

FILED
5/10/2022THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CASE NUMBER: 22CR263

NATHANIEL EVANS

aka "Head" and "Bro";

JARELLE JONES

aka "Hell Rell" and "Relle";

MARQUIS JONES

aka "Tunchie" and "Toon";

DEVONTAY LOGAN

aka "Vontay," "Tay," and "V-Tay";

JOSEPH WILLIAMS

also known as "Jo Jo";

DORNELL WILLIAMS

also known as "D-Nice";

TEREMIUS WEBB

also known as "T-Roy" and "Peanut";

ANTONIO FLETCHER

also known as "P";

KYLE LINTON; and

MAURICE BELL

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning in at least February 2021, and continuing to present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Section

Title 21, United States Code, Section 846

Offense Description

conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, namely, 400 grams or more of mixtures and substances containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Controlled Substance; and 500 grams or

more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

CHUNG S KIM Digitally signed by CHUNG S KIM
Date: 2022.05.10 10:16:34 -05'00'

CHUNG KIM
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 Complaint and Affidavit by telephone.

Date: May 10, 2022


Judge's signature

City and state: Chicago, Illinois

Sheila M. Finnegan, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CHUNG KIM, being duly sworn, state as follows:

PRELIMINARY MATTERS

1. I am a Special Agent with the Homeland Security Investigations (HSI), and have been so employed for approximately three years. I am currently assigned to the Public Safety/Gang Unit, and my responsibilities include the investigation of narcotics trafficking offenses. As part of my duties as an HSI Special Agent, I investigate narcotics trafficking offenses, including violations of the federal controlled substance laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, and 846.

2. This affidavit is submitted in support of a criminal complaint charging:

- a. Nathaniel Evans, also known as “Head” and “Bro”;
- b. Jarelle Jones, also known as “Hell Rell” and “Relle”;
- c. Marquis Jones, also known as “Tunchie” and “Toon”;
- d. Devontay Logan, also known as “Vontay,” “Tay,” and “V-tay”;
- e. Joseph Williams, also known as “Jo Jo”;
- f. Dornell Williams, also known as “D-Nice”;
- g. Teremius Webb, also known as “T-Roy and “Peanut”;
- h. Antonio Fletcher, also known as “P”;
- i. Kyle Linton; and,
- j. Maurice Bell;

3. Defendants herein conspired with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, namely, 400 grams or more of mixtures and

substances containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Controlled Substance; and 500 grams or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846.

4. The information in this affidavit is based on my participation in this investigation, information provided by other local and federal law enforcement officers (“LEOs”); physical surveillance, controlled purchases of narcotics, search warrants, tracking device warrants, review of consensually recorded conversations and conversations intercepted pursuant to court orders authorizing the interception of wire communications, law enforcement reports, laboratory reports, criminal history records, information obtained from members of the drug trafficking organization, witnesses and other persons with knowledge of relevant facts, my training and experience, and the training and experience of other law enforcement officers with whom I have consulted. Because this affidavit is being submitted for the limited purpose of establishing probable cause for this complaint, I have not included each and every fact known to me concerning this investigation.

I. OVERVIEW OF THE CONSPIRACY

5. Beginning in at least February 2021, and continuing until the present, members of the Four Corner Hustler street gang (FCH), led by NATHANIEL EVANS, have operated a narcotics distribution organization (the EVANS DTO) that operated

open-air drug markets near approximately 3927 West Jackson Boulevard (the Jackson drug spot), approximately 3953 West Van Buren Street (the Van Buren drug spot), approximately 4006 West Maypole Avenue (the Maypole drug spot) and sold narcotics elsewhere on the west side of Chicago. EVANS and others used a stash house located at 3650 West Chicago Avenue to count and sort drug proceeds, as well as to mix, cut, prepare and package narcotics for delivery to the drug spots. When the drug spots needed to be resupplied, EVANS and others delivered the narcotics from 3650 West Chicago Avenue to the drug spots or to runners who would then deliver the narcotics to the drug spots and/or stash houses located closer to the drug spots, including 3927 West Jackson Boulevard, 3912 West Jackson Boulevard, 3953 West Van Buren Street, where they were then sold in user or dealer quantities to customers of the EVANS DTO. When sold in dealer quantities, the narcotics were often packaged in a consistent manner, namely, black plastic bags containing rubber-banded packets of 15 smaller Ziplock baggies containing narcotics. The EVANS DTO used the term “pack” to refer to a group of 15 smaller Ziplock baggies rubber-banded together and the term “bundle” to refer to a group of 18 packs. Thus, a “bundle” would typically contain 270 smaller Ziplock baggies. After the narcotics sales, portions of the narcotics proceeds were turned over to EVANS. DEVONTAY LOGAN, JOSEPH WILLIAMS, DORNELL WILLIAMS, MAURICE BELL and others delivered narcotics to the drug spots. LOGAN also supervised the collection of narcotics proceeds from the Jackson drug spot, met with suppliers, and resupplied the Jackson drug spot. The Jackson and Van Buren drug spots were managed by JARELLE

JONES, MARQUIS JONES, and JOSEPH WILLIAMS, while, DORNELL WILLIAMS, TEREMIUS WEBB, ANTONIO FLETCHER, KYLE LINTON and others known and unknown sold the EVANS DTO's narcotics to customers at the drug spots.

II. OVERVIEW OF INDIVIDUAL ROLES IN THE CONSPIRACY

6. Based upon intercepted communications, surveillance, and other investigative activity, and as set forth in more detail below, the co-conspirators are as follows:

A. NATHANIEL EVANS

7. NATHANIEL EVANS directs operations of the EVANS DTO, including by supervising drug spots, directing individuals who were employed at the drug spots, controlling the supply of narcotics to the drug spots, delivering narcotics, and collecting proceeds from the drug spots. *See passim.*

B. JARELLE JONES

8. JARELLE JONES is a shift manager for the Jackson drug spot, and was a former shift manager for the Van Buren drug spot. *See ¶¶ 29-43, 55d, 57-63, 71-90.*

C. MARQUIS JONES

9. MARQUIS JONES was a former shift manager for the Jackson drug spot and is currently a shift manager for the Van Buren drug spot. *See ¶¶ 29, 41-43, 48, 53-54, 55b, 71-83, 91-104, 125-126.*

D. DEVONTAY LOGAN

10. LOGAN is a narcotics runner and manager for the EVANS DTO who picks up narcotics from suppliers, delivers the narcotics to the Jackson drug spot, and collects narcotics proceeds for EVANS. *See ¶¶ 29-40, 56-69, 72-83, 116-121, 128-129.*

E. JOSEPH WILLIAMS

11. JOSEPH WILLIAMS sold narcotics for the EVANS DTO at the Jackson drug spot, and then was promoted to shift manager of the Jackson drug spot. JOSEPH WILLIAMS also meets with the narcotics suppliers, including LOGAN and EVANS, to resupply the Jackson drug spot, stores narcotics for the Jackson drug spot in his residence across the street from the drug spot, at 3912 West Jackson Boulevard, from which he resupplies the Jackson drug spot as needed. *See ¶¶ 44-54, 91-126.*

F. DORNELL WILLIAMS

12. DORNELL WILLIAMS is a shift manager for the Jackson drug spot. WILLIAMS also serves as a narcotics runner for the Jackson drug spot, and meets with EVANS, LOGAN, and others to obtain narcotics to supply the Jackson drug spot. *See ¶¶ 44-49, 64-70.*

G. TEREMIUS WEBB

13. WEBB was a street level dealer for the EVANS DTO at the Jackson drug spot and is currently a shift manager at the Van Buren drug spot. *See ¶¶ 128-150.*

H. ANTONIO FLETCHER

14. ANTONIO FLETCHER was a street level dealer who sold narcotics for the EVANS DTO. *See ¶¶ 105-116.*

I. KYLE LINTON

15. KYLE LINTON was a street level dealer who sold narcotics for the EVANS DTO at the Jackson drug spot. *See ¶¶ 137-152.*

J. MAURICE BELL

16. BELL is a narcotics runner who meets with EVANS to obtain narcotics for resale at the Maypole drug spot. *See ¶¶ 23-28, 55a.*

III. THE EVANS DTO COORDINATED DRUG TRAFFICKING THROUGH THE USE OF CELLULAR TELEPHONES

17. As set forth in more detail below, EVANS and other co-conspirators coordinated the operation of the EVANS DTO using cellular telephones to discuss operation of the drug spots, including staffing, narcotics supply, the collection of narcotics proceeds, and efforts to avoid law enforcement. The investigation included court-authorized interceptions of communications over various cellular telephones used by the following individuals:¹

| Target Phone | Phone Number | User | Date Order Authorized | Interception Period |
|---------------------|--------------------------------|-----------------|--|--|
| Target Phone 1 | (XXX)XXX-3720 | TEREMIUS WEBB | May 5, 2021 | 5/6/21 to 6/4/2021 |
| Target Phone 2 | (XXX)XXX-1201 | DEVONTAY LOGAN | July 30, 2021 August 31, 2021 | 7/31/21 to 8/28/21 9/1/21 to 9/29/21 |
| Target Phone 3 | (XXX)XXX-1350 | JARELLE JONES | September 8, 2021 November 2, 2021 | 9/9/21 to 10/8/2021 11/2/21 to 12/1/21 |
| Target Phone 4 | (XXX)XXX-8089 (XXX)XXX-0184 | MARQUIS JONES | November 2, 2021 April 25, 2022 | 11/2/21 to 12/1/21 4/26/22 to present |
| Target Phone 5 | (XXX)XXX-2836 | NATHANIEL EVANS | December 10, 2021 | 12/11/21 to 12/20/21 |

¹ The Chief Judge or Acting Chief Judge of the Northern District of Illinois issued authorizations for 30-day interception periods for each of the below-described Target Phones.

| | | | | |
|-------------------|--|--------------------|---|--|
| Target Phone 6 | (XXX)XXX- 8031 (XXX)XXX- 8129 | JOSEPH WILLIAMS | February 24, 2022 March 24, 2022 April 25, 2022 | 2/24/22 to 3/24/22 3/24/22 to 4/22/22 4/26/22 to present |
| Target Phone 7 | (XXX)XXX- 1406 | MARQUIS JONES | April 25, 2022 | 4/26/22 to present |

IV. PURCHASES OF CONTROLLED SUBSTANCES FROM THE EVANS DTO

18. Based on surveillance, pack workers at the Jackson and Van Buren drug spots conducted hand-to-hand transactions daily.

19. Between February 2021 and April 2022, undercover officers and confidential sources made controlled purchases² of narcotics, from drug spots operated by the EVANS DTO. In total, LEOs made controlled purchases of an approximate gross weight of 1.04 kilograms of suspect heroin from the Jackson drug spot, an approximate gross weight of 286 grams of suspect heroin from the Van Buren drug spot, and an approximate gross weight of 273 grams of suspect heroin from the Maypole drug spot. The suspect heroin purchased at the spots was typically packaged in smaller Ziplock baggies and sold for \$10 per baggie with discounts given for higher quantity sales. LEOs purchased suspect heroin from various members of the DTO, including but not limited to:

² A “controlled purchase,” as discussed in this affidavit, refers to a purchase of narcotics from a subject during which an undercover agent was equipped with a recording device and/or a confidential source was monitored via video recording. Both the undercover agent and confidential sources were given agency-provided funds, surveilled to the purchase, surveilled conducting the purchase, and surveilled as he/she returned to meet with law enforcement agents following the purchase. At that meeting, the CS or UC provided the purchased narcotics and excess funds, if any, to law enforcement. When the individual conducting the purchase was a confidential source, that source was searched for money and contraband prior to and following the purchase. All suspect narcotics were sent to a lab for testing and analysis. For purposes of this affidavit, where analysis has been completed, the narcotics are referred to as “heroin” or “cocaine”; where analysis is pending, the type of narcotics are described as suspect narcotics, based on my training and experience and the training and experience of others with whom I have consulted.

- a. An approximate gross weight of 362.6 grams of suspect heroin from MARQUIS JONES at both the Jackson drug spot and the Van Buren drug spot.
- b. An approximate gross weight of 24 grams of suspect heroin from JOSEPH WILLIAMS at the Jackson drug spot.
- c. An approximate gross weight of 345.9 grams of suspect heroin from ANTONIO FLETCHER at the Jackson drug spot and other locations on the west side of Chicago.
- d. An approximate gross weight of 1.13 kilograms of suspect heroin from TEREMIUS WEBB at both the Jackson drug spot and the Van Buren drug spot.
- e. An approximate gross weight of 724 grams of suspect heroin from KYLE LINTON at the Jackson drug spot.

