

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM NOBLES,  
JARON NABORS, and  
ERICKA PRUITTE

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**

From on or about November 10, 2017, and continuing until on or about February 28, 2018, at Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere, WILLIAM NOBLES and JARON NABORS, defendants herein, did knowingly conspire with each other, and with others known and unknown, to possess with intent to distribute and distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

**Count Two**

From on or about February 2, 2018, and continuing until on or about February 28, 2018, at Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere, ERICKA PRUITTE, defendant herein, did knowingly conspire with others known and unknown to possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

\_\_\_\_\_  
BRIAN PROCHASKA  
Task Force Officer, Federal Bureau of  
Investigation (FBI)

Sworn to before me and signed in my presence.

Date: August 9, 2018

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

\_\_\_\_\_  
MARIA VALDEZ, U.S. Magistrate Judge  
*Printed name and Title*

**AFFIDAVIT**

I, BRIAN D. PROCHASKA, being duly sworn, state as follows:

**I. INTRODUCTION**

1. I am a Task Force Officer with the Federal Bureau of Investigation (“FBI”) and have been so employed since approximately January 2014. I am currently assigned to the FBI’s South Resident Agency, and my responsibilities include the investigation of violent crimes and narcotics trafficking offenses. I have been employed by the Joliet Police Department for the past 18 years, with over 14 years of experience investigating gang, firearms, and narcotics offenses.

2. I have received specialized training in drug investigations while employed as a Joliet Police Officer and a FBI Task Force Officer. I am familiar with and have participated in all of the normal methods of investigations, including but not limited to undercover purchases of narcotics, visual surveillance, general questioning of witnesses, informant and cooperating witness debriefings, pen registers, document analysis, and utilization of undercover agents/officers. I have been personally involved in investigations of drug-related offenses involving the possession, sale, and distribution of cocaine, heroin, and crack cocaine in the south suburbs of the Chicago metropolitan area, and investigations involving the distribution of these substances by members of street gangs in the south suburbs of the Chicago metropolitan area.

3. I have also received specialized training in the enforcement of federal narcotics laws, and have been involved in numerous aspects of narcotics trafficking investigations, including: (a) the debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the distribution and transportation of controlled substances, and of the laundering and concealing of proceeds from drug trafficking; (b) surveillance; (c) analysis of documentary and physical evidence; and (d) participating in undercover narcotics investigations.

4. This affidavit is submitted in support of a criminal complaint alleging that:

a. WILLIAM NOBLES and JARON NABORS knowingly conspired with each other, and with others known and unknown, to possess with intent to distribute and to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846; and

b. ERICKA PRUITTE knowingly conspired with others known and unknown to possess with intent to distribute and to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; in violation of Title 21, United States

Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846 (the “**Subject Offenses**”).

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging NOBLES, NABORS, and PRUITTE with committing the **Subject Offenses**, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offenses alleged in the complaint.

6. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, telephone records, court-authorized interceptions of communications of NOBLES and NABORS, physical and electronic surveillance, and a seizure of controlled substances.

## II. SUMMARY OF THE INVESTIGATION

7. Law enforcement has been investigating NOBLES, a self-identified Black Gangster Disciple, for trafficking cocaine and other controlled substances in the Joliet, Illinois area. Through court-authorized interceptions of NOBLES’s communications,<sup>1</sup> corresponding surveillance, and a seizure of cocaine, law

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<sup>1</sup> On or about October 31, 2017, Chief Judge Ruben Castillo, Northern District of Illinois, signed an order authorizing the initial interception of wire and electronic communications over (312) 520-5994 (“Target Phone 2”). On or about December 4, 2017, Chief Judge Ruben Castillo, Northern District of Illinois, signed an order authorizing the initial interception of wire and electronic communications over (779) 230-7435 (“Target Phone 4”). On or about January 9, 2018, Chief Judge Ruben Castillo, Northern District of Illinois, signed an order authorizing the initial interception of wire and electronic communications over (779) 225-2283 (“Target Phone 5”). On or about January 25, 2018, Chief Judge Ruben Castillo, Northern District of Illinois, signed an order authorizing the initial interception of wire and electronic communications over (779) 205-9756 (“Target Phone 6”). On or about February 26, 2018,

enforcement identified NABORS as one of NOBLES's cocaine and heroin co-conspirators, and identified PRUITTE as a courier of drugs and narcotics proceeds between NOBLES and NABORS. Additionally, law enforcement has identified INDIVIDUAL A as one of NOBLES's cocaine suppliers, and determined that INDIVIDUAL A supplied NOBLES with cocaine that NOBLES subsequently supplied to PRUITTE on behalf of NABORS.

### **III. FACTS SUPPORTING PROBABLE CAUSE**

#### **A. NABORS Warns NOBLES of Suspected Law Enforcement Activity**

8. On or about November 10, 2017, at approximately 10:50 a.m. (Session #240), NOBLES, who was using Target Phone 2,<sup>2</sup> had a conversation with NABORS, who was using 470-626-0051 ("Nabors Phone 1").<sup>3</sup> In the conversation, NABORS

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Acting Chief Judge Amy J. St. Eve, Northern District of Illinois, signed an order authorizing the continued interception of wire and electronic communications over Target Phone 6, and the initial interception of wire and electronic communications over (708) 289-6155 ("Target Phone 7").

<sup>2</sup> I believe that NOBLES is the user of Target Phones 2, 4, 5, and 6 for several reasons. First, on or about March 28, 2018, law enforcement conducted a court-authorized search of NOBLES's residence at 809 Vine Street, Apartment 2B, in Joliet. During the search, law enforcement seized three telephones from NOBLES's residence; their telephone settings indicated they respectively had the same digits as Target Phones 2, 4, and 6. Additionally, a law enforcement agent familiar with NOBLES's voice from speaking to him during the search-warrant execution on his residence has positively identified the voice of the user of Target Phones 2, 4, 5, and 6 as NOBLES.

<sup>3</sup> I believe that NABORS is the user of Nabors Phone 1, as well as the following telephones: 708-341-8054 ("Nabors Phone 2"), 708-571-5146 ("Nabors Phone 3"), 786-494-9756 ("Nabors Phone 4"), 312-203-0993 ("Nabors Phone 5"), 708-227-8876 ("Nabors Phone 6"), and 312-207-9610 ("Nabors Phone 7"). First, as discussed below, an individual positively identified as JARON NABORS appeared at the time and place of meetings arranged by the users of certain of these telephones, so I believe that NABORS was the user of those telephones. Additionally, law enforcement has listened to the voices of the users of Nabors Phones 1, 2, 3, 4, 5, 6, and 7 and believe they all belong to the same person: NABORS.

warned NOBLES of potential law enforcement surveillance.<sup>4</sup> NABORS said, “I saw something strange when I left earlier man. . . . A grey pick up, tinted down, you know.” NOBLES responded, “A big one? . . . It came flying up the street earlier.” NABORS replied, “Man, I’m telling you baby boy, it was 4-door right? All the way tinted right?” NOBLES said, “Yep.” NABORS asked, “What time you saw it?” NOBLES responded, “I can’t remember what time it was, but it was a little bit after you left I think cause I went to my truck. . . . I just remember that big pick up truck. Came flying up the street.” NABORS replied, “I’m telling you man, cause I pulled off the second time. That’s why I’m saying that’s when I noticed the chump. I pulled off and ducked another way. I saw the chump go back another way. You know what I am saying [NABORS engaged in countersurveillance maneuvers when he saw the truck]? . . . It was a big, it was a big grey pick up. That’s the one baby. But you say it was flying?” NOBLES stated, “It came flying up the street, yep.” NABORS replied, “So had to be the second time then when I just saw you. . . . Cause that’s not shorty truck, you know I, I’m always looking [NABORS is always conscious of law enforcement surveillance]. So it had to be that time.” NOBLES stated, “Yeah, yeah, ok, alright I’m on it.”

