

COPY

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
The premises located at 6504 South Broadway,
Los Angeles, CA 90003

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)
)
)
)

Case No.

16-0238M

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

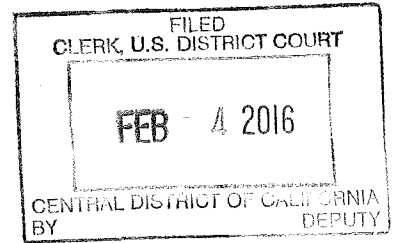
See Attachment A-1

located in the Central District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.



The search is related to a violation of:

Code Section
18 U.S.C. § 1962 (d)

Offense Description
See attached Affidavit

The application is based on these facts:
See attached Affidavit

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

LOGGED

2016 FEB 4 11:24 AM
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES
BY

LSI

Applicant's signature

SA Prentist L. Henderson III, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 2-4-16

Frederick F. Mumm

Judge's signature

City and state: Los Angeles, California

Frederick F. Mumm, U.S. Magistrate Judge

Printed name and title

AUSA: Jeffrey Chemerinsky (X16520) JMC

ATTACHMENT A-1

PREMISES TO BE SEARCHED

The premises located at 6504 South Broadway, Los Angeles, California 90003.

The SUBJECT LOCATION is part of a tan-colored group of three single-family residence type structures, which may or may not in fact be attached, with blue-colored front steps, enclosed together within a black metal fence, on the same property lot. The residential structures have a dark colored roof and black metal security screen doors on the front doors. "6504" and is depicted in black numbers on the trim of the structure, directly above the front steps. 6504 is the structure to the north. To the rear of the location (east side) is an alley with a vehicle entry gate which leads to a shared parking area for the three residences. The alley runs parallel to South Broadway and provides access to West 65th Street near the intersection of South Broadway.

ATTACHMENT B

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C. § 1962(d), namely:

1. Items of indicia of the existence of the East Coast Crips racketeering conspiracy and/or criminal enterprise, such as gang paraphernalia including photographs, and/or photographic albums, negatives, video tapes, films, undeveloped film and the contents therein, slides, drawings, paintings, sketches, graffiti, and writings, associated with or depicting the gang's signs and symbols, as well as gang members' names, initials, logos, monikers, slogans, or containing mention of street gang membership, affiliation, activity, or identity; sports memorabilia and attire related to the gang to include the Chicago Cubs, North Carolina Tarheels, New York Yankees, San Diego Padres, Brooklyn/Los Angeles Dodgers, and other sports teams that use "C," "N," "H," "SD" as a symbol as well as items of clothing which are blue in color or are otherwise related to the gang.

2. United States currency;

3. Safety deposit keys and records; books, records, receipts, bank statements and records, cancelled checks, money drafts, money orders and check receipts, receipts of wire transfer transactions, banking/ATM receipts, shipping receipts from postal and shipping businesses, and all other items evidencing the obtaining, accessing, secreting, transfer and/or concealment of money.

4. Log books, records, notes, and/or customer lists, ledgers, recipes, and other papers relating to the transportation, ordering, purchasing, processing, and distribution of controlled substances, firearms, and other contraband.

5. Telephone records, address and/or telephone books and papers reflecting names, addresses and/or telephone numbers including but not limited to, names of, addresses for, and/or telephone numbers of co-conspirators, including the contents of memory of pagers and cellular telephones.

6. Identification cards, Driver's licenses, social security cards, membership cards, credit cards, insurance cards, and other similar cards or documents identifying persons on or related to the premises, and items and documents that tend to establish the identities of persons in control of and/or associated with the premises and vehicles.

7. Firearms and ammunition, including but not limited to handguns, pistols, revolvers, shotguns, machine-guns, knives, impact weapons, chemical agents, conducted energy devices, and other weapons, and any records or receipts pertaining to these weapons, firearms and ammunition; ammunition of all calibers; magazines; gun holsters and cases.

8. Instruments and paraphernalia used in the preparation, manufacturing, packaging, transporting, and distribution of cocaine, marijuana, and/or heroin, including but not limited to cutting agents and adulterants, cutting boards, cutting and mixing tools, bags, baggies, bindles, balloons, wrappings,

blenders, scales, vials, beakers, jars and containers, pressing equipment; items containing narcotic residue; money counters; shipping boxes and packaging items such as fillers, padding, tape, postage, and shipping receipts.

