

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

FREDRICK STEWART,
also known as "Gage";
ANTHONY "Tony" REDDING,
also known as "Tiger";
RAMONT AUSTIN;
FRANKLIN "Frank" REDDING; and
BARRY MICKIEL,
also known as "Big Steve".

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

On or about January 2, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Barry MICKIEL violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Distribution of a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance.

Count Two

On or about January 24, 2019 at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Ramont AUSTIN violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Distribution of a controlled substance, namely, 28 grams or more of a mixture and substance containing cocaine base.

Count Three

On or about February 8, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Frank REDDING violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Distribution of a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance.

Count Four

On or about March 8, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Tony REDDING violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	Distribution of a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance.

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.

SHAMAR BAILEY
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: July 27, 2020

Judge's signature

City and state: Chicago, Illinois

BETH W. JANTZ, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SHAMAR BAILEY, being duly sworn, state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since approximately March 2016. I am currently assigned to the FBI's Chicago Field Division, Violent Gangs - South. As part of my duties as a FBI Special Agent, I investigate criminal violations of Federal and State controlled substance laws including, but not limited to, conspiracy to possess with intent to distribute a controlled substances, in violation of Title 21, United States Code, Section 846; and possession with intent to distribute and distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. I have received specialized training in the means and methods by which individuals and drug trafficking organizations conduct their illegal drug trafficking activities. I have also participated in multiple investigations involving illegal drug trafficking by drug trafficking organizations. As such, I am familiar with the various methods used by drug traffickers to transport, store, and distribute narcotics and narcotics proceeds. I have participated in investigations involving various drug types, including heroin, cocaine, and cocaine base in the form of crack cocaine. I have experience with a wide range of investigative techniques, including various types of visual and electronic surveillance, the interception of wire communications; the

debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances; facilitating controlled deliveries of narcotics; the execution of search and arrest warrants; and the management and use of informants. Based upon my experience and training, I am familiar with the ways in which drug traffickers conduct their unlawful drug trafficking activity, including, but not limited to, their use of code words and numbers to conduct their transactions, their methods for concealing narcotics and narcotics proceeds, and their use of violence and threats of violence to protect their organization.

3. This Affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging: 1) Frederick STEWART and Barry MICKIEL with distribution of a controlled substance, namely 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); 2) Frederick STEWART and Ramont AUSTIN with distribution of a controlled substance, namely 28 grams or more of a mixture and substance containing cocaine base, in violation of Title 21, United States Code, Section 841(a)(1); 3) Frederick STEWART and Frank REDDING with distribution of a controlled substance, namely 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); and 4) Frederick STEWART and Tony REDDING with distribution of a controlled substance, namely

40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). As such, 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 offense alleged in the complaint.

4. The statements contained in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided by other federal law enforcement officers and Chicago Police Department officers; (c) laboratory analysis reports; (d) surveillance reports; (e) criminal history records; (f) information from confidential informants; and (g) my training and experience and the training and experience of other law enforcement agents with whom I have consulted.

I. Facts Establishing Probable Cause¹

A. Summary

5. Since in or about early 2018, the FBI has been investigating members and associates of the Black Disciples, a large street gang based in Chicago, Illinois. Through information from multiple confidential sources, consensually-monitored communications of members and associates of the Black Disciples, and other investigative means, the investigation has shown that members of the Black Disciples street gang engage in, among other criminal activities, the acquisition, sale, and delivery of narcotics. In particular and as described below, the FBI identified Black Disciples gang members Frederick STEWART, also known as “Gage;” Ramont AUSTIN; Tony REDDING, also known as “Tiger;” Frank REDDING, and Barry MICKIEL, also known as “Big Steve,” as being involved in the distribution of narcotics in the Chicago area.

6. As described further below, on multiple occasions, STEWART, AUSTIN, Tony REDDING, Frank REDDING, and MICKIEL distributed crack cocaine and

¹ At various points in this affidavit, I will offer my understanding and interpretation of certain statements, including intercepted or recorded conversations, sometimes in bracketed comments. My understanding and/or interpretation of these conversations, which are sometimes summarized or excerpted herein, is based upon the contents of the conversations, the context of both prior and subsequent conversations, information received from CS-1 and other law enforcement agents, my knowledge derived from this investigation, and my experience and familiarity with narcotics and firearms trafficking. Except as noted, the summaries of conversations contained in this affidavit that occurred in relation to the controlled purchases of narcotics represent a review of the audio and video recordings and do not represent finalized transcripts of the conversations and may not represent the entire conversation that occurred between the identified individuals. In addition, the language that is quoted from conversations not recorded is based on the memory and recitation of the informant.

heroin to an individual who, unbeknownst to them, was a cooperating source (“CS-1”) working under the direction and control of law enforcement. More specifically:

- On or about June 1, 2018, STEWART sold CS-1 approximately 27 grams of cocaine base, supplied by AUSTIN.
- On or about November 15, 2018, STEWART sold CS-1 approximately 25 grams of heroin containing a detectable amount of fentanyl, supplied by Tony REDDING.
- On or about November 15, 2018, STEWART sold CS-1 approximately 61 grams of cocaine base, supplied by AUSTIN.
- On or about December 13, 2018, STEWART sold CS-1 approximately 59 grams of cocaine base, supplied by AUSTIN.
- On or about December 14, 2018, STEWART and Tony REDDING sold CS-1 approximately 100 grams of heroin containing a detectable amount of fentanyl, supplied by Barry MICKIEL.
- On or about January 2, 2019, STEWART and Tony REDDING sold CS-1 approximately 101 grams of heroin containing a detectable amount of fentanyl, supplied by Barry MICKIEL.
- On or about January 24, 2019, STEWART sold CS-1 approximately 125 grams of cocaine base, supplied by AUSTIN.
- On or about February 8, 2019, STEWART and Tony REDDING sold CS-1 approximately 149 grams of heroin containing a detectable amount of fentanyl, supplied by Frank REDDING.
- On or about March 8, 2019, STEWART and Tony REDDING sold CS-1 approximately 250 grams of heroin containing a detectable amount of fentanyl, supplied by Frank REDDING.

B. June 1, 2018 Narcotics Transaction

7. The FBI's investigation has relied, in part, on the assistance of a confidential source ("CS-1").² In or about May 2018, CS-1 reported that STEWART used telephone number (773) 329-8112 ("Target Phone 1")³ in connection with his narcotics trafficking activities.

8. As detailed below, on or about June 1, 2018, STEWART sold CS-1 approximately 27.4 grams of cocaine base supplied by Ramont AUSTIN.

1. Between on or about May 17, 2018 and on or about June 1, 2018, STEWART and CS-1 coordinated a narcotics transaction.

9. On or about May 17, 2018, at approximately 2:37 p.m., at the direction of law enforcement, CS-1 placed a voice call to STEWART over Target Phone 1. During the call, which was consensually recorded, CS-1 and STEWART discussed

² CS-1 has worked for FBI since in or around March 2016. CS-1 has prior traffic violations. As of July 15, 2020, CS-1 received approximately \$22,000 in monetary compensation for cooperation with the FBI, including approximately \$21,200 for assistance with this investigation. Law enforcement believes CS-1 to be a reliable source of information because information provided by CS-1 has been corroborated by intercepted communications and surveillance and has led to the seizure of narcotics and firearms.

³ The identification of STEWART as the user of Target Phone 1 is based, in part, on the following:

- a) Target Phone 1 was subscribed to Frederick STEWART at 345 E. 89th Place in Chicago, Illinois. Law enforcement records do not show this address as a known address of STEWART.
- b) During the recorded calls between CS-1 and the user of Target Phone 1, they arranged an in-person meeting, which took place on or about June 1, 2018. At that meeting, law enforcement observed interactions between CS-1 and an individual identified as STEWART through the use of a law enforcement booking photograph.
- c) Following the transaction on or about June 1, 2018, law enforcement compared the voice of STEWART from the June 1, 2018 transaction obtained through audio recording to the user of Target Phone 1 and confirmed that voice of the individual using Target Phone 1 matched STEWART's voice.

whether STEWART could sell quantities of narcotics to CS-1, as follows:

STEWART: Hello?

CS-1: What's goin' on?

...

STEWART: What's good, though?

CS-1: Hey, I know somebody that's looking for a new connect [source of supply].

STEWART: On what [kind of drugs]?

CS-1: Diesel [heroin].

STEWART: What, uh, like what? What they talkin' 'bout?

CS-1: He like, first he wanna, you know what I'm sayin', you know like give it to his people [drug customers] to see like how it work whatever First, wanna start with an ounce or whatever, then, if his people [drug customers] react good to it, then he gonna get a lot of shit [purchase larger quantities].

...

STEWART: I got a couple of motha fuckas [possible sources of supply] and I'm doin' some [selling some] . . . What he buyin'? Is it raw [powder cocaine]? Is it hard [crack cocaine]?

CS-1 He want it raw [powder cocaine].

STEWART: Oh, he want it raw [powder cocaine]. Okay.

...

STEWART: I can make shit happen for a mother fucker [facilitate a transaction], as long as they . . . I can't put a mother fucker on to a mother fucker that's a police or that I can't trust. . . So, I have to fuck with 'em myself a couple of times and see make sure shit is good and then, umm, take it from there

...

STEWART and CS-1 did not reach any specific agreement during this initial call, but they agreed to talk at a later time.

10. On or about May 25, 2018, at approximately 4:14 p.m., at the direction of law enforcement, CS-1 placed a voice call to STEWART over Target Phone 1. During the call, which was consensually recorded, CS-1 and STEWART continued to discuss whether STEWART could sell narcotics to CS-1. In particular, they discussed the following:

CS-1: What's goin' on? Did you take care of that [get a price for cocaine as previously discussed]?

. . .

STEWART: I can do it. I'm going to have to talk to someone in a little while . . . when you talkin about doin' it [making the purchase], though?

CS-1: Shit, as soon as possible. . . .

STEWART: So, first he [CS-1's customer] need a price right?

CS-1: Right. It's dry as fuck [the market is depleted] out west. Like, ain't nothing checkin' out west. And the shit they got out west is garbage [poor quality]. . . .

STEWART: If I call you back with a price, how long before you get the money? And then how long before you can bring it?

CS-1: Well, today, I really ain't doin' shit, so if you do it today, I probably can meet up with you today. But, tomorrow, I'm sure I ain't gonna be able to do it tomorrow. Sunday, Monday for sure.

STEWART: If you can do it for sure today, I'd rather do it today . . . because I got a lot a shit to do. But, listen, I'm gonna call you back. I'm gonna see . . . get a price . . .

11. That same day, CS-1 called STEWART over Target Phone 1. During the call, which was consensually recorded, CS-1 and STEWART had the following exchange:

STEWART: Yo.

CS-1: Yeah, what happened [regarding STEWART getting a price]?

STEWART: He [source of supply] said, 1350 [\$1,350], man, 13 [\$1,300]. I can probably get it for 13 [\$1,300].

CS-1: 13 [\$1,300]?

STEWART: Yeah, uh, he [source of supply] told me 1350 [\$1,350], but I can probably get it for 13 [\$1,300].

CS-1: Alright, 1350 [\$1,350].

STEWART and CS-1 then discussed when the transaction could take place and they agreed to talk at a later time to make the arrangements.

12. On or about May 29, 2018, May 30, 2018, and May 31, 2018, STEWART, using Target Phone 1, communicated with CS-1 through text messages regarding the anticipated buy of narcotics. For example, on or about May 31, 2018, CS-1 texted Target Phone 1, "Can't talk but meeting dude [the customer] in the morning to pick up the bread [money] then I'm meeting up with u." STEWART, using Target Phone 1, replied, "Yup."

2. On or about June 1, 2018, STEWART sold CS-1 approximately 27 grams of cocaine base, believed to be supplied by AUSTIN.

13. On or about June 1, 2018, at approximately 1:57 p.m., agents met with CS-1 at a predetermined location. Law enforcement searched CS-1 for contraband and excessive sums of money with negative results. Law enforcement also provided CS-1 with \$1,400⁴ in prerecorded FBI funds for the purchase of approximately one ounce of crack cocaine, and outfitted CS-1 with a concealed audio and video recording device.

14. On or about that same day, at approximately 2:30 p.m., at the direction of law enforcement, CS-1 placed a voice call to STEWART, who was using Target Phone 1. During the call, which was consensually recorded, CS-1 and STEWART continued their discussion regarding whether STEWART could sell a quantity of narcotics to CS-1:

STEWART: Hello?

CS-1: What up?

...

STEWART: What you talkin' about, you wanna meet me up? . . . I ain't gonna call him [source of supply] until I got the cash in my pocket and then where he at now and we take it from there?

CS-1: Right, so how long's that gonna be? You know, [customer]'s ass on my heels. You already know that.

⁴ After initially discussing a price of either \$1,350 or \$1,300, CS-1 spoke briefly with STEWART on or about May 30, 2018 by telephone in a call that was not recorded. According to CS-1, CS-1 forgot to engage the recording device provided to CS-1 by law enforcement. Law enforcement verified the occurrence of that call through toll records. According to CS-1, during that call, STEWART agreed to sell CS-1 approximately one ounce of crack cocaine for \$1,400. According to CS-1, CS-1 agreed to the slightly higher price so as not to arouse any suspicion on the part of STEWART.

STEWART: I don't know, I can't say. Five minutes, 10 minutes, it could be 20 minutes. It depends on where he [source of supply] at.

...

STEWART: I could call him [source of supply] and tell him [source of supply], uh, whatever, and see where . . . if he [source of supply] enroute, but at the same time, it ain't gonna be nothin' until . . . I need, uh, put the bread [cash] in my hand. Because he [source of supply] could be around the corner. Or he [source of supply] could be at home, downtown.

CS-1: Right.

STEWART: Either way it go, I can call him [source of supply] and see what it's lookin' like and how long if I, if he calls me like now . . . if you get up with me in the next 10 minutes or 20 minutes, I'm gonna ask him [source of supply] how long would it take for him [source of supply] to get up with me. I can do that.

...

STEWART: I can call him [source of supply] right quick and see how long before he [source of supply] can meet me and give me that [cocaine] . . .

CS-1: Alright, do that and hit me right back.