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<sup>4</sup> Throughout this affidavit, I describe various conversations that were intercepted pursuant to court orders. These descriptions often include my understanding of what is being said during such conversations in brackets or otherwise. This understanding and interpretation of the conversations is based on (i) the content and context of the conversations, (ii) my experience and my fellow agents’ experiences as law enforcement officers, including our experience observing written conversations as a whole, and (iii) the investigation to date. The summaries of the conversations set forth in this affidavit are based on draft—not final—transcriptions. Certain summaries are based on draft English translations prepared by Spanish-speaking FBI monitors. Finally, the summaries contained herein do not include all potentially criminal communications intercepted, or topics covered during the course of the intercepted conversations.

9. Based on my training and experience, including my knowledge of these interceptions, I believe that in this conversation, NABORS accurately described a law enforcement vehicle that was in fact conducting surveillance in the area of NOBLES's residence at the time, and was warning NOBLES of that surveillance.

**B. NABORS Delivers Narcotics Proceeds to NOBLES on November 18, 2017**

10. On or about November 18, 2017, at approximately 8:06 p.m. (Session #445), NOBLES, who was using Target Phone 2, had a conversation with NABORS, who was using Nabors Phone 2. NABORS said, "I'll be pulling up in about 2 minutes, be looking out. I hit you earlier for this, remember." NOBLES responded, "Man, I was half asleep or something, I don't know, I sure didn't lock it in [NOBLES didn't save NABORS'S new telephone number], I thought I, cause you just gave me one the other day to lock in." NABORS responded, "Yeah this shit here, this shit locked in . . . This is the one I gave you the other day, I told you to lock in, you remember [NABORS gave NOBLES his new telephone number the other day]."

11. At approximately 8:22 p.m. (Session #449), NOBLES, who was using Target Phone 2, had a conversation with NABORS, who was using Nabors Phone 2. NOBLES asked, "What did you just give me? NABORS responded, "Stack [\$1,000], right?" NOBLES responded, "That was nine [\$900]."

12. Based on my training and experience, I believe that in this conversation, NABORS confirmed that he had just met NOBLES and had given him \$900 in narcotics proceeds.



**C. NOBLES Distributes 63 Grams of Cocaine to NABORS on December 5, 2017**

13. On or about December 5, 2017, at approximately 7:57 a.m. (Session #34), NOBLES, who was using Target Phone 4, had a conversation with NABORS, who was using Nabors Phone 3. NOBLES stated, "I got to go round around the corner though, I'll be back in about 10, 15 minutes tops." NABORS stated, "I'm right here by the gas station."

14. At approximately 9:05 a.m. (Session #44), NOBLES, who was using Target Phone 4, had a conversation with NABORS, who was using Nabors Phone 3. NABORS stated, "Rdy [ready to buy drugs]." NOBLES responded, "Only a 63 [NOBLES only has 63 grams of cocaine available]." NABORS replied, "Ok. 5 [be there in 5 minutes]."

15. Based on my training and experience, including (1) my knowledge that cocaine is commonly weighed in ounces, and that 2.25 ounces is the approximate equivalent of 63 grams of cocaine; and (2) NABORS indicated that he was ready and would be able to meet NOBLES in five minutes, I believe that after this conversation, NABORS met NOBLES and obtained 63 grams of cocaine from NOBLES.

**D. NABORS Delivers Narcotics Proceeds to NOBLES on December 9-10, 2017**

16. On or about December 9, 2017, at approximately 9:08 p.m. (Session #391), NOBLES, who was using Target Phone 4, had a conversation with NABORS, who was using Nabors Phone 3. During the conversation, NABORS arranged to drop off narcotics proceeds to NOBLES. NOBLES stated, "Call my girl and see if she come

to the back door and grab it [money] right quick, I had to run out right quick.” NABORS responded, “Ok, you didn’t have nothing on point [NOBLES doesn’t have any drugs at the moment]?” NOBLES responded, “I mean I have a little something but I ain’t around.” NABORS replied, “Oh damn. Ok, so it’s a double nickel [NABORS will drop off \$5,500], man.” NOBLES responded, “Ok, cool. I’m going to have something for you then. If you be up later you want a cut get at me early in the morning, I’ll have something to hold you over [NOBLES will give NABORS some drugs later].” At approximately 9:11 p.m., NABORS asked, “Is that your daughter or something coming out there?” NOBLES said, “Yeah, that’s my daughter.”

17. Based on my training and experience, including that my knowledge that NABORS arranged to deliver a “double nickel” to NOBLES and that NOBLES subsequently informed NABORS that the individual “coming out there” was NOBLES’s daughter, I believe that NABORS met NOBLES’s daughter at NOBLES’s residence to deliver \$5,500 in narcotics proceeds to NOBLES on December 9, 2017.

18. On or about December 10, 2017, at approximately 11:54 a.m. (Session #457), NOBLES, who was using Target Phone 4, had a conversation with NABORS, who was using Nabors Phone 3. In the conversation, they arranged another meeting for NABORS to drop off money. NABORS said, “I was gonna bring you that deal [money], I could just, whenever you ready or whatever I got that shit.” NOBLES stated, “I’ll be at the crib in about 40-45 minutes, I’m feeding these dogs.” At 3:47 p.m., NOBLES texted NABORS, “My tip [residence] at 430.” At 5:01 p.m. (Session #491), NOBLES told NABORS, “Okay, so check it out. Pull to the back and you’re

gonna see my white truck back there, right. Okay, on the, go in on the passenger side cause I got the driver's side locked. Go in on the passenger's side. . . . On that seat, that little seat cover thing, reach up under there. And then you can just put that under there and I'm fixing to have my girl to come back out and get it." NABORS responded, "Ok, alright, that's one five [\$1500] too baby boy."

19. At approximately 5:00 p.m., law enforcement surveillance observed a red Chevrolet Impala enter the driveway at NOBLES's residence at 809 Vine Street, Joliet, Illinois, and then drive away. As the Impala drove away, surveillance positively identified the driver as NABORS from a known photograph of NABORS.

20. Based on my training and experience, including my knowledge that (1) NOBLES directed NABORS to "put that" in NOBLES's car and that NABORS confirmed he would be delivering "one five" there, and (2) that surveillance subsequently observed NABORS driving to NOBLES's residence and then driving away, I believe that NABORS delivered \$1,500 in narcotics proceeds to NOBLES on December 10, 2017.

