

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEB -2 2022

MAGISTRATE JUDGE MARIA VALDEZ
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

v.

CASE NUMBER:

22 CR 59

TROY CLARK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about February 1, 2022, at Calumet City, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section


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

Offense Description

possession with intent to distribute a controlled substance, namely, 400 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

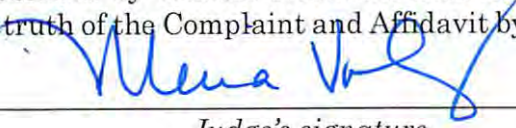
This criminal complaint is based upon these facts:

X Continued on the attached sheet.


BLAKE SMITH
Special Agent, Drug Enforcement Administration (DEA)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: February 2, 2022



Judge's signature

City and state: Chicago, Illinois

MARIA VALDEZ, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, BLAKE SMITH, being duly sworn, state as follows:

1. I am a Special Agent with the Drug Enforcement Administration (“DEA”). I have been so employed since approximately January 2004.

2. As part of my duties as a DEA Special Agent, I investigate criminal violations relating to narcotics trafficking offenses, including criminal violations of the Federal Controlled Substance laws, including, but not limited to Title 18, United States Code, Sections 1956, and 1957, and Title 21, United States Code, Sections 841, 843, 846, 848, 952 and 963. I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage, and importation of controlled substances.

3. I have received training in the area of narcotics investigations, money laundering, financial investigations, and various methods which drug dealers use in an effort to conceal and launder the proceeds of their illicit drug trafficking enterprises. I have participated in numerous investigations involving violations of narcotics laws.

4. This affidavit is submitted in support of a criminal complaint alleging that TROY CLARK possessed with intent to distribute a controlled substance, namely, 400 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). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CLARK with violating 21 U.S.C. § 841(a)(1), 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 defendant committed the offense alleged in the complaint.

5. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information from confidential informants, and my training and experience and the training and experience of other law enforcement agents with whom I have consulted.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Background on Pill Manufacturing

6. This complaint references certain equipment used to manufacture counterfeit pills. The following terms are used throughout this affidavit:

a. A “pill press” is a device used to manufacture pills from powder substances. Tableting machines vary in design and complication and can range in price from several hundred dollars to several thousands of dollars, depending in part on whether they are automated or manual. Tableting machines may be designed to create a single pill or thousands of pills within a relatively short time.

b. A “binding agent” or “binding powder” is a powder that is used to promote cohesiveness and mix together the other ingredients in the pills being made.

c. A “pill punch” or “punch” is a tool used to compress the powder into a pill and imprint the pill with a logo or design. Punches often resemble long, thin steel cylinders and often include a specific imprint, which allows an end user to differentiate among different types of pills.

7. To create a pill, the user places a powder and a binding agent into a mold, often by using a funnel. Depending on the type of tableting machine being used, the user then either activates a hand crank or hammers down on a punch to compress the powder into a pill that is the shape of the mold and bears the imprint of the punch.

8. In my training and experience, the importation and subsequent distribution of punches that contain counterfeit drug markings—that mimic, for example, the “M30” marking that appears on oxycodone 30 milligram pills—enable individuals to manufacture large quantities of illegal drugs that often contain varying amounts of scheduled drugs, including fentanyl and other substances. These pills are heavily abused and trafficked throughout the United States. They are also highly dangerous, as fentanyl is a more lethal substance than the counterfeit drugs that the pills are designed to resemble. Thus, end users who consume pills that they believe to be consistent with the counterfeit imprint, but that actually contain fentanyl, face a risk of misusing the pills or overdosing.



Authentic oxycodone M30 tablets (top) versus counterfeit oxycodone M30 tablets containing fentanyl (bottom).¹

9. Illicitly produced pills frequently contain varying amounts of controlled substances that are of a varying strength. The mixing and milling of such substances are inconsistent and often take place in clandestine laboratories that are unregulated.

¹ See Department of Justice, *Counterfeit Pills*, DRUG ENFORCEMENT ADMINISTRATION DRUG FACT SHEET, available at <https://www.dea.gov/sites/default/files/2021-05/Counterfeit%20Pills%20fact%20SHEET-5-13-21-FINAL.pdf>.

