
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RONALD JOHNSON,
also known as "Lil' Ron,"
SULSTINE BROWN ROBINSON,
also known as "Tina,"
CHARLES LAWRENCE,
DARRELL JONES, and
TROY BONAPARTE,
also known as "Magnificent"

CASE NUMBER: 23 CR 412

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

From in or around August 2022, and continuing to in or around May 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant(s) JOHNSON, BROWN ROBINSON, LAWRENCE, and JONES violated:

Code Section

Title 21, United States Code, Sections 841(a) and 846

Offense Description

did conspire with others known and unknown, to knowingly and intentionally to distribute, and to possess with intent to distribute, a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance

Count Two

On or about December 5, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, defendant(s) BONAPARTE violated:

Code Section

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

Offense Description

did knowingly and intentionally 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, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance

Count Three

On or about January 24, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant(s) JOHNSON and BROWN ROBINSON violated:

Code Section

Title 18, United States Code, Section 1952; Title 18, United States Code, Section 2

Offense Description

did travel in interstate commerce between the Northern District of Illinois and Wisconsin, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity, namely, conspiracy to distribute, and to possess with intent to distribute, a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, as charged in Count One of this Complaint, and thereafter did perform or attempt to perform an act to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of that unlawful activity

Count Four

On or about April 14, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant(s) LAWRENCE violated:

Code Section

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

Offense Description

did knowingly possess a firearm, namely, a loaded Taurus G3 9mm semi-automatic handgun, bearing serial number ABE531937, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute, and to possess with intent to distribute, a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, as charged in Count One of this Complaint

Count Five

On or about May 2, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant(s) JOHNSON and JONES violated:

Code Section

Title 18, United States Code, Section 1952; Title 18, United States Code, Section 2

Offense Description

did travel in interstate commerce between the Northern District of Illinois and Indiana, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity, namely, conspiracy to distribute, and to possess with intent to distribute, a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, as charged in Count One of this Complaint, and thereafter did perform or attempt to perform an act to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of that unlawful activity

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Michael Lee

MICHAEL D. LEE

Special Agent, Federal Bureau of Investigation
(FBI)

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: July 25, 2023

City and state: Chicago, Illinois

Judge's signature

YOUNG B. KIM, Chief U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, MICHAEL D. LEE, being duly sworn, state as follows:

I. INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since approximately May 2019. I am currently assigned to the FBI Chicago Field Division.

2. My responsibilities as an FBI Special Agent include the investigation of violent crimes, criminal enterprises, violations relating to the illegal sale and transfer of drugs and firearms, and violent criminal acts in furtherance of criminal enterprises. In addition, my official FBI duties include the investigation of drug-trafficking organizations and violations of federal drugs and money laundering laws, including offenses defined by 21 U.S.C. §§ 841, 843, and 846, and 18 U.S.C. § 1956. I have received training in the means and methods by which individuals and drug-trafficking organizations conduct their illegal drug-trafficking activities, as well as in the use of various investigative techniques used to uncover unlawful drug trafficking. 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 verbal and written code to conduct their transactions, their methods for concealing drugs and drug proceeds, and their use of violence and threats of

violence to protect their organization. Further, I have participated in a prior investigation involving Title III court-authorized wiretaps.

3. Through these investigations, my training and experience, and conversations with other law enforcement officers (“LEOs”), I have become familiar with the methods used by drug traffickers to distribute, transport, store, and import controlled substances. I also have become familiar with the methods used by drug traffickers to safeguard and distribute drugs and to collect and launder drug proceeds. For example, I am familiar with their use of prepaid cellular and cellular phones, landline phones, public phones, debit calling cards, counter-surveillance, the use of false and/or fictitious identities, and the use of coded language during conversations when referring to drugs in an attempt to disguise the true meaning of the conversation. I also know that consensually monitored telephone calls, as well as court-authorized intercepts, often provide valuable evidence of conspiracy pertaining to the drugs trafficking activities.

4. I am personally involved in the investigation of the offenses discussed below and am familiar with the investigative methods described herein. The statements contained in this Affidavit are based on my knowledge and, in part, information provided by LEOs, including: (a) oral and written reports that I have received directly or indirectly from other LEOs; (b) results of physical surveillance conducted by myself and/or other LEOs, which have been reported to me either directly or indirectly; (c) information provided by confidential sources working for the FBI; (d) a review of telephone-toll records, pen-register records, and subscriber

information; (e) information derived from consensually recorded telephone conversations and meetings; (f) communications intercepted pursuant to a court-authorized Title III wiretap order; (g) review of driver's license, state identification, and automobile-registration records; (h) records obtained from law-enforcement databases; (i) review of information obtained through open sources; (j) my training and experience as an FBI Special Agent; and (k) the training and experience of other LEOs involved in this investigation.

5. This affidavit is submitted in support of a criminal complaint alleging that the following individuals have committed the following criminal offenses (the **"Subject Offenses"**):

a. Ronald Johnson, also known as "Lil' Ron" ("JOHNSON"); Sulstine Brown Robinson, also known as "Tina" ("BROWN ROBINSON"); Charles Lawrence ("LAWRENCE"); and Darrell Jones ("JONES") conspired to distribute, and to possess with intent to distribute, controlled substances, in violation of Title 21, United States Code, Sections 841(a) and 846, as alleged in Count One of this complaint;

b. Troy Bonaparte, also known as "Magnificent" ("BONAPARTE") possessed with intent to distribute a quantity of cocaine and a quantity of marijuana, in violation of Title 21, United States Code, Section 841(a), as alleged in Count Two;

c. JOHNSON and BROWN ROBINSON traveled in interstate commerce to promote or facilitate unlawful activity, in violation of Title 18, United States Code, Sections 1952 and 2, as alleged in Count Three;

d. LAWRENCE possessed a firearm in furtherance of a drug-trafficking crime, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), as alleged in Count Four; and

e. JOHNSON and JONES traveled in interstate commerce to promote or facilitate unlawful activity, in violation of Title 18, United States Code, Sections 1952 and 2, as alleged in Count Five.

6. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging JOHNSON, BROWN ROBINSON, LAWRENCE, JONES, and BONAPARTE with the **Subject Offenses**, as specified above, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that each defendant committed the offenses alleged against him or her in the complaint.

II. SUMMARY OF PROBABLE CAUSE

7. The FBI is conducting a criminal investigation of JOHNSON and others known and unknown regarding the **Subject Offenses**. During the government's investigation, a confidential informant ("CI-4")¹ advised the FBI that JOHNSON is a

¹ Following CI-4's traffic stop on or about May 25, 2022, when FBI TFOs seized about 68.7 grams of crack cocaine from CI-4's person, CI-4 agreed to cooperate with the Chicago Police Department. CI-4 was not made aware of the government's broader pending investigation into CI-4 and others known and unknown; as a result, I believe CI-4 understood that any benefit received as a result of CI-4's cooperation would go toward CI-4's May 25, 2022, drug offense. During a subsequent follow-up meeting on or about June 22, 2022, CI-4 met with FBI investigators at a pre-arranged location and agreed to cooperate with law enforcement. During that meeting, CI-4 was advised by agents that no guarantees or promises of leniency in any pending criminal cases could be made. To date, CI-4 has been paid approximately \$4,600 for information, controlled drug purchases that CI-4 conducted with another subject

large-scale supplier for multiple types of drugs, including cocaine and marijuana. At the direction of the FBI, CI-4 made controlled drug purchases from JOHNSON on or about August 12, August 26, September 8, and September 22, 2022, each time for approximately 64 grams of cocaine. In arranging those transactions, JOHNSON used phone number 312-XXX-9566 (hereafter, “**Target Phone 4**”) to communicate with CI-4.

8. Communications intercepted over **Target Phone 4** and 773-XXX-9160 (**Target Phone 5**), both used by JOHNSON, pursuant to court-authorized Title III wiretap orders (detailed in Section III(E), below) establish that JOHNSON has been running a drug-trafficking operation with other co-conspirators, including BROWN ROBINSON, LAWRENCE, and JONES. Information identifying JOHNSON as the user of **Target Phone 4** and **Target Phone 5** is detailed further below at Section III(B) and footnotes 9–10. Further, ongoing surveillance, intercepted communications, and law enforcement’s seizures of drugs and drug-related proceeds from co-conspirators have collectively revealed that JOHNSON’s drug-trafficking organization (“DTO”) used an apartment unit located at 937 East 42nd Place, Chicago

of this investigation, and identification of additional subjects. Further, information provided by CI-4 has been corroborated through other means, including the use of audio-video recording devices, as further described herein, and I believe that the information provided by CI-4 has been credible and reliable.

CI-4 has approximately five convictions, including for manufacture or delivery of controlled substances, aggravated discharge of a firearm, and aggravated assault. Further, based on the government’s investigation preceding CI-4’s May 2022 traffic stop, which resulted in CI-4’s cooperation, the government is aware that CI-4 is suspected of engaging in as-yet uncharged: (1) drug-trafficking activity involving the possession and sale of controlled substances; (2) efforts to procure firearms illegally; and (3) a suspected bank-fraud scheme.

(the “East 42nd Place Premises”) as a drug stash location. Select communications between JOHNSON and other parties intercepted pursuant to court-authorized Title III wiretap orders are summarized below, which establish that JOHNSON, BROWN ROBINSON, LAWRENCE, and JONES are engaged in ongoing drug-trafficking activities with other named and unnamed co-conspirators, as is relevant to Count One.

9. Further, intercepted communications, surveillance, and seizures by law enforcement establish that: (1) on or about December 5, 2022, BONAPARTE possessed with intent to distribute a quantity of cocaine and marijuana, as alleged in Count Two; (2) on or about January 24, 2023, JOHNSON provided BROWN ROBINSON approximately 7 kilograms of suspected cocaine, which was seized from BROWN ROBINSON’s vehicle while she was enroute to a destination outside Illinois, as alleged in Count Three; (3) on or about April 14, 2023, while transporting approximately \$26,400 in cash drug proceeds that JOHNSON had provided him for delivery to a third party, LAWRENCE possessed a loaded Taurus firearm, as alleged in Count Four; and (4) on or about May 2, 2023, JONES traveled in interstate commerce while transporting approximately \$63,730 in cash drug proceeds that JOHNSON had provided him for delivery to a third party (Individual B) in Ohio, as alleged in Count Five.²

² Some of the consensually recorded conversations and court-authorized interceptions from this investigation are summarized in this Affidavit. The language that is quoted from the recorded conversations throughout this Affidavit is based upon a preliminary review of the recorded conversations, not final transcripts. These summaries do not include all statements or topics covered during the course of the recorded conversations. At various points in the Affidavit, I have indicated (sometimes in brackets) my interpretation of words and phrases

III. STATEMENT OF PROBABLE CAUSE

A. CONTROLLED PURCHASES OF COCAINE FROM JOHNSON BETWEEN AUGUST AND SEPTEMBER 2022

1. August 12, 2022 Controlled Drug Purchase

10. On or about August 11, 2022, at approximately 1:47 p.m., JOHNSON, who was using **Target Phone 4**, had a consensually recorded telephone conversation with CI-4.³ During the conversation, CI-4 said to JOHNSON, “I wanna holler at you on another note too though. On the um... I know... you be still f*cking around?” JOHNSON replied, “I have to see you. What you... you know I’m I’m finna come to the city now.” CI-4 later asked, “What, I gotta come get next to you or som’n?” JOHNSON then replied, “yeah.”

a. Based on my training, experience, knowledge of this investigation, and debriefs of CI-4, I believe that in this call, CI-4 was arranging to meet with JOHNSON in reference to a sale of a quantity of crack cocaine to CI-4. Based on my training and experience, and debriefs of CI-4, I believe that when CI-4

used in the recorded conversations. My interpretations are based on information received from CI-4 and other sources, the contents and context of the recorded conversations, events that took place before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

³ Information identifying JOHNSON as the user of **Target Phone 4** in this affidavit is set forth at footnote 9, below. Further, conversations between CI-4 and **Target Phone 4**, as described in this affidavit, were verified through the following means: CI-4’s consensually recorded telephone conversations between CI-4 and **Target Phone 4** were captured by means available to the FBI. This referenced means of capturing recorded communications documents the telephone numbers involved in the communications, the audible content of the communications, and the time and dates of the communications. By using these means, law enforcement was able to verify all consensually recorded communications between CI-4 and **Target Phone 4** documented in this affidavit, unless otherwise noted.

referred to JOHNSON “f*cking around,” CI-4 was inquiring, in code, about whether or not JOHNSON is involved in illegal drug sales. I believe that when JOHNSON responded “I have to see you,” that JOHNSON was communicating that he wanted to meet CI-4 in person in order to discuss the drug sale. Further, I believe that when CI-4 asked JOHNSON, “What, I gotta come get next to you or som’n,” CI-4 was asking JOHNSON if CI-4 would have to meet JOHNSON in person to discuss drug sales. I also believe that when JOHNSON responded, “yeah,” JOHNSON was confirming that CI-4 would have to meet him in person to discuss a drug sale.

11. On or about August 12, 2022, at approximately 11:34 a.m., JOHNSON, who was using **Target Phone 4**, had a consensually recorded telephone conversation with CI-4. During this conversation, JOHNSON said, among other things, “You probably gotta meet me on 43rd and Ellis.”

12. On or about August 12, 2022, at approximately 3:36 p.m., JOHNSON, who was using **Target Phone 4**, had a conversation with CI-4. Prior to the call, law enforcement met with CI-4 at a predetermined location, equipped CI-4 with audio/video recording devices, and provided CI-4 approximately \$2,000 in cash, in preparation for a potential controlled drug purchase between CI-4 and JOHNSON. Law enforcement searched CI-4 and his vehicle, and confirmed CI-4 had no narcotics, contraband, firearms, or excess currency. While CI-4 was enroute to meet JOHNSON in the proximity of the East 43rd Street and South Ellis Avenue intersection, as captured by CI-4’s recording equipment, CI-4 spoke with JOHNSON, who was using **Target Phone 4**. In response to CI-4 informing JOHNSON that CI-4 was enroute to

the agreed upon meeting location, JOHNSON stated, “When you get to Ellis – on 43rd and Ellis, just park right there.” JOHNSON continued by informing CI-4, “Stay on the main street though. Stay on 43rd.” Law enforcement concurrently established surveillance at or near the intersection of East 43rd Street and South Ellis Avenue.

13. Based on my training and experience, knowledge of this investigation, personal observations and surveillance, conversations with other agents and task force officers who provided surveillance during this controlled purchase, a debrief of CI-4, and my review of the footage captured by CI-4’s audio-video recording device, I know the following about CI-4’s controlled purchase on or about August 12, 2022:

a. As captured on CI-4’s recording equipment, at approximately 3:40 p.m., CI-4 arrived in the proximity of the East 43rd Street and South Ellis Avenue intersection in Chicago. After CI-4 parked his/her vehicle, and as captured by his/her recording equipment and observed by surveilling officers, CI-4 exited the vehicle, and entered a white Chevrolet truck (bearing Illinois license plate 2781937B) that was parked on East 43rd Street, in which JOHNSON was the only occupant and in the driver’s seat.⁴ Inside JOHNSON’s car, as captured by his/her recording equipment, CI-4 asked JOHNSON, “how much I owe you?” JOHNSON replied, “18.” JOHNSON then stated, “[R]un in the gym right quick. We’ll go right in here. I put it in there

⁴ An NCIC inquiry of the observed vehicle’s license plate established Ronald Johnson (on the 1100 block of James Peter Court, in Darien, Illinois) was the registered owner of the vehicle. Further, JOHNSON was identified by surveillance officers’ comparison of the person they observed in the white Chevrolet truck against JOHNSON’s driver’s license photograph, as well as a debriefs with CI-4 following the controlled purchases described in this affidavit, who confirmed each time that JOHNSON—based on an unmarked driver’s license photograph of him—was the person from whom CI-4 purchased drugs.

because I was like sh*t, I got to roll.” CI-4, while counting money to separate “two bucks,” counted the money out loud, stating “40, 60, 80,” and so on. As CI-4 and JOHNSON entered a building unit that displayed the decals “Health Over Wealth” (located at or about 1007 East 43rd Street, hereafter, “the Gym”), which was captured by his/her recording equipment and observed by surveilling agents. CI-4 mentioned, “my little homie be out of town. He be going crazy with the um... with the ‘fetty.” CI-4 continued, “I was trying to see if... if sh*t we could get a hold of something.” Later, while in the gym, JOHNSON—as captured by CI-4’s recording equipment—stated, “I’m – I’mma uh about to get you a little piece.” CI-4 replied, “okay cool!” As CI-4 and JOHNSON exited the gym, CI-4 relayed, “hit you Big Bro. Whenever you get a chance, I’ll come meet you and grab it from you.”

i. Based on my training, experience, and knowledge of this investigation, I believe that when CI-4 asked JOHNSON “how much I owe you?” he was referring to the price for the purchase of crack cocaine. Further, I believe that when JOHNSON told CI-4 “18,” he was referring to the amount of approximately \$1,800. When JOHNSON replied, “run in the gym right quick. We’ll go right in here,” JOHNSON was referring to the building that surveillance had observed JOHNSON and CI-4 enter together. When JOHNSON mentioned “I put it in there because I got to roll,” I believe JOHNSON is referring to storing the crack cocaine that CI-4 later purchased from JOHNSON inside the Gym.⁵ When CI-4 was heard counting out loud

⁵ During FBI Special Agent’s debrief of CI-4, following the controlled drug purchase on or about August 12, 2022, CI-4 advised that JOHNSON retrieved the crack cocaine from a jacket that was located inside of the gym, which was not depicted visually on the recording. Special

“40, 60, 80,” I believe CI-4 was counting the difference of the “two bucks” (meaning \$200) between the purchase price of \$1,800 quoted by JOHNSON and the approximately \$2,000 that were provided by Special Agents. When CI-4 made the statements, “my little homie be out of town. He be going crazy with the um... with the “fetty,” and “I was trying to see if... if sh*t we could get a hold of something,” I believe CI-4 was asking JOHNSON if JOHNSON could provide CI-4 with “fetty” (coded language for fentanyl), which law enforcement had directed CI-4 to request. When JOHNSON stated, “I’m – I’mma uh about to get you a little piece,” I believe JOHNSON was informing CI-4 that JOHNSON would provide CI-4 with an undetermined amount of fentanyl.

