequently released without incident.

⁴⁰ The suspected crack cocaine was submitted to the Illinois State Police Forensics Laboratory for testing and analysis. The contents in the 56 baggies were tested and found to contain a total of approximately 15.6 grams of cocaine.

165. On the same date, at approximately 1:46 p.m. (call session #6148), while remaining on the call with BURCH, SIMS placed an outgoing call to an unidentified female (UF-2663), who was using telephone number (888) 111-2663. During the conversation, SIMS asked, "You want me to have "Nick" [Individual N] come out there? Like, give to him coming out? BURCH asked, "You had him [Individual N] come out?" SIMS stated, "I'm finna call him now." Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SIMS asked BURCH if he wanted Individual N to come out and intervene with the traffic stop. Further, I believe that SIMS contacted Individual N.

166. During the traffic stop, LEOs conducted a pat down of BURCH and discovered approximately 19 grams of suspected crack cocaine contained in approximately 56 baggies in BURCH's possession. CPD officers seized the suspected crack cocaine and BURCH was subsequently released without incident.

167. At about the same time as call session #6148), at approximately 1:46 p.m. (call session #6147), SIMS placed an outgoing call on Target Phone 5 to an unidentified female ("UF-1575"), who was using telephone number (773) 877-1575. During the conversation, SIMS stated, "The motherfuckin' police got [unintelligible]. He [BURCH] got all the shit [narcotics] on him." UF-1575 stated, "Oh my god." SIMS stated, "All the shit [narcotics] on him [BURCH]. He put there behind the phone store [the Cell Phone Store]." UF-1575 asked, "Oh my fuckin' god, what phone store?" SIMS stated, "Hold on, he [BURCH] on the other line. On, on the, on Homan. Hold on, hold on."

168. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS told UF-1575 that BURCH was just stopped by the police while carrying narcotics. Additionally, SIMS told UF-1575 that BURCH was stopped by the police behind the Cell Phone Store.

169. At approximately 1:56 p.m. (call session #23242) SANDERS placed an outgoing call on Target Phone 4 to PAULK, who was using Target Phone 3. During the conversation, PAULK stated, "Yo... Hello." SANDERS stated, "Yeah, police got somebody behind the phone store [Cell Phone Store]. Homan and Fillmore [specialized police units from Chicago Police Department's Homan Square facility]." PAULK stated, "Yeah? I don't know. I just pull, we just pulled from there." Unknown male in the background of Target Phone 3 stated, "What happened?" PAULK stated, "He said uh."

170. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SANDERS informed PAULK that specialized police units from CPD's Homan Square facility were conducting an enforcement activity in the rear lot of the Cell Phone Store.

171. At approximately 2:06 p.m. (call session #6161) SIMS received an incoming call on Target Phone 5 from BURCH, who was using telephone number (773) 367-8834. During the conversation, SIMS stated, "I'm looking [unintelligible]." BURCH stated, "Shorty, they [the police] just took my pack [quantity of crack cocaine]. Lord, let me go." SIMS stated, "Get the fuck out of here!" BURCH stated, "I'm dead, they green nigga." SIMS stated, "You lying!" BURCH stated, "What, I'm

gone nigga. Took my pack [quantity of narcotics] and told me to get the fuck on, so they [the police] looking for carjackings and ATM machines.” SIMS stated, “You lying!” BURCH stated, “I swear to god!”

172. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe BURCH told SIMS that the police confiscated his narcotics during the traffic stop but did not arrest him.

173. On the same date, at approximately 2:07 p.m. (call session 6162) SIMS received an incoming call on Target Phone 5 from an unidentified female (“UF-9049”), who was using telephone number (773) 494-9049. During the conversation, SIMS stated, “They, he [BURCH] say they [the police] let him go.” UF-9049 stated, “He [BURCH] had something [narcotics] on him?” SIMS stated, “Yeah, he said they just took a pack [quantity of crack cocaine] from him and let him go.” UF-9049 stated, “What!” SIMS stated, “Yeah.” UF-9049 stated, “He needs to get the fuck...” SIMS stated, “They just went to it [unintelligible] where did they just go?” UF-9049 stated, “Huh?” SIMS stated, “He said they just took him pack and let him go.” UF-9049 stated, “He only had one on him?” SIMS stated, “No they took his pack. The shit [narcotics] he uses [sells] up north [Chicago’s north side].” UF-9049 stated, “Uh huh.” Later in the conversation, SIMS stated, “I know his ass boy. He [BURCH] had 50 rocks [crack cocaine] on him in tie bags bro, little rocks just in little tie bags.” UF-9049 stated, “Alright Shavelle, y’all be careful.”

174. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe SIMS told UF-9049 that the

police confiscated narcotics from BURCH. Furthermore, SIMS told UF-9049 that the narcotics confiscated from BURCH was the supply of narcotics that BURCH uses to sell on the north side of Chicago, but that BURCH had more narcotics on him that was not found by the police.