B. Background on Confidential Source and First Shipment to the Wentworth Residence

10. In or around December 22, 2021, DEA Chicago received information from a confidential source (CS-1)² who historically has been involved in selling tablet compressing machines and narcotics “cutting agents” to locations around the United States. CS-1 informed law enforcement that s/he had received an order for 100 kilograms of white binding powder, two M-30 punches, and 500 grams of dark blue binding agent.

11. Specifically, on or about December 13, 2021, CS-1 received an email sent at approximately 10:58 p.m. from the email address salessandro@gmail.com and the name “alessandro Smith.” The e-mail stated, “I need 2 sets of M 30 dies for a 1.5 machine. Also my standard 20 pounds of white premix, and a dark blue color 500 mg. Let me know how soon you can ship 60621. If I can get better pricing for larger pre-mix orders let me know. 50 or 100 pound increments.” Based on my training and experience, conversations with CS-1, and the subsequent shipment CS-1 made, I believe that in this e-mail, CS-1 was instructed to send the 100 kilograms of white binding powder, two M-30 punches, and 500 grams of dark blue binding agent to 642 Wentworth Avenue, Calumet City, Illinois (the “Wentworth Residence”).

² CS-1 has been charged with federal narcotics and drug counterfeiting-related offenses. CS-1 is cooperating with law enforcement in hopes of receiving consideration relating to these charged offenses. Additionally, CS-1 has been paid and is expecting payment for direct expenses related to his/her cooperation, including but not limited to, the payment for binding agent described in this affidavit. CS-1 has proven reliable and credible, and information provided by CS-1 has led to multiple narcotics seizures and has been corroborated by independent investigation that includes fruitful seizures and recorded conversations conducted by law enforcement.

12. Based on my training and experience, binding powder, M-30 punches, and dark blue binding agent would be used to manufacture counterfeit oxycodone 30 milligram pills, which are blue in color. As explained above, counterfeit pills often contain varying amounts of scheduled drugs, including fentanyl and other substances.

13. On or about December 14, 2021, at the direction of law enforcement, CS-1 sent a recorded³ text message to (312) 498-6006, which stated, "\$7200 is the total," meaning the total payment due for the order of binding powder, M-30 punches, and dark blue binding agent. CS-1 sent additional text messages with an address and instructions to send the tracking information for the payment to a P.O. Box CS-1 was using. The address CS-1 provided was actually an undercover capacity ("UC") government mailbox.

14. On or about December 16, 2021, at approximately 10:49 a.m., CS-1 received a recorded text message from (312) 498-6006 which included a photograph of a USPS tracking receipt. In response, CS-1 sent a recorded text message to (312) 498-6006, which stated, "I need the shipping w," meaning CS-1 was asking where to send the shipment. Shortly thereafter, CS-1 received a recorded text message from (312) 498-6006, which stated, "Esagrp.org. 642 Wentworth, Calumet city IL 60409."

³ Law enforcement took pictures of the text message conversations between CS-1 and the individual using the phone number (312) 498-6006. The text message conversations include timestamps of when messages were sent and when messages were received. Those timestamps are on eastern standard time.

15. On or about December 18, 2021, at approximately 12:27 p.m., CS-1 received a recorded text message from (312) 498-6006, which stated, "Your small box is there let me know my tracking when u get it ty."

16. On or about December 20, 2021, at approximately 10:10 a.m., CS-1 sent a recorded text message to (312) 498-6006, which stated, "We will send it soon."

17. Law enforcement instructed CS-1 to proceed with the shipment of the 100 kilograms of white binding powder and to purposefully delay the shipment of the two M-30 punches and the 500 grams of dark blue binding agent.

18. On or about December 22, 2021, DEA Chicago notified the Chicago Police Department ("CPD") Postal Team that a shipment of 100 kilograms of white binding powder, addressed to Alessondro Smith at the Wentworth Residence, would be arriving in Calumet City, Illinois, 60649.⁴

19. On or about December 27, 2021, at approximately 3:43 p.m., CS-1 sent a recorded text message to (312) 498-6006, which included a screenshot of tracking numbers followed by a text message that stated, "10 boxes with UPS."