9. Cocaine, marijuana, methamphetamine, heroin and/or other controlled substances.

10. Written communication to, from, and/or between co-conspirators, associates, and gang members, including but not limited to letters sent to/from jails, prisons, half-way-houses, camps, other institutions; notes; printed electronic communication; other documents related to the conspiracy; books, articles, and other writings about gang members and/or gang activity.

11. Electronic media and items containing electronic media, other than desktop and laptop computers, to include cellular telephones, personal data assistants (PDA), digital cameras, video cameras, MP3 players, iPads, iPods, iTouch, Kindle and similar devices, tablet devices, digital storage devices, computer disks, DVDs, floppy disks, memory cards, USB flash drives, and other electronic items used to store, transfer, upload or download electronic media.

AFFIDAVIT

I, Prentist L. Henderson III, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), and have been so employed since December 2015. I am currently assigned to a Criminal Enterprise Squad at the Los Angeles Field Office of the FBI, which conducts investigations into gang activity, in conjunction with the Los Angeles Metropolitan Task Force on Violent Gangs, a multi-agency federal, state, and local gang task force. Since graduating from the FBI Academy, my experience as an FBI agent includes conducting physical surveillance, interviewing witnesses and subjects, executing search and arrest warrants. I have participated in controlled drug/gun purchase operations using an informant and have participated in state and federal arrests for drug and racketeering related offenses.

2. Prior to becoming an SA, I served eight years as a police officer with the DeKalb County Police Department and the Marietta Police Department, both in the State of Georgia. There, my experience included preparing search/arrest warrants and testifying in municipal and superior courts, as well as before grand juries. I earned a master's degree in Public Administration with a concentration in Justice in December 2010 from Troy University and a bachelor's degree in Criminal Justice in May 2007 from Appalachian State University.

3. As an FBI SA, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7) and am empowered by law to conduct investigations of and to make arrests for Federal felony offenses.

II. PURPOSE OF AFFIDAVIT

4. This affidavit is made in support of an application for a warrant to search the following:

a. 6504 South Broadway, Los Angeles, California 90003 (the "SUBJECT LOCATION"), which is believed to be the residence of PAUL WALLACE aka GARY WALLACE aka "DOC" ("WALLACE");

b. A black-colored 2005 Mercedes-Benz sedan, bearing California license plate 6TUS561, VIN number WDBUF70J65A660772 (the "SUBJECT VEHICLE"), which is registered to and believed to be the vehicle used by WALLACE.

5. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. PREMISES TO BE SEARCHED

6. The premises to be searched (collectively, the "SUBJECT PREMISES") are described below and in Attachment A, which is incorporated herein:

a. 6504 South Broadway, Los Angeles, California 90003;

b. A black-colored 2005 Mercedes-Benz sedan, bearing California license plate 6TUS561, VIN number WDBUF70J65A660772.

IV. ITEMS TO BE SEIZED

7. The items to be seized are listed in Attachment B, which is incorporated as though fully set forth herein. I respectfully submit, that there is probable cause to believe that the items listed in Attachment B constitute evidence of a conspiracy to commit racketeering offenses as to an interstate enterprise, namely, the East Coast Crips gang, in violation of 18 U.S.C. § 1962(d), and that such items will be found at the SUBJECT PREMISES.

V. STATEMENT OF PROBABLE CAUSE

A. Background on the East Coast Crips

8. In March 2011, the FBI, in conjunction with the Los Angeles Police Department ("LAPD"), Southeast Division, launched an investigation into the criminal and racketeering criminal activities of the EAST COAST CRIPS ("ECC") gang. The ECC gang is a violent street gang that dominates several areas throughout South Los Angeles, California, from approximately 1st Street to 190th Street, between the 110 Freeway and Central Avenue. The ECC gang is comprised of thirteen primary sub-groups or "sets,"

