

UNITED STATES DISTRICT COURT
for the
Eastern District of California

United States of America
v.
TOMMIE THOMAS, aka Tapp
Case No. 5:17-mj-00046-JLT
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 3, 2017 in the county of Kern in the
Eastern District of California, the defendant(s) violated:

Code Section
21 U.S.C. § 841(a)(1)

Offense Description
Distribution of Methamphetamine

This criminal complaint is based on these facts:
(see attachment)

[X] Continued on the attached sheet.

[Signature of Brian Myers]
Complainant's signature

Brian Myers, FBI Special Agent
Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1.

Date: 12/6/17

[Signature of Jennifer L. Thurston]
Judge's signature

City and state: Bakersfield, California

Jennifer L. Thurston, U.S. Magistrate Judge
Printed name and title

1 cocaine, crack cocaine, and methamphetamine, as well as investigations involving narcotics
2 conspiracies, the laundering of narcotics proceeds and monetary instruments derived from narcotics
3 activities, and the conducting of monetary transactions involving the proceeds of specified unlawful
4 activities.

5 4. In conducting these investigations, I have debriefed defendants, informants, and
6 witnesses who had personal knowledge regarding major narcotics trafficking organizations. I have
7 also participated in various aspects of these investigations, including conducting physical and
8 electronic surveillance, using informants and cooperating sources, executing search warrants, and
9 making arrests. In particular, I have participated in several large investigations that have involved the
10 court-authorized interception of wire and electronic communications of specified unlawful activities
11 and conspiracies associated with criminal narcotics. I have also assisted in investigations targeting
12 gang members who were involved in a pattern of racketeering activities.

13 5. In addition, during my employment with the FBI, I have worked with both Federal,
14 local and state law enforcement agencies to include the DEA, the ATF, HSI, the Bakersfield Police
15 Department (“BPD”), the Kern County Sheriff’s Office, and the California Highway Patrol. Working
16 with these different agencies has allowed me to learn from law enforcement officers with a wide
17 range of experience in drug law enforcement as well as units focused on violent gang activities.

18 6. For approximately four years, I have worked as the coordinator for the Kern County
19 Violent Crimes Gang Task Force (KCVCGTF). During this time, I have debriefed numerous current
20 and former gang members from Mexican Mafia related Sureno gangs, Crips criminal street gangs,
21 and outlaw motorcycle gangs. I know that gangs will often use a hierarchy to assert the direction of
22 the gang. These gangs will often use violence to establish a specific area to operate their enterprise,
23 and in that area and elsewhere, members of the gang will sell narcotics, commit robberies, burglaries,
24 shootings, and murders to fund the furtherance of the gang. I know that certain gangs have to pay for
25 the right to sell drugs in a certain area, and in some instances this is in the form of “taxes” to higher
26 ranking gang members. I have learned that Crips in Bakersfield and Kern County will conduct home
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1 burglaries in an attempt to obtain firearms, jewelry, money, and other valuable items.

2 7. Through these investigations, my training and experience, and conversations with
3 other more experienced agents and law enforcement personnel, I have become familiar with the
4 methods used by individuals involved in criminal street gangs and in drug trafficking organizations to
5 conduct various criminal activities, including drug manufacture and distribution, money laundering,
6 and firearms offenses, among others. I have also become familiar with the methods used by such
7 individuals to avoid detection by law enforcement, including the frequent use of: multiple cellular
8 telephones, including those that are subscribed to in the names of other persons; prepaid cellular
9 telephones; counter surveillance techniques; coded and ambiguous language; multiple vehicles;
10 vehicles equipped with concealed compartments; and false identities.

11 8. Furthermore, having previously assisted in wiretap investigations, and having
12 discussed the use of wiretaps with more experienced agents, I am aware of a variety of investigative
13 techniques and resources that should be utilized during a wiretap investigation, including but not
14 limited to such techniques as surveillance, the use of confidential sources, the execution of search
15 warrants, the analysis of telephone toll records, and the analysis of wire intercept communications in
16 other Title III and California state wiretap investigations. Through my prior experiences and
17 speaking with other law enforcement officers, I have become particularly familiar with methods
18 employed by large narcotics organizations and criminal street gangs, and the sophisticated tactics that
19 they routinely use to attempt to thwart investigation of their narcotics organizations, such as the
20 frequent changing of cell phones, the use of pre-paid calling cards, counter-surveillance, elaborately
21 planned smuggling schemes tied to legitimate businesses, the use of false or fictitious identities, and
22 coded communications and conversations, including coded language related to narcotics trafficking
23 and firearms.

24 9. The FBI and the BPD are jointly investigating the case described below. I have
25 worked closely with BPD Detective Robert Pair during this investigation. Throughout this affidavit, I
26 have drawn various conclusions based on my training and experience, and my knowledge of this

1 investigation. Det. Pair has reviewed this affidavit and agrees with the conclusions I have drawn
2 herein. Det. Pair's training and experience is as follows:

3 a. Det. Pair has been a police officer for the BPD for the past 15 years. He is
4 currently a detective assigned to the Robbery/Homicide Detail. He has previously been assigned to 5
5 cumulative years in the BPD Special Enforcement Unit as a gang investigator. He has also been
6 assigned as a Task Force Officer with the Federal Bureau of Investigations (FBI) as a member of the
7 Kern County Violent Crime Gang Task Force (KCVCGTF).

8 b. Det. Pair has completed over one hundred hours of formal training related to
9 gangs, including gang culture, changing trends, internal structure and crimes. He has discussed
10 criminal gang activity with current and former members of the BPD and KCSD Gang Units in order
11 to stay current and increase his level of knowledge and expertise regarding gangs and their criminal
12 activities. He regularly consults with other officers, detectives, deputies and agents of the BPD, Kern
13 County Sheriff's Department (KCSD), Bureau of Prisons (BOP), FBI and Drug Enforcement
14 Administration (DEA) with respect to criminal street gangs and their methods of operation as it
15 relates to the crimes of violence.

16 c. Det. Pair has testified in the Kern County Superior Court as a qualified expert
17 on gangs at least ten times. He has presented gang training as an instructor to the California Juvenile
18 Officers Association, regarding current gang trends. He routinely presents informational lectures to
19 Bakersfield community members regarding gang trends in Kern County.

20 d. Det. Pair has been involved either as the case agent or in a supporting role in
21 more than 50 investigations involving homicide, weapons violations, and criminal street gang-related
22 offenses. He has patrolled the territories within the City of Bakersfield and County of Kern that are
23 known gang strongholds claimed by various criminal street gangs ("gangs"), and has conducted
24 surveillance of criminal street gang members ("gang members"). He has personally contacted more
25 than one hundred gang members under casual, confrontational and investigative circumstances. He
26 has had in excess of one hundred conversations with both active and former gang members regarding
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1 how these gangs operate, the changing gang trends and cultures and gang-related criminal activities.
2 He has participated in over 50 gang-related investigations involving drug sales, weapons possessions,
3 assaults, murders, robberies and witness intimidation, and the gang customs and culture related to
4 these investigations. He has been involved in over one hundred arrests of gang members for gang-
5 related crimes. He is familiar with criminal street gang (gang) culture, methods, terms, expressions,
6 paraphernalia associated with gang activities, structure, politics and primary gang crimes such as
7 murder, assault with deadly weapon, weapon possession, burglary, witness intimidation, robbery and
8 drug trafficking.

9 e. Regarding gang-related narcotics trafficking, Det. Pair has participated as case
10 agent or other investigatory role in excess of twenty investigations regarding criminal street gangs
11 and narcotics trafficking. He has attended the California Peace Officer Standards and Training
12 certified Basic Narcotics course with 80 hours of formal training regarding narcotics investigations.
13 He has previously received Clandestine Laboratory Safety Certification through the California
14 Department of Justice. He was assigned to the BPD Major Narcotics Violators Unit for approximately
15 one year in both an undercover and enforcement role. He has spoken with in excess of 20 gang
16 members regarding common tactics of narcotics traffickers who are also involved in criminal street
17 gangs. He has been qualified and testified in the Superior Court of Kern County, California, as a
18 narcotics expert in regards to methamphetamine, heroin, marijuana and cocaine base over twenty
19 times cumulatively.

20 **II. PURPOSE OF AFFIDAVIT**

21 10. This affidavit is intended to show that there is sufficient probable cause for the
22 requested complaints, arrest warrants, and search warrants, and does not purport to set forth all of my
23 knowledge of the investigation of this matter.

24 **A. Complaints and Arrest Warrants**

25 11. This affidavit is made in support of a complaint against, and arrest warrants for

26 a. William THOMAS for violations of 21 U.S.C. § 841(a)(1) (distribution of
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1 crack cocaine). See sections V(E), (F) and (G) below.

- 2 b. Tommie THOMAS for a violation of 21 U.S.C. § 841(a)(1) (distribution of
3 methamphetamine). See section V(P) below.
- 4 c. Danny WILLIS for a violation of 18 U.S.C. § 922(g)(1) (felon in possession of
5 a firearm). See sections V(L), (M) below.
- 6 d. Gary PIERSON for a violation of 18 U.S.C. § 922(g)(1) (felon in possession of
7 a firearm). See section V(M) below.
- 8 e. Bernard WARREN for a violation of 18 U.S.C. § 922(g)(1) (felon in
9 possession of a firearm). See section V(L) below.
- 10 f. Luis FERNANDEZ for a violation of 21 U.S.C. § 841(a)(1) (distribution of
11 methamphetamine). See sections V(I) below.
- 12 g. Ladaireus JONES for a violation of 18 U.S.C. § 922(g)(1) (felon in possession
13 of a firearm) See section V(O), (N) below.
- 14 h. Manuel CRUZ III for a violation of 21 U.S.C. § 846, 841(a)(1) (conspiracy to
15 possess with intent to distribute, and to distribute, marijuana). See section
16 V(N) below.
- 17 i. Myron DEWBERRY for a violation of 18 U.S.C. § 922(g)(1) (felon in
18 possession of a firearm). See section V(Q) below.
- 19 j. Bryshanique ALLEN for a violation of 18 U.S.C. § 1956(a)(1) (money
20 laundering). See section V(K), (N) below.

21 **B. Search Warrants**

22 12. This affidavit is also submitted in support of search warrants for the following
23 locations and vehicles, which are further described below and in ATTACHMENTS A-1 through A-11
24 (hereby incorporated), and which are collectively referred to hereinafter as the “SUBJECT
25 PREMISES.”

26 13. 409 Stephens Drive, Apt 9, Bakersfield, CA (hereinafter referred to as “William
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1 THOMAS’s Residence”) for evidence of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to
2 possess with intent to distribute, and to distribute, crack cocaine, and manufacture and possession
3 with intent to distribute crack cocaine; 18 U.S.C. § 1955 (illegal gambling business), and 18 U.S.C. §
4 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy). See sections V(D),(E),
5 (F) and (G) below.

6 14. 4032 O Street #22, Bakersfield, CA (hereinafter referred to as “Danny WILLIS’s
7 Residence”) for evidence of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to possess with
8 intent to distribute, and to distribute, heroin, 18 U.S.C. § 922(g)(1) (felon in possession of a firearm),
9 18 U.S.C. § 1959 (Violent Crime in Aid of Racketeering); and 18 U.S.C. § 1962(c), (d) (Racketeer
10 Influenced and Corrupt Organizations/Conspiracy). See sections V(K), (L) below.

11 15. 1321 N Street, Bakersfield, CA (hereinafter referred to as “Gary PIERSON’s
12 Residence”) for evidence of violations of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and
13 ammunition); and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt
14 Organizations/Conspiracy). See sections V(L) below.

15 16. 3030 Verde Street, Apt. 19, Bakersfield, CA (hereinafter referred to as “Kristi
16 PIERSON’s and T.THOMAS’s Residence”) for evidence of violations of 21 U.S.C. § 846, 841(a)(1),
17 conspiracy to possess with intent to distribute, and to distribute, methamphetamine, and 18 U.S.C. §
18 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy). See sections
19 V(H),(I),(J),(O) below.

20 17. 4812 Summertree Lane #A, Bakersfield, CA and 720 Terrace Way, Apartment 17,
21 Bakersfield, CA (hereinafter referred to as “Ladaireus JONES’s Residences”) for evidence of 18
22 U.S.C. § 922(g)(1) (felon in possession of a firearm and ammunition), and 18 U.S.C. § 1962(c), (d)
23 (Racketeer Influenced and Corrupt Organizations/Conspiracy), and Title 18 U.S.C § 924(c) (using a
24 firearm in furtherance of a drug trafficking crime/crime of violence). See sections V(M)(N) below.

25 18. 8732 High Ridge Road, Bakersfield, CA and 600 New Stine Rd #7, Bakersfield, CA
26 (“hereinafter referred to as “Paul DEAN’s Residences”) for evidence of violations of 21 U.S.C. §
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1 846, 841(a)(1), conspiracy to possess with intent to distribute, and to distribute heroin and cocaine,
2 and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy). See
3 section V(M) below.

4 19. 6105 Ringsdale Court, Bakersfield, CA (hereinafter referred to as “Larry THOMAS’s
5 Residence 1”) and 612 El Sereno Drive, Bakersfield, CA (hereinafter referred to as “Larry
6 THOMAS’s Residence 2”) for evidence of Title 18 U.S.C § 922(g)(1) (felon in possession of a
7 firearm), 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy), and
8 18 U.S.C. § 1343 (wire fraud). See sections V(Q) below.

9 20. 710 T. Street, Bakersfield, CA (hereinafter referred to as Bryshanique ALLEN’s
10 residence) for evidence of 18 U.S.C. § 1956(a)(1) (money laundering), 18 U.S.C. § 1959 (Violent
11 Crime in Aid of Racketeering), and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt
12 Organizations/Conspiracy). See sections V(J),(K) below.

13 **III. EVIDENCE OF CRIMES LIKELY TO BE FOUND AT SUBJECT PREMISES**

14 21. Based on my training and experience, and knowledge of this investigation, I believe
15 the following:

16 a. Drug trafficking is an ongoing or continuing criminal enterprise being
17 conducted by a criminal street gang in Bakersfield, CA known as the West Side Crips (hereinafter,
18 “WSC”). Narcotics traffickers, or those that assist in that venture, maintain and tend to retain
19 accounts or records of those transactions. Drug traffickers tend to keep these accounts and records in
20 their residence, vehicles, safes, storage containers, and in other areas under their control.

21 b. Because narcotics traffickers frequently continue their criminal activity
22 indefinitely, they keep records of their illegal activities for a period of time extending beyond the time
23 during which they actually possess controlled substances, in order to maintain contact with criminal
24 associates for future narcotic transactions, and to have records of prior transactions for which, for
25 example, they might still be owed narcotics proceeds, or might owe someone else money. Because
26 possession of the documents themselves, unlike possession of narcotics, is not illegal, narcotics
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1 traffickers often fail to take precautions to destroy or conceal the documentation. Therefore,
2 documentation may survive for many months, sometimes years, after a large volume drug transaction
3 has occurred, often in the traffickers' residences and vehicles. Such documentation may be in hard
4 copy form or stored in digital devices such as computers, cell telephones and other mobile
5 communication devices.

6 c. Individuals involved in narcotics trafficking commonly provide narcotics to
7 trusted distributors in their organization on credit, and commonly obtain narcotics from their
8 suppliers on credit. Therefore, I am aware that individuals involved in narcotics trafficking maintain
9 books, records, customer lists, receipts, notes, ledgers and other papers relating to the transportation,
10 receipt, ordering, sales, and distribution of narcotics, narcotics proceeds, and equipment, and that
11 such documents may be in code to thwart law enforcement detection. Such records often indicate the
12 identity of co-conspirators. The aforementioned books, records, receipts, notes, ledgers,
13 correspondence, etc., are commonly maintained where the narcotics traffickers have ready access to
14 them, i.e., homes, offices, and automobiles. Such documentation may be in hard copy form or stored
15 in digital devices such as computers, cell telephones and other mobile communication devices.

16 d. Drug traffickers often place their assets in names other than their own to avoid
17 detection of those assets by law enforcement; those persons are commonly family members, spouses
18 or companions, friends, and associates who accept title of assets to help the trafficker avoid discovery
19 and detection.

20 e. Individuals involved in narcotics trafficking will conduct narcotics-related
21 activities at various locations and residences in an effort to avoid law enforcement detection.

22 f. Individuals involved in narcotics trafficking often conceal evidence of their
23 drug trafficking, including narcotics and narcotics proceeds, in their residences, or the residences of
24 friends or relatives, and in surrounding areas to which they have ready access such as garages,
25 carports and outbuildings. They also conceal evidence in vehicles, including vehicles outside of their
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1 residences, so that they have ready access to it and so that they can hide it from law enforcement,
2 including law enforcement officers executing search warrants at their residences or businesses.

3 g. Drug traffickers often utilize vehicles to transport and distribute controlled
4 substances in facilitation of their trafficking activities. Traffickers will also utilize vehicles as
5 locations to store controlled substances prior to distribution. Large-scale traffickers will often use
6 vehicles with hidden compartments, also known as traps, to store narcotics or narcotics proceeds in
7 order to conceal the presence of such contraband from law enforcement. Drug traffickers will often
8 utilize vehicles registered in the names of individuals other than themselves in an effort to avoid
9 detection by law enforcement.

10 h. Individuals involved in narcotics trafficking commonly use certain
11 paraphernalia to package and prepare controlled substances for distribution (such as tupperware,
12 cellophane, heat sealers, glycine or plastic baggies, latex gloves, cutting agents and dilutents,
13 chemical testing devices, triple beam scales and other weighing devices, measuring devices, strainers,
14 compression devices, etc.). Individuals involved in narcotics trafficking commonly store these items
15 in their residences, garages, outbuildings, storage areas, carports, and in the residences of friends or
16 relatives, in their vehicles, and in other areas to which the traffickers have ready access.

17 i. Individuals involved in narcotics trafficking generally sell narcotics for cash
18 proceeds. Drug traffickers often have on hand large amounts of United States currency in order to
19 maintain and finance their ongoing business. Drug traffickers often keep large sums of currency,
20 caches of drugs, financial instruments, precious metals, jewelry, automobiles, and other items of
21 value and/or proceeds of drug transactions, including evidence of financial transactions related to
22 obtaining, transferring, secreting, or spending large sums of money acquired from engaging in the
23 acquisition and distribution of controlled substances in their residence, vehicles, safes, storage
24 containers, and in other areas under their control.

25 j. Unexplained wealth is probative evidence of crimes motivated by greed, in
26 particular, trafficking in controlled substances.

1 k. Individuals involved in narcotics trafficking often launder money obtained
2 through illegal drug transactions through legitimate businesses. Traffickers who are involved in such
3 money laundering often structure financial transactions to avoid reporting requirements, and often
4 keep records of their activities and financial transactions. To escape detection, however, they mix
5 and intermingle those records with records of lawful transactions. In such instances, it is necessary to
6 analyze the entire record to isolate the records of unlawful transactions, and it is not feasible to extract
7 the records of unlawful activities without such analysis.

8 l. Additionally, when narcotics traffickers amass large quantities of cash from the
9 sale of narcotics, they will sometimes attempt to legitimize these profits through the use of banks and
10 financial institutions and their services, including accounts, securities, traveler's checks, cashiers'
11 checks, money orders, wire transfers, certificates of deposit, and safe deposit boxes. Records from
12 such transactions are often maintained in residences, offices, garages, storage buildings, automobiles,
13 and safe deposit boxes.

14 m. Narcotics traffickers typically will obtain and distribute controlled substances
15 on a regular basis, much as any distributor of a legitimate commodity would purchase stock for sale
16 such narcotics traffickers will also have an "inventory" which will fluctuate in size depending on the
17 demand for the product.

18 n. Drug traffickers commonly have in their possession (that is, on their person, at
19 their residence, and in areas under their control), firearms, including, but not limited to, handguns,
20 pistols, revolvers, rifles, shotguns, machine guns, silencers, and other weapons. Such firearms are
21 used to protect and secure a trafficker's property. Such property may include, but is not limited to,
22 narcotics and other dangerous drugs, jewelry, narcotic paraphernalia, books, records, ledgers, and
23 quantities of currency related to their drug trafficking activity.

24 o. Drug traffickers may take or cause to be taken, photographs, videotapes, or
25 other recordings of themselves, their associates, their property, and their product. Such traffickers
26 often maintain photographs and/or videotapes at their residences or in the areas under their control.

1 p. Narcotics traffickers may maintain in their possession or at their residence
2 fictitious identification, including, but not limited to, drivers licenses, employment cards, insurance
3 cards, social security cards, naturalization records, certificates of birth and passports which are
4 obtained by the traffickers and utilized in an effort to prevent law enforcement identification of the
5 traffickers and their drug trafficking activity.

6 q. Individuals involved in narcotics trafficking often use cellular telephones and
7 other communication devices sometimes in fictitious and/or other individual's names. Traffickers
8 commonly receive telephone calls, voicemail messages and text messages from individuals seeking to
9 conduct narcotics transactions. As a result, traffickers often maintain in their residences, vehicles,
10 and locations where they conduct transactions, records and items that reflect or contain names,
11 addresses, and/or telephone numbers for their associates and co-conspirators in the drug trafficking
12 organization. These records and items include telephone address books and telephone listings, text
13 messages, voicemails, as well as letters, telephone bills, e-mails, and personal notes reflecting names,
14 identities, addresses, and telephone numbers. Traffickers often keep records and evidence of their
15 illegal activities for a period of time extending beyond during which they actually possessed illegal
16 narcotics and controlled substances, in order to maintain contact with their criminal associates for
17 future drug transactions, and so that they can have records of prior transactions for which a trafficker
18 might still be owed money, or might owe someone else money.

19 r. Individuals involved in narcotics trafficking often use various locations to
20 serve different functions so that customers, thieves, and law enforcement do not learn about any one
21 location where large quantities of narcotics, money, and/or other drug-related assets are stored.
22 Therefore, one or more locations are often used to store lesser amounts of narcotics, money, and/or
23 drug-related assets, and additional locations are used to meet customers.

24 22. It is my opinion, based on my training and experience, and the training and experience
25 of other law enforcement investigators with whom I have spoken, that the items listed in the
26 Attachment Bs, as they relate to drug trafficking offenses, which are incorporated into this affidavit
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1 by reference, are items often associated with the trafficking and distribution of controlled substances,
2 including, but not limited to, methamphetamine, crack cocaine, marijuana, and prescription pills, as
3 well as the proceeds from such illegal operations.

4 23. In addition to the drug evidence detailed above, I also believe that evidence
5 establishing that (1) the WSC is an associated-in-fact enterprise as defined in 18 U.S.C. § 1961(4); (2)
6 that its members and associates participate in the conduct of the WSC's affairs through a pattern of
7 racketeering activity, in violation 18 U.S.C. § 1962(c) and (3) that its members and associates
8 conspire to violate 18 U.S.C. § 1962(c), in violation of 18 U.S.C. § 1962(d), will be found at the
9 locations for which permission to search for evidence of these offenses has been requested. For
10 instance, based on my training, experience and knowledge of this investigation, I believe that
11 evidence of gang membership will be located at these locations. Through my training, experience,
12 and consultation with other law enforcement officers, I also believe the following:

13 a. Individuals involved in criminal street gangs utilize various means and
14 instruments to recruit perspective members, communicate with established associates, and to promote
15 and further their criminal activities. These means include those that are considered traditional:
16 graffiti / tagging, hand signs, open intimidation, etc.; as well as those more modern including, but not
17 limited to, cellular / smart phones (a platform for voice, text & instant messaging, and internet
18 access), social networking websites (i.e. Facebook, Twitter, Instagram, YouTube, etc.), and rap
19 music, which can be distributed on a much larger scale on sites such as You Tube and Sound Cloud.

20 b. Individuals involved in criminal street gangs often possess photographs or
21 digital images depicting: 1) themselves and fellow gang members posing and displaying gang hand
22 signs, 2) gang members or associates posing with weapons, 3) gang members or associates posing
23 beside vehicles, 4) gang members or associates posing at known gang-affiliated locations and
24 hangouts, and 5) gang members and associates displaying tattoos of gang affiliation. Often these
25 images are displayed on internet websites and kept for long periods of time on digital media, cell
26 phones, and computers;

1 c. Individuals involved in criminal street gangs often maintain or possess
2 knowledge of the current phone numbers, addresses, electronic mail addresses (email), social network
3 links or whereabouts of fellow gang members and or associates. Individuals involved with criminal
4 street gangs often keep lists of the gang rosters and current membership or cliques. These lists often
5 include gang member's monikers.

6 d. Individuals documented as, or associated with, criminal street gang members
7 are engaged in a variety of illegal activity and often possess weapons, including firearms and
8 ammunition to protect themselves.

9 e. Gang members often arm themselves with rifles, pistols, shotguns and other
10 dangerous weaponry. These weapons are used against rival gang members and the public at large.

11 f. Gang members commonly live in or claim particular geographical areas, which
12 they consider their territory or, "Hood." I know that it is common practice for gang members to hide
13 their weaponry and other evidence of their criminal activity at their homes, storage facilities, or safe
14 houses. I also know that gang members will hide weapons and other evidence of their criminal
15 activities in various locations within their vehicles; the glove compartment, trunk, under seats, under
16 the dashboard, in door panels, storage compartments and the engine compartment.

17 g. The majority of gang members commit a variety of crimes on behalf of the
18 gang or at the direction of the gang. These crimes are committed by the individual gang member to
19 bolster their status within the gang and elevate their status within the gang. This is behavior
20 commonly referred to as "putting in work." Gang members' ability to commit criminal acts, more
21 specifically violent criminal acts, is a cornerstone of the gang sub-culture and lifestyle. Many gang
22 members are prohibited by law from possessing firearms and ammunition. Often, the majority of
23 gang members will be prohibited from possessing firearms, these individuals will often obtain
24 firearms and other weapons illegally by obtaining stolen weapons or straw-purchased weapons.
25 These firearms are often transferred and passed from one member to another within the gang.
26 Individuals who are prohibited from possessing firearms often store them at other subjects' residences

1 to evade law enforcement detection and avoid arrest and seizure of the firearm in which often times,
2 the whole gang uses and has access to.

3 h. Gang members are often the victims of rival gang members assaults and
4 retaliatory attacks. Consequently, gang members will often arm themselves or have access to
5 firearms for defensive purposes against rival gang members. In addition to possessing these firearms
6 for defensive purposes, gang members also possess firearms to commit assaults on rival gang
7 members as well as commit crimes against citizens. These firearms are used by gang members in a
8 multitude of crimes including, robberies, carjacking's, home invasions, shootings and homicides.

9 24. This affidavit also seeks to establish probable cause to seize and search electronic
10 devices, including cellular phones, computers, tablets, and various formats of digital storage,
11 including thumb drives, hard drives, CD's DVD's associated with the target subjects and located
12 within the subject premises. As set forth herein, this investigation has utilized a wiretap on multiple
13 target subjects. All of the facilities that have been wiretapped in this investigation have been cellular
14 phones possessed by target subjects. I am aware based on my training, experience, and knowledge of
15 this investigation, that gang members and associates use their cellular phones to communicate with
16 one another about criminal activity. These communications includes calls, text messages, and the use
17 of social media applications such as Facebook and Snapchat. I am aware based on my training and
18 experience that gang members and associates will also photograph themselves with other gang
19 members and while wearing gang clothing. Additionally, gang members will photograph their
20 firearms, controlled substances, and proceeds generated from the sale of controlled substances. I am
21 aware that the above evidence is stored within the electronic memory of the cellular phone and can be
22 recovered during a search of the device. Additionally, I am aware from my training and experience
23 that photographs are often used by gang members and associates in social media post to boast of their
24 accomplishments. I am aware through conversations with other gang agents from their prior gang
25 investigations that they have conducted, that social media accounts, such as Facebook and Snapchat,
26 are most commonly accessed on a subject's cellular phone. These accounts can also be accessed from
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1 computer and tablets. Identifying and linking social media accounts to the user is an important aspect
2 of an investigation. This can be accomplished by searching a subject's cellular phone, tablet, or
3 computer. Additionally, the storage of documents, emails, login info, video and audio recordings, and
4 photographs, are commonly transferred to portable media storage, such as CD's DVD's, thumb
5 drives, hard drives, and others. Based on the above, agents seek to search electronic devices and
6 storage media recovered at the subject's premises.

7 **IV. BASIS FOR FACTS CONTAINED IN THIS AFFIDAVIT**

8 25. I am familiar with the facts and circumstances described herein and make this affidavit
9 based upon personal knowledge derived from my participation in this investigation and upon
10 information I believe to be reliable from the following sources:

11 a. My training and experience investigating narcotics traffickers, gangs, and
12 firearms traffickers, which includes my discussions with more experienced narcotics and gang
13 investigators;

14 b. Oral and written reports about this investigation and other investigations,
15 which I have received from other members of the FBI, the BPD, as well as other federal agents and
16 state law enforcement agencies;

17 c. Physical surveillance conducted by the FBI, BPD, the California Department
18 of Justice ("CalDOJ") and other law enforcement agencies in this and other investigations, which
19 have been reported to me either directly or indirectly;

20 d. Intercepted communications made pursuant to prior court orders;

21 e. Confidential source statements;

22 f. Witness statements

23 g. Pen register and trap and trace information, telephone toll records, and
24 subscriber information;

25 h. Public records;

26 i. Law enforcement databases; and

1 j. Evidence gathered through other law enforcement investigations.

2 k. Except as otherwise noted, when I assert that a statement was made, the
3 information was provided by a BPD Officer, another FBI Agent, a CalDOJ agent, another law
4 enforcement officer, or a source of information (who may have had either direct or hearsay
5 knowledge of the statement), with whom I have spoken or whose reports or statements I have
6 reviewed. Likewise, information resulting from surveillance, except where otherwise indicated, does
7 not necessarily set forth my own observations but rather has been provided directly or indirectly by
8 other law enforcement officers who conducted such surveillance.

9 l. References are made throughout this Affidavit to records and/or criminal
10 records. Whenever such reference is made, the sources consulted and referred to consists of one or
11 more of the following sources of information: California Justice Information System (CJIS), Cal-
12 Photo, California Law Enforcement Telecommunications System (CLETS), BPD, KCSD, CDC,
13 BOP, Kern County Superior Court, (KCSC), Kern County Probation Department (KCPD)
14 (hereinafter, these sources of information will be generically referred to as the "RECORD").

15 m. This affidavit is being submitted for the limited purpose of seeking
16 authorization for the above-referenced complaints, arrest warrants and search warrants. Therefore, I
17 have not set forth every fact learned during the course of this investigation. Facts not set forth herein
18 are not relied upon in reaching my conclusion that an order should be issued.

19 **V. STATEMENT OF PROBABLE CAUSE**

20 **A. Introduction**

21 26. In or around March of 2017, the FBI in Bakersfield initiated an investigation of the
22 WSC. The BPD had been investigating the WSC due to the February 23, 2017 drive-by shooting
23 death of five-year-old K.G. The BPD identified two WSC members as possible suspects of the
24 shooting. From late April until late May 2017, BPD conducted a state wiretap investigation of
25 Augustus CRAWFORD and his telephone number 661-472-4780 (TT#1). Through the state wiretap
26 ("17-04") WSC members were intercepted speaking of gang violence, gang politics, gang
27

1 disciplining, home burglary, the movement of firearms, promethazine with codeine sales, prescription
2 pill sales, and crack cocaine sales. The FBI Bakersfield conducted an exhaustive investigation
3 ultimately leading to a Federal Title III investigation. On September 26, 2017, the Honorable U.S.
4 District Court Judge Dale A. Drozd signed an order (1:17-SW-306 DAD) authorizing the interception
5 of telephonic and electronic communications of various WSC members including Augustus
6 CRAWFORD (TT#1), William THOMAS (TT#3), and Tommie THOMAS (TT#5) for various
7 offenses including federal narcotics trafficking violations, federal firearms violations, federal
8 gambling violations and violations of 18 U.S.C. § 1962(c),(d) (Racketeer Influenced and Corrupt
9 Organizations/Conspiracy). T.THOMAS, however, had ceased the use of TT#5 once upon
10 interception. Investigators from the FBI, CalDOJ, and the BPD working jointly intercepted
11 communications related to speaking of gang violence, gang politics, gang disciplining, home
12 burglary, the movement of firearms, promethazine with codeine sales, prescription pill sales, crack
13 cocaine sales, and methamphetamine trafficking. Additionally, investigators identified probable
14 cause for multiple new target subjects and their telephones.

15 27. On October 30, 2017, the Honorable U.S. District Court Judge Dale A. Drozd signed
16 an order (1:17-SW-306(A) DAD) re-authorizing the interception of telephonic and electronic
17 communications of various WSC members including CRAWFORD (TT#1) and W.THOMAS
18 (TT#3). In the same order, Judge Drozd authorized Title III interception for new target telephones
19 used by other WSC members and associates including Larry THOMAS (TT#7), Danny WILLIS
20 (TT#8), the user of TT#9, later identified as the phone for WSC Paul DEAN), E.C. (TT#10),
21 Ladaireus JONES (TT#15), and J.W. (TT#16) for various offenses including federal narcotics
22 trafficking violations, federal firearms violations, federal gambling violations and violations of 18
23 U.S.C. § 1962(c),(d) (Racketeer Influenced and Corrupt Organizations/Conspiracy). As a result of
24 interceptions over the aforementioned target telephones, investigators were able to gather further
25 evidence of WSC illegal activities that are detailed herein.

1 In recent years, this gang violence has made its way outside the traditional boundaries of the gangs
2 involved. Today, Crip gang members can be found throughout the greater Bakersfield area with
3 concentrations in a few specific neighborhoods. This leads to additional gang conflicts in the struggle
4 to obtain and/or hold territories for the sale of narcotics and for the establishment of the gang's
5 presence and power in a specific area. The level of gang violence has increased over recent years.
6 These crimes are taking place in public locations that place the citizens of Bakersfield at great risk.
7 These violent crimes frequently go unsolved as witnesses fear gang retaliation and refuse to
8 cooperate. The use of Confidential Reliable Informants ("CRI's") is often not feasible for criminal
9 prosecution as CRI's will generally not testify in court for fear of retaliation.

10 33. Various Crip gangs in the Kern County area, including the WSC, have been engaged
11 in residential burglaries and other property crimes. These gang members will burglarize homes in
12 order to procure firearms that are used to commit assaults, robberies and murders. Gang members
13 who commit burglaries will sell or trade items of value to further the gang and its criminal lifestyle.

14 34. Crip gangs are heavily involved in narcotics sales within the City of Bakersfield.
15 WSC members traffic narcotics both as individuals and under the larger umbrella of their criminal
16 street gang. Within the traditional boundaries of the WSC-claimed area are locations of high
17 narcotics activity and its correlated crimes of violence and theft.

18 35. The WSC is a criminal street gang as defined in California Penal Code § 186.22(f), in
19 that they are all comprised of more than three members; engage in the commission of one or more
20 criminal acts listed in PC § 186.22(e) as a primary activity; have a common name, sign or symbol;
21 and members, both individually and collectively, engage in, or have engaged in, an ongoing pattern of
22 criminal gang activity that is common knowledge to the members of these gangs. Consequently,
23 there is probable cause to believe that the WSC is an "association-in-fact enterprise" as set forth in
24 U.S.C. § 1961(4).

25 36. The WSC was formed, at least in part, as a way to protect its members from other
26 gangs in Bakersfield. Over the years, this purpose has grown in scope, so that the core objective of
27

1 protecting the WSC territory has changed to encompass, among other things, drug trafficking, gun
2 trafficking, armed robbery, and murder.

3 37. The WSC gang is generally only open to membership by African-American males.

4 38. The WSC has over 100 members and/or affiliates in Kern County from different
5 subsets and cliques. WSC members have engaged in crimes for the benefit of the gang. The primary
6 activities of the WSC include murder, assault with a deadly weapon, intimidation of victims and
7 witnesses, robbery, criminal threats, property crimes and possession for sale and manufacturing of
8 controlled substances, as defined in 21 U.S.C. § 841(a)(1).

9 39. WSC members hold an annual celebration on June 6th which they refer to as “Hood
10 Day” at which they celebrate their gang and recognize deceased/incarcerated members.

11 40. WSC members also have various ad hoc meetings, which often occur at Lowell Park,
12 which is within the traditional boundaries of the WSC. Law enforcement surveillance teams have
13 seen multiple known WSC members gathered at Lowell Park on many occasions over the past several
14 years.

15 41. WSC members are aware of the WSC’s criminal activities and generally have
16 knowledge as to which members have committed certain crimes.

17 42. The WSC has a system of hierarchy wherein certain members have certain amounts of
18 authority and fulfill a role within the criminal organization.

19 43. The WSC utilizes cellular telephones for communication within the gang in order to
20 organize and plan the gang’s criminal activities, e.g., gang meetings, plan assaults, drug sales, etc.

21 44. Many WSC members represent the gang and their membership therein through tattoos,
22 e.g., “ESK” (East Side Killer), “WSC” (West Side Crip), “BK” (Blood Killer), “WS” (West Side),
23 “6” (6th Street), “CT” (Carnation Tract), “TG” (Turc Gunna).

24 45. The WSC generally identify one another through the use of hand gestures or “gang
25 signs.” They typically display the letters W-S, or W-S-C. Specific subsets of the WSC have
26 additional identifying letters, 6 (6th Street subset), C-T (Carnation Tract subset), V-A-N-S M-O-B
27
28

1 (Vicious Ass Niggas Steady Maccin on Bitches subset), Turq Rag (Turquoise Rag subset).

2 46. WSC members frequently wear the baseball cap of the Washington Nationals, whose
3 team insignia includes a “W” (for WSC). WSC members typically wear clothing that is turquoise in
4 color, as turquoise is the color identifier of the WSC. WSC members will often wear Minnesota
5 Twins apparel, whose logo is “C-T,” for the Carnation Tract subset. WSC members associated with
6 the 6th Street subset will often be in possession of black or navy blue articles of clothing.

7 47. The WSC sometimes uses graffiti to mark its territorial boundaries and threaten rival
8 gang members. I learned through my conversations with a BPD detective that on February 20, 2014,
9 a large amount of graffiti was observed at the 300 block of V Street. Graffiti was present that depicted
10 “805 WSC” as well as “WWLP” crossed out with the same color spray paint that wrote “805 WSC.”
11 “WWLP” stands for “Westside Warlord Piru” a rival street gang affiliated with the Bloods gang. A
12 well-documented Blood member had recently been killed during a gang-related shooting by a WSC
13 member (BPD Report 13-242715). Crossing out a rival gang’s graffiti is a sign of disrespect.

14 48. There are high-ranking WSC members who are currently incarcerated but still have a
15 communication link with their criminal organization through cellular telephones smuggled into
16 prison, letters and personal contact or couriers. These “Shot Callers” continue to provide direction
17 and leadership to the WSC. There are active Shot Callers who are not incarcerated. Shot Callers call
18 gang meetings, control the money, order assaults, discipline within the gang. Shot Callers essentially
19 oversee criminal activity.

20 49. WSC members may have particular duties, e.g., shooters who are directed and/or take
21 it upon themselves to assault rival gang members; members who commit burglaries in order to obtain
22 firearms, electronics, jewelry and cash; members who sell and distribute narcotics for the steady
23 income the gang relies on to continue the gangster lifestyle. These members use cellular telephones
24 during both the planning and the actual execution stage of the crimes they commit.

25 50. The alliance between WSC and Country Boy Crips (hereafter the “CBC”) gang
26 members has existed since the early 1990s, after a shooting by East Side Crip (hereafter “ESC”)

1 members that struck both gangs' members at Casa Loma Park in Bakersfield. The alliance is
2 primarily due to the smaller numbers of the CBC and WSC compared to their rival, the ESC. For
3 example, on March 28, 2015, Det. Pair conducted surveillance of the funeral for WSC Michael "Mike
4 Mike" Whatley. Det. Pair observed WSC members attending the funeral for Michael Whatley.
5 During the surveillance, Det. Pair also observed three CBC members in attendance.

6 51. The WSC has rivals throughout Bakersfield, the most prominent being the East Side
7 Crips ("ESC"). In an ongoing effort to assert dominance and power over rival gangs, WSC members
8 are encouraged to engage in shootings, beatings and murder directed at the members of the rival street
9 gangs.

10 52. The WSC are involved in bulk shipments of methamphetamine to North Dakota.

11 53. Members of the WSC have operated an illegal gambling location in Bakersfield where
12 drugs were being sold and guns were reportedly present.

13 54. The FBI has also received information about the WSC from Confidential Reliable
14 Informant #1 ("CRI#1").¹ CRI#1 is jointly operated by both BPD and the FBI. CRI#1 began

15
16 ¹ Upon his/her arrest for the cocaine base for sales crime, BPD Officer Skidmore reported that CRI#1
17 stated that documented WSC member Augustus CRAWFORD was acting as his/her "lookout" during
18 the sales of cocaine base and that CRI#1 needs permission or has to pay money to WSC members to
19 sell narcotics within their boundaries. CRI#1 later denied making these statements. On April 2, 2017,
20 Det. Diederich debriefed CRI#1 after CRI#1 participated in a controlled purchase of a schedule II
21 prescription narcotic ("Norcos") from CRAWFORD. CRI#1 advised that he/she traveled with
22 CRAWFORD, during which time CRAWFORD contacted several subjects in an effort to sell a bottle
23 of "lean." Based on my training and experience, "lean" is slang for Promethazine with Codeine, a
24 controlled substance. Since becoming a confidential source, CRI#1 has been intercepted pursuant to
25 the aforementioned state wiretap (which CRI#1 was not aware of). On 4/22/2017, CRI#1 contacted
26 CRAWFORD with no directive to do so by law enforcement. CRI#1 advised that he/she was
27 involved in an altercation and feared the subject was going to get a firearm. CRI#1 requested that
28 CRAWFORD pick them up. CRI#1 told CRAWFORD that the subject in the altercation was
assaulted by an associate of CRI#1. CRI#1 asked CRAWFORD who he was with and CRAWFORD
told him/her that he was with the same "guy that they sold lean." The timeline for this purported sale
of lean is unknown. On 5/4/2017, CRAWFORD contacted CRI#1. CRAWFORD told CRI#1 that
he has over an ounce of some "soft" and he can give him a deal, "33 grams for a rack." Based upon
my training and experience, I recognize that the term soft as used in this context to be consistent with
powder cocaine and "rack" to mean firearm. CRI#1 declined, stating he has "a lot" already and does
not want anymore. On 5/10/2017, CRI#1 contacted CRAWFORD with no directive by law
enforcement. CRI#1 told CRAWFORD to give him five minutes because he is wrapping up a
"cook." CRAWFORD asked CRI#1 if he is at his room and CRI#1 said he is, but he's doing some

1 cooperating with BPD in March 2017. With BPD, CRI#1 is receiving consideration on a pending
2 H&S § 11351.5, possession of cocaine base for sales charge. CRI#1 has a prior conviction for human
3 trafficking. CRI#1 has received a small amount of monetary compensation for food and lodging
4 during the course of his/her cooperation with BPD. CRI#1 is working for monetary compensation
5 with the FBI. CRI#1 is not a member of the WSC. CRI#1 has agreed to testify as part of his/her
6 cooperation agreement. CRI#1 has provided information that has been corroborated by law

7
8 other shit so he doesn't want CRAWFORD coming to the room in his vehicle. CRAWFORD told
9 CRI#1 he is in a different car. Based upon my training and experience, I recognize that the term
10 "cook" as used in this context can be consistent with the manufacturing of a controlled substance,
11 namely cocaine base. CRI#1 was not debriefed regarding these calls, as based upon my training and
12 experience, this may divulge to CRI#1 the nature of this wire interception. CRI#1 to date has not
13 provided law enforcement with any information regarding these incidents. On 08/11/2017, CRI#1
14 stated he/she observed WSC member Bennie SCOBNEY conduct a drug deal with a white couple in a
15 black Dodge truck at a known WSC gathering place. Agents later reviewed pole camera footage that
16 showed that SCOBNEY entered CRI#1's vehicle on the same date and in the same area. On
17 08/14/2017, agents asked CRI#1 if he/she transported SCOBNEY on 08/11/2017 to the aforementioned
18 drug transaction. CRI#1 acknowledged he/she provided transportation, but did not take part in the
19 actual transaction. CRI#1 believed it would have been suspicious if CRI#1 did not provide a ride as
20 requested by SCOBNEY on 08/11/2017. I believe that CRI#1 was not the originator of the 08/11/2017
21 drug transaction and only provided a ride to SCOBNEY because it was expected of CRI#1. Agents
22 admonished CRI#1, explaining that he/she must provide full and complete information in the
23 future. CRI#1 was later intercepted discussing with CRAWFORD, using TT#1, prices and locations to
24 meet in order to complete a gun buy. Agents spoke with CRI#1 on October 6, 2017 and advised
25 CRI#1 of the FBI confidential human source requirements at which time CRI#1 admitted to
26 purchasing a handgun from CRAWFORD for \$450.00. CRI#1 explained that CRI#1 felt the need to
27 purchase the handgun for protection. CRI#1 explained that he/she felt the need to purchase the
28 handgun due to his/her repeated interactions with WSC members while working as an informant.
Agents again admonished CRI#1, explaining that CRI#1 was a felon and could not possess a
handgun. CRI#1 then retrieved the handgun in which he/she purchased from CRAWFORD and gave
it to your Affiant. Thereafter, on October 10, 2017, two calls were intercepted between
CRAWFORD's TT#1 and CRI#1. After a subsequent review of the intercepted conversations, your
Affiant believes that CRAWFORD acquired marijuana plants that CRI#1 has in his/her possession.
During the conversations, it sounds as if CRAWFORD has tasked CRI#1 with drying the plants.
During another intercepted conversation between CRAWFORD and CRI#1 on 10/11/2017,
CRAWFORD indicated to CRI#1 that he needs to acquire the marijuana from CRI#1 to "trim" the
"weed". Based on social media postings by CRAWFORD that law enforcement reviewed, it appears
that CRAWFORD may have originally stolen this marijuana. It is unknown if CRI#1 participated in
the theft. On November 29, 2017, CRI#1 was arrested by the BPD for unlawful possession of two
firearms. CRI#1 agreed to speak with agents after his/her arrest and stated that he/she was paid by
another individual to hold the firearms. While I believe that CRI#1 has not kept law enforcement
apprised of all of his/her contacts with CRAWFORD and his/her illegal possession of firearms, I
believe that the information that CRI#1 has provided about the WSC remains reliable because it has
been corroborated at least in part by my training and experience with the WSC, as well as the training
and experience of other officers familiar with the WSC, conversations intercepted over the
aforementioned wiretap, and recorded controlled purchases.

1 enforcement through surveillance, controlled purchases of narcotics and a consensually monitored
2 phone call. Consequently, I believe CRI#1 to be reliable. CRI#1 is personally familiar with some of
3 the Target Subjects and their criminal activities. The following is a summary of the information
4 provided by CRI#1:

5 a. CRI#1 was actively involved in the sales of cocaine base. CRI#1 denied
6 telling officers that he must pay to sell drugs in WSC territory. CRI#1 explained that there is a
7 benefit to having a WSC with her/him when selling drugs, as other WSC members won't mess with
8 him/her; however it also "puts a target" on CRI#1's back for rival gang members.

9 b. CRI#1 first advised the WSC is organized into various groups. CRI#1
10 identified the following as subset groups of the WSC: "Turq," "Carnation Tract" or "CT," "Black
11 Rag," "Goochies," and "6th Street."

12 c. CRI#1 advised that H.N., J.K.'s mother runs the WSC. He/she advised that
13 J.K.'s family has the money and influence.

14 d. CRI#1 advised that after the murder of K.G., CRAWFORD told CRI#1 that the
15 three "Mice" did the shooting. (I know that certain members of the WSC have a moniker that
16 includes the word "mice").

17 e. CRI#1 advised that he/she transported CRAWFORD to a meeting after the
18 murder of five-year-old K.G. The meeting was at an unknown residence, possibly related to W.
19 THOMAS , aka "Sprout" on Terrace way. CRI#1 advised that since CRI#1 is not a WSC, CRI#1 did
20 not go to the meeting. After the meeting, CRAWFORD said that "they" talked about burning the
21 gun. CRI#1 believed this referred to the firearm used to kill K.G.

22 f. J.T. is an "OG" and can run things in the WSC.

23 55. CRI#1 was shown a series of photographs of suspected WSC members. The
24 photographs were obtained from prior booking photos and California Department of Motor Vehicle
25 driver's license photo. CRI#1 identified the following subjects among several others known to
26 him/her, unless otherwise noted CRI#1 only identified the subjects by the moniker provided:

1 a. Larry THOMAS - "TG" or "Turq Gunna," Possibly drives a Black Nissan
2 vehicle

3 b. William THOMAS - Sells crack "Sprout" or "Big Guy." He runs the WSC
4 casino and sells drugs.

5 c. Ladaireus JONES - "LD," He received \$10,000 from D.W. after D.W.
6 burglarized a house with a large amount of cash.

7 d. Augustus CRAWFORD - "AJ," He drives a black Volkswagon sedan. He
8 robbed a store wearing a straw hat and is friends with Tommie THOMAS, aka "Tap"

9 **C. Target Subjects' Criminal Histories, Roles in the WSC, Residences and Phones**

10 56. In addition to a description of the Target Subjects' criminal history and role in the
11 WSC, each of the Target Subject paragraphs below set forth probable cause to believe that the Target
12 Subjects reside at or otherwise store evidence of crimes at the locations for which I am requesting
13 search warrants. Additionally, these paragraphs provide probable cause to believe that these
14 individuals are using the particular telephone that I have identified as their phone. Furthermore,
15 based on my knowledge of intercepted calls during gang wiretaps, and conversations with gang
16 members, as well as based on my training and experience working gang-related investigations, I
17 know gang members will maintain multiple residences. This is done for a variety of reasons. Gang
18 members are aware they are often the subjects of criminal investigations and that law enforcement
19 maintains records of where they reside. For this reason, gang members will often live at one location,
20 but regularly frequent another location where they can store contraband, such as firearms or
21 controlled substances to protect the contraband from rival gang members and law enforcement. I
22 have found that many times their primary residences, and where they often sleep at night, are locations
23 associated with the residence where they grew up (family residence), the residence they have listed on
24 the driver's license, the residence they have listed with probation or parole, and the residence they
25 provide to police during law enforcement contacts. Conversely, I have found that many times, the
26 secondary location is the residence of a girlfriend, the mother of child in common, or another
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28

1 associate. I have found this is true in the current investigation. Many of the target subjects in this
2 investigation have multiple locations with which they are associated. Many of them regularly sleep at
3 one location at night, but during the day spend a significant amount of time at another location.
4 Based on my training and experience, I believe evidence of their criminal activity will be found at
5 both their primary and secondary locations. I believe this to be true because of my knowledge of the
6 gang sub-culture as well as my knowledge of this investigation. I know from my training and
7 experience that gang membership is inherently violent and therefore, many gang members will keep
8 firearms in their possession for their protection, regardless of where they go. Many of the target
9 subjects in this investigation are also involved with drug trafficking. Another aspect of gang
10 membership is the constant threat of robbery from rival gang members of the drug supply of proceeds
11 thereof. Because of this threat, gang members will often times keep in their possession the drug
12 supply and the proceeds of drug sales. Based on this, for the target subjects referenced herein, who
13 have been identified as being associated with multiple locations, I believe evidence of their criminal
14 activity will be located at both locations that I have established as their residences.

15 57. The targets listed below have been identified from the following information sources
16 and criminal indices: the California Department of Motor Vehicles (“DMV”); the California Law
17 Enforcement Teletype System (“CLETS”); the National Crime Information Center (“NCIC”); DEA,
18 FBI, and BPD’s Records Management System (RMS); physical surveillance; conversations with
19 other agents and officers participating in the investigation; and my own participation in the
20 investigation:

21 58. **William THOMAS**, aka “Sprout,” aka “Big Guy,” is believed to be, based on BPD’s
22 investigation, a higher-ranking member of the WSC. W.THOMAS is considered an “OG” (original
23 gangster) within the structure of the WSC. W.THOMAS is a documented member of the WSC. As
24 referenced, BPD street check 17-1164, on February 21, 2017, BPD Officers contact W.THOMAS and
25 another WSC member in the 100 block of E California Av. Both are identified as WSC members.
26 W.THOMAS is observed wearing a Turquoise jacket, a primary color of the WSC. As referenced, in
27
28

1 BPD street check narrative 16-1183, on February 14, 2016, BPD Officers contact W.THOMAS,
2 Edward Leach and Brian Dickerson during a traffic stop in the 300 block of Brundage Lane, which is
3 within traditional WSC territory. W.THOMAS and Edward Leach are both documented WSC
4 members. Brian Dickerson is a documented Country Boy Crips (“CBC”) member. As discussed
5 further below, the WSC and CBC are allies against the East Side Crips (“ESC”) and are frequently
6 contacted together. As referenced, in BPD report 15-180483, on August 08, 2015, BPD Officers
7 observe W.THOMAS as the driver of a vehicle leaving the parking lot of 1701 Brundage Lane,
8 AMPM, a WSC hangout. W.THOMAS was identified as a WSC member. As referenced, in BPD
9 report 15-86289, on April 15, 2015, BPD Officers conduct surveillance of the funeral service for
10 Michael Whatley, a well-known WSC who was killed by an ESC member. W.THOMAS was
11 observed with numerous other WSC members at the funeral. Additionally, the RECORD reflects that
12 W.THOMAS has claimed membership as a Crip during 14 of his bookings into the KCSD downtown
13 central receiving facility.