14. Following the controlled purchase, CI-4 met with FBI agents at a predetermined location, where agents again searched CI-4 and his/her vehicle, and confirmed CI-4 had no narcotics, contraband, firearms, or excess currency. CI-4 then provided agents with a plastic bag containing a powdery substance, which CI-4 had earlier received from JOHNSON, with a field weight of approximately 66.3 grams. CI-4 also returned approximately \$200 to the FBI (the balance of the funds agents had provided CI-4, less the approximately \$1,800 used for the controlled purchase). Unless otherwise noted, CI-4’s movements from his/her departure from the predetermined location preceding the controlled purchase, until his/her return to the predetermined location, where agents took custody of the drugs that CI-4 obtained

Agents believe the gym to be the same location that FBI surveillance observed JOHNSON and CI-4 enter together.

from JOHNSON, were documented by surveilling officers and/or by CI-4's audio-video recording equipment. Later, agents submitted the suspected drugs to the Drug Enforcement Administration's North Central Laboratory (DEA Lab) for analysis. According to the lab results, the powdery substance—which the DEA Lab determined weighed approximately 62.9 grams—tested positive for the presence of cocaine.

2. August 26, 2022 Controlled Drug Purchase

15. On or about August 26, 2022, at approximately 8:29 a.m., JOHNSON, who was using **Target Phone 4**, had a consensually recorded telephone conversation with CI-4. During the conversation, CI-4 said to JOHNSON, "Think I can bump into you around eleven; noon or som'n?" JOHNSON replied, "yeah, I'll be at the gym." CI-4 later stated, "I'm trying to jump on... you know... 63rd." JOHNSON then responded, "ok."

a. Based on my training, experience, and knowledge of this investigation, debriefs of CI-4, I believe that in this call, CI-4 was arranging to meet with JOHNSON in reference to an exchange of a quantity of crack cocaine. Based on my training and experience, and debriefs of CI-4, I believe that when CI-4 asked JOHNSON "Think I can bump into you around eleven; noon or som'n?," CI-4 was inquiring about whether or not JOHNSON could meet CI-4 for a drug sale. I believe that when JOHNSON responded "yeah, I'll be at the gym," JOHNSON was agreeing to meet CI-4 for a drug sale at the "gym." I also believe that the "gym" was JOHNSON's reference to the location in which the August 12, 2022 controlled drug purchase had taken place. Further, I believe that when CI-4 stated, "I'm trying to

jump on... you know... 63rd,” CI-4 was using coded language to inform JOHNSON that CI-4 wanted to meet with JOHNSON for the purpose of purchasing approximately 63 grams of crack cocaine. I also believe that when JOHNSON responded, “ok,” that JOHNSON was agreeing to meet CI-4 for the discussed drug sale.

16. On or about August 26, 2022, prior to the planned meeting between CI-4 and JOHNSON, law enforcement met with CI-4 at a predetermined location, equipped CI-4 with audio-video recording device, and provided CI-4 approximately \$2,000 in cash, in preparation for a potential controlled drug purchase between CI-4 and JOHNSON. Law enforcement searched CI-4 and CI-4’s vehicle, and confirmed he had no narcotics, contraband, firearms, or excess currency.

17. Based on my training and experience, knowledge of this investigation, personal observations and surveillance, conversations with other agents and task force officers who provided surveillance during this controlled purchase, a debrief with CI-4, and my review of the footage captured by CI-4’s audio-video recording device, I know the following about CI-4’s controlled purchase on or about August 26, 2022:

a. At approximately 11:17 a.m., surveilling officers observed JOHNSON arrive at or about “Norman’s Bistro,” located at 1001 East 43rd Street near South Ellis Avenue, in a three-wheeled vehicle. As captured on CI-4’s recording equipment, at approximately 11:18 a.m., CI-4 arrived in the area of East 43rd Street and South Ellis Avenue. As captured by his/her recording equipment and observed

by surveilling officers, CI-4 then parked, exited CI-4's vehicle, and approached JOHNSON's three-wheeled vehicle, before entering JOHNSON's vehicle. According to his/her recording equipment, CI-4 then said, "I had went to the bank... 200 over. What you been doing? How you been feeling?" JOHNSON replied, "man sh*t working hard, boy." Later, CI-4 asked JOHNSON to give him/her "a sample on the 'what's it name' because my little homie steady calling me for that sh*t." JOHNSON replied, "okay!"

i. Based on my training, experience, and knowledge of this investigation, I believe that when CI-4 said, "I had went to the bank... 200 over," CI-4 was referring to getting the money for the controlled drug purchase for the crack cocaine from JOHNSON, noting that CI-4 had approximately \$2,000, *i.e.*, \$200 more than the purchase price contemplated for the drug transaction. Further, I believe that when CI-4 asked JOHNSON for "a sample on the 'what's it name' because my little homie steady calling me for that sh*t," I believe "what's it name" was a coded reference to fentanyl.⁶ When JOHNSON replied, "okay!", I believe JOHNSON was agreeing to provide CI-4 with a sample of fentanyl. According to CI-4, while they were still inside JOHNSON's vehicle, JOHNSON handed CI-4 approximately 63 grams of suspected drugs (later confirmed to contain cocaine), and CI-4 handed JOHNSON approximately \$1,800.

⁶ Fentanyl or "fetty" was mentioned by CI-4 in a similar fashion during the previous controlled drug purchase on or about August 12, 2022 with JOHNSON, detailed above.

18. Following the controlled purchase, CI-4 met with FBI agents at a predetermined location, where agents again searched CI-4 and his/her vehicle, and confirmed CI-4 had no narcotics, contraband, firearms, or excess currency. CI-4 then provided agents with a plastic bag containing a powdery substance, which CI-4 had earlier received from JOHNSON, with a field weight of approximately 63.7 grams. CI-4 also returned approximately \$200 to the FBI (the balance of the funds agents had provided CI-4, less the approximately \$1,800 used for the controlled purchase). Unless otherwise noted, CI-4's movements from his/her departure from the predetermined location preceding the controlled purchase, until his/her return to the predetermined location, where agents took custody of the drugs that CI-4 obtained from JOHNSON, were documented by surveilling officers and/or by CI-4's audio-video recording equipment. Later, agents submitted the suspected drugs to the DEA Lab for analysis. According to the lab results, the powdery substance—which the DEA Lab determined weighed approximately 62.9 grams—tested positive for the presence of cocaine.

3. September 8, 2022 Controlled Drug Purchase

19. On or about September 8, 2022, at approximately 12:04 p.m., JOHNSON, who was using **Target Phone 4**, had a consensually recorded telephone conversation with CI-4. During the conversation, CI-4 said to JOHNSON, "You think I can bump into you in the next like... like... like 30-40 minutes?" JOHNSON replied, "yeah, but uh... let's see. I'll be there at like 1:30." CI-4 later stated, "Ok cool."

a. Based on my training and experience, and debriefs of CI-4, I believe that when CI-4 asked JOHNSON “You think I can bump into you in the next like... like... like 30-40 minutes?,” CI-4 was inquiring about whether or not JOHNSON could meet CI-4 for a drug sale. I believe that when JOHNSON responded “yeah, but uh... let’s see. I’ll be there at like 1:30,” JOHNSON was agreeing to meet CI-4 for a drug sale at 1:30 p.m.

25. On or about September 8, 2022, prior to the planned meeting between CI-4 and JOHNSON, law enforcement met with CI-4 at a predetermined location. While searching CI-4 and CI-4’s vehicle, law enforcement located a small amount (approximately 8 grams) of suspected marijuana within CI-4’s vehicle. The suspected marijuana was seized, and CI-4 was admonished following the seizure that marijuana was a federally controlled substance, regardless of what Illinois state laws regulating marijuana may provide. CI-4 did not provide law enforcement with any explanation as to why CI-4 was in possession of marijuana on this occasion, but, as noted in this affidavit, this is the only controlled purchase during which unauthorized marijuana (or any contraband) was seized from CI-4 preceding the transaction.⁷ Aside from the seizure of suspected marijuana, law enforcement confirmed CI-4 had no narcotics, contraband, firearms, or excess currency. Law enforcement also equipped CI-4 with

⁷ During a subsequent debrief with law enforcement on or about November 8, 2022, CI-4 confirmed that s/he had not consumed marijuana, and was not under the influence, preceding the controlled purchase with JOHNSON on or about September 8, 2022. CI-4 was also asked, and confirmed, that s/he had not consumed marijuana, and was not under the influence, preceding any of the other controlled purchases discussed in this affidavit.

an audio-video recording device and provided CI-4 approximately \$2,000 in cash, in preparation for a potential controlled drug purchase between CI-4 and JOHNSON.

26. Based on my training and experience, knowledge of this investigation, personal observations and surveillance, conversations with other agents and task force officers who provided surveillance during this controlled purchase, law enforcement's conversations with CI-4, and my review of the footage captured by CI-4's audio-video recording device, I know the following about CI-4's controlled purchase on or about September 8, 2022:

a. At approximately 2:00 p.m., surveilling officers observed JOHNSON arrive at or about the East 42nd Place Premises in a white Chevy Silverado.⁸ Approximately five minutes later, as captured on CI-4's recording equipment and observed by surveilling officers, CI-4 arrived in the area of East 43rd Street and South Ellis Ave in Chicago. Surveilling officers then observed JOHNSON exit the East 42nd Place Premises, enter and drive the white Chevy Silverado a short distance, and park behind CI-4's vehicle, before JOHNSON entered CI-4's vehicle.

⁸ The white Chevrolet Silverado that was observed bore the Illinois Chicago Bears License Specialty Plate: 6063BD. Agents received a Reclassification of License Plate application from the Illinois Secretary of State, which pertained to the Illinois license plate (Chicago Bears Specialty Plate): 6063BD. The application listed Ronald Johnson of the 1100 block of James Peter Court in Darien, Illinois as the owner of a white 2014 Chevrolet pickup truck (VIN: 3GCUKSEC8EG12816). Listed in the section titled, "Daytime Phone Number," was 312-XXX-9566—**Target Phone 4**.

The white 2014 Chevrolet pickup truck (Illinois License Plate: 2781937B) observed during the August 12, 2022's controlled drug purchase, described above, is the same 2014 Chevrolet pickup truck (Illinois Chicago Bears Specialty License Plate: 6063BD) that was observed on the September 8, 2022 controlled drug purchase. According to the Illinois Secretary of State, both license plate registrations share the same owner (JOHNSON) and the same VIN.

During an ensuing conversation, which was captured on his/her recording equipment, CI-4 stated, "Man look my homie, he steady calling me for the 'fetty.' He steady calling. Cuz he like dude charged him 65 a gram." JOHNSON replied, "Oh okay." CI-4 then stated, "I'm like damn man that's too damn high. My people might get it lower than that. He like man ask your people for what they want. I'm like I got to holla at them. Remember last time I was going bring you a sample but you never brung it. But I'mma let him know next time I talk to him." JOHNSON responded, "Yeah I'mma charge you 40. You charge him whatever you want!" CI-4 agreed, "Exactly! See that's what I'm saying. Cuz I ain't going to lie. I can make that little gap." JOHNSON added, "He's going to love that." CI-4 replied, "So that's what I'm trying to tell yeah. So that's why. I'm like whenever you ready. You feel me." Prior to JOHNSON exiting CI-4's vehicle, as captured by his/her recording equipment, CI-4 continued to relay details pertaining to CI-4 receiving a sample of fentanyl from JOHNSON in the future. In response to CI-4, JOHNSON stated, "Just call me," and then exited CI-4's vehicle. Surveilling officers then observed JOHNSON reentering his white Chevy Silverado, which JOHNSON drove back to the East 42nd Place Premises, which JOHNSON was seen entering using a key. According to CI-4, while JOHNSON was still inside CI-4's vehicle, he handed CI-4 approximately 63 grams of suspected drugs (later confirmed to contain cocaine), and CI-4 handed JOHNSON approximately \$1,800.

b. Based on my training, experience, and knowledge of this investigation, I believe that when CI-4 stated, "Man look my homie, he steady calling me for the 'fetty,'" CI-4 was referring to the "fetty" (coded language for fentanyl) that

was mentioned in the previous controlled purchase on or about August 12 and August 26, 2022 with JOHNSON, detailed above. Further, I believe that when CI-4 informed JOHNSON that, “dude charged him 65 a gram,” CI-4 was informing JOHNSON that CI-4’s associate was paying approximately \$65 for each gram of fentanyl. When JOHNSON said, “yeah I’mma charge you 40. You charge him whatever you want,” I believe JOHNSON was informing CI-4 that JOHNSON will charge CI-4 \$40 for each gram of fentanyl, and that CI-4 could then charge CI-4’s associate whatever price CI-4 wished and keep the difference. Finally, I believe that when JOHNSON told CI-4, “Just call me,” JOHNSON was advising CI-4 to call him in reference to the discussed sample of fentanyl.

27. CI-4 met with FBI agents at a predetermined location, where agents again searched CI-4 and his/her vehicle, and confirmed CI-4 had no narcotics, contraband, firearms, or excess currency. CI-4 then provided agents with a plastic bag containing a powdery substance, which CI-4 had earlier received from JOHNSON, with a field weight of approximately 64.2 grams. Unless otherwise noted, CI-4’s movements from his/her departure from the predetermined location preceding the controlled purchase, until his/her return to the predetermined location, where agents took custody of the drugs that CI-4 obtained from JOHNSON, were documented by surveilling officers and/or by CI-4’s audio-video recording equipment. Later, agents submitted the suspected drugs to the DEA Lab for analysis. According to the lab results, the powdery substance—which the DEA Lab determined weighed approximately 62.9 grams—tested positive for the presence of cocaine.

4. September 23, 2022 Controlled Drug Purchase

20. On or about September 23, 2022, at approximately 9:56 a.m., JOHNSON, who was using **Target Phone 4**, had a consensually recorded telephone conversation with CI-4. During the conversation, JOHNSON said to CI-4, “What up! What up!” CI-4 responded, asking JOHNSON, “I’mma see you around 11?” JOHNSON told CI-4, “Uh yeah 11:30 would be good.” CI-4 replied, “Same spot right? Low end?” JOHNSON then responded, “yup.”

a. Based on my training and experience, and debriefs of CI-4, I believe that CI-4 was attempting to arrange a crack cocaine purchase from JOHNSON. I believe that when CI-4 said, “I’mma see you around 11?”, CI-4 was asking JOHNSON if CI-4 could meet with him in order to purchase crack cocaine from JOHNSON at or about 11:00 a.m. Further, I believe that when JOHNSON stated, “Uh yeah 11:30 would be good,” JOHNSON was advising CI-4 that 11:30 a.m. would be the time that JOHNSON would want to meet for the prospective drug sale. Finally, I believe that when CI-4 asked the clarifying question, “Same spot right? Low end,” and JOHNSON replied, “Yup,” that JOHNSON was confirming with CI-4 that JOHNSON would like to meet at or about the area of the intersection of South Ellis Avenue and East 43rd Street, where all of the preceding controlled drug purchases had taken place.

21. On or about September 23, 2022, prior to the planned meeting between CI-4 and JOHNSON, law enforcement met with CI-4 at a predetermined location, equipped CI-4 with audio-video recording device, and provided CI-4 approximately

\$2,000 in cash, in preparation for a potential controlled drug purchase between CI-4 and JOHNSON. Law enforcement searched CI-4 and CI-4's vehicle, and confirmed he had no narcotics, contraband, firearms, or excess currency.

22. Based on my training and experience, knowledge of this investigation, personal observations and surveillance, conversations with other agents and task force officers who provided surveillance during this controlled purchase, law enforcement's conversations with CI-4, and my review of the footage captured by CI-4's audio-video recording device, I know the following about CI-4's controlled purchase on or about September 23, 2022:

a. At approximately 11:01 a.m., surveilling officers observed JOHNSON exit a tan Mercedes truck that was parked on East 42nd Place and then walk into the East 42nd Place Premises. Approximately 30 minutes later, JOHNSON and another male (Individual A) exited the East 42nd Place Premises together. For his part, JOHNSON reentered the tan Mercedes truck, drove near the intersection of East 43rd Street and South Ellis Avenue, and entered the Gym, *i.e.*, the same location where the August 12, 2022 controlled drug purchase occurred, as described above. A few minutes later, surveilling officers saw JOHNSON meet with CI-4 outside the building unit and usher him/her inside.

b. Meanwhile, as captured on his/her recording equipment and observed by surveilling officers, CI-4 arrived in the area of East 43rd Street and South Ellis Avenue, exited his/her vehicle, and met JOHNSON outside the Gym, before both individuals walked into the Gym together. According to CI-4's recording equipment,

while entering the Gym, physical fitness equipment could be seen within. JOHNSON then walked behind a desk within the Gym and stated, “Aw, forgot the damn piece!” CI-4 replied, “You did. It’s cool sh*t, I’ll just grab it next time.” JOHNSON continued, “Damn! Definitely wanted you to get this. I know he gone love this.” CI-4 again replied, “It’s good, I’ll just grab it next time.” Shortly after this conversation, as captured by CI-4’s recording equipment and observed by surveilling officers, JOHNSON and CI-4 exited the Gym. Before departing, CI-4—as captured by his/her recording equipment—asked JOHNSON, “So next time I call you, you just gone grab for me?” JOHNSON replied, “Yeah.” CI-4 then walked back to CI-4’s vehicle, and departed the area. According to CI-4, while they were inside the Gym, JOHNSON retrieved a bag, concealed within a napkin, containing approximately 63 grams of suspected drugs (later confirmed to contain cocaine), and placed the drugs on a desk, from which CI-4 retrieved them; CI-4, in turn, placed approximately \$1,800 on the desk.

c. Based on my training, experience, and knowledge of this investigation, I believe that when JOHNSON stated, “Aw, forgot the damn piece,” that JOHNSON was referring to the sample of fentanyl that JOHNSON originally agreed to provide CI-4 during the August 12, 2022 controlled drug purchase, detailed above.

