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AO 91 (Rev. 12/11) Criminal Complaint

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL PEARSON, a/k/a "Cuzzo",
KEVIN WARE, a/k/a "Twin" and "Hustle", and
JAMIE PEARSON

CASE NUMBER: 23 CR 422

~~UNDER SEAL~~

CRIMINAL COMPLAINT

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

Count One

On or about February 4, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants MICHAEL PEARSON and KEVIN WARE violated:

Code Section

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

Offense Description

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

Count Two

On or about July 16, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants MICHAEL PEARSON and JAMIE PEARSON violated:

Code Section

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

Offense Description

Did knowingly and intentionally distribute a controlled substance, namely, 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 a quantity of a mixture and substance containing a detectable amount of heroin, 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)

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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 26, 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(a)(1), 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 and 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

A. Background

4. Since approximately October 2020, the United States, including the DEA, has conducted an extensive investigation into the Chicago Gangster Disciples operating on Chicago's southeast side, and in particular, their involvement in narcotics distribution, in violation of Title 21, United States Code, Section 841(a)(1). During the course of the investigation, confidential sources and undercover officers conducted numerous controlled purchases of narcotics, including heroin, cocaine, and fentanyl, from members of the drug trafficking organization ("DTO"). During the course of its investigation, the DEA learned that MICHAEL PEARSON ("M PEARSON"), KEVIN WARE, and JAMIE PEARSON ("J PEARSON") distributed controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

5. More specifically, as detailed below, M PEARSON distributed narcotics to undercover law enforcement sources ("CS-1," "CS-2," and "CS-3", collectively the

“CSs”)¹ on or about January 27, 2021, February 23, 2021, March 11, 2021, March 18, 2021, March 30, 2021, April 6, 2021, May 6, 2021, May 21, 2021, and June 2, 2021. Moreover, on or about February 4, 2021, M PEARSON and WARE distributed narcotics to CS-1 and CS-2, while on or about July 16, 2021, M PEARSON and J PEARSON distributed narcotics to CS-2 and CS-3. The CSs coordinated each of these controlled transactions with M PEARSON by communicating with M PEARSON on multiple telephone numbers, including 708-XXX-8118 (“Target Phone 1”), 312-XXX-4685 (“Subject Phone 2”), and 312-XXX-9966 (“Subject Phone 3”). As discussed below,

¹ As of April 2022, CS-1 had been cooperating with law enforcement since in or around April 2010. CS-1 has three prior felony drug convictions. CS-1 was cooperating with law enforcement for financial compensation. As of April 2022, CS-1 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. CS-1 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, CS-1 participated in a controlled transaction, at direction of law enforcement. Following the May 11, 2022 controlled transaction, law enforcement learned of facts suggesting that CS-1 may not have provided law enforcement with the full quantity of narcotics that CS-1 obtained during the May 11, 2022 transaction. As a result, law enforcement ceased to utilize CS-1 in situations in which CS-1 would be asked to handle narcotics. Notwithstanding the above, law enforcement still believes that the information that CS-1 has provided during the course of this investigation has been reliable.

CS-2 has been cooperating with law enforcement since approximately April of 2019. CS-2 has 18 prior arrests and 6 convictions. CS-2 is cooperating with law enforcement for financial compensation. To date, CS-2 has been paid approximately \$5,000. Information provided by CS-2 has been corroborated based on recorded communications, surveillance, and multiple narcotics seizures. Accordingly, law enforcement believes CS-2 to be a reliable source of information.

CS-3 has been cooperating with law enforcement since approximately December of 2019. CS-3 has 11 prior arrests and no convictions. CS-3 is cooperating with law enforcement for consideration on pending charges in New Orleans, Louisiana, relating to the distribution of heroin. No promises have been to CS-3 regarding the resolution of this matter from New Orleans. Information provided by CS-3 has been corroborated through recorded communications, surveillance, and multiple narcotics seizures. Accordingly, law enforcement believes CS-3 to be a reliable source of information.

many of the controlled narcotics transactions were captured by covert audio and video recording devices, although the recording devices malfunctioned during certain transactions.

B. January 27, 2021, MICHAEL PEARSON Distributes 2.86 Grams of a Fentanyl and Heroin Mixture to CS-1

6. In approximately October 2020, CS-1 informed law enforcement that s/he could purchase narcotics from individuals operating on the southeast side of Chicago, and in January 2021, CS-1 advised law enforcement that s/he could purchase narcotics from an individual who was using Target Phone 1.

7. On or about January 27, 2021, at approximately 11:54 a.m., CS-1 had a recorded phone conversation with MICHAEL PEARSON, who was using Target Phone 1.² During the call, CS-1 said, “This [CS-1], yo.” PEARSON said, “106th, we, we be meetin’ at Wentworth?” CS-1 said, “Yeah, Wentworth, yeah.” PEARSON said,

² During the course of the investigation, multiple individuals used Target Phone 1. PEARSON has been identified as the user of Target Phone 1 and Subject Phone 2 in the recorded conversations specified in this affidavit as follows: 1) CS-1 and CS-2 both identified a known photograph of PEARSON as the individual with whom they met during the narcotics transactions, as discussed herein; 2) law enforcement has compared the voice of the user of Target Phone 1 and Subject Phone 2 to the recorded voice of PEARSON from the covert audio recordings during the narcotics transactions described below; and 3) as detailed below, law enforcement surveillance observed an individual identified as PEARSON (based on a comparison to a known photograph of PEARSON) travelling to and from multiple narcotics transactions. Moreover, as discussed below, on or about February 19, 2021, CPD conducted a stop of a vehicle driven by PEARSON, and PEARSON provided an Illinois driver’s license for Michael PEARSON. During the stop, PEARSON’s voice was recorded and, based on a comparison between PEARSON’s voice and the user of Target Phone 1 and Subject Phone 2 on calls in which PEARSON has been identified, law enforcement has confirmed that PEARSON was using Target Phone 1 and Subject Phone 2 during calls where indicated.

“I’ll be over there in like seven or eight minutes. I’m on 119th and Wentworth, coming that way.”³

8. At approximately 11:57 a.m., CS-1 and CS-2 met with law enforcement and were searched for contraband and excess currency, with none found, and equipped with audio/video recording equipment.⁴ CS-1 was also provided with approximately \$100 in pre-recorded law enforcement funds to use as buy money for the planned narcotics transaction.

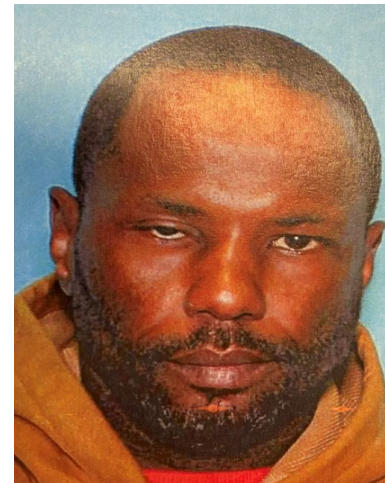
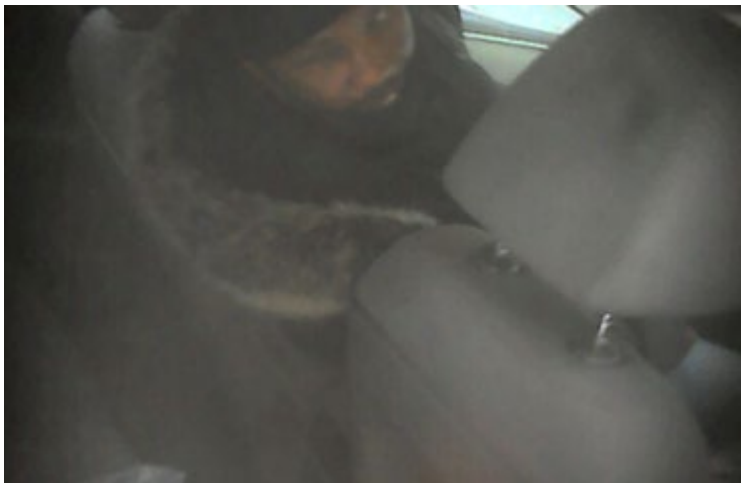
9. At approximately 11:59 am, CS-1 had a recorded phone conversation with PEARSON, who was using Target Phone 1. During the call, CS-1 advised PEARSON that CS-1 was “standing on the corner of my block” and PEARSON replied, “Alright, bro, I’m finna pull up, bro. I’m on 108th and Wentworth.”

10. Shortly thereafter, law enforcement surveillance observed a white Chevrolet Malibu, bearing Illinois temporary registration 445AA635 (“Subject Vehicle 1”) pull up and park in the area of the 106th block of South Wentworth Avenue. Surveillance observed CS-1 approach the front passenger-side of Subject

³ Some of the conversations detailed herein have been summarized and excerpted in this affidavit. The summaries of the recorded conversations do not include all statements made or topics covered during the course of the recorded conversations. I based the summaries and the language quoted from the recorded conversations on draft transcripts prepared by myself and other law enforcement officers involved in this investigation. At various points in the Affidavit, I also have indicated (sometimes in brackets) my interpretation of words and phrases used in the recorded conversations. My summaries and interpretations also are based on the context of the recorded conversations, events occurring before or after the recorded conversations, information received from confidential sources, my knowledge of the investigation as a whole, my training and experience, and the training and experience of other law enforcement officers involved in this investigation.