14 a. W.THOMAS has sustained the following convictions and/or arrests: juvenile arrest
15 for assault with a deadly weapon/not firearm/bodily injury likely (October 1998); juvenile arrest for
16 second degree burglary (April 1999); juvenile arrest for second degree burglary (May 1999); juvenile
17 arrest for receiving stolen property, burglary, and conspiracy (June 2000); arrest for participation in a
18 criminal street gang, possession/purchase of cocaine base for sale, conspiracy to commit a crime,
19 altercation harm public safety officer (March 2001); conviction for receiving known stolen property
20 (April 2001); arrest for second degree robbery, conspiracy (September 2001); arrest for probation
21 violation (February 2002); conviction for reckless driving, driving on a suspended license (November
22 2002); arrest for possession or bringing weapon in courthouse, possession of teargas (January 2003);
23 conviction for felon entering reformatory/night (February 2002); conviction for failure to appear on
24 written promise, failure to provide financial responsibility, driving on suspended license (February
25 2002); arrest for probation violation April 2003); arrest for fighting in public place (June 2003);
26 conviction for maintaining a residence for sales of controlled substance (September 2003); arrest for

1 violation of parole (August 2004); arrest for violation of parole (August 2005); arrest for violation of
2 parole (December 2007); arrest for criminal street gang, accessory, obstructing a public officer
3 (February 2002); conviction for possession/purchase of cocaine base for sale (March 2011); arrest for
4 concealed weapon in vehicle with prior felon, gang member carrying loaded firearm, participation in
5 street gang, prohibited gang member own/etc ammo (December 2013). Based on my review rap
6 sheets and/or conviction documents, I know that one or more of these convictions was for a crime
7 punishable by imprisonment for a term exceeding one year. Consequently, it is a violation of 18
8 U.S.C. § 922(g)(1) for W.THOMAS to possess any firearm or ammunition which has been shipped or
9 transported in interstate/foreign commerce.

10 b. Based on the current investigation, it is believed that W.THOMAS resides at 409
11 Stephens Drive, Apartment #9, Bakersfield, CA. On October 23, 2017, in text #4394, intercepted over
12 TT#3, W. THOMAS provided his address of 409 Stephens. On 9/7/17 agents conducted surveillance
13 in the area to identify W.THOMAS's exact residence. Surveillance observed a 2008 red Chevrolet
14 Impala bearing CA license plate 6XZU252² at the apartment complex. On 10/25/17, during a
15 controlled purchase from W. THOMAS, surveillance agents observed W.THOMAS³ driving the red
16 Chevrolet Impala with CA license plate 6XZU252 from the controlled buy back to the area of 409
17 Stephens Drive. Officer Sanchez, who was in the area on foot, observed W.THOMAS enter
18 apartment #9. Officer Sanchez observed W. THOMAS, who was with two children, enter the
19 apartment after the children and then shut the door behind him. Additionally, agents are obtaining
20 precision location information (GPS pings) for TT3, used by W. THOMAS. Although the GPS pings
21 have a large radius, the GPS pings cover the area of 409 Stephens Drive. W.THOMAS's CA driver's
22 license number D3037828 reflects an address of 4428 White Lane, Apt.A, Bakersfield, CA.

23 According to the open source records database Clear, as of August 10, 2017, 4428 White Lane #A,
24 _____

25 ² According to DMV records, this vehicle is registered to Perez Carlos, 9226 Burke St, Apt. 5, Pico
26 Rivera.

27 ³ SAS Johnston observed the driver of the red Chevy Impala, CA# 6XZU252, and positively
28 identified him as William THOMAS based upon a DMV photograph.

1 Bakersfield, CA, was listed as a utility listing, phone record, and household listing for W. THOMAS.
2 Nevertheless, for the reasons stated above, I believe that W.THOMAS resides at 409 Stephens Drive,
3 Apartment #9.

4 c. The investigative team confirmed W.THOMAS was the user of TT#3, (661) 535-
5 9143. On September 11, 2017, a ruse call was placed to TT3 by SA Pacheco. During this call, SAS
6 Johnston observed W.THOMAS answer the phone and speak with SA Pacheco, thus confirming that
7 W.THOMAS is the user of the cellular phone. W. THOMAS has been identified by his moniker in
8 multiple intercepted text messages. In text #13, #202 and #1229, intercepted over TT#3, W.
9 THOMAS was referred to as "Big guy." In text #865, intercepted over TT#3, W. THOMAS was
10 referred to as "Sproutness." In text #1051, intercepted over TT#3, W. THOMAS was referred to as
11 "William." In call #2190, intercepted over TT#3, W. THOMAS identifies himself as "William." In
12 text 4555 on TT#3, THOMAS identifies himself as "Sprout." Additionally, CRI#1 identified TT#3
13 as W.THOMAS's and stated that he/she has spoken with W.THOMAS on the same number several
14 times.

15 59. **Tommie THOMAS**, aka "Tapp," aka "Lil Cool" is believed to be, based on my
16 knowledge of the current investigation and my knowledge of the WSC, a higher ranking member of
17 the WSC's. T.THOMAS is also a documented member of the WSC's. As referenced, in BPD street
18 check 17-906, on February 07, 2016, BPD Officers identify T.THOMAS with Bennie SCOBEY,
19 another WSC member, in the 200 block of South H Street, which is within WSC territory. As
20 referenced, in BPD street check 16-5646, on August 23, 2016, BPD Officers contact T.THOMAS
21 during a traffic enforcement stop in the 200 block of T Street, which is within WSC territory.
22 T.THOMAS admitted to being a WSC member. As referenced in BPD street check 16-4925, on July
23 20, 2016, BPD Officers contact T.THOMAS in the 1700 block of Palm Street, T. THOMAS again
24 admitted to be a WSC gang member.

25 a. I have reviewed criminal history records and learned T. THOMAS has an extensive
26 criminal history. In March 2000, T.THOMAS, was arrested by BPD in Bakersfield, CA, for
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1 possession for sales of cocaine base. In October 2000, T.THOMAS, was arrested by BPD in
2 Bakersfield, CA for being under the influence of a controlled substance and in November 2000 the
3 proceeding was suspended in drug court. In January 2001, T. THOMAS, was arrested by BPD in
4 Bakersfield, CA for being a gang member in possession of a firearm, participating in a criminal street
5 gang, carrying a concealed loaded firearm, prowling and possession of a firearm by a prohibited
6 person. In April 2001, T. THOMAS, was arrested by BPD in Bakersfield, CA for battery on a person
7 and in June 2001, was convicted and sentenced to 6 days in jail and 36 months probation. In May
8 2001, T. THOMAS, was arrested by BPD in Bakersfield, CA for participation in a criminal street
9 gang, murder, conspiracy to commit a crime and carrying a loaded firearm in a public place and in
10 June 2001 all charges were dismissed by the prosecutor due to lack of sufficient evidence. In July
11 2001, T. THOMAS, was arrested by BPD in Bakersfield, CA for possession of cocaine base for sale,
12 participation in a criminal street gang, conspiracy to commit a crime and obstruct/ resist a public
13 official and in July 2001 the charges of obstruct/ resist a public official and possession of cocaine
14 base for sale were dismissed in the furtherance of justice. In April 2002, T. THOMAS, was arrested
15 by Las Vegas Metropolitan Police Department (LVMPD) in Las Vegas, NV for arrange to sell a
16 controlled substance and in February 2003 was convicted of misdemeanor drug possession. In June
17 2002, T. THOMAS, was arrested by BPD in Bakersfield, CA for receiving stolen property, vehicle
18 theft and driving without a license and in June 2002 all charges were dropped. Also in June 2002, T.
19 THOMAS, was arrested by BPD in Bakersfield, CA for participation in a criminal street gang,
20 possession of cocaine base for sale, obstruct/ resist a public official, destroy/ conceal evidence and
21 driving without a license and in September 2002, was convicted of possession of cocaine base for
22 sales and sentenced to 4 years in prison. The other charges were dismissed. In February 2005, T.
23 THOMAS, was arrested by BPD in Bakersfield, CA for a violation of parole. In June 2005, T.
24 THOMAS, was arrested by BPD in Bakersfield, CA for loitering in a place with drug activity and
25 driving without a license and a parole violation and in December 2005 was convicted of driving
26 without a license and sentenced to 37 days in jail. In August 2005 T. THOMAS, was arrested for a
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1 violation of parole by BPD in Bakersfield, CA and in December 2005 was sentenced to complete his
2 full prison sentence. In September 2006, T. THOMAS, was arrested by BPD in Bakersfield, CA for
3 transportation of a controlled substance, possession of cocaine base for sale, obstruct/ resist a public
4 official, participation in a criminal street gang and a parole violation and in November 2006, was
5 convicted of possession of cocaine base for sale and sentenced to 5 years in prison. In May 2009, T.
6 THOMAS, was arrested by BPD in Bakersfield, CA for a violation of parole and in June 2009
7 sentenced to complete his full prison sentence. In December 2009, T. THOMAS, was arrested by
8 BPD in Bakersfield, CA for possession of cocaine base for sale, conspiracy to commit a crime,
9 participation in a criminal street gang and a parole violation and in April 2010 was convicted of
10 possession of cocaine base for sale and sentenced to 5 years in prison. In November 2013, T.
11 THOMAS, was arrested by BPD in Bakersfield, CA for domestic violence, criminal street gang
12 member carrying a concealed weapon, possession of a firearm by a felon, receiving stolen property,
13 participation in a criminal street gang, evading a peace officer without regard for public safety and
14 obstruct/ resist a public official and in November 2013 was convicted of evading a peace officer
15 without regard for public safety and was sentenced to 28 months in prison. Based on my review rap
16 sheets and/or conviction documents, I know that one or more of these convictions was for a crime
17 punishable by imprisonment for a term exceeding one year. Consequently, it is a violation of 18
18 U.S.C. § 922(g)(1) for T.THOMAS to possess any firearm or ammunition which has been shipped or
19 transported in interstate/foreign commerce.

20 b. Agents believe T. THOMAS also resides at 3030 Verde Street Apartment 19, with K.
21 PIERSON, who agents have identified in this investigation as his girlfriend.⁴ During the
22 investigation, surveillance has seen T. THOMAS at 3030 Verde Street #19, at least three times. The

23 _____
24 ⁴ A DMV records check revealed as of March 2017, 204 Donna Avenue, Bakersfield, CA was the
25 mailing address of T.THOMAS. As of 11/17/17, open source records checks reveal T.THOMAS's
26 sister and brother to have established utilities at 204 Donna Avenue, Bakersfield, CA. According to
27 BPD reports, T. THOMAS was contacted at the residence in December 2015 during a probation
28 search. While this may be a secondary residence for T.THOMAS, I believe he also resides at the
3030 Verde address.

1 last time T. THOMAS was seen at the apartment was November 3, 2017, following the controlled
2 purchase of methamphetamine by a CHS. On that date, surveillance observed CRAWFORD and T.
3 THOMAS drive to the apartment complex, but did not see either of them go inside the apartment.
4 Also on November 3, 2017, T.THOMAS, using CRAWFORD's phone (TT#1), called K. PIERSON
5 and asked if the apartment key was on the key ring. K.PIERSON replied that she had them. As the
6 two are about to end the call, T.THOMAS could be overheard stating "damn, I need to get this stuff
7 in the apartment."

8 c. Agents identified phone number (701) 240-2787 as a phone number used by T.
9 THOMAS. On 11/1/17, W.THOMAS, using TT#3, made an outgoing call to an unknown male at
10 phone number (661) 390-5586. During the conversation, W.THOMAS said he would give the UM,
11 "Tapps number". As noted above, "Tapp" is the moniker for T. THOMAS. W.THOMAS gave
12 "Tapps" phone number as "701-240-2787." Additionally, this number was intercepted multiple times
13 during the wiretap investigation. Through these intercepted calls, I recognized the voice of
14 T.THOMAS⁵. T. THOMAS was also identified as the user of phone number (701) 389-1722. FBI
15 Agent Chris Cantrell was able to identify T. THOMAS voice and determined that T. THOMAS was
16 the user of cellular phone number (701) 389-1722.

17 60. **Danny WILLIS** aka "Chocolate Drop" or "Drop," is a middle-ranking member of the
18 WSC. As referenced in BPD report 17-283703, WILLIS was contacted by BPD officers loitering
19 with WSC members, within the WSC traditional boundaries. Upon contact, WILLIS fled from
20 officers. Officers searched the area where WILLIS and the additional WSC members were loitering
21 and located stolen firearms. WILLIS was later located and arrested for various violations including
22 PC 186.22(a)(Participation In A Criminal Street Gang) and PC 25850(c)(3)(Gang Member In
23 Possession Of Firearm) and PC 29800(a)(1)(Felon In Possession Of A Firearm). As referenced in
24 BPD street check 17-3458, 16-5665, and 16-3118, WILLIS was contacted with WSC members,
25 within WSC territory, and has admitted being a WSC.

26
27 ⁵ I am familiar with the voice of T. THOMAS through the BPD 17-04 wiretap investigation.

1 a. I reviewed criminal history records and learned WILLIS has sustained the following
2 convictions and/or arrest: Assault with a Deadly Weapon with Force: Possible GBI (September
3 2015); Inflicting Corporal Injury: Spouse/Cohab/Date (September 2015); Receiving/ETCC Known
4 Stolen Property (September 2016); Prohibited OWN/ETC Firearm:Spec (September 2016);
5 Prohibited OWN/ETC AMMO (September 2016); Felon Addict Possession/ETC Firearm (September
6 2016); Carry Loaded Firearm (September 2016); Carry Loaded Firearm: Gang Member (September
7 2016); Obstruction/ETC Public Officer/ETC (September 2016); Participating in Criminal Street Gang
8 (September 2016); Carrying Loaded Firearm: Public Place (September 2016); Convicted Person
9 Possession/ETC Firearm: Under 30 (September 2016); Illegally Possession any Assault Weapon
10 (September 2016); Convicted Person Possession/ETC Firearm: Restriction (September 2016);
11 Conspiracy: Commit Crime (September 2016); Inflicting Corporal Injury: Spouse/Cohab (September
12 2016). Based on my review rap sheets and/or conviction documents, I know that one or more of these
13 convictions was for a crime punishable by imprisonment for a term exceeding one year.
14 Consequently, it is a violation of 18 U.S.C. § 922(g)(1) for WILLIS to possess any firearm or
15 ammunition which has been shipped or transported in interstate/foreign commerce.

16 b. WILLIS is believed to reside at 4032 O Street, Apartment #22, Bakersfield, CA. On
17 10/8/17, CALDOJ agents conducted surveillance on WILLIS and based on a previously reviewed
18 booking photo, observed him enter and leave apartment #22 at 4032 O Street. On 11/09/17,
19 CALDOJ Agents again conducted surveillance on WILLIS and observed him, based on their training
20 and experience, completing narcotic transactions at the apartment complex located at 4032 O Street.
21 Furthermore, on November 13, 2017, during Call#5140, WILLIS tells UM337, believed to be
22 Kenneth Johnson, "I stay on 40th." UM337 replies "just hit me up with the address." In Call #5141
23 WILLIS then texted "4032 o st" to UM337. I know based on my conversations with other Agents that
24 40th Street and O Street intersect and the address to which WILLIS texts, is located on the corner of
25 this intersection. Since 11/15/17, SA Mancebo has checked GPS location pings for WILLIS at TT#8,
26 on at least 20 occasions and observed pings for TT#8 at the apartment complex of 4032 O Street,
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1 Bakersfield, CA. The pings for TT#8 appear to be in this approximate area at night and also in the
2 early morning hours. Based on this investigation it is believed WILLIS' significant other is Breyona
3 Cartwright. Open source checks revealed Breyona Cartwright, as of 11/17/17, has utilities reflecting
4 the address of 4032 O Street, Apartment #22, Bakersfield, CA. WILLIS's CA driver's license
5 number F1930714 shows WILLIS has an address of 1710 Oregon Street, Apt. C, Bakersfield, CA.

6 c. Agents believe WILLIS is the user of phone number (661) 759-0799, herein referred
7 to as TT8. On 10/7/17, WILLIS was observed by Officer Sanchez exiting a brown Buick (7ZIK502).
8 Officer Sanchez identified WILLIS from a previously reviewed booking photo. A subsequent ruse
9 call was placed to WILLIS at (661) 759-0799 by SA Pacheco, whereupon, SA Compston observed
10 WILLIS removing a phone from his pocket. WILLIS answered the phone call and had a conversation
11 with SA Pacheco. In call #904 on TT#8, WILLIS provided his full name, "DANNY WILLIS," and
12 last four of his social security number. In call #1033 on TT#8, WILLIS identified himself as, "Drop."

13 61. **Gary PIERSON** – aka "MAD," is a documented member of the WSC. As referenced
14 in BPD report 14-1886, Officer contacted G.PIERSON and T.R. at Lowell Park in the company of
15 West Side Crip gang members, during which time a loaded firearm was observed in plain view in a
16 Chevrolet Impala, which G. PIERSON was observed leaning against. As referenced in BPD report
17 2014-78, during a shooting investigation at 3510 Wible Rd (Fandango Palace.) G.PIERSON was
18 observed, via surveillance video and identified by BPD Officers, in the company of C.W and T.R.,
19 both identified as WSC. G.PIERSON admitted to Officers being present at the shooting scene and
20 discarding a firearm that he did not shoot, which video footage confirmed.

21 a. I reviewed criminal history records that revealed G. PIERSON has sustained the
22 following convictions and/or arrests: Reckless Driving:Highway (February 2000); Driving While
23 License Suspended/ETC (December 2001); False ID to Specific Peace Officer (December 2001);
24 False Information to a Peace Officer (August 2005); Driving While License Suspended/ETC (August
25 2005); Driving While License Suspended (May 2006); Failure to Appear: Written Promise (May
26 2006); Motorcycle Without Proper License (May 2009); Carry Loaded Firearm: Gang Member (April
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1 2014).

2 b. Based on information from the current investigation, it is believed G. PIERSON
3 maintains a residence at 1321 N Street, Bakersfield, CA. On October 22, 2017, SA Mancebo and
4 other Agents positively identified G.PIERSON from a previously reviewed DMV photograph and
5 observed him walk down the driveway from 1321 N Street, Bakersfield, CA. As of 5/30/17, 1321 N
6 Street is the listed DMV address for G.PIERSON on his CA driver's license number B7887721.
7 According to open source database "Clear", as of 11/17/17, G.PIERSON has utilities listed to the
8 address along with Valerie Pierson. According to the open source records database Clear, Valerie
9 Pierson is a likely relative of G. Pierson. Based on the common address history of V. Pierson and G.
10 Pierson, as well as the age of V. Pierson, I believe V. Pierson is likely the mother of G. Pierson.

11 c. Agents also confirmed G. PIERSON is the user of (661) 599-9741. During
12 surveillance on October 22, 2017, agents followed G.PIERSON from 1321 N Street while he was
13 driving a gray Buick with CA license plate 6MLN411. Officer Sanchez placed a call to cellular
14 telephone number at (661) 599-9741. Officer Sanchez then observed G.PIERSON pick up a phone
15 and speak with him, confirming his use of the phone.

16 62. **Bernard WARREN**, aka "Young Leebay," is a documented member of the WSC. As
17 referenced in BPD report 17-1821, BPD report 16-251347, BPD report 16-232047, BPD report 16-
18 222755, BPD report 14-81317, WARREN has been identified and documented as a WSC member.
19 These reports reference the arrests of WARREN, including gang participation charges, WARREN
20 being contacted by law enforcement within WSC territory, WARREN being contacted in the
21 company other documented WSC members, and WARREN being contacted while wearing WSC
22 representative clothing. In the aforementioned documentation, WARREN has claimed membership
23 to the WSC.

24 a. On May 2011, WARREN was arrested by KCSO for ADW, not a firearm (dismissed)
25 and terrorist threats (convicted). On July 2012, WARREN was arrested by Bakersfield Police for
26 vandalism (convicted). On October 2012, WARREN was arrested by Bakersfield Police for burglary

1 (dismissed), conspiracy (dismissed). On January 2014, WARREN was arrested by Bakersfield Police
2 for vandalism (dismissed). On March 2014, WARREN was arrested by the Bakersfield Police for
3 robbery (dismissed), petty theft (convicted). On January 2016, WARREN was arrested by KCSO for
4 burglary (convicted), conspiracy, and criminal street gang (convicted). On July 2017, WARREN was
5 arrested by Bakersfield Police for vandalism (convicted), robbery (dismissed). Based on my review
6 rap sheets and/or conviction documents, I know that one or more of these convictions was for a crime
7 punishable by imprisonment for a term exceeding one year. Consequently, it is a violation of 18
8 U.S.C. § 922(g)(1) for WARREN to possess any firearm or ammunition which has been shipped or
9 transported in interstate/foreign commerce.

10 b. Agents believe WARREN resides at 1311 Pacheco Rd #B, Bakersfield, CA. Upon
11 physical arrest on October 6, 2017, WARREN provided 1311 Pacheco Road as his place of residence.
12 According to DMV records, as of 05/01/17, 1311 Pacheco Road #B, Bakersfield, CA is the listed
13 address for WARREN. WARREN was also on probation with Kern County Probation. According to
14 probation records, as of September 19, 2017, 1311 Pacheco Road #B, was the active probation
15 address for him. As noted below, WARREN was arrested on October 6, 2017 and has been in
16 custody since that date.

17 63. **Luis FERNANDEZ**, (hereinafter, "FERNANDEZ") has been identified as a
18 methamphetamine source of supply for WSC gang member CRAWFORD. During this investigation,
19 agents seized methamphetamine from FERNANDEZ and observed FERNANDEZ deliver
20 methamphetamine to known WSC gang members for further distribution. FERNANDEZ was
21 initially identified when BPD Officers conducted the vehicle stop. FERNANDEZ had his CA
22 driver's license in his possession. I reviewed criminal history records for FERNANDEZ and learned
23 FERNANDEZ has sustained the following convictions and/or arrest: Burglary: Second Degree (July
24 2010); DUI Alcohol/Drugs; Motorcycle Without Proper License (April 2011); Cause Bodily Injury
25 (May 2012); Driving Without a License (March 2013); Driving While License Suspended (May
26 2012); Possession of Narcotics Control Substance-Deferred Judgment (May 2016). As set forth in
27

1 section V(H) below, FERNANDEZ was intercepted using CRAWFORD's TT#1 to speak with
2 T.THOMAS. I believe that the voice intercepted was indeed FERNANDEZ's because, based on
3 surveillance observations, CRAWFORD and FERNANDEZ were together in or near the Nissan later
4 identified as being driven by FERNANDEZ at the time of the call. Additionally, Agents later
5 listened to FERNANDEZ's voice after an interview, confirming it was the same voice placed on
6 CRAWFORD's phone while speaking with T.THOMAS.

7 64. **Kristi PIERSON**, (hereinafter "K.PIERSON") is believed to be an associate of the
8 WSC based on her familial relationship with G. PIERSON and is also believed to be the girlfriend of
9 T.THOMAS. As detailed in BPD report (SC17-2547), on 07/04/15, BPD Officers conducted a traffic
10 stop on a vehicle where K. PIERSON was contacted as a passenger. The other occupants of the
11 vehicle were identified as Bennie SCOBAY, Maurice SPELLMAN, R.G., and Tommie THOMAS, all
12 four of whom are documented members of the WSC criminal street gang. As detailed in BPD report
13 (SC15-4716), on 07/30/15, BPD Officers conducted a traffic stop on a vehicle where K. PIERSON
14 was contacted as a passenger. The additional occupants of the vehicle were identified as Bennie
15 SCOBAY, Maurice Spellman, and Tommie THOMAS, all three of whom are documented members
16 of the WSC criminal street gang. K.PIERSON has not sustained any convictions and/or arrests.

17 a. K.PIERSON is believed to reside at 3030 Verde Street, apartment 19, Bakersfield, CA.
18 and has been observed at this location on multiple occasions during this investigation, most recently
19 on December 1, 2017. On this date TFO Ryan Smith observed pole camera footage and observed a
20 black Dodge Avenger bearing partial CA license plate number 6LY—7. TFO Smith observed the
21 black female who exited the vehicle to resemble K.PIERSON through comparison to surveillance
22 footage taken on November 1, 2017. It should be noted that K.PIERSON was previously observed in
23 a black Dodge Avenger bearing CA license plate number 6LYW276 on November 1, 2017 at 3030
24 Verde Street. . During TFO Smith's observations on December 1, 2017, the woman believe to be
25 K.PIERSON exited the vehicle and spoke with an unknown black male on the upstairs balcony in the
26 area of apartment 19. The woman believed to be K.PIERSON then re-entered the Avenger and
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1 departed the area. An open source check of the database CLEAR on 11/17/2017, K.PIERSON had
2 established utilities at this residence. K.PIERSON's CA driver's license number shows an address of
3 1321 N Street, Bakersfield, CA. As detailed below, K.PIERSON was observed in the parking lot
4 near 3030 Verde Street, Apt. 19, whereupon a subsequent methamphetamine seizure was completed
5 on November 1, 2017. On 9/30/16, as referenced in BPD report 16-230637, K. PIERSON was
6 contacted as the victim of a vehicle theft investigation. During the investigation, K.PIERSON was
7 identified as living at 3030 Verde St, Apt 19. On November 3, 2017, TT#1 placed an outgoing call
8 to K.PIERSON at phone (661) 526-8024, used by K. PIERSON. During call, CRAWFORD, user of
9 TT1, said he needed to come to K. PIERSON's spot and that it was an emergency. Following the
10 above call, T.THOMAS also used TT1 and placed an outgoing call to K.PIERSON. During the call T.
11 THOMAS asked K. PIERSON if the apartment key was on the key ring. K.PIERSON replied that she
12 had them. As the two are about to end the call, T.THOMAS could be overheard stating "damn, I need
13 to get this stuff in the apartment." Agents later reviewed the GPS ping location for TT#1 during this
14 call. The review revealed TT1 was in the approximate area of 3030 Verde Street, indicating that K.
15 PIERSON continues to reside at the apartment complex.

16 b. Your Affiant knows K.PIERSON to be the user of (661) 526-8024 due to the phone
17 being subscribed to Valerie PIERSON (K. PIERSON's mother) as reflected in the open source
18 database "CLEAR". Additionally, in an intercepted text message on TT#4 (WHATLEY's phone) the
19 user of (661) 526-8024 is referred to as "Kristi." I also know based on my experience with the current
20 investigation that K.PIERSON is T.THOMAS's girlfriend.

21 65. **Ladaireus JONES**, aka "LD," is believed to be a member of the WSC. As referenced
22 in BPD report 17-174279, BPD report 17-99371, BPD street check 17-2205, BPD report 14-119265,
23 BPD report 14-5299, BPD report 13-182521, BPD report 11-24665, BPD report 11-215268, BPD
24 report 11-206380, BPD 10-99224, JONES has been identified and documented as a WSC member.
25 These reports include references to arrests of JONES, including gang participation charges, JONES
26 being contacted within WSC territory, JONES being contacted in the company of documented WSC

1 members, and JONES wearing WSC representative clothing. In the aforementioned documentation,
2 JONES has claimed membership to the WSC.

3 a. I reviewed criminal history records and learned JONES has sustained the following
4 convictions and/or arrests: arrest for fight/challenge in public (September 2008); juvenile arrest
5 (wardship) for threaten with intent to terrorize (June 2009); conviction for assault with a deadly
6 weapon (December 2010); conviction for felon with a firearm (December 2011); arrest for assault on
7 person with firearm (June 2014); conviction for participation in a street gang (March 2015);
8 conviction for gang member with a loaded firearm (March 2015). Based on my review rap sheets
9 and/or conviction documents, I know that one or more of these convictions was for a crime
10 punishable by imprisonment for a term exceeding one year. Consequently, it is a violation of 18
11 U.S.C. § 922(g)(1) for JONES to possess any firearm or ammunition which has been shipped or
12 transported in interstate/foreign commerce.

13 b. Based on information from the current investigation, I believe that JONES maintains
14 two residences. JONES' CA driver's license number F3305864 shows an address of 3416 Sillect
15 Ave, Suite A.⁶ The investigation revealed JONES resides at 4812 Summertree Lane, Apt A,
16 Bakersfield, CA. On 9/13/17, Officer Sanchez positively identified, based on a previously reviewed
17 booking photo, JONES exit 4812 Summertree Lane, Apt A and get into a vehicle. On 11/11/17,
18 JONES, using TT#15, received an incoming call from UM108 using telephone number (661) 546-
19 1621. During the conversation, UM108 asked JONES, "what mama address over there." JONES
20 replied, "4812 Summertree Lane." On 11/14/17, JONES made an outgoing call (Call#5849) using
21 TT#15 to J.W. using TT#16. During the conversation, J.W. told JONES he can pick him up at his
22 mother's and provided an address of 4812 Summertree Lane. Agents also obtained GPS precision
23 location information for TT15, used by JONES. During this investigation, a review of GPS location
24 pings place JONES in the approximate area of 4812 Summertree Lane both in the night and early

25 _____
26 ⁶ It should be noted that the address of 3416 Sillect Avenue Suite A, Bakersfield, CA is the address
27 for CA state parole in Bakersfield.

1 morning hours. The most recent GPS Ping placing JONES in the area of 4812 Summertree Lane was
2 on November 28, 2017. A search of the open source database Accurint on 11/17/2017 revealed
3 JONES with a matching date of birth and social security number to have a residence of record at 4812
4 Summertree Lane, Apt A, Bakersfield, CA.

5 c. JONES also resides at 720 Terrace Way, Apartment 17, Bakersfield, CA. On August
6 11, 2017, BPD responded to a shooting at 720 Terrace Way, Apartment 17, Bakersfield, CA. BPD
7 learned an unknown subject shot at the apartment. BPD contacted the occupants of the residence,
8 including JONES. JONES told officers that he lived at the apartment with the mother of his child,
9 Jasmine Williams. The current investigation revealed JONES continues to reside at the apartment.
10 On November 6, 2017, during an intercepted text message over TT15, used by JONES, JONES sent a
11 text message to C.S. that read, "12 hella on Terrace just parked". Based on this text message, I
12 believe JONES was telling C.S. that "12", a slang term to reference police, was parked at the Terrace
13 apartments, leading me to believe that JONES was present. Additionally, the GPS pings obtained for
14 TT15 revealed that during this investigation JONES was regularly located in the area of apartment
15 17, at 720 Terrace Way. The most recent GPS Ping placing JONES in the area of 720 Terrace Way
16 was on November 28, 2017, the last day pings for JONES' phone were authorized. Additionally, on
17 November 17, 2017, at about 2015 hours, BPD officers responded to 720 Terrace Way regarding a
18 disturbance call. The call record indicated there were, "40 GANG AFFILIATES DRINKING AND
19 LOITERING IN THE PARKING LOT. BMA HEAVY BUILD WEARING BLACK SHIRT DARK
20 BLUE JEANS POSSIBLY HAD A HANDGUN." The BPD officers arrived and entered the complex
21 on foot. As they entered the complex the officers observed known WSC gang members including
22 target subjects L. THOMAS, T. THOMAS, and JONES, as well as other WSC gang members. As
23 the officers approached the group, the subjects began to disperse in different directions. Officers
24 observed two subjects approach a water heater closet area in the middle of the complex, stop briefly
25 in that area, and then walked away. A short time later, officers checked the water heater closet area
26 and located three firearms had been discarded. Officers canvassed the apartment complex grounds
27

1 and located another firearm that was discarded. SA Ryan Demmon checked the GPS pings for TT15,
2 used by JONES. SA Demmon found at 2007, a few minutes prior to the time the call was broadcast,
3 TT15 pinged in the area of 720 Terrace Way, Apartment 17. TT15 continued to be located in the area
4 of the apartment 17 at 2022 hours and 2037 hours. About an hour later, at 2136 hours, TT15, used by
5 JONES, called TT16, used by J.W., also a WSC gang member. During the call, J.W. asked where
6 JONES was and then said he was at "Darrien's house." I believe that J.W. referred to the location
7 being "Darrien's house" because J.W. knows that JONES stays or resides at several locations.
8 Additionally, I believe J.W. identifies the residence as that of Darrien's more than that of JONES due
9 to JONES having several addresses. JONES asked if they were still over there. J.W. said he just
10 looked out the window and there were still police cars parked outside. J.W. indicated the officers had
11 flashlights and were walking around. JONES said he was in the southwest, indicating he left the area.
12 J.W. asked why JONES didn't tell the others he was "dipping off" (leaving). JONES said he didn't
13 have a chance to tell anyone because it was a "scary moment," and, "they was everywhere," (the
14 police). J.W. accused JONES of not being present when the officer's arrived. JONES said he was in
15 the parking lot outside the car smoking. JONES said he was outside of the car trying to get low.
16 Based on the above call, I believe that following the arrival of law enforcement, J.W. went to
17 Darrien's house. According to BPD records, Darrien Fears also resides at 720 Terrace Way,
18 apartment 17. BPD records indicate Fears is the sister of JONES. As noted above, 720 Terrace Way,
19 apartment 17, is a residence where JONES regularly attends. The above incident leads me to believe
20 that following the officer's arrival, and the WSC discarding firearms on the complex grounds, J.W.
21 went to apartment 17 to hide from law enforcement.

22 a. Agents believe JONES is the user of (661) 493-5196, herein referred to as TT15. On
23 11/6/17, JONES, using TT#15, sent an outgoing text message which read, "This LD loc me in". In
24 text #945 on TT#15, JONES was referred to as "JONES." In text #2989, JONES identified himself
25 as "LD."Based on my knowledge of this investigation I know "LD" is the known moniker for
26 JONES.

1 license number reflects an address of 908 K Street Apt B, Bakersfield, CA. Utility records obtained
2 through the open source database CLEAR revealed as recent as September 2017, ALLEN has utilities
3 in her name at 701 T Street. During multiple surveillance observations during this investigation,
4 agents have observed CRAWFORD and ALLEN at the residence. Agents are also aware ALLEN has
5 a 2013 black Volkswagen Passat bearing CA license plate number 7WYL290. A records check of the
6 plate number revealed the registered owner is "R. Hall or Allen, Bryshanique" at 380 Pacheco Road,
7 Bakersfield. On 11/1/2017, a call intercepted between CRAWFORD and T.THOMAS. During the
8 call T.THOMAS asked where CRAWFORD was located. CRAWFORD said he was taking "Brie"
9 home. Shortly after this call, a GPS ping on CRAWFORD's phone encompassed the area of 701 T
10 Street. On 11/4/2017 physical surveillance observed the same Volkswagen being towed to 701 T
11 Street and dropped off. On 11/11/2017, physical surveillance observed ALLEN driving the
12 Volkswagen just prior to being stopped by BPD after leaving the Mercado Latino. This vehicle has
13 also been seen parked at 701 T Street, Bakersfield, CA regularly during this investigation, including
14 as recently as November 18, 2017.

15 68. **Paul DEAN**, aka "P-Dub," is believed, based on my knowledge of the current
16 investigation, to be an upper-ranking member of the WSC. As referenced in BPD report 17-1821,
17 BPD report 16-170625, BPD report 16-140602, BPD street check 15-7877, BPD street check 15-
18 6673, BPD report 15-185027, BPD report 15-125134, BPD report 15-86289, BPD street check 15-
19 152, BPD report 14-153129, BPD report 14-135056, BPD report 14-80057, BPD street check 14-
20 4038, DEAN is a documented WSC gang member. These reports reference multiple arrests of P.
21 DEAN, including gang participation charges, contacts with P. DEAN within WSC territory, contacts
22 with P. DEAN in the company of other documented WSC members, and contacts with P. DEAN
23 wearing traditional WSC gang clothing. During many of these contacts, P. DEAN has claimed to be a
24 member of the gang.

25 a. I have reviewed criminal history records for P. DEAN and learned DEAN has
26 sustained the following convictions and/or arrests: arrest for carrying a concealed weapon with
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1 conviction (July 1992), conviction for domestic battery (December 1992), arrest for carrying loaded
2 firearm in public (September 1993), arrest for possession of cocaine base for sales with conviction
3 (November 1993), arrest for disorderly conduct with conviction (January 1994), arrest for possession
4 of controlled substance while armed and sales (February 1994), arrest for prior felon in possession of
5 firearm (June 1994), warrant arrest for rape and false identification to peace officer (May 1995),
6 arrest for controlled substance for sales (August 1995), warrant arrest for possession of narcotics and
7 sexual battery (May 1996), arrest for gang participation and shooting at inhabited dwelling (February
8 1999), arrest for maintaining a residence for narcotic sales (March 1999), warrant arrest for driving
9 with suspended license (September 1999), conviction for gambling (March 2000), arrest for driving
10 with suspended license (September 2000), arrest for obstruct and resisting an executive officer
11 (January 2001), arrest for take vehicle without owner's consent and possession of stolen property
12 (November 2001), arrest for municipal code violation with conviction (November 2001), arrest for
13 obstruction of a peace officer and gambling with conviction (March 2002), arrest for participation in a
14 criminal street gang, possess cocaine base for sale and obstruction of a peace officer with a conviction
15 for participation in a criminal street gang (January 2003), arrest for participation in a criminal street
16 gang, possession of cocaine base for sales and obstruction of a peace officer (February 2003),
17 conviction for obstruction of a peace officer (September 2003), conviction for failure to appear on
18 felony charge (October 2003), arrest for violation of parole (August 2005), arrest for gang member in
19 possession of a concealed firearm and parole violation with conviction (December 2005), arrest for
20 violation of parole and traffic violations (April 2007), arrest for obstruction of a peace officer and
21 parole violation with conviction (August 2007), arrest for traffic violation with conviction (October
22 2007), arrest for traffic violation with conviction (February 2008), warrant arrest for kidnapping, false
23 imprisonment, assault with deadly weapon and parole violation (July 2010) and arrest for traffic
24 violation with conviction (June 2014), arrest for traffic violation with conviction (June 2016). Based
25 on my review rap sheets and/or conviction documents, I know that one or more of these convictions
26 was for a crime punishable by imprisonment for a term exceeding one year. Consequently, it is a
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1 violation of 18 U.S.C. § 922(g)(1) for P.DEAN to possess any firearm or ammunition which has been
2 shipped or transported in interstate/foreign commerce.

3 b. Based on information from the current BPD investigation, agents believe P. DEAN
4 maintains two residences. Agents believe P. DEAN resides at 600 New Stine Road, Apartment 7,
5 Bakersfield, CA. According to DMV records, as of April 2017, 600 New Stine Road, Apartment 7, is
6 listed as the “other” address for P. DEAN. At least two times during physical surveillance, during
7 this investigation, P. DEAN has been observed leaving 600 New Stine Road, Apartment 7, including
8 as recently at November 17, 2017. During the surveillance, P.DEAN was observed exiting the
9 apartment and entering his vehicle. GPS pings for P. DEAN’s phone, (661)558-3079, herein referred
10 to as TT9, revealed that frequently during the day P. DEAN is located at the New Stine apartment. A
11 review of GPS ping data for P.DEAN’s TT#9 revealed the most recent ping placing him at 600 New
12 Stine Road occurred on November 27, 2017.

13 c. P. DEAN also resides at 8732 High Ridge Drive, Bakersfield, CA. P.DEAN has been
14 observed driving a 2012 Buick LeSabre, California license plate 6XXK836. According to California
15 DMV records, this vehicle is registered to Latonya Roberts. According to BPD reports, Roberts
16 provided her address of 8732 High Ridge Drive on November 4, 2017. Agents conducted surveillance
17 at this location and have P. DEAN coming and going from this location multiple times, including on
18 or about November 14, 2017. Agents observed P.DEAN’s known silver Buick parked in the
19 driveway. Agents observed P.DEAN exit the front door and enter the Buick. Agents also observed
20 two females exit the residence speak P.DEAN. Both females and P.DEAN subsequently re-entered
21 the residence together. P. DEAN. According to GPS pings on TT9, P. DEAN is frequently at the
22 High Ridge residence during the evening and early morning hours, consistent with someone who
23 resides at the residence A review of GPS ping data for P.DEAN’s TT#9 revealed the most recent
24 ping placing him at 8732 High Ridge Drive occurred on November 28, 2017.

25 d. Agents confirmed P. DEAN is the user of TT9. On or about 11/2/17, agents conducted
26 surveillance on P. DEAN and had a BPD unit conduct a traffic stop on P. DEAN. During the traffic
27

1 stop, the officer observed P. DEAN was in possession of a cell phone. During the stop, agents called
2 TT9 from a blocked number. At the same time as the call, the officer observed the cell phone in the
3 possession of P. DEAN receive an incoming call from a blocked number. Additionally, during
4 intercepted call, P.DEAN was identified by his moniker. In call #867 and #1922, intercepted over
5 TT9, P. DEAN was referred to “P-Dub.” In call #2525, intercepted over TT#9, P. DEAN was
6 referred to as “Paul,” and in text #8316, intercepted over TT#9, P. DEAN was again referred to as
7 “Paul.”

8 69. **Larry THOMAS**, aka “Turq Gunna,” aka “TG,” is believed, based on my knowledge
9 of the current BPD investigation, to be a high-ranking member of the WSC. L.THOMAS is a
10 documented WSC. As referenced in BPD report 17-2653, BPD report 16-130532, BPD report 16-
11 66752, BPD report 16-12127, BPD street check 15-5095, BPD report 15-152660, L.THOMAS has
12 been identified and documented as a WSC member. These reports include references to arrests,
13 including gang participation charges, and having been contacted within WSC territory. Additionally,
14 these reports reference contacts of L. THOMAS with other documented WSC members and many
15 reveal him wearing WSC representative clothing. In the aforementioned documentation,
16 L.THOMAS has claimed membership to the WSC.

17 a. L.THOMAS has sustained the following convictions and/or arrests: arrest for second
18 degree robbery (May 2008); juvenile arrest (wardship) for minor in possession of a firearm (August
19 2008); juvenile arrest (wardship) for exhibiting a deadly weapon (September 2008); juvenile arrest
20 (wardship) for carrying concealed unregistered loaded firearm (August 2009); arrest for criminal
21 threats (March 2010); conviction for willful discharge of firearm with gross negligence (September
22 2010); parole violation (revocation) (October 2012); conviction for felon with a firearm (November
23 2013). Based on my review rap sheets and/or conviction documents, I know that one or more of these
24 convictions was for a crime punishable by imprisonment for a term exceeding one year.
25 Consequently, it is a violation of 18 U.S.C. § 922(g)(1) for L.THOMAS to possess any firearm or
26 ammunition which has been shipped or transported in interstate/foreign commerce.

1 b. The investigation has revealed L. THOMAS uses 612 El Sereno Drive, Bakersfield,
2 CA as an address of record. According to DMV records, as of November 2016, 612 El Sereno Drive
3 was listed as L. THOMAS's mailing address. Additionally, on November 8, 2017, L. THOMAS
4 called the Kern Schools Federal Credit Union. This call was intercepted over TT7. During the call L.
5 THOMAS provided his address as 612 El Sereno Drive.

6 c. The investigation has revealed L. THOMAS has a girlfriend named Laderricka
7 Mackey. Based on the nature of the conversations intercepted between L. THOMAS and Mackey,
8 agents believe they are in a dating relationship. Additionally, multiple times during this investigation
9 L. THOMAS surveillance observed driving a vehicle registered to Mackey, specifically, a Chevy
10 Malibu bearing CA license plate 7YNP206. On 10/14/17, L.THOMAS was stopped in that vehicle
11 by BPD. Agents learned through open data sources, as of 11/17/17, Laderricka Mackey had
12 established utilities at 6105 Ringsdale Court, Bakersfield, CA. On November 15, Agents were
13 following L.THOMAS as he drove around in his silver Malibu and picked up D.W.. For a short
14 period of time, surveillance lost site of the Malibu. Agents traveled to 6105 Ringsdale Court because
15 D.W.'s phone had GPS pings that indicated he was in the area of the residence. Upon arrival, Agents
16 observed the silver Malibu parked inside the garage with the garage door open. On November 20,
17 2017, Agents observed L. THOMAS leaving 6105 Ringsdale Court, and driving away in the Malibu.
18 Agents also have GPS pings on TT7, used by L. THOMAS. Although these pings cover a large area,
19 regularly during this investigation the pings cover the Ringsdale Court address during the evening
20 and early morning hours.

21 d. Agents are aware L. THOMAS is the user of phone number (702) 969-2158, herein
22 referred to as TT7. On 11/8/18, L.THOMAS, using TT#7, made an outgoing call (Call#1531) to
23 Kern Federal Credit Union. During the call, L.THOMAS identified himself by name and spoke with
24 a customer service representative during which time he provided his social security number. In text
25 #2126 on TT#7, L.THOMAS sent a photograph of himself.

26 *(The above-referenced individuals are hereinafter referred to as the “Target Subjects”)*

1 70. **Augustus CRAWFORD**, “AJ” (hereinafter, “CRAWFORD”) is deceased. I will
2 describe his status in the WSC and his criminal history to give context to the Target Subjects’
3 interactions with him. Based on this investigation, including intercepted calls, surveillance, and
4 source reporting, I believe that CRAWFORD was involved in narcotics sales, obtaining firearms
5 through property crimes, and the commission of crimes of violence. CRAWFORD was a
6 documented WSC member as indicated in BPD reports that reflect that CRAWFORD has been
7 contacted within WSC territory, in the company of additional, documented WSC members, and
8 wearing WSC representative clothing, and has claimed membership in the WSC. Based on records
9 checks and surveillance, CRAWFORD resided at 320 4th Street, Bakersfield, CA. CRAWFORD has
10 sustained the following convictions and/or arrests: arrest for assault with a deadly weapon other than
11 firearm (October 2012); juvenile arrest (wardship) for fighting in public (October 2012); arrest for
12 first degree burglary (March 2013); juvenile arrest (wardship) for first degree burglary (May 2013);
13 juvenile arrest (wardship) for minor in possession of ammunition (August 2013); arrest for
14 probationer in possession of a firearm (February 2015); arrest for gang member in possession of
15 firearm (March 2016); conviction for possession of a controlled substance for sales (July 2016);
16 conviction for prohibited person with a firearm (July 2016); conviction for participation in a criminal
17 street gang (October 2016).

18 **D. May 3, 2017 W.THOMAS Sold Crack Cocaine to CRI#1 (PC to arrest W.THOMAS**
19 **and to search his residence)**

20 71. On May 3, 2017, CRI#1 conducted a controlled purchase of suspected crack cocaine
21 for \$620 from William THOMAS. During the purchase, law enforcement conducted surveillance and
22 made the following observations:

23 72. At approximately 1:30 PM, surveillance was established in the area of Burger King,
24 5101 Stockdale Highway, Bakersfield, California. At approximately 1:52 PM, CRI#1 met agents at a
25 predetermined meeting location. Agents searched CRI#1 and his/her vehicle for contraband and
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1 found none. CRI#1 had approximately \$15, of which agents took custody until the conclusion of the
2 controlled buy. Agents equipped CR#1 with a recording device.

3 73. At approximately 2:24 PM, the CRI#1 made a consensually recorded and live
4 monitored telephone call to W. THOMAS at telephone number 661-535- 9143. During the call
5 CRI#1 identified the user of 661-535-9143 as that of W. THOMAS. CRI#1 recognized the voice of
6 W. THOMAS from prior interactions. CRI#1 and W. THOMAS agreed upon a drug transaction of
7 \$625 for 17.5 grams of crack cocaine. W. THOMAS stated he was taking his son to the doctor and
8 would be done within the hour.

9 74. At approximately 3:25 PM, the CRI#1 made a consensually recorded and live
10 monitored telephone call to W. THOMAS at telephone number 661-535- 9143. W. THOMAS stated
11 he was still at the doctor's office, three people were in front of him and it wouldn't be that long. At
12 approximately 4:16 PM, the CRI#1 made a consensually recorded and live monitored telephone call
13 to THOMAS at telephone number 661-535-9143. THOMAS stated he was walking out of the doctor's
14 office and would be at Burger King in 10 minutes.

15 75. At approximately 4:21 PM, CRI#1 traveled to Burger King, 5101 Stockdale Highway,
16 Bakersfield, California. CRI#1 was kept under constant visual surveillance. At approximately 4:25
17 PM, the CRI#1 arrived at Burger King.

18 76. From approximately 4:34 PM to 4:47 PM, agents overheard on the audio transmitting
19 device the CRI#1 attempt four telephone calls to W. THOMAS at 661-535-9143. The calls were
20 directed to voicemail. At approximately 4:54 PM, the CRI#1 made a consensually recorded and live
21 monitored telephone call to W. THOMAS at telephone number 661-535-9143. THOMAS told the
22 CRI#1 he would be there soon.

23 77. At approximately 5:01 PM, law enforcement observed a white Cadillac sedan, bearing
24 California registration 7GQF693, traveling southbound on Village Lane, south of Stockdale
25 Highway. Law enforcement recognized the driver of the Cadillac to be W. THOMAS based on
26 pictures from Facebook, his California DMV picture and prior contacts. Law enforcement observed
27

1 the CRI#1 enter the passenger side of the Cadillac and the Cadillac departed eastbound through the
2 parking lot.

3 78. At approximately 5:03 PM, the CRI#1 called law enforcement and advised that he/she
4 was walking back toward his vehicle. Law enforcement again identified W.THOMAS as he was
5 leaving the meet.

6 79. At approximately 5:06 PM, the CRI#1 stated over the live audio transmitting device
7 he/she was going back into the Burger King. At approximately 5:09 PM, law enforcement observed
8 the CRI#1 exit Burger King and got into his/her vehicle. The CRI#1 was kept under constant visual
9 surveillance from Burger King to the predetermined meeting location.

10 80. At approximately 5:19 PM, the CRI#1 arrived at the predetermined meeting location
11 and law enforcement deactivated the recording devices. The CRI#1 returned with a clear plastic bag
12 containing a white rock-like substance. Law enforcement seized the evidence and placed it inside a
13 larger clear plastic bag. The evidence was placed in a secure location. The CRI#1 handed me the
14 remaining \$78.40 of unused FBI purchase funds from the purchase of crack cocaine and from the
15 purchase of an order of small french fries from Burger King. CRI#1 advised that he/she purchased
16 the small order of french fries from Burger King after meeting with W. THOMAS. The CRI#1
17 advised he/she did this because the CRI#1 believed THOMAS was possibly still in the area and did
18 not want to look suspicious.

19 81. At approximately 5:25 PM, law enforcement searched CRI#1 and the CRI#1's vehicle.
20 No money or contraband was found.

21 82. During the subsequent debrief the CRI#1, he/she stated he/she attempted to call W.
22 THOMAS several times while waiting, but the calls went to voicemail. The CRI#1 was finally able to
23 contact W. THOMAS via telephone and he said he would be there shortly. W. THOMAS arrived by
24 himself in a white Cadillac and the CRI#1 entered the vehicle. The two drove around the parking lot
25 slowly during the transaction. The CRI#1 handed W. THOMAS the money and he counted it. The
26

1 CRI#1 could not remember if W. THOMAS handed the drugs to him/her, or if the CRI#1 picked
2 them up from the center console.

3 83. Later, agents weighed the clear plastic bag containing the white rock-like substance. It
4 weighed 18.46 grams. I conducted a presumptive field test on the white rock-like substance inside the
5 clear plastic bag. The test resulted in a positive reaction for cocaine base.

6 84. I have listened to the recording of this controlled buy and it is consistent with the
7 information provided by CRI#1.

8 **E. October 21, 2017 W.THOMAS sold Crack Cocaine to CRI#1 (PC to arrest**
9 **W.THOMAS and to search his residence)**

10 85. On October 21, 2017, at approximately 1400 hours, law enforcement conducted a
11 controlled buy utilizing CRI#1. During the operation, CRI#1 used \$750.00 dollars of pre-recorded
12 buy funds to purchase 22.51 grams of cocaine base (crack cocaine) from W. THOMAS. The deal was
13 arranged by W. THOMAS using Target Telephone #3, (661) 535-9143. The following surveillance
14 observations and intercepted calls are listed in chronological order.

