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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DARRIN PULPHUS,  
SHAWN TURNER,  
DAVID BOWDEN,  
DESHAWN WALLS,  
    also known as "Shake,"  
DARRELL WILLIAMS,  
    also known as "D-Ski,"  
LAWRENCE JOHNSON,  
RICHARD HOWARD,  
CURTIS POPE,  
ROME PERKINS, and  
EDWARD HUMPHREY

CASE NUMBER:  
**UNDER SEAL**

**CRIMINAL COMPLAINT**

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

**Count One**

From on or about February 7, 2019 to on or about April 24, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Darrin PULPHUS, Shaun TURNER, David BOWDEN, Deshawn WALLS, Derrell WILLIAMS, Lawrence JOHNSON, and Richard HOWARD, the defendants, violated:

*Code Section*

Title 21, United States Code, Section  
841(a)(1) and 846.

*Offense Description*

conspired to possess with intent to distribute and distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

### **Count Two**

On or about April 24, 2019, at Chicago, in the Northern District of Illinois, CURTIS POPE violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Knowingly and intentionally distributed a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

### **Count Three**

On or about February 9, 2019, at Chicago, in the Northern District of Illinois, ROME PERKINS violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Knowingly possessed with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine.

### **Count Four**

On or about April 10, 2019, at Chicago, in the Northern District of Illinois, LAWRENCE JOHNSON violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 924(c)	Used a firearm in furtherance of a drug trafficking offense.

### **Count Five**

On or about April 11, 2019, at Chicago, in the Northern District of Illinois, EDWARD HUMPHREY violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Knowingly possessed with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

\_\_\_\_\_  
Madison Johnson  
Special Agent, Bureau of Alcohol, Tobacco,  
Firearms & Explosives (ATF)

Sworn to before me and signed in my presence.

Date: September 17, 2019

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

JEFFREY T. GILBERT, U.S. Magistrate Judge  
*Printed name and Title*

**AFFIDAVIT**

I, Madison Johnson, being duly sworn, state as follows:

1. I am with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), and have been so employed since November 2015 years. My current responsibilities include the investigation of narcotics trafficking offenses. As part of my duties as an ATF Special Agent, I investigate criminal violations relating to federal firearms offenses, including offenses relating to the illegal sale and transfer of firearms.

2. I have also been involved in the execution of search warrants, arrests, and consent searches related to violations of federal law. These investigative actions have covered the searches of locations such as vehicles, residences, and businesses. Evidence recovered in these searches has included quantities of various controlled substances, large quantities of United States currency, drug packaging and paraphernalia, and other evidence. I have participated in the debriefing and questioning of numerous defendants, witnesses, informants, and others who have knowledge of narcotics trafficking and the laundering and concealing of proceeds of drug trafficking.

3. I have participated in investigations involving consensually monitored and consensually recorded telephone and in-person conversations involving informants and cooperating defendants, as well as investigations involving Court-

authorized interceptions of wire and electronic communications (“Title III” or “wiretap” investigations). I have participated in the analysis and targeting of telephone numbers used in furtherance of drug trafficking and money laundering operations. I also have received specialized training in Title III investigations.

4. Through these investigations, my training and experience, and conversations with other law enforcement officers, I have become familiar with the methods used by narcotics traffickers to distribute, transport, store, and import controlled substances. I also have become familiar with the methods used by narcotics traffickers to safeguard and distribute narcotics and to collect and launder narcotics proceeds. I am familiar with their use of prepaid cellular and cellular phones, normal land line phones, public phones, debit calling cards, counter-surveillance, the use of false and/or fictitious identities, and the use of coded language during conversations when referring to narcotics in an attempt to disguise the true meaning of the conversation.

5. This affidavit is submitted in support of a criminal complaint against Darrin PULPHUS, Shaun TURNER, David BOWDEN, Deshawn “Shake” WALLS, Derrell “D-Ski” WILLIAMS, Lawrence JOHNSON, Richard HOWARD, Curtis POPE, Rome PERKINS, and Edward HUMPHREY. This complaint alleges that:

a. From on or about February 7, 2019 to on or about April 24, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, PULPHUS, TURNER, BOWDEN, WALLS, WILLIAMS, JOHNSON, and HOWARD 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, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1), all in violation of 21 U.S.C. § 846.

b. On or about April 24, 2019, at the Riverdale truck yard, in the Northern District of Illinois, Eastern Division, and elsewhere, POPE did knowingly and intentionally distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

c. On or about February 9, 2019, at Chicago, in the Northern District of Illinois, ROME PERKINS knowingly and intentionally possessed with intent to distribute a controlled substance, namely, a 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

d. On or about April 10, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, JOHNSON did use and carry and knowingly possess a firearm, namely, a Glock model 27, 40 caliber pistol, bearing serial number BWE26, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, conspiracy to possess with intent to distribute and distribute a controlled substance; in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint; in violation of Title 18 United States Code Section 924(c).

e. On or about April 11, 2019, at Chicago, in the Northern District of Illinois, EDWARD HUMPHREY knowingly and intentionally possessed with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

6. I am familiar with the facts and circumstances regarding this investigation as a result of my personal participation in this investigation, and my review of: (a) reports and information provided by other law enforcement officers, including oral and written reports that I have received from other law enforcement officers; (b) telephone records, including subscriber information, toll records, pen registers, trap and trace information, and phone location monitoring; (c) information obtained from consensually recorded conversations and in-person meetings; (d) information derived from court-authorized interceptions of wire and electronic communications;<sup>1</sup> (e) the results of physical and video surveillance conducted by other law enforcement officers; (f) information provided by a confidential source; (g) information obtained from driver's license and automobile registration records; (h) information from public records and law enforcement databases; (i) my training and experience; and (j) the training and experience of other law enforcement officers involved in this investigation.

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<sup>1</sup> On January 23, 2019, February 21, 2019, and March 26, 2019, the Chief Judge of the Northern District of Illinois signed orders authorizing – at various times and in various combinations – the interception of wire and/or electronic communications to and from Target Phone 5, Target Phone 6, and Target Phone 8 (all used by PULPHUS).

7. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint and the issuance of arrest warrants against the proposed defendants, 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.

**FACTS SUPPORTING PROBABLE CAUSE**

8. Agents of the ATF, Drug Enforcement Administration (“DEA”), and Internal Revenue Service (“IRS”), as well as officers of the Chicago Police Department (“CPD”), have identified DARRIN PULPHUS as the leader of a drug trafficking organization (“Pulphus DTO”) responsible for obtaining and distributing kilogram quantities of cocaine in and around Chicago, Illinois. As discussed below, between February 7, 2019 and April 24, 2019, PULPHUS, TURNER, BOWDEN, WALLS, WILLIAMS, JOHNSON, and HOWARD conspired to obtain and then distribute at least 23 kilograms of cocaine throughout the Chicago area. Between February 7, 2019 and April 24, 2019, PULPHUS obtained kilogram quantities of cocaine on behalf of the Pulphus DTO, at least twice a month, from a Texas-based supplier, POPE. The Pulphus DTO sold wholesale quantities of cocaine to various customers in Chicago, including ROME PERKINS and EDWARD HUMPHREY. The investigation has revealed that:

a. PULPHUS is the leader of the Pulphus DTO. PULPHUS arranged to obtain and purchase kilogram quantities of cocaine from POPE and with



the assistance of TURNER. PULPHUS and sometimes TURNER acting on PULPHUS's behalf typically obtained these cocaine shipments from POPE at a truck yard in Riverdale, Illinois. PULPHUS obtained wholesale quantities of cocaine from POPE several times each month. Prior to obtaining the cocaine shipments, PULPHUS typically collected – or directed others (like HOWARD) to collect – buy money from his various co-conspirators, including BOWDEN, WALLS, WILLIAMS, JOHNSON, Individual D, Individual E, UM5-397, UM5-172, UM8-17, a portion of which money PULPHUS later gave to POPE at the time of the next cocaine shipment's delivery. After obtaining the kilogram quantity cocaine shipments, PULPHUS delivered portions of the shipment to his various co-conspirators, including BOWDEN, WALLS, WILLIAMS, and JOHNSON, to resell to others on behalf of the Pulphus DTO. PULPHUS also stored wholesale quantities of cocaine and proceeds from its sale at a condominium unit that he owns on Beach Drive in Chicago, and at BOWDEN's residence (Bowden Residence 1).

b. TURNER lives in Texas and assisted PULPHUS in obtaining cocaine shipments from POPE, a Texas-based cocaine supplier. Between August 2017 and April 24, 2019, TURNER flew from Houston to Chicago approximately 25 times to facilitate PULPHUS's purchase and receipt of cocaine shipments from POPE. On or about April 24, 2019, TURNER obtained approximately ten kilograms of cocaine from POPE at the Riverdale truck yard on PULPHUS's behalf, and then attempted to deliver the cocaine to PULPHUS at his Beach Drive condo in Chicago.

c. BOWDEN distributed wholesale quantities of cocaine on behalf of PULPHUS and the Pulphus DTO to other Pulphus DTO members and wholesale customers. BOWDEN also stored DTO cocaine at his residence and collected proceeds of cocaine sales made by other DTO members, which proceeds BOWDEN gave to PULPHUS to repay POPE for cocaine shipments.

d. WALLS, WILLIAMS, and JOHNSON are distributors of the Pulphus DTO. Each of these distributors obtained wholesale quantities of cocaine from PULPHUS, BOWDEN, or both, which cocaine they in turn sold to others. After selling their assigned share of the cocaine, each distributor turned in proceeds of those sales to either PULPHUS or BOWDEN. HOWARD, on at least one occasion, assisted PULPHUS in the distribution of a wholesale quantity of cocaine.

e. POPE is a Texas-based cocaine supplier. Between February 7, 2019, and April 24, 2019, POPE supplied kilogram quantities of cocaine to PULPHUS, either directly or through TURNER, on a monthly basis, and sometimes multiple times per month. POPE transported kilogram quantities of cocaine from Texas to Chicago in a semi-truck bearing a Texas license plate ("Pope Vehicle 1").<sup>2</sup>

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<sup>2</sup> On February 21, 2019, at approximately 8:00 a.m., LEOs observed Pope Vehicle 1 depart the Riverdale truck yard and maintained surveillance as it traveled south on I-57. At approximately 8:45 a.m., an Illinois State Trooper initiated a traffic stop of Pope Vehicle 1 to conduct a commercial motor carrier inspection. During the encounter, the Trooper asked the driver for identification. The driver provided a Texas commercial driver license with his photograph that identified the driver to be Curtis POPE of Houston, Texas. According to Texas Secretary of State records, Pope Vehicle 1 is registered to POPE at the same listed address. POPE was not issued a ticket. Although, on February 7, 2019, LEOs did not see the face of the individual who PULPHUS met with, LEOs observed POPE to meet with PULPHUS on February 21, March 3, March 13, March 16, March 28, April 2, and April 10, 2019, and have never observed anyone else driving Pope Vehicle 1. Accordingly, LEOs believe PULPHUS met with POPE on February 7, 2019, as well.

POPE also collects narcotics proceeds from PULPHUS as repayments for the cocaine shipments.

f. PERKINS, HUMPHREY, Individual A, and Individual F are wholesale cocaine customers of the Pulphus DTO.

9. Specifically, and as discussed in greater detail below:

a. On or about February 7, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to meeting with POPE, PULPHUS met with BOWDEN and picked up narcotics proceeds that he had stored at the Beach Drive condo to pay POPE for the shipment of cocaine. Two days later, on or about February 9, 2019, PULPHUS distributed a portion of that cocaine (approximately 999.8 grams) to PERKINS, which cocaine was subsequently seized by law enforcement. On or about February 15, 2019, PULPHUS collected from JOHNSON, Individual D, UM5-397, and UM5-172 proceeds from their respective sales of portions of the cocaine that PULPHUS had previously given them from the February 7 cocaine shipment. On that same day, BOWDEN advised PULPHUS that he still had a “34” of cocaine.

b. On or about February 21, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to meeting with POPE, PULPHUS met with Individual D to collect narcotics proceeds. After the transaction, PULPHUS met with BOWDEN at the Beach Drive condo, where PULPHUS gave BOWDEN a portion of the cocaine shipment and stored a portion of the shipment at the condo. On February 27, 2019, at the direction of PULPHUS,

HOWARD collected from WALLS proceeds from WALLS's sale of a portion of the cocaine that PULPHUS had previously given him from the February 21 cocaine shipment

c. On or about March 3, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to the delivery, WILLIAMS and WALLS asked PULPHUS for updates on the Pulphus DTO's anticipated resupply, advising that they were prepared to distribute the cocaine. Two days after the transaction with POPE, PULPHUS delivered a quantity of cocaine to WILLIAMS near the Carpenter Residence.

d. On or about March 13, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to the delivery, BOWDEN and HOWARD inquired of the status of the Pulphus DTO's anticipated cocaine resupply and advised they were prepared to distribute, and PULPHUS advised BOWDEN that the resupply would be a smaller than normal five kilograms. After the transaction with POPE, PULPHUS distributed a portion of that cocaine shipment to WALLS near Bowden Residence 1, then took another portion to BOWDEN at Bowden Residence 1.

e. On or about March 16, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. On the following day (March 17, 2019), PULPHUS distributed at least one kilogram of cocaine to WILLIAMS, who in turn distributed approximately 996.7 grams to Individual A. Law enforcement subsequently seized that cocaine from Individual A.

f. On or about March 28, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. On the day before and of the delivery, PULPHUS collected narcotics proceeds from WALLS, Individual D, Individual E, and UM8-17. Following the transaction, PULPHUS met with WALLS and BOWDEN, at Bowden Residence 1, to distribute a portion of the cocaine shipment to them.

g. On or about April 2, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to that delivery, PULPHUS collected narcotics proceeds from BOWDEN, WILLIAMS, and WALLS. After the delivery by POPE, PULPHUS met with WALLS near, and BOWDEN at, Bowden Residence 1 to distribute a portion of the cocaine shipment to both men. On or about April 4, 2019, PULPHUS sold approximately three kilograms of the April 2 cocaine shipment to Individual F for \$92,400.

h. On or about April 10, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to meeting POPE, PULPHUS met with WALLS to collect approximately \$20,000 in narcotics proceeds. After the transaction, PULPHUS gave at least approximately 994.8 grams of the cocaine shipment to JOHNSON, and other portions of the cocaine to WALLS and BOWDEN, who stored his portion at Bowden Residence 1. Law enforcement subsequently seized approximately 994.8 grams of cocaine and a handgun from JOHNSON. The following day, BOWDEN sold HUMPREY approximately 78.5 grams of cocaine, which law enforcement subsequently seized.

i. On or about April 24, 2019, TURNER obtained approximately 10 kilograms of cocaine from POPE at the Riverdale truck yard on PULPHUS's behalf, and handed POPE narcotics proceeds in exchange. After the transaction with POPE, TURNER drove to the Beach Drive condo to deliver the cocaine to PULPHUS. Law enforcement stopped TURNER in the condo's parking garage and found him in possession of approximately 10 kilograms of cocaine and a key to PULPHUS's Beach Drive condo (unit 809S). During the drive to the Beach Drive condo, TURNER realized that he was being followed by law enforcement, contacted PULPHUS, and alerted PULPHUS to his imminent arrest. Agents thereafter executed search warrants at the Beach Drive condo, Pulphus Residence 1, and Bowden Residence 1, and recovered (i) tens of thousands of dollars in cash at both PULPHUS locations, (ii) bulk drug paraphernalia at both the Beach Drive condo and Bowden Residence 1, and (iii) approximately 30 grams of crack cocaine and 10 grams of powder cocaine at Bowden Residence 1.

**I. PULPHUS obtained a cocaine shipment from POPE (February 7, 2019)**

10. As discussed below, on February 7, 2019, PULPHUS collected narcotics proceeds from BOWDEN, then used that money along with other narcotics proceeds that PULPHUS had collected to give to POPE in exchange for wholesale quantities of cocaine. Two days later, on or about February 9, 2019, PULPHUS distributed a portion of that cocaine (approximately 999.8 grams) to PERKINS, which cocaine was subsequently seized by law enforcement. On or about February 15, 2019, PULPHUS collected from JOHNSON, Individual D, UM5-397, and UM5-172 proceeds from their

respective sales of portions of the cocaine that PULPHUS had previously given them from the February 7 cocaine shipment.

**A. PULPHUS collects narcotics proceeds from BOWDEN to obtain cocaine shipment from POPE (February 7, 2019)**

11. On February 7, 2019, at approximately 9:30 a.m., surveillance observed PULPHUS drive in Pulphus Vehicle 1 from a single family residence located on the 19600 block of Ridgemont Drive in Tinley Park, Illinois (“Pulphus Residence 1”)<sup>3</sup> to a condominium building located on the 4800 block of South Chicago Beach Drive in Chicago (the “Beach Drive condo”).<sup>4</sup> At approximately 10:11 a.m., surveillance

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<sup>3</sup> PULPHUS Residence 1 was identified as PULPHUS’s residence based on the following: According to records maintained by the Cook County Recorder of Deeds PULPHUS owns Pulphus Residence 1. As described in this Affidavit, PULPHUS has been observed driving a red 2016 Ford F-150 truck (“Pulphus Vehicle 1”) on numerous occasions. According to records maintained by the Illinois Secretary of State, Pulphus Vehicle 1 is registered to PULPHUS’s wife, Individual C, at Pulphus Residence 1. According to court authorized location information for Pulphus Vehicle 1 and Target Phones 5, 6 and 8 all used by PULPHUS as described below, placed PULPHUS at Pulphus Residence 1 each night and morning with very few exceptions from January 28, 2019 through April 8, 2019. And on April 24, 2019, LEOs searched Pulphus Residence 1. PULPHUS was present and admitted to residing there, and LEOs recovered numerous pieces of mail, personal effects and papers, belonging to PULPHUS at Pulphus Residence 1.

