
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TRISTAN CLANTON,
RANDALL LANGSTON,
BRANDON LANGSTON,
HEZEKIAH WYATT,
LENOLIS MUHAMMAD-CURTIS,
also known as "Naheem," and
FRANK THAXTON

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.

From in or about March 2018 to in or about December 2018, at Chicago and Bellwood, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Section

Title 21, United States Code, Section
846

Offense Description

did conspire to possess with intent to distribute and to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I Controlled Substance and an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of U-47700 (3,4-dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide), a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of

cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

BRIAN C. DUDA
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: November 13, 2019

Judge's signature

City and state: Chicago, Illinois

SUNIL R. HARJANI, U.S. Magistrate Judge

Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, BRIAN C. DUDA, being duly sworn, state as follows:

I, Brian C. Duda, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 1999. I am currently assigned to the FBI's Chicago Field Office – West Resident Agency, and my duties include investigating narcotics, firearms, and other offenses committed by individuals and organizations that engage in violent activity. I have received training and have experience investigating violations of federal narcotics and firearms laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, and 846; and Title 18, United States Code, Section 922(g) and 924(c). I have personally been involved in numerous narcotics investigations, and I have participated in numerous investigations in which law enforcement used various investigative techniques, including physical and electronic surveillance methods, the interception of wire and electronic communications, controlled narcotics and firearms transactions, the use of confidential sources, and the analysis of a wide variety of records and data.

2. This affidavit is submitted in support of a criminal complaint against TRISTAN CLANTON, RANDALL LANGSTON, BRANDON LANGSTON, HEZEKIAH WYATT, LENOLIS MUHAMMAD-CURTIS (a/k/a “Naheem”), and FRANK THAXTON (together, the “defendants”). It alleges that beginning no later

than in or about March 2018 and continuing until in or about December 2018, the defendants conspired to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I Controlled Substance and an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide), a Schedule II Controlled Substance; 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of U-47700 (3,4-dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide), a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846.

3. This affidavit is based on, among other things: (a) my personal knowledge of the facts and circumstances of this investigation described below; (b) information provided by other law enforcement officers, including oral and written reports that I have received from other law enforcement officers; (c) information obtained from witnesses, including confidential sources working for the FBI or other law enforcement agencies; (d) telephone records, including subscriber information, toll records, pen registers, trap and trace information, and GPS location monitoring information; (e) lawfully intercepted and consensually recorded communications and meetings; (f) the results of physical surveillance conducted by law enforcement; (g) the results of laboratory analysis; (h) a review of publically accessible social media

accounts and posts; and (i) my training and experience and the training and experience of other law enforcement officers involved in this investigation.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CLANTON, RANDALL LANGSTON, BRANDON LANGSTON, WYATT, MUHAMMAD-CURTIS, and THAXTON with a narcotics conspiracy, 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 offense alleged in the complaint.

FACTS SUPPORTING PROBABLE CAUSE

5. FBI and local law enforcement are investigating TRISTAN CLANTON, RANDALL LANGSTON, and other members of a Chicago-based drug trafficking organization (the “CLANTON DTO”) responsible for distributing over a half kilogram of heroin, at least 474 grams of fentanyl analogue, and quantities of cocaine and other narcotics. The evidence shows that the CLANTON DTO traffics narcotics at three different locations, including Bellwood, Illinois, and two illicit retail markets (“drug spots”) on Chicago’s west side. As discussed below:

a. Information from confidential sources and publically accessible social media posts show that CLANTON, an influential member of the AHK street gang, is the leader of a heroin distribution conspiracy that includes other AHK members.

b. On four separate occasions between March 2018 and June 2018, in Bellwood, CLANTON and RANDALL LANGSTON sold wholesale quantities of fentanyl analogue-laced heroin to an individual who, unbeknownst to them, was a confidential source who was working with law enforcement (CS-2). Over the course of these four transactions in Bellwood, CLANTON and RANDALL LANGSTON sold CS-2 approximately 370 grams of heroin laced with a fentanyl analogue (furanyl fentanyl). These transactions included:

i. On or about March 2, 2018, at the direction of CLANTON, RANDALL LANGSTON sold approximately 55 grams of heroin laced with furanyl fentanyl to CS-2 in exchange for approximately \$3,025. During this same meeting, LANGSTON also collected approximately \$900 from CS-2 in satisfaction of a prior drug debt that CS-2 owed to CLANTON and LANGSTON for a prior narcotics purchase.

ii. On or about April 5, 2018, at the direction of CLANTON, RANDALL LANGSTON sold approximately 104.9 grams of heroin containing furanyl fentanyl and U-47700 to CS-2 in exchange for approximately \$5,775.

iii. On or about May 3, 2018, RANDALL LANGSTON sold approximately 105 grams of

heroin containing furanyl fentanyl to CS-2 in exchange for approximately \$5,775.

iv. On or about June 6, 2018, at the direction of CLANTON, RANDALL LANGSTON sold approximately 105.6 grams of heroin containing furanyl fentanyl to CS-2 in exchange for approximately \$5,775.

c. Between no later than May 2018 and continuing through July 2018, CLANTON and his DTO operated a drug spot near the intersection of Avers Avenue and Roosevelt Road in Chicago (the “Avers drug spot”). At or near this location, as discussed below: (i) on or about May 25, 2018, RANDALL LANGSTON was found in possession of a firearm, which agents believe he was using to protect himself during his drug-trafficking activities at the Avers drug spot; and (ii) on or about July 12, 2018, CLANTON and an unidentified man (UM-1) sold CS-2 approximately 110 grams of heroin laced with a fentanyl analogue, and approximately 10 grams of FUB-AMB (a Schedule I synthetic cannabinoid) and U-47700 (a Schedule I synthetic opioid).

d. Between no later than September 2018 and continuing through December 2018, CLANTON, RANDALL LANGSTON, BRANDON LANGSTON, WYATT, and other members of the DTO operated a second drug spot on the 900 Block of North Hamlin Avenue (the “North Hamlin drug spot”). At or near this location, as discussed below: (i) on or about September 27, 2018, RANDALL LANGSTON sold approximately 99.3 grams of a fentanyl analogue to CS-2; (ii) between October and

December 2018, BRANDON LANGSTON, WYATT, and several other CLANTON DTO members sold over 50 user quantities of narcotics to a confidential source (CS-4) and an undercover agent, over the course of eight separate transactions; (iii) between September and October 2018, MUHAMMAD-CURTIS and THAXTON provided armed security for the sale of narcotics at the North Hamlin drug spot, including approximately 98.9 grams of heroin and 15.5 grams of cocaine seized from a drug spot stash house on October 16, 2018; and (iv) on or about December 7, 2018, CLANTON and WYATT were found at a North Hamlin drug spot stash house with approximately 23.3 grams of heroin and 20.3 grams of U-47700.

I. BACKGROUND OF THE AHK STREET GANG AND THE CLANTON DTO

6. Based on my experience and familiarity with this investigation, including information from the confidential sources discussed below and from local law enforcement specializing in gang investigations, the AHK street gang (or “AHK”) is based in Bellwood, Illinois, and traffics narcotics throughout the Chicago area. AHK is comprised of former members of the Black P Stones, Gangster Disciples, and Four Corner Hustler gangs.

A. Confidential Sources Identify CLANTON as the Leader of an AHK Crew that Distributes Heroin at Two Drug Spots on Chicago's West Side

7. In the course of the investigation, agents have interviewed at least two confidential sources (CS-1¹ and CS-2²) who have known multiple AHK members for several years. According to CS-1 and/or CS-2:

a. CLANTON, RANDALL LANGSTON, and BRANDON LANGSTON are all AHK members, and CLANTON recently took over as a leader within the AHK gang.

b. AHK members are involved in the distribution of controlled substances (including heroin, cocaine, MDMA, Xanax, and cannabis), firearms

¹ CS-1 cooperated with law enforcement from approximately July 2017 through July 2018. In or around July 2018, CS-1 was deactivated as a law enforcement source because CS-1 did not respond in a timely manner to investigators' attempts to contact CS-1. CS-1 began cooperating with law enforcement again in or around April 2019, but was subsequently closed again in June 2019, following CS-1's arrest for Aggravated Battery with a Firearm. CS-1 was cooperating with the FBI for monetary compensation, and was paid approximately \$5,900, during CS-1's cooperation. A criminal history inquiry revealed that CS-1 has 15 arrests and nine convictions, to include a weapon offense, dangerous drugs, damage to property, invasion of privacy, and obstruction. Information provided by the CS-1 has proven to be reliable and has been corroborated through surveillance, controlled purchases of narcotics and other information gathered in this investigation.

² CS-2 was arrested by local police in late 2017 for narcotics offenses and agreed to cooperate with law enforcement in the hope that his/her cooperation will be considered by the government in its decision as to what charges, if any, to file against CS-2. CS-2 later agreed to cooperate with the FBI in exchange for monetary compensation. Before his arrest in 2017, CS-2 sold distribution quantities of heroin to a law enforcement source in two separate transactions. To date, CS-2 has not been charged for those transactions. The government has not made any promises to CS-2 other than to take his cooperation into account when deciding what, if any, charges to file against CS-2. To date, CS-2 has been paid approximately \$21,000. According to a criminal history inquiry, CS-2 has no prior felony convictions and several prior narcotics arrests. The information provided by CS-2 in this investigation has been significantly corroborated by consensually recorded communications, physical surveillance, controlled purchases of narcotics, seizures of narcotics and narcotics paraphernalia, and other evidence in this investigation. I therefore believe the information provided by CS-2 to be reliable.

trafficking, robbery, money laundering, identity theft, and fraud. CLANTON recruits new members and controls the gang's illegal activities.

8. According to CS-2, the AHK gang has several "crews," one of which is led by CLANTON and mainly focused on heroin distribution. CS-2 advised that RANDALL LANGSTON and BRANDON LANGSTON work for CLANTON, distributing heroin and picking up narcotics proceeds from street dealers. As discussed in detail below, CS-2 also advised that CLANTON and his crew distribute heroin at drug spots located near the intersection of Avers Avenue and Roosevelt Road in Chicago, as well near the intersection of Hamlin Avenue and Augusta Avenue in Chicago, and that CLANTON tasked RANDALL LANGSTON with managing the drug spots.

B. Social Media Posts Capture CLANTON, RANDALL LANGSTON, and Other AHK Members Holding Guns and Drugs

9. In the course of the investigation, agents have located several publicly accessible photos posted on social media accounts, capturing CLANTON, RANDALL LANGSTON, and other members of the AHK gang posing with narcotics and firearms. For instance:

a. On or about August 21, 2017, an unidentified individual posted the following photo to the publicly viewable portion of an Instagram account that includes the phrase "ahkcity."



Based on a comparison of this photo to a photo of CLANTON's Illinois driver's license maintained by the Illinois Secretary of State, agents identified the individual on the far right of the photo as CLANTON. In this photo, CLANTON is standing next to six other men, three of whom are holding what appear to be firearms and one of whom (the man second from the left in the back row) is holding a large bag of what appears to be marijuana. Another large bag of what appears to be marijuana rests on the kitchen counter around which all the men are standing.

b. On or about June 22, 2018, RANDALL LANGSTON posted a video to the publicly accessible portion of a Facebook account in his name ("R. Langston Facebook Account 1").³ The URL for R. Langston Facebook Account 1

³ Agents identified RANDALL LANGSTON as the user of R. Langston Facebook Account 1 as follows: The Facebook user profile for R. Langston Facebook Account 1 identified the user of the account to be "Randall Langston." The publicly accessible Facebook Wall of the account posts several pictures and videos of a man posing either alone or with other individuals. After viewing these photos on R. Langston Facebook Account 1, agents reviewed an Illinois driver's license photograph of "Randall Langston" maintained by the Illinois Secretary of State, and

contains the phrase “ahkcity,” which I believe is a reference to the AHK street gang. In that video, RANDALL LANGSTON is captured holding what appears to be multiple \$100 bills and a Glock semi-automatic handgun. Above the link to the video, RANDALL LANGSTON wrote, “We [emojis] just hit a lick [drug deal or robbery] for [dollar bill emojis].”⁴ Below are two screen shots from that video.

based on that review, positively identified the man in these photos and videos as RANDALL LANGSTON.

⁴ The investigation has included the recovery of posts, photos, and videos from publically accessible portions of social media accounts, the use of court-authorized interceptions of communications over a cellular telephone used by RANDALL LANGSTON, and consensual audio and video recordings made by confidential sources and an undercover law enforcement officer (collectively, the “recorded conversations”). Some of the 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 on 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 information received from the confidential sources, the contents and context of the recorded conversations, controlled narcotics purchases, events occurring 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.



II. CLANTON AND RANDALL LANGSTON SELL WHOLESALE QUANTITIES OF FENTANYL ANALOGUE-LACED HEROIN TO CS-2 IN BELLWOOD

10. On four separate occasions between March 2018 and June 2018, CLANTON and RANDALL LANGSTON sold wholesale quantities of heroin and fentanyl analogue-laced heroin to CS-2 at a location in Bellwood.⁵ Over the course of these four transactions in Bellwood, CLANTON and RANDALL LANGSTON sold CS-2 approximately 370.5 grams of heroin that was laced with furanyl fentanyl.

A. CLANTON and RANDALL LANGSTON Sell CS-2 Approximately 55 Grams of Fentanyl Analogue-Laced Heroin (March 2, 2018)

11. On or about December 12, 2017, local law enforcement conducted a traffic stop of CS-2's vehicle and seized from the vehicle bags containing white rock-

⁵ CLANTON and RANDALL LANGSTON sold wholesale quantities of narcotics to CS-2 on two other occasions as well: approximately 110 grams of fentanyl analogue-laced heroin at the Avers Avenue drug spot on July 12, 2018, and approximately 99.3 grams of fentanyl analogue at the North Hamlin drug spot on September 27, 2018. Those two transactions are discussed in the latter portion of this affidavit.

like substances and an off-white powdery substance, as well as pills. The ISP laboratory later determined that some of those substances weighed approximately 4.7 grams and contained heroin. Law enforcement also seized approximately \$934 in cash from CS-2's vehicle. Following this arrest and seizure, CS-2 agreed to cooperate with law enforcement. According to CS-2, CS-2 owed CLANTON approximately \$900 in connection with the narcotics seized from CS-2 on December 12, 2017.

