
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DIAMOND LAKE ("Dirty")
DARNELL HUDSON ("White boy"),
ANTWION WILLIAMS ("Bookie Black"),
DERRON BARTON ("Deebo"),
STEVEN MOORE ("Mann"),
ROMELL RATLIFF ("Neck"),
DEANDRE HUGHES ("Dede"),
LAWRENCE JONES ("Fish"),
TYJUAN YATES,
CLAYVON VIVETTER,
WILLIE BLAKE ("Snoop"), and
EDDIE YOUNG

CASE NUMBER:

UNDER SEAL**CRIMINAL COMPLAINT**

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

Count One

Beginning no later than November 22, 2017 and continuing through in or about October 4, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, DIAMOND LAKE, DARNELL HUDSON, ANTWION WILLIAMS, DERRON BARTON, STEVEN MOORE, ROMELL RATLIFF, DEANDRE HUGHES, LAWRENCE JONES, CLAYVON VIVETTER, WILLIE BLAKE, and EDDIE YOUNG, defendants herein:

Code Section

Title 21, United States Code, Section
846

Offense Description

Conspired to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

Count Two

On or about June 18, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,
TYJUAN YATES:

Code Section

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

Offense Description

knowingly and intentionally possessed with
intent to distribute a controlled substance,
namely, a quantity of a mixture and substance
containing a detectable amount of heroin, a
Schedule I Controlled Substance.

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.

BRIAN J. BRADLEY

Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: October 1, 2018

Judge's signature

City and state: Chicago, Illinois

M. David Weisman, U.S. Magistrate Judge

Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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AFFIDAVIT

I, BRIAN J. BRADLEY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since approximately June 2016. From 2010 through 2016, I was employed as a police officer by the Dallas Police Department in Dallas, Texas. I am currently assigned to the Chicago Division Area North Gang Taskforce, and my responsibilities include the investigation of violent organized crime, including racketeering, narcotics trafficking offenses, firearms trafficking offenses, and money laundering. As part of my responsibilities, I have been involved in the preparation of affidavits for search warrants, complaints, and court-authorized Title III interceptions.

2. The information in this affidavit is based on my participation in this investigation; information provided by other local and federal law enforcement officers (“LEOs”); information from a cooperating source; the results of physical and video surveillance; review of consensually recorded conversations and conversations interception pursuant to court orders authorizing the interception of wire and electronic communications; law enforcement reports; my training and experience; and the training and experience of other law enforcement officers with whom I have consulted. Since this affidavit is being submitted for the limited purpose of

establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

PURPOSE OF THIS AFFIDAVIT

3. This affidavit is made for the purpose of establishing probable cause in support of (a) the issuance of arrest warrants against the proposed defendants, (b) a complaint that charges as follows, as well as for the purpose of establishing, and (c) an application for a warrant to search (i) the single family residence and detached garage located at 417 Geneva Avenue, Bellwood, Illinois, including containers therein, described further in Attachment A (the “**Lake Residence**”) and (ii) the basement unit of the multi-unit residential building located at 158 North LaPorte Avenue, Chicago, Illinois (“**158 North LaPorte**”) for evidence, instrumentalities, fruits, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Sections 841 and 846.

a. Beginning no later than on or about November 22, 2017 and continuing to on or about October 4, 2018, in the Northern District of Illinois and elsewhere, defendants DARNELL HUDSON, ANTWION WILLIAMS, DERRON BARTON, STEVEN MOORE, ROMELL RATLIFF, DEANDRE HUGHES, LAWRENCE JONES, CLAYVON VIVETTER, WILLIE BLAKE, and EDDIE YOUNG did conspire with DIAMOND LAKE, each other, and with others known and unknown to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 1 kilogram or more of a mixture and

substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1), all in violation of 21 U.S.C. § 846.

b. On or about June 18, 2018, TYJUAN YATES knowingly and intentionally possessed with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

c. This Affidavit is not meant to be a complete narrative of all that has occurred in connection with this investigation, but is only a summary of facts necessary to show probable cause to support the charges, as set forth herein.

FACTS SUPPORTING PROBABLE CAUSE

I. BACKGROUND OF THE INVESTIGATION

4. The complaint is based on an investigation by the FBI, Internal Revenue Service (“IRS”) and Chicago Police Department (“CPD”) of individuals involved in the trafficking of narcotics in and around the west side of Chicago. During the investigation, LEOs developed evidence that DIAMOND LAKE and the defendants were involved in trafficking heroin for the DIAMOND LAKE Drug Trafficking Organization (“LAKE DTO”) in the Northern District of Illinois and elsewhere.

5. The information supporting probable cause set forth below includes:

a. Information derived from consensually recorded telephone conversations between a cooperating source (“CS-1”)¹ and LAKE;

¹ CS-1 has been working with FBI since December 2016. CS-1 is being paid for his/her cooperation and has been relocated in exchange for his/her cooperation. CS-1 has a criminal history that includes convictions for possession of controlled substances, manufacturing and

b. CS1's November 22, 2017, controlled purchase of 11.6 grams of heroin at **158 North LaPorte** from STEVEN MOORE; CS1's February 1, 2018 controlled purchase of 11.9 grams of heroin from LAKE, and CS1's February 14, 2018 controlled purchase of 17 grams of heroin from LAKE;

c. Information derived from court-authorized interceptions of conversations over Target Phone 1, used by LAKE; Target Phone 2, also used by LAKE; Target Phone 3, used by HUDSON; Target Phone 4, used by WILLIAMS; Target Phone 5, also used by LAKE, and Target Phone 6, used by BARTON;

d. Remote electronic surveillance and physical surveillance in the vicinity of LAKE's residence, 417 Geneva Avenue in Bellwood (the "**Lake Residence**"²) and **158 North LaPorte** in Chicago;

e. A July 17, 2018 controlled purchase by a confidential source ("CS4")³ of heroin from ROMELL RATLIFF at **158 North LaPorte**; and

delivery of a controlled substance, retail theft, forgery, deceptive practices, prostitution, and traffic offenses. CS-1 has admitted to using heroin and marijuana. Since CS-1 began cooperating, CS-1 sold prescription medication as a broker for another individual. CS-1 was admonished for this unauthorized illegal activity and no promises have been made by the FBI that CS-1 will not be prosecuted for this conduct. A substantial amount of the information provided by CS-1 has been independently corroborated by physical surveillance, consensual recordings, and information received from other law enforcement officers.

² Through remote electronic and physical surveillance, agents have observed LAKE to be present at the **Lake Residence** and have observed LAKE seeing BARTON, HUDSON and WILLIAMS in and out through the front door on numerous occasions. In addition, court-authorized location information for Target Phone 1, Target Phone 2, and Target Phone 5 (used by LAKE) has shown that the phones are located at the **Lake Residence** during all hours of the day and night.

³ CS4 has been cooperating with law enforcement since approximately June 2018. A substantial amount of the information provided by CS4 related to this investigation has been corroborated through surveillance, law enforcement databases, and consensually-recorded conversations. Based on that corroboration, CS4 has proven reliable and truthful. CS4 has prior felony convictions for narcotics possession. Although no promises have been made to

f. Narcotics seizures by law enforcement, including (i) the seizure of approximately 109 grams of heroin from YATES on June 18, 2018; (ii) the seizure of approximately 161.2 grams of suspect heroin from BARTON on July 7, 2018; (iii) the seizure of approximately 0.5 grams of suspect heroin on August 24, 2018; (iv) the seizure of approximately 0.5 grams of suspect heroin on August 30, 2018; and (v) the seizure of approximately 1.2 grams of suspect heroin on September 10, 2018.

II. ROLES OF THE DEFENDANTS

A. The Lake DTO

6. DIAMOND LAKE is the leader of a drug trafficking organization based in Chicago, Illinois (“LAKE DTO”). The LAKE DTO distributes approximately 490 grams of heroin on a weekly basis. LAKE is believed to store bulk quantities of heroin at the **Lake Residence**, where he, WILLIAMS and HUDSON prepare the heroin for street level distribution by “cutting” the heroin with a cutting agent such as diphenhydramine and packaging individual doses of heroin, stapled in tinfoil and contained inside a mini zip lock bag. BARTON, WILLIAMS and HUDSON then bundle the individual uses and bring the distribution quantities of the packaged heroin to street-level distributors, collect narcotics cash proceeds from the distributors, and deliver the narcotics proceeds to LAKE.

7. As described below, certain members of the LAKE DTO distribute heroin from a residence located at **158 North LaPorte** in Chicago. At this residence,

CS4, he/she is cooperating in exchange for monetary compensation. For CS4’s cooperation in this investigation to date, the FBI has paid CS4 a total of approximately \$450.

individual purchasers can approach and purchase user quantities of heroin in exchange for cash. The LAKE DTO members responsible for distribution at **158 North LaPorte** take turns being supplied with heroin by HUDSON, WILLIAMS or BARTON. After the LAKE DTO member sells all of his heroin, the next DTO member is supplied. Each DTO member must turn over the proceeds of his narcotics distributions to BARTON, WILLIAMS or HUDSON in order to be resupplied with heroin when it is his turn in the rotation.

8. The LAKE DTO also distributes to and through other DTO members, who in turn distribute to unknown customers in the Chicago area and who also turn their proceeds over to BARTON, WILLIAMS or HUDSON, before they can be resupplied with additional heroin.

9. Between May 7, 2018 and October 2, 2018, the LAKE DTO distributed at least 10 kilograms of heroin to individual customers on the west side of Chicago.

B. The Defendants

10. BARTON, WILLIAMS and HUDSON act as managers for the LAKE DTO and are responsible for running the day-to-day narcotics sales operations for the LAKE DTO. Once the heroin is cut, prepared and packaged for sale to individual users, HUDSON and BARTON are primarily responsible for supplying the LAKE DTO's network of distributors with the heroin and collecting proceeds from the sale of the heroin to return to LAKE.

11. STEVEN MOORE, ROMELL RATLIFF, DEANDRE HUGHES, LAWRENCE JONES, CLAYVON VIVETTER, WILLIE BLAKE, EDDIE YOUNG,

and others distribute the LAKE DTO's heroin and turn their proceeds over to the LAKE DTO. After receiving heroin from HUDSON, BARTON and WILLIAMS, they are responsible for selling the heroin to individual customers and turning the proceeds in to BARTON, HUDSON or WILLIAMS before they are re-supplied with additional heroin.

12. DIAMOND LAKE worked with DARNELL HUDSON and ANTWION WILLIAMS to prepare and package wholesale amounts of heroin for street level sales at the **Lake Residence**. LAKE then directed HUDSON, WILLIAMS and DERRON BARTON to distribute the packaged heroin from his residence to co-conspirators, who in turn distributed the heroin to individual customers from various locations on the west side of Chicago, and gave the proceeds from their distribution of narcotics to HUDSON, WILLIAMS and BARTON to take back to LAKE.

13. DARNELL HUDSON worked with DIAMOND LAKE and ANTWION WILLIAMS to prepare and package heroin for street level sales at the **Lake Residence**. HUDSON distributed the packaged heroin to co-conspirators for redistribution as well as directly to individual customers, at LAKE's direction. HUDSON also collected narcotics proceeds for LAKE.

14. ANTWION WILLIAMS worked with DIAMOND LAKE and DARNELL HUDSON to prepare and package wholesale amounts of heroin for street level sales at the **Lake Residence**. WILLIAMS distributed the packaged heroin, at LAKE's direction, from the **Lake Residence** to various locations on the west side of Chicago,

where it was sold to consumers. WILLIAMS also collected narcotics proceeds for LAKE.

15. DERRON BARTON is a narcotics courier who obtained narcotics from the **Lake Residence**, and transported it, at LAKE's direction, to other DTO members for distribution on the west side of Chicago. BARTON also collected narcotics proceeds for DIAMOND LAKE.

16. STEVEN MOORE was a street level distributor for the LAKE DTO. MOORE sold narcotics for the LAKE DTO from **158 North LaPorte**, with RATLIFF, HUGHES, and VIVETTER, and turned the cash proceeds of his narcotics sales over to HUDSON, WILLIAMS and BARTON.

17. ROMELL RATLIFF was a street level distributor for the LAKE DTO. RATLIFF sold narcotics for the LAKE DTO from **158 North LaPorte**, with HUGHES, MOORE, and VIVETTER, and turned the cash proceeds of his narcotics sales over to HUDSON, WILLIAMS and BARTON.

18. DEANDRE HUGHES was a street level distributor for the LAKE DTO. HUGHES sold narcotics for the LAKE DTO from **158 North LaPorte**, with RATLIFF, MOORE, and VIVETTER, and turned the cash proceeds of his narcotics sales over to HUDSON, WILLIAMS and BARTON.

19. CLAYVON VIVETTER was a street level distributor for the LAKE DTO. VIVETTER sold narcotics for the LAKE DTO from **158 North LaPorte**, with RATLIFF, MOORE, and HUGHES, and turned the cash proceeds of his narcotics sales over to HUDSON, WILLIAMS and BARTON.

20. LAWRENCE JONES was a street level distributor for the LAKE DTO. JONES obtained packaged narcotics from DARNELL HUDSON and DERRON BARTON and distributed the narcotics, on behalf of the LAKE DTO, to individual customers in and around 5000 West Maypole Avenue, Chicago, Illinois. JONES turned the cash proceeds of his narcotics sales over to HUDSON and BARTON.

21. EDDIE YOUNG obtained packaged narcotics from, and turned proceeds over to, DARNELL HUDSON and DERRON BARTON. YOUNG sold narcotics on the 4800 block of West Quincy Street, Chicago, Illinois.

22. WILLIE BLAKE obtained packaged narcotics from, and turned proceeds over to, DARNELL HUDSON and DERRON BARTON. BLAKE sold narcotics on the 4800 block of West Quincy Street, Chicago, Illinois.

III. THE LAKE DTO'S NARCOTICS TRAFFICKING ACTIVITIES

A. CS1's Controlled Purchases of Heroin from LAKE

23. As described below, in November 2017, CS purchased heroin from MOORE at **158 North LaPorte**. Later, CS1 discussed the transaction in a consensually recorded text message conversation with LAKE. On two occasions in February 2017, CS1 conducted controlled purchases of distribution quantities of heroin from LAKE. Each time, CS1 arranged the transactions with LAKE directly, and met LAKE to exchange currency for the agreed upon quantity of heroin.

On November 22, 2017 CS1 purchased 20 blows of heroin at 158 North LaPorte.

24. On or about November 22, 2017, CS1 conducted a controlled purchase of heroin at the residence located at **158 North LaPorte**, which, according to CS1, was

controlled by LAKE. Prior to the transaction, CS1 met with law enforcement agents. CS1 and CS1's car were searched for contraband and excess amounts of currency with negative results, and CS1 was equipped with a concealed audio-video recording device and transmitter and \$200.

25. At approximately 11:16 a.m., CS1 arrived in CS1's vehicle at **158 North LaPorte** in Chicago. Surveillance agents observed CS1 approach an unknown female at the front gate of the property. According to CS1, and as captured by the video recording the unknown female told CS1 that no one was home. Shortly thereafter, however, an unknown male appeared in a second floor window, and the female told CS1 his name was "Man." Approximately one minute later, agents observed the unknown male open the front door and step out onto the front porch. According to CS1, and as captured by the video recording, the unknown male instructed CS1 to come through the gate to the front porch, which agents observed CS1 do.

26. On the front porch, according to CS1 and as captured by the recording, CS1 told the unknown male that he wanted "two whole jabs," referring to two dozen "blows," or individual servings, of heroin. CS1 showed the male the \$200 in his possession and the unknown male asked, "how much is that?" CS1 responded that it was \$200. The unknown male stated, "two jabs ain't no deuce [two jabs don't cost \$200], two jabs [cost] \$240. It's 14 each one [14 individual uses in each jab], it ain't 12." CS1 asked how much he could by for \$200 and the unknown male responded, "11 [individual uses of heroin] for each hundred." CS1 agreed.

27. The unknown male went back inside the residence and, approximately two minutes later, returned to the front porch, where he gave CS1 two clear plastic bags, each containing ten smaller clear plastic bags, with black figures printed on them, containing small packets of tinfoil. The suspected heroin with the packaging weighed approximately 11.6 grams. The suspected heroin was sent to the DEA laboratory. The DEA Laboratory tested 15 of the 20 found the 15 bags to contain a total of approximately 4.8 grams of heroin.

28. After the transaction, law enforcement compared the images of the unknown male on CS1's video recording with CPD booking photos, and identified him as Steven Moore ("MOORE"). Subsequently, agents showed CS1 several booking photos, including the photo of MOORE, and CS1 identified MOORE as the individual who sold him heroin at **158 North LaPorte** on November 22, 2017.

29. On December 10, 2017, at approximately 10:52 a.m., CS1 exchanged the following recorded⁴ text messages with LAKE, who was using Target Phone 1:⁵

⁴ FBI agents recorded the text messages described in paragraph 25, occurring December 10, 2017, by taking a photograph of them during debrief meeting with CS1 on December 13, 2017. Agents were not able to record the text messages contemporaneously because CS1 was unable to take a screenshot with CS1's phone. CS1 did, however, remain in contact with agents during the time CS1 was communicating with LAKE, and related the content of the text message communications with Target Phone 1 to agents over the phone, so that agents could continue to monitor and supervise CS1's interaction with Target Phone 1. Agents also obtained toll records for the telephone number used by CS1, which showed that, during the same time period, there were no texts or calls between CS1 and Target Phone 1 that were not reported to agents.

⁵ Agents identified LAKE as the user of Target Phone 1 based on information provided by CS-1. In addition, agents who had previously viewed known photographs of LAKE, recognized LAKE as the individual who arrived at the time and place discussed in the intercepted conversations to conduct the narcotics transactions with CS1 described in this Affidavit. Further, court authorized location information for Target Phone 1 has shown it to be located consistently at the **Lake Residence**, during both day and night time hours.

CS1: A bro you out

LAKE: No. ill be out tomorrow

CS1: Bro dude on LaPorte with the dreads and that other n**** got some slick ass mouths [CS1 referred to the November 22 transaction on LaPorte] ⁶

LAKE: What happened now my nig

CS1: Shit bro I go buy 2 jabs [two dozen individual servings of heroin] then we had a few words it ain't shit bro

LAKE: Ill get on top of it tomorrow

LAKE: But I still got you, i havent forgot about you [LAKE is still willing to provide heroin directly to CS1]

CS1: That [the November 22 transaction on LaPorte] ain't shit bro it's good

LAKE: OK.

⁶ Some of the consensually recorded conversations and text messages (“recorded conversations”) have been summarized in this Affidavit. The language that is quoted from the recorded conversations throughout this Affidavit is based upon a preliminary review of the recorded conversations, and not final transcripts of the recorded conversations. The times listed for the recorded conversations are approximate. The summaries do not include all statements or topics covered during the course of the recorded conversations. At various points in the Affidavit I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on information received from CS1, the contents and context of the recorded conversations, events that took place before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

On February 1, 2018, LAKE distributed 10.1 grams of heroin to CS1 in exchange for \$1000.

30. On or about February 1, 2018, at approximately 7:21 a.m., CS1 exchanged the following consensually recorded text messages with LAKE, who was using Target Phone 1:⁷

CS1: Bro my shit hit the card at at 12:00 last night when you gon be ready.

LAKE: What up playboy

CS1: Wassup homie im ready for you bro [CS1 was ready to purchase more heroin from LAKE] what time you gon be ready.

LAKE: Ok.

CS1: If that lick [the heroin] anywhere close [in quality] to what you gave me im finna cash in. This phone line finna take off bro.

LAKE: Its the same thing [the heroin is from the same source or of the same quality].

CS1: Bro you ain't finna believe this shit im finna get on bro it's crunch time. Man it took a while but I appreciate you giving me a chance bro I won't let you down on my life.

⁷ FBI agents recorded the text messages described in paragraph 26, occurring February 1, 2017, by taking a photograph of them during debrief meetings with CS1 on February 1, 2017. Agents also obtained toll records for the telephone number used by CS1, which showed that, during the same time period, there were no texts or calls between CS1 and Target Phone 1 that were not reported.

31. At approximately 1:23 p.m., CS1 exchanged the following consensually recorded text messages with LAKE, who was using Target Phone 1:

CS1: How does 2:00 sound bro can that happen.

LAKE: Ok.

CS1: So is 2 good bro.

LAKE, Ill be around 3.

CS1: OK just hit the line bro.

32. At approximately 3:01 p.m., agents searched CS1's person for any contraband or excess amounts of currency with negative results. CS1 was equipped with audio and video recording equipment and provided \$1,000.00 to purchase heroin from LAKE. Shortly thereafter, agents drove CS1 to the apartment complex located at 1325 North Parkside Avenue and maintained surveillance of the building while CS1 waited inside.

33. Between approximately 2:45 p.m. and 3:30 p.m., CS1 and LAKE, who was using Target Phone 1, continued to exchange consensually recorded text messages regarding what time LAKE would meet CS1 to conduct the narcotics transaction. At approximately 4:42 p.m., CS1 sent a recorded text message to LAKE instructing LAKE to meet CS1 at "Parkside and Potomac... Im at the crib homie 1325."

34. At approximately 6:10 p.m., CS1 received a phone call from LAKE, who was using Target Phone 1.⁸ CS1 used a handheld recording device to record the phone call. However, because CS1 was waiting for LAKE in the vestibule of an apartment building, in public view, agents instructed CS1 to leave the recording device in CS1's pocket, so as not to arouse suspicion that could endanger CS1 or the investigation. As a result, the recording device captured only CS1's half of the conversation, and LAKE's responses, though audible, were largely unintelligible. Based on the recording and my conversations with CS1, CS1 stated, "What's up home?" According to CS1, LAKE advised that he was exiting at Central Avenue. CS1 stated, "aight. you know I'm waiting, man. Hey bro I'm not fucking with nobody, bro." According to CS1, LAKE stated that the traffic was bad. CS1 replied, "I definitely understand. I just appreciate you, homey. I ain't tripping at all, yo." According to CS1, LAKE made a statement to the effect that he would follow through with the planned narcotics transaction. CS1 stated, "I already know you a man of your word. You know what I'm saying? Like I say yo, it took a while but it happened." According to CS1, LAKE responded to the effect that he would arrive shortly. CS1 stated, "Aight, bro," and the call was terminated.

35. At approximately 6:25 p.m., CS1 sent a consensually recorded text message to LAKE, who was using Target Phone 1, which stated, "Im finna step out you should be pulling up by now." LAKE responded, "Yea." At approximately 6:30

⁸ Agents verified that CS1 received this phone call from Target Phone 1 through toll information for Target Phone 1.

p.m., agents observed a silver Toyota Corolla driving Northbound on Parkside Avenue. According to information provided by Enterprise Rent-A-Car, the Corolla was a rental vehicle rented in LAKE's alias, "Diamond Jones."⁹ Law enforcement officers had previously viewed a driver's license photograph of LAKE and recognized the driver of the Toyota as LAKE. Law enforcement officers observed the Corolla stop in the street in front of 1300 North Parkside.

36. Law enforcement officers observed CS1 exit the apartment complex and approach the Corolla. CS1 entered the front passenger seat of the Corolla. According to CS1, and as captured by the audio recording, CS1 gave LAKE \$1,000, and stated, "I'll be glad when I'll be able to give you 10,000." LAKE then began counting the money. LAKE asked CS1, "what's this?" CS1 said, "what it's supposed to be, n***a." LAKE said, "ok, ok." CS1 said, "I be glad when it be 10, n***a." LAKE gave CS1 a clear plastic bag containing a white powder substance, suspected heroin, and replied, "Hey, so whatever you do that's how I'm gonna do it." CS1 said, "I already know it. What's understood need not be explained, pimp." LAKE said, "Aight, sorry for the wait." CS1 said, "Man, listen man, I'll wait on you any day, homie." LAKE said, "Aight." CS1 exited the vehicle and LAKE left the location northbound on Parkside Avenue.

37. Based on my review of the audio video recording, my training and experience, the context of the conversation, previous consensually recorded

⁹ According to Secretary of State databases, LAKE legally changed his name to "Diamond Jones" and currently holds a driver's license in the name "Diamond Jones."

conversations between CS1 and LAKE, and my conversations with CS1, I believe that CS1 told LAKE that CS1 intended to continue purchasing greater quantities of heroin from LAKE in order to turn greater profits. LAKE told CS1 that he would make future deliveries of heroin to CS1 in the same manner, and CS1 agreed.

38. After the transaction, CS1 gave agents the bag of suspect heroin CS1 obtained from LAKE. The bag of suspect heroin, with packaging, weighed approximately 11.9 grams. The heroin was submitted to the DEA laboratory for weighing and testing and confirmed to contain 10.1 grams of heroin.

39. At approximately 10:26 p.m., on the same day as the above transaction, LAKE followed up with CS1 by text message.

LAKE: What up.

CS1: Out here networking [selling heroin] they love it bro.

LAKE: Thats what up.

On or about February 14, 2018, LAKE distributed 13.8 grams of heroin to CS1 in exchange for \$2,000.

40. On or about February 12, 2018, at approximately 7:27 p.m., CS1 exchanged the following recorded text messages with LAKE, who was using Target Phone 1:¹⁰

¹⁰ On February 12, 2018, agents provided CS1 with a new phone that used the same phone number CS1 had previously used to contact LAKE on Target Phone 1. All text messages sent to and from the phone were simultaneously sent to a computer which could only be accessed by agents, so that every incoming and outgoing text message was recorded automatically. The remainder of the text message conversations described in this Affidavit were recorded this way.

CS1: Bro I'll be ready Wednesday at like 12:00 the same 10 [10 grams of heroin]. I got shot in the ass Thursday night so that slowed me up.¹¹ But I'm about ready now and of course my money right I keep a G on deck Bro [CS1 had \$1,000]

LAKE: Ok

LAKE: What

LAKE: Is you alright

CS1: Yea I'm good a lil sore but im straight

LAKE: Ok

LAKE: And what you trying to do [how much heroin did CS1 wish to purchase]

CS1: 10 bro [10 grams of heroin] the same way as last time [CS1 referred to the February 1, 2018 transaction]

LAKE: Ok

41. On or about February 13, 2018, at approximately 9:28 p.m., CS1 exchanged the following recorded text messages with Target Phone 1:

LAKE: 1500 [LAKE wanted CS1 to purchase \$1,500 worth of heroin from LAKE]

CS1: No homie the same thing as last time 10 bro [CS1 wanted 10 grams of heroin]

¹¹ According to CS1, CS1 was the victim of an armed robbery on February 8, 2018. CS1 sustained a gunshot wound to his/her buttocks while attempting to flee from the robber. According to CS1, CS1 did not report this incident to the police or seek medical treatment.

LAKE: But 4 gave you 10 [CS1 purchased 10 grams of heroin from LAKE on 2/1/2018. LAKE believed that CS1 should have made enough profit from street sales of the 10 grams of heroin, that CS1 should now be able to purchase \$1,500 worth of heroin from LAKE.]

CS1: OK I see what you saying yeah we good [CS1 agreed to purchase \$1500 worth of heroin]

LAKE: Ok

CS1: I got some stacks on deck no problem playboy 2 bucks [CS1 had \$2,000] so

CS1: 2 bucks [\$2000] ain't no money bro I'm for real with this shit

42. On or about February 14, 2018, at approximately 10:41 a.m., CS1 exchanged the following recorded text messages with Target Phone 1:

LAKE: What up playboy.

CS1: I'm ready for you I got 2 bucks [\$2,000] on me so I'm waiting on you

LAKE: Ok

CS1: How long you think you gon be.

CS1: You know it's Valentine's Day so I gotta do some running

43. On the same day, at approximately 11:13 a.m., CS1 attempted to call LAKE on Target Phone 1. LAKE did not answer. Between approximately 11:13 a.m. and 5:00 p.m., CS1 and LAKE, who was using Target Phone 1, continued to exchange text messages about the timing of the narcotics transaction.

44. Later the same day, an agent searched CS1's person for contraband and excessive amounts of currency with negative results. CS1 was equipped with audio and video recording equipment and provided \$2,000 to purchase heroin from LAKE. Shortly thereafter, agents drove CS1 to the 1300 block of North Parkside Avenue, and maintained surveillance of CS1 as CS1 waited for LAKE inside the apartment complex located at 1325 North Parkside Avenue.

45. At approximately 4:13 p.m., CS1 exchanged the following recorded text messages with Target Phone 1:

CS1: You about close bro

CS1: Yooo homie you about here yet

LAKE: Yea

46. About an hour later, at approximately 5:19 p.m., agents observed a gray Nissan Juke parked in front of 1325 North Parkside Avenue. Agents heard the gray Nissan honk its horn and observed CS1 approach the vehicle. CS1 opened the front passenger door of the vehicle, but did not enter. According to CS1 and as captured on the recording, LAKE was talking to someone on the phone and had a digital scale on his right leg. LAKE pointed to the phone he held at his ear and then at the front passenger seat, where there was a clear sandwich bag containing two knotted clear sandwich bags, that each contained a white powder substance. CS1 put \$2,000 on the seat and retrieved the bag containing the white powder substance from the seat. CS1 told LAKE to call CS1 later, and LAKE said, "Ok." CS1 closed the door and LAKE departed the area.

47. After the transaction, CS1 gave agents the bag of suspect heroin CS1 obtained from LAKE. The bag of suspect heroin, with packaging, weighed approximately 17.0 grams. The suspect heroin was submitted to the DEA laboratory for weighing and testing, and confirmed to contain 11.5 grams of heroin.

48. At approximately 5:32 p.m., CS1 received a consensually recorded text message from LAKE, who was using Target Phone 1, which stated, "Im here to be great." CS1 responded, "And I appreciate all you do bro." At approximately 8:14 p.m., LAKE replied, "You welcome."

B. June 18, 2018 Seizure of Heroin from YATES

49. On June 18, 2018, LAKE was contacted by an individual who identified himself as "Berta's" cousin (later identified as YATES) who wished to obtain heroin from LAKE. LAKE responded that he would send someone to bring the narcotics to YATES. At the time, HUDSON was at the **Lake Residence** with LAKE. Shortly after the call between YATES and LAKE, agents observed HUDSON leave the **Lake Residence**, travel to the 4000 block of West Fulton street, and meet with YATES. After HUDSON departed, officers stopped YATES and recovered a clear plastic bag containing four smaller plastic bags which contained approximately 109 grams of heroin (with packaging). YATES was released without charging. Following the seizure, agents intercepted conversations during which YATES, LAKE and HUDSON discussed the seizure.

50. On or about June 18, 2018, at approximately 9:32 a.m. (Sessions 3745, 3752-3765), LAKE, who was using Target Phone 1, exchanged the following electronic

communications with TYJUAN YATES¹², who was using telephone number 773-469-0756 (“Yates Phone 1”):

YATES: What up playboy this Berta cousin

LAKE: What up playboy

YATES: Need to see you

LAKE: When

YATES: Now

YATES: By my grandma house

LAKE: Im going to send my homie [HUDSON] at you

YATES: Cool

LAKE: Because I’m tired [tied] up at the moment

YATES: Ok

LAKE: Ok

YATES: How long

LAKE: Now

YATES: Ok

LAKE: Ok

¹² Agents identified YATES as the user of 773-469-0756 based on the events they observed on surveillance, which are described below, in combination with intercepted conversations. Namely, surveillance agents identified YATES as the individual who met with HUDSON to conduct what agents believe to have been narcotics transactions at LAKE’s direction.

51. On the same day, toll information for Target Phone 3,¹³ used by HUDSON, showed that HUDSON called YATES at approximately 11:42 a.m.

52. On the same day, at approximately 11:47 a.m., surveillance agents observed HUDSON exit LAKE's residence in Bellwood, Illinois, carrying a soda can, enter his vehicle and drive away. Agents maintained surveillance of HUDSON.

53. Toll information for Target Phone 3 showed that HUDSON called YATES at approximately 11:49 a.m., 12:06 p.m., and 12:10 p.m.

54. At approximately 12:11 p.m., surveillance agents observed HUDSON stop the vehicle at approximately 4411 West Fulton Street. As HUDSON parked, a male later identified as YATES exited the front door of 4440 West Fulton Street. YATES walked off the porch and towards HUDSON's vehicle. At approximately 12:14 p.m., surveillance agents observed HUDSON drive away, and YATES walk westbound in the street towards 4440 West Fulton Street. Toll information for Target Phone 3 showed that HUDSON called YATES at approximately 12:11 p.m. and 12:12 p.m., and YATES called HUDSON twice at approximately 12:12 p.m.

55. At approximately 12:16 p.m., law enforcement officers observed YATES enter the driver's side of a blue Hyundai sedan parked in front of 4440 West Fulton Street. Once inside the vehicle, law enforcement officers observed YATES make furtive gestures toward the passenger compartment. Law enforcement officers approached the vehicle and, for officer safety, requested that YATES step out of the

¹³ HUDSON was identified as the user of Target Phone 3 through a combination of physical surveillance and intercepted calls, during which HUDSON was observed to arrive to conduct a transaction discussed in intercepted conversations.

vehicle, which YATES did. As YATES exited the vehicle, a law enforcement officer observed a large bulge in YATES's shorts pocket. The law enforcement officer asked YATES if he had any contraband on his person, and YATES responded that he did and pointed to his left pocket. From his vantage point, the law enforcement officer was able to see that YATES' left pocket contained a clear plastic bag containing a white powdery substance, which the officer recognized through his training and experience to be suspected heroin. The officer seized the plastic bag from YATES's pocket and discovered that it contained four clear bags that each contained a white powdery substance, suspected to be heroin. YATES also provided his name, date of birth and phone number to the law enforcement officer, who released YATES without charging. The suspected heroin weighed approximately 109.0 grams with packaging. The suspected heroin was sent to the DEA laboratory for analysis. The substance tested positive for heroin.

56. On or about June 18, 2018, at approximately 12:37 p.m. (Session 3796-3799), LAKE, who was using Target Phone 1, exchanged the following electronic communications with YATES, who was using Yates Phone 1:

YATES: I need to talk to u asap

YATES: Finna go buy another phone

LAKE: Ok

LAKE: What up

57. On or about June 18, 2018, at approximately 12:51 p.m. (Session 3804), TYJUAN YATES, who was using 630-294-6310 ("Yates Phone 2")¹⁴, had a conversation with LAKE, who was using Target Phone 1, during which YATES reported to LAKE that he had been stopped by law enforcement and the drugs delivered at LAKE's direction had been seized.

a. YATES stated, "I swear to God I've been in the house all motherfucking day long. I came outside earlier, came outside earlier, busted a move, and been in the house all day, waiting on you, waiting on you right?" LAKE replied, "Right." YATES stated, "When uh, when your homie [HUDSON] called me and tell me he was, he was pulling up I come onto the porch, [YATES talking in the background: Hold on, hold on. Hey give me the number two. I swear to God, Give me a number two with Sprite.] Diamond you heard me?" LAKE responded, "I'm listening."

b. YATES stated, "Yeah, Swear to God so, I come on the porch, I leave my phone upstairs because he [HUDSON] said he'd be there in like 5 minutes so I just come on the porch waiting on him to pull up right. There's a car like down the street, I'm looking at the car. So there's a white motherf***er in the car [HUDSON], well I'm looking at the car like who the fuck is this in this car. I had my window open upstairs so I heard the phone ring so I go, I go back upstairs grab the

¹⁴ Agents identified YATES as the user of 630-294-6310 based on the events they observed on surveillance, in combination with the intercepted conversations described in this Affidavit, including Session 3796-3799, where YATES stated, "Finna go buy another phone." The CPD enforcement officers that stopped YATES also recognized the voice of the user of 630-294-6310 as YATES.

phone and it was him [HUDSON] calling. He was parked like down the street like all the way down, I ain't seen him. He's [HUDSON] like I'm down the street shit, so now, I'm like, alright here I come right now. I go back on the porch, when I go back on the porch the car pulled up right past me so I'm just sitting on the porch just sitting there. The car turns the corner, I see ya I go down there. I was literally talking to this man [HUDSON], you can ask him, I talked to this man like maybe 10 seconds, maybe. I gave him the bread [money], he gave me the shit [heroin], words, a couple words here and there, I walk off. I'm walking down, now I had cross back in front of the street back on [unintelligible] side. I get like, like right by grandma crib, I'm going to my house though. Black transformer [Chicago Police Department unmarked squad car] turn the corner, you hear me?... So I'm like, I'm, I'm walking to my car. I done got in the car, them bitches [Chicago Police officers] pull right up in front of me, block me off, get out the car. I'm looking like shit, what the fuck you all doing? Got me out the car, swear to God he [the officer] was like, where it's at? ... I'm like, shit it's [the heroin is] in my pocket. Literally nothing I could have did, nothing, swear to God on my momma grave. I'm like I'm stuck, I'm like what the fuck. The police went in my pocket, brought me out of the car, didn't put no handcuffs on me, none of that shit. Took the shit [heroin], took my phone, my ID was in the car. Took my I... got my ID but my my uh ID, it ain't got my, ain't got my address on it, it got grandma address on it. ... Swear to God the man took my ID, wrote my motherfucking name down, took my phone, called, the called his number off my phone I swear to God and said you

owe me one and pulled off. You hear me?" LAKE replied, "Right. No." YATES said, "Huh?" LAKE stated, "I said we'll talk."

c. YATES replied, "Call him [HUDSON] and see if he, I don't know if they [the police] followed him [HUDSON], I don't know that's what I'm saying, I don't know. I ain't did shit. I've been in the house all fucking day. All fucking day." LAKE replied, "We all good." YATES stated, "Huh?" LAKE responded, "We good." YATES asked, "Yeah? What you think?" LAKE replied, "I don't know, better I talk to you in person." YATES stated, "Man, call me soon. I meet you somewhere, man." LAKE said, "Alright."

58. On or about June 18, 2018, at approximately 1:07 p.m., LAKE, who was using Target Phone 1, exchanged the following electronic communications with YATES, who was using Yates Phone 2 (Session 3807, 3812-3815).

YATES: Whats gone happen now

YATES: Yo

LAKE: I dont know

LAKE: What up

YATES: Tryna see whats going on cause i owe u money

59. Based on my training and experience, and my knowledge of the investigation, including the previous seizure and intercepted calls, I believe YATES told LAKE he owed LAKE money for the drugs that were seized.

60. On or about June 20, 2018, at approximately 10:25 a.m. (Sessions: 3905, 3907, 3939-3942, 3960-3970, 3974-3977), LAKE, who was using Target Phone 1,

exchanged the following electronic communications with YATES, who was using Yates Phone 2:

YATES: Wasnt my fault, nothing i coulda did

YATES: What up playboy

LAKE: Aint nobody blaming nobody

LAKE: Mistake happens

LAKE: Its all about how you now move going forward

YATES: What up

YATES: What do u want me to do

LAKE: Nothing far as we go

YATES: Its over?

LAKE: But for you, you need to get out of your comfort zone and take things more serious

LAKE: Because in this game we playing with our lives

YATES: I feel u

LAKE: Ok

YATES: Let me know

LAKE: But im still here for you

YATES: I need [heroin] u

LAKE: Ok

YATES: Ok

YATES: Today

C. July 7, 2018 Seizure of Heroin from BARTON

61. On July 6, 2018, agents observed through remote surveillance BARTON visit the **Lake Residence**, entering through the front door and departing several minutes later. On July 7, 2018, agents conducted a traffic stop of BARTON and arrested BARTON on an outstanding warrant. An inventory search of BARTON's vehicle revealed approximately 280 small ziplock bags containing suspected heroin, packaged for individual distribution and bunched together in larger plastic bags.

62. On July 6, 2018 at approximately 8:23 a.m., agents observed BARTON driving a 2002 green Honda Accord, Illinois registration 947129, park on the street across from the **Lake Residence**. Toll records show that BARTON was in contact with Target Phone 1, used by LAKE, at approximately 7:34 a.m., 7:56 a.m., 7:57 a.m., 7:59 a.m., 8:00 a.m., 8:23 a.m., and 8:34 a.m. At approximately 8:35 a.m., through remote electronic surveillance, agents observed BARTON exit the vehicle and walk in the front door of the **Lake Residence**. BARTON exited LAKE's residence at approximately 8:49 a.m., enter the Honda, and depart the area.

63. The following day, on July 7, 2018, at approximately 11:51 a.m., surveillance agents observed BARTON driving his black Honda Accord north on the 600 block of South Austin Boulevard. Agents were aware of an active warrant for BARTON's arrest and observed BARTON fail to use a turn signal. CPD officers conducted a traffic stop of BARTON's vehicle. BARTON identified himself as Derron BARTON and was taken into custody. Officers performed an inventory search of BARTON's vehicle pursuant to CPD policy and found, in the center console, two

knotted clear plastic bags that held two more knotted clear plastic bags that each held five smaller knotted clear plastic bags that each held 14 miniature ziplock bags. Each of the 14 miniature ziplock bags was stapled on the top, had a "yin yang" symbol printed on it, and contained suspected heroin wrapped in tinfoil. Approximately 280 small ziplock bags containing suspected tinfoil-wrapped heroin were recovered. The total weight of the suspected heroin, with packaging, was approximately 161.2 grams. The suspected heroin was submitted to the DEA Laboratory for weighing and analysis and results are pending.

D. July 17, 2018 Controlled Purchase of Heroin from RATLIFF

64. On or about July 17, 2018 CS4 conducted a controlled purchase of approximately three grams of heroin at **158 North LaPorte** from ROMELL RATLIFF.

65. At approximately 11:49 a.m., agents met with CS4 at a predetermined location and searched CS4 for contraband and excessive amounts of currency with negative results. Agents also equipped CS4 with an audio video recording device and gave CS4 \$50 with which to conduct the transaction. Shortly thereafter, agents maintained surveillance of CS4 as CS4 drove/walked to **158 North LaPorte**. Agents observed CS4 approach the front porch and engage in conversation with ROMELL RATLIFF, whose appearance agents were familiar with because they had previously viewed known photographs of RATLIFF.

66. According to CS4 and as captured by the recording device, CS4 stated, "5" and told RATLIFF to keep one dollar for "squares [cigarettes]." RATLIFF asked

CS4, “You want D [heroin] or squares [cigarettes]? Which one you want? Tell me? You want the good or the bad?” CS4 responded, “You right,” and gave RATLIFF \$50. RATLIFF distributed to CS4 five small clear stapled plastic bags with yin yang symbols printed on them, which each contained a powdery substance wrapped in tinfoil.

67. CS4 walked away from the porch. Agents maintained surveillance of CS4 until they met CS4 at the predetermined meeting location. There, agents took custody of the recording device and the heroin CS4 purchased from RATLIFF. Agents also searched CS4 for contraband and excessive amounts of currency with negative results. The narcotics that CS4 purchased from RATLIFF were consistent with the packaging of the heroin seized from BARTON’s vehicle on July 7, 2018, field tested positive for the presence of heroin, and were sent to the DEA laboratory for weighing and analysis, and results are pending.

E. September 13, 2018 Seizure of Heroin from JONES

68. On or about September 13, 2018, agents intercepted conversations during which HUDSON agreed to meet with JONES to provide narcotics. Following the call, agents observed HUDSON travel to the 200 block of North LaPorte, where JONES entered HUDSON’s vehicle and exited shortly thereafter. After HUDSON departed the area, law enforcement officers stopped JONES and arrested JONES for an active parole violation warrant. During a search of JONES incident to arrest, agents found a clear plastic bag containing eight pieces of tinfoil, which each

contained suspect heroin. In total, the suspected heroin weighed approximately 3.3 grams with packaging.

69. On or about September 13, 2018, at approximately 2:42 p.m. (Session 3014), JONES, who was using 708-655-8164 (“Jones Phone 2”),¹⁵ had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES asked HUDSON to provide him with heroin. JONES answered, “Hello?” HUDSON stated, “What up church?” JONES stated, “What up, Lord?” HUDSON stated, “Nothing, what you doing for it?” JONES stated, “You know, getting the bread.” [Making money selling narcotics] HUDSON stated, “You dig?” JONES stated, “You dig?” HUDSON stated, “Hey, your uncle [LAKE] said he gonna need that by the end of the month.” [LAKE had HUDSON tell JONES that JONES needed to turn over the profits for the narcotics he had been provided by the end of the month.] JONES stated, “Oh, Aight. Uh... I'm still working on it, I got some for him. [UI] it's a deuce [\$2,000], right?” [JONES hasn't sold all of the narcotics yet. JONES confirmed he owed LAKE \$2,000] HUDSON stated, “Huh? Yup.” JONES stated, “Aight, aight, aight, aight, aight, aight. I'll get it at you, man.” HUDSON stated, “Nothing.” JONES stated, “Aight. Ain't nothing going? You ain't got nothing for me?” [Does HUDSON have more heroin for JONES] HUDSON stated, “Yeah I do, but I had- I ain't got it in nothing.” [The heroin HUDSON has is not packaged in individual bags] JONES stated, “Huh?” HUDSON stated, “I ain't got it in nothing.” JONES stated, “Shit, uh...

¹⁵ Agents identified JONES as the user of telephone number 708-655-8164 based on the following: At the time of JONES's arrest on September 13, 2018 JONES had a telephone in his possession. Agents called 708-655-8164 and the telephone in JONES possession rang.

that don't matter... shit." HUDSON stated, "Who?" JONES stated, "That don't matter." HUDSON stated, "Who got it?" JONES's response was unintelligible. HUDSON responded, "Who was that?" JONES stated, "I say, that don't matter that you ain't got it in nothing." [JONES did not care that the heroin was not in individual bags] HUDSON stated, "You said it don't matter?" JONES stated, "Yeah." HUDSON stated, "Oh okay. Give me about 20- give me about 30 minutes." JONES stated, "Aight."

70. On or about September 13, 2018, at approximately 3:28 p.m. (Session 3016), JONES, who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES and HUDSON discussed meeting to complete a narcotics transaction. JONES answered, "What's up, Cuz? Where you at?" HUDSON stated, "I'm on my way right now." JONES stated, "Alright, I'm on [5017 West] Maypole [Avenue]." HUDSON stated, "Okay."

71. On or about September 13, 2018, at approximately 3:38 p.m. (Session 3019), JONES, who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES and HUDSON discussed meeting to complete a narcotics transaction. HUDSON stated, "Hey, Church. Give me a minute. I had to make a run right quick." [HUDSON took his child to get a haircut] JONES stated, "Okay, then. Just get me back." HUDSON stated, "Soon as I get through, I'm a holla at you." JONES stated, "Alright, hit me when you get back."

72. On or about September 13, 2018, at approximately 5:17 p.m. (Session 3027), JONES, who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. HUDSON stated, "Yo, where you at with it?" JONES stated, "I'm still on Maypole cuz, I'm waiting on you." HUDSON stated, "Huh?" JONES stated, "I'm on Maypole waiting on you." HUDSON stated, "I'm on my way, where on Maypole?" JONES stated, "Lavergne, before you get to Lavergne. You know where I be at." HUDSON stated, "Okay."

73. On or about September 13, 2018, at approximately 5:29 p.m. (Session 3030), JONES, who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. JONES stated, "Yeah Sane." HUDSON stated, "Yeah, the police sitting over there." [A CPD unmarked squad car was parked at an elementary school across the street from JONES's residence, 5017 West Maypole Avenue.] JONES stated, "Over where?" HUDSON stated, "By the school." JONES stated, "Where you at now?" HUDSON stated, "On my block." [214 North LaPorte] JONES stated, "Okay here I come." HUDSON stated, "Just sitting on the side of the school." JONES stated, "Huh? Aight, here I come."

74. At approximately 5:30 p.m., HUDSON's white Pontiac Grand Prix parked on the street in front of approximately 214 North LaPorte, Chicago, Illinois. JONES exited the basement apartment of 5017 West Maypole Avenue, got on a bicycle and rode eastbound on West Maypole Avenue. JONES rode up to HUDSON's vehicle and got in the back seat behind HUDSON, who was seated in the driver's seat. Shortly after entering the vehicle, JONES exited the vehicle, got back on the

bicycle and rode westbound on West Maypole Avenue. After JONES exited the vehicle, HUDSON drove away from the location.

75. Minutes later, JONES was stopped by law enforcement at approximately 4957 West Maypole Avenue. Law enforcement had prior knowledge that JONES had an active Illinois Department of Corrections Parole violation. The warrant was confirmed and JONES was taken into custody. A search of JONES incident to arrest was conducted by law enforcement. JONES had a clear plastic bag containing eight pieces of folded tinfoil in his right shoe. The tinfoil was found to contain a brown powdery substance, suspected to be heroin. The brown powdery substance field tested positive for the presence of heroin and weighed 3.3 grams with the tinfoil packaging. The suspected heroin has been submitted to the DEA laboratory for confirmatory analysis and results are pending. JONES was arrested for the parole violation and was not charged with heroin possession.

76. On the same day, at approximately 7:05 p.m. (Sessions 3045, 3046, 3057-3068), HUDSON, who was using Target Phone 3, exchanged the following electronic communications discussing the seizure with LAKE, who was using Target Phone 5:

HUDSON: They said fish went to jail tim bother just told me

HUDSON: ["Thumbs up emoji"]

LAKE: Ok

LAKE: And when was this

HUDSON: Around about 5 or 6

LAKE: OK

LAKE: Do you know where [JONES was] at [when he was arrested]

LAKE: OK

HUDSON: Maypole

LAKE: And what

LAKE: Good looking [Thank you for advising about JONES's arrest]

LAKE: We on top of it [LAKE will figure out who will take JONES's place distributing narcotics]

HUDSON: Lavergne

LAKE: OK

77. On the same day, at approximately 8:20 p.m. (Sessions 4086, 4808, 4810, 4812, 4814, 4816, 4832, 4834, 4836, 4840, 4842, 4844, 4846, 4848, 4852, 4856, 4862), BARTON, who was using 773-703-4809 ("Barton Phone 3"),¹⁶ exchanged the following electronic communications discussing the seizure with LAKE, who was using Target Phone 5:

LAKE What up playboy

BARTON: What up cuz

LAKE: I just heard fish [JONES] got pinched

LAKE: Don't know if it's true or not

¹⁶ Law enforcement identified BARTON as the user of 773-703-4809 based on the following: Target Phone 6 was deactivated due to non-payment on September 10, 2018. The same day 773-703-4809 text messaged LAKE on Target Phone 5, stating "Just giving u the line." In addition, agents recognized BARTON's voice both from the July 7, 2018 arrest and from previous intercepted conversations.

BARTON: Let me check

LAKE: Check on him whenever you get the chance

BARTON: I heard he [JONES] wasn't checking in [with his Parole Officer]

LAKE: Aw

BARTON: Im hit you back when I hear

LAKE: For parole

LAKE: Ok

BARTON: Yeah

LAKE: Ok

LAKE: We can't have him invested if he ain't handling his personal business like that

BARTON: Yeah I [kn]ow

LAKE: So you got to start asking more questions about things because if we don't it only going to cost us since they ain't thinking like they should

BARTON: ok

LAKE: OK

78. Based on my training and experience, knowledge of the investigation and intercepted phone calls, I believe that HUDSON alerted LAKE to the seizure; LAKE assured HUDSON he would arrange to have someone else distribute in JONES's place; and LAKE told BARTON that BARTON needs to look more carefully

into the background of narcotics distributors before allowing them to sell narcotics for the LAKE DTO.

F. The LAKE DTO's Use of the Lake Residence to Prepare, Package and Store Narcotics for Distribution

79. As described in further detail below, LAKE stores bulk quantities of narcotics at the **Lake Residence**. LAKE cuts the heroin with a cutting agent such as diphenhydramine, and receives regular reports from Individual A on the quality and potency of the batches of heroin that he produces. LAKE meets with WILLIAMS and HUDSON most weekdays to prepare and package the heroin for distribution. The LAKE DTO uses distinctive packaging – namely, by wrapping them in tinfoil, placing the square of tinfoil in a small plastic zip lock bag, and stapling the bag. LAKE stores the heroin at the **Lake Residence**, and HUDSON, WILLIAMS and BARTON visit the **Lake Residence** to obtain additional distribution quantities to distribute to the lower level DTO members.

a. Patterns of conduct observed on surveillance.

80. Through remote electronic surveillance established in the vicinity of the **Lake Residence**, law enforcement officers have observed that, on most weekday mornings between January 2018 and August 8, 2018, at or around 8:30 a.m., law enforcement officers observed WILLIAMS and HUDSON arrive separately at the **Lake Residence**, walk up the driveway and to the side of the **Lake Residence**, toward the attached garage, and out of view of the camera and, at or around 11:30 a.m., exit the **Lake Residence** through the front door and depart in their respective vehicles. As described below, based on the intercepted conversations and the events

observed on surveillance, I believe that the purpose of these meetings is to prepare and package heroin for distribution by the LAKE DTO's distributors.

81. Law enforcement officers have also observed a pattern of conduct between BARTON and LAKE. BARTON visits the **Lake Residence** approximately every three to four days for short periods of time. On numerous occasions throughout June, July, August, and September, including, most recently, September 9, 2018 (described below), agents intercepted text messages between BARTON and LAKE, in which BARTON arranged to visit LAKE and alerted LAKE to his arrival, which agents also observed through remote surveillance. Agents then observed BARTON enter the **Lake Residence**, exit shortly thereafter, and depart the area. On several occasions, BARTON was observed carrying a bag away from the **Lake Residence**. On July 7, 2018, described below, one day after BARTON was observed to visit the **Lake Residence**, law enforcement officers conducted a traffic stop of BARTON and recovered from his vehicle approximately 161.2 grams of heroin (with packaging), packaged for distribution in individual bags, grouped in bundles.

82. From on or about August 9, 2018, through on or about August 22, 2018, agents observed, through remote electronic surveillance, that LAKE, WILLIAMS and HUDSON continued to meet at the **Lake Residence**, but the meetings occurred in the afternoon. On or about August 22, 2018, LAKE temporarily ceased meetings with WILLIAMS and HUDSON. From on or about August 22, 2018, to on or about September 1, 2018, agents observed through remote surveillance that LAKE, WILLIAMS and HUDSON stopped meeting. On or about September 2, 2018, at

approximately 9:11a.m. and 10:44 a.m. respectively, agents observed WILLIAMS and HUDSON arrive at the **Lake Residence**, walk up the side of the residence and out of sight of the camera. Agents have observed LAKE, WILLIAMS and HUDSON meet at the **Lake Residence** in the morning on September 1-8, 11, 13, 18, 19, 20, 24 and 25, 2018.

b. Intercepted conversations regarding the LAKE DTO's preparation of narcotics at the Lake Residence.

83. On or about August 23, 2018, the same day agents observed HUDSON and WILLIAMS to begin meeting with LAKE in the afternoon, at approximately 2:33 p.m. (Session 1970), HUDSON, who was using Target Phone 3, had a conversation with Willie BLAKE, who was using telephone number 773-691-1428 ("Blake Phone 1").¹⁷ During the conversation, BLAKE alerted HUDSON that **158 North LaPorte** had run out of narcotics and asked if HUDSON and WILLIAMS had met to prepare them for distribution.

a. Hudson stated, "Must not be nothing crackin." HUDSON asked, "Why you say that?" and BLAKE responded, "Shit... We've [BLAKE and the other DTO members who sell narcotics at **158 North LaPorte**] been waiting [for a resupply of heroin] for over a couple hours. Two-three hours. Shit. Shit, what's the problem?"

¹⁷ Agents identified BLAKE as the user of phone number 773-691-1428 based on visitor records from the Bureau of Prisons, which stated that BLAKE uses this phone number to talk to his brother, who is incarcerated. Agents also spoke to BLAKE outside his residence of 5032 West Washington Street, Chicago, Illinois on September 20, 2018, compared BLAKE's voice to voice of the user of telephone number 773-691-1428, and recognized it to be BLAKE.

HUDSON stated, "For real?" BLAKE asked, "You ain't know?" HUDSON stated, "Hell no."

b. BLAKE stated, "Man, we've been waiting since this morning man. Six thirty. You know, I, shit, I'm thinking, I'm thinking y'all, I'm thinking ya'll at work or some shit. [BLAKE thought HUDSON and LAKE were busy preparing more heroin for distribution.] Oh, you aint?" HUDSON stated, "No."

84. Later the same day, following the phone call with BLAKE, beginning at approximately 3:29 p.m. (sessions 1977, 1981, 1982, 1985, 1987, 1989 and 1990), HUDSON, using Target Phone 3, exchanged the following electronic communications with LAKE, using Target Phone 5:

HUDSON: What's up play boy snoop [Willie BLAKE] call me and said they been [of narcotics] out sense this morning

LAKE: OK

LAKE: I'm on top of it

HUDSON: Ok is wee on for today [Are we meeting to prepare heroin for street sales]

LAKE: No

LAKE: Look for a place also [new place to prepare heroin for street sales]

85. Based on my training and experience, knowledge of the investigation, including previous and subsequent intercepted phone calls, I believe BLAKE alerted HUDSON that he and the other DTO members who sold narcotics from **158 North LaPorte** were out of heroin. HUDSON, in turn, alerted LAKE to that fact; LAKE

responded that he would supply the heroin to BLAKE (which, as described below, I believe LAKE did through BARTON), that they were not meeting that day, and that he would look for a new place to meet.

86. On or about August 24, 2018, at approximately 2:51 p.m. (Session 2051), WILLIAMS, who was using Target Phone 4,¹⁸ had a conversation with HUDSON, who was using Target Phone 3, during which HUDSON and WILLIAMS discussed LAKE's change in behavior.

a. During the conversation, WILLIAMS asked, "D [LAKE] ain't never get up with them boys?" [LAKE didn't supply heroin to **158 North LaPorte**, yet.] HUDSON asked, "Huh?" WILLIAMS responded, "I said they ain't ever get up with them? From yesterday?" HUDSON stated, "Yeah they been on, since yesterday." [Heroin was supplied the previous day; as described below, agents observed BARTON visit the **Lake Residence** on August 23, 2018.] WILLIAMS stated, "Oh okay. Right."

b. HUDSON stated, "I think-I think when he [LAKE] was [unintelligible] somewhere. His stomach was hurting, that motherf***er was nervous like a motherf***er." WILLIAMS asked, "He [LAKE] was nervous? You say, you say what my n***a? He [LAKE] was nervous?" HUDSON stated, "He [LAKE] had to been. Cause nobody was texting. [HUDSON was not receiving text messages asking

¹⁸ Through remote electronic surveillance, law enforcement officers have observed WILLIAMS drive a white van to LAKE's residence on repeated occasions. On June 6, 2018, agents placed a ruse call to Target Phone 4 and recognized the voice of the user to be male. At the same time they placed the ruse call, through remote surveillance, agents observed WILLIAMS sitting in the white van and holding a phone to his ear.

to be resupplied with heroin] And then now. And I asked him [LAKE] what he's on [how he was doing], and he said start looking for a place [a new location to begin preparing heroin for street sales.]” WILLIAMS responded, “Right. Ah okay, okay. Hell yeah, and shit that n***a [LAKE] nervous, huh whitey [“White Boy,” aka HUDSON]?” HUDSON stated, “Hell yeah.” WILLIAMS stated, “Right. So there's something going on we don’t know about.” HUDSON stated, “Right.”

87. On or about September 7, 2018, a week after LAKE, HUDSON and WILLIAMS resumed daily morning meetings at the **Lake Residence**, at approximately 11:41 a.m. (Session 2680), WILLIAMS, who was using 773-557-2260, had a conversation with HUDSON, who was using Target Phone 3, during which HUDSON and WILLIAMS discussed the salary LAKE paid them for packaging narcotics.

a. During the conversation, WILLIAMS asked, “Hey you know this- this 800 [dollars] you know that don't you?” HUDSON asked, “How much?” WILLIAMS replied, “Shit, 800 [dollars]. What he [LAKE] give you one stack or two?” HUDSON asked, “You said 800 [dollars]?” WILLIAMS responded, “Yeah, what he [LAKE] give you one stack or two stacks [of cash payment], one?” HUDSON stated, “Yep.” WILLIAMS asked, “I don't know, you know that last money he gave you the other day, that shit was 800 [dollars] too wasn't it?” HUDSON, replied, “Nuh uh.” WILLIAMS asked, “Oh that was a G?” [\$1,000] HUDSON stated, “You know what, to be honest I didn't even count that money, that money still sitting up.”

b. WILLIAMS stated, "Yeah, that motherf***er [LAKE], hey. That's 800 [dollars] certain, when you don't count it. I don't know what, man. I don't know what that fucks going on with this n***a [LAKE], man. I know we finna to get fucked [paid less] this month I'm just, I'm just short already." HUDSON stated, "He had the note book in his back pocket." WILLIAMS asked, "Huh?" HUDSON stated, "I said he got the notebook in his back pocket." WILLIAMS stated, "Oh he do?" HUDSON replied, "Yep." WILLIAMS stated, "Right." HUDSON stated, "He got both of them in there." WILLIAMS stated, "It ain't gonna do no good when you steady robbing mother fuckas, I'll be glad when this month go past though man. So we can get back to like he [LAKE] was doing it at first. You just feel like highway robbery right here boy." HUDSON responded, "Right."

c. WILLIAMS stated, "That shit gonna be thick though when you count it, and when you get a chance do your other one that shit gonna be the same thing, watch. I don't know what's going on with him. [Unintelligible] when you get where you're going." HUDSON replied, "Okay."

d. Based on my training and experience, my knowledge of the investigation, including the intercepted phone calls, and the above-described observations regarding the interruption in the LAKE DTO's operations during August 2018, I believe that LAKE paid HUDSON and WILLIAMS were paid \$800 by LAKE for the work they do packaging heroin for street sales; that this amount was less than usual to reflect the dates he did not call them in to work; and that HUDSON and WILLIAMS were complaining about it.

G. Wiretap Evidence of the LAKE DTO's Method of Distribution

88. As described below, once the LAKE DTO's heroin is cut, or prepared, and packaged for distribution to individual customers, HUDSON, WILLIAMS and BARTON are responsible for supplying lower level DTO members with distribution quantities of heroin and collecting proceeds on an ongoing basis. As set forth in detail below, street level distributors for the LAKE DTO contact HUDSON, WILLIAMS and BARTON, and occasionally contact LAKE directly, to order the heroin when they have sold their current supply. HUDSON, WILLIAMS and BARTON visit the street level distributors to supply narcotics collect proceeds from them, and communicate with LAKE to ensure that the DTO members are supplied in the correct order. HUDSON, WILLIAMS, and BARTON, travel to the **Lake Residence** to obtain additional distribution quantities of narcotics and to return narcotics proceeds to LAKE.

On or about May 11, 2018, LAKE discussed the purity of his heroin with Individual A.

89. On or about May 11, 2018, at approximately 10:28 p.m., Individual A, who was using telephone number XXX-XXX-8567, had a conversation with LAKE, who was using Target Phone 1. During the conversation, LAKE and Individual A discussed the potency of LAKE's heroin and the different methods LAKE and Individual A have used to prepare heroin for consumption.

a. During the conversation, LAKE asked, "I was trying to see how that [heroin provided by LAKE] was for you, man. If it was thumbs up or thumbs down [good or bad quality], man?" Individual A responded, "That's thumbs up [good

quality], I mean you know. I always go straight to the second flow you know that. [Individual A used two individual servings of heroin, one right after the other.] And now, just now I'm going to the- fucking with the third one so shit... That's good, you know what I'm saying [Individual A was enjoying the heroin so far, and was about to take a third serving].” LAKE responded, “Right.” Individual A then stated, “You hit me stronger before.” [LAKE has given Individual A stronger heroin on previous occasions.] Later, LAKE responded, “Yea, some you already had before. I just did it different.” [LAKE provided Individual A with heroin from the same batch but prepared it differently.] I did lesser- I did lesser. Sometimes lesser always gonna be key [LAKE added less diphenhydramine to the heroin].”

b. Later during the conversation, Individual A stated that he had been advised that, “if you do 25 of em [grams of heroin], right? You have to put them at 8 bottles [of diphenhydramine] on them. On the 25.” LAKE replied, “Right.” Individual A stated, “They didn't do it because, he didn't want to get that many fuck his shit up, kill the shit.” [An unknown individual believed that 8 bottles of diphenhydramine on 25 grams of heroin would ruin it.] LAKE asked, “Right... How long ago was it?” Individual A replied, “This was, I mean, I tell you, when I first came home man. Long, you know, back back shit... 2001, man.” LAKE stated, “Ok, yea right. Like 30 bottles [of diphenhydramine], 30 bottles on the hundred [100 grams of heroin] that's right. He was right.”

c. Individual A stated, “Yeah, he said, man mother fucker told him that, man and uh... he said, man you ain't gonna believe this shit, man I, God damn

it... he's like dude had told him to put I think he said 8 [bottles of diphenhydramine] or some shit, 7 or 8, on 25 [grams of heroin]. He had went with, God damn it, just 5 [bottles of diphenhydramine] and the mother fucker didn't like it. He said it wasn't shit. He like naw dog, I told you what to do. He said man, that fucks all the shit down and add 3 more [bottles of diphenhydramine] to it. And then put it out there, watch what they say. He said he did that, man and them people ate that shit up. I'm like get the fuck outta here he said man I ain't bullshitting. He said some shit you got to do like that to wake it up.” [After using 8 bottles of diphenhydramine on 25 grams of heroin instead of only 5 bottles, the heroin sold better on the streets.] LAKE stated, “I like, but damn that shit higher back then.” [The heroin was stronger in 2001] Individual A replied, “Yeah, it was... yeah it was much higher. But it was higher but it was the same- like it was stronger.” LAKE stated, “Right, it was.”

90. Based on my training and experience, my knowledge of the investigation, and the context of the conversation, I believe LAKE and Individual A were discussing the most profitable ratio of diphenhydramine to heroin, when cutting pure heroin in preparation for street sales.

On or about May 15, 2018, HUGHES ordered heroin from LAKE and HUDSON supplied the heroin to HUGHES and VIVETTER.

91. As described below, on May 15, 2018, HUGHES contacted LAKE to order more heroin. At the time, HUDSON and WILLIAMS were at the **Lake Residence** with LAKE. LAKE directed HUDSON to meet HUGHES to distribute heroin to HUGHES. Agents maintained surveillance of HUDSON and observed

HUDSON engage in a hand to hand transaction with HUGHES, who was accompanied by VIVETTER.

92. On or about May 15, 2018, at approximately 11:12 a.m. (Sessions 876-887), LAKE, who was using Target Phone 1, exchanged the following electronic communications with DEANDRE HUGHES, who was using telephone number 312-792-7387 (“Hughes Phone 2”)¹⁹:

LAKE: What up playboy

HUGHES: What up unc

LAKE: Where you at

HUGHES: I’m at steak and egger on central and Roosevelt unc

LAKE: That’s what up

LAKE: When will you be done

HUGHES: Like 10 min

LAKE: Ok

LAKE: Stay there

HUGHES: Ok

LAKE: Ok

¹⁹ Investigators believe that HUGHES uses Hughes Phone 2 based upon the following: LAKE referred to HUGHES as “Dee Dee,” HUGHES’ known nickname, in session 1065. In addition, HUGHES told LAKE when his birthday was (July 19) in session 1633, which corresponds with HUGHES’ known birthday according to CPD records. Finally, officers identified HUGHES as the individual who arrived to obtain narcotics from HUDSON, at the time and place LAKE discussed with the user of Hughes Phone 2.

93. About ten minutes later, at approximately 11:21 a.m., surveillance agents observed HUDSON exit the **Lake Residence**, carrying a white plastic bag. HUDSON entered his vehicle, a 2004 white Pontiac Grand Prix, and drove away from the location.

94. According to toll records for Target Phone 3, at approximately 11:36 a.m., HUDSON, using Target Phone 3, called and then sent a text message to LAKE, who was using Target Phone 2.²⁰ At approximately 11:37 a.m., Target Phone 2 sent a text message to HUDSON.

95. At the same time, surveillance agents observed HUDSON park his vehicle at a Steak and Egger restaurant located at 5601 West Roosevelt Road, Chicago, Illinois.

96. On or about May 15, 2018, at approximately 11:37 a.m., LAKE, who was using Target Phone 1, exchanged the following electronic communications with HUGHES, who was using Hughes Phone 2 (Session 890-892).

LAKE: Come out

HUGHES: Ok

LAKE: Ok

²⁰ Agents identified LAKE as the user of Target Phone 2 in part through the events described above. Namely, that, minutes after LAKE arranged to distribute narcotics to HUGHES, and moments before agents observed HUDSON to meet with HUGHES and conduct the transaction which HUGHES had only discussed with LAKE, Target Phone 2 texted HUDSON. Further, since then, agents have compared the voice of the user of Target Phone 1 and Target Phone 2 and determined that they are both LAKE.

97. At approximately 11:37 a.m., agents observed an unknown black male, later identified as HUGHES,²¹ walk out of the Steak and Egger restaurant and enter the front passenger seat of HUDSON's vehicle.

98. At approximately 11:38 a.m., agents observed HUGHES exit the front passenger seat of HUDSON's vehicle, and enter the front passenger seat of a 2013 red Chevrolet Impala. Law enforcement surveillance officers had previously viewed booking photos of CLAYVON VIVETTER and identified him as the driver of the red Impala. Agents observed HUDSON and VIVETTER depart in their respective vehicles.

99. On the same day, one minute later, at approximately 11:39 a.m., LAKE, who was using Target Phone 1, exchanged the following electronic communications with HUGHES, who was using Hughes Phone 2 (Session 893-894).

HUGHES: Appreciate it

LAKE: You welcome

100. At approximately 12:06 p.m., the 2013 red Chevrolet Impala (driven by VIVETTER, with HUGHES as the passenger) came to a stop at approximately 4800 West Monroe Street, Chicago, Illinois. An unknown black male briefly approached the front passenger's side window of the vehicle and then quickly walked away.

101. Based on my training and experience and my knowledge of the investigation, including the intercepted calls, toll information and surveillance

²¹ Law enforcement officers identified HUGHES through photographs of HUGHES from law enforcement databases.

described above, I believe that (1) LAKE, with the assistance of HUDSON, used Target Phone 1 to facilitate a narcotics transaction with HUGHES in the parking lot of the Steak and Egger restaurant; (2) LAKE used Target Phone 1 to communicate with HUGHES and Target Phone 2 to communicate with HUDSON; (3) HUDSON delivered LAKE's narcotics to HUGHES at LAKE's direction; and (4) HUGHES distributed some or all of the narcotics he obtained from HUDSON to an unknown individual at approximately 4800 West Monroe Street.

On or about June 2 and 4, 2018, BLAKE and LAKE discussed BLAKE's late payment of narcotics proceeds to LAKE.

102. On or about June 2, 2018, at approximately 6:39 p.m., LAKE, who was using Target Phone 1, exchanged the following electronic communications with Willie BLAKE, who was using Blake Phone 1 (Sessions: 2680, 2682-2692, 2694).

LAKE: What up playboy

BLAKE: What up my n***a

LAKE: Im trying to see

BLAKE: My n***a soon as Mr young [Eddie YOUNG] check clear I got you he said Monday

LAKE: Its not about that and you know it

BLAKE: Your boy [Derron BARTON] make if so imma get fired my n***a [not allowed to sell heroin for the LAKE DTO] I need my job

LAKE: Ask me first

LAKE: Thanks

LAKE: Not that you aint good for it, because you is after what we been through the good the bad the ugly, i just do business a certain way, communication is key to avoid misunderstanding

BLAKE: I know my n***a

LAKE: Ok

103. Based on my training and experience, knowledge of the investigation and intercepted conversations, I believe BLAKE spent the proceeds made from selling narcotics for LAKE, instead of turning them over to BARTON. LAKE directed BLAKE not to do that again without asking LAKE.

104. On or about June 4, 2018, at approximately 3:15 p.m., LAKE, who was using Target Phone 1, exchanged the following electronic communications with Willie BLAKE, who was using Blake Phone 1 (Sessions: 2833-2844, 2847-2850, 2852, 2853).

BLAKE: My n***a my old man [YOUNG] said tomorrow the check Will be clear tomorrow I got 6000 [dollars] coming I got you

LAKE: Ok

BLAKE: Tell your boy [BARTON] don't skip me its in the bank put up don't even worry my dude

LAKE: Ok

LAKE: But it aint about the money, its about the communication to avoid a misunderstanding

BLAKE: I would of told you but your number was in my old phone

BLAKE: I'll rather told you than debo [Derron BARTON]

LAKE: Ask me first to see if its ok or not, before you take things into your own hands

BLAKE: OK I wouldn't did it if wasn't important especially 500 I needed to buy my daughter a prom dress and its been fucked up and stressful on me for the past 2 months

LAKE: I know

BLAKE: Its to the point I don't even fuck with my sisters my n***a

LAKE: But 4 the record don't [sic] it again without asking first

BLAKE: OK

BLAKE: OK

BLAKE: OK

LAKE: Thanks

105. Based on my training and experience, knowledge of the investigation and intercepted conversations, I believe that: (1) BLAKE spent narcotics proceeds instead of turning them over to BARTON; (2) BARTON indicated to BLAKE that he would not be allowed to sell more of the LAKE DTO's narcotics until he repaid the proceeds; (3) BLAKE told LAKE that he had \$6,000 to pay to LAKE; (4) BLAKE asked LAKE, as a result, to direct BARTON not to skip BLAKE in the rotation between the LAKE DTO's distributors; and (5) LAKE reiterated that BLAKE should not spend the LAKE DTO's proceeds again without asking LAKE, first.

On or about June 14, 2018, LAKE coordinated supply of narcotics to YOUNG.

106. On or about June 14, 2018, at approximately 1:33 p.m. (Session 3304), Eddie YOUNG who was using phone number 773-565-5400 (“Young Phone 1”),²² had a conversation with LAKE, who was using Target Phone 1, during which YOUNG asked LAKE when LAKE would provide him with heroin. Specifically, LAKE said, “What’s going on with you?” YOUNG replied, “Ain’t shit, I’m waiting on you [to provide narcotics], shit.” LAKE stated, “We gonna, we gonna, we gonna knock it out the way tomorrow.” YOUNG asked, “You sure?” LAKE answered, “Yeah, I’m positive.” YOUNG stated, “Okay.” LAKE stated, “It might be today, I’m finna call them [HUDSON and WILLIAMS] now then I’m gonna call you right back.” YOUNG replied, “Alright, call me back.”

107. Toll information for Target Phone 3, used by HUDSON, and Target Phone 4, used by WILLIAMS, showed that YOUNG was in contact with HUDSON on June 14, 2018, June 15, 2018, and June 16, 2018, and with WILLIAMS on June 14, 2018.

108. Based on my training and experience and knowledge of the investigation, including the intercepted conversations and the toll information described above, I believe (1) YOUNG asked LAKE when LAKE would provide heroin to him; (2) LAKE advised YOUNG that a delivery of heroin would occur on the day of the call or the following day; (3) LAKE directed HUDSON and WILLIAMS to supply YOUNG with narcotics; and (4) they contacted YOUNG to coordinate the transaction.

²² Agents spoke to YOUNG outside his residence of 4821 West Quincy Street, Chicago, Illinois on August 9, 2018. Agents compared YOUNG’s voice to voice of the user of telephone number 773-565-5400, and recognized it to be YOUNG.

On June 26, 2018, LAKE distributed heroin to Derron BARTON at the Lake Residence.

109. On or about June 26, 2018, at approximately 11:10 p.m. (Session 313-319), LAKE, who was using Target Phone 2, exchanged the following electronic communications with DERRON BARTON²³, who was using 312-848-8260 (“Barton Phone 1”):

BARTON: What up cuz

LAKE: What up

BARTON: Need to c u

LAKE: Ok

LAKE: Im here

BARTON: Ok

LAKE: Ok

110. On or about June 26, 2018, at approximately 11:56 p.m. (Session 320-321), LAKE, who was using Target Phone 2, exchanged the following electronic communications with DERRON BARTON, who was using Barton Phone 1.

BARTON: Im here

LAKE: Ok

111. At approximately the same time, agents, who were conducting surveillance via pole camera, observed BARTON’s Honda Accord park on the street

²³ Agents identified BARTON as the user of Barton Phone 1 based on the fact that agents recognized BARTON as the individual who arrived at the **Lake Residence** on June 26, 2018, at the same time the user of Barton Phone 1 stated, “Im here,” as well as on several similar occasions, some of which are also described in this Affidavit.

across from the **Lake Residence**. Agents, who had previously viewed known photographs of BARTON and who had become familiar with his appearance through surveillance, observed BARTON exit the vehicle and walked into the front door of the **Lake Residence**.

112. On or about June 27, 2018, at approximately 12:04 a.m., LAKE and BARTON walked out of the front door of the **Lake Residence**. BARTON got in his vehicle and drove away and LAKE walked back inside the **Lake Residence**.

113. Based on my training and experience, my knowledge of the investigation, and the intercepted conversations, I believe BARTON went to the **Lake Residence** to obtain a resupply of heroin from LAKE.

On or about August 3, 2018, HUDSON, LAKE, HUGHES, MOORE and RATLIFF discussed the order in which they were supplied with heroin.

114. On or about August 3, 2018, at approximately 6:55 p.m. (199, 200), Steven MOORE, who was using phone number 312-989-4643 ("Moore Phone 1"),²⁴ exchanged the following electronic communications with HUDSON, who was using Target Phone 3:

MOORE: 9 put up [MOORE had 9 servings of heroin left for sale]

HUDSON: Ok

115. On or about August 3, 2018, at approximately 6:57 p.m. (202-211, 213, 215) Romell RATLIFF, who was using phone number 773-724-8109 ("Ratliff Phone

²⁴ Agents identified MOORE as the user of 312-989-4643 based on the following: MOORE provided the phone number to Chicago Police Officers in June 2018. Further, during session 404 on Target Phone 1, MOORE told LAKE his birthday, June 6, which is MOORE's birthday, according to law enforcement databases.

1”)²⁵, exchanged the following electronic communications with HUDSON, who was using Target Phone 3:

HUDSON: Who after man [Who is resupplied with heroin after Steven MOORE]

RATLIFF: Dd [Deandre HUGHES]

HUDSON: You don't old [hold] nothing [HUDSON is asking if RATLIFF has heroin for sale on his person]

RATLIFF: Yeah

HUDSON: Who was on [selling heroin at **158 North LaPorte**] before man [Steven MOORE]

RATLIFF: Me

HUDSON: You ready for me

RATLIFF: It's Dd [Deandre HUGHES] next then snoop [Willie BLAKE] then me then man [Steven MOORE]

RATLIFF: Yeah

HUDSON: Ok on my way now

RATLIFF: Let me finish this and I'm bout to walk home [RATLIFF is waiting to sell the last of his heroin]

HUDSON: Ok

²⁵ Agents identified RATLIFF as the user of 773-724-8109 based on the following: RATLIFF listed the phone number on an Illinois Secretary of State Vehicle registration form when he purchased his 2007 Infiniti SUV on April 16, 2017. In addition, law enforcement officers who had previously viewed a known photograph of RATLIFF recognized RATLIFF as the individual who met with HUDSON following the conversations described below.

116. Based on my training and experience, knowledge of the investigation and intercepted phone calls, I believe RATLIFF, MOORE, HUGHES, and BLAKE rotate who conducts heroin sales at **158 North LaPorte**. HUDSON and RATLIFF were discussing who was next in the rotation to receive heroin and sell it at **158 North LaPorte**.

117. On or about August 3, 2018, at approximately 7:00 p.m. (Session 208) Deandre HUGHES²⁶, who was using phone number 312-989-8015 (“Hughes Phone 2”), had a conversation with HUDSON, who was using Target Phone 3, about being provided narcotics. HUGHES asked, “Uh... can you come by uh... Neck [Romell RATLIFF’s] crib [house].” HUDSON replied, “Huh?” HUGHES stated, “I said, can you come by Neck [Romell RATLIFF’s] crib [house].” HUDSON stated, “Okay. Ima call you when I’m ready for you.” Based on my training and experience, knowledge of the investigation and intercepted phone calls, I believe HUGHES asked HUDSON to meet him at RATLIFF’s house to distribute heroin to him.

118. On or about August 3, 2018, at approximately 7:01 p.m. (Sessions 212, 214, 216, 218, 220, 222, 224, 226, 228, 230) HUDSON, who was using Target Phone 3, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

²⁶ Agents identified HUGHES as the user of 312-989-8015 based upon the following: a phone number was listed in Facebook subscriber records for “Deandre Hughes” Facebook profile. Additionally, on September 13, 2018, at approximately 5:46 p.m., law enforcement was monitoring a CPD pole camera at 158 North LaPorte Avenue, at that time HUDSON called HUGHES (session 3033). HUGHES was observed talking on the phone for the duration of the intercepted call.

HUDSON: I need to see you [pick up heroin]

LAKE: Ok

LAKE: For who

HUDSON: De De [Deandre HUGHES]

HUDSON: Man [Steven MOORE] got 9 [servings of heroin] left [for sale]

LAKE: Snoop before him [Willie BLAKE should get resupplied with heroin before HUGHES]

LAKE: But Ok

HUDSON: Yeah

LAKE: Hit you when I get out of [barber] shop

HUDSON: Naw Snoop after him [BLAKE gets resupplied with heroin after HUGHES]

HUDSON: OK

119. On or about August 3, 2018, at approximately 8:41 p.m. (Sessions 234, 238, 239) Deandre HUGHES, who was using Hughes Phone 2, exchanged the following electronic communications with HUDSON, who was using Target Phone 3:

HUGHES: I'm finna go on the block church or you on your way

HUDSON: I'm waiting on your uncle [HUDSON is waiting to obtain heroin from LAKE.]

HUGHES: Ok

120. On or about August 3, 2018, at approximately 8:43 p.m. (Sessions 236, 238, 240, 242, 244, 246, 248, 250) HUDSON, who was using Target Phone 3,

exchanged the following electronic communications with LAKE, who was using Target Phone 5:

HUDSON: What up play boy

LAKE: What up

HUDSON: I need to see you [pick up heroin]

LAKE: Same person [HUGHES]

HUDSON: Yeah

LAKE: Ok

LAKE: Come on

HUDSON: On my way now

121. On or about August 3, 2018, at approximately 9:19 p.m. (Session 249) Deandre HUGHES, who was using Hughes Phone 2, had a conversation with HUDSON, who was using Target Phone 3, about being provided narcotics. During the conversation, HUGHES stated, “Alright. I’m right here on the block [**158 North LaPorte**].” HUDSON replied, “I’m a call you when I get close... so you can go on over there.”

122. On or about August 3, 2018, at approximately 9:36 p.m. (Sessions 252, 260, 262) HUDSON, who was using Target Phone 3, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

HUDSON: I’m here

LAKE: Ok

LAKE: Ok

123. At approximately the same time, agents, who were conducting surveillance via pole camera, observed HUDSON's Grand Prix park on the street in front of the **Lake Residence**.

124. At approximately 9:54 p.m. LAKE, driving a silver Jeep Patriot, parked in the driveway of the **Lake Residence**. According to Secretary of State databases, the Patriot was registered to LAKE's mother. About two minutes later, at approximately 9:56 p.m., HUDSON exited the vehicle and walked into the front door of the **Lake Residence**. At approximately 10:00 p.m., HUDSON walked out of the front door of the **Lake Residence**, entered his Pontiac Grand Prix, and drove away.

125. On or about August 3, 2018, at approximately 10:03 p.m. (Session 253) Deandre HUGHES, who was using Hughes Phone 2, had a conversation with HUDSON, who was using Target Phone 3, about being provided narcotics. HUGHES answered, "Yo?" HUDSON stated, "I'm on my way, Church." HUGHES stated, "Alright." Based on my training and experience, knowledge of the investigation and intercepted phone calls, I believe HUDSON was telling HUGHES he was on his way to meet him to distribute heroin to him at **158 North LaPorte**.

126. On or about August 3, 2018, at approximately 10:16 p.m. (Session 256) Deandre HUGHES, who was using Hughes Phone 2, had a conversation with HUDSON, who was using Target Phone 3, about being provided narcotics. HUGHES answered, "Yo?" HUDSON stated, "Yo." HUGHES stated, "Yo." HUDSON stated, "Pulling up in five minutes, Church." HUGHES stated, "Alright. I'm here."

127. Based on my training and experience, my knowledge of the investigation, and the intercepted conversations, I believe HUDSON went to the **Lake Residence** to obtain a resupply of heroin from LAKE, for subsequent distribution by HUGHES at **158 North LaPorte**, and then distributed heroin to HUGHES for subsequent redistribution by HUGHES at **158 North LaPorte**.

On or about August 4, 2018, HUDSON distributed heroin to LAWRENCE JONES.

128. On or about August 4, 2018, at approximately 10:48 a.m. (Session 297), Lawrence JONES (AKA “Fish”), who was using 773-251-4386 (“Jones Phone 1”),²⁷ had a conversation with LAKE, who was using Target Phone 5. During the conversation, JONES asked LAKE where HUDSON was. HUDSON was supposed to provide JONES with heroin. LAKE answered, “Hello?” JONES replied, “Big dog, big dog, hello?” LAKE asked, “Who is this?” JONES replied, “This Fish.” LAKE asked, “Who?” JONES responded, “This Fish.” LAKE stated, “Oh what up, what up, big dog?” JONES asked, “Hey, hey [Unintelligible], look, I’ve been calling WB [White Boy/HUDSON] all morning man. Uh, where, where this n***a at, man?” LAKE stated, “Huh” JONES replied, “I said I’ve been calling, I’ve been calling WB [“White Boy,” aka HUDSON] all morning, man. He ain’t getting up with me, man.” LAKE

²⁷ Agents identified JONES as the user of telephone number 773-251-4386 based on the following: Agents who had previously viewed a known photograph of JONES recognized him as the individual who met with HUDSON, at the time and location described by HUDSON in the intercepted calls described on August 4, 2018 to conduct the narcotics transaction described below.

asked, “Ah, for what?”[what type of narcotic] JONES replied, “Uh, your lil boy [heroin], man.” LAKE stated, “Okay, okay. Alright.” JONES stated, “Alright.”

129. On or about August 4, 2018, at approximately 11:55 a.m. (Session 304), LAWRENCE JONES (aka “Fish”), who was using Jones Phone 1, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES asked HUDSON to provide him with heroin. HUDSON asked, “What you need me on?” JONES replied, “Lil Boy [heroin].” HUDSON asked, “Huh?” JONES replied, “Lil boy [heroin].” HUDSON stated, “Boy [heroin]?” and JONES responded, “Yup.” HUDSON stated, “Okay” JONES stated, “Alright.” HUDSON stated, “Give me ‘bout 20 minutes, Church [slang for “buddy”].” JONES replied, “Okay.”

130. On or about August 4, 2018, at approximately 1:24 p.m. (Session 326), JONES, who was using Jones Phone 1, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, HUDSON told JONES where to meet him. JONES answered the phone, “Yeah.” HUDSON stated, “On the porch, Church.” JONES responded, “Alright.” HUDSON stated, “Hey. In front of my old house. [HUDSON previously lived at 214 North LaPorte, Chicago, Illinois.] JONES asked, “Huh?” HUDSON stated, “I’m in front of my old house.” JONES asked, “Okay. On the porch.” HUDSON stated, “Yeah.”

131. On or about August 4, 2018, at approximately 1:25 p.m., utilizing video surveillance of 200 North LaPorte, Chicago, Illinois, agents observed HUDSON’s white Pontiac Grand Prix parked on the street in front of approximately 214 North LaPorte, Chicago, Illinois. HUDSON stood outside the vehicle and opened the hood

of the vehicle. JONES²⁸, who was riding a bicycle, approached HUDSON. JONES briefly spoke to HUDSON outside of the vehicle and then JONES sat in the driver's seat in the vehicle. JONES exited the vehicle, got back on the bicycle and rode away. Based on my training and experience, knowledge of the investigation, and intercepted phone calls, I believe HUDSON and JONES engaged in a narcotics transaction.

On or about August 4, 2018, HUDSON discussed narcotics distribution with Willie BLAKE.

132. On or about August 4, 2018, at approximately 12:09 p.m. (Session 309), HUDSON, who was using Target Phone 3, had a conversation with Willie BLAKE, who was using Blake Phone 1. During the conversation, BLAKE asked, "What's the word, bird? You trying to run into a playa?" [Collect proceeds and provide heroin for street sales] HUDSON asked, "Finna bring your shit [money]?" and BLAKE responded, "You gonna meet me out on [4800 West] Quincy [Street]?" HUDSON stated, "You want it [heroin] now? Or what?" BLAKE stated, "Yeah, yeah. Hell yeah." HUDSON stated, "Alright." BLAKE stated, "I'm finna walk over there now?" HUDSON asked, "Where?" BLAKE stated, "I'm on the block. I'm finna walk on the Q [4800 West Quincy Street] now." HUDSON asked, "On the Q [4800 West Quincy Street]? Okay.] BLAKE stated, "Yeah."

133. Later the same day, following the phone call with BLAKE, at approximately 1:33 p.m. (session 327), HUDSON, using Target Phone 3, sent a text message to BLAKE, using Blake Phone 1, which stated, "What happened".

²⁸ Agents recognized JONES from a CPD booking photograph.

134. On or about August 4, 2018, at approximately 3:14 p.m. (Session 342), HUDSON, who was using Target Phone 3, had a conversation with Willie BLAKE, who was using Blake Phone 1. During the conversation, BLAKE asked, “You must have, you must have changed Mann [Steven MOORE] up.” [HUDSON provided heroin to MOORE instead of BLAKE] HUDSON stated, “Naw your uncle [LAKE] told me to hold on.” [LAKE told HUDSON to wait to distribute heroin to BLAKE]. BLAKE responded, “Okay.”

135. On or about August 4, 2018, at approximately 7:19 p.m. (Session 278, 280, 282, 284, 286, 288, 290, 292, 295, 299), LAKE, who was using Target Phone 5, exchanged the following electronic communications with DERRON BARTON, who was using 773-280-2915 (“Barton Phone 2”)²⁹:

BARTON: What up cuz

LAKE: What up playboy

BARTON: Chillin bout go get something 2 eat

LAKE: Aw OK

LAKE: Who was after Mann [Who is next to be resupplied with heroin after Steven MOORE]

BARTON: Snoop [Willie BLAKE]

LAKE: You sure

²⁹ Agents identified BARTON as the user of 773-280-2915 based on the events they observed on surveillance, in combination with the intercepted conversations, described in this Affidavit. In addition, agents recognized BARTON’s voice both from the July 7, 2018 arrest and from previous intercepted conversations.

BARTON: It suppose 2 b dd [Deandre HUGHES] he went [was resupplied] already so it on snoop [Willie BLAKE]

LAKE: Ok

On or about August 8, 2018, HUDSON distributed heroin to RATLIFF.

136. On or about August 8, 2018, at approximately 2:33 p.m. (Sessions 698, 703, 705, 707-710, 711, 713, 715, 717-719), HUDSON, who was using Target Phone 3, exchanged the following electronic communications with RATLIFF, who was using Ratliff Phone 1:

RATLIFF: Yoo..you ready [to deliver heroin] yet jack

HUDSON: Give me 30 minutes

RATLIFF: Need to see you

HUDSON: How snoop looking [how much heroin does Willie BLAKE have left]

RATLIFF: His last [serving of heroin] out there

HUDSON: Out Ok

RATLIFF: Yep

HUDSON: Ok I'm on my way

RATLIFF: Ok I'm riding around

HUDSON: Ok

HUDSON: Wya [Where you at?]

RATLIFF: Riding down Madison

HUDSON: Ok

HUDSON: 15 minutes

137. On or about August 8, 2018, at approximately 4:08 p.m., HUDSON's white Pontiac Grand Prix was observed on CPD surveillance cameras parked on the street in front of approximately 214 North LaPorte, Chicago, Illinois, behind RATLIFF's 2007 gray Infiniti SUV. RATLIFF³⁰ exited his vehicle, opened the front passenger door of HUDSON's vehicle, reached inside the vehicle, and retrieved an object. RATLIFF then reached down his pants in a stuffing motion. RATLIFF got back into his vehicle and drove away from HUDSON and through the alley behind 100 North LaPorte. RATLIFF stopped the vehicle in the alley behind **158 North LaPorte** and threw an object that appeared to be, based upon my training and experience, a package of heroin, at the wrought iron gate next to **158 North LaPorte's** detached garage. The package of heroin bounced off the gate and landed on the ground. Steven MOORE reached underneath the gate and retrieved the heroin. Based on my training and experience, knowledge of the investigation, and intercepted phone calls, I believe HUDSON supplied RATLIFF with heroin and RATLIFF gave the heroin to MOORE.

On or about August 9, 2018, HUDSON collected narcotics proceeds from BLAKE.

138. On or about August 9, 2018, at approximately 8:56 a.m. (Session 760), HUDSON, who was using Target Phone 3, had a conversation with BLAKE, who was using Blake Phone 1. During the conversation, BLAKE asked, "Hey. Who I give the

³⁰ Law enforcement officers identified RATLIFF as the individual exiting the vehicle based on their prior review of a known photograph of RATLIFF.

bread [money] to? You?” [Does BLAKE turn his proceeds over to HUDSON] HUDSON stated, “Yeah.” BLAKE responded, “Okay. Give me a minute, White. I’m finna get all, finna get it all together. Them I’m finna roll back on the Quincy. I’m gonna call your phone” HUDSON stated, “Alright.”

139. On or about August 9, 2018, at approximately 11:46 a.m. (Session 769), HUDSON, who was using Target Phone 3, had a conversation with Willie BLAKE, who was using Blake Phone 1. During the conversation, BLAKE asked, “Can you hear me? Whenever you get ready, slide. You heard me?” [BLAKE was ready turn his proceeds over to HUDSON] HUDSON stated, “You ready.” BLAKE responded, “Yeah, yeah, come on down to Quincy.” HUDSON stated, “I’m on my way.”

140. On or about August 9, 2018, at approximately 11:56 a.m. (Session 769), HUDSON, who was using Target Phone 3, had a conversation with Willie BLAKE, who was using Blake Phone 1. During the conversation, BLAKE asked, “Is you on the front?” HUDSON stated, “I finna be pulling up. Hey, hey, Eddie [YOUNG] got some weed?” BLAKE responded, “Yup. He should have some.” HUDSON stated, “Where he got it?” BLAKE responded, “I don’t know. He might be, he might of would a went up to the gym. Let me look in his room then I’m, I’m finna see if he in his room.” HUDSON stated, “Aight.”

141. On or about August 9, 2018, at approximately 12:01 p.m. (Session 773), HUDSON, who was using Target Phone 3, had a conversation with Willie BLAKE, who was using Blake Phone 1. During the conversation, BLAKE asked, “You pulling

up now?" HUDSON stated, "I finna to. I had to roll around all that construction right there." BLAKE responded, "Oh, alright, it sure, it sure is. Aight."

142. Based on my training and experience, knowledge of the investigation and intercepted phone calls, I believe HUDSON collected narcotics proceeds from BLAKE.

On or about August 9, 2018, HUDSON and BARTON distributed narcotics to JONES.

143. On or about August 9, 2018, at approximately 3:03 p.m. (Session 784), LAWRENCE JONES (aka "Fish"), who was using Jones Phone 1, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES asked HUDSON to provide him with narcotics. JONES stated, "Come slide on me, Lord." [JONES needs HUDSON to provide him narcotics] HUDSON stated, "Nothing. Chilling." JONES stated, "I said come slide on me. You heard me?" HUDSON stated, "Yeah. Oh, damn. You need me?" JONES stated, "Yeah. You dressed? [Does HUDSON have narcotics with him]" HUDSON stated, "I gotta get it. I gotta go get it." [HUDSON needs to pick the narcotics up from LAKE's house] JONES stated, "Aight, cuz. Everything [heroin and crack cocaine]." HUDSON stated, "For everything [heroin and crack cocaine]?" JONES stated, "Yeah." HUDSON stated, "Okay."

144. On the same day, at approximately 3:23 p.m. (Sessions 785-788), DARNELL HUDSON, who was using Target Phone 3, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

HUDSON: I need to see you [pick up narcotics] for

HUDSON: Fish

LAKE: For what [what type of narcotic]

HUDSON: For both [heroin and crack cocaine]

145. Later the same day, at approximately 5:19 p.m. (Sessions 797, 798), DARNELL HUDSON, who was using Target Phone 3, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

HUDSON: I'm here

LAKE: OK

146. At approximately the same time, agents, who were conducting surveillance via pole camera, observed HUDSON's white Pontiac Grand Prix park on the street across from of the **Lake Residence**. HUDSON exited the vehicle and walked up the driveway to the rear of the **Lake Residence**.

147. At approximately 5:36 p.m., agents, who were conducting surveillance via pole camera, observed LAKE walk north on Geneva Avenue, and in the front door of the **Lake Residence**. On or about August 9, 2018, at approximately 5:41 p.m., DARNELL HUDSON, who was using Target Phone 3, exchanged the following electronic communications with LAKE, who was using Target Phone 5 (Sessions 800, 801):

LAKE: I'm here

HUDSON: I'm at back door

148. On or about August 9, 2018, at approximately 5:46 p.m. (Sessions 802-810), DARNELL HUDSON, who was using Target Phone 3, exchanged the following electronic communications with JONES, who was using Jones Phone 1:

HUDSON: Did you hit on the boy? [Did JONES get more heroin from BARTON]

JONES: naw I,m dry on everything [JONES is out of heroin and crack cocaine]

HUDSON: Did Debo [BARTON] hit you [call]

HUDSON: Call debo

JONES: O.k, I GOT IT RIGHT! MISUNDERSTANDING [JONES is supposed to call BARTON when he needs more heroin]

HUDSON: But I'm bring you that bitch and get the ress of that money [HUDSON is going to bring JONES crack cocaine and collect money from JONES]

HUDSON: Don't give him [BARTON] that money

JONES: AIGHT. I KNOW,THAT,S YOURS!

JONES: YEP,

149. At approximately 5:53 p.m., agents, who were conducting surveillance via pole camera, observed HUDSON exit the front door of the **Lake Residence**, get in his white Pontiac Grand Prix park and drive away. At approximately 6:27 p.m., agents, who were conducting physical surveillance, observed HUDSON's white Pontiac Grand Prix park in front of 5017 West Maypole Avenue. JONES exited the

basement apartment of 5017 West Maypole Avenue, and approached HUDSON's vehicle. HUDSON and JONES briefly conversed, after which JONES ran back into the basement apartment 5017 West Maypole Avenue. Shortly after entering, JONES exited the basement apartment of 5017 West Maypole Avenue, and got into the front passenger's seat of HUDSON's vehicle. JONES then exited HUDSON's vehicle and went back to his basement residence at 5017 West Maypole Avenue. HUDSON drove away from the location.

150. At approximately 6:00 p.m., agents, who were conducting physical surveillance observed JONES enter BARTON's black Honda Accord, at approximately 233 North Laverne Avenue. The vehicle dove away. Approximately five minutes later, at approximately 6:05 p.m., JONES was observed exiting BARTON's vehicle at the intersection of West West End Avenue and North LaPorte. JONES ran to 175 North Laverne Avenue, got on a bicycle and rode to 5017 West Maypole Avenue. Upon arriving at 5017 West Maypole Avenue, JONES got off of the bicycle and went inside.

151. At approximately 6:15 p.m., agents, who were conducting physical surveillance, observed JONES exit 5017 West Maypole Avenue, and approach a maroon Hyundai sedan that was parked in front of the residence. JONES engaged in a hand to hand transaction with the driver. Following the transaction JONES reentered 5017 West Maypole Avenue.

152. At approximately 6:27 p.m., agents, who were conducting physical surveillance, observed HUDSON's white Pontiac Grand Prix park in front of 5017

West Maypole Avenue. JONES exited the basement apartment of 5017 West Maypole Avenue, and approached HUDSON's vehicle. HUDSON and JONES briefly conversed, after which JONES ran back into the basement apartment 5017 West Maypole Avenue. Shortly after entering, JONES exited the basement apartment of 5017 West Maypole Avenue, and got into the front passenger's seat of HUDSON's vehicle. JONES then exited HUDSON's vehicle and went back to his basement residence at 5017 West Maypole Avenue. HUDSON drove away from the location.

153. Based on my training and experience, and my knowledge of the investigation, including previous and subsequent intercepted conversations and the surveillance described above, I believe JONES contacted HUDSON to be supplied with heroin and crack cocaine. HUDSON advised JONES to contact BARTON to be supplied with heroin. HUDSON then went to LAKE's and obtained crack cocaine for JONES. BARTON supplied JONES with heroin; JONES engaged in a narcotics transaction with the unknown occupant of the Maroon Hyundai; and HUDSON supplied JONES with crack cocaine.

On or about August 11, 2018, LAKE distributed heroin to BARTON.

154. On or about August 11, 2018, at approximately 10:18 p.m. (Sessions 1185-1187, 1189, 1191, 1193, 1195, 1197, 1204, 1206, 1208), BARTON, who was using Target Phone 6 exchanged the following electronic communications with LAKE, who was using Target Phone 5:

BARTON: What up

BARTON: What up cuz

LAKE: What up playboy

BARTON: Need 2 see u

LAKE: OK

LAKE: I'm here

BARTON: Ok

LAKE: Ok

155. On or about August 11, 2018, at approximately 10:59 p.m., LAKE, who was using Target Phone 5, exchanged the following electronic communications with BARTON, who was using Target Phone 6 (Session 1204, 1206, 1208):

BARTON: Im herd

BARTON: Here

LAKE: Ok

156. At approximately the same time, agents, who were conducting surveillance via pole camera, observed a Nissan SUV park on the street in front of the **Lake Residence**. BARTON³¹ exited the vehicle and walked into the front door of the **Lake Residence**.

157. Several minutes later, at approximately 11:05 p.m., BARTON walked out of the front door of the **Lake Residence**, entered the SUV, and drove away. Based on my training and experience, including the July 7, 2018 stop of BARTON and seizure of narcotics from his vehicle, my knowledge of the investigation, and the

³¹ Agents recognized BARTON from a driver's license photograph.

intercepted conversations, I believe BARTON went to the **Lake Residence** to obtain a resupply of heroin from LAKE, for subsequent distribution.

On or about August 12, 2018, HUDSON collected proceeds from MOORE and distributed heroin to MOORE.

158. On or about August 12, 2018, at approximately 9:25 a.m. (Sessions 1015-1018, 1021), Steven MOORE (AKA “Mann”), who was using Moore Phone 1, exchanged the following electronic communications with HUDSON, who was using Target Phone 3.

MOORE: Come get this money church

HUDSON: Wya (where you at)

MOORE: Block (MOORE was observed on video surveillance sitting on the front porch of **158 North LaPorte**)

HUDSON: Ok

HUDSON: On my way now

159. On August 12, 2018 at approximately 10:18 a.m., HUDSON’s white Pontiac Grand Prix parked in front of **158 North LaPorte**. MOORE, who was seated on the front porch, walked in the front door of **158 North LaPorte**. Shortly after entering, MOORE exited the front door carrying a brown paper bag in his left hand. MOORE approached the driver’s window of HUDSON’s vehicle and handed the bag to HUDSON through the window. MOORE then removed U.S. currency from his left pants pocket, counted it, and handed it to HUDSON through the window. MOORE returned to the porch and HUDSON drove away from the location.

160. On the same day, at approximately 7:50 p.m. (Session 1053), Steven MOORE (AKA “Mann”), who was using Moore Phone 1, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, MOORE told HUDSON he needed 25 grams of heroin. Specifically, MOORE asked, “Man, you around?” HUDSON responded, “Yeah.” MOORE stated, “Man shit, n***a said he wanted a quarter [25 grams of heroin].” HUDSON asked, “Okay. Where you at?” MOORE replied, “I’m on, I’m on LaPorte. I’m on the block.” HUDSON stated, “Alright. I’m heading up there.”

161. On the same day, at approximately 8:05 p.m., HUDSON’s white Pontiac Grand Prix was observed parked on the street in front of approximately **158 North LaPorte**, Chicago, Illinois. MOORE walked to the driver’s side window of HUDSON’s vehicle and reached through the window. Based on my training and experience, knowledge of the investigation, and intercepted phone calls, I believe MOORE had a customer requesting to purchase 25 grams of heroin and MOORE contacted HUDSON to obtain the heroin. HUDSON delivered the 25 grams of heroin to MOORE from his car in front of **158 North LaPorte**.

On or about August 15, 2018, Eddie YOUNG coordinated a meeting with LAKE to obtain heroin and turn narcotics proceeds over to LAKE.

162. On or about August 15, 2018, at approximately 10:10 a.m. (Sessions 1810, 1812, 1814, 1816, 1818, 1820, 1822, 1824, 1826, 1828, 1830, 1832, 1834, 1836, 1838, 1840), Eddie YOUNG, who was using Young Phone 1, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

YOUNG: U got that new for me [new batch of heroin]

LAKE: Yeah

LAKE: But about the old

LAKE: But what about the old

YOUNG: What old my n***a

YOUNG: I got it

LAKE: what you owe me [YOUNG owed LAKE money for the previous delivery of heroin]

YOUNG: 1500 [dollars]

LAKE: 1600 [dollars]

YOUNG: Or 1600 one of them

LAKE: Yeah

YOUNG: Ok

LAKE: OK

LAKE: When you want me to come over

YOUNG: About 5 or 6

LAKE: OK

163. On or about August 15, 2018, at approximately 12:32 p.m. (Sessions 1871, 1883, 1885, 1887, 1889), Eddie YOUNG, who was using Young Phone 1, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

YOUNG: Yo

LAKE: What up

YOUNG: U ready my n***a

LAKE: You said 5 or 6

YOUNG: Ok call me

164. On or about August 15, 2018, at approximately 8:46 p.m. (Sessions 2059, 2061, 2063, 2065), Eddie YOUNG, who was using phone number 773-565-5400, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

YOUNG: Yo my n***a what time in the morning

LAKE: Early

YOUNG: Ok. Bring that [heroin] my n***a

LAKE: OK

165. On or about August 16, 2018, at approximately 8:48 a.m. (Sessions 2073, 2077, 2079, 2081, 2083, 2085, 2087, 2089, 2091, 2095), Eddie YOUNG, who was using Young Phone 1, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

YOUNG: Yo

LAKE: Good morning

YOUNG: Was up fool

LAKE: Buy a ounce [of heroin] until I can make it to you today

YOUNG: Ok than

YOUNG: Ok now I got two bags [of heroin] left [for sale]

LAKE: OK

LAKE: But I'll see you today

YOUNG: Ok I'll get one

LAKE: OK

166. Based on my training and experience, my knowledge of the investigation, and the context of the conversation, I believe that YOUNG called LAKE to order more heroin, and LAKE told YOUNG he owed LAKE \$1600 and that LAKE would bring him drugs and pick up the money in the morning. The next morning, LAKE told YOUNG to buy an ounce of heroin from somewhere else, and arranged to meet YOUNG later in the day, and YOUNG agreed.

On or about August 20, 2018, HUDSON called Lawrence JONES to collect narcotics proceeds.

167. On or about August 20, 2018, at approximately 4:36 p.m. (Session 1713), LAWRENCE JONES (aka "Fish"), who was using Jones Phone 1, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES told HUDSON he did not have the money he owed him. JONES asked, "Yo?" HUDSON stated, "Yo." JONES replied, "Hello?" HUDSON asked, "What up playboy?" JONES replied, "Didn't get your hundred [dollars] yet, Joe. [Unintelligible] soon as he call me, [unintelligible] I'm gonna call you." HUDSON stated, "Alright." JONES responded, "Alright. I got you though, Whitey." HUDSON stated, "Alright" JONES stated, "I'm gonna get you something [JONES will pay HUDSON]."

168. Based on my training and experience, and my knowledge of the investigation and intercepted phone calls, I believe JONES owed HUDSON \$100 for

narcotics and JONES was explaining that he had not collected the money yet and would call HUDSON once he received the money.

On or about September 5, 2018, HUDSON distributed heroin to JONES.

169. On or about September 5, 2018, at approximately 1:40 p.m. (Session 2519), Lawrence JONES (AKA "Fish"), who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES asked HUDSON to provide him with heroin. Specifically, JONES asked, "What's going on?" HUDSON stated, "Same thing." [Same amount of heroin HUDSON provided JONES on a previous occasion] JONES stated, "Okay. Yeah, yeah, yeah, where you at?" HUDSON responded, "I'm finna to be on my way, I'm finna pick my son up from school, I'll be over there exactly 2 o'clock." JONES replied, "Aight." HUDSON stated, "I'll call you when I get close."

170. On the same day, at approximately 2:02 p.m. (Session 2523), JONES, who was using Jones Phone 1, had a conversation with HUDSON, who was using Target Phone 3. JONES answered, "Yeah, cuz." HUDSON stated, "I'm gonna be pulling up church." JONES asked, "Where, uh, where you pulling to?" HUDSON asked, "Huh?" JONES responded, "Pull on Maypole." HUDSON asked, "LaPorte?" JONES stated, "Maypole. Maypole." HUDSON replied, "Okay, okay."

171. Four minutes later, at approximately 2:06 p.m. (Session 2524), JONES, who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. HUDSON answered, "Yo." JONES stated, "Yeah, let me know when you get there." HUDSON stated, "I'm here." JONES stated, "Oh, alright."

172. At approximately the same time, surveillance agents observed HUDSON's white Pontiac Grand Prix park on the street in front of approximately 5017 West Maypole Avenue, Chicago, Illinois. Agents observed JONES exit the basement apartment of 5017 West Maypole Avenue and enter the back seat of HUDSON's vehicle. Shortly after entering the vehicle, JONES exited the vehicle and returned to the basement apartment of 5017 West Maypole Avenue. After JONES entered the apartment, HUDSON drove away from the location. Based on my training and experience, knowledge of the investigation, and intercepted phone calls, I believe HUDSON and JONES engaged in a narcotics transaction.

On or about September 9, 2018, LAKE distributed heroin to BARTON.

173. On or about September 9, 2018, at approximately 7:08 a.m., BARTON, who was using Target Phone 6, exchanged the following electronic communications with LAKE, who was using Target Phone 5 (Session 116, 118, 120, 122, 124):

LAKE What up playboy

BARTON: What up cuz

LAKE: Ready whenever you are [LAKE is ready for BARTON to pick up narcotics from his residence]

BARTON: ok

174. On or about September 9, 2018, at approximately 7:48 a.m., BARTON, who was using Target Phone 6, exchanged the following electronic communications with LAKE, who was using Target Phone 5 (Session 126, 128):

BARTON: Here

LAKE: OK

175. At approximately the same time, agents who were conducting surveillance via pole camera observed a black Honda Accord park on the street in front of the **Lake Residence**.

176. At approximately 8:26 a.m., agents, who were conducting surveillance via pole camera, observed a Gold Ford Taurus drive north on the 400 block of Geneva Avenue, Bellwood, Illinois. Agents then observed LAKE walk south on Geneva Avenue and enter the front door of the **Lake Residence**. BARTON exited the black Honda Accord and followed LAKE into the **Lake Residence**.

177. At approximately 8:33 a.m., BARTON exited the **Lake Residence** carrying a white plastic bag, entered the black Honda Accord, and drove north on Geneva Avenue.

178. Based on my training and experience, my knowledge of the investigation, including previous and subsequent intercepted conversations, I believe that LAKE supplied BARTON with heroin for distribution at the **Lake Residence**.

On or about September 9, 2018, LAKE directed BARTON to supply JONES with heroin.

179. On or about September 8, 2018, at approximately 9:44 p.m. (Session 2810), JONES, who was using Jones Phone 2, had a conversation with HUDSON, who was using Target Phone 3. During the conversation, JONES asked HUDSON to provide him with heroin. HUDSON answered, "Yo." JONES stated, "What up, lifestyle?" HUDSON asked, "What up, Joe?" JONES replied, "What's the business? What the [Unintelligible] is? [Unintelligible]" HUDSON replied, "Nothing, chilling.

[Both talking at once]" JONES asked, "What- where's the- where's the action [narcotics]?" HUDSON asked, "Huh?" JONES asked, "You heard the word of the action [narcotics]?" HUDSON stated, "Man, I missed out, Joe." [HUDSON does not have any narcotics] JONES asked, "You did?" HUDSON replied, "Yup. I-I have something for you Monday." [HUDSON will have more narcotics on Monday]. JONES asked, "So you didn't go [to the **Lake Residence**] today then, huh?" HUDSON stated, "Nope." JONES replied unintelligibly. HUDSON asked, "Huh?" JONES asked, "Did- did they do it?" HUDSON stated, "I ain't hear you." JONES asked, "I said did they do something [package narcotics for street sales] today?" HUDSON stated, "Yup." JONES asked, "You sure?" HUDSON stated, "Yeah. Why?" JONES, stated, "Huh?" HUDSON stated, "Yeah... you- you were all good." [HUDSON thought JONES had enough narcotics] JONES stated, "Shit, aw okay, then. So I guess he [LAKE] finna get up with me in a little while then." HUDSON stated, "Right. You straight." JONES stated, "Oh, aight."

180. On the same day, at approximately 8:46 p.m. (Session 4275, 4277, 4282, 4284, 4288, 4290, 4292, 4924, 4296, 4298), LAKE, who was using Target Phone 5, exchanged the following electronic communications with JONES³², who was using 773-827-7416 ("Jones Phone 3"):

JONES: What's up with da action [narcotics]?

³² Agents identified JONES as the user of Jones Phone 3 based on the self-identification in the electronic messages. In addition, agents compared the voice of the user of Jones Phone 3 with the voice of the user of Jones Phone 1 and Jones Phone 2 and determined them to be the same individual.

JONES: This fish new#

LAKE: What up team is

LAKE: What up team

JONES: I need some action [narcotics]

JONES: What da business? Team

LAKE: What you mean

JONES: I aint had nothing all day, and da hoe [cocaine] dont move [sell] without a pimp [heroin].

LAKE: Aw

LAKE: What Lil homie [BARTON] say

181. On the same day, at approximately 10:17 p.m. (Sessions 4300, 4302, 4304, 4306, 4308), LAKE, who was using Target Phone 5, exchanged the following electronic communications with BARTON, who was using Target Phone 6:

LAKE: What up playboy

LAKE: What fish talking about [Does JONES need to be resupplied with narcotics?]

BARTON: When I talk 2 him he was good [JONES did not tell BARTON he needed more narcotics]

LAKE: OK

181. On or about September 8, 2018, at approximately 10:24 p.m., LAKE, who was using Target Phone 5, exchanged the following electronic communications with LAWRENCE JONES, who was using Jones Phone 3 (Sessions 4214, 4218, 4220).

LAKE: So we good [Do you have enough narcotics]

JONES: Yes sir, absolutely!

LAKE: OK

182. On or about September 8, 2018, at approximately 10:24 p.m., LAKE, who was using Target Phone 5, exchanged the following electronic communications with DERRON BARTON, who was using Target Phone 6 (Sessions 4316, 4322, 4324)

LAKE: So we good

BARTON: Yeah he said he text me but i been waiting on him all day im about 2 get up wit him i need 2c u in the am 2 [BARTON was waiting to be contacted by JONES to provide him with narcotics. BARTON will need to pick up narcotics from LAKE the following morning.]

LAKE: OK

183. Based on my training and experience, knowledge of the investigation, and intercepted phone calls, I believe JONES contacted HUDSON to obtain more narcotics. HUDSON did not have any heroin to provide JONES, so JONES contacted LAKE, who directed BARTON to supply JONES with heroin.

On or about September 13, 2018, LAKE distributed heroin to BARTON.

184. On or about September 13, 2018, at approximately 7:08 a.m. (Session 4725, 4727, 4279, 4731, 4735, 4737), BARTON, who was using Barton Phone 3³³, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

BARTON: What up cuz

LAKE What up playboy

BARTON: Need 2 c u

LAKE: OK

BARTON: Ok

LAKE: OK

185. On or about September 13, 2018, at approximately 2:15 p.m. (Session 4759, 4761), BARTON, who was using Barton Phone 3, exchanged the following electronic communications with LAKE, who was using Target Phone 5:

BARTON: Im here

LAKE: OK

186. At approximately the same time, agents, who were conducting surveillance via pole camera, observed a black Honda Accord park on the street in

³³ Law enforcement identified BARTON as the user of 773-703-4809 based on the following: Target Phone 6 was deactivated due to non-payment on September 10, 2018. The same day 773-703-4809 text messaged LAKE on Target Phone 5, stating, "Just giving u the line." BARTON used 773-703-4809 to coordinate distribution of heroin from LAKE on September 13, 2018.

front of the **Lake Residence**. BARTON exited the vehicle and walked in the front door of the **Lake Residence**.

H. Narcotics Distribution Activities at 158 North LaPorte

187. Throughout the wiretap investigation, agents conducted remote surveillance through a Chicago Police Department pod cameras in the vicinity of **158 North LaPorte**. According to information provided by open source realty websites, **158 North LaPorte** is a two unit residential building. According to information provided by the Cook County Treasurer's Office, the property was at one time purchased by B. and J. H., but went into foreclosure and is currently bank-owned. According to information provided by Commonwealth Edison, there are two active electricity service accounts, one for "Unit 1" in the name of A.H., and one for "Unit 2" in the name of J.J.

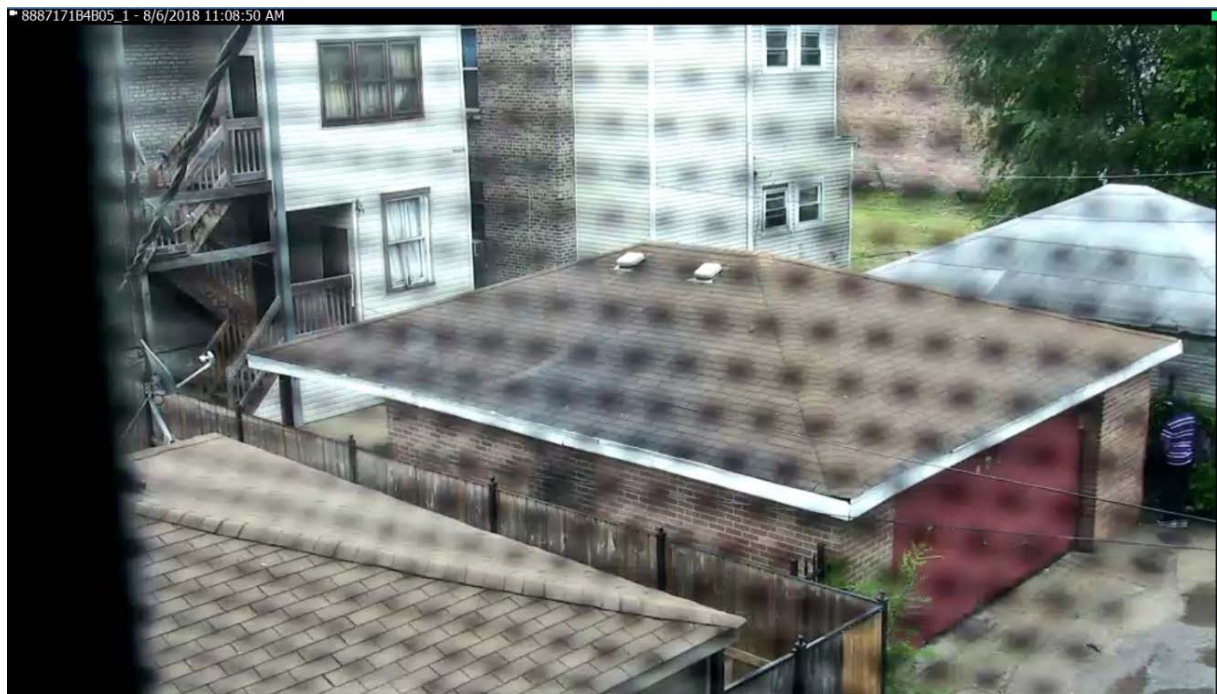
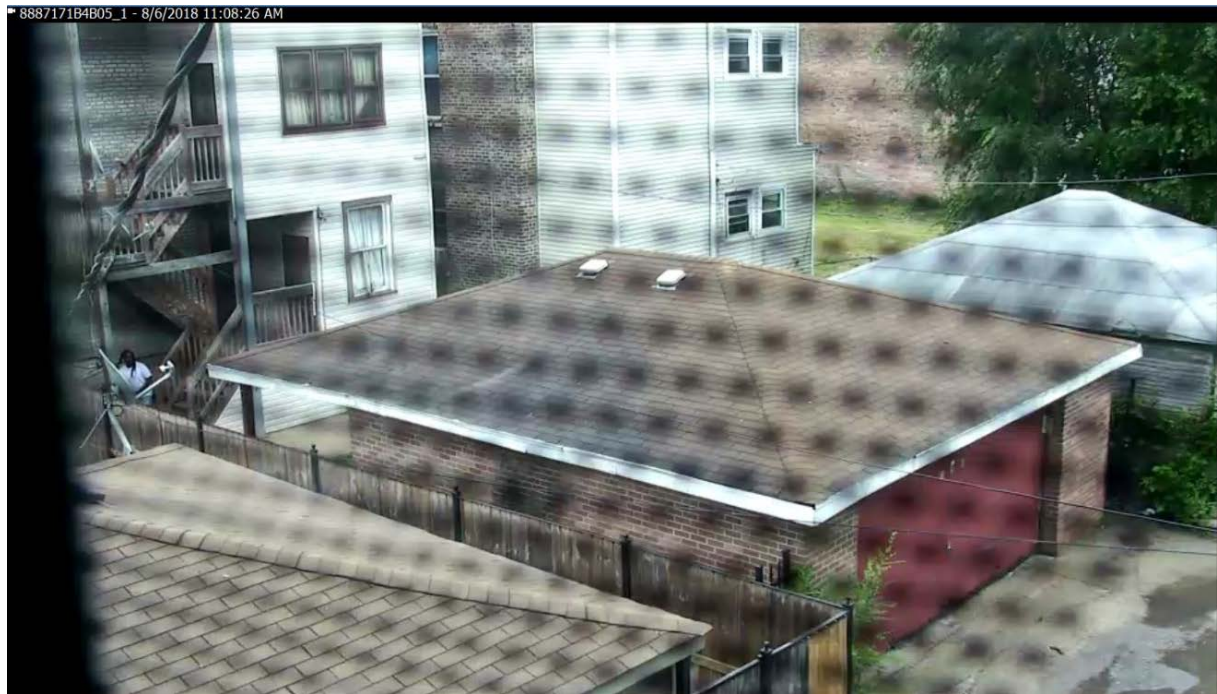
188. Two separate pod cameras captured activity at both the front of **158 North LaPorte**, facing the street, and the back of the residence, facing the garage and the gate to the adjoining alley. During the course of the investigation, agents observed numerous hand to hand transactions occurring at that residence, between unknown individual customers and MOORE, HUGHES, VIVETTER, and RATLIFF at the front and back of the residence.







189. In addition, agents have also observed, on numerous occasions, that LAKE DTO members visit the basement unit of the residence (through a rear staircase) before distributing heroin to walk-up customers or after receiving a supply of heroin from HUDSON or BARTON. For example, on August 6, 2018, at approximately 11:08 a.m., agents observed through remote surveillance MOORE emerge from the basement unit at the rear of **158 North LaPorte** and walk to the back gate, where they observed an unknown individual reach through the fence and walk away. The photographs depicted below are still shots from the pod camera surveillance footage of the transaction:



190. Further, on three separate occasions, agents have seized narcotics from customers of **158 North LaPorte** after observing them to engage in a hand to hand transaction at **158 North LaPorte**.

On or about August 24, 2018, MOORE distributed heroin to Individual B.

191. At approximately 2:00 p.m., law enforcement officers observed an unknown male wearing a bright orange sweatshirt approach the front gate of **158 North LaPorte**, and then walk through the adjacent vacant lot toward the back of **the building**. At the rear of the building, agents observed MOORE walk down into the basement unit. Several seconds later, agents observed MOORE emerge from the basement unit and walk toward the rear gate at the alley. At approximately 2:04 p.m., officers observed MOORE engage in a hand to hand transaction, through the gate at the rear of **158 North LaPorte**, with the unknown male. The photographs depicted below are still shots from the pod camera surveillance footage of the transaction:





192. Officers maintained surveillance of the unknown male as he departed the area on foot, and stopped him at approximately 147 N. Lavergne. Upon their approach, officers observed the unknown male put a piece of silver tinfoil in his mouth. Officers identified him as Individual B and recovered the tinfoil after the he spit it on the ground. The tinfoil contained a brown powdery substance that field tested positive for the presence of heroin and weighed 0.5 grams with the tinfoil packaging. The suspected heroin has been submitted to the DEA laboratory for confirmatory analysis and results are pending. Individual B was released without charges.

On or about August 30, 2018, RATLIFF distributed heroin to Individual C.

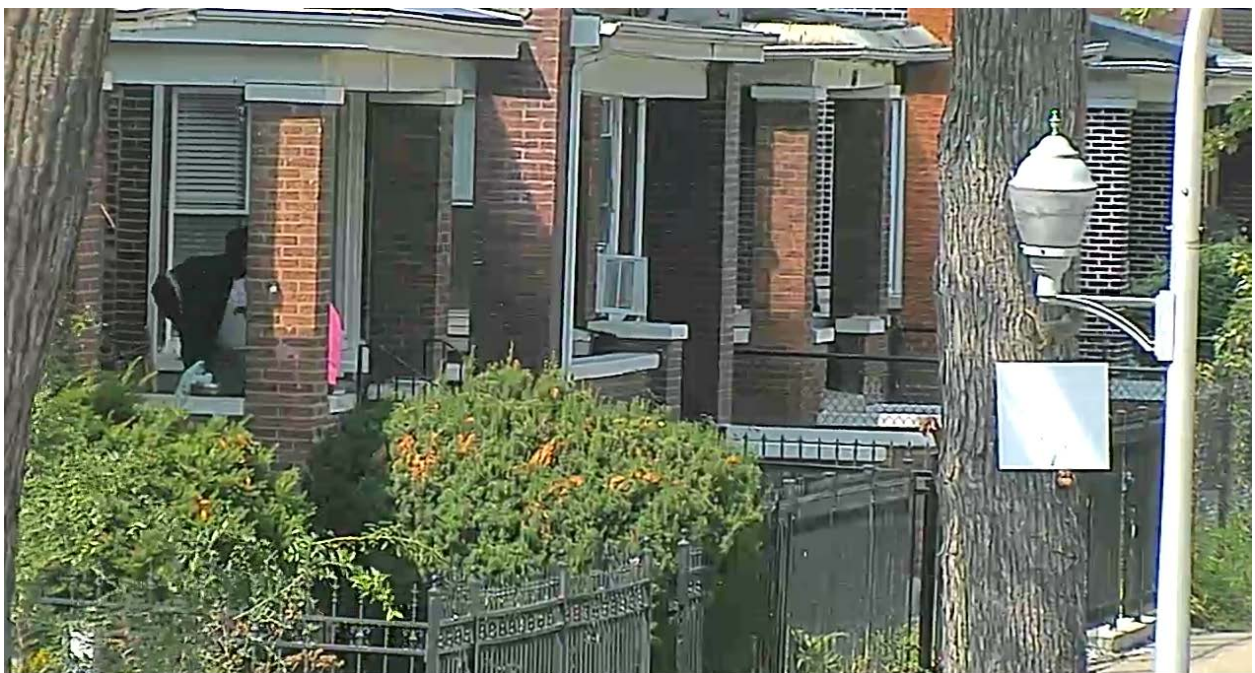
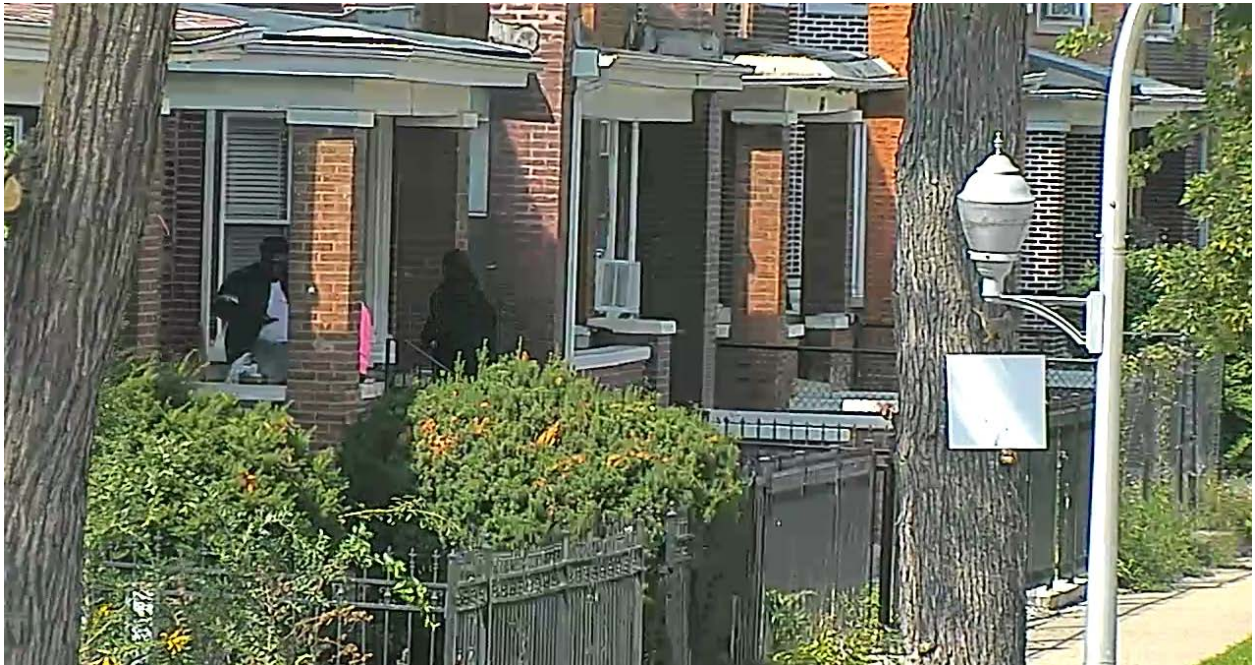
193. On or about August 30, 2018, at approximately 12:10 p.m., law enforcement officers observed Deandre HUGHES, Steven MOORE, Romell RATLIFF, and four other unidentified black males standing on the front porch of **158**

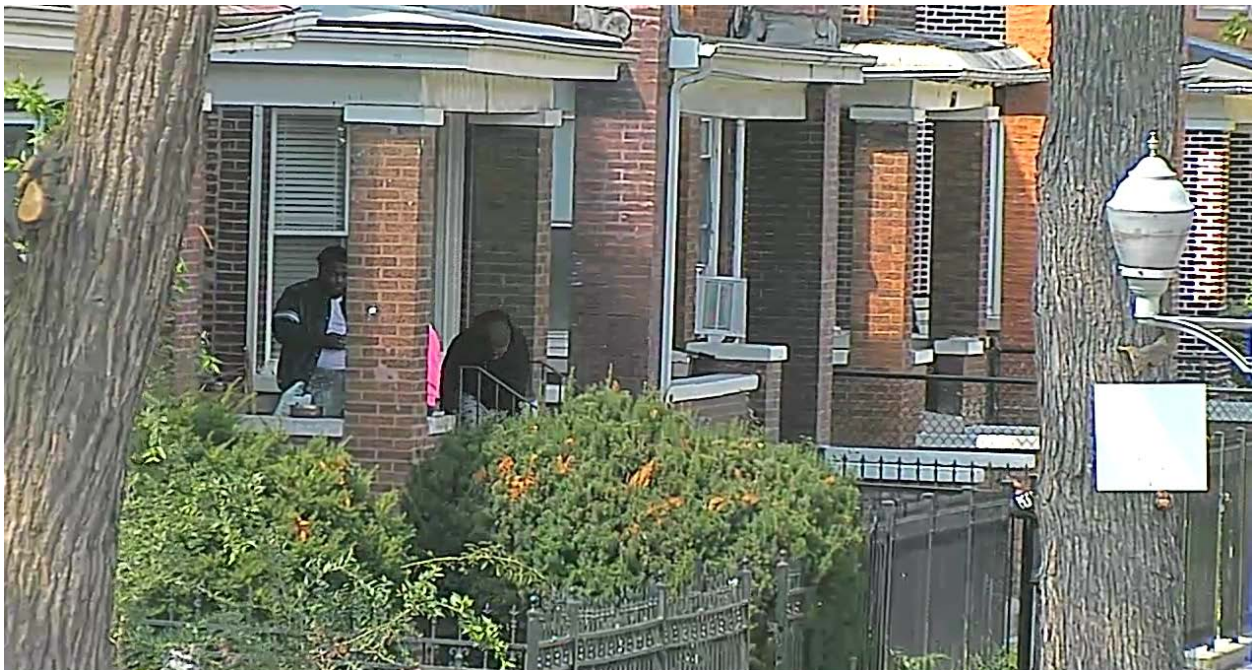
North LaPorte, Chicago, Illinois. HUGHES handed a clear plastic bag to RATLIFF, who after receiving the bag walked to the front gate. An unknown black female walked south on North LaPorte and met RATLIFF at the front gate. Officers observed RATLIFF and the unknown female engage in a hand to hand transaction. Following the transaction, the female walked north on North LaPorte and entered a black Kia SUV. Officers maintained surveillance of the vehicle as it departed the area, and stopped the vehicle at approximately 4437 West Madison Street. Upon making contact with the female, officers identified her as Individual C. Individual C surrendered a small, clear ziplock plastic bag that had black wings printed on it, and was stapled at the top. The bag contained a piece of folded tinfoil. The tinfoil contained a brown powdery substance that field tested positive for the presence of heroin and weighed 0.5 grams with the tinfoil packaging. The suspected heroin has been submitted to the DEA laboratory for confirmatory analysis and results are pending. Individual C was released without charges.

On or about September 10, 2018, VIVETTER distributed heroin to Individual D.

194. On or about September 10, 2018, at approximately 2:03 p.m., law enforcement officers observed Clayvon VIVETTER, seated on the front porch of **158 North LaPorte**, Chicago, Illinois, with an unknown black female, who was wearing a pink sweatshirt. An unknown male walked south on North LaPorte and past Romell RATLIFF, who was standing at the front gate of **158 North LaPorte**. The unknown male opened the front gate and walked onto the front porch of **158 North LaPorte**. Officers observed VIVETTER reach into a jacket pocket and engage in a hand to hand

transaction with the unknown male, who then bent over and appeared to place the object received from VIVETTER in his sock. The photographs below are still frames from the pod camera surveillance footage of the transaction.





195. Officers observed the unknown male walk off the porch and entered the front passenger's seat of a black Ford Explorer. Officers maintained surveillance of the vehicle as it departed the area. The vehicle stopped at approximately 4900 West Maypole Avenue. The unknown male got out of the front passenger's seat and walked

northbound on north Lamon Avenue from West Maypole. Officers made contact with the unknown male at approximately 204 North Lamon Avenue, and identified him as Individual D. Individual D told Officers that he had, “couple blows” [bags containing heroin] in his sock. Individual D removed his left shoe and pulled two (2) small, clear ziplock plastic bags that had “8 balls” printed on them, and were stapled at the top. The bags contained folded tinfoil. The tinfoil contained a brown powdery substance that field tested positive for the presence of heroin and weighed 1.2 grams with the tinfoil packaging. The suspected heroin has been submitted to the DEA laboratory for confirmatory analysis and results are pending. Individual D was released without charges.

I. Additional Information

196. Through training, experience, and discussions with other experienced agents, I know that:

- a. Drug traffickers commonly maintain books, papers, files, and other records which reflect the names, addresses and/or telephone numbers of their suppliers, couriers, customers, and other associates in the illegal drug trade.
- b. Drug traffickers maintain books, records, receipts, notes, ledgers, airline tickets, money orders, and other files relating to the purchase, packaging, sale, distribution, and transportation of their product.
- c. Drug traffickers conceal in their residences and/or places of business the proceeds of their illegal activity, including large amounts of United

States currency, financial instruments, precious metals, jewelry, rare coins, works of art, and other items of value, as well as books and records regarding the acquisition, use, and disposition of such items of value.

- d. When drug traffickers amass large proceeds from the sale of controlled substances, they attempt to legitimize these profits, often accomplishing this goal by using the services of banks, other financial institutions, and real estate brokers; and maintain books and papers related to such efforts.
- e. It is common for drug traffickers to maintain the aforementioned books, papers, and documents in secure places within their residences and/or places of business so that the drug traffickers have ready access to such information.
- f. Drug traffickers frequently take, or cause to be taken, photographs of themselves, their associates in the drug trade, property acquired from the distribution of drugs, and their product, and such photographs are often kept in their residences and/or places of business.
- g. Drug traffickers often place assets, including real and personal property, such as vehicles, in names other than their own to avoid the detection and forfeiture of such assets by government agencies; and that the drug traffickers continue to use these assets and to exercise dominion and control over them even though the assets are nominally owned by others.

- h. It is common practice for drug traffickers to conceal in their residences and/or places of business secure places to store the contraband including but not limited to safes and that once a sizeable load of contraband has been delivered, to repackage and break-down larger quantities of illegal drugs into smaller more easily handled and concealed quantities for distribution; and that paraphernalia related to the packaging, cutting, weighing and distribution of contraband is usually secreted or stored in their residences and/or places of business.
- i. Drug traffickers frequently possess firearms and ammunition to protect their illegal product.
- j. Drug traffickers frequently keep the aforementioned evidence set forth in their residences because, for example, drug traffickers keep detailed records of their activities close at hand as they receive calls from other members of the organization at all hours of the day and night, and need access to those materials. Additionally, although some drug traffickers prefer to store contraband outside of their known places of residence, in my training and experience, they do not have the same concerns when it comes to items set forth in above because said items are not illegal to possess.

197. In addition, during the course of such residential searches, I and other agents have also found items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the subject premises. Such

identification evidence is typical of the articles people commonly maintain in their residences, such as canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys.

a. No Knock Warrant at the Lake Residence

198. On or about August 18, 2018, at approximately 12:27 p.m. (Session 2416), Individual A, who was using 773-417-8567, had a conversation with LAKE, who was using Target Phone 5, during which LAKE discussed his possession and use of a firearm in connection with his narcotics trafficking activities.

a. During the conversation, LAKE stated, "Fools want me to come down and make a statement." Individual A stated, "Oh wow. "So that's why I ain't around there. Cause I ain't trying to fuck with..." LAKE stated, "Right. And I gotta, I gotta have that, have my bump [gun] on me, and this and that, and I'm telling him, man Joe. If I got to go anywhere, and I gotta have that [gun] with me, I ain't going."

b. Later during the conversation, LAKE stated, "Every time I gotta go see, [if] every time I come to see my homie I gotta have it [gun] on me, I'm gonna have my homie come and see me." Individual A stated, "Yep." LAKE stated, "Unless a n***a got 7,500 [dollars], to 10,000 [dollars] put up for some, for some, for some goofy shit." Individual A stated, "Right, cause that's, that's all you'll be doing, is having some goofy shit." LAKE stated, "A n***a would rather bond out of jail for 15,000 instead of buying a house for 15,000." Individual A stated, "Right, and that's crazy." LAKE

stated, "And you know that's crazy." Individual A stated, "You know where the, where the logic in that at? Ain't no log, that's not logical at all man."

c. Based on my training and experience, knowledge of the investigation and intercepted phone calls, I believe LAKE told Individual A that he keeps a firearm for protection, that he avoids going to places where he needs to bring a gun for protection, because of the risk of being arrested by law enforcement for illegal possession of the firearm (LAKE is a convicted felon), and that he holds necessary meetings with narcotics associates at the **Lake Residence** to avoid that risk.

199. Based on my training and experience, and the training and experience of other law enforcement officers, and my knowledge of the investigation, including the above-described intercepted conversations, as well as previous and subsequent conversations, and the pattern of conduct observed on surveillance at the **Lake Residence**, I believe that LAKE owns a firearm and keeps it as his residence, and that he uses it for protection when he holds necessary meetings with narcotics associates, including his regular meetings with HUDSON and WILLIAMS, during which LAKE, HUDSON and WILLIAMS prepare and package bulk quantities of narcotics for distribution by co-conspirators, at the **Lake Residence**. For these reasons, I respectfully submit there is reasonable suspicion that knocking and announcing law enforcement's presence, under the particular circumstances, would be dangerous and futile, and that it would inhibit the effective investigation of the crime by, for example, allowing the destruction of evidence.

200.

CONCLUSION

201. Based on the foregoing, I respectfully submit that there is probable cause to believe the following:

a. Beginning no later than November 22, 2017 and continuing to in or about October 4, 2018, in the Northern District of Illinois and elsewhere, defendants DIAMOND LAKE, DARNELL HUDSON, ANTWION WILLIAMS, DERRON BARTON, STEVEN MOORE, ROMELL RATLIFF, DEANDRE HUGHES, LAWRENCE JONES, CLAYVON VIVETTER, WILLIE BLAKE and EDDIE YOUNG, did conspire with each other, and with others known and unknown to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1), all in violation of 21 U.S.C. § 846.

b. On or about June 18, 2018, TYJUAN YATES did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

202. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Sections 841 and 846, have been committed, and that evidence, instrumentalities, fruits, and contraband relating to this criminal conduct, as further

described in Attachment B, will be found in the Subject Premises, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the single family residence and garage located at 417 Geneva Avenue, Bellwood, Illinois, more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.

BRIAN J. BRADLEY
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on October 1, 2018.

M. David Weisman
United States Magistrate Judge