

FILED

FEB 02 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Clerk of Court, United States District Court
Ohio Northern District - CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAMIEN ROGER MARCEL STAFFORD,
aka KD,
CHEZERA E. FLOYD,
LUCIAN D. BLACKWELL,
CRAIG L. JOHNSTONE, aka Twin,
RAUSHEEDA L. HYSHAW,
ANTWAIN D. STEWART, aka Fat Twan,
aka Twan,
RICKY LYNN VAUGHN, aka Longface,
CLIFFORD E. STAFFORD,
DORSHAUN R. TUCKER,
ALEXANDER PRIETO,
MARIAN RIPLEY,
TRAVIS BLANKENSHIP,
JESSICA MCCLANAHAN,

Defendants.

) SUPERSEDING
) INDICTMENT

) JUDGE SARA LIOI

) CASE NO. 5:21CR736

) Title 18, United States Code,
) Sections 922(g)(1), 924(a)(2),
) and 924(c)(1)(A)(i); Title 21,
) United States Code, Sections
) 841(a)(1), (b)(1)(A), (b)(1)(B),
) (b)(1)(C), 843(b), 846, and
) 856(a)(2)

COUNT 1

(Conspiracy to Possess with Intent to Distribute Methamphetamine, Fentanyl, Valeryl Fentanyl,
and Cocaine, 21 U.S.C. § 846)

The Grand Jury charges:

1. From in or around April 2021, and continuing to in or around September 2021,
the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division,
and elsewhere, Defendants DAMIEN ROGER MARCEL STAFFORD, aka KD; CHEZERA E. FLOYD;
LUCIAN D. BLACKWELL; CRAIG L. JOHNSTONE, aka Twin; RAUSHEEDA L.

HYSHAW; ANTWAIN D. STEWART, aka Fat Twan aka Twan; RICKY LYNN VAUGHN, aka Longface; CLIFFORD E. STAFFORD; DORSHAUN R. TUCKER; ALEXANDER PRIETO; MARIAN RIPLEY; TRAVIS BLANKENSHIP; and JESSICA MCCLANAHAN, and others, known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others, known and unknown to the Grand Jury, to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); 100 grams or more of a mixture and substance containing a detectable amount of valeryl fentanyl, a schedule I controlled substance and an analogue of fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); and a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

2. Before Defendant DAMIEN ROGER MARCEL STAFFORD committed the offense charged in this count, the defendant had a final conviction for a serious violent felony, namely, a conviction under Ohio Revised Code section 2911.01(A)(1), Aggravated Robbery, for which he served more than 12 months imprisonment, in case number 2007-08-2834, in the Court of Common Pleas of Summit County, Ohio, on or about February 28, 2008.

3. Before Defendant CRAIG L. JOHNSTONE committed the offense charged in this count, the defendant had final convictions for serious drug felonies, namely, a conviction under Title 21, United States Code, Section 841(a)(1), Distribution of a Controlled Substance, for

which he served more than 12 months imprisonment, in case number 5:02CR255, in the United States District Court for the Northern District of Ohio, on or about November 14, 2002; and a conviction under Ohio Revised Code section 2925.03(A)(2), Trafficking in Cocaine, for which he served more than 12 months imprisonment, in case number 2014-06-1785-B, in the Court of Common Pleas of Summit County, Ohio, on or about January 26, 2015.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that:
 - a. DAMIEN ROGER MARCEL STAFFORD purchased methamphetamine, fentanyl, and cocaine from drug suppliers in Cleveland, Ohio, South Carolina, and elsewhere for distribution.
 - b. PRIETO and others sold methamphetamine to DAMIEN ROGER MARCEL STAFFORD for redistribution.
 - c. DAMIEN ROGER MARCEL STAFFORD used VAUGHN, JOHNSTONE, FLOYD, BLACKWELL, STEWART, and others to distribute methamphetamine, fentanyl, and cocaine to drug customers.
 - d. DAMIEN ROGER MARCEL STAFFORD used HYSHAW, FLOYD, BLANKENSHIP, MCCLANAHAN, CLIFFORD E. STAFFORD, TUCKER, BLACKWELL, RIPLEY, and others to transport methamphetamine, fentanyl, and cocaine to various locations for distribution.
 - e. Members of the conspiracy communicated using cellular telephones to further the drug trafficking activity of the conspiracy.

f. DAMIEN ROGER MARCEL STAFFORD and other members of the conspiracy maintained and used residences in Akron, Ohio, as locations at which to store and distribute controlled substances.

g. DAMIEN ROGER MARCEL STAFFORD employed drug “testers” to evaluate the strength and quality of controlled substances intended for sale.

ACTS IN FURTHERANCE OF THE CONSPIRACY

5. In furtherance of the conspiracy, and to affect the goals and conceal the existence thereof, Defendants and others performed acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:

a. On or about April 15, 2021, at approximately 10:23 p.m., DAMIEN ROGER MARCEL STAFFORD called an unidentified male (UM-1) on the telephone. DAMIEN ROGER MARCEL STAFFORD asked, “Hard (crack cocaine)?” UM-1 responded, “Yeah, yeah.” Later in the call, UM-1 explained, “It was like a lot crumbs...I still got it in the napkin.” DAMIEN ROGER MARCEL STAFFORD later stated, “I’ve been out of town, for like five days now. I don’t know what the f—k is goin’ on over there.” UM-1 replied, “Right, man, ‘cause I’m – listen, this is the first time that I seen – I opened the door – I’m like (unintelligible) how’s a white girl answering the door?...Then she asked (unintelligible), ‘You want this or you want that?’ I said, ‘Nah, I want hard.’” DAMIEN ROGER MARCEL STAFFORD later stated, “Yeah, she takin’ over for Longface (VAUGHN).”

b. On or about April 16, 2021, at approximately 5:06 p.m., an unidentified male (UM-2) called DAMIEN ROGER MARCEL STAFFORD on the telephone. UM-2 stated, “Sh-t, I just wanted to let you know, or whoever’s over there...I don’t need my money back or nothing, but there’s some sh-t in it.” UM-2 went on to state, “It’s hard to tell. It’s almost like it

gels up...Like I don't know it's weird. I don't know if it's a pill or what?" DAMIEN ROGER MARCEL STAFFORD asked, "What color?" and UM-2 replied, "It's like beige, but there's specs of white in it too." DAMIEN ROGER MARCEL STAFFORD then asked, "How much you spent?" and UM-2 replied, "I got three." DAMIEN ROGER MARCEL STAFFORD said, "You spent three?" and UM-2 replied, "Yeah, I got three... g's (three grams of controlled substance)." DAMIEN ROGER MARCEL STAFFORD then stated, "Man, why ain't you call me before you went over there?" On the same date, at or about 5:13 p.m., DAMIEN ROGER MARCEL STAFFORD and UM-2 spoke again by telephone. UM-2 stated that he "tried to dissolve it to bang (inject) it, but I can't." DAMIEN ROGER MARCEL STAFFORD responded, "Did you get to do any of it yesterday? Did any of it work yesterday?" UM-2 replied, "No, I've been snorting it."

c. On or about April 18, 2021, at approximately 11:28 a.m., DAMIEN ROGER MARCEL STAFFORD called T.G., a female whose identity is known to the Grand Jury, on the telephone and asked, "My dude came over there?" T.G. replied, "The one with the black truck? Yes." DAMIEN ROGER MARCEL STAFFORD responded, "What he had?" T.G. answered, "He only got 40 (\$40 worth of drugs) because he don't like the white colored sh-t." DAMIEN ROGER MARCEL STAFFORD asked, "You didn't give him the sh-t that Twan (STEWART) just dropped off?" T.G. replied, "I didn't have it then. He don't like the white sh-t. Now that I have it, tell him to come back."

d. On or about April 19, 2021, at approximately 12:31 a.m., C.R., a female whose identity is known to the Grand Jury, called DAMIEN ROGER MARCEL STAFFORD on the telephone. C.R. asked, "Can I come through (come to a particular location to obtain drugs from DAMIEN ROGER MARCEL STAFFORD)?" DAMIEN ROGER MARCEL STAFFORD

replied, "Uh...Let me call and see if somebody is there." Approximately four minutes later, DAMIEN ROGER MARCEL STAFFORD called STEWART on the telephone. Approximately two minutes later, C.R. called DAMIEN ROGER MARCEL STAFFORD and asked, "Can I go there (to the drug location) or not?" DAMIEN ROGER MARCEL STAFFORD replied, "Call Twan. Nobody there. Call Twan (STEWART)." When C.R. asked, "Call who?" DAMIEN ROGER MARCEL STAFFORD replied, "Fat Twan (STEWART)." Approximately one minute later, C.R. called STEWART on the telephone.

e. On or about April 20, 2021, at approximately 6:40 p.m., DAMIEN ROGER MARCEL STAFFORD sent a text message which read, "2344176248," to at least fifteen recipients. The phone number contained in the text message belonged to STEWART. At approximately 6:43 p.m., one of the recipients of the text message replied by text message, "What's that number?" DAMIEN ROGER MARCEL STAFFORD responded by text message, "Twan (STEWART)."

f. On or about April 20, 2021, at approximately 6:49 p.m., an unidentified individual sent DAMIEN ROGER MARCEL STAFFORD a text message asking, "U still in the Heights?" DAMIEN ROGER MARCEL STAFFORD replied by text message, "1133 morningview." The unidentified individual sent DAMIEN ROGER MARCEL STAFFORD a text message asking, "Twans??" DAMIEN ROGER MARCEL STAFFORD responded by text message, "Yup."

