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CLERK OF DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

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

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

ALLEN GRAVES,  
aka ALAN,  
aka UNC,  
aka RUDY,  
MARTEZ MONTGOMERY,  
aka T,  
aka TEZ,  
TERRANCE LOMBARD,  
aka T,  
EDWARD HEARN,  
aka CHARDY ROSET,  
DARRYL MCFADDEN,  
aka HOMIE,  
JERONNE WHITE,  
aka B,  
aka BURGER,  
CHRISTOPHER PRINCE,  
DANNI CHILDERS,  
DECARLOS BATES,  
aka LOS,  
aka RED,  
DEVONTA ADAMS,  
aka TAY,

INDICTMENT

3:14CR067

CASE NO.

Title 21, Section 846, United States Code  
Title 21, Sections 841(a)(1), (b)(1)(A), (b)(1)(C) and (b)(1)(E), United States Code  
Title 21, Section 843(b), United States Code  
Title 21, Section 856(a)(2), United States Code  
Title 18, Section 1952(a)(3), United States Code

JUDGE ZOUHARY

JASON GRAVES, )  
 aka JA-BO, )  
 MARNIECE LOVE, )  
 BRITTANY PAYNE, )  
 MARCUS BENSON, )  
 GREG BURKETT, )  
 DARRELL JACOBS, )  
 aka TODD, )  
 DANIELLE SULLIVAN, )  
 STEVEN LESTER, )  
 ABBEE HEINE, )  
 )  
 Defendants. )

COUNT 1

The Grand Jury charges:

Beginning at least as early as January of 2012, and continuing through December of 2013, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Western Division, and elsewhere, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY; MARTEZ MONTGOMERY, aka T, aka TEZ; TERRANCE LOMBARD, aka T; EDWARD HEARN, aka CHARDY ROSET; DARRYL MCFADDEN, aka HOMIE; JERONNE WHITE, aka B, aka BURGER; CHRISTOPHER PRINCE; DANNI CHILDERS; DECARLOS BATES, aka LOS, aka RED; DEVONTA ADAMS, aka TAY; JASON GRAVES, aka JA-BO; MARNIECE LOVE; BRITTANY PAYNE; MARCUS BENSON; GREG BURKETT; DARRELL JACOBS, aka TODD; DANIELLE SULLIVAN; STEVEN LESTER; and ABBEE HEINE, the defendants herein, and others known and unknown did unlawfully, 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 and to distribute at least one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; to possess with the intent to distribute and to distribute at least 280 grams or more of a mixture or substance containing a detectable amount of cocaine base

("crack"), a Schedule II controlled substance; to possess with the intent to distribute Oxycodone (Percocet) pills, a Schedule II controlled substance; to possess with the intent to distribute Methylphenidate (Ritalin) pills, a Schedule II controlled substance; to possess with the intent to distribute Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and to possess with the intent to distribute Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(C) and (b)(1)(E).

MANNER AND MEANS OF THE CONSPIRACY

A. It was part of the conspiracy that MARTEZ MONTGOMERY and ALLEN GRAVES obtained amounts of heroin, cocaine base ("crack"), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax) from TERRANCE LOMBARD, EDWARD HEARN, MARCUS BENSON, DARRYL MCFADDEN, L.T., Jr. (a person known to the grand jury, but not indicted herein), an unknown male, aka Meech, and various other suppliers in Detroit, Michigan, Fort Wayne, Indiana, and elsewhere.

B. It was further part of the conspiracy that MARTEZ MONTGOMERY and ALLEN GRAVES recruited family members and other friends from the Detroit, Michigan area to travel to Marion, Ohio, to distribute heroin, cocaine base ("crack"), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax).

C. It was further part of the conspiracy that MARTEZ MONTGOMERY and ALLEN GRAVES, with the assistance of ABBEE HEINE, rented houses in ABBEE HEINE's name located at 438 1/2 North Prospect Street, Marion, Ohio, and 323 Mound Street, Marion, Ohio, for the purpose of distributing heroin, cocaine base (crack), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax).

D. It was further part of the conspiracy that DANNI CHILDERS rented the house at 238 Park Boulevard, Marion, Ohio, in her name, for the purpose of distributing heroin, cocaine base (“crack”), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax).

E. It was further part of the conspiracy that STEVEN LESTER allowed ALLEN GRAVES and MARTEZ MONTGOMERY to register their vehicles in LESTER’s name to avoid suspicion of law enforcement. It was further part of the conspiracy that LESTER routinely drove ALLEN GRAVES from Marion, Ohio to Detroit, Michigan, and back, to transport drugs and drug proceeds.

F. It was further part of the conspiracy that CHRISTOPHER PRINCE, JERONNE WHITE, DECARLOS BATES, DEVONTA ADAMS, JASON GRAVES, MARNIECE LOVE, Juvenile #1 (a person known to the grand jury, but not indicted herein), and others shared and used a “community telephone,” number (419) 617-5095, which they all used to communicate with drug customers and suppliers.

G. It was further part of the conspiracy that CHRISTOPHER PRINCE, JERONNE WHITE, DECARLOS BATES, DEVONTA ADAMS, JASON GRAVES, MARNIECE LOVE, Juvenile #1, STEVEN LESTER, and others shared and used the residences rented by ALLEN GRAVES, MARTEZ MONTGOMERY, ABBEE HEINE, and DANNI CHILDERS for the purpose of storing and distributing heroin, cocaine base (“crack”), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax).

H. It was further part of the conspiracy that ALLEN GRAVES, MARTEZ MONTGOMERY, TERRANCE LOMBARD, EDWARD HEARN, DARRYL MCFADDEN, JERONNE WHITE, CHRISTOPHER PRINCE, DANNI CHILDERS, DECARLOS BATES,

DEVONTA ADAMS, JASON GRAVES, MARNIECE LOVE, BRITTANY PAYNE, MARCUS BENSON, GREG BURKETT, DARRELL JACOBS, DANIELLE SULLIVAN, STEVEN LESTER, ABBEE HEINE, and others used code words such as; “Hard”, “Hardware”, “Fire”, “Packs”, “Tickets”, “Boy”, “Her’ on”, “Painers”, “Eatables”, “Percs”, “P’s”, “Blues”, “10s”, “15s” “20s”, “20<sup>th</sup>”, “Deuces”, “30s”, “30<sup>th</sup>”, “Vikes”, “V’s”, “75’s”, “750’s”, “Bars”, “Juices”, “Fish”, “Melt” “Zannies”, and “Footballs”, in telephone conversations when referring to transactions involving heroin, cocaine base (“crack”), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax), to avoid law enforcement suspicion.

I. It was further part of the conspiracy that ALLEN GRAVES, MARTEZ MONTGOMERY, TERRANCE LOMBARD, EDWARD HEARN, DARRYL MCFADDEN, JERONNE WHITE, CHRISTOPHER PRINCE, DANNI CHILDERS, DECARLOS BATES, DEVONTA ADAMS, JASON GRAVES, MARNIECE LOVE, BRITTANY PAYNE, MARCUS BENSON, GREG BURKETT, DARRELL JACOBS, DANIELLE SULLIVAN, STEVEN LESTER, ABBEE HEINE, and others, distributed heroin, cocaine base (“crack”), Oxycodone (Percocet), Methylphenidate (Ritalin), Hydrocodone (Vicodin), and Alprazolam (Xanax), and other drugs, with and to juveniles at the various locations where the conspiracy operated.

#### OVERT ACTS

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed overt acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. On July 10, 2012, at approximately 10:25 a.m., a person cooperating with law enforcement (hereinafter "Source 1") met ALLEN GRAVES at 435 Lee Street, Marion, Ohio. During the meeting, ALLEN GRAVES sold Source 1 approximately .4 grams of heroin for \$100.

2. On July 29, 2012, MARTEZ MONTGOMERY possessed approximately 1,463 assorted prescription pills (including Hydrocodone, Oxycodone and Xanax) and approximately 60.8 grams of cocaine base ("crack") in Hancock County, Ohio.

3. On October 1, 2012, at approximately 5:55 p.m., Source 1 met ALLEN GRAVES at 435 Lee Street, Marion, Ohio. During the meeting, ALLEN GRAVES sold Source 1 approximately .7 grams of crack cocaine for \$100.

4. On October 2, 2012, at approximately 5:55 p.m., Source 1 met ALLEN GRAVES and DEVONTA ADAMS at 435 Lee Street, Marion, Ohio. During the meeting, ALLEN GRAVES sold Source 1 approximately .7 grams of crack cocaine for \$100.

5. On December 21, 2012, MARTEZ MONTGOMERY, BRITTANY PAYNE, and Juvenile #1 possessed approximately 2,249 assorted prescription pills (including Hydrocodone and Alprazolam) near Taylor, Michigan, while traveling southbound on Interstate 75 toward Marion, Ohio.

6. On December 21, 2012, ALLEN GRAVES and DANIELLE SULLIVAN possessed approximately 1,603 assorted prescription pills (including Oxycodone, Hydrocodone and Methadone) near Findlay, Ohio, while traveling on Ohio State Route 68 toward Marion, Ohio.

7. On December 31, 2012, DANNI CHILDERS possessed approximately \$3,698 in U.S. currency and MARTEZ MONTGOMERY possessed approximately \$60 in U.S. currency near Taylor, Michigan, while traveling northbound on Interstate 75 toward Detroit, Michigan.

8. On January 14, 2013, at approximately 3:28 p.m., a person cooperating with law enforcement (hereinafter "Source 2") called telephone number (740) 262-9656 and had a conversation with JERONNE WHITE. WHITE instructed Source 2 to go to 435 Lee Street, Marion, Ohio, to purchase heroin. In a second call a short time later, WHITE changed the location and instructed Source 2 to go to 238 Park Boulevard, Marion, Ohio.

9. On January 14, 2013, Source 2 arrived at 238 Park Boulevard, Marion, Ohio, and met with MARTEZ MONTGOMERY and DECARLOS BATES. During this meeting, BATES sold Source 2 approximately .2 grams of heroin for \$120. BATES told Source 2 to contact him at telephone number (419) 617-5095 for future transactions.

10. On January 16, 2013, Source 2 called (419) 617-5095 and spoke to an unknown male. Source 2 asked, "Can I swing through (238 Park Boulevard, Marion, Ohio) real quick (to purchase heroin)?" The unknown male replied, "Yeah." Source 2 arrived at 238 Park Boulevard, Marion, Ohio, approximately five minutes later and met with DECARLOS BATES. During this meeting, BATES sold Source 2 approximately .3 grams of heroin for \$120.

11. On January 22, 2013, at approximately 2:10 p.m., Source 2 arrived at the Speedway gas station on Bellefontaine Avenue, Marion, Ohio, and met with JERONNE WHITE. During the meeting, WHITE sold Source 2 approximately .2 grams of heroin for \$120.

12. On January 23, 2013, at approximately 10:59 a.m., Source 2 arrived at the 428 North State Street, Marion, Ohio, and met with MARTEZ MONTGOMERY and JERONNE WHITE. MONTGOMERY was seated at a table inside the residence counting prescription pills

in the presence of STEVEN LESTER, CHRISTOPHER PRINCE, JERONNE WHITE, and DANNI CHILDERS. During the meeting, MONTGOMERY sold Source 2 approximately 2.4 grams of crack cocaine for \$250.

13. On January 23, 2013, at approximately 6:04 p.m., Source 2 arrived at the McDonald's on North Main Street, Marion, Ohio, and entered a vehicle occupied by JERONNE WHITE, BRITTANY PAYNE, and CHRISTOPHER PRINCE. During the meeting, WHITE and PRINCE sold Source 2 approximately 3.3 grams of crack cocaine for \$500.

14. On January 25, 2013, at approximately 1:52 p.m., Source 2 called (419) 617-5095 and spoke to DECARLOS BATES. Source 2 asked if he/she could "come through (238 Park Boulevard, Marion, Ohio)?" BATES said yes. At approximately 1:58 p.m., Source 2 arrived at 238 Park Boulevard, Marion, Ohio, and met with BATES. During this meeting, BATES sold Source 2 approximately .4 grams of crack cocaine for \$50.

15. On February 7, 2013, MARTEZ MONTGOMERY and STEVEN LESTER traveled to Todd's Auto Sales in Marion, Ohio. While at the dealership, MONTGOMERY purchased a 2006 Chevrolet Malibu for \$2,145 in U.S. currency. Despite not possessing or paying for the vehicle, LESTER obtained the temporary Ohio license plate for the vehicle and was listed in the purchase agreement as the owner.

16. On February 9, 2013, located inside of 238 Park Boulevard, Marion, Ohio, a residence previously rented by DANNI CHILDERS, were documents in the name of JERONNE WHITE, a digital scale, a letter addressed to TEZ (MARTEZ MONTGOMERY), a previously stolen Ruger Redhawk .44 caliber revolver, approximately 2.1 grams of cocaine base ("crack"), .7 grams of heroin, 36 Oxycodone 30 mg pills, 29 Oxycodone 20 mg pills, 37 Oxycodone 15 mg pills, and 18 Hydrocodone pills.



17. On February 18, 2013, Source 2 met DEVONTA ADAMS inside of 428 North State Street, Marion, Ohio, and purchased approximately .3 grams of heroin from ADAMS for \$120. During the meeting, ADAMS stated, "I got a lot of that shit (heroin)." Source 2 stated, "They like hard (crack cocaine) too." ADAMS replied, "I got a lot of that shit too. I got a cookie of hard (one ounce of crack cocaine) right now. I can get six more grams. I can do whatever the f\*\*\* they want."

18. On February 18, 2013, at approximately 1:32 p.m., a person cooperating with law enforcement (hereinafter "Source 3") arrived at 428 North State Street, Marion, Ohio, and met with MARNIECE LOVE in the driveway of the residence. During this meeting, LOVE sold Source 3 approximately .3 grams of cocaine base ("crack") for \$50 and .3 grams of heroin for \$130.

19. On February 19, 2013, Source 2 met CHRISTOPHER PRINCE near 428 North State Street, Marion, Ohio, and purchased approximately 1.5 grams of cocaine base ("crack") from PRINCE for \$150.

20. On February 20, 2013, at approximately 6:05 p.m., Source 2 met DECARLOS BATES inside of 428 North State Street, Marion, Ohio, and purchased approximately 1.5 grams of cocaine base ("crack") from BATES for \$200.

21. Later, on February 20, 2013, Source 2 met MARTEZ MONTGOMERY inside of 428 North State Street, Marion, Ohio. During the meeting, MONTGOMERY told Source 2 that he would sell Source 2 "8-balls (3.5 gram amounts)" of cocaine base ("crack") for \$200.

22. On February 20, 2013, at approximately 7:00 p.m., Source 3 met DEVONTA ADAMS at the back door of 428 North State Street, Marion, Ohio. During the meeting,

ADAMS sold Source 3 approximately .8 grams of cocaine base ("crack") for \$100 and approximately .1 gram of heroin for \$50.

23. On February 20, 2013, at approximately 10:25 p.m., Source 2 met DECARLOS BATES, CHRISTOPHER PRINCE, MARNIECE LOVE, and DEVONTA ADAMS inside of 428 North State Street, Marion, Ohio. During the meeting, PRINCE sold Source 2 approximately .7 grams of cocaine base ("crack") for \$200.

24. On February 21, 2013, at approximately 2:19 p.m., Source 2 met MARTEZ MONTGOMERY, DEVONTA ADAMS, DECARLOS BATES, CHRISTOPHER PRINCE, MARNIECE LOVE, and JERONNE WHITE inside of 428 North State Street, Marion, Ohio. During the meeting, MONTGOMERY and PRINCE sold Source 2 approximately 5.7 grams of cocaine base ("crack") for \$800. During the sale, PRINCE told Source 2, "They all two hundred (dollars), they all, what you're paying for 'em, all balls (8-balls or 3.5 gram amounts), right here, they all in there. Like I did yesterday, I put more in there like I did yesterday, I put more."

25. On February 21, 2013, at approximately 2:35 p.m., Source 2 called (419) 617-5095 and spoke to MARTEZ MONTGOMERY. During the call, Source 2 complained that the drug weight was "short." MONTGOMERY replied, "I had weighed it all up before I gave it to you. . . There might have been a 'lil tenths off it or something, but I'll replace it any time you come through."

26. On February 26, 2013, at approximately 4:50 p.m., Source 3 arrived at 428 North State Street, Marion, Ohio, and met with CHRISTOPHER PRINCE. During this meeting, PRINCE sold Source 3 approximately .8 grams of cocaine base ("crack") for \$150.

27. On February 28, 2013, at approximately 5:55 p.m., Source 2 arrived at 432 Olney Avenue, Marion, Ohio, and met with JERONNE WHITE and MARNIECE LOVE. During this

meeting, WHITE sold Source 2 approximately one ounce of purported cocaine base (“crack”) for \$1,200. The purported cocaine base (“crack”) was actually soap.

28. On March 7, 2013, at approximately 4:25 p.m., Source 2 called (419) 617-5095 and spoke to CHRISTOPHER PRINCE. During the call, Source 2 asked if Source 2 could come through to get an “8-ball” (3.5 grams of cocaine base (“crack”)). PRINCE replied, “Yeah, it’s two fifty (\$250).” A short time later, Source 2 met PRINCE at 428 North State Street, Marion, Ohio. During the meeting, PRINCE conducted a “pat-down” search of Source 2 and also checked under Source 2’s shirt. PRINCE told Source 2, “I’m saying though, if you on some bullshit, you the f\*\*\*ing police, you know I know where your Auntie live at.” Thereafter, PRINCE sold Source 2 approximately one gram of cocaine base (“crack”) for \$250.

29. On March 13, 2013, at approximately 1:55 p.m., Source 2 called (419) 617-5095 and spoke to CHRISTOPHER PRINCE. During the call, Source 2 asked, “Two fifty each, right (\$250 for 3.5 grams of cocaine base (“crack”))?” PRINCE replied, “I can do two seventy five (\$275).” Source 2 asked, “How is it going from two fifty a week ago and now it’s two seventy five? I only have five hundred (\$500).” PRINCE said, “Alright, come on.”

30. On March 13, 2013, at approximately 2:58 p.m., Source 2 met with CHRISTOPHER PRINCE and DECARLOS BATES at 576 Sugar Street, Marion, Ohio. During the meeting, BATES sold Source 2 approximately 4 grams of cocaine base (“crack”) for \$500. PRINCE instructed Source 2 to come to the Sugar Street address from now on and not the North Street address.

31. On March 13, 2013, at approximately 5:05 p.m., DEVONTA ADAMS, after returning from Detroit, Michigan, possessed approximately 50 “Watson 387” (Hydrocodone) 750 mg pills near the Greyhound Bus Station in Marion, Ohio.