each of which identify themselves by a number appended to the set's name that roughly corresponds to streets around which the set is located (e.g., 1, 59, 62, 66, 68, 69, 76, 89, 97, Q102, 118, 190, 1200). The East Coast Crips also consists of several smaller gangs such as the "71 Hustlers," and the "74 Hustlers," "Drugs N Alcohol," and multiple Gangster Crips sets. The ECC gang most commonly aligns with Rollin' Crips sets, Neighborhood Crips sets, and some motorcycle clubs, such as the Deuces and Sin City Disciples. The ECC gang most commonly feuds with Hoover Crips sets, Main Street Crips, the Broadway Gangster Crips, the Swans, the Pueblo Bishop Bloods, the Avalon Park Bloods, and the Florencia 13 gang. The ECC gang regularly engages in a variety of violent crimes including, assaults, robberies, home invasion burglaries, bank robberies, firearms violations, narcotics distribution and sales, intimidation, extortion, and murders. They also engage in vandalism, prostitution, vehicle theft, identity theft, and various frauds. The primary source of illicit income for the ECC gang and its members is from the sales of illegal narcotics (most commonly powder cocaine, crack cocaine, and marijuana), as well as from conducting robberies and home invasion burglaries (known as "flocking."). ECC gang members may identify themselves by wearing clothing items in the color blue and/or wearing sports attire of sports teams such as the Chicago Cubs, North Carolina Tarheels, New York Yankees, San Diego Padres, Brooklyn/Los Angeles Dodgers. Often times ECC gang members will wear flashy and expensive clothing, shoes, watches and various jewelry

items, drive luxury vehicles, possess the most modern style cell phones, and flaunt large amounts of cash. Common tattoos, hand signs, and other symbols of the ECC gang include the letters "E" and "C" or "EC" or "ECC" to represent "East Coast Crips," "N" and "H" to represent "Neighborhood Crips," "ES" to represent "East Side," the corresponding numbers of the ECC set they claim membership in (such as 62, 69, 97, 118, etc), "BK" to represent "Bloods Killer" and "FK" or "Flower Killer" to represent "Florescia 13 Killer," depictions of devils and skulls, depictions of the 110 Freeway sign, and depictions of stacks of money, money bags, dollar symbols, and a variety of firearms.

9. During the course of the investigation, I have learned that the ECC gang's various sets have established their own territories throughout the city and tend to operate independently within their own established territories on a day-to-day basis. However, all ECC sets claim membership and respect the overarching and encompassing parent gang of the ECC. Often times, members of a set of the ECC will sell drugs and conduct robberies or other crimes with members of their own set in and around their turf, but members of an ECC set will also intermingle with and commit crimes in association with other members from the various ECC sets. When in jail/prison, the ECC gang members all claim membership in ECC and not necessarily a specific neighborhood based set because ultimately each set collectively represents the ECC gang as a whole. The ECC gang is loosely structured with a range of ranks/roles, to include "OGs" (Original Gangsters) and "Big Homies," as well as "YGs"

(Young Gangsters). "OGs" and "Big Homies" have respect and authority in the gang, provide leadership, direction, and guidance to the younger members, can order gang meetings, shootings, and internal discipline, and often provide the supply, connections, and locations to sell and stash narcotics and firearms for the gang, such as small businesses and houses or apartment units. "YGs" generally carry out the day-to-day operations of the gang by way of intimidation, armed protection of their neighborhood and drug territory from rivals, conducting robberies, burglaries, and fraud schemes, retaliatory shootings, transportation and sales of narcotics and firearms, and the operation of gang hangout and stash locations. The ECC "YGs" are also referred to as "Foot Soldiers," "Thugs," "Shooters/Gunners," "Dope Boys," and "Floccers." Informant information and police reporting also support that members of multiple ECC sets participate together in various crimes, retaliate against rival gangs together, and attend gang meetings together, gang parties together, annual gang celebrations known as "hood days" together, and gang funerals together.

10. Through this task force investigation, agents and officers determined that the most criminally active components of the ECC gang were known as the "118s" (eleven-eights) in LAPD's Southeast Division, and the "6-PACC" (six-pack) in LAPD's Newton Division. The "118s" primarily claim territory between Imperial Avenue and 190th Street, between the 110 Freeway and Central Avenue. The "118s" are also subdivided into at least

three additional cliques known as the "5's" or "5-Stars," the "Imperials," and the "Dubb Blocc."