15. At approximately 2:50 p.m., CS-1 departed the law enforcement meeting location and proceeded to the 6300 block of South Bishop Street.⁵ Shortly thereafter, at the direction of law enforcement, CS-1 placed a voice call to STEWART over Target Phone 1. During the call, which was consensually recorded, CS-1 and STEWART

⁵ The references to general areas or blocks in this affidavit are approximate.

discussed that CS-1 was near the planned meeting location, which CS-1 understood to be on the 6300 block of South Bishop Street in Chicago,⁶ as follows:

STEWART: Hello?

CS-1: Yeah, umm, I'm pullin' up in like five minutes.

STEWART: Alright.

CS-1: You towards the end of the block, right?

STEWART: Yeah.

CS-1: Alright, I'm pullin' up. You know my car. I'll be there.

16. According to toll records, after CS-1 spoke with STEWART over Target Phone 1, at approximately 2:30 p.m., STEWART, using Target Phone 1, placed a call to a cellular telephone assigned telephone number (773) 559-6921 ("Target Phone 2"), used by AUSTIN.⁷

17. In anticipation of the in-person meeting between STEWART and CS-1, law enforcement established surveillance in and around the 6300 block of South Bishop Street. According to law enforcement conducting surveillance, CS-1 arrived at the planned meeting location at approximately 3:06 p.m. on June 1, 2018. Shortly

⁶ According to CS-1, prior to this transaction on June 1, 2018, CS-1 knew this location to be one of STEWART's residences.

⁷ Law enforcement later identified AUSTIN as the user of Target Phone 2 based on, among other things, the fact that following the numerous communications detailed herein between STEWART and the user of Target Phone 2 arranging the narcotics transaction that took place on or about November 15, 2018 (*see* Paragraphs 37 to 54), surveillance officers of the November 15, 2018 transaction recognized AUSTIN (based on a comparison to a known photograph) as arriving at and participating in the November 15, 2018 transaction. Moreover, as described below (*see* Paragraph 20), law enforcement identified AUSTIN Vehicle 1 during the June 1, 2018 transaction as registered to Ramont AUSTIN.

thereafter, surveillance officers observed STEWART⁸ get into the front passenger seat of CS-1's vehicle. Law enforcement surveillance captured STEWART entering CS-1's vehicle:



18. According to CS-1, after STEWART got into CS-1's vehicle, CS-1 handed STEWART \$1,400 in cash as payment for an ounce of crack cocaine. According to the audio/video recording device, CS-1 and STEWART also had the following exchange:

STEWART: Goddamn police man

CS-1: I see

STEWART: Fuck

⁸ Law enforcement identified STEWART by comparing the individual from the June 1, 2018 transaction with a law enforcement booking photograph of Frederick Stewart. Further, CS-1, who had known STEWART for a number of years, verified to law enforcement that the individual CS-1 met with, was in fact, STEWART. CS-1 has also identified STEWART and/or STEWART's voice in each of the available audio and video recordings of narcotics transactions described in this affidavit.

CS-1: Yo block hot ass fuck [surrounded by law enforcement]

STEWART: What goin on tho?

CS-1: Shit

STEWART: How ya been, G?

CS-1: Tired

STEWART: [laughter].

CS-1: thirteen fifty [\$1350.00]⁹?

STEWART: Fuck

CS-1: Yo block hot as fuck

...

[Sound of cash being counted is heard on the audio recording.]

STEWART: That's him [supplier] finna pull up.

19. According to agents conducting surveillance, at approximately 3:09 p.m., STEWART exited CS-1's vehicle and stood on the corner of 62nd Street and Bishop Street. According to toll records, immediately after STEWART left CS-1's vehicle, at approximately 3:09 p.m., STEWART, using Target Phone 1, placed a call to Target Phone 2.¹⁰

⁹ Based on my training and experience and my conversations with CS-1 following the transaction, I believe CS-1 was attempting to negotiate the price of the narcotics, but was unsuccessful. Law enforcement searched CS-1 following the transaction and did not find any excess U.S. currency.

¹⁰ According to toll records, between the date of CS-1's initial contact with STEWART, May 17, 2018, and the date of the controlled transaction, June 1, 2018, there were approximately 26 communications between Target Phone 1 and Target Phone 2, of which approximately four were text message communications.

20. At approximately 3:14 p.m., STEWART got into a black 2014 Lexus LS sedan with Illinois license plate AR25755, which was registered to Ramont Gean AUSTIN at 10114 South Luella Avenue, Chicago, Illinois 60617 (“AUSTIN Vehicle 1”).¹¹ AUSTIN Vehicle 1 was parked on the south side of 62nd Street, away from CS-1’s vehicle, which was parked on the north side of 62nd Street. A picture of AUSTIN Vehicle 1 taken by law enforcement surveillance shortly after STEWART exited AUSTIN Vehicle 1 is below:



21. A few minutes later, according to CS-1, STEWART then approached CS-1’s vehicle and handed CS-1 a white plastic bag through the front passenger side door of the vehicle.

22. At approximately 3:16 p.m., CS-1, while under constant law

¹¹ Law enforcement does not believe AUSTIN resided at the Luella Avenue address at the time of the June 1, 2018 transaction.

enforcement surveillance, departed the location to a predetermined location, where agents again searched CS-1 for contraband and excessive sums of U.S. currency, with negative results. CS-1 then gave law enforcement the white plastic bag that CS-1 received from STEWART. The bag contained what was later confirmed by DEA lab testing to be approximately 27.4 grams of cocaine base.

C. November 15, 2018 Transaction

23. As detailed below, on or about November 15, 2018, STEWART coordinated two narcotics transactions. First, STEWART coordinated the sale of approximately 24.9 grams of heroin containing a detectable amount of fentanyl from Tony REDDING to CS-1. Second, STEWART coordinated the sale of approximately 61.4 grams of cocaine base from AUSTIN to CS-1.

24. Based in part on the narcotics transaction that occurred on or about June 1, 2018, agents obtained court-authorization to intercept conversations over Target Phone 1 used by STEWART. Specifically, on or about November 5, 2018, Acting Chief Judge Matthew F. Kennelly signed an order authorizing the initial interception of wire and electronic communications over Target Phone 1, used by STEWART, for a period of 30 days. Interceptions over Target Phone 1 began on November 5, 2018.

25. On or about November 8, 2018, at approximately 5:49 p.m., STEWART using Target Phone 1, engaged in a text message conversation with CS-1.¹² During

¹² This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather as a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

the conversation, CS-1 asked STEWART to coordinate a sale of crack cocaine and heroin to CS-1. CS-1 texted, "I need a favor like frfr [for real for real]." STEWART texted, "What." CS-1 texted, "A mofo called me and need a 63 of c and a onion of AD like by midweek next week. [CS-1 asked STEWART to arrange for CS-1 to purchase 63 grams of crack cocaine, and 1 ounce of heroin]." STEWART texted, "Tll c." CS-1 texted, "Could you please I need this Lil money."

26. On or about November 14, 2018, at approximately 7:23 p.m., CS-1 met with STEWART at a McDonald's parking lot in Harvey, Illinois to discuss the narcotics transaction.¹³ Law enforcement surveilled the meeting. According to CS-1, STEWART informed CS-1 that the price of 63 grams of crack would be \$2,600 and that the price of heroin would be determined later.

1. On or about November 14 and 15, 2018, STEWART arranged with AUSTIN and REDDING to supply narcotics to CS-1.

27. On or about November 14, 2018, at approximately 7:49 p.m. (TP1, Session 1202), STEWART, using Target Phone 1, placed an outgoing call to AUSTIN, who was using Target Phone 2. During the call, STEWART asked AUSTIN, "Hey don't you remember . . . I have got that onion for that girl." [STEWART planned to sell an ounce of heroin to CS-1]. AUSTIN responded, "Yeah, yeah." STEWART continued, "She want me to get a tray for her in the morning man." AUSTIN asked, "She ordered a tray? STEWART replied, "Yeah, big tray 63." [CS-1 wanted to purchase 63 grams of

¹³ Although law enforcement equipped CS-1 with an audio/video recording device for this transaction, the device malfunctioned and the meet was not recorded.

crack]. AUSTIN responded, "Alright, shit. They want 2350 for that right now." [The wholesale price for the crack would be \$2,350]. AUSTIN asked, "What did you charge her, 25?" STEWART answered, "I told her uh I say 25. I remember you tell me 23 for 63." [STEWART told CS-1 that the price for 63 ounces of crack would be \$2,500].

28. STEWART continued, "Listen to this though. I kinda was scared, damn she say she wanted a G Dog Food, too." [CS-1 also wanted to purchase heroin]. AUSTIN responded, "But you know what though, I ain't gonna lie, they be out of town motherfuckers, they be coming for packages like that." [Individuals outside Chicago typically want to purchase larger quantities of narcotics]. AUSTIN continued, "You know who get that right?" [You know who has heroin to sell?] STEWART replied, "Who is that?" AUSTIN answered, "Tiger Woo." STEWART responded, "Ahh you know what damn. I forgot Tiger sure do." STEWART continued, "His number. You know his number?" AUSTIN answered, "Yeah, yeah." STEWART stated, "When you get a chance, text me. So listen though, can that happen though in the morning?" AUSTIN answered, "Shit yeah."

29. At approximately 7:59 p.m. (TP1, Session 1203), AUSTIN, using Target Phone 2, texted STEWART, who was using Target Phone 1, the telephone number "18729048109."

30. Later that day, at approximately 10:21 p.m. (TP1, Session 1207), STEWART, using Target Phone 1, placed an outgoing call to telephone number (872)

904-8109 (“Target Phone 3”), used by Tony REDDING.¹⁴ At the beginning of the call, STEWART stated, “Tiger.” Tony REDDING answered, “Who is this?” STEWART responded, “It’s Gage man, I was finna call the other number.” Tony REDDING answered, “What’s up (unintelligible) Gage? I already know what you talking about.” STEWART continued, “I said I need to see you face to face and uh talk some business, man. Uh, when you gone be around? I’m gone be around about an hour. What time where you gone at? You gone be around?” Tony REDDING responded, “Yeah, I’ll be around. I’m waiting on you.” STEWART replied, “Alright, well lock my number Tiger so when I call you I’m ready meet you somewhere.”

31. On or about November 15, 2018, at approximately 8:30 a.m. (TP1, Session 1224), STEWART, using Target Phone 1, placed an outgoing call to Target

¹⁴ Identification of Tony REDDING as the user of Target Phone 3 was based on, among other things, on the following:

- a) A voice comparison of the voice of the user of Target Phone 3 completed by a law enforcement officer familiar with Tony REDDING’s voice. Specifically, the law enforcement officer conducted a traffic stop of Tony REDDING on or about November 27, 2018. At the time of the stop, Tony REDDING was driving the red Dodge caravan described later in this Affidavit as “REDDING Vehicle 1” (see Paragraph 34), and provided the officer with identification confirming his identity as Tony REDDING.
- b) As detailed below, law enforcement surveillance of the November 15, 2018 controlled narcotics purchase by CS-1—which was coordinated in part between STEWART and the user of Target Phone 3—observed STEWART meet that day with the driver of the red Dodge caravan registered to Tony REDDING.
- c) Law enforcement investigation revealed that Tony REDDING is likely “Tiger Woo” as referenced in AUSTIN and STEWART’s November 14, 2018, 7:49 p.m. call (TP1, Session 1202). Tony REDDING responded to the name “Tiger” during the November 14, 2018, 10:21 p.m. phone call (TP1, Session 1207).
- d) No subscriber information was available for Target Phone 3. Based on my training and experience, I know that individuals involved in narcotics trafficking often use “burner” phones, or phones that they use for a short period of time and then discard, in an effort to avoid law enforcement detection.

Phone 3, believed to be used by Tony REDDING. Tony REDDING answered the call stating, “Gage, go ahead Gage.” STEWART responded, “Aye um when you get a chance why don’t you come holla at me on at the crib on Loomis?” Tony REDDING replied, “Ok, on that side? On the side street. You all want me to bring that [the heroin] with me?” STEWART answered, “Naw, cause I want to talk to you first.”

32. Based on my training and experience, the training and experience of other law enforcement officers involved in this investigation, and the content and context of the communication, I believe STEWART told Tony REDDING that he wanted to meet in person to discuss the planned heroin transaction.

33. At approximately 9:04 a.m. (TP1, Session 1225), AUSTIN, using Target Phone 2, called STEWART, who was using Target Phone 1. During the call, STEWART stated that CS-1 wanted to meet for the planned narcotics transaction. AUSTIN responded, “Aight.” STEWART stated, “I mean it’s up to you if you want to leave and then leave and come back and get it. Get the dollars. It’s up to you.” [STEWART told AUSTIN he could either collect the narcotics and then meet with STEWART and CS-1 or else meet with STEWART and CS-1 first and then collect the narcotics]. AUSTIN responded, “Right, ok. Say I get it. I finna get it first.” [AUSTIN told STEWART he would collect the narcotics before their meeting].

34. At approximately 9:07 a.m., law enforcement conducting surveillance at STEWART’s residence on the 1400 block of W. 62nd Street, in Chicago, Illinois,¹⁵

¹⁵ Law enforcement identified the address on the 1400 block of W. 62nd Street as an address believed to be used by STEWART based on the following: on or about June 26, 2018, the Honorable Ruben Castillo signed an order authorizing law enforcement to collect location

observed a red Dodge Caravan, bearing Illinois license plate 661639, registered to Tony REDDING, arrive at and park in front of the residence (“REDDING Vehicle 1”). At approximately that same time, 9:07 a.m. (TP1, Session 1230), STEWART, using Target Phone 1, received a call from Tony REDDING, who was using telephone number 773-886-4013.¹⁶ During the call, Tony REDDING stated, “I’m outside,” to which STEWART replied, “Aight.”

35. At approximately 9:08 a.m., law enforcement observed STEWART exit the front door of his residence on the 1400 block of W. 62nd Street, and enter the passenger side of REDDING Vehicle 1. At approximately 9:09 a.m., law enforcement observed STEWART exit REDDING Vehicle 1 and re-enter his residence.

36. Based on my training and experience, the training and experience of other law enforcement officers involved in this investigation, and the content and context of the communication, I believe that Tony REDDING drove to STEWART’s house and discussed with STEWART the planned narcotics transaction, as they had arranged in the previous 8:30 a.m. phone call.

information for Target Phone 1. Based on surveillance of STEWART, as well as phone location information that showed STEWART frequently at the W. 62nd residence overnight, law enforcement determined that STEWART resides, among other locations, at the W. 62nd Street address.

