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JAK 4.3. DISTRICT DOURT FUSERS DISTRICT OF CHR OF EVEL 489

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

UNITED STATES OF AMERICA,)	INDIC	TMEN	<u>T</u>	
Plaintiff,)))	JUDGE	15	CR	243
V.)			GE C	WIN
EMERY LEE, aka MULEHEAD,)	CASE NO	Э		
ANGEL PICHARDO-MARTINEZ,)	Title	21, Secti	ons 843(b), 846,
aka MICKEY,)	and a	841(a)(1),	(b)(1)(A)), (B),
LESLY PICHARDO FELIZ,)	(C),	United St	ates Code	•
ANTOINE DORTCH,)	Title	18, Secti	ons 922(g	(1),
AILYSON CLIPPER,)	924(a)(2), and	2, United	States
LEARDRUS BURRIS,)	Code	3		
RONNIE JOHNSON, JR.)				
LARRY SMOOT, aka L,	-)				
KYLE BALLARD,)				-
COLLIE BROOKS,)				
GEORGE LOCKE, JR., aka G,)				
DEMOND BAKER, aka MONTE,)				
TYRONE ALLEN, aka TY,)				
aka LANDLORD,)				
RHONDA COLLINS,)				
SHARAE RAMSEY,)				
DAVID ROBINSON, aka DAWUD,)				
DIVINE DANIELS,)				
ORLANDO REED, aka MEECH,)				
REGINALD BLAIR, aka FLAV,)				
LARRY DIXON,)				
)				

Defendants.

The Grand Jury charges:

Beginning at least as early as September 2010, and continuing through June 30, 2015, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, EMERY LEE, aka MULEHEAD, ANGEL PICHARDO-MARTINEZ, aka MICKEY, LESLY PICHARDO FELIZ, ANTOINE DORTCH, AILYSON CLIPPER, LEARDRUS BURRIS, RONNIE JOHNSON, JR., LARRY SMOOT, aka L, KYLE BALLARD, COLLIE BROOKS, GEORGE LOCKE, JR., aka G, DEMOND BAKER, aka MONTE, TYRONE ALLEN, aka TY, aka LANDLORD, RHONDA COLLINS, SHARAE RAMSEY, DAVID ROBINSON, aka DAWUD, DIVINE DANIELS, ORLANDO REED, aka MEECH, REGINALD BLAIR, aka FLAV, and LARRY DIXON, the defendants herein, "Bolo" (a person known to the Grand Jury named but not charged herein), and others known and unknown to the Grand Jury did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance. As to EMERY LEE, ANGEL PICHARDO-MARTINEZ, and LESLY PICHARDO FELIZ, they conspired to possess with the intent to distribute and to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and 846. As to ANTOINE DORTCH, AILYSON CLIPPER, and LEARDRUS BURRIS, they conspired to possess with the intent to distribute and to

distribute 50 grams or more but less than one kilogram of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and 846. As to RONNIE JOHNSON, JR., LARRY SMOOT, KYLE BALLARD, COLLIE BROOKS, GEORGE LOCKE, JR., DEMOND BAKER, TYRONE ALLEN, RHONDA COLLINS, SHARAE RAMSEY, DAVID ROBINSON, DIVINE DANIELS, ORLANDO REED, REGINALD BLAIR, and LARRY DIXON, they conspired to possess with the intent to distribute and to distribute a mixture and substance containing a detectable amount of cocaine, and a mixture and substance containing a detectable amount of the coin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and 846.

MANNER AND MEANS OF THE CONSPIRACY

- A. It was part of the conspiracy that ANGEL PICHARDO-MARTINEZ and LESLY PICHARDO FELIZ provided quantities of cocaine and heroin to EMERY LEE for further distribution.
- B. It was further part of the conspiracy that DEMOND BAKER provided quantities of cocaine to EMERY LEE for distribution when LEE was unable to obtain cocaine from ANGEL PICHARDO-MARTINEZ.
- C. It was further part of the conspiracy that LEARDRUS BURRIS provided quantities of heroin to ANTOINE DORTCH and AILYSON CLIPPER for distribution.
- D. It was further part of the conspiracy that AILYSON CLIPPER supplied ANTOINE DORTCH's drug customers when DORTCH was unavailable.
- E. It was further part of the conspiracy that ANTOINE DORTCH, AILYSON CLIPPER, RONNIE JOHNSON, JR., and others provided quantities of heroin to EMERY LEE for distribution.

- F. It was further part of the conspiracy that EMERY LEE provided heroin to DAVID ROBINSON, RHONDA COLLINS, TYRONE ALLEN, SHARAE RAMSEY, ORLANDO REED, REGINALD BLAIR, LARRY SMOOT, DIVINE DANIELS, and others for distribution.
- G. It was further part of the conspiracy that EMERY LEE provided cocaine to REGINALD BLAIR, LARRY SMOOT, DAVID ROBINSON, COLLIE BROOKS, ORLANDO REED, GEORGE LOCKE, JR., DIVINE DANIELS, DEMOND BAKER, KYLE BALLARD, LARRY DIXON, and others for distribution.
- H. It was further part of the conspiracy that EMERY LEE, ANGEL PICHARDO-MARTINEZ, LESLY PICHARDO FELIZ, and others had their drug customers use code to order cocaine and heroin in an effort to thwart law enforcement.
- I. It was further part of the conspiracy that DIVINE DANIELS middled heroin purchases between AILYSON CLIPPER and EMERY LEE.
- J. It was further part of the conspiracy that RHONDA COLLINS and SHARAE RAMSEY assisted EMERY LEE in selling heroin to drug customers.
- K. It was further part of the conspiracy that EMERY LEE middled cocaine purchases for KYLE BALLARD and DEMOND BAKER.
- L. It was further part of the conspiracy that DEMOND BAKER, COLLIE BROOKS, REGINALD BLAIR, DAVID ROBINSON, LARRY SMOOT, ORLANDO REED, and others pooled their money with EMERY LEE to purchase larger amounts of cocaine and heroin.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy, the defendants and others performed the following acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

- On or about September 17, 2010, REGINALD BLAIR distributed approximately
 6.2 grams of heroin to a confidential source in Akron, Ohio.
- On or about September 28, 2010, REGINALD BLAIR distributed approximately
 grams of heroin to a confidential source in Akron, Ohio.
- 3. On or about April 16, 2013, EMERY LEE distributed approximately 7 grams of heroin for \$700 to a confidential source in Akron, Ohio.
- 4. On or about May 29, 2013, REGINALD BLAIR distributed approximately 123 grams of cocaine for approximately \$5,000 to a confidential source in Akron, Ohio.
- 5. On or about January 28, 2014, EMERY LEE distributed approximately 12 grams of cocaine for approximately \$600 to a confidential source in Akron, Ohio.
- 6. On or about August 6, 2014, EMERY LEE distributed approximately 14 grams of heroin for approximately \$1,400 to a confidential source in Akron, Ohio.
- 7. On or about August 6, 2014, EMERY LEE distributed approximately 12.64 grams of cocaine for approximately \$700 to a confidential source in Akron, Ohio.
- 8. On or about September 22, 2014, at approximately 7:34 p.m., ORLANDO REED called EMERY LEE on the telephone. LEE answered, "Yeah Meech." REED said, "Head?" LEE said, "Yeah." REED responded, "Shit. I'm near you. I'm ready (REED was ready to purchase drugs)." LEE said, "Ok but guess what? I'll meet you, you got to meet me on Orlando. I got like a pool (1/8 an ounce of cocaine) right now. You can get that pool, but I'm getting some more, man. So, so, ah, I'm pretty sure they on their way, but I'll meet you on Orlando. You're going to have to make it a hit and quit." REED said, "I'm right here." LEE said, "I got a pool man, made up." REED said, "I'm right here." LEE said, "I'll be there in a minute."

- 9. On or about September 25, 2014, at approximately 1:37 p.m., TYRONE ALLEN called EMERY LEE on the telephone. During the conversation, ALLEN said, "Well listen here. I need two of them things, (two grams of heroin), man." After discussion, LEE said, "I'm at Copley News right now." ALLEN said, "Yeah, because you know, dude (drug customer) need me now because everybody gone (other suppliers were out of drugs)." LEE said, "Right. Right." ALLEN said, "You remember how you let me get my funk up before, right?" LEE said, "Right. Right." ALLEN said, "I'm the only one dealing with this dude, right? ... Don't mess this up, man." LEE said, "Alright. Ok."
- 10. On or about September 25, 2014, at approximately 2:32 p.m., EMERY LEE called SHARAE RAMSEY on the telephone. During the conversation, RAMSEY said, "Oh Dad, I only got three (three grams of heroin) left." LEE said, "For real?" RAMSEY said, "For real." LEE said, "Damn. Alright. Ok."
- 11. On or about September 25, 2014, at approximately 9:23 p.m., COLLIE BROOKS called EMERY LEE on the telephone. During the conversation, LEE said, "I'm waiting on them (drug suppliers) now. But you know what? If you got that (money to purchase heroin), I can use it when they (drug suppliers) do come. If you ain't got it, don't worry about it. I'll just see you either way. It's going. I'm going to see you. But, um ..." BROOKS said, "I got it. I got it." LEE said, "... I'll stop over there on the way back. But, like I say, as soon as it touch down (LEE receives drugs), you and my son (KYLE BALLARD) are going to be the first one anyway." BROOKS said, "Ok. Ah, yeah, I ain't did nothing. I was, you know, waiting on you." LEE said, "Ok. I'll be over there."
- 12. On or about September 26, 2014, at approximately 9:22 a.m., TYRONE ALLEN called EMERY LEE on the telephone. During the conversation, ALLEN asked, "You going to

put that one thing (amount of heroin) aside for me, so I can get it?" LEE responded, "Yeah. Yeah. ... I can leave it with Rhonda (RHONDA COLLINS) if you want me to. She said she's coming to the west side." ALLEN later asked, "What's my ticket (how much did ALLEN owe LEE)?" LEE said, "Fifty cent (\$50), Ty."