V. SEIZURES OF CONTROLLED SUBSTANCES FROM THE EVANS DTO

20. During the investigation, law enforcement officers made multiple seizures of narcotics, including the following:

- a. On or about December 8, 2021, LEOs seized narcotics after EVANS delivered them to BELL. The narcotics consisted of: (1) Two black plastic bags, with 18 rubber-banded bundles. Each bundle contained 15 smaller Ziplock baggies for a total of 270 small Ziplock baggies. Each of the smaller Ziplock baggies contained about 1 gram of an off-white substance, suspect heroin. Collectively, the small Ziplock baggies had an approximate gross weight of 678.39 grams. Samples of the off-white substance from approximately 30 baggies weighing approximately 28.95 grams were tested, and were determined to be a mixture of heroin and fentanyl; and

(2) a plastic bag containing approximately 26.71 grams of a white chunky substance was tested and determined to be mixtures containing cocaine. *See* ¶¶ 22-28.

b. On or about January 5, 2022, LEOs seized narcotics that LOGAN delivered to DORNELL WILLIAMS. The seized narcotics consisted of two large black plastic bags with an approximate gross weight of 733.96 grams. The large black plastic bags contained many smaller Ziplock baggies with flowers and faces on them, each of which contained an off-white/tan powder, suspect heroin. Some of the smaller Ziplock baggies were rubber-banded together in groups of 15, while others were separated with broken rubber bands at the bottom of the bag. Thirty of the smaller Ziplock baggies, each containing approximately 1 gram of off-white/tan powder, were tested and determined to be a mixture of 30.21 grams of heroin and fentanyl. *See* ¶¶ 64-69.

c. On or about March 25, 2022, pursuant to a search warrant, LEOs searched 3650 West Chicago Avenue, 2 Rear, in Chicago, a stash house used by the EVANS DTO to store, package, and distribute narcotics for delivery to the EVANS DTO's drug spots or to narcotics runners who would deliver to the EVANS DTO's drug spots. The occupants of the unit fled shortly before law enforcement's entry into the unit. Inside the unit, LEOs found a narcotics packaging operation, including tables set up with narcotics, scales, blenders, and substances used to dilute or cut heroin as well as other tools used to process and package narcotics. Law enforcement seized approximately \$58,360, a money counter, a gross weight of approximately 4.62 kilograms of suspect heroin, of which 156.67 grams were tested and determined to be

heroin, a gross weight of approximately 4.16 kilograms of suspect cocaine, a gross weight of approximately 80.12 grams of suspect marijuana, one AK-47 rifle, one MAC-10 submachine gun with suppressor, one Taurus handgun with a high-capacity magazine, one Kahr 9mm handgun, approximately 17 cell phones and over 450 rounds of various ammunition. LEOs later identified one of the approximately 17 seized phones as Target Phone 5, used by NATHANIEL EVANS. *See ¶¶ 122-124.*

VI. FACTS IN SUPPORT OF PROBABLE CAUSE

A. EVANS Supervised the EVANS DTO's Drug Trafficking

21. From February 2021 through the present, NATHANIEL EVANS has directed the EVANS DTO, overseeing narcotics sales at the Jackson, Van Buren, and Maypole drug spots. EVANS also delivers narcotics to supply the drug spots and collects narcotics proceeds from the drug spots.

1. December 8, 2021 - NATHANIEL EVANS Delivered Narcotics to MAURICE BELL

22. In summary, and as set forth in more detail below, on December 8, 2021, EVANS retrieved heroin and cocaine for resale from the EVANS DTO's stash house at 3650 West Chicago Avenue, and then delivered the narcotics to MAURICE BELL, for delivery to the Maypole drug spot.

23. On December 8, 2021, at approximately 11:53 a.m., using a pole camera, LEOs observed a black 2014 Dodge Durango arrive and park behind 3650 West Chicago Avenue, a location which, as described above, is used by the EVANS DTO to store, package, and distribute narcotics for delivery to drug spots by the EVANS DTO. At that time, EVANS exited the driver's seat and entered 3650 West Chicago Avenue,

2 Rear. At approximately 11:59 a.m., using a pole camera, agents observed EVANS exit the rear door of 3650 West Chicago Avenue, 2 Rear carrying a black plastic bag. EVANS reentered the black 2014 Dodge Durango and drove away. Due to the view of the pole camera, LEOs did not observe if EVANS placed the black plastic bag underneath the hood of the vehicle.

24. At approximately 12:05 p.m., using a pole camera, LEOs observed the black 2014 Dodge Durango arrive and park near 4110 West Maypole Avenue. At that time, EVANS exited the driver's seat and opened the hood. Shortly after, LEOs observed BELL approach EVANS and hand EVANS a yellow envelope in exchange for the black plastic bag. EVANS then closed the hood, entered the driver's seat and departed the area. LEOs observed BELL, carrying the black plastic bag he received from EVANS, enter the residence located at 4109 West Maypole Avenue.

25. At approximately 12:19 p.m., using a pole camera, LEOs observed BELL, carrying the black plastic bag, now accompanied by a female, exit the residence located at 4109 West Maypole Avenue. LEO's observed BELL look behind him several times and hand the female the black plastic bag as they walked east down Maypole together.

26. About three minutes later, at approximately 12:22 p.m., LEOs in unmarked police vehicles approached BELL and the female. As LEOs exited the unmarked police vehicle, both BELL and the female ran. BELL ran west down Maypole, dropped a clear plastic bag, and was stopped by LEOs after a brief foot

chase. The female ran east a few feet, dropped the black plastic bag and was stopped by LEOs.

27. The black plastic bag, which BELL handed the female, contained two black plastic bags, each plastic bag held approximately 18 rubber-banded bundles, each of which comprised 15 smaller Ziplock baggies, for a total of 270 smaller Ziplock baggies containing an off-white substance, suspect heroin, with a gross weight of 678.39 grams. Samples of the off-white substance from approximately 30 baggies weighing approximately 28.95 grams were tested, and were determined to be a mixture of heroin and fentanyl. LEOs also recovered a plastic bag, which BELL dropped when law enforcement approached him, containing approximately 26.71 grams of a white chunky substance was tested and determined to be mixtures containing cocaine.

28. BELL was advised of his *Miranda* rights, waived those rights, and agreed to speak to LEOs. BELL stated that EVANS paid him to make narcotics deliveries a few times a week, for which EVANS paid BELL \$400-500 per delivery. Bell stated that he [BELL] had received the narcotics contained in the black plastic and clear plastic bags, recovered by LEOs, from EVANS. BELL stated he was delivering the narcotics to an individual he knows as “Mike” on the 4000 block of Maypole Avenue.³

³ Based on controlled purchases from the Maypole drug spot, LEOs identified “Mike” as a street level dealer at the Maypole drug spot.

**2. August 4, 2021 - EVANS Collected Proceeds from
DEVONTAY LOGAN at the Jackson Drug Spot**

29. In summary, and as set forth in more detail below, on or about August 4, 2021, LOGAN collected approximately \$12,600 in narcotics proceeds from JARELLE JONES, which LOGAN delivered to EVANS later that day.

30. On or about August 4, 2021, at approximately 1:37 p.m., (July 30, 2021 Order, session #5251)⁴ LOGAN⁵ placed an outgoing call to JARELLE JONES,⁶ who was using Target Phone 3. During the conversation⁷, JARELLE JONES stated, “I got

⁴ This investigation involved separate interception periods on several Target Phones. Each new interception period began with call number 1. For that reason, throughout this affidavit I have specified which Order pertains to each call session.

⁵ LEOs identified LOGAN as the user of Target Phone 2 based on the following: On or about March 11, 2021, at approximately 10:45 a.m., EVANS, who was incarcerated in Cook County Jail, placed an outgoing call to his girlfriend, using telephone number (XXX)XXX-4975. According to LEOs’ review of the call, which was recorded pursuant to Cook County Jail policy, during the conversation, EVANS directed his girlfriend to place a three-way call to “Vontay,” [LOGAN]. EVANS’ girlfriend placed the three-way call to LOGAN and during their conversation, LOGAN provided EVANS with his cell phone number, Target Phone 2. About a week later, on or about March 18, 2021, using a pole camera, LEOs observed LOGAN exit a vehicle parked in front of 3927 West Jackson Boulevard. Law enforcement identified LOGAN based on comparison to his State of Illinois driver’s license photograph. At that time, LEOs placed an outgoing call to Target Phone 2. LEOs observed as LOGAN appeared to answer a cell phone in his possession. A LEO asked to speak to Juan, at which point LOGAN informed the LEO that he/she had the wrong phone number and disconnected the call. Further, according to T-Mobile records, Target Phone 2 is subscribed to DEVONTAY LOGAN at 4010 West Jackson, Chicago, Illinois.

⁶ LEOs identified JARELLE JONES as the user of Target Phone 3 as follows: on or about March 19, 2021, at approximately 12:44 p.m., using a City of Chicago police observation device (“POD camera”), LEOs observed JARELLE JONES walking near the intersection of Adams Street and Pulaski Road in Chicago, which is approximately two blocks from the drug spot. LEOs identified JARELLE JONES based on a comparison to his State of Illinois driver’s license photograph. At that time, law enforcement placed an outgoing call to Target Phone 3. Law enforcement observed as JARELLE JONES appeared to answer a cell phone in his possession. A LEO heard JARELLE JONES answer hello. A LEO then asked for Meghan, at which point LEOs heard JARELLE JONES disconnect the call and observed JARELLE JONES return the cell phone to his coat pocket.

⁷ The transcripts of the 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 contents and context of the conversations, my familiarity with the facts and circumstances of the investigation, my

a whole one [bundle of narcotics] left and halfway through the last one ... I got one and a half left.” LOGAN replied, “Alright.”

31. At approximately 2:21 p.m. (July 30, 2021 Order, session #5259), LOGAN, who was using Target Phone 2, received an incoming call from JARELLE JONES, who was using Target Phone 3. During the conversation, JARELLE JONES asked, “Yesterday, when you first brung the whole count [additional bundles of heroin], what the fuck was it?” LOGAN replied, “Seven [bundles].” JARELLE JONES stated, “It was seven?” LOGAN replied, “What you talkin’ bout yesterday? I brought something new yesterday.” JARELLE JONES asked, “No, I’m saying you brung the seven count, and what the fuck does that put us at? Eight?” LOGAN replied, “...and Tunchie [MARQUIS JONES]⁸ owed them last one [the final bundle], too.” JARELLE JONES asked, “Right, so what the fuck [how much money] he give you yesterday?” LOGAN replied, “Look, he owed me eight counts [narcotics proceeds for 8 bundles of heroin] ... he only gave me seven, so I gave him seven more [bundles]. He owed me the whole last one.” JARELLE JONES asked, “Alright, so we back at eight, right?” LOGAN replied, “Yeah.” JARELLE JONES and LOGAN continued to discuss how many bundles of heroin JARELLE JONES was responsible for. Later in the

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. The times listed for the recorded conversations are approximate.

⁸ Based on court-authorized interceptions, law enforcement identified “Tunchie” as a nickname that MARQUIS JONES is referred to by his narcotics associates.

conversation, LOGAN asked, “So how many counts you got? Seven?” JARELLE JONES replied, “Yeah.” LOGAN stated, “Alright, let me make a call real quick.”

32. At approximately 2:25 p.m. (July 30, 2021 Order, session #5262), LOGAN, who was using Target Phone 2, placed an outgoing call to JARELLE JONES, who was using Target Phone 3. During the conversation, LOGAN stated, “Yeah, he [MARQUIS JONES] gave Head [EVANS]⁹ one, so y’all should have seven [bundles].” JARELLE JONES replied, “Right, see...(unintelligible).” LOGAN stated, “Alright, it should be just seven [bundles of narcotics].” JARELLE JONES replied, “Alright, bet...”

33. At approximately 3:33 p.m. (July 30, 2021 Order, session #5269), LOGAN, who was using Target Phone 2, placed an outgoing call to JARELLE JONES, who was using Target Phone 3. During the conversation, LOGAN stated, “...Let me know when you low [need a supply of narcotics].” JARELLE JONES replied, “Alright, bet. The last one [bundle] out there though, but they [the street dealers on the drug spot] still have them.” LOGAN stated, “Alright bet.” Based on my knowledge of the investigation and my training and experience, LOGAN asked JARELLE JONES if the supply of narcotics inside the stash house was running low, and JARELLE

⁹ EVANS uses the nickname “Head.” On or about November 3, 2021, at approximately 10:09 a.m. (November 2, 2021 Order, call session #5078), JARELLE JONES called EVANS and stated, “We supposed to start, this is what I’m saying, we was supposed to start working yesterday, cuz, and nobody, they talking about, ‘Head said, Head talking about...” EVANS responded, “What you steady saying Head bro! Stop saying my name bro! ...” Based on my training and experience, EVANS was upset with JARELLE JONES for using his name on a call and with the spot workers, because EVANS feared law enforcement detection.

JONES told LOGAN that his workers were still selling the heroin contained in the last bundle.

34. At approximately 4:44 p.m. (July 30, 2021 Order, session #5272), LOGAN, who was using Target Phone 2, received an incoming call from JARELLE JONES, who was using Target Phone 3. During the conversation, JARELLE JONES stated, “Yeah, that shit [narcotics] gone shorty.” LOGAN’s response was unintelligible. Based on my knowledge of the investigation and my training and experience, JARELLE JONES told LOGAN that the supply of narcotics inside the stash house located at 3927 West Jackson Boulevard was running low.

