

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

United States of America)

v.)

David Bone, Stacey Caksackkar, Troy Chew, Colby Criswell,)
Thomas Dacus, Stacy Edwards, Jason Glisson, Frederick)
Johnson, Crystal Lee, Draper Lee, Nicholas Grant Mealer,)
Tammy Mealer, Madison Middlebrook, Michael Newson,)
Shawn Sherry Overton, Shawn Riley, and Ronald Solomon)

Case No. 1:20-cr-10038-STA

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 October 2019 until on or about May 26, 2020 in the county of Dyer in the
Western District of Tennessee, the defendant(s) violated:*Code Section**Offense Description*18 USC 922(g)(1) & 924(a)(2)
21 USC 841(a)(1) & 846Convicted felon in possession of a firearm
Drug trafficking

This criminal complaint is based on these facts:

Please see Attachment A, affidavit of SA Wes Mayes, FBI, which is attached hereto and fully incorporated herein by reference.

☒ Continued on the attached sheet.Wes Mayes*Complainant's signature*

SA Wes Mayes, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/23/2020s/Jon A. York*Judge's signature*City and state: Jackson, Tennessee

Jon A. York, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Wes Mayes, being duly sworn, state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Memphis, Tennessee Division, Jackson Resident Agency. As such, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). I have been a Special Agent of the FBI for over seventeen years, having been previously assigned to the Miami Division from February of 2003 to March of 2009, and have since been assigned to the Memphis Division. During this time, I have primarily been assigned investigations dealing with violent crimes and the importation and distribution of illegal drugs, to include cocaine, "crack" cocaine, methamphetamine, ecstasy, heroin, and marijuana. During those investigations, I have conducted physical surveillance, electronic surveillance, wire surveillance, oversaw controlled purchases of illegal narcotics and firearms, and executed search warrants. I have also arrested many individuals for various drug violations and have spoken with numerous drug dealers, gang members, and informants concerning the methods and practices of drug traffickers. Prior to being employed by the FBI, I served as a police officer in Gatlinburg, Tennessee, for approximately three years and three months. I was a uniformed police officer and was responsible for responding to emergency calls, initiating investigations, conducting witness and subject interviews, and participating in surveillance operations and arrests. My responsibilities as a federal law enforcement officer include the investigation of violations of Federal Law including violations of Title 18 and Title 21 of the United States Code. Further, my duties include,

but are not limited to, the execution of orders issued by the court, the execution of search warrants, the seizure of proceeds associated with the illegal distribution of controlled substances, firearms violations, and making affidavits to the court and affecting arrests for violations of federal law.

2. This affidavit is to solely form the basis of probable cause that the listed individuals committed violations of federal law. There are additional facts known to your affiant, including interviews of certain subjects, which are not included within this affidavit, due to the public nature of this document. That information potentially would jeopardize the ongoing nature of this investigation, and potentially compromise the safety of the individuals who were interviewed during the investigation.

SUBJECTS

3. David Bone, hereinafter “BONE”, is a United States citizen with a date of birth of November 1, 1965. Bone is believed to reside in Dyer County Tennessee. Bone has multiple arrests, to include felony convictions for theft of property and burglary.

4. Stacey Caksackkar, hereinafter “CAKSACKKAR”, is a United States citizen with a date of birth of February 9, 1968. CAKSACKKAR is believed to reside in Crockett County Tennessee. CAKSACKKAR has multiple arrests, to include possession of schedule VI, failure to appear, sell of methamphetamine, and violation of probation.

5. Troy Chew, hereinafter “CHEW”, is a United States citizen with a date of birth of June 27, 1975. CHEW is believed to reside in Blytheville, Arkansas. CHEW has multiple arrests, to include a federal conviction for distribution of cocaine. Your affiant has spoken with CHEW’s federal probation officer and was advised CHEW was on federal supervised release until June 30, 2020.

6. Colby Criswell, hereinafter “CRISWELL”, is a United States citizen with a date of birth

July 29, 1991. CRISWELL is believed to reside in the West Tennessee area. CRISWELL has multiple arrests, to include assault, possession of methamphetamine, and failure to report.

7. Thomas Dacus, hereinafter “DACUS”, is a United States citizen with a date of birth February 26, 1977. DACUS is believed to reside in Crockett County Tennessee. DACUS has multiple arrests, to include felony convictions for promoting manufacture methamphetamine, schedule II drugs, vandalism, and possession of methamphetamine. DACUS is currently on state parole.