15 86. At approximately 1354 hours, agents intercepted an outgoing call (Call #4093) from
16 W.THOMAS on TT3, (661) 535-9143 to CRI#1.⁸ During the call, CRI#1 asked for a "little ten."
17 W.THOMAS asked if CRI#1 needed the "ten five" and CRI#1 responded, "yeah." W.THOMAS
18 asked again if CRI#1 needed a "ten five" and CRI#1 responded, "roger that." W.THOMAS said all
19 right and asked where CRI#1 wanted W.THOMAS to bring it. CRI#1 told W.THOMAS he was
20 leaving Oildale right now. CRI#1 told W.THOMAS he needed 10-15 minutes and asked
21 W.THOMAS if he wanted to meet at Weinerschnitzel or something. W.THOMAS told CRI#1 yeah
22 he could meet him there.

23 87. On the above intercepted call, the CRI#1 spoke with W.THOMAS to arrange the
24 controlled buy of cocaine base (crack cocaine) for later in the afternoon. Based on my training and

25
26 ⁸ The intercepted conversations discussed in this affidavit are not all of the conversations intercepted,
27 not the entire conversation, nor are they necessarily the final exact verbatim transcript of each call.
28 Transcriptions have yet to be finalized.

1 experience, I know in the above call, CRI#1 asked W.THOMAS for "ten" grams of crack cocaine.
2 The location of the controlled buy would be at the Weinerschnitzel on Brundage Lane and Hughes
3 Lane, a short distance from W.THOMAS' residence at 409 Stephens Street. Your Affiant and SA
4 Cantrell instructed CRI#1 to advise W.THOMAS he/she would need 10 to 15 minutes prior to the
5 buy to allow agents sufficient time to brief CRI#1 before the meet with W.THOMAS.

6 88. At approximately 1425 hours, Officer Szatmari along with FBI Agents C. Cantrell and
7 B. Myers met with the FBI CRI#1 at a pre-determined location. Agents searched CRI#1 and his/her
8 vehicle for any contraband with negative results. Agents provided CRI#1 with \$800.00 dollars of
9 pre-recorded buy funds and provided CRI#1 a recording device to record the transaction with
10 W.THOMAS. Agents instructed CRI#1 to call W.THOMAS regarding the controlled buy.

11 89. At approximately 1501 hours, agents intercepted an incoming call (Call #4133) to
12 W.THOMAS on TT3, (661) 535-9143 from CRI#1. During the call, W.THOMAS asked the CRI#1
13 if he/she wanted to meet at the Wible gas station. CRI#1 told W.THOMAS he/she was on the way
14 and asked W.THOMAS to give him/her a "nickel." THOMAS asked CRI#1 if he/she wanted a half.
15 The CRI#1 responded, yeah. W.THOMAS responded, "oh this is better too" and told the CRI#1 ok
16 and went on to say that nobody on Union could "fuck with him." The CRI#1 told W.THOMAS if it
17 was good he would lock him in and W.THOMAS responded that he would let it talk for itself. CRI#1
18 told W.THOMAS he was in the car right now and W.THOMAS told CRI#1 to call him when he/she
19 was close.

20 90. Based on the above intercepted call, W.THOMAS asked CRI#1 to meet at Larson's
21 Food and Gas located at 720 Wible Road. CRI#1 agreed to meet W.THOMAS. CRI#1 again asked
22 THOMAS for a specific quantity of narcotics when he/she asked for a "nickel." W.THOMAS agreed
23 and told CRI#1 that the narcotics he was bringing to CRI#1 was of high quality and CRI#1 would not
24 be able to find anything better on Union Avenue.

25 91. At approximately 1502 hours, SA Compston saw CRI#1's vehicle travel south bound
26 on Union from the strip mall. Office Szatmari followed CRI#1 and surveillance units responded to
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1 Larson Food and Gas. At approximately 1510 hours, surveillance units initiated surveillance at
2 Larson Food and Gas. At approximately 1515 hours, agents intercepted an incoming call (Call
3 #4140) to W.THOMAS on TT3, (661) 535-9143 from CRI#1. During the call, W.THOMAS asked
4 CRI#1 if he/she was there. CRI#1 told THOMAS he/she was pulling up. THOMAS told CRI#1 that
5 he was pulling up too.

6 92. At approximately 1515 hours, Officer Szatmari followed CRI#1 to the Larson Food
7 and Gas. CRI#1 pulled his vehicle next to the gas pumps in front of the store. At approximately
8 1517 hours, SA Compston saw CRI#1 exit his/her vehicle. At that same time, SA Pacheco saw
9 W.THOMAS arrive in his 2008 red Chevy Impala, California license #6XZU252 (R/O Carlos Perez,
10 9226 Burke Street, Apt 5, Pico Rivera). W.THOMAS parked next to the gas pumps in front of the
11 store. Officer Sanchez saw CRI#1 walk to and get into the passenger side of THOMAS's Impala.

12 93. CRI#1 requested more crack cocaine from W.THOMAS during the first meet.
13 W.THOMAS informed CRI#1 that he would be going to his source of supply to get more narcotics.

14 94. At approximately 1518 hours, SA Pacheco saw CRI#1 exit the Impala and walk to
15 his/her vehicle. W.THOMAS left the lot and traveled west bound on Belle Terrace. Officer Szatmari
16 followed CRI#1 away from the gas station. Surveillance units followed W.THOMAS away in an
17 attempt to identify his source of narcotics.

18 95. At approximately 1519 hours, SA Pacheco followed the Impala west bound on Belle
19 Terrace as it approached a red light at South Real. W.THOMAS ran a red light at the intersection and
20 continued south bound on South Real from Belle Terrace. Because of oncoming traffic, SA Pacheco
21 had to wait for the traffic light to turn green before he could continue south on South Real. As SA
22 Pacheco continued south on South Real, SA Pacheco was not able to locate the Impala. Assisting
23 units and SA Pacheco searched the area and could not locate W.THOMAS. Agents responded to the
24 Family Dollar parking lot and initiated surveillance.

25 96. At approximately 1544 hours, agents intercepted an incoming call (Call #4143) to W.
26 THOMAS on TT3, (661) 535-9143 from CRI#1. During the call, W. THOMAS told CRI#1 that he

1 was on his way to him/her right now. CRI#1 told W.THOMAS he was at the Family Dollar parking
2 lot.

3 97. At approximately 1613 hours, SA Compston saw W.THOMAS' red Impala arrive and
4 park next to CRI#1's vehicle. CRI#1 exited his/her vehicle and walked to the passenger side of the
5 Impala. CRI#1 got inside the passenger side of the Impala. A short time later, CRI#1 exited the
6 Impala and stood by the front passenger door.

7 98. At approximately 1614 hours, SA Compston saw CRI#1 walk to his/her vehicle and
8 left the lot. Officer Szatmari followed CRI#1 to a predetermined location W.THOMAS left the lot
9 and continued south bound on Olive Avenue. Agents maintained surveillance on W.THOMAS until
10 agents were able to confirm the controlled buy was successful.

11 99. At approximately 1628 hours, your agents met with CRI#1 at a predetermined
12 location. Agents debriefed CRI#1 regarding the controlled buys with W.THOMAS. Agents seized
13 two clear plastic baggies containing crack cocaine. CRI#1 purchased 14.41 grams of crack cocaine
14 on the first meet with W.THOMAS and 8.11 grams of crack cocaine on the second meet with
15 W.THOMAS. The total amount of crack cocaine for both meets was 22.51 grams of crack cocaine.
16 Both clear plastic baggies containing the crack cocaine tested positive for cocaine base during a
17 presumptive field test and were booked into the FBI evidence vault

18 100. I have listened to the recording of this controlled buy and it is consistent with the
19 information provided by CRI#1.

20 **F. On October 25, 2017, W.THOMAS sold Crack Cocaine to CRI#1 (PC to arrest**
21 **W.THOMAS and to search his residence)**

22 101. On October 25, 2017, your Affiant made arrangements with a CRI#1 to purchase
23 cocaine base from W.THOMAS. Your Affiant and other agents met CRI#1 at a pre-determined
24 location in Bakersfield, CA. During the meeting, CRI#1 was instructed to call TT#3, used by
25 W.THOMAS to arrange the controlled purchase.

26 102. During the buy on October 25, 2017, at 1608 hours, Agents intercepted an incoming
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1 call to W.THOMAS, using TT#3, (Call# 4744). This call was made by CRI#1. During the call,
2 W.THOMAS answered. CRI#1 recognized the voice of the subject who answered the phone as that of
3 W.THOMAS. CRI#1 told W.THOMAS that he/she was trying to get the "same thing." As noted
4 above, CRI#1 had recently purchase cocaine base from W. THOMAS during a previous controlled
5 buy, so when CRI#1 asked for the "same thing," CRI#1 was asking to purchase cocaine base. W.
6 THOMAS said he would check what he's got and call right back.

7 103. At 1621 hours, CRI#1 again called TT#3 and spoke with W.THOMAS. This call was
8 also intercepted. During the call, W.THOMAS said, "Checking right now for you...I'm getting it,
9 right now." W.THOMAS said he would call back in 2 minutes. Based on the conversation in this
10 call, as well as your Affiant's knowledge of this investigation, your Affiant believes that
11 W.THOMAS was informing CRI#1 that he was getting cocaine base to sell him/her and would call
12 him/her right back. A short time later, at 1626 hours, Agents intercepted an outgoing call from
13 W.THOMAS, using TT#3, to the CRI#1, call 4745. During the call, W.THOMAS said he had ten
14 now and had to get another eleven from some "bitch uh, when Tap's neighbor leave." W.THOMAS
15 said he would give CRI#1 what he had now and then would call him back later. CRI#1 agreed and
16 said he/she wanted to talk to W.THOMAS about something else later as well. W.THOMAS told
17 CRI#1 to call him when he got to the store (the location where they agreed to meet to make the
18 purchase).

19 104. Based on your Affiant's training, experience and knowledge of this investigation, your
20 Affiant believes that W.THOMAS was telling CRI#1 that he had 10 grams of cocaine base available
21 right now and he had to get another 11 grams of cocaine base when "Tap's" (WSC gang member
22 Tommie THOMAS) neighbor left.

23 105. Prior to the controlled buy, CRI#1 and his/her vehicle were searched for contraband.
24 None was found. CRI#1 was also provided with pre-recorded money to make the purchase of
25 cocaine. Surveillance was then conducted by Agents prior to, during, and after the controlled buy. At
26 1628 hours, Investigator M. Szatmari observed CRI#1 leave the meeting location with agents.

1 Investigator M. Szatmari followed CRI#1 as he made his/her way to the gas station on Bell Terrace
2 and Wible Rd.

3 106. At 1648 hours, Agents intercepted an incoming call to W.THOMAS, using TT#3,
4 from CRI#1, call 4748. During the call, CRI#1 said he was pulling up. W.THOMAS said he was
5 pulling up as well. At 1652 hours, Investigator M. Szatmari observed CRI#1 pull into the gas station
6 on the northeast corner of the intersection of Bell Terrace and Wible Rd.

7 107. Meanwhile, surveillance was also being conducted at 409 Stephens Drive, Bakersfield,
8 CA, an apartment complex a short distance from the gas station CRI#1 had arranged to meet
9 W.THOMAS. As noted above, Agents are aware that 409 Stephens Drive, Apt 9, Bakersfield, CA is
10 the residence of W.THOMAS.

11 108. At 1655 hours, Officer Jeffries observed a heavysset black male, later identified as
12 W.THOMAS, come downstairs from the apartments at 409 Stephens Drive and get into a red vehicle.
13 The vehicle traveled to the gas station at Bell Terrace and Wible Rd and arrived at 1656 hours.

14 109. SA Pacheco observed CRI#1 exit his/her vehicle and get in the right rear passenger
15 seat of W.THOMAS's vehicle. SA Pacheco identified that W.THOMAS⁹ was driving the red Chevy
16 Impala and noted the license plate was California 6XZU252. CRI#1 stayed in the rear seat of the
17 vehicle for a few minutes and then returned to his/her vehicle. CRI#1 was then observed leaving in
18 his/her vehicle. Investigator M. Szatmari maintained surveillance on CRI#1 as CRI#1 returned to
19 meet with your Affiant.

20 110. SA Pacheco maintained surveillance on W.THOMAS. Following the meeting with
21 CRI#1, W.THOMAS repositioned his vehicle in the parking lot and then exited the vehicle. SA
22 Pacheco observed a small black female child also exit W.THOMAS's vehicle. The child was
23 wearing only a diaper and was barefoot. W.THOMAS went into the store and the child followed.
24 After several minutes, W.THOMAS exited the store and both he and the child got into the car and
25

26 ⁹ SA Pacheco recognized W. THOMAS from the prior ruse call in which he participated in on
27 September 11, 2017.

1 left. Officer Jeffries maintained surveillance on the vehicle as it travelled back to 409 Stephens
2 Drive, Bakersfield, CA. Officer Jeffries observed W.THOMAS exit the vehicle walk towards an
3 apartment. Officer Jeffries lost sight of W.THOMAS when he went under an awning. Officer
4 Sanchez was in the apartment complex on foot and he observed W.THOMAS go into apartment
5 number #9. Officer Sanchez observed children enter the apartment first and were followed behind by
6 W.THOMAS who closed the door after entering.

7 111. Following the controlled buy, your Affiant again met with CRI#1. CRI#1 handed your
8 affiant a clear plastic baggie containing a white rock like substance. Based on your Affiant's training
9 and experience, your Affiant believes the substance to be crack cocaine. CRI#1 stated he/she
10 purchased the substance from W.THOMAS in the vehicle. CRI#1 stated he/she handed \$375.00 in
11 pre-recorded buy money to W.THOMAS for the substance. Your Affiant would later weigh the white
12 rock like substance and discovered CRI#1 purchased approximately 11.16 grams of cocaine base. A
13 subsequent presumptive field test of the white rock like substance was completed and resulted in a
14 positive reaction indicating cocaine base.

15 112. Based on the above controlled buys, intercepted calls between W.THOMAS and
16 CRI#1 , and surveillance observations, your Affiant believes there is probable cause to arrest
17 W.THOMAS for the violation of Title 21, United States Code, Section 841(a)(1) (distribution of
18 crack cocaine). Additionally, based on the observations at W.THOMAS's Residence, and the
19 probable cause to believe that he is a drug dealer, I believe evidence of these violations will be
20 located at his residence, described as 409 Stephens Drive, Bakersfield, CA, apartment #9 and the
21 vehicle he was driving, described as a red Chevy Impala bearing a license plate of California
22 6XZU252.

23 113. Your Affiant is aware based on his knowledge of this investigation that W.THOMAS
24 acts a cocaine dealer for the WSC Intercepted calls over TT#3, used by W.THOMAS have revealed
25 that he regularly sells cocaine and other controlled substances, including methamphetamine to
26 multiple customers. Based on intercepted communications over W.THOMAS's TT#3, I know he is
27

1 involved with drug transactions with several different subjects. For example, on September 28, 2017,
2 investigators intercepted a call between W.THOMAS using TT#3 and a female subject at telephone
3 number 701-595-9695. During the conversation, W.THOMAS and the female speak about how she
4 was involved with drug trafficking with T.THOMAS in North Dakota but expressed that she should
5 have worked with W.THOMAS.

6 114. Another such example was intercepted on November 15, 2017. A male subject using
7 telephone number 661-703-0735 contacted W.THOMAS at TT#3. During the conversation, when
8 asked by W.THOMAS what he wants to do, the male subject replied he wanted 25 pieces of glass
9 cut. W.THOMAS told the male subject he would call him back and also told the male subject he got
10 pulled over last night. W.THOMAS said the "police being heavy there". I believe based on my
11 experience investigating drug traffickers that "25 pieces of glass" is referring to methamphetamine. I
12 know meth to be referred to by several coded language terms such as "ice", "glass", and "Crys".

13 115. As noted above, I believe evidence of these violations will be located at 409 Stephens
14 Drive, Apartment 9, Bakersfield, CA. See section titled "Evidence of Crimes Likely to be Recovered
15 from Subject Premises." This belief is based on the evidence noted above that W. THOMAS is both a
16 WSC gang member as well as a drug trafficker.

17 **G. W.THOMAS is Operating an Illegal Gambling Business (PC to Search W.THOMAS's**
18 **Residence)**

19 116. On May 1, 2017, CRI#1 reported that W.THOMAS was attempting to rent a location
20 next to Dollar General, in the area of Union Avenue and 4th Street, Bakersfield, California (address
21 later confirmed as 333 Union Avenue, Suite 105, Bakersfield California; hereafter referred to as
22 "WSC Casino"). CRI#1 stated W.THOMAS has collected approximately \$30,000 from "Big Kool,"
23 a known WSC gang member. CRI#1 stated W.THOMAS is attempting to open up a "Casino" which
24 will also serve as a WSC affiliated hangout. CRI#1 stated W.THOMAS is also attempting to acquire
25 \$7,500 to purchase a gambling machine from overseas to put inside the WSC Casino. Later that
26 month, on May 31, 2017, CRI#1 reported W.THOMAS opened the WSC Casino and was acquiring
27
28

1 12 more computers to place inside the WSC Casino for gambling. CRI#1 later reported that
2 W.THOMAS keeps 15% of the winnings by anyone who gambles in the casino.

3 117. On June 7, 2017, FBI agents conducted surveillance at the WSC Casino. There, they
4 saw a white Cadillac that W. THOMAS had previously been seen driving. The WSC Casino had an
5 “open” sign illuminated in the window. Member of the surveillance team also saw W.THOMAS lock
6 and unlock the front door to the WSC Casino. During this time, the FBI also received a 19 meter
7 GPS ping for TT#3, used by W. THOMAS, in the same area, indicating he was present at the WSC
8 Casino.

9 118. On June 9, 2017, CRI#1 reported he/she went into the WSC Casino and observed the
10 following: Upon entering the WSC Casino there was a counter with a computer. There is a false wall
11 with a door located to the left. Behind the false wall was where the gambling computers were located
12 and a large "fish" gambling machine in the center. Customers inside the WSC Casino would give the
13 personnel in charge money. The personnel in charge of the WSC Casino would load the money given
14 into a machine, turn a key, which would transfer the money to the gambling computers. When the
15 customers wanted to cash out, the personal in charge of the WSC Casino would provide money from
16 their personal wallet.

17 119. FBI SA Cantrell conducted an open source check of business license records and
18 located a business license record associated with 333 Union Avenue, the aforementioned casino,
19 which indicated that a business license was issued to the location on 4/26/17. The business type was
20 reported as “new retailers miscellaneous.” The registered business name was Josiah’s Trading Post.
21 W.THOMAS’s name was listed as registered owner. Based on BPD reports regarding child custody
22 and restraining order disputes, a child named “Josiah” has been identified as A.H’s son. I believe the
23 use of the name “Josiah” for the business license corroborates CRI#1’s statement that A.H. and
24 W.THOMAS conspired to open the casino. Additionally, during review of surveillance video obtain
25 by CRI#1, law enforcement has noted the placement of candy, snacks and other miscellaneous items
26 for sale in the foyer of the casino location in front of a wall that completely hides casino activity.

1 Law enforcement believes that this is a further attempt by W. THOMAS and others to conceal the
2 true nature of the business. FBI TFO Clark also obtained business and tax records for 333 Union
3 Avenue, Bakersfield California, which revealed a business name of "Josiah's Trading Post" and a
4 control number of 158878.

5 120. On June 13, 2017, SA Cantrell received a mail cover from the United States Postal
6 Inspection Service for 333 Union Avenue, suite 105, Bakersfield California (the WSC Casino).
7 Examination of the mail cover revealed several billing statements addressed to "Josiah's Trading
8 Post" and mail from Deluxe, Pitney Bowes, and Dell were addressed to "Josiah's Trading Post" and
9 "William Earl Thomas". Based on this, I believe this mail cover, the business and tax documents for
10 this address confirm W.THOMAS as the owner and primary operator of the WSC Casino.

11 121. On June 13, 2017, FBI CRI#1 conducted a consensually recorded operation at the
12 WSC Casino. Agents provided CRI#1 \$100 in FBI funds for gambling at the suspected WSC Casino.
13 CRI#1 was also equipped with a recording device and explained to CRI#1 how to use the device.

14 122. On June 13, 2017, at approximately 6:00 PM, CRI#1 entered the WSC Casino. The
15 front door was propped open and "Big Guy" (moniker for W.THOMAS), was at the front counter
16 assisting a customer with "cashing out." W.THOMAS refers to the gambling location as the
17 "casino." The front of the casino has a wall with a door concealing the rear part of the casino, where
18 gambling computers and machines are located. The gambling computers are desktop computers with
19 a keyboard and mouse. When a customer wants to gamble, they provide W.THOMAS with money.
20 W.THOMAS then loads the money from a computer which is located near the front entrance. Once
21 W.THOMAS loads the money from the computer near the front entrance, it is then available to be
22 played on a computer in the rear of the casino. CRI#1 stated there was another black male named
23 "Jerry" working at the casino. Jerry was sweeping the store. CRI#1 believes Jerry is related to
24 W.THOMAS. CRI#1 played \$20 on a desktop computer and lost al \$20. CRI#1 provided
25 W.THOMAS with an additional \$20 which W.THOMAS loaded onto a gambling computer. CRI#1
26 stated he/she lost that \$20 as well. On June 14, 2017, at approximately 2:30 AM, CRI#1 entered the

1 WSC Casino again. "Big Guy" (W.THOMAS), "JarMice" (moniker for WSC J.T.) and "Tone"
2 (moniker for A.H.) were all present. CRI#1 stated W.THOMAS, J.T. and A.H. are "running the
3 place." CRI#1 played \$10 on a gambling "fish machine" located in the middle of the casino, and \$10
4 on a gambling desktop computer, losing all \$20. CRI#1 observed W.THOMAS do what appeared to
5 be a hand-to-hand drug transaction with another person inside the WSC Casino.

6 123. I have reviewed the recordings that CRI#1 made on June 13, 2017 and June 14, 2017
7 and have found that details explained above can be corroborated by the recording as well as prior
8 debriefs with CRI#1.

9 124. On June 15, 2017, CRI#1 conducted a consensually recorded operation at the WSC
10 Casino. CRI#1 later reported to agents that CRI#1 entered the WSC Casino. "Big Guy" (aka
11 W.THOMAS) was operating the casino. CRI#1 played \$20 (provided by the FBI) on the desktop
12 gambling computer. After losing the \$20, CRI#1 provided W.THOMAS with an additional \$10 to
13 play on his/her phone. CRI#1 stated the gambling website's address is "SkillMine.net," which can
14 also be accessed from personal devices to gamble remotely. W.THOMAS told CRI#1 the gambling
15 computer were not working earlier because W.THOMAS had to pay the "software people."

16 125. I have reviewed the recording that CRI#1 made on June 15, 2017 and have found that
17 details explained above can be corroborated by the recording as well as prior debriefs with CRI#1.

18 126. On June 16, 2017, SA Williams conducted an open source query of SkillMine.net
19 through Whois revealing the following:

20 a. Registrar URL: <https://www.reg.com>; <https://reg.ru>; <https://W\V\V.reg.ua>

21 b. Registrar Email: SkillMine.net(a),regprivate.ru

22 c. Registrar Phone Number: +7 4955801111

23 d. Registrar Name: Protection of Private Person

24 e. Registrar Street: P.O. Box 87, REG.RU Protection Service

25 f. Registrar City: Moscow

26 g. Registrar Postal Code: 123007

1 127. Based on my training and experience, and knowledge of this investigation, I believe
2 that SkillMine.net is a foreign-operated company and the WSC, including W.THOMAS are
3 strategically utilizing the SkillMine.net website inside the WSC Casino to conceal their illegal
4 operations in furtherance of the WSC.

5 128. On June 20, 2017, at approximately 1:15 PM, law enforcement conducted surveillance
6 of the WSC Casino. They saw W.THOMAS's Cadillac in the parking lot. At approximately 1:48
7 PM, they observed a dark gray Dodge Charger with green paper plates, pull directly in front of the
8 WSC Casino. CRAWFORD and two other WSC members exited the charger and entered the WSC
9 Casino. At approximately 1 :52 PM, TFO Smith received an updated GPS ping for CRAWFORD in
10 the area of Daniels Street and Texas Street (1352 meter uncertainty), which is approximately a half-
11 mile from the WSC Casino.

12 129. On June 21, 2017, at approximately 2:45 PM, agents met with CRI#1 and provided
13 CRI#1 with an Apple Macbook Pro laptop. CRI#1 consensually accessed the website SkillMine.net.
14 CRI#1 logged into the website SkillMine.net with a username and password he/she obtained from
15 W.THOMAS from a previous visit at the WSC Casino. CRI#1 consensually browsed the website and
16 accessed two games, Black Jack and Roulette. The account CRI#1 was signed into displayed "14.00"
17 in the lower left corner of the website, which corresponded to the dollar amount remaining from a
18 previous consensually recorded operation where CRI#1 gave W.THOMAS money in order to
19 gamble. CRI#1 confirmed SkillMine.net is the same website he/she used while inside the WSC
20 Casino previously.

21 130. On August 14, 2017, CRI#1 reported that T. THOMAS stated it cost \$25,000 to
22 \$30,000 in startup cost to operate the casino. There was also an individual who wants to move the
23 WSC casino due to the fact it is doing so well. When the casino is operating well, they can re-coop
24 \$25,000 in one week.

25 131. On September 10, 2017 CRI#1 reported that he/she heard the W. THOMAS had shut
26 down the WSC casino and moved to another location. This information is corroborated via captured
27

1 pole camera recordings covering the dates of September 7 through September 11, 2017 in which
2 THOMAS and others were observed removing items from 333 Union Avenue, Suite 105,
3 Bakersfield, CA.

4 132. During the wiretap investigation, agents continued to learn about W. THOMAS's
5 gambling operation. On September 28, 2017, during an intercepted call over TT3, W. THOMAS
6 spoke with an unknown male and talked about how he wanted to get his casino back, but needed a
7 building. On October 1, 2017, during an intercepted call over TT3, W. THOMAS told an unknown
8 male that he would get the casino back up and running when he got his "fish game" fixed. On
9 November 9, 2017, at 1543 hours, W. THOMAS, using TT3, spoke with an unknown male. During
10 the call, W. THOMAS discussed his new plan to continue the casino. Specifically, W. THOMAS
11 told the UM that he was going to acquire tools and bring them back from Rancho Cucamonga. W.
12 THOMAS said that selling the tools would be a front and he would build a wall. W. THOMAS said
13 that behind the wall he would place the casino. During the conversation, W. THOMAS claimed he
14 found a place in the U.S. where he could purchase more of the fish game machines.

15 133. Based on the above, in addition to the drug evidence being sought at W. THOMAS's
16 residence, I believe that evidence of W. THOMAS illegal gambling operation, in violation Title 18,
17 United States Code, Section 1955, will be located at W. THOMAS residence. This evidence includes
18 but not limited to machines and electronics used for gambling, purchase receipts for the equipment,
19 business records, records and information regarding Skillmine.net, bank records and other evidence
20 related to illegal gambling.

21 134. Based on the above, there is also probable cause to search W.THOMAS' residence
22 for violations of 18 U.S.C. 1962(c),(d) (Racketeer Influenced and Corrupt Organizations/Conspiracy)
23 including indicia of W.THOMAS membership and participation in the WSC, as well as evidence of
24 his agreement to violate section 1962(c), and his participation in the conduct of the WSC's affairs
25 through a pattern of racketeering activity in violation of section 1962(c).

26 **H. November 1, 2017 Four Pound Methamphetamine Seizure (PC to Arrest**
27 **FERNANDEZ and to Search the Residences of T. THOMAS AND K.PIERSON)**

1 135. On October 31, 2017, at approximately 1609 hours, agents intercepted an outgoing call
2 on TT#1 from Augustus CRAWFORD to Telephone Number (701) 240-2787, belonging to Tommie
3 THOMAS (hereinafter, "T.THOMAS's Phone") (Call#5677). During the call, CRAWFORD told
4 T.THOMAS his boy said, "The shit touched down right, he said give me like, \$3,000 or something so
5 you could go send that to his boy." T.THOMAS asked CRAWFORD where he was, and
6 CRAWFORD said he was on the freeway passing Delano. T.THOMAS told CRAWFORD, "When
7 he get here call me."

8 136. On October 31, 2017, at approximately 1704 hours, agents intercepted an incoming
9 call on TT#1 to CRAWFORD from T.THOMAS's Phone (Call#5681). During the call,
10 CRAWFORD said he was pulling up and was in front of Merle Haggard. T.THOMAS said he did
11 not know it took two hours to get from Delano. CRAWFORD said there was a wreck on the freeway
12 and he needed to get gas. T.THOMAS told CRAWFORD to call him when he arrived.

13 137. On October 31, 2017, at approximately 1758 hours, agents intercepted an outgoing call
14 on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#5695). During the call, T.THOMAS
15 asked CRAWFORD where he was and CRAWFORD says he is waiting on "bitch" to bring the car.
16 CRAWFORD told T.THOMAS he told "Anna" he needed her car because the other car had bullet
17 holes in it. CRAWFORD told T.THOMAS, "But the Mexican nigga said, he said, if not tonight, he
18 said it's still for your price, but it's mandatory for the morning. He said it's eight-thirty for the
19 morning. He said his people don't like doing business this late." T.THOMAS said, "yeah that's
20 cool." CRAWFORD said, "But he said it's your price, but it has to be eight-thirty in the morning."
21 CRAWFORD asked T.THOMAS where he was at and T.THOMAS said he was on the block.
22 CRAWFORD said he was going to get some "wheels" and go over to T.THOMAS.

23 138. Based on my knowledge of this investigation and the content of the intercepted calls, I
24 believe CRAWFORD is assisting T.THOMAS with the purchase of drugs from one of
25 CRAWFORD's drug suppliers. CRAWFORD advised T.THOMAS that he would meet with his
26 supplier in the morning and call T.THOMAS when they were ready. Based on my training and
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1 experience, I am aware that gang members involved in the sale of narcotics, will often have multiple
2 drug sources of supply. Based on my training and experience, I am aware that gang members will
3 share their drug sources of supply for the benefit of the gang and their fellow gang members. The
4 money generated from the sale of narcotics will allow the gang to gain an elevated status and increase
5 the gang's wealth as a whole. This elevated status and will assist the gang in recruiting new gang
6 members, afford to purchase firearms for protections and fund future criminal endeavors.

7 139. On October 31, 2017, at approximately 1828 hours, agents intercepted an outgoing
8 call on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#5702). During the call,
9 CRAWFORD asked T.THOMAS if he was on Donna.¹⁰ T.THOMAS says no and CRAWFORD said
10 he was about to pull up on Donna. T.THOMAS asked CRAWFORD if he had some weed.
11 CRAWFORD said, "Do I smoke nigga?" CRAWFORD told T.THOMAS he was about to "drop
12 something off real quick on Donna." During the call, it sounded as if CRAWFORD answered an
13 incoming call, although it was not intercepted. CRAWFORD said, "No that was my boy, he just said
14 tonight nine o'clock fo sho. He said fo sho tonight." T.THOMAS said "Hugh," "He said tonight
15 now." CRAWFORD said, "I guess tonight at nine. He said tonight if you want to do it at nine, if you
16 want to do it at nine." T.THOMAS said, "No, tell him tomorrow. I don't care what they say."
17 T.THOMAS said during the day time. T.THOMAS agreed to 8:30.

18 140. On October 31, 2017, at approximately 1839 hours, agents intercepted an outgoing call
19 on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#5704). During the call, CRAWFORD
20 told T.THOMAS, "My boy can get there by eight, is that better, or should I tell him tomorrow."
21 T.THOMAS said, "Tomorrow." CRAWFORD asked T.THOMAS, where are you niggas at, I'm on
22 the Ave. T.THOMAS said he is going to go to his baby momma's house. CRAWFORD told
23 T.THOMAS to let him know because he is in the hood.

24 141. Based on my knowledge of this investigation and the content of the call, I believe
25 CRAWFORD is talking to T.THOMAS about his source of supply when he said "My boy.." Based

26
27 ¹⁰ As noted above, Agents are aware that T.THOMAS resides at 204 Donna Avenue.

1 on the calls, I believe when CRAWFORD said, “My boy can get there by eight, is that better..”, that
2 T.THOMAS thought that was too late and then preferred to meet tomorrow. Both CRAWFORD and
3 T.THOMAS agreed to meet with the drug source in the morning at CRAWFORD’S residence, which
4 is located at 320 4th St (previously identified by agents as CRAWFORD’S residence).

5 142. Based on the previous calls intercepted on TT#1, between CRAWFORD and
6 T.THOMAS ON 10/31/17, agents conducted an early morning briefing and responded to 320 4th St.
7 Bakersfield (hereinafter, “CRAWFORD’S Residence”) during the morning of November 1, 2017. At
8 0730 hours, Agents arrived at CRAWFORD’S Residence and established surveillance.

9 143. On November 1, 2017, at approximately 0749 hours, agents intercepted an outgoing
10 text message on TT#1 from CRAWFORD to T.THOMAS’S Phone (Call#5776), which read, “They
11 on they way.”

12 144. Based on my knowledge of this investigation and the previous intercepted calls made
13 on October 31, 2107, I believe CRAWFORD was referring to his drug source being on his way to
14 meet with him.

15 145. At 0752 hours, SA Compston was monitoring a court-authorized pole camera at
16 CRAWFORD’S Residence and observed a black VW sedan, believed to be a vehicle used by
17 CRAWFORD (hereinafter, “CRAWFORD’S Vehicle”), arrive and park in front of the residence.

18 146. At 0758 hours, SA Compston was monitoring the pole camera at CRAWFORD’S
19 Residence and observed an African American male walk from the front of CRAWFORD’S Residence
20 and get into the right front passenger side of CRAWFORD’S vehicle. The vehicle then made a u-turn
21 on 4th St and then drove north on V St. Agents followed the vehicle as it traveled north on San Dimas
22 St from 34th St, and lost sight of the vehicle at approximately 0810 hours.

23 147. On November 1, 2017, at approximately 0759 hours, agents intercepted an incoming
24 text message on TT#1 to CRAWFORD from T.THOMAS’S Phone (Call#5821), which read, “Ok.”

25 148. At 0810 hours, Officer Sanchez was driving north on San Dimas St and observed
26 CRAWFORD’S Vehicle traveling east on 36th St to South San Dimas St. Agents followed
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1 CRAWFORD back to CRAWFORD's Residence. At 0814 hours, SA Compston monitored the pole
2 camera at CRAWFORD's Residence and observed CRAWFORD's Vehicle travel west on 4th St and
3 make a u-turn in front of the residence. At the same time, CRAWFORD arrived in CRAWFORD's
4 vehicle, a silver Nissan sedan pulled to the curb in front of CRAWFORD's residence. CRAWFORD
5 was wearing a red hoody, red shoes and jeans. The driver of the Nissan was later identified as Luis
6 FERNANDEZ.¹¹ CRAWFORD and FERNANDEZ could be seen on the camera talking near the
7 Nissan.

8 149. On November 1, 2017, at approximately 0817 hours, agents intercepted an outgoing
9 call on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#5863). As T.THOMAS answered
10 the phone, CRAWFORD said, "Aye look this is my boy." FERNANDEZ then got on the phone¹²
11 and said, "Hey what's up man." T.THOMAS also greeted FERNANDEZ. FERNANDEZ asked
12 T.THOMAS, "What's good yo, you almost here." T.THOMAS initially said he would meet them
13 shortly and then told FERNANDEZ to tell "AJ" (CRAWFORD'S known moniker) to go to Beale
14 Park. FERNANDEZ was hesitant because he said his son was with him in the car. FERNANDEZ
15 said, "I got my son, my son with me so I aint trying to do a lot of things." T.THOMAS insisted that
16 FERNANDEZ go to Beale Park, although FERNANDEZ sounded nervous he agreed to go to Beale
17 Park with CRAWFORD.

18 150. I believe CRAWFORD placed T.THOMAS on the phone with FERNANDEZ because
19 CRAWFORD was assisting T.THOMAS with meeting his drug source of supply.

20 151. At 0819 hours, SA Pacheco drove past CRAWFORD's Residence, and having
21 previously seen a DMV photograph of Augustus CRAWFORD, he positively identified him. SA
22 Pacheco also described FERNANDEZ as a Hispanic male, wearing a gray hoody sweater and red

23
24 ¹¹ As set forth more fully below, FERNANDEZ was identified during traffic stop subsequent the
suspected methamphetamine deal.

25 ¹² Based on surveillance observations, CRAWFORD and FERNANDEZ were together in or near the
26 Nissan later identified as being driven by FERNANDEZ. Additionally, Agents later listened to
27 FERNANDEZ's voice after an interview, confirming it was the same voice placed on
28 CRAWFORD's phone while speaking with T.THOMAS.

1 undershirt. The Nissan did not have a license plate and only had paper plates.

2 152. At 0822 hours, CRAWFORD got into FERNANDEZ' Nissan and they drove west on
3 4th St. Agents followed the vehicle as it traveled toward Beale Park, which is located at 1904 Palm
4 St. The Nissan traveled to the north side of the park and stopped along the right curb of Dracena St
5 east of Oleander Ave. at 0827 hours.

6 153. On November 1, 2017, at approximately 0824 hours, agents intercepted an outgoing
7 text message on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#5873), which read, "We
8 here."

9 154. On November 1, 2017, at approximately 0824 hours, agents intercepted an incoming
10 call on TT#1 to CRAWFORD from T.THOMAS's Phone (Call#5875). During the call,
11 CRAWFORD told T.THOMAS they were at Beale Park.

12 155. On November 1, 2017, at approximately 0830 hours, agents intercepted an outgoing
13 text message on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#5878), which read, "Wssp
14 this nikkaz paranoid."

15 156. I believe T.THOMAS was referring to FERNANDEZ initially being hesitant on
16 meeting T.THOMAS at Beale Park.

17 157. On November 1, 2017, at approximately 0833 hours, agents intercepted an incoming
18 call on TT#1 to CRAWFORD from T.THOMAS's Phone (Call#5880). During the call, T.THOMAS
19 asked where CRAWFORD was at the stated they were at Beale Park. T.THOMAS said he was at the
20 weed shop and would go over to CRAWFORD.

21 158. At 0840 hours, as Officer Sanchez was parked on Oleander Street south of Dracena St.
22 watching the Nissan, he observed an African American male, wearing a hoody sweatshirt, walking
23 toward the Nissan from the west and enter the Nissan. The subject was later confirmed to be
24 T.THOMAS, based on surveillance observations, however Officer Sanchez was unable to see how he
25 arrived.

26 159. I believe T.THOMAS arrived at Beale Park in order to be introduced to one of
27
28

1 CRAWFORD's drug sources, later identified as Luis FERNANDEZ, who was the driver of the
2 Nissan.

3 160. At 0850 hours, Officer Sanchez observed the Nissan make a U-turn and travel west on
4 Dracena St. Agents followed the vehicle as it traveled toward 3030 Verde St. At 0854 hours, Agents
5 followed the vehicle to 3030 Verde St. After the vehicle parked along the northwest area of the
6 parking lot, Officer Sanchez observed the right front passenger of the vehicle, later identified as
7 T.THOMAS, enter the center staircase and enter the southeast apartment on the second floor of the
8 apartment building, which is visible from Verde St. Officer Sanchez observed T. THOMAS open the
9 front door to the apartment and enter. Based on my knowledge of this investigation, I am aware that
10 Kristi PIERSON, who is T.THOMAS' girlfriend, resides at 3030 Verde St Apt 19. Apartment 19 is
11 located in the same area surveillance agents observed T. THOMAS enter. I am also aware that Kristi
12 PIERSON's brother is Gary PIERSON, who is also an active WSC member, however G. PIERSON
13 does not live at the Verde Apartments.

14 161. At 0859 hours, Officer Sanchez observed T.THOMAS exit the upstairs apartment and
15 walk down to CRAWFORD and FERNANDEZ, who were still inside the vehicle. At 0912 hours,
16 Officer Riddle observed all three subjects exit the Nissan and stand along the driver's side of the
17 vehicle talking.

18 162. On November 1, 2017, at approximately 0912 hours, agents intercepted an outgoing
19 text message on TT#1 from CRAWFORD to Telephone Number (661) 599-9741, belonging to Gary
20 PIERSON¹³ (Call#5888) which read, "We rii here nikka."

21 163. At 0915 hours, Officer Riddle observed as FERNANDEZ leaned into the open rear
22 door and appeared to be doing something. Based on intercepted calls and later observations made by
23 surveillance agents, I believe FERNANDEZ had his young son inside the Nissan when he picked up
24 _____

25 ¹³ The investigative team knows G.PIERSON to be the user of 661-599-9741. On October 22, 2017
26 during a physical surveillance, investigators observed G.PIERSON at which time they conducted a
27 ruse call to telephone number 661-599-9741 and were able to confirm he was the user of the
28 telephone

1 CRAWFORD and THOMAS for the deal.

2 164. On November 1, 2017, at approximately 0922 hours, agents intercepted an outgoing
3 call on TT#1, which was being used by T.THOMAS, to Telephone Number (661) 526-8024,
4 belonging to Kristi PEIRSON¹⁴ (Call#5890). During the call, T.THOMAS asked where K.
5 PEIRSON was at, and K. PEIRSON said she was waiting on the bank to open. K. PEIRSON told
6 T.THOMAS the bank did not open until 10 on Wednesdays. T.THOMAS said, “Ok come to the spot,
7 the apartment.”

8 165. Based on my knowledge of this investigation, I believe K. PEIRSON was at an
9 unidentified bank for the purpose of withdrawing money for T. THOMAS. Based on the timing of
10 the drug deal, occurring after K. PEIRSON returned to the apartment, I believe the money would
11 have been used for the purchase of drugs from FERNANDEZ.

12 166. At 0928 hours, Officer Sanchez observed a 2010 black Dodge Avenger pull into the
13 Verde St parking lot entrance to the apartment complex. The vehicle’s license plate was 6LYW276
14 (r/o Pierson Valerie or Gary Pierson, 1321 N St.). The vehicle parked along the northwest corner of
15 the lot. Officer Sanchez observed the driver wearing a maroon-colored long sleeve shirt and black
16 leggings. Officer Sanchez had previously seen a DMV photograph of K.PIERSON and positively
17 identified her as the driver of the Avenger. Agents also believe through this investigation that
18 K.PIERSON is resides at 3030 Verde St Apt 19. Officer Sanchez observed K. PEIRSON enter the
19 staircase, located along the south side of the north building of the apartment complex. PEIRSON
20 walked up to the second floor of the staircase landing and opened the white security screen door to
21 the apartment and walked inside. The door to the apartment is located along the southwest corner of
22 the second floor staircase and can be seen from Verde St.

23 _____
24 ¹⁴ The investigative team knows K.PIERSON to be the user of 661-524-8024 due to the phone being
25 subscribed to Valerie PEIRSON (Kristi’s mother) as reflected in the open source database “CLEAR”.
26 Additionally, as intercepted in call number 55 on TT#4 (WHATLEY’s phone) being referred to as
27 “Kristi” in the intercepted text message. I also know based on my experience with the current
28 investigation that K.PIERSON is T.THOMAS’s girlfriend.

1 167. At 0931 hours, Officer Sanchez observed K. PIERSON exit the apartment complex
2 and depart in the Avenger. Prior to leaving the parking lot, Officer Sanchez observed T.THOMAS
3 walk over to her vehicle and they engaged in a brief conversation.

4 168. At 0935 hours, Officer Sanchez observed K. PIERSON arrive back at the apartment in
5 the Avenger. CRAWFORD and T. THOMAS exited the front door of the apartment and walked
6 down the stairs, as K. PIERSON walked upstairs and into the apartment. CRAWFORD and T.
7 THOMAS walked over to the Nissan.

8 169. At 0949 hours, Officer Sanchez observed an additional male, who he later identified as
9 documented WSC member J.T., emerge from the north side of the Nissan. J.T. was wearing a black
10 hat, blue shirt and blue jeans. Having previously seen a DMV photograph of J.T., Officer Sanchez
11 positively identified him. J.T. was carrying a white plastic grocery bag and placed it on the trunk of
12 the Nissan. The group congregated along the north side of the Nissan. Neither Officer Sanchez nor
13 Officer Riddle was able to determine how J.T. arrived at the complex.

14 170. At 0953 hours, Officer Sanchez observed T.THOMAS, J.T. and CRAWFORD all
15 walk into the upstairs apartment unit. At 0956 hours, Officer Riddle observed FERNANDEZ enter
16 the driver seat of the Nissan and back out of the stall and travel toward the east alley. Law
17 enforcement followed the Nissan.

18 171. On November 1, 2017, at approximately 1011 hours, agents intercepted an outgoing
19 call on TT#1 from CRAWFORD to Telephone Number (661) 526-8024, belonging to Kristi
20 PEIRSON (Call#5894). During the call, PIERSON said she was pulling up, crossing over Palm. An
21 unknown male voice in the background could be heard saying, "You see that." CRAWFORD told K.
22 PIERSON to go to him and she said okay.

23 172. At 1018 hours, law enforcement observed the Nissan back out of the garage and drive
24 away. Law enforcement followed the vehicle to the McDonalds, located at 4601 Coffee Rd.

25 173. At 1020 hours, Officer Sanchez observed K. PIERSON and a yet to be identified
26 African American female exit the apartment and got into the Dodge Avenger. Officer Sanchez
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1 observed the vehicle drive out of the parking lot. At 1025 hours, Officer Sanchez observed the
2 Avenger arrive back at the apartment.

3 174. At 1027 hours, Officer Riddle observed the Nissan depart the McDonalds drive thru.
4 Agents followed the vehicle away. At 1030 hours, Officer Riddle observed the Nissan arrive at 2700
5 Feather River Drive. Officer Riddle observed the driver of the vehicle exit and hand a bag of food to
6 an unknown female from the residence. A child also exited from the vehicle and walked inside the
7 front door of the residence with the female. FERNANDEZ then drove away from the residence and
8 agents followed it.

9 175. At 1043 hours, Agents followed FERNANDEZ to the Albertsons parking lot, located
10 at 1520 Brundage Ln. FERNANDEZ remained inside the vehicle. At 1047 hours, Officer Riddle
11 observed the Nissan move from the Albertsons parking lot, to the Walgreens parking lot, located
12 across the street at 40 Chester Ave. Agents followed the vehicle into the Walgreens parking lot and
13 established surveillance.

14 176. At 1107 hours, SA Compston positioned his vehicle in the parking lot, which provided
15 him a rear view of FERNANDEZ' Nissan. Officer Riddle then observed a black colored 2017
16 Toyota Sedan, with a Ca. license plate of 7UIS222 (r/o Ramirez Brenda Gonzalez or Meza Ajejandro
17 Ramirez, 1910 Garces Hwy Apt D7) arrive and park along the driver side of the Nissan, facing in the
18 opposite direction. Officer Riddle observed the driver of the Toyota exit the vehicle and open the left
19 rear door of his vehicle. The driver then retrieved a small bag after opening the left rear passenger
20 door. The subject then handed it to FERNANDEZ through his open driver side window. After
21 handing FERNANDEZ the bag, the driver of the Toyota drove away from the area. Surveillance let
22 the Toyota go and followed FERNANDEZ as he traveled north on Chester Ave.

23 177. SA Silveira contacted BPD Officers James and Orozco and requested they conduct an
24 enforcement stop on FERNANDEZ. Officer James and Orozco were working together in a fully
25 marked BPD patrol vehicle.

26 178. At 1109 hours, as FERNANDEZ approached 4th Street, the BPD patrol vehicle began
27
28

1 to accelerate to the rear of FERNANDEZ, FERNANDEZ turned west onto 4th St and immediately
2 turned north onto the alley just west of Chester Ave. At that time, Officer James activated the patrol
3 vehicle's overhead lights and initiated an enforcement stop on FERNANDEZ. FERNANDEZ
4 stopped his vehicle in the alley and was contacted by BPD Officers. Officer Orozco made contact
5 with the driver of the vehicle, who was identified as Luis FERNANDEZ. FERNANDEZ was
6 determined to have a suspended California driver's license and was also the registered owner of the
7 vehicle. During the course of the enforcement stop, Officer James located a tan pillowcase on the
8 right rear floorboard of the vehicle. Officer James looked inside the pillowcase and observed four
9 clear plastic bags, each containing a white crystalline substance, believed to be methamphetamine,
10 one brown leather pistol holster and \$3800 dollars in cash.

11 179. Based on the content of the intercepted calls, and observations made by agents, I
12 believe FERNANDEZ was picking up the methamphetamine from the driver of the Toyota, for the
13 purpose of selling it to T.THOMAS and J.T. I believe CRAWFORD helped facilitate the drug deal
14 between T.THOMAS, J.T. and FERNANDEZ, by making the introduction to T. THOMAS at Beale
15 Park.

16 180. Based on the above intercepted call, surveillance observations I believe there is
17 probable cause to arrest FERNANDEZ for violations of Title 21, United States Code, Section
18 841(a)(1) possession with intent to distribute methamphetamine.

19 181. Additionally, based on the facts set forth above and in Section III ("Evidence Likely to
20 be Recovered at the Subject Premises"), I believe there is probable cause to search
21 T.THOMAS's/Kristi PIERSON's Residence (3030 Verde Street #19, Bakersfield, CA) for evidence
22 of narcotics trafficking.

23 182. Additionally, as evidenced by T.THOMAS conspiring with other WSC members to
24 conduct this racketeering activity, as well as the facts and opinions set forth in Section III ("Evidence
25 Likely to be Recovered at the Subject Premises"), I believe evidence of gang membership will be
26 located at T. THOMAS' residence. Consequently, there is also probable cause to search

1 T.THOMAS's residence for violations of 18 U.S.C. § 1962(c)(d) (Racketeer Influenced and Corrupt
2 Organizations) including indicia of T.THOMAS' membership and participation in the WSC, as well
3 as evidence of his agreement to violate section 1962(c), and his participation in the conduct of the
4 WSC's affairs through a pattern of racketeering activity in violation of section 1962(c). (Additional
5 probable cause supporting the search of this location is in sections V(H),(I),(J) and (O) below).

6 **I. November 1, 2017, Receipt of Payment for Narcotics Shipped to North Dakota (PC to**
7 **search T.THOMAS's Residence)**

8 183. On November 1, 2017, at approximately 1328 hours, agents intercepted an outgoing
9 text message on TT#1 from CRAWFORD to Telephone Number (701) 389-1510, belonging to
10 UM388 "POOH"¹⁵ (hereinafter referred to as "POOH's Phone") (Call#5923), which read, "Nikka u
11 got it."

12 184. On November 1, 2017, at approximately 1405 hours, agents intercepted an incoming
13 call on TT#1 to CRAWFORD from POOH's Phone (Call#5926). During the call, CRAWFORD
14 answered the phone and both subjects joked around with each other. POOH said, "Yeah nigga I got
15 it, I beat your ass nigga, who you talking too." CRAWFORD said, "You got me fucked up nigga, I
16 aint TAPP nigga." POOH then said, "Hey, yeah I got it Cuz, I'll (UI) you that money right now."
17 The two joked around and laughed on the phone for a few seconds and then CRAWFORD said,
18 "Listen, Im gonna send you another one." POOH said, "Yeah on on it man just come with it I got
19 you." CRAWFORD said, "Alright."

20 185. Based on my knowledge of a past investigation by FBI Minneapolis, I know that Crip
21 gang members from Bakersfield have in the past sent packages of methamphetamine to North
22 Dakota. When POOH said, "Hey, yeah I got it Cuz, I'll (UI) you that money right now" and
23 CRAWFORD replied by saying "Listen, Im gonna send you another one," I believe this to mean that
24 CRAWFORD mailed POOH a package of methamphetamine and POOH was telling CRAWFORD
25

26 ¹⁵The investigative team has identified the user of 701-389-1510 as "POOH". On November 2, 2017,
27 as intercepted over CRAWFORD's TT#1, CRAWFORD referred to UM388 as "POOH".

1 that he has “it” and he would now send money to CRAWFORD for the drugs. When POOH told
2 CRAWFORD, “Yeah on on it man just come with it I got you”, I believe this to mean that POOH is
3 telling CRAWFORD to keep sending the methamphetamine packages and that POOH would keep
4 sending CRAWFORD money. In the beginning of the call, when POOH said, “Yeah nigga I got it, I
5 beat your ass nigga, who you talking too” and CRAWFORD said, “You got me fucked up nigga, I
6 aint TAPP nigga” I believe this is a follow up conversation to the text message that CRAWFORD had
7 previously sent to POOH which read, ““Nikka u got it.” I believe when CRAWFORD said, ““You
8 got me fucked up nigga, I aint TAPP nigga”, I believe this to mean CRAWFORD is telling POOH
9 that POOH could not beat CRAWFORD’s ass as POOH stated previously. POOH then said, “Hey,
10 yeah I got it Cuz, I’ll (UI) you that money right now.” I believe POOH is confirming the receipt of a
11 quantity of drugs from CRAWFORD and that he would now send him “that money right now.”