35. At approximately 6:20 p.m. (July 30, 2021 Order, session #5278), LOGAN who was using Target Phone 2, placed an outgoing call to JARELLE JONES, who was using Target Phone 3. During the conversation, LOGAN asked, “...Hey, you got the count [money] ready already?” JARELLE JONES replied, “Alright, that shit in the shoe box already, \$12,600.” LOGAN stated, “Alright.” Based on surveillance described below, my knowledge of the investigation and my training and experience, LOGAN, using Target Phone 2, asked JARELLE JONES if he had consolidated the narcotics proceeds, and JARELLE JONES told LOGAN that he had concealed \$12,600 in narcotics proceeds inside a shoe box.

36. At approximately the same time as the above call, using a pole camera, LEOs observed a silver 2021 Nissan sedan, driven by LOGAN, arrive and park in front of the 3927 West Jackson Boulevard stash house at the Jackson drug spot. LOGAN exited the silver 2021 Nissan Sedan and walked into the front yard of 3927

West Jackson Boulevard. LOGAN returned to the silver 2021 Nissan Sedan, opened the front driver's side door, retrieved a black backpack from the silver 2021 Nissan Sedan and entered the front door of 3927 West Jackson Boulevard.

37. At approximately 7:20 p.m., using a pole camera, LEOs observed LOGAN on the rear porch of 3927 West Jackson looking at a cell phone in his hand.

38. At approximately 7:33 p.m., using a pole camera, LEOs observed a white Toyota 4-Runner arrive and park on the 3900 block of West Jackson Boulevard. Moments later, LEOs observed EVANS exit the driver's seat of the white Toyota 4-Runner, walk through a vacant lot to the Jackson drug spot, and climb the rear staircase to the second floor of 3927 West Jackson Boulevard.

39. At approximately 7:36 p.m., using a pole camera, LEOs observed LOGAN walking through the vacant lot west of the Jackson drug spot, towards the building at 3927 West Jackson, holding a white shopping bag containing a weighted box similar in shape and size to a shoebox.

40. Moments later, LEOs observed LOGAN, standing in the vacant lot, engaged in a conversation with EVANS, who was standing on the rear staircase of 3927 West Jackson Boulevard, next to several unknown pack workers. LEOs observed LOGAN hold up the white shopping bag containing the suspected shoebox and gesture towards Jackson Boulevard. After the conversation ended, EVANS entered the rear entrance to 3927 West Jackson Boulevard and LOGAN ran through the vacant lot to the front of 3927 West Jackson Boulevard. About a minute later, LOGAN met with EVANS in front of 3927 West Jackson Boulevard and handed

EVANS the white shopping bag containing the suspected shoebox. EVANS placed the white bag inside the white Toyota 4-Runner, entered the driver's seat and departed the area. Based on surveillance and calls described above, my knowledge of the investigation and my training and experience, LOGAN provided EVANS with the shoebox containing \$12,600 in narcotics proceeds.

3. October 2, 2021 - NATHANIEL EVANS Arranged to Meet JARELLE JONES and MARQUIS JONES to Deliver Narcotics

41. In summary, and as set forth in more detail below, on or about October 2, 2021, EVANS arranged to meet MARQUIS JONES¹⁰, and JARELLE JONES in order to resupply them with narcotics for sale at the Jackson drug spot.

42. On or about October 2, 2021, at approximately 7:03 p.m. (September 8, 2021 Order, session #2835), JARELLE JONES received an incoming call on Target Phone 3, from MARQUIS JONES, who was using Target Phone 4. During the conversation, MARQUIS JONES stated, "Bro¹¹ [EVANS] finna bring the C [crack cocaine]." JARELLE JONES asked, "You said who?" MARQUIS JONES replied

¹⁰ LEOs identified MARQUIS JONES as the user of Target Phone 4 based on the following: On or about September 14, 2021, at approximately 1:58 p.m., using a pole camera, LEOs observed MARQUIS JONES, identified by comparison to his State of Illinois driver's license photograph, exit a silver Volvo sedan and walk over to the sidewalk near the intersection of Jackson Boulevard and Springfield Avenue. At that time, law enforcement placed an outgoing call to Target Phone 4 and observed as MARQUIS JONES appeared to answer a cell phone in his possession and was heard by law enforcement answering, "Hello?" A Spanish-speaking LEO replied in the Spanish language and law enforcement heard MARQUIS JONES ask, "Who's this?" The LEO continued to speak to MARQUIS JONES in the Spanish language until the LEO hung up.

¹¹ EVANS is identified as BRO based on the above interceptions during which MARQUIS JONES and JARELLE JONES discussed that "BRO" was bringing narcotics. JARELLE JONES then called EVANS, who confirmed he was on his way with the narcotics. In addition, as discussed below in ¶¶ 51-53, on or about April 1, 2022, JOSEPH WILLIAMS referred to EVANS as "Bro" following a meeting with EVANS.

unintelligibly. JARELLE JONES asked, “Bro bringin’ the C? You said Bro bringing the C?” MARQUIS JONES replied, “Yeah.” JARELLE JONES stated, “Tell him I’m pullin up [at the stash house] in like 7-8 minutes.” MARQUIS JONES stated, “Aight.” Based on my knowledge of the investigation and on my training and experience, JARELLE JONES informed MARQUIS JONES that EVANS was going to provide a supply of crack cocaine for resale to JARELLE JONES and MARQUIS JONES.

43. At approximately 7:21 p.m. (September 8, 2021 Order, session #2839), JARELLE JONES placed an outgoing call on Target Phone 3 to NATHANIEL EVANS¹², who was using Target Phone 5. During the conversation, JARELLE JONES stated, “Yo, I’m right here.” EVANS asked, “Alright, where Goofy at? Tunchie [MARQUIS JONES]?” JARELLE JONES replied, “His ass gonna, his ass just got in a Lyft, I just...he’s on his way, he should be there in five minutes.” EVANS stated, “Aight bet.” JARELLE JONES asked, “Did you smack ‘em [deliver the narcotics]?” EVANS stated, “Nah, hell nah, I’m finna bring all this shit [supply of narcotics]. I’m finna bring y’all’s too.” Based on the intercepted call described above, my knowledge of the investigation and on my training and experience, JARELLE JONES informed EVANS that MARQUIS JONES was en route to meet EVANS. Later in the

¹² LEOs identified EVANS as the user of Target Phone 5 based on the following: on or about October 1, 2021, at approximately 11:48 a.m., using a pole camera, LEOs observed EVANS standing on the sidewalk near the intersection of Jackson Boulevard and Pulaski Road. LEOs identified EVANS based on comparison to his State of Illinois driver’s license photograph. Law enforcement placed an outgoing call to Target Phone 5, and observed EVANS answer a cell phone in his possession and was heard by law enforcement answering, “Hello?” A LEO replied, “Is Jay there?” EVANS asked, “Hello, who are you looking for?” The LEO replied, “Is Jay there?” EVANS stated, “You got the wrong number,” and disconnected the call.

conversation, EVANS stated that he would bring the supplies of narcotics, including the supply for JARELLE JONES and MARQUIS JONES.

4. March 9, 2022 - EVANS Resupplied the Jackson Drug Spot and Collected Proceeds

44. In summary, on or about March 9, 2022, EVANS delivered a supply of narcotics from the stash house at 3650 West Chicago Avenue to the Jackson drug spot and collected proceeds. Following the delivery, JOSEPH WILLIAMS,¹³ using Target Phone 6, informed DORNELL WILLIAMS that he [DORNELL WILLIAMS] owed EVANS a hundred dollars in addition to the narcotics proceeds that he provided EVANS earlier that day.

45. On or about March 9, 2022, at approximately 12:43 p.m., using a pole camera, LEOs observed Individual A exit the second-floor door behind 3650 West Chicago Avenue and stand in front of the door on the second floor. At that time, a black 2014 Dodge Durango arrived and parked on the concrete slab behind 3650 West Chicago Avenue. EVANS exited the driver's seat of the black 2014 Dodge Durango and opened the hood of the vehicle. At that time, Individual A threw a plastic bag

¹³ LEOs identified JOSEPH WILLIAMS as the user of Target Phone 6 as follows: on or about January 11, 2022, at approximately 11:03 a.m., using a pole camera, LEOs observed JOSEPH WILLIAMS, who LEOs previously identified based on comparison to his State of Illinois driver's license photograph, standing in front of the stash house located at 3912 West Jackson Boulevard. At that time, a LEO placed an outgoing call to Target Phone 6. Using a pole camera, LEOs observed WILLIAMS retrieve a cell phone from his pocket, look at the front screen and press a button on the side of the cell phone. During the call, Target Phone 6 rang one time and was sent to voicemail. LEOs observed WILLIAMS place the cell phone back into his pocket, and then enter the front of the stash house at 3912 West Jackson Boulevard. In addition, on or about October 19, 2021, an undercover officer equipped with an audio and video recording device, posed as a narcotics customer ("UC6"), had a conversation with WILLIAMS and made a controlled purchase of narcotics. UC6 later reviewed the controlled purchase audio and video recording then listened to call, April 25, 2022 Order, session #10412. UC6 identified WILLIAMS as the user of Target Phone 6.

formed in the approximate shape and size of a softball from the second-floor balcony to EVANS. EVANS caught the plastic bag with his hand, placed it underneath the hood of the black 2014 Dodge Durango, and closed the hood. EVANS then entered the driver's seat and departed the area. LEOs monitoring a court-authorized tracking device (22 M 77) installed on the black 2014 Dodge Durango observed the tracker move towards the Jackson drug spot.

46. At approximately 12:52 p.m., using a pole camera, LEOs observed the black 2014 Dodge Durango arrive and park in front of 3912 West Jackson Boulevard. At that time, EVANS exited the driver's seat of the vehicle, opened the hood, and retrieved what appeared to be the same plastic bag that was provided by Individual A. EVANS closed the hood, immediately placed the plastic bag in his jacket pocket, crossed the street on West Jackson Boulevard, and entered the front gate of 3927 West Jackson Boulevard.

47. Based on the above-described surveillance, EVANS received a supply of narcotics from Individual A and delivered the narcotics to the Jackson drug spot in exchange for narcotics proceeds that, according to the intercepted call described below, were provided to EVANS.

48. Approximately 22 minutes later (February 24, 2022 Order, session #5666) at 1:14 p.m., JOSEPH WILLIAMS received an incoming call on Target Phone 6 from DORNELL WILLIAMS, who was using telephone number (XXX) XXX-3881

(Subject Phone 22).¹⁴ During the conversation, JOSEPH WILLIAMS stated, “Ah yeah, Head [EVANS] said you owe him hundred dollars.” DORNELL WILLIAMS responded, “I don’t owe him shit.” JOSEPH WILLIAMS replied, “On the four [I affirm on the name of the Four Corner Hustlers], he said you was supposed to turned in 18 [\$1,800], you turned in 17 [\$1,700].” DORNELL WILLIAMS stated, “Man, man, yeah aight.” JOSEPH WILLIAMS replied, “On the four, that’s what he just said, boy.” DORNELL WILLIAMS stated, “Well, he ain’t getting it. What I look like selling a hundred packs¹⁵ and you only... Man you all got me fucked up, him and Tunchie [MARQUIS JONES].” JOSEPH WILLIAMS stated, “He [EVANS] said he ain’t got nothing to do with what you and Tunchie [MARQUIS JONES] was doing.” DORNELL WILLIAMS replied, “Well tell him [EVANS] I ain’t got nothing to do with that hundred.” JOSEPH WILLIAMS stated, “He [EVANS] said Tunchie [MARQUIS JONES] was supposed to did the same thing he did.” DORNELL WILLIAMS stated, “Yea, yea don’t worry about it.”

49. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, JOSEPH WILLIAMS told DORNELL

¹⁴ On or about November 21, 2021, at approximately 2:00 p.m., LEOs positively identified DORNELL WILLIAMS through an investigatory street stop at the location of 3915 W. Jackson Blvd. Later that same day, at approximately 5:41 p.m., LEO’s, while monitoring electronic surveillance observed DORNELL WILLIAMS standing at approximately 3919 W. Jackson Blvd. At that time, LEOs placed a call to (XXX) XXX-3881. LEOs observed, through electronic surveillance, DORNELL WILLIAMS retrieve a cell telephone from his right jacket pocket, look at it, and then place it to his right ear. When the call ended, LEOs observed DORNELL WILLIAMS put the phone back into his right jacket pocket.

¹⁵ According to my knowledge of the investigation, as well as and my training and experience, each “pack” generally contains approximately 12-15 smaller Ziplock baggies of narcotics. The EVANS DTO typically sells individual Ziplock baggies to narcotics customers for \$10 each; at times discounts were given for larger quantity purchases.

WILLIAMS that he owed EVANS one hundred dollars of narcotics proceeds from the last resupply of narcotics and collection of narcotics proceeds. DORNELL WILLIAMS stated that because he [DORNELL WILLIAMS] was the one who sold the narcotics, he will not pay EVANS the one hundred dollars.