8. Stacy Edwards, hereinafter “EDWARDS”, is a United States citizen with a date of birth April 12, 1989. EDWARDS is believed to reside in Dyer County Tennessee. EDWARDS has multiple arrests, to include felony convictions for possession of cocaine and robbery.

9. Jason Glisson, hereinafter “GLISSON”, is a United States citizen with a date of birth December 11, 1977. GLISSON is believed to reside in Dyer County Tennessee. GLISSON has multiple arrests for possession of methamphetamine, possession of a weapon, and failure to appear. GLISSON is currently on community corrections.

10. Frederick Johnson, hereinafter “JOHNSON”, is a United States citizen with a date of birth June 7, 1984. JOHNSON is currently incarcerated in a Mississippi state prison. JOHNSON has multiple arrests, to include retaliating against a witness, probation violation, assault on a police officer, and armed robbery. JOHNSON is currently incarcerated after being convicted of two counts of manslaughter and possession of a firearm by a convicted felon.

11. Crystal Lee, hereinafter “CRYSTAL”, is a United States citizen with a date of birth November 20, 1982. CRYSTAL has multiple arrests, to include aggravated burglary, theft of property, violation of probation, and failure to appear. CRYSTAL was also arrested on July 20, 2020 and charged with possession of methamphetamine and possession of a firearm. CRYSTAL

is being held on her recent charge at Crockett County Jail.

12. Draper Lee, hereinafter “DRAPER”, is a United States citizen with a date of birth May 23, 1981. DRAPER is currently incarcerated at Crockett County Jail. DRAPER has multiple arrests, to include felony convictions for aggravated burglary and possession of methamphetamine.

13. Nicholas Grant Mealer, hereinafter “GRANT”, is a United States citizen with a date of birth October 25, 1998. GRANT is believed to reside in Crockett County Tennessee. GRANT has multiple arrests, to include felony convictions for aggravated burglary and reckless endangerment where a deadly weapon was involved. GRANT is currently on state probation.

14. Tammy Mealer, hereinafter “TAMMY”, is a United States citizen with a date of birth May 12, 1970. TAMMY is believed to reside in Crockett County Tennessee. TAMMY has multiple arrests, to include providing a handgun to a juvenile, shoplifting, and failure to appear.

15. Madison Middlebrook, hereinafter “MIDDLEBROOK”, is a United States citizen with a date of birth February 25, 1999. MIDDLEBROOK is believed to reside in Blytheville, Arkansas. MIDDLEBROOK has multiple arrests, to include aggravated assault, tampering with evidence, possession of methamphetamine with intent to sell, and possession of a firearm in commission of a dangerous felony.

16. Michael Newson, hereinafter “NEWSON”, is a United States citizen with a date of birth December 16, 1984. NEWSON is believed to reside in the North Mississippi area. NEWSON has multiple arrests, to include felony convictions for possession of controlled substance with intent to sell and manslaughter.

17. Shawn Sherry Overton, hereinafter “OVERTON”, is a United States citizen with a date of birth July 2, 1975. OVERTON is believed to reside in Dyer County Tennessee. OVERTON has multiple arrests, to include theft of property, criminal impersonation, violation of

probation, failure to appear, possession of schedule II, and DUI.

18. Shawn Riley, hereinafter “RILEY”, is a United States citizen with a date of birth July 23, 1979. RILEY is believed to reside in Dyer County Tennessee. RILEY has multiple arrests, to include disorderly conduct, public intoxication, burglary, possession of a weapon, failure to appear, and probation violation.

19. Ronald Solomon, hereinafter “SOLOMON”, is a United States citizen with a date of birth March 7, 1980. SOLOMON is believed to reside in Dyer County Tennessee. SOLOMON has multiple arrests, to include armed robbery, burglary, aggravated assault, possession of drugs, and conspiracy to bring marijuana into a jail facility.

CONTROLLED PURCHASES

20. A confidential source (CS1) was utilized and multiple controlled purchases of methamphetamine were purchased from DRAPER. Specifically, the following dates were the controlled purchases with DRAPER, as well as the laboratory analysis:

- A. January 23, 2020, approximately 27.03 grams of methamphetamine at 92% purity.
- B. January 27, 2020, approximately 27.61 grams of methamphetamine at 100% purity.
- C. January 27, 2020, approximately 22.82 grams of methamphetamine at 97.9% purity.
- D. February 3, 2020, approximately 27.88 grams of methamphetamine at 97.8% purity.
- E. February 3, 2020, approximately 27.78 grams of methamphetamine at 94.9% purity.
- F. February 10, 2020, approximately 55.69 grams of methamphetamine at 95.3% purity.
- G. March 2, 2020, approximately 27.81 grams of methamphetamine at 99.9% purity.