12. On or about March 1, 2018, at approximately 12:47 p.m., CS-2 received a consensually captured text message from RANDALL LANGSTON, who was using R. Langston Phone 1.⁶ In this message, RANDALL LANGSTON asked, "What's up with that Lil paper work [drug debt of approximately \$900 that CS-2 owed CLANTON and LANGSTON for narcotics and narcotics proceeds that law enforcement seized from CS-2 during a 2017 arrest that led to CS-2's cooperation]."

⁶ Law enforcement identified RANDALL LANGSTON as the user of R. Langston Phone 1, R. Langston Phone 2, R. Langston Phone 3, and Target Phone 1, and the speaker on the recorded calls summarized in this affidavit, based on the following: CS-2, who has known LANGSTON for years, identified LANGSTON as the speaker on consensually recorded calls with R. Langston Phone 1, R. Langston Phone 2, R. Langston Phone 3, and Target Phone 1. Before the controlled heroin purchases described in this affidavit, the user of R. Langston Phone 1, R. Langston Phone 2, and R. Langston Phone 3 arranged to meet CS-2 at designated times and places. At each of those designated times and places, surveillance observed CS-2 meet with LANGSTON, whom agents recognized based on a review of LANGSTON's driver's license photograph maintained by the Illinois Secretary of State. Law enforcement compared the voice in recorded or intercepted conversations involving R. Langston Phone 1, R. Langston Phone 2, R. Langston Phone 3, and Target Phone 1, with the voice of the individual, identified as LANGSTON, who met with CS-2 during the recorded in-person meetings described in this affidavit, and based on that comparison, determined that LANGSTON was the user of those phones. Target Phone 1, according to AT&T records, is subscribed to RANDALL LANGSTON at the address listed on LANGSTON's Illinois driver's license, and on or about October 23, 2018 (Target Phone 1, session #21112), the user of Target Phone 1 said, "This is Randall." In my training and experience, individuals involved in a drug trafficking organization sometime share phones or phone numbers.

13. At approximately 1:55 p.m., CS-2 had a consensually recorded phone conversation with CLANTON, who was using Clanton Phone 1.⁷ During this call:

a. CS-2 said, “I’m trying to mother fucking, fuck the town up with these two for tens [repackaging two user quantities of heroin into bags that sold for \$10]. . . .” CLANTON replied, “Two for tens don’t work.”

b. Later in the conversation, CS-2 said, “I just talked to them [RANDALL LANGSTON], I told them I’d be ready [to purchase the heroin] in the morning [March 2, 2018] . . . I’m waiting on my [tax refund] check . . . [I]t’s ah, 2875 [\$2,875 for approximately 50 grams of heroin], the nine [\$900 drub debt that CS-2 owed to CLANTON and LANGSTON], and I told him [R. LANGSTON] to give me five more [five more grams of heroin, for a total of 55 additional grams]. . . . So it’s [the amount CS-2 will pay R. LANGSTON] gonna be like forty [\$4,000], forty something [the total amount CS-2 plans to pay to R. LANGSTON will include \$2,875 for the 50

⁷ Law enforcement identified CLANTON as the user of Clanton Phone 1, Clanton Phone 2, Clanton Phone 3, Clanton Phone 4, Clanton Phone 5, and Brandon Langston Phone 2, and the speaker on the recorded conversations summarized in this affidavit based on the following. CS-2, who has known CLANTON for several years, identified Clanton Phone 1, Clanton Phone 2, Clanton Phone 3, Clanton Phone 4, and Clanton Phone 5 as phone numbers used by CLANTON and CLANTON as the speaker on consensually recorded calls with Clanton Phone 1, Clanton Phone 2, Clanton Phone 3, Clanton Phone 5, Brandon Langston Phone 2 and an unrecorded call with Clanton Phone 4. Law enforcement compared the voice in recorded conversations involving Clanton Phone 1, Clanton Phone 2, Clanton Phone 3, and Clanton Phone 5 with the voice of the individual, identified as CLANTON, who met with CS-2 during the July 12, 2018 recorded in person meeting described in this affidavit. As further described in this, a Facebook account in the name of “TRISTAN CLANTON” sent CS-2 the number for Clanton Phone 2 shortly before CS-2 had a consensually recorded call with CLANTON on Clanton Phone 2. Before the July 12, 2018 controlled purchase discussed in this affidavit, the user of Clanton Phone 5 directed CS-2 to meet him at the approximate place that CLANTON (whom agents recognized based on a review of CLANTON’s driver’s license photograph maintained by the Illinois Secretary of State) met with CS-2 moments later.

grams of heroin, approximately \$150 for 5 additional grams of heroin, plus \$900 for the previous drug debt, or just under \$4,000 in total].”

14. Based on my training, experience, and familiarity with this case – including information from CS-2, prior and subsequent recorded calls and texts, and CS-2’s controlled purchase of approximately 55 grams of fentanyl analogue-laced heroin from RANDALL LANGSTON the following day – I believe that, during the aforementioned call, CS-2 advised CLANTON that CS-2 arranged to purchase 55 grams of heroin from LANGSTON and that CS-2 planned to pay LANGSTON approximately \$3,025 for those 55 grams of heroin plus \$900 drug debt that CS-2 owed to CLANTON and LANGSTON.

15. On or about March 2, 2018, at approximately 11:17 a.m., CS-2 had a consensually recorded telephone conversation with RANDALL LANGSTON, who was using R. Langston Phone 1. During this call, LANGSTON told CS-2, “I’m getting ready [to sell CS-2 the heroin] right now. . . . Be like 15, 20 minutes.”

16. On or about March 2, 2018, between approximately 11:42 a.m. and 11:47 a.m., CS-2 exchanged a series of consensually captured text messages with RANDALL LANGSTON, who was using R. Langston Phone 1. During this exchange:

a. RANDALL LANGSTON asked, “How much [money] u got?” CS-2 responded, “[H]ad my count wrong... My tab [\$900 drug debt] and extra 5 [grams of heroin] and bread from last 50 [money for the 50 grams of heroin].” RANDALL LANGSTON asked, “[W]hat that add up to so I can tell bro [CLANTON].”

b. CS-2 stated, “[M]aybe coming to get another 25 [grams of heroin].... I told ali [CLANTON] yesterday or day before I had my tab [\$900 drug debt] n the rest [50 grams of heroin for \$2,875] n extra 5 [grams of heroin for \$150] I added the shit up wrong.”

17. Based on my training, experience, and familiarity with this case – including information from CS-2, prior and subsequent recorded calls and texts, and CS-2’s controlled purchase of approximately 55 grams of heroin from RANDALL LANGSTON later that day – I believe that, during the aforementioned exchange, (a) RANDALL LANGSTON asked CS-2 to tell him how much money CS-2 planned to deliver to LANGSTON, so that LANGSTON could report the amount back to CLANTON; (b) CS-2 advised LANGSTON that s/he planned to pay him approximately \$3,925 in total, approximately \$3,025 of which was for the 55 grams of heroin CS-2 planned to purchase from LANGSTON, and \$900 of which was to pay off CS-2’s prior drug debt to CLANTON and LANGSTON; and (c) CS-2 advised LANGSTON that s/he may want to purchase an additional 25 grams of heroin in the future.

18. About an hour later, at approximately 12:13 p.m., CS-2 had a consensually recorded telephone conversation with RANDALL LANGSTON, who was using R. Langston Phone 1. LANGSTON asked, “Where you at bro?” CS-2 said, “Morris [Avenue in Bellwood, where LANGSTON and CS-2 agreed to meet to conduct the heroin transaction].”

19. At approximately 12:20 p.m., surveillance observed RANDALL LANGSTON arrive in the area of 500 Morris Avenue in a dark sedan, park his vehicle, and enter the passenger side of CS-2's car. Prior to this meeting, agents searched CS-2 and CS-2's vehicle for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-2 with a concealed audio and video recording equipment; gave CS-2 \$3,925 in law enforcement funds, and kept CS-2 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-2's recording device and according to CS-2:

a. CS-2 said, "Let's see what you got." RANDALL LANGSTON gave CS-2 a clear plastic baggie containing a brown powder-like substance. LANGSTON said, "They said it's about an 8 and 9 [the quality of the heroin is an 8 or 9 on a scale of 1 to 10]." CS-2 said, "So about 25 or shit, I'll probably be coming back for another [CS-2 will buy another 50 grams of heroin after he/she purportedly sells 25 of the 55 grams LANGSTON]."

b. After handing CS-2 the baggie, RANDALL LANGSTON observed cash in CS-2's hand and asked, "How much is that?" CS-2 said, "That's ah, . . . thirty-nine twenty-five [\$3,925 for the heroin and CS-2's prior \$900 drug debt]. . . . So I just put down four [\$4,000], I just, took 75 dollars of that [CS-2 took approximately \$75 out of the \$4,000 to arrive at the \$3,925 CS-2 owed for the heroin and prior drug debt]." CS-2 handed LANGSTON approximately \$3,925.

20. At approximately 12:22 p.m., surveillance observed RANDALL LANGSTON exit CS-2's car, return to his vehicle, and depart the area. Following this

meeting, CS-2 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio/video recording devices from CS-2's person and vehicle, and searched both CS-2 and his/her vehicle for contraband and money with negative results. CS-2 gave law enforcement a clear plastic baggie containing a brown powder-like substance, which CS-2 stated he had obtained from RANDALL LANGSTON in exchange for the \$3,925 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 55 grams and contained heroin and furanyl fentanyl, which is a fentanyl analogue currently listed as a Schedule I controlled substance.

21. On or about March 15, 2018, at approximately 11:04 a.m., CS-2 had a consensually recorded phone conversation with CLANTON, who was using Clanton Phone 1. During this call:

a. CS-2 said, "That order [the 55 grams of fentanyl analogue-laced heroin that CS-2 bought from RANDALL LANGSTON on March 2, 2018] was decent. . . . Shit I got like 25 [grams of heroin] left bro. Um, I had called bro phone [RANDALL LANGSTON's phone]. I don't know who the fuck to call [to order more heroin], but shit. . . . I'm gonna call him [RANDALL LANGSTON] and see, . . . 'cause I had, you, know, I been sending that shit [heroin] down to, ah, Wisconsin."

b. CLANTON replied, "[W]hat you want to me to have somebody call you [about selling a new supply of heroin] or something?" CS-2 said, "Yeah I need a number. I don't even know who I suppose to be gettin' up with [supposed to be calling

for heroin].” CLANTON asked, “[W]hat you trying to do?” CS-2 said, “I’m going [to] call him [LANGSTON] I might need a 10 [100 grams of heroin] real quick.” CLANTON said, “I’m gonna call you back in a sec.”

22. About 22 minutes later, BRANDON LANGSTON, who was using Brandon Langston Phone 1,⁸ initiated a series of consensually captured text messages with CS-2. During this exchange, BRANDON LANGSTON stated, “this lil bro [this is BRANDON LANGSTON, RANDALL LANGSTON’s younger brother].” CS-2 replied, “wassup bro[.] was checking didn’t who to call[.] had needed 10 [100 grams of heroin] for someone so need a [phone] number [to call to arrange the heroin purchase].”

23. At approximately 1:10 p.m., CS-2 had a consensually recorded phone conversation with BRANDON LANGSTON, who was using Brandon Langston Phone 1. BRANDON LANGSTON said, “This Ahk little bro [RANDALL LANGSTON’s younger brother], you know who this is?” CS-2 said, “Yeah I’m gonna need to see you all in a minute [to purchase heroin]. . . . So what . . . which number [should CS-2 call]?” BRANDON LANGSTON said, “Call this number right here [Brandon

⁸ Law enforcement identified BRANDON LANGSTON as the user of Brandon Langston Phone 1, Brandon Langston Phone 2, and the speaker on the consensually recorded calls summarized in this affidavit based on the following: CS-2, who knew BRANDON LANGSTON prior to this investigation, spoke with the user of these phones during consensually recorded calls and identified the user as BRANDON LANGSTON. During one of these recorded calls, the user of Brandon Langston Phone 1 identified himself as “Ahk little bro,” meaning – based on my experience and familiarity with this investigation – RANDALL LANGSTON’s little brother. In addition, law enforcement reviewed a prior recorded interview of BRANDON LANGSTON by local police in February 2018, compared his voice with the voices on Brandon Langston Phone 1, Brandon Langston Phone 2, and an intercepted call with phone number XXX-XXX-1681 in which the speaker is introduced as “Brandon,” and determined that the voice on all three phones was BRANDON LANGSTON’s.

Langston Phone 1], and CS-2 said, “It won’t let me call. I just tried to call you.” BRANDON LANGSTON said, “I’m gonna give you other [phone] number then.”

24. Several minutes later, at approximately 1:14 p.m., BRANDON LANGSTON, who was using Brandon Langston Phone 1, sent CS-2 a consensually recorded text, providing the phone number to Brandon Langston Phone 2. CS-2 ultimately did not purchase the narcotics.

25. Based on my training, experience, and familiarity with this case – including information from CS-2 and prior and subsequent recorded calls and texts – I believe that (a) on or about March 2, 2018, RANDALL LANGSTON, at the direction of CLANTON, sold CS-2 approximately 55 grams of fentanyl analogue-laced heroin in exchange for approximately \$3,025; (b) during that same meeting, LANGSTON collected approximately \$900 from CS-2 in satisfaction of a prior drug debt that CS-2 owed to CLANTON and LANGSTON; (c) approximately two weeks later, CLANTON acknowledged that CS-2 received the fentanyl analogue-laced heroin from LANGSTON and still had 25 grams of the narcotic to sell; and (d) when CS-2 advised that he/she wanted to buy an additional 100 grams of heroin, CLANTON put CS-2 in touch with BRANDON LANGSTON, who in turn directed CS-2 to contact him at Brandon Langston Phone 2 to arrange for the purchase.

B. CLANTON and RANDALL LANGSTON Sell CS-2 Approximately 104.9 Grams of Fentanyl Analogue-Laced Heroin (April 5, 2018)

26. On or about April 4, 2018, at approximately 11:29 a.m., CS-2 exchanged consensually recorded Facebook messenger messages with CLANTON, who was

using Clanton Facebook Account 1.⁹ During this exchange, CS-2 stated that Clanton Phone 1 was not working. CLANTON responded with the phone number to Clanton Phone 2.

