

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of California



United States of America )

v. )

Kristopher Thomas, Justin Damonte Mitchell, Derrick )  
D. Charles, and Natasha Michelle Bailey. )

Case No. 5:24-mj-00006-CDB )  
)  
)  
)  
)

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of May 1, 2022, to December 29, 2022 in the county of Kern in the Eastern District of California and elsewhere, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 846;	Conspiring to distribute and possess with intent to distribute methamphetamine and fentanyl; and
21 U.S.C. Sections 841(a)(1) and 841(b)(1)(A).	Distribution of methamphetamine (Thomas and Mitchell only).

This criminal complaint is based on these facts:

See Affidavit, attached hereto and incorporated herein by reference.

Continued on the attached sheet.

Complainant's signature

Nicholas B. Stirling, DEA Special Agent

Printed name and title

Sworn to before me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d)..

Date: February 14, 2024

Judge's signature

City and state: Bakersfield, California

Christopher D. Baker, U.S. Magistrate Judge

Printed name and title

1  
2 **AFFIDAVIT IN SUPPORT OF COMPLAINT AND SEARCH WARRANT**

3 I, Nicholas B. Stirling, Special Agent of the United States Drug Enforcement Administration,  
4 being first duly sworn, do hereby declare and state as follows:

5 **I. INTRODUCTION AND AGENT BACKGROUND**

6 1. I make this affidavit in support of a criminal complaint and issuance of arrest warrants, as  
7 well as an application for a search warrant, as follows. Specifically, I am seeking a criminal complaint  
8 charging **Kristopher Thomas**, aka “Broski,” with distributing at least 500 grams of a mixture or  
9 substance containing methamphetamine and at least 50 grams of methamphetamine, a schedule II  
10 controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A). I am also seeking to  
11 charge **Thomas** and **Justin Damonte Mitchell** with conspiring to distribute and possess with intent to  
12 distribute at least 500 grams of a mixture or substance containing a detectable amount of  
13 methamphetamine and at least 50 grams of methamphetamine, a Schedule II controlled substance, in  
14 violation of 21 U.S.C. §§ 846 and 841(b)(1)(A). I am further seeking to charge **Thomas, Justin**  
15 **Mitchell, Natasha Michelle Bailey**, and **Derrick D. Charles** with conspiring to distribute and possess  
16 with intent to distribute at least 40 grams of a mixture or substance containing a detectable amount of N-  
17 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as “fentanyl,” a Schedule II  
18 controlled substance, in violation of 21 U.S.C. §§ 846 , 841(a)(1), and 841(b)(1)(B).

19 2. I am further seeking a search warrant under Federal Rule of Criminal Procedure 41 to  
20 search the following location, more particularly described in Attachment A, attached herein and  
21 incorporated herein by reference, and referred to herein as **502 Isla Bonita Street, Bakersfield,**  
22 **California 93307**, the residence of **Bailey**, (referenced herein as the “**SUBJECT PREMISES**”), for  
23 evidence, fruits, and instrumentalities, as more particularly described in Attachment B, attached hereto  
24 and incorporated herein by reference of violations of 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(B),  
25 conspiracy to distribute and possess with intent to distribute fentanyl.

26 3. It is my opinion, based on my training and experience, and the training and experience of  
27 other law enforcement investigators with whom I have spoken, that the items listed in Attachment B,  
28 attached hereto and incorporated herein by reference, are items most often associated with the

1 trafficking and distribution of controlled substances, as well as the proceeds from such illegal  
2 operations.

3 4. I have been employed as a Special Agent (SA) with the Drug Enforcement  
4 Administration (DEA) since September 2019. Since August 2020, I have been assigned to the DEA's  
5 Bakersfield Resident Office in Bakersfield, California. As part of my training, I received approximately  
6 18 weeks of training in the area of narcotics investigations at the DEA Justice Training Center in  
7 Quantico, Virginia.

8 5. Prior to being employed by the DEA, I was a Border Patrol Agent (BPA) and Emergency  
9 Medical Technician (EMT) with the United States Border Patrol (USBP) from 2018 to 2019, stationed  
10 in Rio Grande City, Texas. As a part of that training, I received approximately twenty-five (25) weeks  
11 of specialized federal law enforcement training at the Federal Law Enforcement Training Center  
12 (FLETC) in Artesia, New Mexico. This training included the detection, interdiction and apprehension  
13 of illegal narcotics crossing the border between Mexico and the United States. My training at FLETC,  
14 as well as my EMT schooling, raised my proficiency in drug identification. While working as a Border  
15 Patrol Agent, I had contact with and arrested persons under the influence of controlled substances and  
16 those who were trafficking controlled substances and seized, processed, and field-tested controlled  
17 substances.

18 6. As a DEA Special Agent, I have been the case agent and assisted other agents and  
19 officers in investigations involving violations of Title 21, United States Code, Section 841(a)(1), the  
20 manufacture of, distribution of and possession with intent to distribute controlled substances; and Title  
21 21, United States Code, Section 846, conspiracy to commit the foregoing. Specifically, those  
22 investigations have focused on the manufacture and distribution of fentanyl, marijuana,  
23 methamphetamine, heroin, and cocaine. I am familiar with, and have participated in, conventional  
24 investigative methods, including, but not limited to, electronic surveillance, visual surveillance, wiretap  
25 investigations, questioning of witnesses, search warrants, confidential informants, and pen registers. I  
26 have also become acquainted with the various methods used by individuals to possess, transport, and sell  
27 controlled substances in violation of federal law.

28 7. The facts in this affidavit come from my personal observations, my training and

1 experience, and information obtained from other agents, law enforcement officers, and witnesses. As set  
2 forth in more detail below, the charges are based, in part, on a series of drug transactions that occurred in  
3 Hawaii and led to the initiation of a wiretap investigation spanning approximately seven months in the  
4 Eastern District of California, where **Thomas**, a Main Street Mafia Crip<sup>2</sup> gang member and inmate at  
5 Kern Valley State Prison resides and was coordinating drug trafficking activities and promoting a  
6 scheme to obtain significant COVID-19-related tax credits.

7 8. The information set forth in this affidavit is not intended to detail each and every fact and  
8 circumstance of the investigation or all the information known to me and other law enforcement  
9 investigators. Rather, this affidavit serves to establish probable cause for the issuance of the requested  
10 search warrants. This affidavit does not set forth all of my knowledge about this matter. Facts not set  
11 forth herein are not being relied on in reaching my conclusion that the requested warrant should be  
12 issued. Nor do I request that this Court rely on any facts not set forth herein in reviewing this  
13 application.

14 9. This court has jurisdiction to issue the proposed warrant because it is a “court of  
15 competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is a district court of the  
16 United States that has jurisdiction over the offenses being investigated. *See* 18 U.S.C. § 2711(3)(A)(i).

## 17 **II. APPLICABLE LAW**

18 10. Title 21, United States Code, Section 841(a)(1) (Distribution and Possession with Intent  
19 to Distribute Controlled Substances), provides that it is unlawful for any person knowingly or  
20 intentionally to distribute or possess with intent to distribute a controlled substance.

21 11. Title 21, United States Code, Sections 841(a)(1) and 846 (Conspiracy to Distribute and to  
22 Possess with Intent to Distribute Controlled Substances), provides that any person who attempts or  
23 conspires to distribute or possess with intent to distribute controlled substances shall be subject to the  
24 same penalties as those prescribed for the offense.

## 25 **III. BASIS OF INFORMATION**

26 12. I make this affidavit based upon my personal knowledge derived from my participation in  
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28 <sup>2</sup> The Main Street Mafia Crips are a street gang located on the east side of South Los Angeles.

1 this investigation and upon information I believe to be reliable from the following sources:

- 2 a) My experience in the investigation of **Thomas** and his drug trafficking organization  
3 (DTO), including DTO members **Bailey, Charles, Mitchell**, Antrell Maeshack Sr (referenced  
4 herein as Maeshack), and Leticia Maddox;
- 5 b) Oral and written reports and documents about this investigation that I have received from  
6 members of the DEA and FBI;
- 7 c) Discussions I have had concerning this investigation with experienced special agents,  
8 officers, and other investigators;
- 9 d) Physical surveillance conducted by the DEA, FBI, and local law enforcement agencies,  
10 the results of which have been reported to me either directly or indirectly;
- 11 e) Public records;
- 12 f) Telephone toll records, pen register and trap and trace information, and telephone  
13 subscriber information;
- 14 g) Statements of a reliable confidential source;
- 15 h) Consensually recorded meeting and consensually recorded phone calls;
- 16 i) The interception of wire and electronic communications of **Thomas** over multiple  
17 contraband cell phones that **Thomas** used in prison;
- 18 j) Prison-issued and monitored tablets used by **Thomas** in prison for calls and text  
19 messages; and
- 20 k) Seizures of fentanyl and methamphetamine facilitated by **Thomas** and other members of  
21 the **Thomas** DTO.

22 **IV. OVERVIEW OF THOMAS'S DRUG TRAFFICKING ORGANIZATION**

23 13. **Kristopher Thomas, aka "Broski"** (referenced herein as **Thomas**), is a long-time  
24 member of the Main Street Mafia Crips (MSMC) and an inmate at Kern Valley State Prison in Delano,  
25 California where he is serving a 50-year to life sentence for a gang-related murder in the first degree.  
26 He is eligible for parole in 2033. He has an extensive criminal history dating back to 2003, including  
27 prior convictions for controlled substance offenses in 2006 and 2016. The investigation has revealed  
28 that from on or about July 12, 2022, to on or about December 17, 2022, **Thomas** was the head of a drug

1 trafficking organization (DTO) that was responsible for the shipment of large quantities of  
2 methamphetamine to Hawaii, Oklahoma, Alabama, and New Jersey, as well as the smuggling of  
3 fentanyl into Kern Valley State Prison on or about September 9, 2022.

