

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER HENDERSON,
JOHN L. PHILLIPS (a/k/a "JoJo"), and
JAIQAIL WRIGHT (a/k/a "Jaigail Wright")

CASE NUMBER:

UNDER SEAL

FILED

MAY - 9 2018

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT MAGISTRATE JUDGE VALDEZ

18CR 284

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

Count One

From in or around September 2016 to August 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

*Code Section*Title 18, United States Code,
Sections 922(a)(1)(A) and 2*Offense Description*

CHRISTOPHER HENDERSON, JOHN L. PHILLIPS (a/k/a "JoJo"), and JAIQAIL WRIGHT (a/k/a "Jaigail Wright"), defendants herein, willfully engaged in the business of dealing in firearms without being licensed firearms dealers, in violation of 18 U.S.C. §§ 922(a)(1)(A) and 2.

Count Two

On or about August 24, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section*Title 18, United States Code, Section
922(g)(1)*Offense Description*

JOHN L. PHILLIPS (a/k/a "JoJo"), defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Glock model 22, .40 caliber pistol, bearing serial number EEZ363, and a Glock model 26, 9mm pistol, bearing serial number UCY868, which

firearm had traveled in interstate commerce prior to defendant's possession of the firearm, in violation of 18 U.S.C. § 922(g)(1).

This criminal complaint is based upon these facts:


X Continued on the attached sheet.


JASON VACHY

Task Force Officer, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Sworn to before me and signed in my presence.

Date: May 9, 2018


Judge's signature

City and state: Chicago, Illinois

MARIA VALDEZ, United States Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SS

AFFIDAVIT

I, JASON VACHY, being duly sworn, state as follows:

1. I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have been so employed since approximately 2007. My current responsibilities include the investigation of criminal violations relating to the federal firearms laws, including Title 18, United States Code, Section 922.

2. This affidavit is submitted in support of a criminal complaint alleging that CHRISTOPHER HENDERSON, JOHN L. PHILLIPS (a/k/a "JoJo"), and JAIQAIL WRIGHT (a/k/a "Jagail Wright") have violated Title 18, United States Code, Section 922(a)(1)(A), and that PHILLIPS has violated Title 18, United States Code, Section 922(g)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HENDERSON, PHILLIPS, and WRIGHT with engaging in the business of dealing in firearms without being licensed firearms dealers, in violation of 18 U.S.C. § 922(a)(1)(A), and charging PHILLIPS with unlawful possession of a firearm by a felon, in violation of 18 U.S.C. § 922(g)(1), I have not included each fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts.

FACTS SUPPORTING PROBABLE CAUSE

INTRODUCTION AND BACKGROUND OF THE INVESTIGATION

4. Since in or around May 2017, ATF has been investigating the illegal flow of firearms from Kentucky into Chicago, Illinois. Specifically, between in or around September 2016 and in or around August 2017, CHRISTOPHER HENDERSON and JOHN L. PHILLIPS (a/k/a "JoJo") purchased firearms from various private sellers in Kentucky and trafficked the firearms back from Kentucky to Chicago, Illinois. Once back in Chicago, PHILLIPS and HENDERSON resold, transferred, and/or delivered the firearms, often on Facebook and often with the assistance of JAIQAIL WRIGHT (a/k/a "Jaigail Wright"). Several of these firearms were subsequently recovered by law enforcement during crimes committed in the Chicago area, sometimes mere weeks after PHILLIPS and/or HENDERSON purchased them in Kentucky.

5. As explained in further detail below, PHILLIPS and HENDERSON purchased firearms from persons they met via a website called Armslist.com. Armslist.com is a website dedicated to the sale and/or trade of firearms and firearm-related items, such as magazines, ammunition and gun parts between private parties. A person interested in selling a firearm can post an advertisement about the firearm on the Armslist website. An interested buyer can then click on a box titled "Contact Seller" and communicate with the seller. Using different email addresses

and different names, PHILLIPS and HENDERSON contacted sellers in Kentucky via Armslist, and other means, to arrange to purchase specific firearms.

6. PHILLIPS and HENDERSON then met the sellers in Kentucky, often driving PHILLIPS' vehicle—a 2016 white Dodge Challenger, bearing Illinois license plate number Z249675¹ (hereinafter, "Phillips Vehicle 1"). PHILLIPS and HENDERSON purchased the firearms and then transported the firearms back to Chicago in order to resell, transfer, and/or deliver the firearms to individuals in the Chicago area.

7. JAIQAIL WRIGHT often assisted PHILLIPS and HENDERSON with reselling the firearms to buyers in the Chicago area. In particular, WRIGHT, who acted as a broker, worked with HENDERSON and PHILLIPS, through the use of Facebook and other means, to advertise and broker the illegal sale of firearms to various Chicago residents. According to ATF records, HENDERSON, PHILLIPS and WRIGHT do not hold a Federal Firearm License ("FFL").

8. After the firearms were resold to the buyers in the Chicago area, many were recovered by the Chicago Police Department ("CPD") and other law enforcement agencies. The time to crime for the firearms discussed in this Affidavit varies. For example, at least one firearm was recovered in Chicago approximately three days

¹ According to Illinois Secretary of State vehicle registration records, up until on or about January 27, 2018, PHILLIPS was the owner of Phillips Vehicle 1. Specifically, the records show that Phillips Vehicle 1 was registered to PHILLIPS at 610 North Wolf Road, Apartment 4, Hillside, Illinois 60162 ("the Hillside Residence"). According to vehicle registration records, as of on or about January 27, 2018, Phillips Vehicle 1 appears to be owned by someone unrelated to this investigation.

after it was purchased in Kentucky, and other firearms were recovered within weeks or months after they were purchased in Kentucky. Typically, the time to crime refers to the period of time between the original purchase of a firearm and the recovery of that firearm by law enforcement at a crime scene. Throughout this Affidavit, the time to crime refers to the time period between when HENDERSON and PHILLIPS purchased the firearms from various Kentucky residents to when the firearms were recovered at various crime scenes in Chicago. Based on my training and experience, a short time to crime is indicative of firearms trafficking. Individuals involved in firearm trafficking often sell firearms to people who have to deal in the illegal firearm market, because they are prohibited from legally obtaining firearms. This illegal market often results in firearms being recovered at crime scenes. The short time to recovery demonstrates that HENDERSON and PHILLIPS sold the purchased firearms very quickly, in many instances mere weeks after they were purchased.

9. This Affidavit contains three main sections. The first section details the means by which HENDERSON and PHILLIPS sold firearms to WRIGHT, who acted as a broker (*see* ¶¶ 10 - 45). Specifically, on multiple occasions, HENDERSON and PHILLIPS used Facebook to communicate with WRIGHT about firearms they had for sale, including the types of firearms they had available and the prices of the firearms. The second section of this Affidavit explains how PHILLIPS and HENDERSON purchased firearms in Kentucky, including how PHILLIPS and HENDERSON identified gun sellers and straw purchasers from which to obtain firearms for the purpose of later reselling, transferring, and/or delivering them to

WRIGHT and other individuals in the Chicago area (*see* ¶¶ 46 - 95). Finally, the third section of this Affidavit details instances where law enforcement recovered firearms that were originally purchased in Kentucky directly from HENDERSON and PHILLIPS (*see* ¶¶ 96 - 116).

HENDERSON, PHILLIPS AND WRIGHT ENGAGE IN ILLEGAL FIREARMS
SALES THROUGH FACEBOOK

10. In summary, during the course of this investigation, agents located Facebook accounts believed to belong to HENDERSON,² PHILLIPS,³ and WRIGHT.⁴

² Law enforcement identified HENDERSON's Facebook account as follows: On or about August 2017, through the use of a covert Facebook account, investigators discovered a publicly available Facebook page under the name "Chris Henderson." Investigators identified HENDERSON as the account user based on the voluminous number of photographs of HENDERSON posted on the account. For example, in one of the photographs posted on HENDERSON Facebook Account, HENDERSON is depicted standing in front of a residence located on the 900 block of North Central Park Avenue, Chicago, Illinois. The address is visible in the photograph. According to Illinois Secretary of State records, this is HENDERSON's last known Chicago address. Based on a comparison of HENDERSON's booking photograph and prior surveillance observations, law enforcement identified HENDERSON as the person depicted in the photographs of the HENDERSON Facebook Account.

³ Law enforcement identified PHILLIPS' Facebook account as follows: Through a search of HENDERSON's Facebook "friends," agents discovered a publicly available Facebook page under the name "Jojo A'mf" ("PHILLIPS Facebook Account") believed to belong to PHILLIPS. Investigators observed several photographs posted to the account depicting PHILLIPS. Based on a comparison of PHILLIPS' booking photograph and prior surveillance observations, law enforcement identified PHILLIPS as the person depicted in the photographs of the PHILLIPS (Jojo A'mf) Facebook account.

⁴ Law enforcement identified WRIGHT's Facebook account as follows: Numerous photographs and videos of WRIGHT posted on the account depicted known photographs of WRIGHT. For example, investigators observed a photograph of WRIGHT in front of a residence. The address for the residence is visible in black lettering on an address plaque. The plaque is in front of the residence next to the front door of the residence. Based on previous surveillance observations of the residence, law enforcement believes that the residence depicted in the photograph is located on the 900 block of North Central Park Ave., Chicago, Illinois. According to most recent Illinois driver's license issued to WRIGHT the address listed on the license is located on the 900 block of North Central Park Avenue, Chicago, Illinois.

Based on a review of the publicly available information on WRIGHT's Facebook account, and of records obtained from a federal search warrant, law enforcement observed several messages exchanged between HENDERSON, PHILLIPS, and WRIGHT regarding the illegal sale of firearms. Throughout 2017, HENDERSON and PHILLIPS contacted WRIGHT on Facebook repeatedly to broker firearm sales in the city of Chicago. Most of the contacts occurred while or after HENDERSON and PHILLIPS returned from purchasing firearms in Kentucky. In many instances, HENDERSON and PHILLIPS provided WRIGHT with the make and prices of the firearms, which were in some cases, approximately 50% to 100% above the retail value of the firearms.

WRIGHT Assisted HENDERSON With Reselling a Firearm That Was Purchased by Individual Q in Kentucky

11. In summary, on or about February 8, 2017, WRIGHT was depicted in a Facebook photograph with two Glock pistols, one of which, according to ATF records, was originally owned by a gun seller located in Kentucky just 11 days before the Facebook photo. On or about June 9, 2017, during a traffic stop in Chicago, CPD recovered another Glock pistol originally owned by the same gun seller in Kentucky who, along with his/her spouse, admitted to engaging in numerous private firearms sales. Phone records show multiple contacts between Individual R and the user of a number believed to be used by HENDERSON, 502-XXX-6682 (hereinafter, "Henderson Pinger 6682"),⁵ between February 27, 2017 and March 3, 2017.

⁵ Law enforcement identified HENDERSON as the user of Henderson Pinger 6682 based on the following: According to records obtained from Pinger, the telephone number for

12. More specifically, through the use of a covert account, law enforcement observed a video posted on WRIGHT's Facebook account, on or about February 8, 2017, depicting WRIGHT and HENDERSON together inside a vehicle. Based upon my review of the video, WRIGHT is positioned in the front passenger seat of the vehicle, and appears to be rapping along with the background music. HENDERSON is the driver of the vehicle. WRIGHT is dressed in a dark grey hooded sweatshirt with a "True Religion" emblem and matching dark grey sweatpants with white stitching. Law enforcement further observed another photograph posted to WRIGHT's Facebook account on or about February 8, 2017, which depicts two Glock pistols positioned on an individual's lap. The individual's face is not visible in the photograph. However, the individual is dressed in sweat pants with white stitching and draw strings. Based on a comparison of the sweat pants depicted in the aforementioned video and photograph, it is believed that WRIGHT is the individual holding the two Glock pistols on his lap.