⁴ CS-1’s audio/video recording equipment malfunctioned and provided no useable recordings from this transaction.

Vehicle 1, enter, and then exit shortly thereafter. Surveillance agents then observed CS-1 walk away from Subject Vehicle 1 and CS-2, in turn, approach the passenger side of Subject Vehicle 1 and engage in conversation through the passenger-side window. CS-2's interaction with PEARSON was captured on the recording equipment provided to CS-2. A screen shot from that interaction is shown below, next to a photo of PEARSON from the Illinois Secretary of State:



11. CS-2 then walked away from Subject Vehicle 1, which subsequently exited the area.

12. CS-1 and CS-2 subsequently met with agents, at which time agents recovered from CS-1 approximately 11 clear bags containing in total what was later confirmed by lab testing to be approximately 2.86 grams of a mixture of heroin and fentanyl.

13. CS-1 explained that when Subject Vehicle 1 arrived in the area, CS-1 walked over and entered the front passenger side. CS-1 said that the vehicle was occupied by a single black male. CS-1 then provided the individual with \$100 in exchange for 11 bags of heroin. CS-1 said that after the exchange, CS-1 pointed to

CS-2 and informed the individual in Subject Vehicle 1 that CS-2 was an associate and would like to purchase heroin in the future. The individual agreed to meet CS-2. CS-1 then exited Subject Vehicle 1, walked away, and directed CS-2 to Subject Vehicle 1. According to CS-2, CS-2 then walked to the passenger side of Subject Vehicle 1 and had a brief conversation with the same driver of Subject Vehicle 1.

14. As discussed below, on or about February 19, 2021, CS-1 and CS-2 were shown a known photograph of M PEARSON and identified M PEARSON as the individual in Subject Vehicle 1 with whom they met.

C. February 4, 2021, MICHAEL PEARSON and KEVIN WARE Distribute 7.28 Grams of a Fentanyl and Heroin Mixture to CS-1 and CS-2

15. On or about February 1, 2021, at approximately 11:46 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-1 self-identified as the person who had previously met with PEARSON at 106th and Wentworth (on January 27th), stating, “This is [CS-1] off 106th...right off Wentworth, bro. You know how I...meet you at the corner.” CS-1 referenced CS-2’s presence at the last transaction, stating, “You know last time, I had my homie, uh, with me, [CS-2], the old man who work with me?” CS-1 further stated, “Ok check this out, we get paid like Wednesday or Thursday right, we talking about spending like three jewels [\$300], we gunna be able to get a deal [on the \$300 worth narcotics transaction] man? Cuz [CS-2] said he liked that shit.”⁵ M PEARSON

⁵ Reference is made to recorded in-person and telephone communications in this affidavit. The transcripts of the recorded 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 communications in this affidavit do not include

replied, “Bro I don’t know you gotta take it up with Tiger bro I’m just the messenger, you know what I’m saying? You gotta catch him.” [M PEARSON explained that an individual known as “Tiger” sets the price of narcotics.]

16. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, CS-1 told M PEARSON that he/she had previously purchased narcotics from M PEARSON at 106th and Wentworth, that CS-2 (“Cuz”) liked the narcotics, and that CS-1 and CS-2 would like to purchase \$300 worth of narcotics from M PEARSON and get a “deal.” In response, M PEARSON explained that an individual known as “Tiger” set the price of narcotics.

17. On or about February 4, 2021, at approximately 11:00 a.m., CS-1 and CS-2 were searched for contraband or excess currency, with none found, and equipped with audio/video recording equipment. CS-2 was provided with \$300 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

18. At approximately 11:03 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-1 said, “Listen I got like three I’m gon spend bro [\$300 for narcotics]. So you got to bring a jab [12-15 bags of narcotics] with you. On Wentworth.” M PEARSON replied, “Alright give me like, what you, you want 30 [bags] on bro?” CS-1 responded, “Yeah, whatever I

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.

can get for 300 [dollars], nigga.” M PEARSON told CS-1 he would arrive in 15 minutes.

19. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation CS-1 informed M PEARSON that CS-1 wanted to purchase \$300 dollars’ worth of narcotics from M PEARSON, and PEARSON asked whether CS-1 wanted 30 bags of narcotics.

20. At approximately 11:15 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON said, “Hey bro get ready to walk up there, I’m finna go get it [the narcotics] together I’ll meet you right there in like 15 minutes.” CS-1 responded, “Ok you’ll be there in 15 ok ok brother...hey man please bring at least like 36 [bags of narcotics], though.” M PEARSON replied, “But I’m saying we don’t do no deals...we don’t do no deals.”

21. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, M PEARSON informed CS-1 that M PEARSON was getting the narcotics ready for distribution; CS-1 informed M PEARSON that CS-1 wanted to purchase 36 bags of narcotics; and M PEARSON informed CS-1 that M PEARSON and his drug organization does not give extra narcotics out during drug transactions.

22. At approximately 11:29 a.m., CS-1 had another recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON told CS-1, “Meet you on 106th.”

23. At approximately 11:39 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON told CS-1 that he was “going to pull over right by the tire shop across the street.”

24. At approximately 12:00 p.m., surveillance observed Subject Vehicle 1 arrive in the area of 107th and Wentworth before parking outside a residence on South Wentworth Avenue. Surveillance then observed CS-1 enter the front-passenger seat of Subject Vehicle 1 and CS-2 enter the rear passenger seat. Surveillance followed Subject Vehicle 1 to a nearby residence further south on South Wentworth Avenue, where it parked.

25. While in Subject Vehicle 1, as captured by the CS audio/video recording equipment, CS-1 asked M PEARSON, who was the driver and sole occupant of the vehicle, “You got 36 [bags of narcotics] with you?” M PEARSON stated, “my man finna meet me with the rest [of the 36 bags of narcotics].” While CS-1 and CS-2 were still in Subject Vehicle 1, M PEARSON had a phone conversation on speaker phone with KEVIN WARE.⁶ During this call, WARE stated, “I’m gonna pull right up to you. I got

⁶ WARE was identified as follows: As discussed below, on February 4, 2021, at approximately 11:57 am, Chicago Police Department (“CPD”) officers performed a stop of Subject Vehicle 2 for identification purposes. WARE, the driver of Subject Vehicle 2, provided CPD officers with fictitious information. WARE was not taken into custody and was released due to an ongoing investigation. Law enforcement officers performed a Chicago Police database search and located a photograph of KEVIN WARE and sent the same to agents. Agents showed the same photo of WARE to CS-1 and CS-1 positively identified the photo of WARE as that of the driver of Subject Vehicle 2. WARE is known to CS-1 by the nickname “Twin.” During the stop, WARE’s voice was recorded and, based on a comparison between WARE’s voice and the voice of the individual with whom M PEARSON communicated on speaker phone on February 4, 2021, law enforcement has confirmed that M PEARSON was communicating with WARE.

something [narcotics] for you; all you gotta do is open it up and take nine [bags of narcotics] out and give him [CS-1] 30 [bags of narcotics].” M PEARSON stated, “He [CS-1] want 26, bro” but CS-2 stated, “No, I want 36[bags of narcotics].” M PEARSON told WARE, “the kit [narcotics package] that I have bro, I started on it, that’s how I couldn’t cover it [M PEARSON started selling narcotics from his package and did not have enough narcotics remaining to provide to CS-1].” WARE stated, “I know that, bro. So what I’m tryin to tell you is, so you won’t fuck up your kit...I’ll put 39 [bags of narcotics] on that one bro; so you can just take nine [bags of narcotics] out and give him his 30 [bags of narcotics] and let him go about his way...and you still got your nine [bags of narcotics] left to the side.”

26. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, WARE informed M PEARSON that WARE was going to drop off narcotics for M PEARSON to distribute to CS-1 and CS-2; that M PEARSON informed WARE that M PEARSON was unable to provide the amount of narcotics requested by CS-1 because M PEARSON had already sold some of his narcotics supply (from M PEARSON’s “kit”); and WARE informed M PEARSON that WARE would provide M PEARSON with 39 bags of narcotics, which would be enough for M PEARSON to distribute 30 bags of narcotics to CS-1 and still have nine bags of narcotics to sell later.

27. Shortly after, at approximately 11:45 a.m., surveillance observed a silver Nissan (“Subject Vehicle 2”) bearing Illinois registration AN17585 arrive and park in the area. Surveillance observed an individual later identified as KEVIN

WARE exit Subject Vehicle 2, walk over to Subject Vehicle 1, and tossed an item inside. According to the CS audio/video recording equipment WARE⁷ stated, “That’s the 39.” WARE then departed the area in Subject Vehicle 2.

28. Based on my training, experience, and familiarity with this investigation, the training and experience of other law enforcement agents, the calls and surveillance observations described above, and information provided by CS-1 and CS-2, I believe that KEVIN WARE provided 39 bags of narcotics to M PEARSON, so that M PEARSON could distribute 30 bags of narcotics to CS-1 and CS-2.

