

FILED

5/25/2021

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISIONTHOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

CASE NUMBER
UNDER SEAL**21 CR 334**

FRANCISCO SANCHEZ-YANEZ, a/k/a "Chico";
DIEGO GALEANA-GONZAGA;
SERGIO SANCHEZ-CHAVEZ;
JUAN ROSAS-CABRERA;
VIRGINIA VAZQUEZ-PEREZ a/k/a "Vica," a/k/a "Vicky";
and
DELVIN WILLIAMS, a/k/a "Convict"

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 July 8, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants FRANCISCO SANCHEZ-YANEZ, DIEGO GALEANA-GONZAGA, SERGIO SANCHEZ-CHAVEZ, and JUAN ROSAS-CABRERA violated:

Code Section

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

Offense Description

knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance

COUNT TWO

On or about July 8, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant VIRGINIA VAZQUEZ-PEREZ violated:

Code Section

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

Offense Description

knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and

substance containing a detectable amount of
heroin, a Schedule I Controlled Substance

COUNT THREE

On or about July 8, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant DELVIN WILLIAMS violated:

Code Section

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

Offense Description

knowingly and intentionally possessed with
intent to distribute a controlled substance,
namely, 100 grams or more of a mixture and
substance containing a detectable amount of
heroin, a Schedule I Controlled Substance

COUNT FOUR

On or about November 23, 2020, at Brookfield, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant DELVIN WILLIAMS violated:

Code Section

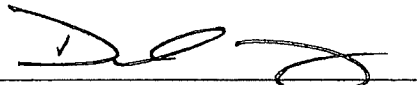
Title 21, United States Code, Sections
841(a)(1)

Offense Description

knowingly and intentionally possessed with
intent to distribute a controlled substance,
namely, 28 grams or more of a mixture and
substance containing a detectable amount of
cocaine base, a Schedule II Controlled Substance,
and a mixture and substance containing a
detectable amount of heroin, a Schedule I
Controlled Substance.

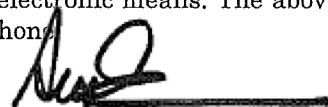
This criminal complaint is based upon these facts:

X Continued on the attached sheet.


DANIEL NAGY, Special Agent, Homeland
Security Investigations (HSI)

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 foregoing by telephone.

Date: May 25, 2021


Judge's signature

City and state: Chicago, Illinois

SUSAN E. COX, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Ss

AFFIDAVIT

I, DANIEL NAGY, being duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI). I have been so employed since approximately February 2006. As part of my duties as a HSI Special Agent, I investigate criminal violations relating to narcotics trafficking offenses, including criminal violations of the Federal Controlled Substance laws, including, but not limited to Title 18, United States Code, Sections 1956, and 1957, and Title 21, United States Code, Sections 841, 843, 846, 848, 952 and 963. 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. This affidavit is submitted in support of a criminal complaint alleging that (1) on or about July 8, 2020, FRANCISCO SANCHEZ-YANEZ, DIEGO GALEANA-GONZAGA, SERGIO SANCHEZ-CHAVEZ, and JUAN ROSAS-CABRERA knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); (2) on or about July 8, 2020, VIRGINIA VAZQUEZ-PEREZ knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a

detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); (3) on or about July 8, 2020, DELVIN WILLIAMS knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); and (4) on or about November 23, 2020, DELVIN WILLIAMS knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offenses alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement officers (LEOs), review of court-authorized wire intercepts, information provided by a cooperating defendant ("CD3"),¹ consensually

¹ CD3 began cooperating in this investigation in late August 2020, subsequent to an arrest for violations of the Immigration Nationality Act. CD3 has consented, in writing, to the interception and recording of all calls made to and from CD3's phone. Additionally, CD3 has provided LEOs with background and intelligence information relative to this investigation. LEOs have independently corroborated this information through the review of court-authorized interception of wire and electronic communications, physical surveillance, and information received from other confidential sources. Based on law enforcement's review of CD3's consensually recorded phone calls and surveillance, CD3 has proven reliable and

recorded jail calls, physical surveillance, mobile tracking devices, my training and experience, and the training and experience of other law enforcement officers.

FACTS SUPPORTING PROBABLE CAUSE

4. As further detailed below, FRANCISCO SANCHEZ-YANEZ and DIEGO GALEANA-GONZAGA worked together on July 8, 2020, to distribute heroin to VIRGINIA VAZQUEZ-PEREZ and DELVIN WILLIAMS. Based on the intercepted calls and surveillance, SANCHEZ-YANEZ took direction from SERGIO SANCHEZ-CHAVEZ, believed to be based in Mexico, while JUAN ROSAS-CABRERA supplied the heroin to SANCHEZ-YANEZ on behalf of SANCHEZ-CHAVEZ. Separately, WILLIAMS also distributed crack cocaine to a confidential source on numerous occasions.

I. SANCHEZ AND GONZAGA WORK WITH CHAVEZ AND ROSAS TO DISTRIBUTE HEROIN TO VAZQUEZ AND TO WILLIAMS

A. On July 7, 2020, SANCHEZ and GONZAGA Collect Narcotics Proceeds and Distribute a Sample of Heroin.

5. Analysis of call detail records for telephone number (312) 871-7556 ("Subject Phone 47"),² believed to be used by FRANCISCO SANCHEZ-YANEZ (SANCHEZ),³ revealed that on or about July 7, 2020, between 7:57 a.m. and 10:27

truthful. CD3 has felony convictions for possession of cocaine and aggravated fleeing and eluding from a police officer. CD3 has not been paid for his/her cooperation, and no promises have been made regarding any potential benefit CD3 may receive for CD3's cooperation. CD3 is cooperating in the hope of obtaining some benefit from the government in connection with potential federal criminal charges that CD3 is facing and also in the hope of obtaining some benefit from the government in connection with CD3's immigration status.

² On or about July 8, 2020, Chief Judge Rebecca R. Pallmeyer authorized the installation of a pen register and trap and trace device on Subject Phone 47, for a period of 60 days.

³ LEOs believe that SANCHEZ is the user of Subject Phone 47 based on the following: On or about July 3, 2020, using a pole camera, LEOs observed SANCHEZ standing behind his

a.m., Subject Phone 47 was in contact with telephone number (708) 556-6143 ("Subject Phone 49"),⁴ believed to be used by DELVIN WILLIAMS,⁵ approximately four times. Based on my knowledge of the investigation, my training and experience, and the intercepted calls summarized below, I believe SANCHEZ contacted WILLIAMS and made arrangements to pick up an unknown amount of narcotics proceeds that WILLIAMS owed SANCHEZ from a previous narcotics transaction.

6. On or about July 7, 2020, at approximately 10:49 a.m. (call session #249), SANCHEZ, who was using telephone number (773) 673-7057 ("Target Phone 14")⁶ attempted to communicate with SERGIO SANCHEZ-CHAVEZ (CHAVEZ), who

residence located at 6125 South Talman Avenue in Chicago. At approximately 2:35 p.m., a LEO familiar with SANCHEZ's voice placed an outgoing call to Subject Phone 47. The LEO who placed the call observed SANCHEZ, who was positively identified based on his March 2010 Chicago Police Department arrest photograph, answer a cell phone in his possession. During the conversation, the LEO asked to speak with "Richard." SANCHEZ told the LEO that the LEO had the wrong number.

⁴ On or about July 10, 2020, Chief Judge Rebecca R. Pallmeyer authorized the installation of a pen register and trap and trace device on Subject Phone 49, believed to be used by WILLIAMS, for a period of 60 days.

⁵ LEOs believe that WILLIAMS is the user of Subject Phone 49 based on the following: On or about June 19, 2020, WILLIAMS utilized Subject Phone 49 to arrange the pick-up of a sample of narcotics from SANCHEZ. More specifically, at approximately 5:01 p.m. (call session #132), SANCHEZ received an incoming call on Target Phone 14 from WILLIAMS who was using Subject Phone 49. During the conversation, SANCHEZ asked, "Yeah, you're here?" WILLIAMS replied, "Yeah." SANCHEZ stated, "Alright, I'll go in the back right now." Several minutes later, using a pole camera, LEOs observed a silver Ford Expedition, bearing Virginia license plate UPJ8897, arrive and park in the alley behind SANCHEZ's residence at 6125 S. Talman Avenue in Chicago. Moments later, LEOs observed WILLIAMS, who was positively identified based on WILLIAMS' State of Illinois driver's license photograph, exit the vehicle and accompany SANCHEZ into the backyard of SANCHEZ's residence. According to Enterprise Rent-A-Car, on or about June 16, 2020, the silver Ford Expedition was rented by an individual who presented WILLIAMS' State of Illinois driver's license.