¹⁶ Voice identification of Tony REDDING as the user of the ‘4013 number is based on the same voice comparison described above with respect to Target Phone 3 in Footnote 14 of this affidavit. Additionally, law enforcement voice comparison analysis confirmed that the user of the ‘4013 number and Target Phone 3 appeared to be the same individual.

2. On or about November 15, 2018, STEWART sold CS-1 approximately 63 grams of cocaine base supplied by AUSTIN and approximately 26 grams of heroin supplied by Tony REDDING.

37. On or about November 15, 2018, at approximately 8:32 a.m., STEWART and CS-1 had the following text message exchange:

STEWART: How much of the other thing that you said you needed

CS-1: A ounce

STEWART: The other thing

CS-1: 63

STEWART: Ounce 1500

CS-1: Ok let me meet him I'll be to u in a hour

38. At approximately 9:40 a.m. (TP1, Session 1238), CS-1 called STEWART, who was using Target Phone 1. During the call, STEWART stated, "The onion dude [individual who would provide ounce of heroin], he on point. He waiting on me. The other dude, he like just getting his ass up and talking about whatever so I ain't guarantee, he might be got up and do what he doing. I'm gonna call and make sure, see, so I'm saying that it might be a little time. I don't know but I'm gonna make sure. Imma call you back before ugh, I'm gonna text you and let you know. Something anyway before. I finna to call him right now actually. Make sure he what the fuck and ask him. Let him know you en-route. You trying to get this shit you know, done like now."

39. Based on my training and experience, the training and experience of other law enforcement officers involved in this investigation, and the content and

context of the communication, I believe that STEWART was informing CS-1 that although Tony REDDING was ready to sell the heroin to CS-1 and STEWART, STEWART was unsure when AUSTIN would be ready to sell the crack to CS-1.

40. At approximately 9:43 a.m. (TP1, Session 1240), STEWART, using Target Phone 1, called CS-1 and told CS-1 to meet him at 62nd Street and Loomis Street, which is near STEWART's residence. At approximately 10:22 a.m. (TP1, Session 1242), CS-1 contacted STEWART to inform STEWART that CS-1 was en-route. CS-1 also confirmed for STEWART that CS-1 had the funds to purchase both the heroin and crack.

41. At approximately 10:10 a.m., CS-1 arrived at a predetermined meet location. Law enforcement searched CS-1 and CS-1's vehicle for illegal contraband or excess U.S. currency, with negative results. Law enforcement then provided CS-1 with approximately \$4,100 in FBI funds (\$2,600 for the crack cocaine purchase and \$1,500 for the heroin purchase) to purchase the narcotics and equipped CS-1 with a covert audio recording device.¹⁷

42. At approximately 10:24 a.m. (TP1, Session 1244), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using the '4013 telephone number. During the call, STEWART stated, "I'm finna go, I'm finna pull up around there and pull up in the lot and wait." Tony REDDING replied, "Y'all come get it and meet me right here at 69th and Loomis at the restaurant."

¹⁷ Although CS-1's vehicle was equipped with an audio/video recording device, the device malfunctioned. CS-1 had a separate audio device, which recorded the transaction.

43. At approximately 10:26 a.m. (TP1, Session 1246), STEWART, using Target Phone 1, placed an outgoing call to AUSTIN at Target Phone 2. During the call, AUSTIN asked whether CS-1 was there. STEWART responded that CS-1 was not there but was on the way. STEWART stated, “And then, but we gotta make another move down the street. And then I’m comin, I mean I’m comin right back here, so how long you need?” [STEWART told AUSTIN that CS-1 was en-route and then asked AUSTIN how much time he needed to prepare for the transaction.] AUSTIN responded, “Shit, really, I’m just waiting on where. I’m finna go pick it up right now and then I be ready.” [AUSTIN said he would be ready for the cocaine transaction on short notice]. STEWART replied, “Aight well uh, come on then. So, call me when you’re en route so I can . . . I’mma call you. Call me when you en-route.”

44. At approximately 10:42 a.m., law enforcement conducting surveillance observed a vehicle driven by CS-1 arrive in front of STEWART’s residence. Moments later, law enforcement observed STEWART exit the residence and enter the passenger side of CS-1’s vehicle. According to CS-1, after STEWART entered CS-1’s vehicle, CS-1 handed STEWART a paper bag containing the \$4,100 in FBI funds. The audio recording of the transaction appears to record the sound of counting money.

45. At approximately 10:43 a.m. (TP1, Session 1249), STEWART, using Target Phone 1, placed an outgoing call to REDDING at the ‘4013 number. During the call, Tony REDDING instructed STEWART to drive to a restaurant located at 69th Street and Loomis Street. Tony REDDING then asked whether CS-1 in fact wanted “what we talked about [heroin].” STEWART answered affirmatively.

46. At approximately 10:43 a.m., law enforcement surveillance observed CS-1's vehicle depart from STEWART's residence, with STEWART in the front passenger seat. At approximately 10:47 a.m., law enforcement observed CS-1 arrive at the restaurant on the 6800 block of South Loomis Street. At approximately 10:47 a.m. (TP1, Session 1250), STEWART, using Target Phone 1, and in the presence of CS-1, placed an outgoing call to Tony REDDING, who was using the '4013 number, informing Tony REDDING that STEWART had arrived.

47. At approximately 10:51 a.m., law enforcement observed REDDING Vehicle 1 arrive at the restaurant. Law enforcement then observed STEWART exit CS-1's vehicle and enter REDDING Vehicle 1. According to CS-1, prior to exiting CS-1's vehicle, STEWART removed \$1,500 in funds from the paper bag that CS-1 had previously provided to STEWART. At approximately 10:55 a.m., law enforcement observed STEWART exit REDDING Vehicle 1 and re-enter CS-1's vehicle. According to CS-1, STEWART then provided CS-1 a plastic bag containing suspect heroin. Both CS-1's vehicle and REDDING Vehicle 1 were observed departing the area moments later.

48. At approximately 10:57 a.m. (TP1, Session 1251), STEWART, using Target Phone 1, placed an outgoing call to AUSTIN, who was using Target Phone 2. During the call, STEWART stated, "Where you at, where you at? Just got back, I'm waiting on you man." AUSTIN responded, "Aight, I'm getting there as quick as I can. But I won't get there too fast."

49. At approximately 10:58 a.m., law enforcement surveillance observed AUSTIN exit his residence on the 8100 block of S. Dante in Chicago, Illinois¹⁸ and enter AUSTIN Vehicle 1.

50. At approximately 10:59 a.m., law enforcement observed CS-1's vehicle arrive back at STEWART's residence on W. 62nd Street, with STEWART still occupying the passenger seat of the vehicle.

51. At approximately 11:24 a.m., law enforcement observed AUSTIN Vehicle 1 arrive near the front of STEWART's residence. Law enforcement then observed STEWART exit CS-1's vehicle and enter AUSTIN's vehicle. According to CS-1, prior to exiting CS-1's vehicle, STEWART removed \$2,600 from the paper bag that CS-1 had previously provided to STEWART. At approximately 11:25 a.m., law enforcement observed STEWART exit AUSTIN's vehicle and re-enter CS-1's vehicle. According to CS-1, STEWART then provided CS-1 a bag containing suspect crack cocaine.

52. At approximately 11:26 a.m., STEWART exited CS-1's vehicle and departed on foot towards the entrance of STEWART's residence. CS-1 then departed and drove to a predetermined meeting location. At approximately 11:37 a.m., law enforcement searched CS-1 and CS-1's vehicle for contraband and excessive U.S. currency, with negative results. CS-1 was debriefed and the electronic audio/video recording equipment was deactivated. Law enforcement then obtained from CS-1 two

¹⁸ Law enforcement identified the 8100 S. Dante residence as used by AUSTIN based on vehicle registration records associated with AUSTIN's vehicle, as well as prior surveillance of AUSTIN.

plastic bags. The first plastic bag contained a substance that was later confirmed by DEA lab testing to be approximately 24.9 grams heroin with a detectable trace of fentanyl. The second plastic bag contained a substance that was later confirmed by DEA lab testing to be approximately 61.4 grams of cocaine base.

53. At approximately 2:09 p.m., CS-1 sent STEWART, who was using Target Phone 1, a text message stating, “It was short by 3 grams.” STEWART responded, “What was?” CS-1 answered, “D,” meaning, the heroin.¹⁹

54. At approximately 2:13 p.m. (TP1, Session 1276), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using the ‘4013 number. During the call, STEWART said, “Hey man, they said they was three G’s, three grams short man.” Tony REDDING responded, “Three grams short?” STEWART answered, “They just text me saying I’m like, I ain’t even respond yet. I just called straight called you, so I don’t know what the fuck.” Tony REDDING replied, “we make up for it next time they come back.” At approximately 2:26 p.m. (TP1, Session 1277), STEWART, using Target Phone 1, contacted CS-1 and informed CS-1 that STEWART would “make it back up.”

D. December 13, 2018 and December 14, 2018 Transactions

55. As described below, on or about December 13, 2018, law enforcement conducted a controlled purchase by CS-1 of approximately 59 grams of cocaine base from Ramont AUSTIN and Fredrick STEWART. Further, on or about December 14,

¹⁹ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather as a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

2018, law enforcement conducted a controlled purchase by CS-1 of approximately 101.3 grams of heroin from Tony REDDING and STEWART.

56. During the course of the investigation, and partly based on the above information, agents obtained court-authorization to intercept conversations over a number of phones used by STEWART, AUSTIN, and Tony REDDING. Specifically, on or about December 11, 2018, Chief Judge Ruben Castillo signed an order authorizing the renewed interception of wire and electronic communications over telephone number (773) 329-8112 (Target Phone 1), used by STEWART; the initial interception of wire communications over telephone number 773-559-6921 (Target Phone 2), used by Ramont AUSTIN; and the initial interception of wire communications over telephone number 872-904-8109 (Target Phone 3), used by Tony REDDING. Interceptions over Target Phone 1 began on December 11, 2018, and interceptions over Target Phone 2 and Target Phone 3 began on December 12, 2018.

1. On or about December 12, 2018 and December 13, 2018, STEWART and CS-1 communicated regarding a narcotics transaction.

57. On or about December 12, 2018, at approximately 10:43 p.m., CS-1 sent a text message to STEWART, using Target Phone 1, which read: “Need to bump into u & ur people tomorrow bout 12 12:30 got the \$2600 for the c [crack] need a price for the 63 of D [heroin] can it be done?” STEWART, using Target Phone 1, responded, “Call me when you can.”²⁰

²⁰ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather as a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

58. At approximately 11:28 p.m., (TP1, Session 2871), CS-1 called STEWART, who was using Target Phone 1. During the call, STEWART stated, “Everything stay the same, everything stay the same, all the numbers and all that. So, I’m going to see if he responds back and forth.” CS-1 responded, “It’s more than last time, that’s what I text you.” STEWART replied, “It was more, no it wasn’t, it was the same.” CS-1 responded, “Yea, no he [the customer] want more.” CS-1 elaborated, “So you know you got to get the price, put your cut in there. I know your cut stay the same for the other one.” STEWART stated, “Okay so so he [the customer] want double what he had.”

59. On or about December 13, 2018 at approximately 8:25 am, CS-1 texted STEWART, using Target Phone 1, “What happened.” STEWART responded via text, “I talked to both of them I’m waiting now from their response.”²¹

2. On or about December 13, 2018, STEWART coordinated with AUSTIN and Tony REDDING to supply narcotics to CS-1.

60. At approximately 8:26 a.m. (TP2, Session 87), STEWART, using Target Phone 1, called Ramont AUSTIN, who was using Target Phone 2. During the call, STEWART asked AUSTIN, “How soon can I get that trey [63 grams of crack]?” AUSTIN responded, “Umm, shit, trey?” STEWART replied, “Yup. They. They back.

²¹ As above, this communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather as a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

[CS-1 and his/her purchaser wanted to conduct another transaction].” AUSTIN responded, “Uh, uh, I’ll make, I’ll call and see what’s up.”

61. At approximately 8:45 a.m. (TP1, Session 2928), STEWART, using Target Phone 1, called Tony REDDING, who was using Target Phone 3. During the call, STEWART asked Tony REDDING, “Dog, umm, can I get a 63rd? [63 grams of heroin]?” Tony REDDING responded, “When?” STEWART replied, “When is the soonest I can get it?” Tony REDDING asked “On the white seat? [do you want cocaine?]” STEWART responded, “Naw on what what you, what I, let, I talked with you about.” [STEWART explained that he wanted heroin, not cocaine]. Tony REDDING asked, “Oh, ok, ok, ok. When you ready?” STEWART answered, “Umm [the customer] steady calling me now. Called me this morning. Called me last night. Called me just now. Texted me like what’s up? I guess they wanna know when, what’s the soonest I can get it? And what’s that number [price]?” Tony REDDING responded, “They want the same thing right?” STEWART stated, “I said a ugh double that, 63, a trey of that dog [63 grams of heroin].” Tony REDDING responded, “Ok. They want two of em?” STEWART answered, “I guess, that’s what a 63. Yeah.” Tony REDDING responded, “Aight. Let me go get it. Give me a minute let me get it.” STEWART asked, “What, what what will be the price be so I can let them know. Oh or don’t until you pay em?” Tony REDDING responded, “Shit, I’mma go see now. Give me a few minutes. Give me about ten, twenty minutes.” STEWART responded, “Aight.” Tony REDDING stated, “I’ll go get it right quick. I’mma see what’s going on.” STEWART responded, “Aight.”

62. At approximately 8:58 a.m. (TP1, Session 2929), Tony REDDING, using Target Phone 3, called STEWART, who was using Target Phone 1. During the call, Tony REDDING stated, “Hey the last time they came right, they [the customer] got 25. I need to know exactly what they trying, how much they got and what they trying to get. Like they want 45 or 50 or a 100? You know what I mean?” [Tony REDDING asked STEWART to clarify the quantity of heroin that CS-1’s customer wanted to purchase]. STEWART responded, “They said 63 [63 grams].” Tony REDDING replied, “They want 63? That that, I don’t understand that? You feel me? That’s what I’m saying Gage. I have dope [heroin].” STEWART asked, “It don’t come like that you saying?” Tony REDDING responded, “Nah it don’t come like that, that won’t be. That’s, that’s coke. That’s the white girl talk, you know, that’s speed ball.” [Tony REDDING explained that the quantity of narcotics that STEWART was requesting on behalf of CS-1 did not make sense because Tony REDDING was selling heroin, not cocaine, which is not typically sold in packages of 63 grams, unlike cocaine].