- 13. On or about September 26, 2014, at approximately 11:07 a.m., RHONDA COLLINS called EMERY LEE on the telephone. During the conversation, COLLINS said, "You forgot to give me that (heroin) for Ty (TYRONE ALLEN)." LEE said, "Oh shit. God damn it. Well, I got it on me, man. I promise I'll stop that way when I leave from out here." COLLINS said, "Oh lord. He's trippin. Can you call him right now?" LEE said, "Alright. Bye."
- 14. On or about September 26, 2014, at approximately 3:31 p.m., KYLE BALLARD called EMERY LEE on the telephone. BALLARD said, "What up, Pop?" LEE said, "Nothing. Who's this? Kyle?" BALLARD said, "Yeah." LEE said, "I was just fitting to call you, man. Listen, I don't know who you gave this shit to. I swear to God, man. It's sad. It's not no f***ing nine (ranking the quality of the cocaine). And man, what the f*** is on this shit (the cocaine is of bad quality), man. This is not what I gave you." BALLARD said, "Nothing, Dad." LEE said, "This is not what I gave you, man. C'mon, man."
- 15. On or about September 26, 2014, at approximately 3:51 p.m., ORLANDO REED called EMERY LEE on the telephone. During the conversation, LEE said, "I was just letting you know, yeah ah, hopefully we will be (supplied with drugs). It's crazy. It's crazy, yeah. Yeah. But no, I was just saying, I'm trying to piece up everything, get everything together for when it do. But anyway, ah, ah, that's what I was speaking on. So, ah, yeah, ah it shouldn't be too much more longer, man (LEE would be able to supply REED with drugs soon)." REED

said, "Shit. You ain't got no St. Bernard (heroin) either, do you?" LEE said, "Huh?" REED said, "No St. Bernard (heroin)?" LEE said, "Oh, no. Hell no. Not a thing." REED said, "Ok."

- 16. On or about September 26, 2014, at approximately 7:23 p.m., LARRY DIXON called EMERY LEE on the telephone. DIXON said, "I ain't getting, that shit (cocaine) didn't even come back (cocaine did not cook into crack), man. I, I, that didn't even come back." LEE said, "Ok. That's all I need to know. If you're telling me, you're telling me that Kyle (KYLE BALLARD) f**ed with it (added something to the cocaine) then. That's all I needed to know."
- 17. On or about September 30, 2014, at approximately 3:08 p.m., EMERY LEE called ORLANDO REED on the telephone. LEE said, "Now when it jumps (when LEE gets drugs to sell), man, you already know it, where we at right now?" REED said, "Yeah, I already got you to the side (REED put money aside to purchase drugs from LEE). I'm waiting on you." LEE said, "Alright. Got you."
- 18. On or about October 1, 2014, at approximately 9:23 a.m., COLLIE BROOKS called EMERY LEE on the telephone. During the conversation, LEE said, "I talked to her (LESLY PICHARDO FELIZ). It's supposed to be today (LEE would get supplied with cocaine). Ok?" BROOKS said, "I was going to say, you know, what we got to do, man?" LEE said, "Yeah, yeah, yeah. I talked to her. She, ah, she said it should be today." BROOKS said, "Ok."
- 19. On or about October 1, 2014, at approximately 9:46 p.m., EMERY LEE called TYRONE ALLEN on the telephone. During the conversation, LEE asked, "Hey, ah, you know anybody that got a shorty (1/4 ounce of heroin), or half of a shorty (1/8 ounce of heroin)?"

 ALLEN asked, "What you mean?" LEE said, "A half, ah, you know, shooting some pool (1/8)

ounce of heroin)." ALLEN said, "Yeah." LEE said, "Ok. I'm going to need one. If you can get it, snatch it and I'll come by and get it. I'm going to the house right now though, ok?"

- 20. On or about October 2, 2014, at approximately 10:49 a.m., ORLANDO REED called EMERY LEE on the telephone. LEE said, "I was just fitting to call you. It's all crack a lackin' man (LEE had drugs to sell)." REED said, "Ok, shit ah." LEE said, "I'm on my way west, man. I'm on my way west." REED said, "Alright, yep."
- 21. On or about October 2, 2014, at approximately 11:01 a.m., COLLIE BROOKS called EMERY LEE on the telephone. LEE said, "It's crack a lacking, crack a lacking, man (LEE had cocaine for sale)." BROOKS said, "Ok. Ok, ah, I'm heading to Ravenna. I got to take my girl to the doctor." LEE said, "Just call me. Just call me when you get back." BROOKS said, "Ok."
- 22. On or about October 2, 2014, at approximately 7:02 p.m., SHARAE RAMSEY called EMERY LEE on the telephone. RAMSEY said, "Hey Dad, you got seven of them (seven grams of heroin) on you?" LEE responded, "Ah, ah, ah, somebody there or something?" RAMSEY said, "Forty (drug customer) wants the same as earlier." LEE said, "Ok, I'll be there. Where he at right now?" RAMSEY said, "I'm at home." LEE asked, "Where he at?" RAMSEY said, "I don't know. I told him I was going to call you. ... If I can just pull up on you real quick and grab it for (UI)." LEE said, "Ok. They, they ain't ready (LEE did not have the heroin ready for sale). ... I got something for him. He can get all in one for that." RAMSEY said, "Alright. Call me when you get to Copley News so I can meet you down there."
- 23. On or about October 6, 2014, at approximately 10:39 p.m., REGINALD BLAIR called EMERY LEE on the telephone. BLAIR asked, "You in the house?" LEE said, "Alright. You over there?" BLAIR said, "Yeah." LEE instructed, "Well go on in. Sharone and them in

there. I'll be back over there." BLAIR said, "Man, I ain't about, man, if I give that to her, you ain't going have, man, you'll be no good." LEE said, "Yes I will, I mean, yes I will. She ain't going to touch my shit (drugs). Just tie it. ... You should have called, I wouldn't have left."

- 24. On or about October 11, 2014, at approximately 1:04 p.m., ORLANDO REED called EMERY LEE on the telephone. During the conversation, LEE said, "I'm waiting on the people (ANGEL PICHARDO-MARTINEZ and LESLY PICHARDO FELIZ), but if you can get whatever you can up on that (get money to put in for LEE to purchase a larger amount of drugs), 'cause we going to be leaving probably today or first thing in the morning. Get it. Either way it go, when I get back, you still got your thing coming." REED said, "Ok, um, give me a few minutes." LEE said, "I'm waiting, I'm waiting, but we also got, I'm also going to have to give him some money, so, get as close as you can to that." REED said, "Yeah, I got about ..." LEE said, "Anyway and um ..." REED said, "I got about a ball (1/8 ounce of drugs) left, I'll bring you the rest (REED will give LEE the money for the drugs he previously purchased minus the 1/8 ounce REED still had). I'm going to bring you everything except for that ball I got left." LEE said, "Ok." REED asked, "Where you at?" LEE said, "I'm at home." REED said, "Ok. Here I come." LEE said, "Alright."
- 25. On or about October 12, 2014, at approximately 12:21 p.m., EMERY LEE called SHARAE RAMSEY on the telephone. RAMSEY asked, "You at the house?" LEE said, "Yeah." RAMSEY said, "Ok. I had, I had four (four grams of heroin) left, but I got them with me. ... I got three (three grams of heroin) gone, so I got your money with me and I got one more left with me." LEE said, "Alright, ah, yeah, well me and Big Head (EMERY LEE), we, what I'm going to do, I'll make you some up (get heroin ready for sale). Me and Big Head (EMERY LEE), we fitting to go to the football game." RAMSEY said, "Ok. Ah, if you want me to, I'll

bring your money past there or you could just, you know, wait 'til you come back." LEE said, "I'm going to be, I'm going to be in Cuyahoga Falls, man. I'll get it when I come back." RAMSEY said, "Oh, ok. Yeah, because I had to go to him (drug customer), that's why I got it with me." LEE asked, "When is you coming back? ... I was going to leave something (heroin) for Katie. She already (UI). I'll call you."

- 26. On or about October 17, 2014, at approximately 5:33 p.m., LARRY DIXON called EMERY LEE on the telephone. During the conversation, DIXON said, "Hey, I need a quarter (1/4 ounce of cocaine), man." LEE said, "I'll be there in one second, man." DIXON said, "Ok. Thank you."
- On or about October 17, 2014, at approximately 11:04 p.m., EMERY LEE called GEORGE LOCKE on the telephone. After a discussion about LEE's location, LEE said, "I'm going to get it (cocaine) ready for you." LOCKE responded, "Ok. I'm going to call you when I'm getting ready to pull up and then you can just run it out to me and all of that." LEE said, "Alright, alright."
- 28. On or about October 17, 2014, at approximately 11:19 p.m., KYLE BALLARD called EMERY LEE on the telephone. LEE said, "What's happening? What's left, man (how much cocaine is left)? Hold on, no. Hey, call me on the other phone, man." BALLARD said, "No. It's 12, though. It's 12 (12 ounces of cocaine). I told you that already." LEE said, "Ok. What was that you left up here?" BALLARD said, "Man, I gave you a whole extra, like 600 (\$600). What you got rid of, when we still got 12? So what are you talking about?" BALLARD said, "I still, I only got rid of three (three ounces of cocaine), dad. What are you talking about?" LEE said, "Ok, Ok, but still. I didn't ask you. I was saying, what was that, for I can know."