20. On or about December 30, 2021, at approximately 8:00 a.m., the CPD Postal Team took possession of ten medium-sized shipping boxes, each addressed to Alessondro Smith at the Wentworth Residence. The ten boxes were shipped via UPS Ground Shipping and each measured approximately 16 inches x 12 inches x 12 inches and weighed approximately 20 to 25 pounds.

⁴ On or about December 23, 2021, December 27, 2021, and December 29, 2021, law enforcement conducted physical surveillance at the Wentworth Residence.

21. On or about December 30, 2021, at approximately 1:30 p.m., law enforcement recovered a small flat rate USPS box from the UC government mailbox and delivered the box to CS-1. CS-1 opened the box in law enforcement's presence. The box contained a metal case that was wrapped in plastic and duct taped. The case contained \$7,200 in \$100 bills. Based on my training and experience, drug traffickers often use metal cases and plastic wrapping to ship United States currency and other contraband in order to avoid detection.

C. January 3, 2022: 100 Kilograms of Binding Agent Delivered to the Wentworth Residence

22. On or about January 3, 2022, at approximately 10:37 a.m., two CPD Postal Team members, wearing United Parcel Service ("UPS") uniforms, arrived at the Wentworth Residence⁵ in a UPS truck to make a controlled delivery of the ten boxes of binding agent.

23. The two CPD Postal Team members knocked on the front door of the Wentworth Residence and rang the doorbell. After no answer, law enforcement (that was simultaneously conducting physical surveillance of the Wentworth Residence)

⁵ The Wentworth Residence is a single-family home, located on a corner lot at 642 Wentworth Avenue, Calumet City, Illinois, 60649. The residence is a multi-story home, with beige and red brick siding and a shingled roof. A long driveway runs along the south side of the Wentworth Residence and leads to a double garage. A concrete driveway runs along the west side of the Wentworth Residence. The concrete driveway is parallel to an alley that is perpendicular to 153rd Street. There appears to be three visible doors in and out of the Wentworth Residence. The front door, which leads out to a porch and a small flight of front steps, is located on the east side of the house facing Wentworth Avenue; one side door is on the north side of the house facing 153rd Street; and the back door is on the west side of the house facing the back concrete driveway and alley. Another side door may be located on the south side of the house and lead directly into the two-car garage, but that entry point is not visible from the exterior of the home.

directed the Postal Team members to leave the ten boxes on the front porch of the Wentworth Residence. The Postal Team members left the boxes, as directed, and exited the Wentworth Residence at approximately 10:40 a.m.

24. At approximately 11:52 a.m., law enforcement observed a male—approximately 40 years old, with a goatee, and wearing a black skull cap and black pants (“Wentworth Suspect 1”)—exit the front door of the Wentworth Residence, observe his surroundings, and take the boxes inside the Wentworth Residence.

25. At approximately 3:02 p.m., law enforcement observed a gray Ford Explorer, bearing the license plate CS60716,⁶ arrive at the Wentworth Residence. Law enforcement further observed three unidentified males exit the Ford Explorer and walk to the back of the Wentworth Residence. Wentworth Suspect 1 met the three males at the back of the Wentworth Residence, and all four males entered the Wentworth Residence through the back door.

26. At approximately 6:35 p.m., law enforcement observed three unidentified males exit the north side door of the Wentworth Residence and walk down the steps. Law enforcement observed one unidentified male carrying a box that matched the size and shape of the boxes that were delivered to the Wentworth Residence at 10:40 a.m. that morning. Law enforcement observed the three unidentified males, including the male carrying the box, enter the Ford Explorer and drive away from the Wentworth Residence.

⁶ The Ford Explorer is registered to Sental Services at 4242 Ogden Avenue in Downers Grove, Illinois.

27. Law enforcement followed the Ford Explorer and observed the vehicle parallel park on the 4800 block of South Vincennes Avenue, Chicago, Illinois at approximately 7:38 p.m. The driver exited the vehicle, left the lights on, and conversed with an individual on the sidewalk for several minutes. After the conversation, at approximately 7:46 p.m., the driver reentered the Ford Explorer and traveled westbound.