4 14. As discussed in more detail below, DEA agents in Hawaii initiated the investigation of  
5 **Thomas** based on information from a reliable confidential source that he/she had received hundreds of  
6 pounds of methamphetamine from an individual known as “Broski,” who was later identified as  
7 **Thomas**. Subsequent recorded negotiations with **Thomas** resulted in the seizure in Oahu, Hawaii of  
8 over 90 pounds of methamphetamine. The Hawaii transactions formed, in part, the basis for the  
9 initiation of a wiretap investigation of **Thomas** by DEA agents in Bakersfield within the Eastern District  
10 of California. From August 2022 to March 2023, DEA agents identified seven contraband cell phones  
11 that **Thomas** used at Kern Valley State Prison and received authorization to intercept communications  
12 from six of these phones. Those intercepts led to the seizure of an additional 54 pounds of  
13 methamphetamine in Oklahoma and Alabama and over half a pound of fentanyl which was smuggled  
14 into Kern Valley State Prison by **Thomas’s** co-conspirators.

15 15. **Mitchell** is an associate of **Thomas** and is a known member of the MSMC. Wire  
16 intercepts and other evidence, as discussed below, indicate that he was involved in conspiring to  
17 smuggle the fentanyl into Kern Valley State Prison, as well as the distribution of methamphetamine to  
18 Oklahoma, Alabama, and New Jersey.

19 16. Wire intercepts and other evidence, as discussed below, indicate that **Bailey**, who resided  
20 and still resides at **502 Isla Bonita Street, Bakersfield, California 93307** (referenced herein as the  
21 “**SUBJECT PREMISES**”), participated in the conspiracy to distribute fentanyl into Kern Valley State  
22 Prison by actually smuggling it into the prison during a visit with **Derrick D. Charles**, an inmate at  
23 Kern Valley State Prison.

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1 V. THE OVERALL DRUG CONSPIRACY

2 A. The Hawaii Investigation Resulted in the Seizure of Over 80 Pounds of  
3 Methamphetamine Attributable to Thomas and His DTO.

4 17. On July 9, 2022,<sup>3</sup> a confidential source (CS)<sup>4</sup> provided detailed information to DEA  
5 Special Agent Gabriel Gray about his/her former drug distribution network in Hawaii and, more  
6 specifically, about how he/she had received large sums of methamphetamine from a drug trafficking  
7 organization on the mainland.<sup>5</sup> The CS stated he/she had been approached by an individual known to  
8 the CS as only “Van” sometime in May 2022 after the CS had been released from prison for a firearms  
9 conviction. Van approached the CS while the CS was at a gas station and asked if the CS knew an  
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11 <sup>3</sup> Any and all references herein to dates and times are to approximate dates and times.

12 <sup>4</sup> The CS has previously been arrested for robbery, assault, trespassing, illegal possession of  
13 narcotics, and unlawful transportation of a firearm. The CS was convicted of assault in 2016 and a  
14 firearms violation in 2019. The CS was arrested in July 2022 for the distribution of methamphetamine.  
15 21 U.S.C. § 841(a)(1). As a result of the CS’s arrest, he/she agreed to assist law enforcement, in the  
16 hopes of receiving reduced charges and/or sentencing consideration. Investigators believe the CS to be  
17 credible and reliable, in part, because the CS admitted his/her criminal conduct immediately at the time  
18 of his/her arrest, and voluntarily provided information about the location of approximately 40 pounds of  
19 methamphetamine, which was supplied by an individual who he/she believed was Broski, an individual  
20 he/she met one time briefly in Oahu and who he/she believed was the supplier. Although the supplier  
21 was actually Thomas, an inmate in a California prison, Thomas’s voice, which was recorded during  
22 conversations with the CS, sounds the same, according to the CS, as well as agents who subsequently  
23 compared these recordings with federally authorized intercepts of the contraband phones that Thomas  
24 used in prison. Further, during conversations with Thomas, the CS referred to Thomas as Broski,  
25 without objection or correction. Notwithstanding the discrepancy in identities, the CS’s information  
26 concerning the drug trafficking organization which supplied methamphetamine to him is deemed  
27 reliable, since the organization has the capability and has, in fact, supplied large quantities of  
28 methamphetamine to the CS, some of which has been seized by law enforcement. Based on the CS’s  
assistance, law enforcement seized an additional 93 pounds of methamphetamine sourced from Thomas.  
The CS was charged federally, and his/her case is pending.

<sup>5</sup> DEA SA Gray is assigned to the DEA Los Angeles Field Division’s Honolulu District Office  
and has been so employed since January 2020. He initiated the investigation which identified BROSKI  
as the CS’s methamphetamine supplier. SA Gray is also the CS’s handler. SA Gray has experience in  
complex narcotics investigations involving CS management. Prior to being assigned to the Los Angeles  
Field Division, he was assigned to the San Diego Field Division, and prior to that he completed sixteen  
weeks of training at the DEA Academy in Quantico, Virginia. Before DEA, he was a police officer with  
the Washington, D.C. Metropolitan Police Department (MPD) from 2015 to 2017. From 2017 to 2019,  
he was a police officer with the San Diego Police Department. During his tenure with both the MPD  
and the SDPD, he was involved in numerous investigations, including the investigation of drug offenses.  
In connection with his official DEA duties, SA Gray investigates criminal violations of federal drug  
laws and related offenses, including violations of Title 21, United States Code, 801 *et seq.* and the  
Federal Controlled Substance Act. He is familiar with and has used many of the traditional methods of  
investigation, including the handling of informants, the debriefing of informants, witness interviews,  
defendant debriefings, undercover operations, and the seizure of drug evidence.

1 individual named “Amigo.”<sup>6</sup>

2 18. The CS stated he/she did, and Van handed a cell phone to the CS. On the other end of the  
3 line was Amigo, also known as Gilbert Garcia, who informed the CS that the CS has a \$100,000.00 drug  
4 debt the CS owed Amigo and asked if the CS was going to take care of it. The CS informed Garcia that  
5 he/she would. Garcia told the CS that Van would give him/her further instructions. Garcia has not had  
6 any direct contact with the CS since the CS was released from prison and has not had any indirect  
7 contact with the CS after the meeting with Van.

8 19. Van told the CS to go to the Pearl City Industrial complex on May 17, 2022, a Thursday,  
9 at 6:00 p.m. The CS complied and, upon arrival, he/she was met by an individual who indicated his  
10 name is “Broski.” Broski gave the CS telephone number (808) 284-8942 (identified as Target  
11 Telephone 1 during the ensuing wiretap investigation) and told the CS to get a phone that he/she would  
12 use only to call that number. According to the CS, the meeting was very brief.

13 20. On May 18, 2022, the CS called Target Telephone 1 and an individual that the CS  
14 believed was the same man he/she met on May 17 in Hawaii answered. Toll analysis confirmed that the  
15 CS made a call to Target Telephone 1 on this date. The user of Target Telephone 1 instructed the CS to  
16 find properties where the CS could receive parcels of methamphetamine. The CS complied and then  
17 texted the addresses to the user of Target Telephone 1. Thereafter, three or four bulk shipments of  
18 methamphetamine were sent to these addresses—200 to 300 pounds at a time—for a total of  
19 approximately 700 to 1,200 pounds of methamphetamine. The user of Target Telephone 1 told the CS  
20 that the CS owed \$3,000 for each pound and said, if the CS was able to sell all of the methamphetamine  
21 within a one-month period, the CS would only owe \$2,500.00 per pound.<sup>7</sup>

22 21. The CS explained that, once a substantial portion of the methamphetamine was sold, one  
23 of Broski’s associates would travel to Hawaii to pick up the proceeds. The CS stated the last time he/she  
24 met with one of Broski’s associates was during the first week of July 2022. The CS showed DEA

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25 <sup>6</sup> “Amigo” was the name of the CS’s former source of supply in 2018 before the CS went to  
26 prison. The DEA has been investigating “Amigo,” whose name is Gilbert Garcia, since 2018, and was  
well aware of the CS and Garcia’s affiliation with each other at the time.

27 <sup>7</sup> It should be noted that the CS’s contacts with Target Telephone 1 were not recorded or  
28 monitored prior to the commencement of his cooperation on July 9, 2022, but were confirmed by agents  
via toll analysis.



1 investigators the text messages history between him/her and Target Telephone 1, and they saw that the  
2 CS had received a text message from the Target Telephone 1 on July 7, 2022, which stated, “Aye  
3 whatever u can round up I need u to get it to my sister-in-law that way we can capitalize on her trip.”  
4 The CS explained to investigators that the substance of this text message pertained to Broski telling the  
5 CS that “his sister-in-law,”<sup>8</sup> later identified as Leticia Maddox was in Oahu and directing the CS to  
6 collect as much drug proceeds as possible to deliver them to his “sister-in-law”.

7 22. On July 7, 2022, after receiving the aforementioned text message from Target Telephone  
8 1, the CS received another text message from the user of Target Telephone 1, stating, “So I’d want u to  
9 drop it off tonight if u can or early tomorrow morning.” This and the preceding texts were verified by  
10 SA Gray by looking at the CS’s phone, as well as tolls. The CS advised investigators that the substance  
11 of this text message pertained to Broski telling the CS that he wished for the drug proceeds to be given  
12 to his sister-in-law that evening or the following morning. The CS stated that on July 8, 2022 he/she  
13 went to the Hilton Hawaii Village hotel located at 2003 Kalia Road in Honolulu, Hawaii and met  
14 Maddox, at the user of Target Telephone 1’s direction via phone call, and gave her approximately  
15 \$300,000 in drug proceeds as payment for approximately 100 pounds of methamphetamine that  
16 “Broski” had previously fronted and shipped to the CS.