g. On or about May 6, 2021, at approximately 9:31 p.m, STEWART called an unidentified female (UF-1) on the telephone. During the conversation, STEWART asked, "Which way do you want it? You want it already put together (mixed with a cutting agent) or you want it raw (no cutting agent added)?" Later in the call STEWART inquired, "What you

want me to bring?” UF-1 replied, “Um...If it’s good, bring, uh, probably a ball (an “eight-ball” or one-eighth ounce of controlled substance).” STEWART responded, “Ok. I’m on my way right now. I’m coming from the east side.”

h. On or about May 7, 2021, at approximately 8:21 a.m., an unidentified female (UF-2) called STEWART on the telephone and asked, “Hey can we come meet you?” STEWART replied, “What you wanna do?” UF-2 stated, “Uh...half (an unknown quantity of controlled substance)...I got 50. Actually, I got 80.” STEWART replied, “Alright. I’m, uh, I’m actually at the hotel on Arlington.” UF-2 said, “Oh, ok. I should be there like...where you at about 20 minutes.” Approximately 10 minutes later, UF-2 called STEWART and asked, “Hey, did you already make mine up?” She then added, “Can you do a whole one (an unknown quantity of controlled substance)? I got enough.”

i. On or about May 7, 2021, at approximately 10:09 a.m., an unidentified male (UM-3) called STEWART on the telephone. UM-3 informed STEWART, “I was getting ready to shoot a couple moves and sh-t. I’m about to get brother’s money, though.” STEWART asked, “Sh-t, you think you could pull up on me this round?” STEWART and UM-3 discussed where to meet. At approximately 10:44 a.m., UM-3 called STEWART on the telephone. During the conversation, UM-3 stated, “I woke KD (DAMIEN ROGER MARCEL STAFFORD) up and sh-t this morning and sh-t, right...So I know it’s early as f—k in Cali (California), right?...I said, ‘Look, bro, I’m sorry, man. You know what I’m sayin’? I got this paper (money) for you, but I really wanted to like wake you up and sh-t and do this’...I said, ‘Bro, you better come and get this money.’...He said, ‘Damn, man...Twan’s (STEWART) probably asleep. I said, ‘Well, you’re gonna have to wake him up, bro.’”

j. On or about May 7, 2021, at approximately 3:26 p.m., an unidentified female (UF-3) called STEWART on the telephone and asked, "Man, can you come through?" STEWART replied, "Yep. What you tryin' to do?" UF-3 responded, "Probably a gram by the time you get here." STEWART said, "Alright. I'm leaving the north side (of Akron). I'm on my way."

k. On or about May 7, 2021, at approximately 8:25 p.m., an unidentified female (UF-4) called STEWART on the telephone and asked, "Hey, how much is your balls (one-eighth ounce of controlled substance)?" STEWART replied, "250." UF-4 then asked, "Can I get 3 for 2?" STEWART responded, "3 for 2? Yeah, if you come to me." UF-4 replied, "Alright."

l. On or about May 8, 2021, at approximately 10:02 a.m., UF-2 called STEWART on the telephone. STEWART asked, "What you was trying to do?" UF-2 replied, "I got seventy (\$70)." STEWART then directed UF-2 where to meet him. At approximately 10:11 a.m., UF-2 called STEWART on the telephone and stated, "I'm about to be there...in one minute. And did you make it already, 'cause, uh, I actually have eighty (\$80)." STEWART replied, "Ok. I got you."

m. On or about May 9, 2021, at approximately 7:09 a.m., UF-2 called STEWART on the telephone and asked, "Can I come meet you?" STEWART said, "What you trying to do?" UF-2 stated, "I got 80 (\$80)." STEWART replied, "Alright...I'm gonna send you the location." At approximately 7:10 a.m., STEWART sent a text message to UF-2 which read, "1088 Morningview."

n. On or about May 11, 2021, at approximately 7:10 a.m., UF-2 called STEWART on the telephone and asked, "Wonder if I can come see you." STEWART replied,

“What you want?” UF-2 stated, “Um, a hundred (\$100 worth of controlled substance).”

STEWART responded, “Alright. Come on.” At approximately 7:46 a.m., STEWART called UF-2 on the telephone and said, “Hey, I want you to go to the west side off Copley (Road) because I ain’t got it all on me....Go to the Save-a-Lot...I’m about ready to go over there right now to get it together.”

o. On or about May 12, 2021, at approximately 7:05 a.m., UF-2 called STEWART on the telephone and asked, “Hey, can I come see you?” STEWART replied, “What you talking about?” UF-2 stated, “Um, a whole one (an unknown quantity of controlled substance).” STEWART replied, “Ok.”

p. On or about May 13, 2021, at approximately 9:37 a.m., an unidentified male (UM-4) called STEWART on the telephone. During the call, UM-4 stated, “N-gga...I waited on you, n-gga. They like...eh...they like that motherf---in’ sh-t right there, bro. That’s better than the white sh-t you had yesterday, bro.” STEWART responded, “It’s the same sh-t, bro...Same dope, same bag.” Later in the conversation, STEWART stated, “I never had no different dope, it’s the same bag of dope.” UM-4 responded, “It’s probably the way you cooked it or something.” STEWART replied, “It’s the same bag. I never switched anything...I haven’t re-upped (replenished supply of drugs) yet.”

q. On or about May 17, 2021, at approximately 4:19 p.m., STEWART sent a text message to UM-2 which read, “Hey are u busy I have a sample I want u to try.” At approximately 4:22 p.m., UM-2 replied by text message, “Yeah I can do that. Give me an hour or so if that’s cool.” At approximately 5:44 p.m., UM-2 sent STEWART a text message which read, “Is the stuff you been giving me gone? Or you just want me to try new stuff?” STEWART replied, “Naw I still have the other jus want u to try something different.” At approximately 7:01

p.m., UM-2 sent STEWART a text message which read, “They both had a bunch of stuff that wouldn’t dissolve in water but I felt the lighter one more.” Approximately three minutes later, STEWART called UM-2 on the telephone and said, “Hey, on a scale of 1 to 10, what you think?” UM-2 replied, “I mean, I wouldn’t want to buy the stuff, just because I can’t suck it up in my rig (syringe) right.” STEWART responded, “Ok, yup, that’s what I want to hear. Alright, let me call you back.” At approximately 7:07 p.m., STEWART again called UM-2 on the telephone and asked, “Ok, on the one you felt the most, on a scale of 1 to 10?” UM-2 answered, “Oh, proly like...It’s a different rush than what I usually get, but I’d say...maybe like, ah, 4 or 5.” STEWART replied, “4 or 5? Ok, the only reason I’m asking...we tryin’ to make this bag right.” UM-2 asked, “Does the dude snort it or bang (inject) it?” STEWART said, “Nah, he (unintelligible) he put it together...he tryin’ to...get a good bag.”

r. On or about May 20, 2021, at approximately 4:50 p.m., an unidentified male (UM-5) called STEWART on the telephone. During the call, UM-5 said, “Man, you know I’m – with this activity, you got another pole (firearm) with you? You got a pole with you?” STEWART replied, “I just got one.”

s. On or about July 12, 2021, at approximately 9:30 p.m., BLANKENSHIP and MCCLANAHAN arrived at 1xx Hollinger Avenue, Akron, Ohio, in a silver Toyota Corolla. BLANKENSHIP and MCCLANAHAN remained at 1xx Hollinger Avenue overnight.

t. On or about July 13, 2021, MCCLANAHAN sent JOHNSTONE a series of text messages asking when the drugs they were expecting would arrive. At approximately 2:09 a.m., MCCLANAHAN sent JOHNSTONE a text message which read, “U try to call this dude again?” At approximately 2:40 a.m., DAMIEN ROGER MARCEL STAFFORD called

JOHNSTONE on the telephone. At approximately 2:44 a.m., JOHNSTONE sent MCCLANAHAN a text message which read, "He just called."

u. On or about July 13, 2021, at approximately 7:41 a.m., DAMIEN ROGER MARCEL STAFFORD arrived at 1xx Hollinger Avenue and entered the residence carrying a bag. DAMIEN ROGER MARCEL STAFFORD departed 1xx Hollinger Avenue at approximately 8:01 a.m. without the bag.

v. On or about July 13, 2021, at approximately 11:49 a.m., MCCLANAHAN sent JOHNSTONE a text message which read, "What's going on? How much longer?" One minute later, JOHNSTONE replied by text, "Sis I'm waiting on him like you are but when he come we're Golden you hear me and I'm giving y'all something bigger."

w. On or about July 13, 2021, at approximately 2:13 p.m., JOHNSTONE arrived at 1xx Hollinger Avenue, followed by FLOYD at approximately 3:51 p.m. At approximately 4:27 p.m., BLANKENSHIP sent JOHNSTONE a text message asking, "Hey what's the plan? When are we leaving and when do we get our stuff? We have been in Ohio since 9pm Friday night. Trying to be cool but come on." One minute later, BLANKENSHIP sent JOHNSTONE another text message which read, "Can you give me some type of time line what are we waiting on?" JOHNSTONE replied by text message, "The rest of the dope be cool sis." At approximately, 4:30 p.m., BLANKENSHIP responded by text message, "So you have some can we have some? I don't have money to buy More and does anyone have ice (methamphetamine)." JOHNSTONE replied by text message, "It's coming be cool did," followed by "sis."