27. At approximately 11:54 a.m., CS-2 had a consensually recorded phone conversation with CLANTON, who was using Clanton Phone 2. During this call:

a. CS-2 said, “I’m gonna do a 55 [an order of 55 grams of heroin], you just, you throw me a 50 [an additional order of 50 grams of heroin, for a total of 105 grams] you know. . . . I’m tryin’ to bust a power move.” CLANTON asked, “What’d you say, you want a 100 [100 grams of heroin]?” CS-2 said, “Yeah, you can give me ah, 105 [grams of heroin], I’m gonna take 55 [grams], and you can do the 50 [grams] again.” CLANTON said, “[A]lright, I’m gonna throw you an extra 10 [grams of heroin].”

b. Later during the conversation, CLANTON asked, “I’m gonna sell you some extra [heroin] or no?” CS-2 responded, “Alright. . . . Tell them [CLANTON’s drug accomplices] to call me though, you know. . . . I can’t keep up [with all the different phone numbers CLANTON’s drug accomplices are using] for real.”

⁹ Law enforcement identified CLANTON as the user of Clanton Facebook Account 1 based on, among other things: The Facebook user profile for Clanton Facebook Account 1 identified the user of the account to be “Tristan Clanton (AhkCity Ali).” The publicly accessible Facebook profile for the account includes a picture for the account user, and the publicly accessible Facebook Wall of the account posts several pictures and videos of a man posing either alone or with other individuals. After viewing these photos on Clanton Facebook Account 1, agents reviewed an Illinois driver’s license photograph of “Tristan Clanton” maintained by the Illinois Secretary of State, and based on that review, positively identified the man in these photos and videos as CLANTON. In addition, CS-2 identified CLANTON as the user of the account.

CLANTON asked, “What time you gonna be ready [to buy the heroin]?” CS-2 said, “I ain’t ready today.”

28. At approximately 1:41 p.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using R. Langston Phone 1. During this call, CS-2 said, “[F]irst thing in the morning, shit, I be ready for you [ready to complete the 105 gram heroin transaction] . . . He told you my ticket [CLANTON gave CS-2’s heroin order to LANGSTON to fill] . . . I’m gonna grab 55 [grams of heroin], give me a 50 [additional grams of heroin].” LANGSTON replied, “Alright bro.”

29. The next morning, on or about April 5, 2018, at approximately 10:31 a.m. and 10:44 a.m., CS-2 exchanged consensually captured text messages with CLANTON, who was using Clanton Phone 2. During this exchange, CS-2 stated, “I’m . . . about to hit chase [bank to get the money for the heroin] should be like 20 mins tops [until CS-2 is ready to purchase the heroin].” CS-2 also asked, “[T]his Randall [LANGSTON] right . . . or big homie [CLANTON].” Clanton Phone 2 replied, “This big bro [CLANTON].”

30. About a minute later, at approximately 10:45 a.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using R. Langston Phone 1. During this call, LANGSTON asked, “What’s the deal bro?” CS-2 replied that s/he was stopping at the bank to pick up money for the heroin purchase. LANGSTON replied that he was “ready [to sell 105 grams of heroin to CS-2] whenever CS-2 was ready.

31. At approximately 11:25 a.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using R. Langston Phone 1. During this call, LANGSTON confirmed that CS-2 should meet LANGSTON at the same location as the last transaction, namely, the 500 block of Morris Avenue in Bellwood.

32. At approximately 12:10 p.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using R. Langston Phone 1. During this call, CS-2 confirmed the quantity of heroin that LANGSTON planned to bring to their meeting. LANGSTON said, "Yeah, that's what I mean, 105 [grams of heroin]." LANGSTON said he was "loadin' up [picking up the heroin to deliver to CS-2]."

33. At approximately 12:23 p.m., surveillance observed RANDALL LANGSTON arrive in the area of 500 Morris Avenue in Bellwood (the same location as the March 3, 2019 controlled purchase discussed above) and enter the passenger side of CS-2's vehicle. Prior to this meeting, agents searched CS-2 and CS-2's vehicle for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-2 with a concealed audio and video recording equipment; gave CS-2 \$5,775 in law enforcement funds, and kept CS-2 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-2's recording device and according to CS-2:

a. CS-2 said, "Let's see what you got?" RANDALL LANGSTON gave CS-2 a clear plastic baggie containing a brown powder-like substance that

LANGSTON had in his sweatshirt pocket. CS-2 gave LANGSTON approximately \$5,775 in government buy funds, and LANGSTON said, “5775 [\$5,775, the purchase price of the heroin].”

b. CS-2 asked LANGSTON, “Same thing [same quality of heroin as the March 2, 2018 heroin purchase]?” LANGSTON replied, “Yep.”

34. At approximately 12:23 p.m., surveillance observed RANDALL LANGSTON exit CS-2’s car, return to his vehicle, and depart the area. Following this meeting, CS-2 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio/video recording devices from CS-2’s person and vehicle, and searched both CS-2 and his/her vehicle for contraband and money with negative results. CS-2 also gave law enforcement a clear plastic baggie containing a brown powder-like substance, which CS-2 stated he/she had obtained from RANDALL LANGSTON in exchange for the \$5,775 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 104.9 grams and contained heroin and furanyl fentanyl.

35. That evening, at approximately 7:11 p.m., CS-2 had a consensually recorded phone conversation with CLANTON, who was using Clanton Phone 2. During this call, CLANTON asked CS-2 if CS-2 had seen any police earlier, adding, “Little bro [RANDALL LANGSTON] said he seen about ten police when you all got up with each other [to do the heroin transaction earlier that afternoon].” In this call, I believe CLANTON asked CS-2 about the police because CLANTON was aware that

LANGSTON sold CS-2 heroin earlier that day and wanted to know whether the police might have been aware of CLANTON and LANGSTON's drug dealing activities.

36. Based on my training, experience, and familiarity with this case – including information from CS-2, prior and subsequent recorded calls and texts, prior surveillance of RANDALL LANGSTON's meeting with CS-2 earlier that day, and CS-2's controlled purchase of heroin from LANGSTON during that meeting – I believe that (a) after negotiating the sale with CS-2, CLANTON arranged for LANGSTON to deliver approximately 104.9 grams of fentanyl-analogue-laced heroin to CS-2; (b) as directed by CLANTON, LANGSTON later sold the narcotics to CS-2 in exchange for \$5,775 in cash; (c) during that transaction, LANGSTON believed he saw police in the area and relayed what he observed to CLANTON; and (d) CLANTON asked CS-2 whether CS-2 had, like LANGSTON, observed any police during the transaction because CLANTON knew that the heroin transaction that he had arranged that day was illegal and he wanted to avoid detection by law enforcement.

C. RANDALL LANGSTON Sells Approximately 105 Grams of Fentanyl Analogue-Laced Heroin to CS-2 (May 3, 2018)

37. On or about May 3, 2018, at law enforcement's direction, CS-2 contacted RANDALL LANGSTON to set up a controlled purchase of heroin.

38. On or about May 3, 2018, at approximately 10:51 a.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using R. Langston Phone 2. During this call, CS-2 told LANGSTON that he would be "ready [to purchase heroin] in like . . . 15 to 20 [minutes] if you ready." LANGSTON replied, All good." Later during the conversation, LANGSTON and CS-2 agreed to

meet at approximately noon that day at the same location as the previous two controlled purchases: the 500 block of Morris Avenue in Bellwood.

39. At approximately 12:46 p.m., surveillance observed RANDALL LANGSTON arrive in the area of 500 Morris Avenue in Bellwood, park his vehicle, and enter the passenger side of CS-2's car. Prior to this meeting, agents searched CS-2 and CS-2's vehicle for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-2 with a concealed audio and video recording equipment; gave CS-2 \$5,800 in law enforcement funds, and kept CS-2 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-2's recording device and according to CS-2:

a. RANDALL LANGSTON gave CS-2 two clear plastic baggies containing a chunky gray substance. CS-2 stated, "[O]ne motherfucker [fictitious drug customer of CS-2], they was saying they wanted it [the heroin LANGSTON previously sold to CS-2] a little stronger." LANGSTON asked, "Which one [of CLANTON and LANGSTON's prior heroin sales] they talking about?"

b. CS-2 handed LANGSTON approximately \$5,800 in government buy funds. LANGSTON asked, "How much is there?" CS-2 said, "fifty-seven seventy-five [\$5,775]." LANGSTON handed back \$25 in change.

40. At approximately 12:47 p.m., surveillance observed RANDALL LANGSTON exit CS-2's car, return to his vehicle, and depart the area. Following this meeting, CS-2 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio/video recording devices from CS-2's

person and vehicle, and searched both CS-2 and his/her vehicle for contraband and money with negative results. CS-2 also gave law enforcement two clear plastic baggies containing a chunky gray substance, which CS-2 stated he/she had obtained from RANDALL LANGSTON in exchange for the \$5,775 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 105 grams and contained heroin and furanyl fentanyl.

D. CLANTON and RANDALL LANGSTON Sell Approximately 105.6 Grams of Fentanyl Analogue-Laced Heroin to CS-2 (June 6, 2018)

41. On or about June 5, 2018, between approximately 11:13 p.m. and 11:39 p.m., CS-2 exchanged a series of consensually recorded text messages with CLANTON, who was using Clanton Phone 3. During this exchange, CS-2 stated, “Hit u or lil bro [RANDALL LANGSTON] tomorrow[.] aint got number on him [CS-2 wanted to know whether CS-2 should contact CLANTON or RANDALL LANGSTON to purchase heroin tomorrow, and that CS-2 doesn’t have LANGSTON’s new phone number to contact him directly to arrange for purchase].” Clanton Phone 3 responded, “ok.”

42. On or about June 6, 2018, at approximately 4:45 a.m., CLANTON, who was using Clanton Phone 3, sent a consensually recorded text message to CS-2. In this message, CLANTON wrote the phone number for R. Langston Phone 3. Based on my training, experience, and familiarity with this case – including CLANTON’s prior involvement in the controlled purchase of heroin from RANDALL LANGSTON, information from CS-2, and prior and subsequent recorded communications – I

believe that, through this message, CLANTON directed CS-2 to contact RANDALL LANGSTON at R. Langston Phone 3 to arrange for the purchase of additional quantities of heroin.

43. At approximately 10:12 a.m., CS-2 had a consensually recorded phone conversation with CLANTON, who was using Clanton Phone 3. During this call, CLANTON asked CS-2 if CS-2 was “finna get up with Shorty [meet with RANDALL LANGSTON to purchase heroin].” CS-2 told CLANTON that CS-2 was going to meet with LANGSTON.

44. At approximately 10:31 a.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using R. Langston Phone 3. During this call, CS-2 told LANGSTON that CS-2 was leaving Burger King was on his/her way to meet LANGSTON at their usual meeting spot on 500 Morris Avenue in Bellwood. LANGSTON asked, “You want the 100 [grams of heroin], right?” CS-2 replied, “[M]ake it 105 [grams] . . . add an extra 5 [grams of heroin] on there.”

45. Shortly before 11:00 a.m., surveillance observed RANDALL LANGSTON arrive in the area of 500 Morris Avenue in Bellwood and enter the passenger side of CS-2’s car. Prior to this meeting, agents searched CS-2 and CS-2’s vehicle for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-2 with a concealed audio and video recording equipment; gave CS-2 \$5,775 in law enforcement funds, and kept CS-2 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-2’s recording device and according to CS-2:

a. RANDALL LANGSTON, whose face is visible in the recording, handed CS-2 two small bags of a chunky substance wrapped in white plastic bags. CS-2 in exchange handed LANGSTON approximately \$5,775 in government funds that CS-2 had transported in the center console of his/her car.

b. CS-2 asked, “What this [the two bags RANDALL LANGSTON gave CS-2] is?” LANGSTON said, “105 [grams of heroin].”¹⁰

46. At approximately 11:00 a.m., surveillance observed RANDALL LANGSTON exit CS-2’s car and depart the area. Following this meeting, CS-2 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio/video recording devices from CS-2’s person and vehicle, and searched both CS-2 and his/her vehicle for contraband and money with negative results. CS-2 also gave law enforcement two plastic baggies containing a chunky substance, which CS-2 stated he/she had obtained from RANDALL LANGSTON in exchange for the \$5,775 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 105.6 grams and contained heroin and furanyl fentanyl.

47. Based on my training, experience, and familiarity with this case – including information from CS-2, prior and subsequent recorded calls and texts, prior surveillance of RANDALL LANGSTON’s meeting with CI-2 earlier that day, and CS-2’s controlled purchase of fentanyl analogue-laced heroin from LANGSTON during

¹⁰ As discussed below, approximately two weeks before he sold these narcotics to CS-2, RANDALL LANGSTON had been arrested and charged for unlawful gun possession, and was at the time of this drug sale released on bond.

that meeting – I believe that (a) CLANTON placed CS-2 in contact with LANGSTON to arrange for the purchase of additional quantities of heroin; and (b) as directed by CLANTON, LANGSTON later sold approximately 105 grams of heroin to CS-2 in exchange for \$5,775 in cash.

III. DEFENDANTS’ OPERATION OF TWO DRUG SPOTS ON THE WEST-SIDE OF CHICAGO

48. Following their sales of fentanyl analogue-laced heroin to CS-2 in Bellwood, CLANTON and RANDALL LANGSTON began directing CS-2 to purchase narcotics from them at or near two drugs spots that the CLANTON DTO operated on the west side of Chicago: one on the 900 Block of North Hamlin Avenue (near the intersection with Augusta Boulevard), the other near the intersection of Avers Avenue and Roosevelt Road (near Independence Avenue). According to CS-2, CLANTON tasked RANDALL LANGSTON with managing the day-to-day operations of the drug spots. As discussed below, the CLANTON DTO used numerous individuals to traffic hundreds of grams of heroin and other controlled substances to numerous customers, including confidential sources, at these open-air drug markets.

