

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LARRY DENNIS

CASE NUMBER: 21-CR-00100
UNDER SEAL

CRIMINAL COMPLAINT

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

Count One

On or about January 20, 2021, at Markham, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

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

Offense Description

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance

Count Two

On or about January 20, 2021, at Markham, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 922(g)(1)

Offense Description

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded Beretta model APX Centurion 9x19mm pistol, bearing serial number A064931X, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm.

This criminal complaint is based upon these facts:

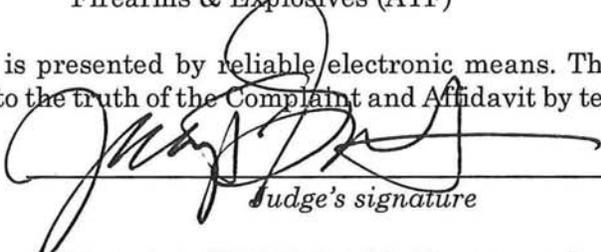
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02/10/21

DAVID LAMONTE
Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: February 10, 2021



Judge's signature

City and state: Chicago, Illinois

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, DAVID LAMONTE, being duly sworn, state as follows:

I. INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). I have been so employed since approximately 2014. Before that, I was employed as a Special Agent with the United States Secret Service since 2008. As part of my duties as an ATF Special Agent, I investigate criminal violations of federal firearms and drug-trafficking offenses, including but not limited to Title 18, United States Code, Sections 922 and 924, and Title 21, United States Code, Sections 841 and 846. I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage and importation of controlled substances.

2. I have received training in the area of narcotics investigations, money laundering, financial investigations and various methods which drug dealers use in an effort to conceal and launder the proceeds of their illicit drug-trafficking enterprises. I have participated in numerous investigations involving violations of narcotics laws.

3. This affidavit is submitted in support of a criminal complaint alleging that Larry D. Dennis ("DENNIS") has violated Title 21, United States Code, Section

841(a)(1) (Count One), and Title 18, United States Code, Section 922(g)(1) (Count Two).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law-enforcement personnel, and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging DENNIS with possession with intent to distribute cocaine, and unlawful possession of a firearm by a convicted felon, 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 defendant committed the offense alleged in the complaint.

5. This affidavit describes excerpts of written or recorded conversations, which I have summarized. These summaries do not necessarily refer to all of the topics covered during each conversation. In addition, these summaries do not include every conversation made by every writer/author on the topic being described. Portions of the conversations that are quoted are preliminary transcriptions, which may be subject to modification upon further review. For some conversations, I have offered my understandings and/or interpretations of the conversation, which are based upon my experience and knowledge of the investigation to date, the content and context of the conversations, the experience of other investigators with whom I have consulted, as well as my professional training and experience as a law-enforcement agent.

II. FACTS SUPPORTING PROBABLE CAUSE TO ARREST DENNIS FOR VIOLATING TITLE 21, UNITED STATES CODE, SECTION 841(A)(1)

A. PRIOR SEARCH WARRANT FOR THE SUBJECT PREMISES

6. On or about January 20, 2021, Midlothian Police Department (“MPD”) officers obtained Cook County, Illinois search warrants (the “Prior Search Warrant”), authorizing the search of 16644 South Marshfield Avenue, Markham, Illinois (the “Subject Premises”), the person of Larry D. Dennis (“DENNIS”), and a 2007 white Jeep Grand Cherokee bearing vehicle identification number (“VIN”) IJ8GR48K17C543411 (“Subject Vehicle 1”). The affidavit in support of the Prior Search Warrant, a copy which is attached as Exhibit 1 and incorporated by reference, sets forth the following relevant facts:

a. On or about August 16, 2020, a confidential source of information (“SOI-1”)¹ told MPD that DENNIS was involved in trafficking crack cocaine, and that SOI-1 had purchased crack cocaine from DENNIS at the Subject Premises on numerous prior occasions.