⁶ On or about June 9, 2020, Chief Judge Rebecca R. Pallmeyer issued an order authorizing the interception of wire communications to and from Target Phone 14, used by FRANCISCO SANCHEZ, for a period of 30 days. On or about July 9, 2020, Chief Judge Rebecca R. Pallmeyer issued an order authorizing the continued interception of wire communications to

was using Mexican telephone number 52-44-3286-6775 ("Chavez Phone 1").⁷ While SANCHEZ waited for the call to be answered, SANCHEZ directed an unknown individual, to "bring the photo [sample of narcotics]...no just one." The call to CHAVEZ went unanswered. Based on my knowledge of the investigation, my training and experience, and surveillance detailed below, I believe SANCHEZ directed the unknown individual to bring a sample of narcotics, which SANCHEZ intended to deliver to VIRGINIA VAZQUEZ-PEREZ (VAZQUEZ).

7. At approximately 10:54 a.m. (call session #251), SANCHEZ, using Target Phone 14, communicated with VAZQUEZ, who was using telephone number

and from Target Phone 14, used by FRANCISCO SANCHEZ, for a period of 30 days. LEOs intercepted communications over Target Phone 14 from on or about June 10, 2020, through July 17, 2020. The transcripts of the intercepted conversations described in this Affidavit remain in draft form; to the extent quotations from the conversations are included, they are preliminary, not final. The summaries of recorded conversations in this affidavit do not include reference to all of the topics covered during the conversations. In certain instances, I will offer my interpretations of certain recorded conversations in brackets and otherwise. My understanding of these conversations is aided by the content and context of the conversations, my familiarity with the facts and circumstances of the investigation, my experience as a law enforcement agent, my discussions with other law enforcement agents and officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation. Some of the recorded conversations were in the Spanish language, including those between SANCHEZ and his coconspirators including GALEANA-GONZAGA, SANCHEZ-CHAVEZ, VAZQUEZ-PEREZ, and ROSAS-CABRERA. For these conversations, I have relied on draft English translations of the conversations made by Spanish-speaking officers. The times listed for the recorded conversations are approximate.

⁷ LEOs believe that SERGIO SANCHEZ-CHAVEZ is the user of Chavez Phone 1 based on the following: On or about March 10, 2021, LEOs met with CD3 and showed CD3 a 2016 Immigration and Customs Enforcement ("ICE") arrest photo of SERGIO SANCHEZ-CHAVEZ. CD3 identified the individual in the photograph as "Sergio Sanchez," and the user of Chavez Phone 1. Further, according to Western Union records, between approximately March 24, 2018 and July 7, 2020, SERGIO SANCHEZ-CHAVEZ received approximately 5 wire transfers in Morelia, Michoacán, Mexico sent from currency exchanges located in Chicago. For all 5 of the transactions, SANCHEZ-CHAVEZ provided the Western Union agent with his full name, date of birth (November 5, 1984) and Chavez Phone 1.

(773) 818-5603 ("Vazquez Phone 1").⁸ During the call, SANCHEZ stated, "Hey, it's me Chico...what are you doing?" VAZQUEZ replied, "Working, working." SANCHEZ stated, "Oh, I have to go take you a picture [sample of narcotics]." VAZQUEZ replied, "Okay." SANCHEZ stated, "I'll call you like in 45." VAZQUEZ stated, "Ok, I'm at work though, okay?" SANCHEZ replied, "Yeah, you work in the same spot, right?" VAZQUEZ replied, "Yeah." Based on my knowledge of the investigation, my training and experience, and as detailed below in paragraphs 19 (call session # 262) and 25 (call session # 274), I believe SANCHEZ arranged to deliver a sample of heroin to VAZQUEZ, at the direction of CHAVEZ.

8. At approximately 10:59 a.m., using a pole camera, LEOs observed SANCHEZ⁹ and DIEGO GALEANA-GONZAGA (GONZAGA)¹⁰ enter SANCHEZ's black 2019 Infiniti SUV bearing Illinois license plate BX65432 (Subject Vehicle 5),¹¹

⁸ LEOs believe that VAZQUEZ-PEREZ is the user of telephone number (773) 818-5603 based on the following: As described in greater detail below in paragraph 41, on or about July 8, 2020, at approximately 3:18 p.m., LEOs seized approximately 283.55 grams of heroin from VAZQUEZ-PEREZ during a traffic stop after LEOs observed DIEGO GALEANA-GONZAGA place the heroin inside VAZQUEZ-PEREZ's unoccupied vehicle. LEOs confirmed VAZQUEZ-PEREZ's identity based on her State of Illinois driver's license which she produced during the traffic stop. A LEO who spoke with VAZQUEZ-PEREZ during the traffic stop has listened to call session #251 and determined that VAZQUEZ-PEREZ is the user of telephone number (773) 818-5603. Additionally, according to T-Mobile, telephone number (773) 818-5603 is subscribed to "VIRGINIA VAZQUEZ" at 2911 N. Cicero Avenue in Chicago.

⁹ LEOs identified SANCHEZ based on his March 2010 Chicago Police Department arrest photograph.

¹⁰ LEOs identified GONZAGA based on his January 2007 Chicago Police Department arrest photograph.

¹¹ According to records from the Illinois Secretary of State, Subject Vehicle 5 is registered to Brandy Galeana at 6125 S. Talman Avenue, Chicago, Illinois. On or about March 9, 2020, July 2, 2020, and August 14, 2020, Chief Judge Rebecca R. Pallmeyer signed warrants and orders authorizing the installation and monitoring of a tracking device on Subject Vehicle 5.

which was parked behind 6125 S. Talman Avenue, in Chicago. Moments later, Subject Vehicle 5 departed the area.

9. At approximately 11:01 a.m. (call session #253), SANCHEZ, using Target Phone 14, communicated with CHAVEZ, who was using Chavez Phone 1. During the call, SANCHEZ asked, "Hey, who am I going to give the tickets [later determined to be DELVIN WILLIAMS' narcotics proceeds] to?" CHAVEZ asked, "They [JUAN ROSAS-CABRERA] didn't do you the favor with the corners [smaller quantities of narcotics]?" SANCHEZ replied, "He didn't, he didn't want to." CHAVEZ asked, "Well then the mat [material], it's good then, right?" SANCHEZ replied, "Yeah. That's exactly why he didn't want to, bro. That's why he didn't want to." CHAVEZ stated, "Look, you're going to turn that [DELVIN WILLIAMS' narcotics proceeds] in and they [ROSAS-CABRERA] are going to give you another one [unknown quantity of heroin]." SANCHEZ asked, "When?" CHAVEZ replied, "Right now." SANCHEZ asked, "I thought they didn't have any more [heroin], man?" CHAVEZ replied, "They have some. There is a way. We'll see how we are going to do it. Okay?" SANCHEZ stated, "But it's better if...I don't want to hold that [heroin] right now because I'm not going to use it. That's why yesterday, I took it real quick and I was looking for someone to take it." CHAVEZ replied, "Well, then do me the favor, man. For real, I need you to leave a small piece [sample of heroin] over there, over there with, over there it benefits me, you understand? Over there, basically, we will be good."

In total, LEOs monitored the tracking device on Subject Vehicle 5 from approximately July 6, 2020, through approximately September 27, 2020.

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SANCHEZ stated, “Okay uh...fuck. Okay then, okay then I’ll take them [ROSAS-CABRERA] the ticket?” CHAVEZ replied, “Okay, let me call now.” Based on my knowledge of the investigation and my training and experience, as well as the surveillance and calls detailed below, I believe CHAVEZ directed SANCHEZ to pick up narcotics proceeds from WILLIAMS from a previous narcotics transaction and deliver WILLIAMS’ narcotics proceeds to ROSAS-CABRERA.

10. Analysis of call detail records for telephone number (312) 342-6841 (“Subject Phone 48”),¹² believed to be used by JUAN ROSAS-CABRERA (ROSAS)¹³ revealed that at approximately 11:18 a.m., Subject Phone 48 received an incoming telephone call from Mexican telephone number 52-83-1110-7762.

11. Three minutes later, at approximately 11:21 a.m., Subject Phone 47, believed to be used by SANCHEZ, received an incoming phone call from Subject Phone 48, believed to be used by ROSAS. Based on my knowledge of the investigation, my training and experience, the intercepted call summarized above in paragraph 9

¹² On or about July 10, 2020, Chief Judge Rebecca R. Pallmeyer authorized the installation of a pen register and trap and trace device on Subject Phone 48, for a period of 60 days.

¹³ LEOs believe that ROSAS-CABRERA is the user of Subject Phone 48 based on the following: On or about February 24, 2021, LEOs observed JUAN ROSAS-CABRERA exit the residence located at 1235 South 58th Avenue, in Cicero, and enter the front passenger seat of a 2021 blue Chevrolet Equinox. LEOs conducted an investigatory stop on the vehicle and confirmed ROSAS-CABRERA’s identity based on the Mexican driver’s license that he produced during the stop. Additionally, LEOs scanned ROSAS-CABRERA’s fingerprints and confirmed that the fingerprints matched ROSAS-CABRERA’s fingerprints on file in the Automated Biometric Identification System (IDENT). The following day, a Spanish-speaking LEO compared ROSAS-CABRERA’s voice which was recorded by LEOs during their field interview on February 24, 2021, with the user of Subject Phone 48, intercepted on July 8, 2020, at approximately 11:32 a.m. (see call session #268 referenced below in paragraph 22), and determined that the voices match.