11. The "6-PACC" is a term used by the ECC gang to refer to the 62, 66, 68, and 69 ECC sets collectively since their turf overlaps and for the most part they all function together as one large super-set within the ECC gang. The "6-PACC" primarily claims territory between Slauson Avenue and Florence Avenue, between the 110 Freeway and Avalon Boulevard. The "6-PACC" is further comprised of multiple "floccing crews" (groups of gang members who form a "crew" to conduct home invasion burglaries across the county). The most popular and respected "floccing crew" within the ECC gang is known as the "Money Bag Boyz."

12. During the course of this investigation, agents and officers, with the assistance of Confidential Human Sources (hereafter "CHS"), made over 50 controlled narcotic and firearm purchases from ECC gang members and associates, in and around their territory, and served 13 search warrants on ECC affiliated locations. These investigative efforts have thus far resulted in the arrest of 15 subjects and the seizure of approximately 19 firearms and 183 rounds of ammunition, 23 ounces of crack cocaine, nine ounces of powder cocaine, 23 ounces of heroin, and over one kilogram of methamphetamine. Based on information provided to me by other law enforcement officers and my review of police reports, ECC gang members were also involved in numerous shootings, robberies, thefts, and home invasion burglaries throughout Los Angeles County which were investigated separately from this task force investigation. Agents and

officers have observed, both in person and via social media websites, dozens of ECC gang members displaying large sums of cash and expensive clothing and jewelry items, as well as driving luxury vehicles, without having any form of legitimate employment to financially support the ownership of these items. Additionally, numerous ECC gang members have discussed and displayed photographs of their gang membership and activity, their possession of narcotics and firearms, and made references to conducting drug sales and robberies, on their social media accounts.

B. WALLACE Is Identified to be an East Coast Crips Leader, Operating Out of the SUBJECT LOCATION

13. WALLACE¹ has exhibited the following recent racketeering related conduct in association to the SUBJECT LOCATION:

a. Based on my review of police reports and information gathered by task force officers, I learned that on December 12, 2012, WALLACE was contacted by law enforcement

¹ A review of criminal history records and prior police contacts revealed that WALLACE has approximately 20 arrests for criminal conduct consistent with racketeering activity, including: probation and parole violations, robbery, various narcotics and firearms offenses, prisoner in possession of a weapon, and murder. WALLACE has sustained at least eight prior convictions for: possession of marijuana for sale, carrying a loaded firearm in a public place, voluntary manslaughter, prisoner in possession of a weapon, receipt of stolen property, felon in possession of a firearm, prohibited person with ammunition, and possession of narcotic controlled substances. WALLACE is also a registered controlled substance offender.

According to numerous police documents, reports, and field interview cards, WALLACE has numerous tattoos, including the ECC gang tattoos of "DOC ECC" on his back and "NH ECC" on his left arm.

officers at 6508 S. Broadway, a residence adjacent to the SUBJECT LOCATION, with four other ECC gang members. During the parole search, one of the other individuals present was arrested for possession of a handgun. During this encounter, officers noted that WALLACE was a self-admitted ECC gang member, was wearing gang attire, had gang tattoos, was in a gang area, and was openly associating with other documented 6-PACC ECC gang members, and that WALLACE has been arrested alone or with known gang members for a crime consistent with usual gang activity.

b. Based on my review of police reports and information gathered by task force officers, I learned that on February 23, 2013, WALLACE was contacted by law enforcement officers during a parole compliance check at the SUBJECT LOCATION (6504 S. Broadway). During the parole compliance check, WALLACE admitted that he is ECC gang member with the moniker of "DOC," had gang tattoos, and was associating with other 6-PACC ECC gang members.

c. Based on my review of police reports and information gathered by task force officers, I learned that on June 12, 2013, WALLACE was contacted by law enforcement officers during a traffic stop. During this traffic stop, WALLACE admitted he was an ECC gang member with the moniker "DOC," and displayed an "ECC" tattoo on his left arm. Officers noted WALLACE's address as the SUBJECT LOCATION.