Henderson Pinger 6682 was created using the telephone number for Henderson Phone 1. Specifically, on or about June 10, 2016, Henderson Phone 1 was used to register Henderson Pinger 6682 with Pinger. Pinger is a company that develops applications that can be run on cellular phones, among other devices. Pinger's applications allow for messaging, calling services, and other call management tools. It is a free application that adds a second phone number to a cellular telephone to keep the device's main number private. Pinger also provides a service called "Textfree," which is a free app that allows users to send and receive text messages, as well as make and receive phone calls utilizing a third party's network connection, such as a carrier's data or Wi-Fi network. Once an individual obtains a second phone number through Pinger's services, the individual can use that phone number on any device – it does not have to be used on the device that was used to obtain the phone number. Notably, the area code used to create the telephone number for Henderson Pinger 6682 ("502") is the area code for north-central Kentucky, including the city of Louisville, Kentucky.

13. Agents further observed public comments posted underneath the aforementioned photograph on WRIGHT's Facebook account. For example, on or about February 8, 2017, the following exchange occurred between WRIGHT and Individual O, a gun buyer, regarding the firearms:

Individual O: I see u my boy [emojis]

WRIGHT: [Emojis]

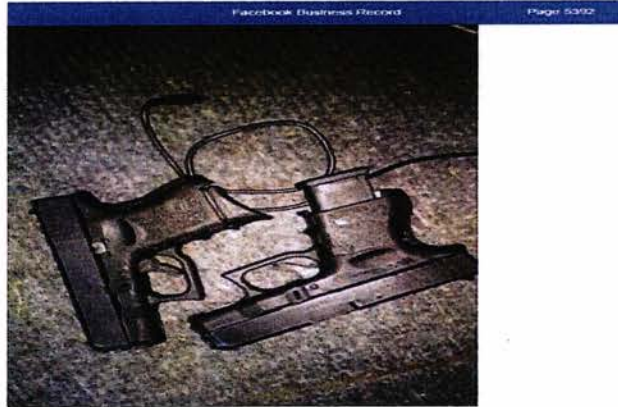
Individual O: Wat dem is G27's [Glock model 27] or G26's
[Glock model 26]?

WRIGHT: 27 [Glock model 27]

Individual O: [emojis] Check yo inbox

Based on my training and experience, I believe that Individual O was inquiring about the model number of the Glock pistols. The last message from Individual O, which reads "Check yo inbox," suggests that Individual O sent WRIGHT a private message regarding the firearms. The Facebook records from WRIGHT's account confirm that Individual O sent WRIGHT a message about the guns. Specifically, on or about February 8, 2018, Individual O sent the following messages to WRIGHT:

Individual O:



Individual O: Got da same ones [Got the same ones]

14. In another public comments dialogue underneath the February 8, 2017 photograph on WRIGHT's Facebook account, Individual P, a gun buyer, and WRIGHT had the following exchange:

Individual P: How much fa both

WRIGHT: They gone

Based on my training and experience, I believe that Individual P was inquiring about the purchase price for the two Glock pistols depicted in the photograph. WRIGHT responded by suggesting that the firearms had been already sold.

15. In the photograph, the serial number "KEB655" is visible on the slide of one of the Glock pistols. Through a search of a law enforcement database, law enforcement discovered that the firearm bearing serial number "KEB655" (a Glock model 27, .40 caliber pistol) was purchased, on or about January 28, 2017, along with an additional Glock model 27, .40 caliber pistol and a Glock model 22, .40 caliber pistol, with serial number MUZ886. Records show that the three firearms were

purchased by Individual Q, a gun seller and Kentucky resident, at Washington Trading Company, LLC ("Washington Trading"), located in Lexington, Kentucky.

16. According to police reports, on or about June 9, 2017, at the location of 7445 S. Harvard, Avenue in Chicago, CPD arrested Individual S after officers observed Individual S drinking alcohol while seated in the passenger seat of a vehicle parked on a public way. Officers approached Individual S and asked him/her to exit the vehicle. Individual S gave officers verbal consent to search the vehicle. During the search, officers recovered a Glock model 22, .40 caliber pistol, with serial number MUZ886, loaded with thirteen rounds in the magazine and one round in the chamber. The firearm was recovered from underneath Individual S's car seat. Individual S, a convicted felon, was charged with an ordinance violation and weapons offense.⁶

17. Based on a search of a law enforcement database, law enforcement discovered that the aforementioned firearm bearing serial number "MUZ886" was one of the Glock pistols purchased by Individual Q from Washington Trading in Lexington, Kentucky, on or about January 28, 2017.

18. Law enforcement interviewed Individual Q and his/her spouse, Individual R, regarding the recovery of the Glock pistol. During the interview, Individual Q provided the following information:

a. Individual Q did not currently possess any of the firearms he/she purchased from Washington Trading records on January 28, 2017; and

⁶ Individual S's case was dismissed in the Circuit Court of Cook County.

b. Individual Q often accompanied Individual R to gun shows in Kentucky and allowed Individual R to sell the firearms he/she purchased on January 28, 2017.

19. When interviewed, Individual R provided the following information:

a. Individual R purchased, sold, and traded guns at Kentucky gun shows and also on a website called Armslist.com;

b. Individual R was interviewed by ATF agents in or around March 2017 about his/her private firearms sale transactions and during the interview he was served a "Warning Notice of Unlicensed Firearms Dealing in Violation of Federal Law;"⁷

c. Individual R did not have any records of past firearm transactions from gun shows;

d. Individual R assured that each buyer had a Kentucky identification card prior to conducting any private firearms transactions, but did not execute a bill of sale to document the transaction; and

e. Individual R stated that he/she had not sold or traded guns since he received the warning notice from ATF on or about March 14, 2017.

f. Individual R also confirmed that his/her cellular telephone number was 859-XXX-6451, and had been for several years.

⁷ The "Warning Notice of Unlicensed Firearms Dealing in Violation of Federal Law" is a notice issued by ATF to individuals who do not possess an FFL license, and therefore, are prohibited from engaging in the business of dealing firearms without a license. This warning notice is often referred to as a "Cease and Desist" letter.

20. According to law enforcement records, between January 23, 2015 and February 3, 2017, Individual Q and Individual R purchased more than forty firearms. Records further show that nine of those firearms have been recovered from various crime scenes in the Chicagoland area, involving felon in possession of a firearm, unlawful use of a weapon, aggravated assault of a weapon, and narcotics related offenses.

21. Phone records show that, between February 27, 2017 and March 3, 2017, there were approximately eight incoming and outgoing phone calls between Individual R's telephone number and Henderson Pinger 6682 number.

22. Accordingly, Individual R purchased two Glock pistols on January 28, 2017 in Kentucky, and by February 8, 2017, approximately 11 days later, one of the firearms appeared in a Facebook photo on WRIGHT's lap.

WRIGHT Brokered Firearms Transaction between HENDERSON and Individual JJ through Facebook On or About January 4, 2017

23. In summary, on or about January 4, 2017, HENDERSON and WRIGHT engaged in a series of Facebook message exchanges, wherein WRIGHT brokered the sale of a .45 caliber pistol between HENDERSON and Individual JJ, a convicted felon.

24. On or about January 4, 2017, law enforcement observed the following Facebook exchange between HENDERSON and WRIGHT:

HENDERSON: Wassup [What's up] bro

WRIGHT: U ready

HENDERSON: What they talkin

WRIGHT: He got 700

HENDERSON: Ight [ok] hold on

WRIGHT: Send pic

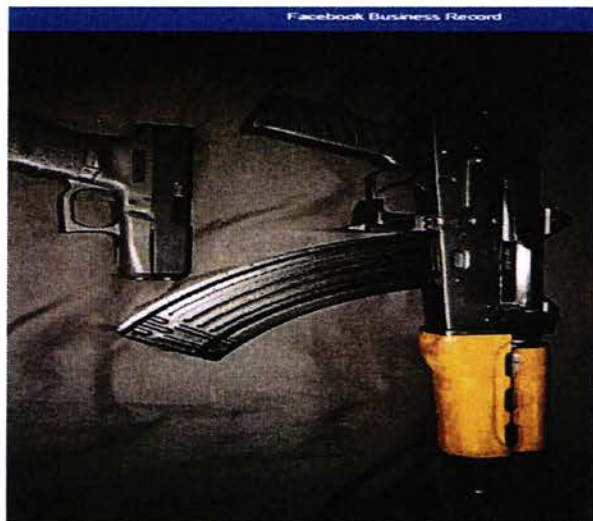
HENDERSON: Just did

HENDERSON: 2k [\$2,000]

WRIGHT: [thumbs up sticker]

HENDERSON: U got it or no

HENDERSON:



HENDERSON: Wassup [What's up]

WRIGHT: That's it

HENDERSON: Rn yea [Right now yeah]

HENDERSON: They won't sum [They want some]

WRIGHT: That's glock wat [That Glock is what]

HENDERSON: 45 [.45 caliber]

HENDERSON: They coo like always? Lol [They cool like always?
Laugh Out Loud]

WRIGHT: He sad for 700 [He said for \$700]

HENDERSON: I told u ok what they wanna do I ain't coming on the
block doe [I told you ok. What do they want to do. I
am not coming to them]

WRIGHT: He sad where u trying meet

HENDERSON: Might have to come to me I ain't driven

HENDERSON: I'm n Maywood rn

WRIGHT: Ight

HENDERSON: Let me knw wasup

WRIGHT: They got wheel [they have a car]

WRIGHT: I'm about to come

HENDERSON: Let me knw when y'a'll on y'all way bro

WRIGHT: Wats address

HENDERSON: Hold on Finna get it

WRIGHT: You can't meet me at other spot

WRIGHT: Yoo

WRIGHT: [Facebook video call - incomplete]

WRIGHT: [Facebook video call - incomplete]

WRIGHT: Yo we ready

HENDERSON: U said u wasn't coming out here?

HENDERSON: I just called u

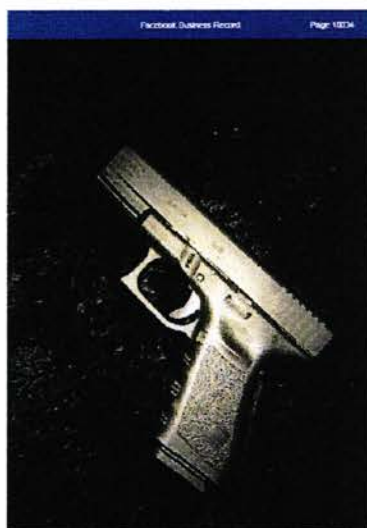
WRIGHT: Yeah

WRIGHT: We coming

WRIGHT: Adress

HENDERSON: [Facebook video call - incomplete]

HENDERSON:



HENDERSON: It say yo like busy

HENDERSON: I can't answer yo call

WRIGHT: ,address

HENDERSON: 11 and Harvard

WRIGHT: The address not popping up

HENDERSON:



HENDERSON: Get on 290 get off on 9th and make a left make a right on Roosevelt then a right on 11th come two block I'm on the corner

WRIGHT: Give me address

HENDERSON: I just did nigga lol

HENDERSON: 2012 s 11th Ave just go there

HENDERSON: Wya [Where You At]

WRIGHT: Omw [On My Way]

WRIGHT: U got a beamer for sell [You have a laser sight for sale]

HENDERSON: No mf gon [No motherfucker gone]

WRIGHT: We here

25. Based on my training and experience, I believe HENDERSON was offering to sell a Glock pistol and an "AK-47" style pistol for \$2,000. WRIGHT was

acting as an intermediary for the sale and informed HENDERSON the buyer was willing to pay \$700 for the Glock .45 caliber pistol. HENDERSON also informed WRIGHT these are the only firearms for sale at this time. HENDERSON and WRIGHT next discussed the meeting location where the firearms transaction would occur.