32. On March 15, 2013, at approximately 2:00 p.m., Source 2 called (419) 617-5095 and spoke to CHRISTOPHER PRINCE. During the call, Source 2 said, "I need to swing through here in like twenty minutes or less and grab two balls (two 3.5 gram amounts of cocaine base ("crack"))." PRINCE replied, "Alright, I got you." Source 2 said, "I got 500 (dollars)." PRINCE replied, "Alright." At approximately 2:19 p.m., Source 2 met PRINCE at 576 Sugar Street. During the meeting, PRINCE sold Source 2 approximately 3.7 grams of cocaine base ("crack") for \$500.

33. On March 26, 2013, at approximately 1:58 p.m., a person cooperating with law enforcement (hereinafter "Source 4") met with Juvenile #1 and CHRISTOPHER PRINCE at 432 Olney Avenue, Marion, Ohio. During the meeting, Juvenile #1 and PRINCE pooled their drugs and sold Source 4 approximately .7 grams of crack cocaine for \$100.

34. On May 9, 2013, at approximately 4:02 p.m., a person cooperating with law enforcement (hereinafter "Source 5") arrived at 344 Milburn Avenue, Marion, Ohio, and met with JERONNE WHITE and MARNIECE LOVE. During this meeting, WHITE and LOVE sold Source 5 approximately .2 grams of cocaine base ("crack") for \$50.

35. On May 10, 2013, at approximately 11:57 a.m., Source 5 arrived at 344 Milburn Avenue, Marion, Ohio, and met with MARNIECE LOVE. LOVE told Source 5, "I don't got no hard (cocaine base ("crack")) . . . just packs (heroin)." LOVE told Source 5 that Source 5 would have to wait for JERONNE WHITE to arrive. At approximately 12:10 p.m., JERONNE WHITE arrived and sold Source 5 approximately .2 grams of cocaine base ("crack") for \$50.

36. On May 14, 2013, at approximately 4:00 p.m., Source 5 called MARNIECE LOVE on the telephone. Source 5 said, "I need some hard (cocaine base ("crack")), you guys good?" LOVE replied, "Yeah, how much you need?" Source 5 replied, "Fifty, fat fifty (\$50

worth of cocaine base ("crack")). It's two for one day isn't it?" LOVE replied, "Yeah, come on." At approximately 4:07 p.m., Source 5 arrived at 344 Milburn Avenue, Marion, Ohio, and met with MARNIECE LOVE. During this meeting, LOVE sold Source 5 approximately .4 grams of cocaine base ("crack") for \$50.

37. On May 17, 2013, at approximately 1:39 p.m., Source 5 arrived at 344 Milburn Avenue, Marion, Ohio, and met with MARNIECE LOVE. During this meeting, LOVE sold Source 5 approximately 1.1 grams of cocaine base ("crack") for \$150.

38. On May 23, 2013, at approximately 9:18 a.m., Source 5 arrived at 344 Milburn Avenue, Marion, Ohio, and met with MARNIECE LOVE. During this meeting, LOVE sold Source 5 approximately .2 grams of cocaine base ("crack") for \$150.

39. On May 28, 2013, at approximately 2:47 p.m., Source 5 called (419) 617-5095 and spoke to JASON GRAVES. During the conversation, Source 5 asked JASON GRAVES if he had any "hard" (cocaine base ("crack")). JASON GRAVES replied that he did and told Source 5 to meet him at the "same spot" (438 1/2 North Prospect Street, Marion, Ohio). A short time later, Source 5 arrived at 438 1/2 North Prospect Street, Marion, Ohio, and met with ABBEE HEINE and JASON GRAVES. During the meeting, HEINE and JASON GRAVES sold Source 5 approximately .6 grams of crack cocaine for \$50.

40. On May 30, 2013, at approximately 2:29 p.m., MARTEZ MONTGOMERY called (419) 617-5095 and spoke to Juvenile #1. During the call, MONTGOMERY asked, "Is shit (drugs) moving (selling) good for y'all, or it slow?" Juvenile #1 replied, "Hell no. Slow as f\*\*\* bro. Every day I wake up; I only make about \$300 and go to sleep n\*\*\*a."

41. On June 6, 2013, at approximately 10:52 a.m., Source 5 called (419) 617-5095 and spoke to JERONNE WHITE. During the conversation, Source 5 asked WHITE for a

“hundred rock” (\$100 worth of cocaine base (“crack”)). A short time later, Source 5 met WHITE and JASON GRAVES at 438 1/2 North Prospect Street, Marion, Ohio. During the meeting, WHITE sold Source 5 approximately .6 grams of cocaine base (“crack”) for \$100.

42. On June 7, 2013, at approximately 10:47 a.m., Source 5 met JERONNE WHITE at 438 1/2 North Prospect Street, Marion, Ohio. During the meeting, WHITE sold Source 5 approximately .6 grams of cocaine base (“crack”) for \$100.

43. On June 11, 2013, at approximately 4:57 p.m., a person cooperating with law enforcement (hereinafter “Source 6”) called (419) 569-8364 and spoke to JASON GRAVES. During the conversation, Source 6 asked JASON GRAVES for a “dollar” (\$100) of “hardware” (cocaine base (“crack”)). A short time later, Source 6 met JASON GRAVES at 624 Wilson Avenue, Marion, Ohio. During the meeting, JASON GRAVES sold Source 6 approximately .4 grams of cocaine base (“crack”) for \$100.

44. On June 13, 2013, at approximately 2:40 p.m., Source 6 called (419) 617-5095 and spoke to CHRISTOPHER PRINCE. During the conversation, Source 6 asked PRINCE for “the hardware” (cocaine base (“crack”)). PRINCE replied, “Yeah.” At approximately 3:15 p.m., Source 6 arrived at 438 1/2 North Prospect, Marion, Ohio, and met with PRINCE. During the meeting, PRINCE sold Source 6 approximately .2 grams of cocaine base (“crack”) for \$50 and one Methadone pill for \$8.

45. On June 18, 2013, at approximately 5:15 p.m., Source 6 called (419) 617-5095 and spoke to JERONNE WHITE. Source 6 asked WHITE, “You got a dollar (\$100) of hardware (cocaine base (“crack”))?” WHITE replied, “Yes Sir.” A short time later, Source 6 met WHITE at 624 Wilson Avenue, Marion, Ohio. During the meeting, WHITE sold Source 6 approximately .6 grams of cocaine base (“crack”) for \$100.

46. On June 18, 2013, at approximately 5:52 p.m., Source 6 called (419) 617-5095 and spoke to DECARLOS BATES. A short time later, Source 6 met BATES at 624 Wilson Avenue, Marion, Ohio. During the meeting, BATES sold Source 6 approximately 1.1 grams of cocaine base ("crack") for \$200.

47. On June 19, 2013, at approximately 5:32 p.m., Source 6 called (419) 617-5095 and spoke to DECARLOS BATES. During the conversation, Source 6 asked BATES for "two hundred hardware" (\$200 worth of cocaine base ("crack")). A short time later, Source 6 arrived at 438 1/2 North Prospect Street, Marion, Ohio, and saw JERONNE WHITE, CHRISTOPHER PRINCE, STEVEN LESTER, JASON GRAVES, Juvenile #1, and BATES. During the meeting, BATES sold Source 6 approximately 1.4 grams of cocaine base ("crack") for \$200.

48. On June 26, 2013, at approximately 5:32 p.m., Source 6 called (419) 617-5095 and spoke to CHRISTOPHER PRINCE. During the conversation, Source 6 asked PRINCE for "two hundred hardware" (\$200 worth of cocaine base ("crack")). PRINCE replied, "Stop sayin' that man, you gotta come up here man." At approximately 5:49 p.m., Source 6 arrived at 438 1/2 North Prospect Street, Marion, Ohio. JASON GRAVES answered the door and let Source 6 in the residence. Once inside, JASON GRAVES said, "Yo ass come in here lookin' like the cops fo sho." Thereafter, JASON GRAVES conducted a "pat-down" search of Source 6's clothing. Afterwards, PRINCE sold Source 6 approximately 1.3 grams of cocaine base ("crack") for \$200.

49. On June 27, 2013, at approximately 4:02 p.m., Source 6 called (419) 617-5095 and spoke to CHRISTOPHER PRINCE. During the conversation, Source 6 asked PRINCE for "three hundred worth" (\$300 worth of cocaine base ("crack")). PRINCE replied, "Alright." At approximately 4:20 p.m., Source 6 arrived at 438 1/2 North Prospect Street, Marion, Ohio, and met with CHRISTOPHER PRINCE and JASON GRAVES in the kitchen of the residence. At

this time, JASON GRAVES was holding a revolver in his right hand and told Source 6, "You're scared." Afterwards, PRINCE sold Source 6 approximately 1.2 grams of cocaine base ("crack") for \$300.

50. On July 12, 2013, at approximately 4:21 p.m., Source 6 called (419) 617-5095 and spoke to DECARLOS BATES. A short time later, Source 6 met BATES at 323 Mound Street, Marion, Ohio. During the meeting, BATES sold Source 6 approximately .8 grams of cocaine base ("crack") for \$200.

51. On July 19, 2013, at approximately 5:10 p.m., Source 6 called (419) 617-5095 and spoke to DECARLOS BATES. A short time later, Source 6 met BATES at 323 Mound Street, Marion, Ohio. During the meeting, BATES sold Source 6 approximately 2.1 grams of cocaine base ("crack") for \$300.

52. On July 24, 2013, at approximately 6:39 p.m., Source 6 called (419) 617-5095 and spoke to JERONNE WHITE. During the conversation, Source 6 asked, "You got the 30s (Percocet 30 mg pills)?" WHITE replied, "No, I got 20s now (Percocet 20 mg pills)." Source 6 asked, "Got 20s, still got the packs (heroin)?" WHITE replied, "Yeah." Source 6 said, "Alright, I be over there, I need like eight packs and a 20." WHITE replied, "Alright." A short time later, Source 6 met WHITE at 323 Mound Street, Marion, Ohio. During the meeting, WHITE sold Source 6 approximately .1 gram of heroin and one Percocet 20 mg pill for \$100.

53. On August 2, 2013, at approximately 2:45 p.m., Source 6 met DECARLOS BATES and CHRISTOPHER PRINCE at 323 Mound Street, Marion, Ohio. During the meeting, BATES and PRINCE pooled their drugs and sold Source 6 six Xanax (Alprazolam) pills and six 30 mg Percocet (Oxycodone) pills for \$242.



54. On August 9, 2013, at approximately 4:09 p.m., DARRELL JACOBS called JERONNE WHITE at telephone number (419) 617-5095. During the call, JACOBS said, "What's up man? What's up? I quit coming by, 'cause muh f\*\*\*\*\*g you guys need to give us some better deals, so I'm come down f\*\*\* with you right quick, see what you gonna throw me together." WHITE replied, "What you tryin' to get?" JACOBS stated, "I'm f\*\*\*\*\*g come down, grab like a dollar (\$100 worth of cocaine base ("crack")) or somethin', I'ma then, I got somebody else (a drug customer), coming through. I'll come through again, grab another dollar."

55. On August 9, 2013, at approximately 5:35 p.m., ALLEN GRAVES called JERONNE WHITE and Juvenile #1 on the telephone. During their conversation, ALLEN GRAVES asked WHITE, "Hey dog, how's it (drug sales) doing over there (323 Mound Street)?" WHITE answered, "Doing alright." ALLEN GRAVES followed up by asking, "That hard (cocaine base ("crack")) been pickin' up too huh?" WHITE replied, "Yeah, a little." ALLEN GRAVES then asked, "That. That (drug supply). Chris (CHRISTOPHER PRINCE) left you, you started on that already?" WHITE responded, "I still got a nine (nine grams of cocaine base ("crack"))." ALLEN GRAVES asked, "Oh, you had started on your nine already?" WHITE replied, "Yeah." ALLEN GRAVES asked WHITE to let him talk to Juvenile #1. ALLEN GRAVES then told Juvenile #1, "Dog, I need them dollars dog. I got shit on the flow in the, in the D (Detroit). I need them dollars what's up?" Juvenile #1 advised, "This hard (cocaine base ("crack")) ain't moving for shit." ALLEN GRAVES responded, "Man that nigga BURGER (JERONNE WHITE) just said shit moving." Juvenile #1 stated, "It ain't moving like that." ALLEN GRAVES then asked, "Dog, but the other shit (other drugs) I'm sayin'. I know you have other shit. Is that shit moving?" Juvenile #1 replied, "Yeah, not like that though." ALLEN GRAVES asked, "I'm sayin' what you got, you got a rack (\$1,000) (UI - unintelligible) P ("P" is

an alias used by Juvenile #1, short for his primary alias "Pimp")?" Juvenile #1 responded, "Hell nah." ALLEN GRAVES then asked, "Dog, dog (UI) alright, what you got n\*\*\*a?" Juvenile #1 replied, "Shit (UI), I don't know (UI), I gotta count it n\*\*\*a."

56. On August 9, 2013, at approximately 5:40 p.m., Juvenile #1 called ALLEN GRAVES on the telephone. During the conversation, Juvenile #1 said, "Yeah, I just counted this shit. I got um, 250 (dollars)." ALLEN GRAVES responded, "Man, God Damn P. Dog, I don't know how the f\*\*\* you got that, that left dog everybody else (UI) got more than you. JASON (GRAVES) just gave me 250 (dollars). How the f\*\*\* they doing more than you?"

57. On August 9, 2013, at approximately 11:29 p.m., K.H. (a person known to the grand jury, but not indicted herein) called JERONNE WHITE on the telephone. During the conversation, K.H. asked, "Hey, you good over there on the boy (heroin)?" WHITE replied, "Yeah." K.H. said, "Alright, I'mma come get a fifty (\$50 worth of heroin)." WHITE replied, "Alright."

58. On August 10, 2013, at approximately 1:14 a.m., DARRELL JACOBS called JERONNE WHITE on the telephone. During the call, JACOBS said, "I didn't come back over there a little bit ago 'cause that mother f\*\*\*\*n' hard (cocaine base ("crack")) is not no good. That hard mother f\*\*\*\*n' ain't all that good." WHITE replied, "I gave you?" JACOBS stated, "They (drug customers) did not like that at all. I even tried it mother f\*\*\*\*g (UI). I told them I would come back over there, I'ma grab a twenty off you, see if mother f\*\*\*\*g if it's any different or whatever, but yeah, that shit's f\*\*\*\*d up." WHITE replied, "Alright."

59. On August 10, 2013, at approximately 2:38 a.m., B.G. (a person known to the grand jury, but not indicted herein) called JASON GRAVES on the telephone. During the call, B.G. said, "... this shit (cocaine base ("crack")) out the bag bro, (UI) to put on the scaley

(scale)." JASON GRAVES replied, "Yeah. What was it?" B.G. replied, "point two (.2 grams), but it's gooey bro. . . It's not even hard. It like, like it's almost like gooey like Vaseline." Later, JASON GRAVES said, "Well, that's when I said when I chopped it up (prepared the cocaine base ("crack")) and everything, it was hard, it came up to uh, you know what I'm sayin' point five (.5 grams)." B.G. replied, "Yeah, I, I swear to God, it's not no point five right now."

60. On August 10, 2013, at approximately 7:50 p.m., K.H. called JASON GRAVES on the telephone. During the conversation, K.H. asked, "Hey, are you good over there still?" JASON GRAVES replied, "Umm, nah. I ain't got, I ain't got no packs (heroin)." K.H. asked, "You got hard (cocaine base ("crack")) right?" JASON GRAVES replied, "Yeah."

61. On August 11, 2013, at approximately 6:46 p.m., J.H. (a person known to the grand jury, but not indicted herein) called JASON GRAVES on the telephone. During the call, JASON GRAVES asked, "What's up?" J.H. replied, "Not shit. Uh, Brent's (drug customer) on his way over there. He needs, uh, hardware (cocaine base ("crack"))." JASON GRAVES replied, "Aight."

62. On August 12, 2013, at approximately 10:00 p.m., J.H. called JASON GRAVES on the telephone. During the call, J.H. asked, "Hey, you got any Perc 30s (Percocet 30 mg pills)?" JASON GRAVES replied, "Good morning to you too." J.H. laughed and said, "How I am." JASON GRAVES said, "No, not right now. . ." Later in the conversation, J.H. asked, "Ok, ah, hardware (cocaine base ("crack")) good?" JASON GRAVES replied, "Uh huh." J.H. said, "Alright, well I'll probably be through here in just a little bit."

63. On August 12, 2013, at approximately 3:21 p.m., B.S. (a person known to the grand jury, but not indicted herein) called JASON GRAVES on the telephone. During the call, B.S. asked, "Do you got any Zannies (Xanax pills)?" JASON GRAVES replied, "Shit, uh, not at

the moment.” B.S. replied, “Damn, I was trying to get some Zanies or some China (heroin).” JASON GRAVES asked, “Or some what?” B.S. repeated, “Or some China.” JASON GRAVES asked, “Some China?” B.S. replied, “Yeah.” JASON GRAVES asked, “Like Christin (a heroin customer) right?” B.S. replied, “Yeah.” JASON GRAVES stated, “Ok, yeah, I’ll have some in uh, about two hours. I’m waiting on some.”

64. On August 12, 2013, at approximately 9:20 p.m., DARRELL JACOBS called Juvenile #1 on the telephone. During the call, JACOBS asked, “Hey, you got some f\*\*\*in’ uh, hard (cocaine base (“crack”))?” Juvenile #1 said, “Yeah, what you need?” JACOBS asked, “It ain’t f\*\*\*in’ that one bullshit (low quality crack cocaine) is it?” Juvenile #1 said, “Nah, hell nah.” JACOBS said, “Aight, I’m waiting on somebody (drug customer) to get here, I’ll, I’ll, I’ll, I’ll be through.” Juvenile #1 asked, “What you tryin’ to get (how much crack do you need)?” JACOBS said, “I’m not sure yet dude. I’m waiting on bro (drug customer) to get here.”

65. On August 13, 2013, at approximately 12:57 p.m., JASON GRAVES called JERONNE WHITE on the telephone. During the call, WHITE said, “Hey, tell DANNI (CHILDERS) get me 10 bars (Xanax pills) ready bro.” JASON GRAVES replied, “I can’t hear you.” WHITE stated, “I said, tell DANNI to get me 10 bars. . .” JASON GRAVES replied, “Aight.”

66. On August 13, 2013, at approximately 5:07 p.m., DARRELL JACOBS called JASON GRAVES on the telephone. During the call, JACOBS asked, “Hey, what’s on deck over there on the pain pill side? . . . What’s all over there?” JASON GRAVES replied, “Just some hard (cocaine base (“crack”)) and some packs (heroin) n\*\*\*a.” JACOBS asked, “What, what is it?” JASON GRAVES repeated, “Hard and packs.” JACOBS asked, “Huh?” JASON GRAVES said, “TODD (DARRELL JACOBS) man, come on.” JACOBS replied, “Well, I can’t

understand you. I'm sittin' here with somebody (drug customer) that just got off work, they interested in some. I need to know if you got Vikes (Vicodin), Perc's (Percocet), Mexadone, Methadone, what?" JASON GRAVES replied, "Hard and packs man."