(call session #253), and a review of the Subject Phone 48 call detail records, I believe CHAVEZ directed ROSAS to contact SANCHEZ and make arrangements to resupply SANCHEZ with additional resale quantities of heroin in exchange for narcotics proceeds.

12. Analysis of call detail records for Subject Phone 47, believed to be used by SANCHEZ, revealed that on or about July 7, 2020, between 11:41 a.m. and 11:59 a.m., Subject Phone 47 was in contact with Subject Phone 49, believed to be used by WILLIAMS, approximately seven times. Based on my knowledge of the investigation, my training and experience, and the intercepted call summarized above in paragraph 9 (call session #253), I believe SANCHEZ contacted WILLIAMS and made arrangements to pick up narcotics proceeds from WILLIAMS, which SANCHEZ and GONZAGA then delivered to ROSAS, at the direction of CHAVEZ.

1. SANCHEZ and GONZAGA Collect Narcotics Proceeds from Prior Transaction from WILLIAMS

13. At approximately 12:00 p.m., LEOs observed Subject Vehicle 5, driven by SANCHEZ, park behind the residence located at 5210 W. School Street in Chicago.¹⁴ Moments later, LEOs observed WILLIAMS¹⁵ exit the backyard and approach the front passenger door of Subject Vehicle 5. WILLIAMS then handed an unknown object to GONZAGA, who was seated in the front passenger seat, and returned to the backyard of the residence. Based on my knowledge of the

¹⁴ During this investigation, based on surveillance of WILLIAMS and information provided by CD3, LEOs learned that WILLIAMS resides at an address near Laramie Avenue and School Street in Chicago, believed to be 5210 W. School Street.

¹⁵ LEOs identified WILLIAMS based on his State of Illinois driver's license photograph.

investigation, my training and experience, and the intercepted call summarized above, I believe WILLIAMS delivered an unknown quantity of narcotics proceeds to SANCHEZ and GONZAGA.

2. SANCHEZ and GONZAGA Deliver a Sample of Heroin to VAZQUEZ

14. Moments later, Subject Vehicle 5 departed the area. LEOs followed Subject Vehicle 5 to the area of 2917 N. Cicero Avenue in Chicago.

15. At approximately 12:07 p.m., LEOs observed VAZQUEZ¹⁶ walk over to Subject Vehicle 5 and have a brief conversation with SANCHEZ and GONZAGA. After a short time, Subject Vehicle 5 departed the area. Based on my knowledge of the investigation, my training and experience, and the intercepted calls summarized above, I believe SANCHEZ and GONZAGA delivered a sample of heroin to VAZQUEZ.

3. SANCHEZ and GONZAGA Deliver WILLIAMS' Narcotics Proceeds to ROSAS

16. Analysis of call detail records for Subject Phone 47, believed to be used by SANCHEZ, revealed that on or about July 7, 2020, between 12:31 p.m. and 12:50 p.m., Subject Phone 47 was in contact with Subject Phone 48, believed to be used by ROSAS, approximately four times. Based on my knowledge of the investigation, my training and experience, and the intercepted calls summarized below, I believe SANCHEZ contacted ROSAS and made arrangements to deliver the narcotics

¹⁶ LEOs identified VAZQUEZ-PEREZ based on her State of Illinois driver's license photograph.

proceeds that SANCHEZ and GONZAGA had received from WILLIAMS earlier that day around the noon hour, as detailed above in paragraph 13.

17. At approximately 12:47 p.m., LEOs observed Subject Vehicle 5 enter the north/south alley near the intersection of Roosevelt Road and 58th Avenue and park near the garage located behind 1235 S. 58th Avenue.¹⁷ Approximately six minutes later, Subject Vehicle 5 exited the same alley and departed the area. Based on my knowledge of the investigation, my training and experience, the intercepted calls summarized below, and additional surveillance discussed in greater detail below, I believe SANCHEZ and GONZAGA met with ROSAS in the alley behind 1235 S. 58th Avenue to deliver narcotics proceeds (received from WILLIAMS) to ROSAS. Additionally, I believe SANCHEZ and GONZAGA made arrangements with ROSAS to get resupplied with additional heroin the following day.

4. SANCHEZ and CHAVEZ Plan to Distribute Heroin to WILLIAMS and VAZQUEZ the Following Day

18. Analysis of call detail records for Subject Phone 47, believed to be used by SANCHEZ, revealed that on or about July 7, 2020, at approximately 1:20 p.m., SANCHEZ received an incoming call from Subject Phone 49, believed to be used by WILLIAMS. Based on my knowledge of the investigation, my training and

¹⁷ On or about April 21, 2021, ROSAS-CABRERA was arrested for violations of 8 U.S.C. Section 1326 (illegal reentry of previously deported alien) and transported to ICE's Broadview Service and Staging Area (BSSA) facility, in Broadview, where he was interviewed. After being advised of his *Miranda* rights, ROSAS-CABRERA admitted to having previously resided at 1235 S. 58th Avenue in Cicero. Additionally, on or about April 22, 2021, LEOs interviewed the landlord of 1235 S. 58th Avenue in Cicero who advised LEOs that ROSAS-CABRERA has been renting the basement apartment since approximately May of 2020.

experience, and surveillance and intercepted calls detailed below, I believe WILLIAMS contacted SANCHEZ and requested to get fronted with a resale quantity of heroin. Further, I believe SANCHEZ told WILLIAMS that SANCHEZ first needed to get permission from CHAVEZ to front the heroin to WILLIAMS.

19. Immediately following the above call referenced in paragraph 18, at approximately 1:21 p.m. (call session #262), SANCHEZ, who was using Target Phone 14, communicated with CHAVEZ, who was using Chavez Phone 1. During the call:

a. SANCHEZ asked, "Hey, how much time do they [CHAVEZ's unknown narcotics associates] give you to play with that stuff?" CHAVEZ replied, "As long as we need, dude. Whatever we need." SANCHEZ stated, "Ok, ok, so you know what I'm gonna do? I'm gonna take that one that the guy [ROSAS] has and I'm gonna give it to my guy [SANCHEZ's narcotics customer] and give him a week [to sell the heroin]." CHAVEZ replied, "That's fine."

b. SANCHEZ stated, "It's cuz he [SANCHEZ's narcotics customer, believed to be WILLIAMS] just took one bro and he's full, and he's the only one [narcotics customer] that gets that [heroin], bro." CHAVEZ replied, "That's good, but if he is good and he is the way he should be, then throw it at him. Anyways, they give us time to pay for it, so don't trip." SANCHEZ replied, "Okay, then that's what I'm gonna do, bro."

c. CHAVEZ asked, "Okay, so then you're gonna give the corner [250 grams of heroin] to Vica [VAZQUEZ] or you're gonna give her a half [500 grams]?" SANCHEZ replied, "No, I'm just gonna give her the corner." CHAVEZ stated, "It's

done, perfect. That's good." SANCHEZ stated, "Hey, but I'm not gonna do it until tomorrow." CHAVEZ replied, "Well, I've had her waiting since yesterday." SANCHEZ stated, "Or tell her to go pick it up [from ROSAS]. She's right there in Cicero. The guy is like really close to her, bro. It's further for me and I have to make more turns."

d. CHAVEZ asked, "But aren't you going to pick it up complete, no?" SANCHEZ replied, "I'm going to pick it up complete and I'll leave it there. I'm going to leave it right there real close." CHAVEZ stated, "Okay, it's fine. Just leave it there for her and that's it." SANCHEZ replied, "Okay. For tomorrow, so you can tell her." CHAVEZ stated, "No, but try and do it today." SANCHEZ replied, "Dude, I can't. I left and the black guy [WILLIAMS] left, bro. I have to wait for him to get back." CHAVEZ asked, "So you ended up leaving it [the heroin with ROSAS]?" SANCHEZ replied, "Hell yeah, dude. I'm not gonna bring that [heroin] back home with me especially after what happened to me in March.¹⁸ Fuck that."

e. CHAVEZ stated, "Hopefully they don't fucken' get rid of it [sell the heroin] by tomorrow." SANCHEZ replied, "Tell him [ROSAS], yes. Call him and tell him I will pick it up tomorrow morning."

f. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ told CHAVEZ that he intended to pick up heroin from ROSAS. Additionally, I believe SANCHEZ told CHAVEZ that SANCHEZ would,

¹⁸ On or about March 31, 2020, LEOs conducted a traffic stop of Subject Vehicle 5, driven by SANCHEZ, as he approached his residence located at 6125 S. Talman Avenue in Chicago. During the traffic stop, SANCHEZ provided LEOs with consent to search Subject Vehicle 5. LEOs searched the vehicle for contraband, with negative results.

at the direction of CHAVEZ, deliver a smaller portion ("corner") of the heroin to VAZQUEZ and would front the rest of the heroin to WILLIAMS.

