

SEALED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

FILED  
AUG 13 2014  
Phil Lombardi, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA, ) Case No. 13-CR-00028-JED  
)  
Plaintiff, ) FILED UNDER SEAL  
)  
v. ) FIFTH SUPERSEDING  
) INDICTMENT  
LORELL ANTONIO BATTLE, ) [COUNT 1: 21 U.S.C. §§ 846,  
a/k/a "Lorrel Battle", ) 841(b)(1)(A)(iii)(II) and  
a/k/a "Lorel Rufus Battle", ) 841(b)(1)(B)(vii) - Drug Conspiracy;  
a/k/a "Rufus Battle", a/k/a "Rufus", ) Forfeiture Allegation: 21 U.S.C.  
a/k/a "Hundred", a/k/a "West", ) § 853(a) - Drug Forfeiture;  
a/k/a "Wes", ) COUNTS 2, 4 & 8: 21 U.S.C.  
GAYWONE DEKEITH BLADES, ) §§ 841(a)(1) and 841(b)(1)(B)(iii)(II) -  
a/k/a "Junior Blades", ) Possession With Intent to Distribute  
a/k/a "Lil Gator Blades", ) Cocaine and Cocaine Base;  
a/k/a "Kawone Blades", ) COUNTS 3, 5, 9 & 16-32: 21 U.S.C. §  
a/k/a "Kawone Shills", ) 856 - Maintaining a Drug Involved  
a/k/a "Gaywone Shills", ) Premises;  
a/k/a "Kawone Shields", ) COUNTS 6 & 10: 18 U.S.C.  
a/k/a "Baby West Blades", ) § 924(c)(1)(A)(i) - Possession of  
a/k/a "Gator", a/k/a "Lil West", ) Firearms in Furtherance of Drug  
a/k/a "Lil 100" ) Trafficking Crimes;  
CLINT JOHNSON, ) COUNTS 7 & 11: 18 U.S.C.  
a/k/a "Mook", ) §§ 922(g)(1) and 924(e)(1) - Felon in  
DONALD WALTERS, ) Possession of Firearms and  
a/k/a "Lil D", a/k/a "Donald Grey", ) Ammunition;  
a/k/a "Deezy", a/k/a "Little Shitty", ) COUNT 12: 18 U.S.C. §§ 1513(f) and  
ROBERT PEARSON, ) 1513(a)(2) - Conspiracy to Retaliate  
a/k/a "Pookie", a/k/a "Pookie D", ) Against a Witness and Informant;  
SERGIO GONZALEZ, ) COUNT 13: 18 U.S.C. §§  
a/k/a "El Don", ) 1513(a)(1)(A), 1513(a)(1)(B) and  
KENYA WALKER, ) 1513(a)(2) - Retaliation Against a  
a/k/a "Ken Yo", a/k/a "K.Y.", ) Witness and Informant;  
a/k/a "Big Sleepy", ) COUNT 14: 18 U.S.C.  
JAMAR STEWART, ) §§ 924(c)(1)(A)(iii) and 924(j)(1) - Use  
a/k/a "J" ) and Discharge of a Firearm During  
RODNEY PARKER, ) and in Relation to a Crime of Violence  
a/k/a "Shrek", a/k/a "Parks", ) Causing Murder;  
a/k/a "R.P." ) COUNT 15: 21 U.S.C. §§ 848(a),  
DEMONN PARKER, ) 848(b), 848(c), and 848(d) - Continuing

a/k/a "Nephew", a/k/a "Vic",	)
a/k/a "Running Back", a/k/a "RB"	)
CHARLES AMOS,	)
a/k/a "Hussain"	)
CHERYL RYANS,	)
JAMAR BOWENS,	)
KEWON NEWTON,	)
TONY LAGRONE,	)
CLARENCE REED,	)
a/k/a "Unc"	)
DONYALE STANCLE,	)
a/k/a "Boo",	)
DEMARCUS JOHNSON,	)
a/k/a "Mac-10", a/k/a "Kain",	)
AUBREY CARWILE,	)
a/k/a "Traffic",	)
MARIO WALTERS,	)
a/k/a "Rio",	)
MARCOS CERECERES,	)
a/k/a "Markos",	)
GABRIEL MARTINEZ,	)
MYRON MARZETT,	)
a/k/a "Gizmo",	)
MARVIN SMITH,	)
a/k/a "Messy",	)
JOHN D. WASHINGTON,	)
a/k/a "J.D.",	)
CARL COOPER,	)
a/k/a "Coop",	)
CORRY PURIFY,	)
ADRIAN CAMPBELL,	)
a/k/a "Baby Co",	)
MICHAEL DEWAYNE	)
WASHINGTON,	)
a/k/a "Mike Seals,	)
a/k/a "Big Mike",	)
DON WALKER,	)
a/k/a "Chucky",	)
DOYLE BROWN,	)
MICHAEL TINSLEY,	)
CHANTZ LUCAS,	)

) Criminal Enterprise;  
 ) COUNT 33: 18 U.S.C. § 371, 7 U.S.C. §  
 ) 2156(b) - Conspiracy to Sponsor and  
 ) Exhibit an Animal in an Animal  
 ) Fighting Venture;  
 ) COUNTS 34 through 49: 21 U.S.C. §§  
 ) 841(a)(1) and 841(b)(1)(C) -  
 ) Distribution of cocaine;  
 ) COUNT 50: 18 U.S.C. § 924(o) -  
 ) Conspiracy to Possess a Firearm;  
 ) COUNTS 51 to 238: 21 U.S.C. § 843(b)  
 ) - Use of a Communication Facility in  
 ) Committing, Causing and Facilitating  
 ) the Commission of a Drug Trafficking  
 ) Felony]

a/k/a "Beard", )  
 TERRY BOCOOK, )  
 SHABOHEAM BAILEY, )  
 DWAYNE BRUCE, )  
 a/k/a "Bruce", )  
 CHADRICK COLBERT, )  
 DEON DELOUISER, )  
 DARON HARRIS, )  
 a/k/a "P Rock", )  
 BRENDA WALKER, )  
 DIANE WALTERS, )  
 HARRIENE HALE, )  
 a/k/a "Tisha Hale, )  
 a/k/a "Big Package" )  
 HIRAM STANCLE, )  
 a/k/a "Dean", )  
 FNU LNU #1, )  
 a/k/a "Tiger", )  
 FNU LNU #2, )  
 a/k/a "Chicken Man", )  
 FNU LNU #3, )  
 a/k/a "Rocky", )  
 FNU LNU #4, )  
 FNU LNU #5, )  
 FNU LNU #7, )  
 FNU LNU #8, )  
 FNU LNU #11, )  
 a/k/a "Lic", )  
 )  
 )  
**Defendants.** )

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[21 U.S.C. § 846]**  
**INTRODUCTION**

At all times relevant to this Fifth Superseding Indictment:

1. Large transnational drug trafficking organizations (DTOs) operating in

South America, Central America, and Mexico arranged for the manufacturing, processing, shipment, smuggling, and importation of controlled substances into the United States.

2. The Sinaloa Cartel, a large DTO, operated in Mexico, and along the southwest border of the United States.

3. The Los Zeta Cartel (Zetas Cartel) is a large DTO operated in Mexico, and known for the violence associated with its drug trafficking activity.

4. Zetas Cartel associates and conspirators controlled part of the illegal drug distribution activity in the Dallas, Texas, and by using Dallas-based distributors to market and distribute cocaine to other trafficking groups.

5. Associates conducted trafficking operations by using intimidation, including displaying weapons, and violence to collect debts, and expand and solidify their trafficking activity.

6. From time to time, associates of the Zetas Cartel would and did collect debts owed them by show of force, including displaying weapons, and usually required the transfer of property to satisfy debts incurred for drug purchases.

7. Members of the Walters DTO were at times also supplied by associates of the Sinaloa Cartel.

8. Defendant **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, operated a DTO (the Walters DTO) in the Northern District of Oklahoma. The Walters DTO’s principal objectives were to obtain cocaine

and marijuana from foreign sources, including the Sinaloa Cartel and the Zetas Cartel; to distribute it to mid-level distributors; to process the cocaine into cocaine base, commonly referred to as “crack”, to distribute the drugs and to enrich themselves through the collection proceeds generated by illegal drug sales. The Walters DTO used these proceeds to purchase more cocaine to sell in the Northern District of Oklahoma and elsewhere and reward the members of the Walters DTO, through the sharing of projects.

9. Members of the Walters DTO were members and associates of a criminal street gang known as the “Hoover Crips”, which operated as an ongoing group, organization and association with five and more persons that had as primary purposes the commission of violations of federal law including, but not limited to: felonies relating to controlled substances; (2) felony crimes of violence; and (3) conspiracies to commit such criminal offenses, including the conspiracy charged and described in Count Twelve.

Within the “Crips” street gang, there are various groups or sets that associate together, for example the “107” Hoover Crips, the 54th Street Hoover Crips and the “Neighborhood” Crips. Different sets of the “Crips” associate with the “Hoover Crips” set in certain criminal endeavors such as drug trafficking related activity. However, at times disputes arise between sets that are settled in various ways, including violence involving firearms.

### **THE CONSPIRACY**

Beginning as early as in or about April 2011, a more exact date being unknown to the Grand Jury, and continuing thereafter to the date of this Fifth Superseding Indictment,

in the Northern District of Oklahoma, and elsewhere, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes” (**LORELL BATTLE**), **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West”, a/k/a “Lil 100” (**BLADES**), **CLINT JOHNSON**, a/k/a “Mook”, (**CLINT JOHNSON**), **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty” (**DONALD WALTERS**), **ROBERT PEARSON**, a/k/a “Pookie”, a/k/a “Pookie D” (**PEARSON**), **SERGIO GONZALEZ**, a/k/a “El Don” (**GONZALEZ**), **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy” (**KENYA WALKER**), **JAMAR STEWART**, a/k/a “J” (**STEWART**), **RODNEY PARKER**, a/k/a “Shrek”, a/k/a “Parks”, a/k/a “R.P.” (**RODNEY PARKER**), **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, a/k/a “RB” (**DEMONN PARKER**), **CHARLES AMOS**, a/k/a “Hussain” (**AMOS**), **KEWON NEWTON** (**NEWTON**), **TONY LAGRONE** (**LAGRONE**), **DONYALE STANCLE**, a/k/a “Boo” (**DONYALE STANCLE**), **DEMARCUS JOHNSON**, a/k/a “Mac-10”, a/k/a “Kain” (**DEMARCUS JOHNSON**), **AUBREY CARWILE**, a/k/a “Traffic” (**CARWILE**), **MARIO WALTERS**, a/k/a “Rio” (**MARIO WALTERS**), **MARCOS CERECERES**, a/k/a “Markos” (**CERECERES**), **GABRIEL MARTINEZ** (**MARTINEZ**), **MYRON MARZETT**, a/k/a “Gizmo” (**MARZETT**), **MARVIN SMITH**, a/k/a “Messy”

**(SMITH), JOHN DAVID WASHINGTON, a/k/a “J.D.” (JOHN WASHINGTON), CARL COOPER, a/k/a “Coop” (COOPER), CORY PURIFY (PURIFY), ADRIAN CAMPBELL, a/k/a Baby Co” (ADRIAN CAMPBELL), MICHAEL DEWAYNE WASHINGTON, a/k/a “Mike Seals”, a/k/a “Big Mike” (MICHAEL WASHINGTON), DON WALKER, a/k/a “Chucky” (DON WALKER), MICHAEL TINSLEY (TINSLEY), CHANTZ LUCAS, a/k/a Beard” (LUCAS), TERRY BOCOOK (BOCOOK), SHABOHEAM BAILEY (BAILEY), DWAYNE BRUCE, a/k/a “Bruce” (BRUCE), CHADRICK COLBERT (COLBERT), DEON DELOUSER (DELOUSER), DARON HARRIS, a/k/a “P. Rock” (HARRIS), FNU LNU # 1, a/k/a “Tiger”, FNU LNU #2, a/k/a “Chicken Man”, FNU LNU #3, a/k/a “Rocky”, FNU LNU #4, FNU LNU #5, FNU LNU #7, FNU LNU #8, the defendants herein, together and with others known and unknown to the Grand Jury (collectively “the conspirators”), did willfully, knowingly, and intentionally combine, conspire, confederate and agree, each with the other, to commit offenses against the United States as follows:**

## **OBJECTS OF THE CONSPIRACY**

The objects of the conspiracy were:

1. To possess with intent to distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a/k/a “crack”, a Schedule II controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii)(II); and
2. To distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a/k/a “crack”, a Schedule II controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii)(II).
3. To possess with intent to distribute 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).
4. To distribute 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

## **MEANS AND METHODS OF THE CONSPIRACY**

The objects of the conspiracy were to be and were accomplished by the following means and methods, among others:

1. The conspirators would and did buy cocaine from distributors associated with the Zetas Cartel and the Sinaloa Cartel in the Dallas area.



2. The conspirators would and did use Oklahoma City as a base of operations.
3. Unindicted co-conspirator # 23 would and did distribute cocaine to the Walters DTO.
4. Members and associates of the Walters DTO would and did obtain, process, and distribute cocaine and return proceeds to unindicted co-conspirator #23 or others. That person in turn paid **GONZALEZ** for drug debts in order to obtain additional cocaine for distribution.
5. With the tacit agreement of their suppress members, the Walter DTO would and did from time to time obtain cocaine from other sources based on an availability of cocaine. The conspirators knew and accepted that arrangement as a practical result of the supply and demand associated with cocaine trafficking.
6. Unindicted co-conspirator #23 would and did obtain cocaine from sources, including **GONZALEZ**, and distribute that cocaine to the Walters DTO for subsequent distribution in the Northern District of Oklahoma and elsewhere.
7. A person known to the Grand Jury would and did obtain marijuana from sources and distribute the marijuana to members of the Walters DTO for distribution in Northern District of Oklahoma and elsewhere.
8. **DONALD WALTERS** would and did distribute the cocaine to other members of the Walters DTO who would at times “cook” the cocaine, that is process the cocaine into cocaine base, commonly referred to as “crack” cocaine.

9. Various co-conspirators, including **LORELL BATTLE**, would and did operate and use houses and other places in the Northern District of Oklahoma for the processing and selling of cocaine base, a/k/a “crack” in the Northern District of Oklahoma and elsewhere.

10. Various co-conspirators would and did use vehicles to transport cocaine and facilitate the distribution of cocaine in the Northern District of Oklahoma.

11. During the course of the conspiracy, conspirators would and did generate income from drug trafficking activity. Some of that income was used to facilitate activity such as dog fighting, gambling, travel, and the purchase of vehicles or other assets.

12. During the course of the conspiracy, conspirators would and did discuss activity relating to the disposition and use of proceeds generated from drug trafficking activity. For example, **DONALD WALTERS** and **KENYA WALKER** trained dogs for fighting by bringing dogs to a location in Tulsa and having a “training” fight. Further, conspirators discussed not feeding dogs to enhance their fighting ability.

13. During the course of the conspiracy, co-conspirators travelled to locations outside the Northern District of Oklahoma to attend dog fighting activity where drug proceeds were used to gamble on fights, purchase dogs, and transport dogs for dog fighting events.

14. During the crime of the conspiracy, co-conspirators would and did travel to locations, including Las Vegas, Nevada, and discuss drug trafficking operations involving the Walters DTO.

15. During the course of the conspiracy, co-conspirators would and did travel in interstate commerce to deliver controlled substances to other co-conspirators including travel from Texas to Oklahoma and from Oklahoma to Ohio.

16. During the course of the conspiracy, co-conspirators would and did utilize cellular telephones, including text messaging to facilitate and conduct activity related to trafficking in controlled substances.

17. Co-conspirators would and did conduct counter surveillance and other behavior in an effort to detect law enforcement activity. Said counter surveillance included, look outs, erratic and evasive driving, clandestine behavior, the use of stash houses, hidden compartments, hidden drug containers, secreting controlled substances and disposing of controlled substances by swallowing and otherwise.

18. During the course of the conspiracy, co-conspirators would and did attempt to identify persons cooperating with law enforcement with the intent to adjust their conspiratorial activity to avoid detection and suppress cooperation by intimidation and threats of and actual use of violence.

19. During the course of the conspiracy, co-conspirators would and did use the threat of violence and actual violence in an effort to prevent communication with law enforcement and to retaliate against individuals who provided information to law enforcement.

20. During the course of the conspiracy, co-conspirators would and did possess and use firearms in furtherance of and during and in relation to drug trafficking activity.

Said firearm possession and use was done by co-conspirators in order to protect conspirator objectives, profits, proceeds, product, and retaliate against others for perceived actual disagreements and rivalry pertaining to conspiracy activity and associations.

21. During the course of the conspiracy, co-conspirators would and did routinely check various electronic court related document systems to determine the status of individual court cases, arrests, and dispositions. Additionally, co-conspirators would analyze law enforcement activity as reflected in filed documents in order to adjust their conspiratorial behavior to avoid detection by law enforcement including attempts to detect physical surveillance and electronic surveillance.

22. During the course of the conspiracy, co-conspirators would associate with street gang members, the "Hoover Crips", in order to facilitate and operate their drug enterprise. Said association would afford the co-conspirators with cooks, distributors, managers, locations, vehicles, phones, protections, weapons, customers and currency used in the obtaining and distribution of controlled substances. Said association is designed to insulate ranking members of the organization, provide numerous "soldiers" in the drug enterprise and facilitate the operation of the drug enterprise.

23. During the course of the conspiracy, co-conspirators would and did use coded terms in communications in an effort to disguise the true nature of the communications. Some, but not all, of the terms used and their enterprise meanings are listed below:

- a. "Bump into" you/me/him = contact or meet for a transaction
- b. "Come see" you/me/him = contact or meet for a transaction
- c. "Pull up on" you/me/him = contact or meet for a transaction
- d. "Holla at you" you/me/him = contact or meet for a transaction
- e. "Wanna work out" = make sales or purchase
- f. "Lemme grab one/some" = quantity of drugs
- g. "You got somethin' for the head" = drugs
- h. Go to the gym/Gonna bring my gym clothes = distribute drugs
- i. Let me/I need to "get on" with you = need you to supply me with drugs (i.e. put me on)
- j. "Loud" = marijuana
- k. "MM" = medical marijuana
- l. "Tree" = marijuana
- m. "Something to smoke" = marijuana
- n. "Hard" = crack
- o. "quarter" = 1/4 oz
- p. "onion" = one oz crack
- q. "white girl" = powder cocaine
- r. "the spot" = location to distribute
- s. Shoe size = quantity (typically in grams) of crack
- t. Lil 7 = 7 grams / 0.25 oz.

- u. M.V. = 7 grams
- v. "Half" = half ounce = 14 grams
- w. "Lil girl" or "Teener" or "Teenager" = 1/16 oz. or 1.7 grams
- x. "Eight ball" = 1/8 oz
- y. "KD" = 3.5 grams = 1/8 oz
- z. Hours (i.e. work out for 2 hours) = 2 kilograms (How many hours you wanna work out)
- aa. "Cup of that" = usually 63 grams of cocaine
- bb. "Chevy" = 63 grams of cocaine
- cc. "Gonna be light" = few thousand dollars short
- dd. Having "a spot" in a car/house/etc = hiding compartment
- ee. "Bring the AR out" = AR-15 assault rifle
- ff. "Thump" = gun (i.e. You know anyone that needs a thump?)
- gg. "Strap" = gun
- hh. "Stack" = \$1,000 (i.e. it will cost you 7 stacks)
- ii. "Bill" = \$100 (i.e. you owe me three bills)
- jj. "Hooded on" or "Hooded up" = allegiance to the gang (i.e. He's good because he's hooded up.)
- kk. "Soldiers" = street level gang members and shooters
- ll. "one the set" = in the gang (i.e. He's cool. He's on the set)
- mm. "on paper" = he's on probation
- nn. "wet" = high on PCP

oo. “let them bump a little bit” = let the dogs fight

24. During the course of the conspiracy, co-conspirators would attempt to have electronic communications security by “dropping” cellular telephones on a routine basis in order to avoid law enforcement detection. Additionally, phones would be dropped upon law enforcement action.

25. During the course of the conspiracy, co-conspirators would travel in interstate commerce to facilitate the distribution of controlled substances in the Northern District of Oklahoma and elsewhere.

26. During the course of the conspiracy, co-conspirators operated several locations as drug distribution retail centers. These residences or apartments were staffed and operated on virtual 24 hour shifts and included, packaging, weighing, cooking, and distributing cocaine base, a/k/a “crack”, and marijuana. These retail centers often utilized clandestine locations to hide drugs and had security in place to monitor the transactions.

The locations used are listed below:

- a. 524 E. Tecumseh Street, Tulsa, Oklahoma
- b. 520 E. Tecumseh Street, Tulsa, Oklahoma
- c. 509 E. Tecumseh Street, Tulsa, Oklahoma
- d. 1135 N. Boston Place, Tulsa, Oklahoma
- e. 7707 E. 28th Court, Tulsa, Oklahoma,
- f. 1234 N. Olympia, Tulsa, Oklahoma
- g. 1214 N. Santa Fe, Tulsa, Oklahoma

- h. 1719 E. Oklahoma Street, Tulsa, Oklahoma
- i. 11011 E. 27th Street S., Tulsa, Oklahoma
- j. 2049 E. Woodrow Place, Tulsa, Oklahoma
- k. 2124 E. Concord Street, Broken Arrow, Oklahoma
- l. 2312 N. Wheeling Avenue, Tulsa, Oklahoma
- m. 2301 W. Tecumseh Street, Tulsa, Oklahoma
- n. 8434 N. 67th East Avenue, Tulsa, Oklahoma
- o. 2756 S. 114th East Avenue, Tulsa, Oklahoma
- p. 9124 East 49th Street, Tulsa, Oklahoma

27. During the course of the conspiracy, co-conspirators would secret monies obtained from the distribution of controlled substances in locations other than their own residences. That activity was an effort to prevent law enforcement from seizing and forfeiting proceeds of drug trafficking activity.

28. During the course of the conspiracy, co-conspirators would and did utilize drug consumers' residences as retail drug centers by moving in and taking control of the residences in order to distribute quantities of cocaine base, a/k/a "crack". Using threats and intimidation and providing payment in "crack", co-conspirators would render the actual resident of the locations a virtual "hostage" in their own home.

29. During the course of the conspiracy, co-conspirators would move locations of retail drug centers or "crack houses" in order to avoid detection by law enforcement.



At times, co-conspirators were concerned about “heat” at specific locations and would communicate about potential surveillance and would move locations to avoid detection.

30. Co-conspirators would and did gain the cooperation of management and leasing authorities at two apartment complexes where retail drug sales were conducted.

31. Co-conspirators would and did exchange crack cocaine for the use of various apartment complexes in order to store and sell crack cocaine at those locations.

32. Co-conspirators would and did engage in gunfights in order to settle feuds with rival gang members or those thought to have intent or interests contrary to the co-conspirators’ interests.

33. Co-conspirators would and did refuse to cooperate with law enforcement investigating shooting incidents. Said refusal to cooperate was conducted to obscure from law enforcement the mutual antagonism between the co-conspirators and the perpetrators of violent acts.

34. **LORELL BATTLE, BLADES**, and other known to the Grand Jury, would and did utilize apartments as “crack houses” in apartment complexes located at or near the 61st Street and Peoria Avenue area in Tulsa, Oklahoma, as locations to conduct sales and other distributions of “crack cocaine” and marijuana for the Walters DTO.

35. **LORELL BATTLE, BLADES**, and others known to the Grand Jury, would and did use other known and unknown co-conspirators as “lookouts” at the apartment complexes or other locations when sales and other distributions of “crack cocaine” and marijuana were conducted for the Walters DTO.

36. During the course of the conspiracy, co-conspirators would and did use multiple cellular telephones to communicate with each other and with unindicted co-conspirators, known and unknown, when conducting sales and other distributions of “crack cocaine” and marijuana for the Walters DTO.

37. During the course of the conspiracy, conspirators would and did employ firearms at the apartment complexes when engaged in sales and distributions of “crack cocaine” and marijuana to protect themselves, their drugs, and the money they received, and to intimidate others.

38. It was a part of the conspiracy and understood that individual co-conspirators could contact their own sources, cultivate their own customers, and otherwise act alone when they desired, but although there were periodic arguments and disagreements, the co-conspirators acted with knowledge and/or support of each other’s unlawful cocaine, marijuana and cocaine base distribution activities and each conspirator at some time during the course of the conspiracy knowingly and intentionally agreed and acted together jointly with other co-conspirators to advance the common overall goal of buying and selling cocaine, marijuana and cocaine base.

#### **OVERT ACTS**

1. From approximately April 2011 until approximately August 2012, **DONALD WALTERS** and **PEARSON** supplied cocaine and/or cocaine base to co-conspirator #1, **LORELL BATTLE**, co-conspirator #2, **BLADES**, and others known and unknown to the Grand Jury in Tulsa, Oklahoma.

2. On or about April 30, 2011, **LORELL BATTLE** possessed cocaine base and marijuana hidden in a 2000 Ford Mustang, Oklahoma tag 113-BFE and \$500 U.S. currency while at or near 6600 S. Zunis Avenue, Tulsa, Oklahoma.

3. From approximately June 2011 until approximately December 2011, **LORELL BATTLE**, co-conspirator #1, and others known and unknown to the Grand Jury, did knowingly and intentionally use and maintain, and cause to be used and maintained, various apartments within the Saddlebrook Apartment Complex located at 1400 East 62nd Street, Tulsa, Oklahoma for the purpose of storing, distributing and using cocaine base. (Rule 11 interviews) Said apartments were obtained and used with the knowledge of management of the Saddlebrook Apartments.

4. On or about December 1, 2011, **LORELL BATTLE**, co-conspirator #2, and co-conspirator #1 possessed marijuana and approximately 65.64 grams of cocaine base, a/k/a "crack", at 1429 East 62nd Street, Apartment A, Tulsa, Oklahoma and 1425 East 62nd Street, Apartment B, Tulsa, Oklahoma. Said cocaine base, a/k/a "crack", was to be distributed.

5. On or about December 1, 2011, **LORELL BATTLE**, co-conspirator #2, and co-conspirator #1, knowingly possessed nineteen rounds of ammunition at 1429 East 62nd Street, Apartment A, Tulsa, Oklahoma.

6. On or about December 14, 2011, co-conspirator #3 conducted counter-surveillance for **LORELL BATTLE**, co-conspirator #1, and co-conspirator #2 while

**LORELL BATTLE** and others distributed cocaine base from 1425 East 62nd Street, Apartment D, Tulsa, Oklahoma.

7. On or about December 14, 2011, **LORELL BATTLE**, co-conspirator #1, co-conspirator #2, and co-conspirator #3 possessed a loaded Colt 45 handgun, serial number W100689 and a loaded Taurus 9mm handgun, serial number TZ652400 while distributing cocaine base from 1425 East 62nd Street, Apartment D, Tulsa, Oklahoma.

8. On or about December 14, 2011, **LORELL BATTLE**, co-conspirator #1, co-conspirator #2, and co-conspirator #3 possessed with intent to distribute approximately 83.98 grams of cocaine base and marijuana at 1425 East 62nd Street, Apartment D, Tulsa, Oklahoma.

9. On or about December 15, 2011, unindicted co-conspirator #4 **LORELL BATTLE** and co-conspirator #1 possessed with the intent to distribute approximately 181.82 grams of marijuana at 1425 East 62nd Street, Apartment Q, Tulsa, Oklahoma.

10. On or about December 15, 2011, unindicted co-conspirator #4 attempted to hide evidence of drug distribution by throwing approximately 181.82 grams of marijuana out of the window of 1425 East 62nd Street, Apartment Q, Tulsa, Oklahoma.

11. On or about January 5, 2012, co-conspirator #2 and co-conspirator #5 both possessed a loaded Hi Point .40 caliber handgun, serial number X720447.

12. On or about January 5, 2012, co-conspirator #2 possessed cocaine base while driving a 1998 Jeep SUV, Oklahoma tag 340-FMS at 5955 South Lewis Avenue, Tulsa, Oklahoma.

13. On or about January 6, 2012, **LORELL BATTLE** and co-conspirator #1 possessed proceeds from drug sales totaling approximately \$2,211 U.S. currency at 1140 East 61st Street, Apartment 41, Tulsa, Oklahoma.

14. On or about January 6, 2012, **LORELL BATTLE** and co-conspirator #1, possessed a loaded Hi Point 9mm handgun, serial number P1308587 at 1140 East 61st Street, Apartment 41, Tulsa, Oklahoma.

15. On or about August 21, 2012, co-conspirator #1 attempted to elude law enforcement action and avoid apprehension while driving a 2004 Chrysler 300, after departing 1225 East 63rd Street, Apartment C, Tulsa, Oklahoma.

16. From approximately August 2012 until approximately September 13, 2013, **PEARSON** possessed and distributed crack cocaine.

17. On or about January 2013, **BLADES** possessed a handgun while driving co-conspirator #6 Ford Mustang, Oklahoma tag.

18. On or about January 2013, **BLADES** fled law enforcement from the Promenade Mall, Tulsa, Oklahoma and avoided apprehension.

19. From approximately February 2013 until approximately March 2013, co-conspirator #6, **LORELL BATTLE**, **BLADES**, and co-conspirator #5 did knowingly and intentionally use and cause to be used, an apartment in the RiverGlen Apartment complex located in Tulsa, Oklahoma for the purpose of storing, distributing and using cocaine base, a/k/a "crack".

20. From approximately March 2013 until approximately April 2013, co-conspirator #7 Thomas Hunter, **LORELL BATTLE**, and **BLADES** did knowingly and intentionally use and maintain, and cause to be used and maintained, Apartment 26 at the Casa Linda Apartment Complex located at 1329 East 62nd Street, Tulsa, Oklahoma for the purpose of storing, distributing and using cocaine base.

21. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** possessed with the intent to distribute approximately 85 grams of cocaine base and 3 grams of marijuana at 1329 East 62nd Street, Apartment 26, Tulsa, Oklahoma.

22. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** both possessed a Ruger P89, serial number 31503116, a Sig Sauer P239 .40 caliber handgun, serial number SBU021115, and a Glock 23 .40 caliber handgun, serial number PXM594 at 1329 East 62nd Street, Apartment 26, Tulsa, Oklahoma.

23. On or about April 3, 2013, **LORELL BATTLE** and co-conspirator #8 knowingly participated in a telephonic conversation in which they discussed retrieving and distributing cocaine base in Tulsa, Oklahoma.

24. On or about April 3, 2013, **LORELL BATTLE** and co-conspirator #8 knowingly participated in a telephonic conversation in which they discussed manufacturing and distributing cocaine base in Tulsa, Oklahoma.

25. On or about April 4, 2013, **LORELL BATTLE**, co-conspirator #8 and co-conspirator #6 knowingly participated in a telephonic conversation in which they discussed distributing cocaine base in Tulsa, Oklahoma.

26. On or about April 5, 2013, co-conspirator #8 transported cocaine base to a residence located in Tulsa, Oklahoma at the direction of **LORELL BATTLE**.

27. On or about April 7, 2013, **LORELL BATTLE** and co-conspirator #8 knowingly participated in a telephonic conversation in which they discussed with co-conspirator #6 distributing cocaine base in Tulsa, Oklahoma.

28. On or about April 7, 2013, **LORELL BATTLE** and co-conspirator #8 knowingly participated in a telephonic conversation in which they discussed how to weigh cocaine base in order to distribute it.

29. On or about April 7, 2013, co-conspirator #8 and co-conspirator #9 weighed and packaged cocaine base at the direction of **LORELL BATTLE** in order to distribute it.

30. On or about April 8, 2013, **LORELL BATTLE** and co-conspirator #8 knowingly participated in a telephonic conversation in which they discussed transporting and distributing cocaine base to an unknown individual.

31. On or about April 9, 2013, **LORELL BATTLE**, co-conspirator #8, and co-conspirator #9 knowingly participated in a telephonic conversation in which they discussed and agreed to distribute cocaine base and provide the proceeds to co-conspirator #8.

32. On or about April 9, 2013, co-conspirator #8 allowed **DONALD WALTERS** to utilize her cellular telephone so he could knowingly participate in a telephonic conversation with **LORELL BATTLE** in which they discussed **LORELL**

**BATTLE's** arrest and what actions **DONALD WALTERS** could take to assist the situations of **LORELL BATTLE** and **BLADES** and how to care for **LORELL BATTLE's** fighting dogs.

33. On or about April 9, 2013, co-conspirator #8 distributed a quantity of cocaine base to **CLINT JOHNSON** at the direction of **LORELL BATTLE**.

34. On or about April 10, 2013, **LORELL BATTLE** and co-conspirator #8 knowingly participated in a telephonic conversation in which they discussed co-conspirator #8's distribution of cocaine base to **CLINT JOHNSON**.

35. On or about September 5, 2013, **CLINT JOHNSON** (passenger) and a person known to the Grand Jury, person #10 (driver), were in possession of and transporting marijuana, 21.0 grams of cocaine base, 6.19 grams of methamphetamine, and drug proceeds amounting to approximately \$2,181 U.S. currency.

36. During February 2014, co-conspirator #1 was assaulted in the Creek County Jail, Sapulpa, Oklahoma.

37. On February 22, 2014, **DONYALE STANCLE** and **JOHN WASHINGTON** knowingly participated in a telephonic conversation in which they discussed **JOHN WASHINGTON's** traffic stop the previous night and the questions law enforcement were asking. They discussed who was "snitching" and if they were in trouble. **DONYALE STANCLE** said, "Baby D (meaning **DONALD WALTERS**) is a fool if he doesn't think One Hundred (meaning **LORELL BATTLE**) ain't up there (snitching)."



38. Between approximately February 2013 and April 2013, **LORELL BATTLE** would and did obtain copies of an FBI FD-302 that identified members and associates of the Hoover Crips and the crimes they committed.

39. Between approximately February 2013 and April 2013, **LORELL BATTLE** would and did identify Anthony Campbell as the source of statements in the FBI FD-302.

40. Between approximately February 2013 and April 2013, Hoover Crips gang members, to include **LORELL BATTLE, BLADES, DONALD WALTERS,** and others planned a retaliation on Anthony Campbell based upon his cooperation with the FBI.

41. In approximately April, 2013, **DONALD WALTERS** and **LORELL BATTLE** discussed Anthony Campbell's FD-302 and determined that retaliation was warranted.

42. In approximately April 2013, **LORELL BATTLE** was paid a quantity of cocaine base to "take care of" Anthony Campbell.

43. On or about April 2, 2013, co-conspirator #8 and **LORELL BATTLE** participated in a telephonic communication in which co-conspirator #8 sent **LORELL BATTLE** the following text message: "You might already know, I just heard about it today. Just some shit I heard that I think I have to tell you about. Do you know Anthony Campbell."

44. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** would and did obtain firearms and ammunition to use in unlawful activities of the Hoover Crips, including retaliating against Anthony Campbell for being a witness in the Hoover Crips Robbery Crew trial (described in Count 12) and for providing information to law enforcement about street gang activities and other crimes.

45. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** would and did obtain a vehicle from co-conspirator #8 to use in retaliating against Anthony Campbell.

46. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** would and did obtain the address of Anthony Campbell and drove to that location.

47. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** would and did park near Anthony Campbell's residence.

48. On or about April 3, 2013, **LORELL BATTLE** would and did approach Anthony Campbell and discharged a firearm, during and in relation to a crime of violence, by shooting him approximately thirteen times at close range with a Ruger, Model P89, 9mm handgun, serial number 31503116.

49. On or about April 3, 2013, **LORELL BATTLE** inflicted bodily harm which resulted in the death of Anthony Campbell.

50. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** would and did flee the murder scene of Anthony Campbell in co-conspirator #8's vehicle and returned the vehicle to co-conspirator #8's residence.

51. On or about April 3, 2013, co-conspirator #8 pulled her vehicle into her garage at the request of **LORELL BATTLE** in order to hide it from law enforcement.

52. On or about April 3, 2013, **LORELL BATTLE** and **BLADES** would and did retreat to the apartment of co-conspirator #7, located at 1329 East 62nd Street, Apartment 26, Tulsa, Oklahoma, where they hid and stored clothing and the murder weapon.

53. On January 30, 2014, **DONALD WALTERS** and co-conspirator #11 knowingly participated in a telephonic communication in which they discuss Anthony Campbell's homicide, **LORELL BATTLE** getting the death penalty and paperwork. (TT#2, #02870)

54. On January 31, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which **RODNEY PARKER** asked if he knew **DONALD WALTERS** knew who "Guerillo" because he had beaten up **LORELL BATTLE** in jail. (TT#2, #03106)

55. On February 2, 2014, **DONYALE STANCLE** and **JAMAR STEWART** knowingly participated in a telephonic communication in which they discussed (in reference to **LORELL BATTLE**) that "he's in more trouble than one man's brain can even handle." "He (**LORELL BATTLE**) did 'that move' (killed Anthony Campbell) for Baby D? or himself?" They further discuss other Hoover Crips activity. (TT#3, #03270)

56. On February 10, 2014, **DONYALE STANCLE** and **RODNEY PARKER** discussed what **DONALD WALTERS** thought about **LORELL BATTLE** being in

custody. (“I wonder what Lil Shitty think about One hundred.” “Hundred in there (jail) gang bangin’ and shit (drawing attention).”) (TT#3, #04454)

57. On February 19, 2014, **DONALD WALTERS** and **LORELL BATTLE** (in jail) knowingly participated in a telephonic conversation in which they discussed **LORELL BATTLE**’s drug case and how co-conspirator #2 pleaded to 5 years. **DONALD WALTERS** asks about “his other kinfolk” (**BLADES**) and **LORELL BATTLE** says he “didn’t take anything” (didn’t plea out). They discuss breeding dogs and taking care/prepping dogs. (TT#2, #06640)

58. On February 19, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discuss **LORELL BATTLE** being upset at **RODNEY PARKER** because he isn’t doing anything for him (money on books). **RODNEY PARKER** says **LORELL BATTLE** was supposed to be in touch with him. **RODNEY PARKER** called co-conspirator #8 twice but she hasn’t called back. (TT#2, #06682)

59. On March 15, 2014, **DONALD WALTERS** and **LORELL BATTLE** knowingly participated in a telephonic communication in which **DONALD WALTERS** discusses getting money on **LORELL BATTLE**’s books and trying to take money by **LORELL BATTLE**’s mother’s house. They discuss the possibility of co-conspirator #1 snitching. Talk about Baby Bro (“**BLADES**”) still being in DL Moss “because he did the right thing.” (didn’t cooperate). (TT#2, #10235)

60. On May 3, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed their drug activities. **MARZETT** asked if **DONALD WALTERS** had given his name to “the Mexicans” because they just “popped up” on him and he owed them a bunch of money. **MARZETT** asked if **BLADES** was snitching because **MARZETT** heard something in jail. **DONALD WALTERS** said he put money on **BLADES’** books. (TT#9, #02222)

61. On or about February 5, 2013, **STEWART** (driver) and **DONYALE STANCLÉ** (passenger) transported marijuana paraphernalia, cocaine base, a/k/a “crack”, and approximately \$597 in US currency in a 2008 Dodge Charger, Oklahoma tag 453-DFJ in Tulsa, Oklahoma.

62. On or about February 5, 2013, **DONYALE STANCLÉ** ran from the scene of a traffic stop while handcuffed.

63. On or about February 5, 2013, **DONYALE STANCLÉ** spit out a small plastic baggy containing cocaine base, a/k/a “crack”, as he fled police.

64. On or about February 5, 2013, **STEWART** transported cocaine base, a/k/a “crack”, for distribution in a 2008 Dodge Charger, Oklahoma tag 453-DFJ.

65. On or about May 31, 2013, **KENYA WALKER** travelled with drug proceeds of approximately \$812 in US Currency while driving a 2009 Ford F150 truck, Oklahoma tag 320-FRP, in Tulsa, Oklahoma.

66. On or about May 31, 2013, **KENYA WALKER** attempted to covertly drop a plastic baggy containing approximately 22.17 grams of cocaine base, a/k/a “crack”, as he exited a patrol vehicle upon arrival at David L. Moss Detention Center.

67. On or about May 31, 2013, **KENYA WALKER** conducted a telephonic conversation with **STEWART** to ensure co-conspirator #12 recovered his/her cellular telephone in an attempt to defeat potential law enforcement recovery of additional evidence from the phone.

68. On or about May 31, 2013, **KENYA WALKER** conducted a telephonic conversation with **STEWART** from jail to recover and possess additional narcotics hidden “by the big tree by the garage.”

69. On or about June 19, 2013, co-conspirator # 13 (driver) and **DEMONN PARKER** (passenger) transported marijuana and cocaine base, a/k/a “crack”, when they were stopped by law enforcement while driving a 1999 Buick Park Avenue, Oklahoma tag 369-GER in Tulsa, Oklahoma.

70. On or about June 19, 2013, **DEMONN PARKER** transported 28.02 grams of cocaine base, a/k/a “crack”, for distribution which he had hidden under the passenger’s seat of a vehicle in an attempt to conceal it from law enforcement.

71. On or about June 26, 2013, **DEMONN PARKER** and Confidential Source #1 (CS-1) were in telephonic contact on at least three occasions in order to facilitate the purchase cocaine base, a/k/a “crack”.

72. On or about June 26, 2014, **PEARSON** transported approximately 7.5 grams of cocaine base, a/k/a “crack”, in his 2004 BMW 325ci, Oklahoma tag 476-JNZ, to a pre-arranged meet location in Tulsa, Oklahoma in order to distribute the cocaine to CS-1.

73. On or about June 26, 2013, **PEARSON** distributed approximately 7.5 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$300 U.S. currency.

74. On or about July 11, 2013, **RODNEY PARKER** and **DEMORN PARKER**, jointly agreed to distribute cocaine base, a/k/a “crack”, to CS-1 through a window of the residence located at 524 East Tecumseh Street, Tulsa, Oklahoma.

75. On or about July 11, 2013, **RODNEY PARKER** accepted \$350 U.S. currency from CS-1 as payment for cocaine base, a/k/a “crack”.

76. On or about July 11, 2013, **DEMORN PARKER** distributed approximately 6.08 grams of cocaine base, a/k/a “crack”, to CS-1 through the window of 524 East Tecumseh Street, Tulsa, Oklahoma, in exchange for money CS-1 provided to **RODNEY PARKER**.

77. On or about July 17, 2013, **PEARSON** transported approximately 86.5 grams of cocaine base, a/k/a “crack”, marijuana, a loaded Taurus “Judge” handgun, serial number ET451001, and approximately \$4,130 U.S. currency when he was stopped by law enforcement while driving his 2004 BMW 325ci, Oklahoma tag 476-JNZ, in Tulsa, Oklahoma.

78. On or about July 17, 2013, **PEARSON** concealed approximately 86.5 grams of cocaine and marijuana within a false bottom aerosol can that was specifically designed to conceal illegal narcotics.

79. On or about July 17, 2013, **PEARSON** knowingly possessed a loaded firearm, to wit a Taurus "Judge" handgun, serial number ET451001, which was loaded with three rounds of .410 gauge buck shot and two rounds of .45 caliber ammunition.

80. On or about July 18, 2013, **KENYA WALKER** and **STEWART** agreed to distribute cocaine base, a/k/a "crack", to CS-1 through the window of the residence located at 524 East Tecumseh Street, Tulsa, Oklahoma.

81. On or about July 18, 2013, **KENYA WALKER** and **STEWART** distributed approximately 6.08 grams of cocaine base, a/k/a "crack", through the window of the residence located at 524 East Tecumseh Street, Tulsa, Oklahoma, in exchange for \$350 U.S. currency.

82. On or about July 25, 2013, **DEMONN PARKER** agreed to provide cocaine base, a/k/a "crack", to CS-1 through the window of the residence located at 524 East Tecumseh Street, Tulsa, Oklahoma arrived at 524 East Tecumseh Street, Tulsa, Oklahoma.

83. On or about July 25, 2013, **DEMONN PARKER** distributed approximately 6.96 grams of cocaine base, a/k/a "crack", to CS-1 through the window of the residence located at 524 East Tecumseh Street, Tulsa, Oklahoma, in exchange for \$350 U.S. currency.



84. On or about July 25, 2013, **DEMONN PARKER** provided CS-1 with his personal cellular telephone number in order to conduct future drug related transactions.

85. On or about July 26, 2013, **DEMONN PARKER** and CS-1 were in at least two telephonic conversations in order to set up the distribution of cocaine base, a/k/a “crack”, at 524 East Tecumseh Street, Tulsa, Oklahoma.

86. On or about July 26, 2013, **STEWART** agreed with CS-1 to provide the narcotics that **DEMONN PARKER** previously agreed to provide CS-1 upon his/her arrival at 524 East Tecumseh Street, Tulsa, Oklahoma.

87. On or about July 26, 2013, **STEWART** distributed approximately 14.56 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$700 U.S. currency from 524 East Tecumseh Street, Tulsa, Oklahoma.

88. On or about July 26, 2013, **FNU LNU #1** conducted security for **STEWART** at 524 East Tecumseh Street, Tulsa, Oklahoma, while **STEWART** distributed cocaine base, a/k/a “crack”, to CS-1.

89. On or about July 30, 2013, **DEMONN PARKER** and CS-1 were in at least three telephonic conversations in order to set up the distribution of cocaine base, a/k/a “crack”, at 524 East Tecumseh Street, Tulsa, Oklahoma.

90. On or about July 30, 2013, **DEMONN PARKER** told CS-1 to “deal with me this time, though” in reference to the purchase of cocaine base, a/k/a “crack”.

91. On or about July 30, 2013, **DEMONN PARKER** distributed approximately 14.08 grams of cocaine base, a/k/a "crack", to CS-1 in exchange for \$750 U.S. currency from 524 East Tecumseh Street, Tulsa, Oklahoma.

92. On or about August 2, 2013, **STEWART** distributed approximately 6.16 grams cocaine base, a/k/a "crack", to CS-1 in exchange for \$350 U.S. currency from 524 East Tecumseh Street, Tulsa, Oklahoma.

93. On or about August 2, 2013, **DEMONN PARKER** and **FNU LNU #2** observed and provided security during a narcotics transaction between **STEWART** and CS-1 at 524 East Tecumseh Street, Tulsa, Oklahoma.

94. On or about August 5, 2013, **STEWART** opened the front door of 524 East Tecumseh Street, Tulsa, Oklahoma, to allow CS-1 inside to purchase cocaine base, a/k/a "crack",.

95. On or about August 5, 2013, **KENYA WALKER** distributed approximately 24.63 grams of cocaine base, a/k/a "crack", to CS-1 in exchange for \$1,400 U.S. currency from 524 East Tecumseh Street, Tulsa, Oklahoma.

96. On or about August 5, 2013, **STEWART** and an unknown black female, **FNU LNU #4**, observed and monitored **KENYA WALKER** distribute cocaine base, a/k/a "crack", to CS-1 at 524 East Tecumseh Street, Tulsa, Oklahoma.

97. On or about August 8, 2013, **KENYA WALKER** distributed approximately 26.39 grams of cocaine base, a/k/a "crack", to CS-1 in exchange for \$1,400 U.S. currency at 524 East Tecumseh Street, Tulsa, Oklahoma.

98. On or about August 9, 2013, a black male, **FNU LNU #5**, observed and provided security while **KENYA WALKER** distributed cocaine base, a/k/a “crack”, to CS-1 at 524 East Tecumseh Street, Tulsa, Oklahoma.

99. On or about August 11, 2013, co-conspirator #14 Tonia Hunt transported a small quantity of cocaine base, a/k/a “crack”, for **STEWART** departing 524 East Tecumseh Street, Tulsa, Oklahoma, while driving a 2006 Cadillac SRX, Oklahoma tag 320-JQG.

100. On or about August 22, 2013, **KENYA WALKER** and CS-1 were in at least two telephonic conversations in order to set up the distribution of cocaine base, a/k/a “crack”, at 524 East Tecumseh Street, Tulsa, Oklahoma.

101. On or about August 22, 2013, **KENYA WALKER** distributed a quantity of cocaine base, a/k/a “crack”, to **KEWON NEWTON**, in the presence of CS-1 at 520 East Tecumseh Street, Tulsa, Oklahoma.

102. On or about August 22, 2013, **KENYA WALKER** distributed approximately 12.26 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$700 U.S. currency from inside his vehicle, a 2006 Chevrolet Impala, Oklahoma tag 359-HTH, registered to co-conspirator # 12 at 1234 North Olympia Avenue, Tulsa, Oklahoma, while it was parked at 520 East Tecumseh Street, Tulsa, Oklahoma.

103. On or about August 22, 2013, **KENYA WALKER** questioned CS-1 regarding the status of his/her court case and to see if he/she “was straight”, meaning if she was cooperating with law enforcement.

104. On or about August 27, 2013, **DEMONN PARKER** and CS-1 were in at least three telephonic conversations to set up the distribution and discuss previous distribution of cocaine base, a/k/a “crack”, at 1135 North Boston Place, Tulsa, Oklahoma.

105. On or about August 27, 2013, **DEMONN PARKER** told CS-1 to arrive at 1135 North Boston Place, Tulsa, Oklahoma, to purchase cocaine base, a/k/a “crack”,.

106. On or about August 27, 2013, **DEMONN PARKER** distributed approximately 15.24 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$700 U.S. currency at 1135 North Boston Place, Tulsa, Oklahoma.

107. On or about August 27, 2013, **DONALD WALTERS** and an unknown black male, fnu lnu #6, observed **DEMONN PARKER** distribute cocaine base, a/k/a “crack”, to CS-1 at 1135 North Boston Place, Tulsa, Oklahoma.

108. On or about August 27, 2013, **DEMONN PARKER** and CS-1 were in a telephonic conversation in which **DEMONN PARKER** confirmed previous warnings he made to CS-1 to avoid co-conspirator #14 and to confirm the presence of **DONALD WALTERS** at 1135 North Boston Place, Tulsa, Oklahoma, when **DEMONN PARKER** distributed cocaine base, a/k/a “crack”, to CS-1 earlier on that day.

109. On or about September 4, 2013, **AUBREY CARWILE** and CS-1 were in a telephonic conversation in setting up the distribution of cocaine base, a/k/a “crack”.

110. On or about September 4, 2013, **KENYA WALKER** distributed approximately 6.05 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$350 U.S. currency from 524 East Tecumseh Street, Tulsa, Oklahoma.

111. On or about September 4, 2013, a co-conspirator #50 observed and provided security for **KENYA WALKER** while he distributed cocaine base, a/k/a “crack”, to CS-1 at 524 East Tecumseh Street, Tulsa, Oklahoma.

112. On or about September 13, 2013, **PEARSON** transported approximately 168.9 grams of cocaine base, a/k/a “crack”, and approximately \$10,401 U.S. currency, digital scales, and a night vision scope while driving a 2004 BMW 325ci, Oklahoma tag 476-JNZ, in Tulsa, Oklahoma.

113. On or about September 26, 2013, **STEWART** possessed approximately \$3,376 U.S. currency in drug proceeds while driving his 2007 Audi Q7, Oklahoma tag 021-KFT.

114. On or about October 2, 2013, **STEWART** and **RODNEY PARKER** possessed and transported marijuana in **RODNEY PARKER**'s 2007 GMC Denali, Oklahoma tag 601-DTO after leaving 1719 East Oklahoma Street, Tulsa, Oklahoma.

115. On or about October 2, 2013, **STEWART** and **RODNEY PARKER** conducted counter-surveillance of drug activity at 1719 East Oklahoma Street, Tulsa, Oklahoma in **RODNEY PARKER**'s 2007 GMC Denali, Oklahoma tag 601-DTO.

116. On or about October 7, 2013, **AMOS** distributed cocaine base, a/k/a “crack”, at 524 East Tecumseh Street, Tulsa, Oklahoma.

117. On or about October 7, 2013, **AMOS** was transported a Glock 19 9mm semiautomatic weapon, serial number NXZ217, in a 2010 Dodge Nitro, Oklahoma tag 745-HMX, near 2700 East Admiral Boulevard.

118. On or about October 10, 2013, **STEWART** met with CS-1 in his 2007 Audi Q7, Oklahoma tag 021-KFT and agreed to distribute cocaine base, a/k/a “crack”, to CS-1.

119. On or about October 10, 2013, **KENYA WALKER** distributed approximately 14.54 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$700 U.S. currency at 524 East Tecumseh Street, Tulsa, Oklahoma.

120. On or about October 10, 2013, two unknown black males, **FNU LNU #7** and **FNU LNU #8**, observed and provided security during a narcotics transaction between **KENYA WALKER** and CS-1.

121. On or about October 21, 2013, **DONYALE STANCLE** and **DEMARCUS JOHNSON** transported approximately \$940 U.S. currency in drug proceeds while driving a Hyundai Sonata, Florida license plate 209-MLX from the 500 block of East Tecumseh Street to the 1200 block of East Young Street, Tulsa, Oklahoma.

122. On or about October 21, 2013, **KENYA WALKER** and CS-1 conducted at least three telephonic conversations to set up the distribution of cocaine base, a/k/a “crack”, at 524 East Tecumseh Street, Tulsa, Oklahoma.

123. On or about October 21, 2013, **KENYA WALKER** distributed 15.2 grams of cocaine base, a/k/a “crack”, to CS-1 in exchange for \$700 U.S. currency on the front porch of 520 East Tecumseh Street, Tulsa, Oklahoma.

124. On or about October 21, 2013, **AMOS** observed and provided security for **KENYA WALKER** during a drug transaction with CS-1 at 520 East Tecumseh Street, Tulsa, Oklahoma.

125. On or about November 25, 2013, **KENYA WALKER** and CS-1 conducted at least three telephonic conversations to set up the distribution of cocaine base, a/k/a “crack”, in Tulsa, Oklahoma.

126. On or about November 25, 2013, **KENYA WALKER** distributed approximately 13.7 grams to CS-1 in the 1000 block of North Osage Drive, Tulsa, Oklahoma in exchange for \$700 U. S. currency inside of his Chevrolet Impala, Oklahoma tag 359-HTH.

127. On or about November 25, 2013, **KENYA WALKER** travelled with drug proceeds to his destination of 1234 North Olympia Avenue, Tulsa, Oklahoma, in his Chevrolet Impala, Oklahoma tag 359-HTH.

128. On or about December 14, 2013, co-conspirator #47 possessed of marijuana and drug paraphernalia in the area of 8100 East Admiral Boulevard, Tulsa, Oklahoma while driving his 2002 Toyota Echo, Oklahoma tag 683-AKO.

129. On January 25, 2014, **STEWART** possessed cocaine base, a/k/a “crack”, and hid it under a cinder block at 509 East Tecumseh Street, Tulsa, Oklahoma.

130. From approximately sometime in 2012 to May 2014 co-conspirator #23 distributed multiple kilograms of cocaine in exchange for US currency to **DONALD WALTERS** at 2049 N. Woodrow, Tulsa, Oklahoma.

131. From approximately October 2013 to May 2014, **DONALD WALTERS** maintained fighting pit bulls at 2049 N. Woodrow, Tulsa, Oklahoma.

132. From approximately October 2013, to May 2014, co-conspirator #49 knowingly maintained a premises used for drug distribution at 2049 N. Woodrow, Tulsa, Oklahoma.

133. From approximately October 2013 to May 2014, **DONALD WALTERS** maintained a premises used for drug distribution at 2312 North Wheeling, Tulsa, Oklahoma.

134. From approximately October 2013 to March 2014, co-conspirator #23 delivered five kilograms of cocaine to **DONALD WALTERS** at Wheeling, Tulsa, Oklahoma.

135. In approximately the fall 2013, co-conspirator #23 delivered a kilogram of cocaine to **DONALD WALTERS** at the shop of **DONYALE STANCLE**, 1719 N. Oklahoma Street, Tulsa, Oklahoma, in exchange for approximately \$32,000.

136. In approximately the fall 2013, **DONYALE STANCLE** maintained a premises used for drug distribution, 1719 N. Oklahoma Street, Tulsa, OK.

137. From approximately September 2013 to October 2013, co-conspirator #23 went to **DONYALE STANCLE's** shop located 1719 N. Oklahoma Street, Tulsa, OK, and received drug proceeds from **DONALD WALTERS**.



138. From approximately October 2013 to May 2014, **DONALD WALTERS**, **MARIO WALTERS** discussed betting on dog fights (“couple racks per fight” - meaning \$1,000 of dollars) in the presence of co-conspirator #23.

139. From approximately October 2013 to May 2014, **DONALD WALTERS** and person #16 maintained a premises used for drug distribution, 11011 E. 27th Street S., Tulsa, OK.

140. In approximately the summer of 2014, **DON WALKER** introduced co-conspirator #23 to co-conspirator #43 for the purpose of obtaining marijuana and distributing it.

141. From approximately December 2013 to April 2014, co-conspirator #23 delivered in excess of 100 pounds of marijuana to co-conspirator #43.

142. In approximately winter 2014, co-conspirator #23 delivered one kilogram of cocaine to **STEWART** at 2301 W. Tecumseh Street, Tulsa, Oklahoma.

143. In approximately January 2014, co-conspirator #23 delivered two kilograms of cocaine to **CARWILE** at the direction of **DONALD WALTERS**.

144. In approximately January or February 2014, co-conspirator #23 delivered one kilogram of cocaine to **PURIFY** at 9124 E. 49th Street, Tulsa, OK.

145. In or about 2012, a previous cocaine supplier, introduced co-conspirator #23 as a source of supply for cocaine to **DONALD WALTERS** and **MARIO WALTERS**.

146. In or about 2013, **MARIO WALTERS** and **DONALD WALTERS** introduced co-conspirator #23 to **DON WALKER** as a source of supply for cocaine for **DONALD WALTERS**.

147. In or about 2013, **DON WALKER** introduced co-conspirator #23 to **LUCAS** as a source of supply for cocaine for **LUCAS**.

148. On December 14, 2013, **STEWART** and **KENYA WALKER** had a telephonic conversation regarding which co-conspirators were selling narcotics that night (“which girls are working tonight”) and how **STEWART** smokes marijuana and keeps his marijuana fresh (“keep it in the rotation”). (TT#1, #00291)

149. On December 15, 2013, **DONALD WALTERS** and **KENYA WALKER** had a telephonic conversation in which they discuss how they won’t feed their dogs before fighting so that the dogs will be more aggressive and they discuss **DONALD WALTERS** distributing narcotics to **KENYA WALKER**. (TT#1, #00383)

150. On December 15, 2013, **KENYA WALKER** and **NEWTON** had a telephonic conversation using codes regarding the distribution of cocaine base, a/k/a “crack”,. (“come on through”) (TT#1, #00399)

151. On December 15, 2013, **KENYA WALKER**, **DONALD WALTERS**, and a person known to the Grand Jury have a telephonic conversation to set up a dog fight between **KENYA WALKER**’s and **DONALD WALTERS**’ dogs for December 16, 2014 because **DONALD WALTERS** just fed his dog and wanted to wait a day (TT#1, #00406)

152. On December 15, 2013, **KENYA WALKER** and **NEWTON** had a telephonic conversation about distributing cocaine base, a/k/a “crack”, from the residence of co-conspirator #17, 1234 North Olympia Avenue, Tulsa, Oklahoma (“come to momma’s”). (TT#1, #00418)

153. On December 15, 2013, **KENYA WALKER** and **STEWART** had a telephonic conversation regarding their distribution of cocaine base, a/k/a “crack”, (“gonna make a run”). (TT#1, #00444)

154. On December 15, 2013, **KENYA WALKER** and co-conspirator #17 had a telephonic conversation regarding dog fighting and how co-conspirator #17 wants **KENYA WALKER** to win **DONALD WALTERS’** money (“if you take his money give me some of it”) (TT#1, #00453)

155. On December 16, 2013, **KENYA WALKER** and **DONALD WALTERS** had at least two telephonic conversations in which they discuss the details of their pending dog fight and **DONALD WALTERS** preparing to depart (“I’m cratin’ up, where you all at”). (TT#1, #00547 & #00551)

156. On December 16, 2013, **KENYA WALKER** and **STEWART** have a telephonic conversation in which they discuss going to the pending dog fight between **DONALD WALTERS** and **KENYA WALKER**. (TT#1, #00552)

157. On December 16, 2013, **KENYA WALKER**, **DONALD WALTERS**, person #18, person #19 and others unknown, travelled to 520 East Tecumseh Street, Tulsa, Oklahoma, and conducted a dog fight.