BALLARD said, "How much did you count? ... It's four, man. Four, four racks (\$4,000)." LEE said, "Alright. That's what I need to know."

- 29. On or about October 19, 2014, at approximately 5:07 p.m., RHONDA COLLINS called EMERY LEE on the telephone. During the conversation, LEE said, "Devon already told me what he gave you, so." COLLINS said, "Yeah." LEE instructed, "Just count it. Make sure it's there." COLLINS asked, "You alright, you alright?"
- 30. On or about October 22, 2014, at approximately 11:31 p.m., LESLY PICHARDO FELIZ called EMERY LEE on the telephone. LEE said, "Baby, listen. Everything's ... I'll leave anytime you want me to tomorrow 'cause I don't got nobody to come with me." FELIZ said, "Alright." LEE said, "Anytime you want me to leave tomorrow. Everything's packed (LEE's car is packed with money to give FELIZ). Haven't I, haven't I had more than that before, 'cause there's a lot of money. I'm pretty sure I done brought more money than this before, ain't I?" FELIZ said, "Yeah." FELIZ said, "You leave about one (UI) you can leave about two or three o'clock." LEE said, "Ok. ... That's what I'm gonna do" FELIZ said, "I just want you to get here like nine o'clock or eight." LEE said, "Gotcha, then I can come on back home, right, gotcha."
- 31. On or about October 24, 2014, EMERY LEE and KYLE BALLARD traveled from Ohio to New York to conduct a drug and money transaction with ANGEL PICHARDO-MARTINEZ, LESLY PICHARDO FELIZ, and Bolo.
- 32. On or about October 24, 2014, at approximately 2:26 a.m., EMERY LEE called LESLY PICHARDO FELIZ on the telephone after having multiple conversations on directions as to where to meet to conduct the drug transaction, LEE said, "Ok. I'm uh, I'll be at the, uh,

um, I'll be at the parking lot in one minute." FELIZ said, "Alright. I already told him (FELIZ's brother Bolo). LEE said, "Ok. Bye." FELIZ said, "Just go inside." LEE said, "Ok. Bye."

- 33. On or about October 24, 2014, at approximately 2:29 a.m., EMERY LEE called LESLY PICHARDO FELIZ on the telephone. LEE said, "Hey, uh, uh, he, he. Call him (Bolo) 'cause he tellin' me to get out the car." FELIZ said, "He changed it? Get out the car?" LEE said, "Yeah. He probably don't know what's what. He sayin' tomorrow?" FELIZ said, "Put him on, put him on." FELIZ has a discussion with Bolo who then returned the phone to LEE. FELIZ said, "Put your, go ass-in-first, ok?" LEE said, "Huh?" FELIZ said, "Make a U-ie (U-turn) and put your ass in first." LEE said, "Ok. Gotcha, gotcha." FELIZ said, "From the car." LEE said, "I gotcha, I gotcha, I gotcha. Alright." FELIZ said, "Ok. I should be there. I'm gonna be there. Bye."
- 34. On or about October 24, 2014, at approximately 2:36 a.m., LESLY PICHARDO FELIZ called EMERY LEE on the telephone. FELIZ said, "Hey, just wait for a minute there, ok? I should be there shortly." LEE said, "Wait, ok? You say you'll be here shortly?" FELIZ said, "Yeah, I'm almost (UI)." LEE said, "Ok. Ok. I'm just, I'm just here sittin' waitin' on you." FELIZ later asked, "He got you in the front or in the parking lot?" LEE said, "I'm in the back."
- 35. On or about October 24, 2014, at approximately 3:46 a.m., EMERY LEE called LESLY PICHARDO FELIZ on the telephone. FELIZ said, "I meant to, to, um, to um, to go back to your way." LEE said, "Take the money back?" FELIZ said, "To go back to your way." LEE said, "Uh, ok. ... Yeah, go, go back home?" FELIZ said, "Yeah, because ... not all the way home. Like halfway or something and stay around here local in the hotel." LEE said, "Shit. I got somebody with me. They got to be back at home." FELIZ said, "Alright. What?" LEE

said, "I got, I got somebody with me that gotta be back at home, but you want, you want me to, uh ..." FELIZ said, "Alright. So then go back home because right now something happened that I can't go, I can't, I can't talk right now." LEE said, "Oh, ok. I, I mean, I can bring it back if you want me to." FELIZ said, "Alright, so go back." LEE said, "Ok." FELIZ later explained that, "it was kinda like, it was kinda like, uh, weird around my way. So that's why I ..." LEE responded, "I know what you mean. Bet, better safe than sorry." FELIZ told LEE that her brother Bolo would contact him later in the day.

- 36. On or about October 24, 2014, at approximately 10:14 a.m., LARRY SMOOT called EMERY LEE on the telephone. LEE said, "I'll holler at you when I get home, man. It's crazy, it's crazy. I, it's real crazy. I'll talk to you when I get there." SMOOT said, "I was about to say, tell them I have four (\$4,000) from the old (to pay FELIZ for prior drugs purchased)." LEE said, "I know, I, I told, I told her (LESLY PICHARDO FELIZ) you got it. That I, I, she told me to get it as soon as I get there. I'll tell you 'bout it."
- 37. On or about October 27, 2014, at approximately 12:58 p.m., LARRY SMOOT called EMERY LEE on the telephone. During the conversation, SMOOT said, "I'm about to get this little bit of money together. It should be like ..." LEE said, "Yeah man, because we going (to meet with drug supplier), because you know what, now I'm tripping because I know they tried calling me yesterday." SMOOT said, "Alright, well, I got my people coming up today. So I should be ready by the end of ... by the time you get ready to leave."
- 38. On or about October 28, 2014, at approximately 12:17 p.m., LARRY SMOOT called EMERY LEE on the telephone. During the conversation, SMOOT said, "I'm right around the corner from you. I gotta come blast some of that, uh stuff (bring LEE money for drugs)

'cause I didn't, I didn't take none with me. I left it all over there." LEE said, "Oh well. How long will it take you?" SMOOT said, "Five minutes. I'm right around the corner."

- 39. On or about October 31, 2014, at approximately 4:23 p.m., ORLANDO REED called EMERY LEE on the telephone. LEE said, "Yeah Meech?" REED said, "What's the word (did LEE have cocaine for sale)?" LEE said, "Ok, it's kinda of, it's shaky right now, but I'm might could squeeze a pool (1/8 ounce of cocaine) for you right now. If you just all the way out. Ah, because, you know, like me personally I got like a border (1/4 ounce of cocaine) but ah, I got to hold on to something 'til they come. So, you need that, I'll do it. Yeah. ... But either way it go. Unless you want to hold off and wait and see, because he supposed to be touching down so." REED said, "Alright. I can wait."
- 40. On or about November 1, 2014, at approximately 6:16 p.m., LARRY SMOOT called EMERY LEE on the phone. SMOOT said, "Shit, was just seeing what was up (was LEE supplied in drugs)." LEE said, "I'm a, I'm try to call, I'm try to call dude (drug supplier), I'm a try to call dude, a, well I'm going to call my son. If he got, he got to call dude for me." SMOOT said, "Alright because look I could." LEE said, "Yeah." SMOOT said, "Ah, I could, I could throw the money up front for at least ten (ten grams of heroin). You know what I'm saying?" LEE said, "I'm a call you. ... Let me, I'm call him first, then I'm call you. Alright?" SMOOT said, "Alright."
- 41. On or about November 1, 2014, at approximately 11:08 p.m., KYLE BALLARD called EMERY LEE on the telephone. BALLARD asked, "Where you at?" LEE said, "Ok. I'm ah, me and (UI) had to go back and get Jordan, but, ah, I'm at the house right now. But I'm fitting to leave out, ah. I got everything, man. ... I got, I got it done up (LEE had the money

together to pay ANGEL PICHARDO-MARTINEZ) now, so ah, I'll ah, I'll be through with this in a second." BALLARD said, "Alright."

- 42. On or about November 1, 2014, at approximately 12:08 p.m., EMERY LEE called SHARAE RAMSEY on the telephone. LEE asked, "How you looking (did RAMSEY have heroin)?" RAMSEY said, "I'm good." LEE said, "Alright, well you just want me to come tomorrow?" RAMSEY said, "Oh yeah, I'm good. I still got like ten, eleven (10 or 11 grams of heroin)." LEE said, "Ok, cool. I'm going to go on to the house."
- 43. On or about November 2, 2014, at approximately 1:21 p.m., ORLANDO REED called EMERY LEE on the telephone. REED said, "Where you at?" LEE said, "I'm on Orlando." REED said, "I want to shoot some pool (purchase 1/8 ounce of cocaine). I want to shoot some pool." LEE said, "Alright."
- 44. On or about November 2, 2014, at approximately 3:33 p.m., EMERY LEE called REGINALD BLAIR on the telephone. BLAIR said, "What's up with you, man?" LEE said, "I told you. I tried to get in touch with, whatever you can come up (money to purchase drugs) with because ah ... Bolo (LESLY PICHARDO FELIZ's brother) might be here so, ah you want me to come by?" BLAIR said, "Oh, ok. Yeah. You can come over."
- 45. On or about November 2, 2014, at approximately 9:27 p.m., LARRY SMOOT called EMERY LEE on the telephone. LEE said, "Ok. Hey man, uh, uh, you know they charge us 85 a piece (\$85 per gram of heroin), but, if you don't want it, I keep, if you don't want it, I'm keepin' it for myself ... it's worth it 'cause I, I've already, uh, I already test it and, uh, I'm, I'm just gonna put a half on mine (mix the heroin with something). You can go ahead." SMOOT and LEE agreed to meet.