26. On or about January 4, 2017, WRIGHT received a Facebook message from an account associated with Individual JJ, a gun buyer.⁸ Law enforcement observed the following Facebook exchange between WRIGHT and Individual JJ:

Individual JJ: What's yo # [What's your number]

Individual JJ: [Facebook video call - incomplete]

Individual JJ: [Facebook video call - incomplete]

WRIGHT: 773***4617⁹

Individual JJ: I just called

WRIGHT: Got a block 4.5 in drako [Got a Glock .45 caliber pistol and Draco pistol]

Individual JJ: How much.

Individual JJ: For Glock 4.5[.45 caliber Glock] \$700

WRIGHT: Yeah

⁸ Individual JJ has been identified by law enforcement and has a 2016 felony theft conviction in Cook County, Illinois.

⁹ According to records from the service provider, the phone number ending in 4617 was subscribed to Individual KK of Chicago. A review of WRIGHT's Facebook account revealed that Individual KK was in a relationship with WRIGHT.

Individual JJ: Ight come on where wannameet [Alright come on
where do you want to meet]

Individual JJ: ?

WRIGHT: Bout to see wya [About to see Where You At]

WRIGHT: U got wheel [You have a car]

Individual JJ: Wya [Where You At]

WRIGHT: [Facebook video call - incomplete]

Individual JJ: [Facebook video call - incomplete]

Individual JJ: Wya

Individual JJ: Give me a min

Individual JJ: Here I come

WRIGHT: Ight [Alright]

WRIGHT: Yoo

Individual JJ: [Facebook video call - incomplete]

WRIGHT: Bout to go home

Individual JJ: I'm on my way boy had to get jump

WRIGHT: Wya [Where You At]

Individual JJ: Jackson Cicero

Individual JJ: Coming down Hamlin

WRIGHT: Ight [Alright]

Individual JJ: Wya [Where You At]

Individual JJ: I'm on cello [I'm on Monticello]

WRIGHT: Come on cp back [Come on Central Park back]

27. Records from HENDERSON Facebook Account shows that, on or about January 4, 2017, at approximately 8:15 p.m.,¹⁰ HENDERSON sent a Facebook message to WRIGHT and told WRIGHT to meet him at the intersection of 11th Avenue and Harvard Street in Maywood, Illinois. HENDERSON provided WRIGHT directions from Interstate 290. On or about January 4, 2017, at approximately 8:30 p.m., WRIGHT sent HENDERSON a Facebook message that he and Individual JJ had arrived at the designated location. Law enforcement received historical cell site records for a telephone number believed to be used by HENDERSON, 708-XXX-4636 (hereinafter, "Henderson Phone 1").¹¹ The records show that Henderson Phone 1 utilized a cell tower near the Maywood location at the time of this event.

28. Based on my training and experience, I believe Individual JJ picked WRIGHT up from the location of Augusta and Central Park Avenue for the purpose of meeting with HENDERSON to engage in a firearm transaction. I believe that WRIGHT and Individual JJ met HENDERSON at the location of 11th Avenue and

¹⁰ Facebook times are given in UTC and the times in the affidavit have been converted.

¹¹ Law enforcement identified Henderson Phone 1 as a telephone number used by HENDERSON based on the following: According to subscriber information provided by the service provider, Henderson Phone 1 is subscribed to Christopher Henderson at 1161 Mallard Creek Road, Louisville, Kentucky. Additionally, investigators have learned that Henderson Phone 1 is linked to HENDERSON's Facebook account.

Harvard Street in Maywood, where HENDERSON sold the .45 caliber pistol to Individual JJ.

WRIGHT Brokered Firearms Transaction between HENDERSON and An Unidentified Individual through Facebook On or About January 8, 2017

29. In summary, on or about January 8, 2017, WRIGHT engaged in a series of Facebook message exchanges with HENDERSON to arrange the sale of a Draco Pistol to an unidentified individual.

30. Law enforcement observed the following exchange from on or about January 8, 2017, between HENDERSON, using HENDERSON Facebook Account, and WRIGHT, using the WRIGHT Facebook Account:

HENDERSON: Yoo

WRIGHT: Yoo

HENDERSON: Tell yo homie got that Draco [draco style firearm] for him

WRIGHT: How much

HENDERSON: He said 1400 (\$1,400)

WRIGHT: Ight

WRIGHT: My Boi said he got 1,000 [\$1,000]

HENDERSON: No

WRIGHT: Wat u would take

HENDERSON: 1400 that's a deal they going for 1700

HENDERSON: What's the word

WRIGHT: [Facebook video call – incomplete]

WRIGHT: U got a 9 [You got a 9mm pistol]

HENDERSON: [unknown emoji]

WRIGHT: Hun

HENDERSON: Yea

WRIGHT: how much

HENDERSON: 750 w 30 [\$750 with a 30 round magazine]

WRIGHT: Got 675

HENDERSON: Let u know when I get back

WRIGHT: How long he trying to cop [How long? He's trying to
buy]

HENDERSON: Not gone be back fa couple of hours

WRIGHT: Ight

WRIGHT: Yoo

HENDERSON: What he got

HENDERSON: Just got back

WRIGHT: Yoo

HENDERSON: Wassup

WRIGHT: Wat u got

HENDERSON: The 9 with 30 [30 round capacity magazine] and a Draco

HENDERSON: What y'all gone do

HENDERSON: 675 too low I need 750 and 1400

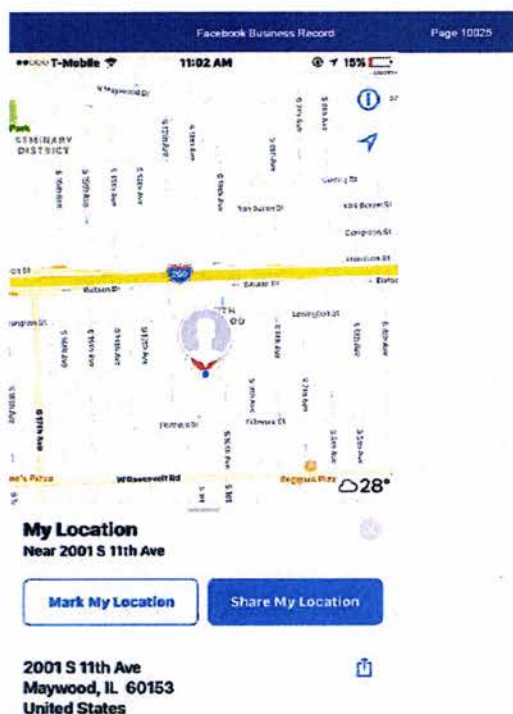
HENDERSON: Wassup

WRIGHT: Say he ain't got that much rite now sad wait till later

WRIGHT: [Facebook video call --{44 seconds}]

WRIGHT: Adress

HENDERSON:



HENDERSON: Wya [Where are you?]

WRIGHT: Bout to come

HENDERSON: Ight how long

WRIGHT: [Facebook video call {379 seconds}]

HENDERSON: [Facebook video call {20 seconds}]

WRIGHT: Wats the number

HENDERSON: What nUmber

WRIGHT: Yo number

HENDERSON: 708[XXX]4636¹²

31. Based on my training and experience, I believe WRIGHT met with HENDERSON to obtain the 9mm and Draco style pistols referenced in the messages exchanged. WRIGHT acted as the intermediary for the firearms transaction and brokered the sale of those firearms to an unidentified individual.

On or About January 13, 2017, WRIGHT and HENDERSON Exchanged Facebook Messages Regarding Engaging in Future Firearms Transactions

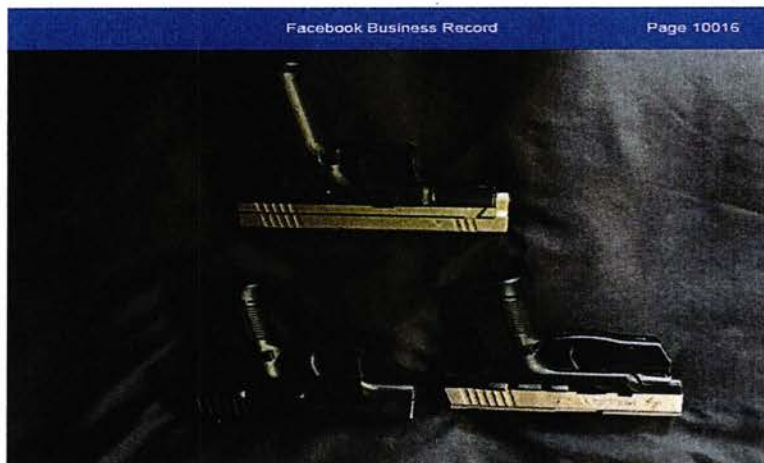
32. In another conversation captured from the WRIGHT Facebook Account search warrant, the following exchange occurred between WRIGHT and HENDERSON, using HENDERSON Facebook Account, on or about January 13, 2017:

HENDERSON: Yo

WRIGHT: Yo

HENDERSON:

¹² As noted above, this telephone number is identified as Henderson Phone 1.



HENDERSON: In order 45 [.45 caliber], 40 [.40 caliber], 40 [.40 caliber] 650 [\$650] for them top 2 and 7 [\$700] fa the last one

WRIGHT: How much in wst else

HENDERSON: Sumbdy [somebody] just bought 10 [ten firearms] waiting on him now

WRIGHT: Price in the last message

WRIGHT: Its some big shit

WRIGHT: It's only one pic

WRIGHT: Wats price for these 3 [three firearms depicted in photograph above]

HENDERSON: Just told u 650 [\$650] and 700 [\$700]

HENDERSON: Big shit [rifles] gone was some ars [AR-15 style firearms]

WRIGHT: He want some big shit [rifles] to

HENDERSON: If this dude don't come get it I'll send the pic thru
but as of now sold

WRIGHT: Send pic throw a price

HENDERSON: ?what

HENDERSON: I have u the prices on the pic I sent

WRIGHT: For other pipe u selling buddy [For the other gun you
are selling]

HENDERSON: Ain't non else rn cause sumbdy finna come get 10 if
they don't get them I'll send the other pic

WRIGHT: You know my people need glocks

HENDERSON: Yea had 10 of them but they gone all that's left is
what I sent u

WRIGHT: Dam

HENDERSON: Let me knw wassup

WRIGHT: Ight

WRIGHT: Millennium 600 [Taurus Millennium for \$600?]

HENDERSON: 650 still gotta give u 20 lol

WRIGHT: Wats play for all_3 of them

HENDERSON: 1950

WRIGHT: 1900

HENDERSON: 1925 come on

WRIGHT: Tell yo brother bring u

HENDERSON: That's ugly rn lol

WRIGHT: Omg here we go

HENDERSON: It's SAFE FOR ALL OUT HERE U KNW THAT

WRIGHT: I kno but drivers ain't out here

HENDERSON: Yea but them ppl is I'll let u Knw if sumn change
[Yeah but law enforcement is, I'll let you know if
something changes]

33. Based on my training and experience, I believe HENDERSON was offering to sell three pistols for \$650 and \$700 each. WRIGHT was again acting as an intermediary for the sale and explaining to HENDERSON that the buyer wants some large firearms, specifically firearms that shoot rifle rounds. HENDERSON described having sold ten firearms to another buyer and not having anymore, "AR-15" style firearms, but would let WRIGHT know if the sale does not happen. HENDERSON also mentions having to pay WRIGHT for brokering the deal.