B. On July 8, 2020, SANCHEZ and GONZAGA Pick Up Narcotics from ROSAS, at CHAVEZ's Direction, and Distribute it to WILLIAMS and VAZQUEZ

1. SANCHEZ Finalizes the Details of the Transaction with ROSAS and CHAVEZ

20. The following morning, on or about July 8, 2020, at approximately 11:26 a.m. (call session #264), SANCHEZ, using Target Phone 14, attempted to communicate with CHAVEZ, who was using Chavez Phone 1, and the call went unanswered. While the phone rang, SANCHEZ spoke in the background to an unknown individual and stated, "Because we are going to give all that to the black guy [WILLIAMS]. We'll give it all to him." The unknown individual's response was unintelligible. SANCHEZ replied, "But we will have to see how much time we have."¹⁹

21. At approximately 11:29 a.m. (call session #266), SANCHEZ, who was using Target Phone 14, communicated with CHAVEZ, who was using Chavez Phone 1. During the call, SANCHEZ and CHAVEZ discussed the details of the upcoming transaction:

a. SANCHEZ asked, "Hey is that going happen?" CHAVEZ replied, "Yes." SANCHEZ stated, "Okay look, the guy, this guy, right...that thing [kilogram of heroin] comes in five pieces, right?" CHAVEZ asked, "How?" SANCHEZ stated,

¹⁹ Based on law enforcement's observations prior to the seizure of heroin referenced in paragraph 41 and footnote 20, my knowledge of the investigation and my training and experience, I believe GALEANA-GONZAGA was the individual in the background that SANCHEZ was speaking to during this call.

"It's five pieces, bro. They are small, the package." CHAVEZ replied, "Okay." SANCHEZ stated, "Okay, so from those five pieces I have to give..." CHAVEZ interrupted, "They came separated?" SANCHEZ replied, "Yes, bro. It all came separated already." CHAVEZ asked, "Wait, it didn't come like, like..." SANCHEZ interrupted, "No. It's not one piece, bro. It's not one piece, it's like a small pastry. Like five small pastries. That's how that shit came." CHAVEZ replied, "Okay." SANCHEZ stated, "And then I have to give him...well, I don't know how much each piece weighs and I don't have a calculator [scale], and I don't know if this guy is gonna have a calculator either, bro." CHAVEZ replied, "I would imagine he does." SANCHEZ stated, "Let me ask him then if he can adjust it for me and to give me the 250 [grams] separately and the rest I'm gonna give it to my guy [WILLIAMS] and..."

b. CHAVEZ stated, "Look, if there are five pieces...look, I'm going to do the math for you...so then what are the pieces broken down by, two [200 grams]?" SANCHEZ replied, "Two, four, six, eight, nine and ten. Yes, so then he should give me two and half [pieces of heroin]? Then it would be two...no, no, no, wait...yes two and a half would come out to 250 [grams], right?" CHAVEZ acknowledged, and SANCHEZ stated, "Oh no, one and a half [pieces of heroin] would make 250 [grams]."

c. CHAVEZ asked, "But wait, weren't you going to take it all?" SANCHEZ replied, "Yes, I'm gonna take it all, yes. And whatever is left over, I'm gonna give it to that black guy [WILLIAMS] and I am going to give him time [front the heroin]." CHAVEZ stated, "Okay, call that guy [ROSAS] and get in agreement." SANCHEZ replied, "Okay, bro. I'm going to call him [ROSAS] now."

d. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ told CHAVEZ that the kilogram of heroin that ROSAS was in possession of had already been broken down into five separate pieces. Further, I believe CHAVEZ directed SANCHEZ to contact ROSAS and arrange to have ROSAS repack 250 grams of heroin that SANCHEZ could deliver to VAZQUEZ, on behalf of CHAVEZ.

22. At approximately 11:32 a.m. (call session #268), SANCHEZ, who was using Target Phone 14, communicated with ROSAS, who was using Subject Phone 48. During the call, SANCHEZ and ROSAS discussed the 250 grams of heroin SANCHEZ was going to pick up:

a. SANCHEZ asked, "What's up? I'm the guy from yesterday that went back to take the piece [sample of heroin]. The one that gave you the tickets [narcotics proceeds]." ROSAS replied, "Yeah, okay." SANCHEZ stated, "Okay. I'm going to pass [drive over to ROSAS's location] for that [additional heroin]. I spoke with the guys [CHAVEZ] and made arrangements, but they asked me if you can put 250 [grams of heroin] on the side, which is one of those and half of the other [one and a half heroin pieces]."

b. ROSAS stated, "Let me see. I'm telling you because the guy just left it [packaged heroin] for me like that, and I didn't realize what I had. I just grabbed it and took it like that and stored it. I don't know the fractions [amounts] I have." SANCHEZ replied, "Yes. They each have 200 [grams] each." ROSAS replied, "Oh, okay." SANCHEZ stated, "What's happening is they told me to give 250 to a person

[VAZQUEZ]²⁰ near you and I don't have a calculator [scale] in my car and the person I'm dropping it off to doesn't have one either. Because I'm just going to stop by quick and they told me to ask you if you can just put the 250 on the side and I said, 'I'll ask,' and they said, 'He should have one.' That's why I'm asking you."

c. ROSAS confirmed, "250, right?" SANCHEZ replied, "Yes. Just 250, which comes out to one of those small packages...a whole one. And to one, you take out 50 [grams], that's it, and you can put that on the side for me, but I'm taking it all, the whole thing [kilo of heroin]." ROSAS replied, "Oh, yes. I understand." SANCHEZ stated, "I can be there like in 45 [minutes]?" ROSAS replied, "Oh okay. Let me see because I believe there isn't anything to help measure [weigh] it with but let me figure it out. I will let you know like in 15 minutes." SANCHEZ replied, "Oh, okay, that's done." ROSAS stated, "I will call you in 15 minutes." SANCHEZ replied, "15, okay." ROSAS stated, "I'll let you know what time I will be there [at 1235 S. 58th Avenue in Cicero, IL]²¹ because I'm not there. I'm working a bit." SANCHEZ replied, "Oh, okay. Just call me." ROSAS replied, "Okay. I'll call you like in 15 minutes."

d. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ contacted ROSAS and arranged to pick up several

²⁰ As described in greater detail below in paragraph 41, on or about July 8, 2020, at approximately 3:18 p.m., LEOs seized approximately 283.55 grams of heroin from VAZQUEZ-PEREZ during a traffic stop after LEOs observed GALEANA-GONZAGA place the heroin inside VAZQUEZ-PEREZ's unoccupied vehicle.

²¹ As described in greater detail below in paragraph 29, prior to the seizure of heroin referenced in paragraph 41 and footnote 20, LEOs followed SANCHEZ to an alley located behind 1235 S. 58th Avenue in Cicero and observed SANCHEZ meet with ROSAS-CABRERA.

packages of heroin, which SANCHEZ then delivered to VAZQUEZ and WILLIAMS's girlfriend, Individual A.

23. At approximately 12:42 p.m. (call session #271), SANCHEZ, who was using Target Phone 14, communicated with ROSAS, who was using Subject Phone 48. During the call, ROSAS stated, "Look, I asked the guy and there is no scale." SANCHEZ asked, "You don't have something to weigh it with?" ROSAS replied, "No and since I'm at home and there is family there, I really can't do much, and the guy told me not to do anything [illegal activity] because they will kick us out." SANCHEZ replied, "Okay." ROSAS stated, "Uh-huh, and they told me that they weigh like 283 [grams], or something like that. They said, why don't you give them a piece and it's like 30 more...so that you don't have to be..." SANCHEZ interrupted, "It's okay. I'll take it like that, fuck it. Let's see if they go for it. Okay, so 283 for each piece, right?" ROSAS replied, "Yes...okay, like what time?" SANCHEZ stated, "Like in 45 [minutes]." Based on my knowledge of the investigation and my training and experience, I believe ROSAS told SANCHEZ that he did not have a scale to repackage exactly 250 grams of heroin as SANCHEZ had previously requested. Further, I believe SANCHEZ agreed to take the package of heroin, which according to ROSAS weighed 283 grams, and deliver it to VAZQUEZ.

2. SANCHEZ Agrees to Front Approximately 750 Grams of Heroin to WILLIAMS

24. At approximately 12:43 p.m. (call session #272), SANCHEZ, who was using Target Phone 14, communicated with WILLIAMS, who was using Subject Phone 49. During the call:

a. SANCHEZ stated, "Hey. They're gonna...what I recently gave you [sample of heroin], right?" WILLIAMS replied, "Yeah." SANCHEZ stated, "I'm going to go take like 800 points [grams] away from somebody [ROSAS] and I'm going to give them to you and then they're gonna give us time with it [front the narcotics]." WILLIAMS replied, "Alright."

b. SANCHEZ stated, "Yeah. They're going to give us time with it, so then you can keep it because apparently the other guy...it's gonna take a longer time than we...than what I can take, so they don't want that, you know? They want to come back again, pretty soon. They want to make a second trip [delivery of narcotics to Chicago]. The guy already left, so they want to make sure that we at least have the paper [narcotics proceeds] by the time he gets back over here, so I'm like, yeah."

c. WILLIAMS replied, "Okay, I got you. I'll get out there with it [sell the heroin that SANCHEZ provides]." SANCHEZ asked, "Okay. Where you at?" WILLIAMS replied, "Actually, I finna go to Home Depot, and all that type of shit, but..." SANCHEZ interrupted, "Cause I'm picking this up in 45 minutes [from ROSAS]. I gotta go grab it right there by...on Central and the 290." WILLIAMS replied, "Alright. Well, you might have to go see my girl [Individual A]. I can tell her to be at home for you. You know?" SANCHEZ asked, "On the northside?" WILLIAMS replied, "No, other one [location]." SANCHEZ asked, "Um, School [Street], or over here on the fucking...hotdog place?" WILLIAMS replied, "Yeah." SANCHEZ stated,

"Alright. 45 minutes at the hotdog place [4509 Forest Avenue in Brookfield]." ²²

WILLIAMS replied, "Alright." SANCHEZ replied, "Alright, bye."

d. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ contacted WILLIAMS and made arrangements to deliver the rest of the heroin to WILLIAMS' girlfriend, after setting aside approximately 280 grams of heroin for VAZQUEZ.