- 46. On or about November 3, 2014, at approximately 9:45 a.m., RHONDA COLLINS called EMERY LEE on the telephone. During the conversation, COLLINS asked, "When you leaving?" LEE said, "Any minute. What's wrong, babe?" COLLINS said, "Oh, because I got a lot to do today, but my people get they checks so I need you to leave me ..." LEE asked, "Huh?" COLLINS said, "I need you to leave me four (four grams of heroin)." LEE said, "You need what?" COLLINS said, "Because tomorrow is the third. I need you to leave four." LEE said, "Alright."
- 47. On or about November 5, 2014, at approximately 7:50 p.m., RONNIE JOHNSON, JR. called EMERY LEE on the telephone. JOHNSON said, "What's up, bro?" LEE said, "Hey, I was wondering, can I come (get heroin)?" JOHNSON said, "Um, let me give you a call back in a minute O.G." LEE said, "Ok. Everything sizame (LEE wanted the same amount of heroin that he previously purchased)." JOHNSON said, "Ok."
- 48. On or about November 6, 2014, at approximately 10:33 a.m., EMERY LEE called RONNIE JOHNSON, JR. on the telephone. LEE asked, "What's up, babe?" JOHNSON said, "Still waiting. 'Bout to have some good (heroin) for you though, because I, I got to, um, I just got to get over there." LEE said, "Ok, call me. I'll leave as soon as you tell me to." JOHNSON said, "Ok, I got you O.G."
- 49. On or about November 7, 2014, at approximately 12:34 p.m., EMERY LEE called DIVINE DANIELS on the telephone. DANIELS said, "What up, Head?" LEE responded, "Hey, try calling AILYSON (AILYSON CLIPPER) and see if she's on deck (supplied with heroin), so I can, ah, now that you know somebody. I'll try a little something from them." DANIELS said, "Alright, yeah. I ain't even, ah, I wasn't even ready. Ah, I'll call her for you. I'm about to call her right now." LEE said, "Alright."

- 50. On or about November 7, 2014, at approximately 3:30 p.m., DIVINE DANIELS called EMERY LEE on the telephone. LEE answered, "What's up, Divine?" DANIELS said, What's up with it, Head? You was still looking?" LEE said, "Like, what they got?" DANIELS said, "Ah, they got some gray shit (grey heroin)." LEE said, "Yeah, I, what they want?" DANIELS said, "Ah shit, about a dollar (\$100 per gram of heroin)." LEE said, "Oh, see, no, I'm buying too many to be paying a dollar, man." DANIELS said, "Oh, How many you want?" LEE said, "Tell them, hey, tell them if they give me like, 80, 85 (\$80 or \$85 per gram of heroin), I'll buy ten (ten grams of heroin) of them." DANIELS said, "80, 85, you'll buy ten?" LEE said, "Yeah." DANIELS said, "Ok. I'll call you right back."
- 51. On or about November 10, 2014, at approximately 6:25 p.m. LARRY SMOOT called EMERY LEE on the telephone. SMOOT asked, "What's good? We get straight (supplied in drugs)?" LEE said, "Yeah, who is this?" SMOOT said, "This L." LEE said, "I'm fitting to go to him (ANGEL PICHARDO-MARTINEZ) right now. I know we fitting to get straight, though. So don't worry about it." SMOOT asked, "What about the hardball (crack cocaine)?" LEE said, "Ah, I know Monte (DEMOND BAKER) is going to give me that but I'm going to get this first. I'm going to get this now." SMOOT said, "Ok, alright."
- On or about November 10, 2014, at approximately 7:28 p.m., DAVID ROBINSON called EMERY LEE on the telephone. ROBINSON asked, "Did you talk to her (drug supplier) yet?" LEE said, "Yeah, I talked to her. She (LESLY PICHARDO FELIZ) want me, I told you she want me to do, do some collectin', man. You know, she, uh, mentioned you and everybody else, man. I mean, I don't know if you all got somethin' to show her yet or not. But hey, man, I'm just tellin' ya, I'm just tellin' ya, I can't take it no further, man. I'm getting real tired of it, really. ... I'm 'bout to go down there and she want me to show her somethin',

man. And she say, I mean, for, I mean, she go, she gonna give me some easy way (LEE would get fronted the drugs) to go 'cause I'm, there's no collectin' from them people, but you know, like, I mean, I don't know if you got somethin' to give, but, and, show them in good faith (LEE would give a portion of the money for the fronted drugs in a showing of good faith to the supplier). I don't know, I don't know if they got it. You know. And she say he (ANGEL PICHARDO-MARTINEZ) spoke on, on you too. So, I don't know." ROBINSON said, "Alright. When, when you gonna go down there?" LEE answered, "I'm, I'm waitin' to get the rest of this money for, from three other people, man. Like I said, I don't know if you got somethin' to give 'em, but, but give, give it to me and let me, let me take it 'cause, uh, uh, I would (UI) amount of dollars before I go, man." ROBINSON later said, "Alright. Alright." LEE said, "Let, let me, let me know what you got for him (ANGEL PICHARDO-MARTINEZ), man." ROBINSON said, "Alright. When you, when you leavin'?" LEE responded, "Uh, that's, that's, I, once I get through this collecting. Get everybody. I'm gonna tell her what I got from everybody and then I'm, I'm gonna be headin' out." ROBINSON said, "Yeah. Ok." LEE said, "They quoted, they quoted they quoted six something. I know on that one thing for you they quoted six somethin'." ROBINSON said, "Alright. Um, alright, um alright. I'll just go over there when I get off work." LEE SAID, "Alright. Do that then so I can get on outta here. man." ROBINSON said, "Ok."

53. On or about November 11, 2014, at approximately 10:13 p.m., EMERY LEE called DAVID ROBINSON on the telephone. LEE said, "Dawud." ROBINSON responded, "Yeah." After a brief conversation, LEE said, "How much do you want? How much you have so I can tell this woman (drug supplier), man?" ROBINSON said, "Uh, six (\$6,000)." LEE said, "I was, at least bring that then, man." ROBINSON said, "I'll have it tomorrow for sure. Uh, for

sure tomorrow, soon as I get off work." LEE said, "Alright, man." ROBINSON said, "I'll swing right over to your house."

- 54. On or about November 19, 2014, at approximately 2:24 p.m., RONNIE JOHNSON, JR. called EMERY LEE on the telephone. During the conversation, JOHNSON said, "Ok, this is what I wanted to tell you." LEE said, "Yeah." JOHNSON said, "It's pretty cool (heroin is of good quality) but it's real light. It's like a whitish (the heroin is a whitish color)." LEE said, "Right, right. But it's good?" JOHNSON said, "Yeah. It's cool." LEE responded, "Ok. Get me 20 of them (20 grams of heroin)." JOHNSON said, "Ok." LEE said, "Alright, got you." JOHNSON and LEE met at the Applebee's parking lot in Independence, Ohio, to complete the drug transaction.
- 55. On or about November 19, 2014, at approximately 7:15 p.m., EMERY LEE called DEMOND BAKER on the telephone. LEE asked, "Hey, you at the house?" BAKER responded, "Yeah. Why?" LEE said, "I'll be there in a minute." BAKER said, "Why? What's up, man?" LEE said, "I'm going to get me a pool game (eight ball or 1/8 ounce of cocaine)."
- 56. On or about November 20, 2014, at approximately 9:38 a.m., ANGEL PICHARDO-MARTINEZ called EMERY LEE on the telephone. During the conversation, PICHARDO-MARTINEZ said, "On the boy (heroin) ... where we, where are we on the boy?" LEE said, "Ok, I was pretty close to. I know I need something to work with, and I've been, I've been, but ah, I can't owe no more than, because I've been giving seven, seven, seven (\$7,000). Ah, I got the book (UI) but I know I'm right at two (\$2,000)." PICHARDO-MARTINEZ responded, "It was five (\$5,000) and seven (\$7,000). It was only five and seven." LEE said, "Ok. Yeah, I'm saying, I ah, I brought a lot of money up there. I gave her (LESLY PICHARDO FELIZ) a lot of money. I got all mine, I got all ..." PICHARDO-MARTINEZ said, "Ok, but

you got to understand that it was from that ... old boy (heroin previously purchased). Because remember that you got 450 one thing, 400 and one thing, and 550 dollar thing. That you was not supposed to open it ... until you pay it off everything. You and L (LARRY SMOOT), and, and, and George." LEE said, "I paid the one off. I paid the one off. I paid the one off. And then that's when I opened the other one. I gave, L (LARRY SMOOT) owes some too. ... Ok, I brought, I did, I brought, I did bring a lot of money up." PICHARDO-MARTINEZ said, "Yeah but, I remember, that every ten (\$10,000) that you bring, that you was bring something. She (LESLY PICHARDO FELIZ) let me know everything and I then write it down. (UI) ok, well I'm (UI) see you with that ok. I'll just write it down. I got everything writed down. It was five (\$5,000) seven (\$7,000), right? LEE said, "Let me see." PICHARDO-MARTINEZ said, "Five (\$5,000), seven (\$7,000) and seven (\$7,000)." LEE said, "No. You mean thousand? I brought way more than seven thous, five seven seven thousand. On the, I brought at least that on the new. And then the last time I came, when I brought, I brought extra money the last time when I brought the money for the ah, when I took the money to ah, to um ..." PICHARDO-MARTINEZ said, "When you bring the last one. ... The last, the last one when you see my brother-in-law (Bolo). What you bring him then?" LEE said, "I brought, I brought, I know I brought sixty-six thous (\$66,000), a hundred sixty-six thousand (\$166,000) and then I brought some ..." PICHARDO-MARTINEZ said, "Don't says thousand." LEE said, "And then I brought some more thousand." PICHARDO-MARTINEZ said, "Don't say thousand. Just say the numbers." LEE said, "Ok. Right. Ok. A hundred sixty-six and more. I put that in one and then I put more"

57. On or about November 20, 2014, at approximately 4:16 p.m., EMERY LEE called RHONDA COLLINS on the telephone. COLLINS said, "I was just about to call you.

