

FILED**7/25/2023**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KEVIN WARE a/k/a "Twin" and "Hustle",
CHRISTOPHER WARE a/k/a "Guru",
BRANDAN ALLEN a/k/a "B-Ride",
RICKY WILLIAMS a/k/a "Buddy Love",
DARREL BROOKS a/k/a "D"
LEROY PRESLEY a/k/a "Bino", and
ERNEST ROWLETTE a/k/a "Boo"

CASE NUMBER: 23 CR 409

~~UNDER SEAL~~**CRIMINAL COMPLAINT**

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

From on or about February 9, 2022, to on or about November 3, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants violated:

*Code Section*Title 21, United States Code,
Sections 846 and 841(a)*Offense Description*

Did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and 100 grams or more of a mixture and substance containing a detectable amount of fentanyl analogue (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide) (p-Fluorofentanyl) a Schedule I Controlled Substance.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Masud Haidari

MASUD HAIDARI

Task Force Officer, Drug Enforcement
Administration (DEA)

by
YBK

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

Young B. Kim
Judge's signature

City and state: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, MASUD HAIDARI, being duly sworn, state as follows:

1. I am a Task Force Officer (“TFO”) with the Drug Enforcement Administration (“DEA”) and have been a TFO since approximately 2018. I am currently assigned to DEA’s Chicago Field Division, High Intensity Drug Trafficking Area (HIDTA). I have been a Chicago Police Officer for over 24 years and prior to my assignment as a DEA TFO, I was assigned to Chicago Police Department’s Narcotics Division. As part of my duties as a DEA TFO, I investigate criminal violations of Federal and State controlled substance laws. I have been personally involved in hundreds of narcotics investigations, and as such I am familiar with the various methods used by narcotics traffickers to transport, store, and distribute narcotics and narcotics proceeds. I have also received specialized training in the means and methods by which individual and drug trafficking organizations conduct their illegal drug trafficking activities and in the use of various investigative techniques used to uncover unlawful drug trafficking.

2. This affidavit is submitted in support of a criminal complaint alleging violations of controlled substances offenses, namely Title 21, United States Code, Sections 841 and 846, as outlined below. 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 the defendants committed the offenses alleged in the complaint.

3. This affidavit is based on my personal knowledge, my experience and training, information provided to me by other law enforcement agents, the experience and training of those agents, numerous discussions with confidential sources, review of consensual recordings, and physical surveillance.

FACTS IN SUPPORT OF PROBABLE CAUSE

I. OVERVIEW OF THE INVESTIGATION

A. The Drug Trafficking Organization and the Defendants' Roles

4. Since approximately October 2020, the United States, including the Drug Enforcement Agency ("DEA"), has been conducting a criminal investigation of a drug trafficking organization ("DTO") affiliated with the Chicago Gangster Disciples operating on the southeast side of Chicago, and in particular its involvement in narcotics distribution in violation of Title 21, United States Code, Section 841(a)(1) and 846. During the course of this investigation, law enforcement learned that members of the DTO utilized a telephone with telephone number 708-262-8118 ("Target Phone 1") to receive narcotics orders from customers, which members of the DTO subsequently serviced. Based upon information received from confidential sources, undercover officers, and Title III intercepts, among other investigative sources, law enforcement learned that multiple individuals used Target Phone 1 to field narcotics orders and that various members of the DTO took shifts

holding and receiving narcotics orders over Target Phone 1. During the conspiracy, the members of the conspiracy had different roles, which are summarized below:

a. KEVIN WARE, a/k/a “Twin” and “Hustle”, was the leader of the DTO. The users of Target Phone 1 reported to K WARE regarding their use of Target Phone 1, the DTO’s supply of narcotics, the DTO’s use of a stash house, the quality of narcotics that the DTO was selling, and the DTO’s interaction with law enforcement, among other narcotics-related topics.

b. CHRISTOPHER WARE, a/k/a “Guru”; BRANDAN ALLEN, a/k/a “B Ride”; RICKY WILLIAMS, a/k/a “Buddy Love”; DARRELL BROOKS, a/k/a “D”; and LEROY PRESLEY, a/k/a “Bino”, were narcotics distribution shift workers for the DTO and used Target Phone 1 as described above in paragraph 4 and subparagraph 4(a).

c. ERNEST ROWLETTE, a/k/a “Boo”, was initially a customer of the DTO and later became a narcotics distribution shift worker and user of Target Phone 1 and used Target Phone 1 as described above in paragraph 4 and subparagraph 4(a).

B. Summary of Evidence Obtained During the Investigation

5. Between in or around January 2021 and continuing until in or around November 2022, law enforcement conducted approximately 44 controlled purchases of narcotics from members of the DTO. Some of these transactions are described in this affidavit. Multiple undercover officers (“UCs”) and cooperating sources (“CSs”) were involved in the controlled purchases described in this affidavit.

6. The investigation also included court-authorized Title-III interceptions of wire and electronic communications over two cellular telephones—Target Phones 1 and 2—used by, among other people, the following individuals:¹

Target Phone	Phone Number	User(s)	Interception Period
Target Phone 1	708-262-8118	C. WARE a/k/a “Guru” B. ALLEN a/k/a “B Ride” R. WILLIAMS a/k/a “Buddy Love” D. BROOKS a/k/a “D” E. ROWLETTE a/k/a “Boo” L. PRESLEY a/k/a “Bino”	4/20/2022-5/19/2022 6/27/2022-7/26/2022 9/8/2022-10/6/2022
Target Phone 2	773-931-6000	KEVIN WARE a/k/a “Twin”	6/27/2022-7/26/2022 9/8/2022-10/6/2022

II. DTO MEMBERS USE TARGET PHONE 1 TO DISTRIBUTE NARCOTICS TO CUSTOMERS

7. Based on intercepted calls over Target Phone 1, and as further described below, I believe that from approximately February 2022 until November 2022, a time period which encompassed the First, Second, and Third Interception Periods,

¹ On April 20, 2022, Chief Judge Rebecca Pallmeyer entered an Order authorizing the initial interception of wire communications to and from Target Phone 1 for a period of 30 days (the “First Interception Period”). Law enforcement intercepted communications over Target Phone 1 from on or about April 20, 2022, through on or about May 19, 2022.

On June 27, 2022, Judge Pallmeyer entered an Order authorizing the renewed interception of wire communications to and from Target Phone 1 and the initial interception of wire and electronic communications to and from Target Phone 2 for a period of 30 days (the “Second Interception Period”). Law enforcement intercepted communications over Target Phone 1 from on or about June 27, 2022, through on or about July 26, 2022.

On September 7, 2022, Judge Pallmeyer entered an Order authorizing the second renewed interception of wire communications to and from Target Phone 1 and the first renewed interception of wire and electronic communications to and from Target Phone 2 for a period of 30 days (the “Third Interception Period”). Law enforcement intercepted communications over Target Phone 1 from on or about September 8, 2022, through on or about October 6, 2022.

members of the DTO (variously described herein as “shift workers”) used Target Phone 1 to arrange to sell narcotics to individual customers. Individuals interested in purchasing narcotics from the DTO would call Target Phone 1 and place an order for narcotics by speaking to the shift worker who was using Target Phone 1 at that time. The shift worker would then meet with the customer and distribute narcotics to the customer. As described below, law enforcement conducted controlled purchases of narcotics from DTO members LEROY PRESLEY, ERNEST ROWLETTE, CHRISTOPHER WARE, DARRELL BROOKS, BRANDAN ALLEN, and RICKY WILLIAMS, each of whom worked at various times for the DTO as a shift worker using Target Phone 1. Based on intercepted calls over Target Phone 1, I believe that these DTO members also used Target Phone 1 to take customer orders for narcotics on other occasions as well.

A. LEROY PRESLEY, a/k/a “Bino”

i. On or about February 23, 2022, LEROY PRESLEY Uses Target Phone 1 to Distribute Approximately 26.6 Grams of a Fentanyl and Heroin Mixture to CS3

8. On or about February 23, 2022, at approximately 9:05 a.m., a confidential law enforcement source (“CS3”)² sent a text message to Target Phone 1,

² CS3 has been cooperating with law enforcement since approximately December of 2019. CS3 has 11 prior arrests and no convictions. CS3 is cooperating with law enforcement for consideration on pending charges in New Orleans, LA, relating to distribution of heroin. No promises have been to CS3 regarding the resolution of that matter. Information provided by CS3 has been corroborated based on recorded communications, surveillance, and multiple narcotics seizures. Accordingly, law enforcement believes CS3 to be a reliable source of information.

stating, “Yoo this boo guy big man trying to slide on you with this 600 [I want to buy \$600 worth of narcotics].”³

9. At approximately 9:08 a.m., CS3 had a recorded phone conversation with Target Phone 1, which was being used by LEROY PRESLEY.⁴ During the call, CS3 said, “Shit, I got 600 [\$600], wh-what could you do for me [what narcotics can I buy with \$600]?” PRESLEY responded, “Shid, we gon work something out for you bro, shid. Ain’t no, nothin but jabs⁵ though [I can sell you narcotics but I only have small quantities].” CS3 asked, “You can get me in and outta there right [sell me the narcotics quickly so I can leave]?” PRESLEY responded, “Yeah. Just let me know before you on yo way. You got 600 you tryna spend you said?” CS3 said, “Ya-yeah.” PRESLEY replied, “Aight, just let me know before you on yo way out here so I can have my people have it together for you.”

³ Reference is made to recorded in-person communications, as well as recorded and intercepted telephone communications in this affidavit. The transcripts of the recorded and intercepted communications described in this affidavit remain in draft form; to the extent quotations from the communications are included, they are preliminary, not final. The summaries of recorded and intercepted communications in this affidavit do not include reference to all of the topics covered during the communications. In certain instances, I offer my interpretations of certain recorded and intercepted communications in brackets. My understanding of these communications is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussions with other law enforcement officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation.

⁴ Law enforcement has identified PRESLEY as the user of Target Phone 1 as follows: law enforcement compared the voice heard on Target Phone 1 during this call with PRESLEY’s voice captured on the covert audio/video recording captured by CS3 during the February 23, 2022 transaction described below. After the transaction, law enforcement confirmed PRESLEY’s identity via a traffic stop.

⁵ Based on my training and experience, I know that a “jab” refers to approximately 12-14 small bags of prepackaged narcotics.

10. At approximately 9:30 a.m., CS3 arrived at the predetermined meet location and law enforcement searched him/her for contraband or excess currency, with none found, and equipped CS3 with covert audio and video recording equipment. DEA provided CS3 with \$600 in pre-recorded law enforcement funds to use as buy money for the controlled transaction with PRESLEY.

11. At approximately 10:34 a.m., CS3 had a recorded phone conversation with PRESLEY, who was using Target Phone 1. During the conversation, CS3 asked PRESLEY where they should meet. PRESLEY responded, “Meet at 111th, 111th and Halsted.” CS3 said, “I’m coming for them six jabs [narcotics].” PRESLEY said, “Aight.”

12. With the assistance of a court-authorized search warrant,⁶ law enforcement had previously identified the location of Target Phone 1 as being inside a silver 2012 Volkswagen (the “Silver Volkswagen”)⁷ in the 11300 block of South Green Street, in Chicago. According to law enforcement surveillance, at approximately 10:43 a.m., PRESLEY and a female entered the Silver Volkswagen and departed the area. Surveillance teams followed.

13. At approximately 10:43 a.m., CS3 had a recorded phone conversation with PRESLEY, who was using Target Phone 1. During the call, PRESLEY told CS3 to meet at the Currency Exchange located at W. 111th Street and S. Halsted Street.

⁶ See 22 M 47 (Fuentes, M.J.), January 20, 2022.

⁷ According to vehicle registration records from the Illinois Secretary of State, the Silver Volkswagen was registered to PRESLEY.

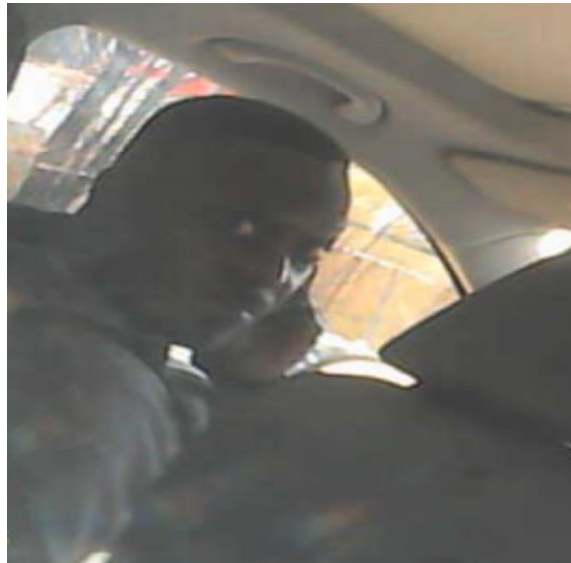
14. At approximately 10:46 a.m., CS3 pulled into the Currency Exchange at approximately 11057 S. Halsted. At approximately 10:47 a.m., CS3 had a recorded phone conversation with PRESLEY, who was using Target Phone 1. CS3 told PRESLEY s/he had arrived. PRESLEY said that he was two minutes away.

15. According to CS3, law enforcement surveillance, and audio/video recordings of the transaction, at approximately 10:49 a.m., CS3 exited his/her car and entered the rear passenger side of the Silver Volkswagen. PRESLEY was inside the Silver Volkswagen along with the unidentified female. Inside the Volkswagen , the female passenger counted several small clear zip lock bags containing a white powdery substance which she handed to PRESLEY, who then gave them to CS3. In return, CS3 hand \$600 in pre-recorded law enforcement funds to PRESLEY. CS3 then exited the Silver Volkswagen and departed the area. CS3 reunited with law enforcement who took custody of the small clear zip lock bags. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of fentanyl and heroin and weighed approximately 26.6 grams.

16. Law enforcement continued surveillance on the Silver Volkswagen as it departed the area. At approximately 11:24 a.m., law enforcement performed an investigative stop on the Volkswagen. The driver of the Volkswagen identified himself as PRESLEY and presented his identification to law enforcement.

17. Law enforcement later showed a driver's license photo of PRESLEY to CS3 and CS3 confirmed that PRESLEY was the individual in the Silver Volkswagen

who sold narcotics to CS3. A still image of PRESLEY from CS3's covert video recording device appears below:



18. As captured on CS3's recording devices, CS3 and PRESLEY discussed the price that CS3 typically paid for heroin. Specifically, PRESLEY told CS3, "I work for Twin [KEVIN WARE]"⁸ and explained that he could "get the grams [of narcotics]." PRESLEY also told CS3 that he goes by the name "Bino" and would send CS3 his number so they could communicate directly for future narcotics deals. PRESLEY confirmed that the deal was \$600 for "80 bags." CS3 gave PRESLEY the money and told him to count it and PRESLEY did so. The narcotics are not visible on the video, but the recording is consistent with CS3's recollection of the events that transpired in the car.

⁸ As detailed below, law enforcement first learned of K WARE's nickname "Twin" from CS1 in February 2021 during the early stages of this investigation. Moreover, multiple intercepted communications over Target Phones 1 and 2 confirmed that K WARE goes by the nicknames "Twin" and "Hustle."

ii. On or about April 27, 2022, PRESLEY Uses Target Phone 1 to Distribute Approximately 7.1 Grams of a Fentanyl Analogue, Fentanyl, and Heroin Mixture to CS4

19. On or about April 27, 2022, at approximately 10:25 a.m., two confidential law enforcement sources (“CS1” and “CS4”)⁹ arrived at the predetermined meet location and law enforcement searched them for contraband or excess currency, with none found. Law enforcement equipped the CSs with covert audio and video recording devices and provided CS4 with \$200 in pre-recorded law enforcement funds to use for the anticipated controlled narcotics transaction with PRESLEY.

20. At approximately 10:40 a.m., law enforcement learned from intercepted communications over Target Phone 1 that PRESLEY, who was using Target Phone 1, was en route to W. 115th Street and S. Parnell Avenue, in Chicago. At

⁹ As of April 2022, CS1 had been cooperating with law enforcement since in or around April 2010. CS1 has three felony drug convictions. CS1 was cooperating with law enforcement for financial compensation. As of April 2022, CS1 had received reimbursements in the amount of approximately \$25,765 from law enforcement for expenses associated with his/her cooperation in this and other investigations. CS1 has provided timely and accurate information that has been corroborated by law enforcement through controlled buys, consensual recordings, phone records, and law enforcement reporting. On or about May 11, 2022, CS1 participated at law enforcement’s direction in a controlled transaction. Following the May 11, 2022 transaction, law enforcement learned of facts suggesting that CS1 may not have provided law enforcement with the full quantity of narcotics that CS1 obtained during the May 11, 2022 transaction. As a result, law enforcement ceased to utilize CS1 in situations in which CS1 would be asked to handle narcotics. Law enforcement still believes that the information that CS1 has provided during the course of this investigation has been reliable.

CS4 has been cooperating with law enforcement since approximately October 2021. To date, DEA has paid CS4 approximately \$7,000.00 for his/her assistance in various investigations. CS4 is a convicted felon and has 15 total prior arrests and 3 convictions. CS4’s prior convictions include for homicide, robbery, and weapons offenses. Information provided by CS4 has proven reliable and has been corroborated by CPD records, controlled buys, and other witness and law enforcement reporting.

approximately 10:45 a.m., law enforcement saw PRESLEY driving a black Honda Civic (the “Black Civic”) at W. 115th Street and Michigan Avenue. Surveillance units followed the Black Civic as it stopped on several occasions and PRESLEY, who was the driver, appeared to conduct suspected hand to hand narcotics transactions with unknown individuals.

21. At approximately 10:58 a.m., CS1 called Target Phone 1 and PRESLEY answered. During the recorded phone conversation, PRESLEY told CS1 to “come down 115th make a left on Wallace and pull over.” CS1 agreed.

22. According to law enforcement surveillance, at approximately 11:05 a.m., CS1 arrived and parked on the 11300 block of S. Wallace Street, in Chicago. At approximately 11:08 a.m., PRESLEY arrived and parked near CS1’s car. Moments later, CS1 had a recorded phone conversation with PRESLEY, who was using Target Phone 1. During the conversation, CS1 asked PRESLEY for a “dub” [\$200 worth of narcotics]. CS4 then got out of CS1’s car, walked around the Black Civic, and entered the passenger seat of the Civic. At approximately 11:10 a.m., CS4 exited PRESLEY’s Civic, reentered CS1’s vehicle, and departed the area with CS1. Surveillance followed PRESLEY as he departed the area and drove to a restaurant, before walking down the street.

23. CS1 and CS4 subsequently reunited with law enforcement, who took custody of approximately 20 clear and blue plastic zip lock baggies. According to the DEA Laboratory, the contents of the baggies tested positive for presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed

approximately 7.1 grams. A still image of PRESLEY in the Black Civic from CS4's covert video recording device appears below:



24. According to CS4, when s/he got into PRESLEY's car, CS4 told PRESLEY that s/he wanted 20 bags. PRESLEY then counted out 20 bags containing a white powdery substance and gave them to CS4. In return, CS4 gave to PRESLEY the \$200 of pre-recorded law enforcement funds.

25. Law enforcement later showed a driver's license photo of PRESLEY to CS1 and CS4 and both CS1 and CS4 positively identified PRESLEY as the individual who sold narcotics to CS4.

iii. PRESLEY Uses Target Phone 1 to Coordinate Additional Narcotics Transactions

26. As discussed below and elsewhere in this affidavit, PRESLEY used Target Phone 1 to arrange similar narcotics transactions on other occasions. For example:

a. On or about April 23, 2022, at approximately 7:04 p.m. (TP1, Session 3211), an unknown customer who identified himself as “Tony” called PRESLEY, who was using Target Phone 1. The individual said “Hey this Tony [U/I]. Can I get a couple of dime hard [crack cocaine]?” PRESLEY replied, “Where you at? Alright. Ok.” Tony replied, “How long you gonna be?” PRESLEY responded, “I’ll call you when I’m pulling up there.”

b. On or about May 2, 2022, at approximately 10:06 a.m. (TP1, Session 12812), PRESLEY, who was using Target Phone 1, had a conversation with an unidentified female in which the female asked for narcotics. Specifically, PRESLEY said, “Where you at on 125th and Ashland?” The UF replied, “11650 W. 125th Street. On the other side of the fire department.” PRESLEY said, “I know where you at. Come on outside. What you tryina do [what kind of narcotics do you want]?” The unidentified female replied, “1 and 1.” PRESLEY responded, “I ain’t got no hard [crack cocaine] right now, but I got [U/I].” The UF said, “Okay, just one.” PRESLEY replied, “Alright. I’m finna be pullin’ up.”

c. On or about May 3, 2022, at approximately 1:22 p.m. (TP1, Session 13802), PRESLEY, who was using Target Phone 1, had a conversation with an unknown male who had previously identified himself as “Marcus.” During the call, PRESLEY said, “What you tryina do [what kind of narcotics do you want]?” “Marcus” said, “2. You got any hard [crack cocaine]?” PRESLEY responded, “No, I told you that.” “Marcus” replied, “Okay, just two soft [two units of heroin or powder cocaine].” PRESLEY said, “Alright. Be on the porch. I’ll call you when I’m pullin’ up.”

d. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above calls from May of 2022, PRESLEY was working as a shift worker for the DTO and using Target Phone 1 to take customer orders for narcotics and agreed to meet the customers to conduct the narcotics transactions.

B. ERNEST ROWLETTE a/k/a “Boo”

i. On or About May 2, 2022, ROWLETTE Purchases Approximately 0.357 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture from PRESLEY, who Uses Target Phone 1 to Coordinate the Transaction

27. On or about May 2, 2022, at approximately 12:11 p.m. (TP1, Session 12902), ROWLETTE, who was using phone number 708-***-2437 (“ROWLETTE Phone 1”),¹⁰ had a conversation with PRESLEY who was using Target Phone 1. During the call, ROWLETTE asked PRESLEY, “Yeah you said 108th, right?” PRESLEY responded, “Yeah.” ROWLETTE said, “Oh, okay. Yeah, I’m over there now.” PRESLEY asked, “You on 108th and Emerald?” and ROWLETTE stated, “Yeah, yeah, I’m standing out here.” PRESLEY asked, “All right what you trying to do?” ROWLETTE responded, “I just need one [one bag of heroin].” PRESLEY said,

¹⁰ ROWLETTE has been identified as the user of ROWLETTE Phone 1 as follows: as described below, on or about May 2, 2022, law enforcement observed ROWLETTE purchase narcotics from PRESLEY. After the transaction, law enforcement conducted a street stop of ROWLETTE was driving and confirmed his identity via the driver’s license that ROWLETTE presented to law enforcement. During the traffic stop, ROWLETTE told law enforcement that he was the user of ROWLETTE Phone 1. Additionally, ROWLETTE’s voice was recorded during the stop and, based on a voice comparison, law enforcement confirmed that ROWLETTE was the user of ROWLETTE Phone 1.

“Oh, okay, I’m finna pull up on you bro.” ROWLETTE replied, “Ok.” PRESLEY then asked, “Where you at? On the corner?” ROWLETTE responded, “A little bit before the corner of 108th.” PRESLEY said: “All right, here I go right here, bro. So right here.” ROWLETTE stated, “Okay, hey you following me, I gotta meet.” PRESLEY stated, “Oh, man, bro. Come on, man. Don’t call me with no short money no more. I’m running.” ROWLETTE said, “All right I got you.”

28. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, I believe that ROWLETTE called Target Phone 1 to purchase narcotics and that PRESLEY, the user of Target Phone, told ROWLETTE that he expected that ROWLETTE would have the full amount of money for the bag of heroin. After this phone call, law enforcement saw ROWLETTE appear to purchase narcotics from PRESLEY and, at approximately 12:16 pm, law enforcement detained ROWLETTE after a traffic stop and recovered a plastic baggie containing suspected narcotics. According to the DEA Laboratory, the contents of the baggie tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl and weighed approximately 0.357 grams.

ii. ROWLETTE Uses Target Phone 1 to Distribute Approximately 2.85 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC1 on August 24, 2022

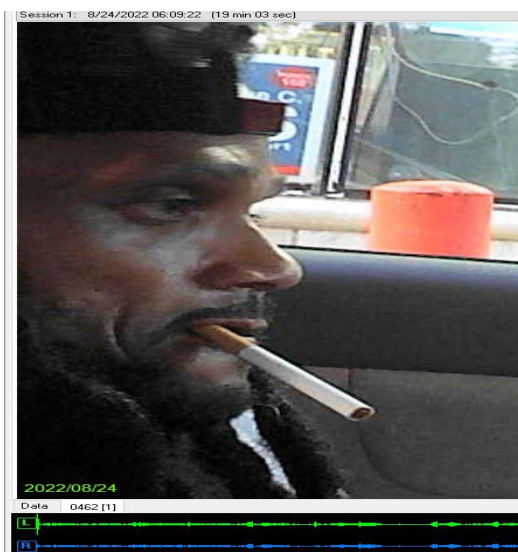
29. Based on my knowledge of the investigation, I know that at some point after ROWLETTE purchased narcotics from PRESLEY in May of 2022, ROWLETTE became a shift worker for the DTO and used Target Phone 1 to distribute narcotics.

30. For example, on or about August 24, 2022, law enforcement arranged a controlled transaction whereby UC1 purchased narcotics from the user of Target Phone 1, who at that time was ROWLETTE.

31. More specifically, on or about August 24, 2022, at approximately 6:07 a.m., UC1 had a recorded phone conversation with ROWLETTE, who was using Target Phone 1.¹¹ During the call, ROWLETTE and UC1 agreed to meet at the Citgo gas station located at the intersection of E. 116th Street and S. Michigan Avenue, in Chicago, so that ROWLETTE could distribute narcotics to UC1. UC1 then departed to meet with ROWLETTE. Prior to the transaction, law enforcement equipped UC1 with covert audio and video recording equipment.

¹¹ ROWLETTE has been identified as the user of Target Phone 1 in this call and other calls described in this affidavit as follows: as described below, law enforcement showed a known photograph of ROWLETTE to UC1 after UC1 met with and purchased narcotics from ROWLETTE on August 24, 2022, and UC1 confirmed that the individual was ROWLETTE. Additionally, as discussed above, on May 2, 2022, law enforcement watched ROWLETTE purchase a bag of narcotics from PRESLEY. After the transaction, law enforcement conducted a traffic stop on the car ROWLETTE was driving and confirmed his identity via his driver's license. During the stop, ROWLETTE admitted to law enforcement that he was the user of the telephone (ROWLETTE Phone 1) that was intercepted communicating with Target Phone 1 immediately before ROWLETTE purchased narcotics from PRESLEY. Finally, law enforcement recorded ROWLETTE's voice during the May 2, 2022 traffic stop and confirmed that ROWLETTE was the user of Target Phone 1, based on a voice comparison.

32. According to UC1, law enforcement surveillance, and audio and video recordings of the interaction, at approximately 6:23 a.m., ROWLETTE arrived at the meet location driving a tan 2007 Hyundai Sonata with Illinois registration ZU48369 (the “Tan Hyundai”). UC1 approached the Hyundai and entered the front passenger seat. Once inside the Hyundai, ROWLETTE distributed eight baggies of narcotics to UC1 and in exchange UC1 gave ROWLETTE \$60 of pre-recorded law enforcement funds. While UC1 was seated in the front passenger seat next to ROWLETTE, UC1 noticed that ROWLETTE was receiving calls on his cell phone from “Buddy Love”, which, as described further below, law enforcement learned to be the nickname for RICKY WILLIAMS. Still images of ROWLETTE from UC1’s covert video recording device appear below:



33. After the controlled transaction, UC1 reunited with law enforcement who took custody of the eight baggies. According to the DEA laboratory, the contents in the eight baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 2.85 grams.

iii. ROWLETTE Uses Target Phone 1 to Coordinate Additional Narcotics Transactions

34. As discussed below and elsewhere in this affidavit, ROWLETTE used Target Phone 1 to arrange similar narcotics transactions on other occasions. For example:

a. On or about July 14, 2022, at approximately 11:33 p.m. (TP1, Session 57017), ROWLETTE, who was using Target Phone 1, had a conversation with an unknown individual who was using phone number 773-***-2227. During that call, ROWLETTE asked, “What’s up sick one.” The individual responded, “What’s going on. You got both [heroin and crack cocaine]?” ROWLETTE stated, “Yup.” The individual stated, “Come see me. 12537 S Lowe [PH].” ROWLETTE responded: “Okay.”

b. Approximately 16 minutes later, at approximately 11:49 p.m. (TP1, Session 57036), ROWLETTE, who was using Target Phone 1, had a recorded conversation with another unknown individual who was using phone number 872-***-0794. During that call, the individual stated, “I was saying . . . I was trying to make sure you had both, um . . . by the time you come [the narcotics customer was making sure that ROWLETTE had both heroin and crack cocaine] Yeah. Did you hear me, Boo?” ROWLETTE responded, “Yeah, I heard.” The individual stated, “Okay. I was just making sure, so you didn’t run out before you get to me [customer was making sure that ROWLETTE did not run out of narcotics before meeting with the unknown individual].”

c. On or about July 23, 2022, at approximately 11:33 p.m. (TP1, Session 66811), ROWLETTE, who was using Target Phone 1, had a conversation with an unknown female who had previously identified herself as “Jean.” ROWLETTE said to “Jean,” “I’ll be that way in a few.” Jean said, “You see me, there is a whole lot of us on 16 boy.” ROWLETTE replied, “Huh?” Jean said: “Shit is about five, six of us here who wants some shit [narcotics].” ROWLETTE said, “A’ight well I’ll be that way in a few, right there.” Jean replied, “You got both of them [heroin and crack cocaine]?” ROWLETTE said, “Yup.” Jean said, “That’s what’s up man, come on baby.”

d. Based on my training and experience and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above calls from July of 2022, ROWLETTE was working as a shift worker for the DTO, using Target Phone 1 to take customer orders, and confirmed with narcotics customers that he had two types of narcotics to sell to them.

C. CHRISTOPHER WARE, a/k/a “GURU”

i. On or About August 25, 2022, CHRISTOPHER WARE Uses Target Phone 1 to Distribute Approximately 12.2 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC2

35. On or about August 25, 2022, law enforcement arranged a controlled narcotics transaction between UC2 and CHRISTOPHER WARE, who was using Target Phone 1. More specifically, on or about August 25, 2022, at approximately

10:58 a.m., UC2 made a recorded phone call to C WARE, who was using Target Phone 1, which appears below.¹²

C WARE: Hello?

UC2: Hey, this is [UC2], I pulled up on 118th Street, can I get with you [purchase narcotics]?

C WARE: 118th and what?

UC2: Huh, 118th and Michigan.

C WARE: Who is this?

UC2: [UC2], this [UC1's] friend.

C WARE: Are you on 118th or what?

UC2: And Michigan, over here by this beauty supply store on 118th.

C WARE: Aight, I finna pull up there.

UC2: Thank you.

36. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation C WARE and UC2 agreed to meet at a beauty supply shop located at the intersection of W. 118th Street and S. Michigan Avenue, in Chicago, so that C WARE could distribute narcotics to UC2.

¹² CHRISTOPHER WARE has been identified as the user of Target Phone 1 during this call and any other calls in which he is identified in this Affidavit as follows: as discussed below, after the August 25, 2022 controlled transaction, law enforcement showed a known photograph of C WARE to UC2, who confirmed that the person in the photo was the same individual that UC2 had purchased narcotics from and the same individual that UC2 had communicated with over Target Phone 1.

Additionally, on August 17, 2022 and August 25, 2022, UCs made audio and video recorded controlled purchases of narcotics from C WARE. After the controlled purchases, the UCs positively identified C WARE based on a booking photograph of C WARE obtained from a law enforcement database. On or about August 30, 2022, law enforcement investigators reviewed the audio and video recordings of the August 17, 2022 and August 25, 2022 controlled purchases and compared C WARE's voice to the voice of a previously unidentified male who went by the nickname "Guru" on intercepted calls (TP1 Sessions 60069 and 60647; and TP2 Sessions 1095 and 1220). Investigators confirmed that WARE's voice recorded during the August 17, 2022 and August 25, 2022 controlled matched the voices heard on the intercepted on calls with "Guru."

37. UC2 then departed to meet with C WARE. Prior to the transaction, law enforcement equipped UC2 with covert audio and video recording equipment.

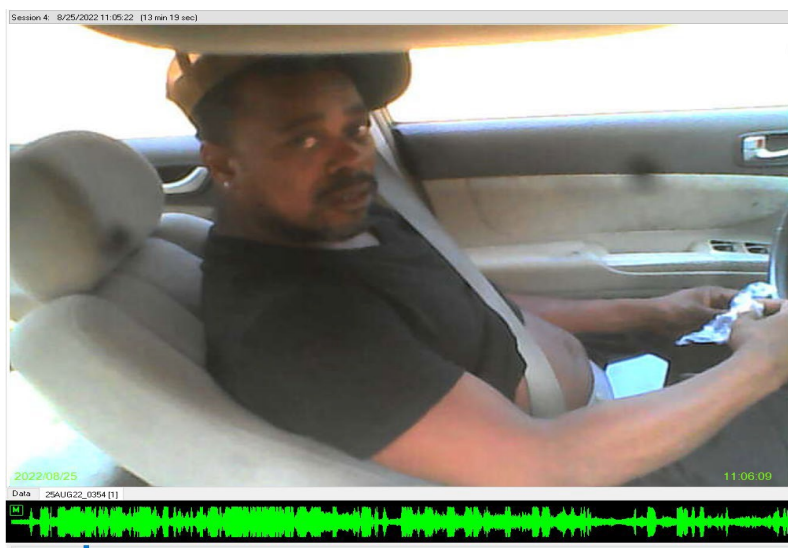
38. According to UC2, law enforcement surveillance, and audio and video recordings of the interaction, at approximately 11:06 a.m., C WARE arrived at the meet location driving the Tan Hyundai, which was the same vehicle, as described above, that ROWLETTE drove to a controlled transaction with UC1 the previous day on August 24, 2022.¹³ UC2 approached the Tan Hyundai, entered the front passenger seat, and asked WARE for “the soft [heroin]”. C WARE then told UC2 to meet him at the corner of W. 123rd, between S. Emerald Avenue and S. Halsted Street. UC2 then exited the Hyundai, reentered his/her car, and UC2 and C WARE each drove to the intersection of 123rd and Halsted where UC2 parked behind C WARE in the Tan Hyundai. UC2 exited his/her vehicle and approached C WARE through the passenger door of the Hyundai, and C WARE stated, “Meet me at the other block, come on ... my brother, he got it.”

39. UC2 then drove away. As UC2 was driving, UC2 placed another recorded call to C WARE, who was using Target Phone 1. During the recorded conversation, UC2 told C WARE that UC2 was having car trouble and asked if WARE

¹³ BRANDAN ALLEN also used the Tan Hyundai to distribute narcotics on or about September 10, 2022, roughly two and a half weeks after the above transactions involving ROWLETTE and C WARE. Specifically, during the September 10, 2022 controlled transaction, ALLEN sold 14 individually-wrapped plastic baggies with Superman logos to UC2 in exchange for \$105 in an audio and video recorded controlled transaction. During the transaction, BRANDAN ALLEN arrived at the deal driving the Tan Hyundai. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of fentanyl and weighed approximately 5 grams.

could meet him/her on the street. C WARE responded, “Yeah I’m gonna meet you right there baby, I’m gonna meet you right back there ... I got you.”

40. At approximately 11:27 a.m., C WARE parked next to UC2’s car which was located on Halsted Street approximately halfway between W. 122nd and W. 123rd streets. UC2 entered the passenger seat of the Tan Hyundai and C WARE distributed a baggie of narcotics to UC2 and in exchange UC2 gave C WARE \$230 of pre-recorded law enforcement funds. According to UC2, during the transaction, UC2 saw and heard C WARE answer Target Phone 1, which UC2 believed to be a narcotics customer. According to UC2 and the audio recording, C WARE told the unknown caller that C WARE would go to them, and that the caller needed to stop calling because he needed to “re-load” [restock narcotics to sell]. A still image of C WARE from UC2’s covert video recording device appears below:



41. UC2 then departed and reunited with law enforcement, who took custody of the baggie. According to the DEA laboratory, the contents of the baggie

tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 12.2 grams.

ii. On or About September 14, 2022, CHRISTOPHER WARE Uses Target Phone 1 to Distribute Approximately 6.34 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC1

42. On or about September 14, 2022, law enforcement arranged a controlled transaction narcotics between UC1 and C WARE, who was using Target Phone 1. Specifically, on September 14, 2022, at approximately 11:28 a.m. (TP1, Session 77345), UC1 made a recorded phone call to C WARE, who was using Target Phone 1. During the call, C WARE and UC1 agreed to meet at the Family Dollar Store located at the intersection of W. 118th Street and S. Michigan Avenue, in Chicago, so that C WARE could sell narcotics to UC1. More specifically, during their conversation, UC1 said: “[t]his is [UC1] baby I’m over on 115th...I’m on 115th at Family Dollar I’m [UC1] boo...who is this? C WARE replied, nah this ain’t boo...whats up? ...what up, what up, what up?” UC1 responded, “I’m at Family Dollar . . . y’all going to link with me I’m at Family Dollar . . . gonna walk up there at Family Dollar baby . . . 115th.” C WARE said, “I’ll call you when I get there with it [narcotics].” UC1 then departed for the meet location. Prior to departing for the meet location, law enforcement equipped UC1 with audio and video recording devices.

43. At approximately 11:47 a.m. and 11:50 a.m., UC1 and C WARE had two additional recorded conversations over Target Phone 1 in which C WARE told UC1 that he was arriving at the meet location. According to UC1, law enforcement surveillance, and audio and video recordings of the interaction, at approximately

11:51 a.m., C WARE arrived at the meet location driving a black Hyundai Santa Fe with Illinois license plate number D691655 (the “Black Hyundai”). UC1 approached the passenger window of the Black Hyundai and C WARE distributed 16 clear plastic baggies of narcotics to UC1 and in return UC1 gave C WARE \$120 of pre-recorded law enforcement funds. Each baggie of narcotics had a Superman logo on it. A still image of C WARE from UC1’s video recording device appears below:



44. After the transaction, UC1 reunited with law enforcement, who took custody of the 16 clear plastic baggies. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 6.34 grams.

- iii. **On or About September 20, 2022, CHRISTOPHER WARE Uses Target Phone 1 to Distribute Approximately 20.8 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC2 and CS3**

45. On or about September 20, 2022, law enforcement arranged a controlled narcotics transaction between UC2, CS3, and C WARE, who was using Target Phone 1. More specifically, on or about September 20, 2022, at approximately 11:01 a.m. (TP1, Session 84457), UC2 made a recorded call to C WARE, who was using Target Phone 1, which appears below:

UC2: Hey this [UC2].

C WARE: What up?

UC2: I'm tryin', yeah I got about 400 [dollars] I'm trying to spend [on narcotics], I'ma be around 118th and Michigan. Could you take care of me?

C WARE: Yeah.

UC2: Ok how long you gonna be?

C WARE: I was gonna pull up on you right now.

UC2: Okay me and my boy, cause I got his money too. So we, we will be there.

46. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation C WARE and UC2 agreed to meet at the intersection of E. 118th Street and S. Michigan Avenue so that UC2 could purchase \$400 worth of narcotics from C WARE.

47. UC2 and CS3 then departed for the meet location. Prior to the transaction, law enforcement equipped UC2 and CS3 with covert audio and video recording devices and checked CS3 for contraband and excess currency, with none found.

48. According to UC2, CS3, law enforcement surveillance, and audio and video recordings of the transaction, at approximately 11:03 a.m., C WARE arrived at the meet location driving the Black Hyundai. UC2 and CS3 entered the back seat of the Black Hyundai and C WARE distributed two clear plastic bags—one containing 30 individually wrapped plastic baggies with Superman logos on them, and the other containing 26 individually wrapped baggies—to UC2 and CS3. In return, UC2 provided \$420 of pre-recorded law enforcement funds to C WARE. A still image of C WARE from UC2’s video recording device appears below:



49. After the transaction, UC2 and CS3 reunited with law enforcement, who took custody of the baggies. According to the DEA laboratory, the contents of the baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 20.8 grams.

- iv. **On or About September 21, 2022, CHRISTOPHER WARE Uses Target Phone 1 to Distribute Approximately 48 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC2 and CS3**

50. On or about September 21, 2022, law enforcement arranged a controlled narcotics transaction between UC2, CS3 and C WARE, who was using Target Phone 1. More specifically, on September 21, 2022, at approximately 10:11 a.m. (TP1 Session 85556), UC2 had a recorded conversation with C WARE, who was using Target Phone 1, which appears below:

UC2: Hey! This Twan or Cuzzo?
C WARE: What's up? This Twan.
UC2: This [UC2]. I'm trying to get what you gave me yesterday, the 28 for 210 [28 individual units of narcotics for \$210].
C WARE: Yeah.
UC2: But, my boy [CS3], he was tryin' to see if he could get maybe 5 grams [of narcotics].
C WARE: I told him dude ain't got back up with me on the grams yet. I told you all that [explaining that he can't sell narcotics to CS3].
UC2: So you can't get it today? Or what day can you get it?
C WARE: When he get back with me I'll let them know.
UC2: Okay, so we gonna see you today.
C WARE: Aight. I'm out here right now.
UC2: Okay. Let me get, let me get...I'll probably order a little bit more [narcotics]. We find out, if not, he gonna have to order a little bit more. Cause he trying to get ready for the weekend, but me just uh ... We'll call you back. Okay?
C WARE: Aight, got you.

51. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation, C WARE and UC2 discussed C WARE selling narcotics to both UC2 and CS3. C WARE explained to UC2 that C WARE had already told CS3 that C WARE couldn't fulfill CS3's narcotics order just yet, and that CS3 had to wait. C WARE then took a narcotics order from UC2.

52. Approximately two minutes later, at approximately 10:13 a.m., UC2 called C WARE back on Target Phone 1 (TP1, Session 85561), and said, “Hey, [U/I]. I forgot, did I tell you how many grams [of narcotics] he wanted?” C WARE responded, “Yeah, but I just told you. You steady saying grams [you continue to say ‘grams’]...I can’t get it ... you shouldn’t be calling back talking about no grams. You ain’t got back up with me. I can’t get the grams, baby. I told you [he can’t sell narcotics to CS3].”

53. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation, C WARE was scolding UC2 for using the word “grams” on the telephone, in case they were being overheard or recorded.

54. UC2 and CS3 prepared to depart for the meet location. Prior to the transaction, law enforcement equipped UC2 and CS3 with covert audio and video recording devices and gave UC2 and CS3 \$1,000 in pre-recorded law enforcement funds to use for the controlled transaction, and checked CS3 for contraband or excess currency, with none found.

55. According to UC2 and CS3, law enforcement surveillance, and audio and video recordings of the encounter, at approximately 11:13 a.m., UC2 and CS3 arrived at the intersection of 119th Street and State Street, in Chicago. UC2 called C WARE on Target Phone 1 (TP1, Session 85633), and said, “Hey Twan, this [UC2], I’m over like 119th and Michigan, I need 7 [units of narcotics] of those [U/I] I got like 700 dollars or something.” C WARE responded, “You got what?” UC2 said, “700.” C WARE

said, “Oh ... man you don’t get seven on those for no seven hundred baby ... baby 28 is 210. What makes you think you gonna get 7—28 for 700? Huh? ... it’s 195 for each bundle. It’s 26 in a bundle baby ... now you add it up, you got 700.”

56. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation, C WARE was explaining how much narcotics UC2 could purchase for \$700.

57. At approximately 12:25 p.m., and again at approximately 12:47 p.m., UC2 called C WARE on Target Phone 1 (TP1, Sessions 85675, 85720) and WARE confirmed that he was on his way. At approximately 12:53 p.m., C WARE arrived near the intersection of E. 119th Street and S. Michigan avenue driving the Black Hyundai, in front of the same beauty supply shop where C WARE distributed narcotics to UC2 on August 25, 2022. UC2 and CS3 then entered Black Hyundai. Once inside, C WARE gave UC2 a plastic bag that contained 128 small clear blue baggies with Superman logos containing a white powdery substance and in return UC2 gave \$1,000 in pre-recorded law enforcement funds to C WARE, which according to UC2 and CS3, C WARE didn’t count. UC2 explained to C WARE that UC2 had included an extra \$25 for C WARE so that C WARE would “take care” of UC2 the next time [sell UC2 more narcotics]. Still images of C WARE from UC2’s covert video recording device appear below:



58. After the transaction, UC2 and CS3 reunited with law enforcement, who took custody of the 128 small clear blue baggies with Superman logos. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of heroin, fentanyl, and fentanyl analogue, and weighed approximately 48 grams. A photograph of the small baggies with Superman logos on them is below:



- v. **On or About September 28, 2022, CHRISTOPHER WARE Uses Target Phone 1 to Distribute Approximately 46**

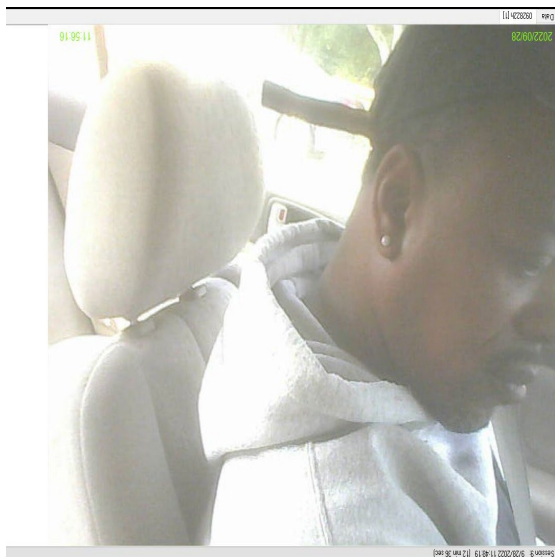
Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to CS3

59. On or about September 28, 2022, law enforcement arranged a controlled narcotics transaction between CS3 and C WARE, who was using Target Phone 1. Specifically, on or about September 28, 2022, at approximately 10:12 a.m. (TP1 Session 94031), CS3 made a recorded phone call to C WARE, who was using Target Phone 1, asked to purchase narcotics and told C WARE that CS3 would be at the intersection of E. 119th Street and S. Michigan Avenue in about 30 minutes. C WARE told CS3 to call him when he arrived.

60. Prior to the transaction, law enforcement equipped CS3 with covert audio and video recording devices and checked CS3 for narcotics and excess currency, with none found. Law enforcement also provided \$1,000 to CS3 in pre-recorded law enforcement funds for use during the controlled transaction.