x. On or about July 13, 2021, at approximately 4:31 p.m., DAMIEN ROGER MARCEL STAFFORD arrived at 1xx Hollinger Avenue and entered the residence carrying what

appeared to be a vacuum sealed bag. At approximately 4:44 p.m., FLOYD directed BLANKENSHIP to move the silver Toyota Corolla to the rear of 1xx Hollinger Avenue. FLOYD then entered the residence. At approximately 4:49 p.m., DAMIEN ROGER MARCEL STAFFORD departed 1xx Hollinger Avenue carrying a bag that was noticeably less full than the bag with which he arrived. At approximately 5:20 p.m., BLANKENSHIP and MCCLANAHAN departed 1xx Hollinger Avenue in the silver Toyota Corolla. At approximately 5:22 p.m., JOHNSTONE sent MCCLANAHAN a text message which read, "You can take out 10 gs (grams) when you get there NOTHING else (MCCLANAHAN could take 10 grams of controlled substance as payment for transporting the drugs)." MCCLANAHAN replied by text message, "Ok."

y. On or about July 13, 2021, BLANKENSHIP and MCCLANAHAN possessed approximately 100 grams of fentanyl, 35 grams of cocaine, and 7.7 grams of methamphetamine.

z. On or about August 16, 2021, at approximately 2:01 p.m., Ivory Yates, named but not indicted herein, called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "He had told me to pull up on you." DAMIEN ROGER MARCEL STAFFORD asked, "How far are you away?" Yates replied, "I'm in Cleveland right now." DAMIEN ROGER MARCEL STAFFORD responded, "Ok whenever you're ready to go I'm going to give you the destination." Yates replied, "Alright how far you is away?" DAMIEN ROGER MARCEL STAFFORD answered, "I'm in Akron." Yates said, "Alright let me set up a ride, then." At approximately 8:53 p.m., Yates and DAMIEN ROGER MARCEL STAFFORD again spoke by telephone. Yates asked, "Hey, what's the earliest you be uh hop, gettin' up and stuff? She said she'd shoot out there in the morning." DAMIEN ROGER MARCEL

STAFFORD replied, "I'll be up, you know what I'm sayin'. And if I ain't up, when my phone ring I get up so..." Yates asked, "What I was 'posed to be bringin'? I'm 'finna call and see what's the earliest she can shoot out." DAMIEN ROGER MARCEL STAFFORD replied, "What you had, you got a iPhone?" Yates stated that he did and DAMIEN ROGER MARCEL STAFFORD instructed Yates, "A'right, Facetime a ni--a or summin', man."

aa. On or about August 17, 2021, at approximately 10:15 a.m., Yates met with Tiffany Williams, named but not indicted herein, in Cleveland, Ohio, and provided Williams with a blue and black duffel bag. At approximately 10:17 a.m., Yates called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "She on the road now," adding, "I was waiting for him to call me though." At approximately 10:42 a.m., Yates sent Williams a text message which read, "9xx Valdes," (residence of HYSHAW). At approximately 11:08 a.m., DAMIEN ROGER MARCEL STAFFORD called Yates on the telephone and asked, "How much longer?" Yates answered, "Let me call her and see."

bb. On or about August 17, 2021, Williams possessed a blue and black duffel bag containing approximately 6,292 grams of 100% pure methamphetamine and approximately 2,000 grams of fentanyl.

cc. On or about September 2, 2021, at approximately 12:18 p.m, DAMIEN ROGER MARCEL STAFFORD called an unidentified male (UM-6) on the telephone. UM-6 asked, "What's the deal?" DAMIEN ROGER MARCEL STAFFORD responded, "Sh-t man, about to pop out here. You around?" UM-6 replied, "I'm at the house (unintelligible). Come on man." DAMIEN ROGER MARCEL STAFFORD stated, "Then c'mon, man." UM-6 asked, "Where you at?" DAMIEN ROGER MARCEL STAFFORD answered, "'Bout to be over there behind the liquor store." UM-6 replied, "We doin' all this and I'm in this truck, though."

DAMIEN ROGER MARCEL STAFFORD asked, “You in the highlighter mobile?” UM-6 answered, “Yeah, man.” DAMIEN ROGER MARCEL STAFFORD stated, “Alright, give me a second. Let me see what I can put together. I got you.”

dd. On or about September 2, 2021, at approximately 12:43 p.m., DAMIEN ROGER MARCEL STAFFORD traveled to 9xx Valdes Avenue (HYSHAW’S residence). At approximately 1:12 p.m., DAMIEN ROGER MARCEL STAFFORD called HYSHAW on the telephone and asked, “What time you get off (of work)?” HYSHAW answered, “Two.” DAMIEN ROGER MARCEL STAFFORD stated, “Alright.” HYSHAW asked, “Why? What’s the matter?” DAMIEN ROGER MARCEL STAFFORD replied, “I might need you to make a little run for me. Call me when you get off.” HYSHAW said, “Alright. I’m on the east side (of Akron). Do I got to go home first?” DAMIEN ROGER MARCEL STAFFORD answered, “Yep.” HYSHAW responded, “Ok. I’ll call you when I get off.” At approximately 1:13 p.m., DAMIEN ROGER MARCEL STAFFORD contacted UM-6 and advised, “Man, my driver don’t get off work ‘til 2:00.” Later in the call, UM-6 stated, “Alright. I’ll wait for you to call me and I’ll just come right (unintelligible).”

ee. On or about September 2, 2021, at approximately 2:46 p.m., DAMIEN ROGER MARCEL STAFFORD called HYSHAW on the telephone and instructed, “Alright, go in the uh – the closet real quick.” HYSHAW replied, “I’m here.” DAMIEN ROGER MARCEL STAFFORD stated, “Go in the uh – plastic bag (unintelligible) go in and (unintelligible) that clear Ziplock bag.” HYSHAW asked, “The big one?” DAMIEN ROGER MARCEL STAFFORD responded, “The white one?” HYSHAW answered, “Yeah.” DAMIEN ROGER MARCEL STAFFORD said, “Yeah, take that over there. Dude waiting on you.” HYSHAW asked, “The whole thing?” DAMIEN ROGER MARCEL STAFFORD replied, “Yeah, it should

be just one big bag, right?” HYSHAW answered, “Yeah, well actually it’s two, there’s a big bag in here and a little bag.” DAMIEN ROGER MARCEL STAFFORD responded, “Yeah the little bag ain’t sh-t, take him the big bag.” HYSHAW again replied, “Oh, ok. To that address?” DAMIEN ROGER MARCEL STAFFORD said, “Yep, and he cryin’ like a little bitch.” HYSHAW stated, “I’m on my way now.” Shortly after the call ended, HYSHAW departed her residence at 9xx Valdes Avenue.

ff. On or about September 2, 2021, at approximately 6:02 p.m., DAMIEN ROGER MARCEL STAFFORD received a telephone call from an unidentified female (UF-5) who asked, “Hey, uh, it’s 1033?” DAMIEN ROGER MARCEL STAFFORD answered, “No, 9xx (Valdes Avenue).” UF-5 replied, “Oh, I’m glad I asked.” DAMIEN ROGER MARCEL STAFFORD stated, “Alright, I’m about to tell her to get up, too.” UF-5 asked, “Ok, just go knock on the door?” DAMIEN ROGER MARCEL STAFFORD answered, “Yeah.”

gg. On or about September 2, 2021, at approximately 6:03 p.m., DAMIEN ROGER MARCEL STAFFORD called HYSHAW on the telephone and stated, “Alright, so my homegirl ‘bout to pull up. Go in the bag and get me that white plastic bag and tie it in a knot.” HYSHAW asked, “The big one?” DAMIEN ROGER MARCEL STAFFORD answered, “Yeah. The one that’s like the plastic (unintelligible).” HYSHAW replied, “Yeah, yeah, yeah, ok.” DAMIEN ROGER MARCEL STAFFORD responded, “Alright.”

hh. On or about September 5, 2021, at approximately 7:18 p.m., an unidentified male (UM-7) called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, “I’m calling from (unintelligible).” DAMIEN ROGER MARCEL STAFFORD asked, “You coming from what?” UM-7 responded, “(Unintelligible) to collect the eight windows (eight pounds of methamphetamine).” DAMIEN ROGER MARCEL STAFFORD

answered, "Yeah, I know. I'm saying when are you going to be in Akron?" After further conversation, UM-7 stated, "Ya, ya. He's ready for you (unintelligible) my cousin is going to send you the address (unintelligible)." At approximately 7:24 p.m., UM-7 again called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "I just wanted to make sure you got the address." DAMIEN ROGER MARCEL STAFFORD answered, "I'm getting it right now. I was trying to get it right now." UM-7 replied, "Oh, ok. That's fine. I just wanted to make sure." Approximately two minutes later, DAMIEN ROGER MARCEL STAFFORD sent a text message to UM-7 which read, "9xx Valdes Akron Ohio 44320." At approximately 7:29 p.m., UM-7 again called DAMIEN ROGER MARCEL STAFFORD on the telephone and asked, "Hey bro, did you send me an address?" DAMIEN ROGER MARCEL STAFFORD responded, "That's what you told me to do, right, send you the address?" UM-7 replied, "Ya, but you're going to be local. I can text the address if you want." DAMIEN ROGER MARCEL STAFFORD said, "Yeah, I can't come to you. You're gonna have to come to me. I'm gonna be right here...I don't have a ride to the address you sent. I don't have a ride to Cleveland." UM-7 asked, "(Unintelligible) you don't have car?" DAMIEN ROGER MARCEL STAFFORD responded, "You said I don't have a car?...Yeah, I'm gonna be right here at the address I sent you." UM-7 said, "Oh, ok. I got you, I got you (unintelligible)." DAMIEN ROGER MARCEL STAFFORD stated, "Yeah, I'm here right now waiting on you." UM-7's response was unintelligible. DAMIEN ROGER MARCEL STAFFORD answered, "No, I'm in Akron. I sent you my address. I'm at the address." UM-7 replied, "Ok, let me talk to (unintelligible) and be right there in a couple minutes, ok?" DAMIEN ROGER MARCEL STAFFORD answered, "Ok." UM-7 continued, "(Unintelligible) so maybe he going to take like two hours." DAMIEN

ROGER MARCEL STAFFORD said, "Ok." UM-7 asked, "So you going to be at the address?"