29. Surveillance then observed Subject Vehicle 1 depart the area and return to the area of Wentworth Avenue and 107th Street, where CS-1 and CS-2 were observed exiting Subject Vehicle 1. Subject Vehicle 1 then left the area.

30. At approximately 11:57 a.m., Chicago Police Department (“CPD”) officers performed a stop of Subject Vehicle 2 for identification purposes. WARE, the driver of the Nissan, provided CPD officers with fictitious information, but I believe the driver of Subject Vehicle 2 was WARE, based on a comparison of the individual driving Subject Vehicle 2 to a photograph of WARE from the Illinois Secretary of State. A screen shot from that interaction, which was captured on officer body-worn camera (“BWC”) is shown below, next to a photo of WARE from the Illinois Secretary of State:

⁷ Law enforcement has identified the voice of the individual with whom M PEARSON communicated as the voice of WARE, based on a comparison to the voice of WARE in the February 4, 2021 stop described above.



31. Shortly thereafter, law enforcement met with CS-1 and CS-2 in a predetermined meet location and CS-1 and CS-2 provided law enforcement with approximately 30 clear plastic bags containing what was later confirmed by DEA lab testing to be approximately 7.28 grams of a mixture of heroin and fentanyl.

32. CS-1 explained that CS-1 and CS-2 had met with M PEARSON in Subject Vehicle 1 and that during the meeting, M PEARSON stated that he did not have all of the heroin. CS-1 related that M PEARSON then placed a phone call and informed CS-1 and CS-2 that they would need to relocate to 120th Street and Wentworth Avenue to get the heroin. M PEARSON then drove Subject Vehicle 1, with CS-1 and CS-2 inside, to the area of 120th Street and South Wentworth. Shortly thereafter, a silver Nissan (Subject Vehicle 2) arrived and parked in the area. WARE exited Subject Vehicle 2, walked over to Subject Vehicle 1, and tossed a small cardboard "Milk Duds" box into Subject Vehicle 1. Subject Vehicle 1 then left the area. CS-1 said that M PEARSON recovered the cardboard Milk Duds box and retrieved a bundle of zip-lock bags containing suspect heroin from inside. CS-1 said

that M PEARSON then counted out thirty of these bags and handed them to CS-2 and in return, CS-2 gave the \$300 in pre-recorded law enforcement funds to M PEARSON.

D. February 19, 2021 Stop and Identification of MICHAEL PEARSON

33. On or about February 19, 2021, at approximately 2:48 p.m., CPD officers conducted a stop of Subject Vehicle 1 in the area of 10740 S. Michigan Avenue, in Chicago.

34. During the stop, M PEARSON provided an Illinois driver's license for "MICHAEL PEARSON," and M PEARSON was released without any citations. The interaction was captured on officer BWC and a screen capture from that interaction appears below:



35. After the stop, law enforcement showed CS-1 and CS-2 a known photograph of M PEARSON, and they identified him as the individual in Subject Vehicle 1 with whom they met on January 27, 2021, and February 4, 2021.

E. February 23, 2021, MICHAEL PEARSON Distributes 7.33 Grams of a Fentanyl and Heroin Mixture to CS-2

36. On or about February 23, 2021, at approximately 9:01 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-1 told M PEARSON that the “dude [CS-2] that came and got that kit [narcotics]” would be at CS-1’s home at 10:00 a.m. and could meet M PEARSON on Wentworth.

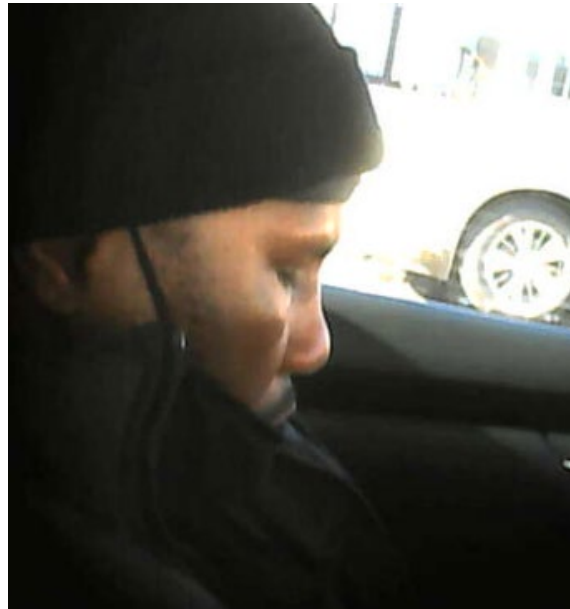
37. At approximately 11:00 a.m., CS-2 was searched for contraband or excess currency, with none found, and equipped with audio/video recording equipment. CS-2 was also provided with \$300 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

38. At approximately 11:23 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-1 asked M PEARSON, “You got that kit [narcotics package] ready for me man? We be up here by the tire shop.” M PEARSON asked, “What you trying to do bro?” CS-1 answered, “Ahh, 30 [30 bags of narcotics] bro.”

39. At approximately 11:32 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON asked, “Where y’all at?” and CS-2 replied, “Right here in front of the tire shop.” M PEARSON stated “Alright, I’m right here on 115th; I’m finna pull up in three minutes.” CS-1 stated, “Ok.”

40. At approximately 11:30 a.m., surveillance agents observed Subject Vehicle 2 arrive and park at approximately 105th Street and South Wentworth

Avenue facing north. Surveillance subsequently observed CS-2 enter the passenger side of Subject Vehicle 2, and CS-2's recording device captured the side of M PEARSON's face:



41. At approximately 11:37 am, surveillance agents observed CS-2 exit Subject Vehicle 2 and walk south on South Wentworth Avenue.

42. Shortly thereafter, law enforcement met with CS-2 at a prearranged meeting location at which time CS-2 provided law enforcement with 31 bags containing what was later confirmed by DEA testing to be approximately 7.33 grams of a mixture of heroin and fentanyl. According to CS-2, CS-2 purchased the narcotics for \$300 from PEARSON.

F. March 11, 2021, MICHAEL PEARSON Distributes 8.20 Grams of a Fentanyl and Heroin Mixture to CS-2

43. On or about March 11, 2021, between approximately 11:12 a.m. and 11:32 a.m., CS-1 and CS-2 had recorded phone conversations with M PEARSON, who

was using Target Phone 1. During the calls, M PEARSON indicated that he did not remember CS-1 or CS-2. In particular:

a. At approximately 11:12 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 stated, “This is [CS-2], [CS-1’s] guy. Um, I’m out here, can I do something [buy narcotics] right now?” M PEARSON responded, “Bro, I don’t even know you...We ain’t around [I’m not selling narcotics right now].”

b. At approximately 11:26 a.m., CS-1 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-1 said, “It’s [CS-1].” M PEARSON asked “[CS-1] who, bro?” CS-1 responded, “[CS-1] that stays on 106th.” Later in the call, CS-1 said, “we was buying the kits, bro. We had bought the kit that time we was in the car [CS-1 references a previous narcotics purchase from February 4, 2021].” M PEARSON responded, “That wasn’t me bro, I, I, I been outta town. This Cuzzo.” CS-1 said, “he’ll [CS-2] be calling you.”

c. At approximately 11:32 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, “This is [CS-2]....[CS-1’s] guy.” M PEARSON responded, “Bro, I don’t know you...We not around [I’m not selling narcotics now].”

44. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversations, CS-1 and CS-2 tried to arrange a narcotics deal with M PEARSON, but M PEARSON indicated that he did not know CS-1 and CS-2. When CS-1 tried to remind M PEARSON that CS-1 and CS-2

previously purchased a “kit” of narcotics from M PEARSON in M PEARSON’s vehicle, M PEARSON indicated that they obtained the narcotics from someone else, as M PEARSON was out of town. M PEARSON further indicated that he was not selling narcotics at the moment.

45. At approximately 11:34 a.m. and 11:35 a.m., M PEARSON called CS-2 and told CS-2 that he remembered who CS-2 was and would meet CS-2 to conduct the transaction. In particular:

a. At approximately 11:34 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON stated, “My bad, man, this, this Cuzzo, man...You keep sayin [CS-1]. There’s a thousand [CS-1’s]...he [CS-1] just called me and told me you gonna be callin me. You the ones that got the 30 [bags of narcotics on February 4, 2021]. I remember you now.”

b. At approximately 11:35 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON asked, “Hey, where you at, man?” CS-2 replied, “I’m by the tire shop.” M PEARSON stated, “I didn’t know who you was, man...I got to lock your name in [save CS-2’s number in Target Phone 1]. This Cuzzo, man....My bad, man. That’s on me, man. I’m finna lock your number in. Just go stand by the uh, stand by the tire shop, bro. I’m pull up.” CS-2 said, “Alright, Cuz. I’ll see you in a minute.”

c. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversations, M PEARSON indicated

that he remembered CS-2; that M PEARSON needed to save CS-2's phone number; and that M PEARSON would meet with CS-2 for a narcotics transaction.

46. At approximately 11:30 a.m., CS-2 was searched for contraband or excess currency, with none found, and equipped with audio/video recording equipment. CS-2 was provided with \$300 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction. Due to a malfunction with the equipment, no audio/video was retrieved for this transaction.