<sup>4</sup> The Beach Drive condo is a multiunit secure residential building, located at 4800 South Chicago Beach Drive in Chicago, Illinois. Residents use key-cards to gain access to the front door. On February 1, 2019, and again on February 11, 2019, LEOs observed PULPHUS enter the Beach Drive condo through the front door of the building. According to information provided by a building employee at the Beach Drive condo, the key-card used to access the building at the time PULPHUS was seen entering on February 11, 2019, is registered to Unit 809S. According to the building employee, this unit is leased to Individual B. According to a database that, in my experience, analyzes numerous records from various data sources, including financial and governmental institutions, to provide accurate identifying information regarding individuals (“Records Database”), Individual B currently resides in Cupertino, California. On or about April 3, 2019, LEOs searched the trash outside of Pulphus Residence 1, where PULPHUS resides (as described above). LEOs found several pieces of mail addressed to the Beach Drive condo, including a letter from the United States Postal Service, an envelope from Berkshire Hathaway, and an envelope from Chase bank.

observed PULPHUS exit Pulphus Vehicle 1 carrying a large, dark colored bag that appeared to be heavy, and walk into the main entrance of the Beach Drive condo. Based on my training and experience, my knowledge of the investigation, including prior and subsequent calls, surveillance, and the events described below, including the February 9, March 16, and April 10, 11, and 24 seizures, I believe that, at this time, PULPHUS was carrying a bag containing narcotics proceeds, which he planned to use to purchase cocaine from POPE later that day.

12. At approximately 11:08 a.m. (TP5 Session 764), PULPHUS, using Target Phone 5,<sup>5</sup> called BOWDEN, who was using Bowden Phone 1.<sup>6</sup> During their conversation, PULPHUS stated, “Alright, what you got laying around [narcotics

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<sup>5</sup> Agents identified PULPHUS as the user of Target Phones 5, 6, and 8 as follows: During a traffic stop on September 7, 2018, PULPHUS provided officers with an Illinois driver’s license bearing his photograph and the name “Darrin Pulphus.” Target Phone 6 is subscribed to Darrin PULPHUS at Pulphus Residence 1. On February 1, 2019, the combination of surveillance and the use of a cell-site simulator placed PULPHUS and Target Phone 6 together in multiple locations at the same times. In addition, court authorized location information for Target Phone 6 showed that Target Phone 6 was regularly located in the vicinity of Pulphus Residence 1 during early morning hours. Similarly, on February 15, 2019, the combination of surveillance and the use of a cell-site simulator placed PULPHUS and Target Phone 8 together in multiple locations at the same times. Agents familiar with PULPHUS’s voice from prior interactions with him (including the April 24, 2019 execution of search warrants at his residence) compared the voice of the users of Target Phones 5, 6, and 8 to each other and, based on that comparison, determined that the voice belonged to the same man (PULPHUS).

<sup>6</sup> Agents identified BOWDEN as the user of Bowden Phone 1 as follows: Surveillance agents who have observed BOWDEN in the course of this investigation have reviewed an Illinois driver’s license photograph of BOWDEN and, based on that review, identified BOWDEN as the man observed at various times discussed in this affidavit. In the course of the investigation, agents observed BOWDEN driving a Nissan Rogue registered to Enterprise, which records listed BOWDEN as the renter of the vehicle and his phone number as Bowden Phone 1. Bowden Phone 1 is subscribed to “David BOWDEN.” Agents familiar with BOWDEN’s voice from prior interactions with him during the execution of a search warrant at Bowden Residence 1 reviewed the recordings of the user of Bowden Phone 1 and, based on that review, determined that BOWDEN is the user of Bowden Phone 1.



proceeds], just bring it with [to meet with PULPHUS]... ‘Cause Dude and ‘em [POPE, PULPHUS’s narcotics supplier] gon' be here probably about 3:00 or 4:00.”<sup>7</sup> BOWDEN stated, “Okay.” PULPHUS stated, “Yeah, so just have that [narcotics proceeds] on [with] you 'cause I'mma grab it. I'm finna [U/I] grab it now.”

13. At approximately 11:50 a.m. (TP5 Session 779), BOWDEN, using Bowden Phone 1, called PULPHUS, who was using Target Phone 5. During this call, PULPHUS stated, “Where you at, DB?” BOWDEN stated, “I’m getting off on 47<sup>th</sup> right now.” PULPHUS responded, “All right. Well, I’m outside in front of the building [the Beach Drive condo]. So just keep coming down, you know, east end [South East End Avenue]. You’ll see my truck.” BOWDEN stated, “Alright.”

14. Shortly thereafter, agents observed PULPHUS exit the Beach Drive condo carrying the same large, dark colored bag that he had earlier carried into the premises. Law enforcement observed PULPHUS place the bag in the back seat of Pulphus Vehicle 1, close the rear passenger door of Pulphus Vehicle 1, and then enter the vehicle.

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<sup>7</sup> Some of the recorded conversations and text messages (“recorded conversations”) have been summarized in this Affidavit. The language that is quoted from the recorded conversations throughout this Affidavit is based upon a preliminary review of the recorded conversations, and not final transcripts of the recorded conversations. The times listed for the recorded conversations are approximate. The summaries do not include all statements or topics covered during the course of the recorded conversations. At various points in the Affidavit I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on the contents and context of the recorded conversations, events that took place before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

15. At approximately 11:54 a.m., agents observed BOWDEN park his Saturn vehicle (“Bowden Vehicle 1”) outside the Beach Drive condo and behind Pulphus Vehicle 1, exit the Saturn, and then enter the front passenger side of Pulphus Vehicle 1 where PULPHUS was waiting. LEOs then observed PULPHUS depart the area. Based on my training and experience, my knowledge of the investigation, including prior and subsequent calls, surveillance, and the events described below, including the seizure of a kilogram of cocaine from PERKINS two days later, I believe that, at this time, BOWDEN gave PULPHUS an amount of narcotics proceeds, which he and PULPHUS added to the narcotics proceeds that PULPHUS had earlier obtained from the Beach Drive condo and placed in the dark bag that he carried out of the condo.

**B. PULPHUS obtains cocaine shipment from POPE at the Riverdale truck yard and discusses the quality of the cocaine shipment with Individual F (February 7, 2019)**

16. Later that evening (February 7, 2019), at approximately 8:56 p.m., court-authorized geo-location information for Pulphus Vehicle 1 placed PULPHUS’s truck, Pulphus Vehicle 1, in the vicinity of a gated truck yard located at 4782 West 138<sup>th</sup> Street in Riverdale, Illinois (the “Riverdale truck yard”).

17. According to surveillance footage from video cameras of the Riverdale truck yard, at approximately 9:22 p.m., a semi truck bearing a Texas license plate (“Pope Vehicle 1”) entered the lot and parked near Pulphus Vehicle 1. At this time, surveillance footage captured PULPHUS meet with an individual, believed to have been POPE, driving the semi-truck. At approximately 9:34 p.m., surveillance footage

captured and surveillance officers observed PULPHUS exit the truck yard in Pulphus Vehicle 1.

18. Surveillance agents then observed PULPHUS drive to the Beach Drive condo, exit Pulphus Vehicle 1 carrying a dark colored bag, and enter the main entrance of the condo. A few minutes later, surveillance observed PULPHUS exit the building without the bag, reenter Pulphus Vehicle 1, and depart the area.

19. Based on my training and experience, my knowledge of the investigation, including prior and subsequent calls, surveillance, and the events described below, including the February 9, March 16, and April 10 and 11 cocaine seizures, I believe that, on February 7, 2019, PULPHUS (a) obtained narcotics proceeds that he had stored at the Beach Drive condo; (b) met with BOWDEN outside the Beach Drive condo, where Bowden gave PULPHUS additional narcotics proceeds; (c) met with, and obtained at least approximately 999.8 grams of cocaine from, POPE at the Riverdale truck yard; and (d) transported the cocaine to the Beach Drive condo, where PULPHUS stored the narcotics for subsequent distribution.

20. Later the same evening, at approximately 10:18 p.m. (TP5 Session 825), PULPHUS, who was using Target Phone 5, called Individual F, who was using Individual F Phone 1. During their conversation, Individual F asked, "They [cocaine obtained from POPE] pretty like the last ones?" PULPHUS responded, "It gonna be over with tomorrow quick [the cocaine is going to sell fast]. So what you wanna do?" Individual F responded, "I was just asking was they pretty like the last one?" PULPHUS responded, "Yeah, I mean, they, they pretty [the narcotics are good

quality].” Based on my training and experience, my knowledge of the investigation, including the previous intercepted calls and the events described above observed on surveillance, as well as the context of the conversation, I believe that PULPHUS and Individual F discussed the quality of the cocaine that PULPHUS obtained from his narcotics source earlier that evening.

**C. PULPHUS distributed approximately one kilogram of cocaine to PERKINS at the Carpenter Residence (February 9, 2019)**

21. According to toll records for Target Phone 6, on or about February 9, 2019, between approximately 11:00 a.m. and 3:36 p.m., one of PULPHUS’s phones (Target Phone 6) was in contact with Perkins Phone 1 (used by PERKINS)<sup>8</sup> approximately ten times, including a two minute and eight second call at 11:01 a.m. Based on my training and experience, and my knowledge of the investigation, including subsequent surveillance, previous and subsequent intercepted conversations, and the subsequent seizure of approximately one kilogram of cocaine from PERKINS, I believe that, during these calls, PERKINS made arrangements to purchase one kilogram of cocaine from PULPHUS at a single-family residence located on the 6600 block of South Carpenter in Chicago (the “Carpenter Residence”).

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<sup>8</sup> Agents identified PERKINS as the user of Perkins Phone 1 as follows: Perkins Phone 1, according to T-Mobile, is subscribed to “Rome Perkins.” As discussed below, immediately after the last of ten contacts between Perkins Phone 1 and one of PULPHUS’s phones (Target Phone 6), surveillance observed PERKINS enter the same residence that PULPHUS had entered only one hour earlier (the Carpenter Residence). As further discussed below, PERKINS exited the Carpenter Residence only moments after he had entered, and, during a subsequent traffic stop, presented an Illinois driver’s license, bearing the his photograph and the name “Rome PERKINS.”

22. On or about February 9, 2019, at approximately 2:30 p.m., surveillance observed PULPHUS drive Pulphus Vehicle 1 to the Carpenter Residence and enter the building. At approximately 3:30 p.m., surveillance observed a man, later identified as PERKINS, park a black Mercedes Benz<sup>9</sup> in front of the residence. Surveillance observed PERKINS exit the vehicle carrying a green camouflage colored bag and approach the residence. Moments later, surveillance observed PERKINS carry the same green bag back to his vehicle. Surveillance observed PERKINS re-enter the Mercedes with the bag and depart the area.

23. Based on my training and experience, and my knowledge of the investigation, including surveillance, previous and subsequent intercepted conversations, and the subsequent seizure of approximately one kilogram of cocaine from PERKINS, I believe that, at this time, PERKINS met with PULPHUS and obtained from PULPHUS approximately 999.8 grams of cocaine.

24. At approximately 3:50 p.m., surveillance observed the black Mercedes commit a traffic violation and curbed the vehicle. During their stop, officers asked for the driver to present identification, and the driver provided a State of Illinois driver's license, bearing the driver's photograph and the name "Rome PERKINS" at Perkins Residence 1. Upon approach of the vehicle, officers observed the above-described green bag in the front passenger seat of the vehicle. Based on their prior observations of PERKINS carrying the same bag out of the Carpenter Residence (at which LEOs

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<sup>9</sup> According to Illinois Secretary of State records, the Mercedes Benz was registered to "Rome PERKINS" at an address on the 7100 block of South Richmond Street in Chicago ("Perkins Residence 1").

had previously observed PULPHUS conduct suspected narcotics transactions on numerous occasions<sup>10</sup>) and prior interceptions in which PULPHUS discussed his plans to distribute the cocaine he obtained from POPE on February 7, 2019, officers recovered the bag and discovered it to contain a rectangular brick of compacted white powdery substance, which was analyzed by the Illinois State Police Forensic Science Center and found to contain 999.8 grams of cocaine. Following this seizure, officers released PERKINS without charges in order to continue the ongoing covert investigation.

25. Based on my training and experience, and my knowledge of the investigation, including toll records, surveillance, previous and subsequent intercepted conversations, and the subsequent seizure of cocaine from PERKINS, I believe that, during the aforementioned meeting at the Carpenter Residence, PULPHUS distributed to PERKINS approximately 999.8 grams of cocaine, which was a portion of a larger shipment of cocaine that PULPHUS had previously obtained from POPE at the Riverdale truck yard on February 7, 2019.

26. On February 12, 2019, at approximately 8:23 a.m. (TP5 Session 992) – less than three days after the seizure of approximately one kilogram of cocaine from PERKINS – PULPHUS, using Target Phone 5, called UM5-15. During their

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<sup>10</sup> Between January 28, 2019 and April 24, 2019, surveillance observed PULPHUS and HOWARD meet with approximately 10 people at the Carpenter Residence. Each meeting was typically no longer than five minutes (often less) and concluded with the visitor exiting the residence with either a bag or object visible in their pocket. Based on my training and experience, together with prior intercepted calls, PULPHUS and HOWARD conduct at the Carpenter Residence was consistent with the operation of narcotics sales at a secure stash house.

conversation, PULPHUS stated, “Hey, I’mma get a new phone so I ain’t gonna talk too much on this one [Target Phone 5]. There’s been some crazy shit going on [the PERKINS cocaine seizure]...” UM5-15 stated, “I understand.” PULPHUS continued, “So I’mma call you today from a new line.” Based on my training and experience, my knowledge of the investigation, and the context of the conversation, I believe PULPHUS told UM5-15 he was going to get a new phone because law enforcement had seized from one of his customers (PERKINS) approximately one kilogram of cocaine that he had supplied and he was concerned that the seizure might result in law enforcement’s detection of his (PULPHUS’s) drug trafficking activities.

**D. PULPHUS collects narcotics proceeds from JOHNSON’s and Individual D’s sales of their portions of the February 7 Cocaine Shipment (February 15, 2019)**

27. On February 15, 2019, at approximately 9:50 a.m., surveillance observed PULPHUS exit the Beach Drive condo, enter Pulphus Vehicle 1, and depart the area.

28. At approximately 9:55 a.m. (TP5 Session 1116), PULPHUS, using Target Phone 5, called BOWDEN, who was using Bowden Phone 1. During their conversation, PULPHUS asked, “Hey, you gonna do something with that 34 [referring to an amount of cocaine], or you want me to grab it?” BOWDEN responded, “Uh, yeah if you need it. I ain’t got nothing lined up for it yet [BOWDEN has not yet sold it to a narcotics distributor]. So if you got something lined up, I know what’s his name been calling me. [UM5-15]. He working. He wanted me to come by yesterday [to deliver narcotics].” PULPHUS stated, “Yeah, I’ll probably get up with his ass [meet with

UM5-15 to conduct a narcotics transaction],” and continued, “I’ll hit you in about an hour or two. Let me see what’s happening.”

29. Based on my training, experience, and familiarity with this case – including subsequent intercepted calls between PULPHUS and BOWDEN, subsequent surveillance of PULPHUS and BOWDEN together following cocaine deliveries by POPE, the April 11, 2019 seizure of approximately 78.5 grams of cocaine from HUMPHREY following his hand-to-hand transaction with BOWDEN, and the April 24, 2019 seizure of cocaine and crack cocaine at Bowden Residence 1 – I believe that (a) after he obtained the cocaine shipment from POPE on February 9, 2019, PULPHUS gave a portion of that shipment to BOWDEN to store at Bowden Residence 1 and to sell to others; and (b) on February 15, 2019, BOWDEN still had a portion of that cocaine that he had not yet sold.

30. On February 15, 2019, PULPHUS, using Target Phone 5, had a series of calls with JOHNSON, using Johnson Phone 1,<sup>11</sup> during which PULPHUS arranged to meet with JOHNSON to obtain narcotics proceeds from JOHNSON:

a. At approximately 10:18 a.m. (TP5 Session 1125), PULPHUS stated, “You would call and then we leave from down that way, man. I been down

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<sup>11</sup> Agents identified Lawrence JOHNSON as the user of Johnson Phone 1 based on the following: On April 10, 2019, the user of Johnson Phone 1 made arrangements to meet with PULPHUS outside Bowden Residence 1. At that time and place, surveillance observed PULPHUS meet with a man. Surveillance agents reviewed an Illinois driver’s license photograph of “Lawrence JOHNSON,” and based on that review, determined that JOHNSON was the man who met with PULPHUS that day and the user of Johnson Phone 1. Further, on the same day, JOHNSON was stopped by LEOs and identified himself as “Lawrence JOHNSON.”



that way all morning.” JOHNSON responded, “I was in this mother\*\*\*\*\* knocked out, man.” PULPHUS and JOHNSON continued their conversation, and ended the call with the agreement that they would meet up later that day.

b. At approximately 10:56 a.m. (TP5 Session 1131), PULPHUS called JOHNSON and asked, “You down there on the drive?” JOHNSON stated, “Yeah.” PULPHUS stated, “Alright. Give me about 30 minutes. I’mma slide on you [to conduct narcotics related business].” JOHNSON stated, “Alright.”

c. At approximately 11:43 a.m. (TP5 Session 1133), PULPHUS called JOHNSON. PULPHUS stated, “Come on out.” JOHNSON responded, “Alright, here I come.”

31. Based on my training, experience, and familiarity with this case – including subsequent intercepted calls between PULPHUS and JOHNSON, subsequent seizures of cocaine from numerous Pulphus DTO members and customers following PULPHUS’s meetings with POPE to obtain cocaine and the April 10, 2019 seizure of approximately one kilogram of cocaine and a handgun from JOHNSON (discussed below) – I believe that (a) after he obtained the cocaine shipment from POPE on February 7, 2019, PULPHUS gave a portion of that shipment to JOHNSON to sell to others; and (b) on February 15, 2019, at approximately 11:43 a.m., PULPHUS met with JOHNSON and collected proceeds from JOHNSON’s sale of that cocaine.

32. Between approximately 10:02 a.m. and 11:43 a.m. (TP5 Session 1123, 1128, 1131, 1133), PULPHUS, using Target Phone 5, had a series of calls with UM5-

397 and UM5-172. During these calls, PULPHUS arranged to meet with both individuals in turn. According to court authorized location information, PULPHUS's phone (Target Phone 5) stopped at two different locations during this time.

