

CONTINUATION OF CRIMINAL COMPLAINT

Background and Proposed Charge

I, Justin Wonders, being duly sworn, state as follows:

1. I am a Task Force Officer with the United States Drug Enforcement Administration, United States Department of Justice. I am currently assigned to the Grand Rapids Office in the DEA's Detroit Field Division. During my time as a Task Force Officer, I have participated in investigations of unlawful drug trafficking and money laundering and, among other things, have conducted or participated in surveillance, the execution of search warrants, debriefings of informants, reviews of taped conversations and drug records, and have participated in investigations that included the interception of wire and electronic communications. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, the methods of payment for such drugs, the laundering of narcotics proceeds, and the dialect, lingo, and coded language used by narcotics traffickers. During my tenure with DEA, I have been specifically involved in numerous controlled substance-related investigations resulting in arrests and convictions of individuals for violations of Title 21, United States Code, Sections 841 and 846. The information set forth in this complaint is based upon my personal knowledge and participation in the investigation described below, as well as information provided to me by other law enforcement officers. I have not set forth all of the information known to me or known to other law enforcement officers concerning this matter.

2. I respectfully submit that the facts set forth in this complaint establish probable cause to believe that, on or about October 8, 2015, in Kalamazoo County, in the Western District of Michigan, JOHNNY RATLIFF and BRANDON JORDAN knowingly possessed with intent to distribute a quantity of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C). I further submit that the facts set forth herein establish probable cause to believe that, on October 8, 2015, in Kalamazoo County, JOHNNY RATLIFF knowingly

possessed with intent to distribute a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Facts Establishing Probable Cause

3. On October 8, 2015, investigators from the Kalamazoo Valley Enforcement Team intercepted a suspicious parcel addressed to *** ***** ***, in Kalamazoo, MI. The parcel bore a sender address in Los Angeles, California, a known source location for narcotics. After a K-9 conducted a free-air sniff on the parcel and gave positive alert for the presence of narcotics, investigators obtained a warrant to search the parcel. The parcel contained approximately 450 grams of suspected crystal methamphetamine, also known as “ice,” concealed in packaging materials. Field and subsequent laboratory tests confirmed that the substance concealed in the parcel was in fact methamphetamine.

4. Investigators then obtained a second, anticipatory warrant to search *** ***** *** for evidence of drug trafficking. The warrant was conditioned upon the successful controlled delivery of the parcel to the premises. An investigator delivered the parcel to BRANDON JORDAN, who carried it into the premises.

5. Once JORDAN had taken the package inside, investigators waiting outside executed the warrant. A number of individuals were inside the house, including JORDAN, JOHNNY RATLIFF, and KR. During the search of an upstairs bedroom investigators observed a safe sitting on top of a nightstand. Inside the safe they located and seized, among other items, three handguns; ammunition; suspected methamphetamine; suspected heroin; \$1,315 U.S. currency; prescription pill bottles, one of which bore RATLIFF’s name; and photographs of RATLIFF. Inside the nightstand (on which the safe was sitting) investigators located two boxes of plastic baggies, money transfer documentation, RATLIFF’s Michigan identification card, and a court document addressed to RATLIFF.

6. KR, JORDAN and RATLIFF waived their respective *Miranda* rights and agreed to be interviewed. KR admitted she was RATLIFF’s girlfriend and had

been with him for a year. She stated the two had slept together in the upstairs bedroom the previous two nights. Investigators observed that the bedroom where KR claimed she and RATLIFF had been sleeping was the same room from which the firearms and suspected methamphetamine and heroin had been seized.

7. KR further admitted sending several thousand dollars to unknown recipients in California via Western Union, at the request of RATLIFF and JORDAN. She had completed one of the transfers on Tuesday, October 6th (two days before the arrival of the methamphetamine package). KR also admitted she had been with RATLIFF on approximately 20 occasions when he supplied people with “clear stuff that looks like glass.”

8. After initially stating that he believed the methamphetamine package contained “watches and rings,” JORDAN eventually admitted he knew the package contained methamphetamine, and that he had paid \$5,000 for it. JORDAN also claimed, despite the presence of RATLIFF’s documentation and pills inside the safe and RATLIFF’s identifying documents lying nearby, that the drugs in the safe were his. RATLIFF denied any knowledge of the drugs or firearms.

9. The suspected methamphetamine and heroin seized from the safe were later weighed and lab-tested. The suspected methamphetamine consisted of 5.19 grams of methamphetamine. The suspected heroin consisted of 8.29 grams of heroin. In my training and experience, 5.19 grams of methamphetamine and 8.29 grams of heroin are distribution, not user, quantities of the respective drugs.

Conclusion

10. Based upon the foregoing information, I believe there is probable cause to charge BRANDON JORDAN with possession with intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and to charge JOHNNY RATLIFF with possession with intent to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).