175. At approximately the same time, CPD officers completed their traffic stop on BURCH and using a pole camera, LEOs observed BURCH enter the front entrance of the Cell Phone Store. About two minutes later, at approximately 2:09 p.m., BURCH, SANDERS, and SIMS exited the front of the Cell Phone Store. SANDERS and SIMS departed the area and walked towards the Chicago and Trumbull drug spot while BURCH proceeded to the rear lot of the Cell Phone Store and entered the front driver's side of the black Lexus from the traffic stop. Moments later, BURCH exited the black Lexus, opened the front passenger door of the red Audi, and leaned toward the floorboard of the red Audi. BURCH then exited the red Audi, entered the black Lexus sedan and departed the area.

176. Based on the intercepted call described above, surveillance, the review of body worn camera footage, police reports, and my knowledge of the investigation and my training and experience, I believe BURCH met with SIMS and SANDERS inside the Cell Phone Store store following the traffic stop. Furthermore, at the conclusion of this sequence of events, I believe BURCH retrieved the money SIMS left inside the red Audi and replaced it with the supply of crack cocaine used for resale at the Chicago and Trumbull drug spot. Additionally, I believe that BURCH resupplied the Chicago and Trumbull drug spot with crack cocaine that was not

discovered by law enforcement during the traffic stop. Finally, I believe that SIMS was watching BURCH's traffic stop through the security camera footage from inside the Cell Phone Store in real time.

6. On or about May 12, 2023, SIMS Resupplied the Drug Spot with Narcotics Provided by BURCH.

177. On or about May 12, 2023, at approximately 8:43 a.m. (call session #6767), SIMS placed an outgoing call on Target Phone 5 to BURCH, who was using telephone number (773) 367-8834 ("Subject Phone 22").⁴¹ During the conversation, SIMS stated, "Yeah. I'm out [low on narcotics supply]. Tell 'Shay' to come outside right quick...get this bread [narcotics proceeds]." BURCH asked, "Huh?" SIMS stated, "Tell 'Shay.' She at work?" BURCH replied, "Yeah." Later, BURCH asked, "You wanna meet me somewhere? For the other shit [narcotics]?" SIMS replied, "Yeah...yeah, I'm somewhere. Call me when you...when you call me, I'll come. Or want me to..." Later, BURCH stated, "Yeah, I'll come that way." SIMS stated, "Shit, I'll meet you right...oh. It don't matter. Where you wanna meet at bro?" Later, BURCH asked, "...what if we meet on Ashland?" SIMS replied, "Yeah that's cool." Later in the conversation, Sims stated, "You could come right now. Aight."

178. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SIMS and BURCH

⁴¹ LEOs identified PARTAGNAN BURCH as the user of telephone number (773) 367-8834 ("Subject Phone 22") during a traffic stop that occurred in the rear lot of the Cell Phone Store on or about April 1, 2023. During the traffic stop, BURCH was on a call with SIMS, who was using Target Phone 5. Additionally, LEOs conducted voice comparison of the body worn camera footage from the traffic stop to intercepted calls involving Subject Phone 22 and determined BURCH as the user of Subject Phone 22.

agreed to meet at an undisclosed location on Ashland Avenue near SIMS's location to resupply the Chicago and Trumbull drug spot with additional narcotics.

179. At approximately 9:04 a.m. (call session #6770), SIMS received an incoming call on Target Phone 5 from BURCH, who was using Subject Phone 22. During the conversation, BURCH stated, "Yeah, I'm right here [at the meeting location]. I'm in car right now, shorty." SIMS replied, "Aight."

180. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that BURCH informed SIMS that he had arrived at their meeting location.

181. Later that same morning, at approximately 9:19 a.m., LEOs monitoring the tracking device installed on the silver Nissan Rogue bearing Illinois license plate CM57903 used by SIMS ("Subject Vehicle 4") tracked the vehicle's location to the BP gas station located on the 1600 block of West Van Buren Street and using a POD camera, LEOs observed Subject Vehicle 4 park next to the pumps located on the northeast side of the parking lot. Shortly after, LEOs observed a black Lexus sedan ("Subject Vehicle 5"), driven by BURCH, arrive to the same parking lot and park behind Subject Vehicle 4. At that time, SIMS exited the driver's seat of Subject Vehicle 4 and entered the front passenger seat of Subject Vehicle 5. Using a POD camera, LEOs observed through the front windshield of Subject Vehicle 5 SIMS counting money and then hand BURCH the money. Shortly after, at approximately 9:22 a.m., SIMS returned to Subject Vehicle 4 and departed the area. At approximately 9:31 a.m., BURCH departed the area.

182. At approximately 9:45 a.m., LEOs on surveillance attempted to follow Subject Vehicle 5 until they observed the vehicle make an abrupt northbound turn onto Lake Shore Drive from Lower Wacker Drive. At that time, LEOs stopped following Subject Vehicle 5 in fear of being detected by BURCH.

183. While monitoring the tracker data of Subject Vehicle 4, LEOs observed that Subject Vehicle 4 did not appear to make any stops until approximately 9:48 a.m., using a pole camera, LEOs observed Sims, driving Subject Vehicle 4, arrive to the parking behind the Cell Phone Store and then enter the red Audi parked in the same lot. Shortly after, SIMS returned to Subject Vehicle 4 and relocated to the Chicago and Trumbull drug spot.

