

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America)

v.)

MATTHEW J. WARD, REBECCA MARTINEZ,
 CYNTHIA ROOKS, RICHARD FORD, AMBER
 HOFFMAN, SAMUEL DEXTER JUDY, BRIAN BRUCE,
 MONTANA BAREFOOT, JOHN JOHNSON, KELLY
 STILL, BENJAMIN SINGLETON, KAYLA MATTONI,
 ALECIA YOUNGBLOOD, CLIFFORD KYZER, KELLY
 JORDAN, ROBERTO FIGUEROA and TIFFANIE
 BROOKS

Case No. 3:20-mj-87

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of July 1, 2017 through October 1, 2019 in the county of Lexington in theDistrict of South Carolina, the defendant(s) violated:*Code Section*

Title 21, U.S.C. § 846

Offense Description

Conspiracy to Possess with Intent to Distribute and Distribute Methamphetamine

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Appeared & sworn by telephone

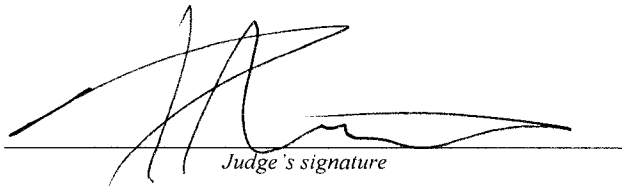
Rosalie Herberger

Complainant's signature

ATF Special Agent Rosalie Herberger

Printed name and title

Sworn to via telephone after
 submission by reliable electronic means.
 Fed. R. Crim. P. 4.1, 41(d)(3).

Date: 9/11/20 9:00a.m.City and state: Greenville, South Carolina

Judge's signature

Kevin F. McDonald, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Rosalie R. Herberger, being duly sworn, depose and state that:

I am an investigator or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered to conduct investigations of and to make arrests for the offenses enumerated in Titles 18, 19, 21, 26, and 31 of the United States Code and other related offenses. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so employed since January 2016. I am currently assigned to the Columbia, South Carolina Field Office. My duties involve the investigation of federal firearms offenses and associated violent crimes and narcotics offenses.

Prior to serving as an ATF Special Agent, I was both a police officer with the United States Secret Service and a United States Customs and Border Protection Officer. I have been working in the law enforcement field for nearly seven years. I am a graduate of the Federal Law Enforcement Training Center, the United States Secret Service Academy, the United States Customs and Border Protection Academy, and the ATF National Academy.

As a result of my training and experience as an ATF Special Agent, I am familiar with federal criminal laws and respectfully submit that the following is a violation of Title 21, United States Code, Sections 841(a)(1) and 846. I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a criminal complaint, I have not included each and every fact known by the government concerning criminal activities committed by the defendants.

Summary of Investigation

In July 2017, ATF Task Force Officer (TFO) Jonathan Brock coordinated two controlled purchases of methamphetamine from Kayla MATTONI. Approximately 10 months later, in May 2018, ATF began an investigation into Benjamin SINGLETON for the illegal sale of firearms. Quickly into the investigation, ATF identified Singleton as a distributor of methamphetamine and connected him with MATTONI. Shortly after establishing a relationship with SINGLETON, SINGLETON informed an ATF operative that his methamphetamine source of supply (SOS) was Alecia YOUNGBLOOD and that he was in a relationship with Montana BAREFOOT. ATF subsequently set up a controlled purchase of methamphetamine from YOUNGBLOOD, and then used an informant to establish a relationship with BAREFOOT. With every connection made, ATF ultimately learned that Matthew J. WARD, an inmate at the South Carolina Department of Corrections (SCDC), was a key methamphetamine SOS for major distributors in the Lexington, South Carolina, area. Thereafter, ATF worked the investigation with an eye towards identifying and arresting WARD's distribution network.

During the course of this multi-year investigation, ATF identified the below individuals as significant methamphetamine distributors in and around Lexington. I submit this affidavit in support of a criminal complaint and arrest warrant charging the following people with conspiring

to possess with intent to distribute and distribute methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and 846:

DEFENDANT	CONTROLLED SUBSTANCE	PENALTY
REBECCA MARTINEZ	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
CYNTHIA ROOKS	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
RICHARD FORD	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
MATTHEW J. WARD	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
AMBER HOFFMAN	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
SAMUEL DEXTER JUDY	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
BRIAN BRUCE	50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(B)
MONTANA BAREFOOT	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
JOHN JOHNSON	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
KELLY STILL	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
BENJAMIN SINGLETON	50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(B)
KAYLA MATTONI	50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(B)
ALECIA YOUNGBLOOD	50 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(B)
CLIFFORD KYZER	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
KELLY JORDAN	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
ROBERT FIGUEROA	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)
TIFFANIE BROOKS	500 grams or more of methamphetamine	21 U.S.C. § 841(b)(1)(A)

Rebecca MARTINEZ: (21 U.S.C. § 841(b)(1)(A))

Starting in July 2019, ATF made multiple controlled purchases of methamphetamine from Rebecca MARTINEZ. MARTINEZ identified herself as Matthew WARD's girlfriend and distributed methamphetamine regularly on his behalf. She also interacted regularly with Cynthia ROOKS. The following briefly describes MARTINEZ's criminal conduct.

- **July 19, 2019:**

- On or about July 19, 2019, ATF set up the controlled purchase of approximately four ounces of methamphetamine for \$1,300 from Rebecca MARTINEZ through Facebook Messenger and then subsequent phone calls and text messages with phone number 803-846-0895. A confidential informant (CI) was employed for this operation. CI was searched for contraband with negative results and wired up with an audio-video recorder.
- CI first met MARTINEZ at 308 Judan Drive, West Columbia, South Carolina. MARTINEZ told CI, "If you've got money, you can follow me to Piney Grove. I can't have anyone at my house and we can just do it right there." CI then followed MARTINEZ to the San Jose Mexican Restaurant, where CI paid MARTINEZ \$1,300 for 109.49 grams of methamphetamine.