67. On August 13, 2013, at approximately 5:10 p.m., JASON GRAVES sent the following text message to DARRELL JACOBS: "Look man dont be name stuff over the phone we only got tickets (heroin) and hard (cocaine base ("crack"))".

68. On August 15, 2013, at approximately 5:51 p.m., DARRELL JACOBS called JERONNE WHITE on the telephone. During the call, JACOBS asked, "What all is good over there?" WHITE replied, "Bars (Xanax pills), 750s (Vicodin pills), packs (heroin) and um, hard (cocaine base ("crack"))." JACOBS asked, "Where are all the 30s (Percocet 30 mg pills) at?" WHITE replied, "They gone. They sold 'em all."

69. On August 16, 2013 at approximately 8:29 p.m., ALLEN GRAVES called JASON GRAVES and JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES instructed JASON GRAVES, "Hey um, call everybody (drug customers) and tell 'em I got them deuces (Percocet 20 mg pills) on deck." JASON GRAVES replied, "Alright, I got you." ALLEN GRAVES then told JASON GRAVES, "Let me holla at BURGER (JERONNE WHITE) right quick." WHITE said, "Talk to me." ALLEN GRAVES replied, "Hey, call everybody now. I'll be there in like 35 minutes."

70. On August 17, 2013 at approximately 12:15 a.m., JERONNE WHITE called DARRELL JACOBS on the telephone. During their conversation, WHITE said, "You can come buy, you can come buy this whole 200 (200 Percocet 30 mg pills) from me. I'll sell it to you for 26 (\$26 per pill) right now." JACOBS replied, "Why, why in the f\*\*\* am I gonna go give you 26 when I can go get the mother f\*\*\*ers right now for 25 (\$25)?" WHITE replied, "Why 25,

you sell them for 24 then? It for 24? . . . You can buy the 200. You can buy the whole 200 from me right now.” JACOBS replied, “When he (another supplier) gets here, tomorrow or Sunday, he is gonna lower it back down to like 22, 23. Dog, do you know how much money I was going through on the hardware (crack cocaine)?” WHITE replied, “Alright, I’mma call you later. I’ll let you know we got ‘em if you need ‘em, that’s all.”

71. On August 17, 2013, at approximately 6:34 p.m., DANNI CHILDERS sent the following text message to (419) 617-5095, the “community phone”: “Tez (MARTEZ MONTGOMERY) said since y’all makin tht extra \$\$ y’all gone pay him since u payed Unc (ALLEN GRAVES)?”

72. On August 18, 2013, at approximately 12:53 a.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES asked WHITE, “Where is Sharp Street? How far is Sharp Street from there?” WHITE replied, “I don’t know.” ALLEN GRAVES said, “That’s why I’m askin’ you know. I’m listening to the scanner (police scanner). They (police) was talking about some bring a camera (surveillance). Come past um, Sharp Street at um, Columbia.”

73. On August 18, 2013, at approximately 2:43 a.m., DANNI CHILDERS sent the following text message to (419) 617-5095, the “community phone”: “Y’all gonna have some \$\$ for me?”

74. On August 18, 2013, at approximately 2:28 p.m., DANNI CHILDERS sent the following text message to (419) 617-5095, the “community phone”: “Ill be over to get what y’all got (money) in a lil If y’all got anything.”

75. On August 18, 2013, at approximately 2:35 p.m., JASON GRAVES called DANNI CHILDERS on the telephone. JASON GRAVES said, “Yeah, hey uh, BURGER

(JERONNE WHITE) said they about to meet you at the house. I gave him uh, he know what it is." CHILDERS asked, "You said what?" JASON GRAVES advised, "I said BURGER, BURGER about to meet you at the house. He got it (money)." CHILDERS confirmed, "BURGER's about to meet me at the house, he's got it?" JASON GRAVES replied, "Yeah. He know what it is. I can't tell you. I'll text you it though. You hear me?" At approximately 2:40 p.m., JASON GRAVES sent CHILDERS the following text message: "I gave him 160 (dollars) for you pimp (Juvenile #1) And b (JERONNE WHITE) on they way there." At approximately 2:48 p.m., JERONNE WHITE and Juvenile #1 arrived at 207 Neil Avenue, Marion, Ohio 43302.

76. On August 19, 2013, at approximately 10:55 a.m., JERONNE WHITE called DARRELL JACOBS on the telephone. During the call, JACOBS asked, "Yeah, you got any Vikes (Vicodin) over there?" WHITE replied, "Nope, I got 30s and 20s (Percocet 30 mg and 20 mg)." JACOBS said, "Alright, alright, I just had somebody (drug customer) call that's why."

77. On August 20, 2013, at approximately 7:34 p.m., J.H. called JASON GRAVES on the telephone. During the conversation, J.H. asked, ". . . um, you got any Percs (Percocet pills)?" JASON GRAVES replied, "Yeah." J.H. asked, "Which ones?" JASON GRAVES replied, "20s and 30s (20 mg and 30 mg pills)." J.H. asked, "Oh, you ain't got nothing small?" JASON GRAVES replied, "Nope." J.H. said, "Alright, well, I'll hit 'em (drug customers) up and see what they say."

78. On August 20, 2013, at approximately 8:03 p.m., a person cooperating with law enforcement (hereinafter "Source 7") met ALLEN GRAVES at 410 North State Street, Marion, Ohio. During the meeting, ALLEN GRAVES sold Source 7 ten Percocet 20 mg pills for \$200. ALLEN GRAVES told Source 7 to go to the distribution location on 323 Mound Street if Source 7 wanted to buy any Percocet 30 mg pills for \$26 each. ALLEN GRAVES said, "That was on

that note because I had like 1,000 of 'em (Percocet 30 mg pills), so I was lettin' them bitches go for 27 (\$27 per pill)."

79. On August 21, 2013, at approximately 12:29 a.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES asked, "Hey n\*\*\*a, all your shit, everything is bagged up you got dog? 'Cause I need like about four, four Gs (grams)." WHITE replied, "Yeah, everything bagged up." ALLEN GRAVES responded, "Well n\*\*\*a, I'm bringing my, my things over there. I gotta, we gotta unbag everything. I'll be over there when I get back."

80. On August 21, 2013, at approximately 5:44 p.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During the conversation, ALLEN GRAVES asked, "What's the word dog? There ain't no more 3's (Percocet 30 mg pills)?" WHITE replied, "Nope. That's why I asked you." ALLEN GRAVES stated, "That's what (UI) I'm sayin', damn. Man that's crazy, everybody should have my money." WHITE responded, "N\*\*\*a, I gave it to you mother f\*\*\*er." ALLEN GRAVES replied, "N\*\*\*a, you still up some Gs." WHITE stated, "I know, you forgot I just got (UI)." ALLEN GRAVES replied, "(UI) BURGER, that's what I'm sayin'. JA-BO (JASON GRAVES) shit shouldn't be up no Gs. I mean he should have all my money."

81. On August 23, 2013 at approximately 10:42 a.m., ALLEN GRAVES called Juvenile #1 and JASON GRAVES on the telephone. During their conversation, ALLEN GRAVES asked Juvenile #1, "Hey, where Jay (JASON GRAVES) at?" Juvenile #1 advised, "Sleep." ALLEN GRAVES responded, "He sleep and he ain't got shit, he ain't got no deuces (Percocet 20 mg pills)?" Juvenile #1 stated, "Uh, nope cause Nicole (drug customer) just came through wantin' some, I don't think." ALLEN GRAVES stated, "I know that n\*\*\*a ain't got no



deuces. He's got my money, wake him up." Juvenile #1 then asked JASON GRAVES, "JA-BO. You got some 20s (Percocet 20 mg pills)? Huh? You say no? Hold on, UNC (ALLEN GRAVES) wants you." JASON GRAVES said, "What's good?" ALLEN GRAVES asked, "Cuz, you ain't, you, you ain't got shit?" JASON GRAVES replied, "No, but I got some money for you." ALLEN GRAVES advised, "Alright, I'll be over in a minute."

82. On August 23, 2013 at approximately 11:14 a.m., Juvenile #1 called ALLEN GRAVES on the telephone. During the conversation, Juvenile #1 asked, "Somebody coming through with a 380 (.380 caliber handgun). You want it?" ALLEN GRAVES asked, "How much they want for it?" Juvenile #1 replied, "Shit, I don't know. I'm fittin' to try and get that bitch for 50 dollars." ALLEN GRAVES replied, "Alright, get that bitch. I got some shells for that mother f\*\*\*er too."

83. On August 23, 2013, at approximately 12:28 p.m., JASON GRAVES and JERONNE WHITE called DANNI CHILDERS on the telephone. During the conversation, CHILDERS asked, "Somebody called me?" JASON GRAVES advised, "Yeah, I did. Uh, I had them call you this morning. You get that (money) last night?" CHILDERS replied, "Yeah." JASON GRAVES advised, "Yeah, that was the last of the uh, what I had." CHILDERS replied, "Alright." JASON GRAVES asked, "So, where we at now?" CHILDERS advised, "Well, since you did that, 750 (\$750). Since you did the uh, sack, that one sack (amount of drugs). You owe me, uh, I don't know. I'll have to look on my papers, it's upstairs." JASON GRAVES said, "We was on 160 (dollars)." CHILDERS asked, "Yeah, how much was it?" JASON GRAVES advised, "160." CHILDERS asked, "No, I'm sayin' how much was the, uh, what you gave me?" JASON GRAVES advised, "I gave you everything that was in there. So those, uh, all together was five. You gave me fifty of 'em (pills)." CHILDERS asked, "How much did you give me

last night?" JASON GRAVES replied, "I have you fifty (dollars) last night. That was the last five I had. Yeah, that was the last five I had. So it made it, all of, it made all together five."

CHILDERS asked, "You said if you, uh you said we was at 160. If you gave me 50 that would leave us with 110 wouldn't it?" JASON GRAVES replied, "No, no DANNI, I uh, I been giving you. I been giving you money like every time you come over here. It all up, it add all up to the whole five (\$500)." CHILDERS responded, "Alright, I'm about to look on my paper and see what I got wrote down. But I think you just owe me 50 (dollars) after this, off the old sack."

JASON GRAVES asked, "Off the new (drug supply), off the one you about to bring me now?"

CHILDERS replied, "BURGER (JERONNE WHITE) supposed to have that one I left over there." JASON GRAVES advised, "He ain't never bring me, uh, he ain't never bring none."

CHILDERS responded, "No, I'm sayin', remember that day over there (323 Mound Street) I had uh, I had that sack with me and I left it there?" JASON GRAVES stated, "Oh yeah. BURGER

(JERONNE WHITE) got that." CHILDERS asked, "Is he, oh, is he got into it yet?" JASON

GRAVES then gave JERONNE WHITE the phone. CHILDERS asked WHITE, "Do you still have that um, that sack (drug supply) that I had left over there?" WHITE replied, "Yeah."

CHILDERS asked, "Is, have you got into it?" WHITE replied, "Yeah." CHILDERS responded, "Oh ok, I was just wonderin'."

84. On August 23, 2013, at approximately 10:23 p.m., DANNI CHILDERS called Juvenile #1 on the telephone. CHILDERS asked, "Hey uh, is BURGER (JERONNE WHITE) car there?" Juvenile #1 replied, "Yeah, he here." CHILDERS said, "Ah, ask him if he can bring me a hundred (worth of drugs) over. Tell him I will give him his money when he gets here (207 Neil Avenue, Marion, Ohio)." Juvenile #1 replied, "Alright."

85. On August 23, 2013, at approximately 10:24 p.m., JERONNE WHITE called DANNI CHILDERS on the telephone. WHITE asked, "You call me?" CHILDERS replied, "Yeah, um, can you bring me a hundred (worth of drugs) over here?" WHITE replied, "Yeah." CHILDERS asked, "Can you bring it over here like now? 'Cause this guy's (drug customer) wanting it." WHITE replied, "Alright. I'm on my way." Approximately one half hour later, WHITE arrived at 207 Neil Avenue, Marion, Ohio.

86. On August 23, 2013, at approximately 11:55 p.m., DARRELL JACOBS called JASON GRAVES on the telephone. JACOBS asked, "Hey, where Pimp (Juvenile #1) at?" JASON GRAVES said, "Shit uh, he ain't even here right now." JACOBS replied, "Alright, that's fine. I'll get, just tryin' to holla at him a minute, but hey, I was going to ask you, you know anybody interested in any Klonopins (a prescription drug used to treat seizures and panic disorders) cheap?" JASON GRAVES replied, "Shit, I'll let you know." JACOBS said, "Ma f\*\*\*ing got a 120 of 'em. Even do some trading (for other drugs) if you know somebody."

87. On August 24, 2013, at approximately 12:30 a.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During the conversation, ALLEN GRAVES asked, "Yeah, you got that, that dub (\$20 worth of drugs), that dolla (\$100 worth of drugs) you got from DANNI (CHILDERS)?" WHITE replied, "The half mines and half Pimp's (Juvenile #1)." ALLEN GRAVES responded, "I don't give a f\*\*\*. I need that shit. I'm broke as f\*\*\*. I just gave this n\*\*\*a six f\*\*\*\*\*g bands (\$6,000). I'm broke as f\*\*\*. Dog, do you know dog, this n\*\*\*a (Detroit drug supplier) forgot to bring my shit (drugs)? Man dis, man what the f\*\*\*'s wrong with everybody dog? I'm f\*\*\*\*\*g pissed." WHITE replied, "I don't know. F\*\*\* it." ALLEN GRAVES responded, "Nah, ain't no f\*\*\*\*\*g. How the f\*\*\* you forget to bring the shit? Talkin' 'bout, damn I thought I put it in my bike and shit. I was driving the truck and shit

and just said f\*\*\* it. I'mma ride the bike and shit and I left the shit in the truck by mistake. Get the f\*\*\* outta here." WHITE then stated, "He just gon' have to bring it back tomorrow." ALLEN GRAVES advised, "Yeah I know. He, that's when he bring it back, tomorrow."

88. On August 24, 2013, at approximately 4:46 p.m., ALLEN GRAVES called JASON GRAVES on the telephone. During the conversation, ALLEN GRAVES told JASON GRAVES to stay in Detroit, Michigan, and not to come back to Marion, Ohio. JASON GRAVES indicated he was going to come back to Marion, Ohio, to collect his belongings. ALLEN GRAVES asked, "How the f\*\*\* you gonna tell me you gonna come to my shit (house)?" JASON GRAVES replied, "Hey, hey, last time I checked it was a two man operation (ALLEN GRAVES and MARTEZ MONTGOMERY)." ALLEN GRAVES responded, "Hey dog, this is a one man operation dog. This is my shit. I pay the bills here n\*\*\*a." JASON GRAVES replied, "I done talked to cuz (MONTGOMERY) already." ALLEN GRAVES replied, "Dog, it don't matter. Cuz (MONTGOMERY) don't pay the bills here n\*\*\*a. . . I ain't giving you shit (drugs), so what you even gonna be here (in Marion) for?"

89. On August 25, 2013, at approximately 12:03 p.m., DANNI CHILDERS sent the following text message to (419) 617-5095, the "community phone": "U got anything (money) for me?"

90. On August 25, 2013, at approximately 12:18 p.m., Juvenile #1 called DANNI CHILDERS on the telephone. Following greetings, CHILDERS asked, "You got anything (money) for me over there?" Juvenile #1 replied, "Hell nah, this shit (drug sales) moving slow as hell over here DANNI."

91. On August 25, 2013, at approximately 4:51 p.m., Source 7 sent the following text message to ALLEN GRAVES: "shit got anny hardware (crack cocaine) bub?" At 4:52 p.m., ALLEN GRAVES replied with the following text message to Source 7: "Yes."

92. On August 25, 2013, at approximately 4:54 p.m., ALLEN GRAVES called Juvenile #1 on the telephone. During their conversation, ALLEN GRAVES asked, "Yeah, you got some hardware (crack cocaine) right?" Juvenile #1 replied, "Yeah. Yeah." ALLEN GRAVES said, "Aight, (Source 7) on his way up over there dog." Juvenile #1 responded, "Alright." ALLEN GRAVES said, "Gotta pump this shit back up. . ." At approximately 4:57 p.m., ALLEN GRAVES sent the following text message to Source 7: "Go to m. (323 Mound Street)". At approximately 5:11 p.m., Source 7 arrived at 323 Mound Street and found no one home. At approximately 5:14 p.m., Source 7 sent the following text message to ALLEN GRAVES: "Bub just was there no1 answering wat up u home?" At approximately 5:54 p.m., ALLEN GRAVES called Juvenile #1 on the telephone and said, "Damn, (Source 7) say he been knockin' at the door and shit dude." Juvenile #1 lied and replied, "Yeah, I just let him in." At approximately 6:00 p.m., Juvenile #1 was dropped off by Harry's Cab Service at 323 Mound Street. Source 7 and Juvenile #1 walked inside the back door of 323 Mound Street. Juvenile #1 advised he only had soft/wet (cocaine base ("crack")) left and did not want to sell a product that wasn't any good.

93. On August 25, 2013, at approximately 6:08 p.m., Juvenile #1 called BRITTANY PAYNE on the telephone. During the conversation, Juvenile #1 asked PAYNE, "Hey, you got some hard (crack cocaine)?" PAYNE replied, "Yeah." Juvenile #1 advised, "'Cause I got somebody (Source 7) wants some, wants something real quick. . . I need um, 2 grams (2 grams

of cocaine base ("crack")) real quick." PAYNE replied, "Two dubs (two \$20 amounts of cocaine base ("crack"))?"

94. On August 25, 2013, at approximately 6:10 p.m., Juvenile #1 called BRITTANY PAYNE on the telephone. Juvenile # 1 asked, "Like what do you have?" PAYNE replied, "Only a 50 (\$50 worth of cocaine base ("crack")) left." Juvenile # 1 asked, "That's it?" PAYNE replied, "Yeah left, I have to get some more. I have to sell this and get some more." Juvenile # 1 asked, "That's all you got?" PAYNE replied, "Yeah, before I said I had to sell this and go get some more real fast." Juvenile #1 said, "Oh, I was tryin' to get like, a, uh, a lil' ball (3.5 grams of cocaine base ("crack")) or something." PAYNE asked, "You wanted a ball?" Juvenile #1 replied, "Mmm hmmm, I got somebody (Source 7) that wants some here. I got somebody that wants two grams. You can get two grams? PAYNE replied, "Yeah, I can probably call and get some." At approximately 6:13 p.m., Juvenile #1 called PAYNE again. During their conversation, PAYNE said, "I can't get it right now, their (PAYNE's supplier) phone's dead." Juvenile #1 asked, "Where BG?" PAYNE replied, "BG over there, but she's probably can't get it either because we get it (cocaine base ("crack")) from the same people (suppliers) and their phone's dead so." Juvenile #1 asked, "Oh, they ain't got nothin'?" PAYNE responded, "Um, they have it, but their phones dead so going to have to wait 'til they plug their shit back in." Juvenile #1 asked, "Where they? Where that at?" PAYNE replied, "I don't know where they're at! They usually just come to me. I don't know where they stay at." At approximately 6:17 p.m., Source 7 and Juvenile #1 arrived at the rear of PAYNE's residence located at 450 Oak Street, in Marion, Ohio, and entered the residence. Juvenile #1 told Source 7 to stay in the kitchen while he walked into the living room and met with PAYNE. When Juvenile #1 returned to the kitchen, he told Source 7, "Got a 50 and a 20 left (\$70 worth of cocaine base ("crack"))."