On or About January 15, 2017, WRIGHT and PHILLIPS Exchanged Facebook Messages Regarding Engaging in a Future Firearms Transaction

34. In another conversation captured from the WRIGHT Facebook Account search warrant, the following exchange occurred between WRIGHT and PHILLIPS, using PHILLIPS Facebook Account, on or about January 15, 2017:

WRIGHT: [Facebook call {incomplete}]

WRIGHT: Yoo

PHILLIPS: Wasup

WRIGHT: [Facebook call {incomplete}]

PHILLIPS: [Facebook call {114 seconds}]

WRIGHT: [Facebook call {incomplete}]

WRIGHT: I need merch [guns]

PHILLIPS: [Shared video {unknown} with WRIGHT]

PHILLIPS: [Facebook call {234 seconds}]

WRIGHT: 1500 without the drum [\$1500 for the firearm
without the high capacity drum magazine]

PHILLIPS: 18 [\$1800]

WRIGHT: 1600 [\$1600]

PHILLIPS: 18 [\$1800]

WRIGHT: [Facebook audio clip]

PHILLIPS: Ain't nun yet

WRIGHT: [Facebook audio clip]

PHILLIPS: Lol they deleted

WRIGHT: [Facebook audio clip]

PHILLIPS: Send the invite

PHILLIPS: [Facebook call {13 seconds}]

PHILLIPS: [Facebook call {29 seconds}]

35. Based on my training and experience, I believe that WRIGHT asked PHILLIPS about the status of the guns that PHILLIPS had for sale. PHILLIPS then shared an unknown video with WRIGHT. Based on the context of the conversation, law enforcement believes that PHILLIPS showed WRIGHT a video of a rifle with a

high-capacity “drum” magazine. WRIGHT attempted to negotiate the price of the firearm without the high capacity “drum” magazine. Ultimately, PHILLIPS provided a sale price for the firearm for \$1,800.

In January and August 2017, WRIGHT Engaged in Facebook Message Exchanges With HENDERSON To Purchase Firearms To Commit Acts of Violence

36. In summary, in January and August 2017, WRIGHT contacted HENDERSON through Facebook to purchase firearms for himself and other criminal gang members for protection and to commit acts of gang retaliation. According to law enforcement records, WRIGHT is a member of the Coco and Cornell Gang (“CCG”) ¹³ faction of the Conservative Vice Lords (“CVLs”) criminal street gang.

37. Specifically, on or about January 25, 2017, WRIGHT, using WRIGHT Facebook account, and HENDERSON, using HENDERSON Facebook Account, engaged in the following exchange:

WRIGHT:	Yoo
HENDERSON:	Wassup
WRIGHT:	Pics [photos of guns]
HENDERSON:	Ain’t non right now
HENDERSON:	We ain’t even look at the shit yet
WRIGHT:	Wya

¹³ According to law enforcement records, on or about August 2, 2012, Edward “Coco” Smith and Cornell Ferguson were murdered in a gang related shooting at 622 N. Avers Ave., Chicago, Illinois.

HENDERSON: Bowling

WRIGHT: When u gone be ready my Boi need Thaf shit to go
slide we just lost one are niggas

HENDERSON: Not in town yet bro still got stuff to get in the
morning

WRIGHT: So when u gone b ready then

HENDERSON: I told I tomorrow

38. On the same day, WRIGHT posted a public message on his Facebook page, which referenced the death of "Rondo Offdaave." WRIGHT also "tagged" a photograph of "Rondo Offdaave." A search of CPD records for homicide victims in January 2017 showed twenty year old Individual LL was shot and killed on or about January 23, 2017. Individual LL was a documented member of the CCG faction of the CVL street gang. Photographs of Individual LL match the photographs from the Facebook profile of "Rondo Offdaave."

39. On or about August 4, 2017, WRIGHT, using WRIGHT Facebook account, sent HENDERSON a Facebook message inquiring about HENDERSON's whereabouts. The following exchanged occurred:

HENDERSON: Wassup bro phone been messed up

WRIGHT: Man

HENDERSON: Wassup

WRIGHT: Wya

HENDERSON: Outta town still had take care some shit you straight

HENDERSON: U was lookin fa me

WRIGHT: We need them licks [we need guns]

HENDERSON: U don't they do lol

HENDERSON: U good ain't chu

HENDERSON: They just gotta to wait gotta take care some business
b4 I leave

WRIGHT: Mf got shot today

HENDERSON: Who??

WRIGHT: Mfs rob dice game

HENDERSON: Who and where at

HENDERSON: Our shit or c nem [our dice game or the CVLs]

WRIGHT: On CP one Are shorty pop one they ass [on Central
Park one of our young kid shot them]

HENDERSON: Dam they getting shit popping I see

40. A search of CPD records show that, on or about August 4, 2017, at approximately 4:20 p.m., CPD responded to a "shot spotter" call, which was updated to a "person shot" call at 945 N. Central Park Ave., Chicago, Illinois. Responding officers located the victim, Individual MM, with a gunshot wound to his/her upper right arm. Individual MM told the officers that he was walking past a group of unknown individuals who were rolling dice on the sidewalk. As Individual MM passed the unknown group, Individual MM felt a blunt object pressed against his back. Individual MM said an unknown subject searched through Individual MM's pockets

and removed \$300. Individual MM was then told to run by the unknown subject. While Individual MM ran, he heard a gunshot and felt pain on his arm. Individual MM could not provide a description of the offenders to the reporting officers.

41. Based on my training and experience, I believe that in the aforementioned Facebook messages between WRIGHT and HENDERSON, WRIGHT requested to purchase and/or to broker the purchase of firearms from HENDERSON that WRIGHT and his other gang members intended to use as protection and for acts of gang retaliation.

WRIGHT Brokered Firearms Transaction between PHILLIPS and Individual NN through Facebook in May and August 2017

42. During the course of searching WRIGHT's Facebook account, investigators located several conversations between WRIGHT and Individual NN, a gun buyer, regarding the sale of firearms. Individual NN is a documented member of the CCG faction of the CVLs street gang, concentrated on the Westside of Chicago. During the messages exchanged, Individual NN made reference to the CVL CCG when he ended his messages with "co" and "c." Throughout many of WRIGHTS' private and public Facebook posts, WRIGHT also made the same references regarding CVLs and the CCG.

43. Specifically, on or about May 29, 2017, the following exchange occurred between WRIGHT, using WRIGHT Facebook account, and Individual NN, using Individual NN Facebook account:

WRIGHT:



Photo Id: 1570329599675125

Individual NN: How much fo tha brown one c [price on brown gun]

WRIGHT: 650 or 700 gotta check

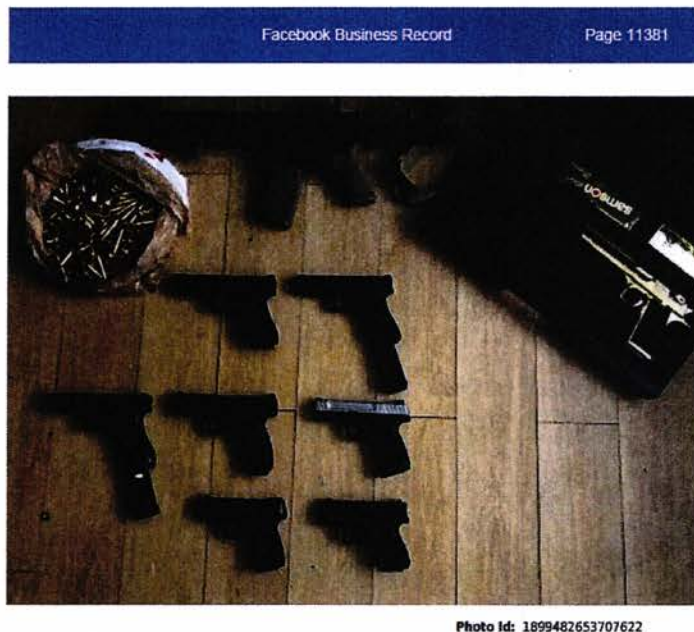
Individual NN: Igh bet I'm fin put sum together [ok I'm going to put something together]

WRIGHT: Ight [ok]

44. On or about August 10, 2017, WRIGHT communicated again with Individual NN via Facebook regarding the sale of firearms. The following exchange occurred between WRIGHT, using WRIGHT Facebook account, and Individual NN, using Individual NN Facebook Account:

WRIGHT: [Facebook call {72 seconds}]

WRIGHT:



WRIGHT: Choppa lick [AR rifle]

WRIGHT: In 3 more [three more firearms]

Individual NN: Naw I'm sayin I jus take the six shorty dat man
tryna charge 2bucks Fa dat choppa dat Mfka ain't
even a g n tha store on co [No, I'm just saying I'll just
take the 6 guns your source is trying to charge
\$2,000 for an AR rifle that retails for \$1,000 at the
store]

WRIGHT: [Audio clip-Unknown]

WRIGHT: U want the 6 then

Individual NN: Yea dats wit da Glizzy's right [Yeah, that's with the
Glock pistols, right?]

WRIGHT: Yeah I think

Individual NN: Wen n da am or tonight [When in the morning or tonight?]

WRIGHT: I think tonight

Individual NN: Ight let me kno

WRIGHT: Bet

45. Based on my training and experience, I believe that WRIGHT sent Individual NN a photograph of nine handguns, an AR rifle, and a bag filled with ammunition for the purpose of negotiating a firearms transaction. WRIGHT and Individual NN initially negotiated a gun deal for three handguns and one rifle. Individual NN re-negotiated the deal for six handguns due to the high price of the AR rifle.

46. In another conversation captured from the WRIGHT Facebook search warrant, the following exchange occurred between PHILLIPS, using the PHILLIPS Facebook Account, and WRIGHT, using the WRIGHT Facebook Account, on or about August 11, 2017:

WRIGHT:



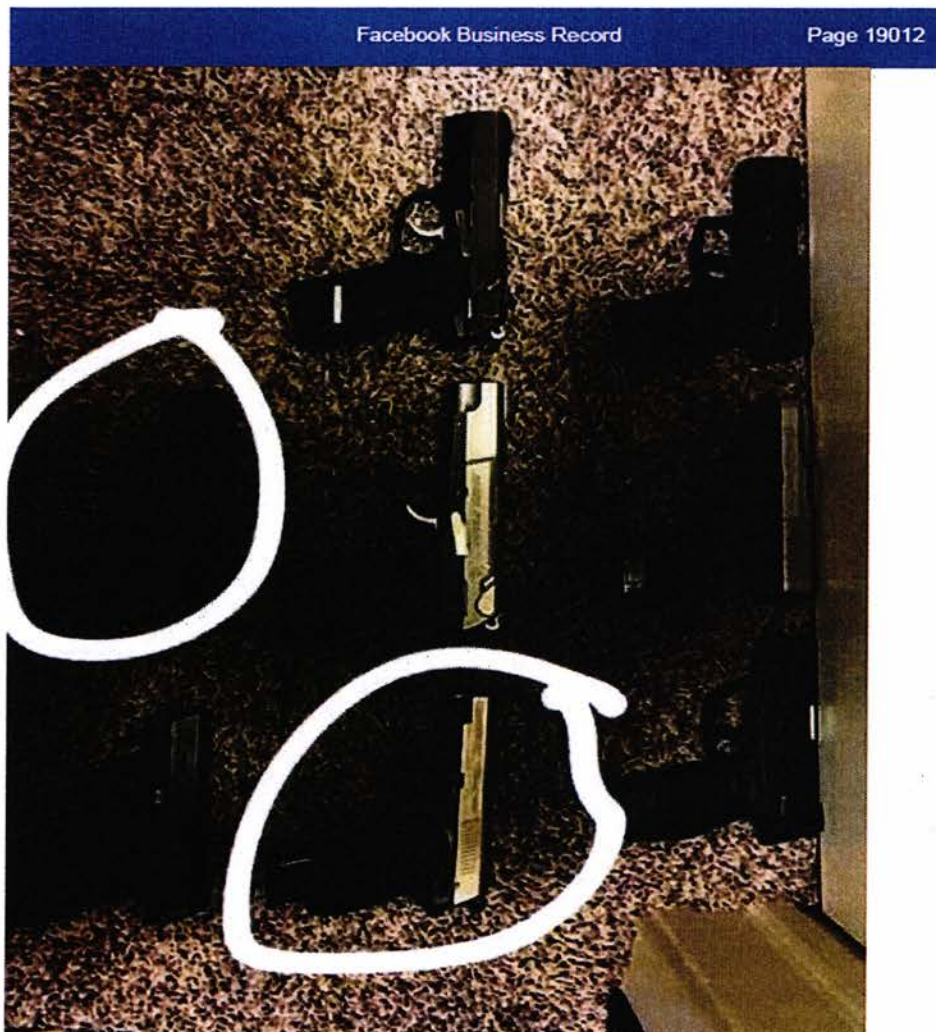
WRIGHT: U got it [referring to the firearm that is circled in red] ¹⁴

PHILLIPS: Yea 650 [\$650]

PHILLIPS: Clip hold 17 [gun magazine holds 17 bullets]

¹⁴ The photographs included in this Affidavit were obtained from the WRIGHT Facebook search warrant. The red and white markings that appear on the photographs were present on the images provided by Facebook from the WRIGHT account, and have not been altered by your affiant.