63. Tony REDDING continued, “So I gotta know, huh?” STEWART responded, “Let me see right quick?” Tony REDDING replied, “Right. Say 50, 25, 25 what they came and got that first time. You know maybe.” STEWART responded, “That’s probably what they [the customer] want.” Tony REDDING stated, “If they [the customer] mean double, that’s like 50. You know that’s 50. You see what I’m saying? That’s like, that’s almost, damn near \$3,000. What would they pay last time? \$1,400?” STEWART responded, “Yeah.” Tony REDDING stated, “Yeah, that’s what like 28, \$2,800. You know what I mean?” [Tony REDDING explained that the price for 50

grams would be around \$2,800]. STEWART responded, "Aight," Tony REDDING asked, "You feel me?" STEWART responded, "Let me call you back."

64. At approximately 9:00 a.m. (TP1, Session 2930), CS-1 placed a call to STEWART, who was using Target Phone 1. During the call, STEWART stated, "Said umm, how do I say this? The other, the other move [heroin] that that that uh you'll had got the little the first move the ounce?" CS-1 responded, "Uh huh?" STEWART stated, "It don't come like that. It comes in 50s and 20s, 20. You know what I'm saying? So whatcha want you wanna do 50?" [STEWART explained to CS-1 that heroin could not be purchased in packages of 63 grams, unlike cocaine]. STEWART continued, "He [Tony REDDING] said that's gonna be like like double like last time, like 3." [STEWART told CS-1 that the price for the heroin would be \$3,000]. CS-1 responded, "Ok, let me call him." [CS-1 will call his/her customer]. STEWART stated, "Aight let me call ugh him back and tell him you talking about that 50." [STEWART told CS-1 that STEWART would contact Tony REDDING to clarify that CS-1 wanted to purchase 50 grams of heroin].

65. At approximately 9:01 a.m. (TP1, Session 2931), STEWART, using Target Phone 1, called Tony REDDING, who was using Target Phone 3. During the call, STEWART stated, "They [the customer] say yeah. That's that ugh that 5-0 but . . ." Tony REDDING interrupted, "Oh 50, ok. I was wondering cause that's how you know that's how they come." STEWART stated, "Right. She didn't know." [STEWART told Tony REDDING that CS-1 wanted to buy 50 grams of heroin, not 63, as he had previously said]. Tony REDDING responded, "It's all good." STEWART stated, "This

her right now, this her now hold on.” [STEWART informed Tony REDDING that he was receiving a call from CS-1].

66. STEWART, using Target Phone 1, then switched the call over to CS-1. During the call, CS-1 stated, “Ok I had it wrong. I had it wrong.” CS-1 continued, “A 63 of the other shit. Then he [the customer] said ask dude can he do a 100 for 5?” STEWART replied, “Shit. A 100 for 5?” CS-1 responded, “Yeah he [the customer] want a 63 of the other shit.” STEWART replied, “And a hundred, a hundred for G for five. Hold on.” [CS-1 told STEWART that CS-1’s customer wanted 63 grams of crack, and was willing to pay \$5,000 for 100 grams of heroin].

67. STEWART, using Target Phone 1, then switched the call back to Tony REDDING, who was using Target Phone 3. During the call, STEWART stated, “Now this motherfucker talking about she had it wrong. He [CS-1’s customer] said, he, could he get that 100 for 5.” [CS-1’s customer wants 100 grams of heroin for \$5,000]. Tony REDDING responded, “They [the customer] want a 100 for 5?” STEWART stated, “That ain’t no room for me, so what happened, so that’s a damn lot.” [STEWART felt that he would not make a profit at that price]. Tony REDDING, responded, “He got 5Gs. God damn. Yeah, he trying to get him a cut.” STEWART stated, “He trying to get him a cut?” Tony REDDING responded, “He trying to get him a play. It’s right at Christmas. Everybody wanna deal.” [Tony REDDING believed that CS-1’s customer planned to resell the heroin for a steep profit]. Tony REDDING continued, “Tell him to give me, tell him to give me instead of 65 tell him to give me 6 [thousand] and we gonna run with it. Me and you gonna run with it. We almost cut you make sure you

have it. Tell him to give me 6.” [Tony REDDING told STEWART to tell CS-1 that they could do the deal for 100 grams of heroin for \$6,000].

68. STEWART, using Target Phone 1, then switched the call back to CS-1. During the call, STEWART stated, “That move that your cut he overboard he said man he can do 6. That’s it and and then he gotta make sure he got enough but he at 6 that’s what he can do.” [STEWART told CS-1 that Tony REDDING would sell the 100 grams of heroin to CS-1 for \$6,000]. CS-1 responded, “Ok.” STEWART added, “And I ain’t even putting nothing on that myself [STEWART would not be making a profit] so that’s just getting my little cut out of out that.” CS-1 responded, “Ok. Let me, I’m sure he gonna ok but let me call him.” [CS-1 would go check with his/her customer to confirm the deal].

69. STEWART, using Target Phone 1, then switched the call back to Tony REDDING, who was using Target Phone 3. During the call, STEWART stated, “She [CS-1] gonna call me call me back and let me know but ugh she finna to go make that move. She said she knows most likely he gonna say yeah.” Tony REDDING responded, “But I still gotta go get it [still need to retrieve the heroin]. You know? Ain’t no problem let me know.”

70. At approximately 9:06 a.m. (TP1, Session 2934), STEWART, using Target Phone 1 received a call from CS-1. During the call, CS-1 told STEWART, “Yeah he [the customer] said ok. That’s a go. He [the customer] said, tell them don’t forget last time, he shorted him. The 3 ounces and um, what dude talking about [price] for the 63?” [CS-1’s customer agreed to pay \$6,000 for 100 grams of heroin but wanted to

know the price for 63 grams of crack. CS-1's customer also wanted CS-1 to remind STEWART that Tony REDDING had shorted him during their last transaction]. Later in the call, CS-1 asked again, "Yeah, get me the price for the C [crack]." STEWART responded, "That was 26 [\$2,600] still. That was still 26 [\$2,600]. I'm waiting on him to get it [waiting on AUSTIN to obtain the cocaine for sale]."

71. At approximately 9:17 a.m. (TP1, Session 2935), STEWART, using Target Phone 1, received a call from Tony REDDING, who was using Target Phone 3. During the call, Tony REDDING stated, "I got the price wrong. Tell em 5-6. It's gonna be 5-6 [\$5,600] instead of 6 [\$6,000]. STEWART responded, "Aight. And listen. Then I forgot to tell you, that she said uh, you don't forget about them, them, them, what you short them 3 grams last time." Tony REDDING responded, "Right. It was a couple grams. Don't worry about it. Imma throw something in there. Tell her to bring that 56 [\$5,600] right on. We got her."²²

72. At approximately 10:37 a.m. (TP2, Session 91), STEWART, using Target Phone 1, received a call from AUSTIN, who was using Target Phone 2. During the call, AUSTIN stated, "Yeah. Shit, uh, just got up with dude [supplier]. I'm finna, uh, probably gonna get it [cocaine] in a minute, um, when that [the transaction with CS-1] be ready?" STEWART responded, "She was waiting on, um, on you and waiting on the

²² Although Tony REDDING told STEWART to reduce the price for purchase of the heroin, according to CS-1, STEWART did not communicate the reduced price to CS-1. Instead, at approximately 10:43 a.m., CS-1 texted STEWART, "He saying all he got is \$8500 [instead of \$8600 for both the heroin and crack as previously agreed] right now would they take that for both if not can dude for the 2600 be ready next week." This represented a \$100 reduction in the previously-agreed upon price for the heroin. As described below, Tony REDDING accepted the reduced price because he gave CS-1 the narcotics after counting the money.

other move. So, I'm waiting, so I guess um, it's on you. How long you think before you ready to come this way?" AUSTIN responded, "Uhhhh, shit, cuz they want already done right [they want crack cocaine rather than powder cocaine]?" STEWART stated "Just like last rip [just like last time]." STEWART asked, "You got enough of that?" AUSTIN responded, "Yeah. Yeah, that part don't take long." STEWART replied, "Ok then, that's what I'm saying, so yeah, when you get through doing that. Just let me know."

3. On or about December 13, 2018, STEWART and AUSTIN sold CS-1 approximately 59 grams of cocaine base.

73. At approximately 4:19 p.m. (TP1, session 2963), STEWART, using Target Phone 1, received a call from CS-1. During the call, STEWART and CS-1 agreed to meet near 88th Street and Carpenter Street.

74. At approximately 4:20 p.m. (TP2, Session 106), STEWART, using Target Phone 1, placed an outgoing call to AUSTIN, who was using Target Phone 2. During the call, STEWART stated, "Over here on Carpenter." AUSTIN replied that he would meet STEWART after picking up his children. STEWART responded, "You should have just dropped it [the cocaine] off to me man I should have just said that earlier." AUSTIN asked, "She [CS-1] on her way tho?" STEWART replied, "Yeah, she on her way."

75. At approximately 4:49 p.m., CS-1 met with law enforcement at a predetermined location, where CS-1 was searched for contraband or excess currency with negative results. Law enforcement then provided CS-1 with approximately

\$8,500 (\$2,600 for the purchase of crack cocaine and \$5,900 for the purchase of heroin) in FBI funds and equipped CS-1's vehicle with a covert audio/video recording device.

76. At approximately 5:10 p.m. (TP1, Session 2976), STEWART, using Target Phone 1, received a call from CS-1. During the call, STEWART told CS-1 where to stop the vehicle driven by CS-1.

77. At approximately 5:20 p.m., law enforcement surveillance observed a vehicle driven by CS-1 arrive in front of a residence near 88th Street and Carpenter Street in Chicago. Moments later, law enforcement observed STEWART exit the Carpenter residence and enter the passenger side of CS-1's vehicle. According to CS-1, and as seen on the covert in-car surveillance camera, CS-1 handed STEWART a black plastic bag containing the \$8,500 in FBI funds comprised of \$5,900 for the purchase of heroin and a brown paper bag containing \$2,600 for the purchase of crack cocaine. Between approximately 5:30 p.m. and 5:50 p.m., as heard on the covert audio/video recording device, STEWART and CS-1 discussed, among other things, the logistics of narcotics transactions and difficulties with STEWART's sources of supply.

78. At approximately 5:51 p.m. (TP2, Session 110), STEWART, using Target Phone 1, received a call from AUSTIN, who was using Target Phone 2. During the call, AUSTIN told STEWART, "I'm out here." STEWART responded, "I'm out here too."

79. At approximately 5:53 p.m. law enforcement observed AUSTIN Vehicle 1 arrive and park on Carpenter, north of the vehicle driven by CS-1. According to CS-1, and as seen on the in-car camera, before exiting CS-1's vehicle, STEWART removed the \$2,600 in funds from the bag that CS-1 had previously provided to STEWART.

Subsequently, surveillance observed STEWART exit CS-1's vehicle and enter AUSTIN Vehicle 1.

80. At approximately 5:55 p.m., law enforcement observed STEWART exit AUSTIN Vehicle 1 and re-enter the vehicle driven by CS-1. According to CS-1, STEWART then provided CS-1 with a plastic bag containing suspect crack cocaine. A sound of a plastic bag can be heard on the covert audio/video recording device. Between approximately 5:55 p.m., and 6:50 p.m., CS-1 and STEWART remained in CS-1's vehicle waiting for a transaction with Tony REDDING, which ultimately did not occur that night.

81. At approximately 6:53 p.m., law enforcement surveillance observed STEWART exit the vehicle driven by CS-1 and re-enter the Carpenter residence. While under constant surveillance, CS-1 then drove to a predetermined meeting location where, at approximately 7:00 p.m., CS-1 was debriefed and the electronic audio and video recording equipment was deactivated. Law enforcement obtained from CS-1 a plastic bag containing a substance that was later determined by DEA lab testing to be approximately 59.4 grams of cocaine base. CS-1 was searched for contraband and excess United States currency, with negative results.

4. On or about December 14, 2018, STEWART and Tony REDDING sold CS-1 approximately 101 grams of heroin, supplied by Barry MICKIEL.

82. On or about December 13, 2018, at approximately 6:51 p.m. (TP3, Session 715), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, Tony REDDING told

STEWART he would not have the heroin ready for the transaction until the following morning.

83. Between approximately 6:00 p.m. and 11:27 p.m., Tony REDDING, using Target Phone 3 communicated with Frank REDDING, who was using 312-438-6907 (“Target Phone 6”)²³, by text message approximately 26 times (TP3, Sessions 687, 698, 745, 792-809, 818-822).²⁴ Each of text messages occurred at or around the time that Tony REDDING communicated with Fredrick STEWART regarding the availability of 100 grams of heroin, as ordered by CS-1. Based on my training and experience, my knowledge of this investigation and the individuals under investigation, and the content and context of the communication described below, I believe that Tony REDDING attempted to secure the 100 grams of heroin, as ordered by CS-1, from his brother Frank REDDING.

84. At approximately 11:12 p.m. (TP1, Session 3043), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, STEWART stated, “They [the customer] said about two

²³ Frank REDDING has been identified as the user of Target Phone 6 based on the following:

- a) On or about December 31, 2018, at approximately 10:04 p.m. (TP3, Session 7035), Tony REDDING, using Target Phone 3, received a call from the user of Target Phone 6. During the call, Tony REDDING referred to the user of Target Phone 6 as his “big brother.” Similarly, on multiple calls, including during a call over Target Phone 3 on or about January 5, 2019, at approximately 7:45 p.m. (TP3, Session 9033), the user of Target Phone 6 referred to Tony REDDING as his “lil bro.” Based on a search of publicly available records, Frank REDDING is the older brother of Tony REDDING.
- b) Law enforcement agents spoke with Frank REDDING in 2018 and 2019. Those law enforcement agents compared his voice to the voice of the individual using Target Phone 6, and confirmed that it is the same individual.

²⁴ The government does not have the contents of these text messages.

o'clock. They seem mad, they seem real disappointed and whatever. And if it ain't gonna be tomorrow then they ain't gonna fuck with it no more." [STEWART told Tony REDDING that CS-1's customer was upset that Tony REDDING had not obtained the heroin in time to conduct the transaction that day, and warned that if the heroin transaction did not take place the next day, the deal would be off]. Tony REDDING responded, "It's gonna be tomorrow, Gage."