184. Based on the intercepted calls and surveillance described above, my knowledge of the investigation and my training and experience, I believe that SIMS arranged with BURCH to resupply the Chicago and Trumbull drug spot with additional narcotics. I believe SIMS and BURCH met at the BP gas station parking lot located on the 1600 block of West Van Buren Street where BURCH provided SIMS with narcotics supplies in exchange for the narcotics proceeds referenced above in call session #6767. Additionally, following his meeting with SIMS, as LEOs on surveillance attempted to follow BURCH after he departed the gas station, I believe BURCH employed countersurveillance techniques commonly used by narcotics traffickers to avoid law enforcement detection. Further, I believe that following his meeting with BURCH, SIMS resupplied the Chicago and Trumbull drug spot with narcotics by replenishing the temporary stash location inside the red Audi parked

behind the Cell Phone Store with the narcotics he retrieved from BURCH earlier that morning.

D. Members of the SANDERS DTO Sold Narcotics at the Chicago and Trumbull Drug Spot and Other Locations on the West Side of Chicago

1. August 21, 2022 – SIMS and LOPEZ Arranged a Sale of Approximately 21.5 Grams of a Substance Containing Heroin and Fentanyl to a Confidential Source

185. On or about August 21, 2022, at approximately 11:32 a.m., a confidential source posing as a narcotics customer (“CS-2”) placed a recorded phone call to SIMS, who was using (703) 956-1576 (“Subject Phone 6”) to purchase narcotics.⁴² During the conversation, CS-2 stated, “I’m trying to grab a tray [30 zip lock bags of heroin] from you. Where you want to meet at?” SIMS replied, “Whatever close to you. Austin, right off the expressway at the gas station over there. Right off the e-way on Austin?” CS-2 stated, “That’s cool.”

186. Based on my training and experience, the training and experience of other law enforcement officers with whom I have spoken, the recorded conversation described above, and the statements of CS-2, I believe that SIMS, using Subject Phone 6, directed CS-2 to meet him at a gas station located on the 500 block of South Austin Boulevard in Oak Park, Illinois to conduct a narcotics transaction.

⁴² Law enforcement identified SIMS as the user of Subject Phone 6 based on the following: on or about August 25, 2022, at approximately 7:51 a.m., using a pole camera, law enforcement observed SIMS, carrying a small child in his arms, exit the front entrance of the residence located on the 0-100 block of West Schubert Avenue in Glendale Heights, Illinois and walk towards a blue Dodge Charger that was parked in the front driveway. At that time, a LEO placed an outgoing call to Subject Phone 6. The LEO placing the call observed on pole camera as SIMS retrieved a cell phone from the left side pocket of his pants, looked at the screen of the device, and answered the call. After a brief conversation, the LEO ended the call and observed SIMS lower the cell phone from his left ear and place the cell phone in the left side pocket of his jacket.

187. Based on the analysis of the active pen register on Subject Phone 4, used by SAMUEL LOPEZ, Subject Phone 6 and Subject Phone 4 exchanged three calls between approximately 11:34 a.m. and 12:01 p.m. At approximately 12:03 p.m., LEOs on mobile surveillance observed a Nissan sedan, driven by LOPEZ,⁴³ park in the Shell gas station parking lot located at 1 Harrison Street in Oak Park, Illinois. About four minutes later, at approximately 12:07 p.m., an undercover LEO (“UC-3”), driving with CS-2 in an undercover vehicle (“UCV”), drove to the BP gas station located at 520 South Austin Boulevard in Oak Park, Illinois, and parked.

188. Moments later, LEOs on mobile surveillance observed as CS-2 exited the UCV in the BP gas station and walked across Harrison Street to the Shell gas station parking lot, where LOPEZ’s vehicle was parked. LEOs observed as CS-2 then entered the front passenger seat of LOPEZ’s vehicle. According to CS-2, LOPEZ stated words to the effect of, “Don’t you remember me from the block?” According to CS-2, CS-2 acknowledged and confirmed the narcotics order CS-2 placed with SIMS earlier that day. According to CS-2, LOPEZ then handed CS-2 thirty zip lock bags containing suspected heroin, in exchange for \$300. LEOs then observed CS-2 exit LOPEZ’s vehicle and walk back to the UCV, where CS-2 handed the thirty zip lock bags containing suspected heroin to UC-3. After UC-3 and CS-2 drove the UCV to a different location, law enforcement searched CS-2 and found no cash, drugs or other contraband. The thirty bags were later submitted for testing and analysis to the

⁴³ Law enforcement identified Lopez based on comparison to his State of Illinois identification photograph.

Illinois State Police Laboratory. Of the thirty bags, 21 bags were tested and tested positive for heroin and fentanyl and weighed approximately 21.5 grams in total.