b. After being so informed, MPD officers set up surveillance of DENNIS at the Subject Premises on or about October 1, 2020, where they saw

¹ SOI-1’s criminal history includes no felony convictions. SOI-1 was registered by the MPD as an informant in or around August 2020, when SOI-1 agreed to assist MPD, hoping to receive sentencing credit for his/her pending criminal case for unlawful drug possession. Since then, MPD officers—with whom I have spoken on numerous occasions—have deemed the information provided by SOI-1 reliable and credible, and certain information from SOI-1 has been corroborated independently, including by monitored calls and surveillance. SOI-1 has never been paid by MPD or ATF for his/her services. No promises or assurances have been provided to SOI-1 by MPD or ATF regarding the resolution of his/her pending criminal case. While seeking the Prior Search Warrant, MPD officers made SOI-1’s criminal history and pending case available to the signing Cook County judge.

repeated patterns of activity consistent with hand-to-hand drug deals. Specifically, as different cars arrived periodically at the Subject Premises, officers saw DENNIS exit the residence, approach the driver's side of the vehicle, reach one arm inside and conduct a physical exchange with the occupant(s), before the recipient's car drove away, typically within seconds. After receiving the foregoing information from SOI-1 and making the foregoing observations during surveillance, MPD officers invited ATF agents to begin a joint investigation into DENNIS's drug-trafficking operation.

c. After joining the investigation, ATF agents—in or around October 2020—installed a pole camera at a property near the Subject Premises, with the consent of that property's owner. Reviewing footage captured by the pole camera, ATF agents saw DENNIS engaging in the recurring pattern mentioned above, consistent with hand-to-hand drug deals.

d. On or about December 22, 2020, the pole camera captured what appeared to be an armed altercation between DENNIS and another individual, during which DENNIS confronted the individual near the Subject Premises while pointing an object that appeared consistent with a firearm, and took what appeared to be money from that individual.

e. MPD officers and ATF agents conducted another surveillance operation, on or about January 11, 2021, at the Subject Premises, where they saw DENNIS engaging in the same recurring pattern mentioned above, consistent with hand-to-hand drug deals. That same day, law enforcement also followed DENNIS as he drove to different locations in Subject Vehicle 1, engaging in repeated patterns of

activity consistent with hand-to-hand drug deals. Specifically, law enforcement saw DENNIS meeting with different individuals at their residences, where they would exit their homes, approach Subject Vehicle 1 while DENNIS was still inside, and reach into the car for a quick hand-to-hand transaction, before DENNIS drove away shortly thereafter.

f. Between on or about January 12 and January 13, 2021, MPD officers conducted trash pulls at the Subject Premises, from where they recovered numerous indicia of occupancy (including a utility bill and bank statement) indicating that DENNIS lives at the Subject Premises. From the trash, officers also recovered indicia of drug trafficking, including numerous plastic baggies (some of which contained suspected cannabis remnants) and cellophane packaging.

g. On or about January 13, 2021, another confidential source of information (“SOI-2”)² told MPD and ATF that DENNIS was involved in trafficking crack cocaine, and that SOI-2 had purchased crack cocaine from DENNIS at the Subject Premises on numerous prior occasions. SOI-2 also said that DENNIS—

² SOI-2’s criminal history includes prior felony convictions for retail theft, burglary, as well as manufacture/delivery of controlled substances. SOI-2 was registered by the MPD as an informant in or around January 2021, when SOI-2 agreed to assist MPD hoping to receive sentencing credit for his/her pending criminal case for misdemeanor possession of drug paraphernalia. Since then, MPD officers—with whom I have spoken on numerous occasions—and I have deemed information provided by SOI-2 to be reliable and credible, and certain information from SOI-2 has been corroborated independently, including by monitored calls and surveillance. SOI-2 has never been paid by MPD or ATF for his/her services. No promises or assurances have been provided to SOI-2 by MPD or ATF regarding the resolution of his/her pending criminal case. While seeking the Prior Search Warrant, MPD officers made SOI-2’s criminal history and pending case available to the signing Cook County judge.