WRIGHT:



WRIGHT: How much for those [referring to the two firearms circled in white]

PHILLIPS: One on top gone

Based on my training and experience, I believe PHILLIPS was attempting to sell firearms to WRIGHT and was providing a price for the circled firearms and the

magazine capacity of the firearms. Additionally, PHILLIPS indicated that one of the firearms, circled in white, had already been sold.

PHILLIPS AND HENDERSON PURCHASE FIREARMS IN KENTUCKY

September 14, 2016 Purchase of Firearm by HENDERSON and PHILLIPS From Individual L in Kentucky

47. In summary, HENDERSON and PHILLIPS purchased a firearm from Individual L, a gun seller, in Kentucky on or about September 14, 2016, and that same firearm was recovered in Chicago on or about November 12, 2016.

48. More specifically, and according to CPD reports, on or about November 12, 2016, CPD recovered a Glock, 34, 9mm pistol, bearing serial number VHR891. The firearm was recovered during a narcotics investigation on the west side of Chicago. According to ATF records, the firearm was originally purchased by Individual L in Kentucky.

49. Law enforcement interviewed Individual L about the firearm. Individual L stated that he/she purchased the Glock, model 34, 9mm pistol with serial number VHR891, in September 2013. Individual L sold the firearm to an individual he/she met on Armslist. The buyer provided jphillips2714@gmail.com¹⁵ as a contact email to coordinate the sale of Individual L's firearm. The buyer was a black male and was accompanied by another male, but Individual L was unable to provide any further description of either individual.

¹⁵ According to Google records, jphillips2714@gmail.com is subscribed to "Mr. Nice Guy". However, records obtained from Xsport Fitness, an American gym chain, provide that PHILLIPS listed jphillips2714@gmail.com as his email address in two gym membership contracts from 2015 and 2016.

50. Individual L provided law enforcement with Armslist communications between Individual L's account and jphillips2714@gmail.com. Based on a review of the email communications, Individual L was able to determine that the firearm was sold to the buyer on September 14, 2016, sometime shortly after 5:13 p.m., in the area of 12981 Shelbyville Road, Louisville, Kentucky.

51. Law enforcement showed Individual L two photo arrays, which consisted of unmarked photographs of HENDERSON and PHILLIPS plus multiple subjects ("fillers") with similar physical characteristics as PHILLIPS and HENDERSON.¹⁶ After viewing the photo arrays, Individual L was unable to make a positive identification.

52. An examination of the historical cell site records for Henderson Phone 1 show that, on or about September 14, 2016, Henderson Phone 1 was utilizing a cell tower near the location of 12981 Shelbyville Road in Louisville, Kentucky, where the sale of Individual L's firearm occurred. Additionally, law enforcement received historical cell site records for a telephone number believed to be used by PHILLIPS, 708-XXX-9856 (hereinafter, "Phillips Phone 1").¹⁷ An examination of the records

¹⁶ Unless otherwise noted, all photo arrays mentioned throughout this Affidavit were conducted in an identical fashion.

¹⁷ Law enforcement identified Phillips Phone 1 as a telephone number used by PHILLIPS based on the following: According to subscriber information provided by the service provider, in or around November 2016, Phillips Phone 1 was subscribed to John Phillips at the Hillside Residence. As noted above in footnote 1, Phillips Vehicle 1, which PHILLIPS was observed driving, is registered under PHILLIPS' name and at the Hillside Residence. In addition, as discussed further below, during the course of this investigation, investigators learned that PHILLIPS provided Phillips Phone 1 on multiple occasions as a contact number for himself on Facebook.

shows that Phillips Phone 1 was utilizing a cell tower in the Louisville, Kentucky area during the time of the firearms transaction involving Individual L.

53. The time to crime for the recovery of the Glock, 34, 9mm pistol, bearing serial number VHR891 was approximately 60 days. Typically, the time to crime refers to the period of time between the original purchase of a firearm and the recovery of that firearm by law enforcement at a crime scene. However, as discussed above, throughout this Affidavit, the time to crime refers to the time period between when HENDERSON and PHILLIPS purchased the firearms from various Kentucky residents to when the firearms were recovered at various crimes scenes in Chicago.

December 23, 2016 Purchase of Firearm by HENDERSON and PHILLIPS from Individual W in Kentucky

54. In summary, HENDERSON purchased a firearm from Individual W, a gun seller, in Kentucky on or about December 23, 2016, and that same firearm was recovered in a Chicago suburb on or about April 7, 2017.

55. More specifically, on or about April 7, 2017, Westchester police recovered a Glock, 30S, .45-caliber pistol, bearing serial number XDP049, in Riverside, Illinois, while investigating a vehicular hijacking. Westchester police arrested an individual and charged the individual with aggravated vehicular hijacking.

56. ATF records show the Glock, 30S, .45 caliber pistol, with serial number XDP049, was originally purchased in November 2014 in West Point, Kentucky by Individual W.

57. Law enforcement interviewed Individual W regarding the Glock, 30S, .45 caliber pistol with serial number XDP049. During the interview, Individual W stated that he/she purchased the gun from Knob Creek Range in West Point, Kentucky. Individual W stated that he/she sold the firearm to an individual he/she met on Armslist. Individual W provided the buyer's email address he/she used to communicate through Armslist, which was "chawty23.ch@gmail.com."¹⁸ The sale took place around noon and near the area of 6801 Dixie Highway, Louisville, Kentucky. Individual W provided law enforcement with a copy of a receipt for the firearm sale. The receipt was signed by the purchaser and indicated the purchaser was "Christopher Henderson." The receipt also indicated that the sale took place on December 23, 2016.

58. Individual W described the buyer as a black male with a stocky build and dreadlocks, a physical description that is consistent with HENDERSON. Individual W was shown a photo array of HENDERSON, but was unable to make an identification.

59. Law enforcement later obtained a search warrant for chawty23.ch@gmail.com. Based on a review of records obtained from the search warrant, law enforcement located email communications between chawty23.ch@gmail.com and the email belonging to Individual W. These

¹⁸ According to Google records, chawty23.ch@gmail.com is subscribed to "Chris Henderson" and lists Henderson Phone 1 as a contact number.

communications detail the sale of a Glock model 30S that took place, on or about December 23, 2016, sometime after 3:31 p.m.

60. An examination of the historical cell site records for Henderson Phone 1 show that, on or about December 23, 2016, between approximately 4:34 p.m. and 4:36 p.m., Henderson Phone 1 was utilizing a cell tower near the location of 6801 Dixie Highway, Louisville, Kentucky. Phone records further show that, on or about December 23, 2016, at approximately 2:53 p.m. and 3:36 p.m., there were two contacts between Henderson Pinger 6682 and 502-XXX-3505, which is a telephone number for Individual W's place of employment. Historical cell site records for a telephone number believed to be used by PHILLIPS, 312-XXX-0618 (hereinafter, "Phillips Phone 2")¹⁹ show that the phone was utilizing a cell tower in the Louisville, Kentucky area, on or about December 23, 2016, between 8:32 a.m. and 8:37 p.m.

61. The time to crime for the recovery of the Glock, 30S, .45-caliber pistol, bearing serial number XDP049 was approximately 106 days.

¹⁹ Law enforcement identified PHILLIPS as the user of Phillips Phone 2 based on the following: According to subscriber information provided by the service provider, Phillips Phone 2 was subscribed to John L. Phillips at 610 N. Wolf Road, Hillside, Illinois. Records show that Phillips Phone 2 was subscribed to PHILLIPS between November 25, 2016 and May 9, 2017. As noted above, Phillips Vehicle 1 was registered to PHILLIPS at the same Hillside residence.

January and February 2017, HENDERSON and PHILLIPS Obtained Three Firearms From Kentucky Residents

62. In or around January and February 2017, HENDERSON and PHILLIPS obtained three firearms from Kentucky residents, and two of the firearms were later recovered in Chicago on or about March 28, 2017.

63. On or about March 28, 2017, CPD officers executed a search warrant for cannabis at a residence located on the 3700 block of West Polk Street, Chicago, Illinois. CPD recovered, among other items, two firearms: a Diamondback Arms Inc., model DB-15, .223 caliber pistol, bearing serial number DB1818209 and an Anderson model AM-15, 5.56 caliber pistol, bearing serial number 16112293. CPD arrested an individual at the residence, a convicted felon, and he was charged with possession of cannabis.

64. According to ATF records, the firearms recovered from the West Polk Street residence were originally purchased in Kentucky. Specifically, the first firearm, Diamondback Arms Inc., model DB-15, .223 caliber pistol, bearing serial number DB1818209 (the "Diamondback pistol"), was purchased by Individual A, a straw purchaser. The second firearm, Anderson model AM-15, 5.56 caliber pistol, bearing serial number 16112293 (the "Anderson pistol"), was purchased by Individual B, a gun seller. Both Individual A and Individual B are Kentucky residents. During the course of this investigation, law enforcement interviewed Individual A and Individual B.

Individual A Straw Purchased a Firearm for PHILLIPS

65. During the interview with law enforcement, Individual A provided the following information:

a. In or around November 2016, Individual A's friends – Individual C and Individual T – introduced him/her to an individual named "John." Specifically, Individual T introduced "John" as his/her brother. Law enforcement showed Individual A a photo array that contained a photo of PHILLIPS. Individual A identified PHILLIPS as the person she knew as "John." Individual A explained that a couple of months after meeting PHILLIPS, Individual C told him/her that PHILLIPS needed assistance with purchasing a gun. Individual A was aware that Individual C had previously purchased a gun for PHILLIPS.

b. Individual A agreed to purchase a gun for PHILLIPS.²⁰ Individual A stated that, in exchange for purchasing the gun, Individual A believed that he/she would be paid \$500. Individual A further explained that he/she went to a store called Gunz, Inc. in Kentucky to purchase the gun for PHILLIPS. Individual A recalled that, prior to going to the gun store, he/she spoke with PHILLIPS over the phone. Individual A stated that PHILLIPS instructed him/her to go inside the gun store and ask to purchase a "Draco" pistol. Once inside the store, Individual A stated that a store clerk informed him/her that the gun store did not carry "Draco" pistols.

²⁰ When law enforcement initially approached Individual A about the Diamondback pistol, Individual A lied to law enforcement and stated that the gun had been stolen from the trunk of his/her car. Individual A later admitted that statement was untruthful and, in fact, he/she purchased the gun for PHILLIPS.