23. Following the controlled purchase, CI-4 met with FBI agents at a predetermined location, where agents again searched CI-4 and his/her vehicle, and confirmed CI-4 had no narcotics, contraband, firearms, or excess currency. CI-4 then

provided agents with a plastic bag containing a powdery substance, which CI-4 had earlier received from JOHNSON, with a field weight of approximately 64 grams. CI-4 also returned approximately \$200 to the FBI (the balance of the funds agents had provided CI-4, less the approximately \$1,800 used for the controlled purchase). Unless otherwise noted, CI-4's movements from his/her departure from the predetermined location preceding the controlled purchase, until his/her return to the predetermined location, where agents took custody of the drugs that CI-4 obtained from JOHNSON, were documented by surveilling officers and/or by CI-4's audio-video recording equipment. Later, agents submitted the suspected drugs to the DEA Lab for analysis. According to the lab results, the powdery substance—which the DEA Lab determined weighed approximately 62.9 grams—tested positive for the presence of cocaine.

B. RELEVANT TITLE III WIRETAP ORDERS

24. On or about November 16, 2022, Chief Judge Rebecca R. Pallmeyer, entered an Order (the “11-16-22 Order”) authorizing the initial interception of wire communications occurring to and from **Target Phone 4**, used by JOHNSON,⁹ for a 30-day period. Court-authorized interception pursuant to the 11-16-22 Order started on or about November 17, 2022, and ended on or about December 15, 2022.

⁹ Law enforcement identified JOHNSON as the user of **Target Phone 4** in this affidavit based on the following: (1) controlled purchases of drugs with JOHNSON, which were set up with CI-4 (discussed further above), who communicated with JOHNSON via **Target Phone 4**; (2) a search of the aforementioned phone number in CashApp revealed an account with the username “Ronald Johnson”; and (3) in communications over **Target Phone 4** intercepted pursuant to the 11-16-22 and 4-11-23 Orders, the user of **Target Phone 4** identifies himself as “Ronald Johnson,” as well other derivative aliases.

25. Additionally, on or about April 11, 2023, Acting Chief Judge Thomas M. Durkin entered an Order (the “4-11-23 Order”) authorizing the renewed interception of wire communications and initial interception of electronic communications occurring to and from **Target Phone 4** and the initial interception of wire communications over **Target Phone 5**, both used by JOHNSON,¹⁰ for a 30-day period.¹¹ Court-authorized interception pursuant to the 4-11-23 Order started on or about April 11, 2023, and ended on or about May 10, 2023.

C. JOHNSON’S INTERCEPTED CALLS WITH BONAPARTE ON OR ABOUT DECEMBER 5, 2022, AND SUBSEQUENT SEIZURE OF DRUGS FROM BONAPARTE (COUNT TWO)

26. On or about December 5, 2022, at approximately 7:43 p.m. JOHNSON, who was using **Target Phone 4**, had a telephone conversation with BONAPARTE, who was using phone number 708-XXX-6112.¹² During the conversation,

¹⁰ Law enforcement identified JOHNSON as the user of **Target Phone 5** in this affidavit based on the following: (1) according records received from AT&T, the “Financial Liable Party” for **Target Phone 5** is listed as “Ronald Johnson” at an address on the 1100 block of James Peter Court, in Darien, Illinois, which, based on surveillance and location data is JOHNSON’s primary residence, with a contact phone number as 312-XXX-9566 (**Target Phone 4**); (2) following the arrest of BROWN ROBINSON, a member of JOHNSON’s DTO, on or about January 24, 2023, by the Rock County Sheriff’s Office in Wisconsin, the FBI obtained a search warrant to search data associated with BROWN ROBINSON’s phone. Agents recovered a saved contact on BROWN ROBINSON’s phone who was assigned the name “Big Ron” for phone number 773-XXX-9160 (**Target Phone 5**); and (3) according to agents’ search on an open-source database, **Target Phone 5** appears to be associated with “JOHNSON RONALD,” the known last and first names of Ronald JOHNSON, as listed on his Illinois driver’s license.

¹¹ The 4-11-23 Order authorized the interception of wire and electronic communications over an additional phone, **Target Phone 6**, which is briefly discussed at Section III(K)(8).

¹² My identification of BONAPARTE as the user of 708-XXX-6112 in this Affidavit is based on, among other things, the following: (1) BONAPARTE’s identification of this phone number as his own during a traffic stop by Chicago Police Department officers on or about December 5, 2022, detailed further below; (2) records obtained from T-Mobile for 708-XXX-6112, which show it is subscribed to “Troy Bonaparte”; and (3) on or about August 2, 2022, Troy Bonaparte

BONAPARTE asked, “You said 43rd and Ellis?” JOHNSON replied, “Yeah.” BONAPARTE then stated, “I’m right here.” JOHNSON replied, “Aight here I come.”

a. Based on my training, experience, and knowledge of this investigation, I believe that in this call, when BONAPARTE stated, “you said 43rd and Ellis,” he was confirming that JOHNSON had arranged to meet with BONAPARTE at or about the area of East 43rd Street and Ellis Avenue in Chicago, Illinois. I also believe that when BONAPARTE stated, “I’m here,” he was informing JOHNSON that he had arrived at the pre-arranged meeting location near East 43rd Street and Ellis Avenue.

b. Law enforcement established surveillance in the vicinity of the East 42nd Place Premises, as well as the intersection of East 43rd Street and Ellis Avenue at approximately 5:25 p.m. At approximately 7:43 p.m., a grey Honda minivan (“Grey Minivan”) bearing Illinois license plate CN30579¹³ was seen arriving in the vicinity of the Gym, where CI-4 engaged in controlled drug purchases with JOHNSON on or about August 12, 2022, and September 23, 2022, as detailed above. At approximately 7:44 p.m., JOHNSON exited the East 42nd Place Premises, entered a 2018 black Cadillac Escalade bearing Illinois license plate CW28208, and

called the Chicago Police Department to report a vehicle stolen, identifying himself by name, and providing 708-XXX-6112 as his call-back number.

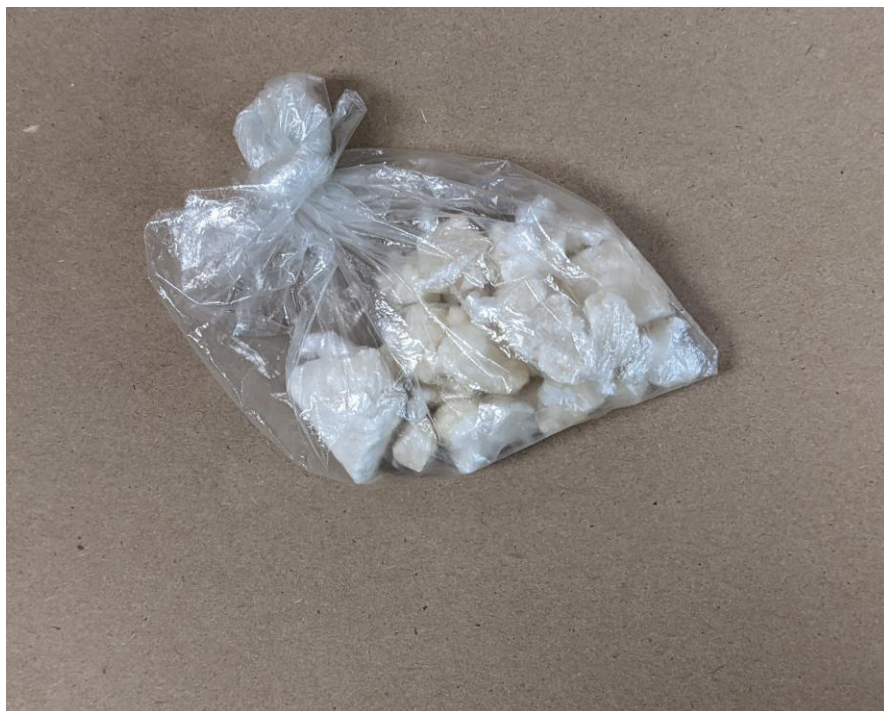
¹³ According to ILSOS records, the Grey Minivan was registered to BONAPARTE at an address on the 7900 block of South Clyde Avenue in Chicago, Illinois. Further, and as will be described, CPD officers conducted a traffic stop on the Grey Minivan that was recorded via body-worn camera. Based on my review of the body-worn camera footage of the traffic stop, and comparing the recorded images of the driver of the Grey Minivan against BONAPARTE’s known booking photograph from a prior arrest, I believe that BONAPARTE was, in fact, the driver of the Grey Minivan.

departed the area. At approximately 7:46 p.m., JOHNSON arrived at or near the Gym, and approximately a minute later, BONAPARTE entered JOHNSON's vehicle. At approximately 7:50 p.m., BONAPARTE exited JOHNSON's vehicle, entered the Grey Minivan, and departed the area of East 43rd Street and Ellis Avenue.

c. Law enforcement continued surveilling the Grey Minivan following its departure from the intersection of East 43rd Street and Ellis Avenue. At approximately 7:57 p.m., CPD officers conducted a traffic stop of the Grey Minivan. Before conducting the stop, the CPD officers were advised, by FBI agents, that BONAPARTE and JOHNSON were recently observed conducting what appeared to be an illegal drug transaction. The responding CPD officers told FBI agents that they stopped BONAPARTE's vehicle after observing multiple traffic violations, including failure to stop at stop sign, failure to use a signal to merge in and out of traffic, and a speeding violation. CPD officers activated emergency equipment and curbed the Grey Minivan at approximately 5710 South Cornell Drive. According to the CPD officers, as they approached the Grey Minivan, they saw BONAPARTE moving his arms to his front-waistband area and lifting his buttocks off his seat. As captured on body-worn camera footage, the officers explained the reasons for the traffic stop and asked BONAPARTE to exit the Grey Minivan. BONAPARTE was subsequently detained, and gave the CPD officers verbal consent to search his vehicle, which was captured on body-worn camera footage. During their search of the minivan, officers recovered four sealed ziplock bags containing approximately 21.1 grams of suspected cannabis. Further, during a pat-down search, officers recovered one clear plastic bag containing

a white rocklike substance (suspected crack cocaine) from BONAPARTE's sweater pocket. After the CPD officers' field investigation was completed, and the suspected drugs were seized, BONAPARTE was released. According to the lab results, the white-rock like substance—which the DEA Lab determined weighed approximately 20.34 grams—tested positive for the presence of cocaine base.

i. Based on my training and experience, knowledge of this investigation, and conversations with other law-enforcement agents with relevant knowledge and experience, I know that a typical user quantity of crack cocaine is a “rock,” consisting of approximately 0.1 to 0.2 grams of crack cocaine. Here, the plastic bag seized from BONAPARTE contained multiple servings of crack cocaine, which were individually wrapped in smaller bags, as depicted in the image below:



ii. Further, the suspected marijuana that was recovered from BONAPARTE was packaged in four separate sealed zip-lock bags. Given the volume

of crack cocaine seized from BONAPARTE, and the manner in which the crack cocaine and suspected marijuana seized from BONAPARTE was packaged for resale, I believe that these drugs were intended for distribution, rather than personal use.

D. BROWN ROBINSON’S INVOLVEMENT IN JOHNSON’S DTO

1. November 17, 2022 Suspected Drug Delivery By BROWN ROBINSON

27. On or about November 17, 2022, at approximately 1:17 p.m. BROWN ROBINSON was observed on pole-camera footage¹⁴—on a device set up near the East 42nd Place Premises—exiting a 2018 grey Dodge Journey bearing Illinois license plate AS43877 (hereafter, the “Grey Dodge”).¹⁵ BROWN ROBINSON was then seen exiting the driver’s door of the vehicle, retrieving a drawstring bag from the trunk of the vehicle, and then re-entering the driver’s door. At approximately 1:23 p.m., Individual A was seen on pole-camera footage exiting the East 42nd Place Premises, carrying what appeared to be a red bag.¹⁶ Individual A then approached the Grey Dodge and appeared to reach into the front-passenger compartment of the vehicle.

¹⁴ BROWN ROBINSON was identified via her driver’s license during a traffic stop on the same day, discussed below.

¹⁵ According to Illinois Secretary of State records, the Grey Dodge was co-registered to BROWN ROBINSON.

¹⁶ On this occasion, surveillance officers assigned to this investigation did not know the identity of Individual A as depicted in his Indiana state Driver’s License photo and only identified him as an “unknown black male wearing a dark winter jacket and stocking cap.”

Moreover, my identification of Individual A during this occasion is based on the following: I am generally familiar with Individual A’s physical appearance as documented on previous occasions of surveillance, his image as depicted in his Indiana state driver’s license, and my review of video evidence captured by surreptitiously placed pole-mounted camera at or near the East 42nd Place Premises, which captured Individual A, who appeared substantially similar in appearance to the above mentioned description (*i.e.* an “unknown black male wearing a dark winter jacket and stocking cap”), and I believe they are the same person.

Individual A walked away from the Grey Dodge, no longer carrying the red bag that was previously observed in his possession. One minute later, at approximately 1:24 p.m., BROWN ROBINSON departed from the East 42nd Place Premises in the Grey Dodge.

a. According to toll records for **Target Phone 5**, BROWN ROBINSON, using 708-XXX-0947,¹⁷ received three telephonic communications from **Target Phone 5** on November 17, 2022; just prior to the observation above. These three communications had taken place from approximately 12:41 p.m. to 12:45 p.m. Further, I believe that all three of these telephonic communications to have been answered by **Target Phone 5**, due to the length of each contact. Based on my training, experience, and knowledge of this investigation, I believe that the above-mentioned telephonic contacts were made in order for JOHNSON (who was using **Target Phone 5**) to facilitate a suspected delivery of illegal drugs, using BROWN ROBINSON as a courier.

28. Law enforcement maintained surveillance on the Grey Dodge following BROWN ROBINSON's departure from the East 42nd Place Premises. At approximately 4:42 p.m., the Grey Dodge (which was not seen picking up any new

¹⁷ Law enforcement identified BROWN ROBINSON as the possible user of 708-XXX-0947 in this Affidavit based on the following: (1) telephonic records from T-Mobile listed the subscriber of 708-XXX-0947 as "Sulstine Brown Robinson" at a residence on the 1400 block of S Indiana Avenue, in Chicago, Illinois; (2) following her arrest on or about January 24, 2023, by the Rock County Sheriff's Office in Wisconsin, the FBI obtained a search warrant to search data associated with a phone seized from BROWN ROBINSON, which was assigned call number 708-XXX-0947; and (3) a search of the phone number 708-XXX-0947 in CashApp revealed an account with the display name "Sulstine Brown Robinson" and username "\$Smithsulstine1."

passengers or bags during its trip) was observed parking in the driveway of the 2255 Frontier Road, Decatur, Illinois (the “Decatur Premises”). Shortly thereafter, at approximately 4:44 p.m., an unknown male (“UM1,” who is believed to be the same person as FNU LNU 11, described in the call with **Target Phone 4** discussed below) was seen exiting a gold-colored SUV parked in the driveway of the Decatur Premises, approached the Grey Dodge, and then opened the front-passenger door. Shortly thereafter, UM1 was observed walking away from the Grey Dodge, towards the Decatur Premises, while carrying a red bag.

a. According to its toll records, **Target Phone 5** received two calls from BROWN ROBINSON on or about November 17, 2022. These communications had taken place between approximately 4:41 p.m. and 4:44 p.m. Further, due to their length, I believe both of these telephonic communications to have been unanswered by **Target Phone 5**. Based on my training, experience, and knowledge of this investigation, I believe that the message that BROWN ROBINSON had attempted to communicate in the unanswered telephonic communications to JOHNSON (using **Target Phone 5**), was successfully delivered in the 4:45 p.m. conversation that is described below.

29. On or about November 17, 2022, at approximately 4:45 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with BROWN ROBINSON. During the conversation, BROWN ROBINSON told JOHNSON, “Outside.” JOHNSON then replied, “Oh okay . . . Actually he gone to work, I told you he gotta go to work. He probably gone, I’ll see.”

a. Based on my training, experience, and knowledge of this investigation, as well as contemporaneous surveillance of BROWN ROBINSON, I believe that in this call, when BROWN ROBINSON stated, “Outside,” she was notifying JOHNSON that she had arrived and was waiting outside the driveway of the Decatur Premises, where law enforcement surveillance officers observed BROWN ROBINSON in her Grey Dodge. Further, I believe that BROWN ROBINSON was waiting for the expected recipient of a red bag, which (as detailed above) surveilling agents saw was carried away from BROWN ROBINSON’s car—the Grey Dodge—by UM1, as BROWN ROBINSON was still parked outside the Decatur Premises. I believe that when JOHNSON replied, “He probably gone, I’ll see,” he was informing BROWN ROBINSON that UM1 was potentially no longer at the Decatur Premises, and that JOHNSON would call UM1 to see if UM1 was still there.

30. On or about November 17, 2022, at approximately 4:46 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with FNU LNU 11 who was using phone number 217-XXX-2638. During the conversation, JOHNSON asked FNU LNU 11, “What up, you already broke out huh?,” to which FNU LNU 11 replied, “Na, I’m still here right sittin’ right here.” JOHNSON then stated, “Oh, she say, she in the, she say she in the driveway.” Moments later, FNU LNU 11 responded, “Aight yeah she still out there okay.”

a. Based on my training, experience, and knowledge of this investigation, I believe that in this call, when JOHNSON asked, “What up, you already broke out huh?,” he was asking FNU LNU 11 if he had left his home already.

Further, I believe that FNU LNU 11 is the same individual as UM1, and that JOHNSON's inquiry of FNU LNU 11's location was in reference to the Decatur Premises. I also believe that when FNU LNU 11 replied, "Na, I'm still here...", he was advising JOHNSON that he is still at the Decatur Premises. I believe that when JOHNSON stated, "she say she in the driveway," he was informing FNU LNU 11 that BROWN ROBINSON was in the driveway of the Decatur Premises, as she had earlier advised JOHNSON in the call described above. Further, I believe that when FNU LNU 11 stated, "she still out there okay," he was acknowledging that he could see BROWN ROBINSON parked in the driveway of the Decatur Premises, as noted above.

b. Law enforcement continued to maintain surveillance on the Grey Dodge following BROWN ROBINSON's departure from the Decatur Premises. At approximately 7:40 p.m., the Grey Dodge was observed being pulled over by a marked police vehicle. Based on an interview of the Illinois State Police officer responsible for the traffic stop, BROWN ROBINSON provided the officer with a driver's license, which identified BROWN ROBINSON by the same name and date of birth that is known to agents. In addition, when asked for a telephone number, BROWN ROBINSON provided 708-XXX-1063 (which is different than the number BROWN ROBINSON used to call JOHNSON at **Target Phone 4**, discussed in this Affidavit).