158. On December 17, 2013, **KENYA WALKER** and co-conspirator #48 had a telephonic conversation in which co-conspirator #48 advised **KENYA WALKER** he was going “to grab a girl” (a quantity of drugs) and travel to **KENYA WALKER** so **KENYA WALKER** can distribute cocaine base, a/k/a “crack”, to him. (TT#1, #00693)

159. On or about December 19, 2013, **KENYA WALKER** and CS-1 conducted at least seven telephonic conversations to set up the distribution of cocaine base, a/k/a “crack”, (“can I get a whole onion”) in Tulsa, Oklahoma. (TT#1 #01011, #01013, #01021, #01024, #01033, #01051, #01058)

160. On or about December 19, 2013, **KENYA WALKER** distributed 24.83 grams of cocaine base, a/k/a “crack”, to CS-1 near 1000 North Osage Drive, Tulsa, Oklahoma, from inside of his 2008 Dodge Charger, Oklahoma tag 473-KFG.

161. On or about December 19, 2013, **KENYA WALKER** travelled to and from 1234 North Olympia Avenue, Tulsa, Oklahoma to approximately 1000 North Osage Drive, Tulsa, Oklahoma in his 2008 Dodge Charger, Oklahoma tag 473-KFG to distribute cocaine base, a/k/a “crack”, to CS-1.

162. On December 19, 2013, **STEWART** contacted **KENYA WALKER** and had a telephonic conversation where **STEWART** reported he conducted counter-surveillance and observed a law enforcement vehicle on Tecumseh Street, Tulsa, Oklahoma. (TT#1, #01134)

163. On December 19, 2013, **STEWART** transported cocaine base, a/k/a “crack”, and eluded law enforcement action in Tulsa, Oklahoma. (TT#1, #01142)

164. On December 22, 2013, **STEWART** contacted **KENYA WALKER** and had a telephonic conversation where **STEWART** reported he conducted counter-surveillance and observed a law enforcement vehicle near co-conspirator #17's house and "to be careful." (TT#1, #01620)

165. On December 23, 2013, **KENYA WALKER** and **LAGRONE** had a telephonic conversation regarding the distribution of cocaine base, a/k/a "crack",. (TT#1, #01853)

166. On December 26, 2013, **KENYA WALKER** and **LAGRONE** had a telephonic conversation regarding the distribution of cocaine base, a/k/a "crack", ("what shoe size"). (TT#1, #02355)

167. On December 27, 2013, **KENYA WALKER** and **STEWART** had a telephonic conversation regarding the possibility that CS-4 was providing information to law enforcement regarding their drug trafficking activities, dog fighting training methods in cold weather ("if you walk 'em, get to know 'em, get 'em by your side, then he'll fight harder for you") and that **STEWART** has been fighting dogs since 1995. (TT#1, #02503)

168. On December 28, 2013, **KENYA WALKER** and co-conspirator #48 had a telephonic conversation regarding the distribution of cocaine base, a/k/a "crack". (TT#1, #02671)

169. On December 28, 2013, **KENYA WALKER** and **LAGRONE** had two telephonic conversations regarding the distribution of cocaine base, a/k/a "crack", (TT#1, #02642, #02643)

170. On December 28, 2013, **KENYA WALKER** distributed approximately 12.51 grams of cocaine base, a/k/a "crack", to **LAGRONE** from 1214 North Santa Fe, Tulsa, Oklahoma.

171. On December 28, 2013, **LAGRONE** attempted to elude law enforcement and dispose of cocaine base, a/k/a "crack", in an attempt to prevent law enforcement action on his drug distribution activities.

172. On December 28, 2013, **LAGRONE** transported and agreed to distribute a quantity of cocaine base, a/k/a "crack", in his 2002 Chevrolet Malibu, Oklahoma tag 836-ZYM, to an unknown individual driving a GMC four door truck at the Pick and Pay food store, Tulsa, Oklahoma.

173. On December 30, 2013, **KENYA WALKER** and **NEWTON** had a series of telephonic conversations regarding the distribution of cocaine base, a/k/a "crack", (TT#1, #03057, #03087, #03088, #03089, #03096, #03097, #03122, #03130)

174. On December 30, 2013, **KENYA WALKER** distributed at least 2.28 grams of cocaine base to **NEWTON** at 1234 North Olympia Avenue, Tulsa, Oklahoma.

175. On December 30, 2013, **NEWTON** possessed, transported and distributed at least 2.28 grams of cocaine base, a/k/a "crack", to co-conspirator #21 Larry Thomas in a 2002 Chevrolet Suburban, Oklahoma tag 019-DEB.

176. On December 31, 2014, **NEWTON** and **KENYA WALKER** conducted a telephonic conversation in which **NEWTON** warned **KENYA WALKER** of police activity and described police vehicles he had observed in the area where **KENYA WALKER** was distributing narcotics. (TT#1, #03200)

177. On January 1, 2014, **KENYA WALKER** and **MICHAEL WASHINGTON** discussed **MICHAEL WASHINGTON** getting out of prison approximately three weeks prior and **KENYA WALKER** agrees to distribute/supply cocaine base, a/k/a "crack", to **MICHAEL WASHINGTON**. (TT#1, #03351)

178. On January 2, 2104, **NEWTON** and **KENYA WALKER** conducted a telephonic conversation in which **NEWTON** warned **KENYA WALKER** of police activity in the area where **KENYA WALKER** was distributing narcotics and **NEWTON** advised **KENYA WALKER** to "be careful." (TT#1, #03597)

179. On January 3, 2014, **KENYA WALKER** and **NEWTON** conducted three telephonic conversations in which **KENYA WALKER** agreed to distribute a quantity of cocaine base, a/k/a "crack", to **NEWTON** twice and actually conducted said transaction. (TT#1, #03642, #03651, #03793)

180. On January 6, 2014, **KENYA WALKER** and **NEWTON** conducted a telephonic conversation in which **KENYA WALKER** agreed to distribute a quantity of cocaine base, a/k/a "crack", to **NEWTON**. (TT#1, #04256)

181. On January 6, 2014, **KENYA WALKER** distributed a quantity of cocaine base, a/k/a "crack", to **NEWTON** from 1214 North Santa Fe Avenue, Tulsa, Oklahoma.

182. On January 6, 2014, **NEWTON** transported a quantity of cocaine base, a/k/a “crack”, in a plastic baggy and \$200 U.S. currency in his 1998 Nissan Quest, Oklahoma tag 061-BEW.

183. On January 6, 2014, **NEWTON** destroyed evidence when he swallowed cocaine base, a/k/a “crack”, in order to prevent law enforcement discovery of evidence.

184. On January 9, 2014, **KENYA WALKER** and **LAGRONE** conducted a telephonic conversation in which **KENYA WALKER** agreed to distribute cocaine base, a/k/a “crack”, to **LAGRONE**. (TT#1, #04781)

185. On January 9, 2014, **KENYA WALKER** and **LAGRONE** conducted a telephonic conversation in which **LAGRONE** informed **KENYA WALKER** about police activity in the area of **KENYA WALKER**'s drug activities and **KENYA WALKER** inquired about **LAGRONE**'s pending drug case. (TT#1, #04811)

186. On January 12, 2014, **KENYA WALKER** and co-conspirator #22 conducted a telephonic conversation in which they discussed dog fighting. **KENYA WALKER** asked co-conspirator #22 if they could fight dogs (“dog show”) “tomorrow” if he didn't feed his. Co-conspirator #22 agreed to load the dogs up and get **KENYA WALKER**. (TT#1, #05239)

187. On January 12, 2014, **KENYA WALKER** and **STEWART** conducted two telephonic conversations in which **KENYA WALKER** invited **STEWART** to co-conspirator #22's residence where they were about to fight dogs and where **KENYA WALKER** would fight his dog. (TT#1, #05259)



188. On January 12, 2014, **STEWART** drove to 621 East Zion Street, Tulsa, Oklahoma to participate in dog fighting activities where proceeds would be used to fund the fight.

189. On January 12, 2014, co-conspirator #22 drove to 1234 North Olympia Street, Tulsa, Oklahoma to pick up **KENYA WALKER** and take him to 621 East Zion Street, Tulsa, Oklahoma, to conduct dog fighting operations.

190. On January 12, 2014, **KENYA WALKER** and co-conspirator #22 conducted a telephonic conversation in which co-conspirator #22 offered to train and prepare **KENYA WALKER's** dog's for fighting and discussed the dog fighting that took place earlier in the day ("that dog had heart"). (TT#1, #05281)

191. On January 12, 2014, **KENYA WALKER** and **MARZETT** conducted a telephonic conversation in regarding distribution.

192. On January 16, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic conversation in which they discussed gambling and distribution of narcotics. (TT#2, #00104)

193. On January 17, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a series of telephonic conversations in which they discussed **CARWILE** bringing **DONALD WALTERS** narcotics ("a little of that"). **DONALD WALTERS** said he wanted four. (TT#2, #00169, #00205, #00208, #00218, #00235, #00251, #00260, #00264, #00265)

194. On January 17, 2014, **DONALD WALTERS** and **SMITH** knowingly participated in a telephonic conversation in which **SMITH** described two vehicles that he believed were undercover police vehicles to **DONALD WALTERS**. (TT#2, #00170)

195. On January 18, 2014, **DONALD WALTERS**, **DONYALE STANCLE**, **DEMARCUS JOHNSON** and co-conspirator #28 travelled to Oklahoma City.

196. On January 18, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in telephonic conversations in which co-conspirator #23 is tried to distribute cocaine to **DONALD WALTERS** and would “give it to the other guy” if **DONALD WALTERS** does not respond. (TT#2, #00372, #00382)

197. On January 17, 2014, **DONYALE STANCLE** and **JOHN WASHINGTON** knowingly participated in a telephonic conversation in which **DONYALE STANCLE** discussed utilizing phones for short periods (“go phone”) and with out-of-town area codes like **DONALD WALTERS** and co-conspirator #28 in order to avoid law enforcement detection. (TT#3, #00105)

198. On January 18, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a coded telephonic conversation in which **DONYALE STANCLE** agreed to distribute an amount of cocaine base, a/k/a “crack”, (“two and a fuse”) to **STEWART** and told him to come by (“pull up on me”). (TT#3, #00450)

199. On January 18, 2014, **DONYALE STANCLE** distributed an amount of cocaine base, a/k/a “crack”, to **STEWART** from 1719 East Oklahoma Street, Tulsa, Oklahoma.

200. On January 18, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which **MARIO WALTERS** informed **DONALD WALTERS** that co-conspirator #24 was arrested on a drug trafficking charge. (TT#2, #00472)

201. On January 18, 2014, **DONALD WALTERS** and **DONYALE STANCLE** he knowingly participated in a telephonic conversation in which **DONYALE STANCLE** said a car around Carl Cooper's house, he described the truck as an undercover police truck and how those Special Investigations guys "don't want no one to see their faces". (TT#2, #00474)

202. On January 18, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in a telephonic conversation in which they discussed the distribution of cocaine at his Wheeling address. (TT#2, #00477)

203. On January 18, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** spotted a surveillance vehicle and called **DONYALE STANCLE** to report it. **DONYALE STANCLE** said "they" know **DONALD WALTERS'** car and he didn't need to be in it any more. (TT#2, #00484)

204. On January 18, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in telephonic conversations in which **DONALD WALTERS** directed **DELOUISER** where to meet to distribute cocaine. (TT#2, #00485, #00486)

205. On January 18, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which they discussed the surveillance vehicles they had seen earlier and what it was about. **DONYALE STANCLE** said he was at the shop with **JAMAR STEWART** and **DONALD WALTERS** was going to “pull up on you.” (TT#2, #00535)

206. On January 18, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which **DONALD WALTERS** informed **RODNEY PARKER** of the police activity he had seen and they had been at **SMITH’s** shop too. They discussed co-conspirator #24. They discussed **JAMAR STEWART** dealing drugs. They thought police had a surveillance camera at **DONYALE STANCLE’s** shop. (TT#2, #00572)

207. On January 18, 2014, **DONYALE STANCLE** and **KENYA WALKER** knowingly participated in a coded telephonic conversation in which **DONYALE STANCLE** agreed to distribute drugs to **KENYA WALKER** at **DONYALE STANCLE’s** residence of 1719 East Oklahoma Street, Tulsa, Oklahoma (“Getting ready to roll up on you”). (TT#3, #00489)

208. On January 19, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed the quality of marijuana, **DONALD WALTERS** is about to go get cocaine (“that sherbet”) and “pull up” on **MARZETT**. (TT#2, #00626)

209. On January 20, 2014, **KENYA WALKER** and **STEWART** knowingly participated in a telephonic conversation in which they discussed law enforcement surveillance at the Martin Luther King parade. They argued about who would drive **KENYA WALKER's** Oldsmobile Cutlass 442, Oklahoma tag 747-EUN, because **KENYA WALKER** did not want to drive with police around (“I know when to ride and know when to drive”) (TT#1, #06399)

210. On January 20, 2014, **COOPER** contacted **DONYALE STANCLE** and they knowingly participated in a telephonic conversation in which **COOPER** informed **DONYALE STANCLE** of a law enforcement vehicle located near **DONYALE STANCLE's** residence at 1719 East Oklahoma Street, Tulsa, Oklahoma. (TT#3, #00885)

211. On January 20, 2014, **DONYALE STANCLE** knowingly participated in multiple telephonic conversations regarding police activity and observations in and around his residence at 1719 East Oklahoma Street, Tulsa, Oklahoma. (TT#3, #00892, #00899, #00905)

212. On January 20, 2014, **DONYALE STANCLE** and **SMITH** knowingly participated in a telephonic conversation where **SMITH** informed **DONYALE STANCLE** of police activity at the Martin Luther King Day parade and his identification of a specific police officer he observed (“like the little Hoover Crips gang say, that’s the police that be fuckin’ with Lil D”). (TT#3, #00930)

213. On January 20, 2014, **DONALD WALTERS** and **SMITH** knowingly participated in a telephonic conversation in which **SMITH** reported to **DONALD**

**WALTERS** that he observed law enforcement and the actions he observed along with descriptions of the officer. **MARIO WALTERS** told him they were “fucking with” **DONALD WALTERS**. (Marvin was driving Donald’s car in the MLK parade and saw Larkin texting as he drove by)(“pull up”).(TT#2, #00729)

214. On January 20, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a series of telephonic communications in which they discussed a pending drug distribution. Co-conspirator #23 had to check if co-conspirator #38 had a kilogram of cocaine (that ticket). **DONALD WALTERS** told co-conspirator #23 “I heard your boy got popped”. (Co-conspirator #24 busted on 1/17, TRACIS 2014-003528) – shows interdependence/knowledge of one another’s drug activities (TT#2, #00740, #00741, 300742)

215. On January 20, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic communication in which **DONALD WALTERS** ordered **JOHN WASHINGTON** to get him marijuana. **JOHN WASHINGTON** agreed and advised his marijuana supplier did not get off work until 4:30pm and he would call **DONALD WALTERS** back. (TT#2, #00748)

216. On January 20, 2014, **DONALD WALTERS** and **SMITH** knowingly participated in a telephonic communication in which **SMITH** identified the police officer from the MLK parade as “Stix” and said he was taking pictures of **KENYA WALKER** and “everyone else.” **DONALD WALTERS** said they were updating everybody’s

pictures. **SMITH** commented that they did not need to worry about that car (Donald's orange Cutlass) because a person owned that motherfucker (car)." (TT#2, #00756)

217. On January 20, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic communication in which the unidentified male asked **DONALD WALTERS** to "put me in the game. Let me get in there and make some bread." (supply me with drugs). (TT#2, #00758)

218. On January 20, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed that **JAMAR STEWART** and **KENYA WALKER** were at MLK parade. **JOHN WASHINGTON** grabbed some codeine and **DONALD WALTERS** told **RODNEY PARKER** he was ready to go to California. (TT#2, #00815)

219. On January 21, 2014, **DONALD WALTERS** and co-conspirator #26 knowingly participated in a series of telephonic communications in which co-conspirator #26 put **DONALD WALTERS** in contact with his marijuana supplier who was in OKC. They discussed the amounts and prices. (TT#2, #00977, #01024)

220. On January 21, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which **DONYALE STANCLE** asked **DONALD WALTERS** for drug proceeds for "his little buddy." **DONALD WALTERS** said "there are too many people playing and every time he deals through **DONYALE STANCLE**, someone is skimming off the top." (TT#2, #00997)

221. On January 21, 2014, **KENYA WALKER** and co-conspirator #17 knowingly participated in a telephonic conversation in which they discussed where co-conspirator #17 hid **KENYA WALKER**'s drug proceeds within the residence of 1234 North Olympia Avenue, Tulsa, Oklahoma. (TT#1, #06539)

222. On January 21, 2014, **KENYA WALKER** and **STEWART** knowingly participated in a telephonic conversation in which **STEWART** advised **KENYA WALKER** to put his fighting dog out in the yard before he come over to shoot the dog. **STEWART** advised **KENYA WALKER** he won \$600 from co-conspirator #28 while gambling with drug proceeds at **DONYALE STANCLE**'s shop and he lost \$500 back to **DONYALE STANCLE** before the night was over. (TT#1, #06611)

223. On January 21, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed the distribution of narcotics ("run into you"). (TT#2, #00921)

224. On January 22, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed the distribution of drugs. **DONALD WALTERS** said he was "pulling up" on **MARZETT**. (TT#2, #01169)

225. On January 22, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic communication in which **DONALD WALTERS** directed **JOHN WASHINGTON** to get "something for the head" (drugs). **DONALD WALTERS** said P Rock (**DARON HARRIS**) was at work



and asked **JOHN WASHINGTON** to see if “Chuck” (**DON WALKER**, aka “Chucky”) had something. (TT#2, #01141)

226. On January 22, 2014, **DONALD WALTERS** and **DARON HARRIS** knowingly participated in a telephonic communication in which **DARON HARRIS** asked if **DONALD WALTERS** had “things lined out” yet (marijuana). **DONALD WALTERS** said no and they agreed to meet at **SMITH’s** shop. (TT#2, #01167)

227. On January 23, 2014, **DONALD WALTERS** and **DARON HARRIS** knowingly participated in a telephonic communication in which **DARON HARRIS** reported to **DONALD WALTERS** that he just got pulled over and he would not let them search his vehicle. **DONALD WALTERS** wanted car description and location. **DARON HARRIS** asked who was the other police officer they talked about...**DONALD WALTERS** replied with the cauliflower-eared motherfucker (TPD Officer Josh Dupler). (TT#2, #01205)

228. On January 23, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed **LORELL BATTLE** and others they were worried about in jail. They also discussed money and upcoming court for **JAMAR STEWART** and **DONYALE STANCLE**. (TT#2, #01522)

229. On January 23, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which they tried to determine if

**DARON HARRIS'** stop was task force or regular traffic stop and whether he was followed or not. (TT#2, #01531)

230. On January 23, 2014, **DONALD WALTERS** and **SMITH** knowingly participated in a telephonic communication in which they said they thought about it all night and determined that the traffic stop on **DARON HARRIS** probably was unrelated to **SMITH's** shop. (TT#2, #01133)

231. On January 23, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed **DARON HARRIS'** traffic stop and determined it must be unrelated (we purposely allowed this vehicle to travel a long distance before stopping it). (TT#2, #01560)

232. On January 23, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed the distribution of narcotics. **MARZETT** wanted **DONALD WALTERS** to "pull up on him" (supply him drugs). (TT#2, #01582)

233. On January 23, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic communication in which they talked about negotiating a better deal. They discussed their concern for **KENYA WALKER** because he had only been to jail once. (TT#3, #01460)

234. On January 23, 2014, **DONYALE STANCLE** and **JOHN WASHINGTON** knowingly participated in a telephonic conversation in which they discussed law enforcement activity, ways to thwart law enforcement investigation and

how certain persons, like **DONALD WALTERS**, bring law enforcement attention (“heat”) on the group (co-conspirators). (TT#3, #01433)

235. On January 24, 2014, **DONYALE STANCLE** and **DEMARCUS JOHNSON** knowingly participated in a telephonic conversation in which they discussed **DONYALE STANCLE** obtaining and distributing drugs to **DEMARCUS JOHNSON**. (TT#3, #01595)

236. On January 24, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in a telephonic communication in which they discussed the distribution of drugs. (TT#2, #01729)

237. On January 24, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic communication in which the unidentified male asked for drugs (“blow”) and **DONALD WALTERS** told him to call “P Rock” (**DARON HARRIS**) and they discussed **DARON HARRIS**’ prices were “high” and they agreed to meet later. (TT#2, #01733)

238. On January 24, 2014, **DONALD WALTERS** and **DEMARCUS JOHNSON** knowingly participated in a telephonic communication in which **DONALD WALTERS** told **DEMARCUS JOHNSON** to meet him at the grocery store and **DEMARCUS JOHNSON** said the same place “we met last time” (for a transaction). (TT#2, #01760)

239. On January 24, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a series of telephonic communications in

which **JOHN WASHINGTON** was “about to bump into somebody” and asked if **DONALD WALTERS** wanted anything. **DONALD WALTERS** told **JOHN WASHINGTON** to get some for him as well. **DONALD WALTERS** then told **JOHN WASHINGTON** he would “bump into him.” (TT#2, #01826, #01841)

240. On January 24 - 25, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a telephonic communication in which **DONALD WALTERS** told **TINSLEY** he might have to push back a pending drug transaction because he was waiting on police to leave the area. Next morning, **DONALD WALTERS** “pulled up” on unidentified male. (TT#2, #01870, #01889)

241. On January 25, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a telephonic communication in which **DONALD WALTERS** asked **COLBERT** if he knew anyone who “had some hard” (crack cocaine). **COLBERT** said let me call my homies and find out. **DONALD WALTERS** called back to check on status. **COLBERT** returned the call advising he has the narcotics on the way. **DONALD WALTERS** asked if **COLBERT** could just come and get the money where they smoked earlier. (TT#2, #01957, #01971, #01972, #01974, #01975, #01980)

242. On January 25, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed that they were worried about a person talking to police because that person just got arrested on trafficking charge, they discussed P Rock (**DARON HARRIS**) talking too much about being followed from **SMITH**’s shop. **DONALD WALTERS** indicated he had a friend

whose girlfriend worked at the casino and saw that names had been acquired about.  
(TT#2, #01997)

243. On January 25, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed gambling and collecting gambling debts. They discussed people getting in trouble and **RODNEY PARKER** told **DONALD WALTERS** to tell them to “hold tight” for a little bit. (TT#2, #02069)

244. On January 25, 2014, **DONYALE STANCLE** and **JOHN WASHINGTON** knowingly participated in a coded telephonic conversation in which they agreed that **DONYALE STANCLE** would distribute narcotics to **JOHN WASHINGTON** (“pull up on me”). (TT#3, #01800)

245. On January 25, 2014, **DONYALE STANCLE** and **DEMARCUS JOHNSON** knowingly participated in a coded telephonic conversation in which **DONYALE STANCLE** agreed to distribute narcotics to **DEMARCUS JOHNSON** at Soul Brothers Car Wash, 3300 North Peoria Avenue, Tulsa, Oklahoma. (TT#3, #01808)

246. On January 26, 2014, **DONYALE STANCLE** and co-conspirator #28 knowingly participated in a coded telephonic conversation in which **DONYALE STANCLE** agreed to distribute narcotics to co-conspirator #28 (“get one of them things from you...pull up on you”). (TT#3, #02070)

247. On January 26, 2014, co-conspirator #28 called **DONYALE STANCLE** and knowingly participated in a telephonic conversation in which co-conspirator #28 told

**DONYALE STANCLE** he was just stopped by law enforcement and co-conspirator #28 described two different police vehicles to **DONYALE STANCLE**. They discussed law enforcement attention in the area, law enforcement tactics, and vehicle descriptions. (TPD FI, TT#3, #02080)

248. On January 26, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which **DONALD WALTERS** and **MARZETT** discussed the distribution of narcotics. (TT#2, #02171)

249. On January 26, 2014, **DONALD WALTERS** and **DARON HARRIS** knowingly participated in a series of telephonic communications in which they were going to “meet up” (distribute narcotics). **DARON HARRIS** referred to **DONALD WALTERS** as the “boss.” They discussed meeting at an abandoned house. (TT#2, #02170)

250. On January 26, 2014, **DONALD WALTERS** and **DEMARCUS JOHNSON** knowingly participated in a series of telephonic communications in which **DEMARCUS JOHNSON** informed **DONALD WALTERS** he was “tryin to get on” (get in the drug game with an unknown supplier). **DEMARCUS JOHNSON** was brokering a deal for himself and **DONALD WALTERS**. (TT#2, #02192, #02194, #02198, #02200-02204, #02209-02212)

251. On January 27, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed people in prison, including **PEARSON**. (TT#2, #02281)

252. On January 27, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a series of telephonic communications in which they agreed to meet to distribute narcotics. **DONALD WALTERS** noticed a car following (it was surveillance) and called the deal off. (TT#2, #02307, #02316, #02318)

253. On January 27, 2014, **DONALD WALTERS** and unidentified individual, aka "Terrell", knowingly participated in a telephonic communication in which **DONALD WALTERS** told "Terrell" to "move the female dog. She got puppies...throw them motherfuckers away." (TT#2, #02331)

254. On January 27, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic communication in which **MARIO WALTERS** told **DONALD WALTERS** he was out of jail and person #27 was coming to pick him up. (TT#2, #02350)

255. On January 27, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic communication in which **DONALD WALTERS** and **JOHN WASHINGTON** obtain drugs for him. **JOHN WASHINGTON** told **DONALD WALTERS** he would go see "Chucky" (**DON WALKER**). Later, **JOHN WASHINGTON** called back to tell him he got it and was bringing it to **DONALD WALTERS**. (TT#2, #02378, #02392)

256. On January 28, 2014, **DONALD WALTERS** and co-conspirator #26 knowingly participated in a telephonic communication in which they discussed the prices for narcotics and co-conspirator #26 had a load on the road (TT#2, #02500)

257. On January 28, 2014, **DONALD WALTERS** and knowingly participated in a telephonic communication in which he discussed drug related information. (TT#2, #02500)

258. On January 28, 2014, **DONALD WALTERS** and **DEMONN PARKER** knowingly participated in a telephonic communication in which they discussed marijuana distribution, the different kinds of marijuana and that **RODNEY PARKER** was telling everyone to hold tight. **DONALD WALTERS** says the “well is running dry.” (meaning the supply of drugs was low) (TT#2, #02512)

259. On January 28, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic communication in which **DONALD WALTERS** ordered **JOHN WASHINGTON** to get him drugs. (“grab me a 7”) (a quantity of cocaine) (TT#2, #02534)

260. On January 28, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed **MARZETT**'s case and prison time along with marijuana distribution. (TT#2, #02553)

261. On January 28, 2014, **DONALD WALTERS** and **DEMARCUS JOHNSON** knowingly participated in a telephonic communication in which they discussed a previous distribution of crack cocaine. **DEMARCUS JOHNSON** told **DONALD WALTERS** the drugs he bought were “a little off.” It was 58 grams (instead of the normal 63). **DONALD WALTERS** agreed to make it right. They also discussed



co-conspirator #28's traffic stop leaving **DONYALE STANCLE's** shop. (TT#2, #02569)

262. On January 29, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic communication in which **DONALD WALTERS** wanted to pick up drugs from **MARIO WALTERS**. **MARIO WALTERS** told **DONALD WALTERS** "its behind the trash can outside" (TT#2, #02782)

263. On January 30, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which **RODNEY PARKER** told **DONALD WALTERS** "I might have a little bit for you" (drugs); discussed people giving information. **DONALD WALTERS** talked about the car that he saw following him and **DONYALE STANCLE** told him he had seen those cars at his place before. **DONALD WALTERS** says he is sick of the "indictment" talk. (TT#2, #02854)

264. On January 30, 2014, **DONALD WALTERS** and **DARON HARRIS** knowingly participated in a telephonic communication in which **DARON HARRIS** agreed to distribute narcotics to **DONALD WALTERS** ("a little seven") (a quantity of cocaine). (TT#2, #02871)

265. On January 30, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which **DONYALE STANCLE** reported to **DONALD WALTERS** that "Four Trey" (Deandre Starks) told that they are on "the list" (a list of targets in the Federal Grand Jury). **DONYALE STANCLE** asked **DONALD WALTERS** if he "fucks with him" (supplies drugs). **DONALD WALTERS**

called him "Lil Deandre." They discussed co-conspirator #29 traffic stop leaving **DONYALE STANCLE's** shop. **DONYALE STANCLE** told **DONALD WALTERS** that co-conspirator #29 had to swallow his marijuana during the stop (to avoid police finding it). (TT#2, #02895)

266. On January 30, 2014, **DONYALE STANCLE** and co-conspirator #29 knowingly participated in a telephonic conversation in which they discussed co-conspirator #29's traffic stop, officers involved and law enforcement tactics. (TPD FI; TT#3, #02745)