25. At approximately 12:45 p.m. (call session #274), SANCHEZ, who was using Target Phone 14, communicated with CHAVEZ, who was using Chavez Phone 1. During the call, SANCHEZ reported back the information from ROSAS and WILLIAMS:

a. SANCHEZ asked, "He [ROSAS] can't break it, so he told me to take a little package just like that and to take that and to give him that. Every packet is 280 [grams]." CHAVEZ replied, "Okay." SANCHEZ asked, "So I'm gonna give her [VAZQUEZ] that, okay?"

b. CHAVEZ replied, "Okay, wait, wait. I don't understand. You're just going to take one package, or everything?" SANCHEZ stated, "No. I'm going to take everything and whatever is left from the complete piece, I'm gonna take that.

²² As described in greater detail below in paragraph 32, prior to the seizure of heroin referenced in paragraph 41 and footnote 20, LEOs followed Subject Vehicle 5, driven by SANCHEZ, to the multi-unit apartment building located at 4509 Forest Avenue in Brookfield. At approximately 1:54 p.m. (call session #288), SANCHEZ placed an outgoing call on Target Phone 14 to WILLIAMS who was using Subject Phone 49. During the conversation, SANCHEZ asked, "Hey. I'm pulling up...you want me to walk it [heroin] in?" WILLIAMS replied, "Yeah. Through the front." Moments later, LEOs observed SANCHEZ walk into the apartment building at 4509 Forest Avenue. LEOs identified SANCHEZ based on his March 2010 Chicago Police Department arrest photograph.

So, I'm... for your girl, I'm going to give...from the entire piece, I'm only going to give her 280. And whatever is left over, I'm going to give it to my people [WILLIAMS]."

c. CHAVEZ replied, "Okay." SANCHEZ stated, "So on the 1000 [grams] take off 280, so what would that be? 1000, 200 that's 800 minus 80. 800, 8, 9, 10, that's 720. It's 720 [grams]." CHAVEZ replied, "Okay, you run with it because I'm not understanding." SANCHEZ replied, "Yeah, it would be 720 for me, 280 for your girl. That's it." CHAVEZ stated, "Don't say my girl, she's not my girl." SANCHEZ replied, "I mean I can't, I'm used to...okay, what am I gonna say, bro? Okay, Vica, Vica, Vica, Vica."

d. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ told CHAVEZ that SANCHEZ would deliver approximately 280 grams of heroin to VAZQUEZ ("Vica"), and would front the remaining quantity of heroin, which SANCHEZ estimated to be 720 grams, to WILLIAMS.

3. SANCHEZ and GONZAGA Pick Up Approximately One Kilo of Heroin from ROSAS

26. At approximately 1:01 p.m., LEOs observed SANCHEZ and GONZAGA exit the residence located at 6125 S. Talman Avenue, in Chicago, and enter Subject Vehicle 5. Moments later, Subject Vehicle 5 departed the area.

27. At approximately 1:13 p.m. (call session #277), SANCHEZ, who was using Target Phone 14, communicated with ROSAS, who was using Subject Phone 48. During the call, ROSAS asked, "How long are you going to be, cousin?" SANCHEZ replied, "Like in 15 [minutes]. I'll be there." ROSAS stated, "Oh okay, I was gonna go

on break.” SANCHEZ replied, “I’m here on 55 and barely getting close to Cicero.” ROSAS stated, “Oh okay... call me when you’re here.”

28. Between 1:25 p.m. and 1:29 p.m. (call sessions #278, #280 and #282), SANCHEZ, who was using Target Phone 14, exchanged text messages with ROSAS, who was using Subject Phone 48. During the conversation, SANCHEZ texted “5-7 min.” ROSAS replied, “Ok.” SANCHEZ then texted, “I’m here.”

29. At approximately 1:30 p.m., LEOs followed Subject Vehicle 5, driven by SANCHEZ, to Cicero where LEOs observed Subject Vehicle 5 enter the north/south alley near the intersection of Roosevelt Road and 58th Avenue. Moments later, LEOs observed SANCHEZ position Subject Vehicle 5 next to the garage located behind 1235 S. 58th Avenue. A short time later, LEOs observed ROSAS²³ approach Subject Vehicle 5 carrying a red object. LEOs watched ROSAS hand the red object to SANCHEZ through the driver’s side window and then walk away, at which time Subject Vehicle 5 departed the area. Based on my knowledge of the investigation, my training and experience, the intercepted calls summarized above, the review of the recorded surveillance video, and the subsequent seizure of heroin from VAZQUEZ (described below in paragraph 41), I believe ROSAS supplied SANCHEZ with several packages of heroin totaling approximately 1000 grams.

²³ One of the LEOs who participated in the investigatory stop of ROSAS on or about February 24, 2021, as detailed in footnote 13, identified ROSAS based on a review of the surveillance video taken during the meeting between SANCHEZ and ROSAS in the alley behind 1235 S. 58th Avenue in Cicero.

4. SANCHEZ and GONZAGA Deliver Part of the Heroin to WILLIAMS (through Individual A)

30. At approximately 1:35 p.m. (call session #284), SANCHEZ, who was using Target Phone 14, sent a text message to WILLIAMS, who was using Subject Phone 49. The text message read, "15 min."

31. At approximately 1:54 p.m. (call session #288), SANCHEZ, who was using Target Phone 14, communicated with WILLIAMS, who was using Subject Phone 49. During the call, SANCHEZ asked, "Hey, I'm pulling up...you want me to walk it [heroin] in?" WILLIAMS replied, "Yeah. Through the front." SANCHEZ asked, "Okay. Is the door locked?" WILLIAMS replied, "No, you can go right in, but my girl [Individual A] is up there." SANCHEZ asked, "Your girl is there?" WILLIAMS replied, "You know the building...yeah, yeah." SANCHEZ stated, "Okay...the front door, alright...is it like a complex?" WILLIAMS replied, "Yeah, but she ...naw, there's only one way in and she's going to be there." SANCHEZ stated, "Alright. Yeah, tell her to meet me at the door. I'm like one block away. I'm pulling...I'm about to pull up."

32. At approximately 1:57 p.m., LEOs observed Subject Vehicle 5 arrive and park in front of the apartment building located at 4509 Forest Avenue (the "Forest Avenue apartment building"), in Brookfield, Illinois. LEOs observed SANCHEZ exit Subject Vehicle 5 and walk into the apartment building. Moments later, LEOs observed SANCHEZ exit the building, enter Subject Vehicle 5, and depart the area. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ delivered approximately 720 grams of the heroin that he received from

ROSAS to WILLIAMS' girlfriend, Individual A, inside the Forest Avenue apartment building.

33. At approximately 1:58 p.m. (call session #290), SANCHEZ, who was using Target Phone 14, communicated with WILLIAMS, who was using Subject Phone 49. During the call, WILLIAMS asked, "Yeah, you there?" SANCHEZ replied, "Yeah, I seen her already." WILLIAMS stated, "Alright, okay." Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ confirmed with WILLIAMS that SANCHEZ had just delivered heroin to Individual A, at the Forest Avenue apartment building.

5. SANCHEZ and GONZAGA Deliver the Remainder of the Heroin to VAZQUEZ

34. At approximately 2:02 p.m. (call session #296), SANCHEZ, who was using Target Phone 14, communicated with VAZQUEZ, who was using Vazquez Phone 1. During the call, SANCHEZ stated, "Hey, hey, I'm on my way to see you." VAZQUEZ asked, "Like right now, right now?" SANCHEZ replied, "Like in about, maybe like in 40 minutes, or 30." VAZQUEZ stated, "Okay cool, alright." SANCHEZ replied, "Alright, bring your purse." VAZQUEZ replied, "Okay."