28. At approximately 8:05 p.m., the Ford Explorer arrived at the 700 block of West 51st Street, Chicago, Illinois. The Ford Explorer parked at the back of a residence (the "51st Street Residence"), where approximately ten other vehicles were parked. The driver exited the Ford Explorer and entered the back of the residence.

29. Law enforcement searched law enforcement databases to identify the names of residents of the Wentworth Residence. Law enforcement then cross-referenced the resident results with photographs and identified the driver of the Ford Explorer as CLARK.⁷

⁷ In approximately April of 2021, CLARK was temporarily detained during a controlled delivery of narcotics to his house, where bulk quantities of suspect narcotics, including multiple brick-shaped objects that field tested positive for fentanyl, and several firearms were recovered. CLARK was released and began cooperating with law enforcement. CLARK has prior felony convictions for narcotics-related offenses and was on parole when he was detained in March of 2021. In September of 2021, CLARK had access to bulk quantities of substances that field tested positive for fentanyl. Specifically, approximately 26 kilograms of narcotics that tested positive for fentanyl were delivered to CLARK at the 51st Street Residence. CLARK provided 7 kilograms to a target drug and money courier. CLARK provided the remaining 19 kilograms of narcotics to law enforcement. CLARK worked with law enforcement to arrange a meeting to deliver sham cash to the target drug and money courier. CLARK does not have any pending criminal charges but was cooperating with law enforcement in the hopes of receiving consideration in any future potential charging and sentencing recommendations. No promises were made to CLARK regarding what potential term of incarceration CLARK may face.

D. January 5, 2022: CLARK Investigatory Stop

30. On or about January 5, 2022, at approximately 11:14 a.m., law enforcement observed an unidentified male with an afro hairstyle and a goatee (“Wentworth Subject 2”) exit the back of the 51st Street Residence, enter the gray Ford Explorer, exit southbound via the east alley of Halsted Street, and travel westbound on 51st Street. At approximately the same time, law enforcement observed CLARK and an unidentified female wearing a red jacket exit the back of the 51st Street Residence. CLARK was carrying a black gym bag that appeared to be full. CLARK put the black gym bag in a Honda Civic Hybrid parked in the rear of the residence, bearing the license plate CS 60717, and the unidentified female wearing the red jacket entered the front passenger’s seat of the Honda.⁸ Moments later, law enforcement observed a Toyota Camry pull up to the 51st Street Residence and drop off another unidentified male. CLARK escorted the male inside the 51st Street Residence, exited the 51st Street Residence, and entered the driver’s seat of the Honda. The Honda traveled southbound via the east alley of Halsted Street and then traveled eastbound on 51st Street.

31. Law enforcement followed the Honda, first to a residence on the 5700 block of South Indiana Avenue, Chicago, Illinois (“Indiana Avenue Residence”). At approximately 11:19 a.m., the unidentified female wearing the red jacket exited the

⁸ The Honda Civic is registered to Central Services at 4242 Ogden Avenue in Downers Grove, Illinois. This registered business appears to be the same business, albeit using a different spelling, that is registered to the Ford Explorer.

Honda and entered the Indiana Avenue Residence. The Honda drove away from the Indiana Avenue Residence, followed by law enforcement.

32. At approximately 11:36 a.m., the Honda arrived at a tire and automobile repair shop at the corner of West 47th Street and South Normal Avenue in Chicago, Illinois and parked in the repair shop parking lot. Law enforcement observed a white Ford pick-up truck, bearing the business label, "All-American Built-1," in the same parking lot. Law enforcement observed CLARK exit the Honda and converse with an unidentified individual in the Ford pick-up truck. Law enforcement also observed CLARK retrieving numerous plastic bags from the back seat and trunk of the Honda and placing unknown items into the plastic bags.