**E. NOBLES and NABORS Discuss the Distribution of 50 Grams of Heroin from January 10-11, 2018**

21. On or about January 10, 2018, at 12:53 p.m. (Session #48), NOBLES, who was using Target Phone 5, had a conversation with NABORS, who was using Nabors Phone 4. In the conversation, NABORS inquired about heroin. NABORS said, I said you got, uh, I need to go up on 50th street. For them suits [NABORS wants 50 grams of heroin]. . . . Is he, is he sellin' any suits [heroin]?" NOBLES responded, "That's what I, I got 50, I just grabbed the other day [NOBLES has 50 grams of

heroin].” NABORS said, “Oh, it was the same one? You still got them or what?” NOBLES responded, “Yeah, I didn’t give it to my dude yet cause I was waitin on him to bring me the last of that change in [NOBLES hasn’t distributed the heroin to a customer yet because he’s waiting on the customer to pay].” NABORS replied, “Okay then I’ll be there in the morning. And I’ll get ‘em.” NOBLES responded, “Okay, if he ain’t brought it to me by morning I just give it to you and I’ll go back around [if NOBLES’s other customer hasn’t paid NOBLES yet, NOBLES will give NABORS the 50 grams of heroin he already has and will get additional heroin for his other customer].”

22. On or about January 10, 2018, at approximately 3:57 p.m. (Session #57), NOBLES, who was using Target Phone 5, had a conversation with NABORS, who was using Nabors Phone 4. During the conversation, NABORS and NOBLES discussed drugs again. NABORS asked, “Did your guy ever come through the other day [did NOBLES’s supplier have drugs available for NOBLES to acquire]?” NOBLES responded, “Come through on what? Which one you talking about? The regular?” NABORS replied, “Yeah.” NOBLES replied, “Yeah, yeah, I had went and grabbed a little something. . . . it was decent [NOBLES received decent-quality drugs].” NABORS stated, “Yeah, they say it was about the same, man, the other day, when I went to holler at dude, you know [NABORS’s drug customers said that the drugs are the same quality]. . . . But see, he, he, he want a different [unintelligible] and all that. I said you want too much man [NABORS’s drug customers are too demanding about the quality].” NOBLES responded, “They want too much, man.”

NABORS said, “You know what I’m saying, man, talking about, these people telling me, yeah, the white coat, the tie, you know, I said, I don’t know what to tell you then man.” NOBLES stated, “Right, right, right, he need, he need to go shopping then, cause he acting like he still [unintelligible] from Colombia [NABORS’s customer should find his own drugs if he wants drugs that are higher purity].”

23. On or about January 11, 2018, at approximately 11:25 a.m. (Session #104), NOBLES, who was using Target Phone 5, had a conversation with NABORS, who was using Nabors Phone 4. NABORS stated, “Still hoping to make it there today. They canceled our flight man, trying to see if they will get us on another one. . . . Yeah so, so when I get there I’m going to hit you. I need that immediately [NABORS needs to obtain heroin from NOBLES immediately].” NOBLES responded, “Ok, alright, I still got it so far [NOBLES still has the heroin].” NABORS replied, “Yeah, yeah I need this, I’m trying to get there man, you know. And they are those same suits right [same quality heroin]?” NOBLES said, “Yeah.”

24. Based on my training and experience, including my belief that (1) drug dealers often refer to types and quantities of narcotics in coded terms, and (2) that heroin is commonly purchased in units of tens of grams (as opposed to ounces), I believe that in these conversations, NABORS and NOBLES discussed about the availability and quantity of 50 grams of heroin.

**F. NOBLES’s Distribution of Heroin to NABORS on January 26-27, 2017, and Subsequent Discussion of a Drug Debt Owed by NABORS**

25. On or about January 26, 2018, at approximately 8:14 a.m. (Session #63), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS asked, "What, what kind of suits [heroin] around, them same ones? Remember they was some dark suits [dark heroin]." NOBLES responded, "I haven't called him to see. . . . I ain't got none lately." NABORS replied, "Okay, yeah, see which one's he got." At 2:32 p.m., NABORS called NOBLES and asked, "Where you at?" NOBLES responded, "My tip [residence]."

26. At approximately 2:51 p.m., law enforcement surveillance observed a red Chevrolet Impala pull into the driveway at NOBLES's residence at 809 Vine Street. NOBLES walked out of the back door of the building and got into the front passenger seat. He got out of the car approximately three minutes later and went back inside the building. As the Impala left the residence, law enforcement positively identified the driver as NABORS.

27. Later that evening, at approximately 5:21 p.m. (Session #97), NABORS called NOBLES to request more heroin. NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS stated, "Yeah I need something big [more heroin], big boy." NOBLES responded, "Ok, let me see what I can do right quick cause I'm supposed be, I'm gotta to be somewhere at 6." NABORS replied, "Well, knowing you can get them, you just have them for me in the morning for me man. . . . You know what I'm saying, I'll get the other two [a quantity of additional heroin that NOBLES had available] so, just have both of them for me."

28. On or about January 27, 2018, at 6:11 a.m. (Session #119), NABORS, who was using Nabors Phone 5, texted NOBLES, who was using Target Phone 6, that he was “here.” Law enforcement surveillance then observed a vehicle appearing to be a red Chevrolet Impala pull into the driveway of 809 Vine Street at approximately 6:12 a.m. At approximately 6:17 a.m., the driver exited the car and entered the building. Approximately one minute later, the driver re-entered the car and drove away.

29. Based on my training and experience, including (1) my knowledge that drug dealers commonly refer to narcotics in coded terms and that heroin comes in several different varieties, including dark-colored heroin; (2) my knowledge that NABORS was seen meeting with NOBLES shortly after requesting that NOBLES ask about the availability of heroin on January 26, 2018; (3) my knowledge that NABORS asked NOBLES for “something big” and to reserve “the other two” for NABORS to pick up the following morning; and (4) an interception of NABORS’s text message stating that he was “here” and corresponding surveillance of the driver of a car that appeared to be NABORS’s red Impala entering NOBLES’s residence around the same time, I believe that NOBLES distributed a quantity of heroin to NOBLES on January 26 and on January 27, 2018.

30. On or about January 27, 2018, at approximately 12:22 p.m. (Session #140), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS asked, “What’s up, you hear from him [Nobles’s supplier] yet?” NOBLES responded, “I heard from him but he ain’t sounding

too good right now, he said he got a, he said he got to check and see what he got. He know you was running low and you know he's got a little nigga working for him.” NABORS asked, “But he got something though [the supplier has drugs available]?” NOBLES responded, “I don't know, he gotta go see.”

31. Later that night, at approximately 8:36 p.m. (Session #178), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. During the conversation, NABORS and NOBLES discussed heroin again. NOBLES stated, “I'm supposed to try to get out here first thing in the morning.” NABORS responded, “Oh he called you back? . . . Was it the same suits [same batch of heroin] you said?” NOBLES replied, “No it ain't the same suits [different batch of heroin]. . . . He said they all good though [the heroin is good quality].” NABORS asked, “But it'll be tomorrow though [NOBLES will have the heroin tomorrow]?” NOBLES responded, “Yeah.”