A. Background on the Creation and Use of “Drug Spots” by Drug Trafficking Organizations

49. Through training, experience, law enforcement training publications, and my conversations with confidential sources and other law enforcement officers who have expertise in such matters, I am familiar with the various methods used by narcotics traffickers to transport, store, and distribute narcotics and narcotics

proceeds, including the use of designated locations as “drug spots.” Among other things, I know that:

a. Drug spots are organized street-level retail narcotics markets that operate on a permanent or semi-permanent basis. Drug spots often consist of a group of people working in “shifts” to run the spot, and drug spot workers often work at one or more jobs, such as recruiting buyers on the street, providing security, looking out for law enforcement, collecting money, mixing and packaging narcotics for resale, resupplying street-level dealers and users, and maintaining stash houses to store narcotics and narcotics proceeds.

b. Narcotics traffickers, including drug spot workers, use a number of methods to evade detection by law enforcement, including, for example: using cellular phones or messaging applications registered to fictitious or false names or nicknames; using coded language to identify themselves and to discuss and conduct their illegal activities; frequently changing cellular phone numbers or messaging application accounts, or using multiple phone and messaging accounts simultaneously.

c. Narcotics traffickers often possess firearms to protect themselves during their drug-trafficking activities. Street-level narcotics dealing is a particularly risky type of narcotics distribution in which the participants, including drug-spot workers, often carry, share, and possess firearms to protect themselves from robberies and rival dealers or gang members.

B. The CLANTON DTO Operated the Avers Avenue Drug Spot

50. As discussed below, CLANTON, RANDALL LANGSTON, and other members of the CLANTON DTO operated a drug spot near the intersection of Avers Avenue and Roosevelt Road (the “Avers Avenue Drug Spot”). The evidence shows that (a) the CLANTON DTO used this location to distribute heroin to customers; (b) on or about May 25, 2018, RANDALL LANGSTON was arrested after he was observed near that location in possession of a firearm, which agents believe he was using to protect himself during his drug-trafficking activities at the Avers drug spot; and (c) on or about July 12, 2018, CLANTON and an unidentified individual (UM-1) sold CS-2 approximately 110 grams of heroin containing furanyl fentanyl, and approximately 10 grams of FUB-AMB (a Schedule I synthetic cannabinoid) and U-47700 (a Schedule I synthetic opioid), near the Avers drug spot.

1. Background on the Avers Avenue Drug Spot

51. According to CS-2, CLANTON and his AHK crew distribute heroin to a drug spot located near the intersection of Avers Avenue and Roosevelt Road in Chicago. CS-2 advised that the heroin is packaged for resale in the area near the intersection of Independence Boulevard (the north-south street immediately east or and parallel to Avers) and Roosevelt Road.

52. According to Chicago police reports and information from Chicago police officers:

a. Throughout 2018 and continuing to the present, the area near Roosevelt and Avers, including the blocks immediately adjacent to the intersection to

the west and south, is an area in which organized groups – including factions of the Vice Lords street gang – sell drugs such as heroin, cocaine, PCP, and marijuana to drugs users and customers.

b. From June 2, 2018 through December 14, 2018, Chicago police made approximately 112 arrests for narcotics offenses at or near the intersection of Roosevelt and Avers. Dozens of those arrests were for delivery of heroin, and many others were for the solicitation of narcotics on the public way. The majority of the narcotics arrests were made on the sidewalk or street.

53. Based on my training, experience, and familiarity with this investigation – including police reports, the seizure of a firearm from RANDALL LANGSTON from this area, and CLANTON’s distribution of 110 grams of fentanyl-laced heroin from this area, as discussed further below – I believe the area around Roosevelt and Avers was a drug spot operated in part by the CLANTON DTO.

2. RANDALL LANGSTON Arrested in Possession of a Firearm Near the Avers Drug Spot (May 25, 2018)

54. According to Chicago police reports, Officer A, and officers’ body-worn camera footage, on or about May 25, 2018, CPD officers observed two individuals – later identified by police as RANDALL LANGSTON and Individual A – smoking what appeared to be a marijuana cigar in the area of 13th and Avers Ave in Chicago (near the Avers Avenue drug spot). After seeing police, RANDALL LANGSTON began running down an alley between Avers Avenue and Independence Blvd. Officer A caught up to LANGSTON at the rear of a building and attempted to place him in custody. As Officer A did so, Officer A noticed what appeared to be a handgun in

LANGSTON's waistband. LANGSTON broke free from Officer A and ran back towards the alley and Individual A. As LANGSTON ran, the butt of what appeared to be a pistol was sticking out of LANGSTON's waistband on his right side.

55. According to Officer A and body-worn camera footage, RANDALL LANGSTON and Individual A continued running south down the alley, turned right into a backyard, scaled a railing, and jumped down into the lowered porch and gangway of an apartment building. Officer A arrived at the railing seconds later, jumped down into the porch, and then entered the gangway from the rear (east) in order to apprehend Individual A and LANGSTON. The gangway led west to the front of the building and was blocked by a closed door near the front of the building.

56. According to Chicago police reports, Officer A, and body camera footage while in or near the gangway:

a. Individual A hit the closed door with his shoulder, but the door did not open. At that time, RANDALL LANGSTON removed a black pistol from his waistband and gave it to Individual A, who then slid the gun underneath the closed door towards the front of the gangway (west).

b. Officer A grabbed hold of LANGSTON's arms and ordered Individual A – whose face is clearly visible in the officer's body camera footage – to get on the ground.¹¹ Individual A did not heed the command. Instead, he ran east back towards the alley and was apprehended by other officers a short while later.

¹¹ I identified Individual A as the person in the body camera footage based on a comparison to Individual A's booking photo and the photo associated with the Illinois driver's license for Individual A.

c. LANGSTON and Individual A were thereafter placed under arrest. The officer who chased LANGSTON and Individual A into the gangway proceeded to the other side of the gangway door, under which Individual A had placed LANGSTON's black firearm. Once there, the officer found a black handgun – namely, a loaded Sig-Sauer black .40 caliber semi-automatic pistol, bearing serial number 58B119266.

57. Based on my training, experience, and familiarity with this investigation – including CS-2's prior and subsequent controlled narcotics purchases from RANDALL LANGSTON, intercepted communications showing LANGSTON regularly participating in the management of street-level drug distribution (discussed below), and the close proximity of 1300 Avers to the Avers Avenue drug spot (where CLANTON sold CS-2 heroin on July 12, 2018, as discussed below) – I believe that, on or about May 25, 2018, LANGSTON (a) was engaged in drug trafficking activities at the Avers Avenue drug spot; and (b) possessed the loaded Sig-Sauer handgun in part to protect himself during those drug-trafficking activities.

3. CLANTON, RANDALL LANGSTON, and UM-1 Sell Approximately 110 Grams of Fentanyl Analogue-Laced Heroin to CS-2 (July 12, 2018)

58. On or about July 6, 2018, at approximately 12:20 p.m., CS-2 sent a consensually recorded Facebook Messenger message to CLANTON at Clanton Facebook Account 1. In the message, CS-2 asked CLANTON to call him and provided a phone number used by CS-2.

59. According to CS-2, on or about July 7, 2018, at approximately 5:30 p.m., CLANTON, who was using a new phone number (“Clanton Phone 4”), placed a call to CS-2. This call was not recorded because CS-2 did not at that time know CLANTON was using Clanton Phone 4 and thus did not activate the recording device before answering the call. CS-2, however, notified agents about the call immediately after it happened and the call history on CS-2’s phone documents an approximately one minute and 51 second call with Clanton Phone 4 at that time. According to CS-2, during the call, CLANTON told CS-2 that CLANTON would be ready for CS-2 the following week, and CS-2 understood CLANTON to mean that he would be ready to sell CS-2 heroin the following week.

60. On or about July 11, 2018, at approximately 3:19 p.m. CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using Clanton Phone 2.¹² During this call, CS-2 said, “[H]ey, tell big bro [CLANTON]...I finnin to go out and grab that shit [heroin]. I’ll be back first thing in the morning. . . . Fifty-five all the way around the board, right [\$5,500 for 100 grams of heroin, or \$55 per gram]?” LANGSTON said, “[H]alf fifty-five and half six [some of CLANTON and LANGSTON’s heroin supply costs \$5,500 per 100 grams, another higher quality supply of heroin costs \$6,000 for that same quantity].” CS-2 asked,

¹² Here and in other instances discussed below, one of the CLANTON DTO members (RANDALL LANGSTON) used a phone that was also used by other members (CLANTON and Clanton Phone 2) to speak with CS-2. In my training and experience, individuals involved in a drug trafficking organization sometime share phones or phone numbers.

“[Y]ou got another flavor [type of heroin]?” LANGSTON replied, “Yea, something better [heroin that customers prefer].”

61. On or about July 12, 2018, between approximately 9:41 a.m. and 9:56 a.m., CS-2 exchanged a series of consensually captured texts with RANDALL LANGSTON, who was using Clanton Phone 2. During this exchange, CS-2 and LANGSTON agreed to meet in the same location as previous controlled purchases – the 500 block of Morris Avenue in Bellwood – so CS-2 could buy the 100 grams of heroin.

62. At approximately 10:56 a.m., surveillance observed CS-2 arrived in the area of 500 Morris Avenue in Bellwood where CS-2 had previously met with, and obtained heroin from, RANDALL LANGSTON. CS-2 remained in that location until approximately 11:30 a.m., returned to the staging location, and then returned to the 500 block of Morris Avenue at approximately 1:46 p.m.. LANGSTON never arrived, and CS-2 left the meet location at approximately 3:00 p.m.

63. At approximately 5:06 p.m., CS-2 had a consensually recorded phone conversation with RANDALL LANGSTON, who was using Clanton Phone 2. During this call, LANGSTON told CS-2 that he no longer wanted to meet in Bellwood. LANGSTON said, “[M]eet me at the [BP gas station] on Roosevelt and Independence [near a CLANTON DTO drug spot, discussed below].”

64. Shortly before 6:00 p.m., CS-2 had a consensually recorded phone conversation with CLANTON, who was using Clanton Phone 5. During this call, CLANTON told CS-2 to drive from the BP gas station on Roosevelt and Independence

and onto Independence Boulevard so CS-2 could meet with CLANTON. As described below, I know the area around Roosevelt Road and Independence Avenue to be a drug spot where CLANTON and other AHK members distribute heroin.

65. At approximately the same time as the aforementioned call, surveillance observed CS-2 depart the BP gas station on Roosevelt and Independence and turn south onto Independence Boulevard, where CS-2 met with CLANTON at approximately 6:03 p.m. Prior to this meeting, agents searched CS-2 and CS-2's vehicle for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-2 with a concealed audio and video recording equipment; gave CS-2 \$5,980 in law enforcement funds, and kept CS-2 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-2's recording device and according to CS-2:

a. CLANTON, whose face is visible in the recordings,¹³ got into the passenger seat of CS-2's car, and an unknown male ("UM-1") got in the back seat. CLANTON told CS-2 that UM-1 was going to "take care of you [sell the heroin that CS-2 had planned to buy from RANDALL LANGSTON earlier that day]."

b. CLANTON said, "I was trying to kill a n----- today. . . . He got the nerve to go asking n-----s about me. I got a block [drug spot] I'm working on, and he

¹³ Agents identified CLANTON as the individual in CS-2's car based on the following: CS-2 identified the individual with whom he met as CLANTON, and agents compared the individual captured in the video to CLANTON's Illinois driver's license photo and, based on that comparison, determined that CLANTON was the man who met with CS-2 that day. As described above, law enforcement also compared this individual's voice to the voice of the speaker on Clanton Phone 1, Clanton Phone 2, Clanton Phone 3, and Clanton Phone 5, and determined that the voices were the same.

going to go ask these n-----s ‘Hey, y’all got one on them Muslims [AHK members¹⁴] down there.’”

c. CLANTON stated, “You can give unc [UM-1] the money. I’m finna to come back with him though [CLANTON and UM-1 needed to leave CS-2’s car to get the heroin, then come back to complete the sale].”

d. According to CS-2, CS-2 handed the \$5,980 in government buy funds to CLANTON. The audio/video recordings then captured CLANTON reaching towards the back seat where UM-1 was sitting and state, “No, give it [the buy money] to unc [UM-1].” CLANTON then exited CS-2’s car with UM-1. As CLANTON was getting out of the car, CS-2 asked, “105 [grams of heroin], right?” CLANTON replied, “I’ll be right back.”

e. About 15 minutes later, CLANTON and UM-1 returned to CS-2’s car. Upon getting in the car, UM-1 asked, “You ready for them [the heroin].” CLANTON replied, “Yeah.” UM-1 handed CS-2 a clear plastic baggie containing a powdery brown substance and another clear plastic baggie containing a white granule-like substance, stating, “Here you go boss man.” CLANTON, referring to the baggies, said, “That’s 105 [grams of heroin] and 5 [grams of heroin] for you. And then I gave you 10 [grams] of something else [a substance containing a synthetic cannabinoid (FUB-AMB) and a synthetic opioid (U-47700), both of which are Schedule I controlled substances]. . . . That’s a hundred a ‘g’ [gram], and I gave it to

¹⁴ According to CS-1, prospective AHK members must convert to Islam prior to joining the gang.

you for free, ten of them . . . just for the inconvenience [RANDALL LANGSTON's failure to show up for the heroin sale earlier that day].”

f. Later during the meeting in CS-2 vehicle, CLANTON gave CS-2 his “recipe” for mixing the white soft substance (later determined to be FUB-AMB and U-47700) with the heroin. CLANTON explained, among other things, that CS-2 should add a “nick [nickel, meaning 5 grams]” of the cutting agent to the approximately 110 grams of heroin that CLANTON had just sold to CS-2.

g. According to CS-2 and the audio/video recordings, during the meeting in CS-2 car, CS-2 drove CLANTON and UM-1 around the area.

66. Based on my training, experience, and familiarity with this investigation – including information from CS-2 and prior and subsequent recorded and intercepted communications involving CLANTON – I believe that, during this meeting, CLANTON (a) told CS-2 that he was operating a drug spot near the intersection of Roosevelt and Independence; (b) earlier that day, he had considered causing bodily harm to an individual who had been asking questions about CLANTON and other AHK members (“Muslims”) operating that drug spot; (c) directed CS-2 to give the \$5,980 in buy money for 105 grams of heroin to UM-1; (d) retrieved, together with UM-1, approximately 110 grams of a fentanyl analogue-laced heroin and 10 grams of a substance containing both FUB-AMB and U-47700 from a location near Independence Boulevard and 13th Street; (e) directed UM-1 to hand that fentanyl analogue-laced heroin and substance containing both FUB-AMB and U-47700 to CS-2; (f) advised CS-2 that he (CLANTON) was giving CS-2 five extra

grams of heroin and 10 grams of the cutting agent free, to make up for RANDALL LANGSTON's failure to show up for the heroin sale that they had planned in Bellwood earlier that day; and (g) instructed CS-2 on how to use the FUB-AMB/U-47700 cutting agent to increase the quantity of the 110 grams of heroin that CLANTON sold CS-2 that day and thereby increase CS-2's profits upon reselling that heroin to others.