61. At approximately 11:36 a.m. and 11:48 a.m., CS3 called to C WARE on Target Phone 1 and C WARE confirmed he was on his way to meet CS3. According to CS3, law enforcement surveillance, and audio and video recordings of the transaction, at approximately 11:56 a.m., C WARE arrived at the beauty supply store driving the Tan Hyundai. CS3 exited his/her car and got into the Tan Hyundai. C WARE then distributed to CS3 a plastic bag that contained multiple smaller clear baggies with Superman logos, each of which contained a white powdery substance. In return, CS3 provided the \$1,000 in pre-recorded law enforcement funds to C WARE. CS3 asked C WARE whether C WARE could sell CS3 “straight grams,” meaning grams of uncut

narcotics. C WARE said that he would have to “get back to” CS3. Still images of C WARE from CS3’s covert video recording device appear below:



62. CS3 then departed and reunited with law enforcement, who took custody of the plastic bag and the multiple smaller clear baggies with Superman logos. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 46 grams.

vi. CHRISTOPHER WARE Uses Target Phone 1 to Coordinate Additional Narcotics Transactions

63. As discussed below in this affidavit, C WARE used Target Phone 1 to arrange similar narcotics transactions to customers on other occasions. For example:

a. On or about July 6, 2022, at approximately 2:15 p.m. (TP1, Session 46834), C WARE, who was using Target Phone 1, had a recorded phone conversation with Individual A, who was using telephone number 773-***-0118. During the call, Individual A asked C WARE, “Yea bro, what car you in?” C WARE,

who was engaged in an audible side conversation, asked, “Where you at?” Individual A responded, “I’m right here in the Taurus.” C WARE asked, “In the red [U/I] gas station?” Individual A replied, “Yeah they both red.” C WARE responded, “Nah, I’m on the other side, you at Citgo [U/I] Super Save?” Individual A responded, “Super Save, aight.”

b. Based on the intercepted communications, at approximately 2:22 p.m., CPD conducted a traffic stop of Individual A in a black 2014 Ford Taurus sedan with Illinois license plate number DG29245 in the vicinity of a gas station located at W. 111th St. and S. State Street. During the stop, Individual A identified himself as [Individual A’s name] and provided police with his identification. Police recovered two grams of suspected narcotics from Individual A. According to the DEA Laboratory, the items recovered from Individual A tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 0.43 grams. During the stop, Individual A admitted he was the user of telephone number 773-***-0118.¹⁴

c. On or about July 12, 2022, at approximately 2:35 p.m. (TP1, Session 54522), C WARE, who was using Target Phone 1, had a phone conversation with an unknown individual, who was using phone number 773-***-5226. During that call, the unknown individual stated, “I’m sitting at the porch.” C WARE

¹⁴ During this stop, Individual A’s voice was recorded and, based on a comparison between Individual A’s voice and the user of telephone number 773-***-0118 during the July 6, 2022, 2:15 p.m. call, law enforcement confirmed that Individual A was using telephone number 773-***-0118 during this call.

responded: “I’m about to pull up. What you need? If I need you to come out, just come out. What you need?” The individual stated, “I need a soft [unit of powder cocaine or heroin].” C WARE responded, “All right.”

d. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted communications above, I believe that during the above calls from July of 2022, C WARE was working as a shift worker for the DTO, using Target Phone 1 to take customer orders, and discussed the places to meet with Individual A and an unknown narcotics customer so that C WARE could provide narcotics to Individual A and the unknown narcotics customer.

D. DARRELL BROOKS a/k/a “D”

i. On or About May 11, 2022, DARRELL BROOKS Uses Target Phone 1 to Distribute Approximately 18 Grams of a Heroin, Fentanyl, and a Fentanyl Analogue Mixture to CS4

64. On or about May 11, 2022, law enforcement arranged a controlled narcotics transaction between CS4 and DARRELL BROOKS, who was using Target Phone 1. More specifically, on or about May 11, 2022, at approximately 2:34 p.m., law enforcement met with CS1 and CS4 at a predetermined meet location and checked them for narcotics and other contraband, with none found.

65. At approximately 3:06 p.m. (TP1, Session 23941), BROOKS,¹⁵ who was using Target Phone 1, had a phone conversation with an unknown individual, who was using phone number 708-***-0913. During the call, BROOKS stated, “We on hold, man. We about to switch shifts . . . we waitin’ for them to drop some [narcotics] off. They just brung me the phone [Target Phone 1].”

66. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted communications above, I believe that during this call, BROOKS told a narcotics customer that BROOKS had just started a shift distributing narcotics using Target Phone 1 and that BROOKS was waiting for someone to drop off narcotics for BROOKS to sell.

67. At approximately 3:10 p.m., law enforcement observed KEVIN WARE¹⁶ and an unknown male exit the residence located at 12217 South Wallace, in Chicago,

¹⁵ BROOKS has been identified as the user of Target Phone 1 during this call and any other calls in which he is identified in this Affidavit as follows: on or about April 28, 2022, law enforcement conducted a traffic stop of a vehicle containing BROOKS and verified his identity via an Illinois driver’s license. During the traffic stop, BROOKS voice was recorded and, based on a comparison between BROOKS’ voice and the user of Target Phone 1 during calls in which BROOKS has been identified, law enforcement confirmed that BROOKS was using Target Phone 1 during this and other calls where indicated.

¹⁶ KEVIN WARE, and his visage and voice, has been known to law enforcement during a majority of this investigation. As detailed in the application underlying the interception order for the First Interception Period (21 GJ 444, Pallmeyer, C.J., April 20, 2022), which is incorporated herein by reference, K WARE was initially identified during the early stages of the investigation through a traffic stop on or about February 4, 2021.

Specifically, on or about February 4, 2021, law enforcement set up a controlled transaction in which CS1 and CS2 purchased narcotics from an individual named Michael Pearson, who was using Target Phone 1. During surveillance of the transaction, law enforcement observed K WARE distribute a Milk Duds box containing a bundle of 30 individually-wrapped plastic baggies of suspected narcotics to Pearson, who in turn distributed the narcotics to CS1 and CS2 in exchange for \$300. Law enforcement then performed a traffic stop on K WARE, who

and enter a black Hyundai Genesis vehicle with Illinois registration number CH17522 (the “Genesis”). A short time later, the Genesis pulled over across the street from the residence at 741 West 123rd Street. Law enforcement observed BROOKS exit the residence, walk to the Genesis, engage in conversation, and enter the driver’s seat of a nearby Toyota Highlander (the “Highlander”). Law enforcement observed the Genesis depart the area and pull over near 11749 South Union Ave, which, as described below, is a known stash house used by the DTO to store and deal narcotics.

68. At approximately 3:15 p.m., law enforcement supplied CS4 with \$500 in pre-recorded law enforcement funds and equipped CS4 and CS4’s vehicle with covert audio and video recording equipment.

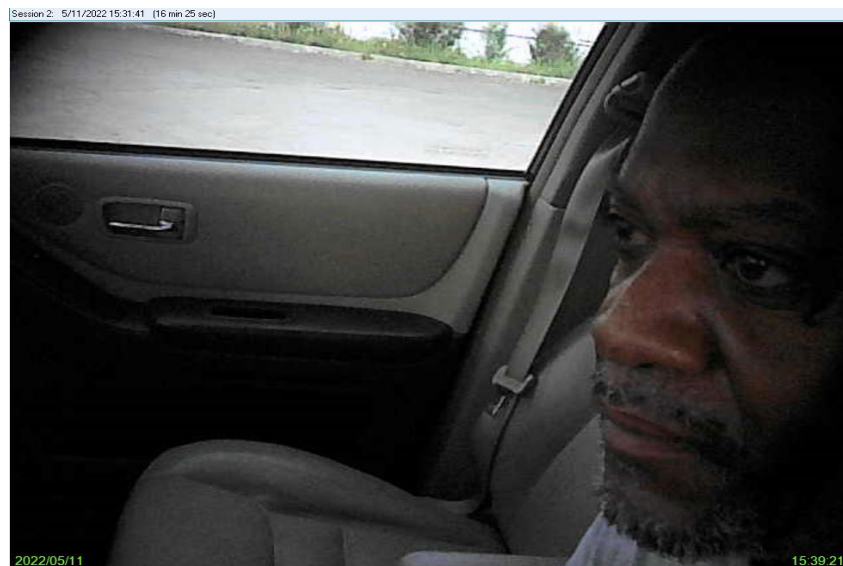
69. At approximately 3:33 p.m. (TP1, Session 23976), CS1 placed a recorded call to BROOKS, who was using Target Phone 1. During the call, CS1 indicated that he/she was near a gas station located near 115th and Halsted. BROOKS instructed CS1 to drive to pump 1. Specifically, CS1 and BROOKS had the following conversation:

CS1: I’m up here on 115th by the gas station on Wentworth. I mean
Halsted.

was driving in a silver Nissan Altima with Illinois registration number AN17585 (the “Silver Nissan”, discussed further below). According to Illinois Secretary of State vehicle registration records, the Silver Nissan is registered to T.B., who, based on law enforcement databases, property records, intercepted communications, and my knowledge of the investigation, was K WARE’s romantic partner. WARE was unable to produce a valid driver’s license or any other proper identification and provided CPD officers with fictitious information. WARE was released due to the ongoing investigation. Law enforcement then obtained a driver’s license photo of K WARE from a law enforcement database and CS1 positively identified K WARE as that of the driver of the Silver Nissan who had given the Milk Duds box containing narcotics to Pearson to sell. According to CS1, who has personally known K WARE for many years, K WARE is known by his nickname “Twin.” K WARE’s use of the nickname “Twin” and “Hustle” is confirmed by intercepted communications on Target Phones 1 and 2.

BROOKS: Where you at, Mobil gas station?
CS1: Yeah. Yeah. I'm up here.
BROOKS: Alright. Go over there by them 2 air pumps. A little close to pump 1. I'm gonna pull up on you right now.
CS1: Okay. By pump 1?
BROOKS: Yeah.
CS1: Okay. Alright, bro'.

70. According to CS4, law enforcement surveillance, and audio and video recordings, at approximately 3:36 p.m., CS1 and CS4 arrived at the gas station located near 115th and Halsted and parked at pump 8. Moments later, the Toyota Highlander arrived and parked at the station. CS4 exited his/her car, walked to the driver side window of the Highlander, and spoke with BROOKS. CS4 told Brooks that CS4 wanted "\$500 worth [of narcotics]" and that s/he wanted "grams." BROOKS stated, "I'm gonna go to my other car and get it; you stay right there" and departed the area. A still image of BROOKS from CS4's covert video recording device appears below:



71. At approximately 3:40 p.m., the Highlander exited the gas station and drove south on Halsted, while CS1 and CS4 remained in the CS vehicle at the gas

station. A still image of BROOKS departing the gas station taken from a law enforcement surveillance device appears below:



72. At approximately 3:44 p.m., BROOKS parked on 123rd Street, near 741 West 123rd Street, exited the Highlander, opened the driver's side door of a green Chevrolet Malibu, and put his hand into his pocket while walking back to the Highlander. BROOKS then drove the Highlander drive west on 123rd Street and north on Halsted. Law enforcement continued surveillance.

73. At approximately 3:47 p.m., the Highlander pulled back into the gas station near 115th and Halsted and parked behind the CS vehicle. CS4 got out of his/her car and entered the Highlander. Inside the Highlander, CS4 said, "I need some grams." BROOKS said, "I'm just a worker, man." BROOKS then gave CS4 a plastic bundle that contained 49 individually wrapped plastic baggies with blue Superman logos, each of which contained a white powdery substance. CS4 gave to

BROOKS \$500 of pre-recorded law enforcement funds. Before exiting the Highlander, CS4 asked BROOKS for his name. BROOKS responded: "I'm D."

74. CS4 exited the Highlander, walked back to CS4's car, and left the area. CS4 and CS1 reunited with law enforcement, who took custody of the baggies of narcotics. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 18 grams.

75. According to CS4, when CS4 first interacted with BROOKS, BROOKS thought that CS4 had \$50 and BROOKS pulled out 5 baggies, but when BROOKS realized that CS4 wanted more narcotics, BROOKS explained that he needed to leave to get more narcotics to fulfill CS4's order. BROOKS then left and returned a short time later and conducted the above-described narcotics transaction.

ii. BROOKS Uses Target Phone 1 to Coordinate Additional Narcotics Transactions

76. As discussed below, BROOKS used Target Phone 1 to arrange similar narcotics transactions on other occasions. For example:

a. On or about May 3, 2022, at approximately 4:33 p.m. (TP1, Session 13894), BROOKS, who was using Target Phone 1, had a recorded phone conversations with an unknown individual who was using telephone number 708-***-4187. During the call, the unknown individual told BROOKS, "I need to see you bro." BROOKS responded, "Alright. I'll be there in a few minutes. I'm on Michigan now, finna go down a hill, then I come straight to you next." The unknown individual asked, "You got both? [cocaine and heroin]," to which BROOKS responded, "No, I just

got the soft [powder heroin or cocaine]. I didn't bag no hard [crack cocaine]." The unknown individual stated, "Alright. I still need to see you, though." BROOKS responded, "Alright here I come. Just answer your phone." The unknown individual stated, "Okay. I'm waiting on you."

b. On or about May 9, 2022, at approximately 7:50 p.m. (TP1, Session 21550), an unknown male referred to in other intercepted communications as "Wayne," using telephone number 773-***-6171, had a conversation with BROOKS, who was using Target Phone 1. During the call, BROOKS said, "Come on out." Wayne replied, "Okay, okay." BROOKS stated, "I ain't no hard. Just soft" [I don't have crack cocaine, only powder cocaine or heroin]. WAYNE replied, "Okay cool. That's all I need. Okay." BROOKS stated, "All right...Come on my side of the car."

c. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that in the above calls from May of 2022, BROOKS was working as a shift worker for the DTO, using Target Phone 1 to take customer orders, and that (1) BROOKS informed the customers that he did not have crack cocaine, and (2) BROOKS arranged to meet the customers to sell them powder cocaine or heroin.

E. BRANDAN ALLEN a/k/a “B Ride”

i. On or about February 9, 2022, BRANDAN ALLEN Uses Target Phone 1 to Distribute Approximately 5.86 Grams of a Heroin and Fentanyl Mixture to CS-3.

77. In February 2022, law enforcement arranged a controlled transaction between CS1, CS3, and BRANDAN ALLEN, who was utilizing Target Phone 1. Specifically, on or about February 8, 2022, at approximately 10:29 a.m., CS1 placed a recorded telephone call to ALLEN,¹⁷ who was using Target Phone 1. During the recorded call, CS1 told ALLEN that CS1’s associate, CS3, would be calling Target Phone 1 to buy narcotics. At approximately 11:27 a.m., CS3 placed a recorded call to ALLEN, who was using Target Phone 1, and said that CS3 “need like 5 of em’ [units of narcotics].”

78. The next morning, on or about February 9, 2022, CS3 and ALLEN, using Target Phone 1, had recorded calls and discussed meeting that day for a narcotics transaction. Specifically, at approximately 10:19 a.m., CS3 placed a recorded call to ALLEN, who was using Target Phone 1, and stated that CS3 would be at 115th and Halsted Street in 15 minutes and reiterated that s/he needed “bout 5 of em [units of narcotics].” Roughly one minute later, at approximately 10:20 a.m., CS-3 made

¹⁷ ALLEN has been identified as the user of Target Phone 1 during this call and any other calls in which he is identified in this affidavit as follows: As detailed below, after the February 9, 2022 transaction and May 14, 2022 controlled transaction, law enforcement conducted traffic stops of ALLEN’s vehicle and verified his identify via an Illinois driver’s license. During the traffic stops, ALLEN’s visage and voice were recorded with body worn camera (“BWC”) and, based on a comparison between ALLEN’s voice and the user of Target Phone 1 during the February 9, 2022 call, law enforcement confirmed that ALLEN was using Target Phone 1. Additionally, law enforcement showed a driver’s license photograph of ALLEN to CS3, who confirmed that ALLEN was the individual who sold him narcotics on February 9, 2022.

another recorded call to ALLEN, who was using Target Phone 1, and stated, “I just need the 5 grams so I can check it out so I could see what’s to it.” ALLEN replied, “aight aight.” At 10:51 a.m., 11:03 a.m., and 11:08 a.m., CS3 placed additional recorded calls to ALLEN, who was using Target Phone 1, and they agree to meet outside a candy store in the vicinity of West 113th Street and South Michigan Avenue so that CS-3 could purchase narcotics from ALLEN.

79. Prior to the controlled narcotics transaction, law enforcement searched CS3 for contraband or excess currency, with none found, and equipped CS3 with covert audio and video recording equipment and gave CS3 \$120 in pre-recorded law enforcement funds to use as buy money for the transaction. CS3 then departed for the meet location.

80. According to CS3, law enforcement surveillance, and audio and video recordings of the transaction, at approximately 11:09 a.m., ALLEN arrived at the meet location driving a black Toyota Camry with Illinois license plate number Q874156 (the “Camry”).¹⁸ CS3 entered the front passenger side of the Camry and ALLEN distributed to CS3 a bundle containing 16 individually wrapped plastic baggies that each contained a white powdery substance. In return, CS3 gave \$120 in pre-recorded law enforcement funds to ALLEN. According to the DEA laboratory, the contents of the plastic baggies tested positive for the presence of heroin and fentanyl and weighed approximately 5 grams.

¹⁸ According to Illinois Secretary of State vehicle registration information, the Camry is registered to ALLEN.

81. Additionally, according to CS3, after ALLEN distributed the baggies of narcotics to CS3, another unidentified male approached ALLEN in the driver's seat of the Camry and ALLEN sold two individually wrapped plastic baggies containing a white powdery substance to the unidentified individual in exchange for \$15.

ii. On or about May 14, 2022, BRANDAN ALLEN Uses Target Phone 1 to Distribute Approximately 17.2 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to CS4

82. On or about May 14, 2022, law enforcement arranged a controlled narcotics transaction between CS1, CS4 and ALLEN. More specifically, on May 14, 2022, at approximately 12:06 p.m. (TP1, Session 27165), CS1 made a recorded call to ALLEN, who was using Target Phone 1. During the call, CS1 said, "Hey my man [CS4] he is on 116th and State. I can't come out today bro. You know my guy [CS4] I was with?" ALLEN replied, "Yeah." CS1 said, "He [CS4] on 116th. He steady trying to call you saying you not picking up. So he finna call you right now, man." ALLEN replied, "Aight."

83. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation, CS1 explained to ALLEN that CS4 was trying to get in touch with ALLEN on Target Phone 1 in order to purchase narcotics, but that sCS4 could not get in contact with ALLEN.

84. At approximately 12:13 p.m., CS4 arrived at the intersection of W. 116th Street and S. State Street in anticipation of the controlled narcotics transaction. Prior

to arriving at the meet location, law enforcement searched CS4 for contraband or excess currency, with none found, and equipped CS4 with covert audio and video recording devices. Law enforcement also gave CS4 \$500 in pre-recorded law enforcement funds to use for the controlled transaction.

85. Between approximately 12:25 p.m. and 1:08 p.m., CS4 made multiple attempts to contact ALLEN on Target Phone 1. At approximately 1:08 p.m. (TP1, Session 27283), CS4 received a recorded call from ALLEN, who was using Target Phone 1. ALLEN said, “Yeah, I’m right here by this building bro on State. Yo! . . . [i]n old folks building bro . . . [y]ou on 116th and State right?” CS4 replied, “I’m right here by this [U/I] I’m at the stop sign. Well I mean it ain’t the stop sign but [U/I] down the street . . . [t]hat’s you in the little black car?” ALLEN said, “Yea, come on bro.”

86. According to law enforcement surveillance, CS4, and audio and video recordings, at approximately 1:09 p.m., ALLEN, driving the Camry, drove north on State Street and parked near 116th Street and State Street. CS4 exited his/her vehicle, entered the front passenger seat of the Camry, and exited the Camry about three minutes later. CS4 reunited with law enforcement and explained that ALLEN told CS4 that ALLEN did not have enough narcotics to sell CS4 50 baggies, as CS4 had requested, so ALLEN had to go get permission from his boss to sell 50 baggies of narcotics to CS4. ALLEN further told CS4 to meet ALLEN at W. 114th and Wallace Street, where ALLEN would be able to sell 50 baggies of narcotics to CS4.

87. At approximately 1:26 p.m. (TP1 Session 27300), CS4 received a recorded phone call from ALLEN, who was using Target Phone 1. During the call,

ALLEN said, "You on Wallace?" CS4 replied, "I'm about 2-3 minutes away from you." ALLEN said, "Aight, I'm finna pull up man...matter of fact, come right here to 115th and Parnell." CS4 said: "Aight, I got you." CS4 then departed to meet with ALLEN.

88. At approximately 1:38 p.m., CS4 arrived near the intersection of W. 115th Street and S. Parnell Avenue and parked next to the Camry. According to CS4, law enforcement surveillance, and audio and video recordings of the interaction, CS4 exited his/her vehicle and entered the front passenger seat of the Camry. Once inside the Camry, ALLEN distributed 50 baggies of narcotics to CS4. CS4 then gave \$500 of pre-recorded law enforcement funds to ALLEN and ALLEN provided \$105 in change back to CS4. CS4 then departed and reunited with law enforcement, who took custody of the narcotics. According to the DEA Laboratory, the substance in the baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 17.2 grams.

89. At approximately 1:41 p.m., ALLEN departed the meet location. Law enforcement maintained constant surveillance on ALLEN from the time he departed the meet location with CS4 and conducted a traffic stop on the Camry that ALLEN was driving at approximately 2:18 p.m., near the intersection of W. 119th Street and S. Ada Street. The driver of the Camry identified himself as BRANDAN ALLEN and provided law enforcement with his Illinois driver's license which confirmed ALLEN's identity. BWC still images of ALLEN's Camry and of ALLEN from the May 14, 2022 traffic stop appear below:



iii. On or About September 16, 2022, ALLEN Uses Target Phone 1 to Distribute Approximately 19.6 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC2

90. On or about September 16, 2022, law enforcement arranged a controlled narcotics transaction between UC2, CS3, and ALLEN, who was using Target Phone 1. More specifically, on or about September 16, 2022, at approximately 11:08 a.m. (TP1, Session 80175), UC2 had the below recorded call with ALLEN, who was using Target Phone 1:

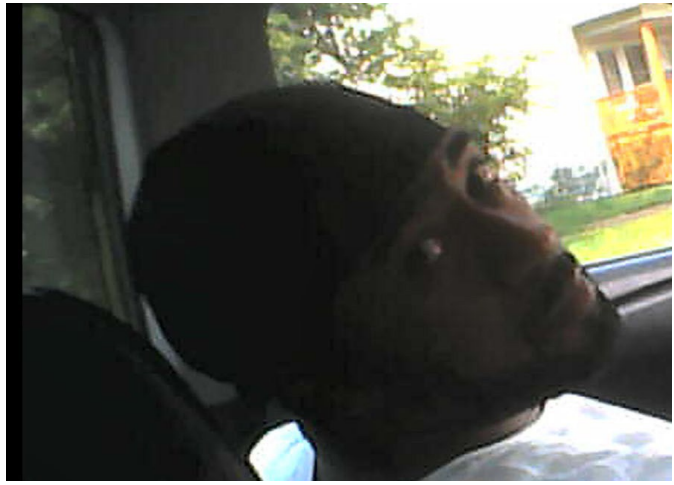
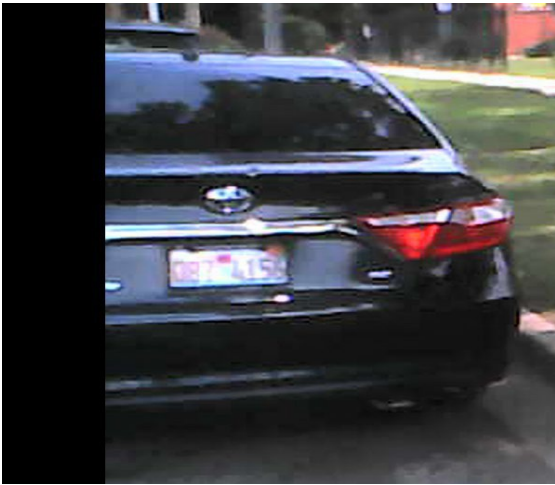
ALLEN: Yo? Yo?
UC2: Hey, this [UC2], This Cuzzo?
ALLEN: What's up? Yeah.
UC2: Hey, we over . . . me and my guy [CS3] over on 119th, this is his phone, I'm glad you got it locked in [glad that ALLEN had saved CS3's phone number]. Um we both trying to spend a little bit [of money on narcotics], over two- two [\$200] each. Can you take care of us?
ALLEN: You said ya'll finna spend two [\$200] each?
UC2: Yeah.
ALLEN: Yes of course.
UC2: I'ma spend two, he [CS3] gonna spend two.
ALLEN: Of course, of course, I'm about to uh, I'm about to make this call. I'm about to call you right back.
UC2: Okay we gonna be on 119th and Michigan, cause I gotta take care of some business right there, okay?
ALLEN: Okay, yeah go ahead.

91. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation ALLEN and UC2 agreed to meet near the intersection of E. 119th Street and S. Michigan Avenue in Chicago so that UC2 and CS3 could each purchase approximately \$200 worth of narcotics from ALLEN.

92. At approximately 11:12 a.m., UC2 and CS3 arrived at the intersection of E. 119th Street and S. Michigan Avenue. Prior to arriving at the meet location, law enforcement searched CS3 for contraband or excess currency, with none found, and equipped CS3 with covert audio and video recording devices. Law enforcement also provided UC2 and CS3 with pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

93. At approximately 11:34 a.m. and 11:54 a.m. (TP1, Sessions 80207, 80242), UC2 had recorded phone calls with ALLEN, who was using Target Phone 1, and they coordinated a meeting point. At approximately 11:56 a.m., law enforcement observed the Camry, driven by ALLEN, arrive and park at the intersection of E. 119th Street and S. Indiana Avenue. According to UC2, CS3, law enforcement surveillance, and audio and video recordings, at approximately 11:59 a.m., UC2 and CS3 approached the Camry and entered the back seat. ALLEN then distributed 52 baggies of narcotics to UC2 and CS3. In return, UC2 and CS3 gave \$410 in pre-recorded law enforcement to ALLEN. While in the car, UC2 and CS3 both spoke with ALLEN about

purchasing more narcotics from ALLEN in the future. Still images from UC2's covert video recording device appear below:



94. According to the DEA Laboratory, the contents of the 53 baggies tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 19.6 grams.

iv. On or About September 24, 2022, ALLEN Uses Target Phone 1 to Distribute Approximately 48 Grams of a Heroin and Fentanyl Analogue Mixture to CS3

95. On or about September 23, 2022, law enforcement arranged a controlled narcotics transaction between CS3 and ALLEN, who was using Target Phone 1. Specifically, on or about September 23, 2022, at approximately 11:10 a.m., CS3 had the below recorded call with ALLEN, who was using Target Phone 1:

ALLEN: Yo?
CS3: Hey, what up bro, this [UC2]'s guy.
ALLEN: What's up, what's up?
CS3: Hey, I'm gonna get at you [purchase narcotics] tomorrow morning ... uh ... shit, I got a stack [cash to purchase narcotics], what you can do for me?
ALLEN: Ok. Hold on one second bro...

CS3: Yeah, I'm coming tomorrow morning. I want to be on point, so I can get in and out. Uh, so I got a stack [cash for narcotics], what can you do for me though?

ALLEN: Uh...I mean...shit. What we've been doing. I gotcha...Alright, you know...you know...you...you...motherfuckers been treating you good? So, you know. Have them motherfuckers been treating you good [have the narcotics been satisfactory]?

CS3: Yeah...yeah, it could be better, but, but, I like, I like, I like, you know what I'm saying ... how the lick read, you know what I'm saying? It's [the narcotics] been better than anything I've been grabbing, so I'm gonna keep fucking with it, cause its working for me, you know?

ALLEN: Okay, say no more, shit

CS3: Tomorrow morning; I'll be there around ten, somewhere in between ten or eleven, I'll be there.

96. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation, ALLEN was asking CS3 how CS3 was enjoying the quality of the narcotics that CS3 had been purchasing from the DTO. CS3 said that the drugs "could be better" but that the drugs were better than any other narcotics that were available, so CS3 would continue to purchase narcotics from the DTO.

97. The next day, on or about September 24, 2022, at approximately 10:16 a.m. (TP1, Session 89358) CS3 made a recorded phone call to ALLEN, who was using Target Phone 1. During the call ALLEN and CS3 agreed to meet at the Target store at the intersection of E. 110th Street and S. Union Avenue, in Chicago, to conduct a narcotics transaction. Prior to departing for the meet location, law enforcement searched CS3 for contraband or excess currency, with none found, and equipped CS3

with covert audio and video recording devices. Law enforcement provided CS3 with \$1,000 in pre-recorded law enforcement funds to use for the narcotics transaction.

98. According to CS3, law enforcement surveillance, and audio and video recordings, at approximately 10:39 a.m., ALLEN arrived in near the intersection of E. 110th Street and S. Union Avenue driving the Camry. CS3 exited his/her vehicle and entered the front passenger seat of the Camry. Inside the Camry, ALLEN distributed five bundles containing 129 individually wrapped baggies to CS3. In return, CS gave \$1,000 or pre-recorded law enforcement funds to ALLEN. A still image of ALLEN from CS3's covert recording device appears below:



99. After the transaction, CS3 reunited with law enforcement who took possession of the five bundles that contained the 129 individually wrapped baggies. According to the DEA Laboratory, the contents of the baggies tested positive for presence of a mixture of heroin and the fentanyl analogue p-fluorofentanyl and weighed approximately 48 grams.

v. Allen Uses Target Phone 1 to Coordinate Other Narcotics Transactions

100. As discussed below, ALLEN used Target Phone 1 to arrange similar narcotics transactions on other occasions. For example:

a. On or about July 10, 2022, at approximately 10:16 a.m. (TP1, Session 52053), ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown male, who was using telephone number 312-***-2443. During this call, the unknown male stated, “Come on down 118th and Princeton.” ALLEN asked, “A’ight, what you needed?” The unknown male responded, “A couple defense [heroin], a couple soft [powder cocaine or heroin].” ALLEN stated, “Okay, okay, okay. I’m waiting on—okay, I’m waiting on that right now.” The unknown male stated, “A’ight” and ALLEN stated, “A’ight.”

b. On or about September 11, 2022, at approximately 11:12 a.m. (TP1, Session 74207), ALLEN, who was using Target Phone 1, had a phone conversation with an unknown male, who was using telephone number 773-***-9097. During this call, the unknown male said, “Hey nephew, check it out. I need two sets [2 units of narcotics] when you come, man.” ALLEN responded, “I got you.” The unknown male stated, “Okay I was just letting you know what I want and shit.” ALLEN stated, “Alright.”

c. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I

believe that during the above calls ALLEN was working as a shift worker for the DTO, using Target Phone 1 to take customer orders. More specifically, during the July 10, 2022 call, ALLEN, using Target Phone 1, asked a customer what type of narcotics the customer was interested in purchasing, that the customer requested heroin and powder cocaine, and that ALLEN indicated he was waiting to be re-supplied with the narcotics. Furthermore, during the September 11, 2022 call, ALLEN, using Target Phone 1, arranged to sell two units of narcotics to another narcotics customer.

F. RICKY WILLIAMS a/k/a “Buddy Love”

i. On or About October 4, 2022, RICKY WILLIAMS Uses Target Phone 1 to Distribute Approximately 7.15 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to UC1

101. On or about October 4, 2022, law enforcement arranged a controlled narcotics transaction between UC1 and WILLIAMS, who was using Target Phone 1. More specifically, on or about October 4, 2022, at approximately 4:28 p.m., (TP1, Session 103460), UC1 had the below recorded call with WILLIAMS.¹⁹, who was using Target Phone 1:

¹⁹ WILLIAMS has been identified as the user of Target Phone 1 during this call and any other calls in which he is identified in this Affidavit as follows: as described below, CS3 and the UCs had various recorded calls with WILLIAMS using both Target Phone 1 and telephone number 773-***-8730 (“WILLIAMS Phone 1”) to plan narcotics transactions. On or about October 4, October 5, October 21, and November 3, 2022, the UCs and/or CS3 met in person with WILLIAMS and executed the narcotics transactions they had discussed over both Target Phone 1 and WILLIAMS Phone 1. After the controlled transactions, law enforcement showed the UCs and CS3 known photographs of WILLIAMS from law enforcement databases, and they confirmed after each controlled transaction that the individual who sold them narcotics was WILLIAMS. Additionally, on or about July 6, 2022, law enforcement conducted a traffic stop of a vehicle WILLIAMS was driving and verified his identify via his Illinois driver’s

WILLIAMS: Hello?
 UC1: Hey, what's up baby, this is [UC1].
 WILLIAMS: Who?
 UC1: [UC1]...
 WILLIAMS: What up? Where you at?
 UC1: I'm finna, I'm walking, umm, shit, I'm walking toward 115th and Michigan, you know that dollar store up there, that Family Dollar.
 WILLIAMS: Yeah....
 UC1: I'm going up there, I'm gonna be up in there.
 WILLIAMS: Aite [U/I]

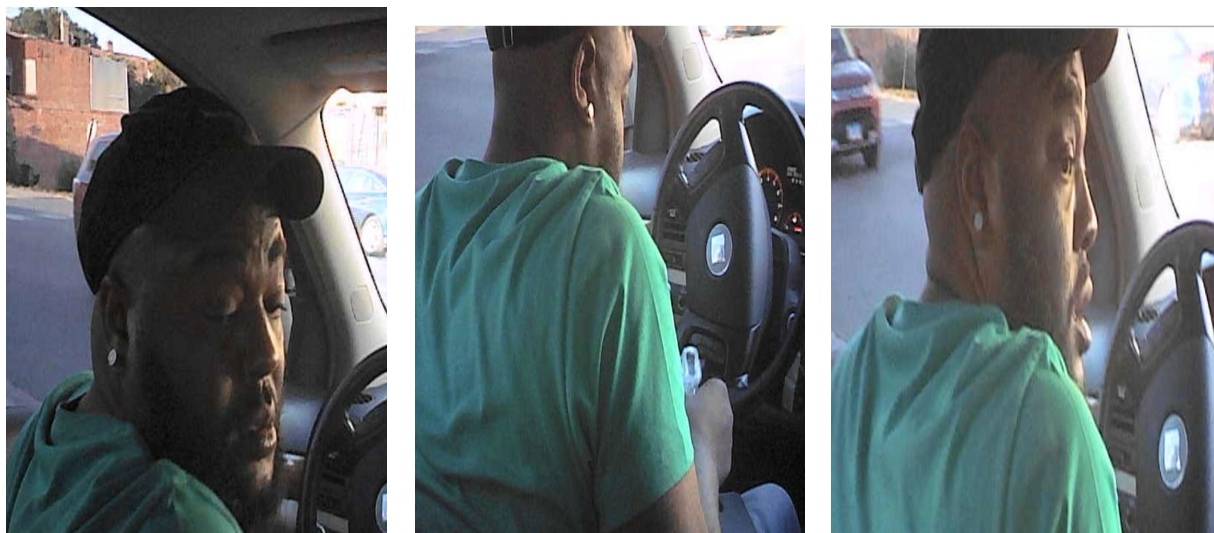
102. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversation UC1 told WILLIAMS that UC1 wanted to meet WILLIAMS at the Family Dollar store located at the intersection of E. 115th Street and S. Michigan Avenue in order to purchase narcotics.

103. Law enforcement set up surveillance at the intersection of E. 115th Street and S. Michigan Avenue. At approximately 5:09 p.m., UC1, equipped with covert audio and video recording equipment, arrived at the Family Dollar store. According to UC1, law enforcement surveillance, and audio and video recordings of the encounter, at approximately 5:14 p.m., WILLIAMS arrived in the parking lot of the Family Dollar store driving a tan 2009 Saturn Outlook SUV with Illinois

license. During the traffic stop, WILLIAMS' voice was recorded, and based on a comparison between WILLIAMS' voice and the user of Target Phone 1 during the October 4, 2022, 4:28 p.m. call (TP1, Session 103460), and other calls in which WILLIAMS has been identified, law enforcement confirmed that WILLIAMS was using Target Phone 1 during this and other calls where indicated.

temporary registration 461AA549 (the “Saturn”).²⁰ UC1 entered the back seat of the Saturn and gave WILLIAMS \$200 in law enforcement funds. In exchange WILLIAMS distributed a bundle containing 20 individual plastic baggies that each contained a white powdery substance. WILLIAMS stated to UC1 that there were “20 [units of narcotics] in there.” UC1 took the bundle that contained the 20 individual plastic baggies.

104. After the transaction, UC1 reunited with law enforcement, who took custody of the bundle that contained the 20 individual plastic baggies. According to the DEA Laboratory, the substance within the baggies tested positive for a mixture of fentanyl, the fentanyl analogue p-fluorofentanyl, and heroin, and weighed approximately 7.15 grams. Still images of WILLIAMS captured by UC1’s covert video recording device appear below:



²⁰ According to Illinois Secretary of State vehicle registration records, the Saturn is registered to Ernest ROWLETTE, with an address of 12152 S. Harvard Avenue, Chicago, IL.

ii. **On or about October 5, 2022, WILLIAMS Uses Target Phone 1 to Distribute Approximately 52 Grams of a Heroin, Fentanyl, and a Fentanyl Analogue Mixture to UC2**

105. On or about October 5, 2022, law enforcement arranged a controlled narcotics transaction between CS3, UC2 and WILLIAMS, who was using Target Phone 1. More specifically, on or about October 5, 2022, at approximately 3:58 p.m., (TP1, Session 105306) CS3 had the below recorded call with WILLIAMS, who was using Target Phone 1:

CS3: Hey, I'm trying to slide out [meet with you]...I'm trying to slide out that way...with this stack [cash], jack.

WILLIAMS: Huh?

CS3: I'm trying to slide out there with this stack.

WILLIAMS: Come on.

CS3: This [CS3] homie.

WILLIAMS: Aight, come on.

CS3: Aight, I'm uh...I'm gonna send my girl [UC2], when she gets close, uh, she gonna hit you?

WILLIAMS: Aight bet.

CS3: Aight.

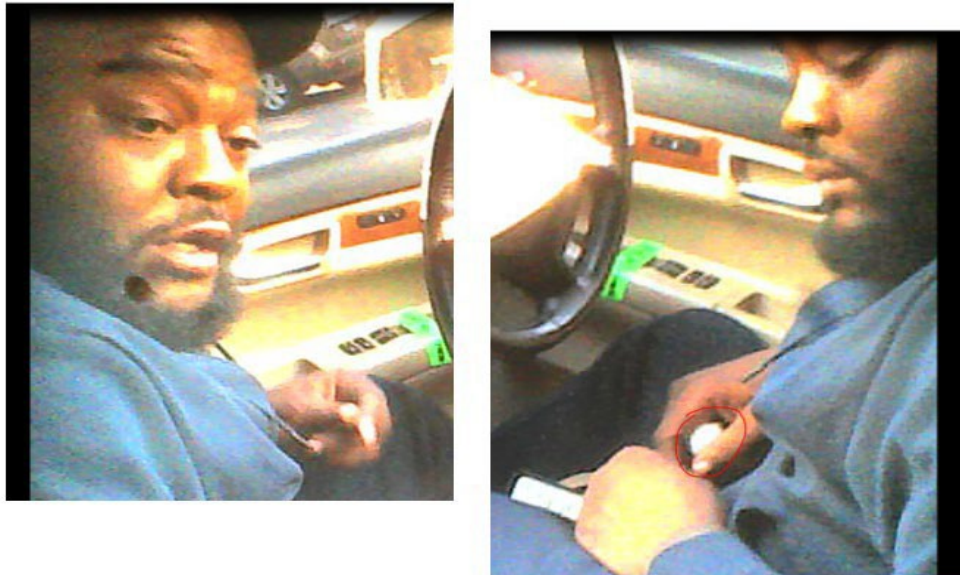
106. At approximately 4:45 p.m. (TP1, Session 105387), UC2 called WILLIAMS, who was using Target Phone 1. During the call, UC2 said: "Hello." WILLIAMS said, "Where you at?" UC2 said, "this [UC2]...Yea my boy [CS3] called you. I got 1,500 [\$1,500 to purchase narcotics]. I'm over near Roseland." WILLIAMS said, "Meet me on...meet me on uh...meet me at 119th and Halsted at the Family Dollar right there." UC2 replied, "I'm in Roseland Hospital, if you get over here, you call me I can come on out. I got [\$]1,500, my boy [CS3] called you earlier." WILLIAMS said, "Meet me at that subway right there across the street from Roseland."

107. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversations UC2 and WILLIAMS arranged to meet at the Family Dollar store near the intersection of South Halsted Street and West 119th Street so WILLIAMS could distribute narcotics to UC2.

108. Approximately 12 minutes later, at 4:57 p.m. (TP1, Session 105404), UC2 had a call with WILLIAMS, who was using Target Phone 1. During the call WILLIAMS asked UC2 where the UC2 was waiting, and UC2 replied, "I'm by the subway, in the mall." WILLIAMS said, "I'm pulling up now, I'm pulling in now. What you got on?" UC2 replied, "I got on a blue jean jacket and my little shower cap."

109. According to UC2, law enforcement surveillance, and an audio recording of the ensuing encounter, UC2, who was equipped with covert audio and video recording devices, parked his/her vehicle and walked toward the subway lot on East 111th Street and South Perry Avenue, as WILLIAMS had instructed. WILLIAMS then arrived in the area in the Saturn and UC2 entered the front passenger seat. Inside the Saturn, UC2 told WILLIAMS that his/her "friend" (CS3) wanted to purchase narcotics from WILLIAMS. UC2 and WILLIAMS agreed that CS3 would call WILLIAMS in advance and WILLIAMS would have narcotics ready for CS3. WILLIAMS then gave UC2 his personal telephone number, 773-***-8730

(“WILLIAMS Phone 1”), and gave UC2 his nickname, “Buddy.”²¹ WILLIAMS then distributed six bundles containing 150 individually wrapped baggies containing a white powdery substance to UC2. In return, UC2 gave WILLIAMS \$1,500 in pre-recorded law enforcement funds, which WILLIAMS counted in the car. Below are screenshots of WILLIAMS captured by UC2’s covert video recording device:



110. UC2 reunited with law enforcement who took custody of the six bundles containing 150 individually wrapped baggies. According to DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of fentanyl, the fentanyl analogue p-fluorofentanyl, and heroin, and weighed approximately 52 grams.

²¹ Based on intercepted communications, my knowledge of the investigation, and the knowledge of other agents with familiarity of the investigation, I know that “Buddy Love” is WILLIAMS’ nickname.

iii. On or About October 21, 2022, WILLIAMS Distributes Approximately 25.3 Grams of a Heroin, Cocaine, and Fentanyl Mixture to CS3

111. On or about October 18, 2022, law enforcement arranged a controlled narcotics transaction between WILLIAMS and CS3. Specifically, on or about October 18, 2022, at approximately 5:57 p.m., CS3 made a recorded call to WILLIAMS, who was using Target Phone 1, and asked to purchase narcotics. WILLIAMS told CS3 to call him back on his personal phone (WILLIAMS Phone 1). CS3 then placed a recorded call to WILLIAMS Phone 1. During the ensuing conversation, CS3 and WILLIAMS agreed to meet at the Family Dollar store located at the intersection of E. 119th Street and S. Halsted Street on October 21, 2022 so that CS3 could purchase 25 grams of narcotics from WILLIAMS for \$1,500.

112. On or about October 21, 2022, prior to the controlled transaction, law enforcement searched CS3 for contraband and excess currency, with none found, and equipped CS3 with covert audio and video recording devices. Law enforcement also provided \$1,500 in pre-recorded law enforcement funds to CS3 for use in the controlled transaction. CS3 then departed for the Family Dollar.

113. At approximately 11:03 a.m., WILLIAMS placed a recorded call CS3 and told CS3 to hurry up because, “I don’t want to be sitting around with that shit [narcotics].” At approximately 11:15 a.m., CS3 texted WILLIAMS “Im in the Family Dollar parking lot.” At approximately 11:56 a.m., WILLIAMS texted CS3 “Grab it from [him] 10 minutes.”

114. According to CS3, law enforcement surveillance, and audio/video recordings of the controlled transaction, at approximately 12:09 p.m., WILLIAMS arrived at the meet location driving the Saturn. CS3 exited his/her car and entered the front passenger side of the Saturn. Once inside the Saturn, CS3 gave WILLIAMS \$1,500 in pre-recorded law enforcement funds. In return, WILLIAMS distributed a plastic baggie that contained narcotics. A screenshot of WILLIAMS captured by CS3's video recording device appears below:



115. CS3 exited the Saturn and reunited with law enforcement, who took custody of the baggies. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of heroin, cocaine, and fentanyl and weighed approximately 25.3 grams.

iv. On or About November 3, 2022, WILLIAMS Distributes Approximately 50.2 Grams of a Fentanyl and Heroin Mixture to CS3

116. On or about November 1, 2022, law enforcement arranged a controlled narcotics transaction between CS3 and WILLIAMS. More specifically, on or about

November 1, 2022, at approximately 4:18 p.m., CS3 texted WILLIAMS, who was using WILLIAMS Phone, and wrote, “Imma slide on you thursday 50.” Based on my training, experience, my knowledge of the investigation, and the content and context of the communication, I believe that during this communication, CS3 was telling WILLIAMS that CS3 was going to meet WILLIAMS on Thursday to purchase 50 grams of narcotics. WILLIAMS responded “okay, okay.”

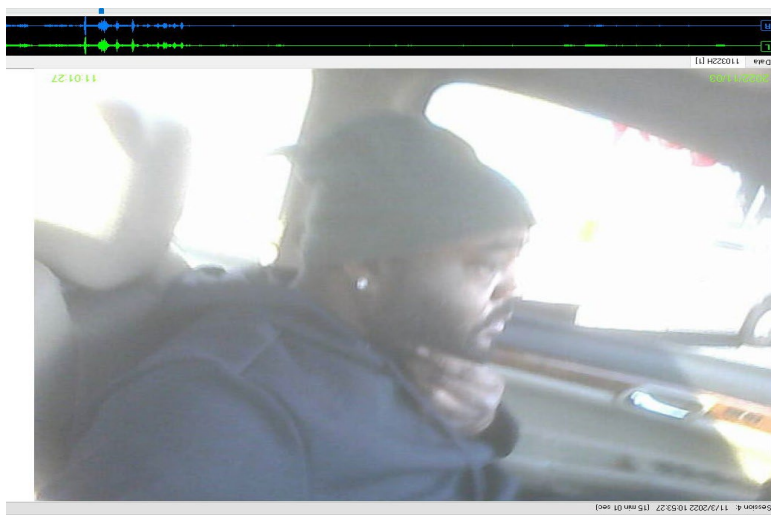
117. The next day, on or about November 2, 2022, at approximately 7:15 p.m., CS3 texted WILLIAMS, “I’ll be that way tomorrow 11am maybe sooner hit you when im in route so we’ll be on point.” WILLIAMS responded, “Ok cool.”

118. The next day, on or about November 3, 2022, prior to the controlled transaction, law enforcement searched CS3 for contraband or excess currency, with none found. Law enforcement equipped CS3 with covert audio and video recording devices and provided CS3 with \$3,000 in pre-recorded law enforcement funds to use for the controlled transaction. CS3 then departed for the meet location at the Family Dollar located at E. 119th Street and S. Halsted.

119. At approximately 10:44 a.m., CS3 arrived at the meet location in his/her car, made a recorded call to WILLIAMS and told WILLIAMS s/he had arrived. WILLIAMS responded, “Where you is at?...Aight, I finna pull up there.” At approximately 11:00 a.m., law enforcement observed WILLIAMS, driving the Saturn, arrive at the Family Dollar parking lot. At the same time, CS3 received a recorded call from WILLIAMS, who was using WILLIAMS’ Phone. WILLIAMS stated, “I’m pulling in now...whatchu in, uh, the silver truck?” CS3 said, “Yea, still in the same

one.” WILLIAMS said, “you see me right here coming toward you...aight, I see you I see you.” WILLIAMS then parked next to CS3’s car.