driving Subject Vehicle 1—delivered drugs to SOI-2 at his/her own home within the previous week.

h. SOI-2 conducted controlled purchases of suspected crack cocaine from DENNIS on or about January 13 and 15, 2021, each time at a pre-arranged public place, where DENNIS was observed arriving in Subject Vehicle 1. Then, on or about January 15, 2021, SOI-2 conducted yet another controlled purchase of suspected crack cocaine from DENNIS at the Subject Premises. Subsequent field tests of the drugs that SOI-2 obtained from DENNIS on each occasion confirmed the presence of cocaine.

**B. ADDITIONAL BACKGROUND INFORMATION ABOUT LARRY DENNIS'S
DRUG-TRAFFICKING ACTIVITIES AND KNOWN VEHICLES**

7. On or about October 9, 2020, an MPD officer on patrol in Midlothian, Illinois, saw a silver Oldsmobile Silhouette bearing Indiana temporary license plate 4399036 and VIN 1GHDX03E31D331437 ("Subject Vehicle 2") make an illegal turn without signaling. The officer then initiated a traffic stop and made contact with DENNIS, the driver of Subject Vehicle 2. During their interaction, DENNIS spontaneously uttered that he was in possession of brass knuckles. The officer, in response, asked DENNIS to exit Subject Vehicle 2 and conducted a protective pat-down search, recovering a pair of brass knuckles from DENNIS's sweater pocket. DENNIS was then arrested for unlawful use of a weapon and possession of brass knuckles, and transported to the MPD station for processing. There, while being searched incident to arrest, an officer recovered a loose, small white rocklike substance from DENNIS's front pants pocket. On or about January 28, 2020, that

rocklike substance was subjected to a field test, and was positive for the presence of cocaine.

8. As noted above, MPD officers and ATF agents conducted a surveillance operation at the Subject Premises on or about January 11, 2021, where they saw DENNIS engaging in patterns of activity consistent with hand-to-hand drug deals. At one point during the surveillance operation, law enforcement saw DENNIS enter Subject Vehicle 2 (the same vehicle that DENNIS drove at the time of his October 2020 arrest), which was parked on Marshfield Avenue near the Subject Premises, and drive away.

C. EXECUTION OF THE PRIOR SEARCH WARRANT AT THE SUBJECT PREMISES, ARREST OF DENNIS, AND SEIZURE OF THE SUBJECT PHONES

9. On or about January 20, 2021, law enforcement executed the Prior Search Warrant at the Subject Premises.³ There, in relevant part, agents found the following relevant evidence and made the following relevant observations:

a. Before executing the Prior Warrant, investigators saw DENNIS exiting the Subject Premises and walking along the sidewalk, where they stopped him and placed him in custody. Thereafter, while conducting a protective sweep for other occupants, investigators found no one else inside the Subject Premises.

b. While searching DENNIS incident to arrest, agents recovered a black iPhone ("Subject Phone 1") and a black Motorola cell phone ("Subject Phone 2").

³ Law enforcement also executed warrants on DENNIS's person at the same time. The search warrant for Subject Vehicle 1, which was not on scene that day, remained unexecuted.

While being processed, DENNIS asked to use his cell phone to call his girlfriend and identified both Subject Phone 1 and Subject Phone 2 as belonging to him.