17 23. Investigators were able to confirm through hotel video surveillance that the CS did in fact  
18 meet with Maddox at that time. Moreover, hotel records indicate that Maddox stayed at the hotel and  
19 provided the number (323) 358-8006 as her contact information. SA Gray also confirmed the CS’s  
20 contacts with the user of Target Telephone 1 through toll records and the texts contained in the CS’s  
21 phone. Investigators were able to further corroborate this with records from Hawaiian Airlines that  
22 show Maddox purchased a roundtrip ticket between Los Angeles International Airport (LAX) and  
23 Honolulu International Airport (HNL) on July 2, 2022. Maddox’s outbound flight departed on July 5,  
24 2022, and her inbound flight returned on July 8, 2022.

25 24. Based on my training and experience, knowledge of this investigation, and information

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26 <sup>8</sup> It does not appear that Maddox is in-fact **Thomas**’s sister-in-law. **Thomas** possibly referred to  
27 Maddox as his “sister-in-law” since she is the mother of Maeshack’s child. The investigation has also  
28 revealed that Maeshack is a fellow MSMC gang member and a potential source of drug supply for  
**Thomas**.

1 received from and conversations with experienced DEA agents and narcotics investigators, I know that  
2 it is common for more sophisticated DTOs to have money couriers retrieve drug proceeds to distance  
3 themselves from drug transactions. I know Broski and his DTO have used money couriers due to  
4 multiple reasons: (1) subsequent investigation and intercepted wire and electronic communications of  
5 **Thomas** has revealed the use of other money couriers to retrieve proceeds of drug transactions in  
6 Hawaii, Alabama, and California; (2) the information the CS relayed to SA Gray is consistent with my  
7 knowledge of how sophisticated DTOs operate; and (3) the above noted text message where the user of  
8 Target Telephone 1 stated, “[G]et it to my sister in law that way we can capitalize on her trip” indicates  
9 the “sister-in-law” was in Oahu temporarily and does not live there.

10 25. Furthermore, based on my training, experience, and knowledge of this investigation, I  
11 believe that Maddox’s trip to Hawaii is, in particular, not consistent with travel for personal pleasure.  
12 Factors consistent with the modus operandi employed by drug money couriers operating between  
13 Hawaii and California include (1) the fact that the airspace between California and Hawaii is a known  
14 drug corridor for the shipment of methamphetamine from the mainland in California to Hawaii.; (2)  
15 **Thomas** routinely fronted and shipped large quantities of methamphetamine to the CS; (3) the CS  
16 identified Maddox as the individual with whom the CS met with on July 8, 2022 to deliver a large sum  
17 of currency; (4) Maddox’s travel to Hawaii was brief and appeared to have been booked on short notice,  
18 consistent with operating at the direction of the leader of a drug trafficking organization; and (5)  
19 members of drug trafficking organizations often use trusted money couriers to receive and transport drug  
20 proceeds to distance themselves from drug transactions. Regarding the nature of Maddox’s travel to  
21 Hawaii, I know that it is common for money couriers to purchase airline tickets sometimes with little to  
22 no advance notice from their DTO leaders, as it is sometimes not clear when the money will be ready to  
23 be picked up. Maddox’s purchase of a round trip ticket between Los Angeles and Honolulu just three  
24 days prior to her departure date and the fact she only stayed three days in Hawaii before flying back to  
25 the mainland is consistent with retrieving drug proceeds from a drug customer.

26 1. **Thomas Orchestrated the Shipment of Approximately 64 Pounds of**  
27 **Methamphetamine on July 12, 2022.**

28 26. After the CS explained to DEA investigators how he/she would procure

1 methamphetamine from Broski and deliver proceeds to Broski as payment for the fronted drugs, he/she  
2 stated that the next shipment of methamphetamine was scheduled to arrive the following week (the week  
3 of July 12, 2022). The CS agreed to assist DEA investigators in attempting to seize the  
4 methamphetamine that Broski intended to deliver to Hawaii in two separate shipments. In preparation  
5 for these shipments, DEA investigators tasked the CS with renting two vacation rentals to use as  
6 locations for the receipt of the methamphetamine. After renting two vacation rentals, the CS sent text  
7 messages to the Target Telephone 1 on or near July 10, 2022, advising of the shipment addresses. On  
8 July 11, 2022, SA Gray directed the CS to place a recorded phone call to the user of Target Telephone 1,  
9 and SA Gray observed the CS dial the number for Target Telephone 1 to confirm whether the July 12,  
10 2022, shipment was still going to occur. The user of Target Telephone 1 was later identified as **Thomas**  
11 through voice comparisons of intercepted wire communications, discussed in more detail below, from  
12 Target Telephone 1. The following is a transcript of their conversation:

13 THOMAS: Yo.

14 CS: Broski.

15 THOMAS: Yo, what's the deal, bro?

16 CS: You got the new address, right?

17 THOMAS: Yeah.

18 CS: Okay, okay. Alright, so we good for tomorrow?

19 THOMAS: Yeah.

20 CS: Okay, alright. Later, bro.

21 THOMAS: Alright.

22 27. On July 12, 2022, investigators established surveillance at the two vacation rental  
23 locations that the CS had secured. That afternoon, investigators observed a Federal Express (FedEx)  
24 delivery vehicle arrive at both locations and drop off a large package at each. Investigators checked the  
25 label on each package and saw that they were addressed to the two vacation rental locations that the CS  
26 had provided to Thomas at Target Telephone 1. Within minutes of the packages being delivered to the  
27 vacation rental properties, the CS received a text message from Target Telephone 1, which was  
28 reviewed by SA Gray, that stated, "Bro they there." The return address was "3M CO – 20 BLDG 225-

1 1N, Saint Paul, MN 55144.” While the company, 3M, is located in Saint Paul, Minnesota, the return  
2 address label did not provide any information concerning its sender.

3 28. The CS placed a recorded phone call to Target Telephone 1 a short time later and SA  
4 Gray saw the CS dial the number for Target Telephone 1 and the call was recorded. **Thomas** answered  
5 and the CS asked if he wanted additional vacation rental properties to be rented, or if the two they were  
6 currently using would suffice. **Thomas** responded by saying those two locations were fine, and  
7 confirmed the recent delivery, stating, “that was 30, 30.” The CS explained to DEA investigators that  
8 “30, 30” referred to 30 pounds of methamphetamine being in each of the two packages that were  
9 delivered.

10 29. Investigators transported the packages to the DEA’s Honolulu District Office and  
11 obtained authorization to search them, pursuant to a federal search warrant (D. Hawaii Mag. No. 22-  
12 01210 RT). Upon searching the packages, investigators located one package weighing approximately  
13 28 pounds (gross weight) and another package contained approximately 32 pounds (gross weight) of a  
14 substance that a DEA chemist later found consisted of approximately 26.21 kilograms or 64 pounds (net  
15 weight) of methamphetamine and approximately 26 kilograms or 58 pounds of actual  
16 methamphetamine. The fact that the packages did not contain equal amounts of methamphetamine, as  
17 **Thomas** had indicated, suggests that **Thomas** was most likely not the one who packaged the drugs,  
18 which is consistent with one who occupies a leadership role within the organization.

19 **2. Thomas Negotiated for the Shipment of \$800,000 Worth of**  
20 **Methamphetamine.**

21 30. After the methamphetamine seizure on July 12, 2022, the CS and **Thomas** had multiple  
22 recorded phone calls that pertained to Thomas wishing to ship more methamphetamine to Hawaii. One  
23 of these calls took place on Saturday, July 16, 2022, during which time the CS called **Thomas** at Target  
24 Telephone 1 and told Thomas that he/she knew individuals that were visiting Hawaii from Guam that  
25 wished to procure \$800,000.00 worth of methamphetamine. Agents corroborated this call via toll  
26 records and confirmed that the voice was that of Thomas via a comparison with subsequent wire  
27 intercepts of **Thomas’s** phones.

28 THOMAS: Broski!

1 CS: Broski. Hey, so look, I've got some good news for you.

2 THOMAS: Okay! Talk to me. Tell me what's the news. What's going on?

3 CS: Alright, so, I just got off the phone with my boy from the people from Guam, and  
4 they is here.

5 THOMAS: Okay, okay.

6 CS: From what I am told, Broski, they have a lot of money.

7 THOMAS: Okay.

8 CS: A lot of money, so they asking for more than what I have, but what I'm going to  
9 do is, Monday, I'm going to meet up with them on Monday. I'm going to count  
10 the money with them.

11 THOMAS: Okay, Broski, this is what, this is what, I think you should do: you can tell them  
12 "Okay." but they're asking for more than what you have, but they need to first  
13 show you some, some good faith by purchasing what you have.

14 CS: No, yeah, so what. So what I'm . . .

15 THOMAS: Go ahead, go ahead.

16 CS: So what I'm going to do is cause they don't, so they don't want to grab from  
17 anyone else but me. You know what I mean?

18 THOMAS: You sure about that?

19 CS: I'm sure. I'm positive.

20 THOMAS: Cause last time they didn't do that.

21 CS: No, but I know, but remember I told you the conflict they had the last time.

22 THOMAS: [Mumbles in the affirmative.]

23 CS: And they didn't send old boy anymore. You know what I mean?

24 THOMAS: So it's a whole other person.

25 CS: Right. Now, the person I'm meeting, I'm going to meet up with them, so I'm  
26 going count the money that they have and make sure that they have, I don't know,  
27 from what, from what is said to me, they have more than what I have on hand.  
28 You know what I mean?