2. January 24, 2023 – LAVELL GRIFFIN and DEANDRE MADDOX Arranged a Narcotics Sale to a Customer.

189. On or about January 24, 2023, at approximately 8:53 a.m. (call session #4478), MADDOX placed an outgoing call on Target Phone 2 to GRIFFIN, who was using telephone number (773) 619-8807. During the conversation, MADDOX stated, “Uh, a ‘P’ [narcotics customer] down there in the middle. He wants a pack [of heroin]. He want 12 [zip lock bags] for a hundred [dollars].” GRIFFIN asked, “Who?” MADDOX stated, “In the Jeep.” GRIFFIN asked, “In a Jeep?” MADDOX replied, “Hell yeah.” GRIFFIN stated, “Aight.” MADDOX asked, “Where you at?” GRIFFIN replied, “I’m right here, in the middle [of the block of North Trumbull Avenue].” MADDOX asked, “You don’t see a black Jeep right there? A little Chinese man?” GRIFFIN asked, “He got his dog?” MADDOX stated, “It’s like the one for old people. Give him 12 bro. For the hundred [dollars].” GRIFFIN replied, “Aight.”

190. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe MADDOX instructed GRIFFIN to sell 12 zip lock bags of heroin in exchange for \$100 to an unidentified narcotics customer, who was waiting inside a Jeep.

191. Moments later, using a pole camera, LEOs observed an unidentified male exit the driver’s seat of a black Jeep parked on the 800 block of North Trumbull Avenue, approach GRIFFIN, who was on the sidewalk, and engaged in a suspected hand-to-hand narcotics transaction.

192. Based on the intercepted call and surveillance described above, my knowledge of the investigation and my training and experience, I believe MADDOX instructed GRIFFIN to sell 12 zip lock bags of heroin to an unidentified narcotics customer, who was waiting inside a Jeep, in exchange for \$100. Further, I believe GRIFFIN later sold the heroin to the customer.

3. January 25, 2023 – LAVELL GRIFFIN Told MADDOX Where His Narcotics Were Concealed

193. In summary, and as set forth in more detail below, on or about January 25, 2023, using electronic surveillance, LEOs observed GRIFFIN conceal suspected narcotics inside of a fence pole on the 800 block of North Trumbull Avenue. Following the observation, LEOs seized approximately 15 zip lock bags containing suspected heroin from inside the same fence pole LEOs observed GRIFFIN place suspected narcotics. GRIFFIN then informed MADDOX of the location where he concealed his supply of narcotics for resale.

194. More specifically, on or about January 25, 2023, at approximately 8:19 a.m., LEOs observed an unidentified male, later identified as LAVELL GRIFFIN, walking on the 800 block of North Trumbull Avenue and approach a fence line of a vacant lot located at approximately 832 North Trumbull Avenue. At that time, LEOs observed GRIFFIN place an object appeared to be suspected narcotics inside a fence pole.

195. Later that morning, at approximately 9:34 a.m., LEOs in an enforcement vehicle arrived at the 800 block of North Trumbull Avenue and walked

towards GRIFFIN who was standing outside on the same block. As LEOs exited their enforcement vehicle, GRIFFIN fled on foot and ran out of law enforcement's view.

196. At approximately 10:11 a.m., (call session #4603), MADDOX received an incoming call on Target Phone 2 from telephone number (773) 619-8807, believed to be used by GRIFFIN. During the conversation, GRIFFIN stated, "I just ran..." MADDOX asked, "What happened?" GRIFFIN replied unintelligibly. MADDOX then asked, "You say that's...they who now?" GRIFFIN replied, "I just ran...I don't know..." MADDOX stated, "Big, black businessmen [police], that's 'Farakhan' [description of one of the LEOs] or something. It's probably a trans [unmarked police vehicle]. You said it was a trans, shorty?" GRIFFIN replied, "Yeah, those." MADDOX stated, "Oh hell yeah, it's probably 'Beard' [description of the LEO] and them." GRIFFIN stated, "Yeah they talk about they want to listen to me." I ran...hell nah, boy..." MADDOX laughed and asked, "You got out of there shorty?" GRIFFIN replied, "Hell yeah..." MADDOX stated, "Fuck that. Hell, you gave it...you went with your first mind." GRIFFIN stated, "I got up out of there. I got that shit [narcotics]. I ain't chucking that shit [narcotics], boy." But that...that other pack [of narcotics], it's in that pole [fence pole]. I ain't going back out there [to the Chicago and Trumbull drug spot]." MADDOX replied, "Shit, I'm a call you when I get over there. I ain't made it over there yet." GRIFFIN stated, "Alright, it's [GRIFFIN's narcotics supply] in that pole [the fence pole]. I don't want nobody to take it." MADDOX stated, "Shit, I don't know nothing about no pole. I'm a call you when I get right there. So you can let me know." GRIFFIN replied, "So when you go in that lot [vacant lot located at

approximately 832 North Trumbull Avenue] – that straight pole right there.” Later in the conversation, GRIFFIN stated, “Hope they don’t take it though...” MADDOX replied, “They grimey like that too.”

197. Based on the conversion described above, my knowledge of the investigation and my training and experience, I believe that GRIFFIN notified MADDOX that he fled from LEOs earlier that morning and informed MADDOX of the location where he concealed his supply of narcotics.

198. Following call session #4603, at approximately 9:34 a.m., LEOs in an enforcement vehicle arrived at the area near 832 North Trumbull Avenue and observed a bent fence pole matching the description GRIFFIN provided to MADDOX in the intercepted call described above as well as law enforcement’s observations of GRIFFIN earlier that day placing an object in a fence pole. LEOs looked inside the tip of the fence pole and discovered approximately 15 zip lock bags containing suspected heroin. LEOs seized the narcotics, which field-tested positive for heroin. The 15 zip lock bags were later submitted to the Illinois State Police Laboratory for testing and analysis. Of the 15 zip lock bags, four zip lock bags tested positive for heroin and fentanyl and weighed approximately 3.4 grams in total.