33. At approximately 11:50 a.m., a gray Jeep Rubicon,⁹ bearing the license plate CH33684, arrived in the repair shop parking lot.¹⁰ The unidentified female wearing the red jacket exited the driver's side of the Jeep Rubicon, and CLARK handed items to the unidentified female, who immediately placed those items in the Jeep Rubicon. Law enforcement observed CLARK and the unidentified female moving the items to the Jeep Rubicon in a hurried manner.¹¹ At approximately 11:52

⁹ On or about January 4, 2022, at approximately 8:30 a.m., law enforcement observed the Jeep Rubicon parked at the 51st Street Residence. Law enforcement also recognized a red dump truck bearing the same "All-American Built-1" logo as the white pick-up truck parked at the Wentworth Residence.

¹⁰ The Jeep Rubicon is registered to Individual A at an address in Matteson, Illinois. During the January 5, 2022 investigatory stop, the female wearing the red jacket in the Jeep Rubicon identified herself to law enforcement as Individual A. According to law enforcement databases, Individual A lives at the Indiana Avenue Residence.

¹¹ Law enforcement did not observe CLARK's black gym bag being removed from the Honda Civic.

a.m., the Ford pick-up truck exited the parking lot and traveled northbound on Normal Avenue. Moments later, CLARK entered the driver's seat of the Jeep Rubicon, and the unidentified female entered the passenger's side. The Jeep Rubicon traveled westbound on 47th Street.

34. Law enforcement followed the Jeep Rubicon to a Walgreens parking lot on West 47th Street and South Halsted Street. Law enforcement lost sight of the Jeep Rubicon for approximately twenty seconds. The Jeep Rubicon emerged back in view as it drove out to West 47th Place and South Halsted Street.

35. Minutes later, at approximately 12:01 p.m., law enforcement made an investigatory stop of the Jeep Rubicon at the 800 block of West 53rd Place, Chicago, Illinois. The driver identified himself as Troy CLARK. Law enforcement searched the Jeep Rubicon and did not discover any contraband.

E. Observations of CLARK at the Wentworth Residence

36. On or about January 10, 2022, at approximately 11:38 a.m., law enforcement observed a white box truck, bearing the license plate CL91709,¹² parked in the rear driveway of the Wentworth Residence. It appeared that the box truck had backed into the rear driveway and parked just a few feet from the back door of the Wentworth Residence. At approximately 11:50 a.m., law enforcement observed CLARK, Wentworth Subject 1, Wentworth Subject 2, and another unidentified male standing at the back of the box truck. Law enforcement observed the four males

¹² The white box truck is registered to Corporation Central S at 8237 South Wabash Street, Chicago, Illinois.

unload several large items from the box truck and into the Wentworth Residence, making trips back and forth for approximately 20 minutes. These items included large black totes, several other storage totes, large duffel bags, a box bearing a picture of a humidifier that appeared to be new, and an approximately four-foot-long table with an object that resembled a spindle or wheel on top. Wentworth Subject 2 carried the humidifier. Law enforcement observed CLARK and Wentworth Subject 2 struggling to carry the table with the spindle-like object on top, apparently due to its weight.

37. Based on my training and experience, the spindle closely resembled a pill press, which can weigh hundreds of pounds. Also based on my training and experience, I understand that higher levels of humidity in a laboratory can help bind pill powder. Based on all of these facts, I believe CLARK and these other individuals may have been transporting materials to the Wentworth Residence in anticipation of the arrival of the binding agent and M-30 punches, in order to manufacture fraudulent M-30 pills.

38. On or about January 14, 2022, law enforcement conducted physical surveillance of the Wentworth Residence and observed the box truck parked in the driveway on the south side of the Wentworth Residence. Law enforcement also observed CLARK and Wentworth Subject 2 drive the Ford Explorer out of the double garage.

39. On or about January 18, 2022, law enforcement conducted physical surveillance of the Wentworth Residence and observed the Jeep Rubicon and the Ford

Explorer parked in the rear driveway of the Wentworth Residence and the white box truck parked in the south driveway of the Wentworth Residence.

40. On or about January 19, 2022, law enforcement conducted physical surveillance of the Wentworth Residence and at approximately 8:55 a.m., observed the white box truck parked in the south driveway and the Honda Civic parked in the rear driveway. At approximately 9:31 a.m., law enforcement observed a male resembling CLARK walk onto the Wentworth Residence porch, take a picture of himself with a mobile device, and walk back into the residence.