Juvenile #1 then sold Source 7 approximately .6 grams of crack cocaine for \$70. Before leaving, Juvenile #1 walked out of the kitchen once again and met with PAYNE.

95. On August 26, 2013, at approximately 12:46 a.m., BRITTANY PAYNE called Juvenile #1 on the telephone. PAYNE asked, "What do you want?" Juvenile #1 replied, "Ah, bring me a uh, 50 (\$50 worth of crack cocaine)." PAYNE replied, "Aight, I'm coming."

96. On August 26, 2013, at approximately 7:43 p.m., Juvenile #1 called ALLEN GRAVES on the telephone. During their conversation, Juvenile #1 asked, "Hey are you right there by B (JERONNE WHITE)?" ALLEN GRAVES asked, "Yeah, why what's up?" Juvenile #1 said, "Ask that n\*\*\*a where he put them Vs (Vicodin pills) at." ALLEN GRAVES asked WHITE, "Hey yo, where you put them 750s (Vicodin pills marked 750) at?" ALLEN GRAVES then advised Juvenile #1, "On the side of the couch."

97. On August 27, 2013, at approximately 12:20 p.m., ALLEN GRAVES called Juvenile #1 on the telephone. During their conversation, ALLEN GRAVES asked, "Hey, y'all ain't got that back door (to 323 Mound Street) open do y'all?" Juvenile #1 replied, "No. We don't got that back door open. Why you say that?" ALLEN GRAVES responded, "I don't know. We sittin' here listening on the (police) scanner, cause they said somethin' on Mound. . . They (police) going over on Mound or some shit." Juvenile #1 stated, "That's what I'm sayin'. Our back door ain't open." ALLEN GRAVES replied, "Ok, keep it closed. Just in case."

98. On August 27, 2013, at approximately 1:13 p.m., Juvenile #1 called ALLEN GRAVES on the telephone. During their conversation, Juvenile #1 said, "Hey, T (TERRANCE LOMBARD) just called lookin' for you n\*\*\*a." ALLEN GRAVES asked, "Where you tell him I was gone? Did he ask where I was at?" Juvenile #1 replied, "I told him you was uh, wit' your n\*\*\*a." ALLEN GRAVES asked, "Did you tell him where I went?" Juvenile #1 replied, "Yeah.

. . He said man that, he's like man that n\*\*\*a supposed to see me last night man." ALLEN GRAVES laughed and replied, "Who business is, you know what I'm sayin'? Why mother f\*\*\*ers tell (UI) tell other mother f\*\*\*ers' business regardless, you know what I'm sayin'?"

99. On August 27, 2013, at approximately 3:25 p.m., JERONNE WHITE called DANNI CHILDERS and CHRISTOPHER PRINCE on the telephone. Following greetings, WHITE asked, "Hey, DANNI, you at home (207 Neil Avenue, Marion, Ohio 43302)?" CHILDERS replied, "Yeah." WHITE asked, "Let me talk to Chris (CHRISTOPHER PRINCE) right quick. . . Because he know where the um, the stuff (drugs) at, that's why I'm, he hid the stuff, I can't find it." CHILDERS said, ". . . You know they got a video on uh, Facebook from them, they did them drug raids today. They got 33 different people." WHITE replied, "Well, we ain't tryin' to be one of them either." CHILDERS said, "Right." CHILDERS then spoke to CHRISTOPHER PRINCE in the background and said, "Chris, BURGER (WHITE) needs to know where the stuff's at." PRINCE and WHITE then engaged in conversation. WHITE asked, "Yeah bro, where the stuff at? I went by the wall in the front room." PRINCE advised, "It's in garbage bro. . . I said the garbage bag in the green box. . . Yeah, the black garbage bag, the first one bro." WHITE asked, "The one by the front room right?" PRINCE confirmed, "Mmm hmm. In the kitchen."

100. On August 27, 2013, at approximately 3:37 p.m., JERONNE WHITE and ALLEN GRAVES called Juvenile #1 on the telephone. During the conversation, ALLEN GRAVES asked, "Dog, we got all these mother f\*\*\*ers (drug customers) over here wantin' some hard (cocaine base ("crack")) n\*\*\*a. Where, where, where's it at? Tell BURGER (JERONNE WHITE) where it's at so he can got get it." Juvenile #1 said, "Alright." WHITE then got on the phone and Juvenile # 1 said, "Bro, you know under, by the stairs bro?" WHITE asked, "By the



steps, yeah?" Juvenile #1 said, "Like, right there B, you don't hardly know what I'm talkin' 'bout bro." WHITE replied, "I'm goin' upstairs n\*\*\*a." Juvenile # 1 said, "Yeah, it's under the carpet bro."

101. On August 27, 2013 at approximately 3:58 p.m., ABBEE HEINE called JERONNE WHITE on the telephone. During their conversation, HEINE advised, "Thirty-three mother f\*\*\*ers got raided and got arrested and I know like ten of 'em of the thirty-three that got busted. Like y'all, y'all n\*\*\*\*s need to be careful as f\*\*\*. The SWAT's in town and everything. Like, they is not playin' . . . For real, and that house (438 1/2 North Prospect Street, Marion, Ohio, was leased under HEINE's name) is in my name. I want it out of my name. Like, I'm serious as f\*\*\*." WHITE replied, "We not over there no more." HEINE asked, "Y'all moved?" WHITE replied, "Yeah, you can go over there and check n\*\*\*a. We moved. We ain't over there no more." HEINE stated, "I know 'cause that house was gettin' hot. I ain't about to lie." WHITE replied, "We already know. Think we don't know that?" HEINE responded, ". . . remember how my mom was callin' me and telling me everything on Prospect Street? . . . And how I was like mom how did you? My uncle, my uncle he works for the city so he talks to MARMET (Marion Metro Drug Task Force). BURGER, Prospect was about to get raided. The day that we moved, they was fittin' to raid it. Like, remember that house that we said, on the corner, that we said that we thought cameras was in? They had cameras in that house. They had MARMET walkin' up and down the alley at us. Like, we was hot as f\*\*\* on Prospect Street." WHITE replied, "We know that. We know every move they make n\*\*\*a." HEINE stated, "I know. I was all scared like, oh my God. I don't want my n\*\*\*\*s to get raided." WHITE advised, "No we good. We smarter than the mother f\*\*\*ers." HEINE replied, "I know, y'all, y'all always know when y'all about to get raided and you move."

102. On August 27, 2013, at approximately 5:53 p.m., JERONNE WHITE called DANNI CHILDERS on the telephone. WHITE said, "Hey come get this um, what's it name from me. Got some more of them um 7's (Vicodin pills marked "750")? . . . Come pick this package up from me and, and um do you got some more of them 7's?" CHILDERS asked, "Where you at?" WHITE advised, "At the new house (247 Senate Street)." CHILDERS stated, "Yeah, I'll be over there in a minute. . . Hey, I'm gonna need to pack of some of them packs (heroin) up tonight." WHITE replied, "Huh?" CHILDERS repeated, "I said I'm gonna have to make up some of them packs up tonight." WHITE replied, "Yeah, but I wanna talk to you about that, we, we gotta probably do that about 12 o'clock tonight, you cool with that?" CHILDERS responded, "Yeah, that's what I mean, later on tonight." WHITE replied, "Alright." CHILDERS said, "Alright, I'll be over there in a minute."

103. On August 27, 2013, at approximately 10:01 p.m., DANNI CHILDERS called Juvenile #1 and JERONNE WHITE on the telephone. During the conversation, CHILDERS asked Juvenile #1, "Hey are you around BURGER (JERONNE WHITE)?" Juvenile #1 replied, "Yeah." CHILDERS replied, "Let me talk to him real quick." WHITE picked up the phone and CHILDERS asked, "When you coming?" WHITE replied, "About 11 o'clock." CHILDERS said, "Alright. Make sure you come because Eddie's (drug customer) comin' over here (207 Neil Avenue, Marion, Ohio) and he needs five packs (heroin) and a fifty of hard (cocaine base ("crack")) so make sure you bring it with you." WHITE replied, "Alright."

104. On August 27, 2013, at approximately 11:36 p.m., Juvenile #1 called BRITTANY PAYNE on the telephone. Juvenile # 1 asked, "Hey, you just got some hard (cocaine base ("crack"))?" PAYNE replied, "Um, no. I'm waitin' on uh, what's his name (supplier) to bring me some." Juvenile # 1 asked, "You say you don't got none?" PAYNE replied, "No. I'm, I'm

waitin', RUDY (ALLEN GRAVES) just called me too. I'm, I'm waitin' on what's his name to bring some. He said give him a minute cause its hot as f\*\*\* out (too much police presence). He said he's gonna bring it though." Juvenile # 1 asked, 'You said UNC (ALLEN GRAVES) just called you?" PAYNE replied, "Well UNC, um, yeah. UNC just called me too and asked me for some."

105. On August 28, 2013, at approximately 2:37 p.m., BRITTANY PAYNE called JERONNE WHITE on the telephone. During their conversation, PAYNE asked, "Hey, you guys have work (cocaine base ("crack")) over there?" WHITE replied, "Huh?" PAYNE repeated, "You guys work over there?" WHITE replied, "No we don't, why?" PAYNE said, "Because I have some. RUDY (ALLEN GRAVES) has been coming to me to get some." WHITE replied, "If he (ALLEN GRAVES) comin' to you that means we don't got none dumbass."

106. On August 28, 2013, at approximately 3:55 p.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES asked, "Where P (Juvenile #1) at? . . . Dog, that n\*\*\*a, and that n\*\*\*a ain't got no hard (cocaine base ("crack")) do he?" WHITE replied, "Nope." ALLEN GRAVES stated, "Yeah, I kinda figured that." WHITE advised, "You shouldn't have left his ass (in Detroit)." ALLEN GRAVES asked, "People (customers) have been calling for it too haven't they?" WHITE replied, "Yep." ALLEN GRAVES said, "Alright n\*\*\*a, I got a couple for you. I got a six (grams of cocaine base ("crack")) for you when I get there. . . Alright, so I'll be there in about an hour and a half."

107. On August 28, 2013, at approximately 10:28 p.m., STEVEN LESTER called CHRISTOPHER PRINCE on the telephone. LESTER asked, "Hey, this is Steve. Uh, you guys got 14 of those Vs (Vicodin) left?" PRINCE replied, "Nope."

108. On August 29, 2013, at approximately 11:20 a.m., DANNI CHILDERS called Juvenile #1 on the telephone. Following greetings, CHILDERS asked, "Hey um, do you guys got any of those 30s (Percocet 30 mg pills) over there?" Juvenile #1 replied, "Huh? Nope." CHILDERS asked again, "Do you guys got any 30s over there?" Juvenile #1 advised, "Oh, nah." CHILDERS said, "Ah, I know somebody (drug customer) that was lookin' for like 30 of 'em, but alright."

109. On August 29, 2013, at approximately 11:58 a.m., ALLEN GRAVES called Juvenile #1 on the telephone. During their conversation, ALLEN GRAVES said, "I'm fittin' to shoot them to you. Did you, hey, hey, . . . did you, did you um, get em', get rid of them three (3 grams of cocaine base ("crack")) I gave you?" Juvenile #1 replied, "Hell yeah, they (customers) said them bitches fire. . . They said them bitches fire (good quality). They love it too and they like damn, by the time y'all n\*\*\*\*s fatten them bitches up, them bitches fire." ALLEN GRAVES then asked, "And they, they like the shit some goods too, huh?" Juvenile #1 replied, "Hell yeah n\*\*\*\*a and they talkin' 'bout the quantity, how fat it is and shit." ALLEN GRAVES said, "I'm fittin' to um, shoot you um, six (grams of crack) n\*\*\*\*a. You got it Pimp, man and to shorten your bill dog, you gotta give me the whole six back dog."

110. On August 29, 2013, at approximately 2:36 p.m., CHRISTOPHER PRINCE called ALLEN GRAVES on the telephone. During their conversation, ALLEN GRAVES said, "Call that n\*\*\*\*a, call that, call Brittany phone right now dog and tell Pimp (Juvenile #1) to get his ass to the house right now dog or I'm taking my shit (drugs) back right now." PRINCE replied, "Alright."

111. On August 29, 2013, at approximately 7:11 p.m., Juvenile #1 called TERRANCE LOMBARD on the telephone. During their conversation, LOMBARD asked, "I was tryin' to

see, did you talk to UNC (ALLEN GRAVES)?" Juvenile #1 replied, "Yeah, I talked to that n\*\*\*a." LOMBARD asked, "What the f\*\*\* going on with that guy man? Talkin' 'bout he in Indiana and all that shit." Juvenile #1 asked, "That's what he told you?" LOMBARD replied, "Yeah." Juvenile #1 stated, "Hell nah. Don't get me wrong. That's where he fittin' to go though, right now. But yeah, that's where he fittin' to go today. He fittin' to ride down there he told me. But, shit. But shit, I don't know what's wrong with that n\*\*\*a. He might just don't got the um, the clothes (money), you know? He might have just f\*\*\*ed around and f\*\*\*ed that shit up. He just tryin' to get back on it or somethin', you know what I'm sayin'?" LOMBARD replied, "Mmm hmm. Aight."

112. On August 30, 2013, at approximately 6:32 p.m., Source 7 called ALLEN GRAVES on the telephone. Source 7 asked ALLEN GRAVES if he had any "hardware" (crack cocaine). ALLEN GRAVES instructed Source 7 to call the "trap phone" ((419) 617-5095). At approximately 6:35 p.m., Source 7 called (419) 617-5095 and spoke to Juvenile #1. Source 7 asked if Juvenile #1 had a "ball" (3.5 grams of cocaine base ("crack")). Juvenile #1 replied he did. At approximately 6:59 p.m., Source 7 met with Juvenile #1 and CHRISTOPHER PRINCE in the kitchen of 323 Mound Street, Marion, Ohio, and purchased approximately 1.5 grams of cocaine base ("crack") for \$250.

113. On August 31, 2013, at approximately 12:34 a.m., DANNI CHILDERS and MARTEZ MONTGOMERY called CHRISTOPHER PRINCE on the telephone. During the three-way conversation, CHILDERS told PRINCE, "TEZ (MONTGOMERY) told me to tell you to give him them, um, give him that six (6 grams of cocaine base ("crack")) that you have over there of UNC's (ALLEN GRAVES)." PRINCE asked, "That's what he said?" CHILDERS replied, "Yeah." PRINCE asked, "Why he say that?" MONTGOMERY said to CHILDERS,

“Ask him did UNC give him six.” CHILDERS repeated to PRINCE, “Did UNC give you a six, right?” PRINCE replied, “He gave all them six, he supposed to bring me one tomorrow.”

CHILDERS asked, “You say you ain’t never get one?” PRINCE replied, “No, I had gave the mother f\*\*\*, I had got a, uh, a 3, a 3-5 (3.5 grams of cocaine base (“crack”)), but I sold that. He (ALLEN GRAVES), he gave all them (the other dealers in the distribution house) one (six gram amount of cocaine base (“crack”)) today. Supposed, said he supposed to bring more tomorrow. He said he don’t know.”

114. On August 31, 2013, at approximately 10:02 p.m., Juvenile #1 called ALLEN GRAVES on the telephone. During their conversation, Juvenile #1 asked, “Hey how much, how much is that uh half (half ounce of cocaine base (“crack”))?” ALLEN GRAVES replied, “Um, seven fifty (\$750).” Juvenile #1 asked, “Seven fifty?” ALLEN GRAVES responded, “Yep.” Juvenile #1 then asked, “That’s how much you charging me?” ALLEN GRAVES replied, “No that’s what I’m charging him (the customer).”

115. On August 31, 2013, at approximately 10:03 p.m., Juvenile #1 called DARRELL JACOBS on the telephone. During their conversation, Juvenile #1 said, “Give me, give me, go ahead, come on and give me \$750 (for a half ounce of cocaine base (“crack”)), f\*\*\* it.” JACOBS replied, “Man Pimp, f\*\*\*ing 50, 750 for a f\*\*\*in’ half, that’s \$1,500 a f\*\*\*in’ ounce!” Juvenile # 1 replied, “Hell yeah, how much you think it go for?” Approximately seven minutes later at 10:10 p.m., JACOBS called Juvenile #1 again. During the second conversation, Juvenile # 1 asked, “Hey, you want it hard (cocaine base (“crack”)) or soft (powder cocaine) dude?” JACOBS replied, “Mother f\*\*\*er, he (drug customer) want it f\*\*\*in’ soft so he can cook it up (into cocaine base (“crack”)) his self.” Juvenile # 1 replied, “Aight, if he want it, look, if he want it soft bro, the I want \$800 flat.”

116. On September 1, 2013, at approximately 12:21 a.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES asked, 'Hey, what ever happened with my man TODD (DARRELL JACOBS)?' He was bullshittin' wasn't he (JACOBS did not purchase the half ounce of cocaine)?" WHITE replied, "Yeah." ALLEN GRAVES asked, "How's everything over there (the drug distribution house)?" WHITE replied, "Straight." ALLEN GRAVES then asked, "Moving like it's supposed to move?" WHITE replied, "Yeah."

117. On September 1, 2013, at approximately 12:43 p.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES asked, "How's it doing? That shit (drug sales) tryin' to pick up?" WHITE replied, "Yeah. Tryin' to a little." ALLEN GRAVES asked, "Do you think by Friday, n\*\*\*a, we can do like five bands (\$5,000)?" WHITE replied, "We should." ALLEN GRAVES stated, "Alright. That's what I'm talkin' about. I gotta give my man (supplier) about five, six bands (\$5,000-6,000), you know?"

118. On September 1, 2013, at approximately 1:16 p.m., DANNI CHILDERS called JERONNE WHITE on the telephone. CHILDERS asked, "Did that guy (drug customer) ever come over last night?" WHITE replied, "Yeah, I know him." CHILDERS asked, "Did he buy anything or did he get a, just get that one free pack (heroin)?" WHITE replied, "He got the free pack (heroin) and he got uh, and he got some hardware (cocaine base ("crack")) free."

119. On September 1, 2013, at approximately 8:41 p.m., CHRISTOPHER PRINCE called JERONNE WHITE on the telephone. PRINCE said, "DANNI (CHILDERS) took the gun." WHITE said, "Said I thought, they thought it (the gun) was over at ALLEN's (GRAVES)." PRINCE replied, "Alright, who said that? Paris?" WHITE replied, "Yeah." PRINCE said, "Alright, it's in her room."