120. According to CS3, law enforcement surveillance, and video and audio recordings of the controlled transaction, CS3 exited his/her car and entered the Saturn. Inside the Saturn, WILLIAMS distributed a bundle containing 50 individually wrapped baggies to CS3 and CS gave \$3,000 in pre-recorded law enforcement funds to WILLIAMS. A screenshot of WILLIAMS captured by CS3’s covert video recording device appears below:



121. CS3 exited the Saturn and reunited with law enforcement who took possession of the bundle containing the 50 individually wrapped baggies. According to the DEA Laboratory, the contents of the baggies tested positive for the presence of a mixture of fentanyl and heroin and weighed approximately 50.2 grams.

v. WILLIAMS Uses Target Phone 1 to Coordinate Additional Narcotics Transactions

122. As discussed below in this affidavit, WILLIAMS used Target Phone 1 to arrange similar narcotics transactions on other occasions. For example:

a. On or about July 14, 2022, at approximately 7:05 p.m. (TP1, Session 56821), WILLIAMS, who was using Target Phone 1, had a conversation with an unknown female, who was using telephone number 224-***-7379. During the conversation, WILLIAMS answered, “Hello?” The unknown female said: “Yeah we want 6 [units of narcotics].” WILLIAMS asked, “Who?...Where y’all at?” The unknown female responded, “118th and Princeton.” WILLIAMS replied, “Alright. Be outside.” The unknown female replied, “All right.”

b. On or about July 22, 2022, at approximately 7:43 a.m. (TP1, Session 64155), WILLIAMS, who was using Target Phone 1, had a conversation an unknown male who was using telephone number 773-***-3228. During the conversation, the unknown male asked, “Can I get two hard [two quantities of crack cocaine]?” WILLIAMS responded, “Where you at?” The unknown male said, “117th and Michigan.” WILLIAMS said, “A’ight, I’ll call you once I get that way.”

c. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above calls from July of 2022, WILLIAMS was working as a shift worker for the DTO, using Target Phone 1 to take customer orders, and agreed to meet the customers to conduct the transactions.

III. KEVIN WARE Coordinates with DTO Members Regarding the Use of Target Phone 1 and the Distribution of Narcotics to Customers

123. As discussed above, during the conspiracy, members of the DTO used Target Phone 1 to arrange narcotics transaction with the UCs, CSs, and unidentified

customers. Moreover, as discussed below, members of the DTO worked shifts in which members of the DTO would take turns distributing narcotics to customers while using Target Phone 1. The members of the DTO reported their use of Target Phone 1 to K WARE, who oversaw the DTO, and the DTO members coordinated with K WARE regarding which member of the DTO would handle upcoming shifts.

A. On or About June 27, 2022, DARRELL BROOKS Communicates with KEVIN WARE About BROOKS' Use of Target Phone 1 and BROOKS' Narcotics Supply

124. As discussed below, on or about June 27, 2022, BROOKS worked a shift of distributing narcotics using Target Phone 1. Around the time that BROOKS began his shift, BROOKS, using phone number 708-***-0163 [BROOKS Phone 1]²², communicated with K WARE about BROOKS' supply of narcotics, and BROOKS continued to communicate with K WARE about BROOKS' narcotics supply throughout the rest of the shift using BROOKS Phone 1. On two occasions during the shift, K WARE provided narcotics to BROOKS to distribute.

125. More specifically, on or about June 27, 2022, at approximately 3:51 p.m. (TP1, Session 33840), BROOKS, who was using Target Phone 1, had a phone conversation with an unknown male, who was using the phone number 872-***-7726. During this call, BROOKS stated, "I just got the phone [Target Phone 1], but I'm waiting on him [K WARE] to drop something [narcotics] off to me."

²² BROOKS has been identified as the user of BROOKS Phone 1 in this call and other calls described in this affidavit as follows: as described above, law enforcement recorded and identified BROOKS voice on intercepted communications over Target Phone 1. Law enforcement has compared BROOKS voice on those communications with the voice heard on BROOKS Phone 1 and confirmed that the voice belongs to BROOKS.

126. Approximately one minute later, at approximately 3:52 p.m. (TP2, Session 16), BROOKS, who was using BROOKS Phone, had a phone conversation with K WARE, who was using Target Phone 2.²³ During this call, K WARE asked, “Guru [C WARE] ain’t give you one [narcotics]?” BROOKS responded, “No, Guru say he ain’t got none. I think Guru had like about four or five bags [of narcotics] he just showed me.” K WARE then stated, “No. Well, let me...I’m getting it [narcotics] ready. He gave you the phone [Target Phone 1]?” BROOKS responded, “Yeah, I got the phone [Target Phone 1].”

127. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above, I believe that on June 27, 2022, BROOKS obtained Target Phone 1 to start a shift of distributing narcotics at approximately 3:51 p.m. and that K WARE told BROOKS that K WARE would give narcotics to BROOKS to distribute. On subsequent calls, BROOKS, who was using Target Phone 1, informed narcotics customers that

²³ K WARE has been identified as the user of Target Phone 2 during this recorded phone call and others in the affidavit as follows: (i) during the February 4, 2021 controlled transaction with CS1 and CS2 discussed above, law enforcement obtained a recording of K WARE’s voice. Law enforcement has compared K WARE’s voice on the February 4, 2021 recording with the user of Target Phone 2 in this call and confirmed that the user was K WARE; (ii) law enforcement obtained a search warrant for cellular location information for Target Phone 2 on or about April 28, 2022 (22 M 334, Cummings, M.J.). Based on surveillance in conjunction with that location information, law enforcement determined that K WARE was the user of Target Phone 2 during the Second and Third Interception Periods; and (iii) law enforcement has obtained numerous recordings of K WARE’s voice during the course of the investigation and compared it with K WARE’s voice heard on the February 4, 2021 recorded traffic stop, and with K WARE’s voice captured during a recorded traffic stop on or about September 28, 2022, and determined that the user of Target Phone 2 was K WARE.

BROOKS was waiting for K WARE to deliver narcotics to BROOKS so that BROOKS could sell the narcotics to customers. For example:

a. At approximately 4:13 p.m. (TP1, Session 33856), BROOKS told an unknown male who was using the phone number 773-***-2227, “Waiting for him [K WARE] to drop it [the narcotics] off now. I’ll give you a call.” The unknown male responded: “Alright, I need 10 [units of narcotics].”

b. At approximately 4:46 p.m. (TP1, Session 33877), BROOKS told an unknown male who was using the phone number 773-***-2227, “Still waiting on Twin [K WARE] to drop it [narcotics] off.”

c. At approximately 5:00 p.m. (TP1, Session 33888), BROOKS told an unknown male who was using the phone number 815-***-4973, “We still on hold [BROOKS was still waiting for the narcotics from K WARE].” The unknown male asked, “You ain’t got no C [cocaine]?” BROOKS responded: “No.”

128. At approximately 5:08 p.m. (TP2, Session 46), K WARE, who was using Target Phone 2, had a phone conversation with BROOKS, who was using BROOKS Phone 1. During this call, K WARE told BROOKS, “I’m outside your crib.”

129. Based on my training and experience and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above and below, I believe that at approximately 5:08 p.m., K WARE arrived outside BROOKS’s residence to deliver narcotics to BROOKS. On subsequent calls, BROOKS, who was using Target Phone 1, spoke with narcotics customers, including

to an individual located at the Citgo gas station located at 115th and Halsted, about meeting with the customers to distribute those narcotics. For example:

a. At approximately 5:32 p.m.—approximately 20 minutes after K WARE told BROOKS that he was outside BROOKS’s house (TP1, Session 33916)—BROOKS, who was using Target Phone 1, told an unknown male who was using the phone number 815-***-1564: “He [WARE] just dropped the stuff [narcotics] off to us, I’ll be that way.”

b. At approximately 6:10 p.m. (TP1, Session 33972), BROOKS, who was using Target Phone 1, had a phone conversation with an unknown male, who was using the phone number 872-***-4474. During the call, the unknown male stated: “I’m almost there at the Citgo...pull up at the Citgo on 115th and Halsted.” BROOKS responded: “You gotta give me a minute, man.”

130. After dropping off the narcotics for BROOKS to sell, K WARE checked in with BROOKS on the sale of the narcotics. In particular:

a. At approximately 6:20 p.m. (about 10 minutes after BROOKS had the call with the unknown individual at the Citgo) (TP1, Session 33980), BROOKS, who was using Target Phone 1 had a phone conversation with K WARE, who was using Target Phone 2 (TP2, Session 61). During this call, K WARE asked BROOKS: “How you looking, man?” BROOKS replied: “Shit, I’m finna slide on...this the second one [bundle of narcotics] now. Had to play with this phone [Target Phone 1]. The brightness had went out. I’m starting on this ‘nother...this next one [starting to sell the next bundle of narcotics].” K WARE replied: “Man, you shoulda been done [selling

all the narcotics].” BROOKS replied, “But the door open on the green car.” K WARE then said, “Man, Citgo [U/I] wanted...she want 20 [units of narcotics].” BROOKS replied: “I just left her. No, she bought eight [units of narcotics].” WARE replied: “Oh.” BROOKS said, “But, I got it, though. She lost her damn phone...[U/I]...her phone wet. But, shit, let me take care of them [narcotics customers]. These people up here [narcotics customers].” WARE replied, “Go ahead.”

b. Based on my training, experience, the training and experience of other law enforcement officers involved in the investigation, and the content and context and context of the communication, I believe that K WARE was checking in with BROOKS regarding the sale of narcotics, and, consistent with the calls above, BROOKS explained that he had just sold eight units of narcotics to an individual at the Citgo gas station.

131. Later, also on or about June 27, 2022, K WARE gave an additional supply of narcotics for BROOKS to sell. BROOKS then continued to sell narcotics to customers. In particular:

a. At approximately 6:59 p.m. (about 40 minutes after he talked to K WARE) (TP1, Session 34010), BROOKS, who was using Target Phone 1, had a phone conversation with an unknown individual, who was using telephone number 773-***-2765. During this call, the unknown individual asked BROOKS: “Can I meet you somewhere or what’s happening?” BROOKS responded: “Shit, I’m waiting right now to get some [narcotics], man.” The unknown individual asked: “About how long you think?” and BROOKS responded: “Whenever he [K WARE] drop it [the narcotics]

off. I was just about to call him [K WARE], until you called, see if he dropped it [the narcotics] off...I gotta call him.”

b. Approximately one minute later, at roughly 7:00 p.m. (TP2, Session 74), BROOKS, who was using BROOKS Phone 1, had a phone conversation with K WARE, who was using Target Phone 2. During this call, K WARE said, “What up D [BROOKS]?” BROOKS responded, “Hey, you put that [narcotics] in the car?” K WARE said, “I’m on my way over there now.” BROOKS responded, “alright.”

c. Less than 15 minutes later, at approximately 7:13 p.m., law enforcement surveilling K WARE saw him approach a green 2004 Chevrolet Malibu with Illinois license plate number CW92565 (the “Green Malibu”) ²⁴ parked at approximately 723 W. 123rd St., open the front driver’s side door, reach inside, and then close the door and walk to the front of the vehicle before walking away.

d. At approximately 7:22 p.m., law enforcement saw an unknown male approach the Green Malibu, open the driver’s door, reach inside, retrieve an object, and close the door.

e. Shortly after, at approximately 7:28 p.m., BROOKS, who was using Target Phone 1, had a phone conversation with an unknown male, who was using the phone number 708-***-4700. During this call, BROOKS stated, “He [K WARE] just dropped the stuff [the narcotics] now. Here I come now.”

²⁴ According to Illinois Secretary of State vehicle registration records, the Green Malibu is registered to BROOKS with an address of 439 W. 62nd Street, Apartment 1, Chicago, Illinois. Law enforcement had previously observed the Green Malibu on or about May 11, 2022, when BROOKS told CS-4 that BROOKS was going to retrieve additional narcotics, and then law enforcement observed BROOKS approach the Green Malibu and retrieve suspected narcotics.

f. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, the surveillance described above, and content and context of the intercepted calls described above and below, I believe that (1) K WARE dropped off a resupply of narcotics in the Green Malibu for BROOKS; (2) that BROOKS retrieved the narcotics from the Green Malibu ; and (3) that BROOKS used Target Phone 1 to arrange a narcotics transaction with a customer.

132. During subsequent calls that same day, BROOKS, who was using Target Phone 1, spoke with narcotics customers about meeting with the customers to distribute narcotics. For example:

a. At approximately 8:33 p.m. (TP1, Session 34116), BROOKS had a phone conversation with an unknown individual, who was using phone number 773-***-2227. During that call, the unknown individual stated, “Hey, I want 12 of ‘em [12 units of narcotics]. 13 really.” BROOKS responded, “Alright, I’ll be there with it, in a minute.”

b. At approximately 9:19 p.m. (TP1, Session 34155), BROOKS had a phone conversation with an unknown individual, who was using phone number 773-***-5268. During this call, BROOKS stated: “I’ll be that way in a minute. Just answer your phone.” The unknown male responded: “Okay, do you have both of them [both types of narcotics]?” BROOKS replied: “No, just the soft [powder cocaine or heroin], man...I’ll be there, wait.”

B. On or About July 1, 2022, ERNEST ROWLETTE Receives Target Phone 1 from CHRISTOPHER WARE and Communicates with KEVIN WARE About ROWLETTE'S Narcotics Supply

133. As discussed below, on or about the evening of July 1, 2022, ERNEST ROWLETTE worked a shift distributing narcotics while using Target Phone 1. Prior to working his narcotics distribution shift, K WARE informed ROWLETTE that ROWLETTE would receive Target Phone 1 from C WARE, who worked the shift prior to ROWLETTE. After the narcotics distribution shift, ROWLETTE reported his remaining narcotics supply to K WARE. In particular:

a. On or about July 1, 2022, at approximately 10:33 p.m. (TP1, Session 39239), C WARE, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using phone number 872-***-6912. During the call, C WARE asked, "Where you at, bro?" The unknown individual responded, "115th and Princeton." C WARE then asked, "What you want, bro?" The unknown individual replied: "A hard [one unit of crack cocaine] and a soft [one unit of powder heroin or cocaine]. You got both [types of narcotics]?" C WARE stated, "I'm about to pull up. Come on out. Pulling up right in front of Nate crib, bro." The unknown individual stated: "All right."

b. Roughly 5 minutes later, at approximately 10:38 p.m. (TP2, Session 1266), K WARE, who was using Target Phone 2, had a phone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During this call, K WARE stated, "When Guru [C WARE] bring you the phone [Target Phone 1], tell Guru to call B-Ride [BRANDAN ALLEN], so we can take him that car. I got to meet B-Ride

with this shit...‘cause B-Ride gonna meet me.” ROWLETTE responded, “Alright.” K WARE then stated: “Or tell him [C WARE]...‘Twin [WARE] said B-Ride waiting on you ‘cause he got to meet Twin [K WARE] to get this.”

c. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted call described above, I believe that (1) on the evening of July 1, 2022, C WARE was working a narcotics distribution shift on Target Phone 1 distributing narcotics to customers and that at approximately 10:33 p.m., he communicated with a customer who requested crack cocaine and powder cocaine or heroin; (2) K WARE informed ROWLETTE that C WARE would be providing Target Phone 1 to ROWLETTE for the next narcotics distribution shift; and (3) K WARE instructed ROWLETTE to tell C WARE that K WARE was planning to meet ALLEN.

134. Later that evening, ROWLETTE began his narcotics distribution shift and used Target Phone 1 to arrange narcotics transactions with customers. For example:

a. At approximately 11:11 p.m., about 33 minutes after ROWLETTE spoke with K WARE, ROWLETTE, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using telephone number 312-***-1467 (TP1, Session 39267). During this call, ROWLETTE stated, “I got you.” The unknown individual responded, “Yeah, this 11311 South Wallace with the rock wife.” ROWLETTE stated, “Okay.” The unknown individual then asked: “I need two

[units of narcotics]. How long you gon' be?" ROWLETTE responded, "A couple minutes." The unknown individual said, "All right. I'll be waiting on my phone to ringing, sweetheart."

b. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above, I believe that during the above call, the unknown individual was a narcotics customer who was trying to purchase two units of narcotics from ROWLETTE, who was using Target Phone 1. I further believe that C WARE (who, as discussed above, arranged the sale of narcotics, using Target Phone 1, to a customer at 10:33 p.m.) provided Target Phone 1 to ROWLETTE at some point between 10:38 p.m. (when K WARE told ROWLETTE that C WARE would provide the phone to ROWLETTE) and 11:11 p.m. (when ROWLETTE arranged to provide two units of narcotics to a customer using Target Phone 1).

135. Based on subsequent intercepted communications, I believe that ROWLETTE continued to use Target Phone 1 to sell narcotics to customers on the evening of July 1, 2022, and that K WARE checked in with ROWLETTE the following day, on July 2, 2022, to determine how much narcotics ROWLETTE sold and how much narcotics ROWLETTE left for the next DTO shift worker. In particular:

a. On or about July 1, 2022, at approximately 11:34 p.m. (TP1, Session 39297), ROWLETTE, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using phone number 773-***-

9097. During this call, the individual stated, “Hello?” ROWLETTE stated, “Yeah, I’mma call you when I’m pulling up, playa.” The individual then said: “A’ight, yeah. I need...I need a 30 piece back [30 units of narcotics]. I want two of ‘em, though.” ROWLETTE stated: “A’ight.”

b. On or about July 2, 2022, at approximately 11:58 a.m. (TP2 Session 1392), K WARE, who was using Target Phone 2, had a phone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During the call, K WARE asked; “How many [narcotics] did you leave this morning?” ROWLETTE responded: “Three [units of narcotics].” K WARE asked: “So how you said you was crowded full of people and you’re smooth...You told me this morning, you not call again [U/I] in touch this, you said, no Ima take care of this [U/I], it was moving, it was lot of people.” ROWLETTE stated:” No, when I first got the line [Target Phone 1], there was like it was bagged up [the narcotics were bagged up when ROWLETTE first started using Target Phone 1].” K WARE asked: “How many did you do last night?” ROWLETTE responded: “I did three.”

C. On or About July 6, 2022, at the Direction of KEVIN WARE, CHRISTOPHER WARE Provides Target Phone 1 to RICKY WILLIAMS to Distribute Narcotics

136. As discussed below, on or about the afternoon of July 6, 2022, C WARE, while using Target Phone 1, was instructed by K WARE, to give Target Phone 1 to WILLIAMS, so that WILLIAMS could use Target Phone 1 to distribute narcotics.

137. More specifically, on or about July 6, 2022, at approximately 3:13 p.m. (TP2, Session 2477), K WARE, who was using Target Phone 2, had a phone

conversation with C WARE, who was using telephone number 773-***-5503 (C WARE Phone 1).²⁵ During this call, C WARE asked: “Who supposed to be getting the phone [Target Phone 1], nobody?” K WARE responded: “Call Buddy Love [WILLIAMS]. If Buddy Love don’t want it, nobody...take my car and put it at my crib.” C WARE stated: “I’ll keep it [Target Phone 1] ‘til 7:00.”

138. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls over Target Phone 1 described below, I believe that (1) on July 6, 2022, C WARE was using Target Phone 1 to sell narcotics to customers; (2) C WARE asked K WARE who would be using Target Phone 1 to sell narcotics to customers during the next shift after C WARE, and K WARE suggested calling WILLIAMS; and (3) C WARE indicated that he would continue to sell narcotics using Target Phone 1 until the shift change. Based on communications intercepted over Target Phone 1 around the time of this call, I believe that C WARE was using Target Phone 1 to coordinate drug transactions with customers and that WILLIAMS began using Target Phone 1 to do the same later that day. For example:

²⁵ CHRISTOPHER WARE has been identified as the user of C WARE Phone 1 as follows: I compared the voice heard on C WARE Phone 1 on the July 6, 2022 call described in this paragraph to the voice heard on the audio and video recordings made during the various UC and CS controlled transactions described elsewhere in this affidavit that involved C WARE and where C WARE was identified, and where C WARE was identified, and confirmed that it is CHRISTOPHER WARE’s voice.

a. At approximately 1:34 p.m. (TP1, Session 46805), C WARE, who was using Target Phone 1, had a recorded telephone conversation with an unknown male, who was using the telephone number 773-***-0845. During this call, the unknown male stated, "Hey what up buddy? This Walt right here on Parnell. I need both of them [types of narcotics], man. You got both of them?" C WARE responded, "Yeah." The unknown male then said, "Okay. Come on through. I'm waiting on you." C WARE responded, "Alright."

b. At approximately 2:47 p.m. (TP1, Session 46862), C WARE, who was using Target Phone 1, had a recorded telephone conversation with an unknown male, who was using the telephone number 773-***-0118. During this call, the unknown male stated: "Yeah, bro. So, I need to grab a couple more [more narcotics], man. Can I...Uh, I'm on Halsted. Where, where you at?" C WARE responded: "Right now I'm 112th and Wabash. Just, um...just pull up at Auto Zone. I'm finna come back that way right now."

c. At approximately 3:15 p.m. (TP1, Session 46887), C WARE, who was using Target Phone 1, had a recorded phone conversation with an unknown male, who was using the phone number 773-***-0375. During this call, the unknown male stated: "I'm over here at the trap." C WARE stated: "Man I've been calling your phone four times, I'm at the warehouse. How many you want? How many?" The unknown male responded: "Six [units of narcotics]. I'll be there in a minute, at the warehouse."

d. At approximately 5:08 p.m. (TP1, Session 46944), WILLIAMS, who was using Target Phone 1, had a recorded phone conversation with an unknown

male, who was using the phone number 708-***-9877. During this call, the unknown male stated, “I’m on 117th and State.” WILLIAMS responded, “Oh you on State—you at the—shit, I just got the phone [I just got Target Phone 1 from C WARE] so you gon’ have to give me at least 5 minutes bro. Be outside.”

e. At approximately 5:13 p.m. (TP1, Session 46950), WILLIAMS, who was using Target Phone 1, had a recorded phone conversation with an unknown male, who was using the phone number 312-***-7773. During this call, the unknown male stated: “I need C [cocaine].” WILLIAMS asked: “where are you at?” and the unknown male responded: “At the crib.” WILLIAMS asked: “On 114th?” and the unknown male responded: “Yes.” WILLIAMS then said: “I’m coming that way now for 120th I pull up on you, I got you.”

f. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted calls and text message described above and below, I believe that in the above calls, C WARE was using Target Phone 1 to distribute narcotics, and that sometime between approximately 3:15 p.m. and 5:08 p.m., C WARE passed Target Phone 1 to WILLIAMS so that WILLIAMS could use Target Phone 1 to distribute narcotics.

D. On July 8, 2022, KEVIN WARE Arranges for RICKY WILLIAMS to Use Target Phone 1 to Distribute Narcotics After BRANDAN ALLEN Finishes Using Target Phone 1 to Distribute Narcotics

139. As discussed below, on or about the afternoon of July 8, 2022, while BRANDAN ALLEN was working a narcotics distribution shift on Target Phone 1, K

WARE sent ALLEN a phone number for WILLIAMS, so that ALLEN could get in touch with WILLIAMS and give Target Phone 1 to WILLIAMS for the next narcotics distribution shift. Later that day, WILLIAMS began using Target Phone 1 to distribute narcotics.

140. Specifically, on or about July 8, 2022, at approximately 2:50 p.m. (TP2, Session 2895), K WARE, who was using Target Phone 2, had a phone conversation with ALLEN, who was using phone number 773-***-1626 (ALLEN Phone 1).²⁶ During this call, ALLEN stated, “Just send me his [phone] number. I’m finna drop this motherfucker [Target Phone 1] off to him then.” K WARE responded, “You have to go over to D crib and get something [narcotics] from over there?” ALLEN said, “Yeah. I only grabbed like . . . I got one [unit of narcotics] left. I grabbed two [units of narcotics] from him, I only got one [unit of narcotics] left, though.” K WARE responded, “Alright, I’m finna send you Buddy Love [WILLIAMS] number.”

