

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of South Carolina

United States of America
v.
Edgar Jerome Melvin
a/k/a "EJ Melvin, a/k/a "Big Dog"

Case No. 3:10-501

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of *see below in the county of Lee in the
District of South Carolina, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Code Section: Title 21 USC Sections 846, 841(a)(1), and 841(b)(1)(A). Offense Description: Did knowingly and intentionally conspire with others, both known and unknown, to possess with intent to distribute cocaine and cocaine base (commonly known as "crack" cocaine), said conspiracy involving 5 kilograms or more of cocaine, and 50 grams or more of crack cocaine.

This criminal complaint is based on these facts:
See attached Affidavit of Special Agent Chris Garrett, FBI.

Continued on the attached sheet.

Chris Garrett
Complainant's signature
Special Agent Chris Garrett, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: April 29, 2010

Paige J. Gossett
Judge's signature

City and state: Columbia, South Carolina

Paige Jones Gossett, US Magistrate Judge
Printed name and title

AFFIDAVIT

Affiant, having been duly sworn, hereby deposes and states as follows:

1. Affiant is a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, and has served in that capacity since April 2005. Affiant is currently assigned to the White Collar Crime Squad with the Columbia Division of the FBI in Columbia, South Carolina. As a Special Agent of the FBI, Affiant is authorized to conduct investigations and make arrests for violations of Title 18 and Title 21 of the United States Code.
2. Affiant is submitting this Affidavit in support of the belief that the defendants named herein did knowingly and intentionally conspire to distribute controlled substances, specifically powder cocaine and crack cocaine. Evidence gathered to date indicate that the subjects listed below have conspired to distribute and possess with intent to distribute cocaine and "crack" cocaine in aggregate amounts totaling 5 kilograms or more of cocaine and 50 grams or more of "crack" cocaine. The following paragraphs are furnished to establish probable cause in support of the complaint. Affiant is familiar with this investigation through personal knowledge, the ongoing court authorized interception of wire communications, other law enforcement officers, and information obtained from a cooperating witness. Affiant has good reason to believe and does believe that all the information provided to him pertaining to this investigation is credible and true. This affidavit does not contain each and every fact known to Affiant regarding this investigation. For the purpose of establishing probable cause Affiant is relying only on the facts contained herein.
3. The FBI opened an investigation into Lee County Sheriff **Edgar Jerome Melvin**, a/k/a EJ Melvin, a/k/a Big Dog (hereinafter **Sheriff Melvin**) on December 1, 2006 based on information developed from two other FBI investigations. During the course of the investigation it was uncovered that **Sheriff Melvin** has been regularly protecting multiple drug dealers in Lee County. The FBI was successful in obtaining the court's authorization to intercept wire communications over the cellular telephones of two of those drug dealers, **Eric Hickmon** (hereinafter **Hickmon**) and **Larry Williams** (hereinafter **Williams**). On March 9, 2010, United States District Judge Cameron McGowan Currie signed an Order¹

¹In her Order dated March 10, 2010 authorizing interceptions occurring over the **Eric Hickmon** and **Larry Williams** phones, Judge Currie found that the facts presented in a wiretap affidavit subscribed to by the undersigned established probable cause to believe that certain defendants named herein (Defendants **EJ Melvin**, **Eric Hickmon**, **Larry Williams**, **Antonio Holloman**, **Anthony Williams**, **Sheldon Maurice Bradley**, and **Gary Bernard Ervin**) were engaged in a conspiracy to distribute cocaine and "crack" cocaine and were using the target telephones to assist them in their drug trafficking activities. In her Order dated March 26, 2010 authorizing interceptions over **Sheriff Melvin's** phone and in her subsequent Order authorizing continued interceptions over the **Eric Hickmon** and **Larry Williams** phones, Judge Currie made similar findings. In drafting this Affidavit in support of a Criminal Complaint, Affiant has summarized the information previously presented to Judge Currie, including but not limited to