2. November 18, 2022 Suspected Drug-Money Delivery By BROWN ROBINSON

31. On or about November 18, 2022, at approximately 1:13 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with

BROWN ROBINSON. During the conversation, JOHNSON asked BROWN ROBINSON, “He said 3 o’clock?” BROWN ROBINSON responded, “Yup, it should be there at 3 o’clock.” JOHNSON replied, “What’s that got to do with you? I told you he said 3 o’clock.”

a. Based on my training, experience, and knowledge of this investigation, I believe that in this call, when BROWN ROBINSON stated, “It should be there at 3 o’clock,” she was notifying JOHNSON about the time that she expected to have an undetermined amount of drug-related money delivered (namely, by approximately 3:00 p.m.). Agents further believe that when JOHNSON said, “I told you he said 3 o’clock,” he was referring to Individual A being ready for a drug-related money delivery at approximately 3:00 p.m., based on calls discussed below.

b. According to toll records for **Target Phone 5**, on or about November 18, 2022, BROWN ROBINSON received a telephonic communication from **Target Phone 5** at approximately 12:01 p.m.¹⁸ This communication was believed to had been an answered call due to the time-length of the contact. Additionally, from approximately 1:09 p.m. to 1:10 p.m., **Target Phone 5** made three telephonic communications to BROWN ROBINSON. These communications were believed to had been unanswered due to the time-length of the contact. Based on my training, experience, and knowledge of this investigation, I believe that these calls were

¹⁸ Based on my training my training, experience, and knowledge of this investigation, I believe that this telephonic communication between BROWN ROBINSON and JOHNSON (using **Target Phone 5**) was made in order to plan the facilitation of the suspected drug-money delivery, which is described in this affidavit.

BROWN ROBINSON's attempt to contact JOHNSON to discuss what the two ultimately discussed in the call at approximately 1:13 p.m. described above.

32. On or about November 18, 2022, at approximately 1:19 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with Individual A who was using phone number 608-XXX-1103. During the conversation, Individual A asked JOHNSON, "So did you said the lady gonna be there at 3 right?" JOHNSON replied, "Yes, 3 o'clock, she'll be there, I told her 3:30 since you said 3 cause I want to make sure you'll be there." Individual A then stated, "I'm gonna be on the highway, but I was gonna god dammit uh, get that money.... give it to Tina... And Tina said she's gonna be there at 3."

a. Based on my training, experience, and knowledge of this investigation, I believe that in this call, when Individual A asked JOHNSON, "you said the lady gonna be there at 3 right," Individual A was confirming with JOHNSON that an unknown female (UF1) would be at a location (now believed, based on agents' surveillance, as discussed further below, to be the East 42nd Place Premises) at approximately 3:00 p.m. Agents also believe that when JOHNSON replied, "I told her 3:30 since you said 3 cause I want to make sure you'll be there," he was informing Individual A that JOHNSON told UF1 to be at the East 42nd Place Premises at around 3:30 p.m. in order to make sure that Individual A would be present for a drug-related transaction. Agents also believe that when Individual A stated, "I was gonna god dammit uh, get that money.... give it to Tina... and Tina said she's gonna be there at 3," he was referring to BROWN ROBINSON (by the name "Tina") and informing

JOHNSON that Individual A intended to provide BROWN ROBINSON with suspected drug-related money that was to be delivered to UF1.

b. According to pole-camera footage—on a device set up near the East 42nd Place Premises—at approximately 3:28 p.m. on or about November 18, 2022, a white car bearing Arizona license plate FB248W (“White Mini”)¹⁹ parked in front of the East 42nd Place Premises. At or about the same time, a female (believed to be Individual B, who has been seen using the White Mini) exited the driver’s side of the white car, walked to and retrieved a black bag from the passenger side of the Grey Dodge (BROWN ROBINSON’S vehicle, which was also parked in front of the East 42nd Place Premises), and returned to the driver’s door of the White Mini. At approximately 3:32 p.m., the White Mini departed from the East 42nd Place Premises.

c. According to toll records for **Target Phone 5**, on or about November 18, 2022, BROWN ROBINSON received a telephonic communication from **Target Phone 5** at approximately 3:30 p.m. This communication was believed to had been an answered call due to the time-length of the contact. Based on my training my training, experience, and knowledge of this investigation, I believe that this telephonic communication between BROWN ROBINSON and JOHNSON (using

¹⁹ According to law-enforcement databases, the “White Mini” was registered to a business at an address in Peoria, AZ. According to body-worn camera footage, which captured the seizure of **December 2022 Funds** (as detailed further below), Individual B stated that the “White Mini” was her “sister’s car.”

Target Phone 5) was made in order for BROWN ROBINSON to advise JOHNSON of her delivery of the suspected drug-related money to Individual B.

3. Intercepted Communications Between JOHNSON and BROWN ROBINSON Preceding Seizure of December 2022 Funds from Individual B

33. As described below, on December 6, 2022, law enforcement seized approximately \$300,500 in cash (the **December 2022 Funds**) from Individual B after she met with JOHNSON at the East 42nd Place Premises and received a large duffle bag which contained the cash.

34. As background, on or about December 2, 2022, at approximately 3:21 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with BROWN ROBINSON, who was using phone number 708-XXX-0947. During the conversation, BROWN ROBINSON told JOHNSON, “Call me if you need me.” JOHNSON replied, “Yeah cuz you gotta pay those bills for me. I ain’t gon nothing done.” BROWN ROBINSON then asked JOHNSON, “Did you put it together?” JOHNSON responded, “We’ll probably do it later on.”

a. Based on my training, experience, and knowledge of this investigation, I believe that in this call, when BROWN ROBINSON told JOHNSON, “Call me if you need me,” she was advising JOHNSON to call her if JOHNSON needed her for any drug-dealing activities. I also believe that when JOHNSON replied, “Yeah cuz you gotta pay those bills for me,” he was using coded language (“bills”) to inform BROWN ROBINSON that she would deliver payments owed to JOHNSON’s drug supplier(s). Further, I believe that when BROWN ROBINSON

asked JOHNSON, “Did you put it together,” she was inquiring whether JOHNSON had prepared the payment for delivery to his drug supplier(s).

35. On or about December 6, 2022, at approximately 6:33 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with BROWN ROBINSON who was using phone number 708-XXX-0947. During the conversation, BROWN ROBINSON told JOHNSON, “You better get those bills together or you gonna go eight months without electricity.” JOHNSON replied, “Right, exactly alright.”

a. Based on my training, experience, and knowledge of this investigation, I believe that in this call, when BROWN ROBINSON told JOHNSON, “You better get those bills together or you gonna go eight months without electricity,” she was advising JOHNSON that he should get payment together for his drug supplier(s), so that he does not lose his supply chain for illegal drugs. I also believe that when JOHNSON replied, “Right, exactly alright,” he was agreeing that he should prepare the payment for his drug supplier(s).

4. Seizure of December 2022 Funds from Individual B, Following Individual B’s Meeting with JOHNSON at the East 42nd Place Premises

36. Based on my training and experience, my knowledge of this investigation, my observations of footage captured by a pole camera installed near the East 42nd Place Premises, and my conversations with other agents and individuals with knowledge of the relevant facts, I know the following:

a. On December 6, 2022, at approximately 9:15 p.m., law enforcement observed the White Mini arrive in front of the East 42nd Place Premises.

b. At approximately 9:17 p.m., law enforcement observed a black female (later confirmed to be Individual B based on a subsequent traffic stop detailed further below), exit the driver's compartment of the White Mini. Around the same time, JOHNSON was seen exiting the East 42nd Place Premises carrying a dark-green duffle bag. He then approached and hugged Individual B at the rear of the White Mini. Following their embrace, Individual B revisited the driver's compartment of the White Mini (presumably to unlock the vehicle's rear hatch), and JOHNSON then opened the rear-hatch area of the White Mini before placing the duffle bag inside. JOHNSON also removed two bags from the trunk area of the White Mini: one silver bag and one large dark-colored bag that appeared to be a suitcase.

c. At approximately 9:18 p.m., law enforcement saw JOHNSON and Individual B walk into the East 42nd Place Premises, while JOHNSON was carrying the previously mentioned silver and dark-colored bags that he retrieved from the White Mini after placing the dark-green duffle bag inside the car.

d. At approximately 9:21 p.m., law enforcement observed Individual B exit the East 42nd Place Premises.

e. At approximately 9:22 p.m., law enforcement observed Individual B enter the driver's compartment of the White Mini, and approximately one minute later, the car departed the East 42nd Place Premises.

37. Following Individual B's departure from the East 42nd Place Premises at approximately 9:23 p.m., FBI Task Force Officers (TFOs) attempted to locate the White Mini and recover the contents of the green bag that JOHNSON placed inside the car. Based on my training and experience, my knowledge of this investigation, my personal observations, and my conversations with other agents and individuals with knowledge of the relevant facts, I know the following:

a. On or about December 6, 2022, at approximately 9:50 p.m., FBI TFOs, cross-sworn with CPD and driving in an unmarked CPD vehicle, located the White Mini traveling eastbound on 13th Street in Chicago. FBI TFOs activated their emergency lights and ultimately stopped the vehicle at or about 110 East 13th Street.

b. Once the White Mini was stopped, FBI TFOs—who were equipped with body-worn cameras—made contact with two occupants, one of whom was Individual B, who was driving, and another female (Individual C), who was in the front-right passenger's seat. As captured by the body-worn camera footage, the TFOs used a ruse to explain their reason for stopping the vehicle. Specifically, TFOs explained to Individual B and Individual C that the officers were in search of a vehicle that was responsible for a shooting that involved an AK-styled weapon. Further, officers explained to Individual B and Individual C that the White Mini matched the description of the vehicle suspected of being involved in the alleged shooting.

c. Both occupants were asked to step outside of the White Mini and exited upon request of the TFOs. Then, one of the TFOs observed a green duffle bag in the vehicle's rear compartment, which appeared to be the same or substantially

the same in appearance as the bag that JOHNSON was seen placing into the same area of the car before its departure from the East 42nd Place Premises. As captured on body-worn camera footage, a TFO then walked to the rear of the vehicle and opened the rear-hatch area and seized the foregoing green duffle bag. According to the TFO performing the search, there were no other duffel bags in the rear compartment of the vehicle. Upon opening of the bag, a TFO located bulk quantities of cash in different denominations (the **December 2022 Funds**). Before departing from the scene, TFOs advised Individual B and Individual C to visit the CPD's 1st District for inquiries about the seized cash.²⁰ Individual B and Individual C were then released without charges.

38. Based on my training and experience, my conversations with other FBI TFOs, and my review of CPD reports, I know the following:

a. On or about December 6, 2022, at approximately 10:10 p.m., FBI TFOs arrived at CPD's Homan Square facility, where they arranged for a CPD K9

²⁰ On December 6, 2022 at approximately 11:40 p.m. Individual B and Individual C filed a complaint with CPD in regards to the seizure of funds. Individual B reported to CPD that she and her mother (Individual C) were in the vehicle during the traffic stop, and that the responding officers (FBI TFOs) notified her that her vehicle matched the description of an offending vehicle that was shooting an "AK" gun into the air. Individual B advised CPD that the responding officers had searched her vehicle and taken approximately \$200,000 U.S. Currency from Nevada State Bank envelopes that were located in her trunk area. Following this statement, Individual B informed CPD that she was waiting for officers to return her property and \$220,000 U.S. Currency, which was inconsistent with Individual B's initial claim of the responding officers taking \$200,000 from Nevada State Bank envelopes. Individual B's complaint was documented with CPD. As detailed further below in photographs, the cash seized from the duffel bag in Individual B's car was not in Nevada State Bank envelopes; rather, it was in rubber-banded stacks that I know, based on my training and experience, are commonly seen for bulk cash quantities used for drug-related transactions.

Police Officer (Officer Garza, Star #14970) and CPD K9 (Gunner) to examine the **December 2022 Funds**.

b. According to information obtained from CPD, Gunner is certified in narcotic detection by the Illinois Law Enforcement Training and Standards Board (ILETSB). Gunner was certified on or about July 21, 2022, for detecting the odor of heroin, cocaine, crack cocaine, methamphetamine, and marijuana. ILETSB implements a number of distractors during their certifications. Those distractors fall into three categories; food items, toys, and miscellaneous items (*i.e.*, plastic bags, duct tape, evidence bags, etc.). Gunner is also trained to indicate to the presence of such substances or their scents by alerting to the item he is sniffing. According to ILETSB, drug detection canines' (such as Gunner's) training in narcotics detection includes searching for narcotics in various containers, buildings, and vehicles in both indoor and outdoor capacities.

c. Officer Garza and Gunner cleared the rear of the garage bay to confirm the area was clear of narcotics odor. Officer Garza and K9 Gunner then exited the cleared area. At this time, an FBI TFO entered the cleared area and placed the seized duffle bag containing the **December 2022 Funds** on a pallet of de-icing salt bags.

d. Officer Garza and Gunner then re-entered the rear of the garage bay (the area which was previously cleared of any narcotics odor), and Officer Garza gave Gunner the command to search for narcotics. Gunner eventually came upon the previously mentioned pallet of salt bags, and gave Officer a positive indication of the

presence of a narcotic odor, while staring directly at the previously placed duffle bag containing the **December 2022 Funds**.

e. On or about December 7, 2022, following the positive canine sniff from Gunner, FBI TFOs relocated the duffle bag containing the **December 2022 Funds** to FBI Chicago Headquarters, and relinquished custody of the bag and its contents to FBI agents. Below are photographs of the seized duffle bag, and the **December 2022 Funds** (totaling approximately \$300,500) inside it:



5. January 24, 2023 Drug Seizure from BROWN ROBINSON (Count Three)

39. According to surveillance officers, at approximately 3:14 p.m. on January 24, 2023, JOHNSON departed the East 42nd Place Premises and placed a duffle bag in the rear compartment of the Grey Dodge, which was parked outside.²¹



40. After that, the Grey Dodge departed the East 42nd Place Premises and drove to a location at or near 2000 East 68th Street in Chicago, Illinois. Upon the Grey Dodge's arrival at that location, a male, referred to herein as Individual D,²² entered the front right passenger's seat. Then, the vehicle departed once more and traveled northbound toward Wisconsin without stopping.

41. Law enforcement maintained surveillance and coordinated with local law enforcement from the Rock County Sheriff's Office in Wisconsin, who performed a traffic stop on the vehicle at approximately 5:46 p.m., at or near US Interstate 90

²¹ As detailed below, BROWN ROBINSON was identified as the driver of this vehicle during a traffic stop and arrest by the Rock County Sheriff's Office on or about January 24, 2023.

²² The government's investigation regarding Individual D's relationship or involvement in JOHNSON's DTO, if any, is ongoing.

near Wisconsin highway 59 for speeding (approximately 80 miles per hour in a 70 mile per hour zone) and impeding traffic. There, according to reports received from the Rock County Sheriff's Office,²³ the deputy who performed the traffic stop called for Wisconsin State Troopers' assistance, who arrived on scene. Additionally, the deputy directed BROWN ROBINSON, who was driving the Grey Dodge, to walk to his patrol vehicle to collect her information and from there, a Wisconsin State Police Officer wrote BROWN ROBINSON a warning for her speed. A Wisconsin State Trooper directed Individual D to step out of the vehicle and walk to the front of the deputy's patrol vehicle. Then, the deputy deployed his canine partner, "Kamo,"²⁴ who performed an open-air sniff of the vehicle and alerted to the presence of a narcotic odor.

42. According to the police report of the incident, the deputy confronted Individual D about Kamo's alert to the odor of narcotics, and Individual D admitted to possessing some marijuana. The deputy conducted a search of the vehicle and located a turquoise and black duffle bag with its handles secured together by Velcro.²⁵ According to the deputy who conducted the search and police reports associated with

²³ As noted below, the facts related to this stop were obtained by (1) reports compiled by and provided by the Rock County Sheriff's Office, (2) a deputy interview conducted by investigators after this incident, and (3) surveillance officer's observations on or about January 24, 2023, during the time periods covering this incident.

²⁴ According to the police report associated with this incident, "Kamo" was certified through the North American Police Work Dog Association on or about November 8, 2019, and has been re-certified annually, thereafter. Additionally, canine "Kamo" is certified to detect the odors of methamphetamine, cocaine, and heroin.

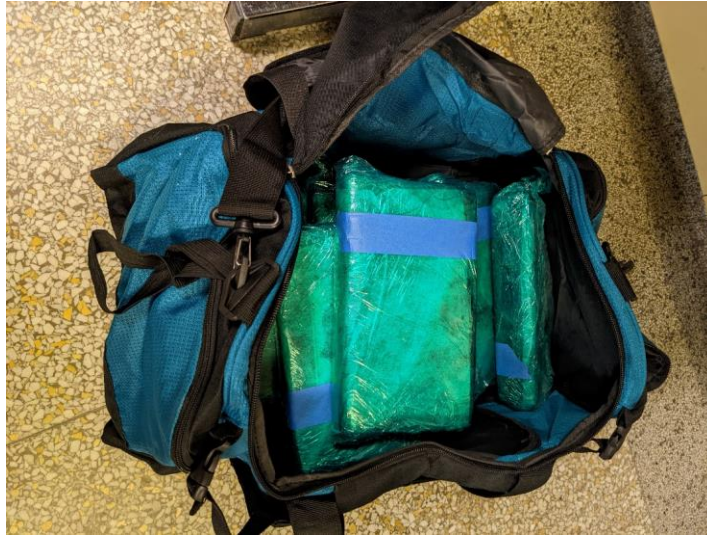
²⁵ Based upon my comparison to the bag observed on the pole-camera footage of JOHNSON and the image of the bag (as depicted below), which was seized by the deputy, I believe they are the same.

this incident, the deputy observed its contents, some of which appeared to be clothing items, and located approximately six large square block items, wrapped in cellophane and had blue attached, which he knew from training that items packaged and concealed like this are known as “kilos” and contain narcotics.²⁶ Both BROWN ROBINSON and Individual D were subsequently arrested and transported to the Rock County Sheriff’s Office for further investigation along with the suspected narcotics. According to law enforcement reports documenting this incident, the bag contained six separate bricks wrapped in green cellophane, each weighing over approximately one kilogram for a total combined weight of approximately 7.095 kilograms.²⁷ Additionally, the six bricks were each field tested and were positive for the presence of cocaine. Further, an FBI responding agent arrived at the Rock County Sheriff’s Office following this traffic stop and took still photos of the seized bag and its drug-related contents.