47. At approximately 11:40 a.m., law enforcement surveillance near 106th and Wentworth Avenue observed Subject Vehicle 1 arrive in the area. Shortly thereafter, surveillance observed CS-2 enter the passenger side of Subject Vehicle 1, which then travelled to area of 120th and State Street. Law enforcement surveillance then observed M PEARSON exit Subject Vehicle 1 and enter the residence located at 17 East 120th Street ("Subject Residence 1").

48. At approximately 11:57 a.m., surveillance observed M PEARSON exit Subject Residence 1, and return to and enter Subject Vehicle 1. Subject Vehicle 1 then travelled to the area of 218 West 106th Street, at which time CS-2 exited Subject Vehicle 1, which departed the area.

49. Agents then met with CS-2 at a prearranged meeting location, at which time CS-2 provided law enforcement with a clear plastic bag containing 31 smaller zip lock bags each containing suspect heroin.

50. According to CS-2, CS-2 met with M PEARSON in Subject Vehicle 1 in the area of 106th and Wentworth. CS-2 explained that CS-2 entered the passenger

seat of Subject Vehicle 1 and informed M PEARSON that CS-2 wanted to purchase \$300 worth of heroin. CS-2 explained that M PEARSON stated he would have to pick up the heroin, and M PEARSON drove CS-2 to the area of State and 120th Street, where M PEARSON left the vehicle, walked east, returned, and reentered Subject Vehicle 1. With CS-2 still in Subject Vehicle 1, M PEARSON relocated to the area of 106th Street and Wentworth Avenue, retrieved a clear plastic bag containing narcotics from his sock, and handed same to CS-2 in exchange for \$300. CS-2 said that M PEARSON was apologetic to CS-2 for not remembering CS-2 and informed CS-2 to call ahead of time if CS-2 wished to purchase \$300 or more of heroin. M PEARSON further informed CS-2 that he had saved CS-2's phone number in his phone for future heroin purchases.

G. March 18, 2021, MICHAEL PEARSON Distributes 7.22 Grams of a Fentanyl and Heroin Mixture to CS-2

51. On or about March 17, 2021, at approximately 4:27 p.m., CS-2 had a recorded phone conversation with an unidentified male⁸, who was using Target Phone 1. During the call, CS-2 stated, "What's up Cuzzo, it's [CS-2], it's your boy, [CS-2]...I'm just giving you the heads up, I'm gonna shop big [purchase a large quantity of narcotics] tomorrow, so I wanted you to know...It'll probably be about 10:30, no about 11:00. Is that ok with you?" The unidentified male responded, "That's cool."

⁸ A prior affidavit in this investigation in support of an application for an order authorizing the interception of wire communications to and from Target Phone 1 indicated that M PEARSON was using Target Phone 1 during this phone call. Based on additional review of the phone call, law enforcement is unable to confirm that the individual using Target Phone 1 during this call was M PEARSON.

Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 told M PEARSON that CS-2 was interested in meeting the next day for a narcotics transaction.

52. On or about March 18, 2021, at approximately 11:00 a.m., CS-2 was searched for contraband or excess currency, with none found, and equipped with audio/video recording equipment. CS-2 was provided with \$300 in pre-recorded law enforcement funds to use as buy money for a narcotics transaction with M PEARSON.

53. At approximately 11:12 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, "What's up, Cuzzo? What you want me to do?" M PEARSON asked, "Where you at?" CS-2 replied, "I'm at the tire shop...the one on um, where I met you before on Wentworth [the tire shop near 106th and Wentworth, where CS-2 previously purchased narcotics from M PEARSON]." M PEARSON said "Alright, I'll be that way in like 15 minutes."

54. At approximately 11:16 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON asked, "What you trying to do [how much narcotics did CS-2 want to purchase] so I can make sure I got the count right [have enough narcotics]?" CS-2 responded, "I wanted to do 300 [\$300 worth of narcotics] again." PEARSON told CS-2 he was on his way.

55. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversations, CS-2 arranged to meet with M

PEARSON to purchase narcotics; M PEARSON asked what quantity of narcotics CS-2 wanted so that M PEARSON brought the right amount of narcotics to the transaction; and CS-2 indicated that CS-2 wanted to purchase \$300 worth of narcotics from M PEARSON.

56. At approximately 11:22 a.m., law enforcement surveillance observed M PEARSON arrive at Subject Residence 1 in Subject Vehicle 1, enter the residence, exit several minutes later, and reenter Subject Vehicle 1.

57. At approximately 11:26 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 stated, "I'm right here, in front of the tire shop." M PEARSON replied, "I'm on 119th and Wentworth, be there in five minutes."

58. Surveillance observed M PEARSON travel to the area of 106th Street and Wentworth. When M PEARSON arrived in the area, surveillance then witnessed CS-2 enter the passenger-side door of Subject Vehicle 1. Subject Vehicle 1 then drove to and parked in front of a residence on South Wentworth Avenue.

59. At approximately 11:35 a.m., surveillance agents observed CS-2 exit Subject Vehicle 1, which then departed the area.

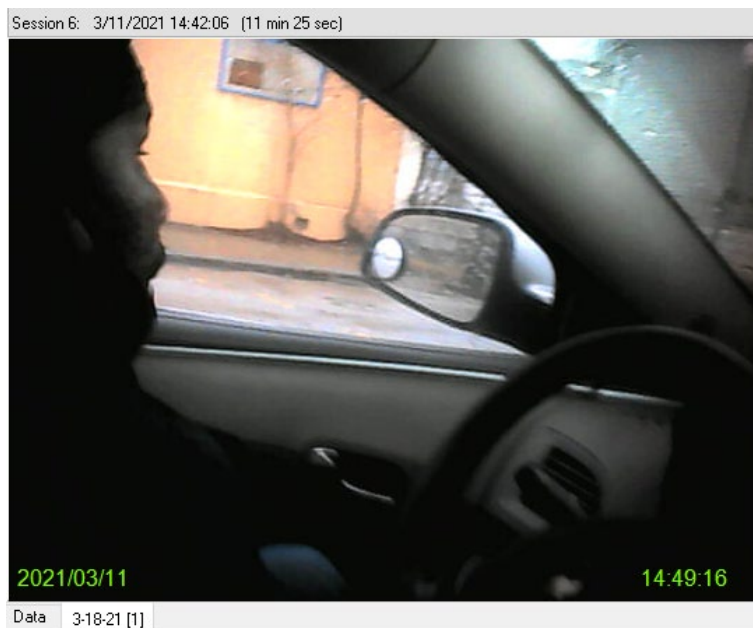
60. Agents met with CS-2 at a prearranged meeting location and CS-2 provided law enforcement with a clear plastic bag containing 29 smaller zip lock bags each containing what was later confirmed by DEA lab testing to be approximately 7.22 grams of a mixture of heroin and fentanyl.

61. At approximately 1:18 p.m. CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 told M PEARSON, "I just wanted to let you know that it was only 29 [bags of narcotics, instead of 30] in that pack." M PEARSON responded, "I'll give you one [additional bag of narcotics] but I'm for sure, I gave you 30, no problem. I'll owe you 31 [bags of narcotics] next time I see you bro." CS-2 told M PEARSON, "Next time we'll just have to count them [bags of narcotics] in front of each other you know what I mean." M PEARSON responded, "No problem, No problem, we'll count them right there."

62. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 informed M PEARSON that M PEARSON had provided only 29 bags of narcotics, instead of the agreed upon 30 bags of narcotics, and M PEARSON indicated that M PEARSON would provide an additional bag of narcotics to CS-2 the next time CS-2 purchased narcotics from M PEARSON.

63. According to CS-2, once inside Subject Vehicle 1, M PEARSON retrieved a clear plastic bag containing smaller zip lock bags with suspect heroin from inside M PEARSON's sock. M PEARSON then handed the bags to CS-2 in exchange for \$300. While inside the car, as captured by the CS audio/video recording equipment, CS-2 said, "I want to get it [narcotics] like in the raw [uncut], if that's possible." M PEARSON stated, "We ain't havin it in the raw." CS-2 asked, "What if I wanted to try and get a half or ounce, I'm talkin' big [large amount of narcotics], cause this is going too fast [CS-2 is selling the narcotics from M PEARSON quickly]." M PEARSON

said, “we got grams [of narcotics]...you can buy grams, we got grams for \$80 [per gram]. The video from CS-2’s recording device captures the side of PEARSON’s face⁹:



64. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 told M PEARSON that CS-2 was quickly selling the narcotics that CS-2 purchased from M PEARSON and asked whether CS-2 could purchase larger volumes of pure narcotics from M PEARSON. M PEARSON told CS-2 that M PEARSON could sell grams of narcotics to CS-2 for \$80 per gram.

H. March 30, 2021, MICHAEL PEARSON Distributes 4.8 Grams of a Fentanyl and Heroin Mixture to CS-2

65. On or about March 23, 2021, at approximately 4:22 p.m., CS-2 had a recorded phone conversation with an unknown male (“UM-1”), who was using Target

⁹ The transaction occurred on March 18, 2021, although the video recording from CS-2’s video (screen shot included) shows a date of March 11, 2021.