33. At approximately 12:57 p.m. (TP5 Session 1140), PULPHUS, using Target Phone 5, called Individual D, who was using Individual D Phone 1. During their conversation, PULPHUS stated, "What up? You make it around [selling narcotics] yet?" Individual D stated, "Yeah, I just got in the city. Let me call you right back." PULPHUS stated, "How long? I'm getting ready to slide to the burbs. Want me to stick around [to meet with, and collect narcotics proceeds from, Individual D] or catch you later?" Individual D stated, "I'm out here right now, I'm just saying, I got to— I'm on Justine and 69<sup>th</sup> [in Chicago, Illinois]." PULPHUS stated, "Alright. Want me to pull up in front of Boo [Individual F] crib?" Individual D stated, "Yeah, I'll meet you over there. That's cool."

34. At approximately 1:07 p.m. (TP5 Session 1142), Individual D, using Individual D Phone 1, called PULPHUS, who was using Target Phone 5. PULPHUS answered the call and stated, "Shit, pulling back up. Coming up May [May Street]."

35. Based on my training, experience, and familiarity with this case – including subsequent intercepted calls between PULPHUS and Individual D, prior and subsequent surveillance, and subsequent seizure of cocaine from numerous Pulphus DTO members and customers following PULPHUS's meetings with POPE to obtain cocaine – I believe that (a) after he obtained the cocaine shipment from POPE on February 7, 2019, PULPHUS gave a portion of that shipment to Individual

D to sell to others; and (b) on February 15, 2019, soon after 1:07 p.m., PULPHUS met with Individual D and collected approximately \$2,800 in narcotics proceeds from Individual D's sale of that cocaine.

36. At approximately 1:26 p.m. (TP5 Session 1144), PULPHUS, using Target Phone 5, called Individual D, who was using Individual D Phone 1. During their conversation, PULPHUS stated:

a. "Hey, [Individual D], that wasn't no 3,000 [\$3,000] that you just gave me." Individual D asked, "What I give you?" PULPHUS stated, "One of 'em [stacks of money] just 800 [\$800] on there. The one with the hundreds [hundred dollar bills]— The one with all the hundreds and the fifties, that was just 800 [\$800]. I'm still right here [PULPHUS is still in the area and can meet with Individual D]." Individual D stated, "Okay, I must have miscounted then. My bad." PULPHUS stated, "Yup."

b. Individual D stated, "I did that cause I had that shit put up. So I counted that shit yesterday so. You want that 2 [\$200] now?" PULPHUS stated, "Yeah, I really do [U/I] somebody call, might need to give him 3,000 [PULPHUS will need to have \$3,000 for his narcotics source, POPE]. What I need to give him [POPE]." Individual D stated, "Okay, I got it [\$200]. I'm finna come around the corner [to meet with PULPHUS again] in one second." PULPHUS stated, "Okay, I'm still on May [Street]."

37. At the time of this call, according to court authorized cell site information, PULPHUS was located at a single family residence located at 7609 South May Street.

38. Based on my training, experience, and familiarity with this investigation – including prior interceptions and prior and subsequent seizures of cocaine from PULPHUS’s associates – I believe that, soon after the aforementioned call, PULPHUS met with, and obtained an additional \$200 in narcotics proceeds from, Individual D.

39. On February 19, 2019, at approximately 10:55 (TP5 Session 1204), PULPHUS, using Target Phone 5, had a conversation with JOHNSON, using Johnson Phone 1. PULPHUS stated, “Check it out. I just went through what you had gave me the other day [narcotics proceeds from February 15].” JOHNSON stated, “Yeah.” PULPHUS stated, “And it was like 550 [\$550] off.” JOHNSON asked, “You said 550 [\$550] off?” PULPHUS responded, “Did you go through it? It was 550 off. I went through it three times [PULPHUS counted the money three times]. Motherf\*\*\*\*\* 550 off.” JOHNSON stated, “Okay.” PULPHUS stated, “I went through it three times too, so. I know your shit don’t normally be off [JOHNSON normally provides PULPHUS with the correct amount of narcotics proceeds].” JOHNSON responded, “Nah,” and continued, “That’s odd, but I got you, Unc. [JOHNSON would provide the missing \$550 to PULPHUS.]”

**II. PULPHUS obtained a shipment of cocaine from POPE (February 21, 2019)**

40. As discussed below, on or about February 21, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to meeting with POPE, PULPHUS met with Individual D to collect narcotics proceeds. After the transaction, PULPHUS met with BOWDEN at the Beach Drive condo, where PULPHUS gave BOWDEN a portion of the cocaine shipment and stored a portion of the shipment at the condo.

**A. PULPHUS collects narcotics proceeds from Individual D to purchase cocaine shipment from POPE (February 20, 2019)**

41. On February 20, 2019, at approximately 9:35 a.m. (TP5 Session 1243), PULPHUS, using Target Phone 5, called Individual D, who was using Individual D Phone 1. During their conversation, Individual D stated, “Man, I got the 8 piece [\$8,000 in narcotics proceeds] for you.” PULPHUS responded, “Alright. Well, it’s [PULPHUS’s narcotics transaction with POPE to obtain more cocaine] gonna be tomorrow anyway, so...” PULPHUS continued, “You in the area?” Individual D stated, “Nah, I ain’t even coming out today. Shit, ain’t no sense in me coming out today, you ain’t got nothing [PULPHUS does not have more cocaine for Individual D to distribute].” PULPHUS stated, “Well, I’ll slide on you [PULPHUS will meet with Individual D to obtain narcotics proceeds].”

42. At approximately 3:00 p.m. (TP5 Session 1255), Individual D, using Individual D Phone 1, called PULPHUS, who was using Target Phone 5. During their conversation, PULPHUS stated, “Shit, I’m finna pull on you in about 2 or 3 minutes.”

Individual D stated, “Okay. I’mma get up.” Four minutes later (TP5 Session 1256), PULPHUS, using Subject Phone 5, called Individual D, who was using Individual D Phone 1. Individual D answered the call and PULPHUS stated, “Alright, I’m finna go to the door.”

43. According to court-authorized location information, at approximately 3:06 p.m., Pulphus Vehicle 1 was located at 5220 211<sup>th</sup> Street in Matteson, Illinois, and later returned to the vicinity of the Carpenter Residence. According to information maintained by the Cook County Recorder or Deeds, Individual D and Individual C own a residence located at 4419 Farmington Avenue in Richton Park, Illinois (“Individual D Residence 1”), which is approximately three miles from 5220 211<sup>th</sup> Street.

44. Based on my training, experience, and familiarity with this case – including prior and subsequent intercepted calls between PULPHUS and Individual D, prior and subsequent surveillance, and subsequent seizure of cocaine from numerous Pulphus DTO members and customers following PULPHUS’s meetings with POPE to obtain cocaine – I believe that (a) after he obtained the cocaine shipment from POPE on February 7, 2019, PULPHUS gave a portion of that shipment to Individual D to sell to others; and (b) on February 20, 2019, soon after 3:00 p.m., PULPHUS met with Individual D and collected proceeds from Individual D’s sale of that cocaine.

**B. PULPHUS obtains a cocaine shipment from POPE at the Riverdale truck yard (February 21, 2019)**

45. The following day, on February 21, 2019, at approximately 7:33 a.m., according to court-authorized location information, Pulphus Vehicle 1 was located at West 138<sup>th</sup> Street and Ashland Avenue in Riverdale, Illinois, which is in the vicinity of the Riverdale truck yard. On the same day, at approximately 7:38 a.m., law enforcement officers observed Pope Vehicle 1 parked in the same spot in the Riverdale truck yard where it had previously been observed, through video surveillance, on February 7, 2019.

46. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the February 9 seizure of approximately one kilogram of cocaine from PERKINS, and subsequent seizures of cocaine following similar meetings between PULPHUS and POPE at the Riverdale truck yard, I believe that, at that time, PULPHUS met with POPE at the Riverdale truck yard and obtained wholesale quantities of cocaine.

**C. After meeting with POPE, PULPHUS met with BOWDEN at the Beach Drive condo (February 21, 2019)**

47. On February 21, 2019, at approximately 7:34 a.m. (TP5 Session 1273) – during or soon after his meeting with POPE – PULPHUS, who was using Target Phone 5, called BOWDEN, who was using Bowden Phone 1. During their conversation, PULPHUS asked, “What you got going on this morning?” BOWDEN stated, “Shit, I’m suppose to pick someone up at 11:00. That’s when I’m supposed to start [selling cocaine].” PULPHUS stated, “Alright,” and continued, “I’ll probably

have you meet me down there [at the Beach Drive condo] in about 20 minutes.” BOWDEN stated, “Okay.” PULPHUS stated, “Hey, check it out. You carry all your [U/I] your [U/I] there?” BOWDEN responded, “Yeah.” PULPHUS stated, “Bring that with you over there.”

48. At approximately 8:04 a.m. (TP5 Session 1277), BOWDEN, using BOWDEN Phone 1, called PULPHUS, who was using Target Phone 5. During their conversation, PULPHUS stated, “Give me about five minutes. You got a parking spot?” BOWDEN responded, “Yeah, I’m almost here [the Beach Drive condo]. I’ll be there about five minutes.” PULPHUS stated, “Alright. Just park somewhere.”

49. At approximately 8:15 a.m., surveillance observed BOWDEN park Bowden Vehicle 1 on the east side of the 4900 block of S. Cornell Ave (near the Beach Drive condo). At approximately 8:18 a.m., surveillance observed PULPHUS drive past Bowden Vehicle 1 on Cornell and circle the block in Pulphus Vehicle 1. A short time later, surveillance observed PULPHUS park Pulphus Vehicle 1 directly across the street from the south entrance of the Beach Drive condo, exit the vehicle, and retrieve a black duffle bag from the rear driver’s side door of the vehicle. Surveillance then observed BOWDEN carrying a gray and black duffle bag toward the Beach Drive condo. PULPHUS and BOWDEN entered the Beach Drive condo together, carrying their respective duffle bags.

50. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the February 9 seizure of approximately one kilogram of cocaine, and subsequent



seizures of cocaine following similar meetings between PULPHUS and POPE at the Riverdale truck yard, I believe that, after meeting with POPE at the Riverdale truck yard to obtain bulk quantities of cocaine, PULPHUS (a) transported the cocaine to the Beach Drive condo, where he met with BOWDEN; (b) while at the Beach Drive condo, gave some or all of the cocaine to BOWDEN; and (c) stored whatever amount of cocaine that he did not give to BOWDEN at the Beach Drive condo.

**D. PULPHUS directed HOWARD to collect narcotics proceeds from WALLS (February 27, 2019)**

51. On February 27, 2019, at approximately 1:57 p.m. (TP6 Session 447), PULPHUS, who was using Target Phone 6, had a conversation with HOWARD, who was using Howard Phone 1.<sup>12</sup> During the conversation, PULPHUS asked, “Hey, won’t you go slide on Shake [WALLS]? He got something small [a small amount of narcotics proceeds]. Put it up for me [keep the money safe for PULPHUS to retrieve later].” PULPHUS stated, “You know where Shake stay on 74<sup>th</sup>?” HOWARD responded, “Yeah.” PULPHUS stated, “Why don’t you slide over there and grab something [narcotics proceeds] for me? Just put it up for me.” HOWARD stated, “Alright.” PULPHUS stated, “It’s something small [a small amount of narcotics proceeds]. Just

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<sup>12</sup> Agents identified HOWARD as the user of Howard Phone 1 as follows: On March 14, 2019, at approximately 8:43 a.m. (TP6 Session 1658), PULPHUS, using Target Phone 6, called the man using Howard Phone 1. During their conversation PULPHUS stated, “You got your clothes on? I’m finna pull up.” The user of Howard Phone 1 responded, “Yup.” PULPHUS stated, “Alright. How that van started up? I’m pressed for time right quick.” On this same date, surveillance observed a man driving PULPHUS in a white colored van (referenced by PULPHUS in call Session 1658). Law enforcement observed the van commit a traffic violation. At approximately 10:40 a.m., law enforcement conducted a traffic stop of the white van and asked for the driver to provide identification. The driver provided an Illinois driver’s license, bearing the driver’s photograph and the name “Richard Howard.”

put it up [keep it safe for PULPHUS],” and continued, “He [WALLS] waiting on you now.” HOWARD stated, “Alright.”

52. On the same day, at approximately 2:07 p.m. (TP6 Session 454), PULPHUS, who was using Target Phone 6, had a conversation with HOWARD, who was using Howard Phone 1. During the conversation, HOWARD stated, “Hey, I’m over here [to meet with WALLS].” PULPHUS responded, “Alright, go on the porch.” HOWARD stated, “Hey, June Bug said call him. Something wrong with his phone.” PULPHUS stated, “Alright, just go on and take care of that, Rich [retrieve the narcotics proceeds from WALLS].” HOWARD stated, “Alright.”

53. Two minutes later, at approximately 2:09 p.m. (TP6 Session 456), HOWARD, using Howard Phone 1, called PULPHUS, using Target Phone 6. During this call, HOWARD stated, “I got that [the narcotics proceeds from WALLS].” PULPHUS stated, “Alright, just put it up [directing HOWARD to store the proceeds for PULPHUS].” HOWARD stated, “Alright.”

54. Based on my training, experience, and familiarity with this case – including prior and subsequent intercepted calls between PULPHUS, WALLS, and HOWARD, prior and subsequent surveillance, subsequent seizures of cocaine from numerous Pulphus DTO members and customers following PULPHUS’s meetings with POPE to obtain cocaine; HOWARD’s suspected receipt on March 16, 2019 of a portion of the cocaine that POPE delivered to PULPHUS earlier that day (discussed below); and HOWARD’s assistance of PULPHUS with the distribution of approximately at least one kilogram of cocaine to WILLIAMS, which kilogram law

enforcement subsequently seized from WILLIAMS's customer (Individual A) – I believe that (a) after he obtained the cocaine shipment from POPE on February 21, 2019, PULPHUS gave a portion of that shipment to WALLS to sell to others; (b) on February 27, 2019, at approximately 2:09 p.m., at the direction of PULPHUS, HOWARD met with WALLS and collected proceeds his sale of that cocaine; and (c) HOWARD stored the narcotics proceeds for later collection by PULPHUS.

**III. PULPHUS obtained a cocaine shipment from POPE and arranged to distribute portions of those narcotics to WILLIAMS and WALLS (March 3, 2019)**

55. On or about March 3, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to the delivery, WILLIAMS and WALLS asked PULPHUS for updates on the Pulphus DTO's anticipated resupply, advising that they were prepared to distribute the cocaine. Two days after the transaction with POPE, PULPHUS delivered a quantity of cocaine to WILLIAMS near the Carpenter Residence.

**A. PULPHUS discussed POPE's incoming shipment of cocaine with WILLIAMS and WALLS (March 3, 2019)**

56. On February 28, 2019, at approximately 2:37 p.m. (TP6 Session 583), WILLIAMS, using Williams Phone 1,<sup>13</sup> called PULPHUS, who was using Target

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<sup>13</sup> Agents identified WILLIAMS as the user of Williams Phone 1 as follows: As discussed below, on March 17, 2019, at approximately 12:19 p.m. (TP6 Session 1904), the user of Williams Phone 1 called PULPHUS, who was using Target Phone 6, and arranged to meet PULPHUS. At approximately 1:22 p.m. (TP6 Session 1929), PULPHUS, using Target Phone 6, called the user of Williams Phone 1 and stated, "I'm outside. Pulling up." The user of Williams Phone 1 responded, "Alright, here I come." At this time, surveillance officers observed PULPHUS driving a silver BMW SUV, followed closely by HOWARD in a white van, park in the back of a residence on the 10800 block of South Racine Avenue in Chicago ("Williams Residence 1"). Surveillance thereafter observed WILLIAMS exit Williams

Phone 6. During their conversation, WILLIAMS asked, “How you do me [fail to deliver cocaine] like this?” PULPHUS responded, “Shit, tomorrow for sure.” WILLIAMS asked, “Ain’t nothing laying [cocaine available for WILLIAMS to distribute] around?” PULPHUS stated, “Uh-uh [no]. I’m supposed to [U/I] a little bit later. It’ll [POPE] be around tomorrow [March 1] for sure. Thought it [the supply] was gon’ be today.”

57. Based upon my training, experience and knowledge of the investigation – including prior and subsequent intercepted calls, prior and subsequent seizures of narcotics from PULPHUS and his associates, including the March 17 seizure of approximately one kilogram of cocaine from Individual A after meeting with WILLIAMS (described below) – I believe that (a) WILLIAMS distributes cocaine for PULPHUS; (b) WILLIAMS asked PULPHUS if PULPHUS had any cocaine for WILLIAMS to distribute; and (c) PULPHUS informed WILLIAMS that he did not, but that he planned to meet with his narcotics source the following day, March 1, 2019.

58. On or about March 3, 2019, at approximately 7:59 a.m. (TP6 Session 737), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1.<sup>14</sup> During their conversation, PULPHUS stated, “Yeah, shit, I’m on the phone with

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Residence 1. According to law enforcement databases, WILLIAMS provided this address to law enforcement as his residential address on or about April 24, 2010. Furthermore, according to Metro PCS, telephone number Williams Phone 1 is subscribed to “Derrell WILLIAMS.”

<sup>14</sup> Agents identified WALLS as the user of Walls Phone 1 on March 13, 2019. As described below, on that date, the user of Walls Phone 1 arranged to meet PULPHUS at 4834 South Michigan Avenue in Chicago to conduct a narcotics transaction, and surveillance officers

this n\*\*\*a [PULPHUS's narcotics source (POPE or one of his associates)] now. Gonna be this afternoon [PULPHUS will obtain narcotics from POPE later that day].” WALLS responded, “Alright.” PULPHUS continued, “Or it be this morning. I’m fina see. I told him I was going to church, so I’m finna see what [U/I]...They might just come, I’mma see. But I know, this afternoon be the latest though [PULPHUS's narcotics source will be there to meet with him that day]. So it’s all good.”

59. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; subsequent surveillance of WALLS and PULPHUS meeting multiple times after coordinating a hand off, including surveillance of April 2 and 10, 2019 handoffs of objects consistent in size and shape to kilogram quantities of cocaine; and the April 10, 2019 seizure from JOHNSON of 994.8 grams of cocaine tightly wrapped in dark colored plastic similar in shape and appearance to the object WALLS had obtained from PULPHUS earlier that day, following PULPHUS's meeting with POPE earlier that day – I believe that (a) WALLS distributes cocaine for PULPHUS; (b) PULPHUS told WALLS he expected to meet with his supplier (POPE) to obtain more cocaine that afternoon; and (c) PULPHUS was in communication with his source of cocaine supply regarding their impending narcotics transaction, using a phone other than Target Phone 5 or 6.

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observed WALLS, driving Walls Vehicle 1, registered to “Deshawn WALLS,” meet with PULPHUS at that designated place and time. Surveillance officers viewed an Illinois Secretary of State photograph of WALLS and determined it to be the person they observed meeting with PULPHUS on March 13, 2019.

60. On March 3, 2019, at approximately 3:45 p.m. (TP6 Session 759), WALLS, using phone number Walls Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation, PULPHUS stated, “Probably in the next hour and a half, man. They a little behind. N\*\*\*\*\* overslept, man [POPE would likely arrive for their narcotics transaction in the next hour and a half because he is running late].” WALLS stated, “Alright, I’m downtown.” PULPHUS responded, “He was like, ‘6:00 at the latest’ [referring to a conversation PULPHUS had with his narcotics source].”

61. Between approximately 12:30 p.m. and 4:49 p.m., court-authorized location information for Pope Vehicle 1 showed that the vehicle had traveled approximately 300 miles from Marion, Illinois, to Monee, Illinois, in the direction of the Riverdale truck yard.

**B. PULPHUS obtains a shipment of cocaine met from POPE at the Riverdale truck yard (March 3, 2019)**

62. On or about March 3, 2019, at approximately 5:10 p.m., surveillance observed Pope Vehicle 1 pull into the Riverdale truck yard. Shortly after his arrival, surveillance camera footage captured POPE exit the driver’s door, retrieve two large and apparently heavy black bags from the truck’s trailer, place the bags in the front passenger’s side of the semi-truck, and re-enter the semi-truck on the driver’s side.

63. At approximately 5:25 p.m., surveillance observed PULPHUS, driving Pulphus Vehicle 1, enter the truck yard and park in front of Pope Vehicle 1. Surveillance observed POPE and PULPHUS exit their respective vehicles, each

carrying duffle bags. Surveillance observed them exchange duffle bags and then re-enter their respective vehicles.

64. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, the events observed on surveillance, the kilogram quantity seizure of cocaine from PERKINS on February 9, subsequent seizures of cocaine following similar meetings between PULPHUS and POPE at the Riverdale truck yard, and POPE's handling of the two large and cumbersome black bags inside of the cab of his truck, I believe that PULPHUS met with, and obtained a duffle bag containing bulk quantities of cocaine from, POPE in exchange for a duffle bag containing money.

**C. PULPHUS distributed cocaine to WILLIAMS (March 5, 2019)**

65. Two days later, on March 5, 2019, at approximately 12:08 p.m. (TP6 Session 982), WILLIAMS, using Williams Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation, PULPHUS asked, "Where you at with it, D-ski?" WILLIAMS stated, "I made it back to the 100s [referring to the South side of Chicago, Illinois]. Where you at?" PULPHUS stated, "Right here in the hood." WILLIAMS responded, "On 60 something [referring to 6000 south]?" PULPHUS stated, "Yep. Where you at, your mama house?" WILLIAMS responded, "Yeah." PULPHUS continued, "Alright. Give me about 15 [minutes]. I'm finna slide through there."

66. According to court-authorized location information for Target Phone 6, at approximately 11:10 a.m., Target Phone 6 was located in the vicinity of the Beach

Drive condo, and at approximately 12:20 p.m., Target Phone 6 was located in the area of 68<sup>th</sup> Street and Elizabeth Avenue, which is in the general vicinity of the Carpenter Residence (where PULPHUS had met with PERKINS on February 9, 2019, prior to LEOs' seizure of a kilogram of cocaine from PERKINS).

67. At approximately 12:30 p.m. (TP6 Session 985), PULPHUS, using Target Phone 6, called WILLIAMS, who was using Williams Phone 1. As WILLIAMS answered the call, PULPHUS stated, "At your door." WILLIAMS stated, "Alright, come on in."

68. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, the events observed on surveillance, prior and subsequent seizures of cocaine from members of the Pulphus DTO and his associates following similar meetings between PULPHUS and POPE at the Riverdale truck yard, including the March 17 seizure of approximately one kilogram of cocaine from Individual A after meeting with WILLIAMS (described below), I believe that, after this call, PULPHUS met with WILLIAMS near the Carpenter Residence and gave WILLIAMS a quantity of the cocaine that PULPHUS obtained from POPE on March 3, 2019.

#### **IV. PULPHUS obtains a cocaine shipment from POPE (March 13, 2019)**

69. On or about March 13, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to the delivery, BOWDEN and HOWARD inquired of the status of the Pulphus DTO's anticipated cocaine resupply and advised they were prepared to distribute, and PULPHUS advised BOWDEN that



the resupply would be a smaller than normal five kilograms. After the transaction with POPE, PULPHUS distributed a portion of that cocaine shipment to WALLS near Bowden Residence 1, then took another portion to BOWDEN at Bowden Residence 1.

**A. PULPHUS, BOWDEN, and HOWARD discuss PULPHUS's plans to obtain another cocaine shipment from POPE (March 11 to 13, 2019)**

70. On March 11, 2019, at approximately 8:58 p.m. (TP6 Session 1403), PULPHUS, using Target Phone 6, called BOWDEN, who was using Bowden Phone 1. During their conversation:

a. BOWDEN stated, "I'm ready for cuzzo, shit. That's what I'm waiting on. You partied all weekend. I slept all weekend." PULPHUS responded, "What's so crazy though, he said it got tight as hell [referring to PULPHUS's cocaine source]. That's the killer part. . . . Yeah, it dried up like a motherf\*\*\*er around a motherf\*\*\*er, man. [PULPHUS explaining his source, POPE or one of POPE's associates, does not have access to a high quantity of narcotics at this time]. . . . But you know, he finna slide on him. [PULPHUS's narcotics source is going to obtain narcotics from the source of narcotics supply.] You know what I'm saying? He said, 'It be a smaller dig [PULPHUS's narcotics source will not have the same quantity of narcotics for PULPHUS], you know what I'm saying?'" BOWDEN responded, "Right." PULPHUS stated, "Probably be a five [five kilograms of narcotics] or something. You know what I'm saying?"

b. BOWDEN stated, "Yeah. But he [PULPHUS's narcotics source] said he coming though?" PULPHUS responded, "Oh, yeah, man. I spoke to his ass

this morning, man. I thought he was gonna come probably today. [PULPHUS thought his narcotics source was going to meet with him today]. He sliding on dude tomorrow—I mean now [PULPHUS’s narcotics source is going to obtain the narcotics from his supplier]. He said, ‘Dude might call and make it [the narcotics transaction with PULPHUS] tomorrow.’ BOWDEN responded, ‘Okay.’ PULPHUS stated, ‘Wednesday [March 13] be the latest though. Yeah, hell yeah.’ BOWDEN asked, ‘But it gonna be a short order [a smaller quantity of narcotics] or something?’ PULPHUS responded, ‘Oh yeah. Hell yeah. I said, ‘Damn, sometime it be cool. [It’s okay to conduct a smaller quantity narcotics transaction from time to time]. I don’t be giving a f\*\*\*.’ BOWDEN stated, ‘Yeah, as long as a motherf\*\*\*er get something, [as long as they have an amount of narcotics to distribute] but damn...’ BOWDEN continued, ‘A little something is better than nothing, boy.’

71. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, and the events observed on surveillance, including PULPHUS’s previous meetings with POPE, the kilogram quantity seizure of cocaine from PERKINS on February 9, and subsequent seizures of cocaine following similar meetings between PULPHUS and POPE at the Riverdale truck yard, I believe that (a) PULPHUS told BOWDEN that he planned to meet with POPE to obtain cocaine no later than March 13, 2019; and (b) PULPHUS expected, based on communication with POPE, that the quantity would be less than usual, estimating five kilograms of cocaine.

72. On March 13, 2019, at approximately 10:13 a.m. (TP6 Session 1584), BOWDEN, using Bowden Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation, BOWDEN asked, “How we looking?” PULPHUS responded, “It’s [PULPHUS’s narcotics transaction with POPE, his narcotics source] gonna be today.” BOWDEN stated, “Okay, good, good. Alright. I’m ready.”

73. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, the events observed on surveillance, described below, I believe that PULPHUS communicated to BOWDEN that his source of narcotics (POPE) would meet with him (PULPHUS) to conduct a transaction later that day.

74. On or about March 13, 2019, at approximately 12:20 p.m., according to court-authorized location information for Pope Vehicle 1, POPE was located in Lafayette, Indiana, driving on Interstate 65 north toward the Riverdale truck yard.

75. At approximately 1:58 p.m. (TP6 Session 1615), PULPHUS, who was using Target Phone 6, had a call with HOWARD, who was using Howard Phone 1. during which HOWARD asked, “What we got up [is cocaine available]?” and PULPHUS stated, “Oh, I ain’t on nothing [PULPHUS was not distributing narcotics at that time]. I’m still laying around waiting on this call, man [PULPHUS was waiting on a call from POPE, his narcotics source].”

**B. PULPHUS obtains cocaine from POPE at the Riverdale truck yard (March 13, 2019)**

76. On March 13, 2019, at approximately 2:28 p.m. – approximately a half hour after PULPHUS’s call with HOWARD – surveillance observed POPE enter the

Riverdale truck yard driving Pope Vehicle 1 and park in the same spot he used during the February 7 transaction with PULPHUS.

77. At approximately 2:31 p.m., surveillance observed POPE exit the semi-truck, put on a pair of gloves, and walk to the rear of the vehicle, where he removed two large rolled up black tarps from the trailer of his vehicle. POPE subsequently carried both large black tarps to the cab of the semi-truck, and placed them behind the front seats. POPE then re-entered the semi-truck, turned to face the back of the cab, removed multiple items from the tarps, and placed those items into a single large black duffle bag.

78. On this same day, at approximately 2:55 p.m., surveillance observed PULPHUS, driving Pulphus Vehicle 1, enter the Riverdale truck yard and park in front of Pope Vehicle 1. At this time, surveillance observed POPE exit Pope Vehicle 1 carrying the large black duffle bag, approach the driver's window of Pulphus Vehicle 1, and pass the black duffle bag through the window to PULPHUS; PULPHUS then handed a red duffle bag to POPE. Surveillance observed PULPHUS and POPE engage in conversation for a short amount of time, and then observed POPE walk back to the freightliner carrying the red colored duffle bag. POPE re-entered the freightliner, placed the red colored duffle bag in the back of the cab of Pope Vehicle 1, and started the vehicle. At this time, PULPHUS exited the truck yard.

79. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, the events observed on surveillance that day, the kilogram quantity seizure of cocaine from

PERKINS on February 9, subsequent seizures of cocaine following similar meetings between PULPHUS and POPE at the Riverdale truck yard, and POPE's handling of the large and cumbersome tarps inside the cab of the semi-truck, I believe that, during this meeting, PULPHUS gave POPE a red duffle bag containing narcotics proceeds in exchange for a black duffle bag containing wholesale quantities of cocaine.

**C. PULPHUS distributed cocaine to WILLIAMS and WALLS, and stored cocaine with BOWDEN at Bowden Residence 1.**

80. Less than ten minutes after his meeting with POPE, at approximately 3:04 p.m. (TP6 Session 1620), PULPHUS, using Target Phone 6, called WILLIAMS, who was using Williams Phone 1. During their conversation, WILLIAMS asked, "Shit, you ready [asking PULPHUS if he has narcotics for WILLIAMS to distribute]?" PULPHUS stated, "Call me when you get around. I'mma be around for a minute." WILLIAMS stated, "Okay. I'mma call in about one hour. I'mma be at my mama's." PULPHUS stated, "Yup."

81. Based on my training and experience, my knowledge of the investigation, including including the previous and subsequent intercepted calls, the events observed on surveillance, prior and subsequent seizures of cocaine from members of the Pulphus DTO and his associates following similar meetings between PULPHUS and POPE at the Riverdale truck yard, including the March 17 seizure of approximately one kilogram of cocaine from Individual A after meeting with WILLIAMS (described below), I believe that, in this call, PULPHUS advised WILLIAMS that he had obtained a shipment of narcotics and that he (PULPHUS) was ready to distribute a portion of those narcotics to WILLIAMS.

82. Less than ten minutes after his meeting with POPE, at approximately 3:07 p.m. (TP6 Session 1622), PULPHUS, using Target Phone 6, had a conversation with WALLS, using Walls Phone 1. During their conversation, PULPHUS asked, “Where you at?” WALLS responded, “Right here on the e-way [expressway]. Where you want me to pull to?” PULPHUS stated, “Just pull up right there by 47<sup>th</sup>. You know by Wabash right quick.” WALLS stated, “By Wabash? Alright. I’m finna get ready to pull up. Oh, it’s traffic. You on Lake Shore Drive yet?” PULPHUS responded, “Nah, man. That why come to 100s.”

83. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; subsequent surveillance of WALLS and PULPHUS meeting multiple times after coordinating a hand off, including surveillance of April 2 and 10, 2019 handoffs of objects consistent in size and shape to kilogram quantities of cocaine; and the April 10, 2019 seizure from JOHNSON of 994.8 grams of cocaine tightly wrapped in dark colored plastic similar in shape and appearance to the object WALLS had obtained from PULPHUS earlier that day, following PULPHUS’s meeting with POPE earlier that day – I believe that, in this call, PULPHUS advised WALLS that he (PULPHUS) had obtained a shipment of cocaine and arranged to distribute a portion of those narcotics to WALLS.

84. At approximately 3:15 p.m. (TP6 Session 1624), PULPHUS, using Target Phone 6, called WALLS, who was using telephone number Walls Phone 1. During their conversation, PULPHUS asked, “Where you at now?” WALLS

responded, "Passing 39<sup>th</sup>. On the e-way. I'm coming up on 43<sup>rd</sup> now. Where you at?" PULPHUS stated, "Where I told you." WALLS stated, "Alright. I'mma pull up right now."

85. According to toll information for Target Phone 8, at approximately 3:19 p.m., Target Phone 8 had a call with BOWDEN that lasted approximately 10 seconds. Based on my training and experience, my knowledge of the investigation, including prior and subsequent intercepted calls between PULPHUS and BOWDEN, subsequent surveillance of PULPHUS and BOWDEN together following cocaine deliveries by POPE, the April 11, 2019 seizure of approximately 78.5 grams of cocaine from HUMPHREY following his hand-to-hand transaction with BOWDEN, and the April 24, 2019 seizure of cocaine and crack cocaine at Bowden Residence 1, I believe that, during this call, PULPHUS arranged to meet BOWDEN at a single family residence located on the 4800 block of South Michigan Avenue in Chicago ("Bowden Residence 1"), where BOWDEN would store a portion of the cocaine that PULPHUS had earlier obtained from POPE.

86. At approximately 3:20 p.m., surveillance observed PULPHUS park Pulphus Vehicle 1 in the area of Bowden Residence 1. Shortly thereafter, surveillance observed a silver Audi registered to WALLS park Walls Vehicle 1 next to Pulphus Vehicle 1. Surveillance observed WALLS, whom they recognized from photographs obtained from law enforcement databases, exit Walls Vehicle 1 and enter the front passenger seat of Pulphus Vehicle 1. WALLS then exited Pulphus Vehicle 1 carrying a duffle bag, re-entered Walls Vehicle 1, and departed the area.

87. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; subsequent surveillance of WALLS and PULPHUS meeting multiple times after coordinating a hand off, including surveillance of April 2 and 10, 2019 handoffs of objects consistent in size and shape to kilogram quantities of cocaine; and the April 10, 2019 seizure from JOHNSON of 994.8 grams of cocaine tightly wrapped in dark colored plastic similar in shape and appearance to the object WALLS had obtained from PULPHUS earlier that day, following PULPHUS's meeting with POPE earlier that day – I believe that, during this meeting near Bowden Residence 1, PULPHUS gave WALLS a portion of the cocaine that PULPHUS had earlier obtained from POPE.

88. At approximately 3:29 p.m., surveillance observed PULPHUS exit Pulphus Vehicle 1 carrying the same large black duffle bag that POPE had given PULPHUS earlier that day, and enter Bowden Residence 1. Approximately 10 minutes later, surveillance observed PULPHUS exit the building empty handed and re-enter Pulphus Vehicle 1.

89. Based on my training and experience, my knowledge of the investigation, including prior and subsequent intercepted calls between PULPHUS and BOWDEN, subsequent surveillance of PULPHUS and BOWDEN together following cocaine deliveries by POPE, the April 11, 2019 seizure of approximately 78.5 grams of cocaine from HUMPHREY following his hand-to-hand transaction with BOWDEN, and the April 24, 2019 seizure of cocaine and crack cocaine at Bowden



Residence 1, I believe that, at that time, PULPHUS met with BOWDEN at Bowden Residence 1 and gave BOWDEN a portion of the narcotics that PULPHUS had earlier obtained from POPE to store inside Bowden Residence 1.

**V. PULPHUS obtains a cocaine shipment from POPE and distributed at least one kilogram of that cocaine to WILLIAMS (March 16, 2019)**

90. As discussed below, on or about March 16, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to meeting with POPE, PULPHUS visited the Beach Drive condo to collect narcotics proceeds. On the following day (March 17, 2019), PULPHUS distributed at least one kilogram of cocaine to WILLIAMS, who in turn distributed approximately 996.7 grams of cocaine to Individual A. Law enforcement subsequently seized that cocaine from Individual A.

**A. PULPHUS collects narcotics proceeds from WILLIAMS to purchase cocaine shipment from POPE (March 16, 2019)**

91. On March 16, 2019, at approximately 8:57 a.m. (TP6 Session 1837), PULPHUS, using Target Phone 6, called WILLIAMS, who was using Williams Phone 1. During their conversation, PULPHUS asked, “You got anything [narcotics proceeds] laying around over there?” PULPHUS continued, “You know, my people [narcotics supplier POPE] finna come back around today. I’m just trying to get whatever I can get [gathering narcotics proceeds]. Just to throw them a little kitty.” WILLIAMS stated, “Oh, you talking about some change? . . . Oh, yeah, I got a nickel [\$5,000] for you.”

92. At approximately 8:59 a.m. (TP6 Session 1839), WILLIAMS, using Williams Phone 1, texted PULPHUS, who was using Target Phone 6. In this text, WILLIAMS wrote, “14238 Maryland [location where WILLIAMS would give \$5,000 in narcotics proceeds to PULPHUS].”