1 THOMAS: Okay.

2 CS: So, I'm going to go. I'm going to count it. I'm going to see for myself: the money.

3 Right? And then as soon as I get that frickin' hitting that, counting that money,

4 bro, I'm going to hit you.

5 THOMAS: Okay.

6 CS: Alright? I'm going to hit you, because, whatcha-ma-call-it, they want to hurry up

7 and get this done with me because everything got to ship out for them on

8 Saturday, you know what I mean?

9 THOMAS: Okay. Broski, I'm telling, this is what I want, what I want you to once you count

10 the bread, and know that they got the rest or whatever how ever more else they

11 need that's cool, but I also want them to not just show you the money tell them to

12 show good faith. Purchase what I have now, give me the money to for it, and once

13 you say, "Broski, I got it all in my hand." Then whatever else they want, they get

14 it. You feel what I'm saying? You know it don't take long to get there. It comes

15 right there, you know what I mean?

16 CS: Okay.

17 THOMAS: They got to show some good faith. Good faith to me, Broski, is not just counting

18 the money, cause you came with what you had last time, and they didn't get

19 nothing.

20 CS: Right, right. Okay... so, I'll get to purchase it, and as soon as they purchase it,

21 then what, you going to hit me?

22 THOMAS: Yeah, as soon as you tell me, "Hey, Broski, they bought it from me," it's on the

23 way.

24 31. Based on my training and experience, and knowledge of this investigation, I believe that

25 the CS and **Thomas** were discussing the particulars of a future drug transaction. The CS had explained

26 to SA Gray that, prior to him/her being arrested and electing to proactively cooperate with the

27 government, he/she had talked to **Thomas** about a large-scale methamphetamine transaction that was

28 supposed to involve individuals from Guam. The CS relayed to SA Gray that the deal with the

1 Guamanians never took place. During the foregoing call, the CS referenced the former incomplete  
2 Guamanian drug deal when he/she indicated “the people from Guam” were there and have “a lot of  
3 money,” in order to persuade **Thomas** that another large drug deal with them was still possible. When  
4 **Thomas** responded, “They’re asking for more than what you have, but they need to first show you  
5 some, some good faith by purchasing what you have,” I believe **Thomas** was saying the Guamanians  
6 needed to first purchase whatever methamphetamine is still in the CS’s possession before **Thomas**  
7 would send more. **Thomas**’s statements later in the conversation are consistent with **Thomas**’s  
8 directive to have the Guamanians first purchase the methamphetamine already in the CS’s possession.  
9 As **Thomas** stated, “I want you to once you count the bread, and know that they got the rest or whatever  
10 how ever more else they need that’s cool, but I also want them to not just show you the money tell them  
11 to show good faith. Purchase what I have now, give me the money to for it, and once you say, ‘Broski, I  
12 got it all in my hand,’ then whatever else they want, they get it.” Based on my training and experience  
13 and knowledge of this investigation, I know that “bread” is a slang term that drug traffickers use to  
14 reference money; therefore, **Thomas** was telling the CS that once the CS counts the money from the sale  
15 of the CS’s methamphetamine to the Guamanians, Thomas would send more methamphetamine.

16 32. Later during this same conversation, **Thomas** asked the CS how much methamphetamine  
17 the Guamanians wished to purchase. The following is a transcript from a portion of the CS and  
18 **Thomas**’s recorded phone conversation:

19 THOMAS: How many they saying they want?

20 CS: The people, who?

21 THOMAS: The Guam people.

22 CS: Okay, so from what I’m, so what I’m told they’re down here with over 800.

23 THOMAS: What?! And they trying to buy all windows?

24 CS: That’s what they want to do

25 33. Based on my training and experience, and from SA Gray’s conversation with the CS, the  
26 foregoing conversation indicates that the CS and **Thomas** were discussing the quantity of  
27 methamphetamine the people from Guam are interested in purchasing. When the CS stated “800,”  
28 he/she was referring to \$800,000 worth of methamphetamine. When **Thomas** questioned, “they trying

1 to buy all windows,” it is apparent that he was asking if the people from Guam wanted to purchase only  
2 methamphetamine, since “windows” is a common slang term for methamphetamine, which likely  
3 references the fact that crystal methamphetamine can be translucent, and windows have clear glass.

4 34. Later during this same conversation, **Thomas** talked to the CS about his source of supply  
5 and the amount of methamphetamine **Thomas** was able to procure from him or his associates. The  
6 following is a partial transcript of the CS and **Thomas’s** recorded phone conversation:

7 THOMAS: I just want to get my boy his bread, because this fool already hit me up  
8 [unintelligible] hey my people got 15, well they got 10,000 windows, they want  
9 to, they want to throw him 1,500.

10 CS: They got 10,000 windows?! Damn.

11 THOMAS: My boy’s people have 10,000 windows. They just, they just got they [sic]  
12 shipment in. So my boy’s people, they get 10,000 a month. So, he just got 10,000  
13 of them, so he told my boy [unintelligible] I got 1,500 for you, come grab ‘em. So  
14 my boy hits me and says, “can you handle 1,500?” I said, “well shit, well just wait  
15 up let me go ahead and square this deal away with you, and then you know then  
16 we’ll talk about it you know what I’m saying?” But my boy he got, he ready to  
17 give me 1,500.”

18 35. In the foregoing call, I believe, based on my training and experience and discussions with  
19 experienced DEA and narcotics investigators, the CS confirmed to SA Gray that, when **Thomas**  
20 indicated that his “boy’s people have 10,000 windows” and “get 10,000 a month,” he was referring to  
21 the fact that his source of supply and the source’s associates receive 10,000 pounds of methamphetamine  
22 each month. The CS further confirmed that, when **Thomas** said his “boy” asked “can you handle  
23 1,500,” his source of supply was indicating that he had 1,500 pounds of methamphetamine available to  
24 deliver to **Thomas**.

25 3. **Thomas Orchestrated the Shipment of Approximately 29 Pounds of**  
26 **Methamphetamine on July 19, 2022.**

27 36. On July 17, 2022, the CS rented two vacation rental properties and provided the  
28 addresses for them to **Thomas** via text message to Target Telephone 1. On July 18, 2022, during a



1 recorded phone call, which occurred over Target Telephone 1, Thomas stated he had shipped an  
2 additional package to Hawaii. Agents corroborated this call via toll records. It should also be noted that  
3 on July 18, 2022, SA Gray executed a search warrant (D. Hawaii Mag. No. 22-01205 RT) authorized by  
4 U.S. Magistrate Judge Rom A. Trader of the U.S. District Court for the District of Hawaii to obtain  
5 geolocation information for thirty days for Target Telephone 1. Subsequently obtained geolocation  
6 information through August 17 for Target Telephone 1 indicated that Target Telephone 1 was in the  
7 vicinity of Kern Valley State Prison in Delano within the State and Eastern District of California.<sup>9</sup>  
8 During the call, **Thomas** and the CS referred again to the Guamanian deal. The following is a partial  
9 transcript from the CS and **Thomas's** recorded phone conversation.

10 THOMAS: . . .and they got 500 they still want to spend?

11 CS: They 500 and twenty they still want to spend, Broski.

12 THOMAS: Alright, I'm going to put someone on a flight to you tonight. I already put those  
13 other ones out. You'll get them tomorrow, and then I'm going to load those other ones up with  
14 the ones I have at the crib right now.

15 37. Based on my training and experience and knowledge of this investigation, I believe the  
16 foregoing conversation indicates that **Thomas** was telling the CS that he had already shipped additional  
17 methamphetamine to him/her, which the CS would receive the next day.

18 38. On the morning of July 19, 2022, DEA investigators established surveillance at the two  
19 vacation rental properties in anticipation of the packages arriving later that day. That afternoon,  
20 investigators observed a FedEx delivery driver deliver a package to the door of one of the vacation  
21 rental locations which the CS had procured for the shipment. Investigators retrieved the package,  
22 transported it to the DEA's Honolulu District Office, and obtained authorization to search the package  
23 (D. Hawaii Mag. No. 22-1240 RT). Investigators searched the packages and located a total of  
24 approximately 13.52 kilograms or 29 pounds (net) of a substance that a DEA chemist tested and  
25 determined contained a mixture or substance containing a detectable quantity of methamphetamine and  
26

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27 <sup>9</sup> As Target Telephone 1 was located in a remote area in Delano, the radius of the geolocation  
28 information covered a broad area—approximately 1,000 meters or just over .6 miles—and encompassed  
the prison, as well as several residences and a warehouse.

1 consisted of approximately 12.1 kilograms or 27 pounds of actual methamphetamine.

2 **4. Thomas Represented that He Had Access to 1,500 Pounds of**  
3 **Methamphetamine.**

4 39. On July 20, 2022, the CS received a phone call from **Thomas** over (808) 284-8942,  
5 Target Telephone 1, which was recorded. Agents verified this call via toll records and confirmed that  
6 the caller was **Thomas** via comparisons with subsequent wire intercepts from **Thomas's** phones. The  
7 phone call, which was recorded, pertained to **Thomas** telling the CS about his conversation with his  
8 source of supply. The following is a partial transcript of that phone call:

9 THOMAS: So I'm going to send them all to you, bro, 1,500, but then I'm going to have my  
10 girl come out there and half of the 1,500 I'll have her take and put them in storage  
11 until you're done, in our storage unit, until you're done with the other half.