You know what? This, I give my new people, you get the f***ing garbage (the heroin was of bad quality)." LEE asked, "What you talking about? Them, them two (two grams of heroin), right?" COLLINS responded, "Yeah, man. That's ..." LEE interrupted, "Guess what? Guess what? Let them (drug customers) know, you going to straighten them (supply them with good quality heroin), man. Ah ..." COLLINS said, "Oh my god." LEE said, "Them two ain't. The two ain't. The first two ain't (the first two grams of heroin are not of bad quality)." COLLINS repeated, "Oh my God." LEE said, "You talking about the two I gave you, right?" COLLINS said, "Yeah." LEE said, "Yeah. But the ah, the ah, the ah, them other two you had, they are not." COLLINS said, "Ok. Well the ones they got was, and, oh my God, and they spend a lot of f***ing money, man." LEE said, "Alright. Well I'm trying to, I got this (UI). I'm trying to call this n****r now, so I can swap this shit back out, man. I got ..." COLLINS said, "Yeah. You call me as soon ..." LEE later asked, "How much money you got?" COLLINS responded, "Um, I got enough. I got your money." LEE said, "Alright because I need it." COLLINS said, "Shit. This is bullshit, man." LEE said, "Alright, um, yeah, um, I got this ah, I'm going to try to call Man Man right now, man. Let me call him back so I can swap this shit out. Bye."

- 58. On or about November 21, 2014, at approximately 4:10 p.m., EMERY LEE called AILYSON CLIPPER on the telephone. During the conversation, LEE said, "Hey, why don't you see if I get, like, a few more of them (grams of heroin). What would he (LEARDRUS BURRIS) say about ninety cent (\$90 per gram of heroin)." CLIPPER said, "Alright." LEE said, "Call me and let me know right away."
- 59. On or about November 21, 2014, at approximately 4:34 p.m., AILYSON CLIPPER called EMERY LEE on the telephone. CLIPPER said, "Was you coming through or what?" LEE said, "Yeah. Did he (LEARDRUS BURRIS) say I can get them for ninety cent

(\$90 per gram of heroin)?" CLIPPER responded, "Yeah." LEE said, "Alright. I'm probably going to get a, how many you got with you right now, AILYSON? You got at least, at least six or seven (six or seven grams of heroin) with you?" CLIPPER said, "Yeah, I got five (five grams of heroin) of them. I can get more though." LEE said, "Ok. Ok. I'll come and get the five. I'll be there in a minute, ok?" CLIPPER said, "Ok."

- 60. On or about November 21, 2014, at approximately 6:15 p.m., EMERY LEE called RHONDA COLLINS on the telephone. LEE said, "Oh, oh, this shit right on (the heroin is of good quality). Joe said it's a bad mother f***er." COLLINS said, "Oh, for real?" LEE said, "Yeah. Yeah. He called me just now. He ain't made it home yet. He said that shit hit him before he got home." COLLINS said, "Ok. I'll be there in two minutes, two seconds. I'm about to, um, I'm taking this..." LEE said, "Ok. What's up with the ones (grams of heroin) you had?" COLLINS said, "I'm about to give it back to you." LEE said, "Ok. Ok. You got rid of the one (gram of heroin), right?" COLLINS said, "Yeah." LEE said, "Alright. I want the money when you get here." COLLINS said, "Ok, ok. Minus your dinner."
- 61. On or about November 21, 2014, at approximately 6:56 p.m., EMERY LEE called AILYSON CLIPPER on the telephone. LEE said, "Hey, about an hour. I know I'm going to be getting the same thing, but I might get more." CLIPPER later said, "Ok. So when are you going to be ready?" LEE responded, "About an hour."
- 62. On or about November 22, 2014, at approximately 10:04 a.m., EMERY LEE called DEMOND BAKER on the telephone. LEE asked, "You at the house?" BAKER responded, "Yeah. Why? What's up?" LEE said, "I'll be there in, you know, I want to, I'm going to go up Garfield and jog a quarter mile, man (get a 1/4 ounce of cocaine)." BAKER said, "I need to, ah, this mother f***ing god damn hill is slippery as hell (BAKER was concerned

about law enforcement presence in the area)." LEE said, "I know it's slippery. It's slippery like a mother f***er. I'm telling you, you better be careful, n*****, I'm telling you." BAKER said, "Yeah." LEE said, "Anyway, I, hey, I'll be there, so, you know, that way I ain't got to wait, so, I'm on the way." BAKER said, "Alright."

- 63. On or about November 23, 2014, at approximately 11:41 a.m., AILYSON CLIPPER called EMERY LEE on the telephone. CLIPPER said, "Yeah. Do you want me to meet you or what?" LEE said, "Yeah, yeah, ah, yeah. I'm right at Copley News. Hey, ah, how many you got on you (how much heroin did CLIPPER have with her)?" CLIPPER said, "I don't, f***, what you needed?" LEE said, "Ah, I might go on and get ten (ten grams of heroin). I might as well get ten. You got ten on you?" CLIPPER responded, "Yep. Where you at?" LEE and CLIPPER met at Copley Newsstand in Akron, Ohio, to complete the drug transaction.
- 64. On or about November 24, 2014, at approximately 11:49 a.m., EMERY LEE called AILYSON CLIPPER on the telephone. During the conversation, LEE said, "Uh, I might come and get five or ten (five or ten grams of heroin)." CLIPPER said, "I got you. When you think you're coming?" LEE said, "I'm going to call you. I'm stopping at this place to play my numbers ... and then I'll come to you." CLIPPER said, "Uh, alright, that's cool." LEE and CLIPPER met later for the drug transaction.
- 65. On or about November 24, 2014, at approximately 8:37 p.m., RHONDA COLLINS called EMERY LEE on the telephone. LEE answered, "Yeah, babe." COLLINS said, "I need two (two grams of heroin) cupcakes." LEE said, "Huh?" COLLINS repeated, "I need two cupcakes." LEE asked, "What kind of cupcakes, babe?" COLLINS said, "Oh my god. You are so f***ing slow." LEE said, "Oh. Ok." COLLINS said, "Alright."

- 66. On or about November 25, 2014, at approximately 1:53 p.m., AILYSON CLIPPER called EMERY LEE on the telephone. CLIPPER asked, "What's up?" LEE said, "What it look like? It look like all cool on five (five grams of heroin) or what?" CLIPPER said, "Yeah." LEE said, "Ok. Give me a minute and I'll be around there. I'm ah, I got to stop here at the newsstand, then I'll come around there." CLIPPER said, "Alright."
- 67. On or about November 25, 2014, at approximately 3:18 p.m., ANGEL PICHARDO-MARTINEZ called EMERY LEE on the telephone. During the conversation, PICHARDO-MARTINZEZ threatened LEE that if he was "playing around" that he would come to Akron because LEE was not returning his calls. The two had an extensive conversation regarding their drug transactions. LEE said that on his last trip to see PICHARDO-MARTINEZ, he brought with him \$166,750 for PICHARDO-MARTINEZ. PICHARDO-MARTINEZ wanted to discuss the heroin transactions stating that he gave LEE 455 grams and 500 grams of heroin. LEE responded that he had paid one of the heroin quantities on his last trip, giving PICHARDO-MARTINEZ \$7,000. LEE then referred to his drug ledger and noted that on September 23, 2014, he paid \$3,000 on the heroin, on September 27, 2014, he paid \$7,000 on the heroin, and on September 30, 2014, he paid \$3,000 on the heroin. LEE said that that on September 23, 2014, he brought \$126,000 for cocaine and that PICHARDO-MARTINEZ gave him four kilograms and 750 grams of cocaine. PICHARDO-MARTINEZ disputed LEE's calculations, stating that he gave LEE 150 grams of cocaine as a gift and the total was 4,600 grams of cocaine to which LEE owed him \$161,000. During the dispute, LESLY PICHARDO FELIZ got on the telephone with LEE to further discuss the drug debt. FELIZ stated that on September 27, 2014, LEE brought \$35,000 towards the cocaine and an additional \$7,000 for the heroin. She further stated that on September 30, 2014, LEE brought \$6,000 for the heroin he got that day. FELIZ stated that on

October 2, 2014, LEE got 830 grams of heroin and paid her \$29,050 for the heroin and \$72,000 for 2,800 grams of cocaine. FELIZ confirmed that on October 2, 2014, LEE paid her \$122,050 for both heroin and cocaine. FELIZ further stated that on October 7, 2014, LEE paid \$36,000, \$36,000, \$29,050, and \$10,000 for heroin for a total of \$110,050. On October 13, 2014, LEE paid \$9,000 for heroin. On October 27, 2014, LEE paid \$166,750 for cocaine but also got heroin. FELIZ and LEE argued about whether LEE also paid \$6,000 for heroin. FELIZ said that LEE still owed \$20,000 for heroin, which LEE disputed. FELIZ told LEE that he had not brought the money LARRY SMOOT owed for the 455 grams and 400 grams of heroin. FELIZ and LEE discussed the need for heroin and cocaine in the Akron area and FELIZ asked what would happen if PICHARDO-MARTINEZ brought ten kilograms of cocaine to LEE. LEE replied that it would sell in no time. FELIZ told LEE to get ready with as much money as he could get because when LEE called, PICHARDO-MARTINEZ would be coming to Akron with the ten kilograms. Towards the end of the call LEE said, "Ok, Lesly." FELIZ said, 'Don't, don't mention my name or I'm gonna f***in' kill you." After LEE apologized, FELIZ said, "Loyalty or die."