c. From a laundry room at the Subject Premises, agents found four firearms, namely, two semiautomatic shotguns, one lever-action rifle, and one semiautomatic handgun. The two shotguns, which were unloaded, were standing vertically in the southwest corner of the room. The rifle, also unloaded, was hidden between the unfinished wall studs behind a shelving unit on the south wall of the laundry room. These three unloaded long guns were enclosed in their own gun cases. The handgun—a Beretta model APX Centurion 9x19mm pistol bearing serial number A064931X, loaded with approximately fourteen live rounds—was hidden between the rafters of the wall on the south side of the laundry room. In the northwest corner of the same laundry room, agents found a black Wiko cellular phone (“Subject Phone 3”) in a shoebox, along with several documents bearing DENNIS’s name. Further, the laundry room contained other boxes of personal effects, including male clothing items and various papers bearing DENNIS’s name, along the wall where the Beretta model APX Centurion pistol was recovered.

i. Based on my training, experience, knowledge of this investigation, and conversations with other law-enforcement agents with relevant experience, I know that drug trafficking is a dangerous business, and that drug traffickers commonly arm themselves with firearms to protect themselves and their illicit product. Further, I know that handguns—which are readily concealable—are a preferred firearm for drug traffickers.

d. On top of a dining-room hutch, agents found a black LG cellular telephone ("Subject Phone 4"), along with suspected crack cocaine packaged for delivery that subsequently field-tested positive for the presence of cocaine, as well as mail, a credit card, an Illinois State identification card, and a social security card bearing the name Larry DENNIS.

e. From other locations throughout the Subject Premises, law enforcement recovered additional suspected crack cocaine and controlled substances, including pills, as well as digital scales, plastic baggies, and other paraphernalia typically used for the packaging of illegal drugs, and approximately \$2,016.05 in cash.

i. Based on my training and experience, knowledge of this investigation, and conversations with other law-enforcement agents with relevant knowledge, I know that digital scales and plastic baggies are commonly used tools of the drug-trafficking trade. Further, I know that illicit drug trafficking is typically a cash-only business, and the denominations of currency seized from the Subject Premises, primarily \$1 and \$20 bills, are commonly used in street-level drug transactions, a conclusion buttressed by DENNIS's observed actions in numerous controlled drug purchases and on pole-camera footage, as described further herein.

f. In total, investigators recovered approximately 8 plastic baggies containing around two grams of suspected crack cocaine from the Subject Premises, which subsequently field-tested positive for the presence of cocaine. Investigators also found a digital scale that was coated in a white residue, suspected to be cocaine.

i. Based on my training and experience, knowledge of this investigation, and conversations with other law-enforcement agents with relevant knowledge, I know that a typical user quantity of crack cocaine is a “rock,” consisting of approximately 0.1 to 0.2 grams of crack cocaine. Here, approximately 20 individual servings of suspected crack cocaine were recovered from the Subject Premises. Combining the volume of suspected crack cocaine seized from the Subject Premises with the manner in which the drugs were packaged for resale, I believe that these drugs were intended for distribution, a conclusion buttressed by DENNIS’s observed actions in numerous controlled drug purchases and on pole-camera footage, as described further herein.

10. Following his arrest, DENNIS was charged in the Circuit Court of Cook County, Illinois, with drug- and firearm-related offenses. On or about January 21, 2021, following a bond hearing, DENNIS was released on pretrial-release conditions.

D. DENNIS’S ONGOING DRUG-TRAFFICKING ACTIVITIES AT THE SUBJECT PREMISES, WHILE UNDER STATE BOND CONDITIONS

11. Following DENNIS’s release from custody, ATF agents continued to monitor activity from the pole camera covering the Subject Premises. In relevant part, footage captured from the pole camera on or about January 24, 2021 shows the following activity:

a. At approximately 10:27 AM, DENNIS arrived at the Subject Premises residence while driving Subject Vehicle 1. He parked in the driveway and

went into the house through the south side door.⁴ Around 15 minutes later, DENNIS emerged from the Subject Premises while speaking on a cellular phone. DENNIS then walked to the bottom of the driveway, appearing to wait for someone's arrival. He kept speaking on the phone and then walked back inside the Subject Premises.

b. At approximately 10:54 a.m., a gold-colored SUV pulled into the driveway of the Subject Premises. DENNIS emerged from his home while speaking on his cellular phone, approached the driver's window, and reached into the window for a moment, before turning around and walking back into the Subject Premises as the SUV departed.