authorizing the interception of wire communications began over **Hickmon's** and **Williams'** cellular telephones for a period of thirty days; on April 7, 2010, Judge Currie signed an Order allowing continued monitoring of wire communications and the interceptions are ongoing on both **Hickmon's** and **Williams'** telephones. Through the interceptions over these phones, sufficient probable cause was developed to intercept wire communications over **Sheriff Melvin's** cellular telephone. On March 26, 2010, Judge Currie signed an Order authorizing interception of wire communications over **Sheriff Melvin's** cellular telephone for a period of thirty days and. The interception of wire communications over **Sheriff Melvin's** telephone terminated on April 24, 2010. The criminal activity of each subject of this Affidavit is summarized below.

Edgar Jerome Melvin, a/k/a EJ Melvin, a/k/a Big Dog

4. A cooperating witness (hereinafter CW3) was interviewed on November 29, 2006. CW3 told the FBI that in approximately September 2006, CW3 went to the business place of a subject who is not named in this complaint to obtain cocaine. When CW3 arrived, the unnamed subject told CW3 that he had to wait for his connection, which CW3 understood as the unnamed subject's drug connection. A short time later, **Sheriff Melvin** arrived driving a gold Ford Expedition which belonged to the Lee County Sheriff's Office. CW3 recalled that the vehicle had dark tinted windows and blue lights in the grill of the vehicle. The unnamed subject got into **Sheriff Melvin's** vehicle, where he stayed for a short period of time. The unnamed subject then got out of **Sheriff Melvin's** vehicle carrying a white grocery store bag. After the unnamed subject got out of **Sheriff Melvin's** vehicle, **Sheriff Melvin** drove off. The unnamed subject then told CW3 to get in CW3's car. They both got into CW3's vehicle and the unnamed subject asked CW3 if CW3 wanted the usual, which was a "big eight" or 4.5 ounces of powder cocaine. CW3 responded in the affirmative and the unnamed subject opened the white grocery store bag, which contained a kilogram of powder cocaine wrapped in plastic. The unnamed subject asked if CW3 had a scale. CW3 had a scale which the unnamed subject used to weigh out a "big eight" of powder cocaine. CW3 paid for the powder cocaine and then left the premises. CW3 noted that the unnamed subject did not have anything in his possession prior to getting into **Sheriff Melvin's** vehicle.
5. CW3 also told the FBI that CW3 was aware of other individuals who paid bribes to **Sheriff Melvin** for the protection of their drug business. CW3 only knew the individuals by their nicknames, "Bread" and "Hawk."
6. Another cooperating witness (CW1) was put into contact with **Sheriff Melvin** through **Larry Williams, a/k/a Hawk** (hereinafter **Williams**) On October 20, 2009, CW1 went with **Williams** to **Eric Hickmon's** residence and conducted a controlled drug purchase of 6.99 grams of powder cocaine for \$300 from **Hickmon**. **Williams** acted as a middleman on this transaction. After **Williams** had returned from **Hickmon's** residence with the powder cocaine he told CW1 "if it wasn't for EJ (the name used by **Sheriff Melvin**), I wouldn't be

summaries of court-authorized interceptions. Affiant has not provided excerpts of all pertinent calls in this Affidavit, as there are hundreds of such calls.