12 186. The investigative team believes POOH is in North Dakota for several reasons.
13 POOH’s number of 701-389-1510 has the area code of “701” which is assigned to North Dakota.
14 Also, as intercepted on CRAWFORD’s TT#1 on November 2, 2017 (Call #6088), CRAWFORD
15 made an outgoing call to POOH at 701-389-1510. During the conversation, POOH said it was “10”
16 where he was at. CRAWFORD replied by saying it was “almost 8” where he was at. I know that
17 California exists in the PST zone while the vast majority of North Dakota exists in the CST zone,
18 which is two hours ahead of California. Also, on November 2, 2017, at approximately 1227 hours,
19 agents intercepted an outgoing call on TT#1 from CRAWFORD to Telephone Number (661) 221-
20 2940, belonging to Bryshanique ALLEN (Call#6264). During the call, CRAWFORD said, “Listen
21 the bitch is in Minot, N. Dakota.” As will be explained later, this telephone call was intercepted in
22 relation to CRAWFORD having ALLEN receive funds at WalMart from a female working with
23 POOH. I know Minot, ND is within the CST zone.

24 187. On November 1, 2017, at approximately 1457 hours, agents intercepted an outgoing
25 text message on TT#1 from CRAWFORD to POOH’s Phone (Call#5956) which contained the full
26 name of an individual hereinafter referred to as “A.H.” and another text message that read “Zip code
27
28

1 93311” (Call#5958).

2 188. Based on this investigation, including the calls and events set forth below, I believe
3 that CRAWFORD provided A.H.’s name to POOH so that POOH could provide his sender, located
4 in North Dakota the correct information of the person on the other end of the transaction, in this
5 instance, A.H..

6 189. On November 1, 2017, at approximately 1524 hours, agents intercepted an outgoing
7 text message on TT#1 from CRAWFORD to POOH’s Phone (Call#5976) which read, “We at
8 Walmart.”

9 190. On November 1, 2017, at approximately 1540 hours, agents intercepted an incoming
10 call on TT#1 to CRAWFORD from A.H.’s Phone (Call#5984).¹⁶ During the call, CRAWFORD said
11 he is getting the numbers from a dude. CRAWFORD said he could not leave because he had
12 “Tapp’s” money coming in A.H.’s name. CRAWFORD said he was waiting for the numbers.

13 191. Based on the content of the intercepted call and my knowledge of this investigation, I
14 am aware that T.THOMAS, aka “TAPP” is involved in the sale of drugs.¹⁷ (I believe the money
15 being sent via Walmart Money gram to A.H. was intended to be delivered to T.THOMAS. Further, I
16 am aware that gang members will assist fellow gang members with the collection of money from
17 drug transactions. I believe CRAWFORD is assisting T.THOMAS with the collection of money
18 from a drug transaction with POOH.

19 192. Based on my training and experience, as well as my conversations with other Agents
20 of CalDOJ, I know that drug traffickers prefer to utilize money transfers through WalMart because
21 they can have third parties, such as A.H., to send or receive payments and or drug proceeds. I believe
22 drug traffickers also use the WalMart money transfer service because the fee is relatively low

23
24 ¹⁶The investigative team has identified the user of 661-303-3926 as A.H.. On October 8, 2017,
25 surveillance observed A.H. with WHATLEY. Additionally, a query of 661-303-3926 in Facebook
26 revealed the A.H.’s Facebook page. As intercepted over WHATLEY’s TT#4, during session 3924 on
27 10/13/2017, WHATLEY called referred to A.H. by A.H.’s first name.

28 ¹⁷As noted above, T.THOMAS was involved in the sale of methamphetamine with CRAWFORD to
CRI#1 on November 3, 2017. Additionally, as noted above, T.THOMAS conspired with
CRAWFORD to purchase methamphetamine from Luis FERNANDEZ on November 1, 2017.

1 compared to other such services. I also know that a bank account does not have to be tied to the
2 money transfer, which makes it hard for funds to be tracked by law enforcement.

3 193. On November 1, 2017, at approximately 1611 hours, agents intercepted an incoming
4 forwarded text message on TT#1 to CRAWFORD from T.THOMAS's Phone (Call#6006) which
5 read, "Fwd: Alyssa Marie gortarez."

6 194. On November 1, 2017, at approximately 1612 hours, agents intercepted an incoming
7 forwarded text message on TT#1 to CRAWFORD from T.THOMAS's Phone (Call#6008) which
8 read, "671220447."

9 195. I believe "Fwd: Alyssa Marie gortarez" is the name of the female that POOH is using
10 in North Dakota to send money to CRAWFORD and T.THOMAS through A.H. I believe the number
11 "671220447" is significant to the transaction at WalMart.

12 196. At 1615 hours, Officer Anderson observed the black 2010 Dodge Avenger, CA license
13 plate 6LYW276 (Pierson Valerie or Gary Pierson, 1321 N St) parked near the east entrance to the
14 Walmart. Officer Anderson observed CRAWFORD and Jarvis THOMAS exit the vehicle and walk
15 into the east entrance to the Walmart. SA Pacheco walked into the Walmart and located
16 CRAWFORD near the customer service area.

17 197. At 1624 hours, SA Silveira observed A.H. walking into the Walmart store. SA
18 Silveira has previously seen a DMV photograph of A.H. and positively identified A.H.

19 198. At 1627 hours, Officer Sanchez observed the Volvo driving south through the
20 Walmart parking lot. Officer Sanchez also observed the black Avenger leaving the parked lot. The
21 vehicle traveled south on Coffee Rd, followed by agents. At 1645 hours, Agents followed the
22 Avenger to the Kentos Mandarin BBQ parking lot. The Avenger was parked in front of the business.

23 199. At 1649 hours, SA Pacheco observed Augustus CRAWFORD, Tommie THOMAS
24 and Jarvis THOMAS exit the restaurant and enter the Avenger. The vehicle exited the parking lot
25 and drove toward 3030 Verde St (Kristi PIERSON's Residence). At 1703 hours, the Avenger arrived
26 at 3030 Verde St and pulled into the parking lot of the apartment complex. Agents established
27

1 surveillance on the complex. Agents remained at the complex for a few minutes and then
2 discontinued surveillance at 1718 hours.

3 200. Based on the intercepted calls and observation made by surveillance agents, BPD
4 Officer Poteete responded to the Walmart store, located at 8400 Rosedale Hwy. Officer Poteete
5 contacted loss prevention and requested video surveillance of the transaction made by A.H. Officer
6 Poteete received a copy of the receipt for the transaction, which was dated November 1, 2017 at 1621
7 hours. The transaction was for the amount of \$2500 dollars, paid to A.H. and it included A.H.'s
8 signature. The receipt listed St# 2557 QP#00003137 TE#93 TR#00764.

9 201. Officer Sanchez reviewed the video surveillance footage from the Wal-Mart
10 transaction. The video showed A.H. standing at the service and CRAWFORD standing to the left of
11 A.H. At 1623 hours, the service representative counted out the money in front of A.H. and A.H.
12 picked it up off the counter. After retrieving the money, A.H. and CRAWFORD walk out of view of
13 the camera. At 1624 hours, A.H. and CRAWFORD walked out of the Marketplace exit of the Wal-
14 Mart. CRAWFORD can was carrying a white transaction receipt in his left hand as they walked out
15 of the Wal-Mart.

16 202. In summary, on November 1, 2017, Augustus CRAWFORD arranged the transfer of
17 \$2500 dollars from POOH via Walmart money gram. As detailed earlier, your Affiant believes that
18 POOH was located in North Dakota at the time of this money transfer. Based on the content of the
19 intercepted calls, I believe CRAWFORD contacted A.H. and instructed her to pick up the money for
20 him. I believe CRAWFORD used A.H. in order to avoid being detected by law enforcement. Based
21 on my knowledge of this investigation, I am aware that T.THOMAS and CRAWFORD are both
22 involved in the sale and distribution of narcotics. I believe the money being sent to T.THOMAS, via
23 CRAWFORD and A.H., was for payment of narcotics that were sent to POOH.

24 203. There is probable cause to search T.THOMAS's residence for evidence of violations
25 of 18 U.S.C. § 1956(a)(1) (money laundering). Given that T.THOMAS is a documented WSC
26 member and is conspiring to engage in this racketeering activity with WSC members and WSC
27

1 associates, there is also probable cause to believe that evidence of violations of 18 U.S.C. §
 2 1962(c),(d) (Racketeer Influenced and Corrupt Organizations) including indicia of T.THOMAS’s and
 3 others’ membership and participation in the WSC, as well as evidence of his agreement to violate
 4 section 1962(c) in violation of section 1962(d), and his participation in the conduct of the WSC’s
 5 affairs through a pattern of racketeering activity in violation of section 1962(c) will be found at
 6 T.THOMAS’s residence.

7 **J. November 1-2, 2017 Receipt of Payment for Narcotics Shipped to North Dakota**
 8 ***(Probable Cause to Arrest ALLEN and to Search T.THOMAS’s Residence)***

9 204. During November 1-2, 2017 agents intercepted a series of calls and text messages on
 10 TT#1 as set forth in the table below. CRAWFORD coordinated the transfer of money from POOH,
 11 who, as explained above, is located in North Dakota.

DATE	TIME	TO	FROM	TEXT MESSAGE
11/1/17	1632	POOH’s Phone	TT#1 (CRAWFORD)	“U got it.”
11/1/17	1655	POOH’s Phone	TT#1 (CRAWFORD)	“Wssp.”
11/1/17	1728	TT#1 (CRAWFORD)	POOH’s Phone	Bryshanique keontranee alken.”
11/1/17	1732	POOH’s Phone	TT#1 (CRAWFORD)	“Allen.”

23
 24 205. Based on my knowledge of this investigation, I am aware that CRAWFORD has
 25 previously arranged the transfer of money via Walmart money gram with POOH. I believe in the
 26 messages above that POOH was confirming ALLEN’s name with CRAWFORD and CRAWFORD

1 corrected the spelling of ALLEN's last name. I believe that the two were discussing ALLEN because
 2 CRAWFORD intended to have ALLEN receive drug money from POOH in her name.

DATE	TIME	TO	FROM	TEXT MESSAGE
11/1/17	1747	TT#1 (CRAWFORD)	POOH's Phone	"Tru"
11/1/17	1808	POOH's Phone	TT#1 (CRAWFORD)	"Numbers"
11/1/17	1808	TT#1 (CRAWFORD)	POOH's Phone	"Nigga hold up"
11/1/17	1809	POOH's Phone	TT#1 (CRAWFORD)	"Ok cus im wit the bitch rii now"
11/1/17	1859	POOH's Phone	TT#1 (CRAWFORD)	"?"
11/1/17	1900	TT#1 (CRAWFORD)	POOH's Phone	"Wassup"
11/1/17	1900	POOH's Phone	TT#1 (CRAWFORD)	"Numbers"

20 206. On November 1, 2017, at approximately 1937 hours, agents intercepted an outgoing
 21 call on TT#1 from CRAWFORD to POOH's Phone (Call#6088). During the call, POOH and
 22 CRAWFORD greeted each other and CRAWFORD said, "What's up Nigga, what's up with the
 23 numbers." POOH told CRAWFORD he was waiting to make sure he had "mother fucka" with him.
 24 POOH joked about kicking CRAWFORD's ass and CRAWFORD asked POOH to Facetime. POOH
 25 declined to FaceTime CRAWFORD. POOH said he would have it for him in a minute and
 26 CRAWFORD told POOH to hurry up, because it was late. As detailed earlier, POOH said it was

1 almost 10 where he was at and CRAWFORD said it was almost 8 where he was at. As explained
2 earlier, I believe this supports the belief that POOH is in North Dakota, as I know much of North
3 Dakota is located within the CST zone which is two hours ahead of California. I believe when
4 CRAWFORD said, “what’s up with the numbers”, I believe CRAWFORD was asking POOH for the
5 necessary numbers specific to a WalMart money transfer they intended to complete.

6 207. On November 1, 2017, at approximately 1959 hours, agents intercepted an incoming
7 call on TT#1 to CRAWFORD from POOH’s Phone (Call#6090). During the call, POOH asked
8 CRAWFORD, “Hey is that nigga Double with you?” CRAWFORD told POOH that T.THOMAS
9 was around the corner but he could go get him. POOH said T.THOMAS was not answering his
10 phone. CRAWFORD said T.THOMAS was at home with his wife and was not going to answer the
11 phone. POOH asked who would get the money. CRAWFORD said he was going to get the money
12 and told POOH to send the numbers. POOH told CRAWFORD he better not run off with his “shit”
13 or he would “beat his ass.” CRAWFORD said to text the numbers and “the bitch name.” POOH said
14 he already “had bitch name.” CRAWFORD asked if it's the “same bitch?” POOH said he was going
15 to text it.

16 208. Based on my knowledge of this investigation, I am aware that T.THOMAS and
17 CRAWFORD have both been receiving money via Walmart money gram from POOH. As
18 mentioned earlier I know T. THOMAS has a gang moniker of “TAPP”. I believe CRAWFORD has
19 asked POOH to send him the transaction number and the female’s name who will be sending
20 CRAWFORD the money. I believe the money being sent to CRAWFORD is for drugs that have
21 been previously sent to POOH.

22 209. On November 1, 2017, at approximately 2002 hours, agents intercepted an incoming
23 text message on TT#1 to CRAWFORD from POOH’s Phone (Call#6093) which read, “871293648
24 dranelle mock.” I believe “871293648 dranelle mock” is the number connected with the planned
25 WalMart money transfer as well as the name of the female POOH would have send the money.

26 210. On November 1, 2017, at approximately 2004 hours, agents intercepted an incoming
27
28

1 call on TT#1 to CRAWFORD from POOH's Phone (Call#6096). During the call, POOH asked
2 CRAWFORD if he "got it", and CRAWFORD said he "got it" and was going to "get it right now."

3 211. I believe POOH was referring to the name and numbers he sent to CRAWFORD and
4 CRAWFORD confirmed he received them and would be going to get the money from the Walmart.

5 212. On November 1, 2017, at approximately 2014 hours, agents intercepted an outgoing
6 text message on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#6101) which read, "I got the
7 money."

8 213. On November 1, 2017, at approximately 2024 hours, agents intercepted an outgoing
9 call on TT#1 from CRAWFORD to POOH's Phone (Call#6103). During the call, CRAWFORD said
10 the money thing said they close at 7, but they open back up at 8. POOH said then you better be there.
11 CRAWFORD said he was just letting him know. POOH told him to just keep all that shit till the
12 morning. CRAWFORD asked if they still let him send it. POOH said yeah but it was about to close.
13 POOH told him to wait till the morning to grab it. POOH told CRAWFORD to keep the ID of
14 whoever was going to pick the money up so they could not pick it up without CRAWFORD.
15 CRAWFORD told him it's good and not to trip.

16 214. Based on the content of the intercepted calls and my knowledge of this investigation, I
17 believe CRAWFORD and POOH were unable to start the money transaction because the Walmart
18 Money gram services were already closed. I believe CRAWFORD and POOH agreed to complete
19 the transaction the following morning, November 2, 2017.⁶

20 215. On November 1, 2017, at approximately 2031 hours, agents intercepted an incoming
21 call on TT #1 to CRAWFORD from T.THOMAS's Phone (Call#6106). During the call,
22 CRAWFORD said he went to get the money, but nigga POOH said to go get it in the morning
23 because it was closed. CRAWFORD said they closed at 7 and would open at 8 in the morning.
24 THOMAS asked where CRAWFORD was, and CRAWFORD said he was by YumYums and was
25 taking "Bri" home. CRAWFORD told THOMAS he would pick him up and to be outside in 3
26 minutes.

1 216. Based on my knowledge of this investigation and the content of the intercepted
2 communications, I believe CRAWFORD was referring to Bryshanique ALLEN¹⁸, when he said he
3 had to take “Bri” home. I believe he had ALLEN with him because he intended on having ALLEN
4 receive the money from POOH, although the Walmart money gram services were closed.

5 217. On November 2, 2017, at approximately 0813 hours, agents intercepted an outgoing
6 text message on TT#1 from CRAWFORD to T.THOMAS’s Phone (Call#6179) which read, “Igot it.”

7 218. On November 2, 2017, at approximately 0826 hours, agents intercepted an outgoing
8 text message on TT#1 from CRAWFORD to POOH’s Phone (Call#6186) which read, “It’s not
9 workin.”

10 219. On November 2, 2017, at approximately 0827 hours, agents intercepted an outgoing
11 text message on TT#1 from CRAWFORD to T.THOMAS’s Phone (Call#6188) which read, “844-
12 832-1373.”

13 220. On November 2, 2017, at approximately 0855 hours, agents intercepted an outgoing
14 call on TT#1 from CRAWFORD to POOH’s Phone (Call#6201). During the call, CRAWFORD told
15 POOH there was a hold up with Walmart and CRAWFORD’s girl was given some phone numbers to
16 call. CRAWFORD said, “The bitch said there was a hold up, and I started to walk out the Walmart.
17 Fuck that shit.” Both subjects laughed. POOH asked if CRAWFORD still had “Baby” with him and
18 he said yes. POOH said he had his girl working on it and would let CRAWFORD know.

19 221. I believe CRAWFORD called POOH in order to advise him that there was some sort
20 of hold up at the Walmart store. POOH assured CRAWFORD he would call him when it was
21 resolved.

22 222. On November 2, 2017, at approximately 1129 hours, agents intercepted an incoming
23 call on TT#1 to CRAWFORD from T.THOMAS’s Phone (Call#6244). During the call, T.THOMAS

24
25 ¹⁸ The investigative team has determined ALLEN to be the user of 661-221-2940 through open
26 source queries and Title III interceptions. A query of the phone number in Zetx revealed the name
27 “Claurice Allen” During call number 1883 over CRAWFORD’s TT#1 on October 6, 2017,
28 CRAWFORD call the user of the telephone “Bri”. Additionally, ALLEN was identified through a
subsequent review of the WalMart surveillance video from November 2, 2017

1 told CRAWFORD to have “Bri” to call that number. T.THOMAS said they think there is “some
2 fraud going on.” T.THOMAS told CRAWFORD to instruct ALLEN to tell the Walmart associate
3 that the money is coming from her girlfriend and they had been dating for one year and CRAWFORD
4 agreed.

5 223. Based on my training and experience and my knowledge of this investigation, I
6 believe T.THOMAS was providing guidance to CRAWFORD on what to have ALLEN say to the
7 Walmart associate when she received the money.

8 224. On November 2, 2017, at approximately 1149 hours, agents intercepted an outgoing
9 call on TT#1 from CRAWFORD to Telephone Number (661) 221-2940, belonging to Bryshanique
10 ALLEN (Call#6249). During the call, CRAWFORD told ALLEN to call this number and tell them
11 you have been dating for a year. ALLEN said okay and asked CRAWFORD to send her the number.

12 225. Based on my training and experience and knowledge of this investigation, I believe
13 this call further demonstrates that ALLEN knew these funds were from an unlawful activity because
14 she agrees to lie to the Walmart representative about her relationship with the person who is sending
15 the funds.

16 226. On November 2, 2017, at approximately 1224 hours, agents intercepted an incoming
17 call on TT#1 to CRAWFORD from Telephone Number (661) 221-2940, belonging to Bryshanique
18 ALLEN (Call#6259). During the call, ALLEN told CRAWFORD she would need to either go to the
19 Walmart so the associate could make a copy of her ID, or ALLEN could email and fax a copy of the
20 ID card to Walmart. CRAWFORD said he would take a picture of the ID and send it to ALLEN.

21 227. I believe ALLEN needed to call CRAWFORD for a copy of her ID because
22 CRAWFORD was in possession of it. I believe CRAWFORD was in possession of ALLEN’s ID
23 because he was instructed to do so by POOH and to avoid being ripped off by ALLEN.

24 228. On November 2, 2017, at approximately 1225 hours, agents intercepted an incoming
25 call on TT#1 to CRAWFORD from T.THOMAS’s Phone (Call#6260). During the call,
26 CRAWFORD said, "I'm gonna send POOH a picture of the bitch ID's too, cause they just, now he's
27
28

1 talking about like making sure these bitches have been together and all kind weird shit." T.THOMAS
2 said, "Just call that nigga then." CRAWFORD said, "Alright."

3 229. On November 2, 2017, at approximately 1226 hours, agents intercepted an outgoing
4 call on TT#1 from CRAWFORD to POOH's Phone (Call#6262). During the call, CRAWFORD said,
5 "Hey Pooh, the people, the people want my bitch to send a picture of her ID, so I'ma see." POOH
6 said, "Yeah nigga." CRAWFORD said, "So listen, make sure that your bitch, that your bitch know
7 who the bitch is and that, 'cause if they start asking these weird ass questions like what's [UI]."
8 POOH said, "No she already, man look I already told you what to tell her. Tell 'em that's her
9 girlfriend, she needed help, and they been together for like a year and change man that's all she got to
10 tell 'em." CRAWFORD said, "Alright fo sho." POOH says "She already told 'em everything."
11 CRAWFORD said, "tell her that you already everything too they just say okay now send a picture of
12 your ID, I'm just letting you know." POOH said, "That's it that's all you gotta do, she gon', they gon'
13 release it to her." CRAWFORD said, "Alright" POOH said, "Yeah you good." CRAWFORD said,
14 "Alright" and POOH agreed.

15 230. On November 2, 2017, at approximately 1227 hours, agents intercepted an outgoing
16 call on TT#1 from CRAWFORD to Telephone Number (661) 221-2940, belonging to Bryshanique
17 ALLEN (Call#6264). During the call, CRAWFORD said, "Listen the bitch is in Minot, N. Dakota."
18 ALLEN told CRAWFORD that the Walmart guy needed the whole picture of the ID. CRAWFORD
19 said okay.

20 231. On November 2, 2017, at approximately 1322 hours, agents intercepted an outgoing
21 call on TT#1 from CRAWFORD to T.THOMAS's Phone (Call#6292). During the call,
22 CRAWFORD told T.THOMAS that a Walmart associate told ALLEN not to use the other "girl"
23 anymore because she had been red flagged. CRAWFORD said the associate stated, "Whatever you
24 all are doing, don't use her no more." CRAWFORD told T.THOMAS to call POOH and let him
25 know not to use the girl anymore. T.THOMAS told CRAWFORD that he needed to "start working
26 burner phones" and CRAWFORD said was going to start. T.THOMAS asked CRAWFORD to meet
27

1 him in front of Circle K and he agreed.

2 232. Based on the content of the intercepted call, I believe Walmart flagged the female
3 sending the money on behalf of POOH, and CRAWFORD and T.THOMAS were concerned about it.
4 I believe T.THOMAS suggested CRAWFORD use a “burner phone” (a phone not subscribed in the
5 user’s name) because they are harder for law enforcement to associate to a person.

6 233. On November 2, 2017, at approximately 1538 hours, agents intercepted an incoming
7 call on TT#1 to CRAWFORD from POOH’s Phone (Call#6330). During the call, CRAWFORD said
8 he was with "Double" (T.THOMAS) going to go get it at 5pm, because baby had to go to work.

9 234. I believe CRAWFORD told POOH that he was with T.THOMAS and they would take
10 ALLEN after she got off work, around 1700. I believe CRAWFORD was referring to the money
11 being sent via Walmart money gram.

12 235. On November 2, 2017, at approximately 1552 hours, agents intercepted an outgoing
13 call on TT#1 from CRAWFORD to T.THOMAS’s Phone (Call#6375). During the call,
14 CRAWFORD said he was at Walmart “with this bitch tryin' to get some bread.” CRAWFORD said
15 Walmart had ALLEN calling people in order to get the money. T.THOMAS asked if CRAWFORD
16 called POOH and CRAWFORD said no. CRAWFORD and T.THOMAS were nervous and
17 CRAWFORD said he would call when they figure it out.

18 236. Officer Sanchez later obtained a copy of the video surveillance of the Walmart Money
19 Center transaction counter terminal #2. The following is a summary of the video surveillance:

20 237. On November 11, 2017 at 1230 hours, Officer Sanchez spoke to Walmart Asset
21 Protection Associate Javonte Perkins from the Walmart Supercenter, located at 6225 Colony St.
22 Perkins assisted with reviewing video surveillance footage of the Walmart Money Services counter
23 on November 2, 2107. While reviewing the footage Officer Sanchez observed Bryshanique ALLEN
24 approach teller #2 and hand the associate her ID card. Having previously seen a DMV photograph of
25 ALLEN, Officer Sanchez positively identified her as the female receiving the \$2500 dollars. As
26 ALLEN was waiting for the transaction to be completed, Officer Sanchez observed CRAWFORD

1 emerge from the background and stand next to ALLEN. The associate completed the transaction and
2 handed ALLEN \$2500 dollars. ALLEN was also handed a transaction receipt, which she signed.
3 The receipt listed Walmart store #1574, reference-PIN 871293648 and the receiving person was listed
4 as Bryshauque Keontranee ALLEN for an amount of \$2500 dollars. Officer Sanchez contacted the
5 store manager, Priscilla Bias and she provided me with a copy of the signed receipt, signed by
6 ALLEN, and a transaction printout.

7 238. On November 2, 2017, at approximately 2226 hours, agents intercepted an incoming
8 call on TT#1 to CRAWFORD from POOH's Phone (Call#6497). During the call, POOH asked if
9 everything was gravy and CRAWFORD says everything went good. POOH told CRAWFORD next
10 time let him know everything was okay and CRAWFORD agreed. CRAWFORD told POOH that
11 "TAPP" would talk to him when he visited POOH.

12 239. Based on my knowledge of this investigation and the content of the previously
13 intercepted calls, I believe CRAWFORD advised POOH that he was successfully received the
14 Walmart money gram transfer. Also, I believe CRAWFORD was referring to Tommie THOMAS
15 when he said "TAPP" would be discussing the female when he visited POOH in North Dakota.

16 240. Based on my knowledge of this investigation, the content of the intercepted calls and
17 video surveillance obtained from the Walmart Supercenter, I believe CRAWFORD and T.THOMAS
18 assisted each other in coordinating the transfer of \$2500 dollars from POOH to Bryshanique ALLEN.
19 I believe CRAWFORD, T.THOMAS and POOH utilize the Walmart money gram system in order to
20 conceal the transfer of money. Based on my training and experience, I know that gang members will
21 often enlist the help of family members, friends and female associates, when they perform certain
22 criminal acts. I believe CRAWFORD, T.THOMAS and POOH are using various females to
23 complete money transfers in order to avoid being detected by law enforcement. The intercepted calls,
24 during which ALLEN was being coached by CRAWFORD and POOH to fabricate a story to avoid
25 having the money be held up by Walmart as a fraudulent transaction, establish ALLEN's knowledge
26 of the money being proceeds of an illegal activity between POOH, CRAWFORD and T.THOMAS.

1 Furthermore, I know CRAWFORD and T.THOMAS are involved in the sale and distribution of
2 narcotics out of the state of California and I believe the money being sent from POOH was for
3 payment of narcotics shipped to POOH in North Dakota by CRAWFORD and T.THOMAS.

4 241. Based on the above, I believe that CRAWFORD and T.THOMAS coordinated with
5 POOH to use the WalMart money transfer service to remit payment for drug purchase. CRAWFORD
6 and T.THOMAS utilized A.H. and ALLEN to collect the money during two separate transfers on
7 November 1, 2017 and November 2, 2017 respectively. I believe the evidence reveals that ALLEN
8 was aware the money was for some unlawful activity. Consequently, there is probable cause to arrest
9 ALLEN for violations of 18 U.S.C. § 1956(a)(1)(money laundering).

10 242. ALLEN has significant ties to the WSC. Notably, a black Volkswagon that law
11 enforcement repeatedly saw CRAWFORD driving during this investigation was registered to
12 Bryshanique Allen or Robresha Hall, 380 Pacheco Road, Apt 924, Bakersfield. Additionally, as
13 noted V(L) below, before E.D., WARREN, and E.C. traveled to MLK part to attempt to shoot rival
14 ESC members, they stopped briefly at ALLEN's Residence (701 T Street, Bakersfield, CA).
15 CRAWFORD also stopped at ALLEN's Residence when calls intercepted on 10/05/2017 indicated
16 that he was planning a separate shooting. Consequently, I believe that ALLEN stores firearms for the
17 WSC at ALLEN's Residence. This indicates that she is a trusted associate of the WSC. Given her
18 repeated involvement with the WSC, there is probable cause to believe that evidence of violations of
19 18 U.S.C. § 1956(a)(1) (money laundering) is stored at ALLEN's Residence.

20 **K. October 6, 2017 Conspiracy to Commit a Drive by Shooting at MLK Park (PC to**
21 **Arrest WARREN; PC to Search WARREN's Residence and WILLIS's Residence)**

22 243. On 10/06/17 at approximately 1928 hours during session 2013, CRAWFORD at TT#1
23 received an incoming call from WILLIS at TT#8.¹⁹ During the conversation, CRAWFORD said,
24 "What's up fool?" WILLIS said, "Damn cuz them niggas (ESCs) like 190 deep ass, California Park

25
26 ¹⁹There is probable cause to believe that WILLIS is using TT#8 because on 10/07/2017, physical
27 surveillance conducted a ruse telephone call to WILLIS at TT#8 during which surveillance both
28 observed WILLIS access his phone. Law enforcement also listened to his voice during the call.

1 right now. Ain't no law in the area, it's hella dark up there.” CRAWFORD said, “I'll take a look.”
2 WILLIS said, “I'm trying to short cut with a beerb (ph.) thing cuz, I'm trying to wet that mother
3 fucker right now. On Turq, I just passed by now, like what, them niggas (ESCs) are out there deep.”
4 CRAWFORD said, “I mean, let me see, let me see what the homies on, I ain't got no car right now.”
5 WILLIS said, “Yeah, ah, nigga, the whip ain't the problem, nigga, just ah, nigga trying, nigga trying
6 to tag that cuz. It's hella dark too cuz, back there by where Betsy Owens at nigga just got to walk up.
7 I'm trying to get the chopper cuz, so nigga get a yopper cuz hit me. I ain't going no pistol.”
8 CRAWFORD said, “Alright.” WILLIS said, “Alright on Turq.”

9 244. Based on my training, experience, and my knowledge of this investigation and others,
10 I believe that in the above call WILLIS was informing CRAWFORD that a group of ESCs were
11 located at Martin Luther King Park, which is on E. California Avenue, and that WILLIS was trying to
12 locate a rifle to shoot at the ESCs. When WILLIS stated “ain't no law”, I believe WILLIS was
13 informing CRAWFORD that there was no law enforcement in the area of the park which would allow
14 them to shoot at the individuals in the park without threat of being stopped/observed by law
15 enforcement. When CRAWFORD said “I ain't got no car right now”, I believe CRAWFORD was
16 advising WILLIS that he did not have a vehicle to travel to the park. When WILLIS said he was
17 trying to “get the chopper” because he “ain't going no pistol”, I believe WILLIS was advising
18 CRAWFORD that he was trying to locate a rifle because he did not want to use a pistol to shoot at the
19 ESCs at the park.

20 245. At approximately 1945 hours (Session 2015), CRAWFORD at TT#1 received an
21 incoming call from E.C. at TT#10. During the conversation, CRAWFORD said "Hello? [UI] Hello?
22 You in the whip (car)? Who's in the car [UI]" E.C. said, "Yep." CRAWFORD said, "Nigga, Come
23 get, nigga, go there, nigga all the [UI] at Martin Luther King Park chillin'. On the dead homies, I just
24 rolled by nigga." E.C. asked "Right now?" CRAWFORD asked, "Why Payso (D.W.) air up my house
25 and he in jail for it? Payso air out my house." E.C. said, "Say what?" CRAWFORD said, "Nigga, on
26 the dead homies, the police..." E.C. said, "Hell, no." CRAWFORD continued "... and showed me a
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1 picture of him in his car and all this shit. Cuddy did a drive by." E.C. said, "Cu air out..."
2 CRAWFORD said, "On God [UI]" E.C. said "[UI]. What the fuck. He hella boo-boo for that."
3 CRAWFORD said, "Eli (E.C.), I'm like... it gotta be somebody else, man, that's my friend. He like
4 well I heard you all was beefin' about what happened with his brother. I'm like, nah. Listen, go get
5 this... go get flap (gun). You need another one (another gun)?" E.C. said, "I already got it (gun)."
6 CRAWFORD said, "Come up, come to my house right now." E.C. said, "[UI]." CRAWFORD said,
7 "Hurry up, nigga, go turq up. Nigga, what's his name up there dissin' the hood right now." E.C. said,
8 "Alright." CRAWFORD said, "Van [ph., poss. Vin] and Brake [ph.] all over there on the snap
9 (Snapchat) dissin' the hood right now. [UI]." E.C. said, "I thought them niggas was in what's his name
10 [UI]." CRAWFORD said, "No, no, Van is. No Frank not." E.C. said, "[UI]" [UI] background
11 conversation. E.C. said, "Look, them niggas, them niggas, them niggas always on [UI] Snapchat, on
12 Van's [ph., poss. Vin] Snapchat." CRAWFORD said, "Yeah them niggas [UI] like 10 young niggas at
13 the park dissin' the hood." E.C. said, "Alright, I'm fittin'..." CRAWFORD said, "Listen, are you
14 close." E.C. continued, "pull up at yours right now." CRAWFORD said, "Hurry up, nigga..." E.C.
15 said, "[UI] P's." CRAWFORD said, "I got everything you niggas need. I just rolled through the egg.
16 Ain't no police, nigga, on God." E.C. said, "Alright." CRAWFORD said, "[UI] with the extra come
17 on. Alright hurry up." E.C. said, "Alright."

18 246. Based on my training, experience, and my knowledge of this investigation and others,
19 I believe that in the above call CRAWFORD was directing E.C. to travel to CRAWFORD's location
20 to meet up with CRAWFORD to conduct a shooting of ESC members located at Martin Luther King
21 Park. When CRAWFORD told E.C. "go get the flap" and E.C. responded "I already got it",
22 CRAWFORD was telling E.C. to pick up a gun and E.C. advised that he already had one. When
23 CRAWFORD stated "like 10 young niggas at the park dissin' the hood", CRAWFORD was advising
24 that ESCs at the park were disrespecting the WSC. When CRAWFORD said, "I got everything you
25 niggas need", I believe that CRAWFORD was stating he had everything E.C. and others (later
26 identified as E.C., E.D., and WARREN) would need to commit a shooting against the ESC members
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1 at the park.

2 247. At 1950 hours, agents set up surveillance at CRAWFORD's residence, located at
3 320 4th Street, Bakersfield. At 1953 hours TFO Anderson observed a white 2015 Nissan Versa CA
4 license number 7VVN106 (r/o Stephen Louise, or Steward Bernice, 2701 Morin Ct, Apt 2,
5 Bakersfield) park in front of the residence. TFO Anderson also observed CRAWFORD's black 2013
6 Volkswagon Passat Cal. Lic.# 7WYL290 (r/o Bryshanique Allen or Robresha Hall, 380 Pacheco
7 Road, Apt 924, Bakersfield) pull into the driveway for about 30 seconds then leave. Ofcr. Sanchez
8 followed the Passat to 701 T Street (residence of ALLEN), which is a house CRAWFORD has gone
9 to before when he was going to attempt a drive-by shooting on rival ESC gang members. Due to the
10 neighborhood in which this house is located and darkness, agents were not able to see anybody
11 enter or exit the vehicle or house.

12 248. At 2002 hours, Agent Silveira observed the white Versa leave CRAWFORD's house
13 and Ofcr. Sanchez saw it arrive at 701 T Street, where the Passat was located. At 2005 hours, Ofcr.
14 Sanchez saw both cars leave this location and Agent Silveira observed the white Versa park in front
15 of CRAWFORD's house, facing west, and the Passat parked across the street, on the south side of
16 4th street, facing east. SA Compston identified CRAWFORD get out of the driver's seat of the
17 Passat and walk across the 4th to his house. At 2007 hours Ofcr. Szatmari saw CRAWFORD
18 walking across 4th street towards his Passat. As CRAWFORD was walking, Ofcr. Szatmari saw
19 CRAWFORD put his gray hoody sweatshirt over his head and tying the strings around his neck. He
20 was not able to see what position CRAWFORD was in the Passat. At 2008 hours, Ofcr. Jeffries
21 observed the white Versa make a u-turn on 4th street and head eastbound with the Passat directly
22 behind the Versa. Ofcr. Szatmari observed there were two other subjects in the Passat with
23 CRAWFORD. Both vehicles were followed eastbound on 4th street, driving in the direction of
24 Martin Luther King Park.

25 249. At approximately 2009 hours (Session 2017), CRAWFORD at TT#1 placed an
26 outgoing call to E.C. at TT#10. During the conversation, CRAWFORD said, "Eh, who is this?" E.C.

1 said, "Eli (E.C.)." CRAWFORD said, "Let me speak to Erin (E.D.)." E.D. said, "Hello."
2 CRAWFORD said, "Eh..." E.D. said, "Yeah." CRAWFORD said, "After niggas do they do, go to
3 Cory house." E.D. said, "Alright." Based on my training, experience, and my knowledge of this
4 investigation and others, I believe that in the above call CRAWFORD advised E.D. that they (E.C.,
5 E.D., and WARREN) should meet at Cory's house after they commit the shooting at Martin Luther
6 King Park. I believe that CRAWFORD is referring to E.C., E.D, and WARREN because, as
7 discussed below, E.D. and WARREN were eventually arrested fleeing from the Versa, and E.C. was
8 spotted by law enforcement fleeing from the Versa and later intercepted on CRAWFORD's TT#1
9 discussing his escape.

10 250. At approximately 2009 hours (Session 2018), CRAWFORD at TT#1 received an
11 incoming call from WILLIS at TT#8. During the conversation, WILLIS said, "Where you all niggas
12 at?" CRAWFORD said, "At MLK [UI] where you niggas at?" WILLIS said, "Nigga at Calif...,
13 inside California park (Martin Luther King Park, which is on E. California Avenue) I just left."
14 CRAWFORD said, "The back part, the back, listen or the front." WILLIS said, "in the front."
15 CRAWFORD said, "Like so by the projects, right?" WILLIS said, "No, no, no, like if you're driving
16 up California right in the main part where the Dr. Martin Luther King sign is at." CRAWFORD said,
17 "Oh so niggas best bet park across the street by the gas station." WILLIS said, "Hold on, where you
18 all - look let me drive through there right now, cuz this car just left me, I ain't gonna say it was on me,
19 but that shit left me." CRAWFORD said, "You said what?" WILLIS said, "Drive back through there
20 cuz and make sure them niggas (ESCs) is still right, they was gang deep nigga when I called you."
21 CRAWFORD said, "You said what?" WILLIS said, "I'm right here on Washington. I'm right here on
22 Potomac and Washington." CRAWFORD said, "We on Potomac and King, we pulling up to the park
23 right now, we at the park." WILLIS said, "Alright, Potomac and King? Alright I'm coming right now.
24 Hey you hear me?"

25 251. Based on my training, experience, and my knowledge of this investigation and others,
26 I believe that in the above call CRAWFORD and WILLIS were both arriving at Martin Luther King
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1 Park and coordinating to conduct a shooting. When WILLIS stated “this car just left me, I ain’t
2 gonna say it was on me,” WILLIS was advising CRAWFORD that he identified a car that was
3 possibly following him. WILLIS was likely concerned that the car could have been a surveillance
4 vehicle for law enforcement. When WILLIS said “make sure them niggas is still right, they was gang
5 deep,” I believe WILLIS was advising CRAWFORD to confirm the ESC members were still at the
6 park.

7 252. At this time, Agent Silveira advised SEU Ofcr. Poteete to initiate a traffic stop on
8 the white Versa as they were attempting to commit murder on rival gang members. Ofcr. Poteete
9 advised he was too far away, however, Ofcr. Petris acknowledged via radio he observed the
10 Versa traveling northbound South King Street, and he was able to get behind the vehicle. Ofcr.
11 Petris and Ofcr. Nuriddin were a two-man unit in a marked patrol vehicle. They initiated a traffic
12 stop in the 900 block of South King Street on the Versa and the vehicle quickly accelerated. The
13 vehicle drove in the east entrance of the Central Cali Market and traveled westbound in front of the
14 store. The vehicle then turned southbound in the parking lot, toward the south alley, when Ofcr.
15 Petris observed three black male subjects exit the car while the car was moving and flee on foot. The
16 Versa ended up crashing into a telephone pole on the west side of the Market. Erin DEAN and
17 Bernard WARREN were taken into custody and E.C. evaded arrest. Officers located a Glock 17,
18 9mm semi-automatic handgun with a 30-round high capacity magazine, containing 25 live rounds
19 with one in the chamber in the waistband of E.D.. BPD Officer Romero and BPD Officer Orozco
20 arrived to the scene of the vehicle stop to assist other officers. Upon arrival Officer Romero located
21 a Glock 19, 9mm semi-automatic handgun with a loaded 17-round high capacity magazine located
22 on the front passenger side floorboard. Officer Romero took digital photographs of the firearm.
23 Officer Barthelmes subsequently cleared the firearm and conducted a functions test and confirmed it
24 was operable. Officer Barthelmes was wearing nitrile gloves during this process. On November 12,
25 2017, your Affiant spoke with BPD Officer Romero who located the firearm to inquire if the firearm
26 had a round in the chamber when located. Officer Romero reviewed photographs taken of the firearm

1 when it was located. Officer Romero spoke with Officer Barthelmes also confirmed the Glock 19
2 had a round in the chamber. BPD Officer Montgomery also located a Taurus 9mm semi-automatic
3 handgun, fully loaded 10-round magazine including one in the chamber. Officer Montgomery began
4 a search for any outstanding suspects upon arriving to the scene of the vehicle stop. Officer
5 Montgomery was advised by Officer Petris that he observed a subject (later identified as E.C.)
6 running westbound from the intersection of South King Street and East 11th Street. As Officer
7 Montgomery began to walk the area he located the aforementioned Taurus firearm.

8 253. WARREN was transported and booked into the Kern County Sheriff Jail on various
9 street gang and gun charges. WARREN did not provide any statements subsequent to his arrest.

10 254. E.D. was transported and booked into the Kern County Juvenile Center on various
11 street gang and gun charges. Prior to being transported to Kern County Juvenile Center, E.D. was
12 taken from the scene of his arrest to Kern Medical Center (KMC) to be treated for an injury sustained
13 while resisting officers. Upon arrival to KMC, Officer Bishop made phone contact with E.D.'s
14 mother, Shewanda Ruffus. E.D. was subsequently read his Miranda Rights and stated he understood.
15 DEAN said he wanted his parents to be present before he would talk about the incident, however later
16 made a spontaneous statement. E.D. said, "Sir, I found that gun. I was trying to get it out to hand it
17 to you." E.D. was asked about his affiliation, to which E.D. stated he grew up on the West Side and
18 was not going to deny that he was "from there".

19 255. At approximately 2012 hours (Session 2019), CRAWFORD at TT#1 received an
20 incoming call from WILLIS at TT#8. During the conversation, CRAWFORD said, "Nigga the
21 homies (E.C., E.D., and WARREN) just bounced out on the road nigga with the flap (gun)." WILLIS
22 said, "they running (running from law enforcement)?" CRAWFORD said, "Hell yeah it's like, nigga,
23 rollies (law enforcement) they came out of the cut nigga and got on niggas." WILLIS said, "Fuck
24 cuz, who, niggas ain't got they phones. I'm out over here in the area I could scoop them niggas."
25 CRAWFORD said, "Drive by the park nigga." WILLIS said, "Alright look."

26 256. Based on my training, experience, and my knowledge of this investigation and others,
27
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1 I believe that in the above call CRAWFORD advised WILLIS that the police stopped the vehicle
2 E.C., E.D., and WARREN were in and they ran from the vehicle. When WILLIS stated “I could
3 scoop them niggas,” I believe WILLIS advised that he could pick up E.C., E.D., or WARREN.

4 257. At approximately 2022 hours (Session 2020), CRAWFORD at TT#1 received an
5 incoming call from WILLIS at TT#8. During the conversation, WILLIS said, “How many of them
6 waz y'all.” CRAWFORD said, “Three. It's three the homies, dog. It's me and y'all [UI] three of them
7 niggas.” WILLIS said, “Yeah, they (law enforcement) got, they got, they got two cuz, it looked like,
8 ah Tiny, another nigga, the other homie cuz looks like he got some size on him and shit, kind of tall, I
9 don't know who it is I can't see.” CRAWFORD said, “That's Baby Dub (E.D.)” WILLIS said, “Nah,
10 Baby Dub (E.D.) skinny.” CRAWFORD said, “Ah, they didn't get Baby Dub (E.D.)?” WILLIS said,
11 “Nah, I, I, I just drove by.” CRAWFORD said, “The dark, the dark one with Winoka's (ph.) son?”
12 WILLIS said, “Oh yeah, Leebay (WARREN).” CRAWFORD said, “That's who, yeah, they got
13 him?” WILLIS said, “Ah yeah, I think, I think that probably is who that was, I think cuz lying on the
14 side right across the street from, ah Bernard's (WARREN's) phone (ph.), they got him (law
15 enforcement arrested WARREN). Then right up the street on the same side they put another nigga in
16 a car, and they still looking for somebody. So, two niggas is got for sho'. And they looking for
17 somebody. 'Cause I'm still, I'm still out here looking at the police. I'm nigga, I'm...” CRAWFORD
18 said, “You going to get arrested too nigga, [UI] dirty.” WILLIS said, “Who?” CRAWFORD said,
19 “You.” WILLIS said, “Nigga on turq, I dropped flap (gun) and my blow (cocaine) off, nigga, what,
20 nigga hell no. I'm trying to get, they looking for somebody. Right here where Vista E, Vista East used
21 to be at, I don't know right here on Eureka. That's where I'm, [UI] shit. Somebody got away,
22 somebody running, there's a ghetto bird (law enforcement helicopter) looking for him and so is the
23 cops. And I'm right next to the cops, they just went around me, nigga fuck y'all nigga.”

24 CRAWFORD said, “I'm right, I'm right here by Central Cali.” WILLIS said, “You at Central Cali?”

25 CRAWFORD said, “Yeah, the store.” WILLIS said, “What the fuck, nigga you better get up out of
26 there.” CRAWFORD said, “I, I took flap (gun) though.” WILLIS said, “Ah, okay, okay, yeah, you

1 goofy. You got you're [UI] too nigga.” CRAWFORD said, “I got no [UI] gun but nigga, I'm trying to
2 look for nigga, whoever, nigga [UI] nigga.” WILLIS said, “These niggas right, I'm at, I'm right here
3 at Central Cali staring at a fire truck. I'm right here, cuz. Somebody got, yeah, see they, ah they
4 looking, they tossed a gun, they looking for something right here, you cross from Central Cali, three
5 police looking for something.” CRAWFORD said, “Yeah, I'm right here too.” WILLIS said, “Fuck
6 cuz. So, who you, who you, you got Young with you?” CRAWFORD said, “Yeah, he in lot of trouble
7 [UI]” WILLIS said, “Yeah, you got squa (ph) cuz. Was it Tiny, oh it was Dub, Winonko and who
8 was the other nigga?” CRAWFORD said, “[UI] Erin (E.D.)” WILLIS said, “No, no, I know Baby
9 Dub (E.D.), Winonko son (WARREN) and who? I'm right her cuz, I don't give a fuck, nigga. Yeah,
10 they got two niggas right here.”

11 258. Based on my training, experience, and my knowledge of this investigation and others,
12 I believe that in the above call CRAWFORD and WILLIS were trying to determine which WSC
13 members had been arrested. When WILLIS stated “I dropped flap (gun) and my blow (cocaine) off”
14 and CRAWFORD stated “I took flap (gun)”, I believe WILLIS and CRAWFORD advised that they
15 dropped their guns off prior to returning to Martin Luther King park to determine what was
16 happening. I believe they dropped their guns off so that they would not be in possession of a weapon
17 if they were contacted by law enforcement. When CRAWFORD advised “I'm trying to look for
18 nigga”, I believe CRAWFORD was telling WILLIS that CRAWFORD was trying to locate the WSC
19 member who was still running from law enforcement. Based on the call below, I believe that
20 individual on the run was E.C..

21 259. At approximately 2025 hours (Session 2021), CRAWFORD at TT#1 received an
22 incoming call from E.C. at TT#10. During the conversation, E.C. said, “Hello. Yeah. Where you at?”
23 CRAWFORD said, “Well who is this?” E.C. said, “Where you at?” E.C. said, “Bro, I'm in the hood
24 (WSC territory) right now, bro.” CRAWFORD said, “Hello?” E.C. said, “Yeah, I'm in the hood, bro.”
25 CRAWFORD said, “You in the hood?” E.C. said, “Yeah, come get me.” CRAWFORD said,
26 “Alright on dub (on the Westside), where you at?” E.C. said, “I'm right here on Pershing (Pershing
27
28

1 Street, which falls within traditional Westside Crip territory)?” CRAWFORD said, “Where you at,
2 nigga!” E.C. said, “On Pershing.” CRAWFORD said, “I’m on my way.”

3 260. Based on my training, experience, and my knowledge of this investigation and others,
4 I believe that in the above call E.C. was on the run from law enforcement and called CRAWFORD to
5 pick him up. I believe E.C. escaped the perimeter of the SEU Officers. When E.C. advised, “I’m in
6 the hood,” and stated he was on “Pershing”, I believe E.C. advised that he was within traditional
7 WSC territory.

8 261. At approximately 2034 hours (Session 2022), CRAWFORD at TT#1 placed an
9 outgoing call to who at the time, Agents thought was Clarence WANDICK at TT#9. Agents later
10 determined TT#9 was being used by Paul DEAN.²⁰ As such the user will of TT#9 will be referred to
11 herein as “P. DEAN”. During the conversation, CRAWFORD said, “Hey the law got Erin (E.D.).”
12 P. DEAN said, “Yeah.” CRAWFORD said, “Right there at MLK park.” P. DEAN said, “At Martin
13 Luther King park?” CRAWFORD said, “Yeah it's like 50 cops.” P. DEAN said, “Him and who?”
14 CRAWFORD said, “Him (E.D.) and Bernard (WARREN). The other nigga Eli (E.C.)... Eli got
15 away.” P. DEAN said, “Oh he did?” CRAWFORD said, “Yeah I just picked him up and dropped him
16 off.” P. DEAN said, “They try, they find flaps (guns) and shit?” CRAWFORD said, “I’m not sure
17 yet, Eli, this nigga Eli did some dumb ass shit, threw the flap (gun) in the alley and kept the lid, I’m a,
18 but they found that one. I'm watching them (law enforcement) in the alley, they in the alley.” P.
19 DEAN said, “They found the strap (gun)?” CRAWFORD said, “Yeah.” P. DEAN said, “Oh yeah,
20 they in trouble then.” CRAWFORD said, “But shit, I'm trying, I'm trying to see what this look like,
21 they got, they got cuz on the ground an ambulance, I mean a fire department talkin to the nigga like,
22 like they scraped niggas like.” P. DEAN said, “Who Erin or Bernard, Erin?” CRAWFORD said,

23
24 ²⁰ On 11/02/2017 surveillance agents and officers utilized GPS phone pings to locate the silver Buick
25 sedan at 8732 High Ridge Drive. Units subsequently coordinated with BPD Officers to conduct a
26 vehicle stop of the silver Buick, during which BPD identified the driver as DEAN. Additionally on
27 11/02/2017 during call number 867 over TT#9, UM443 at telephone number 661-379-9196 sent a
28 text message which read, “What’s good wit you P-Dub This Is Leon Jus Checking to See a Good
Time To Get At You.” I know based on my experience investigating WSC members and
conversations with BPD gang Officers, I know “P-DUB” is the gang moniker of Paul DEAN.

1 “Erin.” An unidentified male (UM) in the background said, “I think cuz got hit by a car bro.”
2 CRAWFORD said, “You say he got hit by a car?” UM in background said, “Like he got clipped like
3 uh, cuz ran across the street right in front of us, he made it further [UI] right there and they got the
4 fire, ambulance, everything like right there with cuz.” P. DEAN said, “God dammit, alright man keep
5 me posted man.” CRAWFORD said, “I’m riding back by right now different car.” P. DEAN said,
6 “Alright hit me back.”

7 262. Based on my training, experience, knowledge of this investigation and others, I believe
8 that P. DEAN is a leader and OG (“original gangster”) within the WSC. I also know P. DEAN to be
9 the father of E.D.. Consequently, in the above call, I believe that CRAWFORD called P. DEAN to
10 report law enforcement’s action and the arrest of WSC members to P. DEAN. In this manner, I
11 believe that CRAWFORD was reporting the actions of lower WSC members to an older member
12 within the gang, as well as the father of one of the arrestees (E.D.). As an experienced gang member
13 within the gang, I believe P. DEAN asked if “they found the strap (gun)”, because he knew that if law
14 enforcement located the gun E.D. and WARREN would be “in trouble” referring to being arrested
15 and charged.