120. On September 2, 2013, at approximately 1:25 a.m., ALLEN GRAVES called Juvenile #1 on the telephone. During their conversation, the two discussed N.B. (a person known to the grand jury, but not indicted herein) going to jail. ALLEN GRAVES said, "Mother f\*\*\*er (N.B.) took my .38 (gun) dog and my, in my, in my safe and shit. My ID and my .38 was in that bitch." Juvenile #1 replied, "Yeah."

121. On September 3, 2013, at approximately 11:02 a.m., Juvenile #1 called ALLEN GRAVES on the telephone. During their conversation, Juvenile #1 said, "Shit, I need um, some hard (cocaine base ("crack"))." ALLEN GRAVES asked, "You still finish the other one, the package?" Juvenile #1 replied, "Nah, I ain't finished them yet." ALLEN GRAVES stated, "Alright, don't mess with this though, I got it all hooked up so don't touch 'em. Leave 'em just like I got 'em dog." Juvenile #1 said, "Alright."

122. On September 4, 2013, at approximately 4:39 p.m., BRITTANY PAYNE called JERONNE WHITE on the telephone. During their conversation, PAYNE said, "I told you I have to pay this f\*\*\*in' \$120 in the morning for this f\*\*\*in' thing, or I'm gonna have a warrant out for my arrest. My Probation Officer said. And alls I have, alls I have is some hard (cocaine base ("crack")) and I have to get some of this off (sell some of the cocaine base ("crack")) to make money) and nobody's comin" (no customers are coming). . . So I asked you if you could sell some of it (cocaine base ("crack")) for me so I could pay this shit in the morning." WHITE replied, "Yeah. I'm gonna try, uh, I'll be down, be down there. You at the house?" PAYNE replied, "No, I'm 'bout to be in a minute. Just call me."

123. On September 5, 2013, at approximately 5:19 p.m., ALLEN GRAVES called CHRISTOPHER PRINCE and JERONNE WHITE on the telephone. During their conversation, PRINCE told ALLEN GRAVES, "T (MARTEZ MONTGOMERY) said answer the phone you



feel me? DANNI (CHILDERS) got TEZ (MARTEZ MONTGOMERY) on the phone talkin' about BURGER (JERONNE WHITE), did you go to the city (Detroit, Michigan)? BURGER like 'I ain't go to no city, what you talkin' about?' . . ." WHITE then got on the phone and told ALLEN GRAVES, "Yeah, he (MONTGOMERY) said if you don't answer your phone, then you can come take your shit out the house." ALLEN GRAVES replied, "N\*\*\*a, that is my f\*\*\*ing house!"

124. On September 5, 2013, at approximately 5:29 p.m., MARTEZ MONTGOMERY called JERONNE WHITE on the telephone. During their lengthy conversation complaining about ALLEN GRAVES, MONTGOMERY said, "I'm fittin' to cuss his (ALLEN GRAVES) hoe ass the f\*\*\* out. He's not putting shit over at my house. I'm telling you now, once I get through to this hoe ass n\*\*\*a, if this n\*\*\*a don't give me my shit (money), I don't give a f\*\*\* what nobody say bro, do not get another (drug supply), take shit from him. If you take some shit (drug supply) from him (ALLEN GRAVES), literally dog, I swear to God, I'm takin' my phones (the community drug distribution phones) bro. On everything, 'cause both the phones is mine. So what he bought a phone, but that my business on that mother f\*\*\*er. . . ." WHITE replied, "Well yeah bro, I been trying to get your girl (DANNI CHILDERS) shit first bro. But, the shit (drugs) she got in that UNC (ALLEN GRAVES) gave her, that shit (drug supply) was garbage (poor quality) bro. Yeah, that shit for a whole f\*\*\*in' month, that shit wasn't pumpin' (drug sales were poor). Even the hard (cocaine base ("crack")) wasn't pumpin' like that bro." MONTGOMERY asked, "That shit (drug supply) y'all got right now garbage? That shit y'all got now garbage?" WHITE replied, "Nah. It's like your girl (CHILDERS), her shit (drug supply) not garbage now, this shit movin' (selling) a little now. It didn't start pickin' up in two days bro."

125. On September 6, 2013, at approximately 1:48 a.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During their conversation, ALLEN GRAVES asked, "Still slow as f\*\*\*?" WHITE replied, "Hell yeah." ALLEN GRAVES said, "Hey dog, y'all don't be leavin' Pimp (Juvenile #1) by hisself no more dog at night." WHITE replied, "I got you." ALLEN GRAVES then asked, ". . . Man, damn dog, it (drug sales) movin' that f\*\*\*n' slow dog?" WHITE replied, "Yeah. You gotta think, mother f\*\*\*ers ain't got no money. . . Friday, tomorrow should be good. Mother f\*\*\*ers get they checks, work checks." ALLEN GRAVES stated, "Sure f\*\*\*in' hope so. I need to come up real quick."

126. On September 6, 2013, at approximately 8:51 p.m., ALLEN GRAVES called CHRISTOPHER PRINCE on the telephone. ALLEN GRAVES said, "Thomas (drug customer) on his way over there (the drug distribution house). Give him a sample. . ." PRINCE asked, "Give him a sample of what?" ALLEN GRAVES replied, "Of the hard (cocaine base ("crack"))."

127. On September 7, 2013, at approximately 2:41 p.m., STEVEN LESTER called JERONNE WHITE on the telephone. LESTER said, "Hey, this is Steve, I'm heading your way. I need, uh, like 29 of those Vs (Vicodin pills) and 7 bars (Xanax pills)." WHITE replied, "Yeah, come on." LESTER said, "Ok, I'm on my way right now."

128. On September 7, 2013, at approximately 5:26 p.m., CHRISTOPHER PRINCE called ALLEN GRAVES on the telephone. PRINCE said, "What's his name (MARTEZ MONTGOMERY) just called going off." ALLEN GRAVES asked, "Who?" PRINCE replied, "T (MONTGOMERY)." ALLEN GRAVES asked, "For what?" PRINCE replied, "Oh, he said tell you (UI), he talkin' 'bout tell UNC (ALLEN GRAVES) come get his shit, his shit out of the house. Get everything that he got, all this shit, you feel me? He said he want his money by the

end of the day.” ALLEN GRAVES asked, “What?” PRINCE said, “BURGER (JERONNE WHITE) will tell ya, hold on, hold on. He said, he said, he said tell UNC have his money by the end of the day and you on some fag shit. You a bitch-ass n\*\*\*a. He’ll kill you. He sayin’, talkin’ about come get all your shit out this house if you don’t got his money by the end of the day. He said come get your shit, or else.” ALLEN GRAVES replied, “N\*\*\*a, n\*\*\*a, that n\*\*\*a better get the f\*\*\* on. I don’t wanna have his shit in my house! That’s my house! That’s my people shit (drugs). Think he run this (UI), I won’t let her (DANNI CHILDERS) bring shit over here.”

129. On September 7, 2013, at approximately 5:30 p.m., MARTEZ MONTGOMERY, in a three-way call from prison, spoke to JERONNE WHITE. During their conversation, WHITE said, “Whatever you tell that n\*\*\*a (ALLEN GRAVES), that n\*\*\*a ain’t paying no attention to you bro. He just, that n\*\*\*a doin’ him.” MONTGOMERY stated, “He think I’m bullshittin’. I’m gonna show his ass bitch. You don’t make shit bitch. I made you. I’m fittin’ to destroy your bitch ass. I’m fittin’, you got, you got Bud (L.T., Jr.) number?” WHITE replied, “Nope.” MONTGOMERY advised, “I’mma say, you better tell Bud to get his shit (drug supply) back ‘cause the boys, they comin’. I swear to God. F\*\*\* you mean? I’m fittin’ to tell him that he got that thing in his house, I’m not playin’. I swear to God. He making me go that way dog. . . He thinkin’ he’s fittin’ to get my phones (the community drug distribution phones) and all that shit. He got life f\*\*\*ed up n\*\*\*a. That’s all my shit. That’s all my business bro. . .” MONTGOMERY then asked WHITE, “He got that thing (drug supply) at his house?” WHITE replied, “Yep.” MONTGOMERY asked, “You know where it’s at?” WHITE replied, “It’s in the cabinet. In the kitchen, in the cabinet.” MONTGOMERY asked, “The whole thing?”

WHITE replied, "Yep." MONTGOMERY stated, "Alright, don't say shit bro, but I swear to God bro. I'm givin' that n\*\*\*a four days bro. . ."

130. On September 7, 2013, at approximately 10:07 p.m., STEVEN LESTER called CHRISTOPHER PRINCE on the telephone. LESTER said, "Hey, it's Steve. Ah, you still good with those Vs (Vicodin)?" PRINCE said, "Yeah." LESTER said, "Ok, I need eight of 'em. I'll be down there in about 20, 25 minutes." PRINCE said, "You know how much they is don't you? They ain't five (\$5 each)." LESTER said, "Huh?" PRINCE replied, "You know they six (\$6 each)." LESTER said, "Oh man." PRINCE replied, "Come on now Steve." LESTER said, "That's what I been tellin' her (drug customer), that's what they been sellin' to me for." PRINCE said, "Alright man, this one time man." LESTER said, "Alright, I'll be there in a few."

131. On September 7, 2013, at approximately 10:55 p.m., CHRISTOPHER PRINCE called ALLEN GRAVES on the telephone. PRINCE asked, "You think uh, that bitch Brittany (drug customer) cool? . . . Remember that bitch that used to buy then, them 3s (Percocet 30 mg pills)?" ALLEN GRAVES asked, "Yeah, what about her?" PRINCE asked, "Is she cool (not the police)?" ALLEN GRAVES replied, "Yeah, she cool as f\*\*\*, but you ain't seen her in a while, so search her (to see if she's wearing a wire). . . You ain't seen her in a while, search her ass." PRINCE said, "I gave her a dub (an amount of crack cocaine) and then she just called back. She was like can I get this dub."

132. On September 16, 2013, at approximately 3:31 p.m., DANNI CHILDERS called ALLEN GRAVES on the telephone. During the call, CHILDERS said, "Uh, you um, fat girl (drug customer) wanted to know if you uh, sold balls (3.5 gram quantities of cocaine base ("crack"))?" GRAVES replied, "Huh?" CHILDERS stated, "(UI) wanted to know if you, if you would sell her a ball?" GRAVES said, "I'mma come holla at you."

133. On September 16, 2013, at approximately 6:07 p.m., DARRYL MCFADDEN called ALLEN GRAVES on the telephone. During the call, MCFADDEN said, "Uh, 700 of them 500s (prescription pills) popped up. You wanted those right?" ALLEN GRAVES replied, "Of them 500s or 7-5s (Vicodin pills marked 750)?" MCFADDEN stated, "(UI) hundred Watsons (Watson 540 Hydrocodone pills)." ALLEN GRAVES asked, "What's he want for those, a dollar?" MCFADDEN replied, "That's what he said." ALLEN GRAVES said, "Ok, um . . . tomorrow?" MCFADDEN replied, "Ok, I'll tell him." ALLEN GRAVES said, "I'll take, I'll take 'em too."

134. On September 16, 2013, at approximately 7:42 p.m., ALLEN GRAVES called MARNIECE LOVE on the telephone. During the call, ALLEN GRAVES asked, "You see, you talk to T (TERRANCE LOMBARD)?" LOVE replied, "He doin' somethin'. I'm waitin' on him right now." ALLEN GRAVES replied, "Alright." LOVE said, "I'm waitin' to meet up with him, he gonna call me when he done, so we can meet up." At approximately 9:21 p.m., LOVE called ALLEN GRAVES back and asked, "Hey, you around DANNI (CHILDERS)?" ALLEN GRAVES replied, "Nope." LOVE said, "Call that n\*\*\*a (CHILDERS) back. I'm on the freight (Greyhound bus). My shit left (Detroit) at 9:15, its pullin' out. That n\*\*\*a still on the same shit." ALLEN GRAVES replied, "Don't even worry 'bout it." LOVE said, "Alright, I, hey, I'll be there (in Marion, Ohio) at 12 man."

135. On September 17, 2013, at approximately 1:01 p.m., ALLEN GRAVES called DARRYL MCFADDEN on the telephone. During the call, ALLEN GRAVES asked, "Hey, can you, you still got them Ritalins (Ritalin is a prescription pill that contains methylphenidate and is used to treat Attention Deficit Hyperactivity Disorder)?" MCFADDEN replied, "Yeah." ALLEN GRAVES asked, "How many you got?" MCFADDEN replied, "Um, shit, I got a lot of

'em. I got 'em over here now." ALLEN GRAVES asked, "Which, how many you got? I mean, which ones do you got, the peach ones?" MCFADDEN said, "The Ritalin? I got all milligrams, 10s, 20s, 30s, 40s and 50s." ALLEN GRAVES asked, "10s, 20s, 30s, 40s, and 50s?"

MCFADDEN replied, "Yeah." ALLEN GRAVES said, "Now, I don't want the capsules."

MCFADDEN replied, "Tablets." ALLEN GRAVES said, "That's what I'm, I need to cancel them, the 30s, 40s, and 50s, I just want them 10s, I just want them 10s and them 20s."

MCFADDEN replied, "I got tablets."

136. On September 17, 2013, at approximately 2:02 p.m., ALLEN GRAVES called MARNIECE LOVE on the telephone. During the call, ALLEN GRAVES asked, "Let me ask you a question, whose are those (pills) you got?" LOVE replied, "DANNI's (CHILDERS)." ALLEN GRAVES asked, "Oh, you had got, you got them for her?" LOVE replied, "No, she had 'em (pills) in the city (Detroit). I just picked them up for her." ALLEN GRAVES asked, "Uh, you don't know nobody up there (Detroit) got none?" LOVE replied, "I can call around."

137. On September 17, 2013, at approximately 5:00 p.m., ALLEN GRAVES called DARRYL MCFADDEN on the telephone. During the call, ALLEN GRAVES asked, "So the 10s and 20s is tablets? How many 10s and 20s you got?" MCFADDEN replied, "Uh, a total I think 25 bottles." ALLEN GRAVES asked, "That's 2,500 (pills)?" MCFADDEN replied, "Yep."

138. On September 18, 2013, at approximately 1:25 p.m., W.C. (a person known to the grand jury, but not indicted herein) called ALLEN GRAVES on the telephone. During the conversation, W.C. asked, "You got any of those blue things (30 mg Percocet pills)?" ALLEN GRAVES replied, "There's some um, some, some other one around, like deuces (20 mg Percocet pills) and shit like that. 10s, 15s (10 mg and 15 mg Percocet pills)." W.C. said, "Oh, right on."

Um, is there any way I could grab like five of the deuces 'till Friday, when I do that (drive to Detroit) for ya?" ALLEN GRAVES replied, "Yeah."

139. On September 18, 2013, at approximately 1:29 p.m., ALLEN GRAVES called CHRISTOPHER PRINCE on the telephone. During the conversation, ALLEN GRAVES asked, "Hey, you got some deuces (Percocet 20 mg pills)?" PRINCE asked, "Some who, some 2-0s?" ALLEN GRAVES replied, "Yeah." PRINCE said, "Niece (MARNIECE LOVE) do, but she gone." PRINCE then asked Juvenile # 1 in the background, "Pimp, you got her stuff (drugs) bro?" PRINCE then stated to ALLEN GRAVES, "... She (MARNIECE LOVE) took her shit (supply of drugs)." PRINCE then said to Juvenile # 1 in the background, "Look in B (JERONNE WHITE) bag, see if he got some deuces." Juvenile # 1 said, "Yeah." PRINCE told ALLEN GRAVES, "He (WHITE) got some deuces." ALLEN GRAVES replied, "Alright. Hey, BC (W.C.) on his way over there. Give him five of 'em (five Percocet 20 mg pills)." PRINCE replied, "Alright."

140. On September 18, 2013, at approximately 1:32 p.m., ALLEN GRAVES called DANNI CHILDERS on the telephone. ALLEN GRAVES asked, "Hey, did you get Chris (CHRISTOPHER PRINCE) that? Get them blues (Percocet pills which are blue in color)? Get them for his Auntie?" CHILDERS asked, "You said what?" ALLEN GRAVES asked, "Did you give Chris (PRINCE) that to get them from his Auntie?" CHILDERS asked, "What do you mean, did I give him that?" ALLEN GRAVES replied, "The money?" CHILDERS responded, "Yeah."

141. On September 19, 2013, at approximately 11:41 p.m., ALLEN GRAVES called Juvenile #1 on the telephone. During the call, ALLEN GRAVES said, "Hey, I'm fittin' to send Fred (drug customer) over there (to the new drug distribution house on Senate Street)." Juvenile

#1 asked, "Fred?" ALLEN GRAVES stated, "Yeah. Do you, do you remember Fred, that BURGER (JERONNE WHITE) had talked that shit and scared and told him to get the f\*\*\* out of the truck and all that?" Juvenile #1 replied, "Uh huh." ALLEN GRAVES said, "Ok, I'm fittin' to send him over there, uh, he want a fish (\$50 worth of drugs)." Juvenile #1 replied, "Alright."

142. On September 20, 2013, at approximately 12:30 p.m., ALLEN GRAVES called DARRYL MCFADDEN on telephone. During the call, MCFADDEN said, "Yeah, somebody just called me and said they had um, 700 Vikes, 500 milligram (700 500 milligram Vicodin pills)." ALLEN GRAVES asked, "700 Vikes, 500 milligrams?" MCFADDEN said, "Yep, the Watsons." ALLEN GRAVES replied, "Man, I really don't be wantin' those, but I'll take 'em, like I said man, I don't pay no more than like .75 cents for them or a dollar (.75 cents or \$1 per pill)." Later in the conversation, ALLEN GRAVES asked, "He say he want what for them?" MCFADDEN replied, "A dollar." ALLEN GRAVES said, "Alright."

143. On September 20, 2013, at approximately 12:05 p.m., TERRANCE LOMBARD met with ALLEN GRAVES at 410 North State Street, Marion, Ohio. LOMBARD arrived at 410 North State Street driving a 2013 silver Dodge Ram pick-up bearing Michigan License Tag CEK7684. At approximately 12:31 p.m., JERONNE WHITE arrived at 410 North State Street as a passenger in a 2005 silver Mercury Grand Marquis bearing Ohio License Tag FTC1897. At approximately 12:47 p.m., ALLEN GRAVES called Juvenile #1 on the telephone. During their (ALLEN GRAVES and Juvenile #1) phone conversation, LOMBARD was having a conversation with WHITE in the background. WHITE stated, "That shit's too light." LOMBARD replied, "That's that shit, that's cut and all that shit." WHITE asked, "N\*\*\*a, all



that bricked up?” ALLEN GRAVES then stated, “You just want, you just want it to look, to get big.”