c. At approximately 12:28 p.m., DENNIS drove away in Subject Vehicle 1, returning to the Subject Premises at approximately 1:07 p.m. and parking in the driveway. Shortly thereafter, a blue Hyundai pulled into the driveway behind DENNIS, who reached into his right-pant pocket and removed a clear plastic bag. Then, DENNIS rummaged through the bag momentarily, and then handed an object to the driver of the blue Hyundai through the open car window. Moments later, the Hyundai drove away as DENNIS reentered Subject Vehicle 1.

d. At approximately 2:10 p.m., DENNIS exited the Subject Premises and entered Subject Vehicle 1, which was parked in the driveway. About one minute later, a male walked up the driveway as DENNIS exited Subject Vehicle 1, before handing a small object to the male using one hand, while DENNIS held a cellular

⁴ This marked a departure from DENNIS's previously observed behavior of using the north-side door, which was still boarded up following the execution of the Prior Search Warrant on or about January 20, 2021, and DENNIS's release from custody on or about January 21, 2021.

phone to his ear with the other. Shortly thereafter, DENNIS went back into the Subject Premises as the male walked away.

e. At approximately 2:14 p.m., DENNIS left the Subject Premises and walked up to a white sedan with tinted windows that parked on a nearby street, partially out of the pole camera's view. DENNIS walked up to the passenger-side door, and seconds later, the sedan pulled away as DENNIS walked back to Subject Vehicle 1—which was parked in the driveway of the Subject Premises—while he talked on his cellular phone.

f. At approximately 3:54 p.m., a minivan pulled into the driveway of the Subject Premises. A male exited the vehicle and met with DENNIS. Then, the male returned to the minivan and parked it on the street, while DENNIS entered the Subject Premises through the south-side door, before returning moments later and exchanging a small item by hand with the male in the driveway. Shortly after, the male subject departed.

12. In relevant part, footage captured from the pole camera on or about February 2, 2021 shows the following activity:

a. At approximately 10:27 a.m., DENNIS arrived at the Subject Premises residence while driving Subject Vehicle 2. He parked in the driveway and went into the house through the south-side door. About twenty minutes later, he exited the house and appeared to retrieve something from Subject Vehicle 2, then returned into the Subject Premises through the south door. About ten minutes after that, a silver vehicle arrived and pulled into the driveway. DENNIS exited the

Subject Premises and approached the driver's window while appearing to hold a cell phone in one hand. DENNIS reached into the driver's window with his other hand, and then returned to the Subject Premises while the silver vehicle departed.

b. At approximately 12:36 p.m., DENNIS exited the Subject Premises and approached Subject Vehicle 2 in the driveway. He opened the driver's door and appeared to reach in. At that time, a male subject approached the Subject Premises on foot and DENNIS met with him momentarily on the driveway. DENNIS reached out, and the two of them exchanged something hand-to-hand. The male subject then immediately walked away as DENNIS reentered the Subject Premises through the front door.

13. In relevant part, footage captured from the pole camera on or about February 3, 2021 shows the following activity:

a. At approximately 11:35 a.m., DENNIS arrived at the Subject Premises while driving Subject Vehicle 2. He parked in the driveway and went into the house through the south-side door.

b. At approximately 11:57 a.m., DENNIS exited the Subject Premises while appearing to speak on a cell phone. He walked around the front of the residence while appearing to look up and down the street. He sat in the driver's seat of Subject Vehicle 2. About ten minutes later, a black car pulled into the driveway and stopped near Subject Vehicle 2. DENNIS exited his vehicle and walked up to the driver's window of the black car. DENNIS appeared to pull one hand out of his jacket

pocket and reach in the direction of the driver's window. The black vehicle then departed as DENNIS sat back down in Subject Vehicle 2.