199. Based on the sequence of events described above, my knowledge of the investigation and my training and experience, I believe that GRIFFIN stored his supply of heroin for resale inside the bent fence pole surround the vacant lot located on the 800 block of North Trumbull Avenue. Upon LEOs’ arrival to North Trumbull Avenue, GRIFFIN fled and successfully evaded LEOs. Additionally, I believe

GRIFFIN notified MADDOX of the incident described above and informed MADDOX where he stored his supply of narcotics. Further, LEOs later recovered the narcotics GRIFFIN stored inside the fence pole.

200. Two days later, on or about January 27, 2023, at approximately 9:30 a.m., using a pole camera, LEOs observed GRIFFIN standing on the 800 block of North Trumbull Avenue. Moments later, LEOs observed GRIFFIN engage in a suspected hand-to-hand narcotics transaction with an unidentified narcotics customer. Based on the surveillance described above, LEOs in enforcement vehicles approached GRIFFIN and placed him under arrest. During the arrest, LEOs recovered approximately six zip lock bags containing suspected heroin. Additionally, GRIFFIN provided LEOs with his State of Illinois identification card, and informed LEOs that his phone number is (773) 619-8807, the same phone number he used to contact MADDOX in call session #4603 described above. The six zip lock bags containing suspected heroin were later submitted to the Illinois State Police Laboratory for testing and analysis. The contents of the zip lock bags tested positive for heroin and fentanyl and weighed approximately 4.6 grams in total.

4. On or About February 16, 2023, TARANCE BANKS Sold a Substance Containing Heroin and Fentanyl to an Undercover Officer.

201. In summary, on or about February 16, 2023, an undercover officer posing as a narcotics customer (“UC-6”), who was equipped with audio and video recording device, approached the Chicago and Trumbull drug spot on foot and was greeted by an unidentified male (“UM-1”) who asked UC-6, “How many you need?”

UC-6 replied, "Six." UM-1 asked, "Six white tape [heroin]?" UC-6 replied, "Yeah." UM-1 then stated, "Go to the middle of the block [of North Trumbull Avenue]." Per UM-1's instruction, UC-6 walked to the middle of the block on North Trumbull Avenue and observed TARANCE BANKS sitting in the driver's seat of a white Kia SUV. BANKS asked UC-6, "What's happening?" UC-6 stated, "Hey what's up? Six [bags of heroin]." At that time, RAHEEM SMITH approached UC-6 and asked, "You want some C [crack cocaine]?" UC-6 stated, "What's up, no." BANKS stated, "Tell him to mind his business." BANKS then stated, "Six." BANKS then exited the driver's seat of the Kia SUV and removed a white pouch from the gas tank of the vehicle. BANKS then handed UC-6 six zip lock bags bound by white tape containing suspected heroin in exchange for \$60. UC-6 stated, "Six. Make sure there's six. Yeah, that's all of it. Thank you. BANKS stated, "Go walk off now." The six zip lock bags were later submitted to the Illinois State Police Laboratory for testing and analysis. Of the six bags, the content of five bags were tested and tested positive for heroin and fentanyl. The contents of the five bags tested weighed approximately 3.8 grams in total.

5. On or About February 27, 2023, DEMECCO TARTT and RAHEEM SMITH Sold a Substance Containing Heroin and Fentanyl to an Undercover Officer.

202. In summary, on or about February 27, 2023, an undercover officer posing as a narcotics customer ("UC-6"), who was equipped with audio and video recording device, approached the Chicago and Trumbull drug spot on foot and was greeted by DEMECCO TARTT, who asked UC-6, "What [narcotics] you want?" UC-6 replied, "Six." TARTT asked, "Six what?" UC-6 replied, "Soft, white tape [heroin]."

TARTT stated, "Go to the middle [of the block on North Trumbull Avenue]." TARTT then asked, "What you got, \$60?" UC-6 replied, "Yeah." TARTT stated, "Go to the middle." Per TARTT's instruction, UC-6 walked towards the middle of the block on North Trumbull Avenue and observed RAHEEM SMITH holding multiple clear zip lock bags bound with white tape containing suspected heroin. SMITH then handed UC-6 six clear zip lock bags containing suspected heroin in exchange for \$60. The six zip lock bags were later submitted to the Illinois State Police Laboratory for testing and analysis. The contents of all six zip lock bags tested positive for heroin and fentanyl and weighed approximately 4.1 grams in total.

6. On or about February 27, 2023, TYRON PAULK Sold Approximately 47.8 Grams of Heroin Mixed with Fentanyl to an Undercover Officer.

203. On or about February 27, 2023, at approximately 11:25 a.m., an undercover officer, posing as a narcotics customer ("UC4") placed an outgoing call to PAULK, who was using Target Phone 3. During the consensually recorded call, UC4 asked PAULK if he/she could purchase narcotics. UC4 stated, "What can I do for like say 500 [\$500], what can I get [amount of narcotics]." PAULK replied, "Six or some shit [60 bags of heroin]." UC-4 agreed and stated that he/she will call PAULK when he/she was close.