DAMIEN ROGER MARCEL STAFFORD answered, "Yes, sir."

ii. On or about September 5, 2021, at approximately 7:59 p.m., UM-7 again called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "My family wants to know when you're going to go to Los Angeles." DAMIEN ROGER MARCEL STAFFORD asked, "You want to know what?" UM-7 repeated, "When you're going to go to Los Angeles." DAMIEN ROGER MARCEL STAFFORD said, "What I decide with – alright, where you at?" UM-7 answered, "I'm in Mexico." DAMIEN ROGER MARCEL STAFFORD answered, "Ok, ok." UM-7 then said, "My cousin wants to know when you're going to come back or when you can get the windows (pounds of methamphetamine)." DAMIEN ROGER MARCEL STAFFORD replied, "Oh, I thought you was bringing the windows to me." UM-7 responded, "Yeah, she, she, she's thinking about, about to her (unintelligible)." DAMIEN ROGER MARCEL STAFFORD asked, "So she not gon' bring them to me? She can't bring them to me?" UM-7 answered, "Yeah, she needs to, uh, some time because she so find the guy who can get you the things." DAMIEN ROGER MARCEL STAFFORD asked, "So how much time like? Like tomorrow or later tonight? How much time?" UM-7 said, "Uh, you can go, you can go to pick up the things or you have somebody?" DAMIEN ROGER MARCEL STAFFORD asked, "Do I have somebody to go pick that up at that address you sent me?" UM-7 replied, "Yeah, do you have somebody or (unintelligible)?" DAMIEN ROGER MARCEL STAFFORD answered, "Oh, man. Nobody can come to me?" UM-7 said, "Ok, let me, let me talk with my friend...Uh, yeah, that's good. Will you be available this weekend or this week?" DAMIEN ROGER MARCEL STAFFORD answered, "Yes, sir, I am going to be available, but I got to go up there – I'd have to go up there and get that – and go up there and get the windows in Cleveland?...Man, I

think I'm a have to. Can I go tomorrow and pick them up in Cleveland?" UM-7 asked, "Uh, tomorrow?" DAMIEN ROGER MARCEL STAFFORD replied, "Yeah." UM-7 said, "Yeah, you can go and you can go and be up there tomorrow?" DAMIEN ROGER MARCEL STAFFORD answered, "Yes, sir." UM-7 replied, "Ok, ok. So I'm going to call you tomorrow then, ok?" DAMIEN ROGER MARCEL STAFFORD replied, "Ok."

jj. On or about September 6, 2021, at approximately 3:11 p.m., BLACKWELL called DAMIEN ROGER MARCEL STAFFORD on the telephone. During the call, DAMIEN ROGER MARCEL STAFFORD asked, "You in the middle of something?" BLACKWELL replied, "Nah, I was asleep. That's what I was in the middle of." DAMIEN ROGER MARCEL STAFFORD said, "Man, pull up on me real quick, dog." BLACKWELL asked, "Man, where you at? What's wrong?" DAMIEN ROGER MARCEL STAFFORD answered, "Why something gotta be wrong? Why can't something be right?" BLACKWELL replied, "I'm on my way. I'm 'bout to get up, bro. Because I could move a little faster if I knew something was wrong." DAMIEN ROGER MARCEL STAFFORD stated, "Nah, I'm cool. I'm at home, bro. Pull up, bro." BLACKWELL replied, "Alright, man."

kk. On or about September 6, 2021, at approximately 3:29 p.m., UM-7 called DAMIEN ROGER MARCEL STAFFORD on the telephone. During the call, UM-7 stated, "My guy is going to send you that place. Where you at?" DAMIEN ROGER MARCEL STAFFORD answered, "I'm in Akron." UM-7 said, "Ok, ok. He's going to give you that thing the address in Cleveland." DAMIEN ROGER MARCEL STAFFORD replied, "Where I'm going I need it." UM-7 asked, "Ok, where you at right now?" DAMIEN ROGER MARCEL STAFFORD said, "In Akron." UM-7 asked, "Can you go to that address I send you in Cleveland?" DAMIEN ROGER MARCEL STAFFORD responded, "Yeah. I'm about to go to that address you got me."

Can I go there now?" UM-7 asked, "Ok, when can you do it? Today?" DAMIEN ROGER MARCEL STAFFORD replied, "Yeah, today, man. Maybe in like two hours, maybe." UM-7 again asked, "Ok, you can go to today?" DAMIEN ROGER MARCEL STAFFORD said, "Yes, sir." UM-7 stated, "Ok, that's fine. Send us to that address and my guy going to be there, ok? (Unintelligible) and he will call me back so I can make sure." DAMIEN ROGER MARCEL STAFFORD responded, "Alright. So I'll call you in an hour and let you know I'm on my way." UM-7 asked, "Ok, so about what time we going today to be in Cleveland?" DAMIEN ROGER MARCEL STAFFORD answered, "By like 6:00. No later than 7. I'm trying to get it together." UM-7 replied, "Ok, at 6:00 today, ok. Um, so when you close, call me back to make sure, ok? Because my guy is going to be here (unintelligible)." DAMIEN ROGER MARCEL STAFFORD said, "Ok."

ll. On or about September 6, 2021, at approximately 3:40 p.m., BLACKWELL called DAMIEN ROGER MARCEL STAFFORD on the telephone and said, "Hey man, I'm at the door." At approximately 3:46 p.m., DAMIEN ROGER MARCEL STAFFORD called BLACKWELL on the telephone and asked, "Did you close the garage?" BLACKWELL answered, "No, hit it. I can't close it going out. You know that." BLACKWELL then asked, "Hey, how far we got to shoot away?" DAMIEN ROGER MARCEL STAFFORD replied, "Oh, shoot up to Beachwood (unintelligible)."

mm. On or about September 6, 2021, at approximately 4:05 p.m., DAMIEN ROGER MARCEL STAFFORD called RIPLEY on the telephone and asked her, "Hey, you got enough time to – uh, you still at the shop?" RIPLEY replied, "Yeah, I was sitting here when I got a text letting me know something." DAMIEN ROGER MARCEL STAFFORD stated, "No, just go take a shower real quick. You got enough time. Do that. If you could be done with that,

half hour, 45 minutes, that'll be cool." RIPLEY replied, "Oh, that's fine." At approximately 4:51 p.m., RIPLEY called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "I'm just, um, I'm just about to come to you 'cause I'm just leaving (unintelligible)." DAMIEN ROGER MARCEL STAFFORD responded, "Alright, come on."

nn. On or about September 6, 2021, at approximately 5:18 p.m., DAMIEN ROGER MARCEL STAFFORD called BLACKWELL on the telephone and asked, "Where you at?" BLACKWELL answered, "BP (gas station)." DAMIEN ROGER MARCEL STAFFORD stated, "Alright. You ready? About loaded up?" BLACKWELL replied, "Yeah, I'm cool. I got gas, everything. I'm ready." DAMIEN ROGER MARCEL STAFFORD said, "Alright, I'm about to pull in behind you and then just follow her (RIPLEY)." BLACKWELL replied, "Alright... You in this Honda?" DAMIEN ROGER MARCEL STAFFORD answered, "Yeah." DAMIEN ROGER MARCEL STAFFORD, riding as a passenger in a black Honda Accord driven by RIPLEY, then travelled north on I-77, followed by BLACKWELL in a silver Ford Edge.

oo. On or about September 6, 2021, at approximately 5:30 p.m., UM-7 sent DAMIEN ROGER MARCEL STAFFORD a text message which read, "How long does it arrive at the address and what car does it bring?" DAMIEN ROGER MARCEL STAFFORD responded by text message, "Half hour." UM-7 replied, "Ok my people are ready, just tell me what car you in." At approximately 5:54 p.m., DAMIEN ROGER MARCEL STAFFORD answered by text message, "Grey suv," followed by, "6 minutes."