32. On or about January 28, 2018, at approximately 10:14 a.m. (Session #222), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. During the conversation, NABORS told NOBLES that he would pay back a drug debt owed to NOBLES. NABORS stated, “Yeah uh, listen, don't worry about that, when I get back around, we'll just be square and I'll be like four with you or something [NABORS will pay off part of his drug debt and will only owe NOBLES about \$400]. By the time I get back around, maybe you'll been holler at dude over them suits [NABORS asked NOBLES to inquire about the



availability of heroin] or somethin' and yeah so I be like four with you or something [NABORS will only owe NOBLES about \$400].”

**G. NOBLES's Distribution of 6.75 Ounces of Cocaine to NABORS via PRUITTE on February 2, 2018**

33. On or about January 30, 2018, at approximately 2:00 p.m. (Session #377), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS asked, “You ever come across them suits [Did NOBLES obtain more heroin]?” NOBLES said, “No, I don't know what he [NOBLES's heroin supplier] got goin' on but no.” NABORS responded, “Oh did you ever hit him back or no? I thought he told you he had some different suits or somethin' you said he could get.” NOBLES replied, “He had some, right, that's what he had, some different ones. I asked him was they the same, I asked him was they, you know, was they good as the last ones, he said he ain't for sure, say he had no complaints [NOBLES's supplier told him that the heroin was also good quality].”

34. On or about January 31, 2018, at approximately 11:03 a.m. (Session #449), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS asked, “Any word yet [regarding additional heroin]?” NOBLES said, “Basically, it's a go, I'm just waiting on the hit back. So I just gotta, I gotta you know, get the change together [NOBLES's supplier is able to supply heroin, and NOBLES just needs to get money together before he can purchase it].” NABORS responded, “Okay. Let me know, I'll have old girl [a courier later identified as PRUITTE] bump into you 'cause I shook.” NOBLES responded, “Okay, hit her and ask her what's the best time to bump into me, that way the sooner the better, that

way when it do happen I ain't gotta, in case she out and about and out and about we ain't gotta look for each other."

35. On or about January 31, 2018, at approximately 12:17 p.m. (Session #453), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS asked, "How you gonna do it [how is NOBLES going to get the drugs]?" NOBLES responded, "I gotta go get it." NABORS replied, "Right, okay. That's why I said so you gotta see her first, then go see him [does NOBLES need to meet PRUITTE to receive cash in order to obtain the drugs from NOBLES's supplier]?" NOBLES replied, "Yeah, yeah I'm popped [NOBLES doesn't have any cash on hand to buy the drugs]." They then agreed to have PRUITTE meet NOBLES around 7 p.m. that evening so that NOBLES could then see his supplier around 8 p.m. Later, they arranged to have PRUITTE meet with NOBLES on February 1, 2018.

36. On or about February 1, 2018, at approximately 6:56 p.m. (Session #579), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. In the conversation, they discussed the amount of drugs NABORS would like to obtain. NABORS stated, "I'm gonna have old girl [PRUITTE] bring like 7 [\$7,000] tomorrow cause I ain't gonna make it back, it's Saturday man." NOBLES responded, "What you tryin to do [what drugs does NABORS want]?" NABORS replied, "Uh, just probably give us um, a four [4.5 ounces of cocaine, or 127 grams] and a two-point [2.25 ounces of cocaine, or 63 grams] and uh, get that dude for them suits [a quantity heroin]." NOBLES responded, "Ok, you

wanna four-point, a two-point, and a 25 [25 grams of heroin]?” NABORS responded, “Right, right. And then I think I owe you like 300 [\$300] or something like that. No, let me see, about a bill 50 [\$150], or something like that. No about three or something. 350 [\$350] I owe you or something.” NOBLES said, “Well, as soon as she can get it to me the better. . . . I might be cool on the four and the two [in total, 6.75 ounces of cocaine], but the suits [heroin]. I’m waiting to see if something going to jump tonight on the four and the two, but you know the suits? I ain’t got the cash to go get that so, as soon I can get that I can go get it [\$7,000 is enough for NABORS to obtain the cocaine from NOBLES, but it’s not enough cash for NOBLES to acquire the heroin requested by NABORS].”

37. On or about February 2, 2018, at approximately 9:02 a.m. (Session #638), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NABORS stated, “Ole girl [PRUITTE] gonna be heading west, about 20 minutes, you going be over your way? . . . I’ll just send her by CVS over that way. She gonna give you 6, she got 6 [\$6,000]. Like I say, just give her that for me and then I’ll be in tomorrow and I’ll you know do the remainder [PRUITTE will give NOBLES \$6,000 in return for cocaine, and NABORS will meet NOBLES later to give him cash for the heroin].” NOBLES responded, “Ok.” NABORS said, “So just give her the four-point [4.5 ounces of cocaine], two-point [2.25 ounces of cocaine] for me, and then I get the remainder and get them suits for me [NABORS will collect money and will get the heroin from NOBLES later].” NOBLES said, “Ok.”

38. On or about February 2, 2018, at approximately 9:39 a.m. (Session #645), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NOBLES asked, “She close [is PRUITTE close to the CVS mentioned above]?” NABORS stated, “Yeah, she’s two minutes away big boy.” Surveillance subsequently observed a male subject exit the rear of NOBLES’s residence at 909 Vine Street, enter a white Ford Ranger, and drive away.

39. At approximately 9:41 a.m., surveillance positively identified PRUITTE (from comparison to her Illinois driver’s license photograph) entering the parking lot of a CVS located at 809 Plainfield Road in Joliet, Illinois. PRUITTE was driving a dark-colored Hyundai sedan, which was the same car driven by PRUITTE during her arrest (as discussed below in paragraphs 53-54). At approximately 9:46 a.m. (Session #650), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NOBLES asked, “What she in [what car is PRUITTE in]?” NABORS responded, “You know that same car, that dark blue Hyundai.” At approximately 9:52 a.m., surveillance observed a white Ford Ranger back in next to PRUITTE’s Hyundai. The driver of the Ranger was positively identified as NOBLES. NOBLES entered the Hyundai, reentered the Ranger approximately seven minutes later, and drove away.

40. On or about February 2, 2018, at approximately 10:01 a.m. call (Session #651), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. During the conversation, they confirmed that NOBLES had just distributed 6.75 ounces of cocaine to PRUITTE and NABORS.

NABORS said, "I appreciate it big boy." NOBLES said, "That was a 4 [4.5 ounces of cocaine] and a 2 [2.25 ounces of cocaine] and I'ma try to work on the other things [heroin]." NABORS said, "Yeah, and like I said I'll be there tomorrow, I'll straighten you with the rest of them [NABORS will buy the heroin later]."