267. On January 30, 2014, **DONYALE STANCLE** and co-conspirator #29 knowingly participated in a telephonic conversation in which they discussed an "indictment list" and how **DONALD WALTERS, LORELL BATTLE,** and **MARZETT** are on it. They discussed if a list would be released before the indictments. They discussed how co-conspirator #29 saw police and kept driving after they turned their lights on so he could destroy drug evidence ("I have some little shit on me so I swallow that shit"). They also discussed the details of the law enforcement vehicles and officers involved. (TT#3, #02779)

268. On January 31, 2014, **DONALD WALTERS** and **MARZETT** (in jail) knowingly participated in a telephonic conversation in which they discussed marijuana, codeine and conversations about how everyone in jail is talking about **DONALD WALTERS** "being a movie star." (TT#2, #03086)

269. On February 1, 2014, **DONALD WALTERS** and **KENYA WALKER** knowingly participated in a telephonic communication in which **DONALD WALTERS** told **KENYA WALKER** “one my partners has a little .45 (.45 caliber handgun) he wants to get rid of.” They agreed to look over the gun tomorrow. (TT#2, #03185)

270. On February 1, 2014, **DONALD WALTERS** knowingly possessed a firearm.

271. On February 1, 2014, **DONALD WALTERS** and **STEWART** knowingly participated in a telephonic communication in which **STEWART** asked for “help” (drugs to sell). (TT#2, #03263)

272. On February 1, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which they discussed suspicions on people being arrested. **DONALD WALTERS** told **DONYALE STANCLE** he talked to “Four Trey” (Deandre Starks) but it didn’t go anywhere. **DONYALE STANCLE** told **DONALD WALTERS** that **STEWART** called him for help because he lost all his money at the casino. (TT#2, #03272)

273. On February 1, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic conversation in which they discussed how person #30 got paperwork and he was looking for person #31 to retaliate on him because person #30 thought person #31 was a snitch. **STEWART** stated, “We were all in the same game...but now...” **STEWART** explained what he would do to someone if they snitched on him. “I sure hope it don’t happen to me and I can get back out.” **DONYALE**

**STANCLE** said “a motherfucker dead if he do you like that.” “For entertainment purposes only...In my last every breath I got and every crime dime I got...may God bless you. They also discussed potential snitches including “Four Trey”, “Baby D”, “Sleepy” and “Boo” along with an indictment list. (TT#3, #03170)

274. On February 2, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which **DONALD WALTERS** told **RODNEY PARKER** his Toyota Avalon needed some work. They discussed the previous car stop with co-conspirator #32. (TT#2, #03407)

275. On February 2, 2014, **DONALD WALTERS** and **MYRON MARZETT** knowingly participated in a telephonic conversation in which they discussed the distribution of narcotics (“pull up”). (TT#2, #03554)

276. On February 2, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a telephonic communication in which **COLBERT** told **DONALD WALTERS** he dropped off drug proceeds at the house. **COLBERT** told **DONALD WALTERS** the codeine and the “shit” (drugs) would be here tomorrow. Once **COLBERT** got the codeine he called **DONALD WALTERS** to tell him “it’s on cuz” and **DONALD WALTERS** ordered “six” (a quantity of drugs). (TT#2, #03629, #03682)

277. On February 3, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which **RODNEY PARKER** agreed to distribute marijuana to **DONALD WALTERS** and **DONALD WALTERS** said he would “pull up on him.” **DONALD WALTERS** asked where **RODNEY**

**PARKER** was and **RODNEY PARKER** said “Sooner headquarters” (**DEMONN PARKER’s** house). (TT#2, #03778, #03808)

278. On February 3, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a telephonic communication in which **DONALD WALTERS** told **TINSLEY** he was “at the gate” so he could get drugs from **TINSLEY**. (TT#2, #03811)

279. On February 3, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which **RODNEY PARKER** indicated he had observed **STEWART** involved in a traffic stop and reported it to **DONALD WALTERS**. They talked about the police vehicles that were involved. They named the officers involved in the stop (Adair). **RODNEY PARKER** discussed how they needed to know they were under surveillance and they needed to play “smart”. (TT#2, #03844)

280. On February 3, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which the discussed the potential of “3 Staccs” (person #33) being a snitch. They discussed **STEWART** not “playing the game” by not dressing right for court and stuff. They discussed **RODNEY PARKER** being back in town and how he owed **DONYALE STANCLE** money, but **DONYALE STANCLE** would just collect money from **DONALD WALTERS**. (TT#2, #03845)

281. On February 4, 2014, **DONALD WALTERS** and **KENYA WALKER** knowingly participated in a telephonic communication in which they agreed to meet to

distribute drugs. **DONALD WALTERS** called **KENYA WALKER** and told him it would be a minute because the “trucks in the area don’t look right.” (there maybe surveillance) (TT#2, #03956, #03968, #03969, #03998)

282. On February 4, 2014, **DONALD WALTERS** and **DEMONN PARKER** knowingly participated in a telephonic communication in which they agreed to meet to distribute drugs (“run into you.”) (TT#2, #03973, #03976)

283. On February 4, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they agreed **RODNEY PARKER** would bring **DONALD WALTERS** drugs at his house. (TT#2, #04048)

284. On February 4, 2014, **DONALD WALTERS** and an unknown female using **MARZETT**’s telephone knowingly participated in a telephonic conversation in which **DONALD WALTERS** tried to “pull up” on her but the “laws sittin’ over here” so give me a minute. (TT#2, #03999)

285. On February 5, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which the “police scared the life out of me last night”. **RODNEY PARKER** discussed seeing the police the night of February 4, 2014 (Helton). **RODNEY PARKER** explained that (“they” “ain’t getting” pulled over for driver’s license. That’s not what it is all about.) (TT#2, #04095)

286. On February 6, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed drug

distribution and what they needed to do to make money. They discussed their gambling bets, **DONYALE STANCLE** and **STEWART**. (TT#2, #04304)

287. On February 7, 2014, **DONALD WALTERS** and co-conspirator #49 knowingly participated in a telephonic communication in which co-conspirator #49 needed money and called **DONALD WALTERS**. **DONALD WALTERS** told co-conspirator #49 that there was money in the closet. (TT#2, #04546)

288. On February 7, 2014, **DONYALE STANCLE** and another person knowingly participated in a telephonic conversation in which they discussed gambling and how prescription pills were becoming more valuable than drugs and how **CARL COOPER** made \$2200/month selling his pills. They talked about selling prescriptions and how they were more addictive than “crack”. (TT#3, #04152)

289. On February 8, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed plans of doing something new. **RODNEY PARKER** said **DONALD WALTERS**’s would “smoke my shit up” like he always did. (TT#2, #04637)

290. On February 8, 2014, **DONALD WALTERS** and co-conspirator #28 knowingly participated in a telephonic communication in which co-conspirator #28 reported he was trying to “put something together.” Co-conspirator #28 said “I’m starving and I need to eat.” (I’m broke and need drugs). **DONALD WALTERS** agreed by telling him to “hit me up when you get back.” (TT#2, #04764)

291. On February 9, 2014, **DONALD WALTERS** and **DEMARCUS JOHNSON** knowingly participated in a telephonic communication in which **DEMARCUS JOHNSON** debriefed **DONALD WALTERS** on his recent traffic stop. **DONALD WALTERS** said he “needed to chop it up with you” meaning talk face to face, because **WALTERS** was afraid his phone was tapped). (TT#2, #04905, #04915, #04922)

292. On February 9, 2014, **DONYALE STANCLE** and unknown male believed to be person #34 knowingly participated in three telephonic conversations in which person #34 called **DONYALE STANCLE** to report **DEMARCUS JOHNSON** just got stopped by police leaving **DONYALE STANCLE**’s shop. Person #34 told **DEMARCUS JOHNSON** he needed to start changing his routes. They discussed “riding dirty”, carrying or transporting drugs. (TT#3, #04378, #04381, #04396)

293. On February 9, 2014, **DEMARCUS JOHNSON** possessed with the intent to distribute approximately 2.5 grams of cocaine base, a/k/a “crack”, while driving his 2009 Chevrolet Impala, VIN 2G1WT57N19156140 near the 4400 block of East I-244 after leaving **DONYALE STANCLE**’s shop at 1719 E. Oklahoma Street, Tulsa, OK.

294. On February 9, 2014, **DEMARCUS JOHNSON** traffic stop obtained drugs from **DONALD WALTERS** and **DONYALE STANCLE**.

295. On February 9, 2014, **DONYALE STANCLE** contacted the Tulsa County Jail to check on the status and charges of **DEMARCUS JOHNSON**. (TT#3, #04395)



296. On February 9, 2014, **DONYALE STANCLE** and **DEMARCUS JOHNSON** knowingly participated in a telephonic conversation in which they discussed the details of **DEMARCUS JOHNSON**'s traffic stop and what **DEMARCUS JOHNSON** learned from police. (TT#3, #04441)

297. On February 9, 2014, **DEMARCUS JOHNSON** advised **DONYALE STANCLE** of information he gained during a meeting with law enforcement regarding his potential cooperation. (TT#3, #04441)

298. On February 9, 2014, **DONYALE STANCLE** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which they discussed the details of **DEMARCUS JOHNSON**'s traffic stop, police interview tactics, and how they thought police were making a case on **DEMARCUS JOHNSON** and **KENYA WALKER**. They also discussed who else might be cooperating with law enforcement. (TT#4, #00082)

299. On February 9, 2014, **DONYALE STANCLE** and **RODNEY PARKER** knowingly participated in a series of telephonic conversations regarding **DEMARCUS JOHNSON**'s traffic stop, how they believed he may be "snitching" and **RODNEY PARKER** told **DONYALE STANCLE** he "needs to be careful...you feel me." Discussions included police activity and observances around **KENYA WALKER**, **STEWART**, **DEMONN PARKER**, **DONYALE STANCLE** and **RODNEY PARKER**. (TT#3, #04446, #04450, #04454)

300. On February 10, 2014, **DONYALE STANCLE** and co-conspirator #28 knowingly participated in a telephonic conversation in which they rehashed the **DEMARCUS JOHNSON** car stop, whether he was being truthful to them or whether he was a “snitch”. **DONYALE STANCLE** warns co-conspirator #28 that there was “some strange shit going on.” They discussed **DEMONN PARKER**’s pending court case, and undercover police activity. (TT#3, #04464)

301. On February 10, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed **DEMARCUS JOHNSON**’s car stop, **KENYA WALKER**, and who might be snitching and the investigation. (TT#2, #04999)

302. On February 10, 2014, **DONALD WALTERS** and co-conspirator #28 knowingly participated in a telephonic communication in which they discussed meeting the next day “holler at me.” (TT#2, #05056)

303. On February 10, 2014, **DONYALE STANCLE** and an unknown male knowingly participated in a telephonic conversation in which they discussed **DEMARCUS JOHNSON**’s car stop, how **DEMARCUS JOHNSON** could be trusted and how he was probably wearing a wire. They also discussed how **KENYA WALKER** was possibly snitching. (TT#4, #00083)

304. On February 10, 2014, **DONYALE STANCLE** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which **DONALD WALTERS** asked **DONYALE STANCLE** for **RODNEY PARKER**’s “972” number

because he had deleted it. They discussed the potential of **DEMARCUS JOHNSON**, **KENYA WALKER**, co-conspirator #11 and **DEMONN PARKER** cooperating with law enforcement and how police were trying to build a conspiracy. (TT#4, #00094)

305. On February 11, 2014 **DONYALE STANCLE** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which they discussed **DEMARCUS JOHNSON's** traffic stop and how they were suspicious of **KENYA WALKER**. (TT#3, #04710)

306. On February 15, 2014, **DONYALE STANCLE** and an unidentified male knowingly participated in a telephonic communication in which they discussed **LORELL BATTLE** and gambling. (TT#3, #05376)

307. On February 15, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which they discussed "making a move" (distribute drugs) and they wanted to "meet up" (to avoid using the phones). (TT#2, #05889)

308. On or about February 17, 2014, a member of the Hoover Crips street gang, co-conspirator #1 was transported from federal court in Tulsa, Oklahoma.

309. On or about February 17, 2014, co-conspirator #1 was assaulted by several inmates while in federal custody at Creek County Detention Center, Sapulpa, Oklahoma. During the assault, one of the assailants told co-conspirator #1 "it is a fed thing."

310. On February 19, 2014, **DONALD WALTERS** and **LORELL BATTLE** (in jail) knowingly participated in a telephonic conversation in which they discussed

**LORELL BATTLE's** drug case and how co-conspirator #2 pleaded to 5 years. **DONALD WALTERS** asked about "his other kinfolk" (**BLADES**) and **LORELL BATTLE** said he "didn't take anything" (didn't plea out). They discussed breeding dogs and taking care of prepping dogs for fighting. (TT#2, #06640)

311. On February 19, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed **LORELL BATTLE** being upset at **RODNEY PARKER** because he wasn't doing anything for him (money on books). **RODNEY PARKER** said **LORELL BATTLE** was supposed to be in touch with him. **RODNEY PARKER** called co-conspirator #8 twice but she had not called back. (TT#2, #06682)

312. On February 20, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic conversation in which they discussed ways to avoid police detection (driving at night instead of day) and discussed particular officers involved in investigations on them. (TT#3, #06286)

313. On February 20, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in two telephonic conversations in which they discussed the distribution of narcotics. However, the customer decided to wait for **DONALD WALTERS** the following day. (TT#4, #00305, #00307)

314. On February 20, 2014, **DONYALE STANCLE** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which they discussed how **STEWART** was struggling in the drug business. (TT#4, #00312)

315. On February 20, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic conversation in which they discussed the possession of bad cocaine **STEWART** purchased and manufacturing crack cocaine. **DONYALE STANCLE** said “we gotta get it back to the owner”. **STEWART** explained how the crack cocaine “went to dust” when he tried to cook it. (TT#4, #00316, #00319)

316. On February 20, 2014, **DONYALE STANCLE** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which they discussed **STEWART**'s inability to manufacture crack cocaine and how he needed to have someone experienced cook it. **DONYALE STANCLE** asked **DONALD WALTERS** if he could “get that hot iron” so he could get “this trick ass nigga his money back.” (TT#4, #00321)

317. On February 20, 2014, **DONALD WALTERS** and **STEWART** knowingly participated in a telephonic communication in which **STEWART** asked if **DONALD WALTERS** still fought dogs “You still wrestlin’ with those dogs.” They discussed **DONYALE STANCLE** going to jail after leaving **STEWART**'s house. (TT#2, #06857)

318. On February 20, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which **DONYALE STANCLE**'s reported his traffic stop to **DONALD WALTERS**. They also discussed **DEMARCUS JOHNSON**'s stop. (TT#2, #06872)

319. On February 21, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which they discussed if **STEWART** was snitching. They discussed that **KENYA WALKER** and **STEWART** should have done better and known they were being watched when **DONYALE STANCLE** got stopped. (TT#2, #06934)

320. On February 21, 2014, **DONYALE STANCLE** and person #35 knowingly participated in a series telephonic conversations in which **DONYALE STANCLE** discussed that he could not distribute drugs to person #35 until the law enforcement left from down the street of his house. (TT#3, #06352, #06354, #06355)

321. On February 22, 2014, **DONYALE STANCLE** and **JOHN WASHINGTON** knowingly participated in a telephonic conversation in which they discussed **JOHN WASHINGTON**'s traffic stop the previous night and the questions law enforcement asked. They discussed people "snitching" when they were in trouble. **DONYALE STANCLE** said, "Baby D" (**DONALD WALTERS**) was a fool if he doesn't think One Hundred (**LORELL BATTLE**) ain't up there (snitching)." (TT#3, #06600)

322. On February 22, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which they discussed **JOHN WASHINGTON**'s traffic stop. **DONALD WALTERS** said he hoped JD "got off that little 35 he had in the car." (TT#2, #07076)

323. On February 22, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic communication in which **JOHN WASHINGTON** reported his traffic stop to **DONALD WALTERS** and who the police asked about. (TT#2, #07155)

324. On February 22, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic communication in which they discussed that the "heat" is coming from "the Mansion." **DONYALE STANCLE** thinks it may be because co-conspirator #14 is snitching. (TT#2, #07163)

325. On February 24, 2014, **DONYALE STANCLE** and an unknown male knowingly participated in a telephonic conversation in which they discussed past informants, who they were, how a cooperator got killed, current cases, and how the Tulsa DA's need to "die of throat cancer...and their kids" because they are all dirty. (TT#3, #06886)

326. On February 25, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in two telephonic conversations in which **STEWART** asked **DONYALE STANCLE** to supply him with narcotics. **STEWART** said "I need you" and **DONYALE STANCLE** and **STEWART** argue about a past drug transaction. (TT#4, #00467, #00473)

327. On February 26, 2014, **DONALD WALTERS** and co-conspirator #28 knowingly participated in a telephonic communication in which co-conspirator #28 said he talked with **DONYALE STANCLE**, that "heat" is coming from "the Mansion", that

the police were serious and it is a federal investigation. Co-conspirator #28 said he was running out of money and needed to get back “there” soon. **DONYALE STANCLE** read an affidavit to co-conspirator #28 and that they (the police) were on their phones (intercepting). Co-conspirator #28 discussed a pending marijuana deal. (TT#2, #07813)

328. On February 26, 2014, **DONALD WALTERS** and an unidentified male (aka, “Terrell”) knowingly participated in a telephonic communication in which Terrell told **DONALD WALTERS** he needed to meet up to get worm medicine (for the fighting dogs). (TT#2, #07878)

329. On February 27, 2014, **COOPER** knowingly participated in a telephonic conversation when he left a voice mail for **DONYALE STANCLE** informing him that the police were setting up near the shop. (TT#3, #07421)

330. On February 27, 2014, **DONYALE STANCLE** and **COOPER** knowingly participated in a telephonic conversation in which they discussed the police “setting up” on the corner of **DONYALE STANCLE**’s street and the vehicles the police were driving. (TT#3, #07426)

331. On February 27, 2014, **DONYALE STANCLE** knowingly participates in a telephonic conversation in which he sent a text message to person #36 directing her to approach the police to find out what was going on (“pull up and be like are you guys looking for someone or something in this area. They may or may not tell you...”) (TT#3, #07431)



332. On February 28, 2014, **DONYALE STANCLE** and co-conspirator #37 knowingly participated in a telephonic conversation in which they discussed people in prison and discussed **DEMARCUS JOHNSON** and methods of the conspiracy. **DONYALE STANCLE** told co-conspirator #37 he was upset with **DEMARCUS JOHNSON** because he kept talking about cases over the phone and **DONYALE STANCLE** wanted to talk in person. (TT#4, #00558)

333. On February 28, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which they discussed the distribution of drugs. (TT#5, #00007)

334. On February 28, 2014, **DONALD WALTERS** and **HARRIS** knowingly participated in a telephonic conversation in which they discussed **HARRIS** distributing marijuana to **DONALD WALTERS** and **HARRIS** said he would give it to **JOHN WASHINGTON** so **DONALD WALTERS** could get it (drugs) from **JOHN WASHINGTON**. (TT#5, #00040)

335. On March 1, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a series of telephonic conversations in which they discussed a drug transaction. (TT#5, #00043)

336. On March 1, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a series of telephonic conversations about a drug transactions. (TT#5, #00043, #00049, #00052, #00053)

337. On March 1, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a series of telephonic conversations in which they discussed the distribution of “controlled substance, codeine”. (TT#5, #00055, #00056)

338. On March 3, 2014, **DONYALE STANCLE** knowingly transmitted a text message in which he told an unknown individual that they were finished gambling at 1719 East Oklahoma Street, Tulsa, Oklahoma. (TT#3, #08183)

339. On March 3, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which they discussed drugs that **MARIO WALTERS** hid in “the trash can back there.” (TT#5, #00115)

340. On March 3, 2014, **DONALD WALTERS** and co-conspirator #38 knowingly participated in a telephonic conversation in which they discussed the pending transport and distribution of drugs. (TT#5, #00119)

341. On March 3, 2014, **DONALD WALTERS** and **DEMARCUS JOHNSON** knowingly participated in a telephonic conversation in which they discussed how **DONYALE STANCLE** and others thought he was “hot” and he didn’t go to **DONYALE STANCLE**’s shop any more so **DEMARCUS JOHNSON** was going to have to move. (TT#5, #00123)

342. On March 4, 2014, **DONALD WALTERS** and co-conspirator #38 knowingly participated in a telephonic conversation in which they discussed co-conspirator #38’s arrival in Tulsa to distribute one kilogram of cocaine. (TT#5, #00144)

343. On March 4, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a telephonic conversation in which they discussed and prepared for co-conspirator #38's arrival with cocaine. **DONALD WALTERS** was picked up money from **TINSLEY**. (TT#5, #00145)

344. On March 4, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of cocaine and why co-conspirator #38 was not calling **DONALD WALTERS**. (TT#5, #00156, #00163)

345. On March 4, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a series of telephonic conversations in which **DONALD WALTERS** gave directions to **MARIO WALTERS** from whom to obtain drugs and where to hide proceeds of the drug sales (**SMITH's** shop). **DONALD WALTERS** provided **MARIO WALTERS** with **SMITH's** telephone number and **MARIO WALTERS** told **DONALD WALTERS** that **PURIFY** had been waiting for drugs all day. (TT#5, #00170, #00180, #00181)

346. On March 4, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the arrest of co-conspirator #38. (TT#5, #00182)

347. On March 4, 2014, co-conspirator #38 knowingly transported and possessed approximately one kilogram of cocaine with the intent to distribute it to

**DONALD WALTERS** and **MARIO WALTERS** at 7077 East 28th Court, Tulsa, Oklahoma.

348. On March 4, 2014, **DONALD WALTERS** and co-conspirator #11 knowingly participated in a telephonic communication in which co-conspirator #11 advised **DONALD WALTERS** the questions she was being asked at the federal grand jury sitting in the Northern District of Oklahoma. In the second call she requested to meet face to face with **DONALD WALTERS** and they agreed to meet at the Doubletree (hotel in Downtown Tulsa). (TT#2, #08617, #08634)

349. On March 4, 2014, co-conspirator #11 disclosed her grand jury testimony, line of questioning and suspected targets of the grand jury investigation.

350. On March 5, 2014, **DONALD WALTERS** and **STEWART** knowingly participated in a telephonic communication in which they discussed co-conspirator #11's grand jury testimony and a traffic stop of **DONALD WALTERS** by OHP in Stringtown. (TT#2, #08853)

351. On March 5, 2014, **DONYALE STANCLE** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which **DONYALE STANCLE** told **RODNEY PARKER** he needed to collect drug proceeds ("slide up and collect that little 350") from him and about co-conspirator #11 grand jury testimony and a possible federal investigation. (TT#3, #08533)

352. On March 5, 2014, **DONYALE STANCLE** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which they discussed the traffic

stop of co-conspirator #38 and the seizure of one kilogram of cocaine. **DONYALE STANCLE** informed **DONALD WALTERS**, “You know they went all through his phone.” (TT#4, #00659)

353. On March 5, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic conversation in which they discussed co-conspirator #11 going to grand jury, the questions she was asked and what her answers were. (TT#4, #00662)

354. On March 5, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic conversation in which they discussed co-conspirator #11 going to grand jury, the questions they asked her and what her answers were. (TT#4, #00662)

355. On March 5, 2014, **DONYALE STANCLE** and **STEWART** knowingly participated in a telephonic conversation in which they discussed **STEWART** needing to “square up” his \$10,000 debt and co-conspirator #11’s grand jury testimony. (TT#4, #00671)

356. On March 5, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which they discussed co-conspirator #11’s testimony at grand jury and possible pending indictments. (TT#5, #00196)

357. On March 5, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **CARWILE** asked when **DONALD**

**WALTERS** would be back so they could distribute drugs (“what’s up with our move”).  
(TT#5, #00208)

358. On March 5, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which they discussed the details of co-conspirator #38’s traffic stop and the potential he might be a snitch. (TT#5, #00212)

359. On March 6, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which they discussed co-conspirator #38 snitching and how co-conspirator #38 was supposed to get drug proceeds from **PURIFY** on the trip to Tulsa. (TT#5, #00217)

360. On March 6, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed co-conspirator #38’s traffic stop, how **MARZETT** recognized co-conspirator #38 in jail from a previous transaction and that **MARZETT** helped co-conspirator #38 out by letting him utilize his jail “pin” number to make telephone calls that would not be associated to co-conspirator #38 name. (TT#5, #00227)

361. On March 6, 2014, **DONALD WALTERS** and **DARON HARRIS** knowingly participated in a telephonic conversation in which they discussed the distribution of Codeine cough syrup and **DARON HARRIS** asked **DONALD WALTERS** “if he ever got that shit” and told **DONALD WALTERS** to call him if he gets more. (TT#5, #00229)

362. On March 6, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** ordered **CARWILE** to go by **MARIO WALTERS** and pick up drugs. **DONALD WALTERS** also wanted **CARWILE** to pick him up at the airport. (TT#5, #00230)

363. On March 6, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** ordered **CARWILE** to go to **MARIO WALTERS'** to retrieve drugs. Later **CARWILE** told **DONALD WALTERS** he did not want to transport that night ("roll around like that tonight") and would do so in the morning. (TT#5, #00234, #00236)

364. On March 6, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a telephonic conversation in which they discussed **TINSLEY** distributing Codeine cough syrup to **DONALD WALTERS**. (TT#5, #00237)

365. On February 19, 2014, **DONALD WALTERS** and **MARZETT** (in jail) knowingly participated in a telephonic conversation in which **MARZETT** confirmed co-conspirator #38 "came through" jail. They discussed **DONALD WALTERS** having paid money to **MARZETT**. They discussed co-conspirator #11 and her grand jury testimony. (#08944). **MARZETT** mentioned "that one time" when he saw co-conspirator #38 and recognized him. Co-conspirator #38 told **MARZETT** he is "in his good graces" and **DONALD WALTERS** will pay co-conspirator #38 back. (TT#2, #08944)

366. On March 7, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which they discussed observing a law enforcement vehicle conducting surveillance and **DONALD WALTERS** was going to go by and see if the law enforcement vehicle was there. **MARIO WALTERS** was waiting on **CARWILE** to arrive. (TT#5, #00243, #00245)

367. On March 7, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which they discussed **CARWILE** going to **MARIO WALTERS'** house to retrieve drugs. (TT#5, #00244)

368. On March 10, 2014, **DONYALE STANCLE** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which **DONALD WALTERS** called **DONYALE STANCLE** to get **DON WALKER's** telephone number ("Chucky's number") because **DONALD WALTERS** was making arrangements for an upcoming trip to Dallas. (TT#4, #00765)

369. From March 11, 2014 to March 12, 2014, **DONYALE STANCLE** and **DEMARCUS JOHNSON** knowingly participated in three telephonic conversations in which **DEMARCUS JOHNSON** indicated he was scared that law enforcement wanted to put him in grand jury. **DEMARCUS JOHNSON** told **DONYALE STANCLE** that a named officer wanted him to come down, (referring to Tulsa Police Officer Michael Helton.) They also discussed how police could not get charges if they (others) did not cooperate. (TT#4, #00793, #00803, #00857)



370. On March 12, 2014, **DONYALE STANCLE** and co-conspirator #28 knowingly participated in a telephonic conversation in which they discussed **DEMARCUS JOHNSON** being a snitch for law enforcement. They discussed a possible cooperator and Alan Shields (deceased by suicide) as having been an informant. (TT#4, #00863)

371. On March 13, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which they discussed **DEMARCUS JOHNSON** getting a rental car so he could leave town. They discussed that **DEMARCUS JOHNSON** needed to get out of here (Tulsa). (TT#2, #09833)

372. On March 18, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic communication in which discussed gambling. **RODNEY PARKER** said he saw **DONYALE STANCLE** and they discussed police taking his DNA and this is serious. **DONALD WALTERS** says **DONYALE STANCLE** was “dead to the rights.” **DONALD WALTERS** told **RODNEY PARKER** “that fool” (co-conspirator #23) kept calling and texting him. (TT#2, #10735)

373. From April 4 - 12, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in multiple telephonic conversations in which they agreed to drug distribution. (TT#9, #00296, #00652, #00930, #01068)

374. From April 4 - 7, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic conversation in which they discussed and planned

the distribution of drugs (“can I get a single”). (TT#9, #00312, #00333, #00412, #00414, #00508, #00523, #00541)

375. On April 4, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a series of telephonic conversations in which **DONALD WALTERS** asked **RODNEY PARKER** “You takin’ care of your business (drug business)?” and **RODNEY PARKER** said he was waiting on someone and then he would go by **DONALD WALTERS**’ house. (TT#9, #00341, #00343, #00344)

376. On April 4, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in multiple telephonic conversations in which **DELOUISER** told **DONALD WALTERS** he would be by to get drugs (“hit you up”) (“meet up”) in a minute. (TT#9, #00347, #00384)

377. On April 5, 2014, **DONALD WALTERS** and **JOHN WASHINGTON** knowingly participated in a telephonic conversation in which **JOHN WASHINGTON** provided **DONALD WALTERS** with **DARON HARRIS**’ telephone number. (TT#9, #00373)

378. On April 5, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a telephonic conversation in which **TINSLEY** told **DONALD WALTERS** they were “blowing on” marijuana and **DONALD WALTERS** said he would be coming by. (TT#9, #00383)

379. On April 5, 2014, **DONALD WALTERS** and **SMITH** knowingly participated in a telephonic conversation in which they discussed members of the gang

and they needed to act like it, person #18, **DARON HARRIS**. **SMITH** went to Crawford Park and a lot of old “thug niggas” were upset at the police, including **KENYA WALKER**. They discussed a Hoover Crip (Deandre Starks) being killed by police. They discussed paperwork on individuals who were arrested in an effort to determine if they were cooperating. (TT#9, #00424)

380. From April 5 - 16, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in multiple telephonic conversations in which they discussed **COLBERT**'s distribution of drugs including codeine cough syrup (“oil”) to **DONALD WALTERS**. (TT#9, #00429, #00593, #00605, #00656, #00716, #00840, #00841, #00897, #00917, #01078, #01202)

381. On April 5, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which they discussed **DONALD WALTERS** distributing drugs to **RODNEY PARKER** (“swing through”). (TT#9, #00452)

382. On April 7, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic conversation in which they discussed a drug debt and what the suppliers charge. (TT#9, #00532)

383. On April 7, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** warned **DONYALE STANCLE** that the police were “out today”. They described a

surveillance vehicle and that they were actively conducting counter-surveillance. (TT#9, #00542)

384. On April 7, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a telephonic conversation in which **COLBERT** informed **DONALD WALTERS** “niggas got ‘zips’ for us” (two ounces). They then discussed locations to meet and get the cocaine. (TT#9, #00544, #00550)

385. On April 7, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which **DONALD WALTERS** was at “mommas house” and **MARIO WALTERS** was getting marijuana (“some smoke”) from **FNU LNU #1**, a/k/a “Tiger”. (TT#9, #00568)

386. On April 7, 2014, co-conspirator #40 and co-conspirator #39 knowingly transported approximately one pound of marijuana in a 2004 BMW 525i, Oklahoma tag 135-KEM, to **DONALD WALTERS** in Tulsa, Oklahoma and knowingly participated in a telephonic conversation related to drug distribution. (TT#9, #005223, #00541)

387. On April 8, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a telephonic conversation in which they discussed identifying an undercover police vehicle, what the vehicle was doing and what they would or should do in order to avoid law enforcement detection. (TT#9, #00599)

388. On April 8, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a series of telephonic conversations in which they discussed the

distribution of drugs when **DONALD WALTERS** told **TINSLEY** he “will hit you up” (drug transaction). They later discussed his arrival. (TT#9, #00600, #00650)

389. On April 8, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which they agreed to meet face-to-face instead of talk over the phone. This was to avoid a telephone intercept or “wiretap” conducted by law enforcement. (TT#9, #00648)

390. On April 9, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** told **CARWILE** “I got these shoes over here” (cocaine). **CARWILE** told him he would be there in a little bit. (TT#9, #00682)

391. On April 10, 2014, **DONALD WALTERS** and **STEWART** knowingly participated in a telephone conversation in which they discussed breeding pit bulls to create aggressive dogs (“they’ll be the ‘heat’”) (TT#9, #00718)

392. On April 10, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a series of telephonic conversations in which they discussed their location as **DONALD WALTERS** travelled to **TINSLEY**. (TT#9, #00785)

393. On April 12, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a series of telephonic conversations in which co-conspirator #23 told **DONALD WALTERS** he was “getting ready for your boys” and how co-conspirator #23 was preparing to travel to Tulsa to distribute cocaine. (TT#9, #00916) –

**DONALD WALTERS** called **DELOUISER** after and told him the transaction would probably be tomorrow. (TT#9, #00961)

394. On April 12, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a series of telephonic conversations in which **DONALD WALTERS** and **COLBERT** discussed the distribution of marijuana (“zip, onion”). (TT#9, #00941, #00944, #00946, #00948, #00951, #00960)

395. On April 13, 2014, **DONALD WALTERS** and **STEWART** knowingly participated in a telephonic conversation in which **STEWART** discussed the “Crips” at a Tulsa nightclub the previous night, including co-conspirator #41 and how they thought he was a snitch. (TT#9, #00961)

396. On April 13, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which they discussed gambling, other members to the conspiracy and how **DONALD WALTERS** talked to **STEWART** and was told all the “Crips” were at the nightclub the previous night including, person #18. **DONALD WALTERS** told **RODNEY PARKER** there is paperwork on co-conspirator #41. (TT#9, #01002), meaning **WALTERS’** had proof that co-conspirator #41 was an informant.