144. On September 20, 2013, at approximately 1:10 p.m., TERRANCE LOMBARD departed 410 North State Street driving his Dodge Ram pick-up. At approximately 1:19 p.m., LOMBARD arrived at DANNI CHILDERS’ residence located at 207 Neil Avenue, Marion, Ohio. At approximately 1:38 p.m., DANNI CHILDERS left her residence driving a 2002 maroon Cadillac Escalade bearing Ohio License Tag FXJ6976. At approximately 1:40 p.m., LOMBARD left CHILDERS’ residence driving his Dodge Ram pick-up. While in his vehicle, LOMBARD possessed \$1,590 in U.S. currency concealed within a floor storage compartment on the driver’s side of the vehicle.

145. On September 22, 2013, at approximately 1:05 p.m., W.C. and ALLEN GRAVES traveled from Marion, Ohio to Fort Wayne, Indiana, in GRAVES’ black 2007 Saab SUV bearing Ohio License Tag FXJ6097. While in Fort Wayne, ALLEN GRAVES and W.C. drove to the Headlines Hair Salon at 4164 South Clinton Street, Fort Wayne, Indiana, where at approximately 3:44 p.m., they parked next to a tan Toyota Sienna van bearing Indiana License Tag 650LBC operated by L.T., Jr. After parking next to the van for ten minutes, ALLEN GRAVES and W.C. left the area and returned to Marion, Ohio.

146. On September 22, 2013, at approximately 6:28 p.m., ALLEN GRAVES called DANIELLE SULLIVAN on the telephone. During their conversation, ALLEN GRAVES advised, “Yeah, they (Ohio Highway Patrol) got us pulled over on the expressway. Searching the damn car, tearin’ it up and shit.” Later, SULLIVAN asked, “Is there anything (are drugs in the car)?” ALLEN GRAVES replied, “I wasn’t, nah, nah, I wasn’t even drivin’ and none of that shit. . . .” Later, SULLIVAN asked, “Why are they searching the car?” ALLEN GRAVES

replied, "I don't know why they searching the f\*\*\*in' car. They pulled us over for a speeding ticket. . . He (W.C.) wasn't speedin' at all." SULLIVAN asked, "Where's he (W.C.) at?"

ALLEN GRAVES replied, "In the other police car." SULLIVAN stated, "You better hope that he don't say nothin'." ALLEN GRAVES replied, "Shut up. You're so f\*\*\*in' negative, you know that?"

147. On September 24, 2013, at approximately 7:33 p.m., DARRYL MCFADDEN called ALLEN GRAVES on telephone. During the call, GRAVES asked, "Hey, um, I'm, I'm gonna see you tomorrow." MCFADDEN replied, "Ok, we can work a deal too you know, 'cause I'm still holdin' it (the prescription pills), you know I got from my son." GRAVES replied, "Bet, that's what I'm sayin'. I'm gonna see you tomorrow. For sure, for sure."

148. On September 30, 2013, at approximately 9:20 p.m., Source 7 arrived at 410 North State Street, Marion, Ohio, and met DANIELLE SULLIVAN and ALLEN GRAVES in the kitchen of the residence. During the meeting, ALLEN GRAVES was holding a black semi-automatic handgun in his right hand. ALLEN GRAVES asked Source 7, "Where the f\*\*\* you been?" Source 7 replied, "Man, where the f\*\*\* you been? I ain't got a number to get ahold of your ass." ALLEN GRAVES stated, "Yeah, I got that bitch turned off." ALLEN GRAVES told Source 7 that he was calling the "trap" (drug distribution location) phone which he subsequently provided to Source 7 as 740-396-5730. ALLEN GRAVES also informed Source 7 that the new "trap" house was on Senate Street (247 Senate Street, Marion, Ohio). ALLEN GRAVES said, "I got them 3s (Percocet 30 mg pills), but I ain't got no hard (cocaine base ("crack")). They got some 3s over there." At approximately 9:22 p.m., ALLEN GRAVES placed a call to the "trap" house and told them that Source 7 was coming over.

149. On September 30, 2013, at approximately 9:33 p.m., Source 7 arrived at 247 Senate Street, Marion, Ohio, and met with CHRISTOPHER PRINCE who asked how many (pills) Source 7 wanted. Source 7 replied, "Six." PRINCE asked Source 7 if Source 7 knew how much? Source 7 replied, "180 (dollars)." Thereafter, PRINCE sold Source 7 six Percocet 30 mg pills for \$180.

150. On October 10, 2013, at approximately 9:25 a.m., ALLEN GRAVES dropped STEVEN LESTER off at the Greyhound Bus Station located at 1001 Howard Street, Detroit, Michigan. LESTER was carrying a tan/checkered backpack and a tan suitcase. At approximately 1:29 p.m., ALLEN GRAVES stopped at the Greyhound Bus Station located at 11471 State Route 613 West, Findlay, Ohio. At approximately 2:22 p.m., ALLEN GRAVES arrived at his residence located at 410 North State Street, Marion, Ohio. At approximately 3:38 p.m., ALLEN GRAVES arrived at the Greyhound Bus Station located at 137 South State Street Marion, Ohio, and picked up LESTER. At approximately 3:50 p.m., ALLEN GRAVES arrived at his residence at 410 North State Street, in Marion, Ohio. Both ALLEN GRAVES and LESTER exited ALLEN GRAVES' black Saab SUV and entered the residence through the back door. At approximately 4:01 p.m., ALLEN GRAVES and LESTER exited the residence through the back door. LESTER departed the area on foot as ALLEN GRAVES drove away in his black Saab SUV.

151. On October 10, 2013, at approximately 6:49 p.m., ALLEN GRAVES called MARCUS BENSON on the telephone. During the call, ALLEN GRAVES and BENSON discussed problems with GRAVES' "team" consisting of Juvenile #1, JERONNE WHITE, CHRISTOPHER PRINCE, JASON GRAVES, DECARLOS BATES, and others. At one point in the conversation, BENSON said, "Like I told cuz in front of you, I said dog, 'if you ain't

down there (in Marion, Ohio) hustlin' (selling drugs) man, come on home (to Detroit) man.' I said 'if you up there slingin' (selling drugs) in the ma'f\*\*\*in' trap (the drug distribution house) and the ma'f\*\*\*er get hit (raided by police), guess what happens, you going to jail like everybody else.' Like I said (UI), if you ma'f\*\*\*ers don't want to do it right man, what the f\*\*\*? If, if you don't, if they don't feel like they gettin' f\*\*\*in' paid right, do your own thing. Then you ain't got to worry about a ma'f\*\*\*er payin' you, you pay yourself." ALLEN GRAVES replied, "They can get the f\*\*\* on and do their shit somewhere else." Later, BENSON said, "Yeah, like I said, if you the ma'f\*\*\*in' Sergeant of the ma'f\*\*\*in' team, you, you just ain't strong, 'cause you take the ma'f\*\*\*in' soldier to run the ma'f\*\*\*in' team." ALLEN GRAVES replied, "The team, the team is strong as f\*\*\*. It's just they run their mouths like bitches. That's the only thing. If they could shut up for like five minutes and do what they supposed to do, they'd be alright."

152. On October 10, 2013, at approximately 8:43 p.m., ALLEN GRAVES called JERONNE WHITE on the telephone. During the call, ALLEN GRAVES told WHITE, "8:30" (meaning WHITE owed ALLEN GRAVES \$830 on his drug debt). WHITE was confused and did not understand the code and ALLEN GRAVES called back about one minute later. During the second call, ALLEN GRAVES said, "What you owe me n\*\*\*a." WHITE replied, "Oh, oh, alright, alright. . . Yeah, I was sayin', you call me f\*\*\*in' tellin' me the time n\*\*\*a, I was like." ALLEN GRAVES interrupted, "Yeah, that's, when you said I thought you caught on like, ok, you see that's not the right time." WHITE replied, "That's alright doe. How I owe you that much? . . . It's supposed to be 5:00 (\$500)." ALLEN GRAVES said, "Right." WHITE said, "Then, and \$28." ALLEN GRAVES added, "And, and, and 3:30 (\$330)."

153. On October 11, 2013, at approximately 8:01 p.m., ALLEN GRAVES called GREG BURKETT on the telephone. During the call, BURKETT said, "Yeah, hey, uh, where in the hell did you learn how to add?" ALLEN GRAVES asked, "What's you mean?" BURKETT replied, "Cause they (the ounces of cocaine base ("crack") BURKETT purchased) was like, uh, almost four (grams), four short on each one man." ALLEN GRAVES said, "Get the f\*\*\* out of here!" BURKETT replied, "I swear to God. I ain't bullshittin' you. It's like 24 (24 grams instead of an ounce which is 28 grams)." ALLEN GRAVES said, "Then if it's like that, then my batteries (in his digital scale) must be going dead." BURKETT responded, "Yeah. I told, I told, I told my girl, I said man he something had to had it in the wrong mode or something man, 'cause he, I know he don't do that." ALLEN GRAVES stated, "Yeah, yeah, I don't do that, you know me. You know I don't do that." BURKETT stated, "Yeah, they was like 24 (grams) something with the, with the bag and everything, so." ALLEN GRAVES stated, "My scale must, my battery must be going dead so I gotta grab a new battery." BURKETT responded, "Yeah. It was uh, it was uh, almost four (grams short) on each one." ALLEN GRAVES said, "Ok, just swing by tomorrow and pick it up."

154. On October 11, 2013, at approximately 10:16 p.m., TERRANCE LOMBARD called ALLEN GRAVES on the telephone. ALLEN GRAVES said, "What's good n\*\*\*a?" LOMBARD replied, "What up?" ALLEN GRAVES said, "Yeah, you know that I told you um, what I told you n\*\*\*a?" LOMBARD said, "Yeah." ALLEN GRAVES said, "Alright, shit, you know. Tomorrow, but you, that you know when I say tomorrow, you know what I mean by that right?" LOMBARD replied, "Yeah." ALLEN GRAVES said, "Alright." LOMBARD said, "Alright." ALLEN GRAVES replied, "I'll bring it and f\*\*\* wit you then." LOMBARD replied, "Alright."

155. On October 13, 2013, at approximately 3:42 p.m., ALLEN GRAVES called C.F. (a person known to the grand jury, not indicted herein) on the telephone. During the call, C.F. said, "Uh, looking for some boy (heroin)." ALLEN GRAVES asked, "Where you at now?" C.F. said, "I'm sittin' in your driveway." ALLEN GRAVES repeated, "You sittin' in my driveway?" C.F. said, "Yeah." ALLEN GRAVES replied, "I'll be, I'll be there, I'll be there in two seconds."

156. On October 14, 2013, at approximately 3:49 p.m., an unknown male, aka Westside, called ALLEN GRAVES on the telephone. During the call, ALLEN GRAVES said, "I just got back (to 247 Senate Street, Marion, Ohio) from being out of town. All these mother f\*\*\*ers (CHRISTOPHER PRINCE, JERONNE WHITE, and Juvenile # 1) gone." Westside asked, "Where the f\*\*\* everybody at?" ALLEN GRAVES replied, "I don't know. I just called and talkin' 'bout they on they're way. I'm fittin' to f\*\*\* these n\*\*\*\*s up. Dog, these n\*\*\*\*s need to get the f\*\*\* home (Detroit). Hey dog, you got some n\*\*\*\*s that wanna come down (to Marion, Ohio)?" Westside replied, "Uh, shit, probably so. You know I gotta put that little crew together. I mean I could let you holla at couple of n\*\*\*\*s and shit, yeah." ALLEN GRAVES said, "Find me a couple n\*\*\*\*s dog." Westside replied, "Alright, alright. You, um, shit n\*\*\*a, what you got for me n\*\*\*a?" ALLEN GRAVES replied, "Shit, gimme, gimme, um, um, like Wednesday dog and I'm gonna have everything (money) for you." Westside asked, "Alright then, you ain't even got a couple (money) today?" ALLEN GRAVES replied, "N\*\*\*a, I'm trying. . . I had to pay my man (L.T., Jr.) off 'cause his people (suppliers) was bugging him and shit. . . I had to empty my shit to get his n\*\*\*a, so you give me a couple days to move a couple of these (ounces of crack cocaine) and I'll have you straight."

157. On October 14, 2013, at approximately 5:07 p.m., ALLEN GRAVES called J.R. (a person known to the grand jury, but not indicted herein) on the telephone. During the call,

ALLEN GRAVES asked, "Which one (cocaine base ("crack") or heroin) you want?" J.R. asked, "Do you have both?" ALLEN GRAVES replied, "You want both? I give you both, don't matter. I give you 25-25 (\$25 of heroin and \$25 of cocaine base ("crack"))." J.R. repeated, "Do you have both, I said." ALLEN GRAVES replied, "Do you, that's, is that what you want, both?" J.R. said, "Yeah, yeah."

158. On October 14, 2013, at approximately 5:31 p.m., ALLEN GRAVES called GREG BURKETT on the telephone. During the call, BURKETT said, "Hey, what ya, what ya say baby?" ALLEN GRAVES replied, "Hey, what's going on? Hey, I'm waitin' on some (cocaine base ("crack")). I'm waitin' on my man (drug supplier) right now. So as soon as he pull in, I'm gonna hit you up (supply you) first." BURKETT replied, "Hey, I appreciate you brother. Give me a call." Later in the conversation, ALLEN GRAVES said, "You know, like I said, the batteries (in the electronic scale), them batteries f\*\*\*ed up on that bitch." BURKETT replied, "Yeah, I know how that is. Yeah, I, uh, I been there and done that man, I know how that is."

159. On October 15, 2013, at approximately 11:43 a.m., ALLEN GRAVES called C. E. (a person known to the grand jury, but not indicted herein) on the telephone. Following greetings, C. E. stated, "I had some things (prescription pills), but they gone now." ALLEN GRAVES asked, "Oh, you see how you be doin' me?" C. E. replied, "Look, I, I called you a couple times this morning." ALLEN GRAVES asked, "I was asleep like a mother f\*\*\*er, why you ain't call Red (N.G., a person known to the grand jury, but not indicted herein)?" C. E. responded, "I ain't got Red number stored in my phone." ALLEN GRAVES advised, "... Then you could of just took 'em right over there." C. E. stated, "I don't know. I ain't know if you was here or if you was there, I don't know." ALLEN GRAVES replied, "If I'm not there, if I don't

answer my phone just call Red, she know to get 'em for me. She already know that." C. E. advised, ". . . I was supposed to be gettin' some more anyway, uh probably before Friday, by the weekend. Later, C. E. said, ". . . You know them things be goin' like hot cakes. They went so quick, I didn't have time to call nobody. . . Man people be callin' me for them dang ol' things." ALLEN GRAVES responded, "F\*\*\* them!" C. E. stated, "Before I can even make a phone call they be gone." ALLEN GRAVES advised, "Well deal with me dog. It don't take me nuttin' but two hours to get there (Detroit) and give you the money and that's that. . . . From now on. Charisma, I want every last one of them boys. . . I'm not playin'. Every last one of 'em Charisma. . ."

160. On October 16, 2013, at approximately 2:31 p.m., ALLEN GRAVES called MARCUS BENSON on the telephone. During the call, BENSON said, "Hey, shit, it's some, it's some um, some um, Vs, 750s (Vicodin 750 pills), you know what I'm sayin' on the floor. But, uh, I won't be back in town. I'm leaving tonight to go out of town, ain't coming back 'til Sunday or Saturday night." ALLEN GRAVES asked, "Hmm. How many on the floor?" BENSON replied, "90, but you'll have to get 'em Friday night or Sunday morning, something like that if you want 'em. I'll keep 'em at my house, but I won't be here." ALLEN GRAVES said, "Shit, just leave 'em with momma." BENSON said, "Alright. You gonna send the cash up here n\*\*\*a?" ALLEN GRAVES said, "Yeah."

161. On October 16, 2013, at approximately 4:34 p.m., TERRENCE LOMBARD called ALLEN GRAVES on the telephone. During the call, ALLEN GRAVES said, "They said, they came up and told me you came (to Marion, Ohio) and deal (sell drugs to) DANNI (CHILDERS)." LOMBARD replied, "I ain't been up there man. What the f\*\*\*? I mean, why is everybody talkin' about what I'm doing?" ALLEN GRAVES asked, "Oh, so that's not you



with DANNI? . . . I said, that's not you?" LOMBARD replied, "Nah, hell nah." Later, ALLEN GRAVES said, "I'm gonna be up there (Detroit) to drop them dollars (money on his drug debt) off to you so. . . I said I'm gonna be up there to drop some dollars off to you, so, shit, make that shit happen." LOMBARD replied, "Yeah."

162. On October 17, 2013, at approximately 12:10 a.m., ALLEN GRAVES called an unknown male, aka Meech, on the telephone. During the call, ALLEN GRAVES asked, "Hey, you, hey, you know to give me two juices (two ounces of cocaine base ("crack"))?" Meech asked, "Uh, which way (cocaine base ("crack") or powder cocaine)?" ALLEN GRAVES replied, "Shit dog, . . . I rather go, it don't matter, either way, long as them mother f\*\*\*ers right (weigh the correct amount)." Meech said, "Call me when you get here (Detroit)." ALLEN GRAVES asked, "Alright. What's the, hey what's the ticket (price) on one (ounce) you know?" Meech replied, "I gotta to call and see." Later that day, at approximately 1:25 p.m., Meech called ALLEN GRAVES back and said, "Yeah, it's gonna be uh, 1150 (\$1,150 for cocaine base ("crack")) and 1250 (\$1,250 for powder)." ALLEN GRAVES replied, "God damn, damn!" Meech said, "You talkin' about damn man, I, I done heard higher (more expensive) then that." ALLEN GRAVES said, "N\*\*\*a, I've been, n\*\*\*a I've been, that's what I'm talkin' 'bout, I've been getting' them bitches (ounces of cocaine base ("crack")) for 9 (\$900)." Later, ALLEN GRAVES said, "Um, go on and um, set it up for the 11 and a half (\$1,150) for me. I'mma be there (Detroit) in about two hours, couple hours." Meech asked, "Which way though (cocaine base ("crack") or powder)?" ALLEN GRAVES replied, "The 11 and a half (\$1,150 for the cocaine base ("crack"))."

163. On October 17, 2013, at approximately 1:44 p.m., an unknown male, aka Meech, called ALLEN GRAVES on the telephone. Meech asked, "You ain't never tell me what's you

was tryin' to do." ALLEN GRAVES stated, "I want it the hard way, you said 1150 right (one ounce of cocaine base ("crack")) for \$1,150.)?" Meech responded, "Nah, I'm sayin' you ain't, you want just one (one ounce)?" ALLEN GRAVES responded, "Um, yeah, yeah cause my mans (other supplier) and them sayin' they gonna be good tomorrow. I just need something to hold me over for today." Meech responded, "Ok", and ALLEN GRAVES stated, "Alright."

164. On October 17, 2013, at approximately 7:36 p.m., an unknown male, aka Meech, called ALLEN GRAVES on the telephone. Meech stated, "Hey, pull around the corner, um, on my street, you ain't gotta go nowhere, I got it (the ounce of cocaine base ("crack")) on me right here." ALLEN GRAVES stated, "Alright, shit I'm waitin' on my food, right quick." Meech responded, "Alright."