41. Based on my training and experience, including (1) my belief that "four-point" and "two-point" are code words used in the Joliet area to respectively describe 4.5 ounces and 2.25 ounces of cocaine; (2) my knowledge that law enforcement later seized 9 ounces of cocaine from PRUITTE after NABORS asked for "four two-points," as discussed below in paragraphs 60 and 63; (3) my belief that \$7,000 is roughly consistent with the market price for 6.75 ounces of cocaine; (4) my belief that NABORS and NOBLES previously used the code "suits" to describe heroin; (5) surveillance of NOBLES's meeting with a female courier later identified as PRUITTE at a CVS (as arranged between NOBLES and NABORS); and (6) interceptions confirming that a distribution of cocaine had occurred, I believe that on February 2, 2018, NOBLES distributed 6.75 ounces, or approximately 191 grams of cocaine, to PRUITTE that was ultimately destined for NABORS in exchange for \$6,000, and that NOBLES agreed afterward to distribute heroin to NABORS at a later date.

**H. NOBLES's Distribution of 30 Grams of Fronted Heroin to PRUITTE on February 3, 2018**

42. On or about February 3, 2018, at approximately 11:00 a.m. (Session #775), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. During the conversation, NABORS informed NOBLES that PRUITTE would be picking up the heroin discussed above in

paragraph 41. NABORS stated, “I’m gonna have ole girl [PRUITTE] get ready to bump into you then, she gonna give you 15 [\$1,500], so just get 30 [30 grams of heroin] for me.” NOBLES said, “Ok, I’ll see what I can do.” At approximately 11:11 a.m. (Session #778), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. NOBLES told Nabors to “tell her if she can, come to the Mexican store next right here.” Later, NOBLES told NABORS to tell PRUITTE to meet him a nearby McDonald’s.

43. Based on my training and experience, including my knowledge that (1) heroin is commonly sold in units of tens of grams, (2) my knowledge that the market price of 30 grams of heroin was greater than \$1,500 (so NABORS likely owed NOBLES some amount of money for the 30 grams of heroin distributed by NOBLES), and (3) my knowledge of the interceptions between NOBLES and NABORS in which NOBLES provided several locations for NABORS’s courier to meet NOBLES, I believe that NOBLES distributed 30 grams of heroin partially on credit to PRUITTE and NABORS.

**I. NOBLES’s Distribution of 2.25 Ounces of Cocaine to NABORS on February 4, 2018**

44. On or about February 4, 2018, at approximately 8:09 a.m. (Session #954), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. In the conversation, NABORS ordered cocaine and heroin from NOBLES. NABORS said, “Yeah, as a matter of fact, just uh, since you had that, just do another 30 piece [another 30 grams of heroin in addition to the 30 grams distributed to PRUITTE on the preceding day, as discussed above in

paragraphs 42-43] then, I just bring you a bill [NABORS will pay for the heroin upfront]. You know what I'm sayin?" NOBLES said, "Ok." NABORS said, "Yeah, do that, and I'm still gonna need that two-point [2.25 ounces of cocaine] too."

45. On or about February 4, 2018, at approximately 8:11 a.m. (Session #956), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 5. During the conversation, NOBLES told NABORS that NOBLES's heroin supplier was out of heroin: "He just hit me back. He said nigga bought him out last night." NABORS said, "Ok, well let me know then. Well, I'll just uh, I'll grab that two-point [2.25 ounces of cocaine] from you then, when he get back with you then I'll just leave that with you so you have it, you know [NABORS will leave extra money with NOBLES so that NOBLES can acquire the heroin that NABORS requested when it's available]." NABORS later stated that he would be pulling up in two minutes.

46. At approximately 8:15 a.m., law enforcement surveillance observed a red Chevrolet Impala (the same color, make, and model previously driven by NABORS, as discussed above) pull up to NOBLES's residence at 809 Vine Street. Law enforcement observed an individual exit the driver seat and enter the back door of the building. Less than one minute later, the individual left the building, re-entered the Impala, and drove away.

47. Based on my training and experience, including (1) my belief that NABORS and NOBLES refer to 2.25 ounces of cocaine as a "two-point," (2) my knowledge of interceptions in which NABORS asked NOBLES to "grab that two-

point,” and subsequent surveillance indicating that NABORS drove to meet NOBLES at NOBLES’s residence, I believe that NOBLES distributed 2.25 ounces, or approximately 63 grams, of cocaine to NABORS on February 4, 2018.

**J. NOBLES’s Distribution of 25 Grams of Fronted Heroin to PRUITTE on February 8, 2018**

48. On or about February 6, 2018, at approximately 10:20 p.m. (Session #1101), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 6. NOBLES asked, “How many suits [what quantity of heroin does NABORS want]?” NABORS responded, “25 [25 grams of heroin].”

49. On or about February 7, 2018, at approximately 1:11 p.m. (Session #1141), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 6. NABORS asked, “Did you see him yet?” NOBLES responded, “Yeah I seen him, but uh, I’m tied with my kids right now. . . . I need about at least an hour, hour and a half.” NABORS said, “That’s cool, what color suits [what type of heroin] was it?” NOBLES said, “Shit, you know, it looked like a dark brown though [the heroin was dark brown in color].”

50. On or about February 8, 2018, at approximately 8:28 a.m. (Session #1196), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 6. NABORS said, “Lemme call her [Pruitte] then.” NOBLES said, “Yeah, call her, call her and, give me about, I’ll be west in about 20, I’d say about 20.”

51. On or about February 8, 2018, at approximately 8:41 a.m. (Session #1207), NOBLES, who was using Target Phone 6, had a conversation with NABORS,



who was using Nabors Phone 6. During the conversation, they arranged for PRUITTE to meet NOBLES. NABORS said, “Okay I tell her go there in 20. She gonna bring that back to you, she gonna go holler at dude, then she bring that back to you [PRUITTE is going to meet NOBLES to receive 25 grams of fronted heroin, will then meet a drug customer to sell the heroin, and will then bring the proceeds back to NOBLES to pay for the 25 grams of heroin].”

52. At approximately 9:06 a.m. that day, after NABORS told NOBLES that PRUITTE had arrived, law enforcement surveillance observed NOBLES exit his residence at 809 Vine Street, get in his pickup truck, and drive away.

53. Based on my training and experience, including (1) my belief that NOBLES and NABORS use the code “suits” to refer to heroin, (2) my knowledge that a type of heroin is often dark-brown in color, (3) interceptions describing how PRUITTE would meet NOBLES to obtain heroin, and (4) law enforcement surveillance of NOBLES leaving his residence shortly after being informed that PRUITTE had arrived, I believe that NOBLES distributed approximately 25 grams of heroin to PRUITTE on credit.

54. Later that day, at approximately 2:17 p.m. (Session #1220), NOBLES, who was using Target Phone 6, had a conversation with NABORS, who was using Nabors Phone 6. In the conversation, NABORS called NOBLES to let him know that PRUITTE was on his way back to NOBLES with the money. NABORS said, “Okay, I’m a hit you about 20 then, I’ll hit you when she right by the, uh, by the CVS.” NOBLES asked, “But she tryin’, tryin’ to do something else [get more heroin]? Or

tryin' to bring that back [bring money back to NOBLES]? NABORS said, "I'm gonna have her bring that, bring that to you [PRUITTE will be bringing money back to NOBLES to pay for the fronted heroin]." NOBLES said, "I ain't got no wheels." NABORS replied, "Well you wanna wait then, I mean she got it [the money], you know what I'm sayin? . . . I'ma call you when she right there."