204. Based on the conversation described above, my knowledge of the investigation and my training and experience, I believe that PAULK informed UC-4 that he/she could purchase approximately 60 zip lock baggies of heroin for \$500.

205. A short while later, at approximately 1:49 p.m., UC-4 sent a text message to PAULK that stated, "About 10 min [minutes] away." PAULK replied via text message, "Ok." At approximately 1:52 p.m., UC-4, who was equipped with an audio and video recording device, arrived in his/her undercover vehicle (UCV) near approximately 3429 West Iowa Street. Upon arrival, UC4 observed PAULK near the intersection of West Iowa Street and North Trumbull Avenue. UC-4 and PAULK observed each other, PAULK then walked northbound on North Trumbull Avenue and out of the view of UC4. LEOs on electronic surveillance observed PAULK enter the gangway of 903 North Trumbull Avenue. A short while later, at approximately 2:03 p.m., LEOs on electronic surveillance observed PAULK exit the gangway of 903 North Trumbull Avenue and walk towards UC-4's direction, who remained parked on the 3400 block of West Iowa Street.

206. At approximately 2:04 p.m., PAULK approached the front passenger door of UC-4's UCV. PAULK asked, "500 [\$500]?" UC4 stated, "Yeah, \$500." At this time, PAULK handed UC-4 one knotted plastic bag, which LEOs later discovered to contain approximately 60 zip lock bags of suspected heroin weighing approximately 89 grams (including packaging).⁴⁴ UC-4 then handed PAULK \$500.00 and stated, "I'll see you in two weeks." UC-4 and PAULK then each departed the area. The suspected heroin field tested positive for the presence of heroin and fentanyl and was later submitted to the Illinois State Police Laboratory for testing and analysis. Of the

⁴⁴ The 60 zip lock bags were submitted to the Illinois State Police Laboratory for testing and analysis. Of the 60 zip lock bags, 30 zip lock bags tested positive for heroin and fentanyl and weighed approximately 47.8 grams in total.

60 zip lock bags, 30 zip lock bags tested positive for heroin and fentanyl and weighed approximately 47.8 grams in total.

7. On or About May 10, 2023, SHAVELLE SIMS and SAMUEL LOPEZ Arranged the Sale of Approximately 9.6 Grams of a Substance Containing Heroin and Fentanyl to an Undercover Officer.

207. On or about May 10, 2023, between approximately 10:03 a.m. and 10:06 a.m., an undercover officer posing as a narcotics customer (“UC-2”) exchanged a series of text messages with SAMUEL LOPEZ, who was using telephone number (773) 704-4529 (“Subject Phone 4”). Based on the screen capture of UC-2’s cell phone, during the text message exchange, UC-2 asked, “Hey bro can I swing through”. LOPEZ replied, “Yea.” UC-2 stated, “Cool. Be like 30 minutes.” LOPEZ replied, “What you need.” UC-2 stated, “100 [quantity of heroin valued at \$100].” LOPEZ replied, “Ok, call that other number [Target Phone 6].” Based on the exchange of text messages described above, my knowledge of the investigation and my knowledge of the investigation, I believe that UC-2 requested to purchase narcotics from LOPEZ. I further believe that LOPEZ instructed UC-2 to contact Target Phone 6 to complete the transaction.

208. At approximately 10:08 a.m. (call session #1054), UC-2 sent a text message to Target Phone 6, used by SIMS, that read, “I was texting your buddy [LOPEZ]. Can I come through for a 100?” Based on the text message described above, my knowledge of the investigation and my training and experience, I believe that UC-2 informed SIMS that he/she arranged a narcotics transaction through LOPEZ and asked SIMS if he/she can purchase a quantity of heroin valued at \$100.

209. Later that morning, at approximately 10:54 a.m. (call session #1068), UC-2 received an incoming call from SIMS, using Target Phone 6. During the conversation, SIMS stated, "Uh, you still coming [to purchase narcotics]? My phone ain't let me text you. I don't know why." UC-2 replied, "Yeah, yeah yeah yeah. I was just waiting for a text back. Uh...dude, I could probably get over there in about...30 minutes." SIMS stated, "That's cool." UC-2 replied, "I'll shoot you a text whenever I get done." SIMS stated, "No, call me. Cause my phone ain't let me text you."

210. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SIMS attempted to reply to UC-2's text message described above in call session #1054. However, according to SIMS, he was having difficulties in sending text messages to UC-2, using Target Phone 6. Therefore, SIMS later called UC-2, as described above in call session #1068. Further, I believe that UC-2 informed SIMS that he/she would meet SIMS at the Chicago and Trumbull drug spot to purchase the narcotics LOPEZ agreed to sell him/her.

211. At approximately 11:24 a.m. (call session #1071), UC-2 placed a recorded phone call to Target Phone 6. During the conversation, UC-2 stated, "Hey what's up man? Uh, I'm like uh...I'm like five minutes away." SIMS replied, "Aight." Based on the recorded and intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that UC-2 informed SIMS that he/she was approximately five minutes away from the meeting location.