c. At approximately 12:09 p.m., a silver car pulled into the driveway of the Subject Premises and stopped nearby Subject Vehicle 2. DENNIS exited his vehicle and walked up to the driver's window of the silver car, and reached one hand in. After a short conversation, the silver car departed while DENNIS returned to and departed in Subject Vehicle 2.

d. At approximately 12:51 p.m., DENNIS exited the Subject Premises and opened the driver's door of Subject Vehicle 2. He stood in the doorway while appearing to reach into the vehicle. At that point, a dark sedan pulled into the driveway of the Subject Premises and stopped nearby Subject Vehicle 2. DENNIS walked up to the sedan's driver window and reached into it. The sedan then left while DENNIS returned to and departed in Subject Vehicle 2.

e. At approximately 2:25 p.m., a black car pulled up in front of the Subject Premises and stopped on the street while the driver waited in the vehicle. A few minutes later, DENNIS arrived and parked Subject Vehicle 2 in the driveway of the Subject Premises. DENNIS exited Subject Vehicle 2 and went inside the Subject Premises through the south door. About one minute later, DENNIS exited the Subject Premises and walked up to the driver's window of the black car. DENNIS appeared to make a hand-to-hand transaction with the driver and then walked away as the black car departed.

f. As DENNIS was leaving the prior hand-to-hand transaction, a silver vehicle pulled up near him in the street. DENNIS turned around, approached the driver's window of that vehicle, and then extended his one arm towards the driver's window, before walking away as the vehicle departed.

g. At approximately 2:38 p.m., DENNIS arrived at the Subject Premises and parked Subject Vehicle 2 in the driveway. He exited the vehicle while a black car simultaneously arrived and stopped on the street in front of the residence. DENNIS approached the black car and reached into the driver's window with one hand. The black car then departed while DENNIS returned to the driver's seat of Subject Vehicle 2 and departed the area.

h. At approximately 2:45 p.m., DENNIS arrived at the Subject Premises in Subject Vehicle 2, as a black car simultaneously arrived and parked on the driveway. DENNIS approached the black car and reached into the driver's window with one hand. The black car departed while DENNIS returned to the driver's seat of Subject Vehicle 2. He then exited Subject Vehicle 2 and went inside the Subject Premises.

i. At approximately 3:22 p.m., a white sedan pulled in front of the Subject Premises and stopped on the street. Shortly thereafter, DENNIS arrived in Subject Vehicle 2 and stopped alongside the white sedan on the street. DENNIS stepped out of his vehicle and approached the driver's window of the white sedan, appearing to reach into the driver's window of the white sedan. DENNIS then

reentered Subject Vehicle 2, maneuvering into the Subject Premises driveway as the white sedan departed. Later, DENNIS departed the area in Subject Vehicle 2.

j. At approximately 4:42 p.m., a gray sedan pulled in front of the Subject Premises and stopped on the street. After exiting the Subject Premises, DENNIS went to the driver's door of Subject Vehicle 2, parked in the driveway, and appeared to retrieve something. He then walked up to the driver's window of the gray sedan. After a short conversation, he appeared to make a hand-to-hand transaction through the driver's window, before the gray sedan drove away. DENNIS then walked up the driveway and had a conversation with another subject, who was driving a black Audi sedan. DENNIS then went to the area near the Subject Premises' north door and bent over for a few seconds.

k. At approximately 4:45 p.m., a blue Hyundai coupe pulled into the driveway and stopped. DENNIS walked up to that vehicle's driver window and reached in with one hand. The Hyundai pulled away and departed while DENNIS returned to the area of the Subject Premises' north door and bent over again. He then got into the driver's seat of Subject Vehicle 2 while holding a white piece of paper in his right hand and departed. Investigators could see an upside-down white flower pot that appeared to be located outside the Subject Premises' north-door area.