397. On April 13, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** told **CARWILE** he needed to obtain cocaine (“need to grab a little of that dust”). (TT#9, #01006)

398. On April 13, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which they discussed getting cocaine from **CARWILE** and **RODNEY PARKER** said he would rather just get it from “kinfolk” since he was just around the corner. (TT#9, #01012)

399. On April 13, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a series of telephonic conversations during which co-conspirator #23 was travelling to Tulsa to distribute cocaine to **DONALD WALTERS**. (TT#9, #01027, #01028, #01044, #01045, #01047, #01052, #01053)

400. On April 13, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic conversation in which they discussed marijuana, **HARRIS** and dog breeding for fighting, prize winning dogs, dog names, etc. (TT#9, #01035)

401. On April 13, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a series of telephonic conversations in which **DONALD WALTERS** indicated he was going to **TINSLEY**'s to get drugs (“bump into you”). (TT#9, #01037, #01041)

402. On April 13, 2014, co-conspirator #23 distributed one kilogram of cocaine to **DONALD WALTERS**. Co-conspirator #23 arrived in a 2007 Infinity at 11011 E. 27th Stree. (**WALTERS**' house) and followed **DONALD WALTERS** (driving person #16 Ciji's white car) to collect payment and deliver cocaine. (co-conspirator #23 interview, Physical surveillance)

403. On April 13, 2014, **DONALD WALTERS** and **TINSLEY** knowingly participated in a telephonic conversation in which **DONALD WALTERS** told **TINSLEY** he had cocaine for distribution (“I’m ready...come this way”) (TT#9, #01066)

404. On April 14, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in series of telephonic conversations in which they discussed the distribution of cocaine and where they were to meet. (TT#9, #01075, #01079)

405. On April 15, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of cocaine. (TT#9, #01132-01134, #001149)

406. On April 16, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which **DONYALE STANCLE** told **DONALD WALTERS** he was about to sell drugs at the car wash “to make a hustle up there.” (TT#9, #01199)

407. On April 16, 2014, **DONALD WALTERS** and **STEWART** knowingly participated in a telephonic conversation in which **STEWART** asked **DONALD WALTERS** if he had any controlled substances for distribution and **DONALD WALTERS** referred him to **RODNEY PARKER**. (TT#9, #01213)

408. On April 18, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of cocaine and amounts. (“bring gym clothes”) (TT#9, #01257, #01258)



409. On April 18, 2014, **DONALD WALTERS** and co-conspirator #11 knowingly participated in a telephonic conversation in which she identified herself and **COLBERT** as Hoover Crips and implicated him as a robber. (TT#9, #01271)

410. On April 19, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which **DONALD WALTERS** informed **RODNEY PARKER** he “went ahead and grabbed it” (met with co-conspirator #23 and got cocaine). (TT#9, #01363)

411. On April 21, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a series of telephonic conversations in which they discussed pending transportation and distribution of cocaine, a traffic stop of **CERECERES** and **MARTINEZ** and the “spot” concealment location in the car. (TT#9, #01534, #01542, #01544, #01545, #01573, #01574, #01580, #01581, #01582, #01583, #01587, #01591, #01592, #01594, #01595, #01622)

412. On April 22, 2014, **DONALD WALTERS** and **RODNEY PARKER** knowingly participated in a telephonic conversation in which **RODNEY PARKER** discussed coming up short (in his last cook) and discussed manufacturing crack cocaine. (TT#9, #01636)

413. On April 22, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** asked **CARWILE** if he was at the “spot”, that **DONALD WALTERS** wanted cocaine from **CARWILE** for **DONALD WALTERS**’ “lil people.” **CARWILE** then told **DONALD**

**WALTERS** to “just pull up on me” to collect cocaine. During this conversation they discussed marijuana and cocaine. (TT#9, #01645)

414. On April 23, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in a telephonic conversation in which **DONALD WALTERS** said “it’s all bad” “still waiting” “he’ll hit ‘him” (discussing not having a supply of cocaine but he would distribute to **DELOUISER** when he gets it). (TT#9, #01683)

415. On April 25, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which he informed **DONALD WALTERS** of the traffic stop, how the police didn’t find the cocaine and how he can get the car out of impound later. Co-conspirator #23 asked **DONALD WALTERS** how many kilograms he wanted for the future transaction (“work out one or two hours”) (TT#9, #01832)

416. On April 27, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which they discussed drug proceeds and how much **CARWILE** had before he went to collect from someone. (TT#9, #01893)

417. On April 27, 2014, **DONALD WALTERS** and **DELOUISER** knowingly participated in a telephonic conversation regarding drug proceeds and **DONALD WALTERS** indicated he was going to stop by and collect money. (TT#9, #01900)

418. On April 28, 2014, **DONALD WALTERS** and co-conspirator #28 knowingly participated in a telephonic conversation in which co-conspirator #28 claimed he owed a lot of money (“I owe everyone with pockets”). They discussed going to Ohio

and how each of them had spoken with **BOCOOK** recently about distribution to Ohio.  
(TT#9, #01968)

419. On April 29, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed heading straight to Ohio to distribute. Co-conspirator #23 did not want to go through Tulsa. They had a discussion about **CERECERES'** traffic stop. **DONALD WALTERS** stated he had talked to Ohio and they were ready already (had the money for the purchase of cocaine). (TT#9, #02000)

420. On May 2, 2014, **DONALD WALTERS** and **DONYALE STANCLE** knowingly participated in a telephonic conversation in which they discussed information relating to a trip to Las Vegas. They discussed the possibility of **DEMONN PARKER** "snitching" because of the way he had been acting and how long his pending state charge was passed. They discussed **DEMONN PARKER** calling co-conspirator #28 "out of the blue" and it made **DONYALE STANCLE** and **DONALD WALTERS** suspicious of him. (TT#9, #02202)

421. On May 3, 2014, **DONALD WALTERS** and **MARZETT** knowingly participated in a telephonic conversation in which they discussed their drug activities. **MARZETT** asked if **DONALD WALTERS** had given his name to "the Mexicans" (**WALTERS'** suppliers) because they just "popped up" on him and he owed them a bunch of money. **MARZETT** asked if **BLADES** was snitching because **MARZETT**

heard something in jail. **DONALD WALTERS** said he put money on **BLADES'** books. (Indicating he had control over **BLADES**) (TT#9, #02222)

422. On May 3, 2014, **DONALD WALTERS** and co-conspirator #28 knowingly participated in a series of telephonic conversations about the distribution of narcotics. Co-conspirator #28 brokered the distribution of marijuana between **DONALD WALTERS** and an unknown female, aka "Christina." After getting the marijuana, **DONALD WALTERS** informed **CARWILE** know he had the marijuana. (TT#9, #02245, #02246, #02250, #02274)

423. On May 6, 2014, **DONALD WALTERS** and **COLBERT** knowingly participated in a telephonic conversation involving the distribution of drugs. **COLBERT** brokered a transaction between **DONALD WALTERS** and an unknown male, aka "my lil homie" for \$900 worth of drugs. **DONALD WALTERS** said he had it prepared for \$1,000 so he "may have to take some out of it." (TT#9, #02406, #02412)

424. On March 25, 2014, **MARIO WALTERS** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which they discussed the shooting of an unknown individual known as "Four Trey". (TT#7, #00050)

425. On March 25, 2014, **MARIO WALTERS** and an unidentified male knowingly participated in a telephonic conversation in which **MARIO WALTERS** informed that a person had been shot by police and that person used to buy pounds of marijuana from **MARIO WALTERS** ("used to get all them shirts from me"). (TT#7, #00055)

426. On March 26, 2014, **MARIO WALTERS** and co-conspirator #49 knowingly participated in a telephonic conversation in which **MARIO WALTERS** told co-conspirator #49 that Deandre Starks was killed at the house they distributed drugs from (“the spot”). (TT#7, #00132)

427. On March 26, 2014, **MARIO WALTERS** told an unidentified female he needed to go speak with **RODNEY PARKER** because **RODNEY PARKER** would not speak on the phone. (TT#7, #00169)

428. On March 27, 2014, **MARIO WALTERS** and co-conspirator #49 knowingly participated in a telephonic conversation in which co-conspirator #49 identified “all of D’s dealers” on TV when she watched the news story about the person having been shot. Co-conspirator #49 also mentioned that a person tried to “get with” all of “D’s dealers.” (TT#7, #00260)

429. On March 27, 2014, **MARIO WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **CARWILE** and **MARIO WALTERS** discussed the distribution and prices of Codeine cough syrup and that **DONALD WALTERS** had the money for it. (TT#7, #00351)

430. In March 28, 2014, co-conspirator #46 stored firearms for **MARIO WALTERS** at her apartment in Tulsa, Oklahoma.

431. On March 28, 2014, **MARIO WALTERS** knowingly possessed a firearm loaded with 17 rounds of ammunition, to wit a Taurus 9mm handgun, serial number TA044316 and other firearms. (“I got all these motha fuckin’ pistols, you don’t know

nobody that wants pistols huh”) **MARIO WALTERS** specifically describes a chrome 9mm (like the Taurus) that “doesn’t even have a scratch on it.” (TT#, #00424)

432. On March 28, 2014, **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL** planned a retaliation shooting of Hoover Crips gang members.

433. On March 28, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic conversation in which they discussed gang life. **PURIFY** stated “this is still thug town (Tulsa)” and how the “young niggas gotta have a pistol.” (TT#7, #00387)

434. On March 28, 2014, **MARIO WALTERS** and **MICHAEL WASHINGTON**, aka “Big Mike,” knowingly participated in a series of telephonic conversations in which they discussed, planned, and detailed the illegal transfer of a firearm (“a thump”). **MARIO WALTERS** told Mike (TT#7, #00396, #00472, #00473, #00474)

435. On March 28, 2014, **MARIO WALTERS** and **MICHAEL WASHINGTON** knowingly participated in a series of telephonic conversations in which they discussed the distribution of marijuana. (TT#7, #00441)

436. On March 28, 2014, **MARIO WALTERS** and an unidentified male participated in a telephonic conversation in which **MARIO WALTERS** discussed selling some of his guns to the unidentified male. **MARIO WALTERS** indicated he was actively trying to sell guns before his planned move to Texas. (TT#7, #00450)

437. On March 28, 2014, **MARIO WALTERS** and co-conspirator #46 knowingly participated in four telephonic conversations in which they discussed the illegal transfer of a firearm. **MARIO WALTERS** tells co-conspirator #46 to (“pull that thing out, I’m about to come get it”) (Call #00480-“Bring that out in your purse). (TT#7, #00477, #00479, #00480, #00482)

438. On March 28, 2014, co-conspirator #46 knowingly assisted **MARIO WALTERS** in the transfer of Taurus 9mm handgun, serial number TA044316 to **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL**, aka “Lil Co,” by concealing it in a purse, bringing it outside her apartment located at The Eagle Point Apartments, 5802 E. 71st Street, Apartment 1414, Tulsa, Oklahoma and providing it to **MARIO WALTERS, MICHAEL WASHINGTON** and **ADRIAN CAMPBELL**.

439. On March 28, 2014, **MARIO WALTERS**, knowingly and illegally transferred a Taurus 9mm handgun, serial number TA044316 to **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL**.

440. On March 28, 2014, **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL** possessed a loaded firearm, to wit a Taurus 9mm handgun, serial number TA044316.

441. On March 28, 2014, **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL**, knowingly possessed marijuana.

442. On March 28, 2014, **MARIO WALTERS** and co-conspirator #46 knowingly participated in a telephonic conversation. Co-conspirator #46 stated,

“oooo...and he got that gun on him.” **MARIO WALTERS** discussed giving **MICHAEL WASHINGTON** the gun (“strap”) and how he thought his phone could be tapped because it happened so quickly. (TT#7, #00483)

443. On March 28, 2014, **MARIO WALTERS** and an unidentified female named “Keisha” knowingly participated in a series of telephonic conversation in which **MARIO WALTERS** discussed the traffic stop of **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL**. **MARIO WALTERS** said he just saw “the weed and the gun is in the trunk.” Keisha said the last time **ADRIAN CAMPBELL** was arrested “he gave up the whole click.” **MARIO WALTERS** referred to his “little homies.” **MARIO WALTERS** described police vehicles involved. Keisha discussed a “little drive by they did where a baby got shot.” **MARIO WALTERS** said, “If this nigga gonna say my name man...he’s in big trouble.” (TT#7, #00485, #00490)

444. On March 28, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic conversation in which **MARIO WALTERS** and **PURIFY** discussed the conspiracy as they (the police) took his gun (burner). **MARIO WALTERS** said that police arrested **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL** (“took out two of my little hitters man”). **MARIO WALTERS** said he needed **MICHAEL WASHINGTON** (“nigga in the ‘hood...I needed him”). (TT#7, #00495)

445. On March 28, 2014, **MARIO WALTERS** and an unidentified female named “Keisha” knowingly participated in a series of telephonic conversation in which



**MARIO WALTERS** discussed the conspiracy and how the last time **MARIO WALTERS** gave someone a gun they picked up shooting with intent charges (“the last nigga I gave a gun, this nigga shot his baby’s momma”). **MARIO WALTERS** told Keisha “shit happen for a reason. That nigga was gonna to kill somebody with that muthafuckin gun.” **MARIO WALTERS** told Keisha “I needed them. They took my soldiers from me. I needed them niggas man.” (TT#7, #00502)

446. On March 29, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic discussion in which **MARIO WALTERS** discussed branching out and selling PCP. They discussed the pros and cons of distribution of PCP. (TT#7, #00561)

447. On March 29, 2014, **MARIO WALTERS** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which they discussed the illegal transfer and possession of firearms in support of their conspiracy. (TT#7, #00562)

448. On March 29, 2014, **MARIO WALTERS** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which **DONALD WALTERS** ordered **MARIO WALTERS** to quit selling guns. **MARIO WALTERS** said, “he needed them niggas out here too.” **MARIO WALTERS** says he had two more firearms, a .357 but it is too big. **DONALD WALTERS** told **MARIO WALTERS**, “I told you I needed that muthafucker (gun).” (TT#7, #00562)

449. On March 29, 2014, **DONALD WALTERS** constructively possessed firearms. (TT#7, #00562)

450. On March 29, 2014, **MARIO WALTERS** possessed firearms. (TT#7, #00562)

451. On March 29, 2014, **MARIO WALTERS** and person #42 knowingly participated in a telephonic conversation in which they discussed giving **MICHAEL WASHINGTON** and **ADRIAN CAMPBELL** the gun and their arrest. **MARIO WALTERS** advised he thought about giving them the "AR" (a military style assault rifle). (TT#7, #00563)

452. On March 30, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic discussion in which they discussed the best way to transport illegal drugs with a female (as drivers) like **BOCOOK** does. They discussed vacuum sealing the drugs so police couldn't detect it. (TT#7, #00650)

453. On March 30, 2014, **MARIO WALTERS** and **CARWILE** knowingly participated in a telephonic discussion in which they discussed drug distribution and collection of drug proceeds ("waiting to get this bread"). (TT#7, #00692)

454. On March 31, 2014, **MARIO WALTERS** and an unidentified male knowingly participated in a telephonic discussion in which they discussed the means and methods of the gang conspiracy, "little homies" snitching, rules of the game and how they just went through the same shit and three or four people got killed. **MARIO WALTERS** told the unidentified male he would kill "both ya'all niggas" (**ADRIAN CAMPBELL** and **MICHAEL WASHINGTON**) if they implicated him. (TT#7, #00724)

455. On April 1, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic discussion in which **MARIO WALTERS** was brokering the distribution of codeine from "Lil E" to **PURIFY**. **MARIO WALTERS** told **PURIFY** he was waiting on **DEMONN PARKER**, aka "Running Back." (TT#7, #00965)

456. On April 2, 2014, **MARIO WALTERS** and **CARWILE** knowingly participated in a telephonic discussion regarding the distribution of drugs, payment for drugs, and **CARWILE** said he had a pending deal for 80 pounds of marijuana from Marco (**MARCOS CERECERES**). (TT#7, #01078)

457. On April 2, 2014, **MARIO WALTERS** and co-conspirator #46 knowingly participated in a telephonic discussion in which co-conspirator #46 was looking for a gun **MARIO WALTERS** placed under her couch. (TT#7, #01082)

458. On April 2, 2014, co-conspirator #46 stored a firearm for **MARIO WALTERS**. (TT#7, #01082)

459. On April 2, 2014, **MARIO WALTERS** possessed a firearm. (TT#7, #01082)

460. On April 2, 2014, **MARIO WALTERS** and co-conspirator #46 knowingly participated in a telephonic conversation in which **MARIO WALTERS** and co-conspirator #46 discussed that they should have received drugs the night before (from **CERECERES**) and **CARWILE** was with **MARIO WALTERS** during the call. (TT#7, #01121)

461. On April 4, 2014, **MARIO WALTERS** and unidentified male, aka “D Dub,” knowingly participated in a telephonic conversation in which **MARIO WALTERS** explained upcoming distribution of cocaine with **DONALD WALTERS** and **BOCOOK** in Ohio and how much money they would make selling the cocaine. **MARIO WALTERS** discussed seven firearms (“burners”) in his attic at the house. (TT#7, #01480)

462. On April 4, 2014, **MARIO WALTERS** possessed a firearm. (TT#7, #01480)

463. April 9, 2014, **MARIO WALTERS** and an unidentified male, aka “Lil Man,” knowingly participated in a telephonic conversation in which they discussed that Lil Man owed **MARIO WALTERS** drug proceeds and Lil Man was brokering the distribution of cocaine base, a/k/a “crack”, from **MARIO WALTERS** to an unknown male, aka “Squirrel.” **MARIO WALTERS** discusses “putting a lil chevy in the pot.” (meaning cooking crack) (TT#7, #02231)

464. On April 9, 2013, **MARIO WALTERS** and co-conspirator #44 Co-conspirator #44 knowingly participated in a telephonic conversation in which co-conspirator #44 wanted to know the price of an ounce of cocaine and **MARIO WALTERS** said it will cost “a stack” (\$1,000).

465. On April 10, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic conversation in which they discussed the conspiracy. **PURIFY** told **MARIO WALTERS** he could not come up with the money “didn’t meet

the quota” and how co-conspirator #43 got arrested and it had a direct effect on “them.” They discussed co-conspirator #43 partnership with **DON WALKER**, aka “Chucky.” **MARIO WALTERS** said he met co-conspirator #43 when **DON WALKER** had co-conspirator #43 distribute narcotics to him further for him to “pull up on him and grab something.” (TT#7, #02319)

466. On April 10, 2013, **MARIO WALTERS** and co-conspirator #44 knowingly participated in 6 telephonic conversations in which they discussed the distribution of marijuana from **MARIO WALTERS** to co-conspirator #44. In call #02325 **MARIO WALTERS** discussed how the arrest of co-conspirator #43 affected the entire conspiracy. **MARIO WALTERS** discussed that he was going to Ohio. **MARIO WALTERS** could not distribute cocaine because co-conspirator #43 was arrested, which affected **PURIFY**'s ability to obtain cocaine, **MARIO WALTERS** cannot get it from **PURIFY**. (TT#7, #02325, #02332, #02352, #02357, #02358, #02359)

467. On April 10, 2014, **MARIO WALTERS** knowingly distributed marijuana to co-conspirator #44 at the Promenade Mall, Tulsa, Oklahoma.

468. On April 10, 2014, **MARIO WALTERS** and co-conspirator #44 knowingly participated in a telephonic conversation in which they discussed law enforcement tactics and co-conspirator #44 was trying to delete everything from her phone. (TT#7, #02366)

469. On April 10, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic conversation in which they shared information regarding their criminal activities (the arrest of co-conspirator #44). (TT#7, #02369)

470. On April 11, 2014, **MARIO WALTERS** and **MICHAEL WASHINGTON** knowingly participated in a telephonic conversation in which they discussed co-conspirator #44 being a snitch. **MICHAEL WASHINGTON** wanted to purchase an ounce of cocaine and **MARIO WALTERS** explained that they may need to get a new source because everyone was “spooked” due to law enforcement action. (TT#7, #02488)

471. On April 12, 2014, **MARIO WALTERS** and an unidentified male knowingly participated in a telephonic conversation in which **MARIO WALTERS** told the unidentified male that 63 grams (“a 63”) will cost \$2,500 and that **MARIO WALTERS** knew who has some if the unidentified male was interested. (TT#7, #02674)

472. On April 12, 2014, **MARIO WALTERS** and **ADRIAN CAMPBELL** knowingly participated in a telephonic conversation in which **ADRIAN CAMPBELL** was upset at **MICHAEL WASHINGTON** for not taking the “rap” for the gun and **ADRIAN CAMPBELL** and **MARIO WALTERS** agreed to wait until **MICHAEL WASHINGTON** was with Keisha and then they will “roll up on him.” **ADRIAN CAMPBELL** said he didn’t have a problem “popping somebody.” **ADRIAN CAMPBELL** said he took the marijuana charge and **MICHAEL WASHINGTON** was supposed to take the gun. **MICHAEL WASHINGTON** was cooperating with police

and **ADRIAN CAMPBELL** saw it. **ADRIAN CAMPBELL** advised he took cocaine for **MICHAEL WASHINGTON** in the past and **MICHAEL WASHINGTON** “walked” on the charges. (TT#7, #02692)

473. On April 12, 2014, **MARIO WALTERS** and **MICHAEL WASHINGTON** knowingly participated in a telephonic conversation in which they discussed the traffic stop and that **ADRIAN CAMPBELL** was “tripping.” **MARIO WALTERS** wanted to know if **MICHAEL WASHINGTON** was going to take the case. (TT#7, #02714)

474. On April 13, 2014, **MARIO WALTERS** and an unidentified male knowingly participated in a telephonic conversation in which **MARIO WALTERS** discussed **DON WALKER** (“Chucky”) having not paid for drugs. **MARIO WALTERS** discussed how he needed to get the AR (assault rifle) out and about five cases of shells and start rolling up on people so they “understand things better.” **MARIO WALTERS** was upset his partner was turning people onto his “plug” (source of supply). (TT#7, #02823)

475. On April 13, 2014, **MARIO WALTERS** and **STEWART** knowingly participated in a telephonic conversation in which **MARIO WALTERS** told **STEWART** he had marijuana and should come over. **MARIO WALTERS** said the marijuana is the “stuff” **PURIFY** got. (TT#7, #02842)

476. On April 14, 2014, **MARIO WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **MARIO WALTERS** told **CARWILE**

that **PURIFY** said “its on” and “he’s got everything.” **MARIO WALTERS** said **DONALD WALTERS** had (“knocks”) customers lined up. **MARIO WALTERS** said “we’re ghetto bandits baby” and **CARWILE** said he needed to call **DEMONN PARKER**. (TT#7, #03011)

477. On April 14, 2014, **MARIO WALTERS** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which **MARIO WALTERS** advised that **PURIFY** had drugs for sale and **MARIO WALTERS** asked **DONALD WALTERS** to send more “knocks” (customers) his way. (TT#7, #03014)

478. On April 16, 2014, **MARIO WALTERS** and a unknown person knowingly participated in a series of telephonic conversations in which **MARIO WALTERS** agreed to distribute marijuana to that person. (TT#7, #03337-03340, #03342)

479. On April 16, 2014, **MARIO WALTERS** distributed marijuana to a person in exchange for money. (TT#7, #03317, #03332, #03342)

480. On April 17, 2014, **MARIO WALTERS** and co-conspirator #46 knowingly participated in a telephonic conversation in which **MARIO WALTERS** informed co-conspirator #46 that he was the one who put **PEARSON** “in the game.” **MARIO WALTERS** was discussed how **PEARSON** was not good at dealing drugs and how police will find concealment devices in your vehicle. There was also discussion about “Hoova niggas”, and an uzi (assault rifle). (TT#7, #03364)

481. On May 18, 2014, **MARIO WALTERS** possessed a firearm at 7707 East 28th Court, Tulsa, Oklahoma.



482. On May 18, 2014, **MARIO WALTERS** had a phone conversation with **DONALD WALTERS** wherein he stated he had removed a gun to avoid recovery by the police.

483. During the course of the conspiracy, co-conspirators travelled to Las Vegas, New Mexico, Dallas, Texas, San Francisco, Ohio, Atlanta, Georgia to Las Vegas, Dallas.

484. During the course of the conspiracy, Los Zetas Cartel associates distributed cocaine to **GONZALEZ** for redistribution to co-conspirator #23.