[CONTINUED ON NEXT PAGE]

²⁶ According to the deputy who performed the traffic stop, the deputy initially incorrectly believed the “large square block items” were heroin due to the existence of brown color, however as previously mentioned, a presumptive field test revealed the items were positive for the presence of cocaine.

²⁷ According to law enforcement reports documenting this incident, each brick of suspected cocaine was weighed with the base layer of plastic and rubber and without the additional cellophane wrapping.



43. Moreover, on or about January 24, 2023 at approximately 3:18 p.m., a few minutes after JOHNSON placed the green duffel bag into the rear compartment of the Grey Dodge, **Target Phone 4**, believed to be used by JOHNSON, had telephonic contact BROWN ROBINSON (using 708-XXX-0947), following her departure from the East 42nd Place Premises.

a. Based on my training, experience, and knowledge of this investigation, I believe that the purpose of the telephonic contact between JOHNSON

and BROWN ROBINSON, at or about 3:18 p.m. on or about January 24, 2023, was to orchestrate the foregoing approximate 7.095 kilogram suspected cocaine delivery.

44. Following their arrests, BROWN ROBINSON and Individual D were both booked at the Rock County Jail. On or about January 26, 2023, while incarcerated in Rock County Jail, BROWN ROBINSON made an outgoing call to an unidentified individual, believed to be a female (UF3) that was using 773-XXX-7775.²⁸ During the conversation, BROWN ROBINSON informed UF3, “Imma need a phone.” UF3 asked, “you gonna need a what baby?” BROWN ROBINSON stated, “a phone when I... uh erase that phone.” UF3 asked, “they erased what phone?” BROWN ROBINSON continues, “I’mma need a phone, they took my phone. I have to have a phone to get in the house. Let him know I need a phone.”

a. Based on my training, experience, and knowledge of this investigation, I believe that when BROWN ROBINSON stated, “erase that phone,” that BROWN ROBINSON was communicating her need to cancel service on 708-XXX-0947. I believe that when BROWN ROBINSON had stated, “I’mma need a phone, they took my phone. I have to have a phone to get in the house,” that BROWN ROBINSON was informing UF3 that Rock County Sheriff’s Office had taken her cell phone, which she would have to replace with a new phone. I further believe that when BROWN ROBINSON stated, “let him know I need a phone,” that she was asking UF3

²⁸ According to jail call records received from Rock County Sheriff’s Office, the above-referenced call was made via an inmate account belonging to BROWN ROBINSON. Further, through the voice comparison of the above-referenced call, and BROWN ROBINSON’s intercepted communications pursuant to the 11-16-22 Order, I believe BROWN ROBINSON to have been the outgoing caller in the above-referenced call.

to notify JOHNSON (or potentially another individual) of BROWN ROBINSON's need for a new cell phone.

45. According to records obtained from T-Mobile, on or about February 2, 2023, BROWN ROBINSON terminated service on 708-XXX-0947. Further, on the same date (February 2, 2022), BROWN ROBINSON activated or started service on 708-XXX-1043. Finally, according to toll records obtained for **Target Phone 4** (from records queried through February 9, 2023), 708-XXX-1043 had one toll communication with **Target Phone 4**, which occurred on or about February 2, 2023.

6. Evidence Recovered from BROWN ROBINSON's Phone

46. Incident to her arrest on or about January 24, 2023, the Rock County Sheriff's Office seized a cell phone from BROWN ROBINSON's person and obtained a state search warrant for that phone. Subsequently, on or about March 27, 2023, the FBI obtained a federal search warrant, issued by the United States District Court for the Western District of Wisconsin, for a copy of the data extraction of the cell phone seized from BROWN ROBINSON.

47. Upon review of the data obtained from the phone, agents confirmed that it was assigned call number 708-XXX-0947 (*i.e.*, the same phone number that BROWN ROBINSON used in communications with JOHNSON that were intercepted over **Target Phone 4**, as described herein). Further, agents recovered pertinent evidence from BROWN ROBINSON's phone, including:

a. The following saved contacts: (i) a contact bearing the name "Li [sic] Ron," with phone number 312-XXX-9566 (**Target Phone 4**); (ii) a contact

bearing the name “Big Ron,” with phone number 773-XXX-9160 (**Target Phone 5**); (iii) a contact bearing the name “Chuck Lu” and “Lu Chuck” with phone number 773-XXX-6026, believed to be associated with LAWRENCE, and the same number that LAWRENCE used in communications with **Target Phone 4** that were intercepted pursuant to the 4-11-23 Order, some of which are summarized below; (iv) a contact bearing the name “Dj” with phone number 312-XXX-8719, believed to be associated with JONES, and the same number that JONES used in communications with **Target Phone 4** and **Target Phone 6** that were intercepted pursuant to the 4-11-23 Order, some of which are summarized below; (v) a contact bearing the name “E” with phone number 312-XXX-5402 (**Target Phone 6**); (vi) a contact bearing the name “Cousin [redacted]” with phone number 773-XXX-6288, believed to be associated with Individual D, and the same number that Individual D provided to the Rock County Sheriff’s Office as his own while being booked following his arrest on or about January 24, 2023; and (vii) a contact bearing the name “Reel” with phone number 608-XXX-1105, believed to be associated with Individual A, and the same number that Individual A used in communications with **Target Phone 4** that were intercepted pursuant to the 11-16-22 Order, some of which are summarized above; and (vii) a contact bearing the name “Magnificent” (a known alias for BONAPARTE) with phone number 312-XXX-8636, a phone number that is subscribed to “Troy Bonaparte,” at an address on the 8000 block of South Ingleside Avenue in Chicago, Illinois.

b. A group text message from a contact saved as “Mo” with phone number 773-XXX-7742 to BROWN ROBINSON, JOHNSON (at **Target Phone 4**),

and JONES (at 312-XXX-8719), among others, on or about March 23, 2022, which stated, “Orders and payments due by Fri: Thanks again. Zelle.”

c. An iMessage²⁹ from BROWN ROBINSON to JOHNSON on or about September 9, 2022, in which she wrote, “You pay [redacted] before me wow.”

i. Based on my training and experience, and knowledge of this investigation, I believe that the person BROWN ROBINSON referred to in the above message to JOHNSON was Individual D, the person with whom BROWN ROBINSON was stopped by the Rock County Sheriff’s Office carrying approximately 7 kilograms of suspected cocaine on or about January 24, 2023.

d. An iMessage from JOHNSON to BROWN ROBINSON on or about September 13, 2022, in which he wrote, “Good night, you look really nice tonight. Thats were all my dam money been going . Lol,” and BROWN ROBINSON responded, “Lol you my boss I can’t go out any kind of I reception you *[sic]*.”

i. Based on my training and experience, and knowledge of this investigation, I believe that in the above exchange, JOHNSON confirmed that he regularly paid BROWN ROBINSON (“Thats were all my dam money been going” and BROWN ROBINSON acknowledged that she was employed by JOHNSON (“Lol you my boss....”).

²⁹ Based on my training, experience, and knowledge of this investigation, I understand that text communications transmitted via iMessage are encrypted and are not capable of being intercepted pursuant to Title III wiretap orders. Accordingly, any iMessages recovered from BROWN ROBINSON’s phone, which were exchanged with any **Target Phones**, were not intercepted by law enforcement pursuant to the 11-16-22 and 4-11-23 Orders.

e. An iMessage from BROWN ROBINSON to JOHNSON on or about January 24, 2023, at approximately 6:01 p.m., in which she wrote, “We stop.”

i. Based on my training and experience, and knowledge of this investigation, I believe that in the above message, BROWN ROBINSON was informing JOHNSON that she had been stopped by law enforcement while carrying the approximately 7 kilograms of suspected cocaine JOHNSON had earlier placed in the trunk of her Grey Dodge on or about January 24, 2023.

f. Photographs that appeared to depict BROWN ROBINSON and JOHNSON together, as well as photographs that appeared to depict BROWN ROBINSON and Individual A together.

E. STATUS OF EAST 42ND PLACE PREMISES AS A SUSPECTED DRUG-STASH LOCATION FOR THE JOHNSON DTO

48. Based on my training and experience, and my knowledge of this investigation, I believe that the East 42nd Place Premises was used as a drug-stash location for the JOHNSON DTO between at least in or around September 2022 and in or around January 2023, based on the following:

a. On or about September 8, 2022, as noted by surveilling officers, JOHNSON was seen entering and exiting the East 42nd Place Premises approximately three minutes before making a delivery of cocaine to CI-4 during a controlled drug purchase, as further described in Section III(A)(3), above.

b. On or about September 23, 2022, as noted by surveilling officers, JOHNSON entered and exited the East 42nd Place premises approximately five

minutes before making a delivery of cocaine to CI-4 during a controlled drug purchase, as further described in Section III(A)(4), above.

c. On or about November 17, 2022, as captured by pole-camera footage and noted by surveilling officers, Individual A exited the East 42nd Place Premises carrying a red bag, containing suspected drugs, and placed that bag in BROWN ROBINSON's Grey Dodge. Subsequently, as noted by surveilling officers and corroborated by intercepted phone calls over **Target Phone 4** and toll records for **Target Phone 5**, BROWN ROBINSON delivered the red bag to UM-1 at the Decatur Premises, as further described in Section III(D)(1), above.

d. On or about November 18, 2022, as captured by pole-camera footage, Individual B retrieved a black bag containing suspected drug money from BROWN ROBINSON's Grey Dodge, which was parked outside the East 42nd Place Premises, as further described in Section III(D)(2), above.

e. On or about December 5, 2022, as captured by pole-camera footage and noted by surveilling officers, JOHNSON was seen exiting the East 42nd Place Premises between approximately three and five minutes before meeting with BONAPARTE, from whom law enforcement subsequently recovered crack cocaine and marijuana, as further described in Section III(C), above.

f. On or about December 6, 2022, as captured by pole-camera footage, JOHNSON was seen exiting the East 42nd Place Premises carrying a dark-green duffle bag (containing the **December 2022 Funds**, subsequently seized from Individual B), which JOHNSON placed in the trunk of Individual B's White Mini.

Further, JOHNSON was also seen removing a silver bag and dark-colored bag from the trunk of Individual B's White Mini, which JOHNSON carried back into the East 42nd Place Premises, as further described in Section III(D)(4), above.

g. On or about January 24, 2023, as captured by pole-camera footage, JOHNSON was seen exiting the East 42nd Place Premises carrying a duffle bag (containing approximately 7.095 kilograms of suspected cocaine, subsequently seized from BROWN ROBINSON as further described in Section III(D)(5), above), which JOHNSON placed in the trunk of BROWN ROBINSON's Grey Dodge.

F. LAWRENCE'S INVOLVEMENT IN JOHNSON'S DTO

1. March 2023 Surveillance of LAWRENCE at the East 42nd Place Premises

49. According to footage captured by a pole camera³⁰ previously installed in the vicinity of the East 42nd Place Premises, on or about March 20, 2023, at approximately 1:31 p.m., LAWRENCE³¹ exited a black vehicle and entered the East 42nd Place Premises carrying what appeared to be a white bag, as depicted in the screenshot below:

[CONTINUED ON NEXT PAGE]

³⁰ Through analysis of the video footage captured by the pole mounted camera, I discovered the time provided by the system capturing video evidence was approximately 1 hour and 3 minutes behind the true time. All times in this Affidavit have been corrected to reflect the approximate correct time of observation by the pole mounted camera.

³¹ Law enforcement identified LAWRENCE by comparing images captured on pole-camera footage against LAWRENCE's driver's license photograph, and against body-worn camera footage of LAWRENCE's traffic stop on or about April 14, 2023, detailed further below.



LAWRENCE entering East 42nd Place Premises with white bag

50. At approximately 4:45 p.m., according to pole-camera footage, LAWRENCE exited the East 42nd Place Premises, no longer carrying the white bag that LAWRENCE was seen holding earlier, as depicted in the screenshot below. LAWRENCE then returned to the black vehicle and departed the vicinity of the East 42nd Place Premises:



LAWRENCE exiting East 42nd Place Premises empty-handed

2. JOHNSON's Communications with LAWRENCE on or about April 13, 2023, and Related Surveillance

51. On or about April 13, 2023, at approximately 12:14 p.m., JOHNSON, who was using **Target Phone 4**, had a telephone conversation with LAWRENCE, who was using phone number 773-XXX-6026.³² During the conversation, LAWRENCE told JOHNSON, “when you slow down whatever hit me. I’ll run into you.” JOHNSON replied, “We here.” LAWRENCE then stated, “I mean I got uh, I got uh 1 o’clock I’m finna do right quick with somebody and then I’ll holler...” JOHNSON, replied, “Alright,” and later stated, “Don’t call me no more. You close by.” LAWRENCE replied, “Ok cool.”

a. Based on my training, experience, and knowledge of this investigation, as well as law enforcement’s review of footage from a pole camera installed at or near the East 42nd Place Premises, I believe that in this call, LAWRENCE was attempting to meet with JOHNSON for drug-related activities, at the East 42nd Place Premises. I further believe that when LAWRENCE told JOHNSON, “when you uh slow down whatever hit me. I’ll run into you,” he was advising JOHNSON to call LAWRENCE (*i.e.* “hit me”) whenever JOHNSON was available to meet, and that LAWRENCE would then meet JOHNSON at the East

³² Law enforcement identified LAWRENCE as the user of 773-XXX-6026 in this Affidavit based on the following: (1) a law enforcement database query result, providing “Charles Lawrence” at an address on the 8200 block of South Champlain Avenue, in Chicago, Illinois as the possible user of 773-XXX-6026; and (2) a communication intercepted pursuant to the 4-11-2023 Order, between LAWRENCE and JOHNSON (further detailed below), where the Red Hyundai (believed to be driven by LAWRENCE) departed the East 42nd Place Premises at or about the time that LAWRENCE had told JOHNSON, “I’m pulling off.”

42nd Place Premises (*i.e.* “I’ll run into you”). Additionally, I believe that when JOHNSON replied, “We here,” he was purporting to LAWRENCE that he was already at the East 42nd Place Premises.³³ Finally, I believe that when LAWRENCE told JOHNSON, “I got uh 1 o’clock I’m finna do right quick with somebody and then I’ll holler,” LAWRENCE was advising JOHNSON that he would be delayed in meeting with JOHNSON until he completed an unknown activity with an unknown individual at or about 1:00 p.m.

52. On or about April 13, 2023, at approximately 6:37 p.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with LAWRENCE, who was using phone number 773-XXX-6026. During the conversation, JOHNSON told LAWRENCE, “Shit, we got... slid over here on 93rd to the uh... cigar bar,” to which LAWRENCE replied, “Oh yeah?” JOHNSON then stated, “Yeah I waited on you.” LAWRENCE responded, “You had never called me saying you was back here dog. I, I could, I knew you was backing in there. You said you was gone call me.” In response, JOHNSON stated, “I thought you was doing a 1 o’clock and then coming.” LAWRENCE replied, “Naw... you said you was... call me when you was getting back this way bro. Just hit me then, I’m pulling off.”

a. Based on my training, experience, and knowledge of this investigation, as well as law enforcement’s review of footage from a pole camera

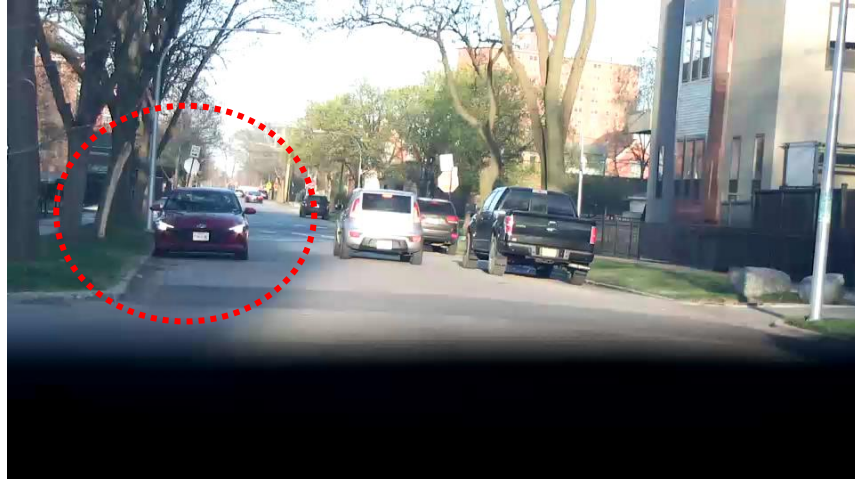
³³ According to pole-camera footage, and cell-site location data for **Target Phone 4** obtained pursuant to the 4-11-2023 Order, at approximately 12:14 p.m., JOHNSON was not, in fact, at the East 42nd Place Premises. According to pole-camera footage, JOHNSON and another individual arrived near the East 42nd Place Premises at approximately 12:45 p.m.

installed at or near the East 42nd Place Premises, I believe that in this call, LAWRENCE had arrived at or about the East 42nd Place Premises in a failed attempt to meet with JOHNSON. I further believe that when JOHNSON told LAWRENCE, “Shit, we got... slid over here on 93rd to the uh... cigar bar,” JOHNSON was informing LAWRENCE that JOHNSON was no longer at the East 42nd Place Premises. In addition, I believe when LAWRENCE stated, “Just hit me then, I’m pulling off,” he was advising JOHNSON to call LAWRENCE whenever JOHNSON was ready to meet, and that LAWRENCE was departing the East 42nd Place Premises (*i.e.* “I’m pulling off”).