16 263. At approximately 2127 (Session 2026), CRAWFORD at TT#1 received an incoming
17 call from P. DEAN at TT#9. During the conversation, P. DEAN said, “Hey what happened, they take
18 them?” CRAWFORD said, “Yeah they (law enforcement) took 'em, but they (law enforcement) still
19 looking they in the alley behind Cali still looking for stuff.” P. DEAN said, “Have they found one
20 (found a gun) already?” CRAWFORD said, “Yeah they found one of them already. This nigga Eli
21 (E.C.), he threw the other one (gun).” P. DEAN said, “How many (many guns) was in the car, how
22 many they had on'em?” CRAWFORD said, “Two or three, three, three.” P. DEAN said, “Oh. Why
23 the niggas was going?” CRAWFORD said, “Shit, nigga, I'm not, see they, where'd you see they
24 found them at.” P. DEAN said, “Hmmm, alright.”

25 264. Based on my training, experience, and my knowledge of this investigation and others,
26 I believe P. DEAN was calling for an update from CRAWFORD on the status of law enforcement’s

1 action. I believe CRAWFORD advised P. DEAN that there were three guns in the vehicle and that
2 law enforcement found one and were still searching for others. When CRAWFORD said “This nigga
3 Eli (E.C.), he threw the other one (gun),” I believe he was referring to the aforementioned Taurus
4 9mm semi-automatic handgun that law enforcement found in the dirt lot on 11th Street. Based on
5 additional review of the call detailed above, I also believe CRAWFORD was confirming to P. DEAN
6 that E.D., WARREN, and E.C. were the three in the car and they each had a firearm.

7 265. As noted above, E.D. was found with the aforementioned Glock 17, 9mm semi-
8 automatic handgun with a 30-round high capacity magazine in his waistband, and intercepted calls
9 above and below indicate that E.C. possessed and discarded the Taurus 9mm semi-automatic
10 handgun. Calls above and below also indicate that all three individuals in the vehicle were going to
11 participate in the shooting, and that three guns were going to be used. Consequently, I believe that
12 WARREN possessed the third firearm – the Glock 19, 9mm semi-automatic handgun with a loaded
13 17-round high capacity magazine found on the front passenger side floor of the aforementioned
14 Nissan located at the vehicle stop by BPD. I believe that WARREN left the firearm in the vehicle
15 before he fled so that he would not be discovered in possession of it were he unable to evade police.

16 266. At approximately 0920 (Session 2151), CRAWFORD at TT#1 received an incoming
17 call from E.C. at TT#10. CRAWFORD said, “Hello?” E.C. said, “Yeah.” CRAWFORD said, “Who
18 is this?” E.C. said, “Eli.” CRAWFORD said, “Hey, where'd you, where'd you throw the flap at?”
19 E.C. said, “Okay, so listen, you know how it's like a field?” CRAWFORD said, “Yeah and when
20 you hop the gate, there's a tent, there's a tent over there, okay I'm looking at the tent.” E.C. said,
21 “It's right, like right, right there like right on the side of that tent.” CRAWFORD said, “Just on the
22 ground outside of the tent.” E.C. said, “It should be right there outside of the tent, or like right by, or
23 on the tint or something, it should be right there.” CRAWFORD said, “I'm at the tent right, the tent
24 on the other side of the field, like when you run through the field at the other end, right?” E.C. said,
25 “Yeah, like at that corner, and like, it's tha, the, the gate, I hopped, that's where I hopped that, that's
26 where, I threw flap right there.” CRAWFORD said, “Alright make a left. Pull over on the left side
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1 of the street. You threw it, you didn't throw it on top or on the bottom?" E.C. said, "I threw it like
2 right, like right inside the gate and the tent, it's" CRAWFORD said, "The corner at the gate and tent."
3 E.C. said, " Yeah, it's through the, like, it's not, it's exactly like, when I see the tent like they didn't
4 even see me, like they were still in the car, like while they were still in the car they barely bounced
5 out once I hit the fence, that's when they barely bounced out. And that's where I already threw flap.
6 When I hit the corner, and that's when I hopped the fence." CRAWFORD said, "I'm looking bro. I'm
7 looking on the ground, bro." E.C. said, "Do it, it be right there by the tent." CRAWFORD said, "Hey.

8 267. E.C. said, "Yeah." CRAWFORD said, "Hey, who else in here? Unidentified Male:
9 Just you [UI]. CRAWFORD said, "Hey, I got [UI] I think I can help you. I'm AJ. Unidentified
10 Female (UF): [UI]" CRAWFORD said, "I dropped something [UI] UF: [UI]" CRAWFORD said,
11 "What, what'd they find? Who is that? Can you, can somebody come out and help me? I got a couple
12 hundred, know what I'm saying? I got two." UF: [UI] CRAWFORD said, "Where'd they find it at?"
13 UF: [UI] they kept searching the lot, this lot, that's all I know. That's exactly where they find it. [UI]
14 CRAWFORD said, "Fuck, 'cause I got five hundred." UF: [UI] CRAWFORD said, "Oh well cuz, if
15 y'all find one over there I got five hundred." E.C. said, "What did they say?" CRAWFORD said,
16 "This bitch."

17 268. Based on the above intercepted call between CRAWFORD and E.C., I believe E.C. is
18 giving CRAWFORD directions of where he threw the gun the previous night when he got into a
19 pursuit with E.D. and WARREN by the Martin Luther King Park. Based on his directions, and Ofcr.
20 Montgomery's supplemental report indicating he located a Taurus 9mm semi-automatic handgun
21 fully loaded with ten live rounds at the same location E.C. was describing, I believe E.C. discarded
22 this gun the previous night. CRAWFORD was speaking with subjects in the encampment and was
23 willing to pay them up to \$500 for the gun if they had it or if they find it.

24 269. On October 11, 2017, agents intercepted an incoming call (#2944) to CRAWFORD at
25 TT#1 from Michael Wayne CULP aka "Brownie," DOB: 5/11/76. Agents were able to identify
26 CULP using this telephone based on the information gathered during the call, his alias "Brownie,"
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1 and that he was sentenced to the California Department of Corrections Rehabilitation but was
2 transferred to Tallahatchie County Correctional Facility, Tutwiler, Mississippi, which is a contract
3 prison for California prison inmates. I have learned through BPD officers that CULP is a documented
4 WSC gang member from Bakersfield. This call was one hour and thirty-six minutes long. The
5 contents of this call consisted of CULP giving CRAWFORD advice on the criminal street gang life
6 within the WSC criminal street gang. It also consisted of both of CRAWFORD and CULP admitting
7 to committing crimes.

8 270. At approximately the 30-minute mark, CRAWFORD describes to CULP the actions
9 he took on October 6, 2017, and the people involved in the conspiracy to commit murder on the rival
10 ESC gang members at the MLK park. CRAWFORD says "T-Rag" and "McNasty" give him a flap.
11 CRAWFORD then gave "one of his" (GUN) to "P Dub's son, my young nigga" (E.D.). CRAWFORD
12 said he already has his own shit, two of 'em. CRAWFORD talks about the funeral that was over for
13 "Ed Dog" (ESC). CRAWFORD calls his "young niggas" and was on the way to check it out, and as
14 he was out there "two cars thick", the "law blurred the young nigga" as soon as they were at "The
15 Park" (MLK Park). CRAWFORD says he has "one thing" (gun) in his vehicle and the other car had
16 "like 3" (guns). CRAWFORD said, someone named "Chocolate Drop / Drop" (WILLIS) told
17 CRAWFORD that there would be no police. CRAWFORD says "Drop" is "Gucci Mar's brother" and
18 he is fat and hella dark. CULP and CRAWFORD talk about the police getting 3 flaps from 2 homies
19 and he was able to pick up the third that got away from the car, but that he threw his "flap". CULP
20 told CRAWFORD that is what he is supposed to do. CRAWFORD says they are juvenile. CULP tells
21 CRAWFORD to go with his heart and that "them niggas don't ride so they ain't got no say so." Based
22 on the intercepted call between CRAWFORD and CULP, I believe CRAWFORD is verifying and
23 claiming the incident that occurred on October 6, 2017.

24 271. On 11/13/2017 Alcohol, Tobacco, Firearms and Explosives Special Agent Brad
25 Dickey who has specialized training in the manufacture, origin, and identification of firearms
26 examined a photograph of the Glock 19, 9mm semi-automatic pistol possessed by WARREN. SA
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1 Dickey stated that the make, model Glock 19, 9mm semi-automatic pistol possessed by WARREN,
2 with serial number REZ999, was not manufactured in the state of California, and therefore, traveled
3 in and affected interstate commerce.

4 272. I have received and reviewed WARREN's certified conviction documents. Those
5 documents indicate that December 12, 2016, WARREN pled guilty to one count of Burglary: First
6 Degree, in violation of 460(A), in Kern County, CA, a felony crime punishable by a term of
7 imprisonment exceeding one year. WARREN was sentenced to a term of imprisonment of eight
8 months, a deal he received for pleading no contest. He was, nevertheless, convicted of first degree
9 burglary, a felony. Consequently, at the time of his possession for the aforementioned firearm and
10 ammunition, WARREN was a convicted felon and consequently prohibited from possession firearms
11 pursuant to 18 U.S.C. § 922(g)(1).

12 273. I believe that the evidence set forth above, as well as WARREN's criminal history and
13 documented WSC status, provides probable cause to arrest WARREN for a violation of 18 U.S.C. §
14 922(g)(1) – felon in possession of a firearm and ammunition.

15 274. I believe that the evidence set forth above, as well as WILLIS's criminal history and
16 documented WSC status, provides probable cause to search WILLIS's residence, 4032 O Street #22,
17 Bakersfield, CA, for evidence of WARREN's illegal possession of the Glock 19, 9mm semi-
18 automatic handgun with a loaded 17-round high capacity magazine; specifically, communications in
19 digital form (e.g., on a cell phone or social media website) regarding WARREN's activities that
20 evening. I also believe that this evidence provides probable cause to search WILLIS's residence for
21 evidence of his own illegal possession of a firearm in violation of section 922(g)(1). Notably, he is a
22 felon and he stated in the above-referenced calls that he possessed a gun on the evening in question.
23 Finally, there is also probable cause to search WILLIS's residence for violations of 18 U.S.C. § 1959
24 (Violent Crime in Aid of Racketeering) and 18 U.S.C. § 1962(c)(d) (Racketeer Influenced and
25 Corrupt Organizations) including indicia of WILLIS's membership and participation in the WSC, as
26 well as evidence of his agreement to violate section 1962(c), his own participation in violent crimes
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1 on behalf of the WSC, and his participation in the conduct of the WSC's affairs through a pattern of
2 racketeering activity.

3 275. Based on facts set forth above, I believe that in addition to the money laundering
4 mentioned in the preceding section, there is also probable cause to search ALLEN's residence (701 T
5 Street, Bakersfield, CA) for violations of 18 U.S.C. § 1959 (Violent Crime in Aid of Racketeering)
6 and 18 U.S.C. § 1962(c),(d) (Racketeer Influenced and Corrupt Organizations) including indicia of
7 ALLEN's and others' membership and participation in the WSC, as well as evidence of her and
8 others' agreement to violate section 1962(c) in violation of section 1962(d), others' participation in
9 violent crimes on behalf of the WSC in violation of section 1959, and her and others' participation in
10 the conduct of the WSC's affairs through a pattern of racketeering activity in violation of section
11 1962(c). As noted above, this is the residence of ALLEN. During the conspiracy, and prior to the
12 subjects traveling to MLK park, CRAWFORD, and other subjects referenced above, met at 701 T
13 Street. Evidence indicates that ALLEN continues to associate with WSC members even after
14 CRAWFORD's death. As noted above, on multiple occasions, CRAWFORD had involved ALLEN
15 and her residence 701 T Street, Bakersfield, CA during the movement of firearms and as noted above
16 during the sale of controlled substances. Based on the context of communications between
17 CRAWFORD and ALLEN, I believe they were in a relationship of some form. I believe based on
18 my review of numerous intercepted communications between CRAWFORD and females, that
19 CRAWFORD had simultaneous relationships with different females. I know based on my experience
20 investigating gangs as well as my knowledge of the interceptions during this investigation, that gang
21 members often have several females they are intimately involved with. I know that gang members
22 will often use these females, their vehicles, and their residences to support their own illegal activities.
23 I also know based on my experience with this gang investigation and others that gang associated
24 females may often have relations with several gang members at the same time.

25 276. On November 11, 2017, several communications were intercepted suggesting that
26 various WSC members had committed a home burglary at 2400 Emerson Street in Bakersfield.

1 Based on my review of the intercepted communications, I believe ALLEN provided these WSC
2 members a ride to the Mercado Latino. I know based on my experience working in Kern County, that
3 criminals take stolen property to the Mercado Latino to sell to shop keepers after burglaries. Physical
4 surveillance subsequently observed ALLEN at Mercado Latino with these WSC members located at a
5 jewelry counter. Surveillance later observed ALLEN and the aforementioned male subjects enter
6 ALLEN's known Volkswagen and depart the parking lot. BPD subsequently conducted a vehicle
7 stop . WSC member C.S. was subsequently arrested for his involvement in the home burglary.

8 277. Additionally, ALLEN has numerous communications with documented WSC J.W.
9 For example on November 17, 2017, J.W. made an outgoing call to ALLEN at telephone number
10 661-221-2940. During the conversation, ALLEN told J.W. she was at the Firehouse restaurant and
11 bar. J.W. told ALLEN he wanted her to come pick him up from the "P's"(720 Terrace Way). I know
12 that on November 17, 2017, four firearms were seized from the "P's". I also know that several
13 intercepted calls suggested that multiple WSC members later went to the Firehouse. I believe that
14 although CRAWFORD has died, ALLEN's role as an associate of the gang continues to exist.

15 **L. November 7, 2017, WILLIS and PIERSON's firearms recovered during Traffic Stop**
16 ***(Probable Cause to Arrest G.PIERSON and WILLIS and to Search Their Residences)***

17 278. On November 7, 2017, surveillance was conducted at 3030 Verde Street Apartment
18 #19, Bakersfield CA, the address of Kristi PIERSON²¹, a WSC associate and sister of Gary
19 PIERSON (aka Mad), a known WSC criminal street gang member. The purpose of the surveillance
20 was to observe a meeting between PIERSON and known WSC criminal street gang member, Danny
21 WILLIS (aka Chocolate Drop) for the purpose of moving firearms from the apartment to another
22 location in an effort to evade law enforcement detection and discovery for the benefit of the WSC
23 criminal street gang. Based on observations during the surveillance, set forth more fully below,
24 agents arranged for BPD patrol units to conduct and enforcement stop on a red 2017 Nissan Rogue

25 _____
26 ²¹ As noted previously in this affidavit, agents identified this address as K. PIERSON's and
27 T.THOMAS's residence.

1 SUV occupied by known WSC criminal street gang member M.H. As BPD units attempted to stop
2 the vehicle, M.H. accelerated the vehicle away in an attempt to evade the stop. M.H. later stopped the
3 vehicle and fled on foot. M.H. was later located in the area and arrested. During a search of the
4 vehicle, BPD officers located a loaded SKS style rifle with high-capacity magazine and a loaded AA
5 Arms 9mm pistol with a high-capacity magazine.

6 279. On November 7, 2017, at 1602 hours, Agents intercepted a conversation over TT8,
7 used by WILLIS. The conversation was between WILLIS and G. PIERSON, who was using (661)
8 599-9741. During the conversation, G.PIERSON asked "What's up cuz?" WILLIS replied, "Shit
9 nigga...you seeing what they just posted?" The intercepted call had a bad connection and was
10 disconnected. Based on the context of the communication and your Affiant's knowledge of the
11 investigation your Affiant was aware WILLIS was referring to a press release posted by BPD in
12 reference to a prior shooting suspected of involving WILLIS.

13 280. At 1603 hours, Agents intercepted another call over TT8, used by WILLIS, to
14 G.PIERSON, using (661) 599-9741, call #3123. During the call, the following conversation took
15 place:

16 WILLIS: Yeah who you with?

17 PIERSON: The (UI) homies pulled off?

18 WILLIS: Ah so you see, you see that shit they just posted?

19 PIERSON: What?

20 WILLIS: Nigga, nigga on the news nigga.

21 PIERSON: (Unintelligible)

22 WILLIS: Cuz, nigga you need to turn on the news nigga. Nigga. (Unintelligible)

23 PIERSON: What?

24 WILLIS: Look at it, look at it nigga. Nigga....to understand me nigga. You get what I'm
25 saying?

26 PIERSON: Huh?

1 WILLIS: I'm not talking about nothing, I'm just saying from the...nigga. You know the shit
2 that happened nigga. When they jacked up KEEWAY.

3 PIERSON: Yeah.

4 WILLIS: Nigga. Nigga, nigga, I'm gonna pull up on you. Well look. I'm gonna send
5 something to your phone right quick.

6 PIERSON: Alright.

7 281. Following this call, agents believed WILLIS was going to meet with G.PIERSON.
8 Agents learned from GPS phone pings on WILLIS's phone that WILLIS was likely located at
9 Pershing Ave and 8th Street. Surveillance Agents responded to this location to begin surveillance of
10 WILLIS.

11 282. At 1620 hours, Agents intercepted a call over TT8, used by WILLIS. The call was
12 from G.PIERSON, using (661) 599-9741. During the call the following conversation occurred:

13 WILLIS: What's the drill?

14 PIERSON: Where you at?

15 WILLIS: Right here at BK's shit.

16 PIERSON: It's ugly cuz.

17 WILLIS: Look man, uh.

18 PIERSON: Hey but I need you all to come grab this shit outta here cause I can't hold this shit
19 right now. Figure out where you all want it at.

20 WILLIS: Alright uh..

21 PIERSON: The broomstick and the AP.

22 (UM in background said "What about the nickel.")

23 WILLIS: What happened to the 45?

24 PIERSON: I keep it down on my hip nigga.

25 WILLIS: Haha

26 PIERSON: I ain't going out.

1 (UM said “Tell him to just take a vacation man.”)

2 PIERSON: I am but I gotta, I was waiting on Little to come back with some, the cash.

3 WILLIS: Ah, yeah well look.

4 PIERSON: We going up top cuz, tell BK it’s the same plan with the, either way I just want,
5 just in case. I mean, get everything up out of here.

6 WILLIS: Well look, the fucking, I can, I can.

7 PIERSON: Ya'll figure out where to put it somewhere close.

8 WILLIS: Yeah, put it right here, I can put it right here.

9 PIERSON: Hey call Jones, Jones said we can do it in his car cause he was telling Keeway
10 (WHATLEY) to put his thang in the, something about a black car, niggas can lock it in there.

11 WILLIS: You talking to BK or me?

12 PIERSON: BK.

13 WILLIS: Look, alright hey we gonna, alright yeah yeah I know what you talking about but no,
14 I got another spot for it.

15 PIERSON: Well ya'll come right now cuz. Cause Kristi tripping her (UI) she panicking. I ain't
16 got time for this shit.

17 WILLIS: I know.

18 283. Based on the context of the communication and your Affiant’s knowledge of this
19 investigation, your Affiant believes WILLIS and G. PIERSON are speaking about moving two
20 firearms, a broomstick and an AP (model AP9 9mm Luger), from “Kristi’s” residence. Based on
21 your Affiant’s knowledge of this investigation, your Affiant believes Kristi is Kristi PIERSON, who’s
22 residence is located at 3030 Verde #19. Additionally, your Affiant has learned through this
23 investigation that a “broomstick” is a common street term used to describe a rifle type firearm, and a
24 “nickel” to be a reference to a .45 caliber semi-automatic pistol. During the conversation, WILLIS
25 and G. PIERSON spoke about possibly placing the firearms in another gang member’s vehicle for
26 storage, but WILLIS said he had a place to store the firearms.

1 284. Furthermore based on the statements made by G. PIERSON, I believe G. PIERSON
2 was in possession of the two firearms and based on his statements, he no longer wanted them stored
3 at K. PIERSON's apartment. Additionally during the conversation, G. PIERSON described the
4 firearms specifically, further confirming his possession of them.

5 285. At the same time as the above call, SA Pacheco located WILLIS at an apartment
6 complex at 8th Street and Pershing Ave. WILLIS was observed seated in his light-colored Buick
7 sedan bearing California license plate ZIK502. The vehicle was located in the parking lot. SA
8 Pacheco observed WILLIS speaking on his phone, consistent with the time of the call, confirming
9 WILLIS was the user of TT8.

10 286. Between 1625 hours and 1635 hours, Agents observed WILLIS depart the parking lot
11 in the vehicle. The vehicle appeared to be followed by what appeared to be an unlicensed burgundy
12 Mazda sedan displaying paper plate. Surveillance observed WILLIS drive to the apartments located at
13 3030 Verde Street area, where K.PIERSON resides. (Agents were conducting surveillance at the
14 Verde Apartments with the use of a pole camera because physical surveillance is both too dangerous
15 and the risk of exposing surveillance officers and vehicles is high.) While driving, WILLIS made
16 several unnecessary turns and lane changes. Surveillance Agents believed WILLIS was conducting
17 counter surveillance, or attempting to identify if he was being followed by law enforcement. During
18 the surveillance, Agents lost sight of the Mazda.

19 287. At 1630 hours, Agents intercepted a call to WILLIS, using TT8, from known WSC
20 criminal street gang member R.G.²², using (661) 772-3561. During the call the following
21 conversation occurred:

22 R.G.: Hey.

23 WILLIS: Yeah?

24 R.G.: You see that white car?

25
26 ²² As detailed in BPD report number 17-206486, R.G. provided 661-772-3561 to officers.
27 Additionally during an intercepted call between 661-772-3561 and TT#16 (J.W.), user was identified
28 as R.G.'s first name.

1 WILLIS: What white car?

2 R.G.: Nigga behind us.

3 WILLIS: Yeah, that Chevy?

4 R.G.: Yeah.

5 WILLIS: Yeah, what about it?

6 R.G.: That motherfucker look like 12²³, nigga....that motherfucker been behind us since
7 Union. I'm gonna try to off him for a second....Hello?

8 WILLIS: They follow me (UI).

9 288. Based on the context of the conversation and your Affiant's knowledge of the
10 investigation, your Affiant believes R.G. was advising WILLIS that he thought law enforcement was
11 following them.

12 289. At 1637 hours, surveillance Agents observed WILLIS drive to a mini mall area at the
13 area of Brundage Ave and Myrtle Ave. WILLIS parked in a marked parking stall and appeared to
14 manipulate his phone.

15 290. At 1639 hours, Agents monitoring the pole camera at the Verde Apartments observed
16 the burgundy Mazda arrive at the Verde Apartment. Based on the Mazda arriving, surveillance
17 believed this to mean that WILLIS would arrive as well.

18 291. At 1651 hours, Agents intercepted a text message from WILLIS, using TT8, to
19 G.PIERSON, using (661) 599-9741, that read, "Stereo shop on Brundage. White envoy, grey
20 charger, black truck. Not talking over the phone no more."

21 292. After the text message by WILLIS was sent, at 1652 hours, surveillance Agents
22 observed WILLIS pull out of the mini mall parking lot and depart. During this time, Agents
23 monitoring the pole camera at the Verde Apartments observed G. PIERSON and Kristi PIERSON on
24 the porch of the K. PIERSON's residence. Agents monitoring the pole camera then observed G.

25
26 ²³ Your Affiant is aware "12" is a common term used by criminal street gang members in order to
27 identify law enforcement, "12" referring to the previous television show "Adam 12" which involved
28 LAPD officers patrolling the LA area.

1 PIERSON walk down the stairs from K. PIERSON's apartment. A few moments later, Agents
2 observe a red SUV move from the area around the apartment. Based on the timing of G. PIERSON's
3 departure, Agents believed G. PIERSON was in the red SUV. Agents knew from the previously
4 intercepted message that G. PIERSON was going to meet with WILLIS. Surveillance Agents did not
5 follow the SUV and remained at the apartment believing eventually G. PIERSON and WILLIS will
6 have to return in order to facilitate the movement of the firearms.

7 293. At 1656 hours, Agents monitoring the pole camera observed WILLIS' Buick arrive at
8 the Verde Apartments. Agents observed a black male adult, fitting the description of WILLIS, walk
9 up the stairs leading to K. PIERSON's apartment. About five minutes later, at 1701 hours, Agents
10 monitoring the pole camera observe the red SUV return to the apartment. Agents observed a black
11 male, fitting the description of G. PIERSON, walk up to the stairs leading to the apartment. About ten
12 minutes later, Agents monitoring the pole camera observed three males walk out of the apartment and
13 walk towards a red SUV and a black car. Agents observed the black vehicle move back towards the
14 hallway near the stairs to the apartment. Agents observed subjects enter the black vehicle. Agents
15 then observed one of the subjects place a bag or similar object in the rear of the red SUV. Agents
16 then observed the three vehicles leave in tandem.

17 294. A few minutes later, at 1714 hours, Agents intercepted a call from WILLIS, using
18 TT8, to R.G., using (661) 772-3561. During the call the following conversation occurred:

19 R.G.: Hello?

20 WILLIS: Hey you know what I was thinking about? Hey, cuz, cuz last night if he just wanna
21 tuck both of em at his grandpa house, so they not separate, so niggas wanna get out and do their shit
22 niggas can just go to one location. In case I ain't there or something, or you know what I mean,
23 whatever the fuck.

24 R.G.: That's what you gonna tuck both of em at, over there? He said not that big thang.

25 WILLIS: Alright.

26 R.G.: Alright.

1 PIERSON: Who called you?

2 WILLIS: Baby diesel called me but I already seen the car, I seen it, I'm not fixen to follow
3 you niggas, I fixen to turn off and take these niggas with me (U/I)...that shit goin' to voicemail,
4 cumon man I'm not even goin' say it's the homies cuz by if it is nigga can't fuck with these young
5 dummies my nigga that's on west side. (Break in conversation) I done lost the law, there's still two
6 laws at the corner with their lights on but I still got a truck following me cuz on the set this niggas
7 still behind me.

8 PIERSON: (Unintelligible)

9 WILLIS: Fixen to try to shake this truck...see if that's the homies cuz they say his grandpa
10 stay on third. ...see if that's the homies cuz they say his grandpa stay on third.

11 WILLIS continued to say the truck was leaving and he could get G.PIERSON. WILLIS said
12 he was going to get "the homie" and he needed to try to find the "little niggas."

13 299. Following this incident Agents monitored multiple calls during which WILLIS stated
14 he knew about the guns being seized, described placing the guns in the car, discussed his fingerprints
15 being on the guns, and specifically and correctly described the two guns that were seized.

16 300. Based on the above intercepted conversations, surveillance observations, and law
17 enforcement seizure and contact, your Affiant believes that WILLIS and G.PIERSON were in the
18 unlawful possession of an SKS style rifle and a Tech 9 handgun recovered from the red SUV, in
19 violation of Title 18, United State Code, Section 922(g)(1).

20 301. Your Affiant is aware that WILLIS is a convicted felon and prohibited from
21 possessing firearms. Your Affiant reviewed criminal history records and confirmed WILLIS was
22 convicted of PC 245 (A)(1) Assault with a Deadly Weapon, a felony punishable by more than one
23 year imprisonment.

24 302. Additionally, your Affiant is aware G.PIERSON is a convicted felon and prohibited
25 from possessing firearms. Your Affiant reviewed criminal history records and confirmed

1 G.PIERSON was convicted of 25850 (C)(3) Criminal Street Gang member carrying a firearm, a
2 felony punishable by more than a year in prison.

3 303. On 11/17/2017 Alcohol, Tobacco, Firearms and Explosives Special Agent Brad
4 Dickey who has specialized training in the manufacture, origin, and identification of firearms
5 examined photographs of the the SKS rifle, serial number 18007169P and the AA Arms Inc. 9mm
6 serial number 045721. Upon his review, he concluded that these firearms were not manufactured in
7 the state of California, and therefore, traveled in and affected interstate commerce.

8 304. Based on the above evidence, I believe there is probable cause for the issuance of
9 arrest warrants for G.PIERSON and WILLIS for the unlawful possession of a firearm, in violation of
10 Title 18, United State Code, Section 922(g)(1). Additionally, I believe there is probable cause to
11 search the residences of K.PIERSON, G.PIERSON, and WILLIS for evidence of this violation.

12 305. As noted above, the aforementioned firearms were stored at K.PIERSON's residence.
13 As such, I believe there is probable cause to search 3030 Verde Street, Apt. 19, Bakersfield, CA for
14 evidence of a violation of 18 U.S.C. § 922(g)(1), for example, ammunition fitting these weapons,
15 documentation about these weapons, etc. This evidence further demonstrates that K.PIERSON's
16 apartment is used in furtherance of the WSC criminal activity and, thus, there is probable cause to
17 search K.PIERSON's residence for evidence of violations of 18 U.S.C. § 1962(c), (d) (Racketeering
18 Influenced and Corrupt Organizations/Conspiracy). This is in addition to the probable to search the
19 residence for evidence of drug trafficking based on the November 1, 2017 drug transaction detailed
20 above that occurred between T.THOMAS, J.T., CRAWFORD, and FERNANDEZ.

21 306. Furthermore, there is probable cause to search 1321 N Street, Bakersfield, CA, the
22 residence of G.PIERSON. As noted above, Agents have determined 1321 N Street is where
23 G.PIERSON resides. I believe evidence will be at G.PIERSON's residence due to the previously
24 detailed call over WILLIS' phone, during which G.PIERSON explained he keeps a .45 on his "hip."
25 Based on this statement, I believe G.PIERSON regularly carries a firearm and evidence of that
26 firearm possession will be located at his residence. I am aware based on the wiretap investigation,
27

1 that G. PIERSON is involved with other criminal activity. Intercepted calls during the wiretap
2 investigation revealed G. PIERSON and CRAWFORD discussed robbing a drug dealer. On October
3 25, 2017, at 2114 hours, CRAWFORD, using TT1, called G. PIERSON, using 661-599-9741.
4 During the call, CRAWFORD told G. PIERSON he had a “play.” CRAWFORD told G. PIERSON
5 that he had a Mexican connection who had access to “pounds” of whatever they wanted, heroin, or
6 meth. CRAWFORD told G. PIERSON that T. THOMAS wanted 10 to 20 pounds that would cost
7 about \$50,000. CRAWFORD suggested he could arrange the deal between T. THOMAS and the
8 dealer. CRAWFORD suggested that he and G. PIERSON could follow the dealer following the sale
9 of the drugs to T. THOMAS. Once the dealer took the money, they could take it from him. G.
10 PIERSON responded by saying, “Alright.” CRAWFORD continued to tell G. PIERSON that T.
11 THOMAS did not want CRAWFORD to rob the dealer because it would “burn bridges.”
12 CRAWFORD calculated that if T. THOMAS purchased 10 to 20 pounds, at \$2,300 or \$2,500 a
13 pound, that would be “50 bands.” G. PIERSON responded by saying, “Hell yeah, we need that right
14 now.” CRAWFORD and G. PIERSON then discussed how to accomplish the robbery.
15 CRAWFORD explained that the dealer was only a middleman, and they could follow the dealer to
16 whoever originally sold the drugs, whom CRAWFORD believed to be a “Mexican Paisa.” G.
17 PIERSON suggested to CRAWFORD that they just, “bounce out on them right when he leaves.” G.
18 PIERSON told CRAWFORD that it would be difficult once the dealer got into the car. CRAWFORD
19 and G. PIERSON continued to discuss how they would accomplish the robbery. G. PIERSON then
20 asked if the Mexican had “fire weed.” CRAWFORD told him that the Mexican had crystal.

21 307. Based on the above call, I believe CRAWFORD and G. PIERSON discussed
22 conducting the robbery to earn money to fund criminal activity conducted by the WSC. During the
23 call, after discussing that they could earn \$50,000, G. PIERSON said, “We need that right now.”
24 Based on my knowledge of this investigation, I believe G. PIERSON was referring to the WSC
25 needing that money to further their drug trafficking and other criminal activity.

1 308. Based on G. PIERSON's involvement in the above criminal activity, there is also
2 probable cause to search 1321 N Street, Bakersfield, CA, G.PIERSON's residence for violations of
3 18 U.S.C. 1962(c),(d) (Racketeer Influenced and Corrupt Organizations) including indicia of
4 G.PIERSON's membership and participation in the WSC, as well as evidence of his agreement to
5 violate section 1962(c) in violation of section 1962(d), and his participation in the conduct of the
6 WSC's affairs through a pattern of racketeering activity in violation of section 1962(c).

7 309. Lastly, based on the facts set for herein, there is probable cause to search 4032 O
8 Street #22, Bakersfield, CA, the residence of WILLIS. As noted above, Agents have determined this
9 address to be WILLIS's residence. Based on facts detailed above, I believe WILLIS is involved with
10 the movement of firearms for other WSC members. Additionally, there have been numerous
11 intercepted calls since the November 7, 2017 seizure where WILLIS speaks openly about having a
12 gun with him in his car. On November 16, 2017, during a phone call with UM-418 using phone
13 number 310-248-0600, WILLIS stated he had recently shown several guns to UM-418 at WILLIS's
14 residence. Just prior to this call, surveillance observed a subject departing 4032 O Street #22. This
15 leads me to believe that evidence of his firearms possession will be located at his residence.

16 310. I believe in addition to firearms evidence being located at WILLIS's residence,
17 intercepted calls have revealed WILLIS is involved with the trafficking of controlled substances
18 likely heroin²⁴ from his residence. After reviewing multiple intercepted calls and text messages, I
19 believe B.C., a girlfriend of WILLIS lives at the residence with WILLIS, and participates in the sale
20 of controlled substances, likely heroin. On November 5, 2017, during a telephone call (Call 2435)
21 between WILLIS and B.C., the two discuss a customer who went to the residence to get "three bags".
22 WILLIS told B.C. he already made three sales for the day. Based on this call, I believe a customer
23 purchased three bags of an unknown quantity of heroin at the residence. On November 8, 2017, at
24 1528, WILLIS, using TT8, called B.C., call number 3419. During the call, WILLIS said he had made

25
26 ²⁴ During various intercepted communications, WILLIS and CARTWRIGHT discussed subjects
27 smoking the product. Based on my training and experience, I know that heroin can be smoked.

1 three sales since he had been over at her (B.C.'s) daddy's house. On November 8, 2017, 2041 hours,
2 B.C. sent a text message to TT8, used by WILLIS. The text message read, "Ralph call me askn me if i
3 needed a 3 smh he was outta twm wrkn." WILLIS responded by texting, "U tell em we selling 3's
4 now". Later, on November 8, 2017 hours, B.C. sent a text message to TT8 that read, "Man pple cumn
5 for black fuk". The above communications provide further evidence that B.C. and WILLIS conspire
6 to sell controlled substances from their residence. Additionally, based on the reference to "black," I
7 believe they are engaged in the sale of heroin. Based on my training and experience working drug
8 related investigations, I am aware that black is a reference to black tar heroin. On November 9, 2017,
9 at 1135 hours. TT8, used by WILLIS, sent a text message to B.C. that read, "Wheres the scale". B.C.
10 responded, "U left it n my car". This communication leads me to believe that evidence of WILLIS
11 and B.C.'s drug trafficking will be located in their vehicles.

12 311. Consequently, I believe that the evidence set forth above, and in the preceding section
13 as well as WILLIS's criminal history and documented WSC status, provides probable cause to search
14 WILLIS's residence, 4032 O Street #22, Bakersfield, CA, for evidence violations of: 21 U.S.C. §
15 846, 841(a)(1) (conspiracy to distribute controlled substances); 18 U.S.C. § 922(g)(1) illegal
16 possession of a firearms in violation of section 922(g)(1); and 18 U.S.C. § 1962(c)(d) (Racketeer
17 Influenced and Corrupt Organizations) including indicia of WILLIS's membership and participation
18 in the WSC, as well as evidence of his agreement to violate section 1962(c), his own participation in
19 violent crimes on behalf of the WSC, and his participation in the conduct of the WSC's affairs
20 through a pattern of racketeering activity.

21 **M. November 4, 2017 Robbery of Marijuana Dealer (Probable Cause to Arrest Manuel**
22 **CRUZ III; Probable Cause to Search the Residences of P.DEAN and JONES)**

23 312. On November 4, 2017, at 1825 hours, agents intercepted an incoming call to
24 CRAWFORD, using TT1, from Manuel CRUZ III, using telephone number 661-376-8702 (call 7009
25 on TT1). During the call, CRUZ asked what CRAWFORD was doing. CRUZ asked if CRAWFORD
26 was trying to "hit this fool." CRUZ said, "This fool, he gots the P." CRAWFORD asked if it was a
27

1 whole "P." CRUZ said, "Yeah, the fire tree." CRAWFORD asked what kind? CRUZ said it was of
2 the one he sent CRAWFORD. CRAWFORD asked if he (meaning the subject with the P) was by
3 himself. CRUZ asked, "Huh?" CRAWFORD said to ask the guy who he was with. CRUZ said he
4 was just with one of his other homeboys. CRAWFORD asked CRUZ to send a picture of the guy
5 again and asked what the guy's name was. CRUZ said his name was, "█████ Something."
6 CRAWFORD said he thought he knew who it was and asked CRUZ to send a picture. CRUZ said he
7 would send it to CRAWFORD.

8 313. Based on my training, experience, and knowledge of this investigation, I believe
9 CRUZ was reporting a marijuana dealer to CRAWFORD so CRAWFORD could rob the dealer.
10 CRUZ asked if CRAWFORD was going to "hit the fool" and explained the subject had a whole "P". I
11 know from my experience working gang and drug related cases, that "hit" is a term used by gang
12 members that means to rob. Additionally, I know that "P" is a reference to a pound. Commonly, "P"
13 is a reference to a pound of marijuana. I am aware from this investigation that both CRUZ and
14 CRAWFORD are involved with the sale and distribution of marijuana. CRAWFORD also confirmed
15 with CRUZ the subject had a whole pound. CRUZ said the subject did have the whole pound and
16 that it was "fire tree." I am aware that fire is a term used to describe the quality of Marijuana and tree
17 is a term used to describe Marijuana. During the call, CRAWFORD also tried to determine if the
18 marijuana dealer was by himself. I believe CRAWFORD was gathering this information to
19 determine if a robbery of the dealer was feasible. CRUZ said the dealer was with one "homeboy."
20 CRAWFORD then instructed CRUZ to send a picture of the guy and CRUZ agreed.

21 314. At 1827 hours, CRUZ texted CRAWFORD (call 7013 on TT1), "Uli sent u the pic on
22 snap". During the message, I believe CRUZ had informed CRAWFORD that CRUZ sent a picture of
23 the marijuana dealer on snapchat, a social media service used by user to communicate, primarily
24 though images and videos.

25 315. At 1830 hours, agents intercepted an incoming call to CRAWFORD, using TT1, from
26 CRUZ, using telephone number 661-376-8702. During the call, CRUZ asked if CRAWFORD got it.

1 CRAWFORD said he was looking. CRUZ asked if CRAWFORD was coming to get it.
2 CRAWFORD said, "That is on the dead homies that this nigga knows me." CRAWFORD then said
3 he didn't. CRAWFORD said, "Alright, tell him to meet us." CRUZ asked if the same address as last
4 time. CRAWFORD then said no, and to ask him (the dealer) where he was at and they would meet
5 him (the dealer). CRUZ agreed. CRAWFORD instructed CRUZ to tell CRAWFORD where the
6 drug dealer was and CRAWFORD would let CRUZ know if he wanted to go over there.

7 316. Based on my training, experience, and knowledge of this investigation, I believe
8 CRAWFORD and CRUZ were still discussing robbing the marijuana dealer. CRUZ asked if
9 CRAWFORD got the picture on snapchat. I interpret CRAWFORD's response to mean that
10 CRAWFORD looked at the picture and at first thought the subject knew him but then realized he
11 didn't. I believe CRAWFORD was making sure the subject didn't know him so he could rob him
12 without being identified. CRUZ then asked if he wanted to have the marijuana dealer meet him at the
13 same place and CRAWFORD said no. Based on my knowledge of this investigation I believe that
14 CRUZ has previously set up robberies for CRAWFORD. CRAWFORD then told CRUZ to ask the
15 marijuana dealer where he was and then CRAWFORD would decide on whether or not to go to the
16 dealer. This is further evidence that CRAWFORD was orchestrating a robbery. During a robbery
17 attempt of the marijuana dealer, CRAWFORD would be cautious of the location where the robbery
18 would occur. CRUZ agreed to help set up the marijuana dealer.

19 317. At 1915 hours, CRUZ texted CRAWFORD, over TT1, "He outside the pad g". At
20 1921 hours, CRAWFORD texted CRUZ, "Werehere". CRAWFORD then also texted CRUZ, "Here"
21 Based on the prior conversation, I believe that during these text messages, CRUZ was informing
22 CRAWFORD of the marijuana dealer's location.

23 318. At 1923 hours, agents intercepted an outgoing call from CRAWFORD, using TT1 to
24 CRUZ, using telephone number 661-376-8702. During the call the following conversation took
25 place:

26 CRUZ: Hello.

1 CRAWFORD: Where they at?

2 CRUZ: They said they're there.

3 CRAWFORD: There not here.

4 CRUZ: Alright, hold up. Hold up.

5 CRAWFORD: Alright.

6 (There was a long pause as CRUZ sounded like he put the phone down.)

7 CRUZ: He said, he said that he was there. You don't see no one right there.

8 CRAWFORD: No. What kind of car does he drive?

9 CRUZ: Uh, that's what I just asked him.

10 CRAWFORD: I'm in a black car.

11 CRUZ: Huh?

12 CRAWFORD: I'm in a black car.

13 CRUZ: You're in the black car?

14 CRAWFORD: Yeah.

15 CRUZ: Alright hold up, I'm waitin', I'm just waiting for him to text me back.

16 (CRAWFORD engaged in background conversation.)

17 CRUZ: Huh?

18 CRAWFORD: No, I was talking to the homies.

19 CRUZ: Oh

20 CRAWFORD continued background conversation. Towards the end, CRAWFORD said, "I
21 think cuz has it on him."

22 319. Based on my training and experience, I believe CRAWFORD was looking for the
23 Marijuana dealer but couldn't find him. CRUZ was in contact with the dealer and was trying to locate
24 him so CRAWFORD could find him. At the end, CRAWFORD said, "I think cuz has it on him."
25 Based on my knowledge of this investigation, and the nature of the incident, I believe CRAWFORD
26 was saying one of the people in the car with him had a gun.

27

28

1 CRAWFORD: Yeah.

2 CRUZ: It is by Payless?

3 CRAWFORD: Yeah, around the corner.

4 CRUZ: Yeah, he said, he's right there, right there by, by there fucking, he said a grey
5 Volkswagen.

6 CRAWFORD: He said he's in a what?

7 CRUZ: He's in a grey Volkswagen.

8 CRAWFORD: Tell his ass he's supposed to be by the park. Well, tell him say, tell him alright,
9 tell him...

10 CRUZ: He said, he's in a, he's in a, he's in the, he's on Q street.

11 CRAWFORD: I know you gave him the wrong address then. Tell him yeah, it's by Payless.
12 Tell him...

13 CRUZ: Yeah.

14 CRAWFORD: ...across the street from the park.

15 CRUZ: Across the street from the park?

16 CRAWFORD: Yeah.

17 CRUZ: Alright. Is it right there or what? What's the park called?

18 CRAWFORD: Across the street from Lowell Park.

19 CRUZ: The what?

20 CRAWFORD: Lowell Park.

21 CRUZ: Alright.

22 CRAWFORD: Hey hold on don't text him nothin'."

23 324. During the above call CRAWFORD and CRUZ were still trying to arrange for
24 CRAWFORD to find the marijuana dealer. CRUZ said the dealer was in a grey Volkswagen and said
25 he was on Q St.

26

27

28

1 CRUZ: They got what?

2 CRAWFORD: They hopped out knockin' bro. Delete everything about that shit.

3 CRUZ: Alright, then.

4 CRAWFORD: Delete it, delete your account everything.

5 CRUZ: Alright.

6 328. Based on my training, experience, and knowledge of this investigation, I believe
7 CRAWFORD just told CRUZ he shot the marijuana dealer and believed he killed him.

8 CRAWFORD said it went "sour" and he had to down him (shoot him). He then told CRUZ to delete
9 everything. I believe CRAWFORD wanted CRUZ to delete all forms of contact, messages, social
10 media, contact info, etc. so law enforcement could not connect CRAWFORD or CRUZ to the
11 shooting. CRAWFORD said he killed the "the nigga" and again told CRUZ to delete everything.
12 CRUZ then demonstrated a total lack of remorse of the fact that CRAWFORD said he killed someone
13 and asked if CRAWFORD got the marijuana. CRAWFORD said he didn't because they (the dealer
14 and his associates) came out "knockin" (shooting). CRAWFORD then again repeated to delete
15 everything and to delete his account.

16 329. At 1947 hours, agents intercepted an outgoing call from CRAWFORD, using TT1 to
17 CRUZ, using telephone number 661-376-8702. During the call ,CRAWFORD and CRUZ had the
18 following conversation:

19 CRUZ: What app?

20 CRAWFORD: Hey the whole... Listen delete all my shit out of there, your shit too.

21 CRUZ: Yeah, I did, I already did. I deleted it from Facebook and everything.

22 CRAWFORD: Alright.

23 CRUZ: Well, what happened?

24 CRAWFORD was again instructing CRUZ to delete all information.

25 330. Surveillance units continued looking for CRAWFORD or a victim in the area but
26 could not locate either. Officer Sanchez went the area of 621 O St and saw there were still multiple

1 vehicles and people in front of the residence. Officers also responded to the hospital. At the hospital,
2 Officers located a shooting victim named [REDACTED]. [REDACTED] was not
3 cooperative with law enforcement and did not provide any information to investigating officers.
4 Agents believe [REDACTED] was the subject shot by CRAWFORD because of the timing of his
5 injuries as well as the comment made by CRUZ to CRAWFORD earlier that the subject's name was
6 "[REDACTED] Something."

7 331. At approximately 2010 hours, Officer Sanchez observed a dark vehicle leaving the
8 area from in front of 621 O St, where Officer Sanchez had observed subjects gathered. The vehicle
9 left the area with no lights on and began travelling west away from the house. Agents surveilled the
10 vehicle as it left the area of the residence with no headlights on. Agents then requested a vehicle stop
11 be conducted on the vehicle by marked BPD units. At approximately 2017 hours, BPD Officer Garcia
12 initiated a traffic stop of the vehicle and contacted WSC gang member Jonathon KNIGHT. Officer
13 Garcia conducted a brief field interview and let KNIGHT go.

14 332. At 2015 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
15 Paul DEAN, using TT9. During the call, CRAWFORD asked where DEAN was. DEAN said he was
16 at his cousin's house. CRAWFORD said, "I need to pull up and holla at you. It's important as fuck."
17 DEAN said he was near Ridgeview High School. CRAWFORD asked where the closest place
18 DEAN could meet him. CRAWFORD said, "Meet me right now dub. On the hood nigga." DEAN
19 said he would meet CRAWFORD anywhere and CRAWFORD said he was in the "hood." DEAN
20 agreed to come to the hood and meet CRAWFORD. CRAWFORD said, "Come to the hood. It got
21 hella spunky. Come to the hood." CRAWFORD said, "Remember the hole in the backyard? That
22 kind of spunky." DEAN asked, "Huh?" And CRAWFORD repeated it was like the hole in the
23 backyard. At 2022 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
24 DEAN, using TT9. During the call, CRAWFORD asked, "What's up where you at?" DEAN said, "I'm
25 almost there, I'm coming in right now." CRAWFORD said, "Come on." At 2028 hours, agents
26 intercepted an outgoing call from CRAWFORD, using TT1, DEAN, using TT9. During the call,

1 CRAWFORD said, "Whats up fool, where you at, it's important." DEAN said, "I'm almost there, I'm
2 on the freeway nigga, come closer to me then." CRAWFORD asked, "What's closer to you?" DEAN
3 said, "Shit I dunno, right there on the 58. The 99 turns into the 58." CRAWFORD said, "You already
4 here then ain't ya." DEAN said, "I'm fitting to being there I right on the 99. Yeah the AM PM is
5 cool." CRAWFORD said, "Alright." DEAN said, "Alright."

6 333. Based on my training, experience, and knowledge of this investigation, I believe
7 CRAWFORD wanted to meet with P.DEAN regarding the shooting CRAWFORD just committed.
8 CRAWFORD instructed DEAN to come to the hood (WSC gang territory) and meet with him.
9 P.DEAN agreed to come. CRAWFORD said it got "spunky" and that it was like the "hole in the
10 backyard." I believe CRAWFORD was referencing a previous shooting that he and P.DEAN would
11 both know about but CRAWFORD said it in a way so he didn't have to say on the phone that he just
12 shot someone. Based on that phone call, agents believed CRAWFORD was going to meet with
13 P.DEAN and possibly give him the firearm or other evidence of the shooting and attempted robbery
14 of [REDACTED]. Surveillance responded to known locations for P.DEAN to try and find him and
15 follow him to the meeting with CRAWFORD.

16 334. Based on that call, agents believed CRAWFORD and P.DEAN were going to meet at
17 the AM/PM store located on Brundage and H St. The surveillance team responded to that area. The
18 surveillance team planned to have a traffic stop initiated on CRAWFORD if surveillance located him
19 prior to meeting with P.DEAN. If they could not locate them before the meeting, then they planned
20 to have both subjects stopped in an effort to recover evidence of the shooting and attempted robbery.

21 335. At 2029 hours, agents intercepted an incoming call to CRAWFORD, using TT1, from
22 A.H., using telephone number 661-303-3926. During the call the following conversation occurred:

23 A.H.: Why do I have to leave, what the fuck did you do with fucking my car?

24 CRAWFORD: Nothing, I was just telling you that it was not safe.

25 A.H. again asked if CRAWFORD did something to her car. CRAWFORD said he did not.

1 CRAWFORD: I was driving down the street and we came back because we heard some
2 gunshots.

3 A.H. said she was back at his grandma's house. CRAWFORD said he would call A.H.'s father
4 so he can come get him. A.H. asked, "What? What did you say?" CRAWFORD told her to never
5 mind.

6 336. Based on my knowledge of this investigation, I know that A.H. is an associate of
7 CRAWFORD and she owns a black Volvo. She was asking CRAWFORD if he did something with
8 her car and CRAWFORD said he did not. CRAWFORD talked about hearing gunshots while driving
9 and said he came back. Based on this call, I believe CRAWFORD used A.H.'s vehicle during the
10 shooting and he was lying to A.H. and made up a story about gunshots in the area. Following the
11 shooting, on November 8, 2017, BPD Officers stopped A.H. in her black Volvo, California license
12 plate 6SXX523, and discovered she had a bullet hole in the vehicle. On November 14, 2017,
13 Detective Pair and Detective Gavin conducted an interview of the victims from the November 4,
14 2017 marijuana robbery. The hispanic male victim (HVM-1) who was outside waiting in his car said
15 that he observed a black male walk to the front of 710 R Street which prompted him to approach the
16 front of the house. As he approached the front door, he heard the black males instructing the other
17 hispanic male victim (HVM-2) to contact HVM-1 and to tell him to come inside. This prompted
18 HVM-1 to kick the front door on 710 R Street. HVM-1 said the two black males inside the house
19 shot him as he was at the entrance. I learned from Detective Pair and Detective Gavin that the
20 impacts on the front door of 710 R Street are consistent with rounds striking the door after it had been
21 kicked inward. I believe based on the information above that this would support why A.H.'s vehicle
22 was struck due the rounds traveling from inside the home outward toward the street. HVM-1 was
23 struck by gunfire several times at the front door.

24 337. At approximately 2035 hours, SA Compston observed a silver Buick, California
25 license plate 6XXK836, driving on Brundage approaching the AM PM. SA Compston recognized
26 this vehicle from previous surveillance operations and knew this was the vehicle P.DEAN had been
27

1 driving. SA Compston observed the vehicle pull into the gas station and stop at the gas pumps. SA
2 Compston observed P.DEAN exit the vehicle. P.DEAN walked towards the front of the store and
3 met with a black male wearing a dark hoodie and long black shorts with white socks pulled up to
4 mid-calf. Other agents drove by the store right as the two subjects met and positively identified the
5 second subject as CRAWFORD. Both subjects then walked to the south towards the Taco Bell
6 parking lot out of SA Compston's view. SA Pacheco saw both subjects in the Taco Bell parking lot.
7 He observed they both engaged in a conversation with each other for a few minutes and then they
8 both walked back towards the AM PM. SA Compston observed P.DEAN walk in front of the store
9 towards the silver Buick. CRAWFORD walked along the front of the store and SA Compston lost
10 sight of CRAWFORD behind the traffic traveling on Brundage. The Buick left AM PM travelling on
11 Brundage. SA Compston did not see which vehicle CRAWFORD got into and several vehicles left
12 the gas station at once immediately after the Buick. Surveillance was unable to locate CRAWFORD
13 and we were not able to arrange for a traffic stop on CRAWFORD.