pp. On or about September 6, 2021, at approximately 6:00 p.m., DAMIEN ROGER MARCEL STAFFORD, RIPLEY, and BLACKWELL arrived at a corner store in Cleveland, Ohio. DAMIEN ROGER MARCEL STAFFORD then called UM-7 on the

telephone. UM-7 asked, "You out there?" DAMIEN ROGER MARCEL STAFFORD answered, "Yeah." UM-7 said, "One moment. I am with my people (unintelligible). One moment." At approximately 6:03 p.m., UM-7 sent DAMIEN ROGER MARCEL STAFFORD a text message asking, "Have you seen my people?" Approximately one minute later, PRIETO approached the corner store wearing a backpack. At approximately 6:05 p.m., DAMIEN ROGER MARCEL STAFFORD sent a text message to UM-7 which read, "Yup," followed by another message which read, "Tell him to come back to the suv."

qq. On or about September 6, 2021, at approximately 6:05 p.m., DAMIEN ROGER MARCEL STAFFORD called BLACKWELL on the telephone and asked, "Did that guana done just try to come to your truck?" BLACKWELL answered, "Yeah." DAMIEN ROGER MARCEL STAFFORD said, "That was it." BLACKWELL replied, "Ah, sh-t. Ain't nobody tell me nothing." Approximately one minute later, PRIETO entered the Ford Edge and made contact with BLACKWELL. At approximately 6:08 p.m., BLACKWELL called DAMIEN ROGER MARCEL STAFFORD on the telephone and said, "It's cool." Approximately one minute later, PRIETO exited the Ford Edge carrying the backpack, which appeared to be empty. DAMIEN ROGER MARCEL STAFFORD and RIPLEY then departed in the Honda Accord, followed by BLACKWELL in the Ford Edge.

rr. On or about September 6, 2021, at approximately 6:19 p.m., as the Honda Accord and Ford Edge travelled in tandem towards Akron, BLACKWELL called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "I don't know if they, uh, split it up already (unintelligible). I'll meet you at the house." At approximately 6:38 p.m., DAMIEN ROGER MARCEL STAFFORD called BLACKWELL on the telephone. During the call, BLACKWELL said, "I'm about to look." DAMIEN ROGER MARCEL STAFFORD stated,

“Cause it’s damn near time to get off or do you just wanna follow me?” BLACKWELL answered, “Yeah, hop in front of me.” Both vehicles then exited I-77 south in Akron.

ss. On or about September 6, 2021, at approximately 6:46 p.m., DAMIEN ROGER MARCEL STAFFORD called BLACKWELL and asked, “Did dude leave it in the backpack or he just dump it out?” BLACKWELL replied, “In a black bag, man.” A moment later, BLACKWELL called DAMIEN ROGER MARCEL STAFFORD and asked, “What? Are you about to grab it (the bag containing methamphetamine) up here?” DAMIEN ROGER MARCEL STAFFORD replied, “Yeah around the corner (unintelligible).” A short time later, RIPLEY and DAMIEN ROGER MARCEL STAFFORD travelled to 12xx Weathervane Lane, Akron, Ohio.

tt. On or about September 7, 2021, at approximately 8:01 p.m., DAMIEN ROGER MARCEL STAFFORD called an unidentified male (UM-8) on the telephone and asked, “What’s the deal?” UM-8 answered, “I got my motherf—kin’ son. I just tryin’ to act like nothin’. Tryin’ to keep him for a little somethin’ while I pull up (go to obtain drugs from DAMIEN ROGER MARCEL STAFFORD).” DAMIEN ROGER MARCEL STAFFORD replied, “Man, give me like 6 to 8 minutes, man. I’m gonna come with – I’m gonna send my people and sh-t, man, on their way to work. ‘Cause they about to go to work, so...” UM-8 responded, “Alright. That’s cool.” DAMIEN ROGER MARCEL STAFFORD stated, “Please, please be where you gotta be.” UM-8 asked, “Hey, what you was doing, though?” DAMIEN ROGER MARCEL STAFFORD answered, “I ain’t – I was about to ask you that, too...I don’t know, man. Tell her what you want. What you want?” UM-8 asked, “What they doin’?...I thought they was doin’ 6’s.” DAMIEN ROGER MARCEL STAFFORD replied, “Sh-t. They ate the 6’s up so fast.” UM-8 said, “Oh, they tore those bitches up, huh?” DAMIEN ROGER

MARCEL STAFFORD responded, "Word." UM-8 then asked, "What's the ticket (price) on them then, the folds?" DAMIEN ROGER MARCEL STAFFORD answered, "Sh-t, like 80." UM-8 replied, "80. Alright, just, uh, send, send me, uh, send up – give me, give me 5 of them. I gonna owe you on that (UM-8 will obtain the drugs on consignment). Then I'm gonna grab two of them." DAMIEN ROGER MARCEL STAFFORD said, "Alright." UM-8 then asked, "So I'm just gonna give the money to them or what?"

uu. On or about September 10, 2021, at approximately 12:05 a.m., DAMIEN ROGER MARCEL STAFFORD called VAUGHN on the telephone. During the call, DAMIEN ROGER MARCEL STAFFORD said, "Longface (VAUGHN), give it to him. I got it." VAUGHN replied, "I ain't got it." DAMIEN ROGER MARCEL STAFFORD responded, "I ain't talking about the money. Give 'em what you got to give 'em. Don't worry about it. I got it." VAUGHN stated, "600 (\$600) short." DAMIEN ROGER MARCEL STAFFORD said, "It's cool, Longface. I got it."

vv. On or about September 18, 2021, at approximately 4:19 p.m., DAMIEN ROGER MARCEL STAFFORD called VAUGHN on the telephone. During the call, DAMIEN ROGER MARCEL STAFFORD told VAUGHN, "Hey, give them – give 40 something (an unknown quantity of controlled substance) to Twin (JOHNSTONE) for me when he get there." VAUGHN replied, "Yeah, ok."

ww. On or about September 19, 2021, at approximately 7:01 p.m., an unidentified female (UF-6) called DAMIEN ROGER MARCEL STAFFORD on the telephone from the same phone number that UM-7 used on or about September 5, 2021, and September 6, 2021. During the call, DAMIEN ROGER MARCEL STAFFORD stated, "Tell him my ride

coming now, so maybe...45 minutes.” An unidentified male then got on the phone and told DAMIEN ROGER MARCEL STAFFORD, “Ok, it’s fine.”

xx. On or about September 19, 2021, at approximately 7:27 p.m., DAMIEN ROGER MARCEL STAFFORD called Lachelle Jackson, named but not indicted herein, on the telephone. DAMIEN ROGER MARCEL STAFFORD asked, “Alright, are you ready?” Jackson replied, “Are you ready?” DAMIEN ROGER MARCEL STAFFORD said, “I’m about to come get you.”

yy. On or about September 19, 2021, at approximately 8:07 p.m., UM-7 called DAMIEN ROGER MARCEL STAFFORD on the telephone. DAMIEN ROGER MARCEL STAFFORD said, “It says 31 minutes. GPS 31 minutes.” UM-7 responded, “Oh, ok.” At approximately 8:36 p.m., DAMIEN ROGER MARCEL STAFFORD arrived in the Tremont neighborhood of Cleveland, Ohio.

zz. On or about September 20, 2021, at approximately 4:39 p.m., DAMIEN ROGER MARCEL STAFFORD received a phone call from UM-7. DAMIEN ROGER MARCEL STAFFORD asked, “Do I go to the new address?” UM-7 replied, “You already there?” DAMIEN ROGER MARCEL STAFFORD answered, “I’m on the E way (I-77). I’m going to the address you sent me. Marvin (Marvin Avenue, Cleveland, Ohio)?” UM-7 responded, “The address is going to change. Just give me a second...It’s, ah, 4153 Trowbridge Avenue.” DAMIEN ROGER MARCEL STAFFORD asked, “That’s where I’m going? I’m on my way.” UM-7 inquired, “How long will it take?” DAMIEN ROGER MARCEL STAFFORD answered, “38 minutes.”

aaa. On or about September 20, 2021, at approximately 4:49 p.m., DAMIEN ROGER MARCEL STAFFORD called Kevin Holmes, named but not indicted herein, on the

telephone and asked, “Your lights and blinkers and all that sh-t good?” Holmes replied, “Yeah. Hell yeah.” DAMIEN ROGER MARCEL STAFFORD said, “Alright.” At approximately 5:44 p.m., DAMIEN ROGER MARCEL STAFFORD again called Holmes on the telephone and asked, “Which way you going?” Holmes answered, “Sh-t, my GPS 20 miles on this road.” DAMIEN ROGER MARCEL STAFFORD instructed, “Turn left right here. Follow me for a minute.” Holmes responded, “Ok. I was like, damn this sh-t crazy.” DAMIEN ROGER MARCEL STAFFORD replied, “That’s why team work make the dream work.” At approximately 5:32 p.m., DAMIEN ROGER MARCEL STAFFORD arrived in the Tremont neighborhood of Cleveland, Ohio. A few minutes later, DAMIEN ROGER MARCEL STAFFORD left Cleveland and travelled south on I-77 toward Akron, Ohio. At approximately 5:47 p.m., DAMIEN ROGER MARCEL STAFFORD called Holmes on the telephone and said, “Turn your blinker off.” Holmes responded, “Oh, ok.” At approximately 6:07 p.m., DAMIEN ROGER MARCEL STAFFORD called Holmes on the telephone and instructed, “Get off on Copley (Road) and go on Valdes (Avenue)...It’s like the second street. Right there before you get to the liquor store.”

bbb. On or about September 20, 2021, at approximately 6:08 p.m., DAMIEN ROGER MARCEL STAFFORD called HYSHAW on the telephone and asked, “What’s up with it?” HYSHAW replied, “Nothing. I’m home cooking.” DAMIEN ROGER MARCEL STAFFORD said, “I’m about to pull up.” HYSHAW answered, “Ok.”