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doing the things I do".²

7. Prior to developing CW1, another cooperating witness was developed by the FBI (hereinafter CW2). CW2 is an employee of the Lee County Sheriff's Office and is a law enforcement officer. During the initial stage of CW2's cooperation with the FBI, CW2 indicated that **Eric Hickmon** (hereinafter **Hickmon**) was an active drug dealer in Lee County and that CW2 was investigating **Hickmon** for drug violations. CW2 advised the FBI that he/she had suspicions as to **Hickmon's** relationship with **Sheriff Melvin**. On July 20, 2009, CW2 contacted the FBI and informed that CW2 had obtained a search warrant for **Eric Hickmon's** residence located at 1334 Herndon Road, Bishopville, South Carolina. On July 27, 2009, CW2 contacted the FBI and reported that CW2 had informed **Sheriff Melvin** about the upcoming search warrant to be executed at **Hickmon's** residence. CW2 told **Sheriff Melvin** about **Hickmon's** search warrant at approximately 12:15 p.m. on July 27, 2009. **Sheriff Melvin** verbally approved of the execution of the search warrant. This meeting between CW2 and **Sheriff Melvin** was consensually recorded by CW2. In the recording, CW2 can be heard telling **Sheriff Melvin** that he intended on searching **Eric Hickmon's** residence at 1334 Herndon Road for drugs and that the search warrant should be very successful. CW2 told **Sheriff Melvin** that he/she had **Hickmon** on video with drugs in his hands. **Sheriff Melvin** could be heard supporting CW2's efforts and recognizing where CW2 intended to execute the search warrant. During this first meeting between CW2 and **Sheriff Melvin**, **Sheriff Melvin** offered no objections to CW2's planned search warrant. **Sheriff Melvin** could be heard making sure that CW2 had enough people to assist in the execution of the search warrant.
8. CW2 called the FBI later on July 27, 2009 and advised that **Sheriff Melvin** had called CW2 at approximately 12:57 p.m. and asked CW2 to meet with him. At approximately 1:05 p.m., CW2 arrived at **Sheriff Melvin's** office. This meeting was also consensually recorded using an audio recording device. **Sheriff Melvin** told CW2 that as he was driving down the road, he realized who CW2 intended to execute the search warrant on the next day. **Sheriff Melvin** told CW2 that he knew **Eric Hickmon** by a different name and that **Hickmon** was an informant for **Sheriff Melvin**. **Sheriff Melvin** told CW2 that **Hickmon** had helped out with a previous investigation and that if the search were to be executed at **Hickmon's** residence, **Hickmon** would no longer want to cooperate. **Sheriff Melvin** admitted to CW2 that he knew that **Hickmon** smoked a lot of marijuana and then went on to direct CW2's efforts toward a separate investigation at a nightclub called "The Barn."
9. On March 15, 2010, **Williams** was captured on court-authorized interceptions using telephone number 803-607-4869 (hereinafter TARGET PHONE 2) speaking with **Sheriff Melvin** on telephone number 803-428-8894 (hereinafter TARGET PHONE 3). **Sheriff Melvin** told **Williams** to call his "man" in Lucknow who owes **Sheriff Melvin** a favor.

²In late November 2009, CW1 was successful in paying \$500 to **Sheriff Melvin** so that **Sheriff Melvin** would help him get out of a traffic ticket. **Williams** acted as a middleman on this transaction as well. CW1 used a body recorder equipped with both audio and video recording capabilities to record his interactions with **Williams** and **Sheriff Melvin**

Sheriff Melvin wanted to know if the man had seen a stolen 1997 Red Honda Civic with a black hood and a racing engine. **Sheriff Melvin** said he heard "them boys" from Lucknow were supposed to have one stashed in a field somewhere and were going to bring it out later. **Sheriff Melvin** told **Williams** to "call the man and tell him I need that." **Sheriff Melvin** also told **Williams** to "check on that other thing too while you are talking to him." **Williams** initially did not understand **Sheriff Melvin's** instructions, so **Sheriff Melvin** told **Williams** again to "check on that other thing too." **Williams** responded, "Ok, I got you" and the call ended.