- **July 22, 2019:**

- On or about July 22, 2019, ATF set up the controlled purchase of approximately four ounces of methamphetamine for \$1,400 from Rebecca MARTINEZ through phone calls and text messages with phone number 803-846-0895. CI was searched for contraband with negative results, wired up with an audio-video recorder, and joined by an ATF undercover agent (UC) during the buy.
- CI and UC met MARTINEZ at Bozes Bar located at 2736 Emanuel Church Road. MARTINEZ was on the phone with Matthew WARD when CI and UC arrived. CI recognized WARD's voice immediately as the two had spoken on the phone several times prior. WARD told CI that he did not trust the McDonalds parking lot across the street (which is where CI and UC had originally been parked before meeting MARTINEZ at Bozes Bar). CI then paid MARTINEZ \$1,400 for 105.36 grams of methamphetamine.

- **July 24, 2019:**

- On or about July 24, 2019, ATF set up the controlled purchase of approximately six ounces of methamphetamine for \$1,920 from Rebecca MARTINEZ through Facebook Messenger and text messages with phone number 803-846-0895. CI was searched for contraband with negative results and joined by an ATF UC for the buy.
- CI and UC met MARTINEZ at her residence at 308 Judan Street, West Columbia, South Carolina. When CI and UC arrived, MARTINEZ exited her residence and instructed CI to get into her vehicle (a silver in color Dodge Charger). CI then entered MARTINEZ's passenger side door and paid MARTINEZ \$1,920 for 148.38 grams of methamphetamine. CI and UC then departed MARTINEZ's residence and returned to the predetermined meet location.

- Later that evening, CI texted MARTINEZ that she shorted them 12 grams. MARTINEZ replied, “Tell him I’ll give it back to him on the next go-round. I promise. U know me... I don’t do shady business.”

Source statements:

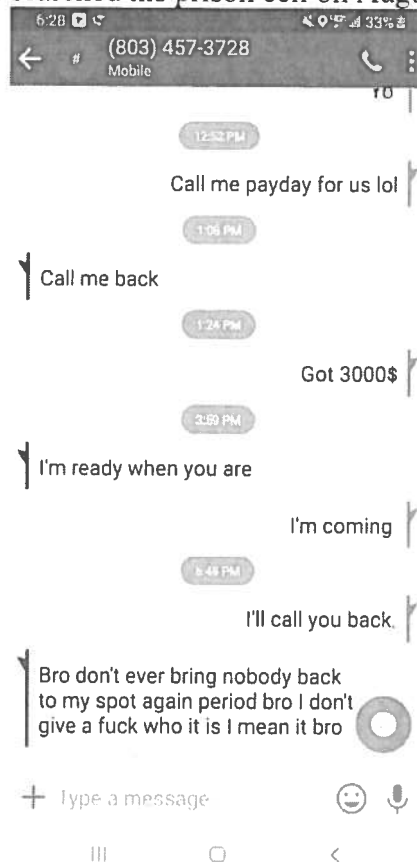
During the course of the investigation, four independent sources (each corroborated for credibility purposes with independent evidence) identified MARTINEZ as a significant methamphetamine distributor who distributed at least ounce quantities. One source informed ATF that MARTINEZ told the source that she picked up methamphetamine for WARD and would pick up one to five kilograms of methamphetamine at a time.

Cynthia ROOKS: (21 U.S.C. § 841(b)(1)(A))

ROOKS maintained a storage unit for Matthew WARD containing kilogram quantities of methamphetamine and firearms. ROOKS was a wholesale distributor of methamphetamine and also a distributor of firearms for WARD. Many suspects, to include Rebecca MARTINEZ, were often seen at ROOKS's residence. The following briefly describes ROOKS's criminal conduct.

- **August 5, 2019:**

- On or about August 5, 2019, an ATF CI contacted Matthew WARD. WARD connected the CI with Cynthia ROOKS, who lived at 120 Jakes Landing Road, Lexington, South Carolina. WARD referred to ROOKS as his "old lady." CI then contacted ROOKS and drove with an ATF UC to 138 Jakes Landing Road (next door to 120 Jakes Landing Road) to purchase 11 ounces of methamphetamine for \$3,000. When ROOKS arrived, CI and UC entered the house. ROOKS walked to and from the bedroom areas multiple times, and then brought out a grey in color plastic bag and placed it on the living room couch. UC then carried the bag to the kitchen area with ROOKS, and ROOKS provided digital scales for UC to weigh the methamphetamine. After weighing out the methamphetamine, UC gave ROOKS \$3,000. After the buy, WARD sent CI a text message from phone number 803-457-3728 warning him not to bring anyone over to his "spot" again. The methamphetamine lab tested positive and weighed approximately 302 grams. The phone with caller number 803-457-3728 was in WARD's physical possession when SCDC personnel searched his prison cell on August 23, 2019.



- **August 19, 2019:**

- On or about August 19, 2019, ATF CI made contact with WARD on phone number 803-457-3728. WARD put CI in touch with ROOKS again. CI arranged to purchase methamphetamine and a firearm (Interarms, model AKM47 SA, 7.62x33 rifle, serial number CC8607). WARD had sent CI photos of several firearms via text message.

When CI arrived at ROOKS's residence off Jakes Landing Road, ROOKS was on the phone with WARD. WARD, on speakerphone, could be overheard telling ROOKS that CI wanted two ounces of methamphetamine. Law enforcement had real time audio and video feed going at all times.

WARD began discussing guns with ROOKS over the phone and instructed ROOKS to take CI next door to 138 Jakes Landing to "let him look at the AKs next door." While at 138 Jakes Landing, ROOKS picked up an AR-style rifle and let CI take a photo of it. WARD then directed ROOKS to the North Lake Storage Center facility located 0.2 miles away to get the exact firearm CI was going to purchase from them. During the trip to the storage unit, ATF had surveillance on site. ATF observed Richard FORD walk out of the storage unit (#59) with a large item in his hands while ROOKS stood in front of the vehicle. ROOKS and FORD then returned to 120 Jakes Landing, met CI, and sold CI 56.05 grams of methamphetamine and the Interarms AKM47 SA rifle for \$1,000.

- **August 22–23, 2019:**

- On or about August 22, 2019, ROOKS called CI after she was cut off by WARD and Samuel Dexter JUDY because she had previously failed to answer her phone. Agents wired CI, and CI went to ROOKS's house. CI went to ROOKS's house, and ROOKS told CI how JUDY was on a drug run and discussed historical drug runs she had made for WARD and the DTO. CI contacted ATF and gave agents the vehicle information for JUDY. Agents then located JUDY after he left storage unit #59, a car chase ensued, and multiple firearms were found in the vehicle.