141. Roughly 27 minutes later, at approximately 3:17 p.m. (TP2, Session 2897), K WARE, who was using Target Phone 2, sent a text message to ALLEN, who was using ALLEN Phone 1, that read: “Buddy Luv 11-9 Egg =1 773-503-0645.”

142. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved

²⁶ ALLEN has been identified as the user of ALLEN PHONE 1 as follows: at approximately 1:40 p.m. on July 8, 2022, law enforcement performed a traffic stop on a vehicle driven by ALLEN. During the traffic stop, which was audio and video recorded, ALLEN self-identified to law enforcement. Law enforcement also compared the voice heard on ALLEN PHONE 1 on the July 8, 2022 described in this paragraph to ALLEN’s voice heard on the recorded traffic stop and confirmed that it was ALLEN’s voice.

in the investigation, and the content and context of the intercepted calls and text message described above and below, I believe that (1) on July 8, 2022, ALLEN was using Target Phone 1 to distribute narcotics to customers; (2) K WARE was checking in on how much narcotics supply ALLEN had left; and (3) K WARE texted ALLEN the phone number for WILLIAMS so that ALLEN could coordinate with WILLIAMS to deliver Target Phone 1 to WILLIAMS, who would then distribute narcotics using Target Phone 1 during the next shift. Based on intercepted communications over Target Phone 1 around the time of this call, I believe that ALLEN was using Target Phone 1 to distribute narcotics to customers and that ALLEN was preparing to provide Target Phone 1 to WILLIAMS for the next narcotics distribution shift. For example:

a. At approximately 3:20 p.m. (TP1, Session 49294), ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using the phone number 708-***-7647. During this call, ALLEN said, “Okay Felicia, shit, give me a little second, Felicia, we switchin’ over [I am about to give Target Phone 1 to someone else].” The unknown individual responded, “Hey, you got some hard [crack cocaine]?” ALLEN then stated, “Uh, when we switch over [when the next shift starts] we will.”

b. At approximately 3:49 p.m., ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using the phone number 773-***-0845. During this call, the unknown individual stated, “Yeah, Walt, you got both of ‘em [types of narcotics].” ALLEN responded, “I can get

soft [powder cocaine or heroin] right now.” The unknown individual said, “Give me 3 soft [3 units of powder cocaine or heroin].” ALLEN asked, “3 of ’em?” and the unknown individual replied, “yes.” ALLEN then said, “Come on outside. Come on to the back.”

c. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted calls and text message described above and below, I believe that during the above calls, ALLEN was selling powder narcotics to customers and that, when a customer requested “hard” [crack cocaine], ALLEN indicated that he did not have any, but that the next shift worker [WILLIAMS] would have it.

143. As ALLEN was finishing his narcotics distribution shift, K WARE communicated with WILLIAMS to see if WILLIAMS had received Target Phone 1 from ALLEN. In particular:

a. At approximately 3:42 p.m. (TP2, Session 2902), K WARE, who was using Target Phone 2, had a recorded phone conversation with WILLIAMS, who was using phone number 773-***-0645 (“WILLIAMS Phone 2”).²⁷ During this call, K WARE asked WILLIAMS: “Hey he [ALLEN] give you the phone [Target Phone 1]?... What’s his name?” WILLIAMS responded: “Who? Ride [B Ride, or ALLEN]?” K WARE responded: “Yeah...A’ight, he finna go ahead and give you that phone [ALLEN

²⁷ WILLIAMS has been identified as the user of WILLIAMS Phone 2 during this call and others described in this affidavit as follows: as described in this affidavit, WILLIAMS voice has been captured on intercepted communications over Target Phone 1. Law enforcement has compared WILLIAMS voice recorded on Target Phone 1 and compared it to the voice heard on WILLIAMS Phone 1 and confirmed that it is WILLIAMS’ voice.

is going to give Target Phone 1 to WILLIAMS].” WILLIAMS asked: “What-what’s his number, G?...’cause I [stutters] somebody was calling me.” K WARE asked: “Did it start with 773-620?”

b. Based on my training, experience ,and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls and text message described above and below, I believe that (1) K WARE was asking WILLIAMS whether ALLEN had given Target Phone 1 to WILLIAMS, and (2) WILLIAMS indicated that someone using a number starting with 773-620 (the first 6 digits of ALLEN Phone 1, which ALLEN was using to communicate with K WARE) had been calling him.

144. Based on intercepted calls over Target Phone 1 around the time of this call, I believe that (1) ALLEN, who was using Target Phone 1, was informing customers that WILLIAMS was about to start the next narcotics distribution shift; and (2) WILLIAMS then began using Target Phone 1 to distribute narcotics to customers. For example:

a. At approximately 4:14 p.m. (TP1, Session 49429), ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using telephone number 708-***-2856. During that call, ALLEN stated, “I’m still waiting on Buddy [WILLIAMS] to...Buddy to come grab this [Target Phone 1] man...I’m finna call him right now.”

b. At approximately 4:39 p.m. (TP1, Session 49467), ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using the telephone number 773-***-4230. During this call, ALLEN said, “call back in 10-15 minutes...We switching over, bro [we are about to change shifts].”

c. At approximately 5:30 p.m. (TP1, Session 49547), WILLIAMS, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using telephone number 773-***-6627. During this call, WILLIAMS stated, “Yo. Where, where you at, man?” The unknown individual stated, “I’m on 111th and Racine. I’mma meet you on Halsted where I always meet you at...I’m on my way walking up there no...I got your money [money for narcotics]...We want, we want four of ’em [four units of narcotics].” WILLIAMS responded, “Yeah.”

d. At approximately 6:30 p.m. (TP1, Session 49822), WILLIAMS, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using the phone number 815-***-7595. During this call, WILLIAMS said, “A’ight. Give me like ten minutes.” The unknown individual responded, “A’right. You got both [types of narcotics]?” WILLIAMS said, “Yeah.”

e. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls and text described above, I believe that WILLIAMS obtained Target Phone 1 from ALLEN and that WILLIAMS used Target Phone 1 to distribute narcotics to customers.

E. On or About July 16, 2022, BRANDAN ALLEN Distributes Narcotics After ERNEST ROWLETTE and Communicates with KEVIN WARE About ALLEN's Use of Target Phone 1 and Narcotics Supply

145. As discussed below, on or about the morning of July 16, 2022, ROWLETTE completed a narcotics distribution shift using Target Phone 1 and gave the phone to ALLEN. ALLEN then arranged narcotics transactions using Target Phone 1 and communicated with K WARE about his use of Target Phone 1 and his narcotics supply during the shift.

146. More specifically, during the morning of on or about July 16, 2022, ROWLETTE, using Target Phone 1, told a customer that the DTO was about to do a shift change. In particular:

a. On or about July 16, 2022, at approximately 7:38 a.m. (TP1, Session 58305), ROWLETTE, who was using Target Phone 1, had a phone conversation with an unknown male, who was using phone number 708-***-3223. During this call, ROWLETTE said, "We switching over. I'm giving him [ALLEN] the phone [Target Phone 1] right now. He's gonna call you."

b. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above and below, I believe that in the above call, ROWLETTE was telling a narcotics customer that the DTO was about to conduct a shift change and that ROWLETTE would be giving Target Phone 1 to ALLEN to distribute narcotics to customers.

147. During subsequent recorded calls, ALLEN, who was using Target Phone 1, spoke with narcotics customers about meeting with the customers to distribute narcotics. For example:

a. At approximately 10:04 a.m. (TP1, Session 58453), ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using phone number 708-546-8512. During that call, ALLEN stated: “Yeah, turn down the block. I’m on the block, uh, [U/I] off the track...I’m on the block facing...facing west.” The unknown individual responded, “A’ight, bet. A’ight. Hey, I’m getting six [units of narcotics]. Give me six.” ALLEN responded, “A’right, a’right.”

b. At approximately 10:36 a.m. (TP1, Session 58494), ALLEN, who was using Target Phone 1, had a recorded phone conversation with an unknown individual, who was using phone number 773-***-5111. During the call, the unknown individual stated, “So, you’ll come inside the house, you said?” ALLEN responded, “Yeah, I’mma have to.” The unknown individual asked, “You got any powder [powder cocaine] also?” ALLEN stated, “Yeah.” The unknown individual then said, “Let me get one and one [one unit of each type of narcotic].” ALLEN responded, “Okay, okay...I’ll call you when I get there.”

c. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above

and below, I believe that ALLEN obtained Target Phone 1 from ROWLETTE and that during the above calls, ALLEN used Target Phone 1 to distribute narcotics.

148. During ALLEN's narcotics distribution shift, K WARE checked on the status of Target Phone 1 and ALLEN's narcotics supply. In particular:

a. At approximately 3:13 p.m. (TP2, Session 4674), K WARE, who was using Target Phone 2, had a recorded phone conversation with ALLEN, who was using ALLEN Phone 1. During this call, K WARE asked, "You still got the phone [Target Phone 1]?" ALLEN responded, "Yeah." K WARE then asked: "What you got left [what quantity of narcotics do you have]?" ALLEN responded, "Uh, I think there's two or three [units of narcotics] left in there."

b. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above, I believe that during the above call, K WARE was asking whether ALLEN was selling narcotics to customers using Target Phone 1. When ALLEN confirmed that he was using Target Phone 1, K WARE asked what quantity of narcotics ALLEN had left, and ALLEN explained that he had two or three units of narcotics remaining.

F. In or around May of 2022, LEROY PRESLEY Ceases Using Target Phone 1 to Distribute Narcotics for the DTO Before Renewing his Use of Target Phone 1 to Distribute Narcotics for the DTO in or Around July 2022.

149. As described above, LEROY PRESLEY was a narcotics distribution shift worker for the DTO who used Target Phone 1 to distribute narcotics to customers from in or around February 2022 to May 2022. Based on intercepted communications,

it appears that PRESLEY ceased using Target Phone 1 to distribute narcotics in early May 2022.

150. On or about July 15, 2022, at approximately 5:21 p.m. (TP2, Session 4466), PRESLEY, using telephone number (312) ***-3966 (PRESLEY Phone 1)²⁸, sent a text message to K WARE, who was using Target Phone 2, and said “Hustle Game I’m ready to come back to work [start distributing narcotics again for the DTO].” The next day, July 16, 2022, at approximately 2:12 p.m. (TP2, Session 4649), K WARE texted back, “Its on you bro” and “I’m waiting on you.” Three days later, on or about July 19, 2022, at approximately 12:56 a.m. (TP2, Session 5318), K WARE texted PRESLEY, on PRESLEY Phone 1, and said, “Its crazy how you texted me to start back [distributing narcotics] but when it called there wasn’t an answer nor a text back.”

151. According to intercepted communications over Target Phone 2, K WARE and PRESLEY resumed communicating on or around July 21, 2022. For example, on or about July 21, 2022, at approximately 4:24 p.m. (TP2, Session 5986), K WARE and PRESLEY had the below recorded conversation:

K WARE: Why’d you go to what’s a name crib?
PRESLEY: Go to who crib?
K WARE: Dude on 108th and Emerald and old girl on 106th.
PRESLEY: On 108th and Emerald?

²⁸ PRESLEY has been identified as the user of PRESLEY Phone 1 as follows: as described in this affidavit, law enforcement intercepted and recorded communications in which PRESLEY was using Target Phone 1 to sell narcotics. Law enforcement also intercepted voice communications between PRESLEY Phone 1 and KEVIN WARE, using Target Phone 2. Law enforcement compared the voice heard on PRESLEY Phone 1 to PRESLEY’s voice intercepted on Target Phone 1 and confirmed that the user of PRESLEY Phone 1 is PRESLEY.

K WARE: Man! Listen, bro. This me talking to you like a man. I'm asking why did you go to old girl crib? Okay. Let's just say 106th.

PRESLEY: [U/I]

K WARE: Old girl on 106th place, right off Wentworth. What you tell her today?

PRESLEY: What, today? I ain't tell [U/I].

K WARE: Today, yesterday . . . hey, well, get up with me tomorrow. We'll go there and we'll see. If it ain't you, it ain't you. If it's you, then we'll talk.

PRESLEY: Alright, okay.

152. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted calls described above, I believe that during the above call, K WARE was upset with PRESLEY for servicing a particular narcotics customer who lived on West 106th Street and S. Wentworth Street, in Chicago.

G. KEVIN WARE Discusses the Use of Target Phone 1 for Purposes of Narcotics Distribution with Members of the DTO on Other Occasions

153. As described further below, at various points throughout the conspiracy, K WARE similarly communicated with members of the DTO regarding the use of Target Phone 1, in particular, the passing of the Target Phone 1 from one shift worker to another and the amount of narcotics each shift worker had.

154. For example, on or about July 19, 2022, at approximately 10:36 p.m. (TP2, Session 5613), K WARE who was using Target Phone 2, had a recorded phone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During this call, ROWLETTE said, "I grabbed the line [Target Phone 1] from Buddy

[WILLIAMS]. Where you at?" K WARE asked, "How many [units of narcotics] he leave you?" ROWLETTE responded, "Two [units of narcotics]." K WARE stated, "Alright." ROWLETTE then said, "You know, two [units of narcotics] will hold me mostly, almost through the night, but... like last night, I had just grabbed the extra one [unit of narcotics] from Guru [C WARE] and that was just enough. Yeah, but I got a deuce [U/I]." K WARE asked, "So, Buddy gave you two and Guru gave you one?" ROWLETTE stated, "Yeah...And remember I gave old girl the four bags [of narcotics] for the two for 15?" K WARE said, "Yeah." ROWLETTE then stated, "In that stack of money, right now, it's 180, so what you want it to be?" K WARE stated, "Uh...30...It should just be missing 10 dollars. So, it should be 190...Where you at?" ROWLETTE said, "I'm hitting Elaine [a narcotics customer] and I'm finna come back that way." K WARE stated, "Alright. Meet me by the trap." ROWLETTE responded, "Alright, I got you."

155. On or about September 11, 2022, at approximately 2:42 p.m. (TP2, Session 9382), K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE, who was using C WARE Phone 1. During this call, C WARE asked, "Who supposed to get the line [Target Phone 1]?" K WARE stated: "Oh, fuck. Damn. Could you [U/I] grab it? [Target Phone 1]" C WARE stated: "Yeah. I'll grab it...Where the phone [Target Phone 1] at?" K WARE stated: "B-Ride's [ALLEN] got it." C WARE responded, "B-Ride right here."

156. Roughly one minute later, at approximately 2:43 p.m. (TP2, Session 9383), K WARE, who was using Target Phone 2, had a recorded telephone

conversation with ALLEN, who was using ALLEN Phone 1. During this call, ALLEN said, “Ain’t nothing going on right now. Gonna give the phone [Target Phone 1] to Guru.” K WARE responded, “A’ight. You ain’t got nothing [narcotics] left.” ALLEN said, “You know I don’t.” K WARE responded, “A’ight.”

157. On or about September 30, 2022, at approximately 3:22 p.m. (TP2, Session 24220), K WARE, who was using Target Phone 2, had a recorded telephone conversation with WILLIAMS, who was using WILLIAMS Phone 2. During this call, K WARE asked: “You talk with B-Ride [ALLEN]?” WILLIAMS responded, “Yeah.” K WARE asked, “Oh, he already gave you the phone [Target Phone 1]?” WILLIAMS replied, “Yeah, I got a two [an order for two units of narcotics].” K WARE asked, “He gave you two [units of narcotics]?” WILLIAMS responded: “Yeah.” K WARE then said, “A’ight. I’ll meet you in one minute.” WILLIAMS responded, “A’ight.”

158. On or about October 1, 2022, at approximately 3:44 p.m. (TP2, Session 25083), K WARE, who was using Target Phone 2, had a recorded telephone conversation with BROOKS, who was using BROOKS Phone 1. During this call, K WARE asked, “You ain’t get the phone [Target Phone 1] yet?” BROOKS replied, “He pu...said, he pulling up now he said.” K WARE said, “What, what about uh... Did Boo [ROWLETTE] brought you the car?” BROOKS replied, “Yeah, yeah, yeah, yeah. I’m in front of B-Ride crib waitin’ on him to pull up.” K WARE said, “Oh all right.”

IV. DTO Members Use a Residence at 11749 S. Union Ave. as a Stash House Location to Store Narcotics

159. As discussed below, the DTO used a residence located at 11749 S. Union Ave., which the DTO members referred to as the “trap,” to store narcotics and conduct

narcotics transactions. On or about July 1, 2022, Chicago Police Officers seized firearms and narcotics from the stash house and members of the DTO discussed the seizure with K WARE during intercepted communications. After the seizure from the stash house, the DTO continued to use the stash house to store narcotics and conduct narcotics transactions.

A. The DTO Refers to 11749 S. Union Ave. as the “Trap”

a. On or about May 9, 2022, at approximately 9:09 p.m. (TP1, Session 21650), an unknown male, referred to in other intercepted communications as “Marcus,” using telephone number 773-***-6982, had a recorded conversation with BROOKS, who was using Target Phone 1. During the call, Marcus said, “Yeah. Hey, hey, man. Uh, this is Marcus, you know, from over on Princeton, but I’m over here on Halsted. Uh, what’s the address right there? At the house?” BROOKS replied, “Oh ...one...one...one...one...one...s...one...one...one...17...49, South Union [11749 S. Union Ave., Chicago, Illinois].” “Marcus” said, “Oh yeah, that’s the one.” BROOKS said, “The trap [stash house], yeah.” Later in the conversation, BROOKS said, “That’s the trap house where we get the coke [cocaine] and everything else [other narcotics].” “Marcus” said, “Yeah, I know.” BROOKS responded, “Alright.” “Marcus” said, “I’m gonna get some more [U/I] shit. A’ight bet.”

160. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, the July 1, 2022 seizure at 11749 S. Union Ave. described below, the intercepted communication

above describing 11749 S. Union Ave. as the “trap,” and additional intercepted calls discussed throughout this affidavit, I believe that the DTO used the residence at 11749 S. Union Ave. as a stash house to store narcotics for the DTO.

B. On July 1, 2022, Law Enforcement Seizes Guns and Narcotics from Individuals at 11749 S. Union Ave.

161. On or about July 1, 2022, at approximately 1:08 p.m. (TP2, Session 1095), K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE, who was using C WARE Phone 1. C WARE asked K WARE, “What you want to talk to Ugly Lord? Here he go right here. Here you go...” A second unknown male is then heard saying on the phone, “Yo.” K WARE asked, “What you wanted Ugly Lord?” “Ugly Lord” responded, “Two and one [units of narcotics].” K WARE responded, “Aight.” “Ugly Lord” then said, “what you want me to do?” K WARE answered, “Lemme speak back to him [C WARE].” “Ugly Lord” said, “a’ight hold on.” C WARE answered the phone again and said, “What up G?” K WARE said, “Give them a two and one [quantity of narcotics] Guru” to which C WARE asked, “Two and one what? Two what? D [heroin]?” K WARE responded, “the one that he’s talking ‘bout.” C WARE responded, “oh, two C’s [2 units of cocaine] and a D [one unit of heroin] a’ight.”

162. Based on my training, experience, and the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, I believe that during this call, C WARE and K WARE were having a telephone conversation, and that C WARE passed his phone to an unknown individual with the nickname “Ugly Lord,” who told K WARE (using C

WARE's phone) that "Ugly Lord" wanted to buy cocaine and heroin from K WARE. K WARE then asked "Ugly Lord" to hand the phone back to C WARE, and explained to C WARE that "Ugly Lord" wanted "two and one." C WARE then confirmed with K WARE that "Ugly Lord" was to receive "two C's [baggies of cocaine] and one D [baggie of heroin]."

163. About seven hours later, at approximately 7:30 p.m., law enforcement was alerted via remote surveillance outside the stash house at 11749 S. Union Avenue that a group of individuals were observed outside of the 11749 S. Union residence displaying handguns and pointing them toward the street. Investigators alerted the Chicago Police Department ("CPD"). According to CPD reports, officers responded to the scene and recovered five guns, approximately 12.2 grams of a white chunky substance, approximately 408 grams of suspected marijuana, and arrested two individuals in connection with the incident.²⁹ According to Illinois State Police Crime Laboratory, the white chunky substance tested positive for cocaine.

C. Following the July 1, 2022 Seizure at 11749 S. Union Ave., Members of the DTO Discussed the Incident with KEVIN WARE

164. On or about July 1, 2022, less than one hour after the above-described seizure, at approximately 8:12 p.m. (TP2, Session 1220), C WARE, who was using C WARE Phone 1, had a recorded telephone conversation with K WARE, who was using Target Phone 2. During the call, the following conversation occurred:

K WARE: What up, Guru?
C WARE: Man, they just hit that bitch [the stash house], G.
K WARE: Hit what?

²⁹ None of the DTO members were arrested on July 1, 2022.

C WARE: The trap, boy!
 K WARE: Get the fuck outta here.
 C WARE: Soon as I walked out of that mo'fucka, I walk passed it [U/I] police came out the area and everything.
 K WARE: They in there?...Damn! I'm glad I just left! Damn! Damn. Get the...man it's a pipe [handgun] sittin' right there.
 C WARE: Oh I see it.
 K WARE: Bro, get the fuck outta here!
 C WARE: Boy, you left, I left. Soon as I got to the corner [U/I]. Soon as you pulled off they [police] came.
 K WARE: So, you walked back towards the trap?
 C WARE: Yeah, I left the key, I just walked all the way in there. I left the key in there.

165. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, the July 1, 2022 seizure at 11749 S. Union Ave. described above, and content and context of this intercepted communication, I believe that during this call, C WARE told K WARE that the police had just responded to the stash house located at 11749 S. Union Avenue. Furthermore, K WARE also told C WARE that he was glad he had just left the stash house because he left his gun there that would probably be found by police.

166. Roughly two hours after the seizure, at approximately 9:25 p.m. (TP2, Session 1245), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ALLEN, who was using ALLEN Phone 1. During the call, K WARE said, "B-Ride." ALLEN responded, "What up?" K WARE stated: "[U/I] hit the trap." ALLEN responded, "I know. I know. I know."

167. Roughly three hours after the seizure, at approximately 10:33 p.m. (TP2, Session 1265), K WARE, who was using Target Phone 2, had a recorded

telephone conversation with ALLEN, who was using ALLEN Phone 1. During this call, ALLEN said, “Yeah. Damn, so what the fuck... uh... So, you said they got seven poles [firearms] and only took [arrested] two niggas. That was a bogus...that was some bogus shit. What the fuck, they had no warrant.”

168. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, the July 1, 2022 seizure at 11749 S. Union Ave. described above, and content and context of the intercepted communications, I believe that during these calls, K WARE and ALLEN discussed how the police had just responded to the stash house located at 11749 S. Union Avenue, seized multiple firearms, and arrested two individuals.

D. The DTO Continues to Use 11749 S. Union Ave. as a Narcotics Stash House After the July 1, 2022 Seizure.

i. On or About September 15, 2022, CHRISTOPHER WARE Distributes 6.9 Grams of a Heroin, Fentanyl, and Fentanyl Analogue Mixture to Individual B Near the Stash House.

169. On or about September 15, 2022, C WARE sold approximately 6.9 grams of a heroin, fentanyl, and fentanyl analogue mixture to a customer near the stash house. When law enforcement attempted to stop the narcotics customer after the transaction, the customer threw the narcotics out the window of the car s/he was driving, and later called C WARE and made a second narcotics order. When C WARE received the second order, he called K WARE, who told C WARE that he could supply the narcotics for the second order after the first order went awry.

170. More specifically, and as described above, at approximately 11:32 a.m. (TP2, Session 12270), K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE, who was using C WARE Phone 1. K WARE and C WARE had the following conversation:

K WARE: I'm at the crib. What? You need or somethin'? [K WARE asking whether C WARE needed narcotics].

C WARE: Yep.

K WARE: I ain't go-man I been fuckin' wit' Lil' Hot all this morning.

C WARE: You ain't got shit with you?

K WARE: Man, I'm finna get it [narcotics] ready. It just need to be dumped out [the narcotics need to be mixed for distribution].