21. Additionally, on March 2, 2020, CS1 was utilized and conducted a controlled purchase of a firearm from DRAPER. Specifically, CS1 provided DRAPER with \$250 in exchange for a Rossi/Taurus .38 Special revolver, bearing serial number GM730713. DRAPER is a convicted

felon and is prohibited from possessing a firearm.

22. A confidential source (CS2) was utilized and multiple controlled purchases of methamphetamine were purchased from OVERTON. Specifically, the following dates were the controlled purchases with OVERTON, as well as the laboratory analysis:

A. April 8, 2020, approximately 3.35 grams of methamphetamine at 99% purity.

B. April 10, 2020, approximately 6.838 grams of methamphetamine at 44% purity.

23. A confidential source (CS3) was utilized and a controlled purchase of methamphetamine was purchased from CRYSTAL. Specifically, the following date was the controlled purchase with CRYSTAL, as well as the laboratory analysis:

A. May 12, 2020, approximately 6.01 grams of methamphetamine at 98% purity.

COURT ORDERED WIRE AND ELECTRONIC INTERCEPTIONS

24. On March 16, 2020, the Honorable James D. Todd, United States District Court Judge, Western District of Tennessee, signed an order authorizing the interception of wire and electronic communications occurring over DRAPER's cellular telephone. Interceptions began on March 16, 2020 and was terminated on April 10, 2020.

25. On April 8, 2020, the Honorable James D. Todd, United States District Court Judge, Western District of Tennessee, signed an order authorizing the interception of wire and electronic communications occurring over MIDDLEBROOK's cellular telephone. Interceptions began on April 9, 2020. On May 7, 2020, the Honorable James D. Todd, United States District Court Judge, Western District of Tennessee, signed an order authorizing the continued interception of wire and electronic communications occurring over MIDDLEBROOK's cellular telephone. These interceptions were terminated on May 26, 2020.

26. As a result of these interceptions, the following subjects were intercepted:

A. BONE was intercepted over the MIDDLEBROOK Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 2724 grams of methamphetamine to BONE.

B. CAKSACKKAR was intercepted over the DRAPER Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 5040 grams of methamphetamine to CAKSACKKAR.

C. CHEW was intercepted over the MIDDLEBROOK Title-III selling MIDDLEBROOK methamphetamine. This investigation can attribute approximately 476 grams of methamphetamine to CHEW.

D. CRISWELL was intercepted over the DRAPER Title-III discussing obtaining pound quantities of methamphetamine. This quantity is indicative for resale. This investigation can attribute approximately 1132 grams of methamphetamine to CRISWELL.

E. DACUS was intercepted over the DRAPER Title-III selling DRAPER methamphetamine. This investigation can attribute approximately 1680 grams of methamphetamine to DACUS.

F. EDWARDS was not intercepted over a Title-III, but was referenced over the MIDDLEBROOK Title-III in which MIDDLEBROOK and JOHNSON discuss EDWARDS making trips to Mississippi to obtain methamphetamine for re-sell. This investigation can attribute approximately 2724 grams of methamphetamine to EDWARDS.

G. GLISSON was intercepted over the MIDDLEBROOK Title-III obtaining quantities of methamphetamine indicative for resale. Additionally, on May 1, 2020, after GLISSON was intercepted obtaining methamphetamine from MIDDLEBROOK, law enforcement conducted a stop of GLISSON and recovered approximately 12.779 grams of methamphetamine at 99% purity.

This investigation can attribute approximately 224 grams of methamphetamine to GLISSON.

H. JOHNSON was intercepted over the MIDDLEBROOK Title-III facilitating multiple pound quantity methamphetamine transactions. This investigation can attribute approximately 11,350 grams of methamphetamine to JOHNSON.

I. CRYSTAL was intercepted over both the DRAPER and MIDDLEBROOK Title-III's. CRYSTAL is the wife of DRAPER and interceptions indicated her knowledge of the methamphetamine distribution activities. However, CRYSTAL was intercepted over the MIDDLEBROOK Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 84 grams of methamphetamine to CRYSTAL.

J. DRAPER was intercepted over the DRAPER Title-III obtaining and selling methamphetamine. This investigation can attribute over 5902 grams of methamphetamine to DRAPER.

K. GRANT was intercepted over the DRAPER Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 280 grams of methamphetamine to GRANT.

L. TAMMY was intercepted over the DRAPER Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 672 grams of methamphetamine to TAMMY.