485. On February 28, 2014, **DONALD WALTERS** and co-conspirator #38 knowingly participated in a telephonic conversation regarding the distribution of drugs. Co-conspirator #38 advised he would have co-conspirator #23 call **DONALD WALTERS** for details. (TT#5, #00017)

486. On February 28, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of cocaine. (TT#5, #00018)

487. On February 28, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of illegal drugs. (TT#5, #00038)

488. On March 1, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed sending co-conspirator #38 to Tulsa since **BOCOOK** had arrived and the continued distribution of drugs. (TT#5, #00059)

489. On March 2, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a series of telephonic conversations in which they discussed the distribution of cocaine from co-conspirator #23 to **DONALD WALTERS** and the condition of the roads for transport of said drugs. (TT#5, #00067, #00076)

490. On March 3, 2014, **DONALD WALTERS** and co-conspirator #38 knowingly participated in a series of telephonic conversations in which they discussed the distribution of cocaine. Co-conspirator #38 indicated he had a 4X4 vehicle so he would be fine to transport the narcotics. (TT#5, #00082, #00098, #00110)

491. On March 3, 2014, **DONALD WALTERS** and **HARRIS** knowingly participated in a series of telephonic conversations in which they discussed the distribution of drugs and **DONALD WALTERS** ultimately “pulls up on” **HARRIS**. (TT#5, #00083, #00094, #00095)

492. On March 3, 2014, **DONALD WALTERS** and **CARWILE** knowingly participated in a telephonic conversation in which **DONALD WALTERS** informed **CARWILE** that drugs were being distributed. (TT#5, #00108)

493. On March 5, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversations in which co-conspirator #23 told **DONALD WALTERS** he would bond co-conspirator #38 out of jail and meet with **DONALD WALTERS** in person to talk about the events (TT#5, #00214)

494. On March 6, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed co-

conspirator #38's traffic stop, how **MARZETT** recognized co-conspirator #38 in jail from a previous transaction and **MARZETT** helped co-conspirator #38 out by letting him utilize his jail "pin" number to make telephone calls that would not be associated with his name. (TT#5, #00227)

495. On March 6, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which they discussed co-conspirator #38 getting caught with a kilogram of cocaine. **MARIO WALTERS** said "that nigga's dead" several times. They continued to discuss that co-conspirator #23 delivered a kilogram of cocaine on this date and left it with **MARIO WALTERS**. **DONALD WALTERS** says his "partner" (**MARZETT**) said co-conspirator #38 was in jail. (TT#5, #00233)

496. On March 26, 2014, **CERECERES** and **DON WALKER** knowingly participated in a telephonic conversation in which **CERECERES** told **DON WALKER** he needed payment (drug proceeds) if **DON WALKER** wanted any more drugs. (TT#8, #00104)

497. On March 27, 2014, **CERECERES** and **DON WALKER** knowingly participated in a series of telephonic conversations in which they discussed **DON WALKER's** debt of drug proceeds to **CERECERES** and how **DON WALKER** was attempting to collect money to pay **CERECERES**. (TT#8, #00217, #00218, #00246)

498. On March 27, 2014, **CERECERES** and an unknown male knowingly participated in a series of telephonic conversations in which **CERECERES** discussed

making payments to a source of supply in Mexico. (TT#7, #00259, #00260, #00264-00270, #00278-00282)

499. On March 27, 2014, **CERECERES** directs multiple wire transfers to Mexico of drug proceeds in order to pay \$10,000 for drugs. (TT#7, #00259, #00260, #00264-00270, #00278-00282)

500. On March 27, 2014, **CERECERES** and **DON WALKER** knowingly participated in a telephonic conversation in which **DON WALKER** asked **CERECERES** to distribute one kilogram of cocaine to him. (TT#8, #00283)

501. On March 28, 2014, **CERECERES** and **DON WALKER** knowingly participated in a telephonic conversation in which **CERECERES** asked **DON WALKER** about payment for the drugs, "what up with that". (TT#8, #00296)

502. On March 29, 2014, **CERECERES** and **DON WALKER** knowingly participated in a series of telephonic conversations in which **CERECERES** asked **DON WALKER** about payment for the drugs and **DON WALKER** told him payment would be the next day. **CERECERES** told **DON WALKER** he was getting pressure from his suppliers for payment. ("these dudes is sweatin me") (TT#8, #00319, #00320, #00321)

503. On March 30, 2014, **CERECERES** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which **DONALD WALTERS** asked when **CERECERES** would have cocaine for distribution and **CERECERES** told **DONALD WALTERS** he would advise him when "they" had it. (TT#8, #00329)

504. On March 30, 2014, **CERECERES** and **DON WALKER** knowingly participated in a series of telephonic conversation in which **CERECERES** was attempting to collect payment from **DON WALKER** and that he was working for co-conspirator #23 in co-conspirator #23's absence. **DON WALKER** was still trying to collect the drug debts. (TT#8, #00332, #00334, #00336, #00352-00354)

505. On March 30, 2014, **CERECERES** and **DON WALKER** knowingly participated in a telephonic conversation in which **CERECERES** said he talked to co-conspirator #23 and asked **DON WALKER** what time he would be ready (for the distribution). (TT#8, #00338)

506. On March 30, 2014, **CERECERES** and **DON WALKER** knowingly participated in a telephonic conversation in which **DON WALKER** said "my people fucked up" and he didn't want **CERECERES** to continue contacting him for money. **CERECERES** explained that he works for co-conspirator #23. **DON WALKER** discussed how much he owed. (TT#8, #00339)

507. On March 30, 2014, **CERECERES** and **PURIFY** knowingly participated in a series of telephonic conversations in which they discussed future distribution of drugs "when everything gets good." (TT#8, #00341-00343, #00345-00346, #00348-00349)

508. On March 31, 2014, **CERECERES** and co-conspirator #43 knowingly participated in a telephonic conversation in which co-conspirator #43 referred to co-

conspirator #23 as “boss man” and said “you’re killing me” because co-conspirator #43 needed a supply of drugs. (TT#8, #00361)

509. On April 2, 2014, **CERECERES** and **GONZALEZ** knowingly participated in a telephonic conversation in which **GONZALEZ** informed **CERECERES** that the drugs had arrived and they would discuss future distribution. (TT#8, #00393)

510. On April 3, 2014, **CERECERES** and **DONALD WALTERS** knowingly participated in a telephonic conversation in which **CERECERES** told **DONALD WALTERS** that co-conspirator #23 said to start getting ready for the distribution of drugs. (TT#8, #00404)

511. On April 3, 2014, **CERECERES** and co-conspirator #43 knowingly participated in a series of telephonic conversation in which they prepared for the distribution of drugs. (TT#8, #00405-0409)

512. On April 4, 2014, **CERECERES** and co-conspirator #43 knowingly participated in a series of telephonic conversation in which they are prepared for the distribution of drugs. (TT#8, #00471-00474, #00500, #00507, #00511)

513. On April 5, 2014, **CERECERES** and co-conspirator #43 knowingly participated in a series of telephonic conversation in which they discussed a trip from Oklahoma City to Tulsa and where they were in Tulsa to distribute marijuana. (TT#8, #00518, #00520-00523, #00525-00534, #00536-00538)

514. On April 5, 2014, **CERECERES** knowingly distributed approximately 90 pounds of marijuana to co-conspirator #43 at the Villas of Yorktown, 1910 East 49th Street, Apartment, Apartment 217, Tulsa, Oklahoma.

515. On April 5, 2014, person #45 acted as a lookout while co-conspirator #43 and an unidentified male conducted a drug transaction at Villas of Yorktown, 1910 East 49th Street, Apartment 217, Tulsa, Oklahoma.

516. On April 5, 2014, co-conspirator #43, knowingly possessed with intent to distribute approximately 1 kilogram of marijuana in a Kia Sorento, VIN 5XYKU4A15BG034640, while person #45 drove him to a customer to make a delivery.

517. On April 5, 2014, co-conspirator #43 possessed approximately \$4,400 in drug proceeds and a handgun while distributing marijuana.

518. On April 5, 2014, **CERECERES** and an unknown female knowingly participated in a series of telephonic conversation in which **CERECERES** attempted to locate **DON WALKER** for payment of drug proceeds. (TT#8, #00551)

519. On April 6, 2014, co-conspirator #43 knowingly possessed with intent to distribute approximately 90 pounds of marijuana at the Villas of Yorktown, 1910 East 49th Street, Apartment, Apartment 217, Tulsa, Oklahoma.

520. On or about April 7, 2014, co-conspirator #23 crossed the U.S./Mexico border and returned to the United States.

521. On April 7, 2014, co-conspirator #23 and **DONALD WALTERS** knowingly participated in a telephonic conversation in which co-conspirator #23 notified

**DONALD WALTERS** that he returned to the U.S. and they planned for the distribution of cocaine. (TT#8, #00571)

522. On April 7, 2014, co-conspirator #23 and co-conspirator #43 knowingly participated in a telephonic conversation in which co-conspirator #23 said he had returned to the U.S. and wanted to plan for distribution of cocaine. (TT#8, #00576)

523. On April 7, 2014, co-conspirator #23 and **PURIFY** knowingly participated in a telephonic conversation in which they planned for distribution of cocaine “in a couple days.” (TT#8, #00577)

524. On April 7, 2014, co-conspirator #23 and **PURIFY** knowingly participated in a series of telephonic conversations in which they planned for distribution of cocaine. Co-conspirator #23 told **PURIFY** he had narcotics to distribute but it would be cash only “cash only deals.” (TT#8, #00586-00587)

525. On April 7, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which co-conspirator #23 asked if “homeboy” still needs “that one thing” (kilogram of cocaine they discussed previously). Co-conspirator #23 informed **DON WALKER** it was cash only. (TT#8, #00591)

526. On April 7, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic conversation in which co-conspirator #23 told **GONZALEZ** he was almost “there” (**GONZALEZ**’s house). (TT#8, #00605)

527. On April 7, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they agreed to distribute cocaine on



April 8. Co-conspirator #23 asked about co-conspirator #43 and wanted to know why co-conspirator #43 wasn't answering his phone. Co-conspirator #23 explained that **CERECERES** was very angry and "about to do some crazy things" because co-conspirator #43 had not paid for marijuana. (TT#8, #00608)

528. On April 8, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which co-conspirator #23 and **DON WALKER** discussed meeting up "at the store" (**DON WALKER's** store) in Oklahoma City to distribute marijuana. Co-conspirator #23 asked **DON WALKER** if he had spoken with "your third party" and **DON WALKER** told co-conspirator #23 to "just come to the store." (TT#8, #00632, #00641)

529. On April 8, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they discussed the third party being ready "tomorrow" and will be a little short on payment. They agree to meet at **DON WALKER's** store. (TT#8, #00649)

530. On April 8, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic conversation in which they discussed redistributing drugs to one of **GONZALEZ's** additional distributors. (TT#8, #00653)

531. On April 8, 2014, co-conspirator #23 and co-conspirator #43 knowingly participated in a series of telephonic conversations in which they discussed money that co-conspirator #43 owed for marijuana. Co-conspirator #43 said that **DON WALKER** "told me you all (co-conspirator #23 and **CERECERES**) are gonna try to kill me."

Ultimately they agree to meet at Baker Street.(TT#8, #00656-00660, #00678-00686, #00689-00693, #00706, #00708-00709, #00712, #00715-00717, #00719)

532. On April 8, 2014, co-conspirator #23 and **CERECERES** knowingly participated in a telephonic conversation in which they discussed co-conspirator #43 and **CERECERES** said he will be bringing a gun (“Matilda”) to a location. (TT#8, #00676)

533. On April 8, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic conversation in which they discussed a pending shipment of drugs and co-conspirator #23 asked **GONZALEZ** if he could “lend him one” (front one kilogram of cocaine). (TT#8, #00696)

534. On April 8, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which **DON WALKER** advised he spoke with co-conspirator #43 and they both knew he was scared. (TT#8, #00714)

535. On April 8, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they discussed that co-conspirator #43 was scared. They discussed co-conspirator #43 having a gun. Co-conspirator #23 and **DON WALKER** discussed **DON WALKER** going to co-conspirator #43’s apartment to get marijuana if he can get the keys from co-conspirator #43. **DON WALKER** agreed to go get the marijuana from co-conspirator #43’s apartment. (TT#8, #00723)

536. On April 8, 2014, **DON WALKER** obtained a key to co-conspirator #43’s apartment to recover the marijuana inside.

537. On April 8, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed travelling to Ohio, preparing to distribute cocaine to Ohio, how co-conspirator #23 had to go “way down South (Mexico)” because “it” (drug distribution) was slow. They discussed going to Las Vegas and staying at the Palms. (TT#9, #00582)

538. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which co-conspirator #23 told **DON WALKER** to get a new telephone number. They agreed to retrieve the marijuana at co-conspirator #43’s apartment. (TT#8, #00748)

539. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they discussed co-conspirator #43 not returning calls. (TT#8, #00752)

540. On April 9, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic conversation in which they discussed drug proceeds missing from the last drug transaction. (TT#8, #00759)

541. On April 9, 2014, co-conspirator #23 and **PURIFY** knowingly participated in a telephonic conversation in which co-conspirator #23 and **PURIFY** agreed to distribute one kilogram of cocaine. **PURIFY** told co-conspirator #23 could sell the kilogram quickly so co-conspirator #23 can have the money to take “south.” (TT#8, #00763)

542. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they discussed pending drug distribution and who they could deliver it to. (TT#8, #00771)

543. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they discussed what to do with the marijuana they believed was at co-conspirator #43's apartment. **DON WALKER** told co-conspirator #23 he was on his way to the apartment. (TT#8, #00772)

544. On April 9, 2014, co-conspirator #23 and **PURIFY** knowingly participated in a telephonic conversation in which **PURIFY** informed co-conspirator #23 that he had \$10,000 for the kilogram of cocaine. **PURIFY** advised he could get a few more thousand dollars after "I get rid of my kids" (so he can go collect). (TT#8, #00775)

545. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which **DON WALKER** advised he could not get ahold of co-conspirator #43 and he would keep trying. (TT#8, #00779)

546. On April 9, 2014, co-conspirator #23 and **PURIFY** knowingly participated in a telephonic conversation in which **PURIFY** was attempting to collect drug proceeds and told co-conspirator #23 to head to Tulsa. (TT#8, #00783)

547. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which they discussed transporting and distributing cocaine and retrieving the marijuana from co-conspirator #43's apartment. (TT#8, #00792, #00794)

548. On April 9, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic conversation in which **GONZALEZ** who angry at co-conspirator #23 for taking too long to return drug proceeds. (TT#8, #00801)

549. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a series of telephonic conversations in which they agreed to meet at 51st and Lewis in Tulsa, Oklahoma to retrieve the marijuana from co-conspirator #43's apartment. (TT#8, #00807,00808)

550. On April 9, 2014, co-conspirator #23 and **CERECERES** knowingly participated in a series of telephonic conversations in which **CERECERES** advised he was prepared for counter-surveillance as co-conspirator #23 and **DON WALKER** went to co-conspirator #43's apartment. (TT#8, #00810, #00812, #00813, #00820, #00821)

551. On April 9, 2014, co-conspirator #23 and **DON WALKER** knowingly participated in a telephonic conversation in which **DON WALKER** informed co-conspirator #23 he was at the apartment complex and they agreed to meet and go to the apartment. (TT#8, #00815, #00826)

552. On April 9, 2014, co-conspirator #23, **CERECERES** and co-conspirator #43 met at Applebee's in Tulsa, Oklahoma to discuss the money owed by co-conspirator #43 for marijuana seized from his apartment.

553. On April 9, 2014, **DON WALKER** and co-conspirator #23 travelled to co-conspirator #43's apartment to retrieve marijuana.

554. On April 10, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic conversation in which they agreed to meet in Dallas to discuss the missing proceeds. (TT#8, #00862)

555. On April 10, 2014, co-conspirator #23 and **CERECERES** knowingly participated in a telephonic conversation in which they discussed **GONZALEZ** blaming them for the missing drug proceeds and the problems they have with **GONZALEZ**. Co-conspirator #23 told **CERECERES** to get another telephone number. (TT#8, #00884)

556. On April 10, 2014, **MARIO WALTERS** and **PURIFY** knowingly participated in a telephonic conversation in which they discussed the conspiracy. **PURIFY** told **MARIO WALTERS** he could not come up with the money “didn’t meet the quota” and how co-conspirator #43 was arrested and it had a direct effect on “them.” They discussed co-conspirator #43’s partnership with **DON WALKER**. **MARIO WALTERS** said he met co-conspirator #43 when **DON WALKER** had co-conspirator #43 distribute narcotics to him “pull up on him and grab something.” (TT#7, #02319)

557. In approximately April, 2014, co-conspirator #23 arranged for a drug concealment device to be installed in his 2007 Infinity M45, Oklahoma tag 441-KKO, in order to hide loads of narcotics during transport.

558. On April 21, 2014, co-conspirator #23, **CERECERES**, **MARTINEZ** and **DON WALKER** planned to distribute one kilogram cocaine from **CERECERES** to **DON WALKER** at the direction of co-conspirator #23 in Tulsa, Oklahoma.

559. On April 21, 2014, co-conspirator #23, **CERECERES, MARTINEZ** and **DONALD WALTERS** planned to distribute two kilograms of cocaine from **CERECERES** to **LUCAS** at the direction of co-conspirator #23 in Tulsa, Oklahoma. Co-conspirator #23 hired **MARTINEZ** to drive the vehicle because **MARTINEZ** had a driver's license.

560. On or about April 21, 2014, co-conspirator #23 and **MARTINEZ** agreed to transport and distribute three kilograms of cocaine in Tulsa, Oklahoma when co-conspirator #23 hired and agreed to pay **MARTINEZ** to drive the drugs in a 2007 Infinity M45, Oklahoma tag 441-KKO, because he was a United States citizen and had a driver's license.

561. On April 21, 2014, co-conspirator #23 and **CERECERES** were in possession of a Springfield XD40 handgun, Serial Number XD521984, during the commission of a felony (distribution of illegal narcotics) in Tulsa, Oklahoma.

562. On April 29, 2014, co-conspirator #23 and co-conspirator #43 knowingly participated in a telephonic communication in which co-conspirator #23 was getting his drug transport ready ("getting things ready") and was attempting to collect owed drug proceeds from co-conspirator #43. Co-conspirator #43 tells co-conspirator #23 he will pull some more money from his 401K. (TT#11, #00009)

563. On April 29, 2014, co-conspirator #23 and an unidentified male knowingly participated in a telephonic communication in which they discussed the distribution of

cocaine. Co-conspirator #23 asked for 10 kilograms and said the demand is high. (TT#11, #00018)

564. On April 29, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which **GONZALEZ** discussed meeting with his supplier so that he could supply co-conspirator #23 with cocaine. (TT#11, #00021)

565. From April 29 - May 1, 2014, co-conspirator #23 and an unidentified male, aka "Lic" knowingly participated in a series of telephonic communications in which they discussed the price of cocaine (\$26,000-27,500/kilogram) and that co-conspirator #23 could buy 10 kilograms. (TT#11, #00022, #00026, #00038, #00040, #00042, #00062, #00503)

566. On April 30, 2014, co-conspirator #23 and an unidentified male discussed getting co-conspirator #23 10 kilograms (five one trip and five the next). "They" wanted to be paid in Mexico and they want \$27,500 per kilogram. Co-conspirator #23 attempted to negotiate the price down to \$26,000/kilogram. (TT#11, #00037)

567. On April 30, co-conspirator #23 and an unidentified male knowingly participated in a series of telephonic conversations in which they discussed a pending distribution of cocaine. (TT#11, #00050-00059)

568. From April 30 – May 2, 2014, co-conspirator #23 and an unknown male knowingly participated in a telephonic communication in which they discussed the details



of distribution between co-conspirator #23 and **FNU LNU #11**. (TT#11, #00068, #00444, #00479, #01136)

569. On May 1, 2014, co-conspirator #23 and **DONALD WALTERS** knowingly participated in a telephonic communication in which they discussed getting cocaine prepared for distribution to Ohio. (“yeah, cause that’s what I’m working on. Trying to get this whole 6 pack together.”) (TT#11, #00396)

570. On May 1, 2014, co-conspirator #23 and **LUCAS** knowingly participated in a telephonic communication in which they discussed distributing cocaine (“working out”) Monday or Tuesday when **LUCAS** could get the money together. (TT#11, #00492)

571. From May 1 -2, 2014, co-conspirator #23 and co-conspirator #43 knowingly participated in a series of telephonic communications in which co-conspirator #23 gave co-conspirator #43 his account number (again) under Ramirez Remodeling so that co-conspirator #43 would wire/transfer drug proceeds. Co-conspirator #43 wired proceeds (\$2,000) to co-conspirator #23. (TT#11, #00522, #00527, #00532, #00533, #00766, #00767, #00774, #00775, #00776, #00791, #00792, #00823)

572. On May 2, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which they discussed the distribution of cocaine. (TT#11, #00874)

573. On May 4, 2014, co-conspirator #23 and **LUCAS** knowingly participated in a telephonic communication in which co-conspirator #23 asked **LUCAS** how many

kilograms of cocaine he wanted (“how many days you want to work out”). (TT#11, #01357)

574. On May 4, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which they discussed drug distribution and payment. (TT#11, #01359)

575. On May 5, 2014, co-conspirator #23 and **DONALD WALTERS** knowingly participated in a telephonic communication in which **DONALD WALTERS** told co-conspirator #23 he “really needs it” (cocaine) and co-conspirator #23 told **DONALD WALTERS** he would be there (Tulsa) the next morning. (TT#11, #01387)

576. On May 5, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which they discussed meeting at “the river” and **GONZALEZ** and co-conspirator #23 agreed to leave and meet in two hours to transfer the cocaine. (TT#11, #01399)

577. On May 5, 2014, co-conspirator #23 and **LUCAS** knowingly participated in a telephonic communication in which co-conspirator #23 told **LUCAS** he would be there (Tulsa) early in the morning (May 6, 2014) to avoid traffic. (TT#11, #01438)

578. On May 5, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which they discussed meeting at a casino. **GONZALEZ** told co-conspirator #23 to park by his van and where to come inside the casino. (TT#11, #01464, #01465, #01466)

579. On or about May 5, 2014, co-conspirator #23, **GONZALEZ** and **LUCAS** conspired and planned the distribution of two kilograms of cocaine from Dallas, Texas to Tulsa, Oklahoma.

580. On May 5, 2014, **GONZALEZ** transported two kilograms of cocaine from Texas to Oklahoma in his brother's van. (TT#11, #01464)

581. On May 5, 2014, **GONZALEZ** knowingly distributed two kilograms of cocaine to co-conspirator #23 so that co-conspirator #23 could take the cocaine to Tulsa, Oklahoma for further distribution to **LUCAS**, aka "Beard" in Tulsa, Oklahoma.

582. On May 5, 2014, **GONZALEZ** ordered co-conspirator #23 to make payment of approximately \$52,000 on May 6, 2014.

583. On May 6, 2014, co-conspirator #23 knowingly possessed and transported two kilograms of cocaine in his 2005 Porsche Cayenne, Oklahoma tag 955-KCS.

584. On May 6, 2014, co-conspirator #23 and **LUCAS** knowingly participated in a telephonic communication in which **LUCAS** asked co-conspirator #23 "what time we hittin' the gym" (when will co-conspirator #23 be in Tulsa). Co-conspirator #23 told him "on my way." (TT#11, #01663, #01695, #01696, #01730, #01731, #01738)

585. On May 6, 2014, co-conspirator #23 and **DONALD WALTERS** knowingly participated in a telephonic communication in which they agreed to distribute one kilogram of cocaine. (TT#11, #01832, #01835, #01851)

586. On May 6, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which **GONZALEZ** demanded payment for the two kilograms of cocaine. (TT#11, #01703)

587. From May 6 - 7, 2014, **GONZALEZ** knowingly participated in a series of telephonic communications in which he left voice messages for co-conspirator #23 demanding payment for two kilograms of cocaine and ultimately threatened to go to co-conspirator #23 mother's house. (TT#11, #01754, #01757, #01759, #01760, #01768, #01773, #01782, #01783, #01784, #01788, #01801, #01844, #01849, #01852, #01860, #01862, #01883, #01885)

588. On May 7, 2014, co-conspirator #23 and **LUCAS** knowingly participated in a series of telephonic communications in which they discussed the distribution of cocaine. ("going to gym") (TT#11, #01807, #01808)

589. On May 7, 2014, **GONZALEZ** travelled from Dallas, Texas to the residence of Yolanda Ramirez, 911 North Gardner, Oklahoma City, Oklahoma, to intimidate co-conspirator #23 in an attempt to collect a drug debt for two kilograms of cocaine.

590. On January 22, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic communication in which they discussed the pending drug distribution to Ohio. **DONALD WALTERS** discussed using different phone numbers and talking with the unidentified male's "partner." (TT#2, #01143)

591. On February 28, 2014, **DONALD WALTERS** and **BOCOOK** knowingly participated in a telephonic conversation in which they discussed the distribution of drugs. **BOCOOK** inquired about distribution of cocaine and **DONALD WALTERS** said he would check with the suppliers. (TT#5, #00015, #00027)

592. On February 28, 2014, **DONALD WALTERS** and co-conspirator #38 knowingly participated in a telephonic conversation regarding the distribution of drugs. Co-conspirator #38 advised he would have co-conspirator #23 call **DONALD WALTERS** for details (TT#5, #00017)

593. On February 28, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of cocaine. (TT#5, #00018)

594. On February 28, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed the distribution of illegal narcotics (TT#5, #00038)

595. On March 1, 2014, **DONALD WALTERS** and **BAILEY** knowingly participated in a series of telephonic conversations in which they discussed where to meet upon **BAILEY's** arrival in Tulsa in furtherance of the drug distribution in Ohio. (TT#5, #00054, #0056, #00058)

596. On March 1, 2014, **DONALD WALTERS** and **MARIO WALTERS** knowingly participated in a telephonic conversation in which they discussed **MARIO**

**WALTERS** opening the garage door for the arrival of **BOCOOK** and **BAILEY** from Ohio. (TT#5, #00057)

597. On March 1, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a telephonic conversation in which they discussed sending co-conspirator #38 to Tulsa since **BOCOOK** had arrived and continued distribution of narcotics. (TT#5, #00059)

598. On March 2, 2014, **DONALD WALTERS** and **BAILEY** knowingly participated in a telephonic conversation in which they discussed **BAILEY's** return to Ohio in the snow. (TT#5, #00062)

599. On March 2, 2014, **DONALD WALTERS** and co-conspirator #23 knowingly participated in a series of telephonic conversations in which they discussed the distribution of cocaine from co-conspirator #23 to **DONALD WALTERS** and the condition of the roads for the transport of the cocaine. (TT#5, #00067, #00076)

600. On March 2, 2014, **DONALD WALTERS** and **BOCOOK** knowingly participated in a telephonic conversation in which they discussed the trip from Tulsa to Ohio, how the roads are fine to travel and safely transport/distribute narcotics to Ohio. **BOCOOK** told **DONALD WALTERS** it took about 18 hours but they made it. (TT#5, #00077)

601. On March 3, 2014, **DONALD WALTERS** and **BOCOOK** knowingly participated in a telephonic conversation in which they discussed **DONALD**

**WALTERS'** arrival at the Columbus, Ohio airport and that **BOCOOK** would pick him up. (TT#5, #00112)

602. On March 4, 2014, **DONALD WALTERS** and **BOCOOK** knowingly participated in a telephonic conversation in which they discussed **DONALD WALTERS'** flight arrival in Columbus, Ohio, **DONALD WALTERS'** arrival and **BOCOOK's** description of his truck. (TT#5, #00141, #00173, #00175, #00187, #00191)

603. On March 4, 2014, **DONALD WALTERS** travelled in interstate commerce from Tulsa, Oklahoma, to Columbus, Ohio in furtherance of the drug trafficking conspiracy.

604. On May 4, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which they discussed drug distribution and payment. (TT#11, #01359)

605. On May 5, 2014, co-conspirator #23 and **DONALD WALTERS** knowingly participated in a telephonic communication in which **DONALD WALTERS** told co-conspirator #23 he "really needs it" (cocaine) and co-conspirator #23 told **DONALD WALTERS** he would be there (Tulsa) in the morning. (TT#11, #01387)

606. On May 5, 2014, co-conspirator #23 and **GONZALEZ** knowingly participated in a telephonic communication in which they discussed meeting at "the river" and **GONZALEZ** and co-conspirator #23 agreed to leave and meet in two hours to transfer the cocaine. (TT#11, #01399)

607. On May 5, 2014, co-conspirator #23 and **LUCAS** knowingly participated in a telephonic communication in which co-conspirator #23 told **LUCAS** he would be there (Tulsa) early in the morning to avoid traffic. (May 6, 2014) (TT#11, #01438)

608. On January 22, 2014, **DONALD WALTERS** and an unidentified male knowingly participated in a telephonic communication in which they discussed the pending drug distribution to Ohio. **DONALD WALTERS** discussed using different phone numbers and talking with the unidentified male's "partner." (TT#2, #01143)

609. **GONZALEZ** began supplying cocaine to "Tucan" for distribution in Tulsa, Oklahoma since at least May 2010 to May 2014.

610. In approximately October 2010, co-conspirator #23 delivered approximately 1,000 pounds of marijuana to co-conspirator #24 in Tulsa, Oklahoma for \$5,000 U.S. Currency.

611. In approximately November – December 2010, a person introduced co-conspirator #23 to potential marijuana and cocaine customers, **MARIO WALTERS** and **DONALD WALTERS**.

612. From approximately May 2011 – December 2012, a person supplied **DONALD WALTERS** with three to five kilograms of cocaine per week and co-conspirator #23 transported most of the cocaine from Oklahoma City to Tulsa.

613. In about December, 2012, co-conspirator #23 travelled to 6719 East 27th Place, Tulsa, Oklahoma, to collect a drug debt from **DONALD WALTERS**.



614. While collecting the drug debt, **DONALD WALTERS** introduced co-conspirator #23 to **MARIO WALTERS** and **RODNEY PARKER** at 6719 East 27th Place, Tulsa, Oklahoma and asked co-conspirator #23 if he would continue supplying cocaine (“You gonna fuck with me or what?”).

615. After meeting **DONALD WALTERS**, **MARIO WALTERS** and **RODNEY PARKER**, co-conspirator #23 began distributing 3-5 kilograms of cocaine per month to **DONALD WALTERS**.

616. On or about May 2013 **DONALD WALTERS**, **MARIO WALTERS**, **LORELL BATTLE**, **DON WALKER**, **PURIFY**, **RODNEY PARKER** and one unknown black male invited co-conspirator #23 to Las Vegas for a Floyd Mayweather fight.

617. Co-conspirator #23 assisted a person in collecting approximately \$26,000 or \$27,000 for an outstanding drug debt owed by **DONALD WALTERS** to **FNU LNU**, possibly, a/k/a “Tucan”.

618. From in or about October 2012 until on or about June, 2013, co-conspirator #23 distributed cocaine to **DONALD WALTERS**. [worth approximately (\$32k-\$33k per kilogram]

619. From in or about October 2012 until in or about April 2014 **GONZALEZ** supplied and distributed cocaine to co-conspirator #23 worth approximately \$1,960,000 re-distribution to **DONALD WALTERS** in Tulsa, Oklahoma.

620. From in or about July 2013 until in or about May, 2014, co-conspirator #23

distributed approximately 20 kilograms (1-3/month) of cocaine to **DONALD WALTERS**.

621. In approximately December 2013, **MARIO WALTERS** introduced co-conspirator #23 to a cocaine and marijuana customer named **DON WALKER**.