165. On October 18, 2013, at approximately 7:24 p.m., ALLEN GRAVES called EDWARD HEARN on the telephone. During the call, ALLEN GRAVES asked, "Yeah, I'm back now (from Detroit). Shit, what the tag (price) on him though?" HEARN replied, "Shit, man, I'm about to sell a n\*\*\*a juice (an ounce of cocaine base ("crack")) right now. Shit, I gotta get 1050 (\$1,050 per ounce) bro, but shit." ALLEN GRAVES replied, "Shit, that ain't bad, that ain't bad." HEARN replied, "It's melt down (good quality), it's melt down, so call me, shit." ALLEN GRAVES replied, "Oh, for real? Alright then, I'll probably be back up (in Detroit) in the a.m."

166. On October 20, 2013, at approximately 7:37 p.m., ALLEN GRAVES called CHRISTOPHER PRINCE on the telephone. During the conversation, PRINCE stated, "N\*\*\*a (drug supplier) had two hundred 224s (Percocet 30 mg pills) on deck. I was tryin' to call you." ALLEN GRAVES asked, "They still on deck?" PRINCE replied, "I don't know, they prolly still

do. They tryin' to turn 16 (\$16 per pill) my n\*\*\*a." ALLEN GRAVES said, "See if they still on deck, let me know." PRINCE replied, "Alright."

167. On October 22, 2013, at approximately 7:10 p.m., MARCUS BENSON called ALLEN GRAVES on the telephone. During the conversation, BENSON said, "I say cuz, got 30s, 30s (Percocet 30 mg pills) for 17 (\$17 per pill)." ALLEN GRAVES replied, "Huh, no, I'm good on those."

168. On October 22, 2013, at approximately 9:40 p.m., ALLEN GRAVES called DANIELLE SULLIVAN on the telephone. During the conversation, SULLIVAN asked, "Ok, well, do you, do you want some 30s (Percocet 30 mg pills)?" ALLEN GRAVES replied, "Well, I'm just sayin', no. How many they got?" SULLIVAN replied, "They've (the suppliers) got 30, 30 threes (30 Percocet 30 mg pills) and 90 tens (90 Percocet 10 mg pills)." ALLEN GRAVES asked, "They got what?" SULLIVAN replied, "30 threes and 90 tens." ALLEN GRAVES asked, "He want what for the, for the threes? Eight dollars (\$800)?" SULLIVAN replied, "He wanted eight, he wanted 850, 850 (\$850) for all thirty of them and I said, I can't do that. The lowest they will go is seven (\$700). And he said, ok well, I don't know it's, there's like three third parties. Like it's my dude from the D that's callin' me, but he's in Detroit and the people are in Columbus, Ohio, that's got 'em. And they're about to come get me and take me to this house and I'm goin' in the back door and goin' out the front."

169. On October 24, 2013, at approximately 1:18 p.m., ALLEN GRAVES called MARCUS BENSON on the telephone. During the conversation, BENSON said, "Uh, shit, it's seventy-five 30s (75 Percocet 30 mg pills) for 16 (\$16 per pill)." ALLEN GRAVES replied, "Huh? . . . You said 15?" BENSON replied, "16 mother f\*\*\*er." ALLEN GRAVES said, "75, alright, let me call you right back."

170. On October 25, 2013, at approximately 3:43 p.m., ALLEN GRAVES called EDWARD HEARN on the telephone. HEARN said, "Hey, I had text you Al, it was gonna be a couple (it is going to be some time before HEARN can supply ALLEN GRAVES with cocaine base ("crack")). Where you at, in the city (Detroit) now?" ALLEN GRAVES replied, "Yeah, I'm about to pull in about an hour." HEARN asked, "Oh yeah, yep? By the time, yep. Hey, what you trying to do Al?" ALLEN GRAVES replied, "Just a little half boy (half ounce of crack), something to carry me over." HEARN replied, "Oh some, oh yeah, it's probably, by the time you there in an hour, probably one more hour I think. When I text you, my man (supplier) said a couple hours, so shit, just call me when you touch down (in Detroit), then I'll, I'll tell you what's going on, I'll let you know."

171. On October 26, 2013, at approximately 12:35 p.m., ALLEN GRAVES called EDWARD HEARN on the telephone. HEARN said, "Shit, it's (the cocaine base ("crack")) around." ALLEN GRAVES replied, "Alright, I'll see you in about a couple hours. I'm on my way (to Detroit) now."

172. On October 26, 2013, at approximately 4:20 p.m., ALLEN GRAVES and STEVEN LESTER arrived at 18231 Avon Avenue, Detroit, Michigan, in ALLEN GRAVES' black Saab SUV bearing Ohio License Tag FXJ6097.

173. On October 26, 2013, at approximately 4:53 p.m., EDWARD HEARN called ALLEN GRAVES on the telephone. ALLEN GRAVES asked, "What's good n\*\*\*a?" HEARN stated, "Hey, I'm outside. Are you past, are you past uh, Curtis (Curtis Street in Detroit, Michigan, south of 18231 Avon Avenue)?" ALLEN GRAVES responded, "Yeah. Here I go, nah, I'm not past Curtis. I'm right here off the corner. You'll see my cars in the driveway. Red Cadillac and the um, black Saab truck." HEARN asked, "I'm on Curtis and Avon. You said

who? Oh, I see it, oh you said.” ALLEN GRAVES stated, “I’m on Avon at Curtis dog. Avon and Curtis.” HEARN asked, “Avon and Curtis right?” ALLEN GRAVES confirmed, “Yeah.” HEARN stated, “I see the Caddy in the driveway. I’m outside. C’mon.” ALLEN GRAVES responded, “Alright. Alright.” Thereafter, ALLEN GRAVES met with HEARN through the window of the silver Chevrolet Impala HEARN was driving.

174. On October 26, 2013, at approximately 4:57 p.m., EDWARD HEARN called ALLEN GRAVES on the telephone. HEARN said, “Yeah, 24 (grams) on the nose n\*\*\*a. What, what’s, what’s wrong now?” ALLEN GRAVES asked, “Who?” HEARN said, “I said it’s 24, what’s wrong now?” ALLEN GRAVES replied, “Nothin’ dog. I’m tryin’, tryin’ to find my, my thing (scale) right quick and drop this on here dog. This looks short.”

175. On October 26, 2013, ALLEN GRAVES, MARCUS BENSON, TERRANCE LOMBARD and DARRYL MCFADDEN met in the driveway of 3742 Parker Street, Detroit, Michigan. During this meeting, MCFADDEN sold ALLEN GRAVES approximately 200 Ritalin pills for .50 cents each. Additionally, LOMBARD sold ALLEN GRAVES approximately 100 Percocet 30 mg pills. During the meeting, ALLEN GRAVES mentioned that he was waiting on another supplier from the Westside of Detroit to supply him with a “brick” (kilogram) of “hard” (crack cocaine).

176. On October 27, 2013, at approximately 2:51 p.m., ALLEN GRAVES called EDWARD HEARN on the telephone. During the conversation, ALLEN GRAVES asked, “Hey, you got like 10 of those (10 ounces of cocaine base (“crack”))?” HEARN asked, “Who?” ALLEN GRAVES replied, “10.” HEARN asked, “Oh, hell no, 10 juices (10 ounces of cocaine base (“crack”))?” ALLEN GRAVES said, “Yeah.” HEARN replied, “Hell nah, nope.” ALLEN GRAVES asked, “Can you grab me 10?” HEARN said, “Hell nah, it ain’t even around like that

right now. Nope.” ALLEN GRAVES said, “Damn.” HEARN replied, “I wish I could, but I ain’t even around like that right now.” ALLEN GRAVES asked, “How many you got, how many you got I can grab?” HEARN said, “Shit, I probably only got like one, right now. . . Man, my regular people (supplier) ain’t really been around bub, it been. Yeah, it kinda been hit or miss the last few weeks.” ALLEN GRAVES advised, “Yeah I know, me too. . . . That’s how it been with me too dude.” HEARN advised, “Well call me. I got the one (ounce) though for ya, shit.” ALLEN GRAVES replied, “Shit, ain’t no use in me, you know ridin’, makin’ that ride (to Detroit) for just that one (ounce).” HEARN said, “. . . If some more get around, I’ll call you.” ALLEN GRAVES responded, “Yeah, I’m sayin’, if I would have knew it was the melt (good quality) like that though, I would have grabbed everything you had.” HEARN advised, “Oh hell yeah, alright, well let me know.” ALLEN GRAVES replied, “Alright.” HEARN stated, “I mean I’ll call you when some more come around, but to be honest, shit I don’t know bro, I been waitin’ for weeks bro. My regular people ain’t been on, goin’ on three weeks bub, but I’ll call and let you know.” ALLEN GRAVES replied, “Right, right, right, shit anything else come around, let me know too n\*\*\*a.” HEARN responded, “Ok, bet.” ALLEN GRAVES stated, “Alright.”

177. On October 27, 2013, at approximately 11:04 p.m., A.W. (a person known to the grand jury, but not indicted herein) called DANIELLE SULLIVAN on the telephone. During the call, A.W. asked, “Ok, does he (ALLEN GRAVES) have any bars (Xanax pills)?” SULLIVAN replied, “No.” Later, A.W. said, “Yeah, he (A.W.’s drug customer) just text me asking for some Zannies (Xanax). That’s why I asked if you could, is there any around. He won’t pay no three (dollars) for some footballs (Xanax pills) though, but I know if, he’ll trade, I know he’s good.” Later in the conversation, A.W. asked, “Do they (the distributors at the drug house on Senate

Street) got some 30s (Percocet 30 mg pills)?" SULLIVAN replied, "Yeah." Later, SULLIVAN asked, "Um, is, do you, wait, I need to know, do you have the, the one stuff I asked you about earlier, do you have that?" A.W. asked, "The G (gram)?" SULLIVAN replied, "Of, of H (heroin), C (crack) or H?" A.W. replied, "H (heroin)."

178. On October 28, 2013, at approximately 5:09 p.m., DANIELLE SULLIVAN called ALLEN GRAVES on the telephone. During the call, SULLIVAN said, "I'm not going to be able to get my pills until tomorrow 'cause I gotta get my insurance card up there, so I'm gonna have my mom drop off the insurance card tonight." ALLEN GRAVES replied, "You full of shit, you know that? I'm telling you this right now." SULLIVAN said, "Ok, then you can eat your words tomorrow RUDY, you can eat all your f\*\*\*ing shit up tomorrow." ALLEN GRAVES replied, "You better. You better have my f\*\*\*in' money when I get there, when I get, when I get." SULLIVAN said, "Like I said, I'll give you some of those (pills instead of money)." ALLEN GRAVES said, "No, you have my money when I get there."

179. On October 29, 2013, at approximately 6:15 p.m., GREG BURKETT called ALLEN GRAVES on the telephone. During the conversation, ALLEN GRAVES said, "Sorry for the wait dog. I'm waitin' on my, you know, on my man (supplier) and shit, you know?" BURKETT replied, "Yeah, I'm dyin', I'm dyin' over here man." ALLEN GRAVES said, "I know, I know, he supposed to been his ass here. He got into a little trouble and stuff on the road, so you know. . . Yeah, everything alright, everything alright, you know what I'm sayin'?" I'm just waitin' for him to touch down." BURKETT said, "Yeah 'cause I need to get, I need to get that (cocaine base ("crack")) and a little bit more, you know what I'm sayin'?" ALLEN GRAVES replied, "I know. . . I know, it's like you and three other people (customers)." BURKETT said, "Yeah, I, I, I just got done working man, so I'm gonna, I was just yellin' at ya

'cause I been getting' blowed up (customers have been calling)." ALLEN GRAVES said, "You know what, it's gonna be tomorrow or the next day for sure."

180. On October 29, 2013, at approximately 9:19 p.m., ALLEN GRAVES called MARCUS BENSON on the telephone. During the conversation, BENSON said, "You want some Kool-Aid (prescription cough syrup)?" ALLEN GRAVES replied, "Hell yeah! Grape?" BENSON said, "Yeah, grape man. My man (supplier) got, got an eight ounce bottle now." ALLEN GRAVES asked, "What he, what's he tagging (how much)?" BENSON replied, "He want 225 (\$225) for it." ALLEN GRAVES said, "Alright. I want it dog, as long as it's sealed dog, straight on there." BENSON replied, "We be picking them up from the pharmacy today. . ."

181. On October 29, 2013, at approximately 9:47 p.m., Source 7 arrived at 410 North State Street, Marion, Ohio, and met with ALLEN GRAVES. During the meeting, ALLEN GRAVES sold Source 7 approximately .8 grams of cocaine base ("crack") for \$100.

182. On October 31, 2013, at approximately 5:21 p.m., ALLEN GRAVES called A.G., Jr., aka Po, (a person known to the grand jury, but not indicted herein) on the telephone. During the conversation, ALLEN GRAVES said, ". . . Then, I just got these houses. I got three, I got five f\*\*\*ing houses. I gotta pay 2500 (\$2,500)." Later in the conversation, A.G., Jr., said, "I had talked to TEZ (MARTEZ MONTGOMERY)." ALLEN GRAVES replied, ". . . You know I just got him a house. You know that right? I bought him a house (215 Bellevue Avenue, Marion, Ohio). He told you?" A.G., Jr., replied, "He said you still gotta make 'em pay rent on it." ALLEN GRAVES advised, "Po, yeah he gotta pay the rent, he gotta pay the mortgage. . . Po, he gotta pay the mortgage. You know what I'm sayin'? I'm not fittin' to pay all these mortgage. . . Po, listen to me, listen to me. It ain't, it's not like that Po. You, you buying, you buying the



house. You ain't payin', you buying it. . . . What he (MONTGOMERY) think, I would just buy him a whole, I mean a whole twenty thousand on a house to give to him? I already put up like, Po you just don't want to believe how much I put up to get these five houses. These house I own. I'm fittin' to own. I still gotta pay, you know what I'm sayin'? I gotta pay mortgage on 'em every month. . . He (MONTGOMERY) don't understand that. They better, they better understand dog. You need to talk to, tell that n\*\*\*a dog. I keep catching DANNI (CHILDERS) over at the trap (drug distribution house), over at the house. With BURGER (JERONNE WHITE). She is with BURGER every day. She letting BURGER use the truck, all that shit. BURGER driving around in the truck all in around in the neighborhood. N\*\*\*a this n\*\*\*a hot as a firecracker dog. BURGER is on fire (watched by police). . . Po, no really, BURGER is on fire and it's fittin' to bring, it's fittin' to get DANNI popped (arrested)."

183. On November 1, 2013, at approximately 12:18 p.m., MARTEZ MONTGOMERY placed a three-way phone call with DANNI CHILDERS to ALLEN GRAVES. During the conversation, ALLEN GRAVES said, "Hey T (MARTEZ MONTGOMERY), n\*\*\*a. You got the house (215 Bellevue Avenue, Marion, Ohio) n\*\*\*a. You just payin' it off. . . . The house is y'all's. You payin' the house off n\*\*\*a. You know what I'm sayin'? You buyin' the house." MONTGOMERY asked, ". . . How much I gotta give you to buy the house?" ALLEN GRAVES replied, "That's what I'm sayin'. I'm fittin', I'mma do all the math on 'em. All together I paid, well damn, damn, I'm comin' to see you this week n\*\*\*a." Later in the conversation, ALLEN GRAVES said, "T, mother f\*\*\*ers (the dealers at the drug distribution house), um take our money for they self. When that's supposed to be all our money, you know what I'm sayin'?" MONTGOMERY asked, "Yeah. You talkin' 'bout the fellas?" ALLEN GRAVES replied,

“Yeah, they ain’t never done this shit when, when you was here, you know? . . . Because that’s ours n\*\*\*a, it’s not theirs.”

184. On November 1, 2013, at approximately 12:49 p.m., ALLEN GRAVES called EDWARD HEARN. HEARN asked, “What up doe?” ALLEN GRAVES replied, “You, that’s what I’m trying to see. How you doing?” HEARN said, “It’s (cocaine base (“crack”)) around. Shit, get at me.” ALLEN GRAVES asked, “Is it melt (good quality)?” HEARN replied, “Yep.” ALLEN GRAVES asked, “A lot of ‘em?” HEARN responded, “Yeah. Just call me when you get, you, you in town (Detroit)?” ALLEN GRAVES advised, “I’ll be there soon.”

185. On November 1, 2013, at approximately 1:03 p.m., ALLEN GRAVES called MARCUS BENSON on the telephone. ALLEN GRAVES asked, “Hey, um, them um, um, them um, them stay hards (Viagra pills) n\*\*\*a. How many of them you on?” BENSON asked, “Uh, shit what you need, fifty? I mean, shit, it’s up on you man. How many you want man?” ALLEN GRAVES replied, “Alright, shit, let me um, let me check. I’mma talk to you when I get there (Detroit).” BENSON asked, “Ok, ‘bout how many? . . . So I can make sure he (supplier) got ‘em.” ALLEN GRAVES advised, “Whatever he got, I’ll take ‘em all.”

186. On November 1, 2013, at approximately 1:22 p.m., MARCUS BENSON called ALLEN GRAVES on the telephone. BENSON stated, “Yeah, he got plenty of ‘em (Viagra pills) man.” ALLEN GRAVES asked, “He got how many?” BENSON replied, “He got a thousand of ‘em.” ALLEN GRAVES advised, “Alright, I’ll f\*\*\* with ya.”

187. On November 1, 2013, at approximately 2:11 p.m., GREG BURKETT called ALLEN GRAVES on the telephone. ALLEN GRAVES said, “Hey, as soon as I get in town (Marion, Ohio), I’m gonna call you, okay?” BURKETT replied, “Oh, okay baby.”

188. On November 1, 2013, at approximately 2:33 p.m., CHRISTOPHER PRINCE called ALLEN GRAVES and JERONNE WHITE on the telephone. ALLEN GRAVES stated, "Yeah, I was just sayin' um, nuttin', I had need the rest of that (money). Shit, they finished the rest of that what you had over there?" PRINCE stated, "I know. . . He said it's fifty left. He gave you the money that was in there." ALLEN GRAVES said, "He gave me two ninety, two ninety four (\$294). . . That's what he gave me, B (JERONNE WHITE) did. . . B gave me two ninety four n\*\*\*a." PRINCE asked, "Two ninety four?" ALLEN GRAVES replied, "Yep." PRINCE stated, "Man, they're killing me dog. You know I been in there. It was twenty minutes. How two ninety, it can never be no two ninety four." ALLEN GRAVES then handed the phone to JERONNE WHITE who spoke to PRINCE. PRINCE asked, "You gave him two ninety four bro?" WHITE replied, "Yeah. That was all in your box." PRINCE advised, "I left three fifty (\$350) over there bro. . . And it's a fifty (\$50) left." WHITE stated, "Should have the fifty left." PRINCE replied, "Yeah, but how it's two ninety four? It's supposed to be three ten (\$310)." WHITE stated, "I don't know. They probably took a couple of yours. I don't know. . . They were doin' it, so I ain't stole none of your stuff." PRINCE replied, "Man, I'm fittin' to call them n\*\*\*as bro. I left three fifty bro, . . . 'cause I remember, twenty was missin' out of my shit." WHITE advised, "I lost a bill (\$100)." PRINCE asked, "What, out of your stuff?" WHITE replied, "Hell yeah. . . Shit, I came over there yesterday and it was missin' n\*\*\*a. I had them in here." PRINCE advised, "I ain't took your stuff, I wasn't bro. You know what time I left." WHITE stated, "Yeah, I said f\*\*\* it, left it on the chair." PRINCE stated, "When I left at 11 o'clock man. Ain't nobody come there all day. Me, B.M. (Juvenile #2), and B (BRITTANY PAYNE), and Pimp (Juvenile #1) and I left at 11 o'clock. I been gone the whole day. Better check my man. . . Now I gotta pay out a month. Now I'm missin' forty now. Come on bro. . .