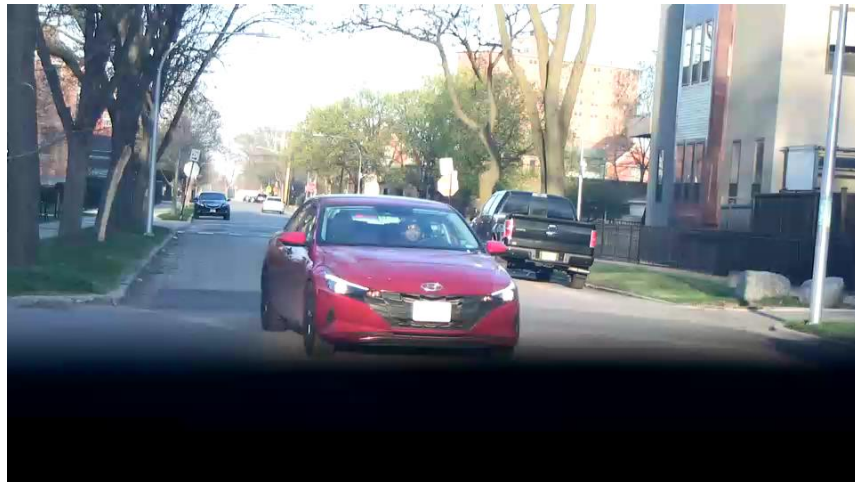
53. On or about April 14, 2023, law enforcement established surveillance in the vicinity of the East 42nd Place Premises. In addition, law enforcement utilized a pole camera previously installed in the vicinity of the East 42nd Place Premises.

54. According to footage from a pole camera in the vicinity of the East 42nd Place Premises, on or about April 13, 2023, at approximately 6:34 p.m., a red Hyundai sedan bearing a Texas license plate (the “Red Hyundai”)³⁴ arrived near or about the East 42nd Place Premises. Further, at approximately 6:35 p.m., the Red Hyundai departed the premises, as depicted in the below screenshots of pole-camera footage:

³⁴ Based on records obtained Texas Department of Motor Vehicles, the owner of the Red Hyundai was listed as “Hertz Vehicles.” On or about March 28, 2023, the FBI learned through a representative of Hertz that the Red Hyundai was rented by LAWRENCE. As noted below, LAWRENCE was confirmed as the driver of the Red Hyundai during a traffic stop on or about April 14, 2023.



LAWRENCE arriving at East 42nd Place Premises in Red Hyundai



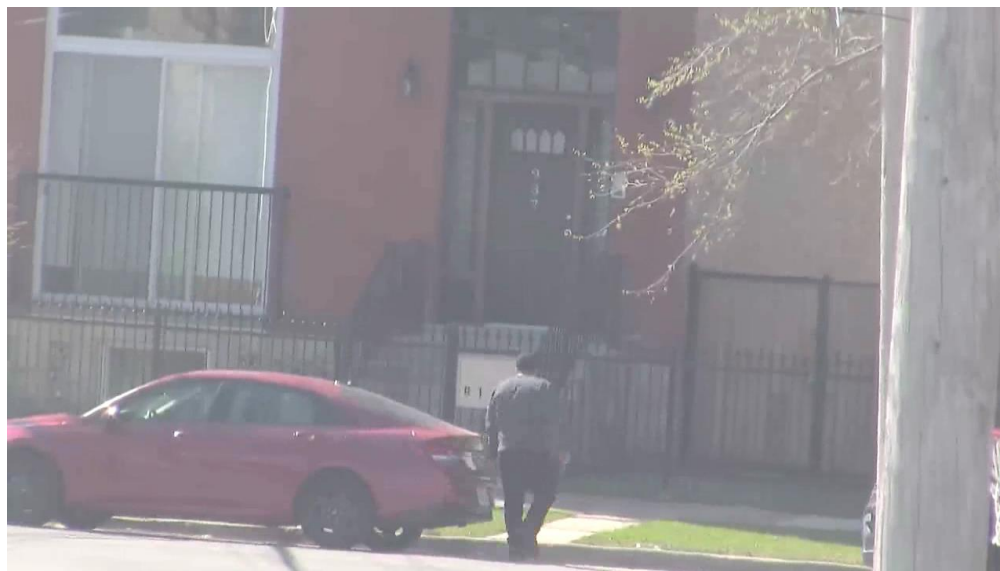
LAWRENCE departing East 42nd Place Premises in Red Hyundai

3. April 14, 2023 Surveillance of LAWRENCE

55. According to footage from a pole camera in the vicinity of the East 42nd Place Premises, on or about April 13, 2023, at approximately 11:45 p.m., JOHNSON and Individual E were observed entering the East 42nd Place Premises. Based on my review of pole-camera footage, and observations by surveilling officers, I believe that JOHNSON and Individual E remained inside of the East 42nd Place Premises until following events transpired on or about April 14, 2023.

56. The next day, on or about April 14, 2023, law enforcement established surveillance in the vicinity of the East 42nd Place Premises. In addition, law enforcement utilized a pole camera previously installed in the vicinity of the East 42nd Place Premises.

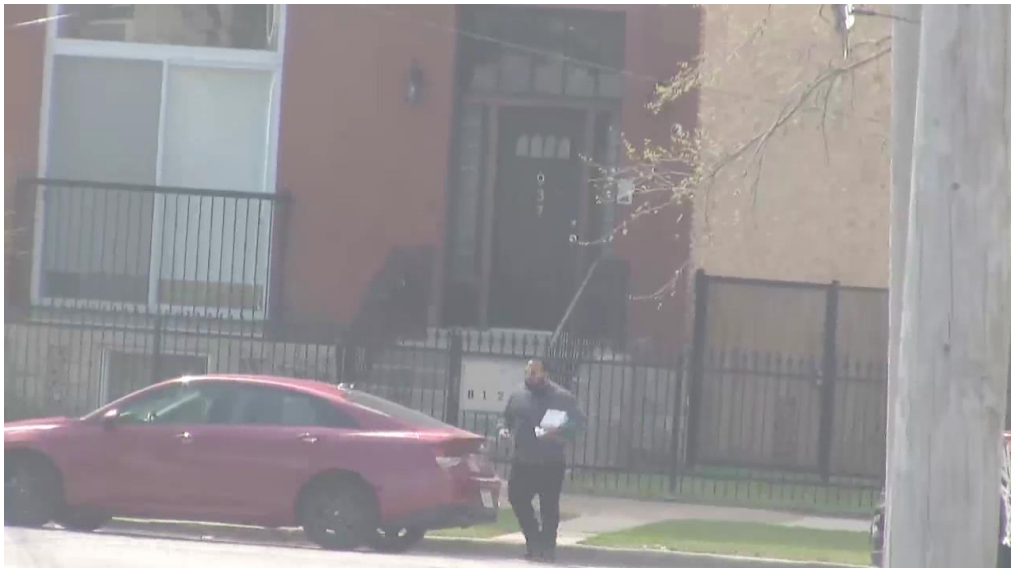
57. According to pole-camera footage, at around 10:15 a.m., LAWRENCE (who, as noted below, was positively identified by his driver's license during a traffic stop by law enforcement) arrived near the East 42nd Place Premises in the Red Hyundai, exited the vehicle carrying what appeared to be vehicle keys, and waited at the front door of the premises prior to making entry, as depicted in the below screenshot of pole-camera footage:



LAWRENCE Exiting Red Hyundai and Entering East 42nd Place Premises

58. At approximately 11:18 a.m., as further captured by pole-camera footage, LAWRENCE exited the East 42nd Place Premises carrying a white box, believed to be a United States Postal Service “Priority Mail” box. LAWRENCE then

entered the driver's compartment of the Red Hyundai with the white box, as depicted in the below screenshot of pole-camera footage:



***LAWRENCE Exiting East 42nd Place Premises and
Entering Red Hyundai holding white box***

59. Following LAWRENCE's departure, at approximately 11:22 a.m., surveilling officers observed LAWRENCE park the Red Hyundai in a lot near the intersection of East 44th Street and South Ellis Avenue, in Chicago, Illinois. Following the Red Hyundai's departure from the parking lot, FBI task force officers (TFOs) cross-sworn with the Chicago Police Department (CPD) conducted a traffic stop of LAWRENCE as he was driving in the Red Hyundai, as detailed below.

60. Further, as captured by pole-camera footage, at approximately 11:42 a.m., JOHNSON exited the East 42nd Place Premises, entered a black Ford F-150 bearing an Illinois temporary license plate (the "Black Ford"),³⁵ and departed the

³⁵ According to Illinois Secretary of State (ILSOS), the Black Ford was registered to an individual who, based on my knowledge of this investigation, physical and video surveillance observations, and intercepted communications pursuant to the 4-11-23 Order, I believe is JOHNSON's son.

area. An hour later, at approximately 12:41 p.m., Individual E exited the East 42nd Place Premises, entered a dark-colored Range Rover, and departed the area as well.

4. Arrest of LAWRENCE and Seizure of April 2023 Funds and Loaded Taurus 9mm Firearm (Count Four)

61. On or about April 14, 2023, at approximately 11:42 a.m., FBI TFOs driving in an unmarked CPD vehicle observed LAWRENCE (within the Red Hyundai) using a cellular phone while operating a motor vehicle, and also saw LAWRENCE fail to use a turn signal while making a westbound turn onto E. 47th Street from South Ellis Avenue, in Chicago, Illinois. Upon observing these infractions, TFOs activated their emergency lights, and as the Red Hyundai was slowing down, TFOs saw LAWRENCE, who was the sole occupant and driver of the vehicle, leaning towards the front passenger's seat. The Red Hyundai ultimately pulled over at or about 226 East 47th Street in Chicago, Illinois.

62. Once the Red Hyundai was stopped, TFOs approached the vehicle, and a TFO observed a white box on the front passenger seat of the vehicle, as well as a black satchel on the passenger floorboard. TFOs asked LAWRENCE to exit his vehicle. In response, LAWRENCE asked for a CPD sergeant to respond to the scene. While TFOs waited for a sergeant's arrival, LAWRENCE placed the vehicle in drive and began to move the vehicle forward. To ensure officer safety, TFOs again instructed LAWRENCE to exit the vehicle.

63. According to TFOs' body-worn camera footage, while exiting the vehicle, LAWRENCE was asked if he had a weapon. LAWRENCE responded affirmatively and after LAWRENCE advised TFOs of the location of the firearm, an uncased

Taurus 9mm semi-automatic handgun was recovered from the driver's side door. Law enforcement later confirmed that LAWRENCE was a convicted felon.³⁶ The handgun, according to the TFOs who recovered it, bore an unknown amount of live ammunition in the magazine, and one live round in the chamber. Following the recovery of the handgun, TFOs began conducting a search of the vehicle.

64. Based on my conversations with the TFOs who conducted the traffic stop, and my review the TFOs' body-worn camera video, I know the following:

a. During the traffic stop, LAWRENCE provided officers with an Illinois driver's license bearing his name and photograph. While searching the vehicle, a TFO located an empty white box (which appeared to be a United States Postal Service "Priority Mail" box) on the passenger seat of the vehicle, as well as a black satchel containing approximately \$26,400 (the "**April 2023 Funds**") on the passenger-side floorboard, as depicted in the following screenshot of body-worn camera footage:

[*CONTINUED ON NEXT PAGE*]

³⁶ According to law enforcement records, on or about August 8, 2011, LAWRENCE was previously convicted for felony possession of a controlled substance in the Circuit Court of Cook County, Illinois, and sentenced to 24 months' probation.



White “Priority Mail” box (seat) and black satchel (floorboard)

65. After seizing the Taurus 9mm handgun and **April 2023 Funds**, TFOs placed LAWRENCE under arrest for being a felon in possession of a firearm, and then relocated LAWRENCE and the seized evidence to CPD’s 2nd District facility.

66. Based on my review of CPD police reports and body-worn camera footage for LAWRENCE’s arrest on or about April 14, 2023, and my conversations with the TFOs that arrested and interviewed LAWRENCE, I know the following:

a. Following his arrest, LAWRENCE was taken to the CPD’s 2nd District for booking. While there, and as captured on body-worn camera footage, at approximately 12:19 p.m., the arresting officers advised LAWRENCE of his *Miranda* rights and asked if LAWRENCE was willing to answer questions. LAWRENCE initially invoked his right to counsel, and the interview was terminated. Thereafter, according to a report prepared by CPD, LAWRENCE asked to speak with one of the arresting officers (a CPD sergeant cross-sworn as a TFO with the FBI). As captured on body-worn camera footage, the CPD sergeant then spoke with LAWRENCE, who stated that he was aware of his rights and now wanted to speak with the sergeant,

but off camera. In response, the sergeant deactivated his body-worn camera. Then, according to CPD police reports, LAWRENCE told the officers that the **April 2023 Funds** belonged to someone else, and that the money was to be used as a deposit for five “bricks” (*i.e.*, kilograms of drugs).

b. After this exchange, at approximately 2:02 p.m., a CPD asset forfeiture officer interviewed LAWRENCE to determine the origins and ownership of the **April 2023 Funds**, along with the CPD sergeant. As captured on body-worn camera footage, LAWRENCE again confirmed that he had been read and understood his rights. When asked, “First of all, is that your money?,” LAWRENCE replied, “No it’s not.” He later added, “It’s in my possession, so I’m responsible for it.” An officer then asked, “Okay, so it’s someone else’s money?” LAWRENCE responded, “Yeah, it was for a vehicle. I was telling him... I told him it was for a vehicle for a situation, uh, somebody basically, they was, uh, going through some rough times and they wanted to, uh, get some money, they wanted to borrow some money for some drugs.” LAWRENCE was then asked, “How much money is in the bag, approximately?” He responded, “I told him it was around, like, about uh, probably, about 26.” An officer asked, “26 thousand?” LAWRENCE replied, “Yeah, 26 thousand.”

c. According to CPD inventory records, the **April 2023 Funds** were subsequently counted and determined to be approximately \$26,400 in cash.

5. K9 Examination of the April 2023 Funds

67. Based on my training and experience, my conversations with FBI TFOs, and my review of CPD reports, I know the following:

a. On or about April 14, 2023, CPD K9 Police Officer (Officer Dougan, Star #13953) and CPD K9 (Trooper) responded to CPD's 2nd District to examine the **April 2023 Funds**.

b. According to information obtained from CPD, Trooper is certified in narcotic detection by the ILETSB. Trooper was certified on or about December 15, 2022, for detecting the odor of heroin, cocaine, crack cocaine, methamphetamine, and marijuana. ILETSB implements a number of distractors during their certifications. Those distractors fall into three categories: food items, toys, and miscellaneous items (*i.e.*, plastic bags, duct tape, evidence bags, etc.). Trooper is also trained to indicate to the presence of such substances or their scents by alerting to the item he is sniffing. According to ILETSB, drug detection canines' (such as Trooper's) training in narcotics detection includes searching for narcotics in various containers, buildings, and vehicles in both indoor and outdoor spaces.

c. Officer Dougan and FBI TFO Guerrero met at CPD's 2nd District, and the officers (including K9 Trooper) proceeded to the community room of the 2nd District facility. Upon their arrival, K9 Trooper conducted a systematic search of the community room and found it to be free of narcotic odor. Once completed, FBI TFO Guerrero was instructed to place the **April 2023 Funds** inside of the community room, in an area unknown to the K9 team.

d. Officer Dougan and Trooper then immediately re-entered the community room. Officer Dougan gave Trooper the command to search for narcotics scent, and Trooper, again, conducted a systematic search of the community room.

During Trooper's search, Officer Dougan observed a behavioral change in Trooper's demeanor. Trooper's sniff pattern became more defined and his breathing became more intense. Trooper then sat and stared at a large bundle of U.S. Currency (the **April 2023 Funds**), giving a positive indication for the presence of narcotic odor.³⁷

6. Pertinent Intercepted Communications Following the Arrest of LAWRENCE

68. On or about April 14, 2023, at approximately 12:59 p.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with Individual E, who was using phone number 312-XXX-5402.³⁸ As noted previously, Individual E was surveilled: (i) entering the East 42nd Place Premises with JOHNSON the evening before LAWRENCE retrieved the **April 2023 Funds**; and (ii) leaving the East 42nd Place Premises approximately 80 minutes after LAWRENCE exited with the **April 2023 Funds**.

69. During the conversation, JOHNSON told Individual E, "Chuck just called me from back of a paddy wagon." Individual E replied, "Huh!" JOHNSON continued, "He say he got pulled over after he left." Individual E asked, "For what?" JOHNSON replied, "He say he had a gun on him." JOHNSON continued, "So we won't see him until... his bond won't be until tomorrow anyway now. And he had that money

³⁷ On or about June 6, 2023, law enforcement learned that the Circuit Court of Cook County released the **April 2023 Funds** back to LAWRENCE on or about May 17, 2023; finding no probable cause to maintain seizure of said funds. The Circuit Court of Cook County was not made aware of the above-mentioned facts regarding LAWRENCE's intercepted calls, officers' surveillance preceding the seizure of the **April 2023 Funds**, or other relevant facts.