55. At approximately 2:44 p.m. (Session #1229), NABORS told NOBLES, "She gonna pull up on you in about 5. Hold on, hold on, this is her. . . . Yeah, she'll be pullin up on you in about 5."

56. At approximately 2:53 p.m. law enforcement observed a dark-colored Hyundai pull over in front of 809 Vine Street. The driver was a black female. NOBLES approached the front passenger side, opened the car door, and reached into the car. Approximately one minute later, NOBLES shut the car door and walked toward the back entrance of the building, and the Hyundai drove away. The Hyundai had the same license plate number as the Hyundai in which PRUITTE was later arrested, as discussed below in paragraph 72.

57. Based on my training and experience, including my knowledge of previous interceptions between NOBLES and NABORS, I believe that NOBLES received payment for the fronted heroin from PRUITTE on behalf of NABORS.

**K. Distribution of Cocaine from INDIVIDUAL A and INDIVIDUAL B to NOBLES, and Subsequent Distribution to PRUITTE and NABORS**

58. Based on interceptions of NOBLES, INDIVIDUAL A, and INDIVIDUAL B, as well as corresponding surveillance and a seizure of cocaine and other drugs from

PRUITTE, law enforcement has developed evidence that INDIVIDUAL A and INDIVIDUAL B supplied one kilogram of cocaine to NOBLES on or about February 28, 2018, and that NOBLES subsequently supplied a portion of that cocaine to PRUITTE and NABORS.

***INDIVIDUAL A's Distribution of a Sample of Cocaine to NOBLES on  
February 27, 2018***

59. On or about February 27, 2018, NOBLES and INDIVIDUAL A arranged to meet so that INDIVIDUAL A could provide NOBLES with a sample of cocaine. At 1:30 p.m. (Session #2152), NOBLES, who was using Target Phone 6, had a conversation with INDIVIDUAL A, who was using Target Phone 7.<sup>5</sup> NOBLES said, "What up, [the first letter of INDIVIDUAL A's first name]?" INDIVIDUAL A responded, "I'm alright, I'm alright, hey, I'm on way to go take some pictures of this other engine [get a sample of cocaine] and shit um, you want me to bring you pictures so you can see it [bring you a sample so you can inspect it]? Or is he not interested in that motor anymore [is your customer not interested in buying cocaine anymore]?" NOBLES replied, "No, we can always as long as we can, you know, I think if we can pique his interest we can get him back, it's just about having, you know something he can deal with [NOBLES's customer is interested in buying cocaine]."

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<sup>5</sup> The identification of INDIVIDUAL A as the user of Target Phone 7 is based on the following. First, as discussed below, on or about February 27, 2018, NOBLES arranged a meeting with the user of Target Phone 7 at a Walmart that INDIVIDUAL A attended. Second, the following day, the user of Target Phone 7 arranged a meeting at a hot dog restaurant that INDIVIDUAL A attended. Because INDIVIDUAL A showed up to these two separate meetings at the times and places arranged by the user of Target Phone 7, I believe that INDIVIDUAL A is the user of Target Phone 7.

INDIVIDUAL A said, “Yeah, cause there’s that other type of one, ah, engine [different type of cocaine] and shit, I’m gonna go, go to A-town right now real quick and ah um, I’ll call you, maybe we can meet somewhere and I’ll, I’ll, let you see it [show NOBLES the sample].” NOBLES responded, “Ok hit me up.”

60. At approximately 4:05 p.m. (Session #2162), NOBLES, who was using Target Phone 6, had a conversation with INDIVIDUAL A, who was using Target Phone 7. In the conversation, they arranged to meet at a store to distribute the sample of cocaine. INDIVIDUAL A said, “You wanna meet at Menards, I gotta go to Menards real quick.” NOBLES responded, “Okay I can go yeah I can try Walmart then cause I gotta go get a birthday cake. . . . Well my question to you is I got somebody that want a nine [NOBLES knows of someone who wants nine ounces of cocaine; as discussed below in paragraph 71, JARON NABORS ordered nine ounces of cocaine from NOBLES]. And, uh, if everything check out, how long will it take you to get to it [how long will it take for INDIVIDUAL A to supply the cocaine]?” INDIVIDUAL A responded, “If everything check out what?” NOBLES replied, “How long will it take you to get to it.” INDIVIDUAL A stated, “Oh that’s what I was going to talk to you about. Um cause my guy like yeah tell him to get to it right away that way we can uh we can do everything today [INDIVIDUAL A can do the deal today]. . . . Yeah so it just depends on how long it’s going to take you to test drive it [inspect the sample] and shit.” NOBLES stated, “Okay well I can take that right to somebody. What basically do, I can run it right dude whole and I’ll find a brother if I have to [NOBLES can inspect the sample right away].”

61. After some additional communications, at approximately 5:23 p.m. (Sessions #2174, 2180), INDIVIDUAL A and NOBLES arranged to meet in a Walmart. At about 5:15 p.m., law enforcement surveillance observed INDIVIDUAL A (who was positively identified from a known photograph of INDIVIDUAL A) arrive at a Walmart parking lot located at 2424 W. Jefferson St in Joliet, Illinois. Surveillance positively identified NOBLES arrive there at 5:30. Surveillance observed NOBLES exit the Walmart at 5:45 p.m. and driving away. Although law enforcement surveillance did not observe a meeting inside the Walmart between NOBLES and INDIVIDUAL A, at approximately 7:13 p.m. (Session #2195), NOBLES texted INDIVIDUAL A, “A-1 [the sample of cocaine is good].”

62. At approximately 7:24 p.m. (Session #2203), NOBLES, who was using Target Phone 6, had a conversation with INDIVIDUAL A, who was using Target Phone 7, regarding the sample of cocaine. NOBLES stated, “I told you he had made a little move. So I don’t know what he, I don’t know how soon talkin what he got but I know have his brother check that lick and he, and uh, he froze up like a mummy [NOBLES doesn’t know when his customer wants the cocaine, but the customer liked the sample]. . . . So um, all I can do is try to get on him and ride him and see, where we talkin and what we talkin [NOBLES needs to check with his customer to see how much cocaine he wants and when he wants the cocaine], you know what I’m saying?” INDIVIDUAL A responded, “Yeah, the thing is that I just want to see where you’re at or where you got it at or whatever so I can swap the ones I have there, I’m going to swap them out regardless, you know [INDIVIDUAL A wants to swap cocaine]. . . .”