Individual A sent a text message to PHILLIPS to inform PHILLIPS that the store did not carry Draco pistols. Individual A recalled that PHILLIPS then sent text messages to Individual A's phone containing photographs of other types of guns. Individual A stated that he/she then purchased the Diamondback pistol for PHILLIPS, because it resembled a type of gun depicted in the photos PHILLIPS sent. Individual A maintained he/she had no recollection of purchasing a second gun for PHILLIPS that day.²¹ Individual A stated that he/she underwent a background check, and was told he/she would be contacted to pick up the gun once the background check cleared.

c. Individual A stated that, in or around February 2017, the gun store notified him/her to pick up the Diamondback pistol. Individual A recalled that PHILLIPS picked him/her up from home and drove to the gun store. Individual A stated that PHILLIPS was driving a white Dodge Charger with tinted windows. Individual A viewed photographs depicting PHILLIPS' white Dodge Challenger. After viewing the photos, Individual A identified the vehicle as resembling the vehicle PHILLIPS used to drive them to the gun store.

d. Individual A stated that when they arrived at the gun store, Individual A went inside and picked up the Diamondback pistol. Individual A returned to the vehicle with PHILLIPS, and he drove Individual A home. Individual A recalled that as they drove to his/her apartment, he/she observed a telephone

²¹ According to records obtained from Gunz. Inc., on February 1, 2017, Individual A purchased the Diamondback pistol as well as a Zastava, 5.56 pistol with serial number M85-NP005128.

number, with an area code Individual A believed was associated with Chicago, appear on the monitor affixed to PHILLIP's vehicle dashboard. Individual A further recalled that PHILLIPS answered the phone call and informed the caller that he would be heading "back," which Individual A understood to mean back to Chicago.

e. Individual A stated that, once they arrived at his/her apartment, Individual A told PHILLIPS he/she was going inside to retrieve the paperwork for the gun. Individual A left the Diamondback pistol inside the car. Individual A recalled that when he/she returned from his/her apartment, PHILLIPS was gone.

f. Individual A explained that he/she tried to call PHILLIPS and reach out to him through his SnapChat account, but PHILLIPS blocked Individual A from his Snapchat and blocked Individual A's phone calls. Individual A stated that she never received the \$500 she was promised in exchange for purchasing the gun.

g. Individual A recalled that, on one occasion, Individual T also introduced Individual A to his/her cousin "Chris." Law enforcement showed Individual A a photo array that contained a photograph of HENDERSON. Individual A identified HENDERSON as the person he/she knew as "Chris." Individual A stated that Individual T told him/her that PHILLIPS and HENDERSON were from Chicago.

66. According to Individual A's toll records, between January 11, 2017 and February 1, 2017, there were approximately 33 incoming and outgoing calls between Individual A's phone and Phillips Phone 2. Individual A's toll records further show that, on or about February 1, 2017 (the day the firearms were picked up from the gun

store), between approximately 8:41 a.m. and 12:24 p.m., there were approximately nineteen incoming and outgoing calls between Individual A and Phillips Phone 2.

67. The time to crime for the recovery of the Diamondback pistol was approximately 55 days.

Individual B Sold a Firearm to HENDERSON

68. As explained above, on March 28, 2017, law enforcement executed a search warrant on the 3700 block of West Polk Street and recovered an Anderson pistol, bearing serial number 16112293. According to ATF records, this Anderson pistol was purchased by Individual B, a gun seller, on May 12, 2016. Individual B was interviewed by law enforcement regarding his/her sale of the Anderson pistol. During the interview, Individual B reported the following:

a. He/she previously purchased the Anderson pistol from the Kentucky Gun Company in Bardstown, Kentucky. Individual B told agents that he/she later sold the firearm in February 2017 to an individual he/she met on the Armslist website. Specifically, Individual B stated that he/she sold the Anderson pistol on or about February 16, 2017, in exchange for \$650. Upon being shown a photo array that contained a photograph of HENDERSON, Individual B identified HENDERSON as the individual who purchased the Anderson pistol from him/her.

b. Individual B further stated that, at the time of the sale, HENDERSON was in the company of an unknown female and arrived to meet Individual B in a white vehicle that Individual B believed was a Dodge Challenger. Individual B provided law enforcement with a copy of email communication between

himself/herself and HENDERSON, who was using the email address reachme2morrow@gmail.com,²² in which HENDERSON informed Individual B that he would be in a “white Challenger.”

69. The time to crime for the recovery of the Anderson pistol was approximately 41 days.

Individual C Straw Purchased Two Firearms for PHILLIPS

70. During the course of this investigation, law enforcement also interviewed Individual C, a straw purchaser. As explained above, Individual A identified Individual C as someone who purchased firearms for PHILLIPS. Law enforcement thereafter interviewed Individual C. Individual C reported the following information to law enforcement:

a. In February 2017, he/she purchased two firearms from Gunz, Inc., which is a gun store located in Louisville, Kentucky. Individual C provided law enforcement with receipts for the purchase of a Zastava model PAP M92 PV, .762 caliber pistol, bearing serial number M92PV063135 (the “Zastava Pistol 1”) and a Zastava model PAP M92 PV, .762 caliber pistol, bearing serial number M92PV065663 (the “Zastava Pistol 2”).²³

²² According to Google records, reachme2morrow@gmail.com is subscribed to “The Chosen One.” An examination of emails recovered from a search warrant confirmed Individual K’s communication with reachme2morrow@gmail.com. However, an email, dated August 25, 2017 was sent from this email to “O’Hare towing.” The email contained a copy of the insurance card for Phillips Vehicle 1. This email came one day after PHILLIPS was arrested by the Illinois State Police, who towed Phillips Vehicle 1 incident to the arrest.

²³ According to records obtained from Gunz, Inc., Individual C purchased the Zastava pistols on January 17, 2017.

b. Individual C stated that he/she purchased the firearms at the direction of a male he/she knew as "JoJo." Law enforcement showed Individual C a known photograph of PHILLIPS and he/she identified the person in the photograph as the person he/she knew as "JoJo." Specifically, Individual C stated that PHILLIPS provided him/her with \$1,270 and told Individual C to purchase "big guns." PHILLIPS drove Individual C to the gun store and waited for Individual C outside the gun store. Law enforcement showed Individual C a stock photograph of a white Dodge Challenger and Individual C stated that it looked similar to the vehicle that PHILLIPS was driving when they drove to the gun store.

c. Individual C stated that, after he/she purchased the firearms, Individual C gave PHILLIPS the firearms and PHILLIPS paid Individual C \$200. Individual C never saw the firearms again.

d. Individual C further stated that he/she believed that PHILLIPS was from the west side of Chicago and that PHILLIPS was related to an individual named "Chris." Individual C was subsequently shown a known photograph of HENDERSON. Individual C identified the individual in the photograph as the person he/she knows as "Chris."²⁴ Individual C stated that he/she, PHILLIPS, HENDERSON, and Individual A are all acquaintances.

²⁴ During a later interview, law enforcement showed Individual C separate photo arrays that contained a photo of PHILLIPS and HENDERSON, respectively. Individual C identified PHILLIPS in the photo array as the person he/she knew as "JoJo." Individual C identified HENDERSON in the photo array as the person he/she knew as "Chris."

71. According to Individual C's toll records, between December 22, 2016 and February 21, 2017, there were approximately 30 incoming and outgoing calls between Individual C's phone and Phillips Phone 2. Individual C's toll records further show that, on or about January 17, 2017 (the day the firearms were purchased), between approximately 10:15 a.m. and 12:43 p.m., there were approximately two phone calls between Individual C and Phillips Phone 2.

February 16, 2017 Purchase of Firearm by HENDERSON and PHILLIPS from Individual D in Kentucky

72. In summary, HENDERSON and PHILLIPS purchased a firearm from Individual D, a gun seller, on or about February 16, 2017, and that same firearm was recovered in Chicago on or about May 17, 2017.

73. More specifically, on or about May 17, 2017, CPD recovered a Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJU94622. Specifically, an anonymous caller reported a person with a gun in a vehicle. CPD responded to the call, stopped the vehicle in the area of 951 N. Kedzie, on the west side of Chicago and recovered a gun from the individual's vehicle.

74. The firearm that CPD recovered from the vehicle on North Kedzie was originally purchased by Individual D in Kentucky. Law enforcement interviewed Individual D, who provided the following information:

a. Individual D stated that he/she purchased a Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJU94622, in November 2016. Individual D sold the firearm to an individual he/she met on Armslist in exchange for \$240. Law enforcement showed Individual D a photo array that contained a

photograph of HENDERSON, and Individual D identified HENDERSON as the person who purchased his/her Taurus firearm. Specifically, HENDERSON purchased the firearm from Individual D on February 16, 2017.

b. Individual D stated that he/she believed that HENDERSON arrived to the firearm deal in a white Dodge Challenger. Law enforcement showed Individual D a photograph of Phillips Vehicle 1 and he/she identified it as the vehicle HENDERSON drove to the deal. Individual D further stated that HENDERSON arrived in the company of a male whom Individual D did not view long enough to identify.

c. Individual D provided law enforcement with a handwritten receipt signed by Individual D and HENDERSON, which documented the sale of the firearm. Individual D stated that the sale took place near the St. Matthews Mall located in Louisville, Kentucky.

75. Historical cell site records for Henderson Phone 1 shows that the phone was utilizing a cell tower near the St. Matthews Mall in Louisville on or about February 16, 2017 at approximately at 7:45 a.m. and 7:46 a.m. Records further show that a telephone number believed to be used by PHILLIPS, 708-XXX-2790 (hereinafter, "Phillips Phone 3")²⁵ was utilizing a cell tower in the same area at approximately 7:27 a.m. and 7:28 a.m.

²⁵ Law enforcement identified PHILLIPS as the user of Phillips Phone 3 based on the following: According to subscriber information provided by the service provider, PHILLIPS Phone 3 was subscribed to "John Phillips" at the Hillside Residence between February 15, 2017 and November 19, 2017.

76. The time to crime for the recovery of the Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJU94622 was approximately 90 days.

March 17, 2017 Purchase of Firearm by HENDERSON and PHILLIPS from Individual I in Kentucky

77. In summary, on or about March 17, 2017, HENDERSON and PHILLIPS purchased a firearm from Individual I, a gun seller, and that same firearm was recovered in Chicago on or about May 6, 2017.

78. Specifically, on or about May 6, 2017, CPD recovered a Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJP71429, during a narcotics investigation in Chicago. CPD officers approached the vehicle and seized the firearm.

79. According to ATF records, the original purchaser of this firearm was Individual I, a Kentucky resident. Law enforcement interviewed Individual I, who provided the following information:

a. Individual I stated that he/she sold a Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJP71429, to an individual that he/she met on Armslist in exchange for \$300. Law enforcement showed Individual I a photo array that contained a photograph of HENDERSON, and Individual I identified HENDERSON as the person who purchased the firearm.

b. Individual I further stated that he/she had a written receipt for this sale dated March 16, 2017. According to the receipt, HENDERSON provided the name "Christian Banks" to Individual I. Based on my training and experience, I

believe that HENDERSON used an alias name of "Christian Banks" to disguise his true identity.

c. Although Individual I could not recall the make or model of the vehicle that HENDERSON used for the deal, Individual I described it as a white, late model American "muscle car."

d. Individual I stated the sale took place near 1155 Buck Creek Road, Simpsonville, Kentucky.

80. According to the phone records of Individual I, there were two phone calls, on or about March 16, 2017, between Individual I and Henderson Pinger 6682. Historical cell site records also show that Henderson Phone 1 utilized a tower near the location of the sale, on or about March 16, 2017, at approximately 11:58 a.m., 11:59 a.m., and 12:00 p.m. Additionally, historical cell site records for Phillips Phone 3 show the phone utilized a cell tower near the location of the sale, on or about March 16, 2017, at approximately, 11:53 a.m. and 11:55 a.m.

81. The time to crime for the recovery of the Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJP71429, was approximately 51 days.

May 21, 2017 Purchase of Firearm by HENDERSON and PHILLIPS from Individual K in Kentucky

82. In summary, HENDERSON and PHILLIPS purchased a firearm from Individual K, a gun seller, in Kentucky on or about May 21, 2017, and that same firearm was recovered in Chicago on or about June 22, 2017.

83. On or about June 22, 2017, CPD recovered a Walther, Creed, 9mm pistol, bearing serial number FCH9601. The firearm was recovered from a stolen vehicle after police initiated a traffic stop on the vehicle near the 2600 block of west Thomas in Chicago.