85. On or about December 14, 2018 at approximately 8:39 a.m., STEWART, using Target Phone 1, engaged in the following text message conversations with CS-1. During the conversation, CS-1 texted, "Ask dude [Tony REDDING] if he be ready at 2 I can't wait around . . ." STEWART responded via text, "He said it's gonna be all good."²⁵

86. At approximately 10:19 a.m. (TP1, Session 3078), STEWART, using Target Phone 1, received an incoming call from Tony REDDING, who was using Target Phone 3. During the call, STEWART confirmed with Tony REDDING that Tony REDDING would be prepared to conduct the heroin transaction at 2:00 p.m. Tony REDDING confirmed that he would.

87. At approximately 12:14 p.m. (TP3, Session 1029), Tony REDDING, using Target Phone 3, placed an outgoing call to telephone number 312-852-4209 ("Target Phone 5"), used by Barry MICKIEL.²⁶ During the call, Tony REDDING asked

²⁵ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather than a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

²⁶ Identification of Target Phone 5 as used by MICKIEL is based, among other things, on subscriber records for a Facebook account with display name "Steve Mickiel." That account

MICKIEL, “What time you would be in there area.” MICKIEL responded, “I’m here already,” to which Tony REDDING responded, “Here I come.”

88. Based on my training and experience, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, I believe that Tony REDDING contacted his heroin supplier, MICKIEL, to discuss the narcotics transaction.

89. At approximately 1:50 p.m. (TP1, Session 3095), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, STEWART stated that CS-1 was on the way and that STEWART had told CS-1 to meet him on 69th Street and Loomis.” Tony REDDING stated, “And Loomis?” STEWART responded, “That’s where it was last time right [where they had previously met to conduct the prior heroin transaction]?” Tony REDDING answered, “That’s where we met last time but me and you gonna have to go get it Gage.” [Tony REDDING told STEWART that they would have to collect the heroin from Tony REDDING’s supplier]. STEWART responded, “Go and get it? Damn. You ain’t even got it yet?” Tony REDDING replied, “Naw. They don’t wanna give it to me like that. They told me that we gotta go pick it up. We ain’t gotta go far.” STEWART responded, “Aight well we need to do that now then dog. Cuz she’s gonna,

is associated with Target Phone 5. Law enforcement has compared publicly available photographs on the “Steve Mickiel” Facebook account with known photographs of MICKIEL and confirmed that they are the same individual. Additionally, during subsequent transactions involving Tony REDDING and the user of Target Phone 5, including on or about January 2, 2019, law enforcement compared the individual who met with Tony REDDING with a known law enforcement booking photograph of MICKIEL and determined it was the same person. No subscriber information was available for Target Phone 5.

she'll be here in a minute." Tony REDDING responded, "They wanna make sure the money right big bro." [Tony REDDING said his supplier wanted to see the money before releasing the heroin]. STEWART answered, "Oh man. I dunno. Hold on. Imma call her back man. I dunno about all that shit. That's that you saying too much. See I dunno if a motherfucker gonna get they money and go and come back, man. Know what I'm saying? That's, that's, you know." [STEWART said he was unsure if CS-1 would agree]. Tony REDDING stated, "We right around the area where it's at. It just. They just trying to make sure the money right. Ain't no big thang."

90. At approximately 1:53 p.m. (TP1, Session 3096), STEWART, using Target Phone 1, placed an outgoing call to CS-1. During the call, STEWART told CS-1, "Now you just, just meet me at my old, at, uh, uh, on Loomis. At my crib over there. 63rd. 62nd. But listen. This motherfucker talking about uh, um, we gotta go. The place is, where it's at is around the corner. They wanna, they wanna check the money." [STEWART told CS-1 to meet him near 63rd Street and Loomis Street in Chicago and cautioned CS-1 that Tony REDDING's supplier wanted to see the money before releasing the heroin]. CS-1 replied, "Let me, um. Let me call him right now and see if, he want me to trust handing his money off." [CS-1 said that CS-1 would contact his/her customer to see if the customer was willing to allow CS-1 to provide the money before seeing the heroin]. STEWART replied, "Ain't like I'm finna take it and you ain't never gonna see me again and I ain't gonna let them touch your money. . . But it's on you though. So just call me and let me know what he wanna say."

91. At approximately 1:55 p.m., CS-1 met with law enforcement at a predetermined location. Law enforcement searched CS-1 for contraband or excess currency with negative results. Law enforcement also provided CS-1 with approximately \$5,900 in FBI funds and equipped CS-1's vehicle with a covert audio/video recording device.

92. At approximately 1:58 p.m. (TP1, Session 3097), STEWART, using Target Phone 1, received an incoming call from CS-1. During the call, CS-1 told STEWART that CS-1's customer was fine with STEWART counting the money before obtaining the heroin, but would not agree to allow STEWART to take the money to another location without CS-1.

93. At approximately 1:59 p.m. (TP1, Session 3099), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, STEWART relayed CS-1's position to Tony REDDING regarding the money. Tony REDDING agreed and they planned to meet with CS-1 near Loomis Street to count the money CS-1 was bringing to purchase heroin.

94. At approximately 2:02 p.m. (TP1, Session 3100), STEWART, using Target Phone 1, received a telephone call from CS-1. During the call, STEWART told CS-1 that Tony REDDING had agreed to CS-1's terms and asked CS-1 to meet him at his home near W. 62nd Street and Loomis Street. CS-1 agreed and told STEWART that he/she would be there in 10 minutes.

95. At approximately 2:17 p.m., law enforcement surveillance observed a vehicle driven by CS-1 arrive in front of STEWART's residence. Moments later, law

enforcement observed STEWART exit the residence on foot and enter the front passenger side of CS-1's vehicle. Between approximately 2:20 p.m. and approximately 2:30 p.m., as heard on the covert audio/video recording device, CS-1 and STEWART discuss, among other things, the difficulties associated with receiving the narcotics from STEWART's source.

96. At approximately 2:30 p.m., law enforcement surveillance observed REDDING Vehicle 1 arrive at STEWART's residence. Upon Tony REDDING's arrival at the residence, law enforcement observed Tony REDDING²⁷ exit REDDING Vehicle 1 and enter the rear passenger side of CS-1's vehicle. According to CS-1 and as seen on the covert in-car audio/video recording, STEWART handed Tony REDDING the money and STEWART and REDDING proceeded to count it. After counting the money, Tony REDDING instructed CS-1 and STEWART to follow him to another location. As heard on the audio/video recording device, REDDING stated, "I give em the money, we get the dope, y'all pull off" in response to STEWART's question about next steps. Tony REDDING and STEWART then exited CS-1's vehicle and entered separate vehicles.

97. At approximately 2:43 p.m. (TP3, Session 1107), Tony REDDING, using Target Phone 3, placed an outgoing call to MICKIEL, who was using Target Phone 5. During the call, Tony REDDING stated, "Get it ready for me." MICKIEL replied, "Aight."

²⁷ Law enforcement identified Tony REDDING by comparing a booking photograph of Tony Redding with the individual who met with CS-1 and STEWART. Further, REDDING exited REDDING Vehicle 1, which was registered to Tony Redding.

98. Based on my training and experience, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, I believe that Tony REDDING contacted MICKIEL, to inform MICKIEL that he was currently en route to retrieve the heroin.

99. While under constant surveillance, law enforcement observed CS-1, STEWART, and Tony REDDING drive separately in each of their vehicles from the location on 62nd Street and Loomis Street to a house on 59th Street and Union Street in Chicago, Illinois.

100. At approximately 2:53 p.m. (TP3, Session 1111), and prior to Tony REDDING's arrival at 59th Street and Union Street, Tony REDDING, using Target Phone 3, placed an outgoing call to MICKIEL, who was using Target Phone 5. During the call, MICKIEL stated, "Yeah, Tiger." Tony REDDING replied, "Open the door."

101. At approximately 3:03 p.m. (TP3, Session 1120), and shortly after Tony REDDING arrived at the location in the area of 59th Street and Union Street, Tony REDDING using Target Phone 3, received an incoming call from MICKIEL, using Target Phone 5. During the call, Tony REDDING stated, "Here I come B." MICKIEL then asked, "That car ain't with you is it?" Tony REDDING responded, "Uh uh." MICKIEL continued, "That car behind you." Tony REDDING replied, "That with Gerald ain't it?" MICKIEL responded, "Naw, that a burgundy car pulled up. I thought they came in with you." Tony REDDING replied, "Naw, them people ain't with me. I don't even know who the fuck that is." MICKIEL replied, "Alright." Tony REDDING asked, "You want to check to see who it is?" MICKIEL responded, "No, some new

people moved in next door. I don't know." Tony REDDING asked, "You want me to have Gerald come get the bag?" MICKIEL answered, "No, come on."

102. Based on my training and experience, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, I believe that Tony REDDING called MICKIEL to inform him that he had arrived to obtain the heroin. MICKIEL responded by asking Tony REDDING to confirm that he had not been followed. Tony REDDING assured MICKIEL that he had not. Tony REDDING then asked MICKIEL if MICKIEL would prefer if an unknown individual named "Gerald" came to Tony REDDING's car to retrieve the money. MICKIEL responded that he was fine with Tony REDDING coming into the house himself to exchange the money for the heroin.

103. At approximately 2:52 p.m., law enforcement surveillance observed Tony REDDING exit his vehicle and enter the rear of MICKIEL's residence at 722 W. 60th Street,²⁸ while CS-1 and STEWART remained outside in CS-1's vehicle. Moments later, at approximately 2:53 p.m., law enforcement observed Tony REDDING depart from the rear of the residence and enter CS-1's vehicle. According to CS-1 and as heard on the covert audio/video recording device, Tony REDDING then handed CS-1 a black plastic bag. At approximately 2:55 p.m., law enforcement observed Tony REDDING return to his vehicle. Subsequently, Tony REDDING, STEWART, and CS-1 departed the area in their respective vehicles.

²⁸ 722 W. 60th Street is listed as MICKIEL's address on public source reports and on MICKIEL's drivers' license. Further, during the January 2, 2019 transaction, law enforcement surveillance observed MICKIEL in the front door meeting with Tony REDDING.

104. While under constant surveillance, CS-1 drove to a predetermined meeting location where, at approximately 3:08 p.m., CS-1 was debriefed and the electronic audio and video recording equipment was deactivated. Law enforcement obtained from CS-1 a substance that was later confirmed by DEA lab testing to be approximately 100.2 grams of heroin with a detectable amount of fentanyl. CS-1 was searched for contraband and excess United States currency, with negative results.

5. Following the December 14, 2018 transaction, Tony REDDING discussed with Frank REDDING the December 14, 2018 heroin transaction and future heroin transactions.

105. On or about December 15, 2018, at approximately 5:07 p.m., (TP3, Session 1647), Tony REDDING, using Target Phone 3, received a call from Frank REDDING, who was using Target Phone 6. During the conversation, Frank REDDING stated, “Come on make me happy baby.” Tony REDDING responded, “Believe me, I try to make it happen yesterday [tried to get the narcotics supply from you].” Frank REDDING stated, “I know Steve [Barry MICKIEL]²⁹ told me you cashed him out baby.” To which Tony REDDING responded, “Yeah, I tried to make it happen yesterday. You thought it was a joke. You must didn’t have it. [Frank REDDING didn’t have the 100 grams ordered by CS-1].” Frank REDDING stated, “Naw, I didn’t

²⁹ Law enforcement believes that “Big Steve” is MICKIEL’s nickname based in part, on the fact that the account associated with MICKIEL (Target Phone 5) is also associated with a Facebook account with the display name “Steve Mickiel.” Law enforcement has compared publicly available photographs on the “Steve Mickiel” Facebook account with known photographs of MICKIEL and confirmed that they are the same individual. Further, MICKIEL’s Illinois drivers’ license indicates his full name is “Barry S. Mickiel.” Based on MICKIEL’s Facebook page, law enforcement believes the “S” stands for “Steve.”

have it.” Tony REDDING responded, “I kind of figured. I said this ain’t like you.” Frank REDDING stated, “I was tryin to get it.” Tony REDDING then responded, “I believe you. I said this isn’t like you baby. I don’t believe this shit, that’s fucked up.”

106. Based on my training and experience, the training and experience of other law enforcement officers involved in the investigation, and the content and context of the communication, I believe that Frank REDDING told Tony REDDING that he heard that Tony REDDING conducted a controlled narcotics purchase with “Big Steve,” a street name known to law enforcement to be used for MICKIEL. Tony REDDING then told Frank REDDING that he tried to conduct the narcotics transaction with Frank REDDING. Frank REDDING confirmed to Tony REDDING that he did not have the 100 grams of heroin ordered by CS-1 for then December 14, 2018 transaction.

107. On or about December 31, 2018, at approximately 10:01 p.m. (TP3, Session 7035), Tony REDDING, using Target Phone 3, received a call from Frank REDDING, who was using Target Phone 6. During the call, Tony REDDING and Frank REDDING first discussed the use of firearms against rival gang members.

108. Frank REDDING then changed the subject and stated, “Hell yeah. Whatchu doin?” Tony REDDING responded, “Shit ready for another one [re-up of 100 grams].” Frank REDDING asked, “Ready ready?” Tony REDDING responded, “Ready for another one.” Frank REDDING stated, “Damn already?” Tony REDDING responded, “Yeah I don’t play no games nigga who you talking to?” Frank REDDING stated, “God damn,” to which Tony REDDING responded, “Yes sir.” Frank REDDING

then asked Tony REDDING a question that was unintelligible to transcribers, to which Tony REDDING responded, "Yeah it ain't like that though buddy you know I gotta work with it." Frank REDDING stated, "Yeah I told you take the whole thing [amount of narcotics] that was here [in Frank REDDING's possession]." Tony REDDING responded, "Yeah I see. You ain't got no more [additional supply of narcotics]?"

109. Frank REDDING then said, "I still got the same 25 [grams] left you want to come and get it?" Tony REDDING responded, "It's too late. It's too hot [police activity] and too late." Frank REDDING stated, "Ok, I'll save it for you for the morning then." Tony REDDING responded, "Yeah." Frank REDDING repeated, "I'll save it for you for the morning." To which Tony REDDING responded, "But I can't give the people [CS-1] that they comin'." Frank REDDING stated, "Ok we'll have somethin' good [larger amount of narcotics] for them [customer]" Tony REDDING responded, "Yeah I can't get 'em there [25 grams] they ain't goin' for that meatball [amount of heroin less than the sum of 100 grams]. Frank REDDING stated, Let me know the day before they come." Tony REDDING responded, "Bullshit. I want you, you gotta show me what it is [the amount and quality]. I know what nigga bite [how much the customer wants, the degree of quality the customer is looking for], you know what I'm sayin'? The dude's [customer] scared but he's comfortable." Frank REDDING responded, "Yeah I be ready [with the narcotics supply] for him.