Um, and I don't know what you, how much you looking at to get, one or two [how much cocaine NOBLES wants from INDIVIDUAL A].” NOBLES replied, “Yeah, well, see that's what I'm saying, I don't know cause he, he just a move not long ago [NOBLES's customer recently bought drugs so NOBLES doesn't know how much the customer wants]. . . . So, I don't know what his finances, like, he ain't really going tell me all of that. I'm just going to keep driving on him to see what's what, but I, I think later on, I'm saying right now I got somebody that want nine [NABORS wants nine ounces of cocaine from NOBLES] and then I almost got enough for a half [NOBLES almost has enough money to purchase a half-kilogram of cocaine]. If you want to do it or you just want to wait and do the whole thing [INDIVIDUAL A can supply NOBLES with nine ounces of cocaine or can supply NOBLES with a whole kilogram of cocaine], it's on you.” INDIVIDUAL A stated, “Well probably be until tomorrow, is that cool?” NOBLES stated, “Yeah, bright and early though cause this nigga ain't going to let me hold his money too long.”

***INDIVIDUAL A and INDIVIDUAL B's Distribution of a Kilogram of Cocaine to NOBLES on February 28, 2018***

63. On or about February 28, 2018, beginning at approximately 11:26 a.m. (Session #2231), NOBLES, who was using Target Phone 6, had a text-message conversation with INDIVIDUAL A, who was using Target Phone 7. During the conversation, NOBLES told INDIVIDUAL A that he would be home in 30-40 minutes. At approximately 12:13 p.m. (Session #2234-35), INDIVIDUAL A asked, “On his way [the courier is on his way] cool?” NOBLES responded, “15 mins [NOBLES would be home in 15 minutes].”

64. At approximately 12:21 p.m. (Session #213), INDIVIDUAL A, who was using Target Phone 7, had a conversation with INDIVIDUAL B, who was using (815) 514-6803 (“Individual B Phone 1”).<sup>6</sup> INDIVIDUAL A stated, “Hey, he [Nobles] says ten more minutes. Do you want to stop and get something to eat real quick? . . . Stop right there uh at the hot dog, at the hot dog shop right there by the cemetery.” Law enforcement surveillance subsequently positively identified INDIVIDUAL A and INDIVIDUAL B meet at Hey Hot Dog restaurant at 601 Ruby Street in Joliet, which is located approximately 0.3 miles away from NOBLES’s residence at 809 Vine Street.

65. At 12:29 p.m. (Session #2236), NOBLES, who was using Target Phone 6, told INDIVIDUAL A, who was using Target Phone 7, that NOBLES had arrived at home. Meanwhile, law enforcement surveillance observed NOBLES pull into the residence in a white pickup truck at approximately 12:25 p.m. At approximately 12:46 (Sessions #2237-40), INDIVIDUAL A stated, “Ok, we stopped for some hot dogs. . . . He [INDIVIDUAL B] should be there in less than 5 mins. Matter a fact just wait outside he should be pulling up.” Law enforcement surveillance subsequently observed INDIVIDUAL B pull up to the back of 809 Vine Street in the same vehicle that law enforcement observed him driving to meet INDIVIDUAL A at Hey Hot Dog. Surveillance then observed NOBLES come out of the building, enter the front passenger seat of INDIVIDUAL B’s car, and then return to the building.

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<sup>6</sup> I believe that INDIVIDUAL B is the user of Individual B Phone 1 because, as discussed below, INDIVIDUAL A arranged a meeting with the user of Individual B Phone 1 at a hot dog restaurant on February 28, 2018, and law enforcement surveillance subsequently observed INDIVIDUAL A and INDIVIDUAL B meeting at that restaurant.

66. At approximately 12:50 p.m. (Sessions #224-231), INDIVIDUAL A, who was using Target Phone 7, had a text-message conversation with INDIVIDUAL B, who was using (815) 258-9218 (“Individual B Phone 2”).<sup>7</sup> INDIVIDUAL B stated, “Got it. With money [INDIVIDUAL B picked up money from NOBLES].” INDIVIDUAL A responded, “Ok. Should be 14500 [\$14,500]. Count them ASAP.”

67. At approximately 12:57 p.m. (Session #233), INDIVIDUAL A, who was using Target Phone 7, had a conversation with INDIVIDUAL B, who was using INDIVIDUAL B Phone 2. INDIVIDUAL A asked, “Did the black guy [Nobles] tell you anything? No, right?” INDIVIDUAL B responded, “Nah, he didn’t say shit. He just said, ‘I’ll see you later.’” INDIVIDUAL A replied, “Yeah, cause I misunderstood him, that he only wanted the half [NOBLES only wanted a half-kilogram of cocaine, but INDIVIDUAL A delivered a whole kilogram of cocaine]. But he’s going to try to go ahead and move the other one [NOBLES is going to try to sell the additional cocaine that INDIVIDUAL A delivered]. But if you want, call your guy, tell him that there’s a half there [half-kilogram of cocaine with NOBLES], that he wanted available. If he’s interested, it’s there and if not, we’ll just leave it, leave it there with dude [INDIVIDUAL A asked INDIVIDUAL B to contact INDIVIDUAL B’s customer to see if the customer would be interested in buying the additional cocaine that INDIVIDUAL A mistakenly sent to NOBLES. If not, they would leave the additional cocaine with NOBLES].” INDIVIDUAL B responded, “Alright, let me hit him up right

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<sup>7</sup> A law enforcement agent has reviewed the voices of both the user of Individual B Phone 2 and the user of Individual B Phone 1 and believes they are the same person: INDIVIDUAL B.



now.” INDIVIDUAL A replied, “Alright then, hey, but tell him, you had already told him that I was going to raise it right [INDIVIDUAL A is going to raise the price of cocaine on this customer]? From the first time.” INDIVIDUAL B stated, “Yeah, I told him that it was going to go up the next time cause he fucked up. Yeah, I told his ass.” INDIVIDUAL A responded, “So yeah, so give him the half for, give it to him for, what would that be, for 16, 16 1/2 [\$16,000 or \$16,500 for the half-kilogram of cocaine], around that.” INDIVIDUAL B asked, “What do you get, what are you getting off of it? 15 [INDIVIDUAL A would get \$15,000 from the sale of the half-kilogram]?” INDIVIDUAL A replied, “Yeah, yeah, yeah, and then you get the other [INDIVIDUAL B will get the rest from the sale].” INDIVIDUAL B responded, “Alright, I’ll tell him.” Based on my training and experience, I believe that \$16,000 or \$16,500 was generally consistent with the market price for a half-kilogram of cocaine at the time.

68. At approximately 1:20 p.m. (Session #234), INDIVIDUAL B, who was using Individual B Phone 2, called INDIVIDUAL A, who was using Target Phone 7, and stated, “Everything is there dude. Yeah, 14-5 [INDIVIDUAL B has all \$14,500 from NOBLES].”

69. At approximately 1:34 p.m. (Session #2251), INDIVIDUAL A, who was using Target Phone 7, had a conversation with NOBLES, who was using Target Phone 6. INDIVIDUAL A asked, “Hey, how much you said you gave dude [how much money did NOBLES give INDIVIDUAL B]?” NOBLES stated, “Uh, fourteen five [\$14,500].” INDIVIDUAL A responded, “Well, supposed to be fifteen [\$15,000] wasn’t it? Wasn’t it supposed to be, you, you get half [NOBLES wanted a half-kilo], right?”