68. On or about November 26, 2014, at approximately 7:55 p.m., EMERY LEE called DAVID ROBINSON on the telephone. LEE said, "Ok. This is what the deal is, man, uh. He (ANGEL PICHARDO-MARTINEZ) say, he said, uh, he said we getting' ten (ten kilograms of cocaine). He said we getting' ten for the first (December 1)." ROBINSON said, "Alright." LEE said, "Yep. That what he said. We gettin' ten for the first." ROBINSON said, "Alright. What about the other thing (heroin)?" LEE said, "I, I didn't ask for that, that, that, that's gonna be automatic, man." ROBINSON said, "Ok."

- 69. On or about November 30, 2014, at approximately 5:18 p.m., DIVINE DANIELS called EMERY LEE on the telephone. During the conversation, DANIELS asked, "What is it looking like your way?" LEE said, "Ah, nothing. I got something from AILYSON (AILYSON CLIPPER) and them. I'm fitting to go (UI)." DANIELS later said, "My peoples had some pretty good shit (heroin) for a little nice ticket (good price), if you want to check it out." LEE said, "Ok. I'm going to call you after I leave here. What's the ticket (price)?" DANIELS said, "Ah shit, about, about beighty (\$80 per gram of heroin) or something." LEE said, "Ok, ok. I'm going to call you."
- 70. On or about December 2, 2014, at approximately 2:38 p.m., REGINALD BLAIR called EMERY LEE on the telephone. BLAIR said, "Man, sending you smoke signals (BLAIR was trying to contact LEE). You must didn't get them." LEE said, "Man, hey, hey, you know what? I don't think I shared this situation with you. But I'm going to run it (drugs) down to you, ah, I'm going to run it down to you as soon as I, soon as I can break away. ... Yeah, ah, I'm fitting. Mont just pulled me up something today so, I'm ah, but I'm ah, I'm still going to give you a little grapes on something. ... Alright?" BLAIR said, "Alright."
- 71. On or about December 3, 2014, at approximately 8:40 p.m., EMERY LEE called GEORGE LOCKE on the telephone. LEE said, "Ok. What did you want? You wanted the same thing, right? ... For I can tell him, for I can get it." LOCKE said, "Um, quarter pounder with cheese (1/4 ounce of cocaine)." LEE said, "Ok." LEE and LOCKE agree to meet at LOCKE's residence that evening.
- 72. On or about December 5, 2014, at approximately 4:03 p.m., EMERY LEE called LARRY SMOOT on the telephone. SMOOT answered, "Yes." LEE said, "Hey, what's up, man?" SMOOT asked, "What happened?" LEE said, "Ah, nothing. Me and my woman came

up here to (UI), man, for a couple days. I'm waiting to try to collect, collect a little bit more money, man, on this one tip, man. And ah, you talk to your cousin (ANGEL PICHARDO-MARTINEZ)?" SMOOT said, "Yeah. He been blowing you up (calling a lot)." LEE said, "Oh. I mean, I mean, I wasn't fitting to go up, I know what he talking about. I wasn't fitting to go up there yet, no way." SMOOT said, "You ain't going up there?" LEE said, "I ain't going there right now. No, I'm going up there, I got to, I want to get a few more bucks but, yeah, what he said he was ready for us or something?" SMOOT said, "Yeah." LEE said, "Alright, well yeah, I called him. You want to ride with me when I go?" SMOOT said, "Yeah. Hell yeah."

- GEORGE LOCKE on the telephone. LOCKE said, "So you're on your way to my house?" LEE said, "Yeah. I'll be ah, ah, what do you want me to do, for I can know what to do?" LOCKE said, "Ah, I'm going to go ahead on and get that quarter pounder with cheese (1/4 ounce of cocaine)." LEE said, "Alright, alright. That's what I need to know. Alright." LOCKE later asked, "Ok, oh, you going to your son's (DEMOND BAKER)?" LEE said, "Yeah. No, that's who I'm going to get it from, yeah." LOCKE said, "Oh, yeah, yeah, because that was alright." LEE said, "Ok. That's where I'm going."
- 74. On or about December 8, 2014, at approximately 10:52 p.m., EMERY LEE called AILYSON CLIPPER on the telephone. LEE asked, "Hey, you got ah, five of them (five grams of heroin)?" CLIPPER said, "Uh huh." LEE said, "Ok. Good. I'm, I'm, I gotta run and get the rest of this money but I'll, I'll be through." CLIPPER said, "Ok."
- 75. On or about December 9, 2014, at approximately 12:17 p.m., EMERY LEE called SHARAE RAMSEY on the telephone. LEE asked, "Hey, did you get rid of anything (sell any heroin)?" RAMSEY said, "Yeah. I got rid of two of them (two grams of heroin)." LEE said,

"Alright. I'll be there in a minute. That way I can leave you, ah, I should be able to leave you."

RAMSEY said, "Ok." LEE said, "I be pulling up in a second." RAMSEY said, "Ok."

- 76. On or about December 9, 2014, at approximately 5:10 p.m., DAVID ROBINSON called EMERY LEE on the telephone. During the conversation, ROBINSON asked, "Your son (DEMOND BAKER) got a couple jack (couple ounces of cocaine)?" LEE said, "Yeah, he got, he got somthin'." ROBINSON said, "Alright. I need, I need ah, ah, grab two (two ounces of cocaine). Shit, I don't know when." LEE said, "Ok. ... You better come. I'll run over there, I'll run over there with you right quick." ROBINSON said, "Alright. I mean when you gonna head there? 'Cause it's only take me like a few minutes to get there, you ... no sense to comin' all the way to follow you that." LEE said, "Alright. ... I'm gonna call him right now. Ok? I'm gonna call him right now. Alright."
- 77. On or about December 9, 2014, DEMOND BAKER possessed approximately 63 grams of cocaine, 14 grams of crack cocaine, \$3,680 in U.S. currency, digital scales, marijuana, cellular telephones, a stolen Taurus 9mm handgun serial number TZH88842, at his residence on Longview Avenue, Akron, Ohio.
- 78. On or about December 9, 2014, DAVID ROBINSON possessed approximately 84 grams of cocaine.
- 79. On or about December 11, 2014, at approximately 6:40 p.m., LARRY DIXON called EMERY LEE on the telephone. LEE said, "Larry?" DIXON replied, "Yeah, I'm sayin', did they hurt 'em, did they hurt him, though?" LEE said, "Uh, uh, uh, you lookin' (did DIXON want to purchase cocaine)? You lookin?" DIXON said, "Yeah, um." LEE said, "Yeah, what you, ah, what you ah, lookin' for?" DIXON said, "Uh, shit, like ah four (four ounces of cocaine)." LEE said, "Ok, cause ... I be down there." DIXON said, "Alright."

- On or about December 11, 2014, at approximately 9:05 p.m., EMERY LEE called 80. DEMOND BAKER on the telephone. LEE said, "You don't have nothin' but five (\$5,000) there, Monte." BAKER said, "In what, what," LEE said, "In that brown thing. In the brown one." BAKER asked, "Where was it?" LEE said, "There was five ... It was, you had five in there." BAKER asked, "It was what?" LEE said, "It was five in there." BAKER asked, "Where?" LEE said, "You just asked me to come and check this, it was ..." BAKER said, "Less?" LEE said, "No, no, it's, it's there, it was five in there all together 'cause I, I'm just, I'm just checking these stacks (\$1,000 stacks of U.S. currency) now. It was, it was five in there. You better start thinkin', man. ... It was five in there." BAKER said, "The other one was 35 (\$35,000). I know that." LEE said, "I don't know, I, I ain't never touched that one. I, I, I have never touched ... So I, I, I would have, I would have no idea that ... ain't no reason for me to look in there. So, I would, I would never know what's in that one. (I) know this was five. I'm puttin' it back, I'm puttin', I'm puttin' it right back again. I'm just now getting' home, that's why. I'm just callin' to let you know 'cause you told me to check." BAKER said, "I was tryin' to figure out what I just gave you. Alright."
- 81. On or about December 12, 2014, at approximately 9:08 p.m., COLLIE BROOKS called EMERY LEE on the telephone. During the conversation, BROOKS said, "I was trying to see if you was at home. I wanted to give you something toward my little (BROOKS wanted to give LEE money to get heroin)." LEE said, "I'm on my way home right now. Where you at now?" BROOKS said, "Sitting out in front of your house." LEE said, "Alright. You can go on in there, or ah, I'll be there in like ten minutes. But if you want to, I think Rhonda (RHONDA COLLINS) in there." BROOKS said, "I can. ... I got two (\$2,000) I'm going to give you now. Everytime I get ahold of something, man, ah, I'm going to give it to you." LEE said, "Take your

time. You my n*****, man. Take your time. And when things get (UI), you know they just went to Monte's (DEMOND BAKER) house, so. I'm going to talk to you." BROOKS said, "Oh, no. I didn't know that." LEE said, "Yeah, yeah, yeah, yeah, yeah. Yep." BROOKS said, "Ok. I'm getting ready to knock on the door and give it to her." LEE said, "Ok, babe."