³⁸ Law enforcement identified Individual E as the user of 312-XXX-5402 in this Affidavit based on T-Mobile subscriber information listing "[Individual E]" of 9771 S. Oglesby Ave, Chicago, Illinois as the subscriber of 312-XXX-5402.

on him.” As the conversation continued, JOHNSON stated, “If you just going to meet somebody. I don’t know why. If you wasn’t going to meet them, why you gotta take them? Why you got to take the bread? That’s the kind of stuff I was saying. You moving doing stuff too secretly... like... what’s the purpose? Anytime you come there you should be ready to go. Bam! I’m going to them, come back. Why you take it and put over somewhere else. What you think it’s going to change? That’s why I say it ain’t... You wasn’t on your way to them cause you wouldn’t have been in no 2nd District.”

a. Based on my training, experience, and knowledge of this investigation, I believe in this call, JOHNSON and Individual E were speaking to each other about the April 14, 2023 arrest of LAWRENCE, and his possession of a firearm and the **April 2023 Funds**. I believe that when JOHNSON told Individual E, “Chuck just called me from back of a paddy wagon,” he was informing Individual E that LAWRENCE (“Chuck,” an abbreviated version of LAWRENCE’s first name, Charles) had called JOHNSON using a cellular phone that LAWRENCE had in his possession during CPD’s prisoner transport to CPD’s 2nd District.³⁹ I further believe that when JOHNSON stated, “So we won’t see him until... his bond won’t be until tomorrow anyway now. And he had that money on him,” JOHNSON was

³⁹ According to agents’ review of communications intercepted over **Target Phone 4** and **Target Phone 5** pursuant to the 4-11-23 Order, on or about April 14, 2023, law enforcement did not intercept a communication between JOHNSON and LAWRENCE detailing LAWRENCE’s arrest. As a result, to the extent they discussed the matter, I do not believe that LAWRENCE communicated with JOHNSON about his arrest over either **Target Phone 4** or **Target Phone 5**.

acknowledging his knowledge of the **April 2023 Funds** that were seized from LAWRENCE. Additionally, I believe that when JOHNSON stated, “If you wasn’t going to meet them, why you gotta take them? Why you got to take the bread,” JOHNSON was referring to LAWRENCE, and asking why LAWRENCE would take the **April 2023 Funds** (*i.e.*, “bread”) if LAWRENCE wasn’t going to meet with the recipients of the **April 2023 Funds**, believed to be JOHNSON’s drug suppliers (*i.e.*, “going to meet them”). I also believe that when JOHNSON stated, “anytime you come there you should be ready to go. Bam! I’m going to them, come back,” JOHNSON was again referring to LAWRENCE, commenting to Individual E about how LAWRENCE should have delivered the **April 2023 Funds** to their intended recipient while avoiding detection or apprehension by law enforcement.

70. On or about April 14, 2023, at approximately 6:29 p.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with Chicago Police Department’s 2nd District, who was using phone number 312-XXX-8366.⁴⁰ During the conversation, CPD stated, “Second district, officer Foster.” JOHNSON replied, “Hi, how you doing. I’m calling about um Charles Lawrence.” As the conversation continued, CPD stated, “He has to go to court tomorrow sir.” JOHNSON replied, “Ok.” JOHNSON stated, “he was doing uhh a bank drop for us. Do we get the property? Do we have to go to court?” CPD stated, “You have to go to court for all that sir.”

⁴⁰ According to a Google search of 312-XXX-8366, the number was associated with CPD’s 2nd District, which is located at 5101 S. Wentworth Ave in Chicago, IL.

a. Based on my training, experience, and knowledge of this investigation, I believe in this call, that JOHNSON called CPD's 2nd District to inquire about the status of LAWRENCE's arrest, as well as the **April 2023 Funds** that were seized from LAWRENCE. I further believe that when JOHNSON stated, "he was doing uhh a bank drop for us. Do we get the property? Do we have to go to court," he was acknowledging a joint possession with LAWRENCE of the **April 2023 Funds**. Further, I believe this statement corroborates JOHNSON's original possession of the **April 2023 Funds**, prior to LAWRENCE's departure from the East 42nd Place Premises with the white USPS Priority Mail box, as captured on pole-camera footage excerpted and discussed above.

71. On or about April 17, 2023, at approximately 5:48 p.m., JOHNSON who was using **Target Phone 4**, had a conversation with LAWRENCE who was using 773-XXX-6026. During the conversation, JOHNSON asked LAWRENCE, "Did you tell him about the uh... cash?" LAWRENCE responded, "Yup I told him too. He said he got somebody else that do that, as far as the forfeiture the cash." As the conversation continued, JOHNSON stated, "Yeah but I don't understand how they took yo' money and didn't count it in front of you. LAWRENCE responded, "Right."

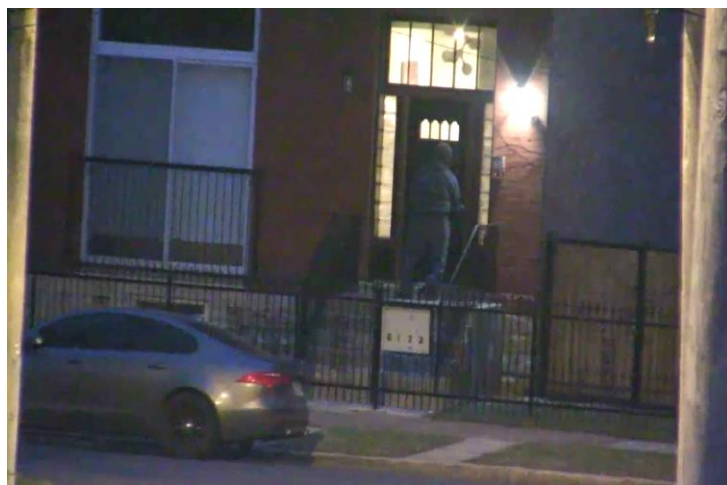
a. Based on my training, experience, and knowledge of this investigation, I believe that when JOHNSON asked LAWRENCE, "Did you tell him about the uh... cash," he was asking LAWRENCE if LAWRENCE had spoken to an unknown third party about the **April 2023 Funds**. Further, I believe that when LAWRENCE responded, "Yup I told him too. He said he got somebody else that do

that, as far as the forfeiture the cash,” he was also referencing the **April 2023 Funds**, and that the unknown third party had knowledge another individual that concerned themselves with forfeited currency. Finally, I believe that when JOHNSON stated, “I don’t understand how they took yo’ money and didn’t count it in front of you,” he was expressing his discontent with CPD not counting the **April 2023 Funds** in front of LAWRENCE when the funds were seized.

G. JONES’S INVOLVEMENT IN JOHNSON’S DTO

1. December 2022 Surveillance of JONES at the East 42nd Place Premises

72. According to footage captured by a pole camera previously installed in the vicinity of the East 42nd Place Premises, on or about December 22, 2022, at approximately 6:46 a.m., JONES⁴¹ exited a silver Jaguar vehicle (“Silver Jaguar”) and appeared to enter the East 42nd Place Premises while using a key (see below). Then, at approximately 7:06 a.m., JONES exited the East 42nd Place Premises.



JONES entering East 42nd Place Premises

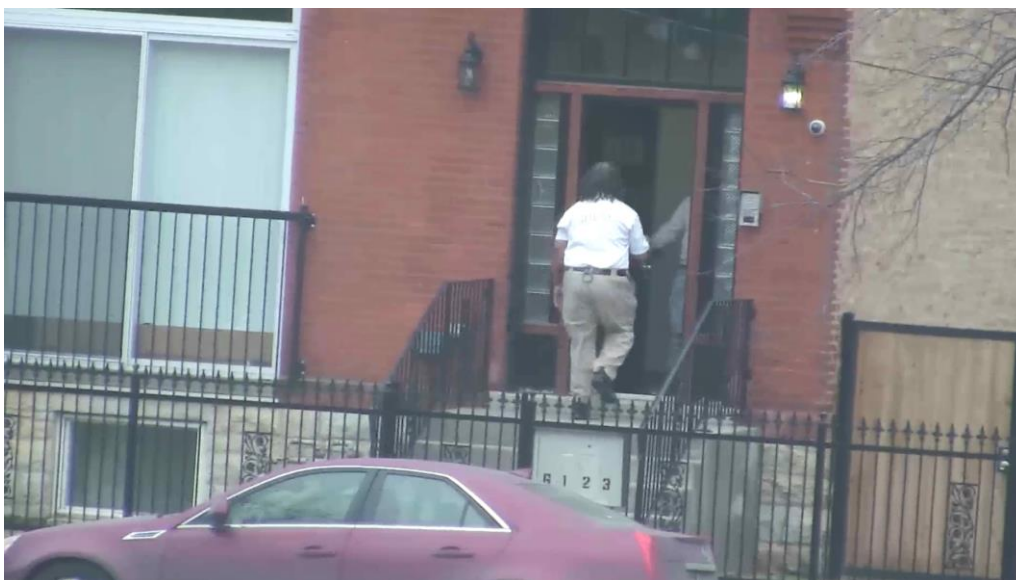
⁴¹ Law enforcement identified JONES by comparing images captured on pole-camera footage against JONES’s driver’s license photograph, and against body-worn camera footage of JONES’s traffic stop on or about May 2, 2023, detailed further below.

73. As further captured on pole-camera footage, on or about December 30, 2022, at approximately 2:37 p.m. JONES approached the East 42nd Place Premises, pressed what appeared to be an intercom (or doorbell), and waited on the porch of the premises. At approximately 2:38 p.m., JONES walked down the porch stairs, and shortly thereafter, Individual A (who was seen exiting the East 42nd Place Premises with JOHNSON minutes before JOHNSON's delivery of cocaine to CI-4 on or about September 23, 2022, as discussed above) opened the door. Then, at approximately 2:39 p.m., JONES entered the East 42nd Place Premises, appearing to be empty handed, as noted in the screenshots below:



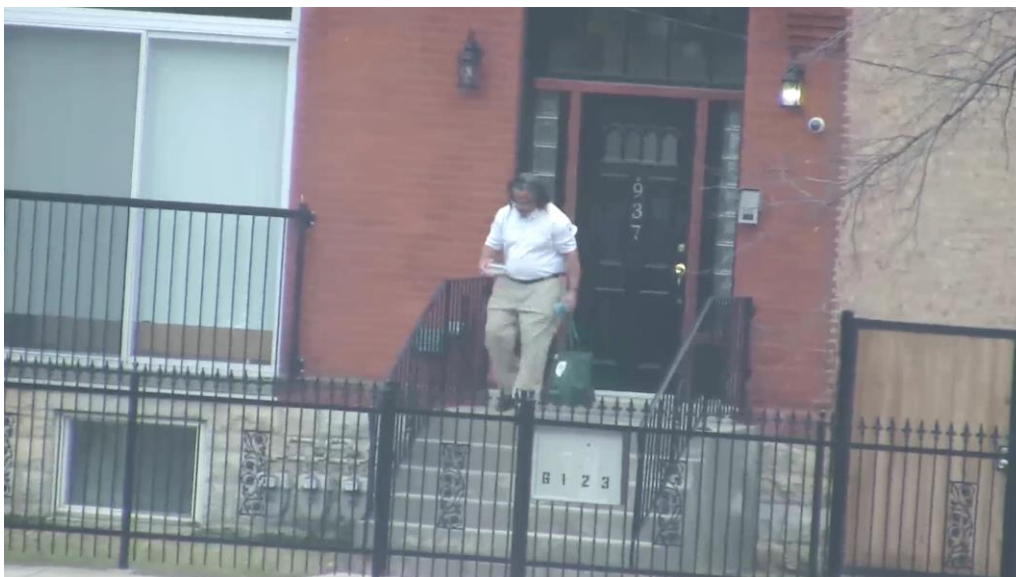
Individual A opening the door of the East 42nd Place Premises

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JONES entering the East 42nd Place Premises

74. At approximately 2:50 p.m., captured on pole-camera footage, JONES exited the East 42nd Place Premises, now carrying a green bag, as noted in the screenshots below:



JONES exiting East 42nd Place Premises with a green bag

2. JOHNSON's Intercepted Communications with JONES and Individual E on or about April 11, 2023

75. On or about April 11, 2023, at approximately 10:00 p.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with JONES, who was using phone number 312-XXX-8719.⁴² During the conversation, JONES asked JOHNSON, “Ray not with you?” JOHNSON replied, “Nah.” JONES then stated, “Oh I been calling him man. To have you hit me on the uh... I wanna call you on the work number, so I don’t know...” JOHNSON, replied, “Aight.”

a. Based on my training, experience, and knowledge of this investigation, as well as law enforcement’s review of pole-camera footage, I believe that in this call, JONES was informing JOHNSON that JONES was contacting “Ray” (believed to be Individual E), in order for “Ray” to have JOHNSON contact JONES on JONES’s alternate cellular device (*i.e.*, “the work number”).

76. On or about April 11, 2023, at approximately 10:06 p.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with Individual E, who was using phone number 312-XXX-5402. During the conversation, Individual E sent a text message to JOHNSON stating, “DJ work 832XXX4525?”

a. Based on my training, experience, and knowledge of this investigation, I believe that Individual E had sent JONES’s additional cellular

⁴² Law enforcement identified JONES as the user of 312-XXX-8719 based on the following: (1) subscriber information provided by T-Mobile, listing “Darrell Jones” at an address on the 1700 block of East 84th Place in Chicago, Illinois; (2) a law enforcement database query result, providing “Darrell Jones” at an address on the 1700 block of East 84th Place in Chicago, Illinois as the possible user of 312-XXX-8719; and (3) a search of the aforementioned phone number in CashApp revealed an account with the username “Darrell Jones.”

device's number to JOHNSON. Additionally, I believe that "DJ" was a reference to either a nickname for JONES, and/or the initials of JONES' first and last name. Finally, I believe that JOHNSON received this electronic communication from Individual E, at the request of JONES (as mentioned in paragraph 75, above).

3. Individual B's Intercepted Communications with JOHNSON in or around April and May 2023 About a Drug Payment

77. According to records obtained from the Franklin County (Ohio) Clerk of Court, on or about April 25, 2023, Individual B was arrested on a bond-forfeiture warrant relating to an earlier criminal case pending against her unlawful possession of a controlled substance, in violation of Ohio Revised Code Section 2925.11.

78. On or about April 28, 2023, at approximately 6:02 p.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with Individual B, who was using phone number 614-XXX-4923.⁴³ During the conversation, Individual B told JOHNSON, "These motherf*ckers. They... I told you I need my f*ckin money! These mother*ckers snatched me up for a whole motherf*ckin four days bro." JOHNSON asked, "Straight up?" Individual B responded, "Yeah, I told you... I... keep this sh*t

⁴³ Law enforcement identified Individual B as the user of 614-XXX-2023 in this Affidavit based on the following: (1) my comparison of the caller's voice heard in the captioned intercepted communication with JOHNSON, previous intercepted communications pursuant to the 11-16-22 Order between JOHNSON and Individual B (using a different cellular device bearing phone number 614-XXX-0463), and my review of CPD body worn camera, capturing CPD's encounter with Individual B during a seizure of approximately \$300,050 of suspected drug-related funds on or about December 6, 2022; and (2) the similarity in context of the caller's statement, "these mother*ckers snatched me up for whole mother*ckin 4 days," and records obtained from the Franklin County (Ohio) Clerk of Court, which detailed Individual B's release from law enforcement custody on or about April 28, 2023, following her arrest on or about April 25, 2023.

cute with you... dude if it ain't cute... I need my money." Individual B then asked, "are you finished with those cars?" JOHNSON answered, "Yeah, I been, I but you know what? I been calling you on your other phone and I'm like man... I was worried like a motherf*cker." Individual B responded, "I don't have it... I don't have anything dude. My dad had to go give these motherf*ckers some money. You know, cuz you know I'm down that money you owe. I'm down the money the police owe, and I'm down the money my nephew owes. These motherf*ckers are like 'naw you got to run us some money." I had to give these motherf*ckers five-hundred thousand." JOHNSON replied, "Yeah I was like god damn, I can't get no answer out of her." As the conversation continued, Individual B stated, "please, please, please I need money, tell me you got money for me." JOHNSON replied, "yeah, yeah, I... I send him up there uh soon..." JOHNSON then stated, "well I send em ah Tuesday cause that, he... he, that's the only day we can get off." As the conversation continued, Individual B stated, "if he comes Tuesday, um that would be good cause I'm hoping to be able to get... grab something too, so hopefully I have something for him too when he comes Tuesday." JOHNSON replied, "Ok cool."

a. Based on my training, experience, and knowledge of this investigation, I believe that when Individual B stated, "these motherf*ckers. They... I told you I need my f*ckin money! These mother*ckers snatched me up for a whole motherf*ckin four days bro," that Individual B was advising JOHNSON that she needs drug re-supply money that JOHNSON owed to Individual B. Additionally, I believe that Individual B was advising JOHNSON that she had recently been

arrested and jailed for approximately four days. I believe when Individual B asked, “are you finished with those cars,” that Individual B was asking JOHNSON, using coded language, whether he was finished distributing a previous supply of drugs (*i.e.*, “those cars”). I also believe that when Individual B stated, “I don’t have it,” she was referring to herself not having her previous cellular device, bearing phone number 614-XXX-0463, which was intercepted on **Target Phone 4** pursuant to the 11-16-22 Order. I further believe that when Individual B stated, “You know, cuz you know I’m down that money you owe. I’m down the money the police owe, and I’m down the money my nephew owes. These motherf*ckers are like ‘naw you got to run us some money.” I had to give these motherf*ckers five-hundred thousand,” she was advising JOHNSON that she was in debt due to the drug-related money that JOHNSON currently owes her, the seizure of the **December 2022 Funds** by law enforcement, and other drug-related money that Individual B’s nephew owed her. Furthermore, I believe that Individual B was advising JOHNSON that her drug suppliers (*i.e.*, “these motherf*ckers”) were demanding Individual B pay a drug-related debt that she owed (*i.e.*, “naw you got to run us some money”). Finally, I believe that Individual B was informing JOHNSON that she had to pay her drug suppliers approximately \$500,000 in order to satisfy her drug-related debt (*i.e.*, “I had to give these motherf*ckers five-hundred thousand”). I believe when JOHNSON stated, “well I send em ah Tuesday cause that, he... he, that’s the only day we can get off,” that JOHNSON was informing Individual B that JOHNSON would send an individual (believed to be JONES, based on the subsequent events detailed below) to Individual B’s location on or about May

2, 2023, with the drug-related money that JOHNSON owed. Further, I believe that when Individual B stated, “if he comes Tuesday, um that would be good cause I’m hoping to be able to get... grab something too, so hopefully I have something for him too when he comes Tuesday,” she was expressing her agreement with JONES delivering JOHNSON’s drug debt to Individual B on or about May 2, 2023. Further, I believe that Individual B was advising JOHNSON that she was hoping to purchase a new supply of drugs (*i.e.*, “I’m hoping to be able to get... grab something too”), and that Individual B was hoping to be able to provide JONES with an undetermined amount of drugs to return to JOHNSON on May 2, 2023 (*i.e.*, “hopefully I have something for him too when he comes Tuesday”).