622. In approximately December 2013, **DONALD WALKER** introduced co-conspirator #23 to cocaine and marijuana customer named **PURIFY, LUCAS, and BRUCE**.

623. In approximately January 2014, **PURIFY** introduced co-conspirator #23 to a cocaine and marijuana customer, an unidentified black male in Kansas City.

624. In approximately January 2014, **LUCAS** introduced co-conspirator #23 to his partner person #15.

625. In approximately January 2014, **DON WALKER** introduced co-conspirator #23 to his partner and marijuana customer, co-conspirator #43.

626. In the winter of 2012, co-conspirator #23 travelled to 2301 W. Tecumseh Street, Tulsa, OK on at least two occasions to deliver kilograms of cocaine to **STEWART**.

627. In the winter of 2012, co-conspirator #23 followed **RODNEY PARKER** to 524 E. Tecumseh Street, Tulsa, Oklahoma to collect \$2,000 from **STEWART** for payment of cocaine.

628. From in or about December 2013 to in or about April 2014, co-conspirator #23 distributed approximately 15 kilograms of cocaine and 600 pounds of marijuana to **DON WALKER** in Tulsa, Oklahoma.

629. In approximately December 2013, **DON WALKER** introduced co-conspirator #23 to **BRUCE** as a partner and potential customer of cocaine and marijuana.

630. From in or about, December 2012 to in or about May 2014 co-conspirator #23 distributed 350 pounds of marijuana to **MARIO WALTERS** at various locations, including 7707 East 28th Court, Tulsa, Oklahoma.

631. From in or about October 2012, until in or about April 2014, co-conspirator #23 distributed approximately 12 kilograms of cocaine to **RODNEY PARKER** at 7001 East 77th Street South, Tulsa, Oklahoma.

632. From in or about December 2013, until in or about May 2014, co-conspirator #23 distributed approximately 8-10 kilograms of cocaine and 400 pounds of marijuana to **PURIFY**.

633. From in or about December 2013, until in or about May 2014, co-conspirator #23 distributed or caused to be distributed approximately 700 pounds of marijuana to **BRUCE**.

634. From in or about December 2013, until in or about May 2014, co-conspirator #23 distributed or caused to be distributed approximately 30-40 kilograms of cocaine to **LUCAS** in Tulsa, Oklahoma.

635. In or about October 2013, **DONALD WALTERS** introduced co-conspirator #23 to **BAILEY** as his connect “up north” (Ohio).

636. From in or about October 2013 until in or about May 2014, co-conspirator #23 distributed approximately 3 kilograms of cocaine to **DONALD WALTERS** for redistribution to his “boys up north” from Ohio.

637. In April and May 2014, co-conspirator #23 and **DONALD WALTERS** planned to distribute ten kilograms of cocaine base, a/k/a “crack”, to **DONALD WALTERS**’ customer in Ohio.

638. In May, 2014, co-conspirator #23 contacted family members and an attorney so he could obtain a 1 million peso loan to purchase cocaine for **DONALD WALTERS** and his customer in Ohio.

639. Between October 2012, and May 2014, co-conspirator #23 met **DONALD WALTERS** at 1719 East Oklahoma Street, Tulsa, Oklahoma, on two or three occasions to deliver cocaine and collect drug money.

640. Between October 2012, and May 2014, co-conspirator #23 met **DONALD WALTERS** at 2049 East Woodrow Place, Tulsa, Oklahoma, to distribute cocaine and collect drug money.

641. Between October 2012, and May 2014, co-conspirator #23 met **RODNEY PARKER** and **STEWART** at 2301 West Tecumseh Street, Tulsa, Oklahoma, to distribute cocaine.

642. Between October 2012, and May 2014, co-conspirator #23 met **DONALD WALTERS** at 11011 East 27th Street, Tulsa, Oklahoma on 5-6 occasions to distribute cocaine and obtain drug money.

643. Between October 2012, and May 2014, co-conspirator #23 met **PURIFY** at 9124 East 49th Street, Tulsa, Oklahoma on approximately 3-4 occasions to distribute cocaine and marijuana and to collect drug proceeds.

644. Between October 2012, and May 2014, co-conspirator #23 met **DON WALKER** and/or his wife at 10912 East 36th Street, Tulsa, Oklahoma approximately 3 - 4 times to distribute cocaine and marijuana.

645. In or around October 2011, **LORELL BATTLE** engaged in a gun fight with unknown individuals where he was injured. **LORELL BATTLE** refused to cooperate with law enforcement in order to conceal the relation of the shooting incident to gang related conduct.

646. In or around December 2011, **LORELL BATTLE** and **DONALD WALTERS** travelled on the Will Roger Turnpike. They were shot at by unknown individuals. **LORELL BATTLE** and **DONALD WALTERS** refused to cooperate with law enforcement in order to conceal the relation of the shooting incident to gang related conduct.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(iii)(II), and 841(b)(1)(B)(vii).

**DRUG FORFEITURE ALLEGATION**

**[21 U.S.C. § 853(a)]**

The allegations contained in Count One of this Fifth Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of the drug conspiracy alleged in Count One of this Fifth Superseding Indictment, the defendants, charged in Count One, shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such conspiracy and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the conspiracy, including, but not limited to:

**1. MONEY JUDGMENT**

A sum of money in an amount of at least \$10,000,000, representing proceeds of the drug conspiracy, for which the defendants are jointly and severally liable.

**2. UNITED STATES CURRENCY**

Approximately \$2,085 seized on or about April 3, 2013.

**3. REAL PROPERTY WITH ALL BUILDINGS, IMPROVEMENTS AND APPURTENANCES THEREON**

A. Real property commonly known as 509 E. Tecumseh Street, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Twenty-Three (23) in Block Seven (7) MEADOWBROOK ADDITION to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded Plat thereof.

- B. Real property commonly known as 520 E. Tecumseh Street, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Eighteen (18), Block Eight (8), MEADOWBROOK ADDITION to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded Plat thereof.

- C. Real property commonly known as 524 E. Tecumseh Street, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Seventeen (17), Block Eight (8) MEADOW BROOK ADDITION to the City of Tulsa, Tulsa County, State of Oklahoma according to the recorded Plat thereof.

- D. Real property commonly known as 2049 E. Woodrow Place, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Twelve (12), Block Seven (7), COOTS 2ND ADDITION AMENDED, an addition to the City of Tulsa, Tulsa County, Oklahoma, according to the recorded Plat thereof.

- E. Real property commonly known as 2312 N. Wheeling Avenue, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Eighteen (18), Block Thirteen (13), ROBERTS ADDITION to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded Plat thereof.

- F. Real property commonly known as 1135 N. Boston Place, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Nineteen (19), Block One (1), ADAMS RESUB DIVISION OF BLOCK ONE, THE POWDER AND POMEROY SECOND ADDITION AMENDED, an addition to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded Plat thereof.

- G. Real property commonly known as 1234 N. Olympia, Tulsa, Osage County, Oklahoma, more particularly described as follows, to-wit:

Lot One (1), Block Two (2), COUNTRY CLUB HEIGHTS ADDITION, an addition to the City of Tulsa, Osage County, Oklahoma, according to the recorded Plat thereof.

- H. Real property commonly known as 1214 N. Santa Fe, Tulsa, Osage County, Oklahoma, more particularly described as follows, to-wit:

Lot Five (5), Block Seven (7), COUNTRY CLUB HEIGHTS, an addition to the City of Tulsa, Osage County, State of Oklahoma, according to the recorded Plat thereof.

- I. Real property commonly known as 2301 W. Tecumseh Street, Tulsa, Osage County, Oklahoma, more particularly described as follows, to-wit:

Lot Fifty-Two (52), Block Five (5) GILCREASE HILLS, VILLAGE II, Blocks 4 thru 8, a subdivision in Osage County, State of Oklahoma, according to the recorded Plat thereof.

**4. VEHICLES**

**5. FIREARMS AND AMMUNITION**

- A. One (1) Colt, Model Government Model, .45 auto caliber pistol, serial number W100689;
- B. One (1) Taurus, Model PT92AF, 9mm caliber pistol, serial number obliterated;
- C. One (1) Sig Sauer, Model P239SAS, .40 S&W caliber pistol, serial number SBU021115;
- D. One (1) Glock (GmbH), Model 23, .40 S&W caliber pistol, serial number PXM594;
- E. One (1) Sturm, Ruger & Co., Inc., Model P89, 9mm caliber pistol, serial number 31503116;



- F. Four (4) rounds of CCI (Cascade Cartridge, Inc.) NR .45 auto caliber FMJ ammunition;
- G. Two (2) rounds of Winchester (Olin Corporation) .45 ACP caliber FMJ ammunition;
- H. Ten (10) rounds of Remington Peters 9mm FMJ caliber ammunition;
- I. Six (6) rounds of Winchester (Olin Corporation) 9mm caliber FMJ ammunition;
- J. Two (2) rounds of Winchester (Olin Corporation) 9mm caliber FMJ ammunition;
- K. Forty-eight (48) rounds of CCI (Cascade Cartridge, Inc.) Blazer .40 S&W caliber FMJ ammunition;
- L. Ten (10) rounds of Remington Peters .40 S&W caliber JSW ammunition;
- M. Four (4) rounds of Fiocchi .40 S&W caliber JSW ammunition;
- N. Two (2) rounds of Winchester (Olin Corporation) .40 S&W caliber JSW ammunition;
- O. Two (2) rounds of Speer, .40 S&W JSW ammunition;
- P. One (1) round of Starline .40 S&W caliber JSW ammunition; and
- Q. One (1) round of Federal Cartridge Company .40 S&W caliber JSW ammunition.

Pursuant to Title 21, United States Code, Section 853(p), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or

deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, including but not limited to:

**REAL PROPERTY WITH ALL BUILDINGS, IMPROVEMENTS AND APPURTENANCES THEREON**

- A. Real property commonly known as 543 East 27th Place North, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Sixteen (16), Block One (1), DEVONSHIRE PLACE THIRD ADDITION to the City of Tulsa, Tulsa County, Oklahoma, according to the recorded Plat thereof.

- B. Real property commonly known as 1333 N. Boston Place, Tulsa, Tulsa County, Oklahoma, more particularly described as follows, to-wit:

Lot Five (5), Block Two (2), ADAMS RE-SUBDIVISION OF CLINESS CREST ADDITION to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded Plat thereof.

- C. Real property commonly known as 631 N. Xenophon Avenue, Tulsa, Osage County, Oklahoma, more particularly described as follows, to-wit:

Lot Eighteen (18), Block Ten (10), of Blocks One Thru Ten (10), Inclusive, SKYLINE RIDGE ADDITION to the City of Tulsa, Osage County, State of Oklahoma, according to the recorded Plat thereof.

All pursuant to Title 21, United States Code, Section 853(a).

**COUNT TWO**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)(II)]**

On or about December 1, 2011, in the Northern District of Oklahoma, the defendant, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, did knowingly and intentionally possess with the intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii)(II).

**COUNT THREE**  
**[21 U.S.C. § 856]**

On or about December 1, 2011, in the Northern District of Oklahoma, the defendant, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and others known and unknown, did knowingly and intentionally use and maintain, and cause to be used and maintained, a place located at 1425 East 62nd Street, Apartment B, Tulsa, Oklahoma, for the purpose of storing, distributing, and using cocaine base, also known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

**COUNT FOUR**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)(II)]**

On or about December 14, 2011, in the Northern District of Oklahoma, the defendant, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, did knowingly and intentionally possess with the intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii)(II).

**COUNT FIVE**  
**[21 U.S.C. § 856]**

On or about December 14, 2011, in the Northern District of Oklahoma, the defendant, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and others known and unknown, did knowingly and intentionally use and maintain, and cause to be used and maintained, a place located at 1425 East 62nd Street, Apartment D, Tulsa, Oklahoma, for the purpose of storing, distributing, and using cocaine base, also known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

**COUNT SIX**  
**[18 U.S.C. § 924(c)(1)(A)(i)]**

On or about December 14, 2011, in the Northern District of Oklahoma, the defendant, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, did knowingly possess the following firearms:

1. One (1) Colt, Model Government Model, .45 auto caliber pistol, serial number W100689; and
2. One (1) Taurus, Model PT92AF, 9mm caliber pistol, serial number obliterated,

in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, that is, Possession of Cocaine Base With Intent to Distribute, a violation of Title 21, United States Code, Section 841(a)(1), and Maintaining a Drug Involved Premises, a violation of Title 21, United States Code, Section 856, as more fully set forth in Counts Four and Five of this Fifth Superseding Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT SEVEN**  
**[18 U.S.C. §§ 922(g)(1) and 924(e)(1)]**

On or about December 14, 2011, in the Northern District of Oklahoma, the defendant **LORELL ANTONIO BATTLE**, a/k/a "Lorrel Battle", a/k/a "Lorel Rufus Battle", a/k/a "Rufus Battle", a/k/a "Rufus", a/k/a "Hundred", a/k/a "West", a/k/a "Wes", after having been convicted of the following crimes punishable by imprisonment for terms exceeding one year; to wit:

1. Possession of a Firearm in Commission of a Felony, Case No. CF-2000-3315, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on November 9, 2001;
2. Distribution of a Controlled Substance - Possession with Intent to Distribute, Case No. CF-2003-260, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on September 15, 2003;
3. Assault and Battery on a Police Officer, Case No. CF-2003-2785, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on October 31, 2003;
4. Possession of a Controlled Substance, Case No. CF-2003-3047, in the 14th Judicial District Court of Tulsa, County, State of Oklahoma, on October 8, 2002; and
5. Distribution of a Controlled Substance, Case No. CF-2003-4874, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on October 8, 2002,

did knowingly possess in and effecting interstate commerce the following firearms and ammunition:

1. One (1) Colt, Model Government Model, .45 auto caliber pistol, serial number W100689;



2. Four (4) rounds of CCI (Cascade Cartridge, Inc.) NR .45 auto caliber FMJ ammunition;
3. Two (2) rounds of Winchester (Olin Corporation) .45 ACP caliber FMJ ammunition;
4. One (1) Taurus, Model PT92AF, 9mm caliber pistol, serial number obliterated;
5. Ten (10) rounds of Remington Peters 9mm FMJ caliber ammunition; and
6. Six (6) rounds of Winchester (Olin Corporation) 9mm caliber FMJ ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

**COUNT EIGHT**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)(II)]**

On or about April 3, 2013, in the Northern District of Oklahoma, the defendants, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West”, did knowingly and intentionally possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii)(II).

**COUNT NINE**  
**[21 U.S.C. § 856]**

On or about April 3, 2013, in the Northern District of Oklahoma, the defendants, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West”, did knowingly and intentionally use and maintain a place located at 1329 East 62nd Street, Apartment number 26, Tulsa, Oklahoma, for the purpose of distributing cocaine base, also known as “crack cocaine,” a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TEN**  
**[18 U.S.C. § 924(c)(1)(A)(i)]**

On or about April 3, 2013, in the Northern District of Oklahoma, the defendants, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West”, did knowingly possess the following firearms, to wit:

1. One (1) Sig Sauer, Model P239SAS, .40 S&W caliber pistol, serial number SBU021115;
2. One (1) Glock (GmbH), Model 23, .40 S&W caliber pistol, serial number PXM594; and
3. One (1) Ruger, Model P89, 9mm pistol, serial number 31503116,

in furtherance of drug trafficking crimes for which they may be prosecuted in a court of the United States, that is, Possession of Cocaine Base With Intent to Distribute, a violation of Title 21, United States Code, Section 841(a)(1), and Maintaining a Drug Involved Premises, a violation of Title 21, United States Code, Section 856, as more fully set forth in Counts Eight and Nine of this Fifth Superseding Indictment.

All in violation of Title 21, United States Code, Section 924(c)(1)(A)(i).

**COUNT ELEVEN**  
**[18 U.S.C. §§ 922(g)(1) and 924(e)(1)]**

On or about April 3, 2013, in the Northern District of Oklahoma, the defendant **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, after having been convicted of the following crimes punishable by imprisonment for terms exceeding one year; to wit:

1. Possession of Firearm in Commission of a Felony, Case No. CF-2000-3315, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on November 9, 2001;
2. Distribution of a Controlled Substance - Possession with Intent to Distribute, Case No. CF-2003-260, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on September 15, 2003;
3. Assault and Battery on a Police Officer, Case No. CF-2003-2785, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on October 31, 2003;
4. Possession of a Controlled Substance, Case No. CF-2003-3047, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on October 8, 2002; and
5. Distribution of a Controlled Substance, Case No. CF-2003-4874, in the 14th Judicial District Court of Tulsa County, State of Oklahoma, on October 8, 2002,

did knowingly possess in and effecting interstate commerce the following firearms and ammunition:

1. One (1) Sig Sauer, Model P239SAS, .40 S&W caliber pistol, serial number SBU021115;

2. One (1) Glock (GmnH), Model 23, .40 S&W caliber pistol, serial number PXM594;
3. One (1) Sturm, Ruger & Co., Inc., Model P89, 9mm caliber pistol, serial number 31503116;
4. Two (2) rounds of Winchester (Olin Corporation) 9mm caliber FMJ ammunition;
5. Forty-eight (48) rounds of CCI (Cascade Cartridge, Inc.) Blazer .40 S&W caliber FMJ ammunition;
6. Ten (10) rounds of Remington Peters .40 S&W caliber JSW ammunition;
7. Four (4) rounds of Fiocchi .40 S&W caliber JSW ammunition;
8. Two (2) rounds of Winchester (Olin Corporation) .40 S&W caliber JSW ammunition;
9. Two (2) rounds of Speer, .40 S&W JSW ammunition;
10. One (1) round of Starline .40 S&W caliber JSW ammunition; and
11. One (1) round of Federal Cartridge Company .40 S&W caliber JSW ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

**COUNT TWELVE**  
**[18 U.S.C. §§ 1513(f) and 1513(a)(2)]**

**INTRODUCTION**

At all times relevant to this Fifth Superseding Indictment, unless otherwise stated:

**The Hoover Crips**

1. The Hoover Crips was a criminal organization, commonly referred to as a street gang, whose members and associates engaged in criminal activities in the Northern District of Oklahoma, including the violent crimes of robbery, distribution of controlled substances, and murder committed with the use of firearms.

2. The leaders, members, and associates of the Hoover Crips functioned as a continuing unit for a common purpose to achieve the objectives of the street gang that was engaged in and whose activities affected interstate commerce.

3. The purposes of the Hoover Crips included the following:

a) To unlawfully enrich the members and associates through criminal activities, including robbery and distribution of controlled substances;

b) To preserve and protect the territory and illegal profits of the street gang through intimidation and violent acts such as assaults, threats, and murder.

c) To promote the street gang and enhance the activities of its members and associates; and

d) To suppress the reporting of its criminal activities to law enforcement through threats, intimidation, and retaliation against victims and witnesses.

**The Trial of *United States v. Hill***

4. In or about February 2013 certain known members and associates of the Hoover Crips were tried for robbery and related offenses in the United States District Court for the Northern District of Oklahoma in a case styled and numbered as: *United States v. Hill*, Case No. 12-CR-00050-JHP, hereinafter referred to as the “Hill trial.”

5. Anthony Campbell, a witness for the United States in the Hill trial, gave testimony describing criminal activities by certain members and associates of the Hoover Crips.

6. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES**, defendants herein, were members and associates of the Hoover Crips.

7. A report by a Special Agent of the Federal Bureau of Investigation, usually referred to a “FBI 302”, contained details of certain statements made by Anthony Campbell to law enforcement, and was disclosed as a part of the discovery prior to the commencement of the Hill trial. That FBI 302 included statements by Anthony Campbell identifying criminal acts, including murder, allegedly committed by **LORRELL ANTONIO BATTLE**. The FBI 302 also identified other persons as having been involved in crimes.



### THE CONSPIRACY

8. Beginning as early as in or about July 2012, and continuing thereafter until sometime in or about the Spring of 2013, including April 3, 2013, more certain dates being unknown to the grand jury, the defendants, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West”, and **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, did knowingly conspire, confederate, and agree together, each with the other, and with others known and unknown with the intent to retaliate against Anthony Campbell for attending an official proceeding as a witness, a violation of Title 18, United States Code, Section 1513(a)(1)(A), and for providing to a federal law enforcement officer information relating to the commission and possible commission of federal offenses, a violation of Title 18, United States Code, Section 1513(a)(1)(B), to kill the said Anthony Campbell with malice aforethought through the use of a firearm, which killing would be and was murder as defined by Title 18, United States Code, Section 1111, that is, the knowing, willful, deliberate, malicious, and premeditated shooting of Anthony Campbell with a firearm, thus to cause his death.

## MEANS AND METHODS OF THE CONSPIRACY

The means and methods by which the defendants and their co-conspirators sought to accomplish the conspiracy included, among others, the following:

9. **LORELL ANTONIO BATTLE** would and did obtain copies of the FBI 302 that identified members and associates of the Hoover Crips and the crimes they committed.

10. **LORELL ANTONIO BATTLE** would and did identify Anthony Campbell as the source of the statements in the FBI 302.

11. **LORELL ANTONIO BATTLE** with another person known to the Grand Jury agreed that Anthony Campbell needed to be dealt with. **LORELL ANTONIO BATTLE** stated to a person known to the Grand Jury and in the presence of **GAYWONE BLADES** "We got to get this snitching ass nigga", followed by "He done us wrong".

12. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES** would and did obtain firearms and ammunition to use in unlawful activities of the Hoover Crips including retaliating against Anthony Campbell for being a witness in the Hill trial and for providing information to law enforcement about street gang activities and other crimes.

13. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES** would and did obtain a vehicle to use in retaliating against Anthony Campbell.

14. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES** would and did obtain the address of Anthony Campbell and drive to that location.

15. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES** would and did park near Anthony Campbell's residence.

16. **LORELL ANTONIO BATTLE** would and did approach Anthony Campbell and shoot him approximately thirteen times at close range with the 9mm semi-automatic pistol, described more fully in Count Fourteen.

17. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES** would and did flee the murder scene in the vehicle and return it to its owner where **LORELL ANTONIO BATTLE** hid the vehicle in the owner's garage.

18. **LORELL ANTONIO BATTLE** and **GAYWONE DEKEITH BLADES** would and did retreat to an apartment located at 1329 East 62nd Street, apartment number 26, Tulsa, Oklahoma, where they hid and stored clothing and the murder weapon.

All in violation of Title 18, United States Code, Sections 1513(f) and 1513(a)(2).

**COUNT THIRTEEN**  
**[18 U.S.C. §§ 1513(a)(1)(A), 1513(a)(1)(B), and 1513(a)(2)]**

The allegations contained in paragraphs One through Seven of Count 12 of this Fifth Superseding Indictment are hereby realleged and incorporated as if fully set forth herein.

On or about April 3, 2013, in the Northern District of Oklahoma, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes”, and **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West” the defendants herein, with the intent to retaliate against Anthony Campbell for attending an official proceeding as a witness and for providing to a Federal law enforcement officer information relating to the commission or possible commission of Federal offenses, did kill Anthony Campbell, with malice aforethought, through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111, by knowingly, willfully, deliberately, maliciously and with premeditation, shooting Anthony Campbell with a firearm, thus causing his death.

All in violation of Title 18, United States Code, Sections 1513(a)(1)(A), 1513(a)(1)(B) and 1513(a)(2).

**COUNT FOURTEEN**  
**[18 U.S.C. §§ 924(c)(1)(A)(iii) and 924(j)(1)]**

On or about April 3, 2013, in the Northern District of Oklahoma, the defendants, **LORELL ANTONIO BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes” and **GAYWONE DEKEITH BLADES**, a/k/a “Junior Blades”, a/k/a “Lil Gator Blades”, a/k/a “Kawone Blades”, a/k/a “Kawone Shills”, a/k/a “Gaywone Shills”, a/k/a “Kawone Shields”, a/k/a “Baby West Blades”, a/k/a “Gator”, a/k/a “Lil West”, the defendants herein, did knowingly use and discharge a firearm, that is, a Ruger, Model P89, 9mm pistol, serial number 31503116, during and in relation to a crime of violence, which caused the murder of Anthony Campbell through the use of a firearm, for which they may be prosecuted in a court of the United States, to wit: retaliation against a witness and informant in violation of Title 18, United States Code, Sections 1513(a)(1)(A) and 1513(a)(1)(B), as charged in Count Thirteen, of this Fifth Superseding Indictment which is re-alleged and incorporated by reference herein.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 924(j)(1).

## NOTICE OF SPECIAL FINDINGS AS TO DEFENDANT LORELL BATTLE

The Grand Jury incorporates by reference the allegations contained in Counts Twelve, Thirteen and Fourteen of this Fifth Superseding Indictment and makes the following special findings as to Counts Twelve, Thirteen and Fourteen for defendant Lorell Battle. Lorell Battle,

- a. was 18 years of age or older at the time of the offenses [Title 18, United States Code, Section 3591(a)];
- b. intentionally killed the victim, Anthony Campbell [Title 18, United States Code, Section 3591(a)(2)(A)];
- c. intentionally inflicted serious bodily injury that resulted in the death of victim, Anthony Campbell;
- d. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim, Anthony Campbell, died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(C)]; and
- e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life, and the victim, Anthony Campbell, died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)].

**COUNT FIFTEEN**  
**[21 U.S.C. §§ 848(a), 848(b), 848(c), and 848(d)]**

Beginning in or around April 2012, the exact date being unknown, to on or about the date of this Fifth Superseding Indictment, in the Northern District of Oklahoma and elsewhere, the defendant, **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, did knowingly and intentionally engage in a continuing criminal enterprise in that he unlawfully, knowingly, and intentionally violated Title 21, United States Code, Sections 841, 843, 846, 848(b)(1) and (2)(A), 856(a)(1) which violations include, but are not limited to, the substantive violations and overt acts alleged in Count One, Count Nineteen, Count Twenty, Count Twenty-Four, Count Twenty-Five, Count Twenty-Eight, Count Thirty-Two, Count Eighty-Nine, Count Ninety to Count Ninety-Three, Count Ninety-Five to Count One Hundred and Two, Count One Hundred and Six to One Hundred and Twenty-Seven, Count One Hundred and Thirty-Two to One Hundred and Forty-Six, Count One Hundred and Sixty, Count One Hundred and Sixty-Two, Count One Hundred and Sixty-Five, Count One Hundred and Sixty-Nine, Count One Hundred and Seventy-One, Count One Hundred and Eighty-Six to One Hundred and Eighty-Nine, Count One Hundred and Ninety-Two to One Hundred and Ninety-Four, Count One Hundred and Ninety-Six to One Hundred and Ninety-Seven, Count Two Hundred and Two to Two Hundred and Fourteen, Count Two Hundred and Nineteen, Count Two Hundred and Twenty-One to Two Hundred and Twenty-Five, Count Two Hundred and Twenty-Seven, Count Two Hundred and Thirty-

One to Two Hundred and Thirty-Two, and Count Two Hundred and Thirty-Four, which are realleged and incorporated herein as though fully set forth in this count, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, et seq., undertaken by defendant **DONALD WALTERS**, in concert with at least five other persons with respect to whom, **DONALD WALTERS**, occupied positions of organizer, supervisor, and any position of management, and from which such continuing search of violations the defendant obtained substantial income or resources.

Furthermore, the defendant, **DONALD WALTERS**, was a principal administrator, organizer, or supervisor and leader of the criminal enterprise, which involved possession with intent to distribute and distribution of mixture and substances containing a detectable amount of cocaine base, commonly referred to as "crack", a Schedule II controlled substance, and the amount of said mixture and substance was 300 times the quantity of the substance listed in Title 21, United States Code, Section 841(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Sections 848(a), 848(b), 848(c) and 848(d).



**COUNT SIXTEEN**  
**[21 U.S.C. § 856]**

From in or between January 2013 to December 2013, in the Northern District of Oklahoma, the defendants, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, **JAMAR STEWART**, a/k/a “J”, **RODNEY PARKER**, a/k/a “Shrek”, a/k/a “Parks”, a/k/a “R.P.”, **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, a/k/a “RB”, did knowingly and intentionally use a place located at 524 E. Tecumseh Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT SEVENTEEN**  
**[21 U.S.C. § 856]**

From in or between January 2013 to December 2013, in the Northern District of Oklahoma, the defendants, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, **JAMAR STEWART**, a/k/a “J”, did knowingly and intentionally use a place located at 520 E. Tecumseh Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT EIGHTEEN**

**[21 U.S.C. § 856]**

From in or between January 2013 to December 2013, in the Northern District of Oklahoma, the defendants, **JAMAR BOWENS, JAMAR STEWART**, a/k/a “J”, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally use a place located at 509 E. Tecumseh Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT NINETEEN**  
**[21 U.S.C. § 856]**

From in or between June 2013 to August 2013, in the Northern District of Oklahoma, the defendants, **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, a/k/a “RB”, **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, **AUBREY CARWILE**, a/k/a “Traffic”, did knowingly and intentionally use a place located at 1135 N. Boston Place, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY**  
**[21 U.S.C. § 856]**

From in or between January 2013 to May 2014, in the Northern District of Oklahoma, the defendants, **MARIO WALTERS**, a/k/a “Rio” and **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, did knowingly and intentionally use a place located at 7707 E. 28th Court, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-ONE**  
**[21 U.S.C. § 856]**

From in or between December 2013 to May 2014, in the Northern District of Oklahoma, the defendants, **JAMAR STEWART**, a/k/a “J” and **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally use a place located at 1234 N. Olympia, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-TWO**  
**[21 U.S.C. § 856]**

From in or between December 2013 to May 2014, in the Northern District of Oklahoma, the defendants, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy” and **JAMAR STEWART**, a/k/a “J”, did knowingly and intentionally use a place located at 1214 N. Santa Fe, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-THREE**  
**[21 U.S.C. § 856]**

From in or between October 2013 to May 2014, in the Northern District of Oklahoma, the defendant, **DONYALE STANCLE**, a/k/a “Boo”, did knowingly and intentionally use a place located at 1719 E. Oklahoma Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.