l. At approximately 7:32 p.m., DENNIS arrived at the Subject Premises, now driving Subject Vehicle 1. Shortly after he arrived, a dark-colored Jeep pulled in front of the Subject Premises and stopped on the street. DENNIS exited Subject Vehicle 1 and walked up to the dark-colored Jeep's driver window. After a

few seconds, the Jeep pulled away and departed while DENNIS waited in front of the residence.

m. At approximately 7:44 p.m., a wagon-style vehicle pulled up in front of the Subject Premises and stopped on the street. DENNIS exited the Subject Premises and approached the wagon's driver window. Seconds later, the wagon departed while DENNIS walked up the driveway and opened the driver's door of Subject Vehicle 1. He appeared to reach into the driver's area of Subject Vehicle 1 and then reenter the Subject Premises.

14. Based on my training and experience, my review of the above-mentioned pole-camera footage, my conversations with MPD officers involved in the investigation as well as with SOI-2, and my participation in the execution of the Prior Search Warrant, I believe that the foregoing activity captured by the pole camera indicates that DENNIS continues to engage in hand-to-hand drug transactions at the Subject Premises, despite being on bond conditions from the Circuit Court of Cook County, Illinois, which obligate defendant not to commit any new criminal offenses.

E. EVIDENCE SEIZED FROM THE SUBJECT PHONES

15. On or about February 5, 2021, relying on the foregoing facts, the Hon. Maria Valdez, United States Magistrate Judge, issued a warrant authorizing the search of the Subject Premises, as well as for Subject Phone 1 through Subject Phone 4 (the "Subject Phones"), for evidence, fruits, instrumentalities, and contraband relating to federal drug-trafficking and firearms offenses. Judge Valdez also issued a warrant authorizing agents to obtain a buccal swab from DENNIS, for a DNA sample.

16. On or about February 8, 2021, agents executed the search warrant for the Subject Phones, which continue to be reviewed for responsive evidence as of this submission. Following a preliminary review, agents recovered the following images from Subject Phone 1, which was found in DENNIS's possession on or about January 20, 2021, and which DENNIS identified as belonging to him:

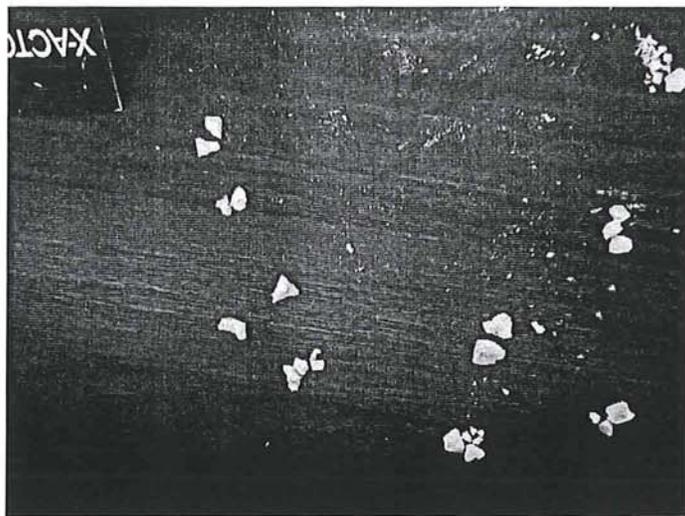


Image 1

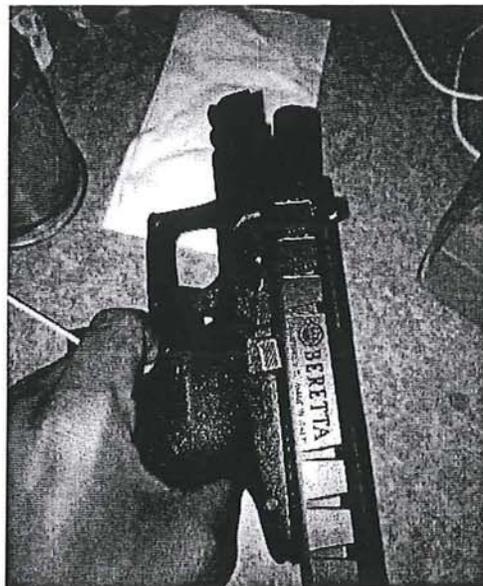


Image 2

17. Based on my training, experience, and knowledge of the facts in this investigation, I believe the following to be true:

a. Image 1 appears to depict loose rocks of suspected crack cocaine, which are similar in appearance as the suspected crack cocaine seized from the Subject Premises during execution of the Prior Warrant. Metadata associated with Image 1 indicates that it was taken on or about July 29, 2020, before agents seized suspected crack cocaine from the Subject Premises on or about January 20, 2021.

b. Although the serial number of the firearm in Image 2 is not visible, the image appears to show the make of the firearm ("Beretta"), which bears the embossed words "Made in Italy." Metadata associated with Image 2 indicates that it was taken on or about January 1, 2021, before the Beretta firearm was seized from the Subject Premises on or about January 20, 2021. Further, the countertop seen in the background of Image 2 bears similar physical characteristics as the countertop in the kitchen of the Subject Premises, which I saw during execution of the Prior Warrant. From reviewing and handling the Beretta firearm seized from the Subject Premises myself, I believe that Image 2 shows the same, or substantially the same, handgun as the one seized from the laundry room at the Subject Premises.

F. DENNIS'S CRIMINAL HISTORY

18. Based on my review of criminal-history records maintained by the Circuit Court of Cook County, I know that DENNIS was previously convicted:

a. In 1999, for armed robbery and sentenced to 72 months' imprisonment;

b. In 2011, for aggravated unlawful use of a weapon, and sentenced to 36 months' imprisonment; and

c. In 2013, for bribery, and sentenced to 48 months' imprisonment.

G. INTERSTATE NEXUS OF HANDGUN PREVIOUSLY SEIZED FROM THE SUBJECT PREMISES

19. I am a certified interstate-nexus expert, specifically trained by ATF in identifying where firearms were manufactured. Based on my training and experience, and my examination of the below firearm seized from the Subject Premises on or about January 20, 2021, during execution of the Prior Search Warrant, I know that:

a. The Beretta model APX Centurion 9x19mm pistol, bearing serial number A064931X, was manufactured in Italy.

b. Based on firearms-trace records kept by the ATF, on or about September 26, 2020, the Beretta firearm was purchased from a federally licensed dealer located in Wisconsin.

c. To be found in Illinois at the Subject Premises on or about January 20, 2021, the firearm must have traveled in interstate or foreign commerce.

III. CONCLUSION

20. Based on the above information, I submit that there is probable cause to believe that on or about January 20, 2021, Larry D. DENNIS possessed crack cocaine with the intent to distribute, and unlawfully possessed a firearm after having been convicted of a felony.

21. I therefore respectfully request that this Court issue a criminal complaint and arrest warrant, charging DENNIS with a violation of Title 21, United

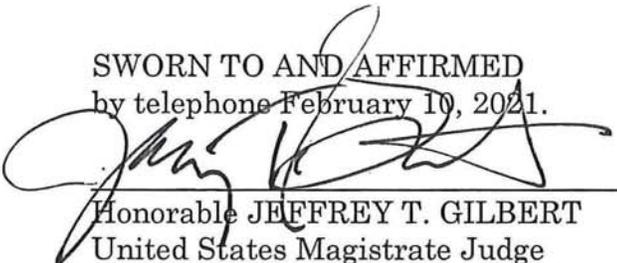
States Code, Section 841(a)(1) (Count One), and Title 18, United States Code, Section 922(g)(1) (Count Two).

FURTHER AFFIANT SAYETH NOT.


02/10/21

DAVID LAMONTE
Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

SWORN TO AND AFFIRMED
by telephone February 10, 2021.



Honorable JEFFREY T. GILBERT
United States Magistrate Judge