84. According to ATF records, the original purchaser of this firearm was Individual K, a Kentucky resident. Law enforcement interviewed Individual K, who provided the following information:

a. Individual K stated that, on or about May 21, 2017, he/she sold the Walther, Creed, 9 millimeter pistol, bearing serial number FCH9601 and a second firearm, a M&P Shield, 9 millimeter pistol, to an individual that he/she met on the Armslist website.

b. Before the deal, Individual K communicated with the user of the email address therichgates@gmail.com.²⁶ Specifically, on or about May 19, 2017, Individual K received an email from therichgates@gmail.com. The user of therichgates@gmail.com was responding to an advertisement that Individual K posted on Armslist regarding the sale of his "M and P Shield 9mm." According to the email correspondence that Individual K provided to law enforcement, the user of

²⁶ According to Google records, therichgates@gmail.com is subscribed to "Kobe Bryant." However, law enforcement believes HENDERSON was the user of therichgates@gmail.com email address, because as noted below, HENDERSON provided Individual K with Henderson Pinger 6682 as his contact number. Additionally, historical cell site records place HENDERSON PHONE 1 in the area near the occurrence of the firearms sale involving Individual K from May 21, 2017.

therichgates@gmail.com stated, "I'll buy both," referring to the M&P pistol and the Walther, Creed pistol.

c. Individual K stated that he/she met the purchaser at a Walmart store parking lot located in Frankfort, Kentucky, and sold both firearms for \$650. Individual K described the purchaser of the firearms as a black male with dread locks and a stocky build. Law enforcement showed Individual K a photo array that contained a photograph of HENDERSON. After viewing the photo array, Individual K stated that he/she was ninety-five percent certain that HENDERSON was the individual who purchased the firearms. Individual K further stated that, prior to the deal, he/she also communicated with the purchaser over the telephone.

85. According to toll records for Henderson Pinger 6682, there were five phone calls between Individual K and Henderson Pinger 6682 on May 21, 2017. Individual K provided Henderson Pinger 6682 as the telephone number the purchaser gave Individual K. Historical cell site records show that Henderson Phone 1 utilized a cell tower near the location of the firearm sale, on or about May 21, 2017, at approximately 7:10 p.m. Furthermore, historical cell site records show that Phillips Phone 3 was also utilizing a cell tower in the area of the sale, on or about May 21, 2017, at approximately 7:25 p.m.

86. The time to crime for the recovery of the Walther, Creed, 9mm pistol, bearing serial number FCH9601, was approximately 31 days.

May 28, 2017 Purchase of Firearm by HENDERSON from Individual E in Kentucky

87. In summary, on or about May 28, 2017, HENDERSON purchased a firearm from Individual E, a gun seller, in Kentucky, and the firearm was later recovered in Chicago on or about June 10, 2017.

88. Specifically, on or about June 10, 2017, CPD received an anonymous tip about a gun in a gangway on the west side of Chicago. CPD officers responded to the scene and recovered a Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJX31916. According to ATF records, Individual E, a Kentucky resident, originally purchased the firearm in Kentucky.

89. Law enforcement interviewed Individual E, who provided the following information:

a. Individual E stated that, on or about May 28, 2017, he/she sold a Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJX31916 to an individual named "Chris Hendridge" for \$220.

b. Individual E provided the following contact number for "Chris Hendridge": 502-XXX-6682, that is, Henderson Pinger 6682.

c. Law enforcement showed Individual E a photo array of HENDERSON. After viewing the photo array, Individual E was not able to make a positive identification. Individual E stated that his identification rested between two photographs; one was of HENDERSON and the other was a photograph of a filler.

d. Individual E provided law enforcement with a copy of the written receipt from the deal. According to the receipt, "Chris Hendridge" provided a

Kentucky driver's license to Individual E with driver's license number "H13-370-573." A search of Kentucky driver's license database revealed no records for that driver's license number.

e. Individual E stated that "Chris Hendridge" drove a white Dodge Challenger. Upon being shown a photograph of Phillips Vehicle 1, Individual E identified it as the vehicle "Chris Hendridge" drove. Individual E further stated that he/she had previously sold "Chris Hendridge" a Sig Sauer SP2022 pistol bearing serial number 24B247402, on or about May 21, 2017.

f. Individual E stated the May 21, 2017 sale took place in the area of 7101 Cedar Springs Boulevard, Louisville, Kentucky, and the May 28, 2017 sale took place in the area of 12611 Taylorsville Road Louisville, Kentucky.

g. Based on my training and experience, I believe that HENDERSON provided a false driver's license number and an alias name of "Chris Hendridge" to disguise his true identity.

90. Historical cell site records for Henderson Phone 1 shows that the phone utilized a cell tower near the location of the sale of the Taurus firearm, on or about May 21, 2017, at approximately 12:39 p.m. and 12:41 p.m. Records for Phillips Phone 3 also show the phone in Kentucky at the time of the sale. Additionally, historical cell site records for Henderson Phone 1 shows the phone utilized a cell tower near the location of the sale of the Sig Sauer pistol, on or about May 28, 2017, at approximately 10:16 a.m. Records for Phillips Phone 3 show the phone in Kentucky at the time of the sale.

91. The time to crime for the recovery of the Taurus model PT111 Millennium G2, 9mm pistol, bearing serial number TJX31916 was approximately 14 days.

May 27, 2017 Purchase of Firearm by HENDERSON from Individual GG in Kentucky

92. On or about May 27, 2017, HENDERSON purchased a firearm from Individual GG, a gun seller, in Kentucky, and that same firearm was later recovered in Chicago on or about August 20, 2017.

93. On August 20, 2017, CPD recovered a Taurus, PT111 Millennium G2, 9mm pistol with serial number TJZ89203. The firearm was recovered after an individual pointed the firearm at someone on the street during a verbal argument. The offender was arrested and the firearm was taken into CPD custody and inventoried. ATF records indicate the Taurus, PT111 Millennium G2, 9mm pistol with serial number TJZ89203, was purchased in Kentucky by Individual GG.

94. Law enforcement interviewed Individual GG, who provided the following information:

a. Individual GG stated that he/she purchased a Taurus, PT111 Millennium G2, 9mm pistol with serial number TJZ89203, in Kentucky, but later sold it to an individual he/she met on Armslist for \$250.

b. Individual GG met the buyer sometime in the mid-afternoon, near 5001 Mud Lane in Louisville, Kentucky. Individual GG stated that the buyer arrived at the deal in a white Dodge Charger or Challenger, and the buyer was a passenger in the vehicle.

c. Individual GG provided law enforcement with a copy of the receipt for the sale of the firearm. According to the receipt, the sale date was May 27, 2017. Individual GG stated the buyer filled out the receipt and provided the name of "Christian Hendridge." Additionally, there is a witness section on the receipt. According to Individual GG, "Christian Hendridge" walked over to the vehicle he arrived in and had the driver of the vehicle sign that section. According to the receipt, the driver signed his name as "Jason Phillips." Law enforcement showed Individual GG a photo array that contained a photograph of HENDERSON, however, Individual GG state that he/she was uncertain and that his/her decision rested between two photos. One photo was of HENDERSON and the other was of a filler photo. Individual GG stated that he/she did not get a good look at the driver and was unable to provide any identifiers for the driver. Individual GG was also shown a picture of Phillips Vehicle 1 and Individual GG indicated the pictured vehicle was similar to the vehicle the buyer used for the deal.

d. Individual GG provided law enforcement with a telephone number that he/she used to communicate with the buyer, 502-XXX-4898 (hereinafter,

“Henderson/Phillips Pinger 4898”).²⁷ Individual GG also identified reachme2morrow@gmail.com as a contact email that he/she had for the buyer.²⁸

95. Records for Henderson Phone 1 show the phone utilized a cell tower near the location of the firearm sale with Individual GG, on or about May 27, 2017, at approximately 12:22 p.m. and 12:30 p.m. Similarly, records for Phillips Phone 3 show that phone utilized a cell tower near the firearm sale, on or about May 27, 2017, at approximately 11:49 a.m. and 12:11 p.m.

96. The time to crime for the Taurus, PT111 Millennium G2, 9mm pistol with serial number TJZ89203, was approximately 86 days.

FIREARMS RECOVERED DURING TRAFFIC STOPS OF HENDERSON AND
PHILLIPS

97. During the course of the investigation, between October 2016 and August 2017, law enforcement conducted traffic stops of HENDERSON and PHILLIPS, and recovered firearms from inside their vehicles. ATF records show that the firearms were originally purchased in Kentucky.

²⁷ Law enforcement believes that HENDERSON and/or PHILLIPS is the user of Henderson/Phillips Pinger 4898 based on the following: According to records obtained from Pinger, the telephone number associated with Henderson/Phillips Pinger 4898 was created using the telephone number for Phillips Phone 1. Specifically, on or about September 13, 2016, Phillips Phone 1 was used to register Henderson/Phillips Pinger 4898 with Pinger.

²⁸ As set forth in paragraph 62 and footnote 22, this email address was used to communicate with Individual B regarding purchasing a firearm. Individual B identified HENDERSON as the person who purchased the firearm.

Law Enforcement Recovered A Firearm From Hidden Compartment Inside HENDERSON's Vehicle On October 11, 2016

98. On or about October 11, 2016, officers from the Cicero Police Department conducted a traffic stop of HENDERSON's vehicle after observing traffic violations in Cicero, Illinois. A check of HENDERSON'S Illinois driver's license revealed HENDERSON had a suspended license. During an inventory search of HENDERSON'S vehicle, a 2008 Silver Mercedes C-Class sedan, bearing Illinois registration "Q336093 (hereinafter, "Henderson Vehicle 1"),²⁹ law enforcement discovered a Glock, 23, .40 caliber pistol, bearing serial number ZBH639, hidden in a compartment located in the passenger floor area of the vehicle. Additionally, law enforcement recovered assorted rounds of ammunition, assorted magazines, and \$1,439 in cash. HENDERSON was charged with the state offense of aggravated unlawful use of a weapon, and that case is currently pending.

99. Following his arrest, HENDERSON provided a signed waiver of his *Miranda* rights and gave a written statement detailing his possession of the firearm and explaining how he purchased the firearm in Kentucky. During the interview, HENDERSON stated:

a. He purchased the Glock pistol for \$700 at a gun show in Lexington, Kentucky a few months prior to his arrest;

²⁹ According to Illinois Secretary of State Records, Henderson Vehicle 1 was registered to Christopher Jamel Henderson at a residence on the 900 block of N. Central Park Avenue, Chicago, Illinois at the time of this arrest. HENDERSON's driver's license records list his last known address at the same address.

b. He kept the Glock pistol for personal protection and stored the firearm under the front passenger floor mat of his vehicle (Henderson Vehicle 1); and

c. The additional ammunition and assorted magazines recovered from the vehicle belonged to him.

100. ATF records indicate the Glock 23, .40 caliber pistol, with serial number ZBH639, was originally purchased in 2015 in Louisville, Kentucky by Individual V. Individual V is a Kentucky resident. According to Individual V, he/she sold the firearm to a gun store. Law enforcement obtained records from the gun store and learned that they sold the gun to Individual VV. Law enforcement interviewed Individual VV, a gun seller, who reported that he/she sold the gun to an unknown individual without a bill of sale.

Law Enforcement Recovered Firearm from PHILLIPS' Vehicle On July 9, 2017

101. In summary, on or about July 9, 2017, CPD officers conducted a traffic stop of Phillips Vehicle 1 and recovered a firearm whose parts contained two serial numbers. HENDERSON was identified by Kentucky residents as the individual who purchased firearms bearing the same serial numbers as the firearm recovered from inside Phillips Vehicle 1.

102. Specifically, on or about July 9, 2017, CPD officers were responding to a call of shots fired in the area of 60443 S. Throop when officers observed Phillips Vehicle 1 commit several traffic violations. Officers initiated a traffic stop of Phillips Vehicle 1. Officers ran a name check of PHILLIPS and the other occupant in the vehicle, Individual PP, and learned that Individual PP had an outstanding warrant.