5. April 1, 2022 - NATHANIEL EVANS Delivered Narcotics to JOSEPH WILLIAMS

50. In summary, on or about April 1, 2022, EVANS delivered narcotics to JOSEPH WILLIAMS.

51. On or about April 1, 2022, at approximately 1:23 p.m., LEOs observed JOSEPH WILLIAMS, driving a white van, arrive and park near 200 South Hamlin. About two minutes later, LEOs observed a white Hyundai sedan arrive and park directly in front of JOSEPH WILLIAMS' van. At that time, LEOs observed JOSEPH WILLIAMS exit the driver's seat of the white van carrying an unknown object and enter the passenger seat of the white Hyundai sedan. Moments later, JOSEPH WILLIAMS exited the passenger side of the white Hyundai sedan and returned to the driver's seat of the white van. Shortly after, both the white van, driven by JOSEPH WILLIAMS, and the white Hyundai sedan departed the area. LEOs on mobile surveillance continued to follow both vehicles.

52. At approximately 1:38 p.m., LEOs conducted a traffic stop on the white Hyundai sedan. LEOs conducting the traffic stop observed that EVANS was the sole occupant in the vehicle. During the conversation, EVANS provided LEOs with his driver's license and was released.

53. Later that same day, at approximately 3:33 p.m. (March 24, 2022 Order, session #7787), JOSEPH WILLIAMS received an incoming call on Target Phone 6 from MARQUIS JONES¹⁶, on Target Phone 7. During the conversation, JONES asked, “Still good [supplied with narcotics]?” JOSEPH WILLIAMS replied, “What?” JONES asked, “You still good?” JOSEPH WILLIAMS asked, “This Tunchie [MARQUIS JONES]?” JONES replied, “Yeah.” JOSEPH WILLIAMS stated, “Boy, I got up with “Bro” [EVANS] already, boy.” JONES stated, “Aight, bet. Ok.” MARQUIS JONES later stated, “I already asked already too. He’s cool.” JOSEPH WILLIAMS asked, “You say what? You gotta move [deliver narcotics] too?” MARQUIS JONES replied, “What?” JOSEPH WILLIAMS asked, “You got one [narcotics] for me too?” MARQUIS JONES replied, “I’m doing something else.”

54. Based on surveillance and the intercepted call described above, my knowledge of the investigation, and my training and experience, MARQUIS JONES contacted JOSEPH WILLIAMS to see if the Jackson drug spot was running low on narcotics. During that conversation, JOSEPH WILLIAMS stated that he received a supply of narcotics for resale from EVANS, and EVANS supplied WILLIAMS with narcotics just prior to law enforcement’s stop of EVANS.

¹⁶ Law enforcement identified MARQUIS JONES as the user of Target Phone 7 based on a voice comparison by a LEO who listened to a call on Target Phone 7, April 25, 2022 Order session #7787, and a call on Target Phone 4, February 24, 2022 Order session #5467, used by MARQUIS JONES, and confirmed that MARQUIS JONES was the user of both Target Phone 4 and Target Phone 7.

6. NATHANIEL EVANS Regularly Delivered Narcotics from the Stash House at 3650 West Chicago Avenue to the DTO's Drug Spots

55. In addition to the above-described deliveries, EVANS regularly delivered narcotics from the stash house at 3560 West Chicago Avenue, to the DTO's drug spots, including, but not limited to, the following:

a. On or about November 13, 2021, at approximately 11:33 a.m., LEOs observed EVANS exit the rear door of the stash house at 3650 West Chicago Avenue. EVANS walked to a black 2014 Dodge Durango, opened the hood, and placed a black plastic bag in the engine compartment. EVANS then entered the driver's side door of the Durango and drove away from the area. At approximately 11:39 a.m., LEOs observed EVANS park at approximately 4005 West Maypole Avenue. He then exited the black 2014 Dodge Durango and opened the hood. EVANS retrieved a black plastic bag from the engine compartment, then re-entered the Dodge Durango. At approximately 11:42 a.m. BELL entered the passenger side of the black 2014 Dodge Durango. Moments later BELL exited the black 2014 Dodge Durango carrying a black plastic bag and entered the residence at 4006 West Maypole Avenue. Based on my training and experience, and statements BELL later provided to LEOs, described above, I believe that EVANS delivered a supply of narcotics for resale to BELL.

b. On or about January 4, 2022, at approximately 4:26 p.m., using a pole camera, LEOs observed EVANS, carrying a black plastic bag, exit the rear door of the stash house at 3650 West Chicago Ave. At approximately 4:27 p.m., EVANS opened the hood of a black 2014 Dodge Durango that was parked behind 3650 West

Chicago Avenue, placed the black plastic bag in the engine compartment, and closed the hood. EVANS then entered the driver's seat and departed the area. Approximately 8 minutes later, using a pole camera, LEOs observed the black 2014 Dodge Durango arrive and park near 4058 West Fifth Avenue (approximately two blocks south of the Van Buren drug spot). EVANS exited the driver's seat and approached the hood of the black 2014 Dodge Durango. At approximately the same time, LEOs observed MARQUIS JONES cross the street on West Fifth Avenue carrying a brown grocery bag and approach EVANS. LEOs on mobile surveillance observed EVANS open the hood of the black 2014 Dodge Durango and remove a black plastic bag from the engine compartment. At the same time, LEOs observed MARQUIS JONES hand EVANS the brown grocery bag. EVANS placed the black plastic bag inside the brown grocery bag and then LEOs observed EVANS reach inside the brown grocery bag (that contained the black plastic bag), retrieve an unknown item, and hand it to MARQUIS JONES. At approximately 4:37 p.m., using a pole camera, LEOs observed MARQUIS JONES cross the street on West Fifth Avenue carrying the unknown item. EVANS closed the hood and returned to the driver's seat of the black 2014 Dodge Durango, carrying the brown grocery bag. EVANS then departed the area.

c. On or about February 20, 2022, at approximately 12:16 p.m., using a pole camera, LEOs observed EVANS exit the rear door of 3650 West Chicago Avenue and walk to a black 2014 Dodge Durango, which was parked behind 3650 West Chicago Avenue. EVANS opened the hood of the black 2014 Dodge Durango,

reached into the engine compartment, and closed the hood. Due to the obstructed view of the pole camera at that time, LEOs were unable to observe whether EVANS was carrying an item in his hands when he approached the black 2014 Dodge Durango. EVANS then entered the driver's seat and departed the area. On the same date, at approximately 12:23 p.m., using a pole camera, LEOs observed the black 2014 Dodge Durango arrive and park behind approximately 3912 West Jackson Boulevard. EVANS exited the driver's seat of the black 2014 Dodge Durango, opened the hood of the black 2014 Dodge Durango and reached into the engine compartment. Using a pole camera, LEOs observed EVANS close the hood and walk toward the rear gangway of 3912 West Jackson Boulevard with an unidentified item in his right hand. At approximately 12:24 p.m., EVANS returned to the black 2014 Dodge Durango and departed the area.

d. On or about February 28, 2022, at approximately 6:09 p.m., using a pole camera, LEOs observed EVANS exit the rear door of 3650 West Chicago Avenue and open the hood of a black 2014 Dodge Durango, which was parked behind 3650 West Chicago Avenue. At approximately the same time, an unidentified male (UM-7) exited the rear door of 3650 West Chicago Avenue, stood on the back deck overlooking EVANS, and tossed a softball-shaped plastic bag to EVANS. EVANS caught the bag, placed the bag in the engine compartment of the black 2014 Dodge Durango, and closed the hood. EVANS then entered the driver's seat of the black 2014 Dodge Durango and departed the area. Approximately 7 minutes later, using a pole camera, LEOs observed the black 2014 Dodge Durango arrive and park near 3916

West Jackson Boulevard. LEOs observed EVANS exit the black 2014 Dodge Durango, open the hood of the vehicle, reach into the engine compartment, and close the hood. EVANS concealed a bag inside his jacket pocket and walked towards the front entrance of 3927 West Jackson Boulevard. LEOs observed EVANS toss the bag that was concealed in his jacket pocket to JARELLE JONES. EVANS and JARELLE JONES then both entered the front entrance of 3927 West Jackson Boulevard.

e. On or about March 12, 2022, at approximately 4:39 p.m., using a pole camera, LEOs observed EVANS exit the rear door of 3650 West Chicago Avenue, walk to a black 2014 Dodge Durango, open the hood, and place an unknown object in the engine compartment. EVANS closed the hood, entered the driver's seat of the black 2014 Dodge Durango and departed the area. Six minutes later, at approximately 4:45 p.m., using a pole camera, LEOs observed the black 2014 Dodge Durango arrive and park on the 3900 block of West Jackson Boulevard. At that time, EVANS exited the driver's seat, opened the hood of the vehicle, and retrieved an unknown item. EVANS closed the hood, approached an unidentified male (UM8), and both individuals entered the front gate of 3927 West Jackson Boulevard.

B. DEVONTAY LOGAN Delivered Narcotics for the EVANS DTO,

56. DEVONTAY LOGAN is a narcotics runner for the EVANS DTO. LOGAN picked up narcotics from suppliers, delivered the narcotics to the Jackson drug spot, delivered narcotics to other members of the EVANS DTO, and collected narcotics proceeds.

1. August 12, 2021 - LOGAN Collected Proceeds and Resupplied the Jackson Spot

57. In summary, based on surveillance described below, my knowledge of the investigation and my training and experience, LOGAN collected narcotics proceeds from the Jackson drug spot. First, LOGAN collected the proceeds from the sale of five bundles, and then LOGAN returned to collect proceeds from the sale of the sixth bundle and to resupply the drug spot.

58. On or about August 12, 2021, at approximately 3:24 p.m., (July 30, 2021 Order, session #5712), LOGAN, who was using Target Phone 2, called Individual B. During the conversation, LOGAN stated, "Go to the front." Individual B replied, "I'm on the porch..." LOGAN asked, "They gave you all six [narcotics proceeds from the sale of 6 bundles of heroin] of them?" Individual B replied, "No." LOGAN stated, "I guess they ain't got nothing [narcotics proceeds] for me." Individual B replied, "I'm saying they ain't give me all six." LOGAN stated, "Alright, bring the five. I've got a (unintelligible)." Individual B replied, "Alright."

59. At approximately 3:25 p.m., using a pole camera, LEOs observed a silver 2021 Hyundai Sonata, driven by LOGAN, arrive and double-park on the 3900 block of Gladys Avenue, one block south of the Jackson drug spot. About a minute later, LEOs observed an unknown male approach the silver 2021 Hyundai Sonata and reach into the vehicle through the front passenger-side window. Moments later, the silver 2021 Hyundai Sonata departed the area. Based on the above call and my training and experience, I believe LOGAN received narcotics proceeds from this individual.

60. At approximately 3:30 p.m., (July 30, 2021 Order, session #5715), LOGAN received an incoming call from JARELLE JONES, who was using Target Phone 3. During the conversation, LOGAN asked, “You done with that last count [bundle]?” JARELLE JONES replied, “Yeah, I’ve been done.” LOGAN asked, “Who got it [narcotics proceeds]?” JARELLE JONES replied, “I got it.” LOGAN stated, “Aight. I finna come get it...”

61. At approximately 4:03 p.m., (July 30, 2021 Order, session #5733), LOGAN, who was using Target Phone 2, placed an outgoing call to JARELLE JONES, who was using Target Phone 3. During the conversation, LOGAN stated, “Hey, come in the front.” JONES replied, “I’m gonna have (unintelligible name) bring it [narcotics proceeds] down to you. Twelves [law enforcement] out there and I was worried.” LOGAN asked, “Say what?” JONES replied, “There was a whole bunch of trans [law enforcement vehicles] circling that bitch like they was finna come in that bitch and ... I’m finna have (unintelligible name) bring it [the proceeds] down to you.” LOGAN stated, “I got the shit [additional narcotics], too.” JONES replied, “Aight...” Based on my knowledge of the investigation and my training and experience, LOGAN told JONES that he was in possession of additional narcotics. Further, JONES warned LOGAN that law enforcement was in the area.

62. At approximately 4:07 p.m., using a pole camera, LEOs observed a suspected hand-to-hand narcotics transaction. After that transaction, law enforcement did not observe any hand-to-hand transactions and a line of suspected narcotics purchasers began forming in the alley at the Jackson drug spot. Several

minutes later, at approximately 4:10 p.m., LEOs observed LOGAN in the alley behind the drug spot and the hand-to-hand narcotics transactions had resumed. Based on my training and experience and the surveillance described above, I believe LOGAN collected narcotics proceeds and delivered a supply of narcotics to the Jackson drug spot.

2. August 11, 2021 - LOGAN Directed Individual B to Resupply JARELLE JONES with Narcotics

63. On or about August 11, 2021, at approximately 12:46 p.m. (July 30, 2021 Order, session #5671), LOGAN placed an outgoing call on Target Phone 2 to Individual B. During the conversation, LOGAN stated, “Hey. Bring me, uh, bring him [JARELLE JONES] two B’s [2 bundles of heroin] to the back [the rear of 3924 West Gladys Avenue].” Individual B stated, “Aight.” LOGAN added, “For Rell [JARELLE JONES].” Individual B replied, “Aight.”

1. January 5, 2022 - DEVONTAY LOGAN Delivered Narcotics to DORNELL WILLIAMS for the Jackson Drug Spot

64. In summary, on or about January 5, 2022, LOGAN delivered narcotics to DORNELL WILLIAMS. After the exchange, LEOs recovered an approximate gross weight of 746 grams of suspected narcotics from DORNELL WILLIAMS, samples of which later tested positive for heroin and fentanyl.