K WARE: A'ight, I'm finna get it together now.

171. According to law enforcement surveillance, at approximately 11:42 a.m., C WARE entered the Black Hyundai.

172. At approximately 12:01 p.m. (TP1, Session 78526), C WARE, who was using Target Phone 1, had a recorded telephone conversation with Individual B³⁰ who was using phone number 312-***-1984. During their call, the following conversation occurred:

Individual B: Yo where I can meet you at?

C WARE: How many [how much narcotics] you need?

Individual B : Uh, 12 [baggies] is \$90 – 8 is \$60, shit uh 20.

C WARE: A'ight, meet me by the trap bro.

Individual B : A'ight yeah 12 is \$90 and then 8 is \$60, that's 20.
Probably like 22-24 [baggies of narcotics].

³⁰ Individual B has been identified in this call and other calls referenced in this affidavit as follows: as described below, law enforcement performed a traffic stop of the vehicle Individual B was driving on or about September 15, 2022 (the same day as the call this footnote refers to). The stop was audio and video recorded with BWC. During the traffic stop, Individual B identified himself by presenting his driver's license and identifying himself as [Individual B]. Law enforcement compared Individual B's voice heard on the recorded BWC video with the voice of the user of telephone number 312-***-1984 and confirmed it was Individual B.

C WARE: A'ight, a'ight.
Individual B : Yeah

173. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communications above, I believe that during the above conversations, K WARE and C WARE were discussing on their personal phones how they were preparing narcotics for distribution to customers, then later, C WARE, using Target Phone 1, discussed selling 22-24 baggies of narcotics to Individual B.

174. According to law enforcement surveillance, at approximately 12:04 p.m., a black Volkswagen Touareg with Illinois temporary registration number 880AA538 (the "Touareg")³¹ parked just south of the narcotics trap house located 11749 South Union Avenue.

175. At approximately 12:16 p.m. (TP1, Session 78553), C WARE, who was using Target Phone 1, had a recorded telephone conversation with Individual B, who was using phone number 312-***-1984. Due to technical issues, the only part of the conversation that was recorded was Individual B saying "A'ight."

176. According to law enforcement surveillance and video recordings:

a. At approximately 12:29 p.m., Individual B drove the Touareg from Union Street to 117th Place and parked approximately in front of 720 W. 117th Place.

³¹ According to Illinois Secretary of State vehicle registration records, the Touareg is registered to Individual B, with an address of *** ***, Kankakee, Illinois.

b. At approximately 12:30 p.m., C WARE, driving the Black Hyundai Santa Fe (first described at paragraph 42, above) stopped on 117th Place at Union Street. C WARE then conducted a suspected hand to hand narcotics transaction with an unidentified female that arrived from a silver sedan that was stopped on Union Street. C WARE then pulled the Black Hyundai next to Individual B's Touareg. Individual B exited the Touareg and approached the Black Hyundai.

c. At approximately 12:31 p.m., a Nissan Altima pulled up next to the Black Hyundai. Once Individual B was finished at the window of the Black Hyundai, Individual B approached the passenger window of the Altima. The Black Hyundai then departed the area.

d. At approximately 12:32 p.m., Individual B walked away from the Nissan Altima, entered the Touareg, and departed westbound on 117th Place.

177. Law enforcement then conducted a stop of the Touareg. Before the Touareg pulled over, law enforcement observed Individual B throw a bag out of the driver's side window of the Touareg. Law enforcement recovered the bag that Individual B had thrown. According to the DEA Laboratory, the contents of the baggie tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 6.9 grams. After the traffic stop, law enforcement did not arrest Individual B and allowed Individual B to drive away from the area.

178. At approximately 12:50 p.m., law enforcement observed the Touareg pull back onto S Morgan Street from 119th. The Touareg stopped directly in front of

the area where Individual B had tossed the baggie. Individual B then exited the Touareg and walked around the immediate area looking at the ground and appeared to be searching for something. Individual B eventually returned to the Touareg and departed north on S. Morgan Street.

179. At approximately 12:56 p.m., law enforcement observed the Touareg again pull onto S. Morgan Street, from 119th, and drive slowly north on S. Morgan Street. The Touareg then departed the area.

180. At approximately 12:57 p.m. (TP1, Session 78597), Individual B, who was using telephone number 312-***-1984 called C WARE, who was using Target Phone 1, and had the following conversation:

Individual B: Yo, yeah where can I meet you at? [to purchase narcotics]
C WARE: I'm at Dunkin Donuts right now why, what's up?
Individual B: I need 22 [bags of narcotics]
C WARE: You need 22 more? [additional narcotics in addition to the narcotics C WARE just sold to Individual B]
Individual B: Yeah
C WARE: A'ight, meet me at the liquor store on 123rd and Halsted.
Individual B: 123rd and Halsted, a'right.
C WARE: Yeah.

181. Roughly four minutes later, at approximately 1:01 p.m. (TP2, Session 12319), C WARE, who was using C WARE Phone 1, called K WARE, who was using Target Phone 2, and they had the following conversation:

C WARE: You got something different?
K WARE: No. I just come back from dropping what's-his-name off. I'm on my way back, soon as I get back, I'm finna call you.
C WARE: Ah, shit, Drew [PH] waiting on 22 [Individual B wants an additional 22 units of narcotics].
K WARE: He waiting on 22 [U/I]?

C WARE: Drew, he come back for another 22.
K WARE: A'ight. I got you. I'm a run back to the crib right now. Give me like 10 minutes. I'll have his ready [K WARE will get the narcotics ready for C WARE to provide to Individual B.
C WARE: A'ight.

182. At approximately 1:03 p.m., law enforcement observed the Touareg pull into the parking lot of the Way Low Wine Spirits liquor store located at 12310 S. Halsted Street, Calumet Park.

183. At approximately 1:27 p.m. (TP1, Session 78635), Individual B, who was using telephone number 312-***-1984 called C WARE, who was using Target Phone 1. Due to technical issues the only part of the conversation that was recorded was Individual B saying "A'ight."

184. At approximately 1:30 p.m., law enforcement observed C WARE pull into the parking lot in the Black Hyundai, and park next to Individual B's Touareg. Both the Touareg and Black Hyundai then departed the parking lot south on Halsted, and surveillance was terminated.

185. The next morning, on or about September 16, 2022, law enforcement, using a pole camera, observed C WARE on the porch of the stash house at 11749 South Union counting money and holding a firearm. Still images from the pole cam appear below:



ii. Members of the DTO Use the Narcotics Stash House on Other Occasions after July 1, 2022

186. As discussed below, members of the DTO continued to use the narcotics stash house, or the “trap,” after July 1, 2022 and communicated with KEVIN WARE about it.

187. For example, on or about July 10, 2022, at approximately 10:06 a.m. (TP1, Session 52039), ALLEN, who was using Target Phone 1, had a recorded telephone conversation with an unknown male using telephone number 773-***-3711, who had previously identified himself in intercepted communications as “Nate.” During the call, Nate said, “I’m on my way to the trap man. Can I get with you?” ALLEN replied, “Give me a lil’ second bro. What you gettin’ from the trap?” Nate responded, “The hard [crack cocaine].” ALLEN said, “No you don’t gotta do that.” Nate said, “Oh okay you got-[stutters]-I’ll be at the crib though.” ALLEN asked, “How many hards you wanted?” Nate responded, “one and two [quantities of narcotics].” ALLEN said, “A’ight I don’t even uh got no soft [powder cocaine or heroin] right now.

I'ma call you when I get right [ALLEN tells Nate that he has no powder cocaine or heroin but will call Nate when he obtains the narcotics]." Nate asked, "Y'all ain't got no diesel [heroin]?" ALLEN replied, "No not right now bro. I'ma call you when I get right [obtain the narcotics] bro." Nate responded: "Oh man. I'm in a hurt, jack, shit. I'ma call B8 man." ALLEN said, "A'ight."

188. At approximately 10:09 p.m. (TP2, Session 3384) K WARE, who was using Target Phone 2, had a recorded telephone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During the call, K WARE asked, "Oh, did you want to [U/I] what I gave you that last night?" ROWLETTE replied, "you say what?" K WARE stated, "they gave you them at the trap." ROWLETTE later asked: "What he, what he, what he give me at the trap [what kind of narcotics did ROWLETTE get at the trap]?" K WARE replied: "Some hard [crack cocaine]." ROWLETTE asked, "Oh, you talking about, uh, Guru [C WARE]?" K WARE responded, "Guru ain't give you non last night." ROWLETTE stated: "Yeah, Guru gave me—gave me one [unit of narcotics] last night."

189. On or about July 19, 2022, at approximately 3:28 p.m. (TP2, Session 5473), K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE, who was using C WARE Phone 1. During this call, K WARE said, "You made it by the trap." C WARE replied: "I'm at the trap. I'm waiting on Buddy [WILLIAMS]."

190. On or about September 11, 2022, at approximately 6:14 p.m., K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE,

who was using C WARE Phone 1. During the call, C WARE stated: “Hello?” K WARE replied: “I’m at the trap.” C WARE stated: “Get this dope [narcotics] brother.”

191. On or about September 27, 2022, at approximately 8:48 p.m. (TP2, Session 22116), K WARE, who was using Target Phone 2, had a recorded telephone conversation with WILLIAMS, who was using WILLIAMS Phone 2. During the call, WILLIAMS said, “I’m finna hit the trap.” K WARE asked, “you say come to the trap?” WILLIAMS replied, “no, I’m finna hit the...yeah, I’m finna go to the trap. You wanna come over there?” K WARE replied, “I’ll be over there.” WILLIAMS said, “A’ight.”

192. On or about October 5, 2022, at approximately 10:16 p.m. (TP2, Session 29891), K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE, who was using C WARE Phone 1. During the call, K WARE asked, “Where you at?” C WARE responded, “at the trap.” Later in the conversation, K WARE said, “I’m finna come to the trap.”

193. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and content and context of the intercepted communications, I believe that during the above calls, K WARE and other DTO members continued to discuss meeting at and conducting narcotics transaction at or with the assistance of the narcotics stash house located at 11749 S. Union Avenue.

V. DTO Members Discuss Street Level Narcotics Operations of the DTO with KEVIN WARE

194. As discussed below, intercepted communications over Target Phone 1 and Target Phone 2 reflect that members of the DTO discussed various aspects of the

DTO's narcotics operations with K WARE, including (1) their supply of narcotics, (2) the quality of the narcotics they sold; (3) their interactions with customers, and (4) their interactions with law enforcement.

A. DTO Members Discuss the Status of the DTO's Narcotics Supply with KEVIN WARE

i. On or About July 7 and October 4, 2022, KEVIN WARE and CHRISTOPHER WARE Discuss Narcotics Supply.

195. On or about July 7, 2022, at approximately 10:28 p.m. (TP2, Session 2779), C WARE, who was using C WARE Phone 1, had a recorded telephone conversation with K WARE, who was using Target Phone 2. During this call, K WARE asked, "Where you at, the trap?" C WARE responded, "Yeah. When you come out, bring me the C [cocaine] too." K WARE said, "Alright." C WARE then said, "cause I know what's a name working in a minute...B-Ride [ALLEN]. Tomorrow Friday."

196. On or about October 4, 2022, at approximately 6:45 p.m. (TP2, Session 27873), C WARE, who was using C WARE Phone 1, had a recorded telephone conversation with K WARE, who was using Target Phone 2. During this call, C WARE asked, "You went to the crib?" K WARE responded, "Yes." C WARE then said, "Come out and bring me some hard [crack cocaine]." K WARE responded, "A'ight, I got you."

197. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted calls above, I believe that during the July 7, 2022 call, C WARE told K WARE that he was at the trap and asked K WARE to bring some cocaine to provide to ALLEN, who would be

selling narcotics the following day. Further, I believe that during the October 4, 2022 call, C WARE asked K WARE to bring some crack cocaine to C WARE and K WARE confirmed that he would do so.

ii. On or About September 24 and 30, 2022, KEVIN WARE and DARRELL BROOKS Discuss Narcotics Supply.

198. On or about September 24, 2022, at approximately 11:54 a.m. (TP2, Session 19714), BROOKS, who was using BROOKS Phone 1, had a recorded telephone conversation with K WARE, who was using Target Phone 2. During this call, K WARE asked, “Why don’t you make sure you got the, did you ever do that other one [narcotics]?” BROOKS responded, “What’s that?” K WARE stated, “The hard [crack cocaine], man.” BROOKS responded, “Yeah, let me get up and bag that [the narcotics] up right now. And then [U/I] clean the table off. I’m finna get up right now. Right now and do it.” K WARE stated, “A’ight.”

199. On or about September 30, 2022, at approximately 11:13 a.m. (TP2, Session 23852), BROOKS, who was using BROOKS Phone 1, had a recorded telephone conversation with K WARE, who was using Target Phone 2. During this call, K WARE asked, “You got money for six [units of narcotics] of them that you did?” BROOKS responded, “Yeah, I got that nine [units of narcotics].” K WARE stated, “Then you got...look, then you got a 200, and a 250.” BROOKS said, “You said what? The 250 is for the C [cocaine]. I still...I...I sold some of that [narcotics], but once the three [units of narcotics] got done...I don’t know the price for that one. I wanna write it down.” WARE responded, “Uh...That’s 450.”

200. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted communications described above, I believe that during the September 24, 2022 call, K WARE asked BROOKS if BROOKS had a quantity of crack cocaine, and BROOKS confirmed that he had it and that he would prepare it for distribution to a customer. I further believe that during the September 30, 2022 call, BROOKS and K WARE discussed the price of narcotics, the sale of narcotics, and narcotics proceeds.

iii. On or About July 2 and 15, 2022, KEVIN WARE and BRANDAN ALLEN Discuss Narcotics Supply.

201. On or about July 2, 2022, at approximately 7:09 p.m. (TP2, Session 1532), ALLEN, who was using ALLEN Phone 1, had a phone conversation with K WARE who was using Target Phone 2. During this call, ALLEN stated, “I don’t got no more hard [crack cocaine].” K WARE responded, “Alright, bet. I’ll call you. I’m a go ahead and come out in.” ALLEN responded, “Alright.” K WARE asked, “Where you at?” ALLEN responded: “I’m at the crib right now.” K WARE then stated, “I’ll call you [U/I] come out.”

202. On or about July 15, 2022, at approximately 3:24 p.m. (TP2, Session 4429), ALLEN, who was using ALLEN Phone 1, had a recorded telephone conversation with K WARE who was using Target Phone 2. During this call, K WARE asked: “How you lookin’ on the hard [crack cocaine]? You still got some, right?”

ALLEN responded, "Yeah." K WARE then stated, "Ima bring you the other ones [narcotics] a little bit later." ALLEN said, "A'ight."

203. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted communications, I believe during the July 2, 2022 call, ALLEN told K WARE that ALLEN had run out of crack cocaine to sell, and K WARE coordinated with ALLEN to deliver additional narcotics to ALLEN. Further, I believe that during the July 15, 2022 call, K WARE asked ALLEN whether ALLEN had any crack cocaine to sell, and ALLEN confirmed that he did. K WARE then indicated that he was going to bring another type of narcotic to ALLEN for ALLEN to sell.

iv. On or About July 9 and 11, 2022, KEVIN WARE and RICKY WILLIAMS Discuss Narcotics Supply.

204. On or about July 9, 2022, at approximately 10:35 p.m. (TP2 Session 3211), WILLIAMS, who was using WILLIAMS Phone 2, had a recorded telephone conversation with K WARE, who was using Target Phone 2. During this call, K WARE asked: "Where you at? The trap?" WILLIAMS responded, "Yeah I'm finna leave I'm 'bout to go to Riverdale." K WARE later asked, "What you got left [how much narcotics do you have left]?" WILLIAMS responded, "I got...probably like two D's [two units of heroin] left, two jabs." K WARE said, "you probably missed a lot of people [customers] today."

205. On or about July 11, 2022, at approximately 10:52 p.m. (TP2, Session 3610), WILLIAMS, who was using WILLIAMS Phone 2, had a recorded telephone

conversation with K WARE, who was using Target Phone 2. During this call, K WARE asked: “Where you at? You in the trap?” WILLIAMS said, “Uh-uh.” K WARE asked, “What I was ’bout to say? You ain’t got none [narcotics] left?” WILLIAMS responded, “Yeah, yeah. I got it [the narcotics] in my hand now.” K WARE asked, “I’m saying what you got left?” WILLIAMS responded, “My last jab. I don’t know exactly how many, though.” K WARE stated, “Oh, just go ahead. Just call when you get through.”

206. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted communications, I believe that during the July 9, 2022 call, K WARE asked WILLIAMS how much narcotics WILLIAMS had, and WILLIAMS indicated that he had approximately 24-28 pre-packaged amounts of heroin left. Further, I believe that during the July 11, 2022 call, K WARE asked WILLIAMS how much narcotics WILLIAMS had, WILLIAMS indicated that he was not sure, and K WARE instructed WILLIAMS to call K WARE when WILLIAMS finished selling the narcotics.

v. On or About July 15 and 22, 2022, KEVIN WARE and ERNEST ROWLETTE Discuss Narcotics Supply.

207. As discussed below, on or about July 15 and 22, 2022, K WARE discussed narcotics supply with ROWLETTE. In particular, on those two dates, K WARE discussed ROWLETTE’s narcotics supply right before ROWLETTE started to distribute narcotics using Target Phone 1. Furthermore, on both occasions,

ROWLETTE had worked a narcotics distribution shift on the previous day and ROWLETTE reported to K WARE how much narcotics ROWLETTE had remaining.

208. More specifically, on about July 15, 2022, at approximately 10:46 p.m. (TP2, Session 4505), K WARE, who was using Target Phone 2, had a phone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During that call, ROWLETTE said, "Yeah, I'm at the trap." K WARE said, "I gave Guru the key...how many [how much narcotics] you got left from last night [the previous shift]?" ROWLETTE said, "It was three [units of narcotics] altogether, right?" K WARE stated, "It was four [units of narcotics], remember somebody gave you one and [U/I] three." ROWLETTE responded, "Right, that's what I was saying. I popped one off and it's three left."

209. As discussed above (TP1, Sessions 57017 and 57036), ROWLETTE began a shift and used Target Phone 1 to distribute narcotics on the evening of July 14, 2022. Shortly after the above July 15, 2022 call with K WARE, ROWLETTE began another shift and again distributed narcotics using Target Phone 1. Specifically:

a. On or about July 15, 2022, at approximately 11:13 p.m., (less than one half hour after the above call with K WARE) (TP1, Session 58113), ROWLETTE, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using phone number 773-***-2827. During the call, ROWLETTE said, "Yeah Ima call you when I get that way, I just got the line [Target Phone 1] and I'm taking the orders [for narcotics]...Ima call you when uh, when I'm pullin' up. I know who this is."

b. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted calls above, I believe that (1) on the evening of July 14, 2022, ROWLETTE worked a narcotics distribution shift using Target Phone 1; (2) on the evening of July 15, 2022, K WARE called ROWLETTE to determine the amount of narcotics ROWLETTE had remaining after ROWLETTE's July 14 narcotics distribution shift; and (3) shortly after ROWLETTE's July 15, 2022 call with K WARE regarding ROWLETTE's supply, ROWLETTE began another narcotics distribution shift using Target Phone 1.

210. On or about July 22, 2022, at approximately 10:31 p.m. (TP2, Session 6286), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During the call, K WARE asked, "You at the trap?" ROWLETTE replied: "Yeah." K WARE stated, "I'm pulling up. That's right, you got some left from last night, don't you [WARE is asking how much narcotics ROWLETTE has remaining from his narcotics distribution shift the prior evening]?" ROWLETTE replied, "Right, I got, uh...you gave me three [units of narcotics]." K WARE stated, "Right. You got one left from last night." ROWLETTE responded, "I got one I was doing and one left, one whole one." K WARE stated, "You might as well keep both of them." ROWLETTE said, "Damn. I wanted to give you this bread [money, or narcotics proceeds] while I'm here." K WARE said, "I know. I'm right here."

211. Based on the intercepted communications described above, I believe that on the evening prior to this call (July 21, 2022), ROWLETTE was working a narcotics distribution shift and using Target Phone 1. For further illustration:

a. On or about July 21, 2022, at approximately 11:25 p.m. (TP1, Session 63911), ROWLETTE, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using phone number 312-***-6398. During the call, ROWLETTE asked, “Okay, what you trying to do? Hello. What you tryin’ to do? Hello, hello?” The individual said, “Two hard [two units of crack cocaine].” ROWLETTE stated, “A’right I’ll be there in a couple minutes.” The individual responded, “A’right, I’m on the porch.”

b. About four minutes later, at approximately 11:29 p.m. (TP1, Session 63914), ROWLETTE, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using telephone number 312-***-1119. During the call, ROWLETTE said, “This boo. We switched lines [ROWLETTE just started a shift on Target Phone 1].” The individual asked, “Huh?” ROWLETTE responded, “This Boo I’m finna slide on you.” The individual stated, “A’right.” ROWLETTE said, “A’right, be ready when I call you” and the individual responded, “A’right I am.”

212. Shortly after ROWLETTE’s July 22, 2022 call with K WARE, ROWLETTE started another narcotics distribution shift using Target Phone 1. In particular, on or about July 22, 2022, at approximately 11:13 p.m. (less than 45 minutes after his above call with WARE) (TP1, Session 65397), ROWLETTE, who

was using Target Phone 1, had a recorded telephone conversation with an individual who previously identified herself on intercepted communications as “Rita,” who was using telephone number 872-***-2376. During the call, ROWLETTE said, “This is Boo, Rita I just got, I just got the phone [just started a shift on Target Phone 1]. I gotchu.” “Rita” said, “I’m gonna need both [crack cocaine and heroin].” ROWLETTE asked, “You need both?” Rita responded, “Hard and a soft.” ROWLETTE said, “A’right, gucci, gucci, I got you.”

213. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted calls above, I believe that (1) on the evening of July 21, 2022, ROWLETTE distributed narcotics using Target Phone 1; (2) on the evening of July 22, 2022, K WARE called ROWLETTE to determine how much narcotics ROWLETTE had remaining after ROWLETTE’s July 21 narcotics distribution shift; and (3) shortly after his July 22, 2022 call with K WARE regarding his narcotics supply, ROWLETTE began another narcotics distribution shift using Target Phone 1.

B. DTO Members and KEVIN WARE Discuss the Quality of Narcotics Sold and Interactions with Narcotics Customers.

214. Throughout the conspiracy, members of the DTO discussed with KEVIN WARE the quality and potency of the narcotics they were selling and best practices to interact with narcotics customers, including what types of deals to offer to customers. Intercepted communications combined with law enforcement seizures reveal that the DTO conspired to distribute narcotics of a certain type and quality.

i. KEVIN WARE Discussed His “Brand” of Narcotics with an Unknown Individual.