After JUDY was arrested, WARD reached out to CI and asked CI to pick up a kilogram of methamphetamine from ROOKS's house. CI then went back to ROOKS's. ROOKS and her brother, Richard FORD (codefendant listed below), gave CI 1,001 grams of methamphetamine from the spare tire of a Honda vehicle at ROOKS's residence. CI then started receiving more and more messages from WARD and another male who referred to himself as "Savage" but was later identified as Jamin Johnson (note: Johnson was indicted in August 2020 by DEA Columbia).

CI held WARD and Johnson off, while Lexington County Sheriff's Department and ATF received and executed a search warrant at ROOKS's residence at 120 Jakes Landing Road. During the search, agents located five ounces of methamphetamine and a Derringer Cobra CB38 .38 caliber pistol in ROOKS's bedroom. ROOKS said the five ounces came from Samuel Dexter JUDY. Agents

also located .38 caliber ammunition, a composition notebook and additional loose paper that appeared to served as a drug ledger, multiple scales, and several Ziploc bags.

After searching ROOKS's residence, agents also received and executed a search warrant at storage unit #59. Inside the storage unit, agents located:

- Stevens, Model: 320 Caliber: 12-gauge, Type: Shotgun, Serial Number: 185615
- Stevens, Model: 95, Caliber: 12 gauge, Type: Shotgun, Serial number: unknown
- Mossberg, Model: 500, Caliber: 12-gauge, Type: Shotgun, Serial Number: V0496768
- Beretta, Model: 22LR, Caliber 22, Type: Rifle, Serial Number: PB023615
- Eagle Arms, Model: Eagle-15, Caliber: .223, Type: Rifle, Serial Number: M22-23963
- Springfield, Model: M1A1, Caliber: M1, Type: Rifle, Serial Number: 280812
- Remington, Model: 783, Caliber: 308, Type: Rifle, Serial Number: RA13711B
- Palmetto Armory, Model: PA-15, Caliber: .223, Type: Rifle, Serial Number: SCD04718
- Black in color AK style rifle with no serial number
- Five magazines and assorted ammunition
- One gallon Ziploc bag found by itself containing 994 grams of methamphetamine
- Two additional gallon Ziploc bags found inside a safe containing 1,985 grams of methamphetamine.

Richard FORD: (21 U.S.C. § 841(b)(1)(A))

FORD is ROOKS's brother, who lived with ROOKS at the Jakes Landing Residence and conspired with ROOKS to distribute methamphetamine and firearms for WARD. The following briefly describes FORD's criminal conduct.

- **August 12, 2019:**
 - o On or about Aug 12, 2019, ATF CI contacted WARD and WARD directed CI to Cynthia ROOKS and Richard FORD's residence at 120 Jakes Landing Road. CI was searched beforehand with negative results and given ATF funds to purchase a quantity of methamphetamine. CI was joined by an ATF UC. When CI and UC arrived at the residence, they were greeted by FORD. CI walked with FORD to a bedroom, where FORD sold CI approximately 28.08 grams of methamphetamine for \$300. CI and UC then departed and returned to the initial briefing location.
- **August 19, 2019:**
 - o On or about August 19, 2019, FORD was with ROOKS when they went to storage unit #59 and sold ATF CI 56.05 grams of methamphetamine and an Interarms AKM47 SA rifle (bearing serial number CC8607) for \$1,000.
 - o (This incident is more fully described above under ROOKS.)
- **August 22, 2019:**
 - o Arrest included search warrant at ROOKS's Jakes Landing Road Residence and the storage unit (#59). Search of storage unit led to seizure of approximately three kilograms of methamphetamine and nine firearms. CI had previously taken possession of one additional kilogram of methamphetamine from ROOKS and FORD at the direction of WARD.
 - o (This incident is more fully described above under ROOKS.)

Source statements:

There are two significant source statements detailing FORD's role in the conspiracy that corroborate his known activity described above.

Matthew J. WARD: (21 U.S.C. § 841(b)(1)(A))

Matthew J. WARD is an identified leader of this drug trafficking organization operating primarily in and around Lexington, South Carolina. WARD is known to have employed several individuals—to include Rebecca MARTINEZ, Cynthia ROOKS, Samuel Dexter JUDY (described below) and others—to obtain kilogram quantities of methamphetamine on his behalf, distribute significant quantities of methamphetamine thereafter, and further participate in the unlicensed dealing of firearms. WARD has been mentioned above, and the following briefly describes his criminal conduct.

- **June 13, 2019:**

- o On or about June 13, 2019, an ATF CI coordinated the purchase of approximately three ounces of methamphetamine from WARD and co-conspirator Brian BRUCE (described below) over Facebook Messenger. After setting up the controlled buy, CI purchased 80.58 grams of methamphetamine. This operation was audio and video recorded.

- **June 13, 2019:**

- o On or about June 13, 2019, an ATF CI purchased approximately 54.44 grams of methamphetamine from co-conspirator Amber HOFFMAN for \$450. Through several source statements, WARD was known to be HOFFMAN's methamphetamine source of supply.

- **June 26, 2019:**

- o On or about June 26, 2019, WARD called CI to bond HOFFMAN out of jail on state charges. After CI bonded HOFFMAN out, WARD told CI that he had a "stub nose .357" and a quantity of heroin for him.

CI met with ATF agents, was searched for contraband, and then wired up. CI then picked up HOFFMAN, who directed him to 1419 Mack Street, Gaston, South Carolina. When they arrived, HOFFMAN got out of the vehicle, went into the house, and returned. CI then drove to 155 Player Road, Gaston, South Carolina. When they arrived, HOFFMAN exited the vehicle and went into the house. When HOFFMAN came back, she gave CI a Taurus .357 caliber firearm (serial number KS90213).

HOFFMAN told CI she received approximately seven grams (or one-quarter ounce) of heroin for herself and approximately seven grams for CI from co-conspirator John JOHNSON. JOHNSON lived at 1421 Mack Street. HOFFMAN also told CI that Samuel Dexter JUDY was at the 155 Player Road address, which was HOFFMAN's brother's house. HOFFMAN had previously told CI that JOHNSON would provide the heroin and JUDY would provide the .357 firearm.

- **July 3, 2019:**

- o On or about July 3, 2019, an ATF CI reached out to WARD to arrange the purchase of two ounces of methamphetamine. Shortly thereafter, JUDY contacted CI to

complete the purchase. Agents gave CI \$600. CI then drove to 1236 Fallaw Road and met JUDY, who was in a vehicle outside the address and remained in the vehicle during the transaction. CI exchanged \$600 for approximately 58 grams of methamphetamine.