65. On January 5, 2022, LEOs observed LOGAN, who was driving a blue 2013 BMW sedan, park in a vacant lot located east of the Jackson drug spot. LOGAN exited the driver’s seat and entered the front of 3927 West Jackson Boulevard. Moments later, LEOs observed LOGAN exit the front of 3927 West Jackson

Boulevard and get back in the vehicle. LEOs surveilled LOGAN as he drove to the 3800 block of West Monroe Street. At that time, LEOs observed LOGAN exit the vehicle, walk behind the residence located at 3819 West Monroe Street and climb the rear stairs. Minutes later, at approximately 3:23 p.m., LEOs observed LOGAN exit the front of 3819 West Monroe Street, meet with DORNELL WILLIAMS, and walk towards the blue 2013 BMW sedan. After a brief conversation, LOGAN entered the driver's seat of the blue 2013 BMW sedan and DORNELL WILLIAMS entered the front passenger seat. About a minute later, LEOs observed DORNELL WILLIAMS exit the front passenger seat and enter the front of 3819 West Monroe Street. At that time, the blue 2013 BMW sedan departed west on Monroe Street and out of view of law enforcement.

66. About a minute later, at approximately 3:26 p.m., using a pole camera, LEOs observed DORNELL WILLIAMS exit the front of 3819 West Monroe Street, with a visible bulge in the front waistline area of his jacket, enter the driver's seat of a black Hyundai sedan and drive west on Monroe Street. When the black Hyundai sedan turned south onto Springfield Avenue, two unmarked enforcement vehicles conducted a traffic stop on the black Hyundai sedan. LEOs observed that DORNELL WILLIAMS was the sole occupant of the black Hyundai sedan.

67. LEOs recovered two large black plastic bags from under DORNELL WILLIAMS' front jacket pocket. The two large black plastic bags had an approximate gross weight of 733.96 grams. The large black plastic bags contained many smaller Ziplock baggies with flowers and faces on them, each of which contained an off-

white/tan powder, suspect heroin. Some of the smaller Ziplock baggies were rubber banded together in groups of 15, while others were separated with broken rubber bands at the bottom of the bag. Thirty of the smaller Ziplock baggies were tested and determined to be a mixture of 30.21 grams of heroin and fentanyl.

68. DORNELL WILLIAMS was advised of his *Miranda* rights, waived those rights, and agreed to speak to LEOs. During the interview, DORNELL WILLIAMS stated he paid “VONTAY”¹⁷ \$1,800 for two bundles of heroin. DORNELL WILLIAMS stated that he met with LOGAN three to four times per week to retrieve a supply of narcotics to deliver to the 3900 block of West Jackson Boulevard. DORNELL WILLIAMS stated he received \$300-\$400 per delivery.

69. During the interview, LEOs asked DORNELL WILLIAMS if he could provide LEOs with information regarding firearms. DORNELL WILLIAMS told LEOs that he had observed a gun inside the residence located at 3912 West Jackson Boulevard. Based on the above information, LEOs arranged with DORNELL WILLIAMS to recover the gun. Between approximately 6:12 p.m. and 6:24 p.m., in LEOs’ presence, DORNELL WILLIAMS exchanged several phone calls with a contact

¹⁷ During the interview, LEOs showed DORNELL WILLIAMS a photograph of DEVONTAY LOGAN. DORNELL WILLIAMS confirmed that LOGAN was the individual he knows as “VONTAY”.

listed as “Jo Jo,”¹⁸ during which DORNELL WILLIAMS directed “Jo Jo” to place a gun in the alley which law enforcement later recovered.¹⁹

C. MARQUIS JONES and JARELLE JONES Managed the Jackson and Van Buren Drug Spots

70. In summary, and as set forth in more detail below, JARELLE JONES is a shift manager for the Jackson drug spot, and was a former shift manager helping to operate the Van Buren drug spot. MARQUIS JONES was a former shift manager for the Jackson drug spot and is currently a shift manager for the Van Buren drug spot.

1. September 23, 2021 - JARELLE JONES, MARQUIS JONES, and DEVONTAY LOGAN Coordinated to Resupply the Drug Spot

71. In summary, and as set forth in more detail below, MARQUIS JONES, and JARELLE JONES discussed the supply of narcotics at the Jackson drug spot. When the supply ran low, JARELLE JONES collected narcotics proceeds, while MARQUIS JONES called LOGAN to arrange for a resupply. LOGAN delivered an additional supply of narcotics for resale to MARQUIS JONES, who then delivered the narcotics supply to the Jackson drug spot.

72. On or about September 23, 2021, at approximately 9:25 a.m. (September 8, 2021 Order, session #1845), JARELLE JONES received an incoming call on Target

¹⁸ During the interview, DORNELL WILLIAMS was shown a photograph of JOSEPH WILLIAMS, also known as Jo Jo, but claimed he did not know the individual in the image. LEOs believe this information is false, based on other interactions law enforcement is aware of between JOSEPH WILLIAMS and DORNELL WILLIAMS, such as the call described above, February 24, 2022 Order, session #5666.

¹⁹ Law enforcement transported the 9mm rifle to the CBP laboratory for fingerprinting analysis. The results are pending.

Phone 3 from MARQUIS JONES, who was using Target Phone 4. During the conversation, MARQUIS JONES asked, "How many pack [of heroin] you got left?" JARELLE JONES asked, "How many packs I got left?" MARQUIS JONES replied, "Yeah." JARELLE JONES stated, "Not a lot. I got...seven. Well, I got four out there [four currently being sold by the pack workers at the drug spot and three in the stash house]." Later in the conversation, MARQUIS JONES asked, "You said you got seven?" JARELLE JONES replied, "Yeah. Yeah, but they [pack workers] should be done with the four and shit. They got a small team out there." MARQUIS JONES stated, "Aight."

73. Based on the intercepted calls described above, my training and experience, and my knowledge of the investigation, in this call, JARELLE JONES, informed MARQUIS JONES that the supply of narcotics at the stash house located at the Jackson drug spot was running low.

74. At approximately 11:11 a.m. (September 8, 2021 Order, session #1851), JARELLE JONES received an incoming call on Target Phone 3 from MARQUIS JONES, who was using Target Phone 4. During the conversation, MARQUIS JONES stated, "Count that shit [narcotics proceeds] up." JARELLE JONES stated, "I'm already doing it. MARQUIS JONES asked, "What?" JARELLE JONES repeated, "I'm already doing it." Based on the conversation described above, my knowledge of the investigation, and my training and experience, MARQUIS JONES directed JARELLE JONES to consolidate the narcotics proceeds prior to delivering them to LOGAN.

75. Several minutes later, at approximately 11:19 a.m., (September 8, 2021 Order, session #1853), JARELLE JONES placed an outgoing call using Target Phone 3 to MARQUIS JONES, who was using Target Phone 4. During the conversation, JARELLE JONES stated, “Yeah that shit counted up.” MARQUIS JONES stated, “Aight. I already called him [LOGAN].” Based on the intercepted calls described above and below, JARELLE JONES told MARQUIS JONES that he had collected the narcotics proceeds and MARQUIS JONES stated that he had called LOGAN to obtain additional narcotics.

76. At approximately 11:28 a.m. (September 8, 2021 Order, session #1855), JARELLE JONES received an incoming call on Target Phone 3 from an unidentified male (UM-0738). During the conversation, UM-0738 asked, “Yo. Motherfuckers ready to go home shorty?” JARELLE JONES asked, “You said who?” UM-0738 stated, “Motherfuckers asking we can go home.” JARELLE JONES stated, “Hell no, boy. That shit ain’t over with. The fucks you talking about? I said tree up [stand security] and when the drug come, I’ll hit you.” UM-0738 asked, “What you say, shorty?” JARELLE JONES stated, “I said, I said tree up, so when the drugs come out, I’ll hit you.” UM-0738 stated, “Aight.” Based on the intercepted call described above and surveillance, JARELLE JONES directed UM-0738 to tell the pack workers they needed to stay, because more drugs were being delivered, and they had to provide security for an anticipated narcotics delivery.

77. Two minutes later, at approximately 11:30 a.m., using a pole camera, LEOs observed a blue Chevrolet Malibu arrive and park in a vacant lot on the 3900

block of West Jackson Boulevard. At that time, LOGAN exited the driver's seat and opened the hood. MARQUIS JONES approached the front of the blue Chevrolet Malibu, retrieved an unknown item from the engine compartment and concealed the item in the front pocket of his sweater. MARQUIS JONES then ran to the rear yard behind 3927 West Jackson Boulevard and climbed the exterior stairs up to the second-floor residence.

78. At approximately 11:32 a.m. (September 8, 2021 Order, session #1856), JARELLE JONES received an incoming call on Target Phone 3 from MARQUIS JONES, who was using Target Phone 4. During the conversation, MARQUIS JONES stated, "Open the door." JARELLE JONES stated, "Aight."

79. Based on the intercepted calls described above, surveillance, my knowledge of the investigation and my training and experience, LOGAN delivered an additional supply of narcotics for resale to MARQUIS JONES in exchange for narcotics proceeds, MARQUIS JONES delivered the narcotics to JARELLE JONES who was inside the stash house located at 3927 West Jackson Boulevard.

2. November 3, 2021 - MARQUIS JONES and JARELLE JONES Discussed Opening a New Drug Spot Under the Direction of EVANS

80. In summary, and as set forth in more detail below, in November 2021, EVANS instructed JARELLE JONES to open and oversee a new drug spot near West Van Buren Street and South Pulaski Road (the Van Buren drug spot).

81. On or about November 3, 2021, at approximately 3:52 p.m. (November 2, 2021 Order, session #5021), MARQUIS JONES placed an outgoing call on Target

Phone 4 to JARELLE JONES, who was using Target Phone 3. During the conversation, JARELLE JONES stated, "I had to talk to Twin today, yeah yeah." MARQUIS JONES asked, "What he do?" JARELLE JONES replied, "Head [EVANS] or Twin aint know what was going on. Apparently trying to make it seem like we short work [drugs]. He said he said that we (unintelligible) hotel. He's the only one that get it. So we still working right now, [Individual F] is still working right now. I'm just looking at everyone dope, but Head [EVANS] just said, 'when it's time, I'm just going to get y'all bundles [narcotics]....but make sure you please go open up Van Buren tomorrow, please [unintelligible].'). But moral of the story I'm waiting on Head [EVANS]." Later in the call, JARELLE JONES said, "I was on the phone with Twin for like a good thirty forty minutes. He said (unintelligible) he going to give you [JARELLE JONES] the job [on] Van Buren. He said, he said, he make sure I'm going have my own (unintelligible) I just can't drop the ball over there. He say if Vtay [LOGAN] really is doing that [taking narcotics proceeds] if Jackson gone back and Van Buren going to take off and we going to know. I told him all right, bet, but then I told Bro [EVANS] like that still seems like some type of (unintelligible) cause basically he don't even care about Jackson he don't even care about those joints, and in actuality, we going to pick Van Buren up. I said, he gonna let Vtay [LOGAN] ... Then Bro [EVANS] be like ... Bro I'm finna just go get y'all some bundles. Everybody making my head hurt. He like, 'man, just work Jackson and just work Van Buren. Just work both of those joints damn man ya'll ass crazy as hell.'"

82. Based on my training and experience, my knowledge of the investigation, and the intercepted call described above, JARELLE JONES told MARQUIS JONES that EVANS instructed JARELLE JONES to open and oversee a new drug spot near West Van Buren Street and South Pulaski Road (the Van Buren drug spot). Further, I believe that JARELLE JONES told MARQUIS JONES that member of the EVANS DTO will be able to determine if LOGAN is stealing narcotics proceeds from the Jackson drug spot if the narcotics sales at the Van Buren drug spot are more successful than the Jackson drug spot because LOGAN does not regularly deliver narcotics to or collect narcotics proceeds from the Van Buren drug spot.

3. November 6, 2021 - JARELLE JONES Opens the Van Buren Drug Spot

83. In summary, and as set forth in more detail below, on or about November 6, 2021, JARELLE JONES directed other co-conspirators regarding the opening of the Van Buren drug spot, including by conducting a “pass out,” a free narcotics sample distributed to narcotics customers when a new drug spot is opened. Later that same day, JARELLE JONES discussed how narcotics sales were going at the Van Buren drug spot and explained the drug spot had already sold five packs of narcotics.

84. On or about November 6, 2021, at approximately 12:21 p.m., (November 2, 2021 Order, session #5577), JARELLE JONES placed an outgoing call using Target Phone 3 to Individual G, who was using telephone number (XXX) XXX-4822. During the conversation, JARELLE JONES stated, “Yeah, I’m finna open up Van Buren [the

new Van Buren drug spot], so I'm gonna need you to do this pass out for me." Individual G responded, "Alright."

85. Based on law enforcement surveillance, my training and experience, and the training and experience of other law enforcement officers with whom I have spoken, that during the communications described above, JARELLE JONES instructed Individual G to pass out free narcotics at the Van Buren drug spot in order to attract customers.