M. MIDDLEBROOK was intercepted over both the DRAPER and MIDDLEBROOK Title-III's. MIDDLEBROOK was intercepted obtaining and selling methamphetamine. This investigation can attribute approximately 36,280 grams of methamphetamine to MIDDLEBROOK.

N. NEWSON was intercepted over the MIDDLEBROOK Title-III selling

MIDDLEBROOK methamphetamine. This investigation can attribute approximately 908 grams of methamphetamine to NEWSON.

O. OVERTON was intercepted over the DRAPER Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 1344 grams of methamphetamine to OVERTON.

P. RILEY was intercepted over the MIDDLEBROOK Title-III obtaining quantities of methamphetamine indicative for resale. This investigation can attribute approximately 2252 grams of methamphetamine to RILEY.

Q. SOLOMON was intercepted over the MIDDLEBROOK Title-III. SOLOMON assisted MIDDLEBROOK in the storing of methamphetamine at his residence. SOLOMON was also intercepted assisting MIDDLEBROOK with methamphetamine distribution. SOLOMON would reach out to individuals to secure methamphetamine for MIDDLEBROOK to purchase for redistribution and SOLOMON would travel to various locations to obtain methamphetamine for MIDDLEBROOK and himself. This investigation can attribute approximately 1832 grams of methamphetamine to SOLOMON.

SEARCH WARRANTS FOR RESIDENCES

27. On April 9, 2020, a federal search warrant was executed at DRAPER's residence, located at 749 Henry Johnson Road, Alamo, Tennessee. As a result of this search, the following items were seized:

- A. 81.32 grams of methamphetamine at 97% purity
- B. Taurus, 9mm pistol, model TH9C, bearing serial number TLW24333
- C. Savage, .22 caliber rifle, model 120A, bearing serial number P352675
- D. Remington, 12 gauge shotgun, model 1100, bearing serial number 1503V

E. Ranger Arms, .22 caliber rifle, bearing no serial number

28. On May 26, 2020, a federal search warrant was executed at SOLOMON's residence, located at 629 Butterworth Avenue, Dyersburg, Tennessee. As a result of this search, the following item was seized:

A. Ruger, 9mm pistol, model SR9C, bearing serial number 332-18495

29. On May 26, 2020, a federal search warrant was executed at MIDDLEBROOK's residence, located at 515 Walnut Avenue, Dyersburg, Tennessee. As a result of this search, the following items was seized:

A. Suspected marijuana (laboratory analysis pending)

B. \$11,702 in U.S. currency

C. Digital scale

30. On May 26, 2020, a federal search warrant was executed at MIDDLEBROOK's father's residence, located at 5002 Cypress Drive, Blytheville, Arkansas. As a result of this search, the following items was seized:

A. Smith & Wesson, 9mm pistol, model SW9VE, bearing serial number DSX4241

B. Glock, .45 caliber pistol, model 30S, bearing serial number TRF799

C. \$19,400 in U.S. currency.

MIDDLEBROOK's father, Charles Middlebrook, provided a verbal and written statement advising the two firearms and U.S. currency belonged to his son, MIDDLEBROOK.

SEARCH WARRANTS FOR FACEBOOK ACCOUNTS

31. On April 2, 2020, a federal search warrant was obtained and executed for the Facebook account of DRAPER. As a result of the records, it was determined DRAPER was communicating with individuals regarding the sale and purchase of methamphetamine. Specifically, CRISWELL

was captured communicating with DRAPER in which CRISWELL was both selling methamphetamine to DRAPER, as well as obtaining methamphetamine from DRAPER. These quantities are indicative for resale.

32. On April 30, 2020, a federal search warrant was obtained and executed for the Facebook account of MIDDLEBROOK. As a result of the records, it was determined MIDDLEBROOK was communicating with individuals regarding the sale and purchase of methamphetamine. These quantities are indicative for resale.

33. On April 30, 2020, a federal search warrant was obtained and executed for the Facebook account of JOHNSON. As a result of the records, it was determined JOHNSON is a member of the Vice Lords gang and holds the rank of Five Star Universal Elite "Glove". JOHNSON was also communicating with individuals regarding the distribution of methamphetamine. These quantities are indicative for resale.

34. On June 1, 2020, a federal search warrant was obtained and executed for the Facebook account of EDWARDS. As a result of the records, it was determined EDWARDS was communicating with individuals regarding the sale and purchase of methamphetamine. These quantities are indicative for resale.

MIDDLEBROOK's STATEMENT

35. On May 26, 2020, your affiant spoke with MIDDLEBROOK. MIDDLEBROOK provided a post Miranda statement admitting the firearms seized during the federal search warrant were his and he knew he could not possess firearms due to him being a convicted felon.

SOLOMON's STATEMENT

36. On May 26, 2020, your affiant spoke with SOLOMON. SOLOMON admitted to grabbing the firearm seized during the search warrant when he heard law enforcement breaching

his residence. He then put this firearm down when he realized it was law enforcement. SOLOMON advised he was a convicted felon and was prohibited from possessing a firearm.

37. Special Agent Wes Stilwell, of the Bureau of Alcohol Tobacco Firearms and Explosives (BATF), who is a BATF Firearms and Ammunition Interstate Nexus Agent, physically observed all of the firearms seized and listed in this affidavit. SA Stilwell determined that all of the firearms were not manufactured in the state of Tennessee, therefore had been shipped and transported in interstate commerce.

38. Based upon all of the foregoing facts, I submit that probable cause exists showing that the following individuals have committed the following offenses and respectfully request that an arrest warrant be issued for the following individuals:

David Bone; Stacey Caksackkar; Troy Chew; Colby Criswell; Thomas Dacus; Stacy Edwards; Jason Glisson; Frederick Johnson; Crystal Lee; Draper Lee; Nicholas Grant Mealer; Tammy Mealer; Madison Middlebrook; Michael Newson; Shawn Sherry Overton; Shawn Riley; and Ronald Solomon; in the Western District of Tennessee, did knowingly and intentionally combine, conspire, confederate and agree together, and with other persons both known and unknown, to unlawfully, knowingly, and intentionally distribute and possess with the intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as classified by Title 21, U.S.C. ‘ 812, all in violation of Title 21, U.S.C. ‘ ‘ 841(a)(1) and 846.

On or about March 2, 2020, in the Western District of Tennessee, **Draper Lee**, knowing he had been previously convicted of a crime punishable by more than one year imprisonment, did knowingly possess a firearm, specifically a Rossi/Taurus .38 Special revolver, in and effecting interstate commerce, in violation of 18 U.S.C. 922(g)(1) and 924(a)(2).

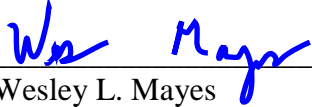
On or about April 9, 2020, in the Western District of Tennessee, **Draper Lee**, knowing he had been previously convicted of a crime punishable by more than one year imprisonment, did knowingly possess one or more of the following firearms, specifically a Taurus, model TH9C, 9mm caliber pistol, a Savage, model 120A, .22 caliber rifle, a Ranger Arms, .22 caliber rifle, and a Remington, model 1100, 12 gauge shotgun, in and effecting interstate commerce, in violation of 18 U.S.C. 922(g)(1) and 924(a)(2).


On or about May 26, 2020, in the Western District of Tennessee, **Madison Middlebrook**, knowing he had been previously convicted of a crime punishable by more than one year imprisonment, did knowingly possess one or more of the following firearms, specifically a Smith and Wesson, model SW9VE, 9mm pistol, and a Glock, model 30S, .45 caliber pistol, in and effecting interstate commerce, in violation of 18 U.S.C. 922(g)(1) and 924(a)(2).

On or about May 26, 2020, in the Western District of Tennessee, **Ronald Solomon**, knowing he had been previously convicted of a crime punishable by more than one year imprisonment, did knowingly possess a firearm, specifically a Ruger, model SR9C, 9mm pistol, in and effecting interstate commerce, in violation of 18 U.S.C. 922(g)(1) and 924(a)(2).

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Federal Rule of Criminal Procedure 41(d)(3), the undersigned judicial officer has on this date considered information communicated by ☒ telephone or ☐ other reliable electronic means or ☐ both, in reviewing and deciding whether to issue a criminal complaint. In doing so, this judicial officer has placed the affiant under oath and has confirmed by speaking personally with the affiant on the telephone ☐ that the signatures on the criminal complaint and affidavit are those of the affiant or ☒ that the affiant has authorized the placement of the affiant's signatures on the criminal complaint and affidavit, the documents received by the judicial officer are a correct and complete copy of the documents submitted by the affiant, and the information contained in the criminal complaint and affidavit are true and correct to the best of the affiant's knowledge.


Wesley L. Mayes
Special Agent
Federal Bureau of Investigation



Sworn to before me and subscribed in my presence at Jackson, Tennessee, this 23rd day of July, 2020.


s/Jon A. York

Honorable Jon A. York
United States Magistrate Judge
Western District of Tennessee