- **July 19, 2019:**
 - o ATF CI buy of 109.49 grams of methamphetamine from Rebecca MARTINEZ, who was known to be operating on behalf of WARD (described above).
- **July 22, 2019:**
 - o ATF CI buy of 105.36 grams of methamphetamine from Rebecca MARTINEZ, who was known to be operating on behalf of WARD (described above).
- **July 24, 2019:**
 - o ATF CI buy of 148.38 grams of methamphetamine from Rebecca MARTINEZ, who was known to be operating on behalf of WARD (described above).
- **August 5, 2019:**
 - o ATF CI and UC buy of 302 grams of methamphetamine from Cynthia ROOKS, who was known to be operating on behalf of WARD (described above).
- **August 19, 2019:**
 - o Significant details under Cynthia ROOKS above.
 - o ROOKS and FORD sold ATF CI 56.05 grams of methamphetamine and an Interarms AKM47 SA rifle for \$1,000 on behalf of WARD.
- **August 22, 2019:**
 - o Arrest included search warrant at ROOKS's Jakes Landing Road Residence and the storage unit (#59). Search of storage unit led to seizure of approximately three kilograms of methamphetamine and nine firearms. CI had previously taken possession of one additional kilogram of methamphetamine from ROOKS and FORD at the direction of WARD.
 - o (This incident is more fully described above under ROOKS.)

Amber HOFFMAN: (21 U.S.C. § 841(b)(1)(A))

Amber HOFFMAN was a methamphetamine distributor for WARD, who is also connected with co-conspirators Samuel Dexter JUDY and John JOHNSON. As the details set forth below demonstrate, HOFFMAN was also found in close proximity to firearms on multiple occasions. The following briefly describes HOFFMAN's criminal conduct.

- **June 26, 2019:**

- On or about June 26, 2019, law enforcement observed a stolen vehicle pulling out of a parking spot in Lexington, South Carolina. The vehicle pulled into a gas station, where HOFFMAN exited the passenger seat. Robert Williams was in the driver's seat and fled on foot when the officer pulled behind the vehicle and initiated his blue lights. Williams was detained after a foot pursuit.
- HOFFMAN was then detained when she exited the restroom inside the gas station. HOFFMAN waived her *Miranda* rights and said she did not know anything about the vehicle but had needles in her purse. Officers subsequently located a silver bag in the passenger seat area and recovered a Taurus Model .380 pistol.
- The purse that HOFFMAN was carrying had \$649 in US currency, multiple small clear plastic bags, and needles.
- The store clerk told officers that HOFFMAN had left her phone in the bathroom. During a search of the bathroom, officers found two bags containing grams 85.64 grams of methamphetamine in the trash and small plastic baggies similar to the ones located in the truck.
- A further search of the vehicle revealed eight shotgun shells, a cell phone, and a digital scale in a female's bag, in addition to four .380 caliber bullets found in the bag with the Taurus .380 handgun.

- **June 26, 2019: (continued)**

- On June 26, 2019, after Hoffman was arrested due to the above conduct, an ATF CI contacted agents and said that Matthew WARD contacted CI via Facebook Messenger and told CI to bond HOFFMAN out of jail. CI paid \$700 to bond HOFFMAN out of jail and showed agents the receipt. In return, WARD told CI that he had a .357 stub nose firearm and heroin to give him as payment.
- CI met with HOFFMAN to facilitate the exchange of the firearm and heroin as described above. Per HOFFMAN, John JOHNSON provided the firearm, a .357 caliber Taurus Model firearm (serial number KS90213), and Samuel Dexter JUDY provided 7.48 grams of heroin.

- **July 2, 2019:**

- On or about July 2, 2019, law enforcement conducted a fugitive operation at 1419 Mack Street, Gaston, South Carolina, in search of John JOHNSON. JOHNSON and HOFFMAN were found inside the residence.
- During a search of the residence, officers located multiple firearms (to include an AR-style rifle), ammunition, and a ledger with photos containing a list of names and dollar amounts.

- JOHNSON waived his *Miranda* rights and said all the guns inside the house were his. HOFFMAN said she had a dirty needle inside a purse inside the master bedroom. The purse also contained \$1,398 in US currency.

Source statements:

There are two significant source statements that have been deemed credible through the independent corroboration of various assertions throughout their statements.

- One source said that between June 2018 and September 2019, the source purchased two ounces of methamphetamine from HOFFMAN every two to three days. Conservatively, the source purchased approximately 208 ounces (or roughly 5,895 grams) of methamphetamine from HOFFMAN during that time period.
- A second source said from April 2019 through July 2019 on approximately 10 occasions, the source sold HOFFMAN four to eight ounces of methamphetamine. Conservatively, this would be 40 ounces or approximately 1,133 grams. The source further confirmed that HOFFMAN and JUDY associated with one another regularly.

Samuel Dexter JUDY: (21 U.S.C. § 841(b)(1)(A))

This investigation revealed JUDY to consistently affiliate with MARTINEZ, HOFFMAN, and ROOKS, and operate at the direction of WARD. JUDY is known to assist in drug transactions, as well as provide security and surveillance when couriers such as ROOKS were in transit with kilogram quantities of methamphetamine. JUDY is also frequently found in close proximity to firearms. The following briefly describes JUDY's criminal conduct.

- **July 3, 2019:**

- On or about July 3, 2019, an ATF CI reached out to WARD to arrange the purchase of two ounces of methamphetamine. Shortly thereafter, JUDY contacted CI to complete the purchase. Agents gave CI \$600. CI then drove to 1236 Fallaw Road and met JUDY, who was in a vehicle outside the address and remained in the vehicle during the transaction. CI exchanged \$600 for approximately 58 grams of methamphetamine. JUDY then asked CI how much WARD charged CI for the pistol JUDY provided through HOFFMAN on June 26, 2019. JUDY asked CI to return the pistol to him for a reward and showed CI five grams of heroin.