67. A short while later, according to the audio/video recordings and CS-2, CS-2 stopped the vehicle, at which point CLANTON and UM-1 got out of the vehicle. After CLANTON and UM-1 left the vehicle, CS-2 provided his/her location to law enforcement. Surveillance observed CS-2 at that location at approximately 6:35 p.m., and followed CS-2 to a prearranged location, where he/she met with agents. Agents recovered the audio/video recording devices from CS-2's person and vehicle, and searched both CS-2 and his/her vehicle for contraband and money with negative results. CS-2 also gave law enforcement two clear plastic baggies, one containing a powdery brown substance and another containing a white, granule-like substance, both of which CS-2 stated he/she had obtained from CLANTON and UM-1 in exchange for the \$5,980 in law enforcement funds. Agents submitted both substances to the DEA laboratory for testing. The lab determined that the powdery brown substance weighed approximately 110 grams and contained heroin and furanyl fentanyl, and the white, granule-like substance weighed approximately 10 grams and contained both FUB-AMB and U-47700. According to drug schedules maintained by DEA and based on my training and experience, FUB-AMD is a Schedule I synthetic

cannabinoid, and U-47700 is a Schedule I synthetic opioid sometimes referred to as “pink.”

C. Defendants’ Operation of a Drug Spot on North Hamlin in Chicago

68. CLANTON, RANDALL LANGSTON, BRANDON LANGSTON, WYATT, MUHAMMAD-CURTIS, THAXTON, and other members of the CLANTON DTO operated a second drug spot on the 900 Block of North Hamlin Avenue in Chicago. As discussed below, the evidence shows that:

a. Between September 2018 and December 2018, surveillance observed BRANDON LANGSTON and other members of the CLANTON DTO engage in numerous hand-to-hand transactions with people visiting the North Hamlin drug spot. Between September and October 2018, law enforcement intercepted numerous communications between CLANTON, RANDALL LANGSTON, WYATT, and others, in which these individuals discussed the supply of narcotics and staffing of workers at the North Hamlin drug spot.

b. On or about September 27, 2018, RANDALL LANGSTON, with the assistance of an unidentified woman, sold approximately 99.3 grams of a fentanyl analogue to CS-2 at a location near the North Hamlin drug spot.

c. Between October and December 2018, BRANDON LANGSTON, WYATT, and several other CLANTON DTO members sold over 50 user quantities of narcotics to a confidential source (CS-4) and an undercover agent, over the course of eight separate transactions at the North Hamlin drug spot.

d. Between no later than September 23, 2018, and October 16, 2018, MUHAMMAD-CURTIS and THAXTON provided armed security for the sale of narcotics at the North Hamlin drug spot, including approximately 98.9 grams of heroin seized from a drug spot stash house on October 16, 2018.

e. On or about December 7, 2018, CLANTON and WYATT were found at a North Hamlin drug spot stash house with approximately 23.3 grams of heroin and 20.3 grams of U-47700.

1. CLANTON, RANDALL LANGSTON, BRANDON LANGSTON, and WYATT Manage and Operate the North Hamlin Drug Spot

a. Surveillance Observes Numerous and Coordinated Hand-to-Hand Exchanges at the North Hamlin Drug Spot (September to December 2018)

69. Between September 2018 and December 2018, law enforcement conducted regular surveillance near the three-flat building at 924 North Hamlin in Chicago. Throughout this period, surveillance regularly observed patterns of behavior that, in my experience and based on my familiarity with this investigation, show that the area around 924 North Hamlin functioned as an open-air drug spot. Among other things:

a. On numerous occasions, surveillance observed various people, including BRANDON LANGSTON, standing or sitting in front of the building at or near 924 North Hamlin, while various other people walked up and down the sidewalks around that building before returning to the building where others remained in place. Based on my training, experience, and familiarity with this

investigation – including the movements of these individuals, subsequent controlled purchases from various individuals on that block, and subsequent seizures of narcotics and firearms from individuals and locations on that block – I believe that some of the people whom agents observed on those occasions were working on the North Hamlin drug spot as lookouts, security, street-level narcotics dealers, runners, money collectors, or marketers (commonly known as “hypes” or “touts,” who advertise the sale of narcotics to customers on the street).

b. On numerous occasions, surveillance observed individuals approach the area around 924 North Hamlin, both on foot and by car, speak briefly with individuals situated outside the building, and then conduct a quick hand-to-hand exchange with people near the building. Based on my training, experience, and familiarity with this investigation – including the movements of these individuals, subsequent controlled purchases from various individuals on that block, and subsequent seizures of narcotics and firearms from individuals and locations on that block – I believe that many of the individuals whom agents observed engage in hand-to-hand transactions were drug customers who paid money for narcotics during these exchanges.

c. On numerous occasions, surveillance observed a vehicle circle the block or blocks near 924 North Hamlin repeatedly. Based on my training, experience, and familiarity with this investigation – including the surveilled movements of the individuals on that block, subsequent controlled purchases from various individuals on that block, and subsequent seizures of narcotics and firearms from individuals and

locations on that block – I believe these vehicles were driven by members of the CLANTON DTO who were responsible for keeping a lookout for (a) rival drug dealers who might threaten the CLANTON DTO’s control of the drug spot and (b) law enforcement, which threatened to put an end to the DTO’s unlawful activities.

70. Specific instances of these activities, occurring at or near times in which CLANTON, RANDALL LANGSTON, BRANDON LANGSTON and WYATT discussed their management of the North Hamlin drug spot, are discussed below.

**b. CLANTON, RANDALL LANGSTON, and WYATT
Discuss the Supply of Narcotics and Staffing of
Workers at the North Hamlin Drug Spot**

71. On or about September 14, 2018, at approximately 12:58 p.m. (Target Phone 1, session #1736), RANDALL LANGSTON, who was using Target Phone 1,¹⁵ had a phone conversation with UM-9325. During this call, UM-9325 said that he gave “shorty two [units of crack cocaine]” and “that’s the whole C lick [crack cocaine].” LANGSTON said that “shorty” said “it was 4 [units of crack cocaine].” UM-9325 asked how it could be four, noting that “he [shorty]” would only put three [units] together.”

72. According to court-authorized location information, at or around the time of the above-referenced call, RANDALL LANGSTON’s phone at that time (Target Phone 1) connected to cellular towers approximately 0.1 miles from 924 North Hamlin Avenue and the North Hamlin drug spot.

¹⁵ On or about September 4, 2018, Chief Judge Rubén Castillo authorized the interception of wire and electronic communications occurring over one of RANDALL LANGSTON’s phones (Target Phone 1), as well as location information for Target Phone 1. The Court authorized the extension of this authority thereafter.

73. Based on my training, experience, and familiarity with this case – including prior and subsequently intercepted calls, prior controlled purchases of narcotics from RANDALL LANGSTON and CLANTON, surveillance of LANGSTON and CLANTON near the North Hamlin drug spot and GPS location information for Target Phone 1 – I believe that: (a) during the aforementioned call, UM-9325 advised RANDALL LANGSTON that he (UM-9325) had given one of their workers (“shorty”) two units of crack cocaine (“two” from “the whole C lick”) to sell to others from the North Hamlin drug spot that the CLANTON DTO operated; and (b) at the time of that call, LANGSTON was at the North Hamlin drug spot and had spoken to “shorty” about the quantity of crack cocaine that UM-9325 had given him (“shorty”) to distribute.

74. On or about September 16, 2018, at approximately 10:37 a.m. (Target Phone 1, session #3005), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with WYATT, who was using Wyatt Phone 1.¹⁶ During this call, LANGSTON told WYATT to “get the rest of the D-Pack [pack of heroin] too. He talking about, he only got, see what he got, eleven, twelve left [11 or 12 resale units of heroin].” WYATT replied, “Aight.”

¹⁶ Law enforcement identified WYATT as the user of Wyatt Phone 1 based on the following. In intercepted calls over Target Phone 1 in or around September 2018 and October 2018, RANDALL LANGSTON referred to the user of Wyatt Phone 1 as “Hezzy,” which I believe is short for “HEZKIAH,” WYATT’s first name. In addition, law enforcement reviewed a prior recorded conversation with WYATT by law enforcement in October 2019, compared his voice with the voices on intercepted calls over Wyatt Phone 1 and the voice of a speaker identified as “Hezekiah” on a recorded jail call with MUHAMMAD-CURTIS in October 2018, and determined the voice on both phones was WYATT’s.

75. Several minutes later, at approximately 10:44 a.m. (Target Phone 1, session #3009), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-9325. During this call, LANGSTON asked, “What you on, big bro? You still out front [of 924 N. Hamlin]?” UM-9325 said he “rolling around here watching these police.” LANGSTON asked, “What they on?” UM-9325 replied, “Shit, just riding doing they job.” LANGSTON said, “I’m buying me some C [cocaine], I’m gonna get down in like 10 minutes.... Tell shorty [a drug spot worker] to tell the Ps [drug spot customers] hold on if they coming.”

76. According to court-authorized location information, at or around the time of the above-referenced call, RANDALL LANGSTON’s phone (Target Phone 1) was located near 924 North Hamlin Avenue and the North Hamlin drug spot.

77. About 20 minutes later, at approximately 11:07 a.m. (Target Phone 1, session #3017), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-9325. During this call, UM-9325 said, “Stand down [do not distribute narcotics or engage in other criminal activity at the drug spot]. They [the police] ridin’.” LANGSTON asked, “They ridin’ right now?” UM-9325 replied, “Yeah, they in a couple of unmarks [unmarked law enforcement vehicles] and they got this camouflage uh, Tahoe...they got the ol’ plates on the front.”

78. According to court-authorized location information, at or around the time of the above-referenced call, RANDALL LANGSTON’s phone (Target Phone 1) was still located near 924 North Hamlin Avenue and the North Hamlin drug spot.

79. Based on my training, experience, and familiarity with this case – including prior and subsequently intercepted calls, prior controlled purchases of narcotics from CLANTON and RANDALL LANGSTON, prior and subsequent surveillance of the Avers Avenue and North Hamlin drugs spots, and GPS location information for Target Phone 1 – I believe that, during the aforementioned calls, (a) RANDALL LANGSTON was located at, and participating in the distribution of narcotics from, the North Hamlin drug spot; (b) RANDALL LANGSTON advised UM-9325 that he was obtaining a supply of cocaine to distribute to CLANTON DTO members at a drug spot (or spots) for resale to others; and (c) UM-9325 warned LANGSTON to refrain from conducting any narcotics trafficking or other criminal activity because UM-9325 had observed what he believed to be unmarked law enforcement vehicles in the area of one of the drug spots.

80. Several minutes later, at approximately 11:12 a.m. (Target Phone 1, session #3020), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with WYATT, who was using Wyatt Phone 1. During this call, LANGSTON and WYATT discussed a “shift change [when workers at a drug spot change shifts].” LANGSTON said he would “grab some work [narcotics] for us [LANGSTON, WYATT, and possibly other drug associates].”

81. On or about September 18, 2018, at approximately 10:50 a.m., (Target Phone 1, session #4674), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with WYATT, who was using Wyatt Phone 1. During this call, LANGSTON asked, “How many [packs of narcotics did WYATT have left for

sale]?” WYATT said, “I just started on [began selling narcotics from] this other pack.” Later in the conversation, LANGSTON told WYATT that LANGSTON had given him “three packs [of narcotics].”

82. According to court-authorized location information, at or around the time of the above-referenced call, RANDALL LANGSTON’s phone (Target Phone 1) was still located near 924 North Hamlin Avenue and the North Hamlin drug spot. Based on my training, experience, and familiarity with this investigation – including this phone location information, surveillance of RANDALL LANGSTON near the North Hamlin drug spot on or about September 17, 2018, and prior and subsequent intercepted calls – I believe that, at the time of the aforementioned call, RANDALL LANGSTON was located at, and participating in the distribution of narcotics from, the North Hamlin drug spot.

83. On or about September 19, 2018, at approximately 8:15 p.m. (Target Phone 1, session #5415), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-9325. During this call, LANGSTON stated, “We need more baggies [to package narcotics].” UM-9325 responded, “Soon.”

84. According to court-authorized location information, at or around the time of the above-referenced call, RANDALL LANGSTON’s phone (Target Phone 1) was still located near 924 North Hamlin Avenue and the North Hamlin drug spot.

85. On or about September 19, 2018, surveillance observed an individual exit the building at or near 924 North Hamlin and engage numerous hand-to-hand exchanges with multiple people in a short amount of time. Based on my training,

experience, and familiarity with this investigation – including prior and subsequent intercepted communications, subsequent controlled purchases from various individuals on that block, and subsequent seizures of narcotics and firearms from individuals and locations on that block – I believe that (a) the person exiting the building was distributing retail quantities of narcotics to various customers at the North Hamlin drug spot on behalf of CLANTON, RANDALL LANGSTON, and the CLANTON DTO; and (b) RANDALL LANGSTON was at that same time located at, and participating in the distribution of narcotics from, the North Hamlin drug spot.