10. On March 15, 2010, at 2:45 p.m., using TARGET PHONE 2, **Williams** spoke with an unnamed subject. **Williams** told the unnamed subject that "home boy had to tell me to call you" (referring to **Sheriff Melvin**). **Williams** provided the unnamed subject with details regarding the stolen Honda Civic previously provided by **Sheriff Melvin**. **Williams** advised the unnamed subject that "he tell me to call you and ask you about it, you know." **Williams** and the unnamed subject then discussed "Drew" Total Name Unknown (TNU). **Williams** stated that Drew TNU was supposed to come down on March 14, 2010 and "he was supposed to look out for me you know" (referring to Drew TNU supplying **Williams** with narcotics.). After discussing with the unnamed subject the fact that Drew TNU did not come to see either one of them, both **Williams** and the unnamed subject complained about how difficult it was to find drugs.
11. On March 15, 2010, at 5:28 p.m., using TARGET PHONE 2, **Williams** spoke with **Sheriff Melvin**, using TARGET PHONE 3. **Williams** informed **Sheriff Melvin** that his contact did not know anything about the stolen Honda Civic but would try and locate it. **Williams** told **Sheriff Melvin** that he asked the man about the "other thing." **Williams** then explained to **Sheriff Melvin** "...it's rough on this side man. It's rough around here." **Sheriff Melvin** asked **Williams** "You know anybody got some?" **Williams** responded "shit, that's the problem." **Sheriff Melvin** told **Williams** "It's in Atlanta or Florida then." **Williams** confirmed and said if he had "paper" or a decent vehicle he would already have gone. **Sheriff Melvin** responded "Yeah. I mean we got to figure out a way to get down there and get back." **Sheriff Melvin** asked **Williams** what it would take to "bring it back." **Williams** stated he did not know. **Sheriff Melvin** then told him "I got a way for somebody to go down there and come back." **Williams** told **Sheriff Melvin** "Shit, I'll go down there if there's something in the deal for me." **Melvin** responded "Alright, let me call you back." Affiant believes that **Sheriff Melvin** was attempting to use **Williams** to travel out of state and pick up illegal narcotics and bring them back to Lee County, South Carolina.
12. On March 20, 2010, at 11:05 a.m., using TARGET PHONE 2, **Williams** spoke with **Sheriff Melvin** using TARGET PHONE 3. **Sheriff Melvin** asked **Williams** "... listen, you know the Mexicans, you know they be bringing a lot of stuff right?" **Williams** acknowledged "Yeah," and **Melvin** asked **Williams** to find out when one of the **Mexicans** would be bringing "stuff" down. **Melvin** told **Williams** he would stop a **Mexican** and would "take their stuff...both their stuff and their money." Affiant believes **Sheriff Melvin** is referring to making a traffic stop on a Mexican trafficking narcotics and stealing the Mexican's drugs and drug money. **Williams** told **Melvin** he was aware of a Mexican who had been coming

around every couple of months. **Williams** told **Sheriff Melvin** he would try to find out when the Mexican would be coming through.