- 82. On or about January 17, 2015, ANGEL PICHARDO-MARTINEZ traveled from New York to EMERY LEE's residence in Akron, Ohio. LEE and PICHARDO-MARTINEZ had a verbal and physical altercation which lead to PICHARDO-MARTINEZ being shot in the stomach and in the arm.
- 83. On or about January 17, 2015, EMERY LEE and RHONDA COLLINS possessed approximately 24 grams of cocaine, approximately 2 grams of crack cocaine, 2 grams of heroin, 18 doses of Suboxone, 30 unidentified pharmaceutical pills, a Davis Industries .380 caliber handgun serial number AP038629, a Davis Industries .25 caliber P25 handgun serial number 074287, ammunition, digital scales, drug ledgers, \$2,280 in U.S. currency, at LEE and COLLIN's residence on Forbes Avenue, Akron, Ohio.
- 84. On or about February 2, 2015, at approximately 12:06 p.m., ANTOINE DORTCH called AILYSON CLIPPER on the telephone. During the conversation, EMERY LEE called CLIPPER. CLIPPER placed DORTCH on hold and spoke with LEE. LEE said, "Hey Alley. I'm right by you. Can we get three (three grams of heroin) ready? I got the money." CLIPPER replied, "Ok." LEE said, "Yeah, yeah. I be there, I'll be there in about three minutes." CLIPPER returned to her call with DORTCH and informed him that she was getting three ready for "Head (LEE)."
- 85. On or about February 6, 2015, beginning at approximately 10:20 am, AILYSON CLIPPER and LEARDRUS BURRIS exchanged a series of text messages. CLIPPER texted,

"Can I hold 10 (grams of heroin) missing money waiting on his ppl." BURRIS later texted, "Yea oops ma bad can u come on kelly." CLIPPER responded, "K thanks here I come."

- 86. On or about February 6, 2015, at approximately 5:20 p.m., AILYSON CLIPPER met with LEARDRUS BURRIS at **** Kelly Avenue.
- 87. On or about February 9, 2015, at approximately 11:30 a.m. AILYSON CLIPPER exchanged a series of text messages with LEARDRUS D. BURRIS. CLIPPER texted, "I got 910 (\$910 for the heroin previously purchased) for u been sitting on it waiting for the other I'm out u come grab I'll call when I get home owe u band (\$1,000) Should have soon." BURRIS later replied, "K u think u can come to my spot..." CLIPPER replied, "Yeah." BURRIS texted, "I'm at o Charlie's on howe." CLIPPER responded, "OK on way."
- 88. On or about February 9, 2015, at approximately 7:34 p.m., ANTOINE DORTCH called AILYSON CLIPPER on the telephone. During the conversation, CLIPPER informed DORTCH, "I just went up and gave Lee Lee (LEARDRUS D. BURRIS) his money at Charley's. He thought that was funny." DORTCH asked, "At Charley's?" CLIPPER answered, "At the... at by Chapel Hill." DORTCH said, "Oh Charley's. What is he up there doin'?" CLIPPER replied, "With his girl he is." DORTCH continued, "It's like that dude (BURRIS) stays right by the mall." CLIPPER asked, "You say what?" DORTCH replied, "I figure that dude stay by the mall. What did he done talk about?" CLIPPER responded, "Nothin', they was eatin'. I just sat down and watched for a second and... rolled."
- 89. On or about February 11, 2015, at approximately 8:02 p.m., ANTOINE DORTCH called AILYSON CLIPPER on the telephone. During the conversation, DORTCH stated, "I just hope that n**** give us something (LEARDRUS BURRIS gives DORTCH and CLIPPER heroin). If he ain't, I'm gonna have to spend at least about three. At least about three try to

make at least five, fifty five maybe six. I can't sit here and play with him if he ain't try to duck and dodge me. Cause he made a promise he can't keep (DORTCH was anticipating getting at least three grams of heroin from BURRIS and would add an adulterant/cutting agent to the three grams to make either five and a half grams or six grams)." CLIPPER said, "Right, well I hope that ain't the case." DORTCH replied, "Yeah, I hoping that ain't the case either, I gotta go in there... shit." CLIPPER replied, "(UI) Will be cool I'll just hang out 'till you come home." DORTCH replied, "Whatever you do if he (BURRIS) do bring that shit (heroin) tomorrow I need you to go blow down, I need to talk to him, too... Rush that to him (BURRIS)."

- 90. On or about February 17, 2015, at approximately 9:16 a.m., EMERY LEE called ANTOINE DORTCH on the telephone. LEE asked, "Hey, hold me at least three" (three grams of heroin). You know I got this thing on and it, it's limited but I'll be through. Hopefully by between one and two." DORTCH replied, "Okay."
- 91. On or about February 26, 2015, at approximately 12:24 p.m., ANTOINE

 DORTCH called AILYSON CLIPPER on the telephone. CLIPPER said, "Rhonda (RHONDA

 COLLINS) keep calling me. I texted and see if he (LEARDRUS BURRIS) can let me hold ten
 (get fronted ten grams of heroin) and he ain't even say shit." DORTCH said, "You said what?"

 CLIPPER said, "Be sure he can let me hold ten." DORTCH said, "He ain't say nothing?"

 CLIPPER said, "Ah huh!" DORTCH said, "Lee Lee?" CLIPPER said, "Yeah." DORTCH said,
 "He probably want his money. Who's calling?" CLIPPER said, "Rhonda (RHONDA

 COLLINS)." DORTCH asked, "Rhonda?" CLIPPER said, "His (EMERY LEE) girl."

 DORTCH later said, "That n**** probably want his money (BURRIS wanted paid for the
 heroin rather than front it). I don't, why he ain't text back. ... Call him (BURRIS) for me and
 I'll see what's up. That's what she (COLLINS) want?" CLIPPER said, "No, I mean but I'm

running out, run out (CLIPPER was out of heroin)." DORTCH said, "Ok. Call him for me really quick." CLIPPER placed DORTCH on hold to attempt a three-way call with LEARDRUS BURRIS. BURRIS did not answer and CLIPPER returned to her conversation with DORTCH.

- 92. On or about March 21, 2015, at approximately 6:12 p.m., LEARDRUS BURRIS called ANTOINE DORTCH on the telephone. BURRIS said, "You know that was way off." DORTCH said, "What you mean?" BURRIS said, "Was that 25 you gave me (\$2,500)?" DORTCH said, "Oh, hold on. Let me count again." DORTCH said, "Oh, hell no, man. You got me f****d, what the f*** are you talking about?" BURRIS said, "I'm, ah, yeah, because I'm counting it right now. Hold on, let me ..." DORTCH said, "Yeah." BURRIS said, "Counted it. ... I'm missing like a whole six, seven, eight hundred dollars." DORTCH said, "Hell, man. I swear to, remember I kept giving it to you at a time like, huh. Here you go, another one, here you go." BURRIS said, "\$900. I counted one of them bands and it was only \$900 in that one."
- 93. On or about April 2, 2015, LEARDRUS BURRIS possessed approximately 47.6 grams of heroin, \$2,005 in U.S. currency, a drug ledger, marijuana, drug paraphernalia, and cellular telephones at his residences on Clyde Avenue in Cuyahoga Falls, Ohio, and Kelly Avenue in Akron, Ohio.
- 94. On or about May 29, 2015, REGINALD BLAIR possessed a Springfield Armory .45 caliber semi-automatic pistol with serial number N559911, a Ruger P-89 9mm semi-automatic pistol with serial number 314-46215, various glass vials with pharmaceuticals contained therein, marijuana, a digital scale, a PACA Kevlar bulletproof vest, 69 marijuana plants, Kimber 1911 style magazine in .45 caliber, and ammunition at his residence on Sycamore Street in Akron, Ohio.