14 338. SA Pacheco arranged for BPD officers to stop the Buick due to our belief that
15 CRAWFORD had given him the firearm used in the shooting. BPD units stopped the vehicle in the
16 Panda Express parking lot at 1400 Brundage Lane. Officers contacted P.DEAN and a female
17 passenger but they did not locate a firearm and they released him from the traffic stop.

18 339. At 2044 hours, agents intercepted an incoming call to CRAWFORD, using TT1, from
19 E.C., using TT10. During the call, E.C. said he had "something" for sale. CRAWFORD asked who
20 was calling. E.C. said, "Eli." CRAWFORD asked what he had. E.C. said a "Glock 27" and described
21 it as a "40." CRAWFORD said, "You got a Glock for...where you at?" E.C. said, "At the house."
22 CRAWFORD said he was on the way to E.C.'s house. E.C. asked if CRAWFORD wanted to buy it.
23 CRAWFORD said, "On God." CRAWFORD said he was coming right now. E.C. said to watch it
24 because the law was hot over there. E.C. said police drilled his house but they didn't find the gun.
25 E.C. said they did a probation search. CRAWFORD asked, "But the police do it?" E.C. said the
26 police left an hour ago.

1 340. Based on my training, experience, and knowledge of this investigation, I believe
2 during the above conversation E.C. was trying to sell a Glock 27 to CRAWFORD. On this day, E.C.
3 had made numerous intercepted calls. During these calls, he repeatedly talked about going to an
4 unknown location and recovering a gun that was thrown from a stolen vehicle. He had also talked
5 about selling the gun. Based on these calls, Officers did a probation search of E.C.'s residence but
6 they did not find the gun. (E.C. is on active supervision with Kern County). E.C. offered to sell the
7 gun to CRAWFORD, who immediately agreed to purchase it. I believe CRAWFORD expressed
8 interest in acquiring the firearm because he had recently shot someone during a robbery attempt and
9 likely disposed of the gun used in that shooting.

10 341. At 2110 hours, agents intercepted an incoming call to CRAWFORD, using TT1, from
11 P.DEAN, using TT9. During the call CRAWFORD and DEAN had the following conversation:

12 P.DEAN: Hey what's going on man? I mean, who in the, when you left the house how you
13 leave the house?

14 CRAWFORD: I left the door open.

15 P.DEAN: No the door ain't open, the door is shut like somebody put the couch behind it.

16 CRAWFORD: Somebody put a couch, OG musta did that.

17 P.DEAN: Well how did he get out then? Is he still in the house?

18 CRAWFORD: Yeah, he gotta be in.

19 P.DEAN: Because I pull up and it's a pillow in the middle of the street and a bunch of blood
20 on the porch.

21 CRAWFORD: Okay, yeah, that's what, that's everything I saw. OG must be in the room.

22 P.DEAN: You sure?

23 CRAWFORD: Yeah I need somebody to go check that.

24 P.DEAN: Cause I don't wanna open this mother fucker and nigga start squeezing on me.

25 CRAWFORD: Nah.

26 P.DEAN: Like, fuck nigga.

1 CRAWFORD: I went inside. I went inside already there was nobody there. I didn't go in OG
2 room though that's what I'm saying.

3 P.DEAN: Well who shut the windows up then? The whole mother fucking...

4 CRAWFORD: I'm at Vnasty's." The call then lost audio.

5 342. At 2112 hours, agents intercepted an outgoing call from P.DEAN, using TT9 (661-
6 558-3079) to UM405's phone (661- 447-5724) (call 1980 on TT9). During the call, a UF answered
7 and said she called on accident. P.DEAN said he would call right back because there was a shooting
8 on "R Street."

9 343. Based on my training, experience, and knowledge of this investigation, I believe
10 P.DEAN was at the scene of the shooting/robbery. P.DEAN complained that the front door, possibly
11 referring to the front door of 710 R St, was closed and it seemed like somebody put a couch behind it
12 to keep the door closed. CRAWFORD said he left the front door open and they both talked about
13 how the OG (an older subject) must be in there and he must have done it. P.DEAN complained about
14 a pillow being in the middle of the street and there was blood on the porch. CRAWFORD said the
15 OG must have been in there and he wanted P.DEAN to check. P.DEAN was hesitant because he
16 didn't want to open the door and get "squeezed" (shot at). CRAWFORD said he was in the house and
17 that he just needed P.DEAN to check OG's room. CRAWFORD then said he was at "VNASTY'S"
18 house before the call lost audio. VNASTY is one of the monikers of WSC member J.W.

19 344. At 2112 hours, agents intercepted an outgoing call from P.DEAN, using TT9, to a
20 fellow WSC member, T.D., using 661- 384-0905. During the call, T.D. said he saw P.DEAN being
21 stopped by police. P.DEAN said he was mad because someone did some "bullshit." T.D. asked who
22 did the "bullshit" and P.DEAN said it was "AJ." T.D. asked what AJ did. P.DEAN said AJ just
23 called him and he met him at the Fastrip at the AM PM. P.DEAN said CRAWFORD tried to put a
24 move down and use "the spot" without letting a "mother fucker" know and had a shootout in the
25 "spot" and shot a "mother fucker." T.D. said that CRAWFORD asked to use that "girl's car too."
26 P.DEAN said he pulled up on R St. and blood was on the porch. P.DEAN said he was scared to go in
27

1 because he didn't have his "heat" on him. P.DEAN said he was waiting on a "nigga" to bring him his
2 "heat." T.D. asked P.DEAN what happened if someone was dead, because they would think P.DEAN
3 was involved.

4 345. Based on my training, experience, and knowledge of this investigation, I believe
5 P.DEAN was expressing his displeasure over the fact that CRAWFORD shot someone on R St,
6 possibly 710 R St. P.DEAN kept referring to the shooting location as "the spot." I believe P.DEAN
7 utilized that location, 710 R St, to conduct criminal activities and associate with other gang members.
8 He was upset that CRAWFORD shot someone there because now it would attract attention to the
9 location. He stated he was afraid to go inside the residence because he didn't have his "heat" (slang
10 term for gun). He said he was waiting for someone to bring him his gun. T.D. also expressed
11 concern that if CRAWFORD killed a subject that P.DEAN could be implicated in the act.

12 346. Based on the above calls and statements made by P.DEAN, in conjunction with
13 surveillance observations that P.DEAN frequented 710 R. St, agents believed this was the location of
14 the robbery/shooting scene. BPD units attempted to go to that location and try to locate the shooting
15 scene. Upon arrival, officers in fact located a crime scene at 710 R St. and they contacted an elder
16 male witness at the house. Officers located blood evidence at the scene and would later locate and
17 recover several fired bullets from the walls of the residence.

18 347. At 2113 hours, Officer Sanchez located the black Volkswagen, bearing California
19 license plate 7WYL290, parked on the street near 621 O St. Officer Sanchez also observed several
20 subjects in the street along with multiple black male adults. Officer Sanchez also observed
21 CRAWFORD in the street coming and going from one of the houses located there.

22 348. At 2120 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
23 E.C., using TT10. During the call the following conversation occurred:

24 E.C.: Hello?

25 CRAWFORD: This Eli?

26 E.C.: Yeah.

1 CRAWFORD: Hey I'm getting a ride over there bro, do not call nobody else okay.

2 E.C.: Alright.

3 CRAWFORD: No real bro, on the hood. Put that on the hood nigga.

4 E.C.: How much you gonna buy it for?

5 CRAWFORD: Nigga I dunno, however much I gotta give you I'm gonna give it to you, on the
6 hood bro. But just don't tell nobody.

7 E.C.: I'm not cuz.

8 CRAWFORD: Put that on the dead homies.

9 E.C.: To tell nobody what, that, that I got it for sale?

10 CRAWFORD: Yeah.

11 E.C.: I told my nigga Jalen, but cuz talking about 3, so I told him no.

12 CRAWFORD: No, bro don't fuck with that nigga, he fuck with that nigga Payso.

13 E.C.: Yeah. That's what I was telling cuz. Cuz was telling me, cuz was telling me, alright cuz,
14 he was like he go to me I'll fucking kill. I'm like nigga of course I came, then I was laughing nigga I
15 don't fuck with Payso.

16 CRAWFORD: Nigga on dubs, nigga them niggas, bro. That nigga Payso, drawn down on
17 Aaron, nigga what the fuck?

18 E.C.: Yeah that's what I told cuz, I said I don't fuck with Payso nigga and he was like why you
19 fuck with AJ I like I don't fuck with Payso, what the fuck nigga. That's my nigga, I said yeah, I got
20 you.

21 CRAWFORD: You fuck with me?

22 E.C.: Yeah.

23 CRAWFORD: I'm gonna slap you.

24 E.C.: But I got you though cuz.

25 CRAWFORD: I'm gonna be over there bro, like 20 or 30 minutes though on dub.

1 349. Based on my training, experience, and knowledge of this investigation, I believe
2 CRAWFORD was informing E.C. that he would be there in about 20 to 30 minutes to purchase the
3 gun. CRAWFORD told E.C. not to tell anyone else that he had the gun for sell. E.C. had been telling
4 multiple people that night that he had the gun for sale but he lied to CRAWFORD and told him he
5 only told "Jalen" (WSC gang member J.T.). CRAWFORD told E.C. not to associate with him
6 because he hung out with "Payso." Payso is WSC gang member D.W. D.W. and CRAWFORD do
7 not get along despite being in the same gang. E.C. assured CRAWFORD that he would only
8 associate with him and not D.W. and CRAWFORD said he would be there in about 20 or 30 minutes.

9 350. At 2125 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
10 P.DEAN, using TT9. During the call, CRAWFORD said, "The rollers just rolled by." Agents
11 observed P.DEAN's breathing was labored on the call as if he was out of breath. CRAWFORD asked
12 if P.DEAN found his jacket and keys. P.DEAN said, "No, I ain't seen no jacket or keys. All I seen
13 was the motherfucking shells I'm picking up off the floor. But, OG was in the room the whole time
14 you was putting the move down." CRAWFORD asked what did OG say. P.DEAN stated, "He came
15 in he heard ya'll motherfuckers arguing and something. The motherfuckers started shooting. The
16 motherfuckers ran. Then he said, whoever got shot was still in the house to for about 10 minutes. I
17 guess rambling and doing whatever. And then they left and I guess you had came back for a second
18 and left again. That's what he tell me." P.DEAN talked to someone in the background and told them
19 to turn right. CRAWFORD asked if OG had his jacket and keys. P.DEAN stated he will find out
20 when he goes back after he got rid of the shells. P.DEAN stated, "Blood and shit everywhere, nigga.
21 The house shot the fuck up, nigga." CRAWFORD interrupted P.DEAN and said, "Listen I got you.
22 On the hood." P.DEAN said he knew.

23 351. Based on my training, experience, and knowledge of this investigation, I believe
24 P.DEAN just admitted to removing evidence at a shooting/robbery scene on behalf of CRAWFORD.
25 CRAWFORD informed P.DEAN that the rollers, a slang term for the police, just went by and then
26 asked if he saw his jacket and keys. P.DEAN said he didn't and said all he saw was blood and shells
27
28

1 that he was picking up. I believe P.DEAN was informing CRAWFORD that he collected shell
2 casings from the shooting scene. P.DEAN went on to say that the "OG" was in the room the whole
3 time and heard everything that happened. He stated the OG heard them arguing and then the
4 shooting. He said one of the subjects waited inside the house for about 10 minutes before leaving.
5 CRAWFORD was still concerned about his jacket and keys and asked if the OG had them. DEAN
6 said he would go back and check after he got rid of the casings. P.DEAN then complained about the
7 house being shot up and blood being everywhere and CRAWFORD promised to fix the situation by
8 saying "I got you. On the hood."

9 352. At 2134 hours, agents intercepted an incoming call to CRAWFORD, using TT1, from
10 P.DEAN, using TT9. During the call, CRAWFORD and P.DEAN had the following conversation:

11 P.DEAN: They out on R, they just jacked a nigga right now, got a nigga jacked.

12 CRAWFORD: On R St.?

13 P.DEAN: They all up in there right now?

14 CRAWFORD: They inside the spot?

15 P.DEAN: I guess, yeah, I was in front of it passing by nigga. They got on me, I was jacked by
16 Emerson.

17 CRAWFORD: Alright, I'm gonna ride by. But, what's inside the house?

18 P.DEAN: Nothing.

19 CRAWFORD: Alright, I'm gonna ride by but I got you bro. On god. No shit. On god.

20 353. Based on my training, experience, and knowledge of this investigation, I believe
21 P.DEAN was reporting that law enforcement were at 710 R St. He further reported that they "jacked
22 a nigga" (conducted a traffic stop) and they jacked him by Emerson (stopped him by Emerson).
23 CRAWFORD was concerned with what was in the house but P.DEAN said nothing was there.
24 CRAWFORD said he would go by.

25 354. At 2154 hours, Officer Jeffries observed a BMW (the BMW was previously observed
26 at 6210 St.) travel to CRAWFORD's residence at 320 4th St. Officer Jeffries saw a passenger exit
27

1 the BMW and SA Pacheco drove by the residence and observed CRAWFORD going into the front
2 door of the residence. The surveillance set up on that location. The surveillance team was going to
3 watch and see if CRAWFORD left and if he did then have a BPD unit stop him to further investigate
4 the shooting incident.

5 355. At 2158 hours, agents intercepted an incoming call to CRAWFORD, using TT1, from
6 T.W., using telephone number 661-565-0887. During the call, T.W. asked where CRAWFORD was.
7 CRAWFORD said he was home. T.W. asked what happened. CRAWFORD told her to pull up
8 because he needed a favor. T.W. said she was coming. A few minutes later, at 2203 hours, agents
9 intercepted an outgoing call from CRAWFORD, using TT1, to T.W., using telephone number 661-
10 565-0887. During the call, CRAWFORD asked where she was. T.W. said she was on the freeway and
11 she was coming from Silvercreek. CRAWFORD complained she was taking a long time.
12 CRAWFORD said he would be at his house waiting.

13 356. At 2213 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
14 Travon WHATLEY, using TT4. During the call Agents overheard the following conversation:

15 CRAWFORD: Bro you at your grandma's?

16 WHATLEY: Nuh uh.

17 CRAWFORD: Fuck.

18 WHATELY: What happened?

19 CRAWFORD: What?

20 WHATLEY: I said what happened?

21 CRAWFORD: I need to tuck something.

22 WHATLEY: Oh you know I ain't there, I'm uh, I ain't go back there till like, like 30, 45
23 minutes.

24 CRAWFORD: Alright call me when you go back.

25 357. Based on my training, experience, and knowledge of this investigation, I believe
26 CRAWFORD was calling WSC gang member WHATLEY to store an illegal item at WHATLEY's
27

1 grandma's house. CRAWFORD said he needed to "tuck" something at WHATLEY's grandma's
2 house. I know from this investigation the term tuck is used to describe hiding something.
3 WHATLEY wouldn't be there for about 30 or 45 minutes and CRAWFORD told him to call him
4 when he got there. I believe CRAWFORD wanted to store the gun he used in the shooting or
5 possibly store the gun he was about to purchase from E.C. at WHATLEY's grandma's house.

6 358. At 2217 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
7 E.C., using TT10. The following conversation occurred during the call:

8 E.C.: Hello.

9 CRAWFORD: Hello, yeah I'm about to pull up.

10 E.C.: Alright, you gonna be outside?

11 CRAWFORD: Nah, like come outside in like five minutes.

12 E.C.: In five minutes?

13 CRAWFORD: Yep.

14 359. At approximately 2220 hours, SA Compston observed two vehicles park in front of
15 CRAWFORD's residence. One was a silver Chevy Impala and the other was a silver Honda bearing
16 California license plate 6UMU698. Both vehicles stayed parked on the street facing westbound. It
17 was too dark for SA Compston to see if anyone got in the vehicles or exited the vehicle. After a
18 couple of minutes, both vehicles left the residence at the same time. Officer Sanchez saw there were
19 two people in the Impala and he followed that vehicle. Investigator Szatmari saw that the Honda had
20 a female driver but he could not see if anyone was in the passenger seat. Investigator Szatmari
21 followed the Honda. As Investigator Szatmari passed the Honda, he observed there was a black male
22 passenger slouched down and leaning back in the right front passenger seat. Investigator Szatmari
23 did not get a good look at the passenger's face but the hairstyle and side profile looked like that of
24 CRAWFORD. Officer Jeffries maintained visual contact with the Honda. SA Pacheco tried to get a
25 BPD unit to make a traffic stop but they were too far away. The vehicle made it to Planz Rd. and
26 parked on Raider Ave. next to the apartment complex where E.C. resided.

1 360. After the arrival of the Honda at COBBIN's residence, SA Pacheco advised the BPD
2 Officers that the investigative team believed CRAWFORD just picked up a firearm and it was
3 believed that CRAWFORD had shot someone during a robbery earlier that night. Additional
4 information was relayed that CRAWFORD would be the passenger in the vehicle.

5 361. At 2225 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
6 E.C., using TT10. During the call, CRAWFORD said, "Hello, hey come, come to the side of the
7 apartments." E.C. said, "Alright."

8 362. At 2031 hours, agents intercepted an outgoing call from CRAWFORD, using TT1, to
9 a male subject using , using GUPTON's telephone number 661-772-3561 (call 7197 on TT1). During
10 the call, CRAWFORD asked, "This Tiny?" I know based on my experience with this investigation
11 that "Tiny" is WSC Skylor BILLINGS. BILLINGS said , "Yeah." CRAWFORD asked, "Where you
12 at?" BILLINGS said, "Same spot." CRAWFORD said, "So listen on the dead homie nigga, this, the
13 little homie nigga. The little homie just gave me something so go to your house so I can drop it off."
14 BILLINGS agreed and asked when. CRAWFORD said, "Like, right now."

15 363. Based on my training, experience, and knowledge of this investigation, I believe
16 CRAWFORD contacted WSC gang member BILLINGS . so CRAWFORD could store the firearm he
17 just purchased from E.C. at BILLING's house. R.G. agreed and CRAWFORD said he was coming
18 right now.

19 364. A short time after the above call, at 2233 hours, Officer Jeffries observed the lights
20 come on the Honda and it began traveling away from the apartments. A short distance away, a
21 marked black and white BPD patrol vehicle pulled in directly behind the Honda and activated its
22 emergency lights. The vehicle slowly pulled to the right curb. As the vehicle was pulling over a
23 second marked black and white BPD patrol vehicle approaching the traffic stop as well. As soon as
24 the Honda stopped, surveillance observed a black male with a dark hoodie, long dark shorts, and
25 white socks pulled up run from the passenger seat of the Honda. Surveillance recognized the clothing
26 as being the same clothing CRAWFORD was wearing earlier at the AM PM. SA Pacheco was
27
28

1 driving past the area where CRAWFORD was running and he observed both CRAWFORD and a
2 uniformed officer turn north into an unlit area and where SA Pacheco could no longer see either. SA
3 Pacheco then heard several shots being fired. Later investigation revealed CRAWFORD was shot
4 and killed by a BDP Officer. A Glock 27 was located in the vicinity of CRAWFORD's route of
5 travel after he fled from the Honda leading officers to believe he possessed a firearm.

6 365. Meanwhile, during the foot chase of CRAWFORD, the Honda drove away.
7 Surveillance units maintained surveillance on the Honda. During the surveillance of the Honda, at
8 2234 hours, agents intercepted an incoming call to CRAWFORD's phone, TT1, from WILLIS, using
9 TT8. During the call, T.W., the driver of the Honda, was using TT1. The following conversation
10 occurred:

11 T.W.: Hey that nigga just, we just got pulled over and that nigga took off running. And they
12 was shooting, they was shooting gunshots too. I uhm, when they took off I drove off, when they took
13 off after him.

14 WILLIS: Hey, uhm, fuck cuz.

15 T.W.: I heard gunshots though, but uh.

16 WILLIS: So they was knocking at him? Fuck.

17 T.W.: Do the, do the police cars have cameras on their cars?

18 WILLIS: I dunno, they say it do though, they be saying it though.

19 T.W.: Cause I drove off. Like, you know they took off running after him and I drove off.

20 WILLIS: He ain't leaving nothing in the car though did he?

21 T.W.: I don't think so.

22 WILLIS: Where you all get blurpped at? Where you all get blurpped at? Huh?

23 366. TT1 started cutting out and T.W. could no longer be understood when she spoke.
24 WILLIS said, "You said where?" T.W. still couldn't be understood but she said she was trying to put
25 the phone on speaker. WILLIS said, "I can't even hear you." WILLIS said "Oh hold on. You said
26 where?" The call then disconnected.

1 367. Based on my training, experience, and knowledge of this investigation, I believe T.W.
2 was reporting the shooting to WILLIS. T.W. accurately described CRAWFORD running from the
3 vehicle and officers chasing him and then shots being fired. T.W. then expressed her concern that
4 BPD cars might have cameras because she fled the scene. T.W. was later stopped in the Honda and
5 contacted by law enforcement.

6 368. Based on my training, experience, and the observations during surveillance, the
7 intercepted calls, and my knowledge of this investigation, I believe that CRAWFORD conspired with
8 CRUZ to commit a robbery of a marijuana drug dealer. CRUZ set up the deal knowing that
9 CRAWFORD would rob them. When CRAWFORD attempted to rob the Marijuana dealers, an
10 altercation occurred which resulted in CRAWFORD shooting one of the subjects. CRAWFORD
11 reported the shooting to CRUZ and expressed his belief that he killed one of the subjects. Despite
12 this, CRUZ still inquired if CRAWFORD recovered the marijuana. CRAWFORD said he didn't and
13 then instructed CRUZ to delete all the social media or any contacts with him or the victims so the
14 shooting could not be tied back to them. CRUZ agreed. Based on the above evidence, there is
15 probable cause to believe that CRUZ was in violation of conspiracy to possess with intent to
16 distribute marijuana, in violation of Title 21, United States Code, Section 846, 841(a)(1).

17 369. After CRAWFORD committed the robbery/shooting, he contacted P.DEAN and met
18 with P.DEAN in person. I believe CRAWFORD explained what happened at R St. and recruited
19 P.DEAN to assist with the collection and destruction of evidence at the shooting scene. P.DEAN
20 made multiple calls to subjects during which he made it clear he knew that CRAWFORD had shot
21 someone at 710 R St. P.DEAN was then intercepted in a call telling CRAWFORD that he was
22 collecting shell casings at R St. and that there was blood everywhere. Officers did not locate any
23 shell casings at the shooting scene.

24 370. On November 5, 2017, as intercepted on DEAN's TT#9, P.DEAN made an outgoing
25 call to UM383 at telephone number 661-558-5136. During the conversation, P.DEAN said,
26 "Whatcha doin' man." UM383 said, "Nothin' I just heard about the police killed AJ (CRAWFORD)

1 last night, man." P.DEAN said, "Yeah, man, the nigga, been, it started on R Street (710 R Street),
2 man." UM283 asked, "Hey what happened, because I just, I saw it on the news. I just heard. Man.
3 What happ... I didn't see it was AJ. I just saw officer involved shooting and I just kept turnin' the
4 TV." P.DEAN said, "They call me and say, um, I'm going to R Street. Fuck you going to R Street
5 for? He said I'm fittin' to do something. Come over here right now. I got something for you."
6 UM383 said, "Uh, huh." P.DEAN said, "So I'm like alright. I'm at TINY's. I'm on, I'm on my way to
7 R Street." UM383 said, "Uh, huh." P.DEAN said, "Boom. Before I get [Audio glitch] called me he's
8 like man, man, it's all bad. I'm like what, what's all bad? What the fuck. He was like shit. Man, I
9 can't talk on the phone. Where you at?" UM383 said, "Yeah, yeah." P.DEAN continued, "Shit, I
10 made it to R Street like you just said. I was like meet me at AM/PM. Nigga, alright I'm on my way.
11 So I get to AM/PM and he jump out and we, we walk up in AM/PM. Just me and him. He with
12 Yolanda's son (J.K.)."

13 371. UM383 said, "Um, huh." P.DEAN said, "Right. He looking at me with that look in
14 his face. I'm like what's up nigga. Like what the fuck..." UM383 said, "He, he with Jerm."(J.K.)
15 P.DEAN said, "Yeah, I'm like what the fuck up. What's up. He's like man, I think I left somebody
16 dead on the floor in R Street. I'm like what! What the fuck you mean you left a mother fucka dead
17 on R Street on motha fuckin' living room my nigga." UM383 said, "Yeah, yeah." P.DEAN
18 continued [while UM383 continued to make active listening comments intermittently], "He's like,
19 man, I don't know if he still there or not man, but man, one look, man, just listen, man. I'm like nigga
20 nah, fuckin' he better tell me every mother fuckin' thing goin down my nigga. I said all this tryin' to
21 sugar coat shit nigga because first of all nigga you shouldn't be doing that shit without lacing me up.
22 My goddamn house. No mother fuckin' way, nigga, I said whatever you did, I said what happened.
23 He like, man, the Mexican got 60, 70 racks man. We was acting like we was gonna buy some dope
24 from 'em or I mean sell 'em some dope. One Mexican stayed in the car and the other Mexican got out,
25 and uh, we walked in the house and shit, but the Mexican came up in the house had his phone on
26
27
28

1 speaker and he was talkin' to his other homie in the car. So when he came in [UI] that's when he
2 break he self tryin' to rob him. But the dude in the car heard it on the phone, he run..."

3 372. UM383 said, "He came in." P.DEAN said, "came in shooting, came in fucking
4 shooting and he say he bust in the door fucking shooting and shit, he missed me and I start squeezing
5 off. I pop him and he falls and the other nigga that was in there [UI] Shit, run out the door jump over
6 him and I run behind him jump over dude leave him there, dude move, I ran down the street. And the
7 other Mexican, I don't know I guess he pulled off, but I don't, the other way, but I left him there. I'm
8 like what! [UI] I'm like hello no my nigga, like [UI] I don't know, so I creeped up on the street like
9 Boom. Lookin' around it's dark. When I commin' up R Street I see one of my couch pillows in the
10 middle of the street. The pillows from the couch." UM383 said, "Why?" P.DEAN said [while
11 UM383 continued to make active listening comments intermittently], "That's what I'm say, that's what
12 the fuck this pillow doing way in the fuck out here, right. So boom, I pick up the pillow up, now, I'm
13 creepin to the door. I see blood everywhere nigga. Like, like ketchup shit. All on the porch [UI] in
14 the house right. So I push the door open in the house, bullet holes everywhere nigga, blood
15 everywhere nigga, boom, I'm looking. I don't see nobody, right, so I go to OG room. OG in the room
16 under the cover right. I went OG. I'm like mother fucker [UI]..." UM383 said, "He don't know
17 nothin'." P.DEAN said, "I say, he know somethin'. Cause the way he was reachin' he was... [UI]
18 cover scared as poop right." UM383 said, "Dang, um." P.DEAN said, "So I tell nigga what
19 happened OG. He's, he's sayin, I say I'll break your god damn ribs nigga you don't tell me what the
20 fuck happen. He was like I was up in the house, lil, little homie AJ and them come up in here, but
21 they don't know I was up in here. I heard 'em arguing and shit. Then I heard gunfire. Then I heard
22 mother fucker run out. He said I looked out the room door. I see somebody laying on the floor, so I
23 run back up in the room and shut my door. And he said who [UI] in the room." UM383 said,
24 "Dang." P.DEAN said, "Who else was in the fucking house on the floor was there for about 5, 10
25 minutes. I guess when they got shot they passed out, but when they woke up they runnin' though the
26 house. So, I guess the other Mexican come back and get the Mexican that get shot." UM383 said,

1 "Yeah." P.DEAN continued, "but took AJ keys and his coat cause AJ left his shit, dropped his shit
2 when, when he left." UM383 said, "So now he got. He come there... that's easy you know." P.DEAN
3 continued [while UM383 continued to make active listening comments intermittently], "Ok, so. So
4 whoever went to the hospital. I guess whoever he popped they go to the hospital. So, I guess at the
5 hospital, I guess they tell 'em what happened. So on my way back to R Street, cause I already left
6 once. When I go back to check again, the police have it surrounded and everything, right. Now they,
7 they see me come up the street. I try to turn off. They jack me. Boom. Where did you come from?
8 Shit, my daddies. Where you goin'? Shit, [UI]. Have you been on R Street? Nah, I ain't be there.
9 What the fuck! Shit! [UI] That's a mailing address where my uncle live there. Yeah, like well there
10 been a shooting near there, [UI] I'm like well I don't know nothin' about it or whatever [UI]. They're
11 like yeah whatever, whatever P-dub. So they let me go. So soon as they let me go, I call AJ. I'm
12 like, eh man, now they raid R Street right now. Nigga, what the fuck! Where you at? Whatcha
13 doing? He was like I'm headed, I'm going up H right now. I'm fittin' to go, something he was fittin'
14 to go do, right, but as hes saying that he said damn I think they gettin' on me right now, they getting
15 on me. I said who. He said the law. I said well nigga you better get low then nigga if they gettin' on
16 you nigga 'cause they just let me go [UI]. He was like oh and he hung up. And after that, nigga, I
17 tried to call back 5, 10 minutes later, nigga, and no answer. [UI]" UM383 said, "[UI] on Panama and
18 stuff like east Bakersfield..." P.DEAN said, "H... H, H and Planz." UM383 said, "H and Planz, you
19 right. That's were it happened at." P.DEAN said, "Yeah, he tried to jump out right there I guess."
20 UM383 said, "But, but with pistol? Jump out with gun?" P.DEAN said, "I don't know. They [UI]..."
21 UM383 said, "[UI]." DEAN said, "Cause they, they already, probably got that he armed and
22 dangerous and he's been shooting already..." UM383 said, "[UI]." P.DEAN said, "and I guess dude
23 at the hospital probably told them that them mother fuckas shooting, so any time. The mother fuckas
24 [UI]..." UM383 said, "But how they figure it was AJ because what he leave on his keys?" P.DEAN
25 said, "His keys and his coat." P.DEAN said, "What that mean? They aren't sayin' his name on it."
26 P.DEAN said, "The Mexican took it with 'em. The Mexican that got shot... " UM383 said, "Ok,

1 understand that." P.DEAN said, "Took the shit. So I guess they get to the hospital they tell who he
2 did business with or who shit they see is." UM383 said, "Oh, they know AJ?" P.DEAN said, "[UI]."
3 UM383 said, "I'm talking about the people that did the move, yeah." P.DEAN said, "They had to
4 know him, my nigga..." UM383 said, "They had to know him, yeah." P.DEAN said, "[UI] 50, 60
5 racks and do a move if they don't know a nigga." UM383 said, "Yeah, yeah, yeah, yeah." P.DEAN
6 said, "You feel me." UM383 said, "That was gonna end up, that was gonna end up in, in murder
7 anyways. [UI] that was supposed to go [UI]." P.DEAN said, "Because I said AJ[UI]." UM383 said
8 [while UM383 continued to make active listening comments intermittently], "I seen that to [UI]."
9 P.DEAN said, "At the gas station. At the gas station, I said what AJ, I said what if you all did would
10 have robbed them and got away. You were gonna tell me that you used my spot to rob a nigga, they
11 come back and kill me." UM383 said, "[UI] come back and kill AJ if they know where he at. That's
12 crazy man. Me and [UI], man, we were just talkin' man. That hurt my heart, man, though." P.DEAN
13 said, "It hurt. [UI]" UM383 said, "It hurt. [UI]" UM383 said, "[UI]." P.DEAN said, "[UI] I just told
14 Erin (ERIN DEAN) last Sunday." UM383 said, "[UI] I just said, I just said he not stupid, so I know
15 he didn't get out with no gun in his hands, cause I know he not stupid like that." P.DEAN said, "Last
16 Sunday, when I went to visit Erin (E.D.) I told him." UM383 said, "Yeah." P.DEAN said, "AJ gonna
17 be dead before Christmas [UI]." UM383 said [while P.DEAN continued to make active listening
18 comments intermittently], "But you know, but you know what Dub I could see it in his eyes back
19 when I was with you. I could see it in his eye cause [UI] I just prayed for him [UI] and I did. You
20 know I pictured him [UI]. I said AJ why you quit... remember I said why you quit your job man...
21 cause I could see it on him. He was just like lost. [UI]" P.DEAN said, "Eh, he was doing too much.
22 He was doin too much." UM383 said, "[UI] Tryin' to get rich. Trying to get rich. Tryin' to get rich
23 man." P.DEAN said, "Pray for a nigga [UI]." UM383 said, "Man, alright [UI]..." P.DEAN said,
24 "[UI] police want to come question me. They know that. They know..." UM383 said, "I'm in church
25 right now, man,[UI] when I get out." P.DEAN said, "Well I was with, I was with you last night at
26 Brundage. I was with you." UM383 said, "Don't worry about nothin'. You were never with me."

1 P.DEAN said, "I was with you." UM383 said, "No I promise you wasn't cause I don't know where
2 you was at. [UI]" P.DEAN said, "Whatchu mean you can't say I was with you." UM383 said, "Nu,
3 uh, cause I don't know where you was at [UI]" DEAN said, "No, no, no, me, you, faith, and the kids
4 was havin' dinner, you know what I'm sayin, I'm a cousin from out of town and then [UI]" UM383
5 said, "[UI] alright, alright."

6 373. I believe the call detailed above further confirms that P.DEAN met with CRAWFORD
7 at the AM/PM as observed by surveillance. I believe the call detailed above shows P.DEAN has
8 many details about what happened at 710 R Street.

9 374. Based on the above, I believe there is probable cause to search both of P.DEAN's
10 suspected residences for evidence of this crime, which would provide evidence of his membership of
11 the WSC. Additionally, during the wiretap investigation, several communications were intercepted
12 indicative of P.DEAN's drug trafficking and firearms activities. For example, on November 3, 2017,
13 DEAN spoke with UM412 during session 1153 during which P.DEAN asked UM412 if he wanted
14 white or black, which I believe based on my training and experience is code for cocaine (white) and
15 heroin (black). This intercepted conversation also suggested that UM412 owes P.DEAN a drug debt.
16 Also on November 3, 2017 in session 1314, P.DEAN spoke with UM470 and asked if he wanted
17 white or black. UM470 clarified he wanted black, which I believe to be heroin. Again on November
18 3, 2017, P.DEAN spoke with UF333 in session 1336 about how he was trying to "get things out of
19 the car." I know based on my training and experience investigating gangs that gang members use
20 coded language, such as "things", "flap", "slap", and "burner" to refer to firearms.

21 375. DEAN continued to be involved with drug trafficking during the wiretap investigation.
22 On November 16, 2017, at 1411 hours, an unknown male called DEAN, using TT9. During the call,
23 the UM412 asked if DEAN is okay with meeting up with him to purchase a "rock" for "5", or if
24 would DEAN want to wait until UM412's dad came home to give him more money. DEAN says he
25 was in the alley at New Stine and Stockdale. Based on my training and experience working drug
26 related investigations, I am aware a "rock" is a term used to describe cocaine base. This call is
27
28

1 evidence that DEAN continues to deal in controlled substances. As set forth above, I believe evidence
2 of DEAN's drug trafficking will be located at his residence.

3 376. Based on the above incident and evidence of P. DEAN's criminal activity, there is
4 probable cause to search P.DEAN's Residences for violations of Title 21, United States Code,
5 Section 846, and 841(a)(1), conspiracy to distribute, and possession with intent to distribute cocaine
6 and heroin, and for violations of 18 U.S.C. 1962(c),(d) (Racketeer Influenced and Corrupt
7 Organizations/Conspiracy) including indicia of P. DEAN's membership and participation in the
8 WSC, as well as evidence of his agreement to violate section 1962(c) in violation of section 1962(d),
9 and his participation in the conduct of the WSC's affairs through a pattern of racketeering activity in
10 violation of section 1962(c).

11 377. The following day, on November 5, 2017, 1658 hours, a call was intercepted between
12 TT15, used by Ladaireus JONES, and J.K., user of 661-558-7028. During the call, the below
13 conversation occurred:

14 J.K.: Just got back home cuz.

15 JONES: Oh yeah, [UI] that's crazy.

16 J.K.: I forgot about you, cuz.

17 JONES: Huh?

18 J.K.: Said, I forgot about you, cuz.

19 JONES: Yeah.

20 J.K.: Your wallet was in my car last night.

21 JONES: Huh?

22 J.K.: I said your wallet was in my car last night.

23 JONES: I know, that nigga, uh, my ah, I talked to that nigga AJ last night.

24 J.K.: Yeah, I was in the car with him still, I told him to tell you.

25 JONES: Oh yeah.

26 J.K.: [UI] big bro.

1 JONES: You good though?

2 J.K.: Man, cuz, nigga [UI] been fucked up all day, bro.

3 JONES: Huh?

4 J.K.: Said, I been feeling fucked up all day nigga.

5 JONES: On me, nigga. I just been drinking loc.

6 J.K.: Know, I was with that nigga last night, bro.

7 JONES: On me.

8 J.K.: My cuz was like in the car, like, he feel me like, [OV], I took cuz home, nigga, and like,
9 at 10:36 they said cuz was dead at 11:00.

10 378. Based on this portion of the conversation, I believe CRAWFORD was being driven by
11 J.K. and dropped off by J.K. around 2236 hours, just prior to the officer involved shooting of
12 CRAWFORD.

13 JONES: That's crazy, bro.

14 J.K.: Yeah, bro.

15 JONES: [UI] I just talked to cuz. [UI] meet us back there at Vern house.

16 J.K.: Yeah, to go see, like what the fuck was going on.

17 JONES: Yeah.

18 J.K.: Damn, bro.

19 JONES: It's a hella [UI], bro.

20 J.K.: 12 know what the fuck they was doing, though.

21 JONES: Yeah. I knew, when they, when they tell me the police it was, I was okay, yeah.

22 J.K.: Which one was it?

23 JONES: Cra, uh, Krocker.

24 J.K.: Kro, who?

25 JONES: Krocker.

26 J.K.: Krocker?

27

28

1 JONES: Yeah

2 J.K.: Kroecker.

3 JONES: Kroecker, yeah.

4 J.K.: He, he wasn't the one that busted was he?

5 JONES: They got the name, the got him though, at least. [OV]

6 J.K.: No, Kroecker, Kroecker, Kroecker's an investigator.

7 JONES: Uh.

8 J.K.: Kroecker's an investigator, bro.

9 JONES: Oh yeah, well they must of read it wrong then.

10 J.K.: Yeah ,they say Montgomery bitch house is in the mix.

11 JONES: Yeah

12 J.K.: Yeah. You know who Montgomery is, right?

13 JONES: Yeah. He on the, he on my last thing.

14 J.K.: Yeah, the white boy, on God. Bald head white boy with the fuckin thick ass mustache,
15 Hitler mustache.

16 379. During the above portion of the conversation I believe J.K. and JONES were
17 discussing the officers they believed who were involved in the Officer involved shooting of
18 CRAWFORD. The conversation continued:

19 J.K.: My girl car got fucked up last night, nigga.

20 JONES: Yeah, they telling me like we all jump together, right.

21 J.K.: You said what?

22 JONES : Yeah I was just over there all right when your car got hit.

23 J.K.: Yeah.

24 JONES: I left it over there, I told him look I was going to get dressed you know, like I just
25 left, and came back, they like bro hella shit just happened bro while you just left [UI]. They say that
26 Jerm car got him like, [UI] like nigga, hella back out.

27

28

1 J.K. said: [UI] shit, bro.

2 JONES: Yeah, I'm like, that's cray.

3 J.K.: Nigga I was high nigga on God, bro. But, hey, everything happen for a reason, nigga.

4 JONES: On me.

5 J.K.: If the car didn't get hit, then I would have been in the car with you little nigga.

6 JONES: Yeah.

7 J.K.: Like on God, bro. Like, that's the only reason I want home, cuz.

8 JONES: That shit crazy.

9 380. I am aware from speaking with other Agents involved in the investigation that J.K.'s
10 girlfriend's car was hit by another subject's car during a minor collision. Because of the collision,
11 J.K. left. Based on the statements made by J.K., J.K. believed that if the car would not have been
12 involved in the collision, he would have been present with CRAWFORD when CRAWFORD was
13 shot. The conversation continued:

14 J.K.: That nigga Rag on me, huh, Coke still over there?

15 JONES: Huh?

16 J.K.: That nigga Rag was still over there when you went back.

17 JONES: Well, I, I, I never gone in the yard, I was across the street, like in front of Vern house,
18 [UI].

19 J.K.: Oh.

20 JONES: [UI].

21 J.K.: That shit me high bro.

22 JONES: Yeah, that shit fuck me up bro. 'Cause like I with him all day yesterday, from the
23 morning and all the way into night though.

24 381. Based on this statement by JONES, I believe JONES was with CRAWFORD during
25 the attempted robbery and shooting. The conversation continued.

26 J.K.: On God nigga, I was with you all, nigga.

1 JONES: Yeah, I'm like, nigga we had all the nigga at the Marketplace nigga, like hella [UI],
2 like. I'm like that shit cray.

3

4 JONES: I even got (UI) I gave it to that nigga yesterday, and then they can put it up.

5 J.K.: Jizzle?

6 JONES: Yeah.

7 J.K.: I know where he put it at.

8 JONES: Yeah.

9 J.K.: On V and 8th somewhere

10 JONES: Oh yeah, 'cause, I gave cuz flap yesterday, like.

11 J.K.: You know, you know where he will put it over there.

12 JONES: Nah, he just like, cuz just, cuz just, I was in the car cousin went in the house, like
13 [UI], that's where we had the weed and shit. This is before we leave with you.

14 Based on this portion of the conversation, I believe that JONES provided CRAWFORD the
15 firearm CRAWFORD used in the attempted robbery and shooting. Following the shooting, the
16 conversation leads me to believe that sometime after the shooting, JONES and CRAWFORD took
17 the firearm to a location on 8th and V Street where they left the firearm and marijuana. It should be
18 noted that on 11/05/2017, during the execution of a state search warrant, BPD officers located
19 approximately 306 grams of marijuana from CRAWFORD's residence located at 320 4th Street in
20 Bakersfield. I believe this same marijuana may have been subsequently transported to
21 CRAWFORD's residence after being temporarily placed at 8th and V Street. Per the conversation
22 above, I believe J.K. was aware that CRAWFORD stored the weapon at 8th and V because J.K. was
23 with CRAWFORD after the shooting. .. When JONES said, “ “Nah, he just like, cuz just, cuz just,
24 I was in the car cousin went in the house, like [UI], that's where we had the weed and shit. This is
25 before we leave with you”, I believe that J.K. was not only with CRAWFORD but was also with
26 JONES after the shooting occurred.

1 382.

2 J.K.: Yeah.

3 JONES: Alright then. I thought it was one that, I thought it was the one he had on him.

4 J.K.: Huh?

5 JONES: I thought it was the one, the slap they said they found on him.

6 J.K.: Nah. I think they went and bought one.

7 JONES: Yeah. They just telling nigga.

8 J.K.: That shit crazy, though.

9 383. Based on the above intercepted calls and surveillance observations, I believe there is
10 probable cause to search JONES's residences at 4812 Summertree Lane, Apt A, and, 720 Terrace
11 Way #17, Bakersfield, CA, for evidence of CRAWFORD's and CRUZ's violation of 18 U.S.C. §
12 924(c) (use of a firearm during a drug trafficking crime) and JONES's involvement in that crime.
13 Finally, based on the above calls, as well as the evidence set forth in section V(N) below regarding
14 JONES's unlawful possession of a firearm, and the reasons set forth in the section titled, "Evidence to
15 be Recovered at Subject Locations," there is also probable cause to search JONES' residences for
16 violations of 18 U.S.C. 1962(c)(d) (Racketeer Influenced and Corrupt Organizations) including
17 indicia of JONES' membership and participation in the WSC, as well as evidence of his agreement to
18 violate section 1962(c) in violation of section 1962(d), and his participation in the conduct of the
19 WSC's affairs through a pattern of racketeering activity in violation of section 1962(d).

20 **N. October 25, 2017 Seizure of JONES and C.S.'s Firearms (Probable Cause to Arrest**
21 **Ladaireus JONES; Probable Cause to search JONES's Residence)**

22 384. On October 25, 2017, at 1646 hours Agents intercepted an incoming call to
23 CRAWFORD, using TT1, from C.S., using telephone number 661-772-3096²⁵ (call 5153 on TT1).
24 During the call the following conversation took place:

25
26 ²⁵ While conducting surveillance on C.S., Agents placed a ruse call to telephone number 661-772-
27 3096. C.S. was observed as he placed the phone to his ear and had brief conversation with the Agent
28 who made the call.

1 C.S.: Eh.

2 CRAWFORD : Hello.

3 C.S.: Eh, text me Kejiuh's number.

4 CRAWFORD: What Kejiuh?

5 C.S.: [SHIVER states woman's full name; initials are L.C.]

6 CRAWFORD: I ain't got her number, matter of fact, on dub, I got her snapchat.

7 C.S.: Eh, could you hit her, tell, tell her, text her and tell her get out this car and.... nah, nah,
8 tell her to get out the car and tell, say, tell her, say she, that she gotta use the bathroom and to walk
9 toward Weinerschnitzel with the backpack.

10 CRAWFORD: What you say?

11 C.S.: Shit, um, we got in a car accident and it's hella 12's.

12 385. Based on your Affiant's training, experience, and knowledge of this investigation,
13 your Affiant believes C.S. was trying to have CRAWFORD contact L.C. and have her walk away
14 from a traffic collision with a backpack. C.S. explained that they were in a car accident near
15 Weinerschnitzel and there were "12's," a slang term for law enforcement.

16 386. Based on the call, Agents believed C.S. was concerned about the contents of the
17 backpack. Agents were aware that both CRAWFORD and C.S. are WSC gang members and often in
18 the possession of firearms. The investigation has also revealed WSC gang members regularly carry
19 firearms. Agents were also aware that WSC gang members also deal in controlled substances. Your
20 Affiant is aware based on his training and experience that contraband, including firearms and
21 controlled substances are often concealed by gang members in backpacks. Based on this, SA
22 Mancebo contacted Bakersfield PD and discovered there was traffic collision on Brundage and
23 Hughes, which is near a Weinerschnitzel. Based on the factors mentioned above, SA Mancebo
24 instructed BPD to respond to the scene to check the backpack before it could be removed from the
25 traffic accident scene.

26 387. Following the initial conversation between CRAWFORD and C.S., at 1649 hours,
27
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1 CRAWFORD sent a text message to C.S. that read, "She there", call 5155 on TT1. C.S. responded a
2 few minutes later, "Ight".

3 388. BPD Officer Poteete and Garcia responded to the traffic accident located on Brundage
4 and Hughes. When they arrived, they contacted G.B, C.S., and L.C. Officer Haskins observed two
5 black males in the area of the accident. Officer Haskins described one as having "dreads" and the
6 other had a tattoo on his face. I am aware JONES has a tattoo on his face. Officer Haskins viewed a
7 photo of JONES and stated he believed it was the same subject with a tattoo on his face near the
8 accident scene on October 25, 2017. L.C. had a gold backpack with her. Officers recovered the
9 backpack and conducted a search of the backpack, after having been given consent. During the
10 search of the backpack, Officer Poteete discovered a stolen Smith and Wesson .38 special revolver
11 and a stolen Smith & Wesson SD40VE in the backpack.

12 389. Following the search of the backpack, at 1803 hours, agents intercepted an outgoing
13 call from CRAWFORD, using TT1, to C.S., using telephone number 661-772-3096, call 5177 on
14 TT1. During the call the following conversation took place:

15 C.S.: Yeah.

16 CRAWFORD: What happened, ya'll didn't get flap.

17 C.S.: Nah.

18 CRAWFORD: Ya'll didn't get it?

19 C.S.: On dub, no.

20 CRAWFORD: The boys got it?

21 C.S.: Yeah.

22 CRAWFORD: Did they?

23 C.S.: Nah nigga, they still over stuck where they at. Me and LD shook the scene. There's too
24 many laws.

25 CRAWFORD: They told me gang task pulled up

26 C.S.: Yeah.

1 CRAWFORD: We fittin' to go look at it right now.

2 C.S.: Alright.

3 CRAWFORD: Eh, why you all bounce out and leave the flaps though?

4 C.S.: Shit nigga, we didn't want them to start questioning us and shit.

5 CRAWFORD: So why would ya'll leave em with the females?

6 C.S.: Shit. Man.

7 CRAWFORD: What?

8 C.S.: Go check the scene out, man.

9 390. Based on your Affiant's training and experience and knowledge of this investigation,
10 your Affiant believes CRAWFORD called C.S. and asked if they were able to retrieve the "flaps," a
11 slang term for guns. C.S. said they weren't and that the "boys", a slang term to describe law
12 enforcement, recovered them. C.S. explained that he and "LD" fled the scene before law
13 enforcement got there. Your Affiant knows that LD is the nickname for WSC gang member Ladarius
14 JONES. Based on the context of the conversation, I believe JONES was present with C.S. at the
15 traffic collision and was present with C.S. when the backpack was handed to [REDACTED].
16 Additionally, when L.C. was questioned by BPD, she stated she knew one of the subjects who was
17 present and fled the scene as "LD"(JONES).

18 391. At 1815 hours, Agents intercepted an incoming call to CRAWFORD, using TT1, from
19 C.S., using telephone number 661-772-3096, call 5179 on TT1. During the call the following
20 conversation took place:

21 C.S.: Its bad huh.

22 CRAWFORD then told C.S. that it was "Lieland's" sister.

23 C.S. explained to CRAWFORD that "Lil Poodie" just called him and said they got the car
24 hemmed up and all this "shit and got ole baby on the curb."

25 CRAWFORD: Why would niggas leave the flap though, that's the serious part. That defeat the
26 purpose of bouncing out the car.

1 C.S.: See how the situation was, was like it wasn't suppose to go how it went...The bitch told
2 us to walk off nigga because she didn't want to her momma to know we in the car, so we pushed off.

3 CRAWFORD: So ya'll just left the flaps?

4 C.S.: Nigga, we bounced out the bitch Kajuah like yeah, whoop, whoop, whoop, shit give em
5 to me.

6 C.S. then talked about the backpack and he said "we slid em."

7 CRAWFORD: That's on God they saying its gang task.

8 C.S.: Yeah. I think it's bad...Lil Poodie said something about they lookin for us or some shit.

9 CRAWFORD: Leiland's sister is going to tell on the hood.

10 C.S.: Fuck!

11 CRAWFORD: On the Westside.

12 CRAWFORD then asked C.S. if he lost the "good one or the garbage one."

13 C.S.: Nigga both! You said the good one or the garbage one, Nigga the only one I ever had!
14 Whatchu mean?

15 CRAWFORD: That's what I , so LD..[OV]

16 C.S.: No we both had flaps.

17 CRAWFORD: And y'll both left both of 'em, Cory when do you ever leave your flap?

18 C.S. then explained that he left because the "law" was coming.

19 CRAWFORD then told C.S. he should have run with the guns.

20 392. Based on your Affiant's training, experience, and knowledge of this investigation,
21 your Affiant believes CRAWFORD was informing C.S. that CRAWFORD heard that "Leiland's"
22 sister was going to "tell." Your Affiant believes that CRAWFORD was telling C.S. that he thought
23 "Leiland's" sister was going to tell law enforcement that C.S. left the traffic collision. C.S. said that
24 L.C. told him to run and offered to take the guns for him. CRAWFORD asked if it was the "good"
25 one or the "garbage" one. Your Affiant believes that CRAWFORD was either referring to the quality
26 of the two guns or that one gun had been used in a crime, being the "garbage" one, and one had not,
27
28

1 being the “good” one. C.S. indicated it was both guns that were recovered. C.S. then indicted it was
2 the only gun he ever had, indicating to your Affiant that C.S. claimed ownership of one of the guns.
3 When C.S. said, “no we both had flaps”, I believe he is clarifying to CRAWFORD that JONES and
4 himself **both** possessed firearms.

5 393. Based on the facts set forth above, your Affiant believes that WSC gang members
6 JONES and C.S. were involved in a vehicle collision. C.S. and JONES were in possession of stolen
7 firearms at the time of the collision. The firearms were placed or stored in a backpack. Following the
8 collision, C.S. contacted CRAWFORD and asked for CRAWFORD to contact L.C. so she could
9 respond to collect the backpack to remove the backpack from the scene before law enforcement
10 discovered the firearms. L.C. responded to the scene. C.S. provided the backpack to L.C. Before
11 L.C. could leave the scene with the backpack, agents sent Officer Poteete to the scene to try and
12 locate the backpack. Officer Poteete contacted L.C. while she was in possession of the backpack.
13 She consented to a search of the backpack. Officers located two stolen firearms inside the backpack.

14 394. Additionally, your Affiant is aware JONES is a convicted felon and prohibited from
15 possessing firearms. Your Affiant reviewed criminal history records and confirmed JONES was
16 convicted of 25850 (C)(3) Criminal Street Gang member carrying a firearm, a felony punishable by
17 more than a year in prison.