110. Based on my training and experience, the training and experience of other law enforcement officers involved in the investigation, my knowledge of the

investigation and the individuals under investigation, and the content and context of the communication, I believe that Frank REDDING and Tony REDDING agreed that Frank REDDING would supply CS-1 for the next transaction.

E. January 2, 2019 Transactions

111. As described below, on or about January 2, 2019, law enforcement conducted a controlled purchase by CS-1 from STEWART and Tony REDDING of approximately 101.3 grams of heroin supplied by Barry MICKIEL.

1. On or about January 2, 2019, STEWART and Tony REDDING sold CS-1 approximately 100 grams of heroin, supplied by MICKIEL.

112. On or about December 31, 2018 and January 1, 2019, STEWART and CS-1 exchanged text messages regarding a narcotics transaction. Specifically, on or about December 31, 2018, CS-1 texted STEWART, “Dude [customer] said he will be in town weds morning he trying to link grab the same shit & hit the highway by noon.” STEWART responded, Ok.” Based on my training and experience, and the context of the conversation, I believe CS-1 texted STEWART to arrange a narcotics transaction equivalent to a previous transaction—specifically 63 grams of crack cocaine in exchange for \$2,600 and approximately 100 grams of heroin in exchange for \$5,900 which occurred on or about December 13 and 14, 2018, as described earlier in this affidavit.

113. On or about January 1, 2019, at approximately 4:13 p.m. (TP3, Session 7420), STEWART, using Target Phone 1, called Tony REDDING, who was using

Target Phone 3. During the conversation, STEWART stated, “Man they [the customer] just text me, man. Make sure we gon be ready by 10 o clock.”

114. At approximately 4:15 p.m. (TP3, Session 7424), Tony REDDING, using Target Phone 3, called Barry MICKIEL, who was using Target Phone 5. On the call, Tony REDDING asked MICKIEL, “What’s good with you baby? You want some more Christmas change?” MICKIEL responded “Yeah.” Tony REDDING then said “They on they way baby. They be here tomorrow. You gunna have it ready for me to eat? [narcotics ready for the customer?]” MICKIEL responded, “Ummm, I’ll call you. Yup.” Tony REDDING then said “Yup. Be ready. Have the same [same amount as the previous transaction. . . . Same thing.” MICKIEL responded, “Alright.”

115. On or about January 2, 2019, at approximately 10:08 a.m. (TP1, Session 4548), REDDING, using Target Phone 3, called STEWART, who was using Target Phone 1. On the call, Tony REDDING called inquiring about the time CS-1 would be ready. Tony REDDING then said, “Aight. I just wanted you to call her. Cuz I done call the other people [MICKIEL], let em know to be ready.” STEWART responded, “Aight she gon call me before she hits the highway.” Tony REDDING then said, “Right. We do the same way as last time. Make sure everything right. You know what I’m sayin? We walk down, we go.”

116. At approximately 10:57 a.m., CS-1 texted STEWART, who was using Target Phone 1. On the text, CS-1 confirmed the price, asking, “Is it still the same for both 59 [\$5,900] and 24 [\$2,400]?? Don’t want no problems.” STEWART responded, “26 [\$2,600].” STEWART then said, “We can meet at 87 [Jewels].” CS-1 responded,

“That’s even better be there in about 35-40 minutes.” STEWART then said, “That’s one spot then we have to go to the other spot like last time. Just let me know when you’re 10 minutes away.”

117. At approximately 11:37 a.m., CS-1 met with law enforcement at a predetermined location. Law enforcement searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of money with negative results. Law enforcement provided CS-1 with approximately \$8,500 in FBI funds and equipped CS-1 with a covert audio/video recording device.

118. At approximately 11:49 a.m. (TP1, Session 4563), STEWART, using Target Phone 1, received a call from Tony REDDING, using Target Phone 3. On the call, REDDING stated, “We gotta make sure the paperwork [money] right unless you gon make sure it’s right.” STEWART responded, “Nah we can do it together. I’m a call you when we leave here.”

119. At approximately 11:49 a.m., while under constant law enforcement surveillance, CS-1 departed the predetermined location and proceeded to the area of 87th Street and the Dan Ryan Expressway. At approximately 11:52 a.m., law enforcement observed STEWART exit his vehicle and enter the front passenger side of the vehicle driven by CS-1.

120. According to CS-1, CS-1 handed STEWART a bag containing the \$8,500 in prerecorded FBI funds. According to CS-1, STEWART then took \$2,600 for the crack cocaine and exited the vehicle driven by CS-1. STEWART then conducted a transaction with Individual A for the crack cocaine.

121. At approximately 12:04 p.m. (TP3, Session 7685), Tony REDDING, using Target Phone 3, placed an outgoing call to Barry MICKIEL, who was using Target Phone 5. On the call, MICKIEL answered, "Hey Tiger." Tony REDDING responded, "They [CS-1 and STEWART] just got off [the interstate]. MICKIEL asked "They just got off the expressway?" and Tony REDDING confirmed, "yeah they just got off the expressway." MICKIEL stated, "Ok give me a minute, um, I'm comin' from my crib so..." Tony REDDING advised, "Aight come on." MICKIEL responded, "I had spent the night at the hotel so I'm actually passing up Rosemont."

122. At approximately 12:17 p.m., law enforcement observed CS-1's vehicle and STEWART's vehicle arrive in the area of 62nd and Loomis. At approximately 12:31 p.m., law enforcement surveillance observed STEWART enter the vehicle driven by CS-1. Subsequently, law enforcement observed Tony REDDING, driving REDDING Vehicle 1, arrive at approximately 1419 West 62nd Street and park in close proximity to the vehicle driven by CS-1. Law enforcement surveillance then observed Tony REDDING enter the back passenger side of the vehicle driven by CS-1. According to CS-1 and as seen on the covert audio/video recording device, STEWART handed Tony REDDING \$5,900 and Tony REDDING proceeded to count the money, confirming it totaled \$5,900.

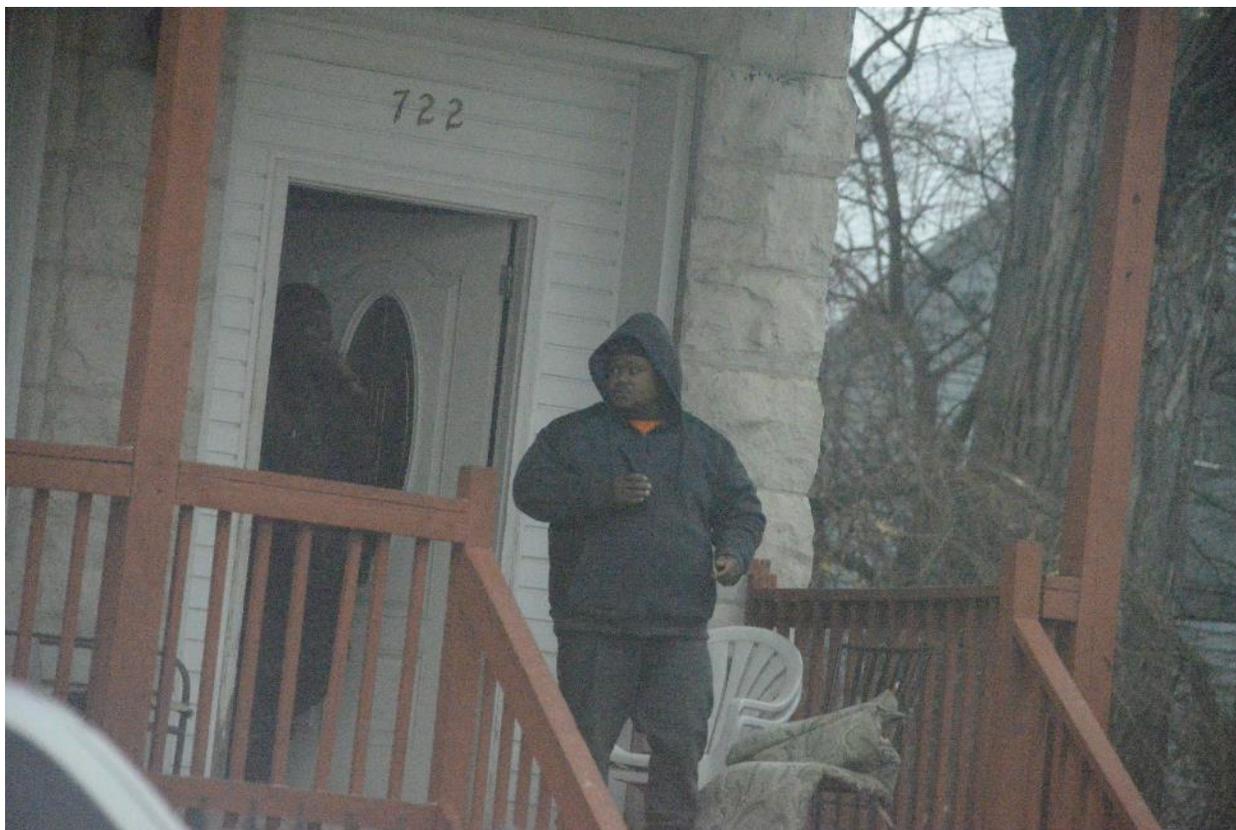
123. At approximately 12:26 p.m. (TP3, Session 7697), Tony REDDING, using Target Phone 3, placed an outgoing call to Barry MICKIEL, who was using Target Phone 5. On the call, MICKIEL answered, "Yeah" Tony REDDING asked "Where you at now big dog?" MICKIEL responded "I told you I was coming from

Rosemont.” Tony REDDING asked “How long that’s gonna be?” MICKIEL stated, “I’m on my way now man. I’m on my way right now.” Tony REDDING replied, “Ok. Cuz they [CS-1 and STEWART] here ready.” MICKIEL replied, “Ok.”

124. At approximately 12:34 p.m., law enforcement surveillance observed Tony REDDING, STEWART, and CS-1, each in separate vehicles depart from the area of 1419 W. 62nd Street. Law enforcement observed CS-1 and STEWART each drive to and park at approximately 61st Street and Aberdeen Street. Separately, Tony REDDING traveled to MICKIEL’s residence at 722 W. 60th Street.

125. At approximately 1:04 p.m. (TP3, Session 7718), Tony REDDING, using Target Phone 3, received an incoming call from Barry MICKIEL, who was using Target Phone 5. On the call, Tony REDDING answered, “Yeah.” MICKIEL asked, “Where ya at?” Tony REDDING replied, “Outside.” MICKIEL responded, “Aight. Come on.”

126. At approximately 1:09 p.m., law enforcement observed Tony REDDING exit REDDING Vehicle 1 and approach the residence at 722 West 60th Street. Law enforcement surveillance observed MICKIEL at the door of the residence, appearing to have brief conversation with Tony REDDING. Subsequently, MICKIEL entered the residence at 722 West 60th Street and Tony REDDING momentarily returned back to REDDING Vehicle 1. A photograph of MICKIEL and Tony REDDING standing at the door of the residence is below:



127. At approximately 1:14 p.m. (TP 1, Session 4581), Tony REDDING, while using Target Phone 3, placed an outgoing call to Fredrick STEWART, who was using Target Phone 1. During the call, Tony REDDING stated, “60th and Union. Right there where we met last time, you know where we met at last time [previous narcotics transaction involving STEWART, Tony REDDING and MICKIEL occurring on December 14, 2018].” STEWART asked, “You ready now?” Tony REDDING responded, “Right now.” STEWART replied, “Aight here we come.” Tony REDDING stated, “Aight I’m already over here.”

128. At approximately 1:16 p.m., law enforcement observed CS-1’s vehicle leave 61st Street and Aberdeen Street following STEWART’s vehicle. At approximately 1:21 p.m., as law enforcement observed CS-1 arrive and park at

approximately 722 West 60th Street, law enforcement also observed Tony REDDING return to the entrance of 722 W. 60th, meet with MICKIEL, and then subsequently walk down the front steps. Law enforcement then observed STEWART and Tony REDDING walk toward the vehicle driven by CS-1 and enter CS-1's vehicle. According to CS-1, and as heard on audio recording equipment, Tony REDDING then gave CS-1 a bag containing approximately 100 grams of suspected heroin.

129. At approximately 1:25 p.m., CS-1, while under constant law enforcement surveillance, departed the location and drove to a predetermined location, where agents again searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of U.S. currency, with negative results. Law enforcement debriefed CS-1 and deactivated the electronic audio and video recording equipment. CS-1 gave law enforcement a plastic bag provided to CS-1 by Tony REDDING, containing what was later determined by DEA lab testing to be approximately 101.3 grams of heroin, with a detectable trace of fentanyl.

F. January 24, 2019 Transaction

130. As described below, on or about January 24, 2019, law enforcement conducted a controlled purchase by CS-1 of approximately 125 grams of cocaine base from Fredrick STEWART and Ramont AUSTIN.

131. As described above, during the course of the investigation, and partly based on the above information, agents obtained court-authorization to intercept conversations over a number of phones used by STEWART, AUSTIN, Tony REDDING, Frank REDDING, and Barry MICKIEL. Specifically:

a. On or about January 8, 2019, Chief Judge Ruben Castillo signed an order authorizing the renewed interception of wire and electronic communications over telephone number 312-852-4209 (Target Phone 5), used by Barry MICKIEL. Interceptions of Target Phone 5 began on January 8, 2019 and continued through February 6, 2019; and

b. On or about January 16, 2019, Chief Judge Ruben Castillo signed an order authorizing the renewed interception of wire and electronic communications over telephone number (773) 329-8112 (Target Phone 1), used by STEWART; the renewed interception of wire communications over telephone number 773-559-6921 (Target Phone 2), used by Ramont AUSTIN; and the initial interception of wire and electronic communications over telephone number (312) 438-6907 (Target Phone 6), used by Frank REDDING. Interceptions over Target Phone 1, Target Phone 2, and Target Phone 6 began on January 16, 2019 and continued through February 14, 2019.

1. **On or about January 24, 2019, STEWART sold CS-1 approximately 125 grams of cocaine base, supplied by AUSTIN.**

132. On or about January 19, 2019, STEWART inquired on behalf of his narcotics suppliers as to a timeline of when CS-1 would be ready to purchase narcotics again. Specifically, at approximately 8:31 a.m., STEWART, using Target Phone 1 texted CS-1, “Gm [Good morning] every thing good.”³⁰ CS-1 responded, “Good afternoon & yea.” STEWART replied, “My boy told me to ask you where are y’all good.”