93. At approximately 9:09 a.m. (TP6 Session 1841), PULPHUS, using Target Phone 6, called WILLIAMS, who was using Williams Phone 1. PULPHUS stated, “At your door.” WILLIAMS stated, “Alright,” and their call ended. At this time, according to court authorized location data, PULPHUS was located in the area of Dolton, Illinois.

94. Based on my training and experience, my knowledge of the investigation, including including the previous and subsequent intercepted calls, the events observed on surveillance, prior and subsequent seizures of cocaine from members of the Pulphus DTO and his associates following similar meetings between PULPHUS and POPE at the Riverdale truck yard, including the March 17 seizure of approximately one kilogram of cocaine from Individual A after meeting with WILLIAMS (described below), I believe that (a) PULPHUS told WILLIAMS that he would receive narcotics from his supplier (POPE) later that same day; (b) PULPHUS asked WILLIAMS if he had any narcotics proceeds so that PULPHUS could pay POPE for more narcotics and WILLIAMS responded that he had \$5,000; (c) PULPHUS and WILLIAMS arranged to and did meet that day for PULPHUS to collect \$5,000 in narcotics proceeds from WILLIAMS.

95. After this meeting, according to court authorized location data, PULPHUS was located at three different addresses between approximately 11:08 a.m. and 11:38 a.m., including an address in Darien, Illinois at approximately 11:08 a.m., an address in New Lenox, Illinois at approximately 11:23 a.m., and Bowden Residence 1 at approximately 11:38 a.m. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, surveillance of PULPHUS's and POPE's meeting at the Riverdale truck yard later that day, and the March 17 cocaine seizure described below, I believe that PULPHUS in that time period traveled to various locations, including Bowden Residence 1, for the purpose of collecting narcotics proceeds to provide to POPE later that day.

**B. PULPHUS obtains a shipment of cocaine from POPE at the Riverdale truck yard (March 16, 2019)**

106. On March 16, 2019, at approximately 1:05 p.m., surveillance observed POPE, driving Pope Vehicle 1, enter the Riverdale truck yard. At approximately 1:30 p.m., surveillance observed PULPHUS enter the Riverdale truck yard and, approximately 5 minutes later, exit the lot. At approximately 2:25 p.m., LEOs observed PULPHUS enter the front door of the Beach Drive condo carrying a large black bag.

107. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, prior and subsequent surveillance, the March 17 seizure of approximately one kilogram of cocaine from Individual A described below, and the previous meetings between POPE

and PULPHUS at the Riverdale truck yard (on February 21, March 3, and March 13), I believe that PULPHUS met with POPE at the Riverdale truck yard on March 16, 2019, and obtained from POPE kilogram quantities of cocaine in exchange for narcotics proceeds, which PULPHUS took to the Beach Drive condo for storage.

**C. PULPHUS distributed a portion of the cocaine shipment to HOWARD and discussed with HOWARD his plans to distribute cocaine to WILLIAMS the following day.**

108. On March 16, 2019, at approximately 2:30 p.m. (TP6 Session 1868), PULPHUS, who was using Target Phone 6, had a conversation with HOWARD, who was using Howard Phone 1. During this call, PULPHUS asked, “What you doing?” HOWARD responded, “Yup.” PULPHUS stated, “I’ll be through there [to deliver cocaine in about 20 minutes].” HOWARD stated, “Alright. At approximately 2:48 p.m. (TP6 1871), PULPHUS and HOWARD had a subsequent conversation during which PULPHUS stated, “Hey Rich, have that door unlocked [so that PULPHUS can enter the residence immediately upon his arrival with the cocaine]. I’mma pull up in a minute.” HOWARD stated, “I’m already at the door.” PULPHUS stated, “Alright. Have the mother\*\*\*\*\* unlocked. Alright.” HOWARD stated, “Alright.”

109. Based on my training, experience, and familiarity with this case – including prior and subsequent intercepted calls between PULPHUS and HOWARD regarding, among other things, the collection of narcotics proceeds; prior and subsequent surveillance; subsequent seizures of cocaine from numerous Pulphus DTO members and customers following PULPHUS’s meetings with POPE to obtain cocaine; and HOWARD’s distribution (with PULPHUS) of at least one kilogram of

cocaine to WILLIAMS, which kilogram law enforcement subsequently seized from WILLIAMS's customer (Individual A) – I believe that PULPHUS distributed a portion of the cocaine shipment he had received from POPE to HOWARD, and that PULPHUS instructed HOWARD to leave his door open so that PULPHUS could enter immediately with the cocaine, decreasing the risk surveillance by or contact with law enforcement.

110. On the same day, at approximately 4:49 p.m. (TP6 Session 1876), PULPHUS, using Target Phone 6, had a conversation with HOWARD, using Howard Phone 1. During this call:

a. PULPHUS stated, “Yeah, check this out, Rich [HOWARD]. Yeah, them n\*\*\*\*s [WILLIAMS's customer, Individual A] talking about they're getting in a little late tonight. So I just told them to wait until tomorrow, in the morning sometime [to conduct a narcotics transaction with PULPHUS]. I might go to church, I don't know. I'm saying this here. We got two options. I could have Dave [BOWDEN] to come get the motherfuckers, or if I leave, you gotta stay there, man.” HOWARD responded, “Yeah.”

b. PULPHUS stated, “Ain't no leaving them mother\*\*\*\*\*s [PULPHUS does not want his kilograms of cocaine left with Individual A unmonitored.] You know what I'm saying? Let you make that change in the morning [HOWARD can make money for assisting with the narcotics transaction with WILLIAMS and Individual A]. But if not, I'mma have Dave [BOWDEN] go on and put them up [store the narcotics for PULPHUS's transaction].” HOWARD responded,

“I ain’t going nowhere.” PULPHUS stated, “Alright. You there for the rest of the day?” HOWARD stated, “Yeah.”

c. PULPHUS stated, “Alright. I don’t trust these n\*\*\*\*s [WILLIAMS’s customer, Individual A]. You know what I’m saying?” HOWARD stated, “Yeah, I understand.” PULPHUS stated, “Okay then. I’mma go ahead and get on out of here then. I’m gonna go to the crib. Just hold ‘em til the morning [store the narcotics]. I’ll call you and let you know what’s from there.” HOWARD stated, “Alright. Okay.”

**D. PULPHUS distributes kilogram quantities of cocaine to WILLIAMS, who distributes approximately 996.7 grams of that portion to Individual A (March 17, 2019)**

111. On March 17, 2019, at approximately 12:19 p.m. (TP6 Session 1904), WILLIAMS, using Williams Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation, PULPHUS asked, “How long before y’all be ready?” WILLIAMS responded, “Shit, come drop it [at least one kilogram of cocaine] to me. He [WILLIAMS’s narcotics customer, Individual A] ready now. He just finna give me a ride.” PULPHUS and WILLIAMS arranged to meet.’

112. At approximately 12:32 p.m., (TP6 Session 1908), PULPHUS, using Target Phone 6, called HOWARD, using Howard Phone 1. PULPHUS stated, “Hey, Rich, I’mma shoot right here and see if Rocky over here, and pull right back around.” HOWARD responded, “Alright.” PULPHUS stated, “By the time I pull back, they [WILLIAMS and Individual A] should be ready for us.” HOWARD responded, “Alright.” PULPHUS stated, “Might just leave one [one kilogram of narcotics] there

though. You gotta open it up [referring to the way the narcotics are packaged]. It's two [two kilograms of narcotics] of them, [U/I] one." HOWARD responded, "Alright."

113. At approximately 1:05 p.m., surveillance observed a red minivan bearing a Minnesota license plate ("Individual A Vehicle 1"), parked in the back of a residence on the 10800 block of South Racine Avenue ("Williams Residence 1").

114. At approximately 1:19 p.m. (TP6 Session 1927), PULPHUS, using Target Phone 6, called HOWARD on Howard Phone 1 and stated, "My man had to take a little... Just follow me [in separate vehicles], Rich." HOWARD stated, "Alright." Court authorized location information for Pulphus Vehicle 1 showed that PULPHUS had departed from, Pulphus Residence 1 earlier that morning.

115. At approximately 1:22 p.m. (TP6 Session 1929), PULPHUS, using Target Phone 6, called WILLIAMS, who was using Williams Phone 1. During the call PULPHUS stated, "I'm outside. Pulling up." WILLIAMS stated, "Alright, here I come."

116. At the time of this call, surveillance observed PULPHUS driving a silver BMW SUV, closely followed by HOWARD, who was driving a white van. Surveillance observed PULPHUS pull up in the back of Williams Residence 1, followed by HOWARD, and park his vehicle near the red minivan. After approximately three minutes, PULPHUS and HOWARD both departed the area. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, prior and subsequent surveillance, and the March 17 seizure of approximately one kilogram of cocaine from Individual A described below,

I believe that, at that time, PULPHUS and HOWARD met with WILLIAMS at Williams Residence 1 and gave WILLIAMS at least one kilogram of the cocaine shipment that PULPHUS had obtained from POPE day earlier.

117. Shortly after PULPHUS and HOWARD departed the area, surveillance observed Individual A<sup>15</sup> exit Individual A Vehicle 1 and enter a black Hyundai (“Williams Vehicle 1”) parked nearby. At approximately 1:30 p.m., officers observed both Williams Vehicle 1 (with WILLIAMS and Individual A) and Individual A Vehicle 1 (driven by someone else) depart the area. Surveillance observed both vehicles park near a Jeep Cherokee in a parking lot located at 115th Street and Marshfield Avenue in Chicago. At approximately 2:18 p.m., LEOs observed Individual A exit Williams Vehicle 1 and enter the Jeep Cherokee. Approximately one minute later, surveillance observed Individual A exit the Jeep Cherokee and reenter Individual A Vehicle 1.

118. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, prior and subsequent surveillance, and the March 17 seizure of approximately one kilogram of cocaine from Individual A described below, I believe that, (a) during their meeting either at Williams Residence 1 or inside Williams Vehicle 1, WILLIAMS distributed more than one kilogram of cocaine to Individual A; and (b) during his meeting with the occupants of the Jeep Cherokee, Individual A gave the occupants a portion of the cocaine that he had obtained from Williams.

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<sup>15</sup> Agents identified Individual A later that day, during a traffic stop, when Individual A provided a Minnesota driver’s license, bearing his photograph and name.



119. Soon after this meeting, surveillance observed Individual A Vehicle 1 commit a traffic violation and curbed the vehicle. During their stop, officers requested identification of the three occupants of the red minivan. Individual A provided a Minnesota driver's license, bearing his photograph and name. LEOs searched Individual A Vehicle 1 and discovered a hidden compartment in the rear passenger's side of the vehicle. Inside the hidden compartment, officers recovered a brick-shaped package, wrapped in silver tape, containing a compacted white powdery substance which was analyzed by the Illinois State Police Forensic Science Center and found to contain 996.7 grams of cocaine.

120. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, prior and subsequent surveillance, and the March 17 seizure of approximately one kilogram of suspect cocaine from Individual A described below, I believe that (a) on March 16, 2019, PULPHUS met with, and gave those narcotics proceeds to, POPE at the Riverdale truck yard in exchange for more than one kilogram of cocaine; (b) PULPHUS took some of the cocaine to the Beach Drive condo and some to Pulphus Residence 1 for storage; (c) on the following day, PULPHUS left from Pulphus Residence 1 and met with HOWARD, and subsequently WILLIAMS at Williams Residence 1, and gave WILLIAMS at least one kilogram of cocaine from that POPE shipment; and (d) shortly after he obtained that cocaine from PULPHUS and HOWARD, WILLIAMS met with Individual A and distributed to Individual A at least

one kilogram of cocaine, one kilogram of which was subsequently seized by law enforcement.

**VI. PULPHUS obtained a cocaine shipment from POPE (March 28, 2019)**

121. On or about March 28, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. On the day before and of the delivery, PULPHUS collected narcotics proceeds from WALLS, Individual D, Individual E, and UM8-17. Following the transaction, PULPHUS met with WALLS and BOWDEN, at Bowden Residence 1, to distribute a portion of the cocaine shipment to them.

**A. PULPHUS collects narcotics proceeds from Individual D, Individual E, and UM8-17 to purchase cocaine shipment from POPE (March 27, 2019)**

122. On March 27, 2019, at approximately 10:46 a.m. (TP8 Session 10), PULPHUS, using Target Phone 8, called Individual D, who was using Individual D Phone 1. During their conversation, Individual D stated, “I got a 4 piece [\$4,000 in narcotics proceeds] for you if you need me.” Their conversation continued, and PULPHUS stated, “Alright. I’mma stop your way. Give me a couple hours when I head back towards that way [to meet with Individual D].”

123. At approximately 1:04 p.m. (TP8 Session 24), Individual D, using Individual D Phone 1, called PULPHUS, who was using Target Phone 8. During the conversation, PULPHUS stated, “I’m finna be through [to meet Individual D] in about 10 minutes.” According to court authorized location information for Target Phone 6, at approximately 1:42 p.m., PULPHUS was located in the area of 4607 Lincoln

Boulevard in Richton Park, Illinois, which is in the vicinity of Individual D Residence 1.

124. Based on my training, experience, and familiarity with this case – including prior and subsequent intercepted calls between PULPHUS and Individual D, prior and subsequent surveillance, and subsequent seizure of cocaine from numerous Pulphus DTO members and customers following PULPHUS’s meetings with POPE to obtain cocaine – I believe that (a) after he obtained the cocaine shipment from POPE on March 16, 2019, PULPHUS gave a portion of that shipment to Individual D to sell to others; and (b) on March 27, 2019, at approximately 1:42 p.m., PULPHUS met with Individual D and collected \$4,000 in cash from Individual D’s sale of that cocaine.

125. Between approximately 10:39 a.m. and 2:23 p.m. (TP8 Sessions 7, 14, 35, 41), PULPHUS, using Target Phone 8, had a series of calls with Individual E and UM8-17, in addition to the aforementioned calls with Individual D. During these calls, PULPHUS arranged to meet with Individual E and UM8-17 in turn. According to court authorized location information for Pulphus Vehicle 1 and Target Phone 6, PULPHUS stopped at six different locations between approximately 2:29 p.m. and 10:21 p.m., before finally returning to Pulphus Residence 1 at approximately 10:56 p.m.

126. Based on my training and experience, my knowledge of the investigation, including the previous and subsequent intercepted calls, and the events observed on surveillance and the previous meetings between POPE and

PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13 and March 16), and the previous seizures from PERKINS and Individual A, I believe that (a) PULPHUS met with numerous cocaine distributors of the Pulphus DTO, including Individual D, Individual E, and UM8-17, to collect narcotics proceeds; and (b) PULPHUS returned to Pulphus Residence 1 with the narcotics proceeds he needed to purchase cocaine from POPE the next day.

**B. PULPHUS obtains cocaine shipment from POPE (March 28, 2019)**

127. On March 28, 2019, at approximately 8:41 a.m. (TP6 Session 2551), WALLS, using Walls Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation, WALLS asked, "What you on?" PULPHUS responded, "Just making these last minute rounds before I get over to dude and them [PULPHUS is collecting narcotics proceeds in anticipation of his narcotics transaction with POPE]." WALLS stated, "Alright. I'm finna bump into Mar right now. I'm finna clear you up [provide PULPHUS with narcotics proceeds]." Later during the conversation, PULPHUS and WALLS arranged to meet that same day.

128. At approximately 10:47 a.m. (TP6 Session 2564), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. During their conversation, PULPHUS asked, "Where you at now?" WALLS responded, "Passing up 130. You know Chuck momma house?" PULPHUS stated, "Yeah." WALLS stated, "Right there where you make right turn where that McDonald's at?" PULPHUS confirmed and WALLS stated, "You wanna do that [asking PULPHUS if they can meet]?" PULPHUS stated, "Yeah, that's cool."

129. At approximately 3:06 p.m. (TP6 Session 2587), PULPHUS, using Target Phone 6, called WALLS, using Walls Phone 1. WALLS stated, “I’m on point. I’m waiting on you. [WALLS was ready to meet PULPHUS to conduct a narcotics transaction.]” PULPHUS stated, “Alright. I’ll probably just meet about 4—47<sup>th</sup> somewhere then, off the e-way [expressway].”

130. At approximately 3:43 p.m., court authorized location information for Pulphus Vehicle 1 showed that PULPHUS was located approximately a half mile away from the Riverdale truck yard.

131. Shortly after this time, PULPHUS was observed by law enforcement entering the Riverdale truck yard. PULPHUS subsequently parked Pulphus Vehicle 1 in front of POPE’s Pope Vehicle 1. Approximately 2 minutes after PULPHUS parked Pulphus Vehicle 1 in front of Pope Vehicle 1, POPE emerged from Pope Vehicle 1 carrying a large white plastic bag. POPE approached Pulphus Vehicle 1 and passed the white plastic bag through the window to PULPHUS, who then handed a large black duffle bag to POPE. POPE subsequently carried the black bag from Pulphus Vehicle 1 to Pope Vehicle 1 and re-entered Pope Vehicle 1.

132. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the events observed on surveillance, and the previous meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13 and March 16), and the previous seizures from PERKINS and Individual A, I believe that, (a) on March 27, 2019, PULPHUS met with WALLS and other Pulphus DTO

members to collect proceeds in advance of his transaction with POPE (b) on March 28, 2019, PULPHUS left Pulphus Residence 1 with the narcotics proceeds to meet POPE at the truck yard; (c) PULPHUS met with POPE at the Riverdale truck yard and provided POPE with a black duffle bag containing narcotics proceeds, in exchange for a white plastic bag containing kilogram quantities of cocaine; and (d) PULPHUS arranged to meet with WALLS shortly thereafter to conduct a narcotics transaction.

**C. PULPHUS distributed cocaine to WALLS (March 28, 2019)**

133. Approximately one half hour after the March 28, 2019 meeting between POPE and PULPHUS, at approximately 4:23 p.m. (TP6 Session 2596), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. During their conversation, WALLS stated, "I'm jumping off the e-way [expressway] right now [to meet with PULPHUS]." PULPHUS stated, "You on Wabash?" WALLS stated, "Yeah, yeah. I'm pulling in right now. I'm finna turn the corner." PULPHUS stated, "Alright. I'll be there in about 3-4 minutes," and continued, "You on what, 4-6, 4-7, 4-8 [what street WALLS is parked on]?" WALLS stated, "I just jumped off on 47<sup>th</sup>. Where do you want me to go?" PULPHUS stated, "Just go, like 4-8. [48<sup>th</sup> Street.]" WALLS stated, "Alright."