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

The Grand Jury further charges:

On or about September 17, 2010, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant REGINALD BLAIR, aka FLAV, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

The Grand Jury further charges:

On or about September 28, 2010, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant REGINALD BLAIR, aka FLAV, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

The Grand Jury further charges:

On or about April 16, 2013, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant EMERY LEE, aka MULEHEAD, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

The Grand Jury further charges:

On or about May 29, 2013, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant REGINALD BLAIR, aka FLAV, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

The Grand Jury further charges:

On or about January 28, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant EMERY LEE, aka MULEHEAD, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

The Grand Jury further charges:

On or about August 6, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant EMERY LEE, aka MULEHEAD, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

The Grand Jury further charges:

On or about August 6, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant EMERY LEE, aka MULEHEAD, did knowingly and intentionally possess with the intent to distribute and distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 9

The Grand Jury further charges:

On or about January 17, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants EMERY LEE, aka MULEHEAD and RHONDA COLLINS, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine and cocaine base ("crack"), Schedule II controlled substances, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 10

The Grand Jury further charges:

On or about April 2, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant LEARDRUS BURRIS, aka LEE LEE, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

The Grand Jury further charges:

On or about December 9, 2014, in the Northern District of Ohio, Eastern Division, DEMOND BAKER, aka MONTE, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, those being: Possession of Cocaine, in case number CR-2004-09-3242, in the Court of Common Pleas, Summit County, Ohio, on or about June 20, 2005, and Failure to Comply with the Order or Signal of a Police Officer and Assault on a Police Officer, in case number CR-2000-10-2543, in the Court of Common Pleas, Summit County, Ohio, on or about March 13, 2001, did knowingly possess in and affecting interstate and foreign commerce, firearms, to-wit: a Taurus 9mm handgun, serial number TZH88842 and ammunition, said firearms and ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 12

The Grand Jury further charges:

On or about May 29, 2015, in the Northern District of Ohio, Eastern Division, REGINALD BLAIR, aka FLAV, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, those being: Aggravated Drug Trafficking, in case number CR-1990-06-1120, in the Court of Common Pleas, Summit County, Ohio, on or about October 11, 1990; and Aggravated Drug Trafficking, in case number CR-1992-12-2983, in the Court of Common Pleas, Summit County, Ohio, on or about February 10, 1993, did knowingly possess in and affecting interstate and foreign commerce, firearms, to-wit: a Springfield Armory

1911 .45 caliber semi-automatic pistol, serial number N559911, a Ruger P-89 9mm semi-automatic pistol, serial number 314-46215, and ammunition, said firearms and ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 13

The Grand Jury further charges:

On or about January 17, 2015, in the Northern District of Ohio, Eastern Division, EMERY LEE, aka MULEHEAD, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, those being: Drug Abuse, in case number CR-1985-07-0795, in the Court of Common Pleas, Summit County, Ohio, on or about June 20, 1986, Possession of Cocaine, in case number 89001838, in the Morris County, New Jersey, Superior Court, on or about November 12, 1991, did knowingly possess in and affecting interstate and foreign commerce, firearms, to-wit: a Davis Industries .380 caliber handgun, serial number AP038629, a Davis Industries P-25, .25 caliber handgun, serial number 074287, and ammunition, said firearms and ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 14

The Grand Jury further charges:

On or about January 17, 2015, in the Northern District of Ohio, Eastern Division, RHONDA COLLINS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, those being: Illegal Conveyance of Drugs onto grounds of a Governmental Facility, in case number 2011-04-0958, in the Court of Common Pleas, Summit

County, Ohio, on or about June 7, 2011, and Aggravated Trafficking in Drugs, in case number CR-1998-02-0455, in the Court of Common Pleas, Summit County, Ohio, on or about April 6, 1998, did knowingly possess in and affecting interstate and foreign commerce, firearms, to-wit: a Davis Industries .380 caliber handgun, serial number AP038629, a Davis Industries P-25, .25 caliber handgun, serial number 074287, and ammunition, said firearms and ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNTS 15 - 51

The Grand Jury further charges:

On or about the dates and times listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants listed below did knowingly and intentionally use any communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846; that is conspiracy to possess with the intent to distribute and to distribute heroin and cocaine as charged in Count 1:

Count	Defendant(s)	Date	Time
15	TYRONE ALLEN, aka TY, aka LANDLORD, EMERY LEE, aka MULEHEAD	September 25, 2014	1:37 p.m.
16	COLLIE BROOKS, EMERY LEE, aka MULEHEAD	September 25, 2014	9:23 p.m.
17	TYRONE ALLEN, aka TY, aka LANDLORD, EMERY LEE, aka MULEHEAD	September 26, 2014	9:22 a.m.
18	RHONDA COLLINS, EMERY LEE, aka MULEHEAD	September 26, 2014	11:07 a.m.
19	SHARAE RAMSEY, EMERY LEE, aka MULEHEAD	October 2, 2014	7:02 p.m.

20	REGINALD BLAIR, aka FLAV, EMERY LEE, aka MULEHEAD	October 6, 2014	10:39 p.m.
21	SHARAE RAMSEY, EMERY LEE, aka MULEHEAD	October 12, 2014	12:21 p.m.
22	LARRY DIXON, EMERY LEE, aka MULEHEAD	October 17, 2014	5:33 p.m.
23	GEORGE LOCKE, JR., aka G, EMERY LEE, aka MULEHEAD	October 17, 2014	11:04 p.m.
24	KYLE BALLARD, EMERY LEE, aka MULEHEAD	October 17, 2014	11:19 p.m.
25	LESLY PICHARDO FELIZ, EMERY LEË, aka MULEHEAD	October 22, 2014	11:31 p.m.
26	LESLY PICHARDO FELIZ, EMERY LEE, aka MULEHEAD	October 24, 2014	3:46 a.m.
27	LARRY SMOOT, aka L, EMERY LEE, aka MULEHEAD	October 24, 2014	10:14 a.m.
28	LARRY SMOOT, aka L, EMERY LEE, aka MULEHEAD	October 27, 2014	12:58 p.m.
29	ORLANDO REED, aka MEECH, EMERY LEE, aka MULEHEAD	October 31, 2014	4:23 p.m.
30	KYLE BALLARD, EMERY LEE, aka MULEHEAD	November 1, 2014	11:08 p.m.
31	ORLANDO REED, aka MEECH, EMERY LEE, aka MULEHEAD	November 2, 2014	1:21 p.m.
32	REGINALD BLAIR, aka FLAV, EMERY LEE, aka MULEHEAD	November 2, 2014	3:33 p.m.
33	RHONDA COLLINS, EMERY LEE, aka MULEHEAD	November 3, 2014	9:45 a.m.
34	RONNIE JOHNSON, JR., EMERY LEE, aka MULEHEAD	November 5, 2014	7:50 p.m.

35	RONNIE JOHNSON, JR., EMERY LEE, aka MULEHEAD	November 6, 2014	10:33 a.m.
36	DIVINE DANIELS, EMERY LEE, aka MULEHEAD	November 7, 2014	12:34 p.m.
37	DIVINE DANIELS, EMERY LEE, aka MULEHEAD	November 7, 2014	3:30 p.m.
38	DAVID ROBINSON, aka DAWUD, EMERY LEE, aka MULEHEAD	November 10, 2014	7:28 p.m.
39	DAVID ROBINSON, aka DAWUD, EMERY LEE, aka MULEHEAD	November 11, 2014	10:13 p.m.
40	DEMOND BAKER, aka MONTE, EMERY LEE aka MULEHEAD	November 19, 2014	7:15 p.m.
41	ANGEL PICHARDO-MARTINEZ, aka MICKEY, EMERY LEE, aka MULEHEAD	November 20, 2014	9:38 a.m.
42	AILYSON CLIPPER, EMERY LEE, aka MULEHEAD	November 21, 2014	4:34 p.m.
43	DEMOND BAKER, aka MONTE, EMERY LEE, aka MULEHEAD	November 22, 2014	10:04 a.m.
44	AILYSON CLIPPER, EMERY LEE, aka MULEHEAD	November 24, 2014	11:49 a.m.
45	ANGEL PICHARDO-MARTINEZ, aka MICKEY, EMERY LEE, aka MULEHEAD	November 25, 2014	3:18 p.m.
46	GEORGE LOCKE, JR., aka G, EMERY LEE, aka MULEHEAD	December 3, 2014	8:40 p.m.
47	LARRY DIXON, EMERY LEE, aka MULEHEAD	December 11, 2014	6:40 p.m.
48	COLLIE BROOKS, EMERY LEE, aka MULEHEAD	December 12, 2014	9:08 p.m.
49	AILYSON CLIPPER, LEARDRUS BURRIS	February 6, 2015	10:12 a.m 4:36 p.m.

50 AILYSON CLIPPER, LEARDRUS BURRIS

February 9, 2015

11:30 a.m. – 7:15 p.m.

51 EMERY LEE, aka MULEHEAD, ANTOINE DORTCH

February 17, 2015

9:16 a.m.

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

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 51, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, defendants EMERY LEE, aka MULEHEAD, ANGEL PICHARDO-MARTINEZ, aka MICKEY, LESLY PICHARDO FELIZ, ANTOINE DORTCH, AILYSON CLIPPER, LEARDRUS BURRIS, RONNIE JOHNSON, JR., LARRY SMOOT, aka L, KYLE BALLARD, COLLIE BROOKS, DEMOND BAKER, aka MONTE, TYRONE ALLEN, aka TY, aka LANDLORD, RHONDA COLLINS, SHARAE RAMSEY, DAVID ROBINSON, aka DAWUD, DIVINE DANIELS, ORLANDO REED, aka MEECH, GEORGE LOCKE, JR., aka G, REGINALD BLAIR, aka FLAV, and LARRY DIXON, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and, any and all property (including firearms and ammunition) involved in or used in the commission of such violations; including, but not limited to, the following:

- A. Davis Industries .380 caliber handgun, serial number AP038629;
- B. Davis Industries P-25, .25 caliber handgun, serial number 074287;

- C. Springfield Armory 1911 .45 caliber semi-automatic pistol, serial number N559911;
- D. Ruger P-89 9mm semi-automatic pistol, serial number 314-46215;
- E. Taurus 9mm handgun, serial number TZH88842;
- F. Kimber 1911 style magazine in .45 caliber;
- G. PACA Kevlar bulletproof vest; and
- H. Miscellaneous ammunition.

A TRUE BILL.

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