- **August 22, 2019:**

- On or about August 22, 2019, agents received information that JUDY was picking up a load of methamphetamine and driving it back to Lexington, South Carolina. Officers initiated a traffic stop on JUDY's vehicle when he returned from his trip. JUDY refused to stop and fled from the officers. At one point, a silver pistol was thrown from the driver's side of the vehicle, which was recovered. JUDY bailed out of the vehicle, ran, and got away. The front seat passenger, Andrew Stacy, was detained and waived his *Miranda* rights. Stacy identified JUDY as the driver. A search of the vehicle revealed eight .38 special cartridges, two boxes with 99 .38 caliber cartridges, an AR-15 magazine, an AK-47 magazine with 26 7.62 caliber cartridges, a digital scale, a quantity of methamphetamine, and a cell phone.

- **August 28, 2019:**

- On or about August 28, 2019, law enforcement arrived at the Super 9 Motel at 411 Piney Grove Road, Columbia, South Carolina, after receiving information that JUDY was staying in Room 324. Police had an active arrest warrant for JUDY. JUDY answered the door and was immediately detained. After seeing a bullet on one of the beds and a clear baggie containing suspected methamphetamine on the night stand, police obtained a search warrant for the hotel room. During execution of the search warrant, police seized the methamphetamine, which was lab tested and weighed approximately 78.9 grams. Police also found keys to a 2012 black in color Dodge Charger in the hotel room. Police had prior information that JUDY was driving a stolen black Charger. Police confirmed using the key fob that the keys were for the vehicle. Police ran the VIN and confirmed the vehicle was stolen. During a search of the vehicle, police located a Heritage .22 caliber revolver bearing serial number L01053. JUDY gave consent to search his phone, and ATF found pictures and text messages connecting JUDY to the stolen vehicle.

Source statements:

There are two significant source statements that have been deemed credible through the independent corroboration of various assertions throughout their statements.

- One source said JUDY would follow ROOKS as she traveled twice a week to pick up kilogram quantities of methamphetamine to distribute for Matthew WARD.
- A second source said that in addition to following ROOKS, JUDY himself picked up one to five kilograms of methamphetamine on six to eight occasions between April 2019 and August 2019. The source further said that once JUDY would return with the methamphetamine, he would deliver to ROOKS's residence to store.

Brian BRUCE: (21 U.S.C. § 841(b)(1)(B))

The investigation revealed BRUCE to be a distributor of methamphetamine on WARD's behalf. WARD often supplied BRUCE with methamphetamine, which on July 20, 2019, resulted in BRUCE being severely injured and taken to the hospital over an alleged drug debt. The investigation further revealed that BRUCE often associated with Montana BAREFOOT. The following briefly describes BRUCE's criminal conduct.

- **June 13, 2019:**

- o On or about June 13, 2019, an ATF CI coordinated the purchase of approximately three ounces of methamphetamine from WARD and co-conspirator Brian BRUCE over Facebook Messenger. After setting up the controlled buy, CI purchased 80.58 grams of methamphetamine. This operation was audio and video recorded.

- **July 15, 2019:**

- o On or about July 15, 2019, CI coordinated with Montana BAREFOOT for the purchase of methamphetamine. CI arrived to the residence (that CI and BAREFOOT had discussed) and was let in by BRUCE. While waiting for BAREFOOT to arrive, BRUCE and CI discussed methamphetamine. When BAREFOOT arrived, all three went into a bedroom where BAREFOOT weighed out approximately one ounce of methamphetamine. This buy was audio and video recorded, and the methamphetamine tested positive at the lab and weighed 27.76 grams.

- **July 16, 2019:**

- o On or about July 16, 2019, CI coordinated with Brian BRUCE for the purchase of methamphetamine. The buy was audio and video recorded, and the confirmed lab weight of the methamphetamine was 13.83 grams.

- **August 29, 2019: (law enforcement encounter of note)**

- o On or about August 29, 2019, a police officer approached Brian BRUCE at a gas station for suspicious activity. BRUCE was the driver of the vehicle and Montana BAREFOOT was the passenger. Pursuant to a subsequent search of the vehicle, officers located a small quantity of methamphetamine, heroin, and diazepam (i.e., Valium) pills.

Montana BAREFOOT: (21 U.S.C. § 841(b)(1)(A))

Throughout this investigation, ATF identified BAREFOOT to be an active distributor of methamphetamine and firearms. BAREFOOT affiliated with Brian BRUCE and has also purchased methamphetamine from Amber HOFFMAN and Alecia YOUNGBLOOD. The following briefly describes BAREFOOT's criminal conduct.

- **January 29, 2019:**

- On or about January 29, 2019, an ATF CI communicated with Montana BAREFOOT through Facebook for the purchase of a firearm and methamphetamine. BAREFOOT met with the CI and an UC and handed them a bag telling them that the methamphetamine and firearm were in the bag. BAREFOOT then removed the firearm (a Charter Arms Explorer II pistol) and assembled it for the CI and UC. BAREFOOT also stated she "bagged" the methamphetamine herself. BAREFOOT was filmed on a hidden camera inside the vehicle, and the lab came back at 6.63 grams of methamphetamine.

- **February 12, 2019:**

- On or about February 12, 2019, Montana BAREFOOT coordinated the sale of approximately 28 grams of methamphetamine to a CI. CI and BAREFOOT drove to meet an unidentified black male, who gave CI a bag with 27.54 grams of methamphetamine. The buy was audio and video recorded.

- **April 22, 2019:**

- On or about April 22, 2019, Montana BAREFOOT was present at a residence when officers arrived to serve an arrest warrant on a third party. BAREFOOT had an outstanding warrant with state probation at the time and was arrested. Officers found a purse located approximately 12 inches away from BAREFOOT with her digital scale in it and 6.08 grams of methamphetamine. BAREFOOT claimed the digital scale in a post-*Miranda* statement, but denied the methamphetamine.

- **July 5, 2019:**

- On or about July 5, 2019, Montana BAREFOOT sold 13.53 grams of methamphetamine to a CI. During the deal, BAREFOOT told CI that she would sell CI the drugs for cheaper if CI purchased greater quantities. This controlled buy was audio and video recorded.

- **July 15, 2019:**

- On or about July 15, 2019, CI coordinated with Montana BAREFOOT for the purchase of methamphetamine. CI arrived to the residence (that CI and BAREFOOT had discussed) and was let in by BRUCE. While waiting for BAREFOOT to arrive, BRUCE and CI discussed methamphetamine. When BAREFOOT arrived, all three went into a bedroom where BAREFOOT weighed out the approximately one ounce of methamphetamine. This buy was audio and video recorded, and the methamphetamine tested positive at the lab and weighed 27.76 grams.