F. Latest Communications between CS-1 and “Smith”

41. On or about January 18, 2022, at 2:46 p.m., CS-1 sent a recorded text message to (312) 498-6006, which stated, “I’m didn’t forget about the binder and m30 punches. I’ll send as soon as they come in.” According to CS-1, on or about January 22, 2022, CS-1 received an unrecorded text message from (312) 498-6006 in response that stated, “I know. Ty,” meaning that the individual using the name Alessondro Smith was acknowledging that CS-1 was sending the shipment.

42. On or about January 21, 2022, law enforcement picked up the binding agent from CS-1.

G. February 1, 2022: DEA Located Over 400 Grams Fentanyl and Other Pill Manufacturing Materials at the Wentworth Residence

43. On or about January 31, 2022,¹³ Magistrate Judge Maria Valdez determined there was probable cause to search the Wentworth Residence upon the

¹³ Also on or about January 31, 2022, at approximately 6:42 p.m., law enforcement conducted physical surveillance of the Indiana Residence and the Wentworth Residence. Law enforcement observed CLARK pick up Individual A from the Indiana Residence and drive to

controlled delivery of a mail parcel¹⁴ that contained one pill press punch stem with a “M” marking and a bag of 500 grams of blue binding agent. Judge Valdez issued an anticipatory search warrant in 22 M 78 and a tracking warrant in 22 M 79.



the Wentworth Residence. Law enforcement observed that once CLARK entered the Wentworth Residence on the evening of January 31, 2022, he did not leave the Wentworth Residence at any point before the search warrant was executed on February 1, 2022.

¹⁴ The parcel was small shipping box with a USPS label that bore tracking number 9210 8901 7554 7700 0022 3241 61. CS-1 provided the USPS label to law enforcement.

44. As contemplated by the search warrant, law enforcement included a filament detection device, which emits a recognizable signal to law enforcement when a package is opened, and an electronic tracking device, which enables law enforcement to monitor the movement of a package via GPS, in the mail parcel. Law enforcement also included a powder substance in the mail parcel that is visible using a black light. In my training and experience, law enforcement will include this powder substance in controlled delivery parcels to help determine which suspect or suspects handled the parcel. When the black light captures the powder on a suspect's hands, face, and/or body, it is likely that the suspect handled the package that contained that powder.

45. On or about February 1, 2022, at approximately 10:15 a.m., United States Postal Inspection Service ("USPIS") postal inspectors, at the direction of DEA Chicago, approached the Wentworth Residence with a mail parcel containing a purposefully incomplete M-30 punch set,¹⁵ 500 grams of binding agent, a filament detection device, an electronic tracking device, and black light powder. Postal inspectors knocked and rang the doorbell at the front, east-facing door of the Wentworth Residence. Postal inspectors placed the parcel on the ground of the front porch.

¹⁵ Importantly, a complete pill press punch would include a stem with the "M" marking and a stem with the "30" marking in order to press the standard M-30 marking on an oxycodone 30 milligram pill. Here, law enforcement delivered half of the M-30 punch set, making the punch set incomplete.

46. At approximately 10:17 a.m., law enforcement observed a male resembling Wentworth Subject 1 exit the front, east-facing door of the Wentworth Residence and pick up the parcel from the ground, while the postal inspectors were still standing on the front porch. Wentworth Subject 1 then reentered the Wentworth Residence carrying the parcel.

47. At approximately 11:52 a.m., law enforcement received an alarm notification that the parcel was opened and had been moved. Immediately following that trigger, law enforcement executed the anticipatory search warrant in 22 M 78 and entered the Wentworth Residence.

48. Upon entering the north-facing door, law enforcement immediately encountered CLARK and a woman who identified herself as Individual A sitting at the first-floor kitchen table. The individual resembling Wentworth Subject 1 was located on a couch in the room next to the kitchen. Law enforcement further observed the controlled delivery parcel open on the kitchen countertop. The yellow envelope that contained the pill press punch stem remained unopened and sealed but had been removed from the parcel and placed on the kitchen countertop. Law enforcement observed that the blue binding agent was still inside the opened parcel.