d. Based on my review of police reports and information gathered by task force officers, I learned that on July 27, 2013, WALLACE was contacted by law enforcement officers

during a traffic stop. During this traffic stop, WALLACE was a self admitted ECC gang member with the moniker of "DOC." The officer also noted that another ECC gang member was also present with WALLACE.

e. Based on my review of police reports and information gathered by task force officers, I learned that on April 25, 2015, WALLACE was contacted with regard to suspected narcotics activity by law enforcement on the street at South Broadway and West 65th Street and was with another ECC gang member.

f. Based on my review of police reports and information gathered by task force officers, I learned that on July 24, 2015, officers were driving southbound along Broadway at 62nd street when they observed an assault in progress, in which five black males were attacking a Hispanic male in the street. The victim attempted to flee from the group of attackers, but the group pursued the victim. A white Pontiac sedan arrived at the incident scene and three of the five attackers entered the vehicle and fled the location, while the other two fled on foot. The officers requested additional units to respond and followed the fleeing white Pontiac. The vehicle drove to 220 W. 65th Street where Officers made contact and arrested the suspects. While on scene to arrest the assault suspects, officers observed an AK-47 style assault rifle in plain view in the rear area of a Toyota Sienna, bearing California license plate 5TFN311, which was parked in front of 220 W. 65th Street (around the corner from SUBJECT LOCATION).

Officers subsequently impounded the vehicle and obtained a search warrant for the vehicle. Pursuant to the search, officers recovered a 7.62 caliber Norinco AKM-47S assault rifle with wood grips and 15-inch barrel, bearing serial number M001856, manufactured in China, loaded with a 30round capacity magazine containing 13 rounds of live ammunition. Inside the vehicle, officers also recovered a Ritz Rental Car receipt in the vehicle covering the period of July 18, 2015 to July 28, 2015. The renter's information indicated that the renter of the vehicle was WALLACE, with the SUBJECT LOCATION listed on the rental receipt. In addition, the car was paid for with a credit card in the name of WALLACE. Further investigation revealed that WALLACE's fingerprints were located on the vehicle's sliding door and rear window.

g. Based on my review of police reports and information gathered by task force officers, I learned that on December 17, 2015, WALLACE was contacted by law enforcement officers during a vehicle stop of the SUBJECT VEHICLE, in front of 220 W. 65th Street (just around the corner from SUBJECT LOCATION). During the encounter, Officers recognized WALLACE as the driver and another 6-PACC ECC gang member as the passenger. The SUBJECT VEHICLE was parked but running at the time. Officers subsequently observed in the driver's side door storage compartment a plastic baggie which contained unknown pills. When Officers recovered the pills, WALLACE stated, "Those are mine. I put them in that bag." Officers then counted 26 pills resembling Xanax in the baggie. WALLACE possessed no

prescription for Xanax. The location where the vehicle was parked and WALLACE was contacted is a well known 6-PACC ECC gang hang-out location and commonly used for high volume narcotics sales. WALLACE was arrested for possession of a controlled substance for sales. WALLACE was subsequently released on bond pending further proceedings and then failed to appear to court, resulting in a felony arrest warrant being issued for WALLACE, which may still be active.

14. In addition, I have obtained the following information regarding WALLACE's ongoing criminal activities from the following confidential sources:

a. In [REDACTED], I interviewed a Confidential Human Source (the "CHS")² who identified a California DMV photo of WALLACE, as someone the CHS knows as a 6-PACC ECC gang leader with the moniker of "DOC." The CHS reported that in [REDACTED], the CHS had heard WALLACE discussing interstate narcotics trafficking activity. CHS advised that WALLACE lives at the SUBJECT LOCATION which has three structures on the property.

b. In [REDACTED], the CHS reported that he had recently observed "DOC" in the rear yard of the SUBJECT

² The CHS has been an active source of information for the FBI since [REDACTED]. During this time, the CHS has provided accurate information regarding the ECC that has been corroborated through independent investigation. The CHS has provided no information that the task force has found to be untruthful and I consider the CHS to be reliable. The CHS's criminal record includes [REDACTED]. The CHS no convictions for anything involving dishonesty or untruthfulness.