ccc. On or about September 20, 2021, at approximately 6:15 p.m., DAMIEN ROGER MARCEL STAFFORD called Kevin Holmes on the telephone and stated, “Yeah, I’m going to coach you in....Right here. Back into here, this first driveway right here to your right.” Holmes then backed his vehicle into the driveway at 9xx Valdes Avenue. At approximately 6:20

p.m., DAMIEN ROGER MARCEL STAFFORD called Holmes on the telephone and instructed him, "Just grab it and come in the side door." Holmes responded, "Alright."

ddd. On or about September 20, 2021, at approximately 6:30 p.m., TUCKER called DAMIEN ROGER MARCEL STAFFORD on the telephone. During the call, TUCKER asked, "Are you where you normally are?" DAMIEN ROGER MARCEL STAFFORD replied, "No. The second place." TUCKER asked, "The original?" DAMIEN ROGER MARCEL STAFFORD responded, "No. Off Copley by the liquor store. My sister's house." TUCKER said, "Oh, ok. I'll let you know when I pull up. I'm on my way." At approximately 6:49 p.m., TUCKER arrived at 9xx Valdes Avenue in a silver Infinity SUV. At approximately 6:59 p.m., DAMIEN ROGER MARCEL STAFFORD called TUCKER on the telephone and instructed her, "Come to the side door." TUCKER replied, "Ok."

eee. On or about September 21, 2021, at approximately 12:20 a.m., DAMIEN ROGER MARCEL STAFFORD called Kevin Holmes on the telephone and asked, "How far can you go?" Holmes answered, "Um, I mean, not that far. I mean, probably in the area." DAMIEN ROGER MARCEL STAFFORD replied, "That's it? That's the only thing comfortable?" Holmes answered, "Yeah, I mean, yeah 'cause I got mine, yeah. Why? What's up? It all depends." DAMIEN ROGER MARCEL STAFFORD said, "Um, shoot. They want to see us in the Carolina tomorrow." Holmes replied, "Oh, yeah. That too far." Later in the call DAMIEN ROGER MARCEL STAFFORD stated, "Check with motherf—kers if you can tonight. Make the call to see who gonna be available to run around tomorrow if they can. I'll make it right."

fff. On or about September 21, 2021, at approximately 2:39 p.m., HYSHAW called DAMIEN ROGER MARCEL STAFFORD on the telephone and said, "Before I went and

got Pree. And I know you're on a time limit 'cause the post office close at five. And by the time I go get her and come back, I ain't gonna really have time to do nothing else. So do the money – can the MoneyGram thing wait so I can focus on this?" DAMIEN ROGER MARCEL STAFFORD'S response was unintelligible. HYSHAW replied, "Yeah, ok. Then I'm about to go the store and get (unintelligible) some. Then when I come back, what am I doing? Just putting it in there and that's it?" DAMIEN ROGER MARCEL STAFFORD answered, "Like, uh, fill it out where it's going. Make up an address." At approximately 3:17 p.m., HYSHAW called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "Hello, yeah. I'm at the home. I ain't see nothing. I went to two stores looking for something with a lid, and I think with the envelope and the box and if I wrap it up with something." DAMIEN ROGER MARCEL STAFFORD responded, "Ok, so this is the thing. Let me explain it to you so you understand. It will make more sense. Ok. They got a pin. Like they can't just open your sh-t and tear your sh-t up. You know what I'm saying? They got a long needle they will stick in your sh-t. They can poke a hole through some sh-t." HYSHAW said, "Right, so if it's in something..." DAMIEN ROGER MARCEL STAFFORD responded, "They can smell it." HYSHAW replied, "Oh. Ok, ok." DAMIEN ROGER MARCEL STAFFORD continued, "When they hit resistance, they gotta stop." HYSHAW answered, "Right, so you need something with a lid." DAMIEN ROGER MARCEL STAFFORD said, "It could be a big ass toy. Anything." HYSHAW said, "Anything. It just gotta fit inside of there." DAMIEN ROGER MARCEL STAFFORD stated, "It gotta fit inside something solid, you know what I mean?" HYSHAW replied, "Right, and then inside the box. So do the envelope matter?" DAMIEN ROGER MARCEL STAFFORD answered, "The envelope ain't sh-t. That's why I'm was like, it ain't really nothing." HYSHAW responded, "Oh, ok. See, I was trying to make sure

it went in both. But the object is so that the pin can't get through. I got it. I'm gonna have time to do that. So then all you guys want me to do is put that in there and fill out the label?"

DAMIEN ROGER MARCEL STAFFORD answered, "Yup. And I'm gonna have somebody come get it and take it."

ggg. On or about September 21, 2021, at approximately 3:05 p.m., Lachelle Jackson called DAMIEN ROGER MARCEL STAFFORD on the telephone and said, "It's ready at 3:30, so, um, you gonna be around?" DAMIEN ROGER MARCEL STAFFORD replied, "I'm around." Jackson responded, "Ok, I'm on Romig Road." DAMIEN ROGER MARCEL STAFFORD asked, "Where you gotta go? Same place down there?" Jackson answered, "By St. V (St. Vincent – St. Mary High School)."

hhh. On or about September 21, 2021, at approximately 3:50 p.m., Lachelle Jackson called DAMIEN ROGER MARCEL STAFFORD on the telephone. Jackson said, "So it's going to be four people. Let me see. A van or car?" DAMIEN ROGER MARCEL STAFFORD replied, "A van." Jackson stated, "Alright, it's going to be \$17.00 more a day, but alright." DAMIEN ROGER MARCEL STAFFORD responded, "Well get a car then. I don't know. You talking about more. I don't have any more f—king money." Jackson then asked, "So you want a car? It's either an Altima or a van." DAMIEN ROGER MARCEL STAFFORD replied, "A van." Jackson said, "Right. That's why I'm asking. The Altima small." DAMIEN ROGER MARCEL STAFFORD responded, "Definitely." Jackson said, "I can do the van...It's, uh, Arizona (license plates on the rental vehicle)." DAMIEN ROGER MARCEL STAFFORD replied, "It is what it is. Sh-t, everything multiple states at this point."

iii. On or about September 21, 2021, Lachelle Jackson rented a blue 2020 Chrysler Voyager bearing Arizona plate AYN0268 from the Enterprise Rental Car location on

Market Street in Akron, located approximately one quarter mile from St. Vincent – St. Mary High School. Jackson rented the vehicle from September 21, 2021 and scheduled it for return on September 23, 2021.

jjj. On or about September 21, 2021, at approximately 6:08 p.m., DAMIEN ROGER MARCEL STAFFORD called FLOYD on the telephone. FLOYD stated, “I’m at the spot, bro.” DAMIEN ROGER MARCEL STAFFORD replied, “Alright. I got two cars here. I can’t drive them both, so, uh, try to get as many people. I mean, who all going with us and sh-t? Like how we gonna do that to your spot and then I’ll make the adjustments.” FLOYD answered, “Alright.” DAMIEN ROGER MARCEL STAFFORD said, “Alright, ‘cause I’m still like waiting for two people to pull up, so I can’t just pull out. But I’m ready, though, other than that, though.” At approximately 7:42 p.m., FLOYD called DAMIEN ROGER MARCEL STAFFORD on the telephone. DAMIEN ROGER MARCEL STAFFORD said, “I was wondering if I had enough time to run to Walmart real quick.” FLOYD replied, “Uh, yeah. Hurry up. What time is it?” DAMIEN ROGER MARCEL STAFFORD responded, “There ain’t no hurry. I’m sayin’, I, uh, my flight don’t leave ‘til six in the morning....So, for real, I ain’t sayin’ we can be loose, but we can be a little loose. You know what I’m sayin’? As long as motherf—kers get out of here by tonight, we can get in in the morning, get a little hotel, and get some sleep for real. You know what I’m sayin’?” FLOYD answered, “Yep.” DAMIEN ROGER MARCEL STAFFORD said, “Uh, then we can get some sleep, we can make a couple runs.”

kkk. On or about September 21, 2021, FLOYD, CLIFFORD E. STAFFORD, and others unknown to the grand jury left Akron, Ohio, and travelled to Charlotte, North Carolina, in the blue 2020 Chrysler Voyager and another rental vehicle.

iii. On or about September 22, 2021, at approximately 7:06 a.m., DAMIEN ROGER MARCEL STAFFORD called Lachelle Jackson on the telephone from Cleveland Hopkins International Airport. DAMIEN ROGER MARCEL STAFFORD stated, "I need you to, uh, take five (\$5,000) to the bank or whatever...Send it to my dude in New York." Jackson agreed to do so.

mmm. On or about September 22, 2021, at approximately 7:38 a.m., DAMIEN ROGER MARCEL STAFFORD spoke by telephone to CLIFFORD E. STAFFORD. DAMIEN ROGER MARCEL STAFFORD asked, "Y'all make it in yet?" CLIFFORD E. STAFFORD answered, "Yo, yeah." DAMIEN ROGER MARCEL STAFFORD said, "My flight land at 10:00, man. Come get me." CLIFFORD E. STAFFORD replied, "Alright." DAMIEN ROGER MARCEL STAFFORD stated, "I'm just waiting at the airport now. I missed my first flight, so..."