NOBLES replied, "Yeah that's what, yeah I had told you half." INDIVIDUAL A responded, "Uh-huh. Ain't it supposed to be fifteen [\$15,000]?" NOBLES said, "Right, that's what I said, I owe you five [\$500]." INDIVIDUAL A said, "Yeah. You know what happened, you know what I was thinking, cause, I told my cousin it was fourteen five [INDIVIDUAL A told INDIVIDUAL B that NOBLES should have given INDIVIDUAL B \$14,500 for the cocaine] and shit, I was like, naw he probably gave fifteen and since I said fourteen five, he probably try to keep the other five [INDIVIDUAL A thought that INDIVIDUAL B may have received \$15,000 from NOBLES in exchange for the cocaine but kept \$500 because he knew that INDIVIDUAL A was only expecting to receive \$14,500 from NOBLES]." NOBLES stated, "No, that was all the change I had [NOBLES only had \$14,500]. I owe you five [\$500]."

***NOBLES's Subsequent Distribution of Cocaine to PRUITTE and NABORS  
on February 28, 2018***

70. Law enforcement did not intercept any other communications over Target Phone 6 until approximately 2:39 p.m. (Session #2254). Then, NOBLES, who was using Target Phone 6, had a conversation with JARON NABORS, who was using 312-207-9610 ("Nabors Phone 7"). NABORS stated, "Do me a favor, put them, uh, all in two-points for me [NABORS asked NOBLES to package cocaine into 2.25-ounce packages]." NOBLES said, "Ok, alright, give me a second then." NABORS said, "You over your way [are you at home]? Unless you want her [PRUITTE] to bump into you somewhere else?" NOBLES said, "No, you gotta give me a minute to go do that." NABORS said, "Ok, so it will be four of them, right [four 2.25-ounce packages of

cocaine, or nine ounces of cocaine]?” NOBLES responded, “Yep. You say you wanted, you say get the whole thing right?” Nabors replied, “Right, right, yeah.”

71. At approximately 3:06 p.m. (Session #2256), NOBLES texted NABORS, “Send her [PRUITTE].” At 3:54 p.m. (Session #2262), NABORS called NOBLES and said, “She’s pulling up.” Meanwhile, toll records for Nabors Phone 7 showed that NABORS communicated with (312) 806-7176, later determined to be used by PRUITTE (“Pruitte Phone 1”),<sup>8</sup> at approximately 3:39 p.m. Those toll records further show that between 3:06 p.m. and 4:45 p.m., NABORS only communicated with Target Phone 6 (used by NOBLES) and Pruitte Phone 1 (used by PRUITTE).

72. According to a court-authorized search of Pruitte Phone 1 (which was seized from PRUITTE’s purse as discussed below), at approximately 3:55 p.m., PRUITTE received a text message from NABORS, who was using Nabors Phone 7, stating, “Back [go to the rear of NOBLES’s residence] bae.” Around this time, law enforcement surveillance observed a Hyundai sedan back down the driveway to the rear of NOBLES’s residence at 809 Vine Street. At approximately 3:58 p.m., NOBLES walked out of the building and got into the front passenger side. A minute later, NOBLES exited the car and went back into the building.

73. After the Hyundai drove away from the residence, law enforcement observed the Hyundai speeding and stopped the Hyundai. The driver, identified from her driver’s license as ERICKA PRUITTE, was the only occupant of the car. When

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<sup>8</sup> I believe that PRUITTE is the user of Pruitte Phone 1 because during the traffic stop of PRUITTE discussed below, law enforcement seized Pruitte Phone 1 from a purse containing Pruitte’s wallet and personal belongings that was inside the car.

asked if there was anything illegal in the car, PRUITTE stated that she had some marijuana. Additionally, during the stop, a narcotics canine subsequently alerted to the scent of narcotics on the passenger side of the car. In the front passenger seat was 250.6 grams, or approximately 9 ounces, of cocaine hydrochloride in a yellow sandwich baggie box covered by a pillow. The cocaine was packaged in four packages, each weighing approximately 2.25 ounces, as requested by NABORS as discussed above in paragraph 52. In the backseat was a white grocery bag containing 155.3 grams of a mixture and substance containing cocaine base, 28.6 grams of a mixture and substance containing cocaine, and 40.1 grams of a mixture and substance containing heroin.<sup>9</sup> Law enforcement also seized Pruitte Phone 1 from a purse containing Pruitte's wallet and personal belongings that was inside the car.

74. PRUITTE was arrested and later read her *Miranda* rights. She waived them and agreed to speak to law enforcement. PRUITTE stated that the drugs were not hers and that she let someone borrow her car that day. She stated that she didn't know the drugs were there but that she had dropped someone off (she refused to say who), and that person must have put the drugs on her seat and covered it with a pillow on his way out of her car.

75. Based on my training and experience, including (1) my knowledge of previous interceptions of NOBLES, INDIVIDUAL A, INDIVIDUAL B, and NABORS; (2) surveillance of INDIVIDUAL B's meeting with NOBLES; and (3) the close timing

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<sup>9</sup> All weights and identifications of substances are taken from chemical analyses performed by DEA North Central Laboratory.

between when NOBLES met with INDIVIDUAL B and then met PRUITTE, I believe that the cocaine that was seized from PRUITTE's vehicle was originally supplied by INDIVIDUAL A and INDIVIDUAL B and destined for NABORS.

***Subsequent Discussion Between NOBLES and INDIVIDUAL A About the Extra Cocaine***

76. On or about March 1, 2018, at 6:20 p.m. (Sessions #2337-42), NOBLES, who was using Target Phone 6, had a text-message conversation with INDIVIDUAL A, who was using Target Phone 7. In the conversation, they discussed the additional half-kilogram of cocaine that INDIVIDUAL A had mistakenly delivered to NOBLES. INDIVIDUAL A asked, "What up B?" NOBLES responded, "Nothing yet [no buyers for the extra cocaine]." INDIVIDUAL A replied, "That's fine I haven't got any calls on it yet so if get some buyers go ahead [INDIVIDUAL A hasn't found any buyers either, so if NOBLES can find one he should go ahead and sell the extra]." NOBLES responded, "Ok." INDIVIDUAL A stated, "Figured being the first of the month [narcotics sales at the end of the month are slow leading up to the first week of the following month]." NOBLES stated, "Right."

**IV. CONCLUSION**

77. Based on the above information, there is probable cause to believe that:

- a. From on or about November 10, 2017, and continuing until on or about February 28, 2018, at Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere, WILLIAM NOBLES and JARON NABORS did knowingly conspire with each other, and with others known and unknown, to possess with intent to distribute and distribute a controlled substance, namely, 500 grams or more of a

mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846; and

b. From on or about February 2, 2018, and continuing until on or about February 28, 2018, at Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere, ERICKA PRUITTE did knowingly conspire with others known and unknown to possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

FURTHER AFFIANT SAYETH NOT.

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BRIAND. PROCHASKA  
Task Force Officer, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN to before me on August 9, 2018.

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MARIA VALDEZ  
United States Magistrate Judge