PROPERTY, with other ECC gang members, who are both subjects of the task force investigation for their narcotics trafficking and firearms possession activity. CHS also observed WALLACE enter the SUBJECT PROPERTY from the rear parking area.

c. In addition, in mid-January 2016, I debriefed a self-identified member of the ECC gang, who stated to me that WALLACE is a leader of the ECC and directs the ECC activities. This individual also stated to me that WALLACE maintains weapons in his home. This individual also stated to me that WALLACE has been involved in shootings in the past, but that everyone is too afraid of WALLACE to report his violent activities to law enforcement.

C. Further Evidence Tying WALLACE to the SUBJECT LOCATION and SUBJECT VEHICLE

15. On December 15, 2015, law enforcement officers conducted a spot check surveillance of the SUBJECT LOCATION. Based on my discussions with the officer, I learned that at the SUBJECT LOCATION the officers observed a black-colored Mercedes Benz sedan, matching the description of the SUBJECT VEHICLE, bearing a nondescript paper license plate, parked in the rear parking area.

16. Based on my review of public records, as reported by Thomson Reuters, I learned that the SUBJECT LOCATION is owned by Javier Rodriguez. There's no indication that Mr. Rodriguez lives at the SUBJECT LOCATION. During the years of 2013 to 2015, Thomson Reuters, which compiles public utility

information, indicates that WALLACE resided at the SUBJECT LOCATION.

17. Based on my review of California Department of Motor Vehicles ("DMV") records, I learned the following:

a. WALLACE's current California driver's license lists his address as the SUBJECT LOCATION, that is, 6504 South Broadway, Los Angeles, since September 2013, and which was updated with the same address as recently as November 12, 2015.

b. A query of the DMV for vehicle registration records for WALLACE indicate the SUBJECT VEHICLE, a 2005 Mercedes-Benz sedan, bearing California license plate 6TUS561, VIN number WDBUF70J65A660772, is registered to WALLACE at the address of the SUBJECT LOCATION.

18. On February 2, 2016, I, along with other law enforcement agents, conducted a spot check surveillance of the SUBJECT LOCATION. During this surveillance, we observed a white-colored Cadillac SUV bearing California license plate 5ZZJ088, parked in the rear parking area. A query of the DMV for vehicle registration records for the Cadillac SUV indicated a current California vehicle registration for a 2003 Cadillac SUV, bearing California license plate 5ZZJ088, VIN number 1GYEK63N63R200305, registered to WALLACE, with the address of 6504 South Broadway, Los Angeles (the SUBJECT LOCATION), since April 18, 2015.

D. Based on My Training and Experience, Evidence of WALLACE's Leadership of the East Coast Crips Will Likely Be Found at the SUBJECT LOCATION

19. Based on my training and experience, as well as the training and experience of other investigators in this case with whom I have consulted, I am familiar with the *modus operandi* of persons involved in criminal street gangs and the illegal distribution of narcotics and firearms, as well as the terminology used by persons involved in those enterprises. Based on this, I am familiar with the following:

a. Persons involved in illicit distribution of narcotics or firearms routinely attempt to conceal their identities as well as the location at which drug/gun transactions take place. These people are also known to have vehicles, properties, telephones, utilities, and other items purchased in the names of others, and through the use of stolen identities, in order to conceal the association of drug/gun activities with their true identity and financial transactions.

b. Individuals engaged in organized narcotics and firearm distribution and sales maintain extensive contact with persons from whom they receive drugs/guns and with whom they distribute these drugs/guns, and in doing so, often utilize coded language to disguise their activity.

c. Narcotics and firearm traffickers maintain on hand large amounts of U.S. currency, as proceeds of their gun and drug sales, in order to maintain and finance their ongoing narcotics activities and other businesses, as well as paying for

vehicles, clothing, jewelry, firearms, entertainment, living expenses, bills, acquiring assets, and making other purchases.

d. Persons engaged in narcotics and firearms trafficking conceal in their vehicles and residences, the residences of their associates, residences of family members, and associated businesses or other locations where the offenders may hang-out, proceeds of their drug and gun transactions to include, records of drug/gun transactions, large amounts of currency, money counters, financial instruments, precious metals and gems, jewelry, stolen or counterfeit goods, and other items of value.