12 CS: Damn. Okay, okay.

13 THOMAS: He's asking me a time limit, bro. That fool say he got 10,000 windows, bro.

14 CS: Okay. 10.

15 THOMAS: He's got us ordering [*unintelligible*] fronting me 1,500. . . he ask me, real shit,  
16 bro, just he said, "I got 10,000, how many can you handle?" I said, "Well, I just  
17 take the initial 1,500," but, Broski, I probably could have told him to give me half  
18 of 'em. I don't know, bro, but I know this guy's the man! You know what I'm  
19 saying? This dude, he's the guy. You know what I mean?

20 CS: Right.

21 THOMAS: And you haven't got no complaints off the windows, huh?

22 CS: No complaints, Broski.

23 THOMAS: Yeah, cause I told him, I asked him, "They good, right?" And he said, "They're  
24 the same ones I gave you. They'll always be like that." And I said, "Well, my man  
25 hasn't told me that there was no problems, so you know what I mean? I know  
26 they're good. And they wasn't all shaky and shit, because we was breaking them  
27 down, you know?"

28 CS: Right, right. Right, okay.

1 THOMAS: But he's going to, I'm going to call him back this morning and I want to let him  
2 know, like, like a decent estimate, bro . . . when I'm going to pay him. How long  
3 it's going to take me to pay for 'em.

4 40. Based on my training and experience and knowledge of this investigation, I believe  
5 **Thomas** was telling the CS in the foregoing conversation that **Thomas's** source of supply wanted to  
6 give him "1,500," referencing 1,500 pounds of methamphetamine. Furthermore, **Thomas** explained  
7 how he would structure the delivery of the 1,500 pounds to the CS. **Thomas** stated he would give half  
8 to the CS and have a female associate place the other half into storage until the CS was ready for them.  
9 Additionally, when **Thomas** asked, "How many can you handle?" it is clear from the context of the call  
10 that he was asking how many pounds of methamphetamine the CS could sell.

11 41. On July 30, 2022, the CS received a phone call from **Thomas** over Target Telephone 1,  
12 which was recorded. Agents have confirmed via toll records that this call occurred and confirmed that  
13 **Thomas** was the caller through a voice comparison of subsequent intercepts of **Thomas's** phones.  
14 During the phone call, **Thomas** introduced CS to Antrell Maeshack Sr (Maeshack), **Thomas's**  
15 connection to the 1,500 pounds of methamphetamine. Phone records revealed that Maeshack used the  
16 phone number (714) 714-4176 in this three-way call. Pen register data showed that **Thomas** was on the  
17 phone with Maeshack at the time of the three-way call. The following is a partial transcript of that  
18 phone call:

19 THOMAS: Broski!

20 CS: Yo

21 THOMAS: I got my, I got my guy on the phone that, uh, remember I was sayin' that I got the  
22 shit from.

23 CS: Right.

24 THOMAS: So he's on the line so I was just gonna let you know that, uh, he's asking me  
25 again, like, when are we gonna have payment for him. I was tellin' him  
26 everything's cool bro , but, um, he said he wanted to hear it from you, bro. Know  
27 what I'm sayin'? So...shit, just go ahead and, uh...shit just holler at him....hey  
28 big bro! [speaking to third party].

1 MAESHACK: Yo.

2 THOMAS: He on the line.

3 CS: Bro everything good. We should be good in like a week.

4 MAESHACK: You said you should be good in like a week?

5 CS: Yeah. Yeah, we'll be good in a week, bro.

6 MAESHACK: Hey bro, uh...I'm tryna', uh...get these 1,500 for you [interrupted]

7 THOMAS: No, no, no bro, I'll already told him that. I told him we got the 15, but we just  
8 waiting to throw you a payment so we can mu'fuckin' grab 'em for you. I was  
9 just lettin' 'em know, you know, my boy's got 1,500 of 'em he tryin' to give us so  
10 we can do our thang wit' 'em but shit...I told him it's been over a month, so he  
11 askin' when we gonna get the bread, so, I said well you'll hear from him, know  
12 what I'm sayin'...you know, he sayin' it's green, I told him you were gonna have  
13 a buck 50 for him, so after you get the buck 50, know what I'm sayin', he still has  
14 shit in the streets or whatever the case may be, but then...maybe we can grab  
15 some from you or however many you want to give us [speaking to MAESHACK]  
16 out of the 1,500, or if you want to wait 'til you get everything, know what I'm  
17 sayin', but I just wanted to let you know once you get that shit, you know we can  
18 keep it rockin', you know.

19 CS: Right, cuz, yeah . . .we gonna be good in a week, man. I'll have that money in a  
20 week, um . . .people can come pick it up and . . . exactly what bro is sayin' to you,  
21 if you want the whole payment and wait 'til we're done with everything, that's  
22 fine . . . if you want to just keep it movin' that's cool too . . .

23 MAESHACK: Alright, bro I'm gonna give you a week, bro, feel me? Then . . . I can't keep 'em  
24 back here, they gotta go back across.

25 CS: Right, right, right. I feel you.

26 42. Based on my training and experience and discussions with experienced DEA agents and  
27 narcotics investigators, I believe during the foregoing conversation **Thomas** was introducing Maeshack,  
28 his connection to the 1,500 pounds of methamphetamine, as a way to confirm that the **Thomas** DTO did

1 in fact have 1,500 pounds of methamphetamine waiting to be distributed. In addition, **Thomas** was  
2 reminding the CS that the CS owed **Thomas** at least a “buck 50,” or \$150,000, from prior drug  
3 transactions, and both **Thomas** and Maeshack stated that they wanted payment within a week before  
4 they would be willing to transport any more methamphetamine to the CS in Hawaii.

5 **B. The DEA Bakersfield Wiretap Investigation Resulted in the Identification of**  
6 **Additional Co-Conspirators and Seizure of Over 54 Pounds of Methamphetamine and**  
7 **Fentanyl Smuggled into Thomas’s Prison.**

8 43. On August 11, 2022, U.S. District Judge Dale A. Drozd of the U.S. District Court for the  
9 Eastern District of California authorized the interception of wire communications of telephone number  
10 (808) 284-8942, Target Telephone 1, under Case Number 1:22-sw-0354-DAD. The interception of wire  
11 communications commenced the same day. Coincidentally, the phone number for Target Telephone 1  
12 changed to (323) 219-7115, Target Telephone 2, on the same day; however, the IMSI for the new  
13 number did not change. Because the Court had authorized the interception of wire communications for  
14 any changed number with the same IMSI, agents were able to monitor the communications over Target  
15 Telephone 1. Wire communications were monitored for approximately five days. During that time, it  
16 was determined that **Thomas**, the user of Target Telephone 2, was actually incarcerated at the Kern  
17 Valley State Prison for a first-degree murder conviction. During an intercepted call on August 13, 2022,  
18 **Thomas** identified his cellmate by his full name, Nathaniel Flowers, who is a Geer Gang Crip  
19 member.<sup>10</sup> Based on this information, DEA SA Devin Callahan contacted Lieutenant Ruben Molina of  
20 the Kern Valley State Prison and confirmed that **Thomas** was Nathaniel Flowers’ cellmate. In addition,  
21 during other intercepted calls, callers referred to **Thomas** as “Kris,” a shortened version of his first  
22 name, Kristopher.

23 44. Upon learning of **Thomas**’s custodial status, agents terminated the wire on August 16,  
24 2022, to ensure that appropriate protocols were in place to re-initiate the interception of wire, as well as  
25 electronic, communications of a cellular telephone utilized by a state prison inmate. DEA SA Gray and  
26 DEA Bakersfield case agents compared previously recorded telephone calls between the CS and  
27 **Thomas** with intercepted wire communications and determined that the voices are the same. Historical

28 <sup>10</sup> The Geer Gang Crips are a street gang located in the West Adams District of South Los Angeles.

1 cell site information for the phone number that Broski provided to the CS indicates that the phone was  
2 activated in May 2022 and has been located since May 2022 in Delano, California in the Eastern District  
3 of California.

4 **C. Mitchell Was Identified as a Member of the Thomas DTO.**

5 45. On August 15, 2022, at 3:08 p.m., **Thomas** received a brief call on Target Telephone 2  
6 from telephone number (562) 203-9474, which was subscribed to by **Justin Mitchell** and identified as  
7 the phone number used by **Justin Mitchell**. The following is a transcript of the contents of the call:

8 THOMAS: Yo.

9 MITCHELL: Yo. So you want them done today?

10 THOMAS: Yes, bro... time's up.

11 MITCHELL: ...or do you... alright bet..[interrupted]

12 THOMAS: Do them today. Not after 4:30.

13 MITCHELL: That's what I was saying.

14 THOMAS: That's an hour n' thirty minutes bro they can at least do one or something.

15 MITCHELL: That's what I was telling her, we can get one done today. But we probably  
16 aren't gonna be able to get . . . [call ended].

17 46. During this call, **Mitchell** asked **Thomas**, "So you want them done today?" **Thomas**  
18 replied, "time's up," and told **Mitchell** he needed to do them that day before 4:30 pm. Based on my  
19 training, experience, and discussions with experienced DEA agents and narcotics investigators, I believe  
20 that **Mitchell** was referring to money that he owed to **Thomas**, and **Thomas** was acknowledging while  
21 telling **Mitchell** he needed to pay that day. Subsequent calls suggested that the monies **Mitchell** owed  
22 **Thomas** represented drug debts or proceeds from drug sales.

23 47. At 3:22 p.m., **Thomas** received a call on Target Telephone 2 from Maeshack, using (714)  
24 714-4176. During this call, Maeshack said that a third party was 5 minutes away. **Thomas** responded  
25 by saying a fourth party was also 5 minutes away. Maeshack then described an assortment of money  
26 expected to be delivered, totaling approximately \$28,000 in cash and money orders. At 3:37 p.m.,  
27 **Thomas** received a call from Maeshack, who explained to **Thomas** that the third party would be short  
28 on the money.