215. On or about June 29, 2022, at approximately 11:39 p.m. (TP2, Session 646), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During this call, ROWLETTE said, “You just called me.” K WARE said, “Hold on,” then engaged in a side conversation with an unidentified individual, during which K WARE discussed the quality of the narcotics he was selling, and the fact that the narcotics were sold with a Superman logo as the narcotics’ brand. Specifically:

a. K WARE said, “Man, listen. I done sold dope my [U/I]. Them niggas...I called them niggas on Perry. Once they said, look...ask them. They say, ‘man, this dope ain’t none’...man, this shit, ‘the dope ain’t right.’” The unidentified individual then responded, “This is, this is your name. This your legacy. Think of this as a brand. Foo, when that shit is a brand you ‘posed to live it like it’s a brand. Nigga, we ain’t goin’ off just because a nigga name!” K WARE replied, “You see what they say. Hey. Hey, Superman ain’t hittin’ right [narcotics sold by WARE’s DTO werre not strong enough], Superman go right back in the dungeon and we [U/I] that shit.”

b. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the intercepted call, I believe that (1) K WARE was discussing customer complaints about the narcotics in the Superman-marked baggies; and (2) the unidentified individual was telling K WARE that the Superman logo narcotics are the “brand” of K WARE’s DTO.

ii. **KEVIN WARE and ERNEST ROWLETTE Discuss the Quality of the DTO's Narcotics and the DTO's "Pass Out" (Distribution of Free Narcotics).**

216. In July 2022, K WARE discussed the quality of the DTO's narcotics with ROWLETTE, including how strong the narcotics were (how "hard" they "hit"), and how the DTO's narcotics, which caused customers to line up ("motherfuckers be getting' in line get in line" because WARE's narcotics are the "best shit around") were superior in quality to the narcotics sold by others. In particular:

a. On or about July 5, 2022, at approximately 10:23 p.m. (TP2, Session 2345), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During the call, K WARE asked, "How was that shit [U/I] from Whitey? How was it [how was the quality of narcotics from Whitey]?" ROWLETTE replied, "Huh? Oh, the shit he got from Whitey? Eh...man, a waste of money. A waste of motherfuckin' money." K WARE later asked, "I'm sayin', what did Will say?" ROWLETTE replied, "He said, I guess he...he said it was a'ight [the quality of the narcotics was alright according to "Will"]. I'm like, 'man, that shit ain't shit.' Even when it's raw, nah that shit ain't nothing [ROWLETTE did not like the quality of the narcotics, even in raw form]. Your shit hittin' way harder than that [K WARE's narcotics are stronger]...your shit motherfuckin' hit more and it holds you. You know what I'm sayin'?...it was like a quarter gram of raw [quarter of a gram of narcotics] and he split it with me. So, a half of a quarter gram of raw ain't nowhere near better than one of your uh...bags. That's

why, man, that's why a lot of motherfuckers be getting in line. Cause that shit is quality. The best shit around."

217. Later in July of 2022, K WARE discussed the quality of the DTO's narcotics with ROWLETTE, who indicated that customers were not complaining ("ain't been no complaints") and instructed ROWLETTE to participate in a "pass out" with ALLEN. Based on my training and experience, I know that "pass out" refers to a distribution of free narcotics to entice future customers to purchase narcotics from the DTO. In particular:

a. On or about July 16, 2022, at approximately 7:44 a.m. (TP2, Session 4548), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ROWLETTE, who was using ROWLETTE Phone 1. The following conversation occurred:

ROWLETTE: Yeah, B-Ride [ALLEN] just got the line [Target Phone 1], but what was crazy is why nobody callin'. Right before B-Ride called me, when I tell you about 20 people was callin' at the same time. I'm like, 'damn.' So, yeah, he got the line. I ain't get a chance to...You know, I only got like seven [units of narcotics] left.

K WARE: Did you give B-Ride that whole one [unit of narcotics]?

ROWLETTE: Yeah, I gave him the whole one.

K WARE: What I was 'bout to say? How was that [U/I] yesterday?

ROWLETTE: How was the C [cocaine]?

K WARE: No. I would never ask you about no C [cocaine]. Fuck 'em [U/I].

ROWLETTE: The thang [another narcotic]? It was, uh...well, actually, it wasn't like killer...everybody, basically everybody...they comin'...and you know it ain't been no complaints. They likin' it [customers have been purchasing the narcotics without complaining]...I

kind of was glad B-Ride called. I tell you 20 people all at once. That motherfucker wouldn't stop.
K WARE: Call B-Ride and let him know that we passing out tomorrow.

ROWLETTE: I been telling people too, but you know it's a lot of people that don't even come. I been letting 'em know and I'm finna call him and let him know to let them know.³²

218. In or around October 2022, K WARE directed ROWLETTE to participate in another “pass out.” Specifically, on or about October 2, 2022, at approximately 7:31 -a.m. (TP2, Session 25977), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ROWLETTE, who was using ROWLETTE Phone 1. During the call, K WARE said, “Sup Boo!” ROWLETTE responded, “Yeah, I just talked to PD. I told him I’m on my way. I’m giving the line [Target Phone 1] to B-Ride [ALLEN], but I was trying to tell you B-Ride ain’t got no transportation.” K WARE asked, “Bro! What the fuck did I just say?” ROWLETTE responded, “I know you said...you told me to go to the pass out [distribution of free narcotics].” K WARE stated, “Hey, Bro! Listen! I got to take B-Ride some. By the time you get through, bro, you can come and get B-Ride car. I just said that.” ROWLETTE later said, “A’ight. I’m on my way to the pass out.” K WARE said, “Bro, you do a lot of talking over the phone [warning ROWLETTE he should not be discussing a “pass out” on a phone.]”

iii. KEVIN WARE and CHRISTOPHER WARE Discuss the Quality of the DTO’s Narcotics

³² Due to law enforcement protocols, law enforcement interdicted and prevented the narcotics “pass out” described in these intercepted communications.

219. The next day, on or about July 6, 2022, while C WARE was working a narcotics distribution shift using Target Phone 1, K WARE discussed the quality of the narcotics with C WARE and described a new process that K WARE had used to prepare the narcotics, which K WARE believed had enhanced the appearance and quality of the narcotics. In particular:

a. At approximately 4:08 p.m. (TP2, Session 2484), K WARE, who was using Target Phone 2, had a recorded telephone conversation with C WARE, who was using C WARE Phone 1. During that call, K WARE asked: “How they say that shit was [how did the customers like the narcotics]?” C WARE responded: “They say that shit better than the shit you got [they liked the narcotics more than the narcotics that K WARE was selling].”

b. During the above-recorded communication between K Ware and C Ware, C WARE, who was using Target Phone 1 (TP1, Session 46916), had a second conversation with an unidentified individual, who was using phone number 773-***-6610. During that call, C WARE said to the unidentified individual, “Hello? Bro, I’m right here in Auto Zone! If you look up...you and Shorty! Start paying attention, bro! I’m right here, Red. What you need? Come on, bro!”

c. Based on the content and context of this communication, and my knowledge of the investigation, I believe that in these calls, at the same time that C WARE (using C WARE Phone 1) was talking to K WARE about the quality of K WARE’s narcotics, C WARE was also arranging a narcotics transaction with an unidentified individual using Target Phone 1.

220. When C WARE returned to his call with K WARE (TP2, Session 2484), they had the following conversation:

K WARE: The shit [narcotics] I did for you for Taboo [PH].
C WARE: Oh, man...I gave that shit to old girl...listen, I gave it to motherfuckers on the line. I gave it to old girl on Normal [C WARE gave the narcotics to a female customer on Normal Avenue]. She called back instantly, like 'that shit better than the shit you got right now' [after C WARE provided the narcotics to the female customer, the customer said the narcotics were better than previously distributed narcotics].
K WARE: Guess what? You know why I asked you? 'Cause you know...you know how Lah be doing it...gotta get all the way down to oil base and let it come back [describing another seller's (Lah's) process for preparing narcotics]...Now the last shit I just did up, uh...I let it get too far that it went to oil base. You feel me?...See how I just found out my problem? I can't let it get to oil I got to catch it right there toward [U/I] when you took that shit all the way down to [U/I], something happened [the last time K WARE prepared narcotics, he used a different process, which caused something to happen to the quality of the narcotics].
C WARE: Yeah, it's something with that shit. I'm telling you 'cause the shit I got it don't look like the shit that you be having. You see what I'm saying? [the narcotics look different than usual]
K WARE: So, like I said I told you, I let it get down to oil base [U/I] 'Damn, I let this shit go too far!' This disappears in water. I had to put ice on [U/I] feel and I normally don't do that [K WARE used a different process to prepare the narcotics, which caused a change to the appearance and quality of the narcotics]."

iv. KEVIN WARE and RICKY WILLIAMS Discuss How to Interact with Narcotics Customers

221. Later in July 2022, K WARE, after checking on the status of WILLIAMS' narcotics supply, talked with WILLIAMS about the difference between selling

narcotics to crack cocaine addicts (“crackheads”) and heroin addicts (“motherfuckers that do D” or “dope fiends”). In particular:

a. On or about July 14, 2022, at approximately 10:37 p.m. (TP2, Session 4288), K WARE, who was using Target Phone 2, had a recorded telephone conversation with WILLIAMS, who was using WILLIAMS Phone 2. During this call, K WARE asked, “You ain’t got none of them [narcotics] left, do you, Buddy Love?” WILLIAMS responded, “I got a whole one [unit of narcotics] left. I was gon’ turn it to Fo’.” K WARE later said, “I’m surprised you got any left and they only gave you five [units of narcotics]...oh, that’s right. You had some left over from yesterday.” WILLIAMS said, “Yeah, but you know it’s been turtle mode today [narcotics sales have been slow].”

b. K WARE later said, “These ain’t crackheads. It ain’t what you do it’s how you do it...what I’m sayin’ is y’all so used to talking to crackheads, you can’t talk to them motherfuckers like you talk to crackheads [K WARE telling WILLIAMS that WILLIAMS cannot talk with a heroin addict the same way he talks with a crack cocaine addict]. Them motherfuckers that do D [heroin], they ain’t like...when they smoke that shit [crack cocaine], you could talk to them any type of way. They still gon’ run you they money...dope fiends [heroin addicts] like, ‘Nigga, fuck you! You need us! Nigga, we can go somewhere else. Somebody else got the same shit.’” WILLIAMS replied, “Right, exactly.” K WARE stated, “So, y’all got the...I’m letting y’all see ‘cause it’s so easy for me to get them back, but I’m letting y’all see how it is from where you first got started to what y’all [U/I] to.” WILLIAMS stated, “Yeah, I see the difference.”

v. KEVIN WARE and DARRELL BROOKS Discuss their Narcotics Customers

222. In September of 2022, while BROOKS was using Target Phone 1 to distribute narcotics to customers, K WARE talked to BROOKS about narcotics customers who were waiting for BROOKS (“people waitin’ on the block”), and K WARE gave narcotics to BROOKS to sell to the customers. In particular:

a. On or about September 22, 2022, at approximately 1:06 p.m. (TP2, Session 17633), K WARE, who was using Target Phone 2, had a phone conversation with BROOKS, who was using BROOKS Phone 1. During that call, K WARE stated: “Hey, D! These people waitin’ on the block for you man [customers were waiting for BROOKS].” BROOKS replied: “Okay. You got it [narcotics] in the house? I ain’t got no more. I’m on my way there now.” K WARE stated, “Man, that shit [narcotics] been there bro.” BROOKS responded, “I didn’t know. I just talked to you.” K WARE stated: “That’s how fast I move. Go to [U/I].” BROOKS replied, “Okay. I’m on my way to go grab it [the narcotics supplied by K WARE].”

b. Based on intercepted communications over Target Phone 1, and on my knowledge of the investigation and on the knowledge of other agents involved in the investigation, I believe that BROOKS was using Target Phone 1 at the time of his call with K WARE to distribute narcotics to customers. For example, at approximately 1:00 p.m. (about six minutes before the call above with K WARE) (TP1, Session 86948), BROOKS, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, using phone number 872-***-3087. During the call, the unknown individual said, “Hey, you around?...I need some hard [crack

cocaine].” BROOKS asked, “You need some hard?” The individual stated, “Yeah” and BROOKS stated: “Here I come right there, you ain’t need no soft [powder cocaine or heroin], you just need hard [crack cocaine], right?” The individual responded, “Aha” and BROOKS said: “A’right, here I come.”

c. At approximately 1:09 p.m. (about 3 minutes after the call above with K WARE) (TP1, Session 86962), BROOKS, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using telephone number 773-***-6525. The unknown individual asked, “Hey ya’ll got still got some, you got some hard [crack cocaine]?” BROOKS said, “Yeah I got some hard, what’s up, where you at?” The unknown individual said, “I’m on 113th and King Drive, man I’m so sorry I should’ve gotten that from you when I was there man.” BROOKS said, “A’ight give me a minute man...I know where you at man.”

**vi. KEVIN WARE and BRANDAN ALLEN Discuss Narcotics
“Specials” for their Narcotics Customers**

223. In or around September 2022, ALLEN, using Target Phone 1, communicated with a narcotics customer who asked whether the DTO was selling narcotics to customers at a discounted price (a “special”). Minutes after the call, ALLEN had a recorded telephone conversation with K WARE in which ALLEN (1) informed K WARE that ALLEN had been offering the “special” and (2) asked K WARE whether he could continue to offer the special to customers. K WARE informed ALLEN that, although the DTO had stopped offering the special, ALLEN could continue to offer it (“let them know it’s on”), because ALLEN had been offering the

special, and K WARE did not want to deal with customer complaints (“people call back talking about what they didn’t get”). In particular:

a. On or about September 30, 2022, at approximately 10:47 a.m. (TP1, Session 96787), ALLEN, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using telephone number 312-***-0811. During this call, the unknown individual asked, “Hey, what up, bro? The special over with, right...Is the special over with, bro? ALLEN asked, “[H]as it been over with it though?” The unknown individual stated: “No, uh-uh, but you know...you said it was gonna be ‘til the end of September. It’s October. That’s why. It’s the reason I’m asking, bro. ‘Cause I get more bang for the buck tomorrow...now, if it’s not over with, then Ima need five of them [if the special was still going, the customer wanted five units of narcotics].” ALLEN responded, “A’ight, I’ll call you when I’m outside.”

b. On or about September 30, 2022, at approximately 10:52 a.m. (about 5 minutes after the call above), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ALLEN, who was using ALLEN Phone 1. During the call, ALLEN asked, “Special still going?” K WARE stated, “Yeah...Oh nah, that shit ends on the what’s its name. You knows you ain’t been servin’ no specials [WARE telling ALLEN that the DTO is no longer offering the narcotics special].” ALLEN stated, “I have been. Shit....Man, nah...I’m tryin a...Shit...Clean up my mistake if I am.” K WARE asked, “What you got? How many you done did [how many narcotics have you sold]?” ALLEN replied, “Like four [units of narcotics]...Oh, so the

special is over with?” WARE said, “Yeah.” ALLEN asked: “Why you ain’t tell me nothing?” K WARE responded, “Fuck it man. Go ahead and tell people it’s on bro [ALLEN can continue to offer the special]. Fuck it. We’ll keep it up till the end of this week man, since you done did it. Just keep it up. Fuck it, if you did it. Now I don’t want you to start saying ‘it’s still on,’ and then people call back talking about what they didn’t get [K WARE did not want to deal with customer complaints if ALLEN stopped offering the special]. You feel me?” ALLEN said, “Okay, a’ight. I got you.” K WARE said, “So let them know it’s on, and those that you didn’t give it to, why don’t you just call them back and give it to them bro, so I won’t have to clean that shit up. ...And you make out with all the money.” ALLEN replied, “A’ight, cool.”

C. DTO Members and KEVIN WARE Discuss the DTO’s Interactions with Law Enforcement

i. KEVIN WARE, CHRISTOPHER WARE, and BRANDAN ALLEN Discuss Law Enforcement’s July 1, 2022 Recovery of Guns and Drugs from the DTO’s Stash House

224. As previously discussed above, on or about July 1, 2022, law enforcement recovered guns and suspected drugs from the stash house located at 11749 S. Union Ave. After that incident, members of the DTO discussed the incident with K WARE. For example:

a. On or about July 1, 2022, at approximately 8:12 p.m. (about one hour after the seizure) (TP2, Session 1220), C WARE, who was using C WARE Phone 1, had a recorded telephone conversation with K WARE, who was using Target Phone 2, in which they discussed the police “hit[ting]” the “trap.”

b. At approximately 10:33 p.m. (about 3 hours after the seizure) (TP2, Session 1265), K WARE, who was using Target Phone 2, had a recorded telephone conversation with ALLEN, who was using ALLEN Phone 1, in which they discussed law enforcement's recovery of "seven poles [firearms]."

ii. KEVIN WARE and RICKY WILLIAMS Discuss Law Enforcement's September 9, 2022 Recovery of Narcotics from WILLIAMS

225. On or about September 9, 2022, WILLIAMS discussed meeting with K WARE at the stash house to obtain narcotics from K WARE before WILLIAMS began a narcotics distribution shift using Target Phone 1. Law enforcement then observed both K WARE and WILLIAMS conduct a suspected hand-to-hand narcotics transaction outside the stash house and observed WILLIAMS place an object into his waistband area. Shortly after, WILLIAMS began taking narcotics orders over Target Phone 1, and law enforcement stopped WILLIAMS and recovered two clear plastic baggies containing 46 individually wrapped baggies with Superman logos containing suspected narcotics from WILLIAMS' waistband area. Minutes after law enforcement recovered the suspected narcotics, WILLIAMS reported his interaction with law enforcement to K WARE, telling K WARE that law enforcement recovered "two jabs" from him. WILLIAMS then proceeded to distribute additional narcotics to customers using Target Phone 1. In particular:

a. On or about September 9, 2022, at approximately 2:54 p.m. (TP2, Session 8200), K WARE, who was using Target Phone 2, had the below recorded

telephone conversation with an unknown male (referred to herein as UM1-24993), who was using telephone number 773-***-4572:

K WARE: Hey, I don't know what's going on
UM1-24993: Did you look at it?
K WARE: Nah. I was getting ready to come over there. I've been trying to get this shit [narcotics] ready for when what's-his-name come on [for the next shift worker working Target Phone 1].
UM1-24993: Alright.
K WARE: When Buddy Love [WILLIAMS] getting' ready to come on
UM1-24993: A'ight, right, a'ight.
K WARE: I'm getting' ready to come over that way.

226. Roughly ten minutes after the call above, at approximately 3:04 p.m. (TP2 Session 8209), K WARE, who was using Target Phone 2, had a recorded telephone conversation with WILLIAMS, who was using WILLIAMS Phone 2. During their call, the following conversation occurred:

K WARE: I'm, I'm by the trap [stash house] man. I don't know.
WILLIAMS: A'ight.
K WARE: Bring that [U/I]. Bring that too.
WILLIAMS: Huh?
K WARE: Bring that front money here man.
WILLIAMS: Man, I'm not coming over there boy. You crazy.
K WARE: [Voices overlap] What, by the trap [stash house]?
WILLIAMS: I'm not coming over there.
K WARE: You said by the trap?
WILLIAMS: You want me to come over there man?
K WARE: You said you ain't coming by the trap?
WILLIAMS: Man, you said don't be coming over there man.
K WARE: No, no look. I'm talkin' 'bout...You know if I, if I say by the trap, you already know. Either that or across the street.
WILLIAMS: [Voices overlap] Right. That's right.
K WARE: But I stay [U/I] the rotation [U/I] trap.
WILLIAMS: Right, right, right, right. A'ight, I'm finna come now. I'm finna come now.
K WARE: Yeah, 'cause this...Hold on. A'ight. A'ight. [Background: Clinking sounds]
WILLIAMS: A'ight.

227. Law enforcement monitoring remote mobile surveillance equipment then observed the following between approximately 3:18 p.m. and 3:39 p.m.:

a. WILLIAMS walked into the stash house located at 11749 S. Union Ave and a silver Nissan Altima with Illinois registration number AN17585 (the “Silver Nissan”) parked next to the stash house. K WARE then entered the driver door of the Silver Nissan while WILLIAMS approached the driver’s side door of the Silver Nissan and conducted a suspected hand-to-hand narcotics transaction with K WARE. WILLIAMS then tucked something inside his waistband as an unknown male entered the front passenger seat of the Silver Nissan and the car departed the area.

b. At approximately 3:29 p.m., WILLIAMS entered a white Saturn SUV bearing Illinois Temporary Registration number 461AA549 (the “White Saturn”)³³ parked at approximately 703 W. 117th Place.

c. At approximately 3:38 p.m., a dark colored SUV drove westbound on 117th Place from Union Ave. and approached the White Saturn, which was still parked at approximately 703 W. 117th Pl. The SUV double-parked parallel to the White Saturn and briefly met with WILLIAMS before departing.

228. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement officers involved in the investigation, the surveillance described above, the content and context of the intercepted calls above and below, and the seizure of narcotics described below, I

³³ According to Illinois Secretary of State vehicle registration records, the White Saturn is registered to WILLIAMS, with an address of 11946 S. Eggleston Avenue, Chicago, Illinois.

believe that WILLIAMS met with K WARE to obtain narcotics and that WILLIAMS then received Target Phone 1 and began using Target Phone 1 to sell narcotics to customers.

229. Law enforcement maintained mobile surveillance of WILLIAMS as he drove the White Saturn and observed WILLIAMS make several stops and conduct suspected hand-to-hand narcotics transactions with unknown individuals.

230. During this same time, intercepted communications over Target Phone 1 reflected that WILLIAMS was working a narcotics distribution shift while using Target Phone 1 as he drove the White Saturn (TP1, Sessions 71552-71561.)

231. At approximately 3:56 p.m., law enforcement stopped the White Saturn at approximately 11943 S. Halsted. According to law enforcement surveillance and audio and video recordings of the stop, officers recovered from WILLIAMS' waistband two clear plastic bundles containing a total of 46 individually wrapped plastic baggies with Superman logos containing a white powdery substance. According to the DEA Laboratory, the contents of the plastic baggies with Superman logos tested positive for the presence of a mixture of heroin, fentanyl, and the fentanyl analogue p-fluorofentanyl, and weighed approximately 16.05 grams.

232. At approximately 4:05 p.m., law enforcement placed a covert call to Target Phone 1 during the traffic stop. According to law enforcement and video recordings, law enforcement confirmed that simultaneously, a phone rang inside the White Saturn.

233. Roughly two minutes after WILLIAMS' encounter with law enforcement concluded, at approximately 4:07 p.m., WILLIAMS, using WILLIAMS Phone 2, made a recorded telephone call to K WARE, who was using Target Phone 2. During the call, K WARE said, "Hey, Buddy Love." WILLIAMS asked, "Where you at man...The police just had me, G....bro, they just took two jabs [the two bundles of narcotics with Superman logos] from me." K WARE asked, "The police?" WILLIAMS stated, "They just took two whole ones [the two bundles of narcotics] from me bro." K WARE asked, "And said, what?" WILLIAMS stated, "They just told me, 'you ain't got no pistol in the car so you cool.'"

234. WILLIAMS then continued to distribute narcotics that same afternoon and evening using Target Phone 1. For example, less than 90 minutes after WILLIAMS' call with WARE, at approximately 5:29 p.m., WILLIAMS, who was using Target Phone 1, had a recorded telephone conversation with an unknown individual, who was using telephone number 773-***-3147. During this call, the unknown individual stated, "I need six hard [six units of crack cocaine]." WILLIAMS responded, "Come outside." The unknown individual then stated, "I'm gonna be outside right now."

CONCLUSION

235. Based on the above information, I respectfully submit that there is probable cause to believe that beginning no later than on or about February 9, 2022, and continuing until at least on or about November 3, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, KEVIN WARE,

CHRISTOPHER WARE, BRANDAN ALLEN, RICKY WILLIAMS, DARRELL BROOKS, LEROY PRESLEY, and ERNEST ROWLETTE conspired with each other, and with others known and unknown, to knowingly and intentionally distribute a controlled substance, namely, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of fentanyl analogue (N-(4-Fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide) (p-Fluorofentanyl) a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

FURTHER AFFIANT SAYETH NOT.

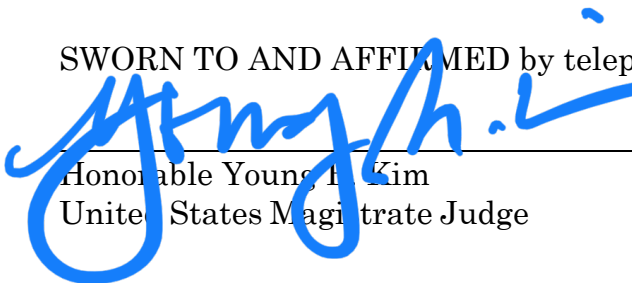


MASUD HAIDARI

Task Force Officer, Drug Enforcement
Administration

bf


SWORN TO AND AFFIRMED by telephone July 25, 2023.


Honorable Young H. Kim
United States Magistrate Judge