³⁰ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather than a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

CS-1 texted back, "He [the customer] hit me said he trying to get more money up but he making a trip soon." Stewart replied, "Ok."

133. Later that same day, at approximately 10:59 a.m., CS-1 texted STEWART, "Just talked to buddy he trying to double up on the lower priced one and up the other to 150 he need a price he will be here Thursday morning." STEWART texted, "Need to Talk to you when you can" and "5000\$/8500." CS-1 texted, "Ok cool" and "I'll let u know what he say just sent him the price." Based on my knowledge of the investigation and the context and content of the text messages, I believe CS-1 texted STEWART that CS-1's customer wanted to double the purchase to approximately 126 grams of crack cocaine and 150 grams of heroin and would need a price. STEWART stated that the crack cocaine would cost \$5,000 and the heroin would cost \$8,500.

134. On or about January 23, 2019, STEWART, using Target Phone 1, texted CS-1.³¹ During the conversation, STEWART stated, "Good morning let me know if you're still on for tomorrow." CS-1 replied, "Good morning I'm bout to text him right now" and later, "He said it's a go tomorrow at 11." STEWART then said, "No problem with the price." CS-1 texted back, "Naw he said ok" and "Just the usual spill make it quick cause he wanna be in & out." STEWART replied, "All the regular not the double." CS-1 texted, "Yea the double that's the price for the double & extra 50." STEWART texted, "5@8500." CS-1 texted, "Yea."

³¹ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather than a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

135. On or about January 24, 2019, at approximately 8:46 a.m., STEWART, using Target Phone 1, and CS-1 texted about the time and meeting location of the transaction that day. They agreed to meet around 10:30 a.m., and to meet around 88th Street and Carpenter Street, where they had previously met.

136. On January 24, 2019, at approximately 9:58 a.m. (TP2, Session 2470), STEWART, using Target Phone 1, called AUSTIN, using Target Phone 2, and told AUSTIN that CS-1 was on the way.

137. At approximately 11:05 a.m. (TP1, Session 5666), AUSTIN, using Target Phone 2, called STEWART, who was using Target Phone 1, regarding the transaction. The following exchange took place:

STEWART: Hello

AUSTIN: She ain't get there yet huh?

STEWART: She text me saying some shit, but um, she said she wasn't coming or nothing but I guess she stopped and got the money. Or whatever. Both of ya'll bullshitting cuz she waiting and then I guess she don't wanna be waiting like she always be. Like ya'll, ya'll always be having her waiting and shit. So that's why she probably waiting til you come or whatever. I dunno but. This shit getting on my fuckin nerves. Every rip too

AUSTIN: Umm.

STEWART: Hurry up man. I dunno what the fuck

AUSTIN: See, I don't mind coming but shit, I don't wanna be sitting somewhere, know what I'm saying...

STEWART: Oh nigga, I wouldn't let you do that. I'd put it in the house. Put it in my car before you have to sit over there. Know what I'm saying. I'll sit in the car while we sit outside. I mean sit in the house while we sit outside. If that's the case. I already thought about that anyway.

AUSTIN: Right

STEWART: But um, hold, um, shit, I was just finna text her but then she probably wonderin, why I ain't text, why you not here yet? Know what I'm saying. Cuz she was talking about he was, uh, uh, talking about he don't want me to be sitting and waiting with all this money on hand. Like last time. Like the last two times. Know what I'm saying, so. Specially Tiger. That shit was really ridiculous, with him.

AUSTIN: Oh hell yeah. Yeah.

STEWART: I mean I'm talking about the last two times with him. After waiting another hour, waiting and shit. She sitting here waiting.

138. At approximately 11:08 a.m. (TP2, Session 2475), STEWART, using Target Phone 1, called AUSTIN, using Target Phone 2, to tell AUSTIN to come for the narcotics transaction.

139. At approximately 11:15 a.m., CS-1 met with law enforcement at a predetermined location. Law enforcement searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of money, with negative results. Law enforcement provided CS-1 with approximately \$13,500, consisting of \$5,000 and \$8,500 in separate bundles, and equipped CS-1's vehicle with a covert audio/video recording device. At approximately 11:33 a.m., CS-1 departed the predetermined location and proceeded to the area around 88th Street and Carpenter Street.

140. At approximately 11:41 a.m., law enforcement surveillance observed a vehicle driven by CS-1 arrive in the area of 88th Street and Carpenter Street. Law enforcement then observed STEWART enter the front passenger side of the vehicle driven by CS-1. According to CS-1, CS-1 handed STEWART a bag containing the

money. STEWART separated the money--\$5,000 intended for the crack cocaine and \$8,500 intended for the heroin.³²

141. At approximately 11:51 a.m. (TP1, Session 5670), STEWART, using Target Phone 1, called AUSTIN, using Target Phone 2. On the call, AUSTIN stated that he was about halfway to the meet location.

142. At approximately 12:14 p.m., law enforcement surveillance observed AUSTIN Vehicle 1 arrive in the area of 88th Street and Carpenter Street and park across the street from CS-1's vehicle. Law enforcement then observed STEWART exit the vehicle driven by CS-1 and enter the passenger side of AUSTIN Vehicle 1. A few minutes later, law enforcement surveillance observed STEWART exit AUSTIN Vehicle 1 and re-enter the vehicle driven by CS-1. According to CS-1, after STEWART entered CS-1's vehicle, he handed CS-1 a bag containing suspect crack cocaine. Shortly thereafter, STEWART exited the vehicle driven by CS-1 and entered his own vehicle.

143. At approximately 2:19 p.m.,³³ CS-1, while under constant law enforcement surveillance, departed the location and drove to a predetermined location. Agents again searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of U.S. currency, with negative results. CS-1 was also debriefed and the electronic audio and video recording equipment was deactivated. CS-1 gave

³² Although CS-1's vehicle was equipped with an audio/video recording device, the video malfunctioned. The audio still functioned. The sound of paper and a plastic bag rattling can be heard on the recording, consistent with the counting of money.

³³ Between approximately 12:30 p.m. and 2:19 p.m., STEWART and CS-1 attempted to arrange a transaction with Tony REDDING for the sale of approximately 150 grams of heroin. That transaction did not occur on January 24, 2019 as planned. Law enforcement surveilled the attempt and CS-1 was under constant surveillance during that time.

law enforcement a plastic bag containing a substance that was later determined by DEA lab testing to be approximately 125.3 grams of cocaine base.

G. February 8, 2019 Transaction

144. As described below, on or about February 8, 2019, law enforcement conducted a controlled purchase by CS-1 of approximately 149.1 grams of heroin containing a detectable trace of fentanyl from Fredrick STEWART and Tony REDDING, who was supplied by Frank REDDING.

1. On or about February 8, 2019, STEWART and Tony REDDING sold CS-1 approximately 149 grams of heroin, supplied by Frank REDDING.

145. On or about February 6, 2019, at approximately 1:57 p.m., STEWART, using Target Phone 1, texted CS-1 inquiring about a potential narcotics transaction.³⁴ Specifically, CS-1 and STEWART exchanged the following text messages:

STEWART: Hi how was looking they are axing me to ask you

CS-1: I was just bout to text u he [the customer] said can they [STEWART and his suppliers] be ready Friday [February 8, 2019] morning with the 150 [150 grams of narcotics]

STEWART: They said OK

CS-1: Ok cool I'll let him know right now I'll be free bout 9:30 10 Friday morning

STEWART: Yup

³⁴ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather than a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

146. On or about February 7, 2019 at approximately, 6:42 p.m., STEWART, using Target Phone 1, texted CS-1 to confirm they would proceed with the narcotics transaction the following day.

147. On or about February 7, 2019, at approximately 6:43 p.m. (TP1, Session 6771), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, STEWART asked Tony REDDING, “Yeah I was just making sure tomorrow we ready man about 11, 12.” Tony REDDING replied, “I’m ready.”

148. The next day, on or about February 8, 2019, at approximately 10:21 a.m. (TP 6, Session 3857), Frank REDDING, using Target Phone 6, texted Tony REDDING, who was using Target Phone 3, and asked, “What time you going b ready for me to bring you that [ordered narcotics] to building?”

149. At approximately 11:26 a.m., CS-1 texted STEWART, who was using Target Phone 1.³⁵ Specifically, CS-1 asked, “Is dude [REDDING] going to be ready at 12?” STEWART responded, “He just called me and asked what time I told him you say at 11 or 12.”

150. At approximately 11:30 a.m. (TP 6, Session 3864), Tony REDDING, using Target Phone 3, sent a text message to Frank REDDING, who was using Target Phone 6, and stated, “The, hold [whole], 150 [grams].” Subsequently, at approximately 11:34 a.m. (TP 6, Session 3865), Tony REDDING, who was using

³⁵ This communication was not captured over Target Phone 1, possibly because it was sent as an iMessage, rather than a normal text message; however, agents captured screenshots of these communications between CS-1 and STEWART, who was using Target Phone 1.

Target Phone 3, placed an outgoing call to Frank REDDING, who was using Target Phone 6. Tony REDDING asked, “You coming to the building or you want me to come your way?” Frank REDDING responded that he was “coming to the building.” Tony REDDING replied, “Come on.” To which Frank REDDING responded, “OK, I’ll be there in twenty.” Tony REDDING asked, “You bring the whole thing? [the entire order of narcotics—150 grams].” Frank REDDING confirmed, “Yeah yeah, I’ll be there in about twenty minutes.”

151. At approximately 12:59 p.m. (TP1, Session 6817), STEWART, using Target Phone 1, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, STEWART told Tony REDDING that STEWART was waiting for CS-1 at around 69th Street and Loomis Street. STEWART then asked Tony REDDING where they should meet, “I said I’m on 69th and Loomis, I’m saying we gonna come your way, where we last time in this lot or we come to the house somewhere?” Tony REDDING replied, “Yea, you’ll come right there where the house, the house.”

152. At approximately 1:02 p.m. (TP 6, Session 3878), Tony REDDING, using Target Phone 3, placed an outgoing call to Frank REDDING, who was using Target Phone 6. During the call, Frank REDDING stated, “Coming down Halsted Tiger. Finna pull up.” Tony REDDING responded, “They [CS-1 and STEWART] impatient bro, they steady callin.” Frank REDDING then reassured Tony REDDING, “I’m coming down Halsted. I’ll be there in three minutes.” Tony REDDING replied, “Alright. Alright.”

153. At approximately 1:03 p.m. (TP6, Session 3879), Tony REDDING, using Target Phone 3, sent an outgoing text message to Frank REDDING, who was using Target Phone 6. In the message, Tony REDDING stated, “I can’t have them [CS-1 and STEWART] waiting you knew all this yesterday that’s not right.” Subsequently, at approximately 1:07 p.m. (TP6, Session 3881), Tony REDDING, using Target Phone 3 sent an outgoing text message to Frank REDDING, who was using Target Phone 6, instructing him to “Come to alley.”

154. Law enforcement surveillance confirmed that, following this text message, at approximately 1:10 p.m., Frank REDDING, driving a silver Chevrolet Traverse with registration FL KCEZ16 turned into the alley behind Tony REDDING’s residence at 1349 W. 69th Street:



155. At approximately 1:12 p.m., law enforcement surveillance observed STEWART arrive at 69th Street and Loomis Street. Shortly thereafter, law enforcement surveillance observed Tony REDDING driving REDDING Vehicle 1 park on 69th Street and Loomis Street in front of STEWART's vehicle and then enter the front passenger side of STEWART's vehicle.

156. At approximately 1:20 p.m., CS-1 met with law enforcement at a predetermined location. Law enforcement searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of money with negative results. Law enforcement provided CS-1 with approximately \$8,500 in FBI funds and equipped CS-1's vehicle with a covert audio/video recording device.

157. At approximately 1:22 p.m. (TP1, Session 6826), STEWART, using Target Phone 1, called CS-1. CS-1 told STEWART that CS-1 would be there in approximately 10 minutes. STEWART told CS-1 to meet STEWART at 69th and Loomis Street. Shortly thereafter, CS-1 departed the predetermined law enforcement meet location and proceeded to 69th Street and Loomis Street.

158. At approximately 1:38 p.m., law enforcement surveillance observed STEWART and Tony REDDING exit STEWART's vehicle and enter 1349 W. 69th Street, believed to be Tony REDDING's residence.³⁶

³⁶ Law enforcement believes 1349 W. 69th Street is Tony REDDING's residence based on a review of public records. Law enforcement also conducted surveillance of Tony REDDING, which showed that Tony REDDING frequented the location during the early morning and late night hours, consistent with a residence.

159. At approximately 1:43 p.m., law enforcement surveillance observed a vehicle driven by CS-1 arrive in the area of 69th Street and Loomis Street.

160. At approximately 1:50 p.m., law enforcement surveillance observed STEWART and Tony REDDING exit 1349 W. 69th Street. Law enforcement then observed both Tony REDDING and STEWART enter REDDING Vehicle 1 and travel northbound on Loomis Street.

161. At approximately 1:51 p.m. (TP1, Session 6828), STEWART, using Target Phone 1, received an incoming call from CS-1. During the call, STEWART told CS-1 that he was in a van [REDDING Vehicle 1]. STEWART then told CS-1 to follow the van when the van pulled up by CS-1's car.

162. At approximately 1:53 p.m., law enforcement surveillance observed REDDING Vehicle 1 and CS-1's vehicle turn onto 69th Street and Loomis Street. Law enforcement surveillance then observed the vehicles briefly drive around the neighborhood and return and park on 69th Street in front of the 1349 W. 69th Street residence. Based on my training and experience, and the training experience of other officers involved in the investigation, I believe that Tony REDDING drove around the neighborhood in an effort to detect law enforcement presence before conducting the transaction.

163. At approximately 1:54 p.m., law enforcement surveillance observed Tony REDDING, STEWART, and CS-1 exit their vehicles and enter Tony REDDING's

residence at 1349 West 69th Street. According to CS-1,³⁷ once inside, CS-1 observed what appeared to be a living room with a scale on a table. CS-1 took the money and laid it on the floor. Tony REDDING, STEWART, and CS-1 proceeded to count the money. After confirming that \$8,500 was present, CS-1 observed Tony REDDING walk down a hallway and turn left into a room. CS-1 heard the sound of a door opening and Tony REDDING walking upstairs. Shortly thereafter, Tony REDDING returned with the suspect heroin and weighed it on the scale. According to CS-1, the scale showed the number “151.” According to CS-1, Tony REDDING then handed CS-1 a bag containing suspected heroin.