Phone 1. During the call, CS-2 said, “What’s up, Cuzzo, this [CS-2].” UM-1 stated, “This ain’t Cuzzo (M PEARSON).”¹⁰ CS-2 stated, “Me and him [M PEARSON] do have a kinda relationship [CS-2 had been purchasing narcotics from M PEARSON]” and “I wanted a half ounce [of narcotics], that’s why I said we [CS-2 and M PEARSON] had a relationship. He [M PEARSON] don’t want me to talk too much over the phone. I understand that but, that’s what I’m talking about.” UM-1 told CS-2, “I’ll have him call you bro.”

66. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 called Target Phone 1 looking to arrange a narcotics transaction with M PEARSON, but an unknown individual answered the phone. CS-2 indicated to the unknown individual that CS-2 had previously purchased narcotics from M PERSON and that CS-2 wanted to purchase a half ounce of narcotics.

67. At approximately 4:31 p.m., CS-2 had a recorded phone conversation with UM-1, who was using Target Phone 1. During the call, CS-2 said, “I’m really desperate to get an O-Z [ounce of narcotics], that’s what I really want, and I’m willing to pay....” UM-1 asked, “What you trying to spend, I’m sayin’?” CS-2 responded, “How much would I have to spend to get an ounce of you know?” UM-1 said, “I’ll call you right back, bro, with the number.”

¹⁰ Law enforcement understands “Cuzzo” to be M PEARSON based on information provided by CS-1 and CS-2 as well as the fact that M PEARSON refers to himself as “Cuzzo” on a recorded phone conversation, as described in this affidavit.

68. On or about March 24, 2021, at approximately 10:22 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, "I still wanted to do umm do that whole [ounce of narcotics], do that whole if possible." M PEARSON responded, "Yeah this Cuzzo this Cuzzo. Yeah I'm gunna count them [bags of narcotics] in front of you, its gunna be, I owe you one, and the 30." CS-2 responded, "Ok, but what about that whole [ounce of narcotics]." M PEARSON said, "We ain't got the whole thing [ounce of narcotics], we got, we only got the things [smaller bags of narcotics] we've been doing."

69. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 informed M PEARSON that CS-2 was interested in purchasing an ounce of narcotics from M PEARSON. M PEARSON related that he owed CS-2 an additional bag of narcotics from their last transaction and that he was not selling ounces of narcotics, but that he could provide smaller bags of narcotics.

70. At approximately 10:30 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON said, "Hey look let me tell you this now, [CS-2]. I ain't goin to do too much details, we got grams [of narcotics] for 80 if you wanna mix it yourself. So, I'm sayin' four [grams] times 8 [80] that's 320 [\$320 for four grams of narcotics]. You buying 300 in the bags, you see what I'm sayin'?" CS-2 affirmed. M PEARSON responded, "If you want to buy, buy yourself and find your own shit [additives] to stretch it [the narcotics] out with, you can do that. You know what I'm sayin' we talked this when I had you in the

car last time.” CS-2 agreed. M PEARSON continued, “Yeah just call me say you on your way, so, just just give me, ahh, 310 [\$310], because I owe you 10 [\$10] for one of the things [bags of narcotics] I was short and I’m gunna give you the four grams.” CS-2 replied, “Yeah Yeah, ok I’ll probably do five [five grams of narcotics], 500 [\$500] if that’s ok with you.” M PEARSON responded, “Ahh no...no no no, if you want to do five gram, that’s [\$]310 that’s 390 [\$390], that’ll be 390 [\$390] for five [grams of narcotics].” CS-2 affirmed.

71. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, M PEARSON informed CS-2 that M PEARSON could sell grams of narcotics to CS-2 for \$80 per gram, and that four grams of narcotics would cost \$320. M PEARSON further explained to CS-2 that M PEARSON could sell grams of un-cut heroin to CS-2 and that CS-2 could add his own additives or cuts to the heroin. CS-2 indicated that he wanted to purchase five grams of narcotics, and M PEARSON indicated that it would cost \$390 because M PEARSON owed CS-2 narcotics from their prior transaction.

72. On or about March 30, 2021, at approximately 12:30 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 told M PEARSON that CS-2 would be ready to meet in five minutes. M PEARSON said, “Yeah, I’m going to need like ten [minutes], because I’m chasing’ [servicing] like two [narcotics] customers.” M PEARSON asked, “What you trying to do the five [grams of heroin]?” CS-2 affirmed. M PEARSON asked, “The five soft ones we talked about?” CS-2 affirmed. M PEARSON said, “Yeah, I’m finna go,

just give me 15 [minutes], I need to go put it [the narcotics] together right fast, I need to go, cause I didn't get a chance to go do 'em. I'm just going to weigh five [grams] of them, and then I'm going to call you when to go right there, that's all I'm trying to say." CS-2 agreed.

73. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, M PEARSON told CS-2 that M PEARSON needed additional time before they met because M PEARSON was distributing narcotics to other customers and because M PEARSON needed to get the five grams of narcotics that CS-2 had requested.

74. At approximately 12:35 p.m., CS-2 and CS-3 were searched for contraband or excess currency, with none found, and CS-2 was equipped with audio/video recording equipment. CS-2 was provided with \$390 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction. Due to a malfunction with the equipment, no audio/video was retrieved for this transaction.

75. At approximately 12:41 p.m., surveillance observed M PEARSON arrive at Subject Residence 1 in Subject Vehicle 1. M PEARSON parked Subject Vehicle 1 in front of Subject Residence 1, exited the car, and entered the residence, before exiting minutes later and reentering Subject Vehicle 1. M PEARSON then travelled to the area of 106th and Wentworth Avenue.

76. At approximately 12:46 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, M PEARSON said, "I'm finna be heading your way, bro, so you can go up there in like ten minutes."

CS-2 responded, "Ok, cool. I got my man [CS-3] with me." At approximately 1:01 p.m., M PEARSON, using Target Phone 1, called CS-2 and told CS-2, "walk down like you walkin toward 106th; I'm already parked."

77. At approximately 1:03 p.m. surveillance observed CS-2 enter the passenger side door of Subject Vehicle 1. CS-3 remained in a CS vehicle. At approximately 1:05 p.m., surveillance observed CS-2 exit Subject Vehicle 1, at which time Subject Vehicle 1 exited the area.

78. Shortly thereafter, law enforcement met with CS-2 and CS-3 at a predetermined meet location at which time CS-2 provided law enforcement with a clear plastic bag containing what was later confirmed by DEA lab testing to be 4.8 grams of a mixture of heroin and fentanyl, which CS-2 indicated had been sold to him by M PEARSON.

79. According to CS-2, after CS-2 entered Subject Vehicle 1, M PEARSON handed CS-2 the bag of narcotics in exchange for \$390. CS-2 indicated that CS-2 also attempted to introduce CS-3 to M PEARSON, but that M PEARSON said he had other customers waiting for him.

I. April 6, 2021, MICHAEL PEARSON Distributes 10.038 Grams of Fentanyl to CS-2

80. On or about April 1, 2021, at approximately 12:45 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 told M PEARSON, "I'd like put, um, order in [purchase] for ten [grams of narcotics], um, just give me a price." M PEARSON responded, "Ah, that's eight, eight, eight, times ten, that's eight...eight times ten bro, eight times ten, naw

I'll do 75 [\$75 per gram] for you, bro, just calculate it up, calculate it up, I can't talk on the phone, 75 times ten." M PEARSON told CS-2, "text me in the morning...so I can prepare for it [prepare the narcotics]."

81. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 informed M PEARSON that CS-2 was interested in purchasing ten grams of narcotics, and M PEARSON indicated that the price would be \$75 per gram. M PEARSON also informed CS-2 to let M PEARSON know when CS-2 wanted to purchase the narcotics so that M PEARSON could prepare the narcotics.

82. On or about April 6, 2021, at approximately 8:35 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, "I just wanted to come see you today...about 11ish...I'm gonna get them ten [grams of narcotics] from you, is that cool with you?" M PEARSON said, "Yeah, that's cool with me."

83. At approximately 12:47 p.m., and 12:54 p.m., CS-2 had recorded phone conversations with M PEARSON, who was using Target Phone 1. During the call at 12:47 p.m., CS-2 asked, "I'll meet you at the tire shop?" M PEARSON replied, "No, we gonna meet somewhere else...meet me at the Currency Exchange on 111th and Michigan." During the call at 12:54 p.m., M PEARSON confirmed, "You said the ten [grams of narcotics] right?" CS-2 responded, "Yes sir."

84. At approximately 1:00 p.m., CS-2 and CS-3 were searched for contraband or excess currency, with none found, and CS-2 was equipped with

audio/video recording equipment. CS-2 was provided with \$750 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

85. At approximately 1:01 p.m., surveillance observed M PEARSON park Subject Vehicle 1 outside of Subject Residence 1 and enter the residence. At approximately 1:07 p.m., surveillance observed M PEARSON exit Subject Residence 1, reenter Subject Vehicle 1, and drive to the area of the Currency Exchange at 111th and Michigan.

86. At approximately 1:10 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1, during which M PEARSON told CS-2 that he was pulling up to the meet location.

87. At approximately 1:11 p.m., surveillance observed Subject Vehicle 1 arrive and park at the Currency Exchange and observed a black female enter and then exit Subject Vehicle 1.