1 48. At 3:40 pm, **Thomas** received a call on Target Telephone 2 from Maeshack, using (714)  
2 714-4176. A transcribed excerpt of that call indicates they discussed methamphetamine and prices, as  
3 follows:

4 MAESHACK: . . .he out here selling, they keeping coming down to TJ week for the 125, bruh,  
5 they got that shit going bonkers, cuh . . .

6 THOMAS: Yeah I asked the nigga how much a “P” for he gonna tell us 1,800... I’m saying,  
7 bruh, I said there ain’t no way you buyin ‘em for 1,800 and selling them for 125  
8 for the zip. You think we believe that?

9 MAESHACK: It’s been like that. So he prob buyin ‘em for 1,200 you feel me?

10 THOMAS: He going bonkers though he got all you niggas buyin it so . . .

11 MAESHACK: You can’t beat it, you feel me? You can’t beat it. 125 for an ounce? Shit, I sell  
12 that mu’fucker for 250 my niggas. Smoke for free.

13 49. Based on my training, experience, and discussions with experienced DEA agents and  
14 narcotics investigators, I believe the foregoing conversation indicates that **Thomas** and Maeshack were  
15 discussing the prices of methamphetamine being sold by a third party. When they mentioned the price  
16 of a ‘P’ being “1,800,” I believe they were referring to a pound of methamphetamine costing \$1,800,  
17 which is within the average range of prices for methamphetamine in the Los Angeles area at that time.  
18 Maeshack then indicated that selling an ounce of methamphetamine for \$125 is good, because he can  
19 then sell that ounce for \$250.

20 50. Later in the same call, **Thomas** can be heard talking to someone else (possibly on a  
21 different phone) giving them directions for how to count the money, as indicated by the following  
22 transcribed excerpts:

23 THOMAS: She said one was supposed to be vacuum sealed, right?

24 MAESHACK: Two vacuum sealed, one says 10, one says 15 on it.

25 THOMAS: [speaking to third party] Scrap, one say 10, one say 15, and then, and then the  
26 other shit is loose money with the money orders. [now speaking to Maeshack]  
27 Alright, so you want Scrap to leave it like that?

28 MAESHACK: Nah she can open it and count it cuz it gonna have to get opened up anyways.

1 THOMAS: [speaking to third party] yeah all the rubber bands gotta come off.

2 MAESHACK: Just tell her to count it separately, don't mix the bags. It is what it is.

3 THOMAS: [speaking to third party] tell Scrap to count it separately so when she county the  
4 10, count the 15, keep it separate.

5 MAESHACK: When it all adds up to 35, then she can put it together.

6 THOMAS: [speaking to third party] Then when you count the 10 and the 15 and it all adds up  
7 to what it's supposed to be, then put it together. But if its not, you tell us which  
8 aint what it is, you hear me?

9 51. Based on my training, experience, and discussions with experienced DEA agents and  
10 narcotics investigators, I believe that in the foregoing conversation Maeshack and **Thomas** were  
11 instructing an unknown female money courier, possibly on a separate telephone call with **Thomas**, how  
12 to handle the money once she receives it, as indicated in the next paragraph. **Thomas** was telling the  
13 money courier to expect two vacuum sealed bags, one labeled 15 (for \$15,000) and one labeled 10 (for  
14 \$10,000), and to also expect loose money, along with money orders. **Thomas** then instructed the money  
15 courier to count the money separately to make sure each has the correct amount, equaling 35 (or  
16 \$35,000) total. Subsequent intercepted calls suggest that **Mitchell** was the individual who was going to  
17 provide the money to **Thomas's** courier.

18 52. Later in the same call, there was additional discussion about money, as indicated by the  
19 following transcribed excerpt:

20 MAESHACK: Justin just texted me saying he waitin' on you.

21 THOMAS: Man tell him it's not gonna happen bro. He knows it's not gonna happen  
22 bro. It's 30 minutes for that. It ain't gonna happen, cuh. Ain't finna be  
23 tryin' to rush shit. Like nah, bro. I already told your man he had an hour  
24 and 30 minutes I thought they been was there like 4 o'clock I thought they  
25 was already, I mean 3 o'clock I thought they was driving already been  
26 gone . . .

27 53. Based on my training, experience, and discussions with experienced DEA agents and  
28 narcotics investigators, I believe that in the foregoing conversation **Thomas** and Maeshack were



1 referring to **Mitchell** being late to deliver money. During the previously mentioned call at 3:08 p.m. on  
2 this same day, **Thomas** told **Mitchell** he had an hour and 30 minutes to “get one done today.” This time  
3 frame was reiterated in this telephone call with Maeshack. In addition, I believe Maeshack’s reference  
4 to “Justin” is likely a reference to **Justin Mitchell**.

5 54. At 4:11 p.m., **Thomas** placed an outgoing call using Target Telephone 2 to Maeshack.  
6 During this conversation, which was possibly a three-way call including **Mitchell**, there was a lengthy  
7 argument over how much money **Mitchell** had delivered to the female courier.

8 55. Based on my training, experience, and discussions with experienced DEA agents and  
9 narcotics investigators, I believe the foregoing calls indicate that **Mitchell** likely owed drug proceeds to  
10 **Thomas**, who indicated that “the time is up” and therefore **Mitchell** needed to pay his debt that day.  
11 **Thomas** sent a female money courier to receive \$35,000 from **Mitchell**. Based on the aforementioned  
12 three-way call with **Thomas**, Maeshack, and **Mitchell**, it appears that the money was in fact delivered,  
13 but was short.

14 **D. Bailey and Charles Were Also Identified as Thomas’s Co-Conspirators After**  
15 **Smuggling Fentanyl into Kern Valley State Prison.**

16 56. The interception of wire and electronic communications from Target Telephone 2 was  
17 again authorized on September 2, 2022, by U.S. District Judge Jennifer L. Thurston under Case Number  
18 1:22-SW-00386-JLT.

19 57. On September 8, 2022, at 7:55 p.m., **Thomas**, using Target Telephone 2, made an  
20 outgoing call to **Mitchell** at telephone number 562-203-9474. During this call, **Thomas** told **Mitchell**  
21 that he needed **Mitchell** to go to the same place he had gone to “last time.” **Mitchell** asked **Thomas** if  
22 he meant Bakersfield and **Thomas** confirmed. **Thomas** told **Mitchell** to start heading toward  
23 Bakersfield to “drop it off.”

24 58. At 9:15 p.m., **Thomas** received a text message on Target Telephone 2 from telephone  
25 number 323-371-5165 (subscribed to by Anthony Grey, 7314 Mace Place, Los Angeles, California),  
26 identified as USER5165 and believed to be used by **Thomas**’s cellmate, Flowers. The text message  
27 contained the following address: 3901 Q Street, Bakersfield, CA. At 9:19 p.m., **Thomas** sent the same  
28 address via text message to **Mitchell**, followed by, “Thts where ur gonna take it to.”

1           59.     At 9:49 p.m., **Thomas** made an outgoing call on Target Telephone 2 to telephone number  
2 714-714-4176 (subscribed to by James Jones, 1705 W. 130th Street., Gardena, California), used by  
3 Maeshack. During the call, **Thomas** and Maeshack discussed the process of wrapping a narcotics  
4 package in electrical tape and Saran wrap before a female uses her vagina to smuggle the package to an  
5 inmate inside a prison.

6           60.     At 10:25 p.m., **Thomas**, using Target Telephone 2, received a text message from 323-  
7 371-5165, the phone number associated with Flowers. The text message contained the following  
8 address: 5037 E Brundage Lane, Bakersfield, CA, which is the address for a Neighborhood Walmart  
9 store. At the same time, **Thomas** sent the same address to **Mitchell**. At 10:28 p.m., **Thomas** sent a  
10 picture message to Flowers, which appeared to depict two small packages wrapped in black electrical  
11 tape on a table. At 10:37 a.m., **Thomas** sent **Mitchell** a text asking, “whats yo eta?” **Mitchell** replied  
12 with the text messages “2hr 30” and “1am.”

13           61.     At 10:41 p.m., **Thomas**, using Target Telephone 2, sent a text message to **Mitchell**  
14 stating, “Ima send u his number so if I’m sleep u can call him.” At 10:42 p.m., **Thomas**, using Target  
15 Telephone 2, made an outgoing phone call to telephone number 661-910-6954 (subscribed to Michael  
16 John, 4502 Saturn Street, Los Angeles, California), used by an unidentified male referenced as UM6954.  
17 During this call, **Thomas** asked UM6954 if he was going to be awake. UM6954 said that he “didn’t  
18 have a choice.” **Thomas** told UM6954 that he gave “him,” referring to **Mitchell**, his number to call once  
19 he gets out there, referring to Bakersfield. **Thomas** told UM6954 that he, referring to **Mitchell**, had 2  
20 bundles and 2,000.

21           62.     At 10:46 p.m., the phone number associated with Flowers sent a text message to  
22 **Thomas**, using Target Telephone 2, which stated, “75 gs in each 1.”

23           63.     At 11:30 p.m., agents and officers of the DEA Bakersfield Resident Office established  
24 surveillance at Neighborhood Walmart, 5037 E. Brundage Lane, Bakersfield, California.

25           64.     On September 9, 2022, at 12:48 a.m., **Thomas**, using Target Telephone 2, sent a text  
26 message to **Mitchell** asking, “How far out are u?” At 12:49 p.m., **Mitchell** sent a text message to  
27 **Thomas** stating, “20 minutes.”