86. On or about September 27, 2018, at approximately 9:21 p.m. (Target Phone 1, session #8426), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with WYATT, who was using Wyatt Phone 1. During this call:

a. WYATT said, “Fat shorty said there ten [unintelligible] in there . . . the pack [there were 10 individually packaged user quantities of heroin in a pack controlled by a DTO drug spot worker called “Fat Shorty”].”

b. LANGSTON said, “Tell him [Fat Shorty] I just had counted it [counted the number of units in the pack of heroin that LANGSTON had given Fat Shorty to sell to others] before I sent it out, bro. . . . Make sure, I gotta count every one of them [packs], motherfuckers be trying to run games, bro. . . . He [Fat Shorty] musta dropped something [dropped units of heroin from the pack]. . . . I ain’t trying to have none of that shit. . . . Turn that shit [money Fat Shortly owes LANGSTON for unaccounted units of heroin] over. I just . . . counted them right before I sent them

out. I just put the jabs [individually packaged user quantities of heroin] together. . . . Counted this shit [the units of heroin in Fat Shorty's pack] like three times."

c. WYATT said, "I know he [Fat Shorty] ain't gonna short you no three bags [of heroin]." LANGSTON said, "Just hit me, tell him [Fat Shorty] I need my bread [money Fat Shorty owes LANGSTON for the heroin]. How many [units of heroin] he got left?" WYATT replied, "He only got two." LANGSTON said, "Tomorrow, let him work [unintelligible] [on the drug spot] . . . I can't do shit, I need my bread [money Fat Shorty owes LANGSTON]."

87. On or about October 9, 2018, at approximately 10:05 a.m. (Target Phone 1, session #15052), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with CLANTON, who was using Brandon Langston Phone 2.¹⁷ During this call, CLANTON said, "I'm finna come out there [to the drug spot where RANDALL LANGSTON was working] now. . . . You still got work, [narcotics] right?" RANDALL LANGSTON replied, "I only got one fifty [150 units of narcotics]. . . . Hezzy [WYATT] got his work [narcotics] whatever you [CLANTON] gave him. CLANTON said, "I gave him [WYATT] three, . . . I mean four D [four units of heroin], two C [two units of cocaine or crack cocaine]. . . . He still got all that?" RANDALL LANGSTON

¹⁷ As noted above, in my training and experience, individuals involved in a drug trafficking organization sometime share phones or phone numbers. Here, CLANTON used a phone (Brandon Langston Phone 2) that was also used by BRANDON LANGSTON. As noted above in paragraph 21, on or about March 15, 2018, BRANDON LANGSTON provided Brandon Langston Phone 2 to CS-2 after CS-2 asked CLANTON for a number to contact to order heroin.

replied, “Hell yea, he got one off [one unit sold].... [a]nd he working on one [selling another unit of heroin or cocaine].”

88. On or about October 15, 2018, at approximately 1:08 p.m. (Target Phone 1, session #16835), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-8186. During this call, LANGSTON said he was on the “joint on Hamlin [North Hamlin drug spot]” and “I’m trying to stay out the way because things been hot [LANGSTON believed law enforcement was in the area].” UM-8186 asked, “Who? They [law enforcement] been following you?” LANGSTON responded, “Hell yea, the alphabet boys [federal law enforcement agencies such as FBI or DEA].” UM-8186 said, “Stay low bro, stay low.”

89. On or about October 25, 2018, at approximately 11:20 a.m. (Target Phone 1, session #22421), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-1616. During this call, UM 1616 asked, “You said you just saw Hezzy [a nickname for Hezkiah, meaning WYATT]?” LANGSTON replied, “Hell yeah that n****r sit up there [at the drug spot] all night and not work one pack [did sell any heroin].”

90. Based on my training, experience, and familiarity with this case – including prior and subsequently intercepted calls, prior controlled purchases of narcotics from RANDALL LANGSTON and CLANTON, GPS location data for Target Phone 1, and surveillance of CLANTON, LANGSTON (and others) in the area of the North Hamlin drug spot on or about September 26, 2018 and/or September 27, 2018 – I believe that, during the above calls, CLANTON, RANDALL LANGSTON,

WYATT, and others (a) managed and supervised the sale of narcotics from the North Hamlin drug spot, both in person and over the phone; (b) discussed supplying narcotics, including heroin and cocaine, to members of the CLANTON DTO working at the North Hamlin drug spot (including WYATT) to sell to others; (c) discussed providing drug spot workers packaging material (“baggies”) in order to divide larger quantities of narcotics into smaller quantities for resale to drug spot customers; (d) discussed WYATT’s (“Hezzy”) failure to sell heroin on a particular night; and (e) discussed their efforts to detect and evade law enforcement because they knew their operation of the North Hamlin drug spot was illegal and they did not want to be caught.

91. On or about October 25, 2018, during an approximately four-hour span, surveillance observed the following:

a. At least six cars stopped near 924 North Hamlin and one person approached the address on foot. Each time a car stopped, either an individual standing near 924 Hamlin approached the vehicle or an occupant of the vehicle approached 924 Hamlin, before speaking briefly with each other. The person on foot also spoke briefly with someone near 924 North Hamlin.

b. Throughout this period, a blue minivan repeatedly drove around the area, intermittently returning to 924 North Hamlin.

92. Based on my training, experience, and familiarity with this investigation – including prior and subsequent intercepted communications, subsequent controlled purchases from various individuals on that block, and

subsequent seizures of narcotics and firearms from individuals and locations on that block – I believe the individuals standing near 924 Hamlin were distributing retail quantities of narcotics to the people who arrived in the six cars and on foot, and did so on behalf of CLANTON, RANDALL LANGSTON, and the CLANTON DTO.

c. CLANTON, RANDALL LANGSTON and WYATT Discuss Using a “Dope Fiend” to Test the Quality of Narcotics Prior to Distribution (September 16, 2018)

93. On or about September 16, 2018, at approximately 8:05 p.m. (Target Phone 1, session #3516), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-9325. During this call, LANGSTON said, “Send a motherfucker [drug user] over there [to the North Hamlin drug spot] to check the lick out [test the quality of heroin before distribution].” In the background of the call, CLANTON said, “Come holler at us real quick [to UM-9325 or another individual].” In the background, CLANTON, apparently addressing UM-9325, said, “Bring a DP [drug tester] with you.” LANGSTON then said, “Bring the dope fiend [drug tester] with you, to the front.” UM-9325 asked, “For real?” CLANTON said, “For real,” and LANGSTON said, “We need somebody to check the business [test the heroin] before we put it out there [distribute the narcotics to customers].”

94. Less than an hour later, at approximately 8:44 p.m. (Target Phone 1, session #3570), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with an unidentified man (“UM-1506”). During this call, LANGSTON said, “I’m in the trap house [house where narcotics are stored]...I’m on the block

[working at the North Hamlin drug spot].” UM-1506 asked, “Where Ali [CLANTON]?” LANGSTON said, “Right here with me [working on the drug spot].”

95. As noted above, according to court-authorized location information, at or around the time of both of the above-referenced calls, RANDALL LANGSTON’s phone (Target Phone 1) was located near 924 North Hamlin Avenue and the North Hamlin drug spot. Based on my training, experience, and familiarity with this investigation – including this phone location information and prior and subsequent intercepted calls – I believe that, at the time of the aforementioned call, RANDALL LANGSTON and CLANTON were located at, and participating in the distribution of narcotics from, the North Hamlin drug spot.

96. Two days later, on or about September 18, 2018, at approximately 7:21 p.m. (Target Phone 1, session #5006), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with WYATT, who was using Wyatt Phone 1. During this call, LANGSTON asked, “Where that white boy at [individual who tested heroin for RANDALL LANGSTON]?” WYATT said, “Right here.” LANGSTON asked, “What he take to the D [what was white boy’s opinion of the heroin]? . . . Is it [the heroin] better than yesterday [the heroin LANGSTON was distributing or testing the previous day]?” WYATT said, “He [white boy] said it’s a little milder but it’s [the heroin’s] just right.” LANGSTON then asked WYATT to put “white boy” on the phone. After WYATT handed the phone to an unidentified man, LANGSTON asked, “What’s up whiteboy? Man, you supposed to have the case of Hennessey [cognac]. . . . You just

played me man, after I looked out for you [“white boy” failed to give LANGSTON a case of cognac in exchange for the heroin sample].”

97. Based on my training, experience, and familiarity with this case – including prior and subsequently intercepted calls, prior controlled purchases of narcotics from RANDALL LANGSTON, and surveillance of LANGSTON in the area of the North Hamlin drug spot during the week of this call – I believe that, during the above calls, LANGSTON (a) arranged for UM-9325 to find someone to test the quality of heroin that CLANTON DTO members planned to sell at one of the DTO’s drug spots; (b) later agreed to allow an individual referred to as “white boy” to test the potency of that heroin for free in exchange for a case of Hennessey cognac; and (c) two days later, learned from WYATT that “white boy” had tested the heroin as directed and found that the narcotic’s potency was a “little milder” than the prior day’s supply but “just right” nonetheless.

2. RANDALL LANGSTON Sells Approximately 99.3 Grams of a Fentanyl Analogue to CS-2 Near the North Hamlin Drug Spot (September 27, 2018)

98. On or about September 27, 2018, at approximately 9:59 a.m., CS-2 sent a consensually-recorded text message to RANDALL LANGSTON, who was using Target Phone 1. CS-2 stated, “He gone do 55 all the way around [confirming that CLANTON and LANGSTON still agreed to sell CS-2 heroin for \$55 per gram as in their past heroin deals].”

99. On or about September 27, 2018, at approximately 10:23 a.m. (Target Phone 1, session #8111), RANDALL LANGSTON, who was using Target Phone 1,

had a phone conversation with CS-2. During this call, CS-2 said, “I’m finna call him [CS-2’s fictitious drug customer in Maywood]. I’m finning to go get the rest of the little bread [money to purchase the 105 grams of heroin].” LANGSTON replied, “I might need you to meet me [conduct the heroin transaction] out west of the e-way [expressway] though. . . . right off Independence [Boulevard in Chicago].”

100. On or about September 27, 2018, at approximately 12:58 p.m. (Target Phone 1, session #8200), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with CS-2. During the call, CS-2 explained that he had been ready to purchase narcotics for approximately three days but had difficulty getting a phone number at which to reach LANGSTON. LANGSTON said, “He [LANGSTON’s heroin supplier can’t do the 55 all the way around [will not take \$5,500 for 105 grams of heroin] . . . he gotta do the 60 [charge \$6,000 for 105 grams of heroin].” LANGSTON then instructed CS-2 to get off on Independence Avenue and “come towards the Ave [Hamlin Avenue].”

101. A short while later, at approximately 1:06 p.m. (Target Phone 1, session #8216), RANDALL LANGSTON, who was using Target Phone 1, had another phone conversation with CS-2. During this call, LANGSTON said, “[J]ust make sure your paperwork [money to purchase the heroin] is right. I’m finnin to send my people [LANGSTON will have someone else deliver the heroin to CS-2].” LANGSTON then directed CS-2 to drive to a Subway restaurant on the 3000 block of West Grand in Chicago, which is approximately a half mile from the North Hamlin drug spot.

102. At approximately 1:46 p.m., surveillance observed an unknown woman (“UF-1”) enter CS-2’s car in the parking lot of a Subway restaurant located on the 3000 block of West Grand. Prior to this meeting, agents searched CS-2 and CS-2’s vehicle for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-2 with a concealed audio recording equipment; gave CS-2 \$5,750 in law enforcement funds, and kept CS-2 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-2’s recording device and according to CS-2:

a. CS-2 asked, “Fifty seven fifty [\$5,750]?” UF-1 replied, “Aight.” CS-2 gave UF-1 approximately \$5,750 in cash, and UF-1 gave CS-2 two plastic baggies containing a gray chunky substance.

b. According to CS-2, CS-2 saw RANDALL LANGSTON inside the Subway restaurant during this transaction.

103. At approximately 1:47 p.m., surveillance observed UF-1 exit CS-2’s car and CS-2 depart the area. Shortly after CS-2 left the Subway parking lot, surveillance observed RANDALL LANGSTON at that Subway meeting with UF-1, who had just given the narcotics to CS-2. Surveillance observed LANGSTON and UF-1 walk together from the Subway to the drug spot on 900 block of North Hamlin, with LANGSTON continuing on to the area around 924 North Hamlin.

104. Following the meeting with UF-1, CS-2 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording devices from CS-2’s person and vehicle, and searched both CS-2 and his/her

vehicle for contraband and money with negative results. CS-2 also gave law enforcement two plastic baggies containing a gray chunky substance, both of which CS-2 stated he/she had obtained from UF-1 in exchange for the \$5,750 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 99.3 grams and contained furanyl fentanyl, U-47700, and FUB-AMB (the latter two substances being the same Schedule I cutting agent that CLANTON had previously given to CS-2 on July 12).

3. WYATT, BRANDON LANGSTON, and Other CLANTON DTO Members Sell Quantities of Fentanyl Analogue-Laced Heroin and Other Narcotics to a Confidential Source at the North Hamlin Drug Spot (October to December 2018)

105. As discussed below, between approximately October 2018 and December 2018, BRANDON LANGSTON, WYATT, and other members of the CLANTON DTO sold a fentanyl analogue, heroin laced with a fentanyl analogue, and cocaine to an individual who, unbeknownst to them, was a confidential source working with law enforcement (“CS-4”).¹⁸ Over the course of eight separate controlled transactions (one of which involved an undercover agent who accompanied CS-4), CS-4 and the

¹⁸ CS-4 has been cooperating with law enforcement for various periods since 2013. CS-4 is cooperating in exchange for monetary compensation, and to date has been paid approximately \$19,500. According to a law enforcement database, CS-4 has a prior conviction for disorderly conduct. The information provided by CS-4 in this investigation has been significantly corroborated by consensually recorded communications, physical surveillance, controlled purchases of narcotics, seizures of narcotics and narcotics paraphernalia, and other evidence in this investigation. I therefore believe the information provided by CS-4 to be reliable

undercover agent purchased over 50 user quantities of heroin from DTO members at the North Hamlin drug spot.

a. A CLANTON DTO Member Sells 0.78 Grams of Fentanyl Analogue to CS-4 (October 6, 2018)

106. On or about October 6, 2018, surveillance observed CS-4 approach a group of people on the sidewalk at or near 924 North Hamlin. Prior to this meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$20 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-4's recording device and according to CS-4:

a. CS-4 told the people on the sidewalk outside 924 North Hamlin that s/he was looking for "D [heroin]." An unidentified woman ("UF-2") then directed an unidentified man ("UM-2") to come inside the fence separating the sidewalk from the front yard at or near 924 North Hamlin. UM-2 asked, "How much [heroin] you need?"

b. UM-2 pulled two plastic bags from his pants and gave them to CS-4, who in turn paid UM-2 \$20 in cash.

107. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4's person, and searched CS-4 for contraband and additional money with negative results. CS-4 gave law enforcement two plastic bags, which CS-4 stated he/she had obtained from UM-2 in exchange for the \$20 in law

enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 0.78 grams and contained acryl fentanyl, furanyl fentanyl, FUB-AMB, and U-47700.

b. A CLANTON DTO Member Sells 0.65 Grams of Fentanyl Analogue-Laced Heroin to CS-4 (October 8, 2018)

108. On or about October 8, 2018, according to surveillance and CS-4, CS-4 approached an unidentified man (“UM-3”) sitting in a chair outside 924 North Hamlin. Prior to this meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$20 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-4’s recording device and according to CS-4:

a. CS-4 asked, “You working [selling narcotics]?”

b. Another unidentified man (“UM-4”) then gave CS-4 two small plastic baggies, and CS-4 handed \$20 to yet another unidentified man (“UM-5”).

109. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4’s person, and searched CS-4 for contraband and additional money with negative results. CS-4 gave law enforcement two small plastic baggies, which CS-4 stated he/she had obtained from UM-4 in exchange for the \$20 in law enforcement funds. Agents submitted the substance to the DEA laboratory for

testing, which determined that the substance weighed approximately 0.65 grams and contained heroin, acryl fentanyl (a fentanyl analogue), and U-47700.

c. WYATT and a CLANTON DTO Member Sell 0.78 Grams of a Synthetic Opioid (U-47700) and 0.1 Grams of Cocaine to CS-4 (October 11, 2018)

110. On or about October 11, 2018, surveillance observed CS-4 approach an unidentified woman (“UF-3”) at or near 924 North Hamlin. Prior to this meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$30 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-4’s recording device and according to CS-4:

a. CS-4 said that s/he wanted “two D [two \$10 bags of heroin] and one C [one \$10 bag of cocaine].” CS-4 gave UF-3 \$20, and UF-3 handed CS-4 two baggies containing two smaller gray plastic bags containing an off-white, rock-like substance.

b. UF-3 then pointed to a man, whom CS-4 later identified as WYATT based on a comparison to WYATT’s police booking photo, standing in a gangway to the south of 924 North Hamlin. UF-3 stated that WYATT had the “C [cocaine].”

c. CS-4 then followed WYATT into the gangway, where WYATT asked CS-4, “You got a hundred . . . of C [\$100 to purchase cocaine]?” CS-4 responded, “No. . . . I wanna see how much that get me [how many baggies of cocaine CS-4 could

get for \$100].” WYATT said, “Eleven [units of cocaine].” CS-4 then gave WYATT \$10, and WYATT gave CS-4 a small baggie containing an off-white powdery substance.

111. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4’s person, and searched CS-4 for contraband and additional money with negative results. CS-4 gave law enforcement two small plastic baggies containing an off-white powdery substance and one baggie containing one clear plastic bag, which contained two smaller bags containing an off-white white, rock-like substance. CS-4 stated he/she had obtained the two baggies with the powdery substance from UF-3 in exchange for \$20 in law enforcement funds, and the one baggie with a rock-like substance from WYATT in exchange for \$10 in law enforcement funds. Agents submitted the substances to the DEA laboratory for testing, which determined that (a) the powdery substance in the two baggies from UF-3 weighed approximately 0.78 grams and contained U-47700 (a synthetic opioid) and (b) the rock-like substance in the baggie from WYATT weighed approximately 0.1 gram and contained cocaine.

d. BRANDON LANGSTON Sells 1.7 Grams of Furanyl Fentanyl and U-47700 to CS-4 (October 24, 2018)

112. On or about October 24, 2018, surveillance observed BRANDON LANGSTON, whom law enforcement identified based on a comparison to LANGSTON’s Illinois driver’s license photo, at or near 924 North Hamlin, shining a laser pointer at CS-4 in an apparent attempt to get CS-4’s attention. Surveillance observed CS-4 walked towards and begin speaking with LANGSTON. Prior to this

meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$30 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-4's recording device and according to CS-4:

a. BRANDON LANGSTON stated, "Walk this way," then led CS-4 towards 924 North Hamlin. BRANDON LANGSTON said, "I'm finna to run, go upstairs [to the third floor apartment at 924 North Hamlin that the CLANTON DTO uses as a stash house] and grab that [narcotics for CS-4]."

b. BRANDON LANGSTON returned a short while later and, in exchange for \$30 from CS-4, gave CS-4 six plastic baggies containing an off-white powdery substance. CS-4 asked for BRANDON LANGSTON's phone number, and BRANDON LANGSTON gave CS-4 the phone number to Brandon Langston Phone 2.

113. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4's person, and searched CS-4 for contraband and additional with negative results. CS-4 gave law enforcement six plastic baggies containing an off-white powdery substance, which CS-4 stated he/she had obtained from BRANDON LANGSTON in exchange for \$30 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that

the substance weighed approximately 1.7 grams and contained furanyl fentanyl and U-47700.

e. A CLANTON DTO Member Sells 2.95 Grams of Fentanyl Analog to CS-4 and UC-1 (October 30, 2018)

114. On or about October 30, 2018, surveillance observed CS-4 and an undercover agent (“UC-1”) approach 924 North Hamlin on the sidewalk and speak with an unidentified man (“UM-6”) on the other side of the fence of the residence. Prior to this meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$50 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-4’s recording device and according to CS-4:

a. UM-6 asked CS-4 and UM-1 if they wanted “blows [heroin].”

b. CS-4 paid UM-6 \$30 in cash exchange for six small baggies. UC-1 paid UM-6 \$20 in exchange for four bags.

115. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4’s person, and searched CS-4 for contraband and large amounts of money with negative results. CS-4 gave law enforcement 6 plastic baggies, which CS-4 stated he/she had obtained from UM-6 in exchange for \$30 in law enforcement funds. Agents submitted the substance retrieved from CS-4 to the DEA laboratory for testing, which determined that the substance weighed approximately 1.69 grams and grams and contained two fentanyl analogues (acryl

fentanyl and furanyl fentanyl) and U-47700. The laboratory also determined that the substance in the four baggies purchased by UC-1 weighed approximately 1.26 grams and contained furanyl fentanyl and U-47700.

f. A CLANTON DTO Member Sells Approximately 6.47 Grams of Fentanyl Analogue-Laced Heroin to CS-4 (December 6, 2018)

116. On or about December 6, 2018, according to CS-4, an unidentified man (“UM-7”) approached CS-4 on the 900 block of North Hamlin. Prior to this meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$100 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting. During this meeting, as captured by CS-4’s recording device and according to CS-4:

a. CS-4 said, “I know Black [BRANDON LANGSTON’s nickname]. I tried calling his ass [at Brandon Langston Phone 2 to purchase narcotics].” UM-7 said, “Black locked up.”

b. CS-4 told UM-7 that CS-4 wanted “a whole pack [\$100 worth of heroin].” CS-4 paid UM-7 \$100 in cash, and UM-7 gave CS-4 approximately 22 baggies containing a substance. UM-7 joked that the \$100 from CS-4 would be used to post Black’s [LANGSTON’s] bail.

117. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4’s person, and searched CS-4 for contraband and large

amounts of money with negative results. CS-4 gave law enforcement 22 plastic baggies, which CS-4 stated he/she had obtained from UM-7 in exchange for \$100 in law enforcement funds. Agents submitted the substance retrieved from CS-4 to the DEA laboratory for testing, which determined that the substance weighed approximately 6.47 grams and contained heroin, furanyl fentanyl, and U-47700.

g. CLANTON DTO Members Sell Approximately 14.2 Grams of Fentanyl Analogue-Laced Heroin to CS-4 (December 20, 2018)

118. On or about December 20, 2018, according to CS-4, CS-4 approached two unidentified men at 924 North Hamlin. Prior to this meeting, agents searched CS-4 for the presence of contraband, firearms, and large amounts of cash with negative results; outfitted CS-4 with concealed audio recording equipment; gave CS-4 \$200 in law enforcement funds, and kept CS-4 under surveillance as he/she traveled to the location of the meeting, but lost sight of CS-2 when CS-4 ducked into the gangway where, according to CS-4, the meeting took place. During this meeting, as captured by CS-4's recording device and according to CS-4:

a. CS-4 asked the two men if they were "workin [selling narcotics]."

One of the men gestured towards a woman, whom CS-4 knew as "Red," who was near the door to 924 North Hamlin.

b. Red asked, "What you got, two hundred [\$200 to spend on narcotics]?" Red then went upstairs inside 924 North Hamlin. She came back down a short while later and told CS-4 she did not have enough heroin to sell CS-4, but that she had called another person who was on his way with more heroin.

c. A short while later, a man who referred to himself as “Lil T” arrived at 924 North Hamlin. Lil T asked CS-4, “Two packs [\$200 worth of heroin]?” CS-4 replied, “Yeah, two packs.” Lil T then gave CS-4 two bags in exchange for \$200 in cash.

119. Following this meeting, CS-4 traveled under surveillance to a prearranged location, where he/she met with agents. Agents recovered the audio recording device from CS-4’s person, and searched CS-4 for contraband and additional money with negative results. CS-4 gave law enforcement two bags, which CS-4 stated he/she had obtained from “Lil T” in exchange for \$200 in law enforcement funds. Agents submitted the substance to the DEA laboratory for testing, which determined that the substance weighed approximately 14.2 grams and contained heroin, furanyl fentanyl, and U-47700.

4. RANDALL and BRANDON LANGSTON Discuss the Management of the North Hamlin Drug Spot and Armed Security Provided by MUHAMMAD-CURTIS and THAXTON

120. As discussed above, on six separate days between September 27, 2018, and December 20, 2018, confidential sources (CS-2 and CS-4) purchased multiple quantities of fentanyl analogue, fentanyl analogue laced-heroin, and cocaine from multiple individuals at or near the North Hamlin drug spot. During this same period, as discussed below, RANDALL LANGSTON, BRANDON LANGSTON, and others discussed (a) RANDALL and BRANDON LANGSTON’s management, supervision, and supply of the North Hamlin drug spot; (b) MUHAMMAD-CURTIS’s and THAXTON’s roles in selling DTO narcotics and providing armed security for other

DTO members at that drug spot; and (c) the seizure of two loaded firearms, approximately 98.9 grams of heroin, and approximately 15.5 grams of cocaine from MUHAMMAD-CURTIS and THAXTON at the North Hamlin drug spot.

a. RANDALL LANGSTON Directs THAXTON to Provide Armed Security for the Sale of Cocaine at North Hamlin Drug Spot (September 23, 2018)

121. On or about September 23, 2018, at approximately 5:34 p.m. (Target Phone 1, session #6781), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with WYATT, who was using Wyatt Phone 1. During this call:

a. LANGSTON asked, “Who on rotation [selling narcotics at the North Hamlin drug spot].” WYATT replied, “Me and, uh, shorty.” LANGSTON asked, “Who out next [Who’s working the next shift on the drug spot]?” WYATT said, “[P]robably Fat Shorty.” LANGSTON asked, “When the last time he [Fat Shorty] worked one [a drug spot shift].” WYATT replied, “Yesterday.” LANGSTON asked, “He [Fat Shorty] didn’t get here [to work the drug spot] before Frank [THAXTON arrived at the drug spot to work]?” WYATT said, “Hell no.”

b. LANGSTON said, “Tell Frank [THAXTON] . . . he gotta do security [work a shift protecting the drug spot], walking back and forth.” Later during the conversation, LANGSTON said, “Give Quentin [LNU] them C packs [package of individual units of cocaine for resale].”

122. Based on my training, experience, and familiarity with this investigation – including law enforcement’s observation of THAXTON several weeks

later at the North Hamlin drug spot in possession of a handgun that was recovered by police, a subsequent intercepted call in which LANGSTON stated that the seized gun belonged to him, prior controlled purchases of narcotics from LANGSTON, and prior and subsequent surveillance and intercepted communications – I believe that, in this call, RANDALL LANGSTON directed WYATT to tell THAXTON to provide armed security for other DTO workers charged with storing and selling narcotics, including cocaine or crack cocaine (“C packs”), at the North Hamlin drug spot.

b. MUHAMMAD-CURTIS Provides Armed Security for the Sale of Heroin and Cocaine at North Hamlin Drug Spot (October 9 and 11, 2018)

123. On or about October 9, 2018, at approximately 1:09 p.m. (Target Phone 1, session #15089), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with BRANDON LANGSTON, who was using Brandon Langston Phone 2. During this call:

a. RANDALL LANGSTON asked, “Where the pipes [guns] at?” BRANDON LANGSTON responded, “Naheem [MUHAMMAD-CURTIS¹⁹] got it [the gun(s)].” RANDALL LANGSTON said, “I’m talking about the forty [.40 caliber], I mean the nickel.” BRANDON LANGSTON replied, “[O]utside in the back,... in the bushes, you know the bushes, toward my room, my back door, right there on the brick.”

¹⁹ Law enforcement identified “Naheem” as MUHAMMAD-CURTIS’s nickname based on jail calls to and from MUHAMMAD-CURTIS in which he refers to himself, and others refer to him, as Naheem.

b. LANGSTON said, “Bag up some more work [package heroin for distribution]” because “we only got those two packs [of heroin] left that he had gave old girl [the LANGSTON brothers’ female accomplice].” BRANDON LANGSTON asked, “[T]he D [heroin]?” LANGSTON replied, “Yeah, we gave them two pa- [packs], we ran through a [unintelligible] [quantity of heroin units] almost.”

c. LANGSTON asked, “You been letting it rain on my pipe [the gun that BRANDON said was left outside in the bushes]?” BRANDON LANGSTON said, “I usually be in the back [of the house near the drug spot], that’s why I keep it [the gun] back there.” BRANDON LANGSTON further stated, “Ahk, that’s a Glock [pistol]... that’s made of polymer.”

124. On or about October 10, 2018, at approximately 11:30 a.m. (Target Phone 1 session #15325), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with BRANDON LANGSTON, who was using Brandon Langston Phone 2. During the call, BRANDON LANGSTON asked, “You said what?” RANDALL LANGSTON replied, “Damn bro [unintelligible] talk on the fucking phone like that, Ahk. Police already on your ass, tweaking. Ten tens [ten units of narcotics].” BRANDON LANGSTON said, “Alright.”