134. Approximately two minutes later, surveillance observed WALLS driving Walls Vehicle 1 in the vicinity of 48<sup>th</sup> Street and Wabash Avenue, near Bowden Residence 1. Surveillance then observed WALLS exit his vehicle, enter the front

passenger side of PULPHUS's Pulphus Vehicle 1 and, less than one minute later, exit Pulphus Vehicle 1 carrying a black bag and re-enter Walls Vehicle 1.

135. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; prior and subsequent surveillance of WALLS and PULPHUS meeting multiple times after coordinating a hand off, including surveillance of April 2 and 10, 2019 handoffs of objects consistent in size and shape to kilogram quantities of cocaine; and the April 10, 2019 seizure from JOHNSON of 994.8 grams of cocaine tightly wrapped in dark colored plastic similar in shape and appearance to the object WALLS had obtained from PULPHUS earlier that day (following PULPHUS's meeting with POPE earlier that day) – I believe that PULPHUS met with WALLS near Bowden Residence 1 and gave him a bag containing a wholesale quantity of cocaine.

**D. PULPHUS distributed cocaine to BOWDEN at Bowden Residence 1 (March 28, 2019)**

136. On March 28, 2019, at approximately 4:28 p.m., minutes after meeting with WALLS, surveillance observed PULPHUS exit Pulphus Vehicle 1 carrying a large black bag, and enter BOWDEN's residence at Bowden Residence 1. Several minutes later, PULPHUS was observed exiting BOWDEN's residence empty handed.

137. Based on my training and experience, my knowledge of the investigation, including prior and subsequent intercepted calls between PULPHUS and BOWDEN, subsequent surveillance of PULPHUS and BOWDEN together following cocaine deliveries by POPE, the April 11, 2019 seizure of approximately

78.5 grams of cocaine from HUMPHREY following his hand-to-hand transaction with BOWDEN, and the April 24, 2019 seizure of cocaine and crack cocaine at Bowden Residence 1, I believe that, shortly after obtaining a shipment of cocaine from POPE and distributing a portion of that cocaine to WALLS, PULPHUS brought the remaining portion of that cocaine to BOWDEN for subsequent distribution, and BOWDEN stored it at Bowden Residence 1.

**E. PULPHUS discussed with Individual F the price per kilogram of cocaine.**

138. On March 28, 2019, at approximately 1:30 p.m. (TP8 Session 157), PULPHUS, using Target Phone 8, called Individual F, using Individual F Phone 1. During this call:

a. Individual F asked, “What it’s looking like?” PULPHUS responded, “Shit, I really don’t know, boy. [U/I] it might not be.” Individual F stated, “[U/I] little brother say, ‘Man, go and give him some [U/I] and see what you can do for the four [referring to PULPHUS’s price per kilogram of narcotics for four kilograms of narcotics].” PULPHUS responded, “[U/I] complain too much.”

b. Individual F stated, “Come on, I know, but shit. I just want to try to see what you can do so I can make, so I can make a little something [Individual F wants PULPHUS to give him a reasonable price per kilogram of narcotics so Individual F can make some money selling the product]. I ain’t trying to be greedy.” PULPHUS responded, “I can’t do nothing [PULPHUS can’t lower his narcotics price], n\*\*\*\*, right now, shit. You know what I’m saying? It’s f\*\*\*\*\* up. I’ll give you 31-8



[PULPHUS will sell Individual F narcotics at a rate of \$31,800 per kilogram].” Individual F stated, “That’s too much. Man, that’s strong.”

c. Individual F continued, “Everybody I know [U/I] in the 31, they lower than you are [everyone Individual F knows who distributes narcotics offers narcotics at a lower price compared to PULPHUS]. I’ve never seen that happen! Everybody I know is lower than you.”

## **VII. PULPHUS obtained a cocaine shipment from POPE (April 2, 2019)**

139. On or about April 2, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to that delivery, PULPHUS collected narcotics proceeds from BOWDEN, WILLIAMS and WALLS. After the delivery by POPE, PULPHUS met with WALLS near, and BOWDEN at, Bowden Residence 1 to distribute a portion of the cocaine shipment to both men. On or about April 4, 2019, PULPHUS sold approximately three kilograms of the April 2 cocaine shipment to Individual F for \$92,400.

### **A. PULPHUS collects narcotics proceeds from BOWDEN, WILLIAMS and WALLS to purchase cocaine shipment from POPE (April 1 and 2, 2019)**

140. On April 1, 2019, at approximately 9:22 p.m. (TP6 Session 3045), PULPHUS, using **Target Phone 6**, called WILLIAMS, who was using Williams Phone 1. During their conversation, PULPHUS asked, “You prefer to do that [to meet] in the morning?” PULPHUS continued, “I’m [U/I] late night creep. I’ll get ya out the way [PULPHUS will meet with WILLIAMS sooner rather than later]. If you prefer [to meet] in the morning we’ll do it in the morning.” WILLIAMS and PULPHUS

continued their conversation, and WILLIAMS stated, "Okay. I'll just wait in the morning [to meet] then. Don't worry about it." WILLIAMS added, "I got you. Everything cool though. [WILLIAMS communicated to PULPHUS that he has narcotics proceeds to provide to PULPHUS.]" PULPHUS and WILLIAMS agreed to meet the following morning, and their conversation was concluded.

141. On April 2, 2019, at approximately 8:36 a.m. (TP6 Session 3061), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. During their conversation, PULPHUS stated, "Shit, no later than 5:00 [p.m.], maybe 4:00 [p.m.] [referring to when PULPHUS will conduct a narcotics transaction with his source]." WALLS responded, "Alright. I'm moving around but I'll bump into you before then, waiting on something else. [WALLS will meet with PULPHUS to provide him with narcotics proceeds before PULPHUS conducts his narcotics transaction]." PULPHUS stated, "Okay, it's all good. They [PULPHUS's narcotics source] said before 5:00 [p.m.] so it's all good." Their conversation ended shortly thereafter.

142. On the same day, at approximately 9:06 a.m. (TP6 Session 3072), BOWDEN, using Bowden Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation, PULPHUS stated, "If dude and them [PULPHUS's narcotics source] coming through, man, around 3:00 [p.m.] or 4:00 [p.m.] today, so I'll probably need you to be around if you can." BOWDEN stated, "Bet, shit. You think I ain't? Shit [affirming that he will meet with PULPHUS]." Their conversation concluded thereafter.

143. On the same day, at approximately 3:17 p.m. (TP8 Session 319), PULPHUS, using Target Phone 8, called BOWDEN, who was using Bowden Phone 1. During their conversation, PULPHUS asked, "You can be here by 4:15 [p.m.]?" BOWDEN stated, "Yup."

144. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the events observed on surveillance, and the previous meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13 and March 16), and the previous seizures from PERKINS and Individual A, I believe that PULPHUS notified BOWDEN, WILLIAMS and WALLS that he planned to obtain a cocaine shipment from POPE and arranged to collect narcotics proceeds from each of them.

**B. PULPHUS obtained cocaine from POPE at the Riverdale truck yard (April 2, 2019)**

145. On the same day, at approximately 3:42 p.m., surveillance observed Pope Vehicle 1 enter the truck yard.

146. At approximately 3:50 p.m., surveillance observed PULPHUS driving Pulphus Vehicle 1 enter the Riverdale truck yard, and park in front of Pope Vehicle 1 where POPE was parked. Approximately 10 minutes later, POPE exited Pope Vehicle 1 carrying a large black bag, and approached the front passenger window of Pulphus Vehicle 1. At this time, surveillance observed POPE and PULPHUS engaging in conversation. POPE placed the black bag into Pulphus Vehicle 1 through the front passenger window, and removed a different black bag from Pulphus Vehicle

1. POPE then carried the black bag, which had come from PULPHUS's Pulphus Vehicle 1, to Pope Vehicle 1 and subsequently re-entered the vehicle. PULPHUS then departed from the truck yard.

147. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the events observed on surveillance, and the previous meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13 and March 16), and prior and subsequent seizures from Pulphus DTO members and customers following meetings between PULPHUS and POPE, I believe that POPE gave PULPHUS a black bag containing kilogram quantities of cocaine and PULPHUS gave POPE a bag containing narcotics proceeds.

**C. PULPHUS distributed cocaine to BOWDEN and WALLS and discussed with JOHNSON the cocaine shipment he had just received (April 2, 2019)**

148. On the same day, at approximately 4:04 p.m. (TP8 Session 328), PULPHUS, using Target Phone 8, called BOWDEN, who was using Bowden Phone 1. During their conversation, PULPHUS stated, "Be down there [at BOWDEN's residence, Bowden Residence 1] in about 10 minutes, DB." BOWDEN stated, "Alright," and their conversation ended. On the same day, at approximately 4:27 p.m. (TP8 Session 330), BOWDEN, using Bowden Phone 1, called PULPHUS, who was using **Target Phone 8**. PULPHUS answered the phone and stated, "What's up, ferosh? I'm pulling up [to Bowden Residence 1]." BOWDEN stated, "Alright."

149. At approximately 4:28 p.m., surveillance observed PULPHUS park Pulphus Vehicle 1 across the street from BOWDEN's residence at Bowden Residence 1, exit Pulphus Vehicle 1 carrying a black bag, and subsequently entered Bowden Residence 1.

150. Based on my training and experience, my knowledge of the investigation, including prior and subsequent intercepted calls between PULPHUS and BOWDEN, subsequent surveillance of PULPHUS and BOWDEN together following cocaine deliveries by POPE, the April 11, 2019 seizure of approximately 78.5 grams of cocaine from HUMPHREY following his hand-to-hand transaction with BOWDEN, and the April 24, 2019 seizure of cocaine and crack cocaine at Bowden Residence 1, I believe that, shortly after obtaining a cocaine shipment from POPE, PULPHUS gave all or part of that shipment to BOWDEN to store at Bowden Residence 1 for subsequent distribution.

151. At approximately 4:02 p.m. (TP6 Session 3132), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. During their conversation, PULPHUS stated, "Meet me down on 48th. You know." WALLS responded, "Alright. How long you'll be?" PULPHUS stated, "I'm passing up 147th now, so..." PULPHUS stated, "Be down there cause I gotta keep moving. I'm super [PULPHUS did not want WALLS to make him wait with large quantities of narcotics in his possession]—you know what I'm saying?" WALLS responded, "For sure, for sure."

152. At approximately 4:23 p.m. (TP6 Session 3139), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. During their call, PULPHUS asked, "That was you, just went across Wabash?" WALLS responded, "Yep, I'm on Indiana [Avenue]." PULPHUS stated, "Yeah, I was on 4-7 this time. I thought you was coming up this block." WALLS stated, "Oh, s\*\*t, you right there, where we usually be [referring to the 4700th block of South Wabash Avenue in Chicago, Illinois]?" PULPHUS stated, "Yeah."

153. At approximately 4:25 p.m., surveillance observed WALLS driving Walls Vehicle 1 on the 4700th block of South Wabash Avenue. WALLS parked his vehicle near PULPHUS's vehicle, and subsequently exited. WALLS then approached PULPHUS's vehicle and entered via the front passenger's door. Less than one minute later, WALLS exited PULPHUS's vehicle carrying a large dark-colored object under his arm, which he concealed under his shirt, and re-entered Walls Vehicle 1. WALLS then departed the area. The following are a surveillance photographs of WALLS

concealing under his shirt a large object wrapped in black plastic (consistent with the size of kilogram quantities of cocaine) that he received from PULPHUS:



154. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; prior and subsequent surveillance of WALLS and PULPHUS meeting multiple times after coordinating a hand off, including

surveillance of this April 2 handoff and a April 10, 2019 handoff of objects consistent in size and shape to kilogram quantities of cocaine; and the April 10, 2019 seizure from JOHNSON of 994.8 grams of cocaine tightly wrapped in dark colored plastic similar in shape and appearance to the object WALLS had obtained from PULPHUS earlier that day (following PULPHUS's meeting with POPE earlier that day) – I believe that PULPHUS gave WALLS kilogram quantities of cocaine

155. On the same day, at approximately 4:37 p.m. (TP 8 Session 337), PULPHUS, using Target Phone 8, had a conversation with JOHNSON, using Johnson Phone 1. During the call, PULPHUS stated, “Alright, I said next time you come [next time JOHNSON obtains cocaine from PULPHUS], I'mma knock a G [\$1,000] off that mother\*\*\*\*\* [PULPHUS would discount the price he charged for JOHNSON for the cocaine].” JOHNSON responded, “My shit been super slow [JOHNSON's narcotics distribution activity has been slow]. Huh?” PULPHUS stated, “Might get a 32 on the next one, you know, when they come around [the next shipment of narcotics might go for \$32,000 per kilogram of cocaine].” JOHNSON stated, “Okay.” PULPHUS stated, “Alright, well, I'm super cool. I just got more of it [another shipment of cocaine from POPE] today, so...” JOHNSON stated, “Okay.”

**D. PULPHUS directed HOWARD to obtain narcotics proceeds from BOWDEN (April 3, 2019)**

156. On April 3, 2019, at approximately 7:22 a.m. (TP6 Session 3165), PULPHUS, who was using Target Phone 6, called HOWARD, who was using Howard Phone 1. During this call, PULPHUS stated, “Hey, check this out, Rich. At 8 o'clock or a little before, be right there on 75th. You know where Dave [BOWDEN] be at



[Bowden Residence 1].” PULPHUS continued, “He gonna give you something [narcotics proceeds]. Just put it up until I get around there.” HOWARD stated, “Okay.” PULPHUS stated, “Be out there and put it up [store the narcotics proceeds],” and continued, “Make sure you put that seat belt on and don’t have the damn hood on, man [to avoid any traffic stops or police contact].” HOWARD responded, “Okay.”

157. Later the same day, at approximately 8:03 a.m. (TP6 Session 3170), PULPHUS, who was using Target Phone 6, called HOWARD, who was using Howard Phone 1. During this call, PULPHUS asked, “You saw him [BOWDEN] already?” HOWARD stated, “Yeah, he’s [BOWDEN] sending me the money, gonna meet him now at Walgreens.” PULPHUS stated, “Alright, just put it up [store the narcotics proceeds].”

158. Based on my training and experience and my knowledge of the investigation, including the surveillance of PULPHUS’s transactions with POPE, BOWDEN and WALLS on April 2, 2019, and HOWARD’s participation in the March 17, 2019 distribution to WILLIAMS which resulted in the seizure of approximately 1 kilogram of cocaine, I believe that PULPHUS directed HOWARD to, and HOWARD did, meet with BOWDEN to obtain narcotics proceeds and store them for PULPHUS.

**E. PULPHUS distributed approximately 3 kilograms of cocaine to Individual F (April 4, 2019)**

159. On or about April 4, 2019, PULPHUS, using Target Phone 8, had a series of conversations with Individual F, using Individual F Phone 1, during which they arranged to meet for PULPHUS distribute approximately three kilograms of cocaine to Individual F.

a. At approximately 11:55 a.m. (TP8 Session 459), PULPHUS stated, "I ain't gonna be around that long. Today is the old lady's birthday, so..." Individual F responded, "Okay, I'mma call him [Individual F's customer] now." PULPHUS stated, "2:00 [p.m.]" Individual F responded, "I'mma call him now. You said you all leaving around 2:00?" PULPHUS stated, "Yeah, I'mma be around until 2:00, 2:30 [p.m]."

b. At approximately 12:46 p.m. (TP5 Session 476), Individual F stated, "He [Individual F's customer] just called me to come over there so I'm finna run over there and run through it [Individual F will go to the place where narcotics proceeds are stored and will count the money] and then call you." PULPHUS stated, "Alright."

c. At approximately 1:45 p.m. (TP8 Session 487), Individual F asked, "Where do you want me to come to, cuz?" PULPHUS stated, "What you trying to do [what amount of cocaine does Individual F wants to purchase]?" Individual F responded, "I'll take the tray [3 kilograms of cocaine]." PULPHUS asked, "A tray?" Individual F stated, "Yeah." PULPHUS responded, "Shit, I'll meet you somewhere off by 47<sup>th</sup> right off the E-way somewhere [in the area of Bowden Residence 1]." Individual F stated, "I'm finna jump on [the expressway] right now."

d. At approximately 2:42 p.m. (TP8 Session 504), PULPHUS asked, "You see me, Boo?" Individual F stated, "I don't see you." PULPHUS asked, "You on Wabash?" Individual F stated, "I'm on Wabash." Individual F continued, "On 46<sup>th</sup> like right there by Neveh house. I'm in my Audi." PULPHUS asked, "You see me coming

across the light?” Individual F stated, “I see you. You’re behind that grey car?” PULPHUS stated, “Yeah.”

160. At this time, surveillance observed PULPHUS meet with a man, subsequently identified as Individual F, in a black 2012 Audi hatchback. Surveillance observed PULPHUS and Individual F depart the area shortly thereafter.

161. At approximately 3:04 p.m. (TP8 Session 510), PULPHUS, using Target Phone 8, called Individual F, using Individual F Phone 1. During the conversation:

a. Individual F asked, “You said these the ones though [referring to three kilograms of cocaine that he purchased from PULPHUS], ain’t they?” PULPHUS responded, “You gon’ fall on your ass with them mother\*\*\*\*\*s. That shit will be out like about another hour though [PULPHUS’s cocaine will be sold out].”

b. Individual F stated, “I’ll probably be back tomorrow though [to purchase more cocaine from PULPHUS].” PULPHUS stated, “It probably be a few days after this one [until PULPHUS gets re-supplied with narcotics]... This shit ain’t gonna sit around.” Individual F responded, “I know it ain’t, but I’mma call you just in case they come through right now [Individual F will call PULPHUS if he gets the money to purchase more cocaine from PULPHUS]. I’mma call you.” PULPHUS asked, “That was 92-4 [\$92,400 in narcotics proceeds] you gave me?” Individual F asked, “92 what?” PULPHUS responded, “That was 92-4 [\$92,400], right? I ain’t go through it.” Individual F stated, “Yeah.”