35. Over the next several minutes, between 2:04 p.m. and 2:05 p.m. (call sessions #297, #299, #301, #303, 307, #309 and #311), SANCHEZ, who was using Target Phone 14, exchanged text messages with VAZQUEZ, who was using Vazquez Phone 1. During the call, VAZQUEZ asked, "Can I just unlock my car it's in the front [of VAZQUEZ's workplace]?" SANCHEZ replied, "Ok that's fine." VAZQUEZ stated, "Let me know when u here." SANCHEZ asked, "What car is it Nissan??" VAZQUEZ

replied, "Yes." SANCHEZ texted, "K." Based on surveillance detailed below, my knowledge of the investigation and my training and experience, I believe VAZQUEZ directed SANCHEZ to place the heroin inside her unlocked Nissan Altima, which was parked near the front of VAZQUEZ's workplace.²⁴

36. At approximately 2:46 p.m., LEOs followed Subject Vehicle 5 to the area of 2900 N. Cicero Avenue, in Chicago. Several minutes later, LEOs observed GONZAGA walk away from Subject Vehicle 5, approach a blue Nissan Altima bearing Illinois license plate P31 5718,²⁵ and enter the Nissan.

37. At approximately 2:48 p.m. (call session #314), SANCHEZ, who was using Target Phone 14, communicated with GONZAGA, who was using telephone number (708) 307-3574 ("Gonzaga Phone 1").²⁶ During the call, SANCHEZ stated, "It's behind, what the fuck do you call it, a white truck." GONZAGA replied, "Yes, I'm

²⁴ According to the Illinois Secretary of State databases, during the 2020 filing year, VAZQUEZ-PEREZ was listed as both an agent and manager at Business A, located at the approximate location of 2911 N. Cicero Avenue in Chicago.

²⁵ According to the Illinois Secretary of State databases, the blue Nissan Altima is registered to "Virginia Vazquez" at 1843 S. Lombard Avenue in Cicero, Illinois.

²⁶ LEOs believe that GONZAGA is the user of Gonzaga Phone 1 based on the following: As referenced above, on or about July 8, 2020, LEOs observed GONZAGA, who was positively identified based on GONZAGA's January 2007 Chicago Police Department arrest photograph, walk away from Subject Vehicle 5 and enter VAZQUEZ's Nissan Altima. As described above in paragraph 37, while inside the vehicle, GONZAGA utilized Gonzaga Phone 1 to call SANCHEZ on Target Phone 14 and ask SANCHEZ whether he [GONZAGA] "should leave it [the heroin] under the mat." Moments later, LEOs observed GONZAGA exit the Nissan and return to Subject Vehicle 5, driven by SANCHEZ. LEOs later seized approximately 283.55 grams of heroin from under the front passenger floor mat of VAZQUEZ's Nissan Altima during a traffic stop. Additionally, on or about July 17, 2020, LEOs interviewed GONZAGA following his arrest for violations of the Immigration Nationality Act. A LEO who took part in the interview of GONZAGA, has listened to call session #314 and determined that GONZAGA's voice is the user of telephone number Gonzaga Phone 1.

already in the car.” SANCHEZ stated, “Oh okay. Look, I’m gonna turn [Subject Vehicle 5] to go over there, wait for me around there. If you want, start walking. Cross the...” GONZAGA interrupted, “Where should I leave it [the heroin]? Under the mat?” SANCHEZ replied, “Yes bro, wherever around there.” GONZAGA asked, “Okay, which way should I go?” SANCHEZ replied, “Uh, go...it’s because I don’t want you to go to that little street because it’s really empty and those dogs [law enforcement] are still around here. I just ran into another one of those guys [law enforcement].” Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ was conducting counter-surveillance while waiting for GONZAGA to finish hiding the heroin inside VAZQUEZ’s Nissan Altima and return to Subject Vehicle 5.

38. Approximately one minute later at 2:49 p.m., LEOs observed GONZAGA exit the blue Nissan and enter Subject Vehicle 5. Moments later, LEOs watched Subject Vehicle 5 depart the area.

39. At approximately 2:50 p.m. (call session #315), SANCHEZ, who was using Target Phone 14, sent a text message to VAZQUEZ who was using Vazquez Phone 1. The text message read, “Lock it [the Nissan]”.

40. At approximately 2:52 p.m. (call session #317), SANCHEZ, who was using Target Phone 14, communicated with VAZQUEZ, who was using Vazquez Phone 1. During the call, SANCHEZ communicated his concerns about law enforcement in the area during the transaction:

a. SANCHEZ asked, "Hey, how well do you trust the person who's gonna help you file the paperwork [sell the heroin]?" VAZQUEZ replied, "Oh, they're good. They've been doing..." SANCHEZ interrupted, "100 percent?" VAZQUEZ replied, "Yeah, yeah." SANCHEZ stated, "Okay, because right now, it was really bad getting here, and it was weird. Very, very weird, like something weird, like not normal."

b. VAZQUEZ asked, "What do you mean?" SANCHEZ replied, "Well, there's a lot of people that are not supposed to be around there, like ugly [law enforcement]." VAZQUEZ asked, "By over here?" SANCHEZ replied, "Yeah, your whole...everything, like all around there. I couldn't make a turn somewhere because there was someone [law enforcement] there. I was like, what the fuck, like what the fuck is going on like...and it's like just around your area. I don't know, that's why. I don't know if you have the person [VAZQUEZ's unknown narcotics customer] sitting there waiting nearby."

c. VAZQUEZ replied, "No, I do not...no, she's working right now, so she didn't even know I was filing that [getting resupplied with heroin] today so." SANCHEZ replied, "Okay...the measurements for it, it's like 280 [grams], around there. It didn't measure the 250, it's like 280, just so you're aware of it." VAZQUEZ replied, "Oh, okay." SANCHEZ stated, "It's because they couldn't do the uh, they couldn't cut it in that size, so..." VAZQUEZ replied, "Oh okay, cool." SANCHEZ stated, "They have to. We have to cover the, the, that [additional 30 grams], okay?" VAZQUEZ replied, "Yeah okay, not a problem."

d. SANCHEZ stated, "Okay, it's [the heroin] under the mat." VAZQUEZ replied, "Okay." SANCHEZ stated, "Just clean it up, alright?" VAZQUEZ replied, "Okay, perfect. Thank you, bye."

e. Based on my knowledge of the investigation and my training and experience, I believe SANCHEZ warned VAZQUEZ that law enforcement was in the area. Additionally, I believe SANCHEZ told VAZQUEZ that GONZAGA had placed approximately 280 grams of heroin under the floor mat inside VAZQUEZ's Nissan Altima.

C. Seizure of Narcotics from VAZQUEZ

41. Later that same day, at approximately 3:18 p.m., LEOs performed a traffic stop of VAZQUEZ²⁷ in her Nissan Altima for failure to use a turn signal near the approximate address of 5401 W. Cornelia Avenue in Chicago. During the stop, VAZQUEZ was unable to produce valid proof of insurance, at which time she was asked to exit her vehicle. After VAZQUEZ had exited the vehicle, LEOs performed a limited search of the Nissan based on probable cause that it contained evidence of the narcotics transaction conducted earlier that day. During the search, LEOs seized a white knotted plastic bag from under the front passenger floor mat of the Nissan. Inside the plastic bag, LEOs observed a pressed tan powdery substance, wrapped in black electrical tape. According to the U.S. Customs and Border Protection Laboratory, the pressed tan powdery substance weighed approximately 283.55 grams

²⁷ LEOs confirmed VAZQUEZ's identity based on her State of Illinois driver's license which she produced during the traffic stop.

and contained heroin. Additionally, two latent prints found on the plastic bag were identified as belonging to GONZAGA.

42. Based on my training and experience, the quantity of narcotics recovered is not a user quantity of narcotics, but rather indicates that the individual in possession of the narcotics intended to distribute the narcotics.

D. On or About July 17, 2020, LEOs Seize \$7,000 in Narcotics Proceeds from SANCHEZ and GONZAGA

43. On or about July 17, 2020, at approximately 11:55 a.m., while conducting surveillance on the Forest Avenue apartment building, LEOs observed SANCHEZ (driver) and GONZAGA (passenger)²⁸ arrive in a black Honda sedan bearing Illinois license plate Y80 4328,²⁹ exit the Honda, and meet with WILLIAMS outside the Forest Avenue apartment building. Prior to SANCHEZ and GONZAGA's departure, LEOs observed WILLIAMS open the front passenger-side door of SANCHEZ's vehicle and place an object into the unoccupied vehicle. After a brief time, SANCHEZ and GONZAGA re-entered the Honda and departed the scene, and LEOs initiated mobile surveillance on the Honda. Based upon a prior review of records from the Illinois Secretary of State, LEOs were aware that SANCHEZ was operating the Honda while his driver's license was revoked. Based on this information, LEOs executed a traffic stop of the Honda at the approximate location of the intersection of California Avenue and 47th Street, in Chicago. During the traffic stop, LEOs seized approximately \$7,000 in U.S. currency, rubber-banded in a manner

consistent with narcotics trafficking, which was found on GONZAGA's person. Based on my knowledge of the investigation and my training and experience, I believe the U.S. currency was partial narcotics proceeds related to the approximate 720 grams of heroin that SANCHEZ had fronted to WILLIAMS on or about July 8, 2020. Additionally, I believe WILLIAMS had stored the suspected narcotics proceeds inside an apartment that WILLIAMS utilized at the Forest Avenue apartment building, prior to SANCHEZ and GONZAGA's arrival.