- **September 25, 2019:**

- On or about September 25, 2019, Montana BAREFOOT dropped off James Jackson for his meeting with state probation. During the meeting, Jackson admitted to using drugs so officers asked to search the car he arrived in. The car was occupied by BRUCE and BAREFOOT. BRUCE and BAREFOOT told the officers that a book bag in the truck belonged to Jackson. Jackson stated the book bag was not his. When officers searched the book bag, they found 12.50 grams of methamphetamine and a Jimenez Arms .22 caliber pistol. BAREFOOT claimed the gun was hers but did not claim the book bag.

- **Conduct of note:**

- On or about August 7, 2019, BAREFOOT and an unknown male sold an ATF CI and UC a Smith & Wesson Bodyguard .380 caliber pistol and ammunition.
- On or about August 20, 2019, BAREFOOT sold an ATF CI and UC and American Arms Cx 22 .22 caliber pistol and H&R Inc. 929 .22 caliber pistol.

Source statement:

A source of information deemed credible through the independent corroboration of various assertions throughout the source's statement disclosed the following:

- BAREFOOT purchased approximately 208 ounces (or 5,895 grams) of methamphetamine from Amber HOFFMAN between June 2018 and September 2019.
- BAREFOOT purchased approximately 12 ounces (or 340 grams) of methamphetamine from Alecia YOUNGBLOOD.
- BAREFOOT also coordinated with Matthew WARD for the purchase of methamphetamine.

John JOHNSON: (21 U.S.C. § 841(b)(1)(A))

Throughout the investigation, ATF learned the JOHNSON is affiliated with both Amber HOFFMAN and Kelly STILL. Source statements also indicate that JOHNSON purchased methamphetamine from Rebecca MARTINEZ and held firearms for Matthew WARD. The following briefly describes JOHNSON's criminal conduct:

- **July 2, 2019:**

- On or about July 2, 2019, law enforcement conducted a fugitive operation at 1419 Mack Street, Gaston, South Carolina, in search of John JOHNSON. JOHNSON and Amber HOFFMAN were found inside the residence.
- During a search of the residence, officers located multiple firearms (to include an AR-style rifle), ammunition, and a ledger with photos containing a list of names and dollar amounts.
- JOHNSON waived his *Miranda* rights and said all the guns inside the house were his. HOFFMAN said she had a dirty needle inside a purse inside the master bedroom. The purse also contained \$1,398 in US currency.

- **November 19, 2019:**

- On November 19, 2019, JOHNSON and Kelly STILL were involved in a high-speed chase topping 100 mph with the South Carolina Highway Patrol (SCHP) on I-20 in Aiken, South Carolina. After SCHP was able to stop JOHNSON's vehicle, JOHNSON admitted to not having a license and STILL, after waiving her *Miranda* rights, informed the Trooper that methamphetamine was in the purple bag in the backseat. During a search of the vehicle, law enforcement located:
 - Approximately 1,630 grams of methamphetamine
 - Approximately 1.9 grams of heroin
 - Three and one-half pills of alprazolam
 - Two pills of ecstasy
 - Eighteen grams of marijuana
 - Smith & Wesson, Model: M&P Shield, Caliber: 40, Serial number: HWK9459 (stolen)
 - Four .40 caliber cartridges
 - Thirty-six 9mm cartridges
 - Six .38 special cartridges
 - One .22 Rimfire cartridge

Source statements:

There are two significant source statements that have been deemed credible through the independent corroboration of various assertions throughout their statements.

- One source indicated that from April 2019 to August 2019, Johnson purchased four ounces (or 113 grams) of methamphetamine from Rebecca MARTINEZ.
- A second source reported that JOHNSON had traveled to Georgia with STILL previously when STILL went to pick up drugs.

Kelly STILL: (21 U.S.C. § 841(b)(1)(A))

During this investigation, ATF learned that STILL knew WARD and purchased methamphetamine from MARTINEZ on multiple occasions. STILL also traveled to Georgia to pick up drugs and on November 19, 2019, was arrested with JOHNSON and found to be in possession of approximately 1,630 grams of methamphetamine. The following briefly describes STILL's criminal conduct.

- **November 19, 2019:**

- The details of this incident are described immediately above under JOHNSON. It was later learned that STILL drove to Mableton, Georgia, to purchase 1.5 kilograms of methamphetamine for \$6,400. The total amount of methamphetamine seized from the vehicle was approximately 1,630 grams.

Source statements:

ATF also learned through source statements proven reliable due to independent corroborating evidence that STILL had previously purchased approximately one ounce (or 28.3495 grams) of methamphetamine per week for approximately six weeks from MARTINEZ. Sources also identified STILL as a major source of supply for JOHNSON, estimating that STILL provided JOHNSON approximately 500 grams of methamphetamine on one occasion and an entire kilogram of methamphetamine on a second occasion.

Benjamin SINGLETON: (21 U.S.C. § 841(b)(1)(B))

SINGLETON, as mentioned at the beginning, was one of the first people ATF purchased methamphetamine from in this conspiracy. From the beginning of this investigation, ATF learned quickly that SINGLETON as associated with Kayla MATTONI, Alecia YOUNGBLOOD, and Montana BAREFOOT. The following briefly describes SINGLETON's criminal conduct.

- **May 15, 2018:**

- On or about May 15, 2018, an ATF CI coordinated the purchase of methamphetamine from SINGLETON. CI went to SINGLETON's residence and purchased 6.5 grams of methamphetamine. While there, the CI saw a .380 Hi Point under SINGLETON's pillow. SINGLETON showed the firearm to CI and CI observed that it had a sawed-down slide. The buy was audio recorded.

- **June 6, 2018:**

- On or about June 6, 2018, SINGLETON sold an ATF CI and UC approximately 12 grams of methamphetamine for \$240 and a Ruger Model LCP .380 caliber pistol (serial number: 37489546) for \$250. The buy was audio recorded.

- **July 25, 2018:**

- On or about July 25, 2018, an ATF UC coordinated the purchase of three firearms and approximately 44 grams of methamphetamine from Benjamin SINGLETON and Kayla MATTONI. UC arrived at 518 Longs Pond Road, Lexington, South Carolina, and approached a vehicle where SINGLETON was driving and MATTONI was in the passenger's seat. When UC approached, UC could see SINGLETON weighing the methamphetamine. MATTONI got out of the vehicle and went in the residence. SINGLETON then directed UC to a box in the back where the firearms were located. SINGLETON then called MATTONI, who came back outside and provided an additional five grams of methamphetamine to UC. UC and MATTONI negotiated the price of the methamphetamine at \$800 and the firearms at \$700.
- The firearms purchased by UC were a (1) Ruger, model SR22, .22 caliber pistol (serial number 36501449), (2) Davis Industries, model P-32, .32 caliber pistol (obliterated serial number), and (3) Hi-Point, model JCP, .40 caliber pistol (serial number 745738), and 30 rounds of assorted ammo. The buy was audio and video recorded.