162. On or about April 5, 2019, at approximately 10:45 a.m. (TP8 Session 534), PULPHUS, using Target Phone 8, called Individual F, using Individual F Phone

1. During the conversation, PULPHUS stated, “Hey, Boo. This money 700 dollars. It’s 91-7 [\$91,700]. It’s supposed to be 92-4 [PULPHUS tells Individual F that he owed PULPHUS \$92,400 for 3 kilograms of narcotics, and that Individual F shorted the money].” Individual F responded, “I thought it was probably gonna be, remember when they said, he said if you do it a dollar off here, he’ll do three [three kilograms at a discounted price per kilogram of narcotics]? I thought you said okay. You ain’t say okay?” PULPHUS responded, “No, I ain’t say that.”

163. On or about April 8, 2019, at approximately 1:24 p.m. (TP8 Session 657), PULPHUS, using Target Phone 8, had a conversation with Individual F, using Individual F Phone 1. During this call:

a. Individual F stated, “Cuz, I was letting you know I ain’t forgot about you. I just...” PULPHUS responded, “You [U/I] gotta borrow me some money now! I’m waiting on you [to pay PULPHUS the money that Individual F shorted him for the 3 kilograms], I’ve been f\*\*\*\*\* up.” Individual F stated, “No, look, if you’d called me, I’d had a [U/I] cash. I wouldn’t of left yo nephew down there like that. No, motha\*\*\*\*\*s hit my motha\*\*\*\*\*n’ car [Individual F was in a car crash after he met with PULPHUS on April 4].” PULPHUS asked, “Yo’ Audi?” Individual F stated, “Hell yeah! \$8,000 worth of damage.”

b. Later during the conversation, Individual F stated, “It’s [Individual F’s Audi is] in the shop now. They put me in a rental, so I’m gonna be out there in a [U/I]. I’m gonna be out there in a little while. I’m gonna prowl on you.”

164. Based on my training and experience, my knowledge of the investigation, including the previous intercepted calls between PULPHUS and Individual F, the previous meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13 March 16, March 28, and April 2), and prior and subsequent seizures of cocaine from Pulphus DTO members and customers following meetings between PULPHUS and POPE, I believe that (a) on or about April 4, 2019, PULPHUS sold approximately three kilograms of cocaine to Individual F at a purchase price of \$92,400 (\$30,800 per kilogram); (b) Individual F paid PULPHUS only \$91,700; and (c) Individual F was late paying PULPHUS the \$700 difference because he got into a car accident.

#### **VIII. PULPHUS obtained a cocaine shipment from POPE April 10, 2019**

165. On or about April 10, 2019, PULPHUS obtained kilogram quantities of cocaine from POPE at the Riverdale truck yard. Prior to meeting POPE, PULPHUS met with WALLS to collect approximately \$20,000 in narcotics proceeds. After the transaction, PULPHUS gave at least approximately 994.8 grams of the cocaine shipment to JOHNSON, and other portions of the cocaine to WALLS and BOWDEN, who stored his portion at Bowden Residence 1. Law enforcement subsequently seized approximately 994.8 grams of cocaine and a handgun from JOHNSON. The following day, BOWDEN sold HUMPREY approximately 78.5 grams of cocaine, which law enforcement subsequently seized.

**A. PULPHUS collects approximately \$20,000 in narcotics proceeds from WALLS to purchase cocaine from POPE.**

166. On or about April 10, 2019, at approximately 11:05 a.m. (TP6 Session 3766), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. During their conversation, PULPHUS asked, “You gonna get that wrapped up yet?” WALLS stated, “Yeah, where you at?” PULPHUS stated, “I’m right here on the block right now.” WALLS stated, “Alright, I’m gonna come around [to meet with PULPHUS].” PULPHUS stated, “I gotta shoot east right fast. Where you gonna go, on the tray?” WALLS stated, “It don’t matter. [U/I] uh, they gave me like 20 grand [\$20,000]. I’m gonna call him. In about 25 minutes, I’m gonna call you so you could pick them up.” PULPHUS stated, “Alright.”

167. At approximately 12:38 p.m. (TP6 Session 3778), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. WALLS answered the phone call and PULPHUS stated, “You want me to come in?” WALLS stated, “Yes, sir.” PULPHUS responded, “Open the door.”

168. At approximately 12:40 p.m., according to court authorized location information for Target Phone 6, PULPHUS was located in the area of West 71<sup>st</sup> Street and South Aberdeen Street in Chicago, Illinois. This location is approximately 0.6 miles away from WALLS Residence 1.

169. Based upon my training, experience, and familiarity with the investigation – including prior intercepted communications between WALLS and PULPHUS; prior surveillance of PULPHUS handing off to WALLS an object consistent in size and shape with kilogram quantities of cocaine on April 2, 2019,

following PULPHUS's meeting with POPE earlier that day – I believe that (a) after he obtained the cocaine shipment from POPE on April 2, 2019, PULPHUS gave a kilogram quantities of that shipment to WALLS to sell to others; and (b) on April 10, 2019, at approximately 12:38 p.m., PULPHUS met with WALLS at WALLS Residence 1 and collected from WALLS approximately \$20,000 in narcotics proceeds from WALLS's sale of that cocaine.

**B. PULPHUS obtains a cocaine shipment from POPE (April 10, 2019)**

170. On April 10, 2019, at approximately 12:33 p.m. (TP8 Session 713), BOWDEN, using Bowden Phone 1, called PULPHUS, who was using Target Phone 8. During their conversation, PULPHUS stated, "Probably roll by about 1:30-2:00 [p.m.]. You gonna be around?" BOWDEN stated, "Oh, hell yeah! 1:30 or 2:00 [p.m.]" PULPHUS stated, "Yeah, they told me between 1:00 or 2:00 [POPE will arrive with cocaine shipment at 1:00 or 2:00 p.m.]."

171. At approximately 2:47 p.m., surveillance observed PULPHUS driving Pulphus Vehicle 1 into the Riverdale truck yard. According to court authorized location information for Pulphus Vehicle 1, PULPHUS left from Pulphus Residence 1 and traveled directly to the Riverdale truck yard. PULPHUS parked in the same spot where he has previously met POPE to conduct several other narcotics transactions (on January 28, February 7, February 21, February 28, March 3, March 13, March 16, March 28 and April 2, 2019). At approximately 2:49 p.m., surveillance observed POPE entering the Riverdale truck yard, driving Pope Vehicle 1, and observed POPE park in the same spot, directly behind PULPHUS's Pulphus Vehicle

1, facing PULPHUS. Approximately 12 minutes later, POPE exited Pope Vehicle 1, approached the front passenger window of Pulphus Vehicle 1, and leaned into the front passenger window of Pulphus Vehicle 1, exchanging a bag for a bag. POPE then carried the bag that he obtained from PULPHUS back to Pope Vehicle 1, and re-entered his vehicle.

172. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the events observed on surveillance, and the previous meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13, March 16, March 28, April 2, and April 10, 2019), and the previous seizures from PERKINS and Individual A, I believe that, during this meeting, PULPHUS gave POPE a bag of narcotics proceeds in exchange for a bag containing kilogram quantities of cocaine.

**C. PULPHUS distributed kilogram quantities of cocaine to WALLS, BOWDEN and JOHNSON, and LEOs seized approximately one kilogram of cocaine and a handgun from JOHNSON.**

173. Following this exchange, PULPHUS exited the Riverdale truck yard and started to place phone calls:

a. At approximately 3:03 p.m. (TP8 Session 715), PULPHUS, using Target Phone 8, called BOWDEN, who was using Bowden Phone 1. During their conversation, BOWDEN asked, “You got it [the cocaine from POPE]?” PULPHUS responded, “[U/I] about 20 minutes [PULPHUS stated he would be at Bowden Residence 1 in 20 minutes].” BOWDEN stated, “Okay, alright.” PULPHUS asked,



“Where you at?” BOWDEN stated, “At the crib [Bowden Residence 1].” PULPHUS stated, “Alright,” and their conversation ended.

b. At approximately 3:05 p.m. (TP6 Session 3793), PULPHUS, using Target Phone 6, called WALLS, who was using Walls Phone 1. WALLS answered the phone and PULPHUS stated, “Shooting down Wabash [referring to 47<sup>th</sup> Street and Wabash Avenue in Chicago near Bowden Residence 1, where PULPHUS and WALLS have previously met to conduct narcotics transactions].” WALLS stated, “Damn! Alright, how long?” PULPHUS responded, “I could wait [to distribute narcotics to WALLS] til later on today...” WALLS stated, “No, no. I just wanna—I could catch you...” PULPHUS stated, “Just hit me later. Let me know.” WALLS stated, “I’m gonna leave [to meet PULPHUS].” PULPHUS stated, “Alright,” and their conversation ended.

c. At approximately 3:13 p.m. (TP8 Session 717), JOHNSON, using Johnson Phone 1, called PULPHUS, who was using Target Phone 8. During their conversation:

i. JOHNSON stated, “Yeah, I’m ready [to pick up cocaine from PULPHUS].” PULPHUS stated, “What you got going on?” JOHNSON stated, “Shit, just gotta do it. Ready to holla at you [pick up cocaine].” PULPHUS asked, “How long will it take you? Over there on 48<sup>th</sup> [Street]. Over on [U/I] [PULPHUS communicating his location to JOHNSON].” JOHNSON stated, “Oh, shit! I’m gonna get myself a— Let me check this shit one more last time, make sure it’s right

[JOHNSON communicated that he needed to count his money for their narcotics transaction one more time to make sure he has enough].”

ii. PULPHUS stated, “Yeah. I’m gonna be another, about 40 minutes [at the location which he previously communicated to JOHNSON]. Probably shoot out here on the 100s [referring to the South side of Chicago]. I’m down this way now.”

**1. PULPHUS delivers at least a kilogram of cocaine to WALLS (April 10, 2019)**

174. At approximately 3:23 p.m. (TP6 Session 3798), WALLS, using Walls Phone 1, called PULPHUS, who was using Target Phone 6. PULPHUS answered the phone and WALLS asked, “Where you at?” PULPHUS stated, “I just pulled on the block. You down there?” WALLS stated, “Yeah, I’m right here.” PULPHUS stated, “Just come on 48<sup>th</sup> [Street]— Just come on 49<sup>th</sup> [Street] this time.” WALLS stated, “Alright,” and their conversation ended. At this time, surveillance observed WALLS driving Walls Vehicle 1. Surveillance also observed PULPHUS repositioning his vehicle on the 4900<sup>th</sup> block of Wabash Avenue in Chicago, Illinois, which is approximately one block away from Bowden Residence 1.

175. At approximately 3:25 p.m., law enforcement observed WALLS park near PULPHUS’s Pulphus Vehicle 1 and exit his vehicle. WALLS approached PULPHUS’s passenger side and entered Pulphus Vehicle 1. Approximately one minute later, surveillance observed WALLS exiting Pulphus Vehicle 1 carrying a large flat object under his arm. WALLS subsequently re-entered Walls Vehicle 1 and departed the area.

176. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; prior and subsequent surveillance of WALLS and PULPHUS meeting multiple times after coordinating a hand off, including surveillance of April 2 and 10, 2019 handoffs of objects consistent in size and shape to kilogram quantities of cocaine; and the April 10, 2019 seizure from JOHNSON of 994.8 grams of cocaine wrapped in a shape and manner similar to the object WALLS had obtained from PULPHUS earlier that day – I believe that, during this meeting, PULPHUS (a) gave WALLS the large flat object that WALLS carried from PULPHUS’s vehicle; and (b) that large flat object was one of several kilograms of cocaine that PULPHUS had obtained from POPE earlier that day.

**2. PULPHUS delivers a portion of POPE’s April 10 cocaine shipment to BOWDEN at Bowden Residence 1 (April 10, 2019)**

177. At approximately 3:27 p.m., surveillance observed PULPHUS drive to the block of 4800 South Michigan and park his vehicle on the street in front of Bowden Residence 1. Surveillance observed PULPHUS exit Pulphus Vehicle 1 carrying a large gym bag in his left hand.

178. At approximately 3:28 p.m. (TP8 Session 720), PULPHUS, using Target Phone 8, called BOWDEN, who was using Bowden Phone 1. BOWDEN answered the phone call and PULPHUS stated, “Open the door, Dave.” At the same time, surveillance observed PULPHUS enter Bowden Residence 1. Court authorized

location information for Bowden Phone 1 showed that BOWDEN was at Bowden Residence 1 at this time.

179. Based on my training and experience, my knowledge of the investigation, including prior and subsequent intercepted calls between PULPHUS and BOWDEN, subsequent surveillance of PULPHUS and BOWDEN together following cocaine deliveries by POPE, the April 11, 2019 seizure of approximately 78.5 grams of cocaine from HUMPHREY following his hand-to-hand transaction with BOWDEN, and the April 24, 2019 seizure of cocaine and crack cocaine at Bowden Residence 1, I believe that, at this time, PULPHUS (a) met with BOWDEN at Bowden Residence 1 and (b) during that meeting, gave BOWDEN a portion of the cocaine shipment that PULPHUS had previously obtained from POPE, to store at Bowden Residence 1 for subsequent distribution.

**3. PULPHUS delivers approximately 994.8 grams of cocaine from POPE's April 10 shipment to JOHNSON (April 10, 2019)**

180. At approximately 3:36 p.m. (TP8 Session 722), PULPHUS, using Target Phone 8, called JOHNSON, who was using Johnson Phone 1. During their conversation, PULPHUS asked, "What do you want me to do, Mohawk?" JOHNSON responded, "I'm pulling it [narcotics proceeds, or money to purchase narcotics] now and after that, walk out the door." PULPHUS stated, "Alright. I'm sitting over here. Come on." JOHNSON stated, "Alright, here I come, Unc."

181. According to court authorized location information for Target Phone 8 and Bowden Phone 1, both PULPHUS and BOWDEN remained located at Bowden Residence 1.

182. At approximately 3:58 p.m. (TP8 Session 723), JOHNSON, using Johnson Phone 1, called PULPHUS, who was using Target Phone 8. PULPHUS answered the phone call and JOHNSON stated, "I'm pulling up, Unc." PULPHUS stated, "Alright. I'm finna come out."

183. At approximately 3:59 p.m. (TP8 Session 726), PULPHUS, using Target Phone 8, called JOHNSON, who was using Johnson Phone 1. During their conversation, PULPHUS stated, "Meet me on the next block." At approximately the same time, surveillance observed PULPHUS exiting Bowden Residence 1 carrying a large bag, and subsequently entering Pulphus Vehicle 1. Based on my training, experience, and familiarity with this case, including the foregoing evidence, subsequent surveillance, and the subsequent seizure of cocaine from JOHNSON, I believe that the bag that PULPHUS carried out of Bowden Residence 1 contained at least approximately 994.8 grams of cocaine.

184. At approximately 4:00 p.m., a black 2008 Saturn SUV ("Johnson Vehicle 1")<sup>16</sup> pulled up near PULPHUS's Pulphus Vehicle 1 in front of Bowden Residence 1 and followed PULPHUS to the 4900 block of South Michigan Avenue.

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<sup>16</sup> According to law enforcement databases, Lawrence JOHNSON is the registered owner of Johnson Vehicle 1. As law enforcement observed JOHNSON exit his vehicle, officers compared the picture of JOHNSON from the Illinois Secretary of State, and positively identified the driver of the vehicle, who met with PULPHUS, to be Lawrence JOHNSON.

185. At this time (TP8 Session 728), PULPHUS, using Target Phone 8, called JOHNSON, who was using Johnson Phone 1, and stated, “Yeah, step on in with me [inviting JOHNSON to get in Pulphus Vehicle 1 with PULPHUS].” JOHNSON stated, “Alright, here I come.”

186. At this time, surveillance observed JOHNSON exit his vehicle, enter the front passenger side of Pulphus Vehicle 1, engage PULPHUS in conversation, and then exit the vehicle carrying the same black bag that PULPHUS had previously carried from Bowden Residence 1 to Pulphus Vehicle 1. JOHNSON re-entered Johnson Vehicle 1 and departed the area.

187. Law enforcement maintained surveillance of JOHNSON as he departed the area. At approximately 4:12 p.m., law enforcement officers observed JOHNSON commit a traffic violation and conducted a traffic stop at East 29<sup>th</sup> Street and South Vernon Avenue in Chicago, Illinois. During this stop:

a. As officers approached JOHNSON’s vehicle, officers observed a firearm (later identified as a black Glock model 27, 40 caliber pistol bearing serial number BWE267) in between the driver’s seat and the center console of the vehicle, which JOHNSON admitted to possessing. Officers temporarily detained JOHNSON for officer safety purposes as they recovered the pistol and continued to conduct their traffic stop.

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During subsequent traffic stop, JOHNSON provided a driver’s license bearing the name “Lawrence JOHNSON” and his photograph.

b. Officers subsequently observed the same black bag they had observed JOHNSON carrying out of PULPHUS's Pulphus Vehicle 1. Based on their prior observations of PULPHUS carrying the same bag out of Bowden Residence 1 (at which LEOs had previously observed PULPHUS deliver bags containing what LEOs believed to be cocaine immediately following meetings with POPE), their prior observations of PULPHUS giving WALLS a large flat object consistent in size and shape to kilogram quantities of cocaine, and prior and contemporaneous intercepted communications between PULPHUS, JOHNSON, and others, officers recovered the black bag and found a rectangular shaped object tightly wrapped in dark colored plastic. The package was similar in size and appearance to the object WALLS had obtained from PULPHUS earlier that day. Agents submitted the rectangular object to the Illinois State Police Forensic Science Center for testing, which found it to contain approximately 994.8 grams of cocaine.

188. At approximately 4:31 p.m. (TP8 Session 748), JOHNSON, using Johnson Phone 1, called PULPHUS, who was using Target Phone 8. During their conversation:

a. JOHNSON stated, "Hey, Unc. Some foul-ass shit just happened to me." PULPHUS asked, "What happened?" JOHNSON stated, "Man, them people just beemed me over [the police pulled him over]." PULPHUS asked, "By your crib? What happened?" JOHNSON stated, "Man, they disarmed me and took the move and let me go [the police recovered his firearm and narcotics]." Their conversation continued as JOHNSON explained being stopped by the police.

b. PULPHUS asked, “You had a thing [firearm] too?” JOHNSON stated “Man, you know I always got it with me, Unc. I don’t pull up without it [the firearm].” PULPHUS responded, “Right. Damn. That shit crazy right there, dog.”