212. About six minutes later, at approximately 11:30 a.m., UC-2, who was driving in an undercover vehicle (“UCV”), drove to the 3400 block of West Iowa Street. After waiting several minutes, at approximately 11:37 a.m. (call session #1078), UC-2 placed a recorded phone call to Target Phone 6. During the conversation, SIMS asked, “You right there?” UC-2 replied, “Hey bro, hey, I’m here. Uh...I only got a hundred on me today, ok?” SIMS stated, “Aight. That’s cool.” Based on the recorded and intercepted call described above, my knowledge of the investigation and my training and experience, I believe that UC-2 informed SIMS that he/she was at the meeting location and had \$100 to purchase heroin.

213. Less than a minute later, (call session #1079), SIMS placed an outgoing call on Target Phone 6 to Individual B, who was using telephone number (872) 289-1134.⁴⁵ During the conversation, SIMS stated, “He [UC-2] right there, Mo. He in that gray little car [UC-2’s UCV].” Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that SIMS directed Individual B to conduct the narcotics transaction with UC-2.

214. At about the same time as call session #1079 describe above, UC-2 observed Individual B standing near the intersection on North Trumbull Avenue and West Iowa Street, look towards UC-2’s direction and hold up his finger signaling UC-

⁴⁵ Law enforcement identified Individual B as the user of telephone number (872) 289-1134 based on the following: on or about May 11, 2023, at approximately 4:51 p.m., using a POD camera, LEOs observed Individual B walking near the intersection of West Chicago Avenue and North Trumbull Avenue. At that time, a LEO placed a ruse call to telephone number (872) 289-1134 and during that time, LEOs observed on POD camera as Individual B looked at the screen of a cell phone in his hand. Shortly after, Individual B placed the cell phone towards his ear and answered, “Hello?” The LEO asked to speak to “Nicky” and Individual B replied that he is not Nicky. The LEO then disconnected the call.

2 to wait. Individual B then walked southbound on North Trumbull Avenue out of law enforcement's view.

215. At approximately 11:40 a.m., UC-2 observed Individual B walking northbound on North Trumbull Avenue towards West Iowa Street. Individual B then waved to UC-2, who was parked in the middle of the 3400 block of West Iowa Street, signaling him/her to drive closer the intersection. UC-2 then drove towards the intersection where Individual B was standing, and at that time, Individual B reached into the driver's side window of the UCV and handed UC-2 approximately 12 zip lock bags containing suspected heroin in exchange for \$100.⁴⁶ Following the transaction, UC-2 departed the area driving the UCV.

8. On or about May 13, 2023, DELAWRENCE ISON Sold Approximately 33.3 Grams of a Substance Containing Heroin and Fentanyl to an Undercover Officer.

216. On or about May 12, 2023, at approximately 4:19 p.m., an undercover officer posing as a narcotics customer ("UC6") placed a recorded call to ISON, who was using telephone number (312) 919-9206 ("Subject Phone 19").⁴⁷ During the

⁴⁶ The 12 zip lock bags containing suspected heroin were later submitted to the Illinois State Police Laboratory for testing and analysis. Of the 12 zip lock bags, the contents of seven zip lock bags were tested and tested positive for heroin and fentanyl and weighed approximately 5.6 grams. The weight of the contents of the five zip lock bags that were not tested was approximately 4.0 grams.

⁴⁷ Law enforcement identified ISON as the user of Subject Phone 19 based on the following: on or about February 4, 2023, at approximately 1:43 p.m., using a City of Chicago Police Observation Device ("POD") camera, LEOs observed an unidentified male [who was later identified as ISON] wearing a red coat standing at approximately 117 South Homan Avenue. At that time, a LEO placed an outgoing phone call to Subject Phone 19. LEOs observed on POD camera as ISON retrieve a cell phone on his person and answer the call. After a brief conversation, the LEO disconnected the call, and LEOs observed ISON lower the cell phone from his ear. Law enforcement further identified ISON based on the following: On or about February 5, 2023, at approximately 1:11 p.m., CPD officers conducted an investigatory stop of ISON DELAWRENCE who was wearing a red coat, and standing next to a red Chevrolet Cruze, bearing Illinois license plate CX77667, parked at

conversation, UC6 asked, "Yeah, is 'Q' [ISON] there?" ISON replied, "Yeah, this me. Whattup?" UC6 stated, "Not too much. You gonna be around tomorrow?" ISON replied, "Yeah." UC6 stated, "In the morning um...I was looking to do three [packs of heroin]." ISON replied, "Yeah I got you." UC6 stated, "Alright, um...I'll give you a call when I get near you like I did last time. ISON replied, "Aight, that's cool, aight."

217. On the next day, at approximately 8:36 a.m., UC6 received an incoming call from ISON, who was using Subject Phone 19. During the recorded conversation, UC6 stated, "Yeah, I'm not far. Probably another like ten of fifteen minutes I'll be by you. I'm gonna like the same way. What's that street? Not the busy one but the other one I met you by the last time? ISON stated, "I don't know. [inaudible]." According to UC6, ISON directed him/her to meet him in the middle of the block on North Trumbull Avenue. UC6 replied, "Alright. Yeah, give me about like I said ten fifteen minutes. Cool?" ISON replied, "Aight."

