

2. It was a part and an object of the conspiracy that WILLIE SIMS, a/k/a "Black," MAURICE ELLIS, ISAAC MALLORY, a/k/a "Face," HAKIM ANDERSON, a/k/a "Hak," and RAHMEL GARRAWAY, a/k/a "Major," the defendants, and others known and unknown, would and did distribute, and possess with the intent to distribute, controlled substances, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances that WILLIE SIMS, a/k/a "Black," MAURICE ELLIS, ISAAC MALLORY, a/k/a "Face," HAKIM ANDERSON, a/k/a "Hak," and RAHMEL GARRAWAY, a/k/a "Major," the defendants, conspired to distribute and to possess with the intent to distribute were 28 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Narcotics Trafficking)

4. On or about March 14, 2019, in the Southern District of New York, WILLIE SIMS, a/k/a "Black," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that SIMS distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C))

COUNT THREE

(Narcotics Trafficking)

5. On or about May 31, 2019, in the Southern District of New York, MAURICE ELLIS, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that ELLIS distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and
841(b)(1)(C))

COUNT FOUR

(Narcotics Trafficking)

6. On or about August 30, 2019, in the Southern District of New York, ISAAC MALLORY, a/k/a "Face," and RAHMEL GARRAWAY, a/k/a "Major," the defendants, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that MALLORY and GARRAWAY distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and
841(b)(1)(C))

COUNT FIVE

(Narcotics Trafficking)

7. On or about September 6, 2019, in the Southern District of New York, WILLIE SIMS, a/k/a "Black," and ISAAC MALLORY, a/k/a "Face," the defendants, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that SIMS and MALLORY distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and
841(b)(1)(C))

COUNT SIX

(Narcotics Trafficking)

8. On or about September 11, 2019, in the Southern District of New York, ISAAC MALLORY, a/k/a "Face," and HAKIM ANDERSON, a/k/a "Hak," the defendants, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that MALLORY and ANDERSON distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of

Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and
841(b)(1)(C))

COUNT SEVEN

(Narcotics Trafficking)

9. On or about September 12, 2019, in the Southern District of New York, MAURICE ELLIS, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that ELLIS distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and
841(b)(1)(C))

COUNT EIGHT

(Narcotics Trafficking)

10. On or about September 13, 2019, in the Southern District of New York, ISAAC MALLORY, a/k/a "Face," and HAKIM ANDERSON, a/k/a "Hak," the defendants, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that MALLORY and ANDERSON distributed and possessed with intent to distribute contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and
841(b)(1)(C))

COUNT NINE

(Narcotics Trafficking)

11. On or about September 16, 2019, in the Southern District of New York, WILLIE SIMS, a/k/a "Black," and ISAAC MALLORY, a/k/a "Face," the defendants, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance. The controlled substance that SIMS and MALLORY distributed and possessed with intent to distribute

contained a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C))

The bases for my knowledge and the foregoing charges are, in part, as follows:

12. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. My duties and responsibilities include the investigation of narcotics offenses, among other crimes. I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

13. Since at least in or about March 2019, the FBI, the Peekskill Police Department, and the Westchester County Police Department have been investigating various individuals who distribute narcotics in and around Peekskill, New York. A confidential informant ("CI-1") identified WILLIE SIMS, a/k/a "Black," MAURICE ELLIS, ISAAC MALLORY, a/k/a "Face," HAKIM ANDERSON, a/k/a "Hak," and RAHMEL GARRAWAY, a/k/a "Major," the defendants, as individuals that he had been buying crack cocaine from for at least the past one and a half to two years.¹ In addition, CI-1 told law enforcement that ELLIS works with SIMS and sells crack cocaine on his behalf. Based on this information, law enforcement conducted a series of controlled buys from SIMS, ELLIS, MALLORY, ANDERSON, and GARRAWAY, as discussed below.

14. Based on my review of police reports, my conversations with other law enforcement officers, and my personal participation in surveillance of the controlled buy, I

¹CI-1 has prior arrests and convictions for drug offenses. The information provided by CI-1 has been corroborated and proven reliable. CI-1 is being paid by law enforcement for his assistance.

know that, on or about March 14, 2019, in Peekskill, New York, WILLIE SIMS, a/k/a "Black," the defendant, sold CI-1 a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

15. Based on my review of police reports and an audio recording of the controlled buy and on my conversations with other law enforcement officers who surveilled the controlled buy, I know that, on or about May 31, 2019, CI-1 called the phone he had previously used to contact WILLIE SIMS, a/k/a "Black," the defendant, in order to arrange to purchase crack cocaine. When CI-1 arrived at the pre-determined location, he was met by MAURICE ELLIS, the defendant, instead of SIMS. ELLIS stated, in sum and substance, that they would need to travel to meet another individual ("CC-1") in order to obtain the crack cocaine. After traveling to meet CC-1, in Peekskill, New York, ELLIS sold CI-1 a quantity of a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

16. Based on my review of police reports and an audio recording of the controlled buy, my conversations with other law enforcement officers, and my personal participation in surveillance of the controlled buy, I know that, on or about August 30, 2019, CI-1 arranged to purchase crack cocaine from ISAAC MALLORY, a/k/a "Face," the defendant. CI-1 picked up MALLORY in his car, and MALLORY told CI-1, in sum and substance, that they needed to go see his cousin, who cooks the crack cocaine for him. They then traveled to an apartment in Peekskill, New York. According to CI-1, based on his previous crack cocaine purchases, this apartment is where RAHMEL GARRAWAY, a/k/a "Major," the defendant, cooks and holds crack cocaine for MALLORY. Law enforcement officers watched MALLORY enter the apartment and then return to CI-1's car with GARRAWAY. After CI-1 and MALLORY dropped off GARRAWAY, MALLORY sold CI-1 approximately 10 grams of a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