28           65.     At 1:10 a.m., DEA SA Devin Callahan observed a black Kia SUV bearing CA license

1 plate # 8LRE842 (registered to Amanda L. Phillips and **Justin D. Mitchell**, 10411 S. Van Ness Ave.  
2 Apt. B, Inglewood, CA) drive into the parking lot of the Neighborhood Walmart. SA Callahan observed  
3 the Kia SUV drive towards the south end of the parking lot, where SA Callahan saw that the driver of  
4 the vehicle was **Mitchell** based on a comparison with a picture from the California Department of Motor  
5 Vehicles (DMV) for **Justin Damonte Mitchell**. SA Callahan then saw the Kia SUV drive towards the  
6 north side of the Neighborhood Walmart, where it eventually parked.

7 66. At 1:12 a.m., **Thomas**, using Target Telephone 2, received a text message from **Mitchell**  
8 stating, "I'm here." **Thomas** then sent a text message to UM6954 stating, "He's there." At 1:13 a.m.,  
9 **Thomas** sent a text message to **Mitchell** stating, "Call him."

10 67. At 1:19 a.m., DEA SA Sasha Engle observed a white Chevrolet sedan bearing California  
11 license plate # 5Y GK604 (registered to Lydia Stephens, P.O. Box 42991, Bakersfield, California) enter  
12 the parking lot of the Neighborhood Walmart. SA Engle determined that the driver of the white sedan  
13 was possibly an African American female. SA Engle observed the white Chevrolet drive toward the  
14 black SUV and proceed to park in the stall directly east of it. SA Engle observed a door open from the  
15 black SUV, but was unable to determine who exited the vehicle. Shortly thereafter, both vehicles exited  
16 the parking lot.

17 68. At 1:31 a.m., **Thomas**, using Target Telephone 2, received a text message from **Mitchell**  
18 stating, "I did she got everything." **Thomas** then responded to **Mitchell**, "Good looking."

19 69. At 8:00 a.m., SA Callahan contacted Lieutenant Molina of the Kern Valley State Prison  
20 to inform him of a possible delivery of controlled substances to someone within the person who is  
21 associated with **Thomas**.

22 70. At 12:53 p.m., an officer of the Kern Valley State Prison spotted a white Chevrolet sedan  
23 in the visitor's parking lot of the prison. Lieutenant Molina was able to determine that the driver of the  
24 white Chevrolet was **Natasha Bailey**, who presented her identification to prison security to visit  
25 **Derrick D. Charles**, a Westside Bakersfield Crip gang member who then occupied a cell near **Thomas**.  
26 **Bailey** is an African American female, who has a 2005 conviction for possession of marijuana. Once  
27 **Bailey**'s visit with **Charles** concluded, she returned to the white Chevrolet and left the premises.

28 71. At 2:00 p.m., officers searched **Charles**' prison cell and found and seized two packages

1 that were wrapped in black electrical tape. The packages were located under the lower-bunk mattress  
2 that was assigned to **Charles** at the time of the seizure. The packages were consistent in appearance to  
3 the packages depicted in the photo that **Thomas** had texted Flowers. On September 13, 2022, DEA  
4 Task Force Officers retrieved the seized packages from Kern Valley State Prison. A DEA chemist  
5 found that the packages contained 255.4 grams (net) of fentanyl, a Schedule II controlled substance.

6 **E. Basis to Search Bailey’s Residence, the SUBJECT PREMISES.**

7 72. According to an open-source query of Experian, as well as through law enforcement  
8 databases, **Bailey** has resided at **502 Isla Bonita Street, Bakersfield, California 93307**, the **SUBJECT**  
9 **PREMISES**, since approximately 2022. Pacific Gas & Electric records indicate that the account holder  
10 for the **SUBJECT PREMISES** is “NATASHA BAILEY” at “502 ISLA BONITA ST,  
11 BAKERSFIELD, CA 933076860026.” On October 2, 2023, DEA SA Blake McEntire observed **Bailey**  
12 arrive at the **SUBJECT PREMISES** in the same white Chevrolet sedan bearing California license plate  
13 # 5YGG604 that was observed during the September 9, 2022, narcotics transaction between **Bailey** and  
14 **Mitchell**. SA McEntire saw **Bailey** exit the vehicle and walk into the front door of the **SUBJECT**  
15 **PREMISES**. On February 5, 2024, DEA SA Brad Bartram saw **Bailey** depart from the **SUBJECT**  
16 **PREMISES** in the same white Chevrolet sedan.

17 73. Notwithstanding the fact that it has been nearly seventeen months from the seizure of the  
18 smuggled fentanyl discussed above, based on my experience and review of *United States v. Greany*, 929  
19 F.2d 523 (9th Cir. 1991), where there is a long-term or ongoing legal income or criminal business or  
20 where the evidence is of a nature that would be kept long after the criminal activity has ceased, *e.g.*,  
21 financial records, the passage of long periods of time, including, as in *Greany*, two years, will not make  
22 the evidence supporting the issuance of a warrant stale. Further, while probable cause that a resident of  
23 a location has committed a crime is in itself insufficient to satisfy the standard, it is well-established that  
24 “[i]n the case of drug dealers, evidence is likely to be found where the dealers live.” *United States v.*  
25 *Angulo-Lopez*, 791 F.2d 1394, 1399 (9th Cir. 1986), quoted in *United States v. Gil*, 58 F.3d 1414, 1419  
26 (9th Cir. 1995); *United States v. Pitts*, 6 F.3d 1366, 1369 (9th Cir. 1993); *United States v. Terry*, 911  
27 F.2d 272, 275 (9th Cir. 1990). Such evidence includes digital devices, including cell phones, which  
28 were used to facilitate drug transaction. Moreover, when the drug traffickers consist of a ringleader and

1 assistants, the Ninth Circuit has found “a fair probability exists that drugs will be present at the  
2 assistants’ residence as well as the ringleader’s.” *Angulo-Lopez* at 1399.

3 74. The evidence indicates that **Bailey** met with **Mitchell**, a member of **Thomas**’s DTO, at a  
4 parking lot in Bakersfield to retrieve fentanyl and approximately 14 hours later smuggled the drug into  
5 **Thomas**’s prison. In that capacity, she served as an assistant for **Thomas**, the ringleader.

6 **F. Thomas and Mitchell Participated in the Shipment of Approximately 55 Pounds of**  
7 **Methamphetamine to Oklahoma and Alabama.**

8 75. On September 22, 2022, **Mitchell**, using telephone number (562) 203-9474, texted  
9 **Thomas** on Target Telephone 2 with three different 12-digit numbers. The following is a transcript of  
10 the text messages between **Thomas** and **Mitchell**.

11 THOMAS: Send me the numbers

12 THOMAS Not the receipt jus the numbers

13 MITCHELL: 278304399662

14 MITCHELL: 278304378410

15 MITCHELL: 278303230226

16 MITCHELL: That’s all 3

17 76. After further analysis, two of these numbers were determined to be Federal Express  
18 (FedEx) tracking numbers. The third number was intended to be a tracking number as well, but the  
19 number was incorrectly texted by **Mitchell** to **Thomas**, as further explained below. Based on the FedEx  
20 tracking data, FedEx determined that one of these packages was destined for Mustang, Oklahoma, while  
21 the other was destined for Opelika, Alabama.

22 77. That same evening, DEA SA Sasha Engle contacted DEA offices in Oklahoma City,  
23 Oklahoma, and Montgomery, Alabama, to alert them of the incoming FedEx packages. On September  
24 23, 2022, the aforementioned packages were both seized by DEA agents at their respective FedEx  
25 facilities prior to being delivered to Mustang, Oklahoma and Opelika, Alabama.

26 78. The package seized that was bound for Opelika, Alabama was opened by FedEx  
27 personnel—not at the direction of law enforcement officers—based on the suspicion that the package  
28 contained controlled substances. A DEA chemist tested the package contents and found it contained

1 approximately 15.37 kilograms or 33 pounds (net) of a mixture or substance containing a detectable  
2 amount of methamphetamine and 13.21 kilograms or 29 pounds of actual methamphetamine.

3 79. The package seized that was bound for Mustang, Oklahoma was opened pursuant to a  
4 search warrant. A DEA chemist tested contents and confirmed that it contained approximately 9.8  
5 kilograms or 22 pounds (net) of a mixture or substance containing a detectable amount of  
6 methamphetamine and 8.6 kilograms or 19 pounds of actual methamphetamine.

7 80. On this same morning, text messages were intercepted between **Thomas** and **Mitchell**.  
8 The following is an accurate transcript of those text messages:

9 THOMAS: That second number aint rite [sic].

10 MITCHELL: 278305378410

11 MITCHELL: My fault

12 81. This new number was determined to be a FedEx tracking number intended for delivery to  
13 432 South Avenue, Bridgeton, New Jersey. By the time agents intercepted this text, the package had  
14 already been delivered.

15 **G. Thomas Was Involved in the Shipment of Fentanyl from Texas to Los Angeles.**

16 82. On December 5, 2022, U.S. District Judge Jennifer L. Thurston of the Eastern District of  
17 California authorized under Case Number 1:22-sw-0493-JLT, the interception of wire and electronic  
18 communications over telephone number (323) 573-0066, Target Telephone 3, which was changed to  
19 (410) 463-8887, Target Telephone 5, on December 10, 2022. However, the IMSI for the new number  
20 did not change. Because the Court had authorized the interception of wire and electronic  
21 communications for any changed number with the same IMSI, agents were able to monitor for thirty  
22 days the communications over Target Telephone 5.<sup>11</sup> Pursuant to the court-authorization, on December  
23 13, 2022, agents of the DEA Bakersfield Resident Office intercepted call #1083, an incoming text  
24 message between **Thomas** at Target Telephone 5 and telephone number (323) 793-7508, which has  
25 been identified as the phone used by Thomas's cellmate, Nathaniel Flowers. The text consisted of a  
26 photograph of a picture of pink and yellow pills in two different clear plastic bags.