- **September 11, 2018:**

- On or about September 11, 2018, Benjamin SINGLETON and Kayla MATTONI sold an ATF UC approximately 56 grams of methamphetamine for \$1,000 and a Smith & Wesson, model SD40VE, .40 caliber pistol (serial number FZP6987) and 24 rounds of assorted ammunition for \$440. In setting up the buy, UC first reached out to MATTONI who then linked UC up with SINGLETON. SINGLETON and MATTONI arrived together but only SINGLETON got into UC's vehicle. The buy was audio and video recorded.

Kayla MATTONI: (21 U.S.C. § 841(b)(1)(B))

Kayla MATTONI was the first person in the conspiracy ATF purchased methamphetamine from dating back to July 10, 2017. Shortly after purchasing from Benjamin SINGLETON in May 2018, ATF connected MATTONI and SINGLETON as co-conspirators. The following briefly describes MATTONI's criminal conduct.

- **July 10, 2017:**
 - o On or about July 10, 2017, Kayla MATTONI sold approximately 6.77 grams of methamphetamine to a Lexington County Sheriff's Department CI. The buy was audio and video recorded.
- **July 17, 2017:**
 - o On or about July 17, 2017, Kayla MATTONI sold approximately 6.87 grams of methamphetamine to a Lexington County CI. The buy was audio and video recorded.
- **July 25, 2018:** (Detailed above under SINGLETON)
 - o On or about July 25, 2018, MATTONI and SINGLETON sold an ATF UC three firearms and approximately 49 grams of methamphetamine.
- **August 21, 2018:**
 - o On or about August 21, 2018, Kayla MATTONI sold 50.16g of methamphetamine to an ATF UC. MATTONI told UC at the buy that she was involved in most of the firearms that UC had previously purchased. The buy was audio and video recorded.
- **September 11, 2018:** (Detailed above under SINGLETON.)
 - o On or about September 11, 2018, MATTONI and SINGLETON sold an ATF UC approximately 56 grams of methamphetamine and a Smith & Wesson .40 caliber pistol.
- **October 23, 2018:**
 - o Kayla MATTONI sold approximately 6.91 grams of methamphetamine to a CI. The buy was audio and video recorded.
- **December 28, 2018:**
 - o Kayla MATTONI was driving a vehicle that officers knew to be stolen. When she was arrested, the car was searched and a baggie of approximately 12 grams of methamphetamine and a pipe were found in the driver's seat along with syringes in the backseat.
- **Incident of note:**
 - o On or about September 25, 2019, Kayla MATTONI sold approximately one gram of heroin to a CI in seven different individual baggies. The buy was audio and video recorded.

Alecia YOUNGBLOOD: (21 U.S.C. § 841(b)(1)(B))

Alecia YOUNGBLOOD has been identified as a former source of supply for Benjamin SINGLETON. YOUNGBLOOD also supplied methamphetamine to at least two other sources of information. The following briefly describes YOUNGBLOOD's criminal conduct.

- **October 25, 2018:**

- o On or about October 25, 2018, a Lexington County CI arranged to buy four ounces of methamphetamine from YOUNGBLOOD using Facebook messenger for \$1,600. YOUNGBLOOD packaged each ounce in its own bag. The total lab weight of the methamphetamine was 110.10 grams.

Source statements:

There are two significant source statements that have been deemed credible through the independent corroboration of various assertions throughout their statements.

- The first source said that the source and/or the source's significant other purchased four ounces of methamphetamine one or two times a week from YOUNGBLOOD from January 2018 to October 2018. The source confirmed that YOUNGBLOOD used Facebook Messenger as her preferred communication medium.
- The second source said that YOUNGBLOOD sold the source one ounce of methamphetamine every two weeks between June 2018 and December 2018 for a conservative estimate of 12 ounces.

Clifford KYZER: (21 U.S.C. § 841(b)(1)(A))

During the investigation, ATF learned that KYZER made several runs to Greenville to pick up a kilogram of methamphetamine on Matthew WARD's behalf. KYZER, who is not a felon, was also an integral part of WARD's firearm trafficking operation. The following briefly describes KYZER's criminal conduct.

- **March 6, 2019:**

- On or about March 6, 2019, Kelly JORDAN was stopped by deputies with the Lexington County Sheriff's Department (LCSD) and arrested with approximately two kilograms of methamphetamine. Deputies quickly discovered that JORDAN had left KYZER's house just before her traffic stop, and obtained a search warrant for KYZER's then-residence at 1804 Two Notch Road, Lexington, South Carolina.

- Agents found the following upon searching KYZER's residence:

(Room 2: kitchen; Room 3: living room; Room 4: KYZER's bedroom; Room 6: spare bedroom; no notable contraband found in Rooms 1 or 5)

Item 1: loose marijuana found in Room 4

Item 2: glass pipe found in Room 4

Item 3: plastic container with scale and plastic baggies found in Room 4

Item 4: digital scale found in Room 4

Item 5: LCSD patch found in Room 4

Item 6: plastic bag with marijuana and **two plastic bags with suspected methamphetamine** found in Room 4

Item 7: **plastic Bag with suspected methamphetamine** found in Room 4

Item 8: assorted ammunition in Room 2

Item 9: two ammo cans found in Room 3

Item 10: Remington model 1100 (serial number L327526V) found in Room 4

Item 11: Winchester .22 (serial number B1312321) found in Room 4

Item 12: Motorola cell phone found in Room 4

Item 13: Browning .22 (no serial number) found in Room 4

Item 14: Winchester model 1906 .22 (no serial number) found in Room 4

Item 15: black plate carrier with plates found in Room 3

Item 16: ammo and magazine found in Room 3

Item 17: two 30-round magazines with ammo and three empty magazines found in Room 6

Item 18: Diamondback Arms AR-15 (serial number DB1834975) found in Room 4

Item 19: Marlin .22 (serial number 09356023) found in Room 4

Item 20: Sauer western six-shooter (serial number A1 7186) found in Room 4

Item 21: Ruger sr22 (serial number 37686421) with a magazine containing seven .22 rounds found in Room 4

Item 22: pill bottle with unknown capsules found in Room 4

Item 23: three empty assault rifle magazines found in Room 3

Item 24: ballistic panels found in Room 3

Item 25: US Currency found on Clifford Kyzer

Item 26: plate carrier found in Pathfinder

Item 27: plastic bag containing green plant material found in red in color Mustang

Item 28: glass pipe found in red in color Mustang

- KYZER claimed everything in the residence post-*Miranda*. The suspected methamphetamine was sent to the Drug Enforcement Administration (DEA) lab and came back at **407.3 grams of methamphetamine with 100% purity**.