88. At approximately 1:12 p.m., law enforcement observed CS-2 enter Subject Vehicle 1 via the passenger-side door, while CS-3 remained in the CS vehicle. Approximately two minutes later, surveillance observed CS-2 exit Subject Vehicle 1 and depart the area.

89. Shortly thereafter, law enforcement met with CS-2 at a predetermined meeting location where CS-2 provided law enforcement with a clear plastic bag containing what was later confirmed by DEA lab testing to be 10.038 grams of fentanyl.

90. According to CS-2, after entering Subject Vehicle 1, M PEARSON provided CS-2 with the bag of narcotics in exchange for \$750. According to the CS audio/video recording equipment, while in the vehicle, CS-2 stated, “750 [\$750]...shit [narcotics] is goin [selling] fast...it’s goin quick, it’s goin good.” M PEARSON stated, “It’s ten [grams of narcotics].”

91. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 confirmed that he brought \$750, and M PEARSON confirmed that he brought ten grams of narcotics.

J. May 6, 2021, MICHAEL PEARSON Distributes 9 Grams of Fentanyl to CS-2

92. On or about April 12, 2021, at approximately 10:59 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, “I’m gonna get 30 [grams of narcotics]. How much for that?” M PEARSON responded, “You got to do the math man, look, look 75 times 30, just do the math, bro.” CS-2 asked, “Ok alright so how you want me to do it? You want me to call you a day ahead of time or what?” M PEARSON responded, “Yeah, yeah, so I can have it [the narcotics] together for you [prepared]. What day you think you probably going to be?” CS-2 stated, “probably in the next couple of days, next day or two.”

93. On or about April 30, 2021, at approximately 8:30 a.m., CS-2 had a recorded phone conversation with an unknown individual using the alias “Big Man,” who was using Target Phone 1. During the call, CS-2 said CS-2 was “Trying to get 50 of them 50 grams alright.” Big Man said, “The less talking’ we do on this phone the

better.” CS-2 responded, “OK, what you want me to, who should I ask for?” Big Man responded, “This is Big Man bro I gunna answer the phone.” CS-2 said CS-2 would call back in a couple days.

94. On or about May 5, 2021, at approximately 8:08 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, “Hey I gunna try and get ten, ten umm, ten grams, umm in a couple of days, is that cool with you?” M PEARSON replied, “I’m take your number down bro I’m call you from another number thou, cuz you got up with [attempted to purchase narcotics from] Big Man he know he not suppose to got up with [sell narcotics to] you, what he do.” CS-2 said, “we didn’t do anything, we didn’t, me and Big...we didn’t do nothing.” M PEARSON also said, “I’m take this number down [save CS-2’s number] and I’m call you from another number just, just answer the phone.”

95. Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 indicated that CS-2 wanted to purchase ten grams of narcotics from M PEARSON, and M PEARSON told CS-2 that PEARSON knew that CS-2 attempted to purchase narcotics from a member of the organization known as “Big Man” and that M PEARSON told Big Man that Big Man was not supposed to sell narcotics to M PEARSON’s customers. CS-2 assured M PEARSON that CS-2 did not purchase any narcotics from Big Man, and M PEARSON indicated that he was going to call CS-2 from a different phone number

96. On or about May 5, 2021, at approximately 8:11 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 said, "I'ma be coming, I got the money together so I'ma come tomorrow, is that cool?" M PEARSON replied, "Alright, I'll be waiting on you, I'ma call you from a different number though."

97. On or about May 6, 2021, at approximately 8:15 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 told M PEARSON that CS-2 was coming to meet him for narcotics around 10:00 or 10:30 a.m. M PEARSON stated, "Just call me I'll be ready." M PEARSON replied, "Ok, alright."

98. At approximately 10:15 a.m., CS-2 was searched for contraband or excess currency, with none found, and equipped with audio/video recording equipment. CS-2 was provided with \$750 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

99. At approximately 10:55 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Target Phone 1. During the call, CS-2 stated, "I'm getting ready to be at the tire shop." M PEARSON replied, "No I don't want you to be by the tire shop, go to 107th and State" and "It's a store right there...a convenient store." M PEARSON also stated, "I'm finna go grab it [the narcotics], I'll be there in like 15 right behind you." CS-2 replied, "Ok, I'm ready."

100. At approximately 11:00 a.m., CS-2 arrived in the area of 108th Street and State Street.

101. At approximately 11:03 a.m., law enforcement observed Subject Vehicle 2 at Subject Residence 1. M PEARSON exited Subject Vehicle 2 and entered Subject Residence 1. A short time later, M PEARSON exited Subject Residence 1, entered Subject Vehicle 2, and drove away east on 120th Street, north on Michigan Avenue, and then west on 107th Street.

102. At approximately 11:11 a.m., Subject Vehicle 2 parked at approximately 10637 S. State Street. CS-2 was observed walking to and entering Subject Vehicle 2.

103. At approximately 11:15 a.m., CS-2 exited Subject Vehicle 2 and Subject Vehicle 2 departed the area.

104. Agents then met with CS-2 at a prearranged meeting location, at which time CS-2 was searched for contraband or excess currency with none found other than the purchased narcotics. CS-2 provided law enforcement with a clear plastic bag containing what was later confirmed by lab testing to be approximately 9 grams of fentanyl.

105. According to CS-2, once inside Subject Vehicle 2, M PEARSON reached under front passenger seat and retrieved a clear knotted plastic bag with a brown chunk and handed the bag to CS-2. In return, CS-2 provided \$675 of law enforcement funds to M PEARSON. According to CS-2 and CS-2's covert audio recording, M PEARSON stated, "Give me 675 [\$675] and keep the other 75 [\$75] cause I got 9 [grams of narcotics] instead of the 10 [grams]...Take \$75 off and that's 675." CS-2 said "I tried to deal with Big Man" and M PEARSON said, "And that shit not right. Look, when I saw you talkin to him, that's why I'ma call you from my personal

number...I'ma give you a number...and we'll communicate through that...312-XXX-4685 ("Subject Phone 2)."

K. May 21, 2021, MICHAEL PEARSON and Individual A Distribute 20.2 Grams of a Fentanyl, Heroin, and Methamphetamine Mixture to CS-2

106. On or about May 20, 2021, at approximately 10:23 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-2 told M PEARSON that CS-2 "wanted to get 20 [grams of heroin]." PEARSON asked, "alright when are you talkin about bro?" CS-2 responded, "I'm talkin about Friday in between 11 and 12." PEARSON stated, "Alright 11:30 bro Friday."

107. On or about May 21, 2021, at approximately 10:52 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON told CS-2, "I aint gunna be there...because I had to go take my grand baby to the emergency room." CS-2 asked, "can you send somebody else?" M PEARSON stated, "let me try to see if I can send somebody else real fast."

108. Shortly thereafter, law enforcement met with CS-2 at which time CS-2 was searched for contraband with none found. CS-2 was then provided with approximately \$1,500 in pre-recorded law enforcement funds and equipped with covert audio and video recording equipment.

109. At approximately 11:02 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON asked, "You know where 108th and Michigan at the AP Deli...There's a restaurant

right there called AP Deli.” CS-2 said, “AP Deli ok.” M PEARSON stated, “Alright go on over that way, I’m finna slide over there, just call me when you get right there.” CS-2 said, “Ok cool, thanks, man.”

110. At approximately 11:20 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-2 confirmed that CS-2 was arriving in the area, stating, “I’m on 111th I just got off 111th, I’m going there.”

111. At approximately 11:22 a.m., surveillance observed CS-2 arrive in the area of 108th Street and Michigan Avenue.

112. At approximately 11:24 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-2 stated, “I’m in front on the deli.” M PEARSON asked, “What color you got on?” CS-2 responded, “orange gym shoes and a blue shirt.” M PEARSON stated, “just go in there [inside the AP Deli], you know that’s 15 that 1500 [the price would be \$1,500] so just go in there and order a sandwich and they finna pull up.”

113. At approximately 11:30 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON stated, “he should be pullin up in like 5 6 minutes, he getting off the expressway.”

114. At approximately 11:31 a.m., surveillance observed CS-2 enter the aforementioned deli. At approximately 11:49 a.m., surveillance observed CS-2 exit the deli.

115. At approximately 11:52 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON asked, "Did you see him?" CS-2 confirmed. A few minutes later, at approximately 11:58 a.m., CS-2 had another recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON asked, "You gave him 15 [\$1,500], right?" CS-2 replied, "Yeah, yep, I gave it all to him, only thing was missing was for the sandwich." Based on my training experience, and knowledge of this investigation, I believe that during the above conversation, M PEARSON asked for confirmation that CS-2 had paid \$1,500 for the narcotics, and CS-2 confirmed that he paid \$1,500 minus the cost of a sandwich CS-2 purchased in the deli.

116. Following the meeting, agents met with CS-2 at a prearranged meeting location, at which time CS-2 was searched for contraband or excess currency with none found other than the purchased narcotics. CS-2 provided law enforcement with a clear plastic bag containing what was later confirmed by lab testing to be approximately 20.2 grams of a mixture of heroin, fentanyl, and methamphetamine.