e. Persons engaged in narcotics trafficking conceal in their vehicles and residences, the residences of their associates, residences of family members, and associated businesses or other locations where the offenders may hang-out, various amounts and types of narcotics, scales, vials, blenders, baggies, bindles, balloons, foil, plastic wrap, cutting agents and adulterants, cutting boards, cutting and mixing tools, and other items used in preparing, manufacturing, packaging, distributing, transporting, and selling narcotics, as well as items such as pipes, tubes, syringes, spoons and items used to mix, administer, ingest, inhale, or otherwise use the narcotics.

f. Persons engaged in gang activity and narcotics and firearms trafficking conceal in their vehicles and residences, the residences of their associates, residences of family members, and associated businesses or other locations where the offenders may hang-out, firearms, magazines,

ammunition, weapons cases/bags, knives, and other weapons and weapon accessories. Additionally, these offenders commonly keep these items in nearby bushes, planter boxes, trash cans, barbeque grills, bumpers and tire wells of vehicles, and other similar locations outside of the residences and business, in easy-to-reach locations in and around their area of operation.

g. Most firearms kept and/or made accessible to gang members and drug/gun traffickers are not registered to the offender and the firearm may be modified. Furthermore, it is common for gang members and drug/gun traffickers to carry and or use firearms in furtherance of drug/gun transactions and other violent crimes.

h. Individuals involved in narcotics trafficking often maintain records linking them to their trafficking and that these records may include records of narcotics customers and associates, sales, debts, and shipments. The records/documents may include receipts of wire transfer transactions, banking/ATM receipts, shipping receipts from postal and shipping businesses, telephone records, telephone books which identify customers and/or co-conspirators, and photographs of co-conspirators. Even if off-site locations are used to store the above records, some evidence such as safety deposit keys, records, and receipts and/or documents regarding multi-warehouses, storage facilities, mail and answering services may be present.

i. Individuals involved in gang activity and narcotics trafficking heavily utilize cellular telephones and

other electronic devices to communicate with one another and that these devices often contain indicia of the identity of individual and his/her associates, as well as their criminal activity, including but not limited to, call logs, voicemail messages, text messages, electronic messages (e-mail), photographs, videos, address books, calendars, notes, and ledgers.

j. Individuals involved in gang activity and narcotics/firearm trafficking often utilize social networking websites on the internet, which are commonly accessed via cellular telephones, to communicate with one another, and post comments, pictures, videos, and music related to their membership and activity in the gang and/or their drug/gun trafficking activity.

k. Individuals involved in gang activity and/or holding gang membership often identify their membership and/or status in a respective gang through paraphernalia such as bandanas, certain clothing styles, brands of apparel, sports team attire, certain colors associate with their gang, drawings, photos, or miscellaneous writings, or objects, or graffiti depicting the gang's signs and symbols, as well as gang members' names, initials, logos, monikers, slogans, or containing mention of street gang membership, affiliation, activity, or identity, as well as items and markings that show a disrespect for rival gangs.

VI. Request for No Knock and Nighttime Service

20. I request that the Court authorize investigators to serve this warrants during the nighttime, as set forth under Fed. R. Crim. Proc. 41(e)(2)(A)(ii). Good cause exists because the SUBJECT LOCATION is associated with an individual who is a member of a violent criminal street gang with a history of reprisal against rivals, counter-surveillance against law enforcement, ongoing and repeated criminal activity, and firearms possession and trafficking. Given the holding set forth in *Gooding v. United States*, 416 U.S. 430 (1974), that there is no need for the presence of exigent circumstances in narcotics cases to justify a nighttime search, I believe that nighttime service is warranted in this case. In addition, nighttime service is justified in this case given the nature of the location being entered. The residence is inside a fenced-in area and in a neighborhood with a large number of East Coast Crips gang members. If law enforcement were to execute this warrant during the day time, it would be very hard to evade detection and would, thus, pose a risk for officer safety.

21. For the same reasons, including the safety concerns based on WALLACE's suspected weapons possession, I am requesting authorization for a "no-knock entry" of the SUBJECT LOCATION. Based on the evidence described above, I believe knocking and announcing entry would be dangerous to the agents serving the warrant and would also allow the destruction of evidence.