**COUNT TWENTY-FOUR**  
**[21 U.S.C. § 856]**

From in or between December 2013 to May 2014, in the Northern District of Oklahoma, the defendant, **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, did knowingly and intentionally use a place located at 11011 E. 27th Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-FIVE**  
**[21 U.S.C. § 856]**

From in or between September 2013 to January 2014, in the Northern District of Oklahoma, the defendant, **DIANE WALTERS**, did knowingly and intentionally use a place located at 2049 E. Woodrow Place, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-SIX**  
**[21 U.S.C. § 856]**

From in or between September 2013 to May 2014, in the Northern District of Oklahoma, the defendant, **RODNEY PARKER**, a/k/a “Shrek”, a/k/a “Parks”, a/k/a “R.P.”, did knowingly and intentionally use a place located at 7001 E. 77th Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-SEVEN**  
**[21 U.S.C. § 856]**

From in or between December 2013, in the Northern District of Oklahoma, the defendant, **DON WALKER**, did knowingly and intentionally use a place located at 2124 E. Concord Street, Broken Arrow, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-EIGHT**  
**[21 U.S.C. § 856]**

From in or between January 2013 to December 2013, in the Northern District of Oklahoma, the defendant, **DONALD WALTERS**, did knowingly and intentionally use a place located at 2312 N. Wheeling Avenue, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT TWENTY-NINE**  
**[21 U.S.C. § 856]**

From in or between June 2013 to December 2013, in the Northern District of Oklahoma, the defendant, **JAMAR STEWART**, a/k/a “J”, did knowingly and intentionally use a place located at 2301 W. Tecumseh Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT THIRTY**  
**[21 U.S.C. § 856]**

From in or between September 2013 to May 2014, in the Northern District of Oklahoma, the defendant, **CHANTZ LUCAS**, did knowingly and intentionally use a place located at 8434 N. 67th East Avenue, Owasso, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT THIRTY-ONE**  
**[21 U.S.C. § 856]**

From in or between September 2013 to May 2014, in the Northern District of Oklahoma, the defendant, **CORRY PURIFY**, did knowingly and intentionally use a place located at 2756 S. 114th East Avenue, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.



**COUNT THIRTY-TWO**  
**[21 U.S.C. § 856]**

From in or between September 2013 to May 2014, in the Northern District of Oklahoma, the defendant, **CORRY PURIFY**, did knowingly and intentionally use a place located at 9124 East 49th Street, Tulsa, Oklahoma, for the purpose of manufacturing and distributing cocaine base, a/k/a “crack”, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856.

**COUNT THIRTY-THREE**  
**[18 U.S.C. § 371 and 7 U.S.C. § 2156(b)]**

Beginning in or about 2011 and continuing until the date of this Fifth Superseding Indictment in the Northern District of Oklahoma and elsewhere, defendants **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty” (**DONALD WALTERS**), **DOYLE BROWN (BROWN)**, **JAMAR STEWART**, a/k/a “J” (**STEWART**), **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy” (**KENYA WALKER**), **LORELL BATTLE**, a/k/a “Lorrel Battle”, a/k/a “Lorel Rufus Battle”, a/k/a “Rufus Battle”, a/k/a “Rufus”, a/k/a “Hundred”, a/k/a “West”, a/k/a “Wes” (**LORELL BATTLE**), did knowingly and willfully combine, conspire, confederate and agree with each other, and with a persons known and unknown to the Grand Jury, to count the following offenses against the United States, to wit:

1. To knowingly sponsor and exhibited an animal in an animal fighting venture, if any animal in the venture has moved in interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1); and

2. To knowingly buy, transport, deliver and receive for purposes of transportation, in interstate commerce, any dog for purposes of having the dog participated in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b).

## MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that the defendants and their co-conspirators would and did:

1. Purchase pit bulls for use in dog fighting competitions.
2. Train and breed pit bulls for participating in dog fighting competitions.
3. Travel to other locations in interstate commerce to participate in dog fighting competitions.
4. Sponsor and exhibit dogs in animal fighting competitions in interstate commerce involving dogs that have moved across state line.
5. Provide funding for the expenses associated with an animal fighting venture, including, food, medicine, moving expenses and entrance fees for dog fighting competitions.
6. Develop pit bulls fighting ability by letting the fighting prowess of dogs, providing veterinary treatment for injured dogs and destroying, or otherwise disposing of dogs deemed unfit for fighting or continued fighting.

## OVERT ACTS

In furtherance of the conspiracy and to effect the objects there of, at least one of the following overt acts, among others, was committed by the defendants and other co-conspirators in the Northern District of Oklahoma and elsewhere;

1. On December 15, 2013, **KENYA WALKER** and **BROWN** had a telephone conversation regarding dog fighting or preparation for dog fighting.

2. On December 15, 2013, **KENYA WALKER** and **DONALD WALTERS** had a conversation regarding dog fighting or preparation for dog fighting.
3. On December 15, 2013, **KENYA WALKER** and **DONALD WALTERS** had a conversation regarding dog fighting or preparation for dog fighting.
4. On December 15, 2013, **KENYA WALKER** and **BROWN** had a conversation regarding dog fighting or preparation for dog fighting.
5. On December 15, 2013, **KENYA WALKER** and **DONALD WALTERS** had a conversation regarding dog fighting or preparation for dog fighting.
6. On December 15, 2013, **KENYA WALKER** and co-conspirator #12 had a conversation regarding dog fighting or preparation for dog fighting.
7. On December 16, 2013, **DONALD WALTERS** and **KENYA WALKER** and had a conversation regarding dog fighting or preparation for dog fighting.
8. On December 16, 2013, **DONALD WALTERS** and **KENYA WALKER** and had a conversation regarding dog fighting or preparation for dog fighting.
9. On December 16, 2013, **STEWART** and **KENYA WALKER** and had a conversation regarding dog fighting or preparation for dog fighting.
10. On December 16, 2013, **DONALD WALTERS** and **KENYA WALKER** and had a conversation regarding dog fighting or preparation for dog fighting.
11. On December 27, 2013, **KENYA WALKER** and **DONALD WALTERS** had a conversation regarding dog fighting or preparation for dog fighting.

12. On December 27, 2013, **KENYA WALKER** and **STEWART** had a conversation regarding dog fighting or preparation for dog fighting.

13. On December 27, 2013, **KENYA WALKER** and **BROWN** had a conversation regarding dog fighting or preparation for dog fighting.

14. On January 12, 2014, **KENYA WALKER** and **STEWART** had a conversation regarding dog fighting or preparation for dog fighting.

15. On January 12, 2014, **KENYA WALKER** and **BROWN** had a conversation regarding dog fighting or preparation for dog fighting.

16. On January 13, 2014, **KENYA WALKER** and **BROWN** had a conversation regarding dog fighting or preparation for dog fighting.

17. On January 21, 2014, **KENYA WALKER** and **STEWART** had a conversation regarding dog fighting or preparation for dog fighting.

18. On January 21, 2014, **DONALD WALTERS** and **TERRELL LNU** had a conversation regarding dog fighting or preparation for dog fighting.

19. On January 27, 2014, **DONALD WALTERS** and **TERRELL LNU** had a conversation regarding dog fighting or preparation for dog fighting.

20. On February 18, 2014, **DONALD WALTERS** and **TERRELL LNU** had a conversation regarding dog fighting or preparation for dog fighting.

During 2012, exact date unknown, **DONALD WALTERS** directed a person known to the Grand Jury to feed and water dogs that were to be used in fighting.

During 2012, **DONALD WALTERS** caused others known to the Grand Jury to travel from the state of Oklahoma to other states including Louisiana with dogs owned by **DONALD WALTERS** and others to participate in dog fighting competitions where gambling and opportunity for purse winning were available.

On or about **DONALD WALTERS** and **KENYA WALKER** conducted a training fight at 520 E. Tecumseh Street, Tulsa, Oklahoma in the Northern District of Oklahoma where dogs were pitted against each other to see if they were ready to fight in dog fighting competitions.

All in violation of Title 18, United States Code, Section 371.

**COUNT THIRTY-FOUR**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about July 11, 2013, in the Northern District of Oklahoma, the defendant, **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THIRTY-FIVE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about July 18, 2013, in the Northern District of Oklahoma, the defendants, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, and **JAMAR STEWART**, a/k/a “J”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).



**COUNT THIRTY-SIX**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about July 25, 2013, in the Northern District of Oklahoma, the defendant, **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THIRTY-SEVEN**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about July 26, 2013, in the Northern District of Oklahoma, the defendant, **JAMAR STEWART**, a/k/a “J”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THIRTY-EIGHT**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about August 2, 2013, in the Northern District of Oklahoma, the defendant, **JAMAR STEWART**, a/k/a “J”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THIRTY-NINE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about August 5, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about August 8, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-ONE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about August 22, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY TWO**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about August 22, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-THREE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about August 27, 2013, in the Northern District of Oklahoma, the defendant, **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).



**COUNT FORTY-FOUR**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about September 4, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-FIVE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about October 10, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-SIX**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about October 21, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-SEVEN**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about November 25, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-EIGHT**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about December 19, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-NINE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]**

On or about December 28, 2013, in the Northern District of Oklahoma, the defendant, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, did knowingly and intentionally possess with the intent to distribute and distribute cocaine base, a/k/a “crack”, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FIFTY**  
**[18 U.S.C. § 924(o)]**

On or about March 28, 2014, in the Northern District for Oklahoma, **MARIO WALTERS**, a/k/a “Rio”, **ADRIAN CAMPBELL**, a/k/a “Baby Co”, **MICHAEL WASHINGTON**, and **CHERYL RYANS**, the defendants herein, together, did knowingly, and intentionally combine, conspire and agree to violate Title 18, United States Code, Section 924(c); Possession of a Firearm in Furtherance of and During and in Relation to a Crime of Violence, in violation of Title 18, United States Code, Section 924(o).

**COUNTS FIFTY-ONE THROUGH TWO HUNDRED AND THIRTY-EIGHT**  
**[21 U.S.C. § 843(b)]**

On or about the dates listed below, in the Northern District of Oklahoma, the defendants **ROBERT PEARSON**, a/k/a “Pookie”, a/k/a “Pookie D”, **DEMONN PARKER**, a/k/a “Nephew”, a/k/a “Vic”, a/k/a “Running Back”, a/k/a “RB”, **KENYA WALKER**, a/k/a “Ken Yo”, a/k/a “K.Y.”, a/k/a “Big Sleepy”, **TONY LAGRONE**, **JAMAR STEWART**, a/k/a “J”, **KEWON NEWTON**, **CLARENCE REED**, a/k/a “Unc”, **MICHAEL DEWAYNE WASHINGTON**, a/k/a “Mike Seals”, a/k/a Big Mike”, **DONYALE STANCLÉ**, a/k/a “Boo”, **DONALD WALTERS**, a/k/a “Lil D”, a/k/a “Donald Grey”, a/k/a “Deezy”, a/k/a “Little Shitty”, **JOHN D. WASHINGTON**, a/k/a “J.D.”, **DARON HARRIS**, a/k/a “P Rock”, **MYRON MARZETT**, a/k/a “Gizmo”, **DEMARCUS JOHNSON**, a/k/a “Mac-10”, a/k/a “Kain”, **DEON DELOUISER**, **MICHAEL TINSLEY**, **CHADRICK COLBERT**, **RODNEY PARKER**, a/k/a “Shrek”, a/k/a “Parks”, a/k/a “R.P.”, **TERRY BOCOOK**, **SHABOHEAM BAILEY**, **AUBREY CARWILE**, a/k/a “Traffic”, **MARCOS CERECERES**, a/k/a “Marcos”, **DON WALKER**, a/k/a “Chucky”, **MARIO WALTERS**, a/k/a “Rio”, **CORRY PURIFY**, **SERGIO GONZALEZ**, a/k/a “El Don”, **CHANTZ LUCAS**, a/k/a “Beard”, **BRENDA WALKER**, **DIANE WALTERS**, **HARRIENE HALE**, a/k/a “Tisha Hale”, a/k/a “Big Package”, **HIRAM STANCLÉ**, a/k/a “Dean”, and others known to the Grand Jury, knowingly and intentionally, and unlawfully used a communication facility, that is telephones (cellular or otherwise), in committing, causing, and facilitating acts



constituting felonies under Title 21, United States Code, Section 841 and 846, in that the defendants used the telephones to discuss various matters concerning conspiracy to possess with intent to distribute and distribute cocaine and cocaine base commonly referred to as “crack”, Schedule II controlled substances, and conspiracy to possess with intent to distribute and distribute marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 843(b) as set forth in the chart below:

<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
51	6/26/2013	Consent	CC #1	Cocaine	Robert Pearson
52	6/26/2013	Consent	CC #2	Cocaine	Robert Pearson
53	6/26/2013	Consent	CC #3	Cocaine	Robert Pearson
54	7/30/2014	Consent	CC #6	Cocaine	Demonn Parker
55	7/30/2014	Consent	CC #7	Cocaine	Demonn Parker
56	8/27/2013	Consent	CC #8	Cocaine	Demonn Parker
57	8/27/2013	Consent	CC #9	Cocaine	Demonn Parker
58	8/27/2013	Consent	CC #10	Cocaine	Demonn Parker
59	10/21/2013	Consent	CC #12	Cocaine	Kenya Walker
60	10/21/2013	Consent	CC #13	Cocaine	Kenya Walker
61	11/25/2013	Consent	CC #16	Cocaine	Kenya Walker
62	11/25/2013	Consent	CC #17	Cocaine	Kenya Walker
63	12/14/2013	TT#1	00256	Cocaine	Kenya Walker Tony Lagrone
64	12/14/2013	TT#1	00262	Cocaine	Kenya Walker Tony Lagrone
65	12/14/2013	TT#1	00272	Cocaine	Kenya Walker Tony Lagrone
66	12/14/2013	TT#1	00291	Cocaine	Jamar Stewart Kenya Walker
67	12/15/2013	TT#1	00399	Cocaine	Kenya Walker Kewon Newton
68	12/15/2013	TT#1	00418	Cocaine	Kenya Walker Kewon Newton
69	12/15/2013	TT#1	00444	Cocaine	Kenya Walker Jamar Stewart

<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
70	12/17/2013	TT#1	00693	Cocaine	Kenya Walker Clarence Reed
71	12/19/2013	TT#1	01013	Cocaine	Kenya Walker
72	12/19/2013	TT#1	01024	Cocaine	Kenya Walker
73	12/19/2013	TT#1	01051	Cocaine	Kenya Walker
74	12/23/2013	TT#1	01853	Cocaine	Kenya Walker Tony Lagrone
75	12/26/2013	TT#1	02355	Cocaine	Kenya Walker Tony Lagrone
76	12/28/2013	TT#1	02671	Cocaine	Kenya Walker Clarence Reed
77	12/30/2013	TT#1	03057	Cocaine	Kenya Walker Kewon Newton
78	12/30/2013	TT#1	03130	Cocaine	Kenya Walker Kewon Newton
79	12/31/2013	TT#1	03200	Cocaine	Kenya Walker Kewon Newton
80	12/31/2014	TT#1	03240	Cocaine	Kenya Walker Kewon Newton
81	1/1/2014	TT#1	03351	Cocaine	Kenya Walker Michael Washington
82	1/3/2014	TT#1	03642	Cocaine	Kenya Walker Kewon Newton
83	1/6/2014	TT#1	04256	Cocaine	Kenya Walker Kewon Newton
84	1/9/2014	TT#1	04781	Cocaine	Kenya Walker Tony Lagrone
85	1/9/2014	TT#1	04792	Cocaine	Kenya Walker Tony Lagrone
86	1/18/2014	TT#3	00450	Cocaine	Donyale Stancle Jamar Stewart
87	1/18/2014	TT#3	00489	Cocaine	Donyale Stacle Kenya Walker
88	1/21/2014	TT#1	06539	Cocaine	Kenya Walker Brenda Walker
89	1/21/2014	TT#2	00921	Cocaine	Donald Walters Myron Marzett

<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
90	1/22/2014	TT#2	01141	Marijuana	Donald Walters John Washington
91	1/22/2014	TT#2	01167	Marijuana	Donald Walters Daron Harris
92	1/22/2014	TT#2	01169	Cocaine	Donald Walters Myron Marzett
93	1/23/2014	TT#2	01582	Cocaine	Donald Walters Myron Marzett
94	1/24/2014	TT#3	01595	Cocaine	Donyale Stancle Demarcus Johnson
95	1/24/2014	TT#2	01749	Cocaine	Donald Walters Deon Delouiser
96	1/24/2014	TT#2	01755	Cocaine	Donald Walters Deon Delouiser
97	1/24/2014	TT#2	01841	Marijuana	Donald Walters John Washington
98	1/24/2014	TT#2	01870	Cocaine	Donald Walters Michael Tinsley
99	1/25/2014	TT#2	01889	Cocaine	Donald Walters Michael Tinsley
100	1/25/2014	TT#2	01957	Cocaine	Donald Walters Chadrick Colbert
101	1/25/2014	TT#2	01972	Cocaine	Donald Walters Chadrick Colbert
102	1/25/2014	TT#2	01975	Cocaine	Donald Walters Chadrick Colbert
103	1/25/2014	TT#3	01800	Marijuana	Donyale Stancle John Washington
104	1/25/2014	TT#3	01808	Cocaine	Donyale Stancle Demarcus Johnson
105	1/26/2014	TT#3	02070	Marijuana	Donyale Stancle
106	1/26/2014	TT#2	02170	Cocaine	Donald Walters Daron Harris
107	1/26/2014	TT#2	02171	Cocaine Marijuana	Donald Walters Myron Marzett
108	1/26/2014	TT#2	02194	Cocaine	Donald Walters Demarcus Johnson

<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
109	1/27/2014	TT#2	02307	Cocaine	Donald Walters Chadrick Colbert
110	1/27/2014	TT#2	02318	Cocaine	Donald Walters Chadrick Colbert
111	1/27/2014	TT#2	02378	Marijuana	Donald Walters John Washington
112	1/27/2014	TT#2	02392	Marijuana	Donald Walters John Washington
113	1/28/2014	TT#2	02512	Marijuana	Donald Walters Demonn Parker
114	1/28/2014	TT#2	02534	Marijuana	Donald Walters
115	1/28/2014	TT#2	02564	Marijuana	Donald Walters John Washington
116	1/28/2014	TT#2	02569	Cocaine	Donald Walters Demarcus Johnson
117	1/30/2014	TT#2	02871	Marijuana	Donald Walters Daron Harris
118	2/1/2014	TT#2	03263	Cocaine	Donald Walters Jamar Stewart
119	2/2/2014	TT#2	03554	Cocaine	Donald Walters Myron Marzett
120	2/2/2014	TT#2	03629	Cocaine	Donald Walters Chadrick Colbert
121	2/3/2014	TT#2	03778	Marijuana	Donald Walters Rodney Parker
122	2/3/2014	TT#2	03806	Cocaine	Donald Walters Michael Tinsley
123	2/4/2014	TT#2	03973	Cocaine	Donald Walters Demonn Parker
124	2/4/2014	TT#2	04048	Marijuana	Donald Walters Rodney Parker
125	2/7/2014	TT#2	04546	Marijuana Cocaine	Donald Walters Diane Walters
126	2/8/2014	TT#2	04637	Marijuana	Donald Walters Rodney Parker
127	2/15/2014	TT#2	05889	Cocaine	Donald Walters Donyale Stancle

<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
128	2/20/2014	TT#4	00316	Cocaine	Donyale Stancle Jamar Stewart
129	2/20/2014	TT#4	00319	Cocaine	Donyale Stancle Jamar Stewart
130	2/20/2014	TT#4	00321	Cocaine	Donyale Stancle Donald Walters
131	2/25/2014	TT#4	00473	Cocaine	Donyale Stancle Jamar Stewart
132	2/28/2014	TT#5	00027	Cocaine	Donald Walters Terry Bocook
133	2/28/2014	TT#5	00040	Marijuana	Donald Walters Daron Harris
134	3/1/2014	TT#5	00053	Cocaine	Donald Walters Michael Tinsley
135	3/1/2014	TT#5	00059	Cocaine	Donald Walters
136	3/2/2014	TT#5	00056	Cocaine	Donald Walters Shaboheam Bailey
137	3/2/2014	TT#5	00058	Cocaine	Donald Walters Shaboheam Bailey
138	3/3/2014	TT#5	00119	Cocaine	Donald Walters
139	3/4/2014	TT#5	00144	Cocaine	Donald Walters
140	3/4/2014	TT#5	00145	Cocaine	Donald Walters Michael Tinsley
141	3/4/2014	TT#5	00173	Cocaine	Donald Walters Terry Bocook
142	3/5/2014	TT#5	00208	Cocaine	Donald Walters Aubrey Carwile
143	3/6/2014	TT#2	08944	Cocaine	Donald Walters Myron Marzett
144	3/6/2014	TT#5	00227	Cocaine	Donald Walters
145	3/6/2014	TT#5	00233	Cocaine	Donald Walters Mario Walters
146	3/6/2014	TT#5	00234	Cocaine	Donald Walters Aubrey Carwile
147	3/27/2014	TT#8	000246	Cocaine	Marcos Cereceres Don Walker
148	3/30/2014	TT#8	00336	Cocaine	Marcos Cereceres Don Walker

COUNT	DATE	TARGET PHONE	SESSION	DRUG INVOLVED	DEFENDANT(S)
149	3/30/2014	TTT#8	00339	Cocaine	Marcos Cereceres Don Walker
150	3/27/2014	TT#7	00260	Cocaine	Mario Walters Diane Walters
151	3/27/2014	TT#8	00283	Cocaine	Marcos Cereceres Don Walker
152	3/28/2014	TT#7	00441	Marijuana	Mario Walters Michael Washington
153	3/29/2014	TT#7	00561	PCP	Mario Walters Corry Purify
154	3/29/2014	TT#7	00596	Cocaine	Mario Walters FNU LNU #1
155	3/30/2014	TT#7	00708	Cocaine	Mario Walters FNU LNU #1
156	4/2/2014	TT#7	01078	Marijuana	Mario Walters Aubrey Carwile
157	4/2/2014	TT#8	00393	Cocaine	Marcos Cereceres Sergio Gonzalez
158	4/4/2014	TT#7	01480	Cocaine	Mario Walters
159	4/4/2014	TT#7	01593	Cocaine	Mario Walters FNU LNU #1
160	4/4/2014	TT#9	00296	Cocaine	Donald Walters Deon Delouiser
161	4/5/2014	TT#8	00511	Marijuana	Marcos Cereceres
162	4/5/2014	TT#9	00383	Marijuana	Donald Walters Michael Tinsley
163	4/5/2014	TT#7	01671	Cocaine	Mario Walters FNU LNU #1
164	4/5/2014	TT#7	01759	Cocaine	Mario Walters FNU LNU #1
165	4/6/2014	TT#9	00517	Cocaine	Donald Walters Terry Bocoook
166	4/6/2014	TT#7	01828	Cocaine	Mario Walters FNU LNU #1
167	4/6/2014	TT#7	01876	Cocaine	Mario Walters FNU LNU #1
168	4/7/2014	TT#8	00591	Cocaine	Don Walker

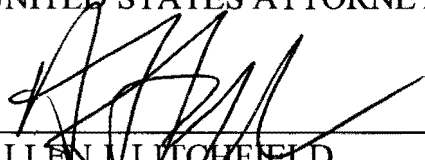
<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
169	4/7/2014	TT#9	00544	Marijuana	Donald Walters Chadrick Colbert
170	4/8/2014	TT#8	00723	Marijuana	Don Walker
171	4/8/2014	TT#9	00589	Cocaine	Donald Walters
172	4/9/2014	TT#7	02231	Cocaine	Mario Walters
173	4/9/2014	TT#7	02302	Cocaine	Mario Walters Harriene Hale
174	4/9/2014	TT#8	00759	Cocaine	Sergio Gonzalez
175	4/9/2014	TT#8	00763	Cocaine	Corry Purify
176	4/9/2014	TT#8	00771	Cocaine	Don Walker
177	4/9/2014	TT#8	00775	Cocaine	Corry Purify
178	4/9/2014	TT#8	00801	Cocaine	Sergio Gonzalez
179	4/10/2014	TT#7	02319	Cocaine	Mario Walters Corry Purify
180	4/10/2014	TT#7	02325	Cocaine Marijuana	Mario Walters Harriene Hale
181	4/10/2014	TT#7	02332	Cocaine Marijuana	Mario Walters Harriene Hale
182	4/10/2014	TT#7	02401	Cocaine	Mario Walters FNU LNU #1
183	4/10/2014	TT#8	00884	Cocaine	Marcos Cereceres
184	4/11/2014	TT#7	02488	Cocaine	Mario Walters Michael Washington
185	4/12/2014	TT#7	02674	Cocaine	Mario Walters
186	4/12/2014	TT#9	00930	Cocaine	Donald Walters Deon Delouiser
187	4/12/2014	TT#9	00941	Marijuana	Donald Walters Chadrick Colbert
188	4/12/2014	TT#9	00946	Marijuana	Donald Walters Chadrick Colbert
189	4/12/2014	TT#9	00948	Marijuana	Donald Walters Chadrick Colbert
190	4/13/2014	TT#7	02823	Cocaine	Mario Walters
191	4/13/2014	TT#7	02842	Marijuana	Mario Walters Jamar Stewart
192	4/13/2014	TT#9	01006	Cocaine	Donald Walters Aubrey Carwile

<b>COUNT</b>	<b>DATE</b>	<b>TARGET PHONE</b>	<b>SESSION</b>	<b>DRUG INVOLVED</b>	<b>DEFENDANT(S)</b>
193	4/13/2014	TT#9	01012	Cocaine	Donald Walters Rodney Parker
194	4/13/2014	TT#9	01066	Cocaine	Donald Walters Michael Tinsley
195	4/14/2014	TT#7	03011	Marijuana Cocaine	Mario Walters Aubrey Carwile
196	4/14/2014	TT#7	03014	Cocaine	Mario Walters Donald Walters
197	4/14/2014	TT#9	01069	Cocaine	Donald Walters Deon Delouiser
198	4/14/2014	TT#7	03075	Cocaine	Mario Walters FNU LNU #1
199	4/16/2014	TT#7	03317	Marijuana	Mario Walters
200	4/16/2014	TT#7	03337	Marijuana	Mario Walters
201	4/16/2014	TT#7	03342	Marijuana	Mario Walters
202	4/16/2014	TT#9	01199	Cocaine	Donald Walters Donyale Stancle
203	4/19/2014	TT#9	01363	Cocaine	Donald Walters Rodney Parker
204	4/21/2014	TT#9	01542	Cocaine	Donald Walters
205	4/21/2014	TT#9	01595	Cocaine	Donald Walters
206	4/21/2014	TT#9	01597	Marijuana	Donald Walters
207	4/22/2014	TT#9	01636	Cocaine	Donald Walters Rodney Parker
208	4/22/2014	TT#9	01645	Cocaine	Donald Walters Aubrey Carwile
209	4/23/2014	TT#9	01683	Cocaine	Donald Walters Deon Delouiser
210	4/25/2014	TT#9	01832	Cocaine	Donald Walters
211	4/27/2014	TT#9	01893	Cocaine	Donald Walters Aubrey Carwile
212	4/27/2014	TT#9	01900	Cocaine	Donald Walters Deon Delouiser
213	4/28/2014	TT#9	01968	Cocaine	Donald Walters Hiram Stancle
214	4/29/2014	TT#9	02000	Cocaine	Donald Walters
215	4/29/2014	TT#9	02002	Cocaine	Donald Walters Aubrey Carwile



COUNT	DATE	TARGET PHONE	SESSION	DRUG INVOLVED	DEFENDANT(S)
216	4/29/2014	TT#11	00021	Cocaine	Sergio Gonzalez
217	4/30/2014	TT#11	00022	Cocaine	FNU LNU #11
218	4/30/2014	TT#11	00038	Cocaine	FNU LNU #11
219	5/1/2014	TT#11	00396	Cocaine	Donald Walters
220	5/1/2014	TT#11	00492	Cocaine	Chantz Lucas
221	5/3/2014	TT#9	02245	Cocaine Marijuana	Donald Walters Hiram Stancle
222	5/3/2014	TT#9	02246	Marijuana	Donald Walters Hiram Stancle
223	5/3/2014	TT#9	02250	Marijuana	Donald Walters Hiram Stancle
224	5/3/2014	TT#9	02274	Marijuana	Donald Walters Aubrey Carwile
225	5/4/2014	TT#9	02286	Marijuana	Donald Walters Chadrick Colbert
226	5/4/2014	TT#11	01357	Cocaine	Chantz Lucas
227	5/5/2014	TT#11	01387	Cocaine	Donald Walters
228	5/5/2014	TT#11	01399	Cocaine	Sergio Gonzalez
229	5/5/2014	TT#11	01438	Cocaine	Chantz Lucas
230	5/5/2014	TT#11	01465	Cocaine	Sergio Gonzalez
231	5/6/2014	TT#9	02406	Cocaine	Donald Walters Chadrick Colbert
232	5/6/2014	TT#9	02412	Cocaine	Donald Walters Chadrick Colbert
233	5/6/2014	TT#11	01663	Cocaine	Chantz Lucas
234	5/6/2014	TT#11	01851	Cocaine	Donald Walters
235	5/6/2014	TT#11	01703	Cocaine	Sergio Gonzalez
236	5/6/2014	TT#11	01760	Cocaine	Sergio Gonzalez
237	5/7/2014	TT#11	01849	Cocaine	Sergio Gonzalez
238	5/7/2014	TT#11	01883	Cocaine	Sergio Gonzalez

DANNY C. WILLIAMS, SR.  
UNITED STATES ATTORNEY

  
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ALLEN J. LITCHFIELD  
Assistant United States Attorney

A TRUE BILL

*/s/Grand Jury Foreperson*  
\_\_\_\_\_  
Grand Jury Foreperson