86. On or about November 6, 2021 at approximately 2:13 p.m., (November 2, 2021 Order, session #5596), JARELLE JONES placed an outgoing call using Target Phone 3 to Individual G, who was using telephone number (XXX) XXX-4822. During the conversation, JARELLE JONES asked, "Yeah, what it look like out there?" Individual G stated, "It's building up, it's building up... Hello?" Later in the conversation Individual G stated, "It's building up. What kind of number you looking for so I know?" JARELLE JONES stated, "I'm looking for like 20-25." Later in the conversation, JARELLE JONES stated, "Let them know that we're just waiting for more people to come, that's what we're waiting on." Individual G stated, "Hey! Let me put you on speaker so I can let them hear it. Alright come on, we're just waiting on a few more people." JARELLE JONES responded, "Here I come."

87. Based on my training and experience, and the training and experience of other law enforcement officers with whom I have spoken, that during the communications described above, JARELLE JONES instructed Individual G to

gather 20-25 narcotics customers for the pass out. Individual G informed the narcotics customers that he [JARELLE JONES] was on the way to complete the pass out.

88. On or about November 6, 2021, at approximately 10:05 p.m. (November 2, 2021 Order, session #5696), JARELLE JONES placed an outgoing call using Target Phone 3 to UM-9690, who was using telephone number (XXX) XXX-9690. During the conversation, JARELLE JONES stated, "I was just with all the old ass Four Corner Hustlers, we was having a goal [a meeting]. Fucking goofy." Later in the conversation, JARELLE JONES stated, "On my dead, imma stay right there, cause y'all really just really fire me basically to go, go open up Van Buren [the new Van Buren drug spot] basically..." Later in the conversation, JARELLE JONES stated, "Boy on my dead, I'm in that bitch, I did five packs [referring to the sale of narcotics] today." UM-9690 stated, "Oh yeah, that's thorough." JARELLE JONES stated, "Boy, that bitch great." UM-9690 asked, "Damn, and that's for, it's just now starting up?" JARELLE JONES stated, "Boy, I did that, and I did a pass [narcotics pass out] at like 2 pm, 2:30 pm, and we did 5 packs already. That 500 in like less than fucking 12 hours." UM-9690 stated, "Yeah, it gets no better than that. That's what I'm telling you, that's thorough."

89. Based on my knowledge of the investigation and my training and experience, that during the communications described above, JARELLE JONES told UM-9690 about a meeting between him [JARELLE JONES] and the older Four Corner Hustlers, during which the new Van Buren drug spot was discussed.

JARELLE JONES stated that the new drug spot had sold 5 packs of narcotics that day.

4. March 3, 2022 - MARQUIS JONES Resupplied the Van Buren Drug Spot

90. In summary, on or about March 3, 2022, MARQUIS JONES contacted JOSEPH WILLIAMS for additional narcotics to resupply the Van Buren drug spot. MARQUIS JONES retrieved a supply of narcotics from JOSEPH WILLIAMS at the stash house located at 3912 West Jackson Boulevard, and delivered the narcotics to the Van Buren drug spot.

91. On or about March 3, 2022, at approximately 10:38 p.m., using a pole camera, LEOs observed multiple hand-to-hand narcotics transactions in the alley at the Van Buren drug spot. Between approximately 10:39 p.m. and 10:52 p.m., LEOs observed no narcotics related sales occurring at the Van Buren drug spot. Based on the surveillance described above and below, my knowledge of the investigation, and my training and experience, the supply of narcotics at the Van Buren drug spot was running low.

92. On that same date, at approximately 10:48 p.m. (February 24, 2022 Order, session #5009), JOSEPH WILLIAMS received an incoming call on Target Phone 6 from MARQUIS JONES, who was using Target Phone 4. During the conversation, MARQUIS JONES stated, "You can bring that [narcotics] out." JOSEPH WILLIAMS replied, "Oh." MARQUIS JONES stated, "Come on. Pulling up." JOSEPH WILLIAMS asked, "Where you at?" MARQUIS JONES replied, "About to pull in the front right now."

93. About a minute later, at approximately 10:49 p.m., using a pole camera, LEOs observed MARQUIS JONES enter the front of 3912 West Jackson Boulevard. Approximately one minute later, LEOs observed MARQUIS JONES exit the front of 3912 West Jackson Boulevard with a large bulge in the front of his sweater pocket, enter the front driver's seat of a blue Chevrolet Malibu, and depart the area.

94. At approximately 10:52 p.m., using a pole camera, LEOs observed MARQUIS JONES arrive and park in front of the Van Buren drug spot. An unidentified male (UM1) approached the passenger side of the Chevrolet Malibu, reached inside the front passenger window, and retrieve a black plastic bag. UM1 then ran inside the front of 3953 West Van Buren Street with the black plastic bag.

95. At approximately 10:53 p.m., using a pole camera, LEOs observed a suspected hand-to-hand narcotics transaction in the alley at the Van Buren drug spot. Based on the surveillance and intercepted call described above, my knowledge of the investigation and my training and experience, the supply of narcotics at the Van Buren drug spot was running low and MARQUIS JONES contacted JOSEPH WILLIAMS for additional narcotics to resupply the Van Buren drug spot. Further, MARQUIS JONES retrieved a supply of narcotics from JOSEPH WILLIAMS at the preliminary stash house located at 3912 West Jackson Boulevard and delivered the narcotics to the Van Buren drug spot.

5. April 12, 2022 - MARQUIS JONES Picked Up Narcotics from JOSEPH WILLIAMS at EVANS' Direction

96. In summary, and as set forth in more detail below, on or about April 12, 2022, MARQUIS JONES, at EVANS' direction, retrieved a supply of narcotics from

JOSEPH WILLIAMS at the stash house located at 3912 West Jackson Boulevard and provided the narcotics to an unidentified male, who then delivered the narcotics to the Van Buren drug spot.

97. On or about April 12, 2022, at approximately 7:23 p.m. (March 24, 2022 Order, session #8728), JOSEPH WILLIAMS received an incoming call on Target Phone 6 from MARQUIS JONES, who was using Target Phone 7. During the conversation, MARQUIS JONES asked, “Where you at?” JOSEPH WILLIAMS replied, “On Jackson [3900 block of West Jackson Boulevard].” MARQUIS JONES stated, “Oh. Bro [EVANS] said um, give me a B [bundle of narcotics] and he gonna give it back to you.” JOSEPH WILLIAMS replied, “Aight.”

98. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that MARQUIS JONES explained to JOSEPH WILLIAMS that EVANS directed MARQUIS JONES to retrieve a supply of narcotics from JOSEPH WILLIAMS.

99. Using a pole camera, LEOs observed a white Kia sedan, driven by MARQUIS JONES, arrive and park in front of 3927 West Jackson Boulevard. At approximately that same time, LEOs observed JOSEPH WILLIAMS use a key to enter the front of 3912 West Jackson Boulevard.

100. About ten minutes later, at approximately 7:32 p.m. (March 24, 2022 Order, session #8732), JOSEPH WILLIAMS placed an outgoing call using Target Phone 6 to MARQUIS JONES, who was using Target Phone 7. During the conversation, MARQUIS JONES asked, “Where you at?” JOSEPH WILLIAMS

replied, "I'm in the crib. Where you at?" Later in the conversation, MARQUIS JONES said, "I'm out front." JOSEPH WILLIAMS stated, "Aight hold on. I'ma throw the key down."

101. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that MARQUIS JONES contacted JOSEPH WILLIAMS to retrieve a supply of narcotics and JOSEPH WILLIAMS stated that he would throw the key from his residence for MARQUIS JONES to gain entry inside the preliminary stash house located at 3912 West Jackson Boulevard.

102. About a minute later, at approximately 7:33 p.m., LEOs observed MARQUIS JONES walk to the front of 3912 West Jackson Boulevard. An unidentified individual opened the door from inside the building allowing MARQUIS JONES to enter. Less than a minute later, LEOs observed MARQUIS JONES exit the front of 3912 West Jackson Boulevard with a bulge in the front of his sweater pocket, enter the driver's seat of the white Kia sedan, and depart the area. LEOs followed the white Kia sedan until it arrived and stopped in the alley behind 3953 West Van Buren Street. At that time, an unidentified male (UM2) exited the passenger seat of the white Kia sedan, walked towards the building located at 3953 West Van Buren Street, and threw an unknown item over the gate behind the building.

103. Based on the intercepted calls and surveillance described above, my knowledge of the investigation and my training and experience, I believe that the

supply of narcotics at the Van Buren drug spot was running low and MARQUIS JONES, with EVANS' permission, retrieved a supply of narcotics from JOSEPH WILLIAMS at the preliminary stash house located at 3912 West Jackson Boulevard. Further, I believe that MARQUIS JONES provided the narcotics to UM2 inside the white Kia sedan, who then delivered the narcotics to the Van Buren drug spot.

D. JOSEPH WILLIAMS Managed the Jackson Drug Spot

104. JOSEPH WILLIAMS managed the Jackson drug spot, met with the narcotics suppliers, including LOGAN and EVANS, to resupply the Jackson drug spot, delivered narcotics supplies to a stash house located at 3912 West Jackson Boulevard, and transferred narcotics to other members of the EVANS DTO, including MARQUIS JONES.

1. October 20, 2021 - Sale of Narcotics by JOSEPH WILLIAMS and ANTONIO FLETCHER

105. In summary, on October 20, 2021, JOSEPH WILLIAMS, using Subject Phone 16,²⁰ arranged to sell heroin to an undercover officer (UC6). Ultimately, JOSEPH WILLIAMS directed ANTONIO FLETCHER to sell the heroin to UC6, and told UC6 that he would have FLETCHER deliver the heroin to UC6 so UC6 could avoid police activity near the Jackson drug spot.

106. On or about October 20, 2021, between approximately 1:07 p.m. and 2:13 p.m., UC6 placed a series of consensually recorded telephone calls to JOSEPH

²⁰ Law enforcement identified JOSEPH WILLIAMS as the user of Subject Phone 16 based on the following information: On or about October 19, 2021, an undercover officer, posing as a narcotics customer ("UC6"), made a controlled purchase of narcotics from WILLIAMS. During a brief conversation, UC6 asked WILLIAMS for his telephone number for the purpose of facilitating future narcotics transactions. WILLIAMS provided Subject Phone 16.

WILLIAMS, who was using Subject Phone 16, to arrange a purchase of heroin. At approximately 1:07 p.m., during the conversation, UC6 stated, “Yo, I’m about to get off the expressway in five.” JOSEPH WILLIAMS replied, “Huh?” UC6 stated, “I’m about to get off the expressway in five.” JOSEPH WILLIAMS asked, “In five minutes?” UC6 replied, “Yeah.” JOSEPH WILLIAMS stated, “Alright I’m right here [the Jackson drug spot], standing right here.” Based on the conversation described above, I believe UC6 informed JOSEPH WILLIAMS that he/she was five minutes away from exiting the expressway on the way to the drug spot at 3927 West Jackson Boulevard, and that JOSEPH WILLIAMS indicated to UC6 that he would be waiting to meet UC6 to conduct the narcotics transaction.

107. At approximately 1:19 p.m., UC6, who was equipped with an audio and video recording device, drove to the 3900 block of West Jackson Boulevard. Based on review of the recording captured by the device worn by UC6 and according to UC6, at approximately 1:19 p.m., UC6 exited his/her vehicle and walked to the front of 3927 West Jackson Boulevard and met with JOSEPH WILLIAMS. JOSEPH WILLIAMS told UC6 that he was going to get the narcotics. At that time, JOSEPH WILLIAMS entered the front of 3927 West Jackson Boulevard, while UC6 waited on the sidewalk.

108. A few minutes later, at approximately 1:22 p.m., JOSEPH WILLIAMS exited the front of 3927 West Jackson Boulevard and told UC6 that he/she had to wait because they did not have any full “packs.” Based on the information described above and below, my knowledge of the investigation and my training and experience, that the supply of narcotics at the stash house located at 3927 West Jackson

Boulevard was low and JOSEPH WILLIAMS was waiting for the delivery of additional narcotics to sell to UC6, which were later provided by FLETCHER.

109. At approximately 1:24 p.m., UC6 placed an outgoing telephone call to JOSEPH WILLIAMS, who was using Subject Phone 16. During the conversation, UC6 asked, "Hey, how much longer you thinking, man? I don't want to get served by any..." JOSEPH WILLIAMS stated, "He [a narcotics associate] finna come right down. He finna come right down." Based on the conversation described above, UC6 asked JOSEPH WILLIAMS how much longer he/she had to wait, and JOSEPH WILLIAMS indicated that he was sending a narcotics associate to meet UC6. At approximately 1:32 p.m. UC6 departed the area.

110. At approximately 1:47 p.m., UC6 placed an outgoing telephone call to JOSEPH WILLIAMS, who was using Subject Phone 16. UC6 asked, "Yo you want me to wait around man, I had to leave because all those police, what the fuck happened?" JOSEPH WILLIAMS replied, "Hey where you at, I'm finna have you meet me somewhere, I'm finna have you meet me down the street." JOSEPH WILLIAMS instructed UC6 to wait at the intersection near Karlov and Pulaski to avoid law enforcement activity near the Jackson drug spot.