Individual PP was placed under arrest. During a custodial search of Individual PP's person, officers recovered a grey metal magazine with three .32 caliber rounds inside his left pocket. PHILLIPS was then asked to exit the vehicle. During a search of the vehicle, officers recovered a plastic bag containing .40 caliber and 9mm rounds of ammunition from inside the center console. PHILLIPS was then placed under arrest. Officers also recovered two firearms from Phillips Vehicle 1. The firearms were located inside of the glovebox, which was locked. One of the recovered firearms was a Glock pistol with two separate serial numbers. The frame of the Glock had the serial number ABXP891 and the slide/barrel of the Glock had the serial number BBFY989. Based on my training and experience, and my knowledge of this investigation and others, it appears that the firearm was modified to incorporate parts from two separate guns. PHILLIPS was charged with the state offense of being a felon in possession of a firearm, and that case is currently pending.

103. The serial number on the frame returned to a Glock model 19, 9mm pistol, bearing serial number ABXP891. The serial number on the slide/barrel returned to a Glock model 23, .40 caliber pistol, bearing serial number BBFY989. Both serial numbers were traced to separate gun sellers located in Kentucky: Individual F and Individual G. In addition, according to an ATF interstate nexus expert, both firearms were manufactured outside of the State of Illinois.

104. First, Individual F was identified as the original purchaser of the Glock model 19, 9mm pistol, bearing serial number ABXP891. Law enforcement interviewed Individual F, who provided the following information:

a. Individual F stated the sale occurred in Louisville, Kentucky, at 11801 Interchange Drive, sometime between 3:00 p.m. and 4:30 p.m. on July 6, 2017.

b. Individual F stated that, on or about July 6, 2017, Individual F sold the Glock model 19, 9mm pistol, bearing serial number ABXP891, to an individual he/she met on Armslist. Individual F viewed a photo array that contained a photograph of HENDERSON and identified HENDERSON as the person who purchased the firearm.

c. Individual F stated that HENDERSON arrived to the sale in a white Dodge Challenger and paid \$450 in cash for the Glock. After being shown a photograph of Phillips Vehicle 1, Individual F stated it appeared to be the same vehicle HENDERSON was driving.

d. According to Individual F, during the meeting, HENDERSON asked Individual F if he/she had any additional guns for sale. Individual F told HENDERSON he/she had more expensive firearms for sale, but HENDERSON did not purchase additional firearms from Individual F.

105. Records for Henderson Phone 1 show that phone utilized a cell tower near the location of the sale with Individual F, on or about July 6, 2017, at approximately 4:23 p.m. and 4:29 p.m. Similarly, records for Phillips Phone 3 show that phone utilized a cell tower near the location of the sale, on or about July 6, 2017, at 4:26 p.m. and 4:36 p.m.

106. The time to crime for the Glock model 19, 9mm pistol, bearing serial number ABXP891, was approximately 3 days.

107. Second, Individual G was identified as the original purchaser of a Glock model 23, .40 caliber pistol, bearing serial number BBFY989. Law enforcement interviewed Individual G, who provided the following information:

a. Individual G stated that, on or about May 6, 2017, he/she sold a Glock model 23, .40 caliber pistol, bearing serial number BBFY989, to an individual he/she met on Armslist, and the sale took place near Midway, Kentucky. Individual G viewed a photo array that contained a photograph of HENDERSON and identified HENDERSON as the person who purchased the firearm. HENDERSON paid \$500 in cash for the firearm.

b. Individual G stated that HENDERSON arrived to the sale in a white Dodge Challenger. Individual G provided law enforcement with a copy of text communications between himself/herself and HENDERSON, in which HENDERSON stated that he would be driving a "white Challenger." In addition, according to the text messages, the sale was planned for some time after 6:00 p.m. The telephone number that Individual G used to communicate with HENDERSON was 502-XXX-4898, that is, Henderson/Phillips Pinger 4898.

108. Records for Henderson Phone 1 show that the phone utilized a cell tower in Midway, Kentucky, on or about May 6, 2017, at approximately 6:29 p.m., 6:34 p.m., and 6:35 p.m. Similarly, records for Phillips Phone 3 show that phone utilized a cell tower in Midway, Kentucky, on or about May 6, 2017, at approximately 6:27 p.m. and 6:29 p.m.

109. The time to crime for the Glock model 23, .40 caliber pistol, bearing serial number BBFY989, was approximately 63 days.

Following a Trip to Kentucky, Law Enforcement Recovered Two Firearms from PHILLIPS' Vehicle On August 24, 2017

110. On or about August 22, 2017, at approximately 5:00 p.m., information from the court-authorized tracking device on PHILLIPS' vehicle revealed that PHILLIPS' vehicle was traveling south from Chicago.³⁰ Tracker information further revealed that the vehicle made two brief stops in Hebron, Indiana, and Edinburgh, Indiana, before arriving in Louisville, Kentucky, later that evening.

111. Law enforcement obtained surveillance video footage from a gas station located in Hebron, Indiana. The surveillance video showed that PHILLIPS' vehicle arrived at the gas station accompanied by red Nissan Sentra. Law enforcement identified PHILLIPS as the driver of his 2016 Dodge Challenger, and HENDERSON as the passenger in the red Nissan Sentra. PHILLIPS and HENDERSON were in the company of two unidentified black females. A short while later, the Dodge Challenger and the Nissan Sentra exited the gas station in tandem.

112. On or about August 24, 2017, ATF agents conducted surveillance of PHILLIPS' vehicle in Louisville, Kentucky. Specifically, at the time surveillance was initiated at approximately 7:00 a.m., PHILLIPS' Dodge Challenger was parked in the parking lot of a hospital located in Louisville. At approximately 10:32 a.m., agents observed PHILLIPS exit the hospital and walk towards his Dodge Challenger. Upon

³⁰ On August 10, 2017, Chief Judge Rubén Castillo signed an order authorizing the installation of a vehicle tracking device on Phillips Vehicle 1 for a period of 45 days.

arriving at the Dodge Challenger, agents observed PHILLIPS open the passenger door of the vehicle while looking around the area. At approximately 10:34 a.m., agents observed a gray Chevrolet Impala enter the hospital parking lot and park in front of the Dodge Challenger. Agents further observed an unidentified male exited the Chevrolet Impala and approached PHILLIPS. Agents then observed PHILLIPS remove something from the Dodge Challenger and place it in the front passenger seat of the Impala. PHILLIPS returned to his vehicle and sat in the front passenger seat of the Dodge Challenger for a few minutes before exiting the Challenger and walking back into the hospital. Meanwhile, the unidentified male scanned the parking lot before returning to the Impala and departing the scene.

113. On or about August 24, 2017, at approximately 5:00 p.m., law enforcement learned that PHILLIPS' Dodge Challenger was driving north towards Illinois. After observing the driver of Phillips Vehicle 1 commit several traffic violations, law enforcement initiated a traffic stop of Phillips Vehicle 1 in Hillside, Illinois. During the traffic stop, law enforcement identified PHILLIPS as the driver of the vehicle; the only other occupant inside the vehicle was an infant in the back seat. Law enforcement observed that PHILLIPS' demeanor was nervous, as he was breathing heavily and trembling. Law enforcement further observed that PHILLIPS was using his iPhone to communicate with someone over the "FaceTime" application. Law enforcement ordered PHILLIPS to exit the vehicle, and PHILLIPS refused. PHILLIPS repeatedly related his location to the individual that he was communicating with over FaceTime. Eventually, PHILLIPS exited the vehicle, and,

at that point, an individual later identified as PHILLIPS' brother, Individual CP, arrived on scene.

114. After PHILLIPS exited his vehicle, a certified narcotics canine was brought to the scene. The canine indicated positive to the odor of narcotics. After the canine made the positive indication near the driver's door crease and handle, law enforcement observed PHILLIPS become more agitated. Law enforcement then conducted a search of Phillips Vehicle 1 and located a duffel bag in the trunk. Individual CP told law enforcement that the bag belonged to him. Inside of the duffel bag were the following items: (1) a Glock model 22, .40 caliber firearm, bearing serial number EEZ363; (2) a Glock model 26, 9-millimeter firearm, bearing serial number UCY868; (3) multiple magazines; (4) associated ammunition; and (5) fifty \$100 bills for a total of \$5,000. According to ATF records, the two Glock firearms recovered from Phillips Vehicle 1 were originally purchased in Kentucky.

115. PHILLIPS and Individual CP were arrested and transported to the Hillside Police Department. Following his arrest, law enforcement inventoried and towed Individual CP's vehicle. During the inventory search of the vehicle, law enforcement recovered a loaded Glock model 27, .40 caliber firearm, bearing serial number AAFH542, from the glove box. In addition, law enforcement recovered ammunition from the trunk of Individual CP's vehicle. According to ATF records, the Glock recovered from Individual CP's vehicle was originally purchased by Individual X, a gun seller, in Kentucky.

116. Law enforcement interviewed Individual X, who provided the following information:

a. Individual X stated that, on or about June 20, 2015, he/she purchased the Glock model 27, .40 caliber firearm, bearing serial number AAFH542 from Academy Sports located at 4901 Outer Loop Suite, Louisville, Kentucky.

b. Individual X stated that, on or about February 26, 2017, Individual F sold the Glock model 27, .40 caliber firearm, bearing serial number AAFH542 to Individual OO, a Kentucky resident, for \$400.

c. Individual X stated that he/she and Individual OO arranged the sale of the firearm through Facebook communications. Individual X provided the telephone number ending in 8869 as being the number he/she used to communicate with Individual OO.

117. Law enforcement also interviewed Individual OO, who stated that he/she had no recollection of purchasing the Glock model 27, .40 caliber firearm, bearing serial number AAFH542 from Individual X. During the interview, Individual OO was served a Warning Notice of Unlicensed Firearms Dealing in Violation of Federal Law, commonly referred to as a Cease and Desist letter.

PHILLIPS' Prior Felony Convictions

118. According to certified copies of convictions obtained from the Circuit Court of Cook County, PHILLIPS has been convicted of the following felony offenses prior to August 24, 2017, both of which were punishable by a term of imprisonment exceeding one year: (1) on or about August 25, 2014, PHILLIPS was convicted of felon

in possession of a firearm and sentenced to 3 years' imprisonment; and (2) on or about November 19, 2013, PHILLIPS was convicted of aggravated battery/use of a deadly weapon and sentenced to 30 months' probation.

Interstate nexus of Firearms Possessed by PHILLIPS on August 24, 2017

119. On or about August 24, 2017, an ATF firearms interstate nexus expert physically inspected each firearm purchased and seized by ATF from PHILLIPS on August 24, 2017, and determined that none of the firearms were manufactured in the State of Illinois.

Neither PHILLIPS, HENDERSON nor WRIGHT hold a Federal Firearms License

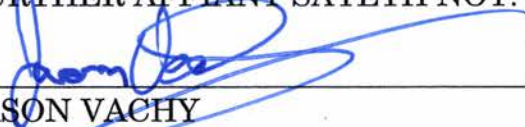
120. A Federal Firearms License (FFL) is a license in the United States that enables an individual or a company to engage in a business pertaining to the manufacture or importation of firearms and ammunition, or the interstate and intrastate sale of firearms. Review of a law enforcement database revealed that PHILLIPS, HENDERSON and WRIGHT were not, at all times relevant here, and never have been, federally licensed to import, manufacture, deal, or engage in the business of dealing in firearms.

121. To date, law enforcement has recovered approximately 80 to 90 firearms in and around the Chicago area that are believed to be purchased by HENDERSON and/or PHILLIPS in Kentucky.

CONCLUSION

122. Based upon the above information, there is probable cause to believe that HENDERSON, PHILLIPS, and WRIGHT willfully engaged in the business of dealing in firearms without being licensed firearms dealers, in violation of 18 U.S.C. § 922(a)(1)(A); and that PHILLIPS, a convicted felon, unlawfully possessed a firearm, in violation of 18 U.S.C. § 922(g)(1).

FURTHER AFFIANT SAYETH NOT.



JASON VACHY
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms &
Explosives

SUBSCRIBED AND SWORN to before me on May 9, 2018.



MARIA VALDEZ
United States Magistrate Judge