125. Based on my training, experience, and familiarity with this case – including law enforcement’s observation of MUHAMMAD-CURTIS less than one week later at the North Hamlin drug spot in possession of a handgun that was recovered by police, a subsequent intercepted call in which LANGSTON stated that the seized gun belonged to him, prior and subsequent controlled purchases of

narcotics from RANDALL and BRANDON LANGSTON, CS-4's prior controlled purchases of narcotics from multiple individuals at the North Hamlin drug spot at the time of these calls, and prior and subsequent surveillance and intercepted communications – I believe that, during the aforementioned calls, RANDALL LANGSTON and BRANDON LANGSTON discussed; (a) the need to package larger quantities of narcotics into smaller quantities for resale to others because the narcotics previously packaged for resale at the drug spot were running low; (b) BRANDON LANGSTON's storage of RANDALL LANGSTON's Glock pistol in a bush behind a house at a drug spot where BRANDON LANGSTON typically sells DTO drugs; and (d) MUHAMMAD-CURTIS providing armed security for other DTO workers charged with storing and selling DTO at the North Hamlin drug spot at the time of these calls.

126. On or about October 11, 2018 – the same day that CS-4 bought a quantity of cocaine and U-47700 from WYATT at the North Hamlin drug spot – at approximately 2:41 p.m. (Target Phone 1, session #15711), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with an unidentified man (“UM-1616”). During this call, UM-1616 asked, “[H]e [MUHAMMAD-CURTIS] uh. . . rotate for you [begin a shift on the drug spot]? . . . [Y]eah, Naheem [MUHAMMAD-CURTIS]?” RANDALL LANGSTON responded, “Yea, he rotated through me [started a shift on the drug spot]. . . . Yea, I’m cool. I’m out here [working the drug spot] with him [MUHAMMAD-CURTIS]. I just had to call some more motherfuckers. Wasn’t nobody out here [working the drug spot] but him [MUHAMMAD-CURTIS].”

127. Based on my experience and familiarity with this investigation – including law enforcement’s observation of MUHAMMAD-CURTIS only five days later at the North Hamlin drug spot in possession of a handgun that was recovered by police, a subsequent intercepted call in which LANGSTON stated that the seized gun belonged to him, prior and subsequent controlled purchases of narcotics from RANDALL LANGSTON, CS-4’s prior controlled purchases of narcotics from multiple individuals at the North Hamlin drug spot at the time of these calls, and prior and subsequent surveillance and intercepted communications – I believe that in this call, LANGSTON told UM-1616 that he and MUHAMMAD-CURTIS were the only two workers selling narcotics at the North Hamlin drug spot at the time of this call.

c. MUHAMMAD-CURTIS and THAXTON Arrested While Providing Armed Security for Approximately 98.9 Grams of Heroin and Other Narcotics Stored at a North Hamlin Drug Spot Stash House (October 16, 2018)

128. According to Chicago police reports, on or about October 16, 2018, CPD officers responded to a dispatch call reporting that two men in black jackets had been observed standing in front of 920 North Hamlin (the house immediately to the south of 924 North Hamlin) with guns. According to police reports, officers’ body-worn camera footage from this incident, and Chicago police personnel:

a. As responding CPD officers pulled up in front of 920 North Hamlin, the observed two men – later identified as MUHAMMAD-CURTIS and THAXTON – on the sidewalk in front of the address wearing black outer clothing. Upon seeing the officer’s car, one of the men said something to the other, and they

both walked inside the fenced-off area in front of 920 North Hamlin toward the premises' stoop.

b. As one of the officers got our the car to approach the men, CURTIS-MUHAMMAD and THAXTON began running towards the rear of the residence. One of the officers pursued the men and, during the chase, observed CURTIS-MUHAMAD, who was wearing a black sweater, pull what looked like a black Glock pistol from his waistband.

c. THAXTON and CURTIS-MUHAMAD then climbed a balcony, scaled a fence, and landed in the rear yard of 924 North Hamlin. When THAXTON got up in the yard, the officer observed THAXTON holding a smaller black handgun in his right hand.

d. Officers then observed CURTIS-MUHAMMAD enter a side door of 924 North Hamlin and heard footsteps go upstairs followed by a door-slamming in what appeared to be the third-floor unit. An officer walked up to the third-floor apartment door and heard people inside the apartment stating something to the effect that they had run from police with guns in their hands. An officer announced his presence at the door but no one answered, and that officer could hear quick movements inside the apartment.

e. A short while later, officers obtained a key to the third-floor apartment from one of the unit's residents currently in the first-floor unit. Upon entering the third-floor unit with the key, officers saw CURITS-MUHAMAD, no longer wearing the black sweater, and THAXTON sitting on a couch in the living

room with CLANTON, RANDALL LANGSTON, and another individual. A short time later, police obtained consent to search the unit from a leaseholder of that apartment. WYATT was also present in or around 924 North Hamlin when officers entered.

f. During the search, officers looked outside the living room window and saw four bags on the roof of the neighboring building. After recovering the bags, officers found that one of the bags contained a loaded black Glock 23 pistol, and a loaded black XD-9 pistol, both of which were similar to the guns that officers had observed CURTIS-MUHAMAD and THAXTON carrying earlier. The bag also contained a black sweater similar to the one officers saw CURTIS-MUHAMAD wearing as he ran from police carrying the black handgun.

g. Officers found that the other three bags contained, among other things, approximately 31 rounds of ammunition, materials used to package narcotics, and substances that appeared to be, based on the officer's training and experience, a quantity of cocaine and an even larger quantity of heroin.

h. Police took MUHAMMAD-CURTIS and THAXTON into custody and provided *Miranda* warnings to each. Both men agreed to speak with police without the assistance of counsel. During their unrecorded interviews:

i. MUHAMMAD-CURTIS stated that officers might have seen him with a gun, but he did not have a gun on him when he was arrested.

ii. THAXTON stated that he ran from police because he was scared. When an officer told

THAXTON that the officer saw him holding a gun, THAXTON said, “When you arrested me I didn’t have the gun, though.”

129. CPD officers submitted the substances recovered from the bags found outside the window of the 924 North Hamlin third floor apartment to the Illinois State Police Laboratory for testing. According to the ISP Laboratory, one of the recovered substances weighed approximately 98.9 grams and contained heroin, and another weighed approximately 15.5 grams and contained cocaine.

130. According to court records, on or about January 28, 2019, MUHAMMAD-CURTIS pleaded guilty in the Circuit Court of Cook County, Illinois, to aggravated unlawful use of a weapon in connection with the pistol he possessed on October 16, 2018 near 924 North Hamlin.

131. Based on my training, experience, and familiarity with this investigation – including prior and subsequent surveillance of the activity outside 924 North Hamlin Avenue, prior and subsequent controlled purchases of narcotics from individuals at or near the North Hamlin drug spot, prior and subsequent intercepted calls, a subsequent intercepted call in which RANDALL LANGSTON stated that both of these seized guns belonged to him, the subsequent seizure of heroin and other narcotics from the same apartment, and police reports of this incident – I believe that (a) CLANTON, RANDALL LANGSTON, and other coconspirators used the third-floor of 924 North Hamlin as a stash house for narcotics and firearms; (b) MUHAMMAD-CURTIS and THAXTON worked for RANDALL

LANGSTON and CLANTON as armed lookouts and security for CLANTON DTO workers charged with storing and selling DTO narcotics at the North Hamlin drug spot; (c) MUHAMMAD-CURTIS and THAXTON obtained the seized Glock 23 and XD-9 pistols from LANGSTON, who directed both men to use those guns to provide armed security for the drug spot and all the narcotics stored at the stash house at 924 North Hamlin; (d) MUHAMMAD-CURTIS and THAXTON attempted to flee when they saw police because they knew that they possessed firearms in furtherance of the CLANTON DTO's drug sales; and (e) MUHAMMAD-CURTIS, THAXTON, or someone acting at their direction discarded the firearms, ammunition, and the DTO's narcotics supply outside the window of the 924 North Hamlin third floor apartment to avoid being caught with those items by police.

132. The next day, on or about October 17, 2018, at approximately 11:27 a.m. (Target Phone 1, session #18358), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with BRANDON LANGSTON, who was using Brandon Langston Phone 2. During this call, RANDALL LANGSTON said, “[T]he trap [stash house at 924 North Hamlin] got raided.” BRANDON LANGSTON asked RANDALL LANGSTON, “we still working [distributing narcotics]?” RANDALL LANGSTON replied, “It don’t stop nothing [the police raid on the stash house at 924 North Hamlin will not stop RANDALL LANGSTON and CLANTON DTO accomplices from distributing narcotics].” Later during the call, BRANDON LANGSTON and RANDALL LANGSTON also discussed bond court for “Naheem [MUHAMMAD-CURTIS]” and “Frank [THAXTON].”

133. Later that evening, at approximately 7:08 p.m. (Target Phone 1, session #18582), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-4724. During this call, UM-4724 stated, “I just got us a place [new location to stash and/or prepare narcotics for resale].” LANGSTON replied, “Alright where at?” UM-4724 said, “I’m downstairs.... I’m finna secure this key [for the new stash location]. And then me and you can go ahead and do what we got to do [move narcotics and/or items used in narcotics distribution to the new stash location.]”

134. On or about October 18, 2018, at approximately 8:33 a.m. (Target Phone 1, session #18774), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-8003. During this call, UM-8003 asked, “What happened to Naheem [MUHAMMAD-CURTIS]? . . . He got caught with a pipe [gun]?” RANDALL LANGSTON responded, “They [the police] ran in the crib [the stash house at 924 North Hamlin] They found the pipe [gun MUHAMMAD-CURTIS was carrying] and shit [heroin and drug packaging materials] on the roof. . . . Frank [THAXTON] got charged with a pipe [gun] too.”

135. The next week, on or about October 26, 2018, at approximately 7:08 p.m., Target Phone 1, session #22778), RANDALL LANGSTON, who was using Target Phone 1, had a phone conversation with UM-9535. During this call, UM-9535 said, “I need a pole [gun] man. What you got for me?” LANGSTON replied, “I just lost a pole, last week.... Lost two of them bitches XD [an XD pistol] and a Glock twenty-three [Glock 23 pistol].”

136. Based on my training, experience, and familiarity with this investigation – including the prior arrests of MUHAMMAD-CURTIS and THAXTON and the seizure of firearms and narcotics outside the third floor apartment of 924 North Hamlin Avenue, prior and subsequent surveillance of the activity outside 924 North Hamlin Avenue, and prior and subsequent controlled purchases of narcotics from RANDALL LANGSTON and individuals at or near the North Hamlin drug spot, prior and subsequent intercepted calls – I believe that, during the aforementioned calls, RANDALL LANGSTON, BRANDON LANGSTON, and others (a) discussed the October 16 arrests of MUHAMMAD-CURTIS and THAXTON and the seizure of firearms and narcotics outside the third floor apartment of 924 North Hamlin Avenue; (b) stated that the raid of the 924 North Hamlin Avenue stash house would not put a stop to the DTO’s sale of narcotics; (c) discussed the need to find a new stash house for DTO drugs and packaging materials; and (d) claimed ownership of the two firearms that police found MUHAMMAD-CURTIS and THAXTON carrying on the day of their arrests.

5. CLANTON and WYATT Found with 23.3 Grams of Heroin, 20.3 Grams of U-4770, and Ammunition at 924 North Hamlin Stash House (December 7, 2018)

137. On or about December 7, 2018, Judge Robert Kuzas of the Circuit Court of Cook County, Illinois, authorized a warrant to search the third floor apartment at 924 North Hamlin Avenue. CPD officers executed the search warrant the same day. According to Chicago police reports, during this search:

a. Officers encountered CLANTON in the kitchen, WYATT in the rear bedroom, and several other individuals in the front room playing dice.

b. In the closet of the rear bedroom where WYATT was located, officers found a package containing what was later determined to be approximately (i) at least 15.2 grams of a substance containing heroin, including three plastic bags containing approximately multiple smaller baggies of heroin, and (ii) approximately 20.3 grams of U-47700.

c. In the freezer located in the kitchen where CLANTON was found, officers discovered what was later determined to be approximately 8.1 grams of a substance containing heroin.

d. In another bedroom, officers found a latex glove containing approximately 13 rounds of .45 caliber ammunition.

e. Police took WYATT into custody and provided him *Miranda* warnings. WYATT agreed to speak with police without the assistance of counsel. During this interview, WYATT told police that all the drugs recovered during the search were his.

138. CPD officers submitted the substances recovered during the search of the 924 North Hamlin third floor apartment to the ISP Laboratory for testing. According to the ISP Laboratory, (a) one substance recovered from the closet of the bedroom where WYATT was found weighed approximately 15.2 grams and contained heroin, another substance recovered from the closet weighted approximately 20.3 grams and contained U-47770, and (b) the substance recovered from the freezer

located in the kitchen where CLANTON was found weighed approximately 8.1 grams and contained heroin.

139. Based on my training, experience, and familiarity with this investigation – including prior controlled purchases of narcotics from CLANTON and WYATT, prior and subsequent intercepted communications in which CLANTON and WYATT discussed the operation of the North Hamlin drug spot, and prior and subsequent surveillance of the activity outside 924 North Hamlin Avenue – I believe that CLANTON and WYATT (a) knowingly stored and controlled the heroin and U-47770 found inside the third floor apartment at 924 North Hamlin Avenue on December 7, 2018; and (b) intended to package those narcotics into smaller quantities and distribute those smaller quantities to other CLANTON DTO members for resale to customers at the North Hamlin drug spot.

CONCLUSION

140. Based on the foregoing, there is probable cause to believe that beginning no later than in or about March 2018, and continuing until no earlier than in or about December 2018, TRISTAN CLANTON, RANDALL LANGSTON, BRANDON LANGSTON, HEZEKIAH WYATT, LENOLIS MUHAMMAD-CURTIS, and FRANK THAXTON did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, namely, namely, 100 grams or more of a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I Controlled Substance and an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethy)-4-piperidinyl]

propanamide), a Schedule II Controlled Substance; 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of U-47700 (3,4-dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide), a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846.

FURTHER AFFIANT SAYETH NOT.

BRIAN C. DUDA
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on November 13, 2019.

SUNIL R. HARJANI
United States Magistrate Judge