nnn. On or about September 22, 2021, FLOYD checked into three hotel rooms in his name at the Sleep Inn Airport hotel located at 701 Yorkmount Road, Charlotte, North Carolina.

ooo. On or about September 22, 2021, at approximately 9:38 a.m., DAMIEN ROGER MARCEL STAFFORD called CLIFFORD E. STAFFORD on the telephone from the Charlotte International Airport in Charlotte, North Carolina, and asked, "Where you at?" CLIFFORD E. STAFFORD replied, "Around the corner...It's called the Sleep Inn." DAMIEN ROGER MARCEL STAFFORD said, "Alright, I'll call you when I get out of here. Man, I'm still on the plane. I just landed." At approximately 10:08 a.m., DAMIEN ROGER MARCEL STAFFORD called CLIFFORD E. STAFFORD on the telephone. CLIFFORD E. STAFFORD said, "I'm at Arrivals." DAMIEN ROGER MARCEL STAFFORD replied, "Arrival #3."

ppp. On or about September 22, 2021, at approximately 10:14 a.m., an unidentified male (UM-9) called DAMIEN ROGER MARCEL STAFFORD on the telephone. DAMIEN ROGER MARCEL STAFFORD said, "20 minutes. Heading to my car...I'm going to call you in twenty minutes when my car get here." UM-9 replied, "When your car get there? Alright." At approximately, 10:48 a.m., DAMIEN ROGER MARCEL STAFFORD called UM-9 and asked, "Where? What we doin'?" UM-9 answered, "You're going to come out the airport and get on (Interstate) 526 like you're going towards the Mount Pleasant way, and then you're going to get off that exit." DAMIEN ROGER MARCEL STAFFORD replied, "I went around to this hotel real quick to get my sh-t together...so I'm like 10 minutes from the airport." UM-9 said, "Alright, alright. So, um, you going to send me the location where you are at and then you come to the spot." At approximately 10:50 a.m., DAMIEN ROGER MARCEL STAFFORD sent a text message to UM-9 which read, "I'm at 701 Yorkmont rd." At approximately 11:01 a.m., UM-9 called DAMIEN ROGER MARCEL STAFFORD on the telephone and asked, "Yo, you in Charleston, right?" DAMIEN ROGER MARCEL STAFFORD replied, "No, I'm in Charlotte." UM-9 responded, "You in Charlotte?" DAMIEN ROGER MARCEL STAFFORD said, "Yeah." UM-9 said, "That's all the way in North Carolina, man." DAMIEN ROGER MARCEL STAFFORD asked, "That's where I'm supposed to be, ain't I?" UM-9 replied, "No, you supposed to be in Charleston, South Carolina... Yeah, man, you like four or five hours away from me, G." DAMIEN ROGER MARCEL STAFFORD responded, "I don't know what to do. Oh, my God." UM-9 asked, "They gave you that address? They told you to go to Charlotte?" DAMIEN ROGER MARCEL STAFFORD said, "That's what they told me." UM-9 replied, "No, man. They were supposed to tell you to go to Charleston. Unless you didn't understood right. It's supposed to be Charleston." At approximately 11:13 a.m., DAMIEN ROGER

MARCEL STAFFORD called UM-9 on the telephone and said, "Yeah, man. Big misunderstanding." UM-9 replied, "I put the location where you at, man. You three hours away, man, if you want to head this way." DAMIEN ROGER MARCEL STAFFORD said, "Alright. Let me put my team together, man. I'm going to call you back."

qqq. On or about September 22, 2021, at approximately 11:45 a.m., DAMIEN ROGER MARCEL STAFFORD called UM-9 and said, "Send me the address." Three minutes later, UM-9 sent DAMIEN ROGER MARCEL STAFFORD a text message which read, "2XX Columbia Drive LADSON SC 29456." UM-9 then called DAMIEN ROGER MARCEL STAFFORD on the telephone and said, "Yo, that address I sent you – make sure that when you pull it up it says Charleston, I mean Charleston, South Carolina, or Ladson, South Carolina. One of the two." DAMIEN ROGER MARCEL STAFFORD replied, "Ok...Let me see. I'm about to look it up. Give me one second." UM-9 asked, "You good?" DAMIEN ROGER MARCEL STAFFORD said, "Yep." UM-9 responded, "Alright. See you in a little bit."

rrr. On or about September 22, 2021, FLOYD, CLIFFORD E. STAFFORD, and others unknown to the grand jury left Charlotte, North Carolina, and travelled to Ladson, South Carolina, in the blue 2020 Chrysler Voyager and another rental car.

sss. On or about September 22, 2021, at approximately 12:40 p.m., Lachelle Jackson called DAMIEN ROGER MARCEL STAFFORD on the telephone. During the call, DAMIEN ROGER MARCEL STAFFORD asked, "Did you send that money?" Jackson replied, "No...I was gonna do it after I leave here, too. It's with me."

ttt. On or about September 22, 2021, at approximately 2:55 p.m., DAMIEN ROGER MARCEL STAFFORD called UM-9 on the telephone and said, "I'm like 20 minutes out." UM-9 replied, "Alright...When you come in, go through the back." At approximately

3:20 p.m., DAMIEN ROGER MARCEL STAFFORD sent a text message to UM-9 which read, "Bro u sent me to the wrong house." At approximately 3:22 p.m., UM-9 called DAMIEN ROGER MARCEL STAFFORD on the telephone and asked, "Yo, that was you that passed by in the blue van?" DAMIEN ROGER MARCEL STAFFORD answered, "Yeah." UM-9 said, "Alright. My bad, man. I was fu—in' making me a burger. But, um, you gotta back up. It's where the black Pathfinder's at." DAMIEN ROGER MARCEL STAFFORD replied, "Alright." At approximately 3:25 p.m., UM-9 called DAMIEN ROGER MARCEL STAFFORD on the telephone and asked, "You turned around?" DAMIEN ROGER MARCEL STAFFORD answered, "I'm not there. It's my brother and them. You know what I'm saying? I had to stay in Charlotte. I'm trying to go from your phone call to his phone call." UM-9 inquired, "He's calling me from a Tennessee number?" DAMIEN ROGER MARCEL STAFFORD said, "Nah, he's not calling you. I'm about to give you the number, though." UM-9 responded, "If anything, tell him to turn around. He passed the house." DAMIEN ROGER MARCEL STAFFORD answered, "I'm about to give him your number."

uuu. On or about September 22, 2021, at approximately 5:00 p.m., DAMIEN ROGER MARCEL STAFFORD called CLIFFORD E. STAFFORD on the telephone. DAMIEN ROGER MARCEL STAFFORD said, "(Unintelligible) pulling up in a blue Tundra pickup truck." CLIFFORD E. STAFFORD replied, "Tundra? Ok. I don't see them out there yet. I don't see one out there yet. This sh-t wild."

vvv. On or about September 22, 2021, at approximately 7:44 p.m., DAMIEN ROGER MARCEL STAFFORD called CLIFFORD E. STAFFORD on the telephone. CLIFFORD E. STAFFORD said, "It's a rain storm. Can't see. Wipers raggedy... We on our way."

www. On or about September 23, 2021, at approximately 6:07 a.m., the blue 2020 Chrysler Voyager bearing Arizona plate AYN0268 arrived at DAMIEN ROGER MARCEL STAFFORD'S residence at 4xx White Pond Drive, Akron, Ohio.

xxx. On or about September 23, 2021, at approximately 6:15 a.m., CLIFFORD E. STAFFORD departed DAMIEN ROGER MARCEL STAFFORD'S residence at 4xx White Pond Drive in the blue 2020 Chrysler Voyager and travelled to 11xx Hardesty Boulevard, Akron, Ohio. The Voyager backed into the driveway at 11xx Hardesty Boulevard.

yyy. On or about September 23, 2021, at approximately 7:18 a.m., HYSHAW arrived at DAMIEN ROGER MARCEL STAFFORD'S residence at 4xx White Pond Drive. Shortly thereafter, HYSHAW travelled to her residence at 9xx Valdes Avenue, then to 11xx Hardesty Boulevard, where HYSHAW entered the residence carrying a bookbag.

zzz. On or about September 23, 2021, at approximately 8:58 a.m., HYSHAW arrived at 12xx Weathervane Lane, Akron, Ohio, and parked in the parking lot in front of the building. DAMIEN ROGER MARCEL STAFFORD was also present in the parking lot. HYSHAW and DAMIEN ROGER MARCEL STAFFORD entered 12xx Weathervane Lane together, DAMIEN ROGER MARCEL STAFFORD carrying a brown Gucci bag and HYSHAW carrying a black backpack. At approximately 9:07 a.m., HYSHAW left 12xx Weathervane Lane without the black backpack.

aaaa. On or about September 23, 2021, at approximately 10:30 a.m., TUCKER arrived at 12xx Weathervane Lane. Upon her arrival, TUCKER called DAMIEN ROGER MARCEL STAFFORD on the telephone and stated, "I'm up to the door now." DAMIEN ROGER MARCEL STAFFORD replied, "Alright." TUCKER then entered 12xx Weathervane Lane. Approximately one minute later, TUCKER exited 12xx Weathervane Lane wearing a

black backpack and departed in a silver Infinity SUV. At approximately 10:41 a.m., TUCKER entered the Merriman Valley Self Storage facility at 1640 Akron Peninsula Road, Akron, Ohio. At approximately 10:47 a.m., TUCKER departed from the storage facility.