17. Based on my review of police reports and an audio recording of the controlled buy, my conversations with other law enforcement officers, and my personal participation in surveillance of the controlled buy, I know that, on or about September 6, 2019, CI-1 arranged to purchase crack cocaine from ISAAC MALLORY, a/k/a "Face," the defendant. CI-1 picked up MALLORY in his car, and MALLORY told CI-1, in sum and substance,

that they needed to get the crack cocaine from "Black." According to CI-1, "Black" is the nickname for WILLIE SIMS, a/k/a "Black," the defendant. CI-1 and MALLORY traveled to meet SIMS in Peekskill, New York. Once they arrived, law enforcement officers watched MALLORY leave CI-1's car and meet with SIMS in another car. MALLORY then returned to CI-1's car and sold him approximately 15 grams of a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

18. Based on my review of police reports and an audio recording of the controlled buy, my conversations with other law enforcement officers, and my personal participation in surveillance of the controlled buy, I know that, on or about September 11, 2019, CI-1 arranged to purchase crack cocaine from ISAAC MALLORY, a/k/a "Face," the defendant. CI-1 picked up MALLORY in his car, and MALLORY told CI-1, in sum and substance, that they needed to get the crack cocaine from "Hak." According to CI-1, "Hak" is the nickname for HAKIM ANDERSON, a/k/a "Hak," the defendant. CI-1 and MALLORY traveled to meet ANDERSON in Cortlandt, New York (which is near Peekskill, New York). Once they arrived, law enforcement officers watched MALLORY leave CI-1's car and meet with ANDERSON, who was in another car. MALLORY then returned to CI-1's car and sold him approximately 20 grams of a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

19. Based on my review of police reports and my conversations with other law enforcement officers who surveilled the controlled buy, I know that, on or about September 12, 2019, in Cortlandt, New York, MAURICE ELLIS, the defendant, sold a substance appearing to be crack cocaine to another confidential informant ("CI-2").² Field tests indicated the substance was, in fact, crack cocaine.

20. Based on my review of police reports and an audio recording of the controlled buy, my conversations with other law enforcement officers, and my personal participation in surveillance of the controlled buy, I know that, on or about September 13, 2019, CI-1 arranged to purchase crack cocaine from ISAAC MALLORY, a/k/a "Face," the defendant. CI-1 picked up

² CI-2 has prior arrests and convictions for drug offenses. The information provided by CI-2 has been corroborated and proven reliable. CI-2 is being paid by law enforcement for his assistance.


MALLORY in his car, and they traveled to meet HAKIM ANDERSON, a/k/a "Hak," the defendant, in Cortlandt, New York. Once they arrived, law enforcement officers watched MALLORY meet with ANDERSON in ANDERSON's car. MALLORY then returned to CI-1's car and sold him approximately 20 grams of a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

21. Based on my review of police reports and an audio recording of the controlled buy, my conversations with other law enforcement officers, and my personal participation in surveillance of the controlled buy, I know that, on or about September 16, 2019, CI-1 arranged to purchase crack cocaine from ISAAC MALLORY, a/k/a "Face," the defendant. CI-1 picked up MALLORY in his car, and they traveled to meet WILLIE SIMS, a/k/a "Black," the defendant, in Peekskill, New York. Once they arrived, law enforcement officers watched MALLORY leave CI-1's car and enter SIMS' car. MALLORY then left SIMS' car, returned to CI-1's car, and sold CI-1 approximately 20 grams of a substance appearing to be crack cocaine. Field tests indicated that the substance was, in fact, crack cocaine.

22. I have reviewed toll records for WILLIE SIMS, a/k/a "Black," MAURICE ELLIS, ISAAC MALLORY, a/k/a "Face," HAKIM ANDERSON, a/k/a "Hak," and RAHMEL GARRAWAY, a/k/a "Major," the defendants.³ Those records show contacts between SIMS and ELLIS, SIMS and MALLORY, SIMS and GARRAWAY, MALLORY and ANDERSON, and MALLORY and GARRAWAY during the time period from March 2019 to September 2019.

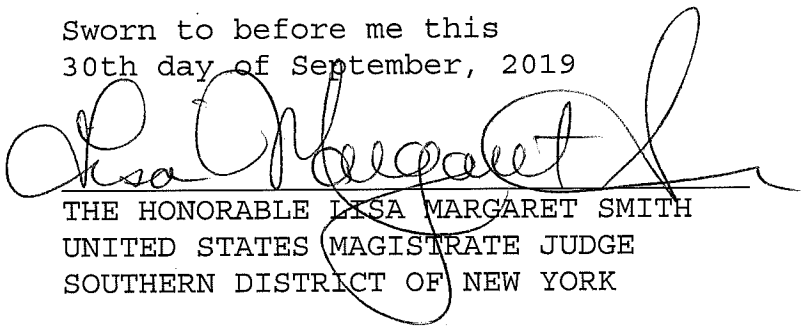
³Law enforcement identified the defendants' telephone numbers through the CIs and the controlled buys. In addition, based on my conversations with U.S. Probation Officers, I know that MALLORY identified the same telephone number to U.S. Probation.

WHEREFORE, deponent respectfully requests that WILLIE SIMS, a/k/a "Black," MAURICE ELLIS, ISAAC MALLORY, a/k/a "Face," HAKIM ANDERSON, a/k/a "Hak," and RAHMEL GARRAWAY, a/k/a "Major," the defendants, be imprisoned or bailed, as the case may be.



SPECIAL AGENT JEREMY DELLAPIA
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me this
30th day of September, 2019



THE HONORABLE LISA MARGARET SMITH
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK