

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

MAY 17 2009

PHILIP M. FRAZIER  
U.S. MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF ILLINOIS  
BENTON, ILLINOIS

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff )  
 )  
 vs. )  
 )  
 RAYMOND M. MARTIN, )  
 )  
 Defendant. )

CASE NUMBER 09-MJ-4027-PMF

**CRIMINAL COMPLAINT**

I, Glenn H. Rountree, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

**COUNT 1**  
**DISTRIBUTION OF MARIJUANA**

On or about April 27, 2009, in Gallatin County, within the Southern District of Illinois,

**RAYMOND M. MARTIN,**

defendant herein, did knowingly and intentionally distribute approximately 440 grams of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

**COUNT 2**  
**DISTRIBUTION OF MARIJUANA**

On or about May 4, 2009, in Gallatin County, within the Southern District of Illinois,

**RAYMOND M. MARTIN,**

defendant herein, did knowingly and intentionally distribute approximately 458 grams of marijuana,

a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

**COUNT 3**  
**DISTRIBUTION OF MARIJUANA**

On or about May 11, 2009, in Gallatin County, within the Southern District of Illinois,

**RAYMOND M. MARTIN,**

defendant herein, did knowingly and intentionally distribute approximately 220 grams of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

**COUNT 4**  
**CARRYING A FIREARM DURING AND IN RELATION TO A DRUG TRAFFICKING CRIME**

On or about May 4, 2009, in Gallatin County, within the Southern District of Illinois,

**RAYMOND M. MARTIN,**

defendant herein, during and in relation to a drug trafficking crime, to wit: distribution of marijuana, as charged above in Count 2, did knowingly carry a stainless steel revolver, in violation of Title 18, United States Code, Section 924(c).

**COUNT 5**  
**CARRYING A FIREARM DURING AND IN RELATION TO A DRUG TRAFFICKING CRIME**

On or about May 11, 2009, in Gallatin County, within the Southern District of Illinois,

**RAYMOND M. MARTIN,**

defendant herein, during and in relation to a drug trafficking crime, to wit: distribution of marijuana, as charged above in Count 3, did knowingly carry a stainless steel revolver, in violation of Title 18, United States Code, Section 924(c).

## AFFIDAVIT

**YOUR AFFIANT** further states that the following information is true and accurate to the best of my knowledge and belief:

1. I am a Task Force Agent of the United States Drug Enforcement Administration and an Inspector with the Illinois State Police/Southern Illinois Drug Task Force and have been so employed since May 2004. I have been a law enforcement officer involved in the investigation of narcotics offenses for 18 years. During that time, I have been involved in numerous investigations involving large scale trafficking in unlawful narcotics, including the production, manufacture, and distribution of marijuana. Based upon the investigation and my personal observations, as well as those of fellow agents, I have probable cause to believe that the above named individual committed the charged criminal offenses for the following reasons:
  
2. On April 9, 2009, law enforcement agents developed a confidential source (C/S) who advised that the C/S had been approached in approximately November 2008 by RAYMOND MARTIN, who is the Sheriff of Gallatin County, Illinois, and asked by Martin to distribute marijuana for Martin. At that time, Martin handed the C/S approximately two pounds of marijuana and asked the C/S if the C/S could "get rid of that" for Martin. The C/S stated that Martin explained to the C/S that Martin would provide quantities of marijuana to the C/S on a "front" basis, meaning that the C/S would pay Martin for the marijuana after it was sold. Martin stated the marijuana cost Martin \$1000 per pound and explained to the C/S that after the initial \$1000 per pound investment was paid to Martin by the C/S, Martin and the C/S would split the profits on a 50 - 50 basis. The C/S stated that C/S agreed to this arrangement. The C/S further stated that from approximately November 2008 until April 8, 2009, Martin delivered one or two pound quantities of marijuana to the C/S on the average of one time every two weeks. On two additional occasions, Martin delivered approximately ten pounds of marijuana and on another occasion delivered approximately twenty pounds of marijuana to the C/S. On those three occasions, Martin told the C/S to sell this marijuana for whatever amount the C/S could get out of it, stating that it was all profit, as Martin did not have anything invested in those quantities of marijuana. The C/S described the marijuana as brown and dried out appearing to be a year or more old. I know from my experience as a narcotics investigator that marijuana which has been stored in an evidence facility for a long period of time would have the appearance described by the C/S. These deliveries of marijuana by Martin to the C/S usually occurred at a rural and remote location in southern Gallatin County.

3. In interviews conducted on April 9 and 10, 2009, the C/S advised that the last time he had been fronted marijuana from Martin was on April 8, 2009. The C/S stated that Martin had fronted him two pounds of marijuana on that date and that the C/S was still in possession of approximately one pound of that marijuana. The C/S provided the remaining approximate one pound of marijuana to law enforcement agents. Law enforcement agents field tested it, with positive results, and maintained that marijuana as evidence. The C/S stated that the C/S's and Martin's usual method of contact between deliveries was via cellular telephone. The C/S stated that the cellular telephone number provided to the C/S by Martin for that purpose was (618) 841-3981 and that Martin instructed the C/S to only call Martin at that number. Martin instructed the C/S to never make specific reference to marijuana during these calls and to speak in vague or purposely misleading terms. Further investigation revealed that the subscriber of (618) 841-3981 was the Gallatin County Sheriff's Department.
4. To corroborate the information provided by the C/S, law enforcement agents arranged to record a telephone call from the C/S to (618) 841-3981 on April 15, 2009. When that call was placed, Martin answered the phone. During the call, the C/S advised Martin that the C/S would "have all of that together" by the following week and would call Martin to arrange to meet.
5. On April 23, 2009, at approximately 11:15 a.m., the C/S placed a recorded cellular telephone call to Martin at the previously described number and made arrangements to meet Martin at their usual rural location. Martin advised that he was transporting a prisoner and would call the C/S back as soon as he was finished. At approximately 12:30 p.m., the C/S received a telephone call from Martin who was again utilizing cellular telephone number (618) 841-3981. During that call, which was also recorded, Martin advised that he was still transporting a prisoner and would call the C/S in approximately an hour and a half. At approximately 2:08 p.m., Martin again call the C/S from (618) 841-3981, and told the C/S to meet him at the usual location in five minutes.
6. On April 23, 2009, at approximately 2:13 PM, the C/S met with Martin at their usual rural location. The C/S had been searched prior to this meeting for the presence of money, drugs, or other contraband, and was under the surveillance of law enforcement agents. Recorded audio and video surveillance of the meeting between Martin and C/S was also utilized. Prior to the meeting, the C/S was provided with \$1600 in cash by law enforcement agents to provide to Martin as partial payment for the two pounds of marijuana fronted to the C/S by Martin on or about April 8, 2009. Martin arrived at the meeting location in a black late model Ford Expedition with Illinois Sheriff's Department licence plates, numbered 30-1, registered to the Gallatin County Sheriff's Department. This Ford Expedition is Martin's official Gallatin County Sheriff's Department

patrol vehicle. Martin was also wearing his sheriff's department uniform. Agent's providing close surveillance positively identified Martin in the vehicle. Upon Martin arriving at the location, the C/S provided Martin with the \$1600 in cash, the serial numbers of which had been pre-recorded. As reflected on the audio recording, after taking the cash from the C/S, Martin then told the C/S that the C/S owed Martin \$1400 dollars. The C/S had previously advised law enforcement agents that the C/S owed Martin for the following: 1) Martin had provided the C/S with a portion of the C/S's bond money when the C/S was arrested in Saline County in January 2009 for Driving Under the Influence and Possession of a Controlled Substance; 2) the controlled substance the C/S was arrested in possession of in January 2009, which was Xanax, for which Martin had provided the money to the C/S to purchase and then distribute under the same profit sharing arrangement as applied to the marijuana; and 3) money for marijuana which Martin had fronted to the C/S which had been "ripped off" from the C/S by others. I am aware from my experience in drug investigations that it is common for those involved together in distributing drugs to provide bond money if the other is arrested to try to avoid the possibility that the arrested individual will cooperate with law enforcement agents and provide information about the other individual's involvement in order to reduce his or her bond or to obtain a favorable disposition. Prior to Martin informing the C/S that "you still owe fourteen," Martin referred to a notebook located in his sheriff's department vehicle where Martin had recorded the amount the C/S owed. The C/S had previously told law enforcement agents that Martin always had a notebook with him on his person or in his sheriff's department vehicle in which he would record the amount or monetary value of the marijuana Martin fronted to the C/S, payments made by the C/S to Martin, and amounts owed by the C/S to Martin. Also as reflected in the audio recording, during their meeting Martin told the C/S that Martin only has "one" left (referring to one pound of marijuana) and that he is working on "getting a bigger supply" from an unidentified individual in Ridgeway, Illinois. Martin and the C/S further discussed the price that the C/S can sell the marijuana for to an individual in Indiana to whom the C/S told Martin the C/S can sell the entire pound when Martin fronts it to the C/S. Martin and the C/S also discussed growing marijuana and the best type of soil to use. Martin told the C/S that he can show the C/S where the C/S can get "some real good dirt" and stated that Martin is going to do the same thing while showing the C/S the bags Martin will use to put the dirt in. These bags were located in Martin's sheriff's department vehicle.

7. On April 27, 2009, law enforcement agents met with the C/S and the C/S provided the agents with a bag of marijuana seeds which Martin had previously provided to the C/S and which the C/S had previously advised law enforcement agents about. The C/S had previously advised that Martin had told the C/S that he could reduce the debt the C/S owed by growing marijuana plants for Martin.

8. On April 27, 2009, at approximately 2:02 p.m., a recorded cellular telephone call was placed by the C/S to Martin at (618) 841-3981. The C/S told Martin that the C/S was ready for delivery and they made arrangements to meet at their usual location that afternoon. On that date, law enforcement agents were utilizing aerial surveillance and aerial video recording of Martin and observed Martin leaving a barn located behind his residence at 9400 Sawmill Road, Junction, Illinois, in his Gallatin County Sheriff's Department vehicle at the time he received the call from the C/S. After the call, aerial surveillance agents observed Martin park at and enter his residence for a few minutes. Upon exiting, Martin again entered his sheriff's department vehicle and was observed to drive directly to the meeting location from his residence.
  
9. Martin arrived at the meeting location in his sheriff's department vehicle at approximately 2:16 PM. Martin was positively identified by close ground surveillance agents. Martin was also wearing his sheriff's department uniform. Audio and video recording of the meeting between the C/S and Martin was also utilized. The C/S and the C/S's vehicle was searched by law enforcement agents before Martin arrived. Upon Martin's arrival, as reflected on the video recording, Martin put a pair of gloves on and then handed the C/S a black trash bag which contained a clear plastic bag containing approximately one pound of marijuana. Martin advised the C/S that even though the C/S still owed Martin \$1400, they can split the profit on this marijuana 50/50 and the C/S can pay the debt "some other time." Martin told the C/S that Martin has "one" invested in the marijuana meaning one thousand dollars and that if the C/S can get \$1400 for the pound then Martin and the C/S will have "two" each meaning \$200. Martin also told the C/S that Martin's usual source for marijuana is out of town for several weeks and provided the C/S with the name of an individual that Martin knew to have marijuana and told the C/S to contact that individual to see from where he is obtaining his marijuana. Martin told the C/S to "see what kind of price he can give you." Martin and the C/S then again discussed growing marijuana. Martin told the C/S that Martin had some marijuana plants started and described the unusual way in which those plants were growing and the possibility that the type of fertilizer Martin had used was the cause. Martin and the C/S discussed the best type of fertilizer mixture to use in growing marijuana. Martin and the C/S also discussed the fact that other law enforcement agencies would be utilizing helicopter and video surveillance to locate clandestine outdoor marijuana grow operations. Martin advised the C/S that when the C/S approaches the location of the C/S's marijuana plants to "scope out" the area by circling the area several times and to put a mask on in the daytime before entering the plot where the plants are located. After Martin left the location, the C/S provided the trash bag containing the approximate one pound of marijuana to law enforcement agents. The marijuana was field tested with positive results.

10. On May 4, 2009, at approximately 1:40 PM, the C/S placed a recorded cellular telephone call to Martin at (618) 841-3981. During that call the C/S advised Martin that "I got all that" in reference to the money for the marijuana Martin fronted the C/S on April 27<sup>th</sup> and that "you can bring me a couple if you want" in reference to two pounds of marijuana. Martin responded, "Okay," and arranged to meet the C/S at their usual location at 2:15 p.m.
11. On May 4, 2009, at approximately 2:13 p.m., Martin arrived at the meeting location in his sheriff's department vehicle and in his sheriff's department uniform. Law enforcement agents positively identified Martin upon his arrival at the meeting location. The C/S had been searched for drugs, money, and other contraband before Martin arrived with negative results. Aerial surveillance and aerial video recording was utilized by law enforcement agents to track Martin's movements. Martin was at the sheriff's department, located in the Gallatin County Courthouse, when he received the cellular telephone call from the C/S. Martin traveled to the meeting location directly from the Gallatin County Courthouse. Audio and video recording devices were used to record the meeting between the C/S and Martin. Upon Martin's arrival, as depicted on the video recording, the C/S paid Martin \$1400 in cash, the serial numbers of which had been pre-recorded, for the marijuana Martin had fronted to the C/S on April 27<sup>th</sup>. The C/S and Martin again discussed the \$1400 in debt owed by the C/S to Martin and the C/S told Martin that \$200 of the \$1400 the C/S just provided to Martin is the C/S's share of the profit to be applied to the C/S's debt. Martin recorded the payment toward the debt in writing. Martin then told the C/S that Martin was aware of another local source that had obtained 12 pounds of "fairly good green" marijuana and Martin believed that Martin could obtain one or two pounds of that marijuana, but that Martin needed to find out from the C/S what the C/S thought the C/S could get rid of before Martin committed to both pounds. Martin then told the C/S that there were other individuals selling marijuana in Gallatin County and that Martin was "gonna try and put the fear of God in him and see if we can get him out of the business." Martin further stated that he would do so to get rid of the "competition." Martin told the C/S that Martin would have to go to Ridgeway, Illinois, to get the marijuana and would call the C/S when he was ready to meet the C/S back at that location later that evening.
12. Aerial surveillance agents followed Martin in his sheriff's department vehicle and observed him meet with an individual in a white pick-up at location approximately six miles from the meeting location. After that meeting, Martin contacted the C/S from (618) 841-3981 and told the C/S to meet Martin at their usual meeting location in a few minutes.
13. At approximately 3:32 p.m., Martin arrived back at the meeting location. Audio

and video recording devices were again utilized. The C/S was again searched for drugs, money, and other contraband before Martin arrived with negative results. Martin told the C/S that Martin met Martin's source half-way which was why Martin returned more quickly than planned. Martin exited his sheriff's department vehicle, put on a pair of gloves, and walked to the back of the vehicle. Martin was armed with his service revolver which appears to be a .357 caliber revolver. From the rear of his sheriff's department vehicle Martin removed a clear plastic bag containing approximately one pound of marijuana and handed it to the C/S and stated to the C/S that the marijuana "looked green." Martin and the C/S then discussed how much better quality this marijuana was than previous quantities of marijuana Martin had fronted to the C/S. Martin advised the C/S that the C/S should be able to charge \$1600 per pound for this marijuana and that by doing so, Martin and the C/S would make "three each" in reference to \$300 a piece in profit over Martin's \$1000 investment in the pound. Martin indicated that to the C/S that Martin had used \$1000 of the \$1400 that the C/S had given Martin earlier to pay for the pound of marijuana. Martin also stated that Martin would attempt to obtain more of that particular marijuana since it was of such good quality. After Martin left the location, the C/S provided the plastic bag containing the approximate one pound of marijuana to law enforcement agents. The marijuana was field tested with positive results.

14. On May 11, 2009, at approximately 12:45 p.m., the C/S placed a recorded cellular telephone call to Martin at (618) 841-3981. The C/S stated to Martin that he could sell two "cars" if Martin had them. Martin had previously told the C/S to use "cars" when speaking on the phone to Martin when referring to pounds of marijuana (i.e. one car equals one pound). At 12:55 p.m., Martin called the C/S back from (618) 841-3981 and told the C/S that Martin would meet the C/S at their usual meeting location in approximately five minutes. Law enforcement agents were again utilizing aerial surveillance to track Martin's movements. At the time Martin received the cellular phone call from the C/S, and returned the C/S's call, Martin was located at the Gallatin County Courthouse. Aerial and ground surveillance agents observed Martin exit the courthouse and drive directly to the meet location.
15. At approximately 1:07 p.m., Martin arrived at the meeting location in his sheriff's department vehicle and uniform. Law enforcement agents providing close surveillance positively identified Martin. The C/S was searched for the presence of drugs, money, and other contraband prior to Martin's arrival with negative results. Audio and video surveillance devices were again utilized to record the meeting between Martin and the C/S. Upon his arrival, Martin exited his vehicle. Martin was armed with his service revolver. The C/S provided Martin with \$1300 in cash, the serial numbers of which had been pre-recorded, as payment for the approximate one pound of marijuana Martin had fronted the



C/S on May 4<sup>th</sup>. Martin counted the money the C/S handed him. Martin then told the C/S that Martin only had approximately ½ pound left, but could probably get another ½ pound if Martin was able to make contact with his source. As reflected on the audio recording, Martin then told the C/S that one of Martin's "old guys" has a friend that is "hooked up" with the Gangster Disciples street gang from whom he could obtain marijuana for \$500 per pound for which Martin would have to pay \$700. Martin then discussed with the C/S how much profit that Martin and the C/S could make from the sale of that marijuana if Martin was able to obtain it. Martin made arrangements to meet the C/S back at the meeting location in a few minutes after Martin made a cellular phone call to determine when Martin could provide the C/S with the ½ pound to one pound of marijuana.

16. Martin was observed by aerial surveillance agents to travel approximately two to three miles up the road from the meeting location and stop where there was cellular service. Martin returned to the meeting location at approximately 1:20 p.m. Upon his return, Martin told the C/S that Martin was going to try to get 2-3 pounds of the better quality marijuana, but wasn't sure he could. Martin also stated that he was going to Ridgeway, Illinois, to get ½ pound of the lesser quality marijuana.
17. Martin left the meeting location at approximately 1:24 p.m. Aerial and ground surveillance agents followed Martin and observed him drive to Ridgeway, Illinois, to his wife's place of employment where he exited his sheriff's department vehicle and entered his wife's 2005 Dodge mini-van which is gold in color and bears Illinois license plate number 8253566. A records check through the Illinois Secretary of State revealed that the Dodge minivan is registered to Raymond and Kristina Martin. Martin was then observed to drive to Omaha, Illinois, where he stopped at a convenience store. Martin parked in front of the gas pumps and entered the building where he stayed for approximately 10 minutes. Martin then re-entered the mini-van and drove back to Ridgeway, Illinois, where he had obtained the mini-van. Martin entered the business and remained for a few minutes. Martin then re-entered his sheriff's department vehicle and drove to his residence at 9400 Sawmill Road, Junction, Illinois. Martin entered his residence and remained there for approximately five minutes. Martin then left the residence in his sheriff's department vehicle and drove to a location where he met an individual in another vehicle. Martin remained at that location parked side by side with that vehicle for approximately five minutes. Martin then left that location and drove to another location near Equality, Illinois, where he met with another individual in a white pick-up. Martin met with that individual for approximately seven minutes. After Martin departed that location, Martin called the C/S's cellular phone from (618) 841-3981 while he was still driving. During that call, Martin stated that Martin had

obtained part of the marijuana, but that Martin had “one more stop to make in Shawneetown” to see if Martin could “score some more.” Martin told the C/S to head to the meeting location and that Martin would be there shortly. While he was making this call to the C/S, surveillance agents observed Martin drive to the Gallatin County Courthouse and park in the rear of that building where the sheriff’s department evidence storage facility is located. Martin remained in the courthouse for approximately five minutes. When Martin exited the courthouse, Martin was carrying a container and placed that container in his sheriff’s department vehicle. Martin was then observed by aerial and ground surveillance agents to drive directly to the meeting location.

18. Martin arrived at the meeting location at approximately 3:49 p.m. Martin put on a pair of gloves and then handed the C/S one bag containing approximately 1/4 pound of marijuana and three smaller bags containing a total of approximately 84 grams. The three smaller bags appeared to be the better marijuana which Martin had provided to the C/S on May 4<sup>th</sup> and Martin told the C/S that he paid \$250 for that marijuana. Martin and the C/S discussed that they should be able to profit \$100 each from the sale of that marijuana. The larger quantity appeared to be from a different source. Martin stated that he had also included some “brown home grown” in that bag to make sure the that the weight of marijuana was a 1/4 pound. Martin also stated that Martin had \$250 invested in that marijuana. Martin further stated that he had just ordered 10 pounds of marijuana that was “coming from Memphis” and that it should arrive Thursday or Friday (which would be May 14<sup>th</sup> or 15<sup>th</sup>). Of that 10 pounds, Martin told the C/S that Martin would front the C/S three pounds when it arrived. Martin also told the C/S to check with the C/S’s “guy in Carmi” to see if they could obtain marijuana from that individual. Martin then asked the C/S about the marijuana plants the C/S had planted and asked “how many we got out” to which the C/S responded “about 30.” The C/S then asked Martin if he could obtain larger quantities of marijuana from Martin to sell since that the C/S was not using pills and alcohol because the C/S needed to make more money. Martin stated that Martin would provide the C/S with larger quantities and told the C/S that it would be “silly” for the C/S to get drunk or use pills and “mess it up” because “we got a good thing going” and if it continued the C/S “won’t even have to work and stuff.” Martin left the meeting location and was observed by surveillance agents to drive directly to his residence. The C/S provided the marijuana which he had obtained from Martin to law enforcement agents who field tested it with positive results.
19. During interviews with the C/S, the C/S stated that since November 2008 the C/S has called Martin on at least two occasions to tell Martin the C/S was ready for a delivery of marijuana and Martin would reply that Martin was at his residence and would be at the C/S’s location in approximately ten to fifteen