**D. BOWDEN distributes approximately 78.5 grams of cocaine to Edward HUMPHREY (April 11, 2019)**

189. On or about April 11, 2019, at approximately 8:53 a.m. (TP6 Session 3823), PULPHUS, using Target Phone 6, called BOWDEN, who was using Bowden Phone 1. During their conversation, PULPHUS asked, “Where you at?” BOWDEN responded, “Shit, the club. I’m about to meet Porsche [cocaine customer, HUMPHREY], uh, in about 30 minutes.” PULPHUS stated, “What time would you be riding on that building down there? I’ll be over there.” BOWDEN stated, “Uh, I’ll be there about 10:30, 10:45.” PULPHUS stated, “Just call me then.”

190. According to court authorized location information for Bowden Phone 1, BOWDEN was located at Bowden Residence 1 at approximately 8:00 a.m., and traveled to various locations after that, until LEOs saw him meet with HUMPHREY as described below.

191. At approximately 9:57 a.m. (TP6 Session 3830), PULPHUS, using Target Phone 6, called BOWDEN, who was using Bowden Phone 1. During their conversation, PULPHUS stated, “Shit, about to pull up.” BOWDEN stated, “My [U/I] [cocaine customer, HUMPHREY] is about to pull up. He’ll be here right now so I can hit him right back.” PULPHUS stated, “Oh, I thought you had to come to the crib to get it [cocaine].” BOWDEN stated, “Nuh-uh. I already got that [cocaine].” BOWDEN continued, “I told him [HUMPHREY] I gotta be at the crib by 10:15.”



192. Based on my training and experience, my knowledge of the investigation, and the context of the conversation, I believe that BOWDEN communicated to PULPHUS that he planned to conduct a narcotics transaction with an individual whose nickname is “Porsche,” whom agents later identified as HUMPHREY.

193. At approximately 10:05 a.m., surveillance observed BOWDEN sitting in the driver’s seat of Bowden Vehicle 1 on the 700 block of East 87<sup>th</sup> Street in Chicago, and observed a man, later identified as HUMPHREY, pull up to BOWDEN’s vehicle in a tan colored Mercedes Benz. Surveillance observed HUMPHREY exit his vehicle and enter BOWDEN’s vehicle through the front passenger door. Approximately one minute later, HUMPHREY exited BOWDEN’s vehicle and re-entered his Mercedes Benz. Both BOWDEN and HUMPHREY departed the area.

194. At approximately 10:14 a.m., officers observed HUMPHREY commit a traffic violation and subsequently conducted a traffic stop. At this time, officers observed that there was only one person in the vehicle and asked the driver for his identification. At the same time, officers observed a bulge in the driver’s front jacket pocket. The driver identified himself as “Edward” and provided officers with an Illinois driver’s license, bearing the driver’s photograph and the name “E. Patrick Humphrey.” For officer safety purposes, officers conducted a search of HUMPHREY’s front jacket pocket and recovered approximately 2.5 ounces of a white powdery substance. Officers submitted the substance to the Illinois State Police Forensic

Science Center, which found that the substance in total weighed approximately 78.5 grams and contained cocaine.<sup>17</sup>

**IX. TURNER obtains approximately 10 kilograms of cocaine from POPE at the Riverdale truck yard, and attempts to deliver the shipment to PULPHUS (April 24, 2019)**

195. On or about April 24, 2019, TURNER obtained approximately 10 kilograms of cocaine from POPE at the Riverdale truck yard on PULPHUS's behalf, and handed POPE narcotics proceeds in exchange. After the transaction with POPE, TURNER drove to the Beach Drive condo to deliver the cocaine to PULPHUS. Law enforcement stopped TURNER in the condo's parking garage and found him in possession of approximately 10 kilograms of cocaine and a key to PULPHUS's Beach Drive condo (unit 809S). During the drive to the Beach Drive condo, TURNER realized that he was being followed by law enforcement, contacted PULPHUS, and alerted PULPHUS to his imminent arrest. Agents thereafter executed search warrants at the Beach Drive condo, Pulphus Residence 1, and Bowden Residence 1, and recovered (i) tens of thousands of dollars in cash at both PULPHUS locations, (ii) bulk drug paraphernalia at both the Beach Drive condo and Bowden Residence 1, and (iii) approximately 30 grams of crack cocaine and 10 grams of powder cocaine at Bowden Residence 1.

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<sup>17</sup> Illinois State Police Forensic Science Center tested approximately 62.2 grams of the total substance. That portion of the substance contained cocaine. The remaining 16.3 grams was not analyzed.

**A. PULPHUS discusses with WALLS his plans to obtain cocaine from POPE**

196. On April 22, 2019, at approximately 4:15 p.m. (TP6 Session 4499), WALLS, using Walls Phone 1, called PULPHUS, who was using Target Phone 6. During their conversation:

a. WALLS stated, “Just checking in with you, I ain’t heard from you.” PULPHUS stated, “Yeah, man, I been all day fucking with this... I been in the city all day. Yep, yep, any day though [PULPHUS is expecting another narcotics re-supply from POPE any day]. Just working. You know?” WALLS responded, “Fo’ sho’, no doubt, no doubt. Just checking in with you. I ain't on shit, shit I'm chopping the little ones out the way [WALLS is selling smaller quantities of narcotics].”

b. PULPHUS stated, “Thought you were trying to say, say you had something laying around [narcotics proceeds ready for PULPHUS to collect].” WALLS responded, “Oh, I do! I told you once I move, [u/i] once I get you know what, I’m saying it’s all good. It’s still cool. [U/I] I’m just trying to, um, push it off. [WALLS has narcotics proceeds for PULPHUS.]” PULPHUS stated, “Right, right.” WALLS stated, “But we’ll chop it up when we get together.” PULPHUS stated, “Alright,” and their conversation concluded.

197. Based upon my training, experience, and familiarity with the investigation – including prior and subsequent intercepted communications between WALLS and PULPHUS; prior surveillance of WALLS obtaining from PULPHUS objects consistent in size and shape to kilogram quantities of cocaine, including an April 10 object wrapped in the same manner as 994.8 grams of cocaine seized from

JOHNSON the same day – I believe that (a) WALLS called PULPHUS to ask when PULPHUS would get re-supplied with narcotics; (b) PULPHUS told WALLS that his narcotics source (POPE) would be meeting with him “any day;” and (c) WALLS stated he had narcotics proceeds to provide PULPHUS.

**B. TURNER obtains approximately 10 kilograms of cocaine from POPE at the Riverdale truck yard (April 24, 2019)**

198. On April 24, 2019, at approximately 10:06 a.m., surveillance observed Pope Vehicle 1 enter the Riverdale truck yard. A short time later, law enforcement officers observed a white Toyota Tundra (“Turner Vehicle 1”) driven by a man subsequently identified as TURNER enter the Riverdale truck yard and park near Pope Vehicle 1. Surveillance observed POPE approach Turner Vehicle 1, place a bag inside the front passenger seat of Turner Vehicle 1, retrieve a bag from the rear passenger seat of Turner Vehicle 1, and take the bag back to Pope Vehicle 1. Shortly thereafter, both vehicles departed the area.

199. Based on my training and experience, and my knowledge of the investigation, including the previous and subsequent intercepted conversations, the events observed on surveillance, and the previous meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13, March 16, March 28, April 2, and April 10, 2019), the previous seizures of cocaine from Pulphus DTO members and customers, and the subsequent seizure of approximately 10 kilograms of cocaine from TURNER following this meeting, I believe that, during this meeting, TURNER gave POPE a bag of narcotics proceeds in exchange for a bag containing approximately 10 kilograms of cocaine.

200. Agents maintained surveillance of TURNER and observed TURNER drive directly from the Riverdale truck yard to PULPHUS's Beach Drive condo. During this drive, agents observed TURNER driving erratically, over the speed limit, changing lanes multiple times, and taking an indirect route to the Beach Drive condo. Based on my training, experience, and familiarity with this case – including a subsequently intercepted call between PULPHUS and Individual C (discussed below), I believe that (a) TURNER's driving patterns were consistent with counter-surveillance measures used by individuals attempting to identify and evade contact with law enforcement; and (b) TURNER had in fact spotted surveillance agents that were following him at the time.

201. Once at the Beach Drive condo, agents observed the TURNER, still in Turner Vehicle 1, was able to access and enter the building's secured parking garage. Agents followed TURNER into the garage and stopped the vehicle. During this stop:

a. Agents approached the driver and sole occupant, who provided a Texas driver's license and identified himself as Shawn TURNER. Agents observed in plain view a bag, matching the appearance of the bag they observed POPE place inside Turner Vehicle 1, on the floor of the rear passenger compartment of Turner Vehicle 1. Based on their prior observations of POPE giving this bag to TURNER at the Riverdale truck yard (at which LEOs had previously observed PULPHUS on multiple occasions obtain bags containing what LEOs later learned (through seizures) to be cocaine), TURNER's erratic driving as he traveled to the Beach Drive condo consistent with counter-surveillance measures, and TURNER's arrival at, and

ability to access the secured premises of, PULPHUS's Beach Drive condo, agents recovered the bag and found that it contained ten heat-sealed bricks of a white powdery substance.

b. On TURNER's possession, agents found three cellular phones and a security key card required to access PULPHUS's Beach Drive condo parking garage and building, as well as keys to unit 809S (PULPHUS's condo).

202. Agents submitted the white powdery substance found in the ten heat-sealed bricks recovered from TURNER to the Illinois State Police Forensic Science Center, which found that the substance in total weighed approximately 10,002 grams and contained cocaine.

203. According to information provided by Hertz Car Rental, TURNER rented vehicles from the Hertz location at O'Hare International Airport in Chicago approximately 25 times between August 2017 and April 24, 2019. According to information provided by United Airlines, TURNER took the same number of flights to and from Chicago during the same time period. The majority of TURNER's flights to Chicago departed from Houston, Texas.

204. Based on my training and experience, and my knowledge of the investigation – including the prior surveillance of the meetings between POPE and PULPHUS at the Riverdale truck yard (on February 21, March 3, March 13, March 16, March 28, April 2, and April 10, 2019), the previous seizures of cocaine from Pulphus DTO members and customers, TURNER's arrival at and unfettered access to PULPHUS's Beach Drive condo, and the subsequent seizure of approximately 10

kilograms of cocaine from TURNER – I believe that TURNER intended to deliver the approximately 10 kilograms of cocaine seized by law enforcement to PULPHUS.

**C. TURNER alerted PULPHUS to his imminent arrest (April 24, 2019)**

205. At the time that agents had stopped TURNER inside the parking garage of PULPHUS's Beach Drive condo – approximately 11:00 a.m. – law enforcement vehicles and personnel were stationed at the Beach Drive condo and plainly visible. At that same time, court-authorized location information for Pulphus Vehicle 1 showed that PULPHUS was approaching the Beach Drive condo building, and then abruptly changed directions, and got back on the highway going the opposite direction.

206. At approximately 11:12 a.m., PULPHUS, who was using Target Phone 6, had a conversation with FNU LNU, aka “Cletus.” During this call, PULPHUS stated, “Oh man, them people [police] just raided Benny apartment [the Beach Drive condo], dog.” Cletus responded, “What happened? PULPHUS stated, “The Police are raiding the apartment... [Individual B] apartment on 47th.” Cletus asked, “They did?” PULPHUS responded, “They in there right now, man [U/I] with my guy/car [phonetic – possibly referring to TURNER].”

207. At approximately 11:23 a.m., PULPHUS, who was using Target Phone 6, had a conversation with his wife, Individual C, who was using Individual C Phone 1. During the conversation:

a. PULPHUS stated, “He [TURNER] came here today, you know what I'm saying? I don't know what happened. He told me they [law enforcement]

was following them, you know what I'm saying, keep talking to his ass. They follow him [TURNER] all the way into that building [the Beach Drive condo]. He [TURNER] pulled in the garage, about 10 cars [law enforcement vehicles] pulled up. They [TURNER] had so much shit [10 kilograms of cocaine] on the [U/I]. I'm trying to make it to the crib [Pulphus Residence 1]."

b. Individual C responded, "Wow, that's really fucked up. So you don't even – you wasn't with him [TURNER]? Or were you with him?" PULPHUS stated, "No, I weren't with him. I was gon' meet at [U/I] [PULPHUS was going to meet TURNER at the Beach Drive condo]."

c. Later during the conversation, Individual C stated, "They [law enforcement] was waiting in the garage?" and PULPHUS responded, "No, they been following him. All the way from 147th somewhere. The way me and dude [POPE] at the truck stop at [law enforcement followed TURNER from the Riverdale truck yard where PULPHUS routinely met with POPE]. ... Said [U/I] the truck stop, somebody been following him. He [TURNER] called me."

d. Individual C stated, "Well, you need to get rid of the telephone you talking to him [TURNER]. You get rid of the phone?" PULPHUS stated, "I threw that away." Individual C stated, "Right. So where you on your way to? Home [Pulphus Residence 1]?" PULPHUS responded, "Yeah, I'm finna stop by the house to get this little money [U/I]."

e. Later during the conversation, PULPHUS stated, "They got me [law enforcement will arrest PULPHUS], you know what I'm saying?" Individual C



stated, “I just pray to God, don’t say that, Darrin. Please God, don’t say that. I mean, how do you feel? You see anything?” PULPHUS stated, “I’m pretty much sure, babe.” Individual C stated, “You sure? Please don’t say that. You think that that’s what’s happening, you need me to leave the job? Where do you want me to come to?” PULPHUS stated, “Just [U/I] do that [U/I] when I come to the crib. If I make it to the crib. If I can’t call you in the next... when I pull up, you know... You know what I’m saying?” Individual C stated, “Okay.”

f. PULPHUS stated, “If I don’t call you in 15 minutes, you know they in the house, they [law enforcement] got me.” Individual C stated, “But don’t go home.” PULPHUS stated, “I got to. Get that money [approximately \$147,900 in cash, which agents later seized] up out of there and just leave out of there.”

208. Based on my training and experience, my knowledge of the investigation – including court-authorized location information for Pulphus Vehicle 1, previous intercepted conversations, surveillance of TURNER on April 24, 2019, the seizure of 10 kilograms of cocaine from TURNER at the Beach Drive condo, the subsequent seizure of approximately \$147,900 in cash from Pulphus Residence 1, PULPHUS’s familiarity with law enforcement’s pursuit of TURNER from the Riverdale truck yard to the Beach Drive condo (despite not being present), and PULPHUS’s statement to Individual C that he knew what happened to TURNER because “[h]e called me” – I believe that (a) PULPHUS and TURNER had arranged to meet at the Beach Drive condo, where TURNER would deliver the 10 kilograms of cocaine; (b) TURNER spotted law enforcement as they followed him from the Riverdale truck yard to the

Beach Drive condo; (c) TURNER called PULPHUS as law enforcement followed him, to alert PULPHUS that police were following and about to arrest him (TURNER); (d) PULPHUS confirmed that TURNER had been arrested when he observed a large contingent of law enforcement personnel at the Beach Drive condo; (e) PULPHUS relayed what he had learned from TURNER to his wife (Individual C); (f) Individual C told PULPHUS to throw away the phone that he had used to talk to TURNER, and PULPHUS said he had; and (g) PULPHUS stated he was going to Pulphus Residence 1 to gather the approximately \$147,900 in cash that he stored there (which agents later seized) and flee.

**D. Search of the Beach Drive condo, Bowden Residence 1, and Pulphus Residence (April 24, 2019)**

209. On or about April 24, 2019 – following the seizure of approximately 10 kilograms of cocaine from TURNER – agents executed court-authorized search warrants at the Beach Drive condo, Pulphus Residence 1, and Bowden Residence 1.

<sup>18</sup> During these searches:

a. At the Beach Drive condo, which was unoccupied at the time of the search, agents found approximately \$67,156 in cash and numerous items used in the packaging of bulk quantities of drugs and narcotics proceeds, including a money counter, a heat sealer machine with plastic bags, a box of broken rubber bands, torn bills, two scales, and various gym bags located throughout the condo. A canine trained

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<sup>18</sup> On or about April 23, 2019, Magistrate Judge Sheila Finnegan granted the government's Application to for a warrant to search the Beach Drive condo (Subject Premises 1); Pulphus Residence 1 (Subject Premises 2), and Bowden Residence 1 (Subject Premises 3).

to detect the scent of narcotics alerted positively in several areas of the apartment, including the kitchen area where the scales were located, the box of rubber bands, the money counter, and the front closet where the money was located.

b. At Bowden Residence 1, agents recovered (i) approximately 30 grams of crack cocaine and 10 grams of powder cocaine; (ii) a black duffle bag (iii) one black digital scale, (iv) two glass measuring cups which, in my experience, can be used to cook crack cocaine from powder cocaine, (v) razor blades, and (vi) pieces of mail addressed to BOWDEN at Bowden Residence 1.

c. At Pulphus Residence 1, agents found approximately \$147,900 in cash, multiple pieces of high price jewelry (valued at approximately \$36,450), eight cellular phones, and one Ruger SR9C 9MM semi-automatic pistol (serial number 33463268).

## **CONCLUSION**

210. Based upon the foregoing, there is probable cause to believe that:

a. From in or about February 7, 2019 to on or about April 24, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, PULPHUS, TURNER, BOWDEN, WALLS, WILLIAMS, JOHNSON, and HOWARD 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, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1), all in violation of 21 U.S.C. § 846.

b. On or about April 24, 2019, at the Riverdale truck yard, in the Northern District of Illinois, Eastern Division, and elsewhere, POPE did knowingly and intentionally distribute a controlled substance, namely, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

c. On or about February 9, 2019, at Chicago, in the Northern District of Illinois, PERKINS knowingly and intentionally possessed with intent to distribute a controlled substance, namely, a 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

d. On or about April 10, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, JOHNSON did use and carry and knowingly possess a firearm, namely, a Glock model 27, 40 caliber pistol, bearing serial number BWE26, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint; in violation of Title 21, United States Code, Section 846, as charged in Count One of this Complaint; in violation of Title 18 United States Code Section 924(c).

e. On or about April 11, 2019, at Chicago, in the Northern District of Illinois, HUMPHREY knowingly and intentionally possessed with intent to distribute a controlled substance, namely, a quantity of a mixture and substance

containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

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Madison Johnson  
Special Agent, Bureau of Alcohol, Tobacco,  
Firearms & Explosives

SUBSCRIBED AND SWORN to before me on September 17, 2019.

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JEFFREY T. GILBERT  
United States Magistrate Judge