79. On or about May 2, 2023, at approximately 9:33 a.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with Individual B, who was using phone number 614-XXX-4923. During the conversation, JOHNSON told Individual B, “He’s getting ready to leave out at 12.” Individual B responded, “Perfect. Great. Good time. Good time. Alright, let me know when you leave out, please.”

a. Based on my training, experience, and knowledge of this investigation, as well as law enforcement’s review of concealed surveillance camera footage, I believe that in this call, JOHNSON was advising Individual B that JONES would be leaving with the suspected drug-related money (**May 2023 Funds**) at approximately 12:00 p.m. on May 2, 2023, and driving to Individual B’s location.⁴⁴

⁴⁴ According to Franklin County (OH) Clerk of Court records, Individual B is believed to have been ordered to house arrest (with GPS monitoring) by the Honorable Judge Julie M. Lynch

80. On or about May 2, 2023, at approximately 11:50 a.m., JOHNSON who was using **Target Phone 4**, had a telephone conversation with Individual B, who was using phone number 614-XXX-4923. During the conversation, JOHNSON asked Individual B, “Hey Sis, can I send him a check for twenty?” Individual B responded, “Yeah please.” As the conversation continued, Individual B asked, “Okay. So what are you sending him? sixty plus? Or you sendin him seventy plus twenty? Where you sendin, so I can know?” JOHNSON replied, “I’m sendin sixty, plus twenty.” Individual B then stated, “it’s more than that, but I understand.” Individual B then continued, “Cuz then your ticket was eighty-seven five, so what is you doin?” JOHNSON stated, “sixty-five and twenty.” Individual B replied, “so then you’re still twenty-seven down.” JOHNSON stated, “Oh well imma have to Zelle you that then.”

a. Based on my training, experience, and knowledge of this investigation, as well as law enforcement’s review of concealed camera surveillance footage, I believe that in this call, JOHNSON was asking Individual B if he could send Individual B a \$20,000 check in addition to approximately \$65,000 in cash for a suspected drug payment. I believe when Individual B stated, “so then you’re still twenty-seven down,” that Individual B was advising JOHNSON that after he had paid \$85,000, JOHNSON would still owe approximately \$2,700 to Individual B. Further, I believe that when JOHNSON stated, “Oh well imma have to Zelle you that

on or about April 26, 2023, and confined to an address on the 3300 block of Compton Drive in Columbus, Ohio.

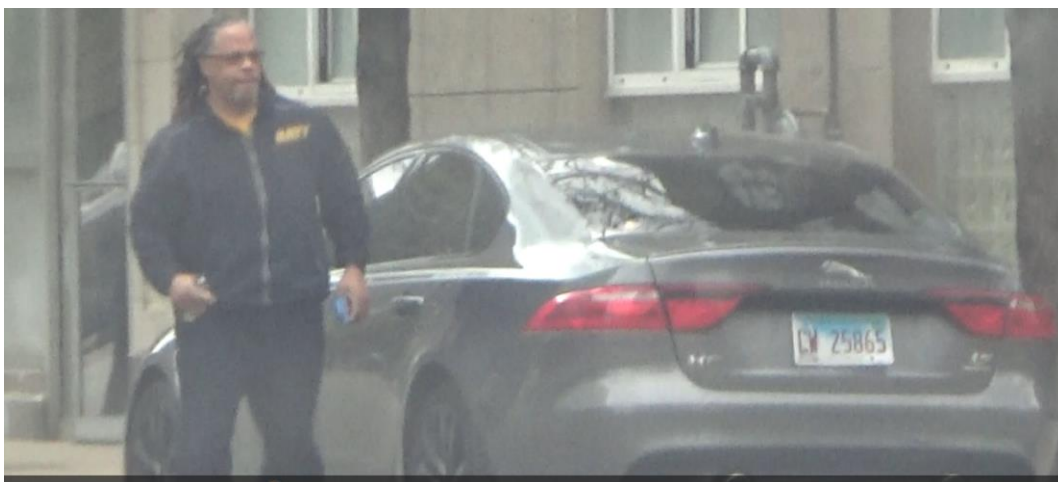
then,” he was advising Individual B that he would send Individual B the remaining \$2,700 in suspected drug debt through a “Zelle” transfer.

4. May 2, 2023 Surveillance of JONES and JOHNSON

81. On or about May 2, 2023, law enforcement established surveillance in the vicinity of 1844 S. Michigan Avenue in Chicago, Illinois (the “1844 S. Michigan Premises”). In addition, law enforcement established surveillance in the vicinity of 1127 James Peter Court, in Darien, Illinois. Finally, law enforcement utilized video and photo cameras in support of their established physical surveillance.

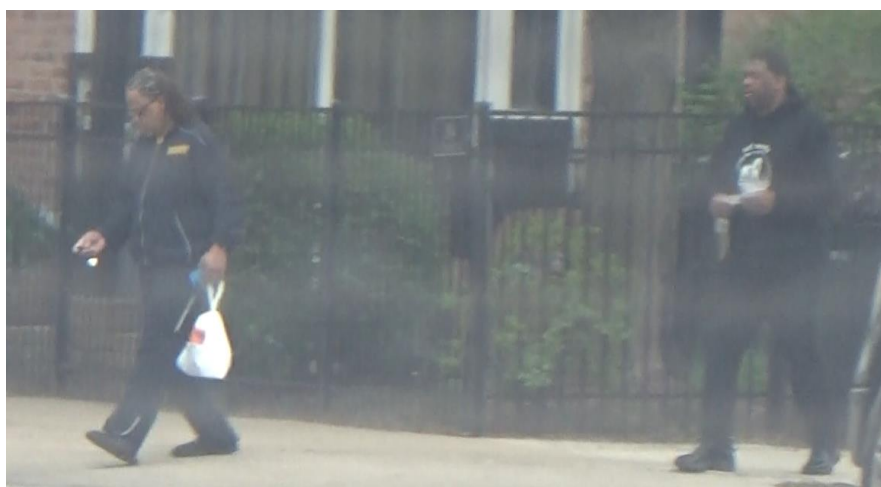
82. According to surveilling officers, at approximately 10:25 a.m., JOHNSON departed 1127 James Peter Court, in the Black Ford. At approximately 10:58 a.m., JOHNSON arrived at or about the 1844 S. Michigan Premises in the Black Ford. JOHNSON then exited the Black Ford, retrieved a black jacket from the rear compartment of the vehicle, and entered an external gate of the 1844 S. Michigan Premises.

83. At approximately 11:18 a.m., the Silver Jaguar arrived at or about the 1844 S. Michigan Premises. JONES (who, as noted below, was later positively identified by his driver’s license during a traffic stop by law enforcement) exited the vehicle wearing a dark-colored track suit, with “NAVY” lettering, and soon after entered the external gate of the 1844 S. Michigan Premises. While entering the 1844 S. Michigan Premises, JONES could be seen holding what appeared to be a cellular phone and vehicle keys, as depicted in the below screenshot of surveillance-video footage:



JONES Exiting Silver Jaguar and Entering 1844 S. Michigan Premises

84. At approximately 11:43 a.m., JONES and JOHNSON exited the external gate of the 1844 S. Michigan Premises. JONES was observed carrying what appeared to be a white plastic bag (“White Bag”), in his left hand, and vehicle keys in his right hand, as depicted in the below screenshot of pole-camera footage:



JONES (left) and JOHNSON (right) exiting 1844 S. Michigan Premises

a. According to surveillance video captured of JONES and JOHNSON’s exit from the 1844 S. Michigan Premises, immediately following JONES and JOHNSON’s exit of the 1844 S. Michigan Premises, JONES was observed by surveilling officers placing the White Bag in the trunk of the Silver Jaguar. JONES

then opened the rear driver-side, and appeared to retrieve a dark-colored backpack. Moments later, JONES opened the trunk of the Silver Jaguar, retrieved the White Bag, and walked towards the Black Ford vehicle. Upon his arrival to the Black Ford, JONES appeared to place items into the passenger side of the Black Ford. Following this observation, JONES entered the driver's compartment of the Black Ford.

85. At approximately 11:47 p.m., JONES departed from the 1844 S. Michigan Premises in the Black Ford.

5. Vehicle Stop and Seizure of May 2023 Funds from JONES (Count Five)

86. On or about May 2, 2023, Indiana State Police ("ISP") troopers, at the direction of surveilling FBI agents, conducted a traffic stop of JONES. The facts below are based on the following sources: my review of body-worn and dash-camera footage obtained from ISP; reports and documents obtained from ISP; and conversations with ISP troopers that were present for the traffic stop.

a. At approximately 2:42 p.m., an ISP trooper, driving in a marked police car, observed the Black Ford traveling above the posted speed limit of 60 miles per hour. In addition, the trooper observed the Black Ford following the vehicle in front of it too closely, with only approximately two vehicle lengths between the two cars. The trooper activated his emergency lights, and ultimately stopped the Black Ford at or about U.S. 30 and County Road 350 W in Indiana. Another ISP trooper provided assistance with the traffic stop.

87. Once the Black Ford was stopped, the troopers approached the vehicle, and JONES, who was the sole occupant and driver of the vehicle, was asked for his

driver's license and registration. JONES provided an Illinois driver's license bearing his name, as well as a temporary vehicle registration for the Black Ford. JONES then advised the troopers that the Black Ford was a "loaner" vehicle from a dealership. During the interaction with JONES and the Black Ford, an ISP trooper observed a dark-colored backpack and a shopping-style plastic bag inside of the vehicle.

88. One of the troopers performed Bureau of Motor Vehicle (BMV) checks on JONES and the Black Ford; a return showed JONES had an outstanding warrant out of Douglas County, Georgia for simple assault and simple battery.⁴⁵ Meanwhile, the other trooper asked JONES to exit the Black Ford.

89. While issuing JONES a written warning for speeding, one of the troopers asked JONES, "Do you care if I take a look through the vehicle?" In response, JONES stated, "Go ahead," along with an affirmative head and hand gesture. While searching the vehicle, an officer located a .38-caliber handgun in the dark-colored backpack recovered from the rear passenger compartment of the Black Ford. Also, recovered from inside the vehicle was the White Bag—two plastic shopping bags, one within the other—that contained approximately \$63,730 in cash (the "**May 2023 Funds**"). Further, a trooper located a black-colored TCL flip cellphone, which JONES claimed was not his.⁴⁶ Finally, a trooper located a Bank of America check that was signed and issued for \$20,000, with a blank payee, as depicted in the image below:

⁴⁵ Through the trooper's inquiry, it was determined that the warrant was dated on or about June 1, 2015, and not extraditable from the state of Indiana.

⁴⁶ Although JONES initially disclaimed ownership of the subject phone, when JONES later observed an assisting officer with the phone, he stated, "my other phone is in there too, sir."



*Bank of America Check with blank payee line
from "Trucking Safety Consultants Inc."⁴⁷*

90. Following the search of the Black Ford, JONES was placed in the front-passenger seat of a trooper's marked vehicle. A trooper informed JONES that he was not under arrest, and further advised JONES of his *Miranda* warnings. JONES stated that he understood his *Miranda* warnings, and a trooper began to ask JONES questions about the **May 2023 Funds** and JONES's travel.

91. More specifically, and as captured in a dash-camera recording, in response to questioning about why JONES had the **May 2023 Funds** with him at the time of the traffic stop, JONES stated, "It's a habit." When JONES was asked why he did not keep the **May 2023 Funds** in a bank, JONES responded, "I love keeping my money with me." Finally, when asked by the trooper, "You don't know exactly how many checks worth of cash that was," JONES responded, "Naw... but it's

Eventually, law enforcement located a second, black-colored smartphone, which JONES acknowledged was his. Law enforcement did not seize JONES's second phone.

⁴⁷ According to a May 8, 2023, query of ILSOS corporation records for "Trucking Safety Consultants Inc.," a Ronald Johnson Sr. at an address on the 3100 block of W. Roosevelt Road, in Chicago, Illinois is listed as the agent, president, and secretary of the corporation.

also been just cash period from me um chartering my boat.” JONES also advised the trooper that he was traveling to 1380 North Hamilton Road, in Gahanna, Ohio.

a. Based on my training, experience, and knowledge of this investigation, I believe when JONES responded, “I love keeping my money with me,” he was acknowledging his possession of the **May 2023 Funds** that were in the White Bag. Further, I believe that when JONES said he was traveling to 1380 North Hamilton Road in Gahanna, Ohio, he was not being truthful with the trooper, because that address in Gahanna, Ohio (which, according to Google, appears to be a northeast suburb of Columbus) is associated with a restaurant, not a residence.

92. After the trooper completed his field interview, the trooper explained to JONES that the **May 2023 Funds** would be seized for further investigation, and taken to Lake City Bank, located at 3601 Commerce Drive, Warsaw, Indiana, for counting. JONES was allowed to follow the troopers to the bank, where the funds were counted. While there, a trooper asked JONES about the blank check that was recovered from the car. In response, JONES stated that he did not know anything about the check, and further claimed that it did not belong to him. Following the counting of the **May 2023 Funds**, a trooper transported the funds to Indiana State Police Bremen Post located at 1425 Miami Trail, Bremen, Indiana for a K9 examination. JONES, meanwhile, was released at the scene without charges.

6. May 2, 2023, Indiana State Police Examination of the May 2023 Funds

93. Based on my training and experience, my conversations with other law enforcement officers, and my review of Indiana State Police reports, I know the following:

a. On or about May 2, 2023, at approximately 5:20 p.m., Master Trooper David Caswell placed the **May 2023 Funds** (along with the White Bag, in which they were contained) into a box and taped the box shut. Master Trooper Caswell then obtained two additional boxes of similar size and shape; and taped the two additional boxes shut. Master Trooper Caswell then placed the three boxes in the hallway of the ISP Bremen Post – approximately 10 feet apart.

b. Master Trooper Caswell has been an Indiana State Trooper for 19 years and is currently the canine handler of Indiana State Police K9 Chase, who is certified through the Dogs for Law Enforcement (DLE) standards, and is trained and certified in the detection of cocaine, crack cocaine, ecstasy, heroin, marijuana, and methamphetamine. K9 Chase's experience and usage in narcotics searches include vehicles, buildings, open areas, storage units, and parcels. K9 Chase has been trained to alert to the detection of narcotics as a passive alert at the source of narcotic odor. K9 Chase has been active and has maintained his certification since joining the Indiana State Police K9 program in April of 2016.

c. At approximately 5:45 p.m., Master Trooper Caswell had K9 Chase perform a sniff over the packages, previously placed in the hallway by Master Trooper Caswell. K9 Chase alerted on the package containing the **May 2023 Funds**,

“by sniffing intently on the package, stopping, sitting, locking up, and staring at the package.” Master Trooper Caswell continued to walk away from K9 Chase, and K9 Chase “stayed with the alert.”

d. On or about May 3, 2023, FBI agents accepted custody of the **May 2023 Funds** and the black-colored TCL flip cellphone from the Indiana State Police. On or about May 10, 2023, the FBI arranged to have the **May 2023 Funds** counted by Loomis (a money counting service) in Burr Ridge, Illinois; Loomis determined that the **May 2023 Funds** consisted of approximately \$63,730 in United States currency.

7. Pertinent Intercepted Communications Following Seizure of May 2023 Funds

94. On or about May 2, 2023, at approximately 2:31 p.m., Individual F,⁴⁸ who was using **Target Phone 6**, had a telephone conversation with JONES, who was using phone number 312-XXX-8719. During the conversation, JONES told Individual F, “Hey that work number don’t even answer it.” Individual F replied, “What?” JONES continued, “That number don’t answer it, I was doin’ a... I was doin’... a run and got popped so... okay?” Individual F replied, “Yeah.”

a. Based on my training, experience, and knowledge of this investigation, I believe in this call, JONES was advising Individual F that JONES

⁴⁸ Individual F has been identified a suspected member of the JOHNSON DTO. Individual F’s participation in the DTO is evidenced by the following: (1) surveillance observations of Individual F, entering and exiting the suspected drug-stash location at the East 42nd Place Premises, used and operated, at least in part, by JOHNSON; (2) wire interceptions, captured pursuant to the 11-16-22 and 4-11-23 Orders, concerning Individual F’s participation in the **Subject Offenses**; and (3) toll analysis confirming telephonic contact between phones believed to be used by Individual F, JOHNSON, and others identified in the DTO.

was stopped by law enforcement, and that the **May 2023 Funds** were seized. I believe when JONES, “Hey that work number don’t even answer it,” that JONES was advising Individual F not to answer any calls that came from the JONES’s second phone (believed to be the black-colored TCL flip cellphone), which had been seized by ISP during the traffic stop. Additionally, I believe that prior to law enforcement’s seizure of the TCL flip cellphone, it was used by JONES for the purpose of communicating within JOHNSON’s DTO. I also believe that when JONES stated, “I was doin’ a... I was doin’... a run and got popped,” that JONES was referring to himself being stopped by law enforcement while transporting drug-related currency (*i.e.*, “I was doing... a run”).

IV. CONCLUSION

95. For all the reasons described above, there is probable cause to believe that the following individuals committed the following **Subject Offenses**:

a. JOHNSON, BROWN ROBINSON, LAWRENCE, and JONES conspired to distribute, and to possess with intent to distribute, controlled substances, in violation of Title 21, United States Code, Sections 841(a) and 846, as alleged in Count One of this complaint;

b. BONAPARTE possessed with intent to distribute a quantity of cocaine and a quantity of marijuana, in violation of Title 21, United States Code, Section 841(a), as alleged in Count Two;

c. JOHNSON and BROWN ROBINSON traveled in interstate commerce to promote or facilitate unlawful activity, in violation of Title 18, United States Code, Sections 1952 and 2, as alleged in Count Three;

d. LAWRENCE possessed a firearm in furtherance of a drug-trafficking crime, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), as alleged in Count Four; and

e. JOHNSON and JONES traveled in interstate commerce to promote or facilitate unlawful activity, in violation of Title 18, United States Code, Section 1952 and 2, as alleged in Count Five.

FURTHER AFFIANT SAYETH NOT.

Michael Lee

MICHAEL D. LEE

Special Agent,

Federal Bureau of Investigation

SWORN TO AND AFFIRMED
by telephone July 25, 2023



Honorable YOUNG B. KIM

United States Magistrate Judge