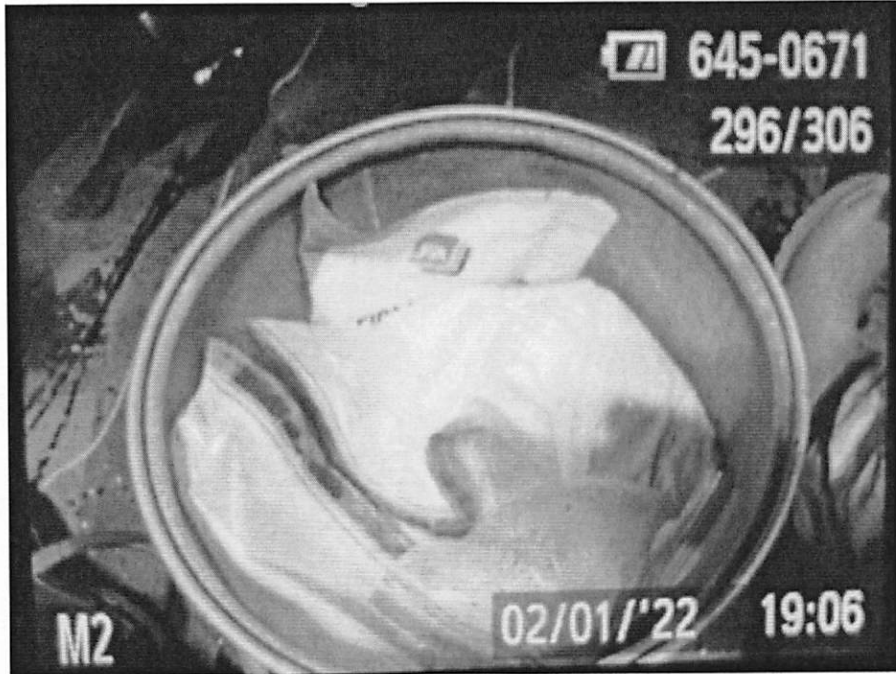
49. Law enforcement scanned CLARK using the black light and observed significant powder residue on his face, hands, and clothes.

50. During a search of the Wentworth Residence basement, law enforcement located a fiber drum that contained several large Ziploc bags of powder and crystal-like substances, as further described below.

51. Law enforcement recovered at least six Ziploc bags of a white powdery substance from the fiber drum. Law enforcement field tested two of the six bags, and both bags field-tested positive for the probable presence of fentanyl. Based on training and experience, law enforcement estimated that each of the two bags were approximately the same size and weight and contained approximately two kilograms of the white powdery substance.

52. Law enforcement also recovered four other large Ziploc bags from the fiber drum. Two bags contained a white crystal-like substance that field-tested positive for boric acid. Based on my training and experience, boric acid can be used as a filler in pills and in other controlled substance mixtures. A third bag contained a yellow powder that appeared to be a dye substance. A fourth bag contained a red powder that also appeared to be a dye substance.