18 395. On 11/13/2017 Alcohol, Tobacco, Firearms and Explosives Special Agent Brad
19 Dickey who has specialized training in the manufacture, origin, and identification of firearms
20 examined photographs of the the Smith & Wesson, model SD40 VE, 40 caliber semi-automatic with
21 serial number FXN1434, and the Smith & Wesson model .38 special revolver. He stated that both
22 guns were not manufactured in the state of California, and therefore, traveled in and affected
23 interstate commerce.

24 396. Based on the above evidence, there is probable cause to arrest JONES for the unlawful
25 possession of firearms, in Violation of Title 18, United States Code, Section 922(g)(1). Furthermore,
26 I believe evidence of this violation will be present at 4812 Summertree Lane #A, Bakersfield, CA,
27
28

1 and 710 Terrace Way, Apt. 17, Bakersfield, CA, the residences for JONES, such as ammunition for
2 the weapon. Based on the evidence in this section, as well as the evidence about JONES set forth in
3 the section regarding CRAWFORD's robbery of the marijuana dealer (Section V(M) above), there
4 continues to be probable cause to search JONES's residence for violations 18 U.S.C. 1962(c)(d)
5 (Racketeer Influenced and Corrupt Organizations/Conspiracy) including indicia of JONES's
6 membership and participation in the WSC, as well as evidence of his agreement to violate section
7 1962(c), his own participation in violent crimes on behalf of the WSC, and his participation in the
8 conduct of the WSC's affairs through a pattern of racketeering activity.

9 **O. November 3, 2017 T.THOMAS and CRAWFORD sold Methamphetamine to CRI#1
10 and CRI#6 (Probable Cause for the Arrest of T. THOMAS and the search of his
11 residence.)**

12 397. On November 3, 2017, investigators from the FBI and CalDOJ conducted a controlled
13 purchase operation from CRAWFORD and T.THOMAS using CRI#1 and CRI#6²⁶.

14 398. At 1445 hours, your Affiant and other law enforcement agents, met with CRI#1 and
15 CRI#6 at a predetermined meeting location. During this meeting, agents planned to have CRI#1 call
16 CRAWFORD and arrange an introduction between CRI#6 and CRAWFORD for the purchase of two
17 ounces of crystal methamphetamine. During this meeting, agents searched CRI#1 and CRI#6 as well
18 as their vehicles. No monies or drugs were located. CRI#6 was provided documented currency to
19 utilize for the controlled purchase of the two ounces planned to be purchased. CRI#6 was also
20 provided a remote listening device as well as an audio and video recorder to be utilized during this
21 controlled purchase and meeting. At the direction and supervision of agents, CRI#1 called
22 CRAWFORD to initiate this meeting.

23 399. At 1501 hours, agents intercepted an incoming call, call number 6684, on TT#1, being
24 used by CRAWFORD, from (661) 558-9019, being used by CRI#1. During this call, CRI#1 said

25 ²⁶ Confidential Reliable Informant Six (CRI#6): CRI#6 has worked with multiple agencies over a
26 several years and has provided reliable information. CRI#6 has one misdemeanor conviction. CRI#6
27 has worked with your Affiant previously on another investigation and was both reliable and credible.
28 CRI#6 works for monetary compensation.

1 he/she was in Oildale with CRI#6. CRAWFORD asked if he wanted some pills again (referring to a
2 previous controlled drug buy). CRI#1 said CRI#6 wanted some methamphetamine then asked CRI#6
3 in the background while on speakerphone, how much CRI#6 wanted to spend on methamphetamine.
4 CRI#1 then handed the phone to CRI#6 who introduced him/herself and said he/she needed a “QP”
5 (quarter pound/4 ounces). CRAWFORD said he had it with him and will call CRI#6 right back.
6 CRI#6 agreed and told CRAWFORD to let him/her know how much it will cost.

7 400. At 1503 hours, agents intercepted an incoming call, call number 6688, on TT#1, being
8 used by CRAWFORD, from (661) 558-9019, being used by CRI#1. During this call, CRAWFORD
9 told CRI#1 to put CRI#6 on the phone. CRAWFORD then told CRI#6 that he has (the
10 methamphetamine) and it is “nice.” CRAWFORD further explained that it is not “shake” or
11 “crumbs” and described it as “hunks and chunks”²⁷. CRI#6 agreed and asked CRAWFORD what the
12 price was. CRAWFORD indicated \$1,100. CRAWFORD told CRI#6 that he has some lower grade
13 methamphetamine too. CRI#6 then explained to CRAWFORD that the going price for
14 methamphetamine is \$275-\$230 per “zip” (ounce) and expressed his disapproval. CRAWFORD said
15 it was because he was trying to sell him some “gas at 11” (high quality drug for \$1,100) and
16 explained that he still has the lower quality which is still good. CRI#6 said that the lower grade
17 would be okay and told CRAWFORD to meet. The group then agreed to meet at the Circle K store
18 near Oak Street and California Ave.

19 401. At 15:09 hours, CRAWFORD using TT#1 made an outgoing call to K.PIERSON at
20 telephone number 661-526-8024 (Call 6689)²⁸. During the conversation, CRAWFORD said, “it’s an
21 emergency, we need you come to your spot.” K.PIERSON replied by informing CRAWFORD she

22
23 ²⁷ Based on my training and experience investigating drugs, I know different terms are often used to
24 describe the quality of methamphetamine. I believe when CRAWFORD said, “shake” and “crumbs”
25 he was referring to lower quality meth. I believe when CRAWFORD said, “hunks and chunks” he
26 was referring to higher quality meth.

27 ²⁸ Your Affiant knows K.PIERSON to be the user of 661-524-8024 due to the phone being subscribed
28 to Valerie PIERSON (K. PIERSON’s mother) as reflected in the open source database “CLEAR”.
Additionally, in an intercepted text message on TT#4 (WHATLEY’s phone) the user of 661-524-
8024 is referred to as “Kristi.” I also know based on my experience with the current investigation that
K.PIERSON is T.THOMAS’s girlfriend.

1 was at the nail salon. At 15:11 hours, CRAWFORD using TT#1 received an incoming call from
2 CRI#1. During the conversation, CRAWFORD told CRI#1 he wanted to use CRI#1's residence to
3 divide up the methamphetamine. CRI#1 indicated to CRAWFORD that was not an option.

4 402. At 15:27 hours, T.THOMAS using TT#1 made an outgoing call to K.PIERSON at
5 telephone number 661-526-8024. Your Affiant knows the voice of T.THOMAS based on listening to
6 numerous wiretap interceptions of T.THOMAS. During the conversation, T.THOMAS asked
7 K.PIERSON, "is the house key on the car key?" K.PIERSON said, "is the what?" T.THOMAS said,
8 "the apartment key, to get in." K.PIERSON said, "I have 'em." T.THOMAS said, "alright." At the
9 end of the call, T.THOMAS could be heard saying, "damn, I need to get in this fuckin' apartment."

10 403. At 15:33 hours, CRAWFORD at TT#1 received an incoming call from CRI#1. During
11 the conversation, CRI#1 told CRAWFORD that he/she was at Circle K and did not want anyone at
12 his/her house. Later in the conversation, CRAWFORD told CRI#1 to tell CRI#6 that if he/she had
13 \$1500.00 that CRAWFORD would give him/her a "good ass deal, I give him an ounce and a half"
14 and that he had to "weigh this shit out." Later in the conversation, CRAWFORD clarified the
15 quantity and the price by saying, "I meant a qp and a half, I'm trippin." CRAWFORD then told
16 CRI#6 that he was pulling up right now. I know that "qp" is a term used by drug traffickers to
17 describe a quarter pound.

18 404. At 1535 hours, Officer Anderson saw a white Ford dually pickup truck enter the gas
19 station and drive past CRI#6 and CRI#1. SA Pacheco saw that CRAWFORD was seated in the right
20 front seat as T.THOMAS was driving. CRI#1 exited CRI#6's vehicle, met with T.THOMAS and
21 CRAWFORD at the open driver's door. While reviewing a video, taken by SA Pacheco, Officer
22 Anderson saw CRAWFORD hand CRI#1 a package, which CRI#1 placed in his right front pocket
23 before he/she returned to CRI#6's vehicle. The Ford then left the gas station as several agents
24 followed. Officer Anderson heard CRI#1 tell CRI#6 that he/she had the drugs and CRAWFORD
25 wanted him/her to follow the Ford to an unknown location. CRI#6 instantly told CRI#1 that was
26 unacceptable and that they would complete the drug deal at that the Circle K as planned. CRI#6 then
27

1 exited the vehicle as he/she called your Affiant to provide an update of the situation.

2 405. At 1537 hours, CRAWFORD using TT#1 called CRI#1. During the conversation,
3 CRAWFORD asked CRI#1 where he/she was located. CRI#1 told CRAWFORD he/she was in
4 CRI#6's car. I believe based on my review of these calls that CRAWFORD was expecting CRI#1
5 and CRI#6 to follow CRAWFORD. I believe based on my knowledge of drug trafficking that
6 CRAWFORD provided CRI#1 the methamphetamine to hold and wanted CRI#1 to follow
7 CRAWFORD and T.THOMAS. I believe CRAWFORD wanted CRI#1 to hold the
8 methamphetamine while driving as to avoid himself being pulled over. Also during this call,
9 T.THOMAS's voice could be heard in the background.

10 406. At 1543 hours, agents intercepted an incoming call on TT#1, being used by
11 CRAWFORD, from (661) 558-9019, CRI#1's telephone, being used by CRI#6. During this call,
12 CRI#6 asked CRAWFORD how much methamphetamine was in the bag (that CRI#6 gave to CRI#1).
13 CRAWFORD said it had 4 ounces and 20 grams. CRI#6 asked how much he wanted for the extra 20
14 grams. CRAWFORD said he wanted at least \$1,300 or \$1,400. CRI#6 was obviously upset as he/she
15 explained CRAWFORD's bad math to him. He/she explained that CRAWFORD was already
16 overcharging him/her at \$300-\$400 per ounce and then CRAWFORD wanted an additional \$400 for
17 the extra 20 grams (8 grams less than an ounce, nearly 2/3). CRAWFORD agreed and attempted to
18 justify his overpricing. CRAWFORD then tried to offer \$1,300 and CRI#6 rejected CRAWFORD's
19 offer by telling him he/she would only give \$1,150 for all of it. CRI#6 also told CRAWFORD that
20 he/she needed to remember that he/she would be passing through Bakersfield every ten days or so
21 and would want to continue purchasing drugs so CRAWFORD should not try to charge to high of a
22 price.

23 407. Agents followed CRAWFORD and T.THOMAS to the LA Mirage Motel, located at
24 525 Union Avenue, where CRAWFORD ran to an unknown room and quickly returned to the truck.
25 The truck left the motel and agents continued to follow.

26 408. At 1551 hours, CRAWFORD and T.THOMAS returned to the Circle K and parked
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1 next to CRI#6's vehicle as observed by physical surveillance.

2 409. Officer Anderson saw CRI#1 exit CRI#6's vehicle, approach the Ford pickup and
3 enter the right rear seat. Additionally, Officer Anderson saw that T.THOMAS was still driving and
4 CRAWFORD was still seated in the right front seat. T.THOMAS, CRAWFORD, and CRI#1
5 appeared to be manipulating an unknown object(s) below the line of sight of passerby. T.THOMAS
6 exited the pickup and went inside the store. A few moments later, T.THOMAS exited the store and
7 returned to his pickup. As T.THOMAS passed CRI#6's vehicle, CRI#6 told T.THOMAS to tell
8 CRAWFORD to hurry up because he still has places to go. T.THOMAS entered the pickup and
9 CRI#6 exited his vehicle and walked over to the open driver's window next to T.THOMAS. As
10 learned during a subsequent debrief (described below), T.THOMAS and CRAWFORD weighed and
11 packaged the methamphetamine while at the Circle K. CRI#6 then handed the money (\$1,100) to
12 T.THOMAS who then handed it over to CRAWFORD. In turn, CRAWFORD handed T.THOMAS
13 the packaged methamphetamine who then handed it to CRI#6. During this meeting, Officer
14 Anderson could hear (through the use of the body wire) CRI#6 introducing him/herself to both
15 CRAWFORD and T.THOMAS. CRAWFORD introduced himself as "AJ" and T.THOMAS
16 introduced himself as "Tapp". CRI#6 gave CRAWFORD his/her telephone number and told him to
17 call it so it would be in his phone. Officer Anderson saw CRI#6 look at his/her phone as I heard him
18 read off the number for TT#1 confirming it to be CRAWFORD's.

19 410. At 1601 hours, agents intercepted an outgoing call, on TT#1, being used by
20 CRAWFORD, to (575) 495-3496, being used by CRI#6. This call was not completed but was
21 directed by CRI#6 so the he/she could exchange phone numbers with CRAWFORD and contact him
22 directly for future drug deals.

23 411. Surveillance subsequently observed CRI#6 and CRI#1 returned to CRI#6's vehicle as
24 T.THOMAS and CRAWFORD drove away.

25 412. T.THOMAS and CRAWFORD were followed to 3030 Verde Street where agents
26 know K.PIERSON resides in apartment 19. After a few moments, CRAWFORD entered a black
27

1 2010 Dodge Avenger (CA L/P# 6LYW276). CRAWFORD left the apartment complex and drove to
2 multiple locations including his residence on 320 4th Street, 701 T Street (agents are aware this is the
3 residence of ALLEN) then to 500 Baker Street (Probation Department). Surveillance on
4 CRAWFORD was terminated at 1745 hours. A subsequent records check revealed the Dodge
5 Avenger bearing CA L/P# 6LYW276 is registered to Valerie PIERSON and Gary PIERSON
6 (PIERSON) at 1321 N Street, Bakersfield, CA.

7 413. SA Cantrell, SA Mancebo, Officer Anderson and Your Affiant followed CRI#6 and
8 CRI#1 to the undisclosed location to debrief the CRI's and collect the evidence. Your affiant
9 collected the remainder of the "buy money" and a zip-lock baggie containing approximately 122
10 grams of methamphetamine, as well as the body wire and audio/video recorder from CRI#6 and
11 CRI#1. Officer Anderson searched CRI#6 as your Affiant searched CRI#1. SA Mancebo searched
12 CRI#6's car. During this debrief, CRI#1 explained that CRAWFORD was trying to get CRI#6 and
13 CRI#1 to follow them to an unknown location to weigh and package the methamphetamine because
14 CRAWFORD did not have a scale with him. CRI#1 said that CRAWFORD gave him/her the zip-
15 lock baggie of meth to hold onto in order to "freeze" the deal while CRAWFORD retrieved a scale.
16 CRI#6 said when the two returned to the Circle K and he/she met with them at the driver's door,
17 CRAWFORD introduced himself as "AJ" and THOMAS introduced himself as "Tapp". At that time,
18 SA Mancebo showed CRI#6 a picture of THOMAS and CRI#6 positively identified T.THOMAS as
19 the driver of the Ford pickup and the person that helped CRAWFORD weigh and package the
20 methamphetamine for the drug deal. CRI#6 said he/she then exchanged phone numbers with
21 CRAWFORD and told him to expect another drug deal the following week. CRAWFORD agreed.
22 CRI#1 explained that although CRAWFORD was the "face" of the drug deal, that he/she believes the
23 drug deal was for T.THOMAS, because he/she knows that T.THOMAS has higher rank within the
24 gang than CRAWFORD.

25 414. I believe based on the evidence above, that there is additional probable cause for the
26 arrest of T.THOMAS for the violation of Title 21 U.S.C 841(a)(1) and the search of T.THOMAS's
27
28

1 residence.

2 **P. Myron DEWBERRY Gun Seizure (PC to Arrest DEWBERRY)**

3 415. During the wiretap investigation agents were intercepting telephone number 661-369-
4 3671 previously established to be used by WSC member D.W. On October 5, 2017, Agents
5 intercepted calls and conducted surveillance that led them to conclude that D.W. had recently
6 conducted a shooting. Agents established surveillance at a house in which they believed D.W. went
7 following the shooting.

8 416. At 1454 hours, a dark gray 2015 Chrysler 200 (California license plate 7JXP487,
9 registered to Myron Dewberry, 2921 Brookside Drive, Bakersfield, CA 93311) arrived and parked on
10 the street in front of BURNS's residence. Myron DEWBERRY (YOB: 1973), who TFO Anderson
11 recognized by his DMV photograph) walked to the front door carrying a black backpack and a small
12 black disposable plastic bag. DEWBERRY knocked on the door and entered once opened by D.W.
13 At 1540 hours, DEWBERRY exited the residence, returned to his car and drove away.

14 417. DEWBERRY was stopped by BPD SEU Officers. Officers observed the
15 aforementioned Chrysler 200 did not have a front license plate in violation of vehicle code 5200(a).
16 A traffic stop was conducted at Wilson Road and Larson Lane. During the vehicle stop, Officer
17 Poteete asked DEWBERRY, "Hey buddy you don't have anything illegal on you or weapons like a
18 large knife do you?" DEWBERRY responded by saying, "No I don't have a large knife on me."
19 Officer Poteet asked DEWBERRY, "Why do you say it like that?" DEWBERRY replied by saying,
20 "I have a pistol sir." Officer Poteete subsequently asked DEWBERRY if the pistol was on
21 DEWBERRY's person, to which DEWBERRY replied, "No sir. It's in the backpack in the back
22 seat." Officer Poteete asked if the gun was registered to DEWBERRY, to which DEWBERRY
23 replied, "No sir I bought it off the streets." Based on DEWBERRY's statements about the firearm as
24 well as a strong odor of marijuana emitting from the vehicle, Officer Vasquez subsequently searched
25 the vehicle.

26 418. While searching the vehicle, Officer Vasquez located the aforementioned Hi-Point
27
28

1 Firearms 9mm Lugar, S/N P1313252, located in a black backpack on the rear passenger seat; 8 live
2 Blazer 9mm lugar rounds of ammunition located inside the firearm; 7 separate baggies of marijuana
3 in different denominations in the aforementioned backpack; a box of sandwich baggies in the
4 backpack; two digital gram scales in backpack; a clear jar containing marijuana located inside the
5 black backpack; a black Samsung Galaxy S7 located in the center console of vehicle; and \$53.00 of
6 US Currency. As a result of this stop, DEWBERRY was arrested for various firearm charges and
7 sales of marijuana.

8 419. Upon arrest, Officer Poteete transported DEWBERRY to the Bakersfield Police
9 Department where he was interviewed by Detective Pair and Detective Gavin. Detective Pair and
10 Detective Gavin advised DEWBERRY of the Miranda Admonition to which he state he understood.
11 During the interview, DEWBERRY admitted to detectives that the firearm and marijuana was his.
12 DEWBERRY claimed the marijuana was in his vehicle for personal use. DEWBERRY also told the
13 detectives that he is a prior felon and knows he was not supposed to have the firearm. DEWBERRY
14 advised that he had given D.W. a haircut earlier that morning. DEWBERRY said that the firearm he
15 was arrested with was never inside 312 South Myrtle and that he left it in his vehicle while inside the
16 address. DEWBERRY said that no one else had possession of the handgun.

17 420. On October 22, 2017, at approximately 1440 hours, a call was intercepted over D.W.'s
18 TT#2 during session number 1521. D.W. made an outgoing telephone call to telephone number 661-
19 421-6337. I believe the user of 661-421-6337 during this call to be DEWBERRY because a search
20 of Facebook with telephone number 661-421-6337 resulted in the Facebook account for "Myron
21 Dewberry Jr.," which also displayed a picture of DEWBERRY. During the conversation,
22 DEWBERRY said "Hello?" D.W. said "Hey yo Tuck(?)" DEWBERRY said "Yeah." D.W. said
23 "Hey I got another one of them AR's and shit I just came across right now. Shit. Uh, you know
24 anybody that wants one?" DEWBERRY said "15? The same one?" D.W. said "No, uh, yeah. It's a
25 AR 15, 50 round. 5.56." DEWBERRY said "That right?" D.W. said "Yep." DEWBERRY said
26 "Alright, I'll check around." DEWBERRY said "Alright, check around for me." DEWBERRY said

1 "Alright, for sure." D.W. said "For sure." DEWBERRY said "Alright. DK?"

2 421. I believe based on my review of the above conversation that DEWBERRY continued
3 to possess firearms. When DEWBERRY said, "15? The same one?", I believe this to mean that
4 DEWBERRY has previously observed another AR-style rifle (assault rifle) that D.W. has had. D.W.
5 then confirmed by saying, "No, uh, yeah. It's a AR 15, 50 round. 5.56." DEWBERRY then said,
6 "D.W. said "Yep." DEWBERRY said "Alright, I'll check around." I believe DEWBERRY is telling
7 D.W. he would help find a buyer for the AR-style rifle.

8 422. On 11/13/2017 Alcohol, Tobacco, Firearms and Explosives Special Agent Brad
9 Dickey who has specialized training in the manufacture, origin, and identification of firearms
10 examined photographs of the HiPoint 9mm handgun possessed by DEWBERRY, with serial number
11 1313252. SA Dickey concluded that this firearm was not manufactured in the state of California, and
12 therefore, traveled in and affected interstate commerce.

13 423. I have received and reviewed DEWBERRY's certified conviction documents. Those
14 documents indicate that in 2004, DEWBERRY was convicted of California Penal Code HS 11359,
15 Possess for Sales Marijuana. This crime is punishable by a term of imprisonment exceeding one year.
16 Consequently, at the time of his possession for the aforementioned firearm and ammunition,
17 DEWBERRY was a convicted felon and consequently prohibited from possession firearms pursuant
18 to 18 U.S.C. § 922(g)(1). Based on the above, there is probable cause to believe that DEWBERRY
19 was in violation of Title 18, United States Code, Section 922(g)(1).

20 **Q. Larry THOMAS Wire Fraud Investigation and Unlawful Firearms Possession**
21 ***(Probable Cause to Search L.THOMAS's Residence)***

22 424. The FBI Bakersfield received information from an FBI Oklahoma City Division Lead
23 of a wire fraud scheme involving documented WSC member Larry THOMAS. An individual
24 hereinafter referred to as "K.L.," Year of Birth (YOB), 1934, was the victim in this case and appears
25 to have been defrauded of approximately \$719,000. Below is a synopsis from the FBI Oklahoma
26 City Division Lead:

1 425. K.L. told law enforcement that on March 7, 2017, K.L. received a phone call from
2 telephone number 403-383-3792. The caller claimed to be a grandson, G.L., and said he was riding
3 in an Uber that had been pulled over. The caller stated he had been arrested after police found drugs
4 in the Uber and determined the drugs to be the passenger's. K.L. promised not to disclose G.L.'s
5 troubles to G.L.'s parents, and the caller put his attorney on the phone. The attorney identified
6 himself as Terry Parker. Parker requested K.L. wire \$41,000 for G.L.'s legal defense.

7 426. K.L. told law enforcement that on March 7, 2017, K.L. wired \$41,300 from Tinker
8 Mutual Bank (TFCU), account number ending in 1615, to a Washington Mutual Bank (JP Morgan
9 Chase Bank) account, ending in 7812, belonging to Larry THOMAS. A copy of wire confirmation
10 receipts is attached in the main case file under the Oklahoma City Division Lead.

11 427. K.L. told law enforcement that on March 9, 2017, K.L. received a phone call from
12 telephone number 403-390-1121, from someone claiming to be her grandson and Parker. Parker told
13 K.L. someone had sued Uber and won a judgement. Parker wanted K.L. to join in the suit to regain
14 the legal fees her grandson had incurred. Parker wanted K.L. to wire \$500,000 to \$600,000 to Lima,
15 Peru to retain legal counsel for the lawsuit. K.L. withdrew a cashier's check for \$500,000 from
16 TFCU and deposited the check into an account at FNB Community Bank in Midwest City, OK. K.L.
17 then wired \$500,000 from her TFCU Community Bank account to Inversiones-Alonico E.I.R.L.,
18 Ave., Alfredo Mendiola 3755, Los Loines, Lima, Peru on March 10, 2017.

19 428. K.L. told law enforcement that on March 16, 2017, K.L. received a phone call from a
20 female name Diron (phonetic spelling) using the same phone number as Parker. Diron wanted K.L.
21 to wire \$100,000 to Diron's Chase Bank account as a retainer.

22 429. K.L. told law enforcement that on March 21, 2017, K.L. wired \$100,000 to a Chase
23 Bank account ending in 7812 belonging to Larry THOMAS.

24 430. K.L. told law enforcement that on March 29, 2017, K.L. received a phone call from
25 James Mathew using the same phone number as Parker. Mathew claimed to be a paralegal with
26 Parker. Mathew wanted K.L. to wire \$300,000 as a retainer for the lawsuit against Uber. K.L. went
27

1 to TFCU to cash out bonds, but TFCU loss prevention employees stopped K.L. from wiring the
2 money and convinced K.L. she had been scammed.

3 431. Law Enforcement obtained bank records for the JPMorgan Chase account ending
4 7812. The account was opened on February 15, 2017, by Larry Thomas, using an associated Social
5 Security Number and California driver's license. Law Enforcement located three deposits over
6 \$1,000. On March 07, 2017, a deposit from Think Federal Credit Union by K.L. was made for
7 \$41,300. On March 08, 2017, a deposit from Tinker Federal Credit Union by K.L. was made for
8 \$78,000. On March 21, 2017, a bank transfer by K.L. was made for \$100,000. Also in the records
9 were nine withdrawals between March 07, 2017, and March 23, 2017, for \$219,350. Law
10 enforcement obtained bank surveillance photos that depicted L. THOMAS withdrawing money from
11 the account in question on March 08, 2017, and March 23, 2017.

12 432. The remaining funds of L. THOMAS' JPMorgan Chase account ending 7812 were
13 transferred to another JPMorgan Chase account, ending 0587, on March 23, 2017. Records obtained
14 by Law Enforcement showed the JPMorgan Chase account ending 0587 was opened by L. THOMAS
15 on March 23, 2017, using an associated Social Security Number and California driver's license
16 number.

17 433. The FBI Bakersfield received information from the FBI Boston Division regarding a
18 similar scheme involving L. THOMAS. An individual hereinafter referred to as "R.G.," YOB 1937,
19 the victim in this case, was defrauded of approximately \$35,500. Below is a synopsis from the FBI
20 Boston Division:

21 434. R.G. told law enforcement that on April 31, 2017, R.G. received a phone call in which
22 the caller claimed to be R.G.'s child, G.G. G.G. claimed to have been involved in a fatality vehicle
23 collision. G.G. was arrested for the incident and also charged with leaving the scene of the collision.
24 G.G. said he needed \$6,000 for an appearance bond. R.G. later spoke with G.G.'s lawyer Eric
25 MATHEWS at phone number 604-366-6723. Eric MATHEWS requested the \$6,000 be paid in Home
26 Depot gift cards. R.G. purchased the gift cards and provided the gift card and pin numbers to Eric
27

1 Mathews via phone.

2 435. Eric Mathews later told R.G. that G.G. was going to court and R.G. needed to pay
3 \$64,000 to cover the collision, hospital bills, and to keep the incident off of G.G.'s record. R.G.
4 refused to pay \$64,000, but agreed to pay \$29,500. R.G. was provided information for L. THOMAS
5 including a Bank of America account number; routing number; home address of 612 El Sereno Drive,
6 Bakersfield, California; and phone number 661-421-2460. On April 04, 2017, R.G. wired \$29,500
7 from TD Bank, account number ending 2136, to a Bank of America account, ending in 6426,
8 belonging to Larry THOMAS. A copy of the wire confirmation receipt and copies of the Home Depot
9 gift cards are attached in the main case file.

10 436. Law Enforcement obtained records for Bank of America account, ending 6426. The
11 account was opened on March 07, 2017, by L. THOMAS using an associated Social Security Number
12 and California driver's license number. In the records was located a \$29,500 wire transfer from TD
13 Bank on April 04, 2017. Also in the records were three withdrawals on April 05, 2017: a branch
14 withdrawal for \$18,250, a different branch withdrawal for \$10,000, and an automated teller machine
15 (ATM) withdrawal for \$1,000.

16 437. Law Enforcement obtained video from Bank of America from April 05, 2017,
17 covering withdrawals from L. THOMAS' account ending 6426. The surveillance video depicted L.
18 THOMAS at the branch counters and ATM.

19 438. The remaining funds of L. THOMAS' Bank of America account ending 6426 were
20 transferred to another Bank of America account, ending 7329, on April 05, 2017. Records obtained
21 by Law Enforcement showed the Bank of America account ending 7329 was opened by L. THOMAS
22 on April 05, 2017, using an associated Social Security Number and California driver's license
23 number.

24 439. L. THOMAS was found to have opened a US Bank checking account, ending 6615, on
25 March 07, 2017. The signature card included L. THOMAS' associated Social Security Number, home
26 address 612 El Sereno Drive, Bakersfield, California; and phone number 661-421-2460.

1 440. Based on the information provided to R.G. by Eric MATHEWS; information provided
2 by L. THOMAS to US Bank, JPMorgan Chase, and Bank of America; and surveillance video; agents
3 believe that L. THOMAS participated in defrauding victims across state lines.

4 441. During the wiretap investigation, agents intercepted a call made by L. THOMAS that
5 appeared consistent the nature of the above scam. On November 1, 2017, at 1230 hours, L.
6 THOMAS, using TT7, called 661-885-0008, call number 238, and spoke with an unknown female
7 (UF). L. THOMAS told the UF about a conversation he had with another unidentified subject. L.
8 THOMAS said the subject told him to get some new accounts by Monday, and they would hit them
9 Monday. L. THOMAS asked about the accounts the subject had already. L THOMAS said the subject
10 told him he had two and was going to hit those also. The subject also told L. THOMAS he wanted to
11 start new next week. L. THOMAS said he needed time to gather people and get an ID.

12 442. On November 03, 2017, at 1314 hours, agents intercepted a call made by L.
13 THOMAS, using TT7, to 323-663-8222, call number 690, a Citibank branch located at 5000 Sunset
14 Boulevard, Los Angeles, California. During the call, Larry THOMAS asked the representative what
15 documents were required to open an account.

16 443. On November 15, 2017, at 1411 hours, agents intercepted a call between L. THOMAS
17 and an unknown male (UM). Agents believe that during the call, L. THOMAS was discussing some
18 of the methods used to commit the fraud. L. THOMAS said, "He doin' uh he just started back this
19 week or whatever. I sent him, he doin' somebody else's shit right now but uh, but uh he probably do
20 your shit tomorrow or the next day." L. THOMAS continued, "When I send 'em, like he just pick
21 which one he gonna grab." L. THOMAS said, "You got like 2 or 3, and then another homie got like 2,
22 and then I got like email like different people." L. THOMAS further said, "He just doin my boy's
23 B.O.A. (Bank of America) right now. Like I sent the information, he said he hit me up after." L.
24 THOMAS said, "All I know is if they need a Wells account, a B.O.A. account, any account they need
25 they just gonna grab. It's not really about the person. They just look at the accounts not really the
26 person." L. THOMAS said, "But he gonna do yours too." UM said, "So it'll be 2 or 3 months." L.

1 THOMAS said, "No." L. THOMAS said, "I'm talking to cuz' right now about my other boys
2 shit...he'll get to your shit should be this week." L. THOMAS said, "I hit you up the other day and
3 you didn't answer." UM said, "Yeah you probably did." L. THOMAS said, "Let me call you back I
4 gotta write this shit out, I gotta write this information out real quick."

5 444. Based on my knowledge of this investigation, and information that L. THOMAS was
6 involved in the wire fraud, I believe L. THOMAS was discussing the methods of the wire fraud to the
7 UF and UM. Furthermore based on L. THOMAS' history of having multiple bank accounts, I believe
8 L. THOMAS was preparing to obtain a Citibank account. The calls lead me to believe that L.
9 THOMAS arranges the wire fraud with another subject. That subject has yet to be determined.

10 445. In a potentially related call on October 17, 2017, during session 3984, CRAWFORD at
11 TT#1 received a call from J.W. at TT#16. During the conversation, CRAWFORD said, "What Sazo
12 want?" J.W. said, "He came and drug tested me and got on." Crawford, [UI] J.W., True, true, true.
13 Yup. That nigga uh what's his name just left." CRAWFORD, Who? J.W., "TG." (Moniker for
14 L.THOMAS) CRAWFORD, "From yo house?" J.W., "Na, he came next door to grab some mail and
15 shit." CRAWFORD, "From Damien?" J.W., "Na, not from DAMIEN what the fuck. [UI] You know
16 that Shitty's grandma now?" CRAWFORD, "Yeah." J.W., "yeah, he grabbed the mail yesterday uh I
17 don't know he just grabbed hella mail." CRAWFORD, "TG?" J.W., "Yeah bitch." CRAWFORD,
18 "From Shitty?" (Moniker for WSC Deon DAVIS) J.W., "Not from shitty, I don't know who its for, its
19 for the old people. It's somethin he was saying I'm like oh yeah I had him talking I'm like who the
20 fuck is this [UI] and shit." CRAWFORD, "That's weird cuz." [UI] J.W., "I was just like, aw he was
21 trying to explain it to me, I was just like shit I can care less." CRAWFORD, "Yeah, see Imma keep it
22 gangster I start thinking cuz on some low ball weird shit." J.W., "Cuz came out with hella Jewelry on,
23 a collared shirt, and some gym shorts." CRAWFORD, "I be thinking cuz on some weird shit." J.W.,
24 "Na he had a whole stack of mail around and I don't know I was just looking like. I'm like you know
25 uh he was like this uh doberman whoop whoop Im like yeah cuz stay right here whoop whoop this
26 fools grandparents or whatever, he was just like yeah I just come to grab the mail and shit you know
27
28

1 for old people. I'm like shit I think this Shitty's Grandma whoop whoop. He was just like Yeaahh."
2 CRAWFORD, "Hey imma call you right back." J.W., "Aight." [UI] CRAWFORD, "Invite your boy
3 to the party."

4 446. Based on my knowledge of the wire fraud scam perpetrated by L.THOMAS in the
5 past, I believe that L.THOMAS's retrieval of this mail as described by J.W. is possibly related to the
6 same or a similar wire fraud scam. Notably, J.W. said that "TG" (known moniker for L.THOMAS)
7 "... grabbed the mail yesterday uh I don't know he just grabbed hella mail." Later in the conversation,
8 J.W. stated "Not from shitty, [moniker for WSC Deon DAVIS] I don't know who its for, its for the
9 old people. It's somethin he was saying I'm like oh yeah I had him talking I'm like who the fuck is this
10 [UI] and shit ... he was trying to explain it to me, I was just like shit I can care less." I believe based
11 on my knowledge of such scams, that criminals committing the fraud will often steal the mail of
12 elderly individuals in an effort to obtain information valuable to their respective fraud. Here, J.W.
13 appears to indicate that L.THOMAS was explaining to J.W. what the mail was for, but J.W. did not
14 care.

15 447. On October 10, 2017, the Honorable United States Magistrate Judge Jennifer
16 Thurston authorized search warrant 5:17-sw-00103-JLT for L. THOMAS' associated Facebook.com,
17 social media account, with user profile name including Bandika Bandika Bandika. In a private
18 message conversation between L. THOMAS and Facebook.com profile RV JONES JR on August 19,
19 2017, at 16:30:43, RV JONES JR wrote, "Call me." On August 19, 2017, at 16:31:17, L. THOMAS
20 and RV JONES JR conducted a voice over internet protocol call for "22 [seconds]." On August 19,
21 2017, at 16:44:21, L. THOMAS wrote, "Wat time u get off? I'm trying put some money in yo
22 pocket." L. THOMAS wrote at 16:47:56, "Look cuz young told u what's up when we was in the car
23 I'm not telling u shit on here I told u I'm talk to u in person." L. THOMAS wrote at 16:49:20, "Fuc
24 no u playing and I told u don't be telling nobody what we got going on foo u over there running yo
25 mouth."

26 448. Based on the knowledge of the fraud, agents believe that L. THOMAS was using
27
28

1 Facebook to recruit Facebook profile user RV JONES JR. Based on L. THOMAS' statement "...I'm
2 not telling u shit on here I told u I'm talk to u in person," I believe that L. THOMAS is worried about
3 Facebook being monitored by Law Enforcement and detecting his fraudulent activity. Based on L.
4 THOMAS' statement "...I told u don't be telling nobody what we got going on foo," I believe that L.
5 THOMAS was worried about Law Enforcement human sources learning of his fraudulent activity.

6 449. Within the same search warrant for L. THOMAS' Facebook profile were private
7 messages from Facebook profile YOUNG JONES. A message from YOUNG JONES on August 22,
8 2017, at 05:58, read, "Customer: Jermaine Q Jones Address: 308 H St City: Bakersfield State: CA
9 Zip: 93304 Social Security: 6046 Account number: [6806] Routing number: 322271627." A message
10 from YOUNG JONES on August 24, 2017, at 01:19, read, "Customer: Jermaine Q Jones Address:
11 308 H St City: Bakersfield State: CA Zip: 93304 Social Security: 6046 Account number: [8256]
12 Routing number: 322271627."

13 450. Agents recognize the content of YOUNG JONES' messages matches information
14 needed to conduct wire transfers. Based on knowledge of the fraud L. THOMAS has engaged in,
15 agents believe that YOUNG JONES was providing information to L. THOMAS to further fraudulent
16 wire transfers.

17 451. Agents believe evidence of L. THOMAS's involvement in the wire fraud scheme will
18 be located at his residence. Based on my training and experience, I am aware that evidence of wire
19 fraud, consisting in part but not limited to, bank records, receipts, account numbers, and personal
20 identifying information of potential victims, is often found in the residences of those suspected of
21 these financial crimes.

22 452. In addition to the financial crimes, L. THOMAS has also been known to possess
23 firearms. On October 14, 2017, at 0942 hours, call number 904, during an intercepted call over TT2,
24 used by D.W., D.W. and L. THOMAS spoke about a firearm that L. THOMAS threw from his car
25 prior to a law enforcement traffic stop. Specifically, L. THOMAS told D.W. that prior to getting
26 pulled over he threw his "flap" out the window near the McDonalds. L. THOMAS told D.W. that he
27

1 went back later and got the gun and wiped it down. He told D.W. that he was going to leave his gun
2 at D.W.'s residence. L. THOMAS told D.W. that he was going to get another gun.

3 453. L. THOMAS continued to discuss firearms with other WSC gang members. On
4 November 6, 2017, at 1530, L. THOMAS, using TT7, called Ladarieous JONES, using TT15. During
5 the call, THOMAS asked JONES, "Bro, what the fuck is going on?". JONES said, "Shit, they, the
6 police keep coming in and out this motherfucker and all these niggas keep hella running like."
7 THOMAS told him, "You need to tell these niggas that if they got flap (GUNS) on them they better,
8 they might want to get rid of them. Nigga, they about to come up in this motherfucker." Later in the
9 conversation THOMAS again told JONES, "Yeah, tell them if they got flap, they might want to put
10 them motherfuckers up, right now, nigga.

11 454. Based on my knowledge of this investigation, I believe that L. THOMAS was telling
12 JONES to warn other WSC gang members to hide their guns.

13 455. On November 17, 2017, BPD officers responded to "the P's" located at 720 Terrace
14 Way in Bakersfield due to reports of a large gathering. When officers arrived members of the
15 gathering dispersed and officers subsequently located several discarded firearms. At 22:37 hours,
16 L.THOMAS received an incoming call (Call 2751) from UM264 using telephone number 661-578-
17 4237. During the conversation, "Larry THOMAS said, "Who rockin' mine?" UM said, "Who rockin'
18 his?" UM2 said, "I don't know." UM264 said, "Who'd you authorize? Jalen, or somebody?"
19 THOMAS said, "Man, tell them all them niggas bro, like niggas, just everybody, just keep it gangsta
20 bro, no funny shit." UM264 said, "Alright, I'm a, I'm a holla right now about that." Based on the
21 context of intercepted calls surrounding the guns seized at the P's and calls that occurred prior to call
22 2751, I believe when L.THOMAS said, "Who's rockin mine?" he was referring to his gun that he
23 believed had not been seized by BPD. When UM264 said, "Who'd you authorize? Jalen or
24 somebody?", I believe UM264 was asking who L.THOMAS gave permission to hold or use his gun.
25 When L.THOMAS said, "Man, tell them all them niggas bro, like niggas, just everybody, just keep it
26 gangsta bro, no funny shit", I believe L.THOMAS is giving instructions through UM264 on how they

1 are supposed to hold or use his gun. I also believe this shows L.THOMAS's rank within the WSC.

2 456. I have reviewed Kern County Superior Court records and learned that in 2013 L.
3 THOMAS sustained a felony conviction for California Penal Code 29800(A)(1), Possession of a
4 firearm by a felon, which is a crime punishable by a term of imprisonment exceeding one year. L.
5 THOMAS originally sustained a felony conviction in 2010 after sustaining a conviction for a
6 violation of California Penal Code 246.3(A), reckless discharge of a firearm.

7 457. I believe based on the evidence above there probable cause to search 6105 Ringsdale
8 Court, Bakersfield, CA, and 612 El Sereno Drive, Bakersfield, CA the residences of L.THOMAS for
9 violations of 18 U.S.C. 1343 (wire fraud) and 18 U.S.C. § 922(g)(1) (felon in possession of a
10 firearm). Based on the intercepted calls above and in the section regarding L.THOMAS, his criminal
11 history, and him being a documented member in the WSC, I also believe that there is probable cause
12 to search his residences for violations of 18 U.S.C. 1962(c),(d) (Racketeer Influenced and Corrupt
13 Organizations) including indicia of L.THOMAS' membership and participation in the WSC, as well
14 as evidence of his agreement to violate section 1962(c) in violation of section 1962(d), and his
15 participation in the conduct of the WSC's affairs through a pattern of racketeering activity in
16 violation of section 1962(c).

17 **VI. SEARCH AND SEIZURE OF COMPUTER/ELECTRONIC/DIGITAL DATA**

18 458. This application seeks permission to enter, search for, and seize evidence and
19 contraband of the crimes described above stored on any electronic device capable of storing
20 electronic evidence as well as any contraband/records in paper form that constitute fruits and
21 instrumentalities of the crimes.

22 **A. Probable Cause to Believe that Digital Devices Containing Evidence of Federal
23 Crimes and Digital Devices Used to Facilitate Federal Crimes Will Be Found at the
SUBJECT PREMISES.**

24 459. Based on my training and experience, I know that narcotics traffickers and gang
25 members commonly utilize numbers of digital devices in order to facilitate their narcotics trafficking
26 and other criminal activity. These digital devices, can include but are not limited to cellular phones,
27

1 smart phones, digital tablets, computers, laptops, digital cameras, and other digital devices capable of
2 storing information, photos, and of conducting computation, that allow communication between
3 members of the organization, and communication between members of the organization to purchasers
4 and users of the organizations' product.

5 460. In this specific case, agents have intercepted numerous text messages related to drug
6 trafficking activity and other criminal activity which were sent and/or received from the cellular
7 devices of several of the Target Subjects. Agents are also aware that many of the Target Subjects
8 have Facebook accounts, and information has been posted to these accounts. Based on my training,
9 experience, and based on the facts of this case, I believe that the above-listed and otherwise yet
10 unknown digital devices are being used to facilitate the narcotics trafficking of other criminal activity
11 of the Target Subjects and will be found at the SUBJECT PREMISES.

12 461. Based upon my training and experience, and information related to me by agents and
13 others involved in the forensic examination of computers and digital devices, I know that evidence in
14 digital form can be stored on a variety of systems, storage devices, or media including hard disk
15 drives, floppy disks, compact disks, magnetic tapes, flash drives, and memory chips. Some of these
16 devices can be smaller than a thumbnail and can take several forms, including thumb drives, secure
17 digital media used in phones and cameras, personal music devices, and similar items. I also know
18 evidence can be printed off in and stored in paper form which may have stemmed from files no longer
19 electronically stored and recoverable through sound forensic practices. These files may include paper
20 printout, developed and undeveloped film, photographic slides or other visual depictions, including
21 books or magazines.

22 462. I submit that if a computer or storage medium is found at the SUBJECT PREMISES,
23 there is probable cause to believe those records will be stored on that computer or storage medium,
24 for at least the following reasons:

25 a. Based on my training and experience, and information related to me by agents
26 and others involved in the forensic examination of computers and digital devices, I know that

1 computer files or remnants of such files can be recovered months or even years after they have been
2 downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded
3 to a storage medium can be stored for years at little or no cost. Even when files have been deleted,
4 they can be recovered months or years later using forensic tools. This is so because when a person
5 “deletes” a file on a computer, the data contained in the file does not actually disappear; rather, that
6 data remains on the storage medium until it is overwritten by new data.

7 b. Therefore, deleted files, or remnants of deleted files, may reside in free space
8 or slack space—that is, in space on the storage medium that is not currently being used by an active
9 file—for long periods of time before they are overwritten. In addition, a computer’s operating system
10 may also keep a record of deleted data in a “swap” or “recovery” file.

11 c. Wholly apart from user-generated files, computer storage media—in particular,
12 computers’ internal hard drives—contain electronic evidence of how a computer has been used, what
13 it has been used for, and who has used it. To give a few examples, this forensic evidence can take the
14 form of operating system configurations, artifacts from operating system or application operation, file
15 system data structures, and virtual memory “swap” or paging files. Computer users typically do not
16 erase or delete this evidence because special software is typically required for that task. However, it
17 is technically possible to delete this information.

18 d. Similarly, files that have been viewed via the Internet are sometimes
19 automatically downloaded into a temporary Internet directory or “cache.”

20 **B. Forensic Evidence**

21 463. As further described in Attachment B, this application seeks permission to locate not
22 only electronically stored information that might serve as direct evidence of the crimes described on
23 the warrant, but also forensic evidence that establishes how a digital device was used, the purpose of
24 its use, who used it, and when. It can be very important in criminal cases to seek “attribution” data so
25 that an event or communication can be associated with a person. Based upon my training and
26 experience, and information related to me by agents and others involved in the forensic examination
27

1 of computers and digital devices, this authority is sought, and there is probable cause to believe that
2 this forensic electronic evidence might be on any digital devices seized, because:

3 a. In some instances, the computer “writes” to storage media without the specific
4 knowledge or permission of the user. Generally, data or files that have been received via the Internet
5 are automatically downloaded into a temporary Internet directory or cache. The browser typically
6 maintains a fixed amount of hard drive space devoted to such data or files, and the files are only
7 overwritten as they are replaced with more recently viewed Internet pages. Thus, the ability to
8 retrieve artifacts of electronic activity from a hard drive depends less on when the file was
9 downloaded or viewed than on a particular user’s operating system, storage capacity, and computer
10 usage. Logs of access to websites, file management/transfer programs, firewall permissions, and
11 other data assist the examiner and investigators in creating a “picture” of what the computer was
12 doing and how it was being used during the relevant time in question. Given the interrelationships of
13 the data to various parts of the computers operation, this information cannot be easily segregated.

14 b. Data on the storage medium may reveal evidence of a file that was once on the
15 storage medium but has since been deleted or edited, or it could reveal a deleted portion of a file
16 (such as a paragraph that has been deleted from a word processing file). Virtual memory paging
17 systems can leave traces of information on the storage medium that show what tasks and processes on
18 the computer were recently used. Web browsers, email programs, and chat programs store
19 configuration data on the storage medium that can reveal information such as online nicknames and
20 passwords. Operating systems can record additional data, such as the attachment of peripherals, the
21 attachment of USB flash storage devices, and times the computer was in use. Computer file systems
22 can record data about the dates files were created and the sequence in which they were created. This
23 data can be evidence of a crime, can indicate the identity of the user of the digital device, or can point
24 toward the existence of evidence in other locations (or on other devices).

1 c. Forensic evidence on a device can also indicate who has used or controlled the
2 device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while
3 executing a search warrant at a residence.

4 d. A person with appropriate familiarity with how an electronic device works
5 may, after examining this forensic evidence in its proper context, be able to draw conclusions about
6 how electronic devices were used, the purpose of their use, who used them, and when.

7 e. The process of identifying the exact electronically stored information on a
8 storage medium that are necessary to draw an accurate conclusion is a dynamic process. Electronic
9 evidence is not always data that can be merely reviewed by a review team and passed along to
10 investigators. Whether data stored on a computer is evidence may depend on other information
11 stored on the computer and the application of knowledge about how a computer behaves. Therefore,
12 contextual information necessary to understand other evidence also falls within the scope of the
13 warrant.

14 f. Further, evidence of how a digital device has been used, what it has been used
15 for, and who has used it, may be learned from the absence of particular data on a digital device.
16 Specifically, the lack of computer security software, virus protection, malicious software, evidence of
17 remote control by another computer system, or other programs or software may assist in identifying
18 the user indirectly and may provide evidence excluding other causes for the presence or absence of
19 the items sought by this application. Additionally, since computer drives may store artifacts from the
20 installation of software that is no longer active, evidence of the historical presence of the kind of
21 software and data described may have special significance in establishing timelines of usage,
22 confirming the identification of certain users, establishing a point of reference for usage and, in some
23 cases, assisting in the identification of certain users. This data can be evidence of a crime, can
24 indicate the identity of the user of the digital device, or can point toward the existence of evidence in
25 other locations. Evidence of the absence of particular data on the drive is not generally capable of
26 being segregated from the rest of the data on the drive.

1 g. Based on my training and experience and information related to me by agents
2 and others involved in the forensic examination of computers and digital devices, I know that when
3 an individual uses an electronic device to facilitate his/her narcotics trafficking activities, the
4 individual's electronic device will generally serve both as an instrumentality for committing the
5 crime, and also as a storage medium for evidence of the crime. The electronic device is an
6 instrumentality of the crime because it is used as a means of committing the criminal offense. The
7 electronic device is also likely to be a storage medium for evidence of crime. From my training and
8 experience, I believe that an electronic device used to commit a crime of this type may contain: data
9 that is evidence of how the electronic device was used; data that was sent or received; and other
10 records that indicate the nature of the offense.

11 **C. Removal of Data Storage Devices For Review In A Laboratory Setting May Be**
12 **Required**

13 464. Based upon my training and experience, and information related to me by agents and
14 others involved in the forensic examination of computers and digital devices, I know that a forensic
15 image is an exact physical copy of a data storage device. A forensic image captures all data on the
16 subject media without viewing or changing the data in any way. Absent unusual circumstances, it is
17 essential that a forensic image be obtained prior to conducting any search of data for information
18 subject to seizure pursuant to the warrant. I also know that during the search of the premises it is not
19 always possible to create a forensic image of or search digital devices or media for data. I also know
20 that it is frequently necessary to remove digital devices or media for later laboratory evaluation off-
21 site under controlled circumstances. This is true for a number of reasons, including the following:

22 a. Searching digital devices can be a highly technical process that requires
23 specific expertise and specialized equipment. Because there are so many different types of digital
24 devices and software in use today, it is difficult to anticipate all of the necessary technical manuals,
25 specialized equipment, and specific expertise necessary to conduct a thorough search of the media to
26 ensure that the data will be preserved and evaluated in a useful manner.

1 b. Searching digital devices can require the use of precise, scientific procedures
2 designed to maintain the integrity of the evidence. The recovery of such data may require the use of
3 special software and procedures, such as those used in a law enforcement laboratory.

4 c. The volume of data stored on many digital devices is typically so large that it
5 will be highly impractical to search for data during the execution of the physical search of the
6 premises. Storage devices capable of storing 500 gigabytes of data are now commonplace in desktop
7 computers. It can take several hours, or even days, to image a single hard drive. The larger the drive,
8 the longer it takes. Depending upon the number and size of the devices, the length of time that agents
9 must remain onsite to image and examine digital devices can become impractical.

10 d. Since digital data may be vulnerable to inadvertent modification or destruction,
11 a controlled environment, such as a law enforcement laboratory, may be essential to conduct a
12 complete and accurate analysis of the digital devices from which the data will be extracted. Software
13 used in a laboratory setting can often reveal the true nature of data. Moreover, a computer forensic
14 reviewer needs a substantial amount of time to extract and sort through data that is concealed or
15 encrypted to determine whether it is evidence, contraband, or an instrumentality of a crime.

16 e. Analyzing the contents of a computer or other electronic storage device, even
17 without significant technical difficulties, can be very challenging, and a variety of search and
18 analytical methods must be used. For example, searching by keywords, which is a limited text-based
19 search, often yields thousands of hits, each of which must be reviewed in its context by the examiner
20 to determine whether the data is within the scope of the warrant. Merely finding a relevant hit does
21 not end the review process. The computer may have stored information about the data at issue which
22 may not be searchable text, such as: who created it; when and how it was created, downloaded, or
23 copied; when it was last accessed; when it was last modified; when it was last printed; and when it
24 was deleted. The relevance of this kind of data is often contextual. Furthermore, many common
25 email, database, and spreadsheet applications do not store data as searchable text, thereby
26 necessitating additional search procedures. To determine who created, modified, copied,

1 downloaded, transferred, communicated about, deleted, or printed data requires a search of events
2 that occurred on the computer in the time periods surrounding activity regarding the relevant data.
3 Information about which users logged in, whether users shared passwords, whether a computer was
4 connected to other computers or networks, and whether the users accessed or used other programs or
5 services in the relevant time period, can help determine who was sitting at the keyboard.