minutes which is the approximate time it takes to drive directly from Martin's residence to the meeting location. On at least another two occasions when the C/S called Martin to tell him that he was ready for a delivery of marijuana, Martin told the C/S that Martin would have to go by the Courthouse and "pick it up" and would meet the C/S at the usual location in ten or fifteen minutes. Martin also told the C/S on more than one occasion that if the C/S could locate any outdoor marijuana grow operations in Gallatin County that Martin would arrest the individuals and confiscate the marijuana. After the case was completed in court, Martin would then bring the confiscated marijuana to the C/S to sell instead of destroying it. Martin and the C/S would split the profits evenly on the sale of this marijuana as Martin would have "nothing" in the marijuana.

20. The C/S also advised law enforcement agents that Martin often utilizes a radio frequency detection device that has the appearance of a cellular telephone or pager to ensure that the C/S is not wearing a radio transmitting device when they meet.
21. On April 8, 2009, law enforcement agents conducted an interview with another confidential source (C/S 2). C/S 2 advised agents that, unknown to Martin, C/S 2 was present at the C/S's residence when Martin delivered the approximate two pounds of marijuana to the C/S on April 8<sup>th</sup> which has been referred to earlier in this affidavit in paragraph 2. C/S 2 stated that C/S 2 has known Martin for at least 20 years and positively identified Martin as the individual who delivered the marijuana. C/S 2 further stated that Martin delivered the marijuana in Martin's sheriff's department vehicle and described it as a black Ford Expedition.
22. During interviews with the C/S, the C/S stated that when he was first approached by Martin in approximately November 2008, Martin explained to the C/S that Martin could use his position as Sheriff of Gallatin County to protect the C/S from any criminal prosecution in Gallatin County. Martin further explained that Martin could also have the C/S prosecuted for any type of crime that Martin wished to "make up" if the C/S crossed Martin, stating that the States Attorney and Judges would believe Martin's word over the word of the C/S. The C/S further stated that on two different occasions the C/S has asked Martin about "getting out" of this relationship. On one of the occasions, Martin withdrew his service revolver from its holster, pointed it towards the C/S, and told the C/S that there was no "getting out." Martin told the C/S it would be "that easy," referring to Martin's sidearm to eliminate the C/S. On the other occasion, Martin also pulled his service revolver from its holster and laid on his lap and made a similar threat. Martin also told the C/S that Martin has a family and if Martin ever thought the C/S was informing on Martin, that Martin would make

the C/S "disappear." These threats occurred in January and February of 2009 and were the reason the C/S decided to cooperate with law enforcement agents.

23. Gallatin County is located within the Southern District of Illinois.
24. All of the information contained in this affidavit is based upon my personal knowledge and investigation (or that of my fellow agents), law enforcement, telephone, and business records, and on information from citizen witnesses whom I believe to be truthful and reliable.
25. Since this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of this criminal complaint, I have set forth only the facts sufficient to serve as a foundation for the issuance of the requested complaint. I have not listed all facts or information I or other agents have gathered, been told by informants or others, and/or personally observed.

**FURTHER AFFIANT SAYETH NAUGHT.**



\_\_\_\_\_  
GLENN H. ROUNTREE, Task Force Agent  
Drug Enforcement Administration

State of Illinois            )  
  ) SS.  
County of Washington )

Sworn to before me and subscribed in my presence on the 17 th day of May, 2009, at Nashville, Illinois.



\_\_\_\_\_  
PHILIP M. FRAZIER  
United States Magistrate Judge

**A. COURTNEY COX**  
United States Attorney



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**JAMES M. CUTCHIN**  
Assistant United States Attorney