111. Once parked, at approximately 2:04 p.m., UC6 placed an outgoing phone call to JOSEPH WILLIAMS, who was using Subject Phone 16. During the conversation, JOSEPH WILLIAMS instructed UC6 to stay there and that he was coming. At approximately 2:13 p.m., JOSEPH WILLIAMS informed UC6 that "it" [the narcotics] was coming out. Approximately two minutes later, at or about 2:15 p.m.,

JOSEPH WILLIAMS and FLETCHER walked up to UC6's vehicle. FLETCHER handed UC6 approximately 30 smaller Ziplock baggies of suspect heroin in exchange for \$240 from UC6. Eighteen of the 30 smaller Ziplock baggies were tested and determined to contain 15.4 grams of heroin. According to UC6 and review of audio and videorecordings, FLETCHER stated, "He [UC6] know me I just served him the other day." UC6 replied, "What's up brother? You over here [the Jackson drug spot]?" FLETCHER replied, "Yeah that's my brother [referring to JOSEPH WILLIAMS]." UC6 stated, "This [the Jackson drug spot] what you told me to come to." FLETCHER stated, "It don't matter you call me over here." JOSEPH WILLIAMS added, "With you [UC6], I'm just gonna have you get up with him [FLETCHER] so you don't have to go to that hot ass strip [the Jackson drug spot]."

112. Based on the conversation described above, my knowledge of the investigation, and my training and experience, JOSEPH WILLIAMS instructed UC6 to contact FLETCHER to coordinate future narcotics transactions to avoid police activity near the Jackson drug spot. As described below, UC6 later purchased additional narcotics from FLETCHER at 4041 West Jackson Avenue.

113. On or about December 5, 2021, UC6 exchanged a series of consensually recorded text messages and phone calls with FLETCHER, who was using telephone number (XXX) XXX-9942 (Subject Phone 19).²¹ At approximately 8:35 a.m., FLETCHER texted UC6, "Whats time." UC6 texted, "Heading ur way."

²¹ On or about October 20, 2021, ANTONIO FLETCHER provided UC1 with FLETCHER's cell phone number, (XXX) XXX-9942, Subject Phone 19, as a means for UC1 to use to contact FLETCHER. After

114. At approximately 9:45 a.m., UC2 and UC6 arrived in their vehicle and parked in the alley behind 4041 West Jackson Boulevard. Moments later, FLETCHER approached the front driver's side window of the UCs' vehicle and directed UC2 and UC6 to park in the empty parking space behind 4041 West Jackson Boulevard. At that time, UC6 exited the driver's seat of his/her vehicle and approached FLETCHER. During the conversation, FLETCHER informed UC6 that FLETCHER had nine packs of heroin to sell UC6. UC6 replied, "I want it all at once." FLETCHER directed UC6 to wait inside the UCV until FLETCHER retrieved additional narcotics from inside the residence located at 4041 West Jackson Boulevard. FLETCHER entered the rear door of the residence located at 4041 West Jackson Boulevard and shortly later, at approximately 9:50 a.m., FLETCHER exited the rear of 4041 West Jackson Boulevard and approached the driver's side of UC2 and UC6's vehicle. At that time, FLETCHER handed UC6 approximately 164 smaller Ziplock baggies with yellow smiley faces on them, each containing a white powdery substance, suspect heroin, in exchange for \$1,320. The contents of the 164 smaller Ziplock baggies with yellow smiley faces on them weighed 152.4 grams of which 16.7 grams were tested and tested positive for fentanyl and heroin.

2. April 6, 2022 - JOSEPH WILLIAMS Delivered Proceeds to LOGAN and Was Resupplied with Narcotics

115. In summary, and as set forth in more detail below, on or about April 6, 2022, DEVONTAY LOGAN collected narcotics proceeds from JOSEPH WILLIAMS.

UC1 received the phone number UC1 dialed the number for Subject Phone 19 and FLETCHER confirmed the call went through to FLETCHER's phone.

Then LOGAN met with EVANS to obtain additional supplies of narcotics and delivered those narcotics to the stash house located at 3912 West Jackson Boulevard. JOSEPH WILLIAMS later delivered narcotics from 3912 West Jackson Boulevard to the Jackson drug spot.

116. On or about April 6, 2022, at approximately 1:49 p.m. (March 24, 2022 Order, session #8140), JOSEPH WILLIAMS received an incoming call on Target Phone 6 from an unidentified female (UF-1785), who was using telephone number (XXX) XXX-1785. During the conversation, JOSEPH WILLIAMS stated, "... I'm waiting on Vontay [LOGAN] to call me." UF-1785 asked, "You'll take some [narcotics] out for later?" JOSEPH WILLIAMS replied, "Yeah."

117. At approximately, 2:17 p.m., using a pole camera, LEOs observed a white Jeep Grand Cherokee arrive and park across the street from 3927 West Jackson Boulevard. At that time, LOGAN exited the driver's seat and walked across the street and waited on the sidewalk in front of 3927 West Jackson Boulevard.

118. About a minute later, using a pole camera, LEOs observed JOSEPH WILLIAMS exit the front of 3912 West Jackson Boulevard and enter the front passenger seat of the white Jeep Grand Cherokee. Seconds later, JOSEPH WILLIAMS exited the passenger seat and LOGAN entered the driver's seat and departed the area.

119. At approximately, 3:06 p.m., using a pole camera, LEOs again observed the white Jeep Grand Cherokee. This time it parked behind 3912 West Jackson Boulevard. At that time, LOGAN exited the driver's seat, removed an unknown item

from underneath the hood of the vehicle, and walked into the gangway behind 3912 West Jackson Boulevard. Seconds later, LOGAN returned to the driver's seat of the white Jeep Grand Cherokee and departed the area.

120. At approximately 3:15 p.m., using a pole camera, LEOs observed JOSEPH WILLIAMS exit the front of 3912 West Jackson Boulevard with a large bulge in the front of his sweater pocket, run across the street, and enter the front of 3927 West Jackson Boulevard.

121. Based on the intercepted call described above, surveillance, my knowledge of the investigation, and my training and experience, I believe that JOSEPH WILLIAMS informed UF-1785 that he was waiting on LOGAN's phone call to deliver a supply of narcotics. Additionally, I believe that LOGAN first visited the Jackson drug spot to collect narcotics proceeds, and JOSEPH WILLIAMS later delivered the narcotics provided by LOGAN from 3912 West Jackson Boulevard to the Jackson drug spot.

E. Seizure of Stash House Narcotics

1. March 25, 2022 - Search Warrant at the EVANS DTO Stash House at 3650 West Chicago Avenue, and Seizure of Narcotics, Money, and Firearms

122. As described above, on or about March 25, 2022, at approximately 9:30 p.m., law enforcement executed search warrant 22 M 218 at the stash house used by the EVANS DTO at 3650 West Chicago Avenue, 2 Rear.

On the evening of March 25, 2022, prior to execution of the warrant, LEOs observed EVANS entering the stash house. At approximately 8:46 p.m., LEOs, using a pole

camera, observed EVANS arrive and park near 3650 West Chicago Avenue, exit his vehicle, and use keys to enter 3650 West Chicago Avenue 2 Rear (the stash house). As law enforcement approached and entered the residence to execute the search warrant, several individuals fled. One individual was detained by LEOs in a hallway as he fled, but he declined to speak with law enforcement. Law enforcement searched the unit and recovered items consistent with the storage, packaging, and distribution of narcotics. For example, in one room, law enforcement observed four collapsible tables with three chairs. On the tables were money counters, scales, empty smaller Ziplock bags, smaller Ziplock bags containing suspect heroin, blenders, and approximately 16 cellular phones. Law enforcement seized \$58,360, a money counter, a gross weight of approximately 4.62 kilograms of suspect heroin, of which 156.67 grams were tested and determined to be heroin, a gross weight of approximately 4.16 kilograms of suspect cocaine, a gross weight of approximately 80.12 grams of suspect marijuana, one AK-47 rifle, one MAC-10 submachine gun with suppressor, one Taurus handgun with a high-capacity magazine, one Kahr 9mm handgun and over 450 rounds of various ammunition, scales, blenders, and other tools used to process and package narcotics, and substances used to dilute or cut heroin, approximately 17 cell phones, including Target Phone 5, and over 450 rounds of ammunition. The narcotics, and narcotics packaging equipment, found in the stash house consistent with how the EVANS DTO packaged narcotics, namely, suspect heroin packaged in smaller Ziplock baggies, bundles of smaller Ziplock baggies, and black plastic bags

containing bundles of smaller Ziplock baggies containing suspect heroin. Photographs of the packaged suspect heroin are below:



123. In addition, tools used for mixing and cutting heroin were also found, including suspect heroin in a blender and a shifter, as depicted below, as well as large quantities of Dormin [containers], which is a common cutting agent for heroin:



124. Two are the firearms recovered in the stash house, an AK-47 type rifle (left) and one MAC-10 submachine gun with suppressor (right) are depicted below:



2. After the Search Warrant and Seizure of Narcotics from the Stash House at 3650 West Chicago Avenue, on March 30, 2022, JOSEPH WILLIAMS Discussed the Low Supply of Narcotics

125. On or about March 30, 2022, at approximately 10:12 a.m. (March 24, 2022 Order, session #7634), JOSEPH WILLIAMS received an incoming call on Target Phone 6 from Individual H. During the conversation, Individual H asked, "Hey you ain't got nothing [narcotics]?" JOSEPH WILLIAMS replied, "No, I ain't, I ain't got nothing else right now. I'm...Tunchie [MARQUIS JONES] and them don't give a mother fucker some "C" [cocaine] so, I don't know man. I'm just..." Later in the conversation, Individual H stated, "No what I'm saying is you gotta, when you talk to dude and them [the suppliers], let them know, like y'all want us to not do nothing and what y'all want us to let them keep coming over here and taking the "P's" [customers'] money and they steady sending the "P's" to Gladys [another drug spot on the 3900 block of West Gladys Avenue] and all these other joints [drug spots] and shit. What do they expect us to do?" JOSEPH WILLIAMS replied, "I don't know." Individual H stated, "I don't get this shit, bro. This shit confusing, bro. They just robbed two of the "P's" right here bro, already bro. Like what the [unintelligible] I don't even know what to do, like should I jump out and [unintelligible] a mother fucker?" JOSEPH WILLIAMS stated, "How you going to steal on somebody and the mother fucker got y'all in the dark. Like a mother fucker got us in the dark so what is we doing all that for? Why do you think I'm in my car right now, I'm not doing all that and a mother fucker got me in the dark, and a mother fucker called me last night and told me they was finna bust a move [deliver narcotics], give me some "C" [cocaine]

but mother fucker never called me back, so, when the mother fucker never called me back, you know what I said, fuck em.” Individual H stated, “So we been hearing this shit four days now, bro.” JOSEPH WILLIAMS stated, “Exactly.” Individual H stated, “Holler at them people, bro. Tell em something gotta give, bro. Like none of this shit make sense right now.”

126. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that Individual H contacted JOSEPH WILLIAMS for a resupply of additional narcotics for resale. JOSEPH WILLIAMS stated that he did not have any narcotics and further explained that MARQUIS JONES, who is a street manager for the Van Buren drug spot, was not sharing any of his supply of narcotics. Further, JOSEPH WILLIAMS and Individual H expressed their frustrations that their leadership has been instructing them to sell narcotics while the supply of narcotics was low. Later in the conversation, JOSEPH WILLIAMS stated that he was waiting on a narcotics supplier to deliver him narcotics that was ultimately never delivered. Lastly, Individual H described that they have been low on narcotics supplies for four days. At the time of the call described above, approximately four days had elapsed since LEOs executed a federal search warrant at the EVANS DTO stash house located at 3650 West Chicago Avenue.

F. TEREMIUS WEBB Sold Narcotics at the Jackson Spot and Worked as a Shift Manager at the Van Buren Drug Spot

127. During this investigation, LEOs identified WEBB as a street level dealer for the EVANS DTO at the Jackson drug spot, who later worked as a shift manager at the Van Buren drug spot.