27 \_\_\_\_\_  
28 <sup>11</sup> Each of the orders authorizing the interception of wire and electronic communications in this case authorized monitoring for a 30-day period.

1 83. On December 17, 2022, agents of the DEA Bakersfield Resident Office intercepted call #  
2 2100, an incoming text message to **Thomas** at Target Telephone 5 from Flowers, which contained a  
3 photograph of a tracking number “1Z6V4A994433797466” for a 20-pound parcel indicating a Saturday  
4 delivery.

5 84. Shortly after intercepting the photograph of the tracking number as referenced in call #  
6 2100, DEA SA Brad Bartram entered the tracking number into the UPS website and observed that the  
7 parcel had been shipped on December 16, 2022 from Conroe, Texas, with an arrival date of December  
8 17, 2022 at a UPS Facility in Los Angeles, California. At 9:30 a.m., SA Bartram spoke with UPS  
9 Business Manager, Matt Rogers, who indicated that the parcel had been shipped from the UPS store at  
10 206A S. Loop 336 W, Conroe, Texas 77304 to “Mr Harbin, 222 W 104<sup>th</sup> St, Los Angeles, Ca  
11 900034554.” At 9:40 a.m., SA Engle contacted DEA Task Force Officer Michael Mitchell at the Los  
12 Angeles Field Division, who was able to locate and secure the parcel pending a search warrant.

13 85. On December 19, 2022, DEA SA Sasha Engle spoke with TFO Michael Mitchell and was  
14 advised that a drug-detecting canine did not alert on the 20-pound parcel. At 10:30 a.m., TFO Mitchell  
15 executed a state search warrant on the parcel which revealed 12 bottles of suspected promethazine cough  
16 syrup, along with two clear plastic baggies containing yellow bar-shaped pills suspected to be  
17 Alprazolam and 50 oval-shaped pink pills. These drug exhibits were processed and sent to a state  
18 laboratory for testing. The lab, which did not test for schedule III or IV controlled substances, did not  
19 detect any controlled substance in the 12 bottles of suspected promethazine syrup or the yellow bar-  
20 shaped pills. Promethazine is not a controlled substance but, according to DEA agents, promethazine is  
21 commonly abused by mixing it with codeine and Sprite or alcohol to create a drink known on the street  
22 as the “purple drank,” which produces a euphoric effect. It is highly addictive and can be lethal.  
23 Alprazolam, sold under the brand name Xanax, is a schedule IV controlled substance. It is extremely  
24 addictive and often abused. A DEA chemist found the oval-shaped pink pills contained approximately  
25 6.99 grams of fentanyl, a Schedule II controlled substance.

26 86. On December 28, 2022, at 7:30 a.m., TFO Mitchell conducted drive-by surveillance at  
27 222 W. 104th Street, Los Angeles, California, the destination of the package containing fentanyl, syrup  
28 and yellow pills, and observed a 2018 black Dodge sedan bearing California license plate 8EWJ352

1 parked in front of the residence. DMV records indicate that the registered owner of the vehicle was  
2 Antrell Maeshack at 225 W Colden Avenue, Apt. 101, Los Angeles, California 90003. As indicated  
3 above, Maeshack is a suspected drug connection for **Thomas**.

4 **H. Thomas Sought 100 Pounds of Crystal Methamphetamine, 50,000 Fentanyl Pills,  
5 and a Stash Car for Smuggling Drugs into the United States.**

6 87. On December 28, 2022, agents from the Bakersfield Resident Office intercepted a series  
7 of outgoing picture messages (Call #'s 3595, 3596, 3600, 3601, 3602, and 3612) from **Thomas** at Target  
8 Telephone 5 to his cellmate, Flowers. These pictures showed different angles of a black SUV and a VIN  
9 number, displaying "JN8AS5MT9DW002837." In the pictures, there were no other identifiers displayed  
10 on the vehicle, such as a license plate. Near the vehicle, there appeared to be a pillar displaying "Floor  
11 3".

12 88. Using a commercial law enforcement database, agents were able to determine that this  
13 VIN number comes back to a 2013 black Nissan Rogue SUV, but no registration information was  
14 available.

15 89. On December 22, 2022, SA Bartram conducted surveillance at an apartment complex at  
16 21601 Avalon Boulevard in Carson, California, which, based on intercepted calls, is believed to have  
17 served as a stash location for drugs and/or drug proceeds for the **Thomas** DTO. During this  
18 surveillance, SA Bartram recorded a video within the parking garage to help identify any potential  
19 vehicles used by co-conspirators within the **Thomas** DTO. The video shows a black Nissan Rogue  
20 SUV with no license plate on the third floor of the garage of the apartment complex with a pillar that is  
21 similar to the one in the picture sent from **Thomas** to Flowers, referenced above.

22 90. That same day at 10:43 p.m., DEA agents from the Bakersfield Resident Office  
23 intercepted call #3612, an outgoing text message from **Thomas** at Target Telephone 5 to Flowers,  
24 stating "We want ah hunnid windows and 50k blues." As discussed above, I know that the term  
25 "window" is a common code word for crystal methamphetamine. Based on my training, experience, and  
26 discussion with experienced DEA agents and narcotics investigators, I know that the term "blues" is a  
27 common code word for counterfeit oxycodone pills containing fentanyl. Thus, I believe the text  
28 indicates that **Thomas** was interested in obtaining 100 pounds of crystal methamphetamine and 50,000



1 fentanyl pills.

2 91. On December 29, 2022, agents of the Bakersfield Resident Office intercepted call #3640,  
3 an outgoing voice call from **Thomas** at Target Telephone 5 to Koeppel Hall, a member of the Menlo  
4 Crips and an inmate at Folsom State Prison.<sup>12</sup> During the conversation, **Thomas** said the “Mexicans”  
5 had asked **Thomas** for a stash car. Based on my training, experience, and discussions with experienced  
6 DEA agents and narcotics investigators, I believe that a stash car is a vehicle outfitted with secret  
7 compartments that smugglers use to hide narcotics, weapons, money, and more. **Thomas** told Hall that  
8 he told the Mexicans that he had a car with a stash that could hold 250 bricks and about \$2,000,000  
9 cash. **Thomas** then told Hall to let the Mexicans know that they could use it, but they would have to  
10 “register it to their people.” **Thomas** then explained to Hall that he would be able to get the “windows  
11 for two seventy-seven and the blues for twenty.” Based on my training, experience, and discussions with  
12 experienced DEA agents and narcotics investigators, I believe that the **Thomas** DTO was utilizing the  
13 aforementioned Nissan Rogue as a stash car, and that **Thomas** intended to let the Mexicans use it in  
14 exchange for getting a better price for methamphetamine (at \$277 per pound) and counterfeit oxycodone  
15 pills containing fentanyl (at twenty cents per pill).

16 92. Furthermore, I believe that **Thomas** was working in concert with his cellmate to facilitate  
17 a large purchase of narcotics from a Mexican source of supply that Hall was in communication with.

18  
19 **VI. CONCLUSION**

20 93. Based on the foregoing, I submit that there is probable cause to believe that **Kristopher**  
21 **Thomas** distributed at least 500 grams of a mixture or substance containing methamphetamine and at  
22 least 50 grams of methamphetamine, a schedule II controlled substance, in violation of 21 U.S.C. §  
23 841(a)(1) and 841(b)(1)(A); **Thomas** and **Justin Mitchell** conspired to distribute and possess with intent  
24 to distribute at least 500 grams of a mixture or substance containing a detectable amount of  
25 methamphetamine and at least 50 grams of methamphetamine, a schedule II controlled substance, in  
26 violation of 21 U.S.C. §§ 846 and 841(b)(1)(A); **Thomas, Mitchell, Natasha Bailey, and Derick**

27  
28 <sup>12</sup> The Menlo Crips are a street gang located on the west side of Los Angeles.

1 **Charles** conspired to distribute and possess with intent to distribute at least 40 grams of a mixture or  
2 substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]  
3 propanamide, commonly known as “fentanyl,” a schedule II controlled substance, in violation of 21  
4 U.S.C. §§ 846 , 841(a)(1), and 841(b)(1)(B).

5 94. It is therefore respectfully requested that the Court make such finding and issue warrants  
6 for their arrests.

7 95. Based on the foregoing, I further request that the Court issue the proposed search warrant  
8 for the **SUBJECT PREMISES**, pursuant to Federal Rule of Criminal Procedure 41.

9 **VII. REQUEST TO SEAL**

10 96. I further request that the Court seal all papers submitted in connection with this Affidavit,  
11 except that copies may be maintained by the U.S. Attorney’s Office and may be served on counsel for  
12 the defendants, Special Agents and other law enforcement officers and federally deputized state and  
13 local law enforcement officers, and other government and contract personnel acting under the  
14 supervision of such law enforcement officers, as needed. These documents pertain to an ongoing  
15 criminal investigation that is neither public nor known to all of the targets of this investigation.  
16 Accordingly, there is good cause to seal these documents because their premature disclosure may  
17 seriously jeopardize this investigation, and better ensure the safety of agents and the general public at  
18 the time the search and arrest warrants are executed.

19  
20   
21 NICHOLAS B. STIRLING  
Special Agent, Drug Enforcement Administration

22 Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by  
23 telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this 14th day of February 2024.

24   
25 HONORABLE CHRISTOPHER D. BAKER  
UNITED STATES MAGISTRATE JUDGE

26 *Reviewed as to form.*

27 /s/ Karen A. Escobar  
28 KAREN A. ESCOBAR  
Assistant U.S. Attorney