117. According to CS-2, once CS-2 entered the restaurant, CS-2 was approached by an individual ("Individual A"). According to CS-2, the individual provided CS-2 with a plastic bag containing narcotics in exchange for \$1,500 (less the cost of a sandwich at the restaurant).

L. June 2, 2021, MICHAEL PEARSON Distributes 50.5 Grams of a Fentanyl and Heroin Mixture to CS-2

118. On or about May 31, 2021, at approximately 8:03 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2.

During the call, CS-2 asked, "This my man, Cuzzo?" M PEARSON said, "yeah." CS-2 said, "I wanna hook up with you Wednesday [June 2, 2021] 11:30. Is that ok?" M PEARSON responded, "Yeah, that's ok, what you talkin bout?" CS-2 said, "I wanna get 50 [grams of narcotics]." M PEARSON said, "Just call me at 10:00 to confirm it."

119. On or about June 2, 2021, CS-2 had a number of recorded phone conversations with M PEARSON, who was using Subject Phone 2. In particular:

a. At approximately 10:26 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2, in order to confirm the transaction. During the call, CS-2 stated, "I'll be there around 11:30. Is that ok?" M PEARSON replied, "Yeah, just call me when you coming up so I can tell you where to meet me at."

b. At approximately 11:00 a.m., CS-2 had a recorded phone conversation with PEARSON, who was using Subject Phone 2. During the call, M PEARSON said, "The same place we met last time, I mean, 108th, the corned beef place." CS-2 responded, "The corned beef place? Okay."

c. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversations, CS-2 arranged to meet M PEARSON at the same deli on 108th and Michigan where CS-2 previously purchased narcotics on May 21, 2021, in order to purchase additional narcotics from M PEARSON.

120. At approximately 11:02 a.m., CS-2 and CS-3 arrived at a predetermined meet location and were searched for contraband or excess currency, with none found,

and CS-2 was equipped with audio/video recording equipment. CS-2 was provided with \$3,750 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

121. At approximately 11:05 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-2 stated, "I'm 15-20 minutes out right now." M PEARSON said, "You know the ticket [price of narcotics], 37-50 [\$3,750], right?" CS-2 responded, "yeah."

122. At approximately 11:14 a.m., surveillance observed CS-2 arrive at the meet location.

123. At approximately 11:36 a.m., surveillance observed Subject Vehicle 2 arrive at and park in the area of the meet location.

124. At approximately 11:36 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON instructed CS-2 to drive to a nearby bank on the 117th block of South Halsted.

125. Surveillance subsequently observed CS-2 drive to the area of the bank. At the same time, surveillance observed Subject Vehicle 2 drive to Subject Residence 1.

126. Shortly thereafter, law enforcement observed Subject Vehicle 2 depart from Subject Residence 1 and travel to the area of the aforementioned bank.

127. At approximately 11:57 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON told CS-2, "Get out the car and walk down the block, on the bank block...toward Union

not towards Halsted, the other way, there's gonna be somebody right there on the porch on the corner, just give 'em the money I'm right here watching."

128. At approximately 11:57 a.m., surveillance observed CS-2 and CS-3 walking west on 117th Place towards Halsted.

129. At approximately 12:05 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON told CS-2 that law enforcement was in the area and instructed CS-2 to stay put. In particular, M PEARSON stated, "I see y'all walkin, we tryin to watch these police, man... Just chill out down that way, I see y'all...it's a police in the alley...Just stay right there on that side. Just, just chill out down there...." Surveillance observed CS-2 and CS-3 subsequently return to the CS vehicle.

130. At approximately 12:16 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON instructed CS-2 to walk east on 117th Place by himself and enter a vehicle where he would provide the money for the narcotics and M PEARSON told CS-2 that M PEARSON would be watching. In particular, M PEARSON stated, "C'mon walk down by yourself. I saw you and Big Boy [CS-3]. Come back on the other side where you was, there's gonna be a car right there, just jump in the car and count the money and the shit right there. I'm right here watching...Tell dude [CS-3] to sit in the car."

131. At approximately 12:20 p.m., surveillance observed CS-2 enter a gray vehicle parked in the vicinity of 117th Place and Union. As detailed below, according to CS-2, an unknown male was already present in the vehicle.

132. At approximately the same time, CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON told CS-2, "Put your phone on speaker, let me holler at my man." M PEARSON then asked an unknown male, "Hey Nate is everything good?" The unknown male responded, "We countin [the money for the narcotics] now." M PEARSON stated, "hurry up, bro."

133. At approximately 12:25 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON asked, "Y'all still countin [the money for the narcotics]?" CS-2 said, "yeah." PEARSON then stated, "Put the phone on the speaker" and asked, "Is everything good, Nate?" The unknown male in the vehicle said, "All there." M PEARSON then instructed CS-2, "Get out. Right there by that building you at, that...abandoned building right there, look over the fence, it's [the narcotics] in the bag...Right there, that building right there, get out...on your right, right there where the gate changed up...look over the fence...it's a potato chip bag right there. Look over the fence. You see it?" CS-2 replied, "yeah."

134. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2, at the direction of M PEARSON, placed his phone on speaker, so that M PEARSON could check with the unknown male whether CS-2 had provided all the money for the narcotics. The unknown male then informed M PEARSON that CS-2 had brought all the money, after which, M

PEARSON told CS-2 to get out of the vehicle and walk to an abandoned building where CS-2 would find the narcotics in a potato chip bag by the fence.

135. At approximately 12:26 p.m., surveillance observed CS-2 exit the vehicle and walk to a residence on the 700 block of West 117th Place where CS-2 was observed retrieving an item from the fence. CS-3 remained in the CS vehicle.

136. At approximately 12:26 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-2 told M PEARSON, "I'm good." M PEARSON responded, "alright," and CS-2 stated, "good lookin out, man." Surveillance then observed CS-2 walk back to the CS vehicle and depart the area.

137. Agents subsequently met with CS-2 and CS-3 at a prearranged meeting location, at which time, after being searched for contraband with none found other than the purchased suspect heroin, CS-2 provided law enforcement with a potato chip bag containing what was later confirmed by lab testing to be approximately 50.5 grams of a mixture of heroin and fentanyl.

138. According to CS-2, after entering the gray vehicle he provided an unknown black male with the law enforcement funds. This individual then counted the money that CS-2 had provided. CS-2 said M PEARSON then instructed CS-2 to walk to an abandoned building and retrieve the heroin from inside a potato chip bag near the fence. CS-2 explained that CS-2 had done so.

M. July 16, 2021, MICHAEL PEARSON and JAMIE PEARSON Distribute 49.8 Grams of a Fentanyl and Heroin Mixture to CS-2 and CS-3

139. On or about July 6, 2021, at approximately 10:01 a.m., CS-2 had a recorded phone conversation with M PEARSON, who was using a restricted phone number.¹¹ During the call, M PEARSON said, “What up [CS-2]...It’s Cuzzo, what up?...I ain’t heard nothing from you bro, I ain’t heard nothing from you what’s happening?” CS-2 responded, “I’ve been calling, I called you several times um last week...I spent a bunch of money [on narcotics] last week.” M PEARSON asked, “With somebody else?” CS-2 said, “I was thinking they was with you...To make a long story short, I got 50 [grams of narcotics], 50, no I mean um, 20 [grams of narcotics], 20 from him, umm and that was last week.” M PEARSON then said, “Just tell me the days you might be thinkin you ready and I’m a call you bro.” Later in the call, M PEARSON asked, “So when you think you’ll be ready [to purchase narcotics]?” CS-2 replied, “Next weekend...but what number should I call to get you?” PEARSON responded, “312-XXX-4685 [Subject Phone 2]. That number...Call me Thursday and confirm it [the narcotics order].”

140. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, M PEARSON asked CS-2 why he hadn’t

¹¹ Law enforcement conducted a voice comparison between the voice of M PEARSON, as recorded during in-person meetings and over Target Phone 1 and Subject Phone 2, and the voice of the user of the restricted phone number, and confirmed that they were the same person. A prior affidavit in this investigation in support of an application for an order authorizing the interception of wire communications to and from Target Phone 1 indicated that M PEARSON was using Subject Phone 2 during this phone call. Based on additional review of the recorded call, law enforcement has determined that the call was made from a restricted phone number.

made any narcotics purchases recently. CS-2 explained that CS-2 had made a purchase of 20 grams of narcotics from another individual. M PEARSON asked CS-2 when CS-2 would be ready for another purchase, and CS-2 told M PEARSON that CS-2 thought CS-2 would be ready the next weekend. M PEARSON instructed CS-2 to call M PEARSON at “312-XXX-4685” (Subject Phone 2) when CS-2 was ready to purchase the narcotics.

141. On or about July 8, 2021, at approximately 2:38 p.m., CS-2 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-2 said, “Let me speak to Cuzzo.” M PEARSON said, “This, this him, what’s up?” CS-2 stated, “I’m a give my boss [CS-3] your telephone number...cuz he wanna do it big [purchase a large volume of narcotics]...My boss, Big Man, the same guy that was with me [at a prior transaction with M PEARSON]...I’m a give him your number...So he will be calling you cuz we wanna try to do it big okay?” Later in the call, M PEARSON stated, “Just text me his number and I’m a call him from another number.”