Let me speak to UNC (ALLEN GRAVES).” ALLEN GRAVES got back on the phone said, “Ain’t shit but like sixteen dollars. It’s still a um, a fish (\$50 of crack cocaine) there.” PRINCE replied, “I’m broke though dog. I don’t have no money bro. And he took twenty, somebody took twenty out of there.” ALLEN GRAVES advised, “Ok, dog, I’m sayin’, you owe me a thousand dollar forty (\$1,040).” PRINCE replied, “I owe you a dollar forty right?” ALLEN GRAVES replied, “No, you owe me way more. N\*\*\*a you got two ninety four.” PRINCE responded, “Uh, uh, n\*\*\*a I took forty and then you know I took forty and we got the what’s his names. You said alright.” ALLEN GRAVES advised, “N\*\*\*a, you owed me fifty from the beginning.” PRINCE replied, “I know now, I took the, and I took the forty out the five fifty (\$550) my n\*\*\*a. That’s why I owe you five ten (\$510).” ALLEN GRAVES confirmed, “Right, but that mean five ten.” PRINCE asked, “. . . B (JERONNE WHITE) gave you three ninety four right?” ALLEN GRAVES replied, “Right, he gave me two ninety four, not three ninety four. Two!” PRINCE responded, “. . . I owe you a dollar sixty?” ALLEN GRAVES replied, “Yep.” PRINCE advised, “That n\*\*\*a crazy dog. He called me before you bro. . . But, when I went over there, I’m like damn so I told BURGER (JERONNE WHITE) don’t let nobody touch my bag. . . . B was like man, I ain’t, ain’t nobody touch you. . . . I’m like damn, so how is a twenty missing? I know what I had. I had a solid four (\$400) at this bitch ‘cause I owed a n\*\*\*a what I owed a n\*\*\*a, you feel me? ‘Cause I’m broke. I ain’t got no money made out here and he’s (JERONNE WHITE) like, oh well, I was, it was up there and I’m like no it wasn’t. It was on the floor. B’s (JERONNE WHITE) like, yeah, I came in and it was up here, you feel me? I’m like, how is there a twenty missin’ bro? Man, a dollar fifty out of his and half mine. I’m like come on cuz. I’m like it ain’t, of course it’s gonna be sittin’ up there. A n\*\*\*a can take it outta there and put it up there. . . Common sense bro.” ALLEN GRAVES asked, “I’m sayin’, what

you got the dollar fifty on you now?" PRINCE replied, "No. I got a dollar twenty." ALLEN GRAVES advised, "Alright, I'm on my way over there."

189. On November 1, 2013, at approximately 7:29 p.m., ALLEN GRAVES called EDWARD HEARN on the telephone. HEARN said, "What up Al?" ALLEN GRAVES replied, "What up, what up? Hey, what I wanted to ask you that, that, that melt (good quality cocaine base ("crack")) like last time?" HEARN advised, "Man, its melt, but it ain't that tan. It some other shit though. It's, it's yeah. That's all I f\*\*\* with man. It's all I f\*\*\* with Al." ALLEN GRAVES replied, "Alright then, give me about an hour."

190. On November 1, 2013, at approximately 8:09 p.m., ALLEN GRAVES and STEVEN LESTER drove from Marion, Ohio to Detroit, Michigan, in ALLEN GRAVES' black Saab SUV. At approximately 10:38 p.m., ALLEN GRAVES and STEVEN LESTER arrived at 18231 Avon Avenue, in Detroit, Michigan, and entered the residence.

191. On November 1, 2013, at approximately 11:24 p.m., EDWARD HEARN arrived at 18231 Avon Avenue, in Detroit, Michigan, driving a silver 2011 Chevrolet Impala bearing Michigan License Tag CKV5932 and parked at the curb. At approximately 11:25 p.m., HEARN called ALLEN GRAVES on the telephone. HEARN stated, "Damn Al, you have a n\*\*\*a just pullin' up, just sittin' outside with juices (ounces of cocaine base ("crack")) and shit?" ALLEN GRAVES advised, "... Here I come, here I come." A short time later, ALLEN GRAVES exited the front door of 18231 Avon Avenue and walked out to the silver Chevrolet Impala. ALLEN GRAVES entered the front passenger side door and sat down in the silver Chevrolet Impala. Minutes later, ALLEN GRAVES exited the vehicle and walked into the front door of 18231 Avon Avenue. HEARN departed the area while in possession of \$1,469 in U.S. currency.

192. On November 1, 2013, inside of 18231 Avon Avenue, Detroit, Michigan, ALLEN GRAVES possessed approximately 24.4 grams of cocaine base ("crack"); one Smith & Wesson, .40 caliber, handgun; one Smith & Wesson, .38 caliber, handgun; one Ruger, .40 caliber, handgun; one Ruger, .44 caliber, handgun; one GSG-5, .22 caliber, rifle with attached silencer/suppressor; and one H&R 1871, 12 gauge, shotgun.

193. On November 12, 2013, located inside of 424 Park Street, Marion, Ohio, which was being purchased by ALLEN GRAVES; JERONNE WHITE, Juvenile #1 and two other juveniles, possessed approximately 9 grams of cocaine base ("crack"), 8.1 grams of heroin, 37 Ritalin 20 mg pills, 21 Viagra 100 mg pills, 73 Vicodin (Hydrocodone) 7.5 mg pills, 51 Oxycodone (Percocet) 10 mg pills, 14 Oxycodone (Percocet) 30 mg pills, a loaded 12 gauge Remington shotgun, and a loaded MAR90 AK47 rifle.

194. On November 12, 2013, located inside of 215 Bellevue, Marion, Ohio, a residence occupied by DANNI CHILDERS and CHRISTOPHER PRINCE, CHILDERS and PRINCE possessed approximately 7 grams of cocaine base ("crack"), 7 grams of heroin, and 61 Oxycodone (Percocet) 30 mg pills.

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

COUNT 2

The Grand Jury further charges:

On or about July 10, 2012, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

The Grand Jury further charges:

On or about October 1, 2012, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, did knowingly and intentionally distribute approximately .7 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

The Grand Jury further charges:

On or about October 2, 2012, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, did knowingly and intentionally distribute approximately .7 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

The Grand Jury further charges:

On or about December 21, 2012, in the Northern District of Ohio, Western Division, MARTEZ MONTGOMERY, aka T, aka TEZ, and BRITTANY PAYNE did travel in interstate commerce between the State of Ohio and the State of Michigan, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base (“crack”), a Schedule II controlled substance; heroin, a Schedule I controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate

(Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said MARTEZ MONTGOMERY and BRITTANY PAYNE thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT 6

The Grand Jury further charges:

On or about December 21, 2012, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, and DANIELLE SULLIVAN did travel in interstate commerce between the State of Ohio and the State of Michigan, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base ("crack"), a Schedule II controlled substance; heroin, a Schedule I controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said ALLEN GRAVES and DANIELLE SULLIVAN thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).



COUNT 7

The Grand Jury further charges:

On or about January 14, 2013, in the Northern District of Ohio, Western Division, MARTEZ MONTGOMERY, aka T, aka TEZ, and DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 8

The Grand Jury further charges:

On or about January 16, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately .3 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 9

The Grand Jury further charges:

On or about January 22, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 10

The Grand Jury further charges:

On or about January 23, 2013, in the Northern District of Ohio, Western Division, MARTEZ MONTGOMERY, aka T, aka TEZ, did knowingly and intentionally distribute approximately 2.4 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 11

The Grand Jury further charges:

On or about January 23, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, and CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 3.3 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 12

The Grand Jury further charges:

On or about January 25, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 13

The Grand Jury further charges:

On or about February 18, 2013, in the Northern District of Ohio, Western Division, DEVONTA ADAMS, aka TAY, did knowingly and intentionally distribute approximately .3 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 14

The Grand Jury further charges:

On or about February 19, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 1.5 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 15

The Grand Jury further charges:

On or about February 20, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately 1.5 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 16

The Grand Jury further charges:

On or about February 20, 2013, in the Northern District of Ohio, Western Division, DEVONTA ADAMS, aka TAY, did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and approximately .1 grams of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 17

The Grand Jury further charges:

On or about February 20, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately .7 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 18

The Grand Jury further charges:

On or about February 21, 2013, in the Northern District of Ohio, Western Division, MARTEZ MONTGOMERY, aka T, aka TEZ, and CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 5.7 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 19

The Grand Jury further charges:

On or about February 26, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 20

The Grand Jury further charges:

On or about March 7, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 1 gram of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 21

The Grand Jury further charges:

On or about March 13, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately 4 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 22

The Grand Jury further charges:

On or about March 15, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 3.7 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 23

The Grand Jury further charges:

On or about March 26, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately .7 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 24

The Grand Jury further charges:

On or about May 9, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, and MARNIECE LOVE did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 25

The Grand Jury further charges:

On or about May 10, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 26

The Grand Jury further charges:

On or about May 14, 2013, in the Northern District of Ohio, Western Division, MARNIECE LOVE did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 27

The Grand Jury further charges:

On or about May 17, 2013, in the Northern District of Ohio, Western Division, MARNIECE LOVE did knowingly and intentionally distribute approximately 1.1 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 28

The Grand Jury further charges:

On or about May 23, 2013, in the Northern District of Ohio, Western Division, MARNIECE LOVE did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 29

The Grand Jury further charges:

On or about May 28, 2013, in the Northern District of Ohio, Western Division, ABBEE HEINE and JASON GRAVES, aka JA-BO, did knowingly and intentionally distribute approximately .6 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 30

The Grand Jury further charges:

On or about June 6, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, did knowingly and intentionally distribute approximately .6 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



COUNT 31

The Grand Jury further charges:

On or about June 7, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, did knowingly and intentionally distribute approximately .6 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 32

The Grand Jury further charges:

On or about June 11, 2013, in the Northern District of Ohio, Western Division, JASON GRAVES, aka JA-BO, did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 33

The Grand Jury further charges:

On or about June 13, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 34

The Grand Jury further charges:

On or about June 18, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, did knowingly and intentionally distribute approximately .6 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 35

The Grand Jury further charges:

On or about June 18, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately 1.1 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 36

The Grand Jury further charges:

On or about June 19, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately 1.4 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 37

The Grand Jury further charges:

On or about June 26, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 1.3 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 38

The Grand Jury further charges:

On or about June 27, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 1.2 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 39

The Grand Jury further charges:

On or about July 12, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 40

The Grand Jury further charges:

On or about July 19, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, did knowingly and intentionally distribute approximately 2.1 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 41

The Grand Jury further charges:

On or about July 24, 2013, in the Northern District of Ohio, Western Division, JERONNE WHITE, aka B, aka BURGER, did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and one Oxycodone (Percocet) 20 mg pill, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 42

The Grand Jury further charges:

On or about August 2, 2013, in the Northern District of Ohio, Western Division, DECARLOS BATES, aka LOS, aka RED, and CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately six Oxycodone (Percocet) 30 mg pills, a Schedule II controlled substance, and six Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and (b)(1)(E) and Title 18, United States Code, Section 2.

COUNTS 43-60

The Grand Jury further charges:

On or about the dates and approximate times listed below, in the Northern District of Ohio, Western 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, Section 846:

<u>Count</u>	<u>Defendant(s)</u>	<u>Date</u>	<u>Time</u>
43	DECARLOS BATES, aka LOS, aka RED	June 19, 2013	5:32 p.m.
44	DARRELL JACOBS, aka TODD JERONNE WHITE, aka B, aka BURGER	August 9, 2013	4:09 p.m.
45	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, JERONNE WHITE, aka B, aka BURGER	August 9, 2013	5:35 p.m.
46	JASON GRAVES, aka JA-BO	August 10, 2013	2:38 a.m.
47	JASON GRAVES, aka JA-BO, DANNI CHILDERS	August 18, 2013	2:35 p.m.
48	BRITTANY PAYNE	August 25, 2013	6:08 p.m.
49	ABBEE HEINE JERONNE WHITE, aka B, aka BURGER	August 27, 2013	3:58 p.m.
50	DANNI CHILDERS MARTEZ MONTGOMERY, aka T, aka TEZ CHRISTOPHER PRINCE	August 31, 2013	12:34 a.m.
51	MARTEZ MONTGOMERY, aka T, aka TEZ JERONNE WHITE, aka B, aka BURGER	September 5, 2013	5:29 p.m.
52	STEVEN LESTER JERONNE WHITE, aka B, aka BURGER	September 7, 2013	2:41 p.m.
53	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY DARRYL MCFADDEN, aka HOMIE	September 16, 2013	6:07 p.m.

<u>Count</u>	<u>Defendant(s)</u>	<u>Date</u>	<u>Time</u>
54	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY MARNIECE LOVE	September 16, 2013	7:42 p.m.
55	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY GREG BURKETT	October 11, 2013	8:01 p.m.
56	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY TERRANCE LOMBARD, aka T	October 11, 2013	10:16 p.m.
57	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY MARCUS BENSON	October 16, 2013	2:31 p.m.
58	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY DANIELLE SULLIVAN	October 22, 2013	9:40 p.m.
59	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY EDWARD HEARN, aka CHARDY ROSET	October 26, 2013	4:57 p.m.
60	ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY EDWARD HEARN, aka CHARDY ROSET	October 27, 2013	2:51 p.m.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 61

The Grand Jury further charges:

On or about August 20, 2013, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, did knowingly and intentionally distribute approximately ten Oxycodone (Percocet) 20 mg pills, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 62

The Grand Jury further charges:

On or about August 30, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately 1.5 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 63

The Grand Jury further charges:

On or about September 20, 2013, in the Northern District of Ohio, Western Division, TERRANCE LOMBARD, aka T, did travel in interstate commerce between the State of Michigan and the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base ("crack"), a Schedule II controlled substance; heroin, a Schedule I controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said TERRANCE LOMBARD thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 64

The Grand Jury further charges:

On or about September 22, 2013, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, did travel in interstate commerce between the State of Ohio and the State of Indiana, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base (“crack”), a Schedule II controlled substance; heroin, a Schedule I controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said ALLEN GRAVES thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 65

The Grand Jury further charges:

On or about September 30, 2013, in the Northern District of Ohio, Western Division, CHRISTOPHER PRINCE did knowingly and intentionally distribute approximately six Oxycodone (Percocet) 30 mg pills, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



COUNT 66

The Grand Jury further charges:

On or about October 10, 2013, in the Northern District of Ohio, Western Division, STEVEN LESTER did travel in interstate commerce between the State of Michigan and the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base (“crack”), a Schedule II controlled substance; heroin, a Schedule I controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said STEVEN LESTER thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 67

The Grand Jury further charges:

On or about October 26, 2013, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, and STEVEN LESTER did travel in interstate commerce between the State of Ohio and the State of Michigan, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base (“crack”); a Schedule II controlled substance; heroin, a Schedule I controlled

substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said ALLEN GRAVES and STEVEN LESTER thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT 68

The Grand Jury further charges:

On or about October 29, 2013, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 69

The Grand Jury further charges:

On or about November 1, 2013, in the Northern District of Ohio, Western Division, ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY, and STEVEN LESTER did travel in interstate commerce between the State of Ohio and the State of Michigan, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine base (“crack”); a Schedule II controlled substance; heroin, a Schedule I controlled

substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled substance; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said ALLEN GRAVES and STEVEN LESTER thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

COUNT 70

The Grand Jury further charges:

From in or around April, 2013, to on or about June 18, 2013, the exact dates unknown, in the Northern District of Ohio, Western Division, ABBEE HEINE did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee, and agent, namely 438 1/2 North Prospect Street, Marion, Ohio, and did knowingly and intentionally rent, lease, profit from, and otherwise make available for use, with or without compensation, 438 1/2 North Prospect Street, Marion, Ohio, for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, namely heroin, a Schedule I controlled substance; cocaine base ("crack"), a Schedule II controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 71

The Grand Jury further charges:

From in or around June, 2013, to on or about September 18, 2013, the exact dates unknown, in the Northern District of Ohio, Western Division, ABBEE HEINE did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee, and agent, namely 323 Mound Street, Marion, Ohio, and did knowingly and intentionally rent, lease, profit from, and otherwise make available for use, with or without compensation, 323 Mound Street, Marion, Ohio, for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, namely heroin, a Schedule I controlled substance; cocaine base (“crack”), a Schedule II controlled substance; Oxycodone (Percocet) pills, a Schedule II controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 72

The Grand Jury further charges:

From in or around October, 2012, to on or about December, 2013, the exact dates unknown, in the Northern District of Ohio, Western Division, DANNI CHILDERS did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee, and agent, namely 238 Park Boulevard, Marion, Ohio, and did knowingly and intentionally rent, lease, profit from, and otherwise make available for use, with or without compensation, 238 Park Boulevard, Marion, Ohio, for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, namely heroin, a Schedule I controlled substance; cocaine base (“crack”), a Schedule II controlled substance; Oxycodone (Percocet) pills, a Schedule II

controlled substance; Methylphenidate (Ritalin) pills, a Schedule II controlled; Hydrocodone (Vicodin) pills, a Schedule III controlled substance; and Alprazolam (Xanax) pills, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1 through 72 are incorporated herein by reference. As a result of the foregoing offenses, defendants ALLEN GRAVES, aka ALAN, aka UNC, aka RUDY; MARTEZ MONTGOMERY, aka T, aka TEZ; TERRANCE LOMBARD, aka T; EDWARD HEARN, aka CHARDY ROSET; DARRYL MCFADDEN, aka HOMIE; JERONNE WHITE, aka B, aka BURGER; CHRISTOPHER PRINCE; DANNI CHILDERS; DECARLOS BATES, aka LOS, aka RED; DEVONTA ADAMS, aka TAY; JASON GRAVES, aka JA-BO; MARNIECE LOVE; BRITTANY PAYNE; MARCUS BENSON; GREG BURKETT; DARRELL JACOBS, aka TODD; DANIELLE SULLIVAN; STEVEN LESTER; and ABBEE HEINE, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

A TRUE BILL.

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