1. May 8-9, 2021 - WEBB Reported to LOGAN Regarding Narcotics Proceeds

128. On or about May 8, 2021, at approximately 10:53 a.m., (May 5, 2021 Order, session #1078) TEREMIUS WEBB²², who was using Target Phone 1, received an incoming call from LOGAN, who was using Target Phone 2. LOGAN asked, “Why you ain't give me that last count [narcotics proceeds] first?” WEBB replied, “What you mean? He...Tavo said he gave it to you when you was shooting dice.” LOGAN then stated, “Bro, stop playing with me. Y'all got me fucked up, bro. Y'all had two [bundles of heroin], bro. Stop playing with me.” In what appeared to be a side conversation, WEBB stated, “Tell him then.” An unknown male (UM3) then began speaking on Target Phone 1. UM1 stated, “Hello?” LOGAN stated, “Hello?” UM3 stated, “I should've never even...never played, went to the afterhours...” LOGAN stated, “Bro, you ain't give me no two counts [narcotics proceeds from two bundles of narcotics],

²² Law enforcement identified TEREMIUS WEBB as the user of Target Phone 1 as follows: on or about April 3, 2021, UC1 made a controlled purchase of narcotics from WEBB at the Jackson drug spot. Law enforcement identified WEBB based on comparison to his State of Illinois ID photograph. UC1 was approached by WEBB who asked, “Well, come on. You want some blows [heroin] or no...?” After the transaction, WEBB provided UC1 with his cell phone number, Target Phone 1 and told UC1 to save the phone number under the name “Peanut.” Additionally, on or about May 11, 2021, at approximately 1:12 p.m., LEOs conducted an investigatory traffic stop on a vehicle parked in the middle of an alley near 2947 North Keating Avenue. LEOs identified the occupants of the vehicle as WEBB (passenger) and KYLE LINTON (driver). Following the traffic stop, the LEO who spoke to WEBB during the traffic stop listened to call May 5, 2021 Order, session #1208 and identified WEBB as the user of Target Phone 1.

stop playing with me!" UM3 replied, "I ain't give you two counts. What the fuck you talking about two counts? I'm talking about one count." LOGAN stated, "Right, so stop playing with me. Tell 'em stop playing with me. I ain't no shorty. Stop playing with me." In what appeared to be a side conversation, UM3 asked, "What other count you got? The one I just did for you?" A different unknown male (UM4) replied, "Yeah...boy." LOGAN stated, "Icy, why you said he gave it to me. Stop playing. I'm not playing with you, bro." UM3 stated, "...I just woke up and they told me they gave it to you." LOGAN replied, "Bro, y'all got...y'all should have four [\$4,000 in narcotics proceeds] (unintelligible), don't touch that white bag [containing the next bundle of heroin], bro. Don't touch that white bag." UM3 replied, "Alright." Based on my knowledge of the investigation and my training and experience, LOGAN contacted WEBB and the unknown pack workers to discuss the amount of narcotics proceeds that had been previously turned in to LOGAN. Further, LOGAN instructed WEBB and the unknown pack workers to turn in the remaining narcotics proceeds from the first bundle of heroin before selling the next bundle of heroin concealed inside a white bag.

129. On or about May 9, 2021, at approximately 12:45 p.m., (May 5, 2021 Order, session #1116), WEBB, who was using Target Phone 1, received an incoming call from LOGAN, who was using Target Phone 2. During the conversation, WEBB stated, "Uh, I gave the money to [Individual C] and...I wanted to ask you, how many you gave them [UM3 and UM4] last night, one or two [bundles of heroin]?" LOGAN replied, "One, boy." WEBB stated, "...Boy, they getting two. Alright, they almost done

[selling the packs at the drug spot]...alright.” Based on my knowledge of the investigation and my training and experience, WEBB confirmed the amount of heroin that LOGAN had supplied UM3 and UM4 on or about May 8, 2021. Additionally, WEBB told LOGAN that the supply of narcotics inside the stash house located at the Jackson drug spot was running low.

2. April 20, 2021 - Sale of Narcotics by TEREMIUS WEBB

130. In summary, TEREMIUS WEBB sold a UC 45 smaller Ziplock baggies of heroin at the Jackson drug spot.

131. On or about April 7, 2021, an undercover LEO (UC1) exchanged text messages with TEREMIUS WEBB, who was using Target Phone 1. During the text message conversation, UC1 inquired whether WEBB would be prepared to sell narcotics to UC1 on Saturday, April 10, 2021.

132. On or about April 10, 2021, UC1 placed a consensually recorded call to WEBB and explained that UC1 wanted to purchase “three packs,” by which UC1 meant 45 smaller Ziplock baggies of narcotics.

133. Based on a review of the recording captured by the device worn by UC1 and according to UC1, between approximately 11:23 a.m. and 11:31 a.m., UC1 placed approximately four consensually recorded calls to WEBB at Target Phone 1. WEBB directed UC1 to meet him at the Jackson drug spot to conduct the narcotics transaction.

134. At approximately 11:34 a.m., UC1 exited his/her vehicle and walked to the wrought iron gate at the Jackson drug spot. At about the same time, UC1

observed WEBB exit the front of 3927 West Jackson Boulevard. WEBB handed UC1 three rubber-banded packets in exchange for \$500.

135. The three rubber-banded packets contained 45 smaller Ziplock baggies with clubs on them, each containing a white powdery substance. The contents of sixteen of the 45 baggies weighed 45 grams, of which 16 grams were tested and determined to contain mixtures of heroin and fentanyl.

G. KYLE LINTON Sold Narcotics for the DTO at the Jackson Drug Spot

1. November 16, 2021 - Sale of Narcotics by KYLE LINTON at the Jackson Drug Spot

136. In summary, from on or about November 11, 2021, through November 16, 2021, LEOs, including UC1 and UC7, carried on several recorded phone conversations with WEBB and KYLE LINTON to arrange narcotics purchases.

137. On or about November 16, 2021, at approximately 11:25 a.m., during a consensually recorded call, UC1 asked WEBB if UC1 could purchase 10 packs, by which UC1 meant 150 smaller Ziplock baggies of heroin. WEBB stated he did not have 10 packs at that time. UC1 told WEBB to call him back when he had more packs.

138. At approximately 12:49 p.m., during a consensually recorded call, LINTON called UC1 and stated, “Yo, you call my guy T-Roy (WEBB) about trying to get some bags?” UC1 replied, “Yo, yeah, what up, I'm trying to get a bundle [of narcotics]...” LINTON and UC1 then discussed the price for twenty packs of narcotics, and agreed to meet on Jackson Boulevard. UC1 suggested a purchase price

of \$1,200 for 150 smaller Ziplock baggies of heroin. LINTON told UC1 that he would charge UC1 \$2,200 for 20 packs [300 smaller Ziplock baggies of heroin]. UC1 agreed and told LINTON that UC1 was on Madison. LINTON replied, "Come on Jackson [the Jackson drug spot]." UC1 asked, "Aight. You out front?" LINTON replied, "Yeah."

139. At approximately 1:24 p.m., UC1 and UC7 arrived in their undercover vehicle (UCV) at the 3900 block of West Jackson Boulevard. UC1 placed a consensually recorded call to LINTON. During the conversation, UC1 stated, "Hey bro. I'm out front." LINTON replied, "Aight. I don't got it, man." UC1 asked, "What's that?" LINTON replied, "I don't got a whole one [the twenty packs of heroin]." UC1 replied, "You ain't got no whole one? What you got, you hear me?" LINTON stated, "I got eight packs [heroin]." Later in the conversation, UC1 stated, "Aight, what about ah, I'm be out here for a minute. I'll take the eight right now. When do you think you'll have the rest?" LINTON stated, "Ah, like another ten to fifteen minutes." UC1 replied, "Aight, bet. You want me to wait or just do the eight now and then come back?" LINTON stated, "You can grab the eight."

140. Based on the conversation described above, my knowledge of the investigation and my training and experience, I believe that LINTON informed UC1 that during that time, LINTON did not have the entire amount of narcotics that he agreed to sell UC1. LINTON told UC1 that he could sell him eight packs of heroin now and LINTON could sell him the rest later in the day.

141. At approximately 1:28 p.m. UC1 and UC7 parked near 3929 West Jackson Boulevard. UC1 called LINTON and asked how much time it would take LINTON to get 12 more packs. LINTON responded, "This you right here in the black Nissan? Check it out [come look at the narcotics]." UC1 and UC7 exited their UCV and walked over to speak with LINTON at the Jackson drug spot. UC1 and LINTON agreed that LINTON would call UC1 in 30-60 minutes when LINTON expected to have the 12 more packs of heroin to sell UC1.

142. At approximately 3:38 p.m. UC1 received a call from WEBB and during a consensually recorded call, WEBB told UC1 to go to the front gate of the Jackson drug spot.

143. At approximately 3:40 p.m. UC1 met LINTON at the front gate of the Jackson drug spot. UC1 gave LINTON \$1,300 in exchange for 150 smaller yellow tinted Ziplock baggies. The contents of the 150 baggies weighed 157.4 grams of which 15.8 grams were tested and determined to contain mixtures of heroin and fentanyl.

144. Later that same day, at approximately 4:54 p.m., UC1 placed a call to LINTON and during a consensually recorded call, LINTON told UC1 that he would sell UC1 seven additional packs [105 smaller Ziplock baggies of heroin] for \$1000. UC1 returned to the Jackson drug spot and LINTON accepted \$860 in exchange for 105 smaller yellow tinted Ziplock baggies. The contents of the 105 smaller yellow tinted Ziplock baggies weighed 103.3 grams, of which 15.7 grams were tested and determined to be mixtures of heroin and fentanyl. Both narcotics purchases were recorded on audio and video recording devices worn by UCs.

2. November 22, 2021 - Sale of Narcotics by KYLE LINTON

145. In summary, on or about November 22, 2021, WEBB told UCs they could purchase narcotics from WEBB at the Van Buren drug spot and narcotics from LINTON at the Jackson drug spot.

146. On or about November 22, 2021, at approximately 12:27 p.m., UC1 had a consensually recorded conversation with LINTON during which UC1 told LINTON that UC7 wanted to buy “twenty,” by which UC1 meant 300 smaller Ziplock baggies of heroin. LINTON told UC1 to call him [LINTON] when they [the UCs] were close.

147. At approximately 12:40 p.m., UC1 called WEBB and had a consensually recorded conversation during which UC1 also told WEBB that UC7 wanted to buy “twenty,” by which UC1 meant 300 smaller Ziplock baggies of heroin. WEBB told UC1 that he [WEBB] was at the Van Buren drug spot. WEBB explained that WEBB only had ten packs. WEBB further explained that UC7 could buy the first ten packs from WEBB at the Van Buren drug spot and then UC7 could buy the other ten packs from the Jackson drug spot.

148. At approximately 12:53 p.m., UC1 had a consensually recorded conversation with LINTON during which UC1 told LINTON that, according to WEBB, UC7 could buy narcotics at both the Van Buren and Jackson drug spots. LINTON offered to sell UC7 eighteen packs for \$2,500.

149. UC1 placed several calls to WEBB that went unanswered. Between approximately 12:53 p.m. and 6:03 p.m. LINTON and UC7 exchanged several

consensually recorded phone calls discussing the quantity and price of the packs of heroin.

150. At approximately 6:03 p.m., UC7 met LINTON at the Jackson drug spot to purchase narcotics. The controlled narcotics transaction was audio and video recorded. During the transaction LINTON provided UC7 with approximately 255 smaller Ziplock baggies containing suspect heroin in exchange for \$2,500. The suspect heroin had an approximate weight of 301.3 grams, of which 15.3 grams were tested and determined to be mixtures of fentanyl and heroin.

3. February 15, 2022 - Arrest of KYLE LINTON at the Jackson Drug Spot and Seizure of a Firearm and Narcotics

151. On or about February 15, 2022, at approximately 1:50 p.m., using a pole camera, LEOs observed LINTON standing inside the fence of the front yard at the Jackson drug spot. LEOs saw LINTON holding a black handgun with an attached high-capacity drum magazine. LEOs observed, between approximately 1:50 p.m. and 2:28 p.m., LINTON conducted multiple hand-to-hand transactions while holding the black handgun with the attached high-capacity drum magazine.

152. At approximately 2:28 p.m., LEOs arrived at the Jackson drug spot and placed LINTON under arrest. LEOs recovered from LINTON one Glock Model 23, .40 caliber handgun with a high-capacity drum magazine, approximately 14 capsules containing a chunky substance, suspect cocaine, and approximately 16 smaller Ziplock baggies with blue devil designs on them containing a white powdery substance, suspect heroin. The contents of the 16 smaller Ziplock baggies with blue devil designs weighed 15.1 grams and were tested and determined to contain

mixtures of heroin and fentanyl. The 14 capsules containing chunky substance of suspect cocaine weighed 1.3 grams.

VII. CONCLUSION

153. Based on the foregoing, I respectfully submit that there is probable cause to believe that, beginning in at least February 2021, and continuing until the present, Nathaniel Evans, also known as “Head” and “Bro,” Jarelle Jones, also known as “Hell Rell” and “Relle,” Marquis Jones, also known as “Tunchie” and “Toon,” Devontay Logan, also known as “Vontay,” “Tay,” and “V-tay,” Joseph Williams, also known as “Jo Jo,” Dornell Williams, also known as “D-Nice,” Teremius Webb, also known as “T-Roy and “Peanut,” Antonio Fletcher, also known as “P,” Kyle Linton, and Maurice Bell, conspired with each other, and with others known and unknown to the United States, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, namely, 400 grams or more of mixtures and substances containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance; 1 kilogram or more of mixtures and substances containing a detectable amount of

heroin, a Schedule I Controlled Substance; and 500 grams or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 846; all in violation of 21 U.S.C. § 846.

FURTHER AFFIANT SAYETH NOT.

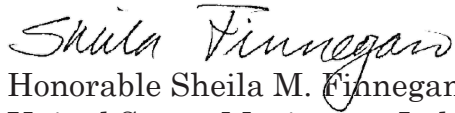
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CHUNG KIM

Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone May 10, 2022.



Honorable Sheila M. Finnegan
United States Magistrate Judge