164. At approximately 2:07 p.m., law enforcement surveillance observed Tony REDDING, STEWART, and CS-1 exit 1349 West 69th Street. CS-1, while under constant law enforcement surveillance, departed the location and drove to a predetermined location.

165. At approximately 2:19 p.m., CS-1 arrived at the predetermined location. Law enforcement searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of U.S. currency, with negative results. CS-1 was debriefed and the electronic audio and video recording equipment was deactivated. CS-1 then gave law enforcement a bag containing a substance that was later confirmed by DEA lab testing to be approximately 149.1 grams of heroin containing a detectable trace of fentanyl.

³⁷ CS-1 had an audio/video recording device on CS-1's person. However, the device malfunctioned and did not record the transaction.

H. March 8, 2019 Transaction

166. As described below, on or about March 8, 2019, law enforcement conducted a controlled purchase by CS-1 of approximately 250 grams of heroin from Fredrick STEWART and Tony REDDING, supplied by Frank REDDING.

167. As described above, during the course of the investigation, and partly based on the above information, agents obtained court-authorization to intercept conversations over a number of phones used by STEWART, AUSTIN, Tony REDDING, Frank REDDING, and Barry MICKIEL. Specifically:

a. On or about February 25, 2019, Chief Judge Ruben Castillo signed an order authorizing the renewed interception of wire and electronic communications over telephone number (312) 438-6907 (Target Phone 6), used by Frank REDDING. Interceptions over Target Phone 6 began on February 25, 2019 and continued through March 26, 2019.

168. On or about February 26, 2019 at approximately 2:31 p.m., (TP 6, Session 4935), Frank REDDING, using Target Phone 6, placed an outgoing call to Tony REDDING, who was using Target Phone 3. During the call, Frank REDDING asked, "What she [CS-1] say bum?" Tony REDDING responded, "I ain't call her yet, I'mma call her." Frank REDDING confirmed, "Okay, she's waiting on you that's all." Tony REDDING responded, "I got ya, I'mma call her." Later in the call, Tony REDDING emphasized, "gotta be ready [with the narcotics supply] man you gonna be ready?" Frank REDDING asked, "What you say when Thursday [transaction date]." Tony REDDING confirmed, "Quick I'mma call you right back."

1. On or about March 8, 2019, STEWART and Tony REDDING sold CS-1 250 grams of heroin, supplied by Frank REDDING.

169. On or about February 26, 2019, at approximately 4:00 p.m., (TP 6, Session 4955), Tony REDDING, using Target Phone 3, sent an outgoing text to Frank REDDING, who was using Target Phone 6. In the message, Tony REDDING stated, “Greyhound [heroin] 250 [grams] Thursday morning [transaction date] be ready.”

170. Later on or about February 26, 2019, STEWART, using Target Phone 1, and CS-1 exchanged the following messages regarding a potential narcotics transaction:³⁸

CS-1: Good morning! He [the customer] said he will be in town Wednesday or Thursday but u want a 25

STEWART: GM what’s that

CS-1: Ok boy that be on time

CS-1: OI

STEWART: What

CS-1: He coming in town weds or thurs he need the price for a 2 and a split but not pussycat [two and a half ounces of crack but no heroin]

CS-1: Other dude

STEWART: Call me when u can

STEWART: 5000 [\$5000]

CS-1: Ok I’m bout to tell him now

³⁸ CS-1 took screenshots of the following messages between CS-1 and STEWART contained in this section of the affidavit and sent them to law enforcement.

CS-1: Ok I just talked to him he was the same thing the 2 63's [two orders of 63 grams of crack] the other he want 250gs [250 grams of heroin]

STEWART: What day

CS-1: Thursday

CS-1: Price?

STEWART: I am waiting on it

CS-1: Ok

STEWART: 16.050 [\$16,050]

CS-1: Ok

171. Based upon the contents of the conversation, the context of both prior and subsequent conversations, my knowledge derived from this investigation, and my experience and familiarity with narcotics trafficking, I believe CS-1 told STEWART that CS-1's buyer would be in town on Thursday, and wanted to purchase two orders of 63 grams of crack cocaine and 250 grams of heroin. STEWART responded that the price would be \$16,050.

172. On or about February 27, 2019, CS-1 sent STEWART, who was using Target Phone 1, a text message stating, "He said he might not be able to pull all the money together until after them checks hit over the weekend so he will definitely be up her early next week." STEWART replied, "Ok."

173. On or about February 28, 2019, at approximately 11:45 a.m., (TP 6, Session 5063), Frank REDDING, using Target Phone 6, called Tony REDDING, who was using Target Phone 3. During the call, Tony REDDING stated, "They got to get some more money big bro. . . . Yeah they got to get some more money and shit. We

just waiting. We just waiting. They want, they want the two-fifty [250 grams]. I told em, I gave em a good price, they couldn't beat it. You know, they talk about they gotta get some more money, I said go ahead then. I can't cut myself short, right?" Frank REDDING responded, "No." Tony REDDING then said, "They get some more money . . . They say, they say by next week they be ready." Later in the call, Frank REDDING stated, "Ok. I just wondering cuz you ain't hit me [hadn't reached out to me for the heroin]."

174. Based upon the contents of the conversation, the context of both prior and subsequent conversations, and my knowledge derived from this investigation, I believe Tony REDDING called Frank REDDING, his supplier, to tell him that CS-1 and STEWART would not be ready to purchase the heroin until the following week.

175. On or about March 5, 2019, STEWART, using Target Phone 1, sent CS-1 a text message stating, "Hey what is it looking like Thursday." CS-1 responded, "Let me see now."

176. That same day, at approximately 7:13 p.m. (TP 6, Session 5850), Frank REDDING, using Target Phone 6, called Tony REDDING, who was using Target Phone 3. During the call, Tony REDDING asked, "What's good with you?" to which Frank REDDING responded, "Nothing waiting on you see what happen with greyhound [250 grams of heroin] baby." Tony REDDING responded, "Huh. They ain't got it yet. I got it yet. I told you I got you that's how I make my lil cut" and "Yeah aint nobody else got it cheaper. (UI) I'm cool with it." Frank REDDING then said, "Yeah

yeah yeah yeah I was just wondering” and later in the call, “I’ll be waiting on you I will be ready.”

177. On or about March 6, 2019, at approximately 1:07 p.m., STEWART, using Target Phone 1, sent CS-1 a text message saying, “Yo.” CS-1 responded, “I’m bout to call him [the customer] again he was suppose to call [me] back.”

178. That same day, at approximately 6:40 p.m., CS-1 and STEWART, who was using Target Phone 1, had the following message exchange:

CS-1: He [the customer] just hit me back & said Friday at 4

STEWART: Ok what’s the order [what narcotics will be purchased?]

CS-1: 2 63 of c 250d [126 grams of crack and 250 grams of heroin]

STEWART: That’s a bad time for you isn’t it

CS-1: I can talk

STEWART: I’m talking about Friday

CS-1: Friday morning bad that’s why it gotta be the afternoon

STEWART: OK

CS-1: Send the price [for the narcotics] again so I can make sure I got it so I can be in & out

STEWART: 5000\$@. 1650 [crack cocaine will cost \$5,000 and heroin will cost \$16,050]

CS-1: Ok

CS-1: Wait 16,050 for everything? [Is the total \$16,050?]

STEWART: 250d [250 grams of heroin]

CS-1: Ok cause I thought I said that for everything give me a second

CS-1: He said he want the D Friday and weds when his girl her her taxes he a grab the c [The heroin will be purchased Friday, and the cocaine will be purchased the following Wednesday after the customer obtains additional money.]

179. On or about March 8, 2019, STEWART, using Target Phone 1, and CS-1, had a text message conversation confirming that they were ready to conduct the narcotics transaction, and planned to meet around 4:00 p.m. at 69th Street and Loomis Street.

180. That same day, at approximately 3:19 p.m. (TP 6, Session 6199), Frank REDDING, using Target Phone 6, called Tony REDDING, who was using Target Phone 3. On the call, Frank REDDING stated, "Where you at money?" Tony REDDING responded, "Right here, they say they'll be down here around 4. You wanna wait til um, you wanna wait til um, they get here or you want me to gone head and make the move?" Frank REDDING responded, "Its your call lil bro. I need to know so I can meet you at the house or something you know what I'm saying." Tony REDDING then said, "Aight well its good then that's good timing so we just gone wait and see yo know what I'm saying know for a fact they coming fo sho. Why would they say they would but you know what I'm sayin. I'd rather know for a fact you feeling me bro. . . . Instead of making a move like that you know what I mean." Frank REDDING responded, "Yeah I'm with ya." Tony REDDING then said, "Right so we'll just wait and see what's going on and wait it out come meet you half way, trail you or how we gone do it." Frank REDDING responded, "Yeah, come to the house."

181. At approximately 4:13 p.m. (TP 6, Session 6228), Frank REDDING, using Target Phone 6, called Tony REDDING, who was using Target Phone 3. On the

call, Frank REDDING stated he would be there in five minutes. Tony REDDING then said, "You better act like you want this money" Frank REDDING responded, "Yeah, hell yeah I want the money bad as you do. . . . I been told you come on." Tony REDDING then said, "Ah bull shit I can't have them people waiting (UI) big bro." Frank REDDING then said, "I'll be there in 5 minutes man."

182. At approximately 4:18 p.m., CS-1 met with law enforcement at a predetermined location. Law enforcement searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of money with negative results. Law enforcement provided CS-1 approximately \$16,050 in FBI funds and equipped CS-1 and CS-1's vehicle with a covert audio/video recording device. At approximately 4:43 p.m., CS-1 departed the predetermined location and proceeded to 69th Street and Loomis Street.

183. At approximately 4:38 p.m. (TP 6, Session 6232), Frank REDDING, using Target Phone 6, called Tony REDDING, who was using Target Phone 3. On the call, Frank REDDING asked, "We gotta go to the same place? . . . Same place you went last time?" Tony REDDING responded, "The building [UI] this ain't on the street, dis at the building." Frank REDDING then asked, "Ok you going in the building?" Tony REDDING responded, "Yeah I ain't got time to be on the street to be doing that bullshit."

184. At approximately 4:58 p.m., law enforcement surveillance observed a vehicle driven by CS-1 arrive in the area of 69th Street and Loomis Street and park directly behind STEWART's vehicle. Law enforcement then observed CS-1 enter Tony

REDDING's residence at 1349 W. 69th Street. According to CS-1, once inside, CS-1 observed the same living room setup as the February 8, 2019 transaction. According to CS-1 and audio/video recording, CS-1 took the money and laid it on the floor. Tony REDDING, STEWART, and CS-1 proceeded to count the money.

185. According to the audio/video recording device equipped on CS-1's person, the following conversation occurred inside of the residence:

Tony REDDING: How much you had brought?

STEWART: Should be 1650 [\$16,050.00]

CS-1: 1650 [\$16,050.00]

Tony REDDING: Aight look, just wanted to show it [heroin] to you right quick

[Plastic bag rustling, as heard on A/V device.]

Tony REDDING: 25 point two five. Two hundred and fifty [grams].

CS-1: Ok

STEWART: You got it [funds] in g stacks [\$1,000.00 rolls] or what?

CS-1: Yeah

Tony REDDING: Bout time. You know we got to count this shit. Worst part isn't it?

STEWART: Well that's one bundle [one thousand dollars].

CS-1: This six thousand [dollars].

STEWART: Aight well take that right off the top so ain't no bullshit.

Tony REDDING: You hold that one.

[Tony REDDING, wearing a grey hooded sweater with a front zipper and dark colored hat counting funds, as seen on A/V device.]:



Tony REDDING: You doin' good. My people say you doin' good. (UI) this year.

[Tony REDDING speaks into his phone using voice text, as seen on the A/V device.]

Tony REDDING: Here I come, we almost finished.

CS-1: And there's the odd fifty [\$50.00].

STEWART: Ok

[Tony REDDING then asks CS-1 to recount a bundle of funds, which CS-1 counts to be a thousand dollars.]

STEWART: This four [\$4,000.00] right here.

Tony REDDING: That's four. So this make what? Nine, ten, [pause] twelve, thirteen, fourteen, fifteen, fifty [proceeds to count the funds in his hands], aight that'll do.

186. According to CS-1, after confirming that \$16,050 was present, CS-1 observed Tony REDDING walk down a hallway and turn into a room. CS-1 heard the sound of a door opening and Tony REDDING walking upstairs. Shortly thereafter, Tony REDDING returned with the suspect heroin and weighed it on the scale. According to CS-1, Tony REDDING then handed CS-1 a bag containing suspected heroin.

187. At approximately 5:06 p.m., law enforcement surveillance observed CS-1 exit the residence and, while under constant law enforcement surveillance, departed the location and drove to a predetermined location. Law enforcement again searched CS-1 and the vehicle driven by CS-1 for contraband and excessive sums of U.S. currency, with negative results. Law enforcement debriefed CS-1 and deactivated the electronic audio and video recording equipment. CS-1 gave law enforcement a bag containing a substance that was later determined by DEA lab testing to be approximately 250 grams of heroin containing a detectable trace of fentanyl.

188. The next day, at approximately 2:21 p.m. (TP 6, Sessions 6382, 6383), Frank REDDING, using Target Phone 6, texted Tony REDDING, who was using Target Phone 3. In the message, Frank REDDING asked, "Lil bro how was that car [heroin] I gave you was it ok" to which Tony REDDING respond, "Yeah 50/50."

189. Based upon the contents of the conversation, the context of both prior and subsequent conversations, and my knowledge derived from this investigation, I believe Frank REDDING asked Tony REDDING if CS-1 was happy with the supply of heroin.

Conclusion

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

a. On or about January 2, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Barry MICKIEL distributed a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

b. On or about January 24, 2019 at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Ramont AUSTIN distributed a controlled substance, namely, 28 grams or more of a mixture and substance containing cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

c. On or about February 8, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Frank REDDING distributed a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); and

d. On or about March 8, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Frederick STEWART and Tony

REDDING distributed a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

FURTHER AFFIANT SAYETH NOT.

SHAMAR BAILEY
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to
telephonically on July 27, 2020.

Honorable BETH W. JANTZ
United States Magistrate Judge