bbbb. On or about September 23, 2021, at 12xx Weathervane Lane, Apartment 2B, Akron, Ohio, DAMIEN ROGER MARCEL STAFFORD and RIPLEY possessed approximately 1,963.61 grams of fentanyl, a blender containing white powder, a drug press, digital scales, plastic baggies with powder residue. DAMIEN ROGER MARCEL STAFFORD attempted to flush additional fentanyl down the toilet.

cccc. On or about September 23, 2021, at 9xx Valdes Avenue, Akron, Ohio, HYSHAW possessed approximately 181.67 grams of fentanyl, 56.1 grams of a mixture and substance containing a detectable amount of methamphetamine, digital scales with powder residue, and an FN 5.7 x 28mm caliber semiautomatic pistol, bearing serial number 386369903.

dddd. On or about September 23, 2021, at 11xx Hardesty Boulevard, Akron, Ohio, VAUGHN possessed approximately 379.56 grams of cocaine; 14.67 grams of fentanyl; an Arsenal, Inc. 7.62 caliber semiautomatic rifle, bearing serial number AB050267; a Taurus 9mm semiautomatic pistol, bearing serial number TMA10747, with an extended magazine; an FN 5.7 x 28mm caliber semiautomatic pistol, bearing serial number 386390266, ammunition, and plastic baggies with powder residue.

eeee. On or about September 23, 2021, at 4xx White Pond Drive, #1, Akron, Ohio, DAMIEN ROGER MARCEL STAFFORD possessed a Glock model 27 Gen 5 .40 caliber semiautomatic pistol, bearing serial number BUGB459, a Glock magazine loaded with .40 caliber ammunition, \$10,390 in U.S. currency, a money counter, a digital scale with powder residue, and plastic baggies with powder residue.

ffff. On or about September 23, 2021, TUCKER stored approximately 11,911.66 grams of fentanyl, approximately 1,003.14 grams of valeryl fentanyl, and approximately 4,581 pills containing fentanyl with a total weight of 502.33 grams at Merriman Valley Self Storage, Storage Locker 106, 1640 Akron Peninsula Road, Akron, Ohio.

gggg. On or about September 30, 2021, at 800 Dawson Road, Akron, Ohio, STEWART possessed approximately 101 tablets containing methamphetamine with a total weight of approximately 35.44 grams.

All in violation of in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

6. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendants DAMIEN ROGER MARCEL STAFFORD and MARIAN RIPLEY did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

7. Before Defendant DAMIEN ROGER MARCEL STAFFORD committed the offense charged in this count, the defendant had a final conviction for a serious violent felony, namely, a conviction under Ohio Revised Code section 2911.01(A)(1), Aggravated Robbery, for which he served more than 12 months imprisonment, in case number 2007-08-2834, in the Court of Common Pleas of Summit County, Ohio, on or about February 28, 2008.

COUNT 3

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

8. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RAUSHEEDA L. HYSHAW did knowingly and intentionally possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 4

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

9. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RAUSHEEDA L. HYSHAW did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 5

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

10. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RICKY LYNN VAUGHN did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

11. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RICKY LYNN VAUGHN did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

(Felon in Possession of Firearms, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

12. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RICKY LYNN VAUGHN, knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Aggravated Trafficking in Drugs, on or about July 25, 1995, in case number 1995-04-1084-B, in the Court of Common Pleas of Summit County, Ohio, knowingly possessed in and affecting interstate and foreign commerce firearms, to wit: an Arsenal, Inc. 7.62 caliber semiautomatic rifle, bearing serial number AB050267; a Taurus 9mm semiautomatic pistol, bearing serial number TMA10747; and an FN 5.7 x 28mm caliber semiautomatic pistol, bearing serial number 386390266, and ammunition, said firearms and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 8

(Possession of a Firearm in Furtherance of a Drug Trafficking Offense,
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

13. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RICKY LYNN VAUGHN did knowingly possess firearms, specifically an Arsenal, Inc. 7.62 caliber semiautomatic rifle, bearing serial number AB050267; a Taurus 9mm semiautomatic pistol, bearing serial number TMA10747; and an FN 5.7 x 28mm caliber semiautomatic pistol, bearing serial number 386390266, and ammunition, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, those being, Possession with Intent to Distribute a Controlled Substance, as charged in Counts 5 and 6 herein, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 9

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

14. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant DAMIEN ROGER MARCEL STAFFORD, knowing he had been previously convicted of crimes punishable by imprisonment for terms exceeding one year, those being: Felonious Assault, on or about December 11, 2001, in case number 2001-06-1487-C, in the Court of Common Pleas of Summit County, Ohio; Aggravated Assault, on or about December 13, 2001, in case number 2001-09-2309, in the Court of Common Pleas of Summit County, Ohio; Aggravated Robbery, on or about February 28, 2008, in case number 2007-08-2834, in the Court of Common Pleas of Summit County, Ohio; Trafficking Cocaine, on or about January 15, 2019, in case number 2017-05-1678, in the Court of Common Pleas of Summit County, Ohio; and Aggravated Trafficking in Drugs, on or about January 15, 2019, in case

number 2017-05-1894, in the Court of Common Pleas of Summit County, Ohio, knowingly possessed in and affecting interstate and foreign commerce a firearm, to wit: a Glock model 27 Gen 5 .40 caliber semiautomatic pistol, bearing serial number BUGB459, and ammunition, said firearm and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 10

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

15. On or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant DORSHAUN TUCKER did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 11

(Maintaining a Drug-Involved Premises, 21 U.S.C. § 856(a)(2))

The Grand Jury further charges:

16. From on or about August 17, 2021, and continuing through at least on or about September 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RAUSHEEDA L. HYSHAW, did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee and agent, namely 9xx Valdes Avenue, Akron, Ohio, 44320, and did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation 9xx Valdes Avenue, Akron, Ohio 44302, for the purpose of unlawfully manufacturing, storing, distributing and using controlled substances, namely

methamphetamine, cocaine, and fentanyl, Schedule II controlled substances, in violation of Title 21, United States Code, Section 856(a)(2).

COUNTS 12-18

(Use of a Communication Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

17. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1):

Counts	Defendants	Date	Time (EST)
12	DAMIEN ROGER MARCELL STAFFORD	September 2, 2021	2:46 p.m.
13	CRAIG L. JOHNSTONE	July 13, 2021	5:22 p.m.
14	TRAVIS BLANKENSHIP	July 13, 2021	4:27 p.m.
15	JESSICA MCCLANAHAN	July 13, 2021	11:49 a.m.
16	DORSHAUN TUCKER	September 23, 2021	10:30 a.m.
17	LUCIAN D. BLACKWELL	September 6, 2021	6:08 p.m.
18	ANTWAIN D. STEWART	May 11, 2021	7:46 a.m.

FORFEITURE

The Grand Jury further charges:

18. The allegations contained in Counts 1-18 of this Superseding Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853 (drug offenses) and Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code,

Section 2461(c) (firearms offenses). As a result of these offenses, Defendants DAMIEN ROGER MARCEL STAFFORD, RAUSHEEDA L. HYSHAW, RICKY LYNN VAUGHN, CRAIG L. JOHNSTONE, CHEZERA E. FLOYD, TRAVIS BLANKENSHIP, JESSICA MCCLANAHAN, CLIFFORD E. STAFFORD, DORSHAUN R. TUCKER, LUCIAN D. BLACKWELL, MARIAN RIPLEY, ALEXANDER PRIETO, and ANTWAIN D. STEWART shall forfeit to the United States: (i) any all property constituting, or derived from, any proceeds the Defendants obtained, directly or indirectly, as the result of the drug offenses; (ii) any and all of the Defendants' property used - or intended to be used - in any manner or part, to commit or to facilitate the commission of the drug offenses; and, (iii) any and all firearms and ammunition involved in or used in the commission of the firearms offenses; including, but not limited to, the following:

a. Arsenal, Inc. 7.62 caliber semiautomatic rifle, bearing serial number: AB050267, with any ammunition, seized on September 23, 2021, at a location in Akron, Ohio, where RICKY LYNN VAUGHAN had been staying.

b. Taurus 9mm semiautomatic pistol, bearing serial number: TMA10747, with any ammunition, seized on September 23, 2021, at a location in Akron, Ohio, where RICKY LYNN VAUGHAN had been staying.

c. FN 5.7 x 28mm caliber semiautomatic pistol, bearing serial number: 386390266, with any ammunition, seized on September 23, 2021, at a location in Akron, Ohio, where RICKY LYNN VAUGHAN had been staying.

d. FN 5.7 x 28mm caliber semiautomatic pistol, bearing serial number: 386369903, with any ammunition, seized on September 23, 2021, at the Akron, Ohio, residence of RAUSHEEDA L. HYSHAW.

e. \$10,390.00 U.S. Currency seized on September 23, 2021, at the Akron, Ohio, residence of DAMIEN ROGER MARCEL STAFFORD.

f. Glock model 27 Gen 5 .40 caliber semiautomatic pistol, bearing serial number: BUGB459, with Glock magazine loaded with .40 caliber ammunition, seized on September 23, 2021, at the Akron, Ohio, residence of DAMIEN ROGER MARCEL STAFFORD.

g. Diamond earring seized from the person of DAMIEN ROGER MARCEL STAFFORD on September 23, 2021.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.