6 f. Searching digital devices can require the use of precise, scientific procedures
7 designed to recover latent data. The recovery of such data may require the use of special software
8 and procedures. Data that represents electronic files or remnants of such files can be recovered
9 months or even years after it has been downloaded onto a hard drive, deleted, or viewed via the
10 Internet. Even when such files have been deleted, data can be recovered months or years later using
11 readily available forensic tools. Normally, when a person deletes a file on a computer, the data
12 contained in the file does not actually disappear; rather, that data remains on the hard drive until it is
13 overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in space on
14 the hard drive or other storage media that is not allocated to an active file. In addition, a computer's
15 operating system may keep a record of deleted data in a swap or recovery file or in a program
16 specifically designed to restore the computer's settings in the event of a system failure.

17 **D. Search Procedure**

18 465. In searching for data capable of being read, stored, or interpreted by a computer or
19 storage device, law enforcement personnel executing the search warrant will employ the following
20 procedure:

21 a. Seizure of digital devices for off-site imaging and search: If no computer
22 personnel are present at the execution of the search warrant, or if they determine that a digital device
23 cannot be searched or imaged on site in a reasonable amount of time and without jeopardizing the
24 ability to preserve data, the digital device will be seized and transported to an appropriate law
25 enforcement laboratory for review.

1 cell phones capable of being used to commit or further the crimes outlined above, or to create, access,
2 or store evidence, contraband, fruits, or instrumentalities of such crimes, as set forth in Attachment B;

3 d. Any documentation, operating logs, and reference manuals regarding the
4 operation of the computer equipment, storage devices, or software;

5 e. Any applications, utility programs, compilers, interpreters, and other software
6 used to facilitate direct or indirect communication with the computer hardware, storage devices, or
7 data to be searched;

8 f. Any physical keys, encryption devices, dongles, or similar physical items
9 which are necessary to gain access to the computer equipment, storage devices, or data;

10 g. Any passwords, password files, test keys, encryption codes, or other
11 information necessary to access the computer equipment, storage devices, or data;

12 h. All records, documents, programs, applications, or materials created, modified,
13 or stored in any form, including in digital form, that show the actual user(s) of the computer or digital
14 device during any time period in which the device was used to commit the crimes referenced above,
15 including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web
16 pages; email addresses used from the Device; MAC IDs and/or Internet Protocol addresses used by
17 the Device; email, instant messages, and other electronic communications; address books; contact
18 lists; records of social networking and online service usage; and software that would allow others to
19 control the digital device such as viruses, Trojan horses, and other forms of malicious software (or
20 alternatively, the lack of software that would allow others to control the digital device);

21 i. All records, documents, programs, applications, or materials created, modified,
22 or stored in any form, including in digital form, on any computer or digital device, that show
23 evidence of counter-forensic programs (and associated data) that are designed to eliminate data from
24 the computer or digital device;

25 j. All records, documents, programs, applications, or materials created, modified,
26 or stored in any form, including in digital form, on any computer or digital device, that show

1 contextual information necessary to understand the evidence, contraband, fruits, or instrumentalities
2 described in Attachment B.

3 **F. Retention of Images**

4 467. If the original digital device was seized, law enforcement personnel will perform an
5 initial search of the original digital device within a reasonable amount of time. If, after conducting
6 the initial search, law enforcement personnel determine that an original digital device contains any
7 data falling within the list of items to be seized pursuant to this warrant, the government will retain
8 the original digital device to, among other things, litigate the admissibility/authenticity of the seized
9 items at trial, ensure the integrity of the copies, ensure the adequacy of chain of custody, and resolve
10 any issues that potentially might be raised regarding changed conditions of the evidence. If the
11 government needs additional time to determine whether an original digital device contains any data
12 falling within the list of items to be seized pursuant to this warrant, it may seek an extension of the
13 time period from the Court.

14 468. If an original digital device does not contain any data falling within the list of items to
15 be seized pursuant to this warrant, the government will: return that original digital device to its owner
16 within a reasonable period of time if it can be lawfully possessed; seal any image previously made of
17 the device; and not review the sealed image absent further authorization from the Court.

18 469. The government will retain a forensic image of the digital device subjected to analysis
19 for a number of reasons, including proving the authenticity of evidence to be used at trial; responding
20 to any potential questions regarding the corruption of data; establishing the chain of custody of data;
21 refuting any potential claims of fabrication, tampering, or destruction with/of data; and addressing
22 potential exculpatory evidence claims where, for example, a defendant claims that the government
23 avoided its obligations by destroying data or returning it to a third party.

24 **G. Inventory and Return**

1 470. With respect to the seizure of electronic storage media or the seizure or imaging of
2 electronically stored information, the search warrant return to the Court will describe the physical
3 storage media that were seized or imaged.

4 **H. Prior Efforts to Obtain Evidence**

5 471. The government has made the following prior efforts in other judicial fora to obtain
6 evidence sought in the warrant: NONE

7 **VI. REQUEST FOR SEALING**

8 472. It is respectfully requested that this Court issue an order sealing, until further order of
9 the Court, all papers submitted in support of this application, including the application and search
10 warrant. I believe that sealing these documents is necessary because the items and information to be
11 seized are relevant to an ongoing investigation. I have learned that online criminals actively search
12 for criminal affidavits and search warrants via the Internet, and disseminate them to other online
13 criminals as they deem appropriate, i.e., post them publicly online through the carding forums.
14 Premature disclosure of the contents of this affidavit and related documents may have a significant
15 and negative impact on the continuing investigation and may severely jeopardize its effectiveness. If
16 the targets learned of the nature and scope of the investigation even after the execution of the search
17 warrant, they may flee and warn co-conspirators, and/or change their methods and modes of operation
18 to avoid further detection.

19 **CONCLUSION**

20 473. Based on the foregoing, I believe there is probable cause that the above-identified
21 Target Subjects committed the offenses summarized in section II(A).

22 474. Also based on the foregoing, I submit there is probable cause to believe that evidence,
23 fruits, and instrumentalities of the various federal offenses summarized in paragraph II(B), as those

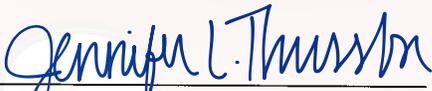
24 //

25 //

1 items are set forth in ATTACHMENT B1 through B11, will be located at the SUBJECT PREMISES
2 (as those are described in ATTACHMENTS A-1 through A-11.
3

4 
5 Brian Myers
6 Special Agent
7 Federal Bureau of Investigation

8 Affidavit submitted by email/pdf and
9 attested to me as true and accurate by
10 telephone consistent with Fed.R.Crim.P 4.1 and
11 41(d)(3) this 6th day of December 2017.

12 
13 JENNIFER L. THURSTON
14 UNITED STATES MAGISTRATE JUDGE
15 EASTERN DISTRICT OF CALIFORNIA

16 Approved as to Form:

17 /s/ Angela Scott
18 ANGELA SCOTT
19 Assistant U.S. Attorney
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ATTACHMENT A-1

The location to be searched has the physical address of 409 Stephens Drive, Apt #9, Bakersfield, California (hereinafter, the “**W.THOMAS RESIDENCE**”). This apartment complex consists of (4) four two story, multi-unit apartment buildings. Each building shares the address of 409 Stephens Dr, however each apartment unit is individually numbered. The building for apartment #9, is constructed along the north side of the property and is the only apartment building constructed along the north property line. 409 Stephens Dr. Apt #9, is the furthest west apartment unit on the ground floor of the building and is further described as a two story apartment building; composed of beige colored stucco exterior, red trim, and light gray asphalt roofing. The front door to the residence faces in a southerly direction and is concealed behind a black security screen door. The number “9” is posted near the left side of the security screen door and is only visible in close proximity to the door. Covered parking stalls are located to the east of the apartment and are accessible from Stephens Dr. Additional covered parking is located to the west of the apartment complex and is accessible from Delfino Ln. No gates were observed and access to the complex is unrestricted.

Also to be searched are all rooms 409 Stephens Drive, Apt #9, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 409 Stephens Drive, Apt #9, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **W.THOMAS RESIDENCE** includes the person of William THOMAS (year of birth 1982), if located at the **W.THOMAS RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-1

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to possess with intent to distribute, and to distribute, crack cocaine, and manufacture and possession with intent to distribute crack cocaine; 18 U.S.C. § 1955 (illegal gambling business), and 18 U.S.C. § 1962(c),(d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **W.THOMAS RESIDENCE**, as that location is defined in ATTACHMENT A-1:

a. Indicia of occupancy, residency, control and/or ownership of the **W.THOMAS RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;

b. Any controlled substance, including but not limited to: methamphetamine, cocaine, heroin, steroids, marijuana, or tetrahydrocannabinol (“THC”) in any form;

c. Paraphernalia commonly associated with the manufacture and packaging for sale or the transportation of controlled substances, including cutting agents and diluents, chemical testing devices, packaging materials such as glycine or plastic bags, tupperware, cellophane, heat sealers, triple beam scales and other weighing devices, measuring devices, strainers, boxes, and scientific grade beakers;

d. Cash over \$1,000

e. Items used in the packaging of currency for consolidation and transportation, such as money counting machines, money wrappers, rubber bands, duct or wrapping tape, and plastic sealing machines;

f. Bank account records, wire transfer records, bank statements, safe deposit box keys and records, money containers, financial records and notes, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the sale of controlled substances;

g. Drug or money ledgers, drug distribution or customer lists, correspondence,

notations, logs, receipts, journals, books, records and other documents, which were created, modified, or stored in any form, including on any digital device, and which indicate the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed;

h. Personal telephone books, address books, telephone bills, photographs, letters, cables, telegrams, facsimiles, personal notes, documents and other items, which were created, modified, or stored in any form, including on any digital device, and which reflect contact information, names, addresses, telephone numbers, or any other personal information of participants in narcotics trafficking activities, including suppliers, distributors and customers;

i. Records of off-site storage locations, including safe deposit box keys, records, receipts and rental agreements for storage facilities;

j. Evidence of the operation of an illegal gambling business, including machines and electronics used for gambling, purchase receipts for the equipment, business records, including records of debts collected/owed, records and information regarding Skillmine.net, bank records and other evidence related to illegal gambling;

k. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

l. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

m. Documents, records, pieces of paper, and other items, including photographs,

reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/electronic form;

n. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use "W," "CT," and "NY," as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

o. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/electronic form;

p. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

q. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/electronic form;

r. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;

s. Ammunition of all types and calibers;

t. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

u. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of drug trafficking

activities, gambling activities, or racketeering activities such as robbery;

v. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(u) above;

w. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

x. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

y. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

v. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

w. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

x. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

y. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files;

cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

aa. As used herein, the terms “records,” “documents,” “programs,” “applications,” “photographs,” and “materials” include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

bb. As used herein, the term “digital device” includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.



ATTACHMENT A-2

The location to be searched has the physical address of 4032 O STREET, APT 22, Bakersfield, California California (hereinafter, the “**WILLIS RESIDENCE**”). The residence is a two story multi-unit apartment complex, located on the northeast corner of O Street and 40th Street, Bakersfield. The apartment is beige in color with a brown trim and brown composite roof. The front door is brown and faces south towards 40th Street. The number 22 appears in gold color on the front door of the apartment. Apartment 22 is the fourth door from west to east and the fourth door from east to west.

Also to be searched are all rooms inside 4032 O STREET, APT 22, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 4032 O STREET, APT 22, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **WILLIS RESIDENCE** includes the person of Danny WILLIS (year of birth 1984), if located at the **WILLIS RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-2

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to possess with intent to distribute, and to distribute, heroin, 18 U.S.C. § 922(g)(1) (felon in possession of a firearm), 18 U.S.C. § 1959 (Violent Crime in Aid of Racketeering); and 18 U.S.C. § 1962(c),(d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **WILLIS RESIDENCE**, as that location is defined in ATTACHMENT A-2:

- a. Indicia of occupancy, residency, control and/or ownership of the **WILLIS RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;
- b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;
- c. Ammunition of all types and calibers;
- d. Any controlled substance, including but not limited to: methamphetamine, cocaine, heroin, steroids, marijuana, or tetrahydrocannabinol (“THC”) in any form;
- e. Paraphernalia commonly associated with the manufacture and packaging for sale or the transportation of controlled substances, including cutting agents and diluents, chemical testing devices, packaging materials such as glycine or plastic bags, tupperware, cellophane, heat sealers, triple beam scales and other weighing devices, measuring devices, strainers, boxes, and scientific grade beakers;
- f. Cash over \$1,000
- g. Items used in the packaging of currency for consolidation and transportation, such as money counting machines, money wrappers, rubber bands, duct or wrapping tape, and plastic sealing machines;
- h. Bank account records, wire transfer records, bank statements, safe deposit box

keys and records, money containers, financial records and notes, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the sale of controlled substances;

i. Drug or money ledgers, drug distribution or customer lists, correspondence, notations, logs, receipts, journals, books, records and other documents, which were created, modified, or stored in any form, including on any digital device, and which indicate the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed;

j. Personal telephone books, address books, telephone bills, photographs, letters, cables, telegrams, facsimiles, personal notes, documents and other items, which were created, modified, or stored in any form, including on any digital device, and which reflect contact information, names, addresses, telephone numbers, or any other personal information of participants in narcotics trafficking activities, including suppliers, distributors and customers;

k. Records of off-site storage locations, including safe deposit box keys, records, receipts and rental agreements for storage facilities;

l. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

m. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

n. Documents, records, pieces of paper, and other items, including photographs,

reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/electronic form;

o. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use "W," "CT," and "NY," as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

p. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

q. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

r. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

s. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

t. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of drug trafficking activities or racketeering activities such as robbery;

u. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to

commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(t) above;

s. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

t. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others

to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms “records,” “documents,” “programs,” “applications,” “photographs,” and “materials” include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term “digital device” includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.

ATTACHMENT A-3

The location to be searched has the physical address of 1321 N Street, Bakersfield, California (hereinafter, the “**G.PIERSON RESIDENCE**”). The residence is a single family, two-story, residence on the west side of N Street and the front door faces to the east. It is the 2nd house south of 14th Street. This residence sits on a large parcel across the street from the “Mayan” movie theatre. This property appears to have multiple out buildings including a detached garage. The numbers “1321” are black in color affixed to decorative pillar post on the front porch. The residence is composed of white siding and shingle panels and the trim and composite single roof are green in color. There are numerous large trees surrounding the residence, including two very large eucalyptus trees and a large hedge row at the front of the property.

Also to be searched are all rooms inside 1321 N Street, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 1321 N Street, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **G.PIERSON RESIDENCE** includes the person of Gary PIERSON (year of birth 1981), if located at the **G.PIERSON RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-3

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and ammunition); and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **G.PIERSON RESIDENCE**, as that location is defined in ATTACHMENT A-3:

a. Indicia of occupancy, residency, control and/or ownership of the **G.PIERSON RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;

b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;

c. Ammunition of all types and calibers;

d. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

e. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

f. Documents, records, pieces of paper, and other items, including photographs, reflecting gang members’ names, initials, monikers, gang slogans, gang logos, or containing

mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/electronic form;

g. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use “W,” “CT,” and “NY,” as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

h. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

i. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

j. Bank account records, wire transfer records, bank statements, safe deposit box keys and records, money containers, money counters, financial records and notes, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the racketeering activity, such as robbery or the sale of controlled substances;

k. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

l. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

m. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of racketeering

activities such as robbery or drug trafficking;

n. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(m) above;

o. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

p. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

q. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

r. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

s. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

t. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

u. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files;

cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

v. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

w. As used herein, the terms “records,” “documents,” “programs,” “applications,” “photographs,” and “materials” include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

x. As used herein, the term “digital device” includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.

ATTACHMENT A-4

The location to be searched has the physical address of 3030 Verde Street, Apartment #19, Bakersfield, California (hereinafter, the “**K.PIERSON’s and T.THOMAS’s RESIDENCE**”). The residence is a two toned two story building with tan over brown coloring. The roof is green in color and is composed of composition shingles. Apartment #19 is located on the second story at the top of switch back stairwell. The door faces to the east and is secured with a white security door. The number 19 is posted in white approximate 3 inch lettering on the door which is also white in color. Apartment #20 is located directly to the east of apartment #19 and its door faces west. The building containing apartment #19 is located in the northwest portion of the apartment complex and is the northern most building on the driveway entrance off of Verde Street.

Also to be searched are all rooms inside 3030 Verde Street, Apartment #19, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 3030 Verde Street, Apartment #19, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **K.PIERSON’s and T.THOMAS’s RESIDENCE** includes the person of Kristi PIERSON (year of birth 1986) and Tommie THOMAS (year of birth 1982), if located at the **K.PIERSON’s and T.THOMAS’s RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-4

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to possess with intent to distribute, and to distribute, methamphetamine, and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **K.PIERSON's and T.THOMAS's Residence**, as that location is defined in ATTACHMENT A-4:

a. Indicia of occupancy, residency, control and/or ownership of the **K.PIERSON's and T.THOMAS's Residence** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;

b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;

c. Ammunition of all types and calibers;

d. Any controlled substance, including but not limited to: methamphetamine, cocaine, heroin, steroids, marijuana, or tetrahydrocannabinol ("THC") in any form;

e. Paraphernalia commonly associated with the manufacture and packaging for sale or the transportation of controlled substances, including cutting agents and diluents, chemical testing devices, packaging materials such as glycine or plastic bags, tupperware, cellophane, heat sealers, triple beam scales and other weighing devices, measuring devices, strainers, boxes, and scientific grade beakers;

f. Cash over \$1,000

g. Items used in the packaging of currency for consolidation and transportation, such as money counting machines, money wrappers, rubber bands, duct or wrapping tape, and plastic sealing machines;

h. Bank account records, wire transfer records, bank statements, safe deposit box

keys and records, money containers, financial records and notes, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the sale of controlled substances;

i. Drug or money ledgers, drug distribution or customer lists, correspondence, notations, logs, receipts, journals, books, records and other documents, which were created, modified, or stored in any form, including on any digital device, and which indicate the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed;

j. Personal telephone books, address books, telephone bills, photographs, letters, cables, telegrams, facsimiles, personal notes, documents and other items, which were created, modified, or stored in any form, including on any digital device, and which reflect contact information, names, addresses, telephone numbers, or any other personal information of participants in narcotics trafficking activities, including suppliers, distributors and customers;

k. Records of off-site storage locations, including safe deposit box keys, records, receipts and rental agreements for storage facilities;

l. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

m. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

n. Documents, records, pieces of paper, and other items, including photographs,

reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/electronic form;

o. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use "W," "CT," and "NY," as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

p. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

q. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

r. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

s. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

t. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of drug trafficking activities or racketeering activities such as robbery;

u. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to

commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(t) above;

v. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

w. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others

to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms “records,” “documents,” “programs,” “applications,” “photographs,” and “materials” include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term “digital device” includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.

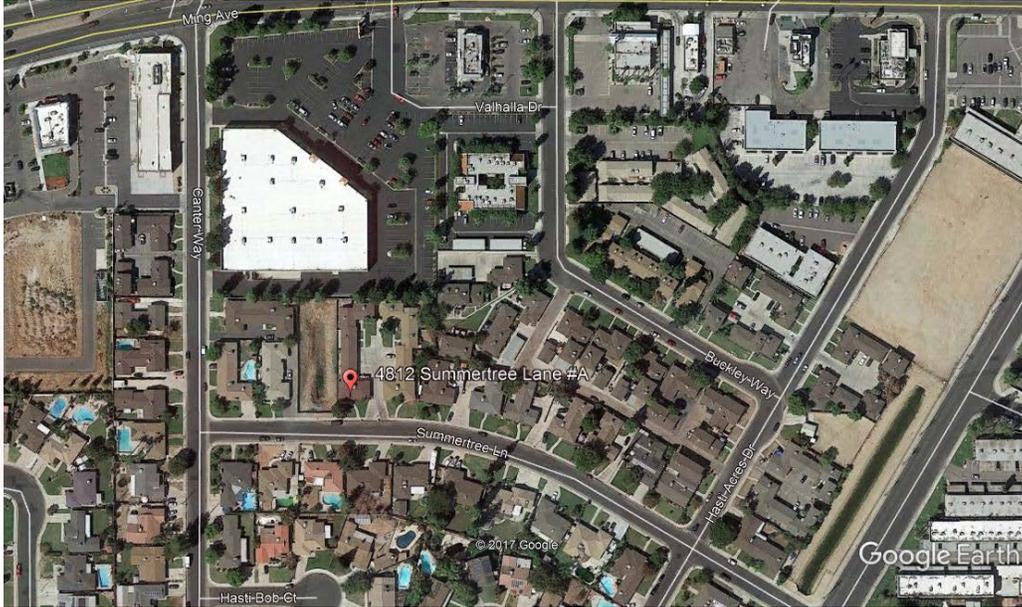
ATTACHMENT A-5

The location to be searched has the physical address of 4812 Summertree Lane, Apt. #A, Bakersfield, California (hereinafter, the “**JONES RESIDENCE**”). The residence is a multi-unit apartment complex on the north side of Summertree Lane, west of Canter Way. Apartment #A is located at the front of the complex, and it is the only apartment facing Summertree Lane within this complex. The building is composed light blue stucco with white trim and they have a brown composite shingle roof. The numbers “4812” are black in color and are affixed to the roof trim over the front door of apartment #A. The letter “A” is not directly visible from the street but is posted within the front door cove. There is a white security screen door on the front door, a back patio with a wooden fence and an attached 2 car garage.

Also to be searched are all rooms 4812 Summertree Lane, Apt. #A, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 4812 Summertree Lane, Apt. #A, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **JONES RESIDENCE** includes the person of Ladaireus JONES (year of birth 1993), if located at the **JONES RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-5

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and ammunition), and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy), and Title 18 U.S.C § 924(c)(using a firearm in furtherance of a drug trafficking crime/crime of violence) will be found at the **JONES RESIDENCE**, as that location is defined in ATTACHMENT A-5:

- a. Indicia of occupancy, residency, control and/or ownership of the **JONES RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;
- b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;
- c. Ammunition of all types and calibers;
- d. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;
- e. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;
- f. Documents, records, pieces of paper, and other items, including photographs,

reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/electronic form;

g. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use "W," "CT," and "NY," as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

h. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/electronic form;

i. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

j. Bank account records, wire transfer records, bank statements, safe deposit box keys and records, money containers, money counters, financial records and notes, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the racketeering activity, such as robbery or the sale of controlled substances;

k. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/electronic form;

l. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

m. Documents and deeds reflecting the purchase or lease of real estate, vehicles,

precious metals and stones, jewelry or other items obtained with the proceeds of racketeering activities such as robbery or drug trafficking;

n. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(m) above;

o. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

p. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set

forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms "records," "documents," "programs," "applications," "photographs," and "materials" include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term "digital device" includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.



ATTACHMENT A-6

The location to be searched has the physical address of 720 Terrace Way, Apartment 17, Bakersfield, California (hereinafter, the “**JONES RESIDENCE**”). The residence is described as being a single-story, apartment complex, located on the east side of South P Street. The apartment complex is separated into two portions, a northern complex and southern complex, by a central parking lot which is accessed from South P Street. The premise is further described as a single-story, single residence apartment, where access to the residences is facilitated by an open courtyard, located to the south of the parking lot. The apartment specified to be searched is located in the southern complex, located to the north side of the south courtyard. The apartment to be search has a tan stucco exterior, with brown trim, brown composite roof, and a south facing front door, which is white in color. The numbers “17” are observed on the right side of the doorway, four inches in height and black in color. The premise’s perimeter for the apartment complex of 720 Terrace Way is contained by a wrought iron security fence, with a security gate that allows access into the premise on the west side of complex. The front of the residence is on the south side of the structure that is located immediately to the south of a central parking lot, which is located in the middle of the premise for 720 Terrace Way. The property’s premise is bordered by an elevated freeway, on the north side of the apartment complex. The premise is the first property north of Terrace Way, on the east side of the South P Street.

Also to be searched are all rooms 720 Terrace Way, Apartment 17, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 720 Terrace Way, Apartment 17, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **JONES RESIDENCE** includes the person of Ladaireus JONES

(year of birth 1993), if located at the **JONES RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-6

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and ammunition), and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy), and Title 18 U.S.C § 924(c)(using a firearm in furtherance of a drug trafficking crime/crime of violence) will be found at the **JONES RESIDENCE**, as that location is defined in ATTACHMENT A-5:

- a. Indicia of occupancy, residency, control and/or ownership of the **JONES RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;
- b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;
- c. Ammunition of all types and calibers;
- d. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;
- e. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;
- f. Documents, records, pieces of paper, and other items, including photographs,

reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/electronic form;

g. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use "W," "CT," and "NY," as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

h. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/electronic form;

i. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

j. Bank account records, wire transfer records, bank statements, safe deposit box keys and records, money containers, money counters, financial records and notes, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the racketeering activity, such as robbery or the sale of controlled substances;

k. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/electronic form;

l. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

m. Documents and deeds reflecting the purchase or lease of real estate, vehicles,

precious metals and stones, jewelry or other items obtained with the proceeds of racketeering activities such as robbery or drug trafficking;

n. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(m) above;

o. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

p. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set

forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms "records," "documents," "programs," "applications," "photographs," and "materials" include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term "digital device" includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.



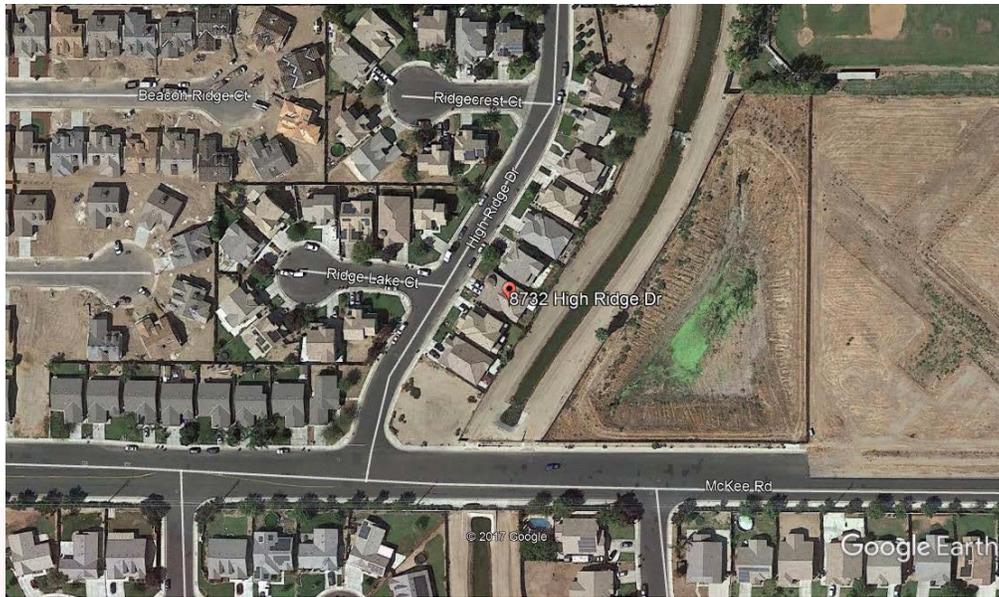
ATTACHMENT A-7

The location to be searched has the physical address of 8732 High Ridge Drive, Bakersfield, California (hereinafter, the “**P.DEAN RESIDENCE**”). The residence is a single family, two-story, residence on the east side of High Ridge Drive and the front door faces to the west. It is the 3rd house north of McKee Road. It has an attached 2 car garage with a gray garage door. The numbers “8732” are black in color affixed to a raised lighted box, to the right of the garage door. The residence is composed of beige stucco with gray trim and it has a brown tile roof. Additionally, it has a gray brick façade around the lower portion of the front of the house.

Also to be searched are all rooms inside 8732 High Ridge Drive, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 8732 High Ridge Drive, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **P.DEAN RESIDENCE** includes the person of Paul DEAN (year of birth 1973), if located at the **P.DEAN RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-7

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to possess with intent to distribute, and to distribute, heroin and cocaine, and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **P.DEAN Residence**, as that location is defined in ATTACHMENT A-7:

- a. Indicia of occupancy, residency, control and/or ownership of the **P.DEAN Residence** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;
- b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;
- c. Ammunition of all types and calibers;
- d. Any controlled substance, including but not limited to: methamphetamine, cocaine, heroin, steroids, marijuana, or tetrahydrocannabinol (“THC”) in any form;
- e. Paraphernalia commonly associated with the manufacture and packaging for sale or the transportation of controlled substances, including cutting agents and diluents, chemical testing devices, packaging materials such as glycine or plastic bags, tupperware, cellophane, heat sealers, triple beam scales and other weighing devices, measuring devices, strainers, boxes, and scientific grade beakers;
- f. Cash over \$1,000
- g. Items used in the packaging of currency for consolidation and transportation, such as money counting machines, money wrappers, rubber bands, duct or wrapping tape, and plastic sealing machines;
- h. Bank account records, wire transfer records, bank statements, safe deposit box keys and records, money containers, financial records and notes, which were created, modified,

or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the sale of controlled substances;

i. Drug or money ledgers, drug distribution or customer lists, correspondence, notations, logs, receipts, journals, books, records and other documents, which were created, modified, or stored in any form, including on any digital device, and which indicate the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed;

j. Personal telephone books, address books, telephone bills, photographs, letters, cables, telegrams, facsimiles, personal notes, documents and other items, which were created, modified, or stored in any form, including on any digital device, and which reflect contact information, names, addresses, telephone numbers, or any other personal information of participants in narcotics trafficking activities, including suppliers, distributors and customers;

k. Records of off-site storage locations, including safe deposit box keys, records, receipts and rental agreements for storage facilities;

l. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

m. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips ("WSC"), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

n. Documents, records, pieces of paper, and other items, including photographs, reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing

mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/ electronic form;

o. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use “W,” “CT,” and “NY,” as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

p. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

q. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

r. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

s. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

t. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of drug trafficking activities or racketeering activities such as robbery;

u. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or

store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(t) above;

v. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

w. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others

to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms “records,” “documents,” “programs,” “applications,” “photographs,” and “materials” include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term “digital device” includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.

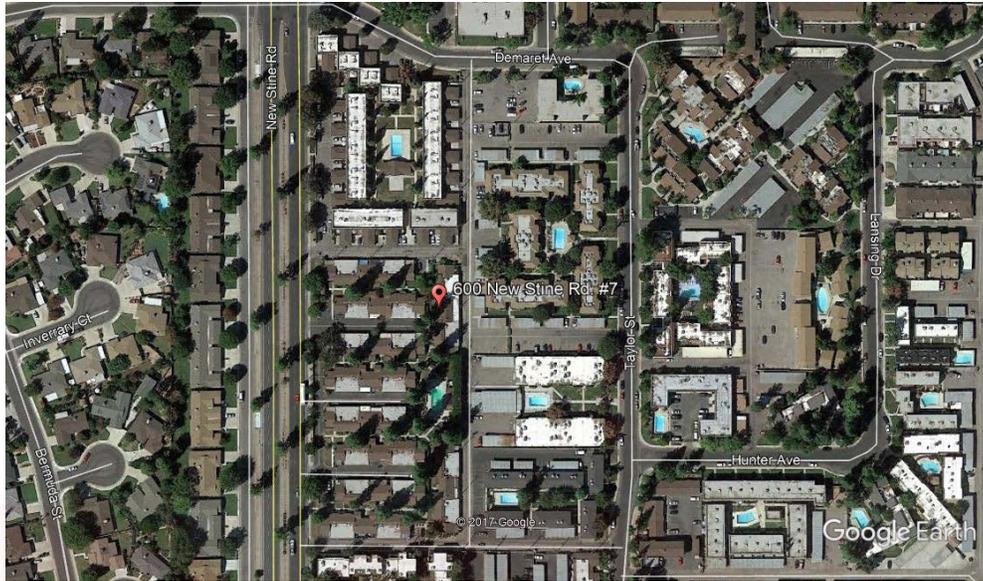
ATTACHMENT A-8

The location to be searched has the physical address of 600 New Stine Road #7, Bakersfield, California (hereinafter, the "**P.DEAN RESIDENCE**"). The residence is a multi-unit apartment complex on the east side of New Stine Road, between Gorham Way to the south and Demaret Avenue to the north. Apartment #7 is located near the middle of the northeastern row of apartment units within this complex which runs north to south. The front door is in a small common patio cove shared with apartment #6. This patio cove faces west. Each unit has an attached garage at its rear and an enclosed patio with alley access and the garage door faces east. The buildings are composed of beige stucco with brown trim and they have a brown composite shingle roof. The number "7" is gold in color and is affixed to the window trim to the left of the front door.

Also to be searched are all rooms inside 600 New Stine Road #7, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 600 New Stine Road #7, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **P.DEAN RESIDENCE** includes the person of Paul DEAN (year of birth 1973), if located at the **P.DEAN RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-8

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 21 U.S.C. § 846, 841(a)(1), conspiracy to possess with intent to distribute, and to distribute, heroin and cocaine, and 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **P.DEAN Residence**, as that location is defined in ATTACHMENT A-8:

- a. Indicia of occupancy, residency, control and/or ownership of the **P.DEAN Residence** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;
- b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;
- c. Ammunition of all types and calibers;
- d. Any controlled substance, including but not limited to: methamphetamine, cocaine, heroin, steroids, marijuana, or tetrahydrocannabinol (“THC”) in any form;
- e. Paraphernalia commonly associated with the manufacture and packaging for sale or the transportation of controlled substances, including cutting agents and diluents, chemical testing devices, packaging materials such as glycine or plastic bags, tupperware, cellophane, heat sealers, triple beam scales and other weighing devices, measuring devices, strainers, boxes, and scientific grade beakers;
- f. Cash over \$1,000
- g. Items used in the packaging of currency for consolidation and transportation, such as money counting machines, money wrappers, rubber bands, duct or wrapping tape, and plastic sealing machines;
- h. Bank account records, wire transfer records, bank statements, safe deposit box keys and records, money containers, financial records and notes, which were created, modified,

or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, or movement of money generated from the sale of controlled substances;

i. Drug or money ledgers, drug distribution or customer lists, correspondence, notations, logs, receipts, journals, books, records and other documents, which were created, modified, or stored in any form, including on any digital device, and which indicate the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed;

j. Personal telephone books, address books, telephone bills, photographs, letters, cables, telegrams, facsimiles, personal notes, documents and other items, which were created, modified, or stored in any form, including on any digital device, and which reflect contact information, names, addresses, telephone numbers, or any other personal information of participants in narcotics trafficking activities, including suppliers, distributors and customers;

k. Records of off-site storage locations, including safe deposit box keys, records, receipts and rental agreements for storage facilities;

l. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

m. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips ("WSC"), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

n. Documents, records, pieces of paper, and other items, including photographs, reflecting gang members' names, initials, monikers, gang slogans, gang logos, or containing

mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/ electronic form;

o. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use “W,” “CT,” and “NY,” as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

p. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

q. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

r. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

s. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

t. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of drug trafficking activities or racketeering activities such as robbery;

u. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or

store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(t) above;

v. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

w. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others

to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms “records,” “documents,” “programs,” “applications,” “photographs,” and “materials” include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term “digital device” includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.

ATTACHMENT A-9

The location to be searched has the physical address of 6105 Ringsdale Court, Bakersfield, California (hereinafter, the “**L.THOMAS RESIDENCE**”). Rockford Ave t- intersects with Ringsdale Ct, at which point Ringsdale Ct. has a cul-de-sac street to the north and the south of the intersection. 6105 Ringsdale Court is located at the northwest corner of the north side cul-de-sac from Rockford Ave. 6105 Ringsdale Court. is further described as a single story residential structure, composed of tan colored stucco exterior, with red brick façade on the lower 3 feet of the front of the house, brown fascia board trim, and brown asphalt shingle roofing. The front door to the residence; faces in a southeasterly direction, red in color with a brass plate near the bottom and is visible from Ringsdale Court. The residence has a vehicle driveway located along the north side of the property and is accessible from Ringsdale Court. The driveway leads to a two car garage, which has a white rollup garage door. The numbers (6105); are affixed to the fascia board above the left side of the garage. No front yard fence was visible at the residence; however the north and south sides of the property are secured by 6 foot wood fencing, which restricts access to the backyard.

Also to be searched are all rooms inside 6105 Ringsdale Court, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 6105 Ringsdale Court, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **L.THOMAS RESIDENCE** includes the person of Larry THOMAS (year of birth 1993), if located at the **L.THOMAS RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-9

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C § 922(g)(1) (Felon in possession of a firearm), 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy), and 18 U.S.C. § 1343 (Wire Fraud) will be found at the **L.THOMAS RESIDENCE**, as that location is defined in ATTACHMENT A-9:

a. Indicia of occupancy, residency, control and/or ownership of the **L.THOMAS RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;

b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;

c. Ammunition of all types and calibers;

d. Documents or items related to wire fraud and or money laundering, including bank account records, wire transfer records, bank statements, mail, safe deposit box keys and records, money containers, financial records and notes, any receipt or document related to a Money Service Business, Wire Transfer Service such as Walmart2Walmart, Western Union, or Banking, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, movement of money; in hard copy or digital/ electronic form.

e. Financial instruments purchased with large amounts of currency, including travelers checks, bonds, stock certificates, money orders and cashier's checks, passbooks, bank checks, bank deposit tickets, certificates of deposit, and memoranda and other items showing evidence of the acquisition, secretion, transfer, concealment, and/or expenditures of money;

f. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses,

camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

g. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

h. Documents, records, pieces of paper, and other items, including photographs, reflecting gang members’ names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/ electronic form;

i. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use “W,” “CT,” and “NY,” as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

j. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

k. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

l. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

m. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

n. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of wire fraud or racketeering activities such as robbery;

o. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(n) above;

p. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

q. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

r. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

v. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

w. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

x. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

y. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

aa. As used herein, the terms "records," "documents," "programs," "applications," "photographs," and "materials" include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

bb. As used herein, the term "digital device" includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras;

peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.



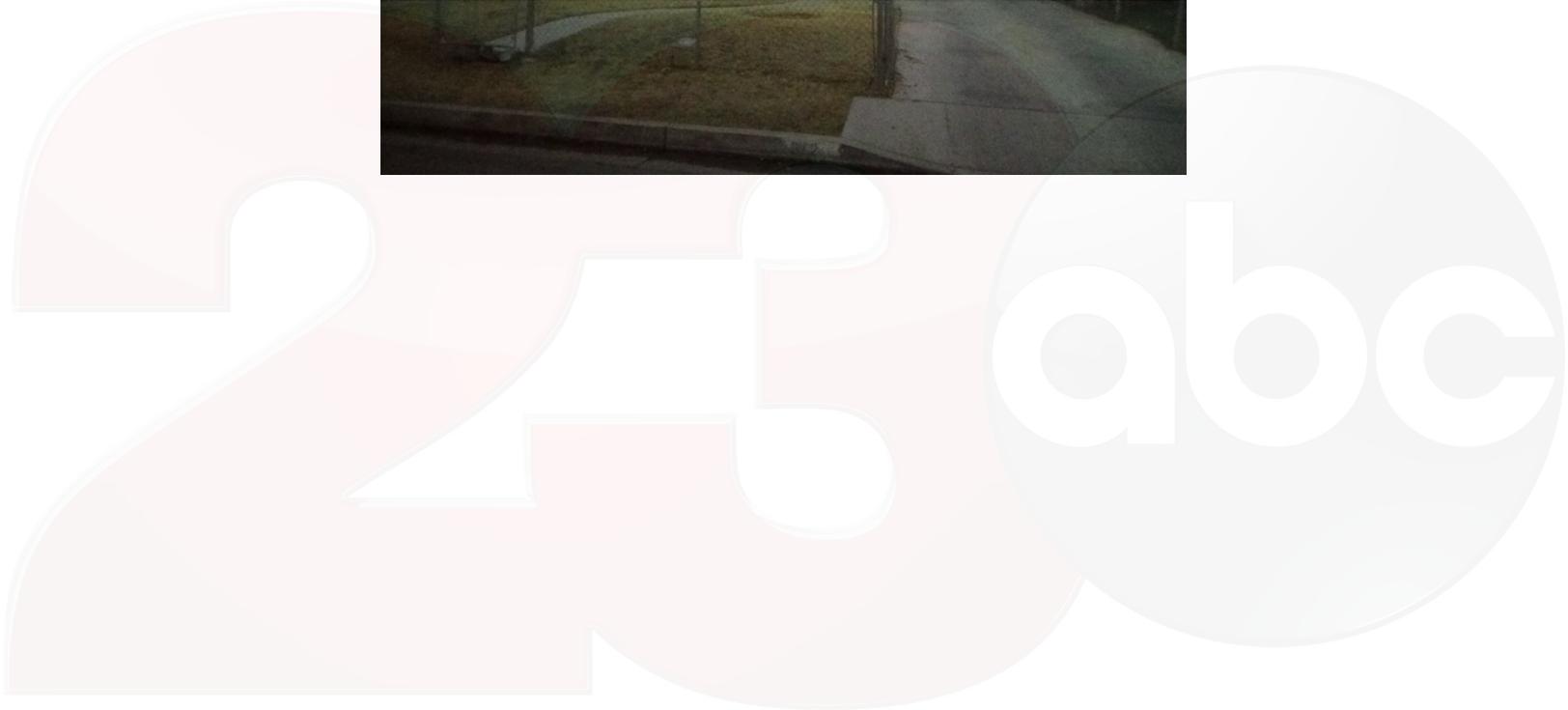
ATTACHMENT A-10

The location to be searched has the physical address of 612 El Sereno Drive, Bakersfield, California (hereinafter, the "**L.THOMAS RESIDENCE**"). The residence is located on the east side of El Sereno Dr. and is the (5th) fifth residence south of Townsley Ave. 612 El Sereno Dr. is further described as a single story residential structure, composed of gray colored horizontal lap siding exterior, white trim, and light gray asphalt shingle roofing. The front door to the residence is located under a covered front porch; faces in a southerly direction, is concealed behind a black security screen door and is visible from El Sereno Dr. The residence has a vehicle driveway located along the south side of the property and is accessible from El Sereno Dr. The driveway leads to a detached two car garage size building; although no vehicle garage door is visible, has gray colored lap siding, white trim and light gray colored asphalt shingle roofing. The numbers "612" are painted on the curb, to the left of the driveway and are visible from El Sereno Dr. A 4 foot tall see thru metal chain link fence, equipped with a pedestrian gate secures the front yard, however the driveway to the residence was unsecured and allowed access to the detached building at the end of the driveway and backyard of the residence.

Also to be searched are all rooms 612 El Sereno Drive, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 612 El Sereno Drive, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **L.THOMAS RESIDENCE** includes the person of Larry THOMAS (year of birth 1993), if located at the **L.THOMAS RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-10

ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C § 922(g)(1) (Felon in possession of a firearm), 18 U.S.C. § 1962(c), (d) (Racketeer Influenced and Corrupt Organizations/Conspiracy), and 18 U.S.C. § 1343 (Wire Fraud) will be found at the **L.THOMAS RESIDENCE**, as that location is defined in ATTACHMENT A-10:

a. Indicia of occupancy, residency, control and/or ownership of the **L.THOMAS RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;

b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;

c. Ammunition of all types and calibers;

d. Documents or items related to wire fraud and or money laundering, including bank account records, wire transfer records, bank statements, mail, safe deposit box keys and records, money containers, financial records and notes, any receipt or document related to a Money Service Business, Wire Transfer Service such as Walmart2Walmart, Western Union, or Banking, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, movement of money; in hard copy or digital/ electronic form.

e. Financial instruments purchased with large amounts of currency, including travelers checks, bonds, stock certificates, money orders and cashier's checks, passbooks, bank checks, bank deposit tickets, certificates of deposit, and memoranda and other items showing evidence of the acquisition, secretion, transfer, concealment, and/or expenditures of money;

f. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses,

camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

g. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

h. Documents, records, pieces of paper, and other items, including photographs, reflecting gang members’ names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/ electronic form;

i. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use “W,” “CT,” and “NY,” as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

j. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

k. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

l. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

m. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

n. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds of wire fraud or racketeering activities such as robbery;

o. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(n) above;

p. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

q. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

r. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

v. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

w. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

x. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

y. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

aa. As used herein, the terms "records," "documents," "programs," "applications," "photographs," and "materials" include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

bb. As used herein, the term "digital device" includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras;

peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.



ATTACHMENT A-11

The location to be searched has the physical address of 701 T Street, Bakersfield, California (hereinafter, the “**ALLEN RESIDENCE**”). This residence is located along the northwest corner of T Street and 7th Street. and further described as a single story residential structure, composed of beige colored wood siding exterior, white trim, and light gray asphalt shingle roofing. The front door to the residence faces in an easterly direction toward T Street and is visible from T Street. The residence has a vehicle driveway located along the southwest corner of the property and is accessible from 7th Street. The numbers “701” are gold in color; horizontally attached along the exterior siding, to the right of the front door and is visible from T Street. The front door to the residence is concealed behind a white security screen door. The front yard of the residence does not have a fence, although the backyard of the residence has a 4 foot chain link fence, which is located along 7th Street. A sliding chain link gate is also located along 7th Street which is accessible from 7th Street.

A detached single car size shed is also located to the rear of the residence and can be accessed from the sliding chain link gate on 7th Street. The shed door faces to the south and is visible from 7th Street.

Also to be searched are all rooms inside 701 T Street, Bakersfield, California, and any safes, storage containers, trash bins, or other locations evidence could be concealed. Also to be searched are any outbuildings, garages, and storage containers located on the property and associated with 701 T Street, Bakersfield, California.

Also to be searched are vehicles directly associated with the residence ie: vehicles parked in the driveway or alley behind the residence or vehicles parked near the residence that are believed to be associated with the residence based on documents or property recovered inside the residence.

Also to be searched, the **ALLEN RESIDENCE** includes the person of Bryshanique ALLEN (year of birth 1996), if located at the **ALLEN RESIDENCE** at any time during the execution of this search warrant.



ATTACHMENT B-11
ITEMS TO BE SEIZED

1. There is probable cause to believe that evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C. § 1956(a)(1) (money laundering), 18 U.S.C. § 1959 (Violent Crime in Aid of Racketeering), and 18 U.S.C. § 1962(c),(d) (Racketeer Influenced and Corrupt Organizations/Conspiracy) will be found at the **ALLEN RESIDENCE**, as that location is defined in ATTACHMENT A-11:

- a. Indicia of occupancy, residency, control and/or ownership of the **ALLEN RESIDENCE** and things described in this warrant, such as utility bills, telephone bills, loan payment receipts, rent documents, canceled envelopes and keys, photographs, and bank records;
- b. Firearms whether fully assembled or disassembled as well as evidence of firearms ownership and possession, firearms parts, and firearms accessories such as magazines, grips, scopes, holsters, cleaning kits;
- c. Ammunition of all types and calibers;
- d. Documents related to money laundering, including bank account records, wire transfer records, bank statements, mail, safe deposit box keys and records, money containers, financial records and notes, any receipt or document appearing to be related to a Money Service Business, Wire Transfer Service such as Walmart2Walmart, Western Union, or Banking, which were created, modified, or stored in any form, including on any digital device, and which show payment, receipt, concealment, transfer, movement of money; in hard copy or digital/ electronic form.
- e. Financial instruments purchased with large amounts of currency, including travelers checks, bonds, stock certificates, money orders and cashier's checks, passbooks, bank checks, bank deposit tickets, certificates of deposit, and memoranda and other items showing evidence of the acquisition, secretion, transfer, concealment, and/or expenditures of money;
- f. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses,

camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity, in hard copy or digital/electronic form;

g. Documents, records, pieces of paper, and other items, including photographs, pertaining to membership in and/or association with the West Side Crips (“WSC”), including photographs/writings displaying gang hand signs, firearms, graffiti, large amounts of currency, narcotics, and other contraband, photographs of WSC members and their associates posing next to vehicles, photographs of WSC members and their associates at known gang hangouts, in hard copy or digital/ electronic form;

h. Documents, records, pieces of paper, and other items, including photographs, reflecting gang members’ names, initials, monikers, gang slogans, gang logos, or containing mention of street gang membership, affiliation, activity, or identity, in hard copy or digital/ electronic form;

i. Sports memorabilia and attire related to the gang to include the Washington Nationals, New York Yankees, Minnesota Twins, and other sports teams that use “W,” “CT,” and “NY,” as a symbol as well as items of clothing which are turquoise in color or are otherwise related to the gang;

j. Documents, records, pieces of paper, and other items, including scrapbooks or newspaper articles which document and describe crimes committed by or against the WSC and their associates, in hard copy or digital/ electronic form;

k. Documents, records, pieces of paper, and other items reflecting payment to or from WSC members and their associates, in hard copy or digital/electronic form;

l. Documents, records, pieces of paper, and other items constituting personal telephone and address books and listings, letters, telephone bills, photographs of co-conspirators, audio and video tapes, personal notes and other items believed to reflect names, addresses, telephone numbers, communications, and illegal activities of associates in racketeering activities, whether in written or digital/ electronic form;

m. Communications, including voicemails, incoming, outgoing and draft text messages, picture messages, video messages, and incoming and outgoing emails, related to the violations set forth in paragraph 1 above, which were created, modified, or stored in any form, including in digital form on any digital device;

n. Documents and deeds reflecting the purchase or lease of real estate, vehicles, precious metals and stones, jewelry or other items obtained with the proceeds from racketeering activities such as money laundering or robbery;

o. Any digital devices used to facilitate the transmission, creation, display, encoding, or storage of data, including word processing equipment, modems, docking stations, monitors, printers, plotters, encryption devices, and optical scanners that are capable of being used to commit or further the violations set forth in paragraph 1 above, or to create, access, process, or store evidence, contraband, fruits, or instrumentalities of such violations, as set forth in paragraph 1(a)-(n) above;

p. Internet browsing history, user's identifications and passwords for internet websites, evidence of websites visited, and search engine terms used by persons utilizing any digital device seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

q. BIOS settings, registry settings (including "Most Recently Used" keys), directories, file names and properties, user information, application software, operating system(s), and any files in digital devices seized pursuant to this warrant, which relate to the violations set forth in paragraph 1 above;

v. Any documentation, operating logs, and reference manuals regarding the operation of the digital devices to be searched;

w. Any applications, utility programs, compilers, interpreters, and other software used to facilitate direct or indirect communication with the digital devices to be searched;

x. Any physical keys, encryption devices, dongles, or similar physical items which are necessary to gain access to the digital devices to be searched;

y. Any passwords, password files, test keys, encryption codes, or other information necessary to access the digital devices to be searched;

z. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, that show the actual user(s) of the computer or digital device during any time period in which the device was used to commit the crimes set forth in paragraph 1 above, including the web browser's history; temporary Internet files; cookies, bookmarked, or favorite web pages; email addresses used from the digital device to be searched; identifications and/or Internet Protocol addresses used by the digital device to be searched; email, instant messages, and other electronic communications; address books; contact lists; records of social networking and online service usage; and software that would allow others to control the digital device such as viruses, Trojan horses, and other forms of malicious software (or alternatively, the lack of software that would allow others to control the digital device);

aa. All records, documents, programs, applications, or materials created, modified, or stored in any form, including in digital form, on any digital device, that show evidence of counter-forensic programs (and associated data) that are designed to eliminate data from a digital device to be searched

bb. As used herein, the terms "records," "documents," "programs," "applications," "photographs," and "materials" include records, documents, programs, applications, photographs and materials created, modified, or stored in any form, including on any digital device, any internally installed drives or memory data cards in any digital device, and any forensic copies thereof. The terms also include records, documents, programs, applications, photographs and materials that have been deleted from a digital device but that may still be extracted.

cc. As used herein, the term "digital device" includes any magnetic, electronic or optical system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, electronic notebook, and tablet computers; personal digital assistants; memory calculators; electronic dialers; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart phones; digital cameras;

peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media and memory devices, such as hard drives, floppy disks, memory cards, optical disks, magnetic tapes used to store digital data (excluding analog tapes such as VHS), printer or memory buffers, smart cards, and PC cards; and security devices.



Angela Scott
AUSA

Penalties for Criminal Complaint

Defendant: TOMMIE THOMAS

COUNT 1:

VIOLATION: 21 U.S.C. 841(a)(1), (b)(1)(A) (distribution of methamphetamine)

PENALTIES: Mandatory Minimum: 10 years in prison
Maximum life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Mandatory minimum five years of supervised release up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

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