142. Based on my training, experience, and knowledge of this investigation, I believe that during the above conversation, CS-2 told M PEARSON that CS-2’s “boss” [CS-3] wanted to make a large purchase of narcotics from M PEARSON and that CS-2 would give M PEARSON’s phone number to CS-3 so that CS-3 could contact M PEARSON. CS-2 referred to his boss as “Big Man.” M PEARSON instructed CS-2 to text a phone number for CS-3 to M PEARSON.

143. At approximately 2:42 p.m., CS-2 sent a text message to M PEARSON at Subject Phone 2 providing M PEARSON with a telephone number for “Big Man.”

144. At approximately 2:51 p.m., CS-3 had a recorded phone conversation with M PEARSON, who was using telephone number 312-XXX-9966 (“Subject Phone 3”).¹² During the call, M PEARSON said, “What’s going on Big Man?...It’s Cuzzo.” CS-3 stated, “I’m trying to slide out there uh, about probably uh, next Friday or so Friday.” M PEARSON stated, “Text me the number [quantity of narcotics] you know what I’m saying and we’ll go from there. I don’t like doing all that [discussing narcotics] on the phone, it’s all good though.”

145. On or about July 13, 2021, at approximately 10:22 a.m., CS-3 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, M PEARSON stated, “What’s going on Big Man, it’s Cuzzo.” CS-3 stated, “I’m showing up...on Friday, we’ll go on and get down and uh, get on top of this [conduct the narcotics transaction on Friday].” M PEARSON said, “Ok, alright, I’ll give, I’ll give you a call Thursday then to get you know what’s the order [of narcotics] and whatever.”

146. On or about July 15, 2021, at approximately 11:03 a.m., CS-3 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2. During the call, CS-3 said, “I’m going out that way ah tomorrow,” and M PEARSON again asked CS-3 to “text me the order [of narcotics].”

¹² Law enforcement conducted a voice comparison between the voice of M PEARSON, as recorded during in-person meetings and over Target Phone 1 and Subject Phone 2, and the voice of the user of Subject Phone 3, and confirmed that they were the same person.

147. At approximately 11:14 a.m., CS-3 received a text message from M PEARSON, who was using Subject Phone 2, which read, "Text the order." CS-3 responded, "Imma slide [order] on 50th [50 grams of heroin] and State." M PEARSON responded, via text, "Okay cool."

148. On or about July 16, 2021, at approximately 10:00 a.m., CS-2 and CS-3 arrived at a predetermined meet location and were searched for contraband or excess currency, with none found, and CS-2 and CS-3 were equipped with audio/video recording equipment. CS-2 was also provided with \$3,750 in pre-recorded law enforcement funds to use as buy money for the narcotics transaction.

149. At approximately 10:23 a.m. and 10:29 a.m., CS-3 had recorded phone conversations with M PEARSON, who was using Subject Phone 2.

a. During the call at approximately 10:23 a.m., M PEARSON said, "We going meet by that candy store right off the expressway on 71st." CS-3 replied, "Ok cool." made plans to meet with CS-3 at a mall on 119th Street.

b. During the call at approximately 10:29 a.m., M PEARSON asked, "You wanna meet up over there by 119th and the mall...over there Marshfield Plaza by the Jewel's." CS-3 responded, "ok, cool." M PEARSON asked, "You said like 45 minutes or an hour?" CS-3 responded, "Yeah somewhere up in there..."

150. Between 10:57 a.m. and 11:22 a.m., CS-3 had multiple recorded phone and text conversations with M PEARSON, who was using Subject Phone 2, regarding the vicinity of each to the planned meet location. In particular:

a. At approximately 10:57 a.m., CS-3 had a recorded text conversation with M PEARSON, who was using Subject Phone 2, in which CS-3 wrote, "10min out."

b. At approximately 10:59 a.m., CS-3 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2, in which M PEARSON stated, "I'm like 15 [minutes] behind you."

c. At approximately 11:10 a.m., law enforcement observed the CS vehicle arrive in the area of the planned meet location, near 119th and S. Marshfield Avenue in Chicago.

d. At approximately 11:11 a.m., CS-3 had a recorded text conversation with M PEARSON, who was using Subject Phone 2, in which CS-3 wrote, "Blue whip [car] in front of the giant beauty supply store." At 11:12 a.m., M PEARSON responded via text, "Okay."

e. At approximately 11:16 a.m., CS-3 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2, in which M PEARSON stated, "I'll be there in like 10 minutes."

f. At approximately 11:22 a.m., CS-3 had a recorded phone conversation with M PEARSON, who was using Subject Phone 2, in which M PEARSON asked, "You in the blue truck?" CS-3 responded, "No, I'm sitting here in the uh blue Nissan." M PEARSON said, "Alright."

151. At approximately 11:25 a.m., law enforcement observed an individual subsequently identified as JAMIE PEARSON arrive in the meet area in a green Ford SUV, exit the vehicle, walk to the CS vehicle, and enter.

152. Based on a video recording from inside the CS vehicle, after entering the vehicle, J PEARSON stated, “Cuzzo [M PEARSON], right?... 37-5 [\$3,750], right?” Based on my training, experience, and familiarity with this investigation, I believe that J PEARSON was confirming that CS-2 and CS-3 had communicated with M PEARSON (“Cuzzo”) about the narcotics deal and that they had brought \$3,750 to purchase the narcotics.

153. Shortly thereafter, surveillance observed J PEARSON exit the CS vehicle, return to the green Ford, retrieve a plastic bag, and place that plastic bag by a tree near his vehicle. Surveillance then observed J PEARSON walk back to the CS vehicle and re-enter, at which time the CS vehicle relocated next to J PEARSON’s green Ford.

154. Based on a video recording from inside the CS vehicle, after re-entering the CS vehicle, J PEARSON stated, “Right over there. Grab it [the narcotics] out the bushes on the side of the car.”

155. At approximately 11:26 a.m., surveillance observed CS-2 exit the CS vehicle, retrieve the plastic bag from nearby the tree, and re-enter the CS vehicle. Based on a video recording from inside the CS vehicle, as CS-2 re-entered the CS vehicle, J PEARSON stated, “It’s [the narcotics are] in the bread.” Surveillance then observed J PEARSON exit the CS vehicle, re-enter the Ford, and depart the area.

156. Law enforcement maintained surveillance on J PEARSON's vehicle as it departed and, at approximately 11:41 a.m., law enforcement performed an investigatory stop, and confirmed J PEARSON's identity. An image from officer BWC is included below, along with images of J PEARSON inside the CS vehicle captured by the CS recording devices:



157. At approximately 11:29 a.m., CS-3 had a recorded phone conversation with M. PEARSON, who was using Subject Phone 2. During the call, M PEARSON confirmed that CS-3 was satisfied with the transaction stating, "It's [the narcotics are] in the food [the bread dropped off by J PEARSON], you good?"

158. Agents subsequently met with CS-2 and CS-3 at a prearranged meeting location, at which time, after being searched for contraband with none found other than the purchased suspect heroin, CS-3 provided law enforcement with a plastic bag containing a loaf of bread and what was later confirmed by lab testing to be approximately 49.8 grams of a mixture of heroin and fentanyl.

159. According to CS-3, when J PEARSON entered the CS vehicle, CS-3 showed J PEARSON the money. J PEARSON then exited the CS vehicle, returned to

a green Ford, retrieved a bag, and placed it by a tree. J PEARSON then walked back to the CS vehicle and entered, instructing CS-2 and CS-3 that the drugs were hidden in the bread inside the white bag J PEARSON had placed by the tree. CS-3 explained that J PEARSON had instructed them to pull closer to the Ford. Once they did, CS-2 explained that CS-2 exited the CS vehicle and retrieved the plastic bag. CS-3 said that CS-3 provided J PEARSON with the law enforcement funds.

CONCLUSION

160. Based on the foregoing, I submit that there is probable cause to believe that:

a. On or about February 4, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, MICHAEL PEARSON, also known as “Cuzzo,” and KEVIN WARE, also known as “Twin” and “Hustle,” did knowingly and intentionally distribute a controlled substance, namely a quantity of a mixture and substance containing a detectable amount fentanyl and heroin, in violation of Title 21, United States Code, Section 841(a)(1).

b. On or about July 16, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, MICHAEL PEARSON, also known as “Cuzzo,” and JAMIE PEARSON did knowingly and intentionally distribute a controlled substance, namely 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, and a quantity of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

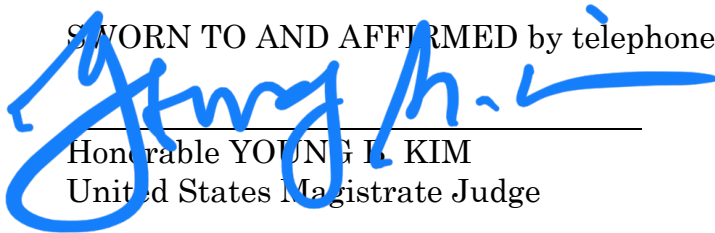


MASUD HAIDARI

Task Force Officer, Drug Enforcement
Administration

by


SWORN TO AND AFFIRMED by telephone on July 26, 2023.



Honorable YOUNG B. KIM

United States Magistrate Judge