Source statements:

There are two significant source statements that have been deemed credible through the independent corroboration of various assertions throughout their statements.

- One source informed ATF that KYZER drove to Greenville on four or five occasions to pick up a kilogram of methamphetamine at Matthew WARD's direction. This source also said that a female (who the source believed to be Kelly JORDAN) delivered a kilogram of methamphetamine to KYZER's residence on four occasions.
- A second source identified KYZER as an active participant in WARD's firearm trafficking operation.

Kelly JORDAN: (21 U.S.C. § 841(b)(1)(A))

On March 6, 2019, Kelly JORDAN was pulled over after leaving Clifford KYZER's residence. Inside the vehicle, deputies located 2,099 grams of methamphetamine, two loaded firearms, and \$12,560 in US currency. The following briefly describes JORDAN's criminal conduct.

- **March 6, 2019:**

- o On March 6, 2019, Deputy Burnette with LCSD stopped Kelly JORDAN for failure to maintain her lane while driving her 2000 red Ford Mustang. JORDAN continued driving into a parking lot and through the parking lot before spinning out of control. JORDAN then took off on foot with her purse before being detained. The passenger was initially detained, but escaped police custody and fled on foot. Inside the vehicle, deputies located 2,099 grams of methamphetamine stored in several plastic bags inside of a backpack located in the backseat passenger compartment. Deputies also found a loaded Glock 22 .40 caliber pistol (serial number DFL012US) with 19 rounds of .40 caliber ammunition in plain view on the passenger seat and a loaded Taurus 709 slim .380 caliber pistol (serial number TKN00070) with seven rounds of .380 ammunition in the glovebox. Deputies additionally located a total of \$12,560 in US currency in JORDAN's purse and her vehicle.

Source statement:

A source of information deemed credible through the independent corroboration of various assertions throughout the source's statement informed agents that someone (who the source believed to be JORDAN) delivered kilogram quantities of methamphetamine to KYZER on four occasions.

Robert FIGUEROA and Tiffanie BROOKS: (21 U.S.C. § 841(b)(1)(A))

Robert FIGUEROA and Tiffanie BROOKS were arrested on May 23, 2019, with over two kilograms of a mixture or substance containing a detectable amount of methamphetamine, approximately \$3,000 in US currency, and multiple firearms after being pulled over for erratic driving. Following their arrest, agents learned that FIGUEROA was traveling to the Atlanta area regularly to pick up significant quantities of methamphetamine. Agents further uncovered FIGUEROA's connection to other named and unnamed members of this drug conspiracy. The following briefly describes FIGUEROA and BROOKS's criminal conduct.

- **May 23, 2019:**

- o Robert FIGUEROA and Tiffanie BROOKS were stopped by a Cayce Police Department Officer for erratic driving and making illegal turns. FIGUEROA was the driver, and BROOKS was the passenger. They both appeared nervous, and FIGUEROA kept reaching by the center console. They had conflicting stories about where they were headed. The officer asked for consent to search, which was denied. A K-9 drug detection dog was quickly on scene and was deployed. During this time, FIGUEROA granted consent for the officer to retrieve FIGUEROA's keys from the center console. When the officer opened the door, the officer found a glass jar containing approximately 212 grams of a suspected controlled substance that the lab has since confirmed contained both heroin and methamphetamine.

During the open-air sniff, the K-9 alerted at the driver's door pocket, center console, and both floorboards. Officers found a large jar under the driver's seat containing suspected methamphetamine and another jar in the passenger's seat by BROOKS's purse, which also contained suspected methamphetamine. The suspected methamphetamine tested positive at the lab and weighed a total of 308 grams. Officers also located marijuana in the backseat, along with US currency. In addition to the drugs and money, the officers located a loaded Smith & Wesson, model SD40 VE, .40 caliber pistol (serial number: FZP7580) between the driver's seat and the center console.

BROOKS was interviewed and waived her *Miranda* rights. During her statement, BROOKS told officers that there were additional drugs in the hotel room where they were staying (Cloverleaf Suites, 150 Stoneridge Drive, Room 1621 Columbia, South Carolina). Officers obtained a search warrant for the hotel room and found:

- 20.078 grams of Fentanyl (lab tested)
- 1,667 grams of methamphetamine (lab tested)
- 123 methamphetamine pills (approximately 40 grams) (lab tested)
- Sig Sauer, model P220, .45 caliber pistol (serial number: G267870)
- Sig Sauer, model mosquito, .22 caliber pistol (serial number: F108304)
- Two rounds of .45 caliber ammunition
- Two digital scales
- Approximately \$3,000 in US currency

Source statements:

A source provided information deemed credible through independent corroboration that FIGUEROA had been making several runs to Atlanta during the months of April and May 2019 and was regularly selling ounce quantities or more of methamphetamine at a time. The source also knew FIGUEROA to have previously sold methamphetamine to an unnamed member of this conspiracy.

Conclusion

Therefore, based upon the information set forth in this Affidavit, I respectfully submit that there is probable cause to believe that the above-named individuals participated in a conspiracy to possess with intent to distribute and distribute methamphetamine, a violation of 21 U.S.C. §§ 841(a)(1) and 846, from on or about July 1, 2017, through October 1, 2019. As such, I respectfully request that this Court issue a Criminal Complaint and Arrest Warrant for the above-named individuals.

Assistant United States Attorney Justin Holloway has reviewed this affidavit.

Appeared & sworn by telephone

Rosalie R. Herberger

Rosalie R. Herberger
Special Agent, ATF

by telephone

Sworn to and subscribed before me this 11 day of September, 2020.


The Honorable Kevin F. McDonald
United States Magistrate Judge