44. Following the traffic stop, SANCHEZ and GONZAGA were taken into custody and transported to CPD's Homan Square facility where they were advised of their *Miranda* rights and interviewed. Following the interview, SANCHEZ and GONZAGA were arrested by ICE Officers for violations of the Immigration Nationality Act. On or about August 20, 2020, SANCHEZ was released on an order of supervision pending the outcome of his immigration proceedings. On or about September 11, 2020, GONZAGA was removed from the United States to Mexico.

II. CS4 PURCHASES CRACK COCAINE FROM WILLIAMS AND LEOs RECOVER CRACK COCAINE FROM WILLIAMS' HOME

45. On or about November 1, 2020, LEOs met with a confidential source ("CS4")³⁰ who provided LEOs with information regarding a male narcotics supplier known to CS4 as "D," whom LEOs and CS4 have identified as WILLIAMS:

³⁰ CS4 began cooperating in this investigation on or about October 31, 2020, after LEOs observed CS4 engage in a suspected narcotics transaction with WILLIAMS in a parking lot in Chicago. Following the suspected narcotics transaction, LEOs conducted a traffic stop on the vehicle driven by CS4 and recovered approximately .5 grams of suspect crack cocaine hidden on CS4's person. CS4 has not been charged criminally for possession of this suspect crack cocaine. CS4 has no other known arrests and has no known convictions. CS4 is cooperating in this investigation in exchange for monetary consideration. To date, CS4 has

a. A friend introduced CS4 to D approximately three months prior, and CS4 began purchasing crack cocaine from D at that time. CS4's friend provided CS4 with D's telephone number and explained to CS4 that D sold crack cocaine in \$50, \$100 and \$200 increments.

b. CS4 has purchased crack cocaine from D about once every two weeks over the past three months leading up to November 1, 2020.³¹ CS4 contacts D on telephone number (708) 657-7319 ("Williams Phone 2"), which is the same phone number provided to CS4 by CS4's friend, and either meets D inside the Forest Avenue apartment building or in an alley near the intersection of 15th Avenue and Bataan Drive in Broadview.

c. CS4 estimated that prior to November 1, 2020, CS4 had purchased crack cocaine from an apartment within the Forest Avenue apartment building on about four separate occasions. After arriving at the Forest Avenue apartment building, CS4 would enter the rear door of the apartment building and usually meet with D in the hallway after observing D exit an apartment at the top of a staircase inside the apartment building.

been paid approximately \$200 for CS4's cooperation. No promises have been made regarding any other potential benefits that CS4 may receive for CS4's cooperation. Since CS4's cooperation began, CS4 has provided LEOs with background and intelligence information regarding this investigation. Law enforcement has independently corroborated this information through controlled buys, physical surveillance, recorded conversations, and information received from other confidential sources.

³¹ CS4 stated that CS4 has purchased \$50 worth of crack cocaine from D every time except once, when CS4 purchased \$100 worth of crack cocaine.

d. During a recent time CS4 purchased narcotics from D, CS4 ascended a staircase inside the apartment building, and approached the front door to an apartment, which was ajar, where CS4 was greeted by a woman known to CS4 as “Jess.”³² CS4 stated that D was in his underwear and standing behind “Jess” inside the apartment, and directed “Jess” to conduct the narcotics transaction with CS4.

A. On or About November 3, 2020, WILLIAMS Sells Cocaine Base to CS4 Inside Apartment 1N of the Forest Avenue Apartment Building

46. On or about November 3, 2020, LEOs met with CS4 and directed CS4 to make a controlled purchase of narcotics from WILLIAMS inside the Forest Avenue apartment building. On that day, at approximately 10:09 a.m., CS4 had a consensually-recorded conversation with WILLIAMS,³³ who was using Williams Phone 2. During the call, CS4 asked, “Hey, you home?” WILLIAMS replied, “Yeah.” CS4 asked, “Can I slide by [purchase crack cocaine]?” WILLIAMS replied, “Okay.” CS4 asked, “Okay, can I...I’m gonna get a fifty [\$50 bag of crack cocaine].” WILLIAMS asked, “Five-O?” CS4 confirmed, “Five-O...alright.”

47. At the conclusion of the call with CS4, LEOs searched CS4 and CS4’s vehicle for contraband, with negative results. CS4 was then equipped with an audio/video recording device and provided with \$100 in government funds to purchase

³² According to CS4, D told CS4 that “Jess” is D’s girlfriend. CS4 was shown a State of Illinois driver’s license photo of Individual A and positively identified Individual A as “Jess.”

³³ CS4 identified the individual using Williams Phone 2 as “D,” who CS4 previously identified as WILLIAMS. CS4 is familiar with WILLIAMS’s voice based on previous phone calls and in-person meetings with WILLIAMS.

crack cocaine from WILLIAMS. LEOs activated the recording device and followed CS4 to the Forest Avenue apartment building.

48. At approximately 10:26 a.m., LEOs observed CS4 park and exit CS4's vehicle. After exiting the vehicle, CS4 had a consensually-recorded conversation with WILLIAMS, who was using Williams Phone 2. During the call, CS4 stated, "Hey. I'm at the back." WILLIAMS replied, "Okay." CS4 stated, "Alright, bye."

49. Moments later, using a pole camera behind the Forest Avenue apartment building, LEOs observed CS4 enter the Forest Avenue apartment building. According to CS4 and the audio/video recording, after entering the apartment building, CS4 met with WILLIAMS in the hallway of the apartment building at the bottom of the staircase that leads to Apartment 1N. WILLIAMS distributed a small clear knotted baggie from WILLIAMS in exchange for \$50. WILLIAMS asked CS4, "Y'all good?" CS4 replied, "Oh yeah...you know what? Let me get another fifty." WILLIAMS then invited CS4 inside Apartment 1N. CS4 and WILLIAMS walked up a half flight of stairs within the apartment building and entered Apartment 1N.

50. While inside Apartment 1N, CS4 waited in the kitchen while WILLIAMS walked down a hallway and entered a room out of CS4's view. While WILLIAMS was inside the room, CS4 could hear a noise that CS4 described as a "cutting" sound.³⁴ Less than two minutes later, WILLIAMS returned to the kitchen

³⁴ Based on the recorded phone call that CS4 placed to WILLIAMS earlier that morning, I believe that prior to CS4's arrival at the Forest Avenue apartment building, WILLIAMS had only prepared \$50 worth of crack cocaine for CS4. Based on my knowledge of the investigation

and distributed a second small clear knotted baggie to CS4 in exchange for an additional \$50. CS4 then exited Apartment 1N.

51. At approximately 10:29 a.m., using a pole camera, LEOs observed CS4 exit the Forest Avenue apartment building, enter CS4's vehicle, and depart the area. LEOs followed CS4 to a predetermined location where LEOs met with CS4 and recovered two clear knotted baggies, each containing a white rock-like substance. According to the Illinois State Police Forensic Laboratory, the contents of the baggies weighed a total of approximately .7 grams and tested positive for cocaine base.

B. On or About November 8, 2020, WILLIAMS Sells Cocaine Base to CS4 Outside Apartment 1N of the Forest Avenue Apartment Building

52. On or about November 8, 2020, LEOs met with CS4 and directed CS4 to make another controlled purchase of narcotics from WILLIAMS inside the Forest Avenue apartment building. On that day, at approximately 10:47 a.m., LEOs searched CS4 and CS4's vehicle for contraband, with negative results.

53. At approximately 10:55 a.m., CS4 had a consensually-recorded conversation with WILLIAMS, who was using Williams Phone 2. During the call, CS4 asked, "You around?" WILLIAMS replied, "Yeah." CS4 asked, "Can I get a hundo [\$100 bag of crack cocaine]." WILLIAMS replied, "Alright." CS4 stated, "Alright. I'll be on my way." WILLIAMS replied, "Alright."

and my training and experience, I believe the "cutting" sound that CS4 heard inside Apartment 1N was WILLIAMS preparing an additional \$50 worth of crack cocaine, at CS4's request. Based on my training and experience, I know that crack cocaine, which is a rock-like substance, often needs to be broken or "cut" from a larger piece of "rock" to supply purchasers with user quantities.

54. At the conclusion of the meeting with CS4, CS4 was equipped with an audio/video recording device and provided with \$100 in government funds to purchase crack cocaine from WILLIAMS. LEOs activated the recording device and an undercover officer ("UCO") drove CS4 to the Forest Avenue apartment building in an undercover vehicle ("UCV").

55. At approximately 11:05 a.m., CS4 exited the UCV and walked towards the Forest Avenue apartment building. At approximately the same time, 11:05 a.m., CS4 had a conversation with WILLIAMS, who was using Williams Phone 2.³⁵ During the call, CS4 stated, "Hey, I'm in the back...Huh...Come to the door? Okay."

56. Moments later, using a pole camera, LEOs observed CS4 enter the Forest Avenue apartment building. According to CS4 and the audio/video recording, after entering the apartment building, CS4 walked up a staircase and knocked on the front door of Apartment 1N. Moments later, WILLIAMS answered the door in his underwear. CS4 asked, "I didn't wake you, did I?" WILLIAMS replied, "Yeah." WILLIAMS then distributed two clear, knotted baggies to CS4 in exchange for \$100.