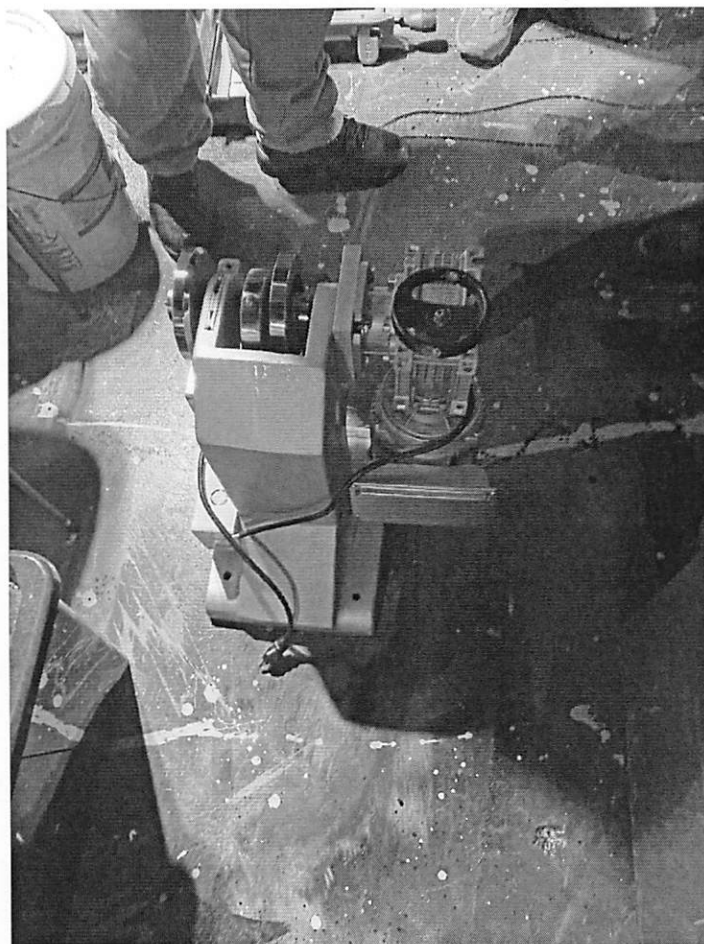
53. In the basement, law enforcement further observed an empty storage cabinet covered in residue from what appeared to be a white powder. The residue field-tested positive for the probable presence of fentanyl.

54. Law enforcement also located a box in the basement that contained at least seven bags of powdery substances. Based on training and experience, law enforcement estimated that each of the bags contained approximately one kilogram of powdery substances. Law enforcement observed that each bag contained a powder in a different color (orange, pink, blue, etc.) and that already appeared to be a mixture of more than one substance. Law enforcement field tested one of these bags, and the mixture field-tested positive for the probable presence of methamphetamine.

55. Law enforcement further observed ten medium-sized shipping boxes that resembled the boxes containing 100 kilograms of binding agent that were

delivered on January 3, 2022. Law enforcement observed that one box was opened, but the nine other boxes were unopened.

56. Additionally, law enforcement recovered several pieces of equipment that can be used to manufacture pills, including a pill press (which was contained in a large plastic bin), a funnel, and metal press and die pieces. Law enforcement observed that one metal press bore the marking, “K 55.” Based on my training and experience, pills with the imprint, “K 55” are typically homotropine methybromide or hydrocodone bitartrate pills, which are opioid pain medication.



57. Finally, law enforcement recovered at least one gun suppressor, two RF detectors (which based on my training and experience, are used to detect the presence

of unwanted radio transmitters (i.e., a “bug”), and approximately five cellular devices.

H. February 1, 2022: CLARK Interview

58. At approximately 8:30 p.m., I, along with other federal law enforcement officers, conducted an unrecorded interview of CLARK. CLARK was advised of his rights pursuant to *Miranda* and agreed to speak with law enforcement.

59. CLARK stated that he placed the order for the binding powder, the punches, and “blue dye” on behalf of a friend. CLARK stated that he mailed between \$5,000 and \$10,000 as payment in exchange for the order. CLARK stated that he wrapped the currency and placed the wrapped currency in a priority mail cardboard box. CLARK explained that the binding powder arrived in one delivery, and the punches and blue dye arrived in a second delivery on February 1, 2022. CLARK denied any knowledge of fentanyl or any other controlled substances in the Wentworth Residence.¹⁶


II. CONCLUSION

Based on the foregoing, I respectfully submit that there is probable cause to believe that on or about February 1, 2022, at Calumet City, in the Northern District of Illinois, Eastern Division, TROY CLARK possessed with intent to distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-

¹⁶ After answering several questions, CLARK stated that he wanted to speak with his attorney, and law enforcement immediately terminated the interview.

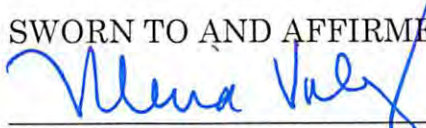
piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.



BLAKE SMITH
Special Agent, Drug Enforcement
Administration

SWORN TO AND AFFIRMED by telephone February 2, 2022.



Honorable MARIA VALDEZ
United States Magistrate Judge