218. At approximately 9:03 a.m., UC6, who was equipped with an audio and video recording device, walked near the intersection of West Iowa Street and North Trumbull Avenue. At that time, UC6 received an incoming call from ISON, who was using Subject Phone 19. During the recorded conversation, UC6 stated, "Yeah, I'm here. I'm on that Iowa [street]. Iowa and Trumbull I'm at right now. I'm walking towards you." ISON replied, "Aight, meet me in the middle [of North Trumbull Avenue]."

approximately 117 South Homan Avenue. During the investigative stop, ISON DELAWRENCE provided CPD officers with his State of Illinois Identification.

219. About a minute later, UC6 walked northbound on the 800 block of North Trumbull Avenue and based on LEOs' review of UC6's audio and video recording and according to UC6, as UC6 walked towards ISON, ISON bent over next to a motorbike that was leaning against a fence and dug into the dirt ground near the fence. ISON retrieved a handful of small zip lock bags from the ground and at that time, approached UC6. During their interaction, UC6 asked, "What's up? How many is there?" ISON replied, "Three [packs of heroin]." UC6 stated, "Perfect." At that time, ISON handed UC6 approximately 45 small zip lock bags containing suspected heroin and in exchange, UC6 handed ISON \$300 in U.S. currency.⁴⁸ While ISON appeared to count the money UC6 provided him, ISON stated, "Aight." UC6 asked, "We good?" ISON replied, "Yeah." UC6 stated, "Thank you." At that time, UC6 departed the area on foot.

220. Based on the sequence of events described above, my knowledge of the investigation and my training and experience, I believe that ISON agreed to sell UC6 three packs of heroin at the 800 block of North Trumbull Avenue. Additionally, I believe that ISON retrieved the narcotics from a stash location near the motorbike that was leaning next the fence and handed UC6 45 zip lock bags containing suspected heroin in exchange for \$300.

⁴⁸ The 45 zip lock bags were later submitted to the Illinois State Police Laboratory for testing and analysis. Of the 45 zip lock bags, the contents of approximately 23 zip lock bags were tested and tested positive for heroin and fentanyl and weighed approximately 33.3 grams in total.

9. On or about June 5, 2023, SAMUEL LOPEZ and SHAVELLE SIMS Arranged a Narcotics Sale.

221. On or about June 5, 2023, at approximately 6:19 p.m. (call session #3849), SIMS received an incoming call on Target Phone 6 from LOPEZ, who was using (773) 704-4529 (“Subject Phone 4”). During the conversation, SIMS stated, “Yup.” LOPEZ stated, “[Unintelligible] pulling up there. ‘Shay’ [an unidentified narcotics customer] finna pull up there on Iowa [Street] from [unintelligible].” SIMS stated, “[Unintelligible] know when she down there.” LOPEZ stated, “Aight.” Based on the intercepted call described above, my knowledge of the investigation, my training and experience, I believe that LOPEZ informed SIMS that a narcotics customer was arriving to the Chicago and Trumbull drug spot to purchase narcotics. SIMS instructed LOPEZ to notify him when the customer arrived.

222. About five minutes later, at approximately 6:24 p.m. (call session #3851), SIMS received an incoming call on Target Phone 6 from LOPEZ, who was using Subject Phone 4. During the conversation, SIMS stated, “Hello. She right there.” LOPEZ stated, “[Unintelligible], yup.” SIMS stated, “Aight.” LOPEZ stated, “Aight.” Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that LOPEZ notified SIMS that the narcotics customer arrived to a predetermined meeting location near the Chicago and Trumbull drug spot.

VII. CONCLUSION

223. Based on the foregoing, I respectfully submit that there is probable cause to believe that: (1) beginning no later than in or about May 2022, and continuing

until the present, SANDERS, SIMS, PAULK, LOPEZ, TARTT, BANKS, MADDOX, ISON, GRIFFIN, WILLIAMS, and SMITH conspired to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), in violation of Title 21, United States Code, Section 846; (2) on or about March 9, 2023, PAULK did knowingly possess a firearm, namely, a loaded Glock 43x 9mm pistol bearing serial number BWCB012, with an extended magazine, and a loaded Ruger LCP II 9mm pistol bearing serial number 380800857, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); (3) on or about April 1, 2023, BURCH did knowingly possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); (4) on or about June 4, 2023, SANDERS did knowingly use, carry, and discharge a firearm in furtherance of a drug trafficking

crime for which he may be prosecuted in a court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii); (5) on or about June 5, 2023, SANDERS did knowingly possess a firearm, namely, a model FN 509 9 millimeter pistol, bearing serial number GKS0224379, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); (6) on or about June 6, 2023, SMITH did knowingly possess a firearm, namely, a loaded model FN 509 9 millimeter pistol, bearing serial number GKS0224379, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a Court of the United States, namely, conspiracy to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); and (7) on or about June 16, 2023, HILL did knowingly possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-

(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.



CHUNG KIM
Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone June 26, 2023.



Honorable HEATHER K. MCSHAIN
United States Magistrate Judge