57. At approximately 11:06 a.m., using a pole camera, LEOs observed CS4 exit the Forest Avenue apartment building and enter the UCV. The UCO then drove CS4 to a predetermined location where LEOs met with CS4 and recovered two clear, knotted baggies, each containing a white rock-like substance. According to the Illinois

³⁵ Only CS4's side of the conversation was captured on the audio/video recording device worn by CS4.

State Police Forensic Laboratory, the contents of the baggies weighed approximately .8 grams and tested positive for cocaine base.

C. On or About November 12, 2020, WILLIAMS Sells Cocaine Base to CS4 Outside Apartment 1N of the Forest Avenue Apartment Building

58. On or about November 12, 2020, LEOs met with CS4 and directed CS4 to make another controlled purchase of narcotics from WILLIAMS inside the Forest Avenue apartment building. On that day, at approximately 9:47 a.m., LEOs searched CS4 for contraband, with negative results.

59. At approximately 9:49 a.m., CS4 had a consensually recorded conversation with WILLIAMS, who was using Williams Phone 2. During the call, CS4 asked, "You home?" WILLIAMS replied, "Yeah." CS4 asked, "Can I get a hundo [\$100 bag of crack cocaine]." WILLIAMS replied, "Alright. I'm here." CS4 stated, "Alright. I'll be there in a little bit. Bye."

60. At the conclusion of the meeting with CS4, CS4 was equipped with an audio/video recording device and provided with \$100 in government funds to purchase crack cocaine from WILLIAMS. LEOs activated the recording device and a UCO drove CS4 to the Forest Avenue apartment building in the UCV.

61. At approximately 10:03 a.m., CS4 exited the UCV and walked towards the Forest Avenue apartment building.

62. At approximately 10:04 a.m., CS4 had a conversation with WILLIAMS, who was using Williams Phone 1.³⁶ During the call, CS4 stated, “Hey, I’m in the back...I’m coming up.” Moments later, using a pole camera, LEOs observed CS4 enter the Forest Avenue apartment building. According to CS4 and the audio/video recording, after entering the Forest Avenue apartment building, CS4 walked up a staircase and knocked on the front door of Apartment 1N. About a minute later, WILLIAMS answered the door and distributed two clear baggies to CS4 in exchange for \$100. WILLIAMS stated, “I’m sorry [for the delay].” CS4 replied, “That’s okay. Thank you.” WILLIAMS replied, “Thank you.”

63. At approximately 10:05 a.m., using a pole camera, LEOs observed CS4 exit the Forest Avenue apartment building and enter the UCV. The UCO then drove CS4 to a predetermined location where LEOs met with CS4 and recovered two clear, knotted baggies, each containing a white rock-like substance. According to the Illinois State Police Forensic Laboratory, the contents of the two clear baggies weighed a total of approximately .8 grams and tested positive for cocaine base.

D. On or About November 18, 2020, WILLIAMS Sells Cocaine Base to CS4 Outside Apartment 1N of the Forest Avenue Apartment Building

64. On or about November 18, 2020, LEOs met with CS4 and directed CS4 to make another controlled purchase of narcotics from WILLIAMS inside the Forest Avenue apartment building.

³⁶ Only CS4’s side of the conversation was captured on the audio/video recording device worn by CS4.

65. At approximately 10:06 a.m., CS4 had a consensually-recorded conversation with WILLIAMS, who was using Williams Phone 2. During the call, CS4 asked, "Hey. You around?" WILLIAMS replied, "About 20 minutes. I'm on my way there [to the Forest Avenue apartment building] right now." CS4 asked, "You're on your way over there right now? About how long?" WILLIAMS replied, "About 30 minutes." CS4 stated, "Okay...give me a call when you roll up, okay?" WILLIAMS replied, "Okay."

66. At approximately 10:45 a.m., CS4 had a consensually-recorded conversation with WILLIAMS, who was using Williams Phone 2.³⁷ According to CS4, WILLIAMS told CS4 that WILLIAMS had arrived at the Forest Avenue apartment building. CS4 replied, "Alright. I'm going to head over there, alright?"

67. At the conclusion of the meeting with CS4, LEOs searched CS4 for contraband, with negative results. CS4 was then equipped with an audio/video recording device and provided with \$100 in government funds to purchase crack cocaine from WILLIAMS. LEOs activated the recording device and a UCO utilized a UCV to drive CS4 to the Forest Avenue apartment building.

68. At approximately 10:55 a.m., CS4 had a consensually-recorded conversation with WILLIAMS, who was using Williams Phone 2.³⁸ During the call, CS4 stated, "Hey, I'm pulling up now...By your house...Where do you want me to

³⁷ Only CS4's side of the conversation was captured on the audio/video recording device worn by CS4.

³⁸ Only CS4's side of the conversation was captured on the audio/video recording device worn by CS4.

come? Front or back...Okay, alright...A hundo [\$100 bag of crack cocaine]...I've never been to the front, so...Alright, bye."

69. At approximately 10:56 a.m., CS4 exited the UCV and walked towards the Forest Avenue apartment building. Moments later, using a pole camera, LEOs observed CS4 enter the Forest Avenue apartment building. According to CS4 and the audio/video recording, after entering the apartment building, CS4 walked up a staircase and met with WILLIAMS, who opened the front door of Apartment 1N before CS4 could knock. CS4 stated, "Hey you." WILLIAMS replied, "I finna walk down there [outside]." WILLIAMS exited Apartment 1N and distributed one baggie to WILLIAMS in exchange for \$100. WILLIAMS stated, "That's just one solid gram." CS4 replied, "Okay."

70. At approximately 10:58 a.m., using a pole camera, LEOs observed CS4 and WILLIAMS exit the Forest Avenue apartment building. CS4 entered the UCV and WILLIAMS walked towards the parking lot located behind the Forest Avenue apartment building. The UCO then drove CS4 to a predetermined location where LEOs met with CS4 and recovered a clear, knotted baggie, containing a white rock-like substance. According to the Illinois State Police Forensic Laboratory, the contents of the baggie weighed a total of approximately .9 grams and tested positive for cocaine base.

E. Seizure of Cocaine Base from Apartment 1N Located Within the Forest Avenue Apartment Building

71. On or about November 17, 2020, LEOs obtained a federal search warrant, 20 M 605, to search the residence located at "4509 Forest Avenue,

Apartment 1N, Brookfield, IL” for evidence, instrumentalities, fruits, and contraband related to narcotics offenses in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

72. On or about November 23, 2020, at approximately 2:56 p.m., LEOs executed the search warrant and encountered WILLIAMS and Individual B in the parking lot of the Forest Avenue apartment building at approximately the same time that LEOs executed the search warrant. No one was encountered inside of Apartment 1N at the time entry was made. After their entry into Apartment 1N, LEOs conducted a systematic search of the apartment.

73. From the living room, hidden inside a weight bench, LEOs recovered two clear knotted plastic bags, each containing a white rock-like substance. According to the Illinois State Police Forensic Laboratory, the substance inside the bags weighed a total of approximately 43.7 grams and tested positive for cocaine base. Also recovered from inside the weight bench were three clear knotted plastic bags containing a pressed tan powdery substance. According to the Illinois State Police Forensic Laboratory, the substance inside the bags weighed a total of approximately 13.6 grams and tested positive for heroin. Based on my training and experience, the quantity of narcotics recovered is not a user quantity of narcotics, but rather indicates that the individual in possession of the narcotics intended to distribute the narcotics.

74. Additionally, from the master bedroom, LEOs recovered approximately \$8,770 in suspected narcotics proceeds, narcotics packaging, and a digital scale. Furthermore, while searching the master bedroom, LEOs observed several sets of

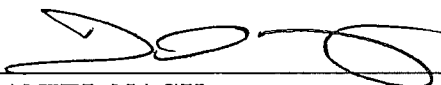
male clothing in the closet and dressers, as well as photos of WILLIAMS. Additionally, WILLIAMS' Illinois state identification card was found on the TV stand within the master bedroom.

CONCLUSION

75. Based on the foregoing, I respectfully submit that there is probable cause to believe that (1) on or about July 8, 2020, FRANCISCO SANCHEZ-YANEZ, DIEGO GALEANA-GONZAGA, SERGIO SANCHEZ-CHAVEZ, and JUAN ROSAS-CABRERA knowingly and intentionally distributed a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); (2) on or about July 8, 2020, VIRGINIA VAZQUEZ-PEREZ knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); (3) on or about July 8, 2020, DELVIN WILLIAMS knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); and (4) on or about November 23, 2020, DELVIN WILLIAMS knowingly and intentionally possessed with intent to distribute a controlled substance, namely, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II


Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.



DANIEL NAGY
Special Agent, Homeland Security
Investigations

Pursuant to Fed. R. Crim. P. 4.1, this Affidavit is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the statements in the Affidavit by telephone this 25th day of May, 2021



SUSAN E. COX
United States Magistrate Judge