13. Court authorized interception of wire communications were initiated on **Sheriff Melvin's** cellular telephone, TARGET PHONE 3, on March 26, 2010 and were terminated on April 24, 2010. The interception of wire communications over **Sheriff Melvin's** telephone revealed that **Sheriff Melvin** regularly protects drug dealers from law enforcement activity and has extorted money from multiple drug dealers for his protection. The following telephone calls were all intercepted during the court authorized interception of wire communications of **Sheriff Melvin's** cellular telephone:
14. On March 29, 2010, at 2:57 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Williams** on TARGET PHONE 2. **Williams** asked **Sheriff Melvin** "...you know, y'all got **Roshell** this morning?" **Williams** was referring to **Roshell Brown** (hereinafter **Brown**), who was arrested on March 29, 2010 by the Lee County Sheriff's Office. **Sheriff Melvin** responded "Yeah." **Williams** asked "...on what?" **Sheriff Melvin** told **Williams** "just drugs" and that **Brown** also had "some stolen stuff." **Williams** said "...one of his cousins just left me, you know what I'm saying?" **Williams** further stated "... you know **Lucius**, you know about that ticket?" **Williams** was referring to **Lucius Delane**. **Sheriff Melvin** stated "yeah." **Williams** told **Sheriff Melvin** "...he came in to talk to you about that." **Williams** asked **Sheriff Melvin** "...when do you want to talk to me about it, or can you talk to me about it?" **Sheriff Melvin** said "Yeah...I'll call you back later on."
15. On March 29, 2010, at 5:19 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Williams** on TARGET PHONE 2. **Williams** asked **Sheriff Melvin** if it would be the "...morning before he gets out...?" Based on the context of the call, Affiant submits that **Williams** was referring to **Roshell Brown**. **Sheriff Melvin** responded "yeah." **Williams** asked "we gonna be able to party?" **Sheriff Melvin** told **Williams** "...I'm gonna go look and see..."
16. On March 29, 2010, at 7:37 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Williams** on TARGET PHONE 2. **Williams** told **Sheriff Melvin** "...his cousin had came over here today..." (meaning **Lucius Delane**). **Williams** talked to **Sheriff Melvin** about the arrest of **Roshell Brown** and the charges **Brown** was facing. **Williams** told **Sheriff Melvin** that **Delane** did not seem to think that coming up with "chips" would be difficult (meaning money). **Sheriff Melvin** said "I'm getting enough chips for me and you." **Sheriff Melvin** told **Williams** that **Brown** had "four or five" charges against him, so **Sheriff Melvin** said it will "take about five chips." **Sheriff Melvin** told **Williams** he would get one "chip" and **Sheriff Melvin** would get "four." **Sheriff Melvin** further stated "And that's, that's them big chips now, I ain't mean no little chips." Based on the context of the call and when considered in light of other evidence detailed herein, Affiant submits that **Sheriff Melvin** was expecting \$5,000 to intervene on behalf of **Brown** and reduce and/or remove his criminal charges. The FBI intercepted other telephone calls between **Williams** and **Sheriff Melvin** discussing the attempted extortion of **Brown** but ultimately it is believed by Affiant that **Brown** never made the payoff.

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17. On April 19, 2010, from approximately 4:00 p.m. until 5:10 p.m., **Sheriff Melvin** was interviewed by Affiant and Task Force Officer Cecil Jefferson Carter from SLED. Agents told **Sheriff Melvin** that they were investigating a number of drug dealers operating in Lee County; however, agents did not disclose the existence of the court-authorized interceptions. During the interview, a handwritten list of possible drug targets was provided to **Sheriff Melvin**. One of the possible targets listed was **Hickmon**. Contrary to the evidence summarized herein, **Sheriff Melvin** described **Hickmon** as only being involved in small time marijuana sales to support his (**Hickmon's**) own marijuana usage. After this interview took place, **Sheriff Melvin** began conducting numerous telephone calls in an effort to either tip off drug dealers about the FBI's interest in them or to extort money from them.
18. On April 19, 2010, at 6:25 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Larry Williams**, using TARGET PHONE 2. **Sheriff Melvin** told **Williams** that he had some very "important" news to tell him. **Sheriff Melvin** said it was for **Williams'** "eyes" and "ears" only. **Sheriff Melvin** said that **Williams** would need to talk to "two" people. **Sheriff Melvin** told **Williams** that "my man" should have come up with something because **Sheriff Melvin** thinks that person might be in "trouble." **Sheriff Melvin** was referring to Roshell Brown and meant Brown should have paid **Sheriff Melvin** to reduce and/or eliminate Brown's criminal charges. **Sheriff Melvin** also said that **Williams** had to talk to the other one, who **Sheriff Melvin** helped out with a ticket one time. **Williams** responded with the name "**Lucius**." **Sheriff Melvin** said he was stopping by to see **Williams** to discuss the news. Affiant believes **Sheriff Melvin** was going to conspire with **Williams** to extort money from these individuals for his protection.
19. On April 20, 2010, at 10:03 a.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Larry Williams** using TARGET PHONE 2. **Sheriff Melvin** told **Williams** "Yeah, **Lucius Anthony Delane**. Yeah that's him and tell him he was on there. I'm trying to help him off." In previously intercepted calls **Sheriff Melvin** asked **Williams** what **Delane's** full name was and **Williams** was intercepted on TARGET PHONE 2 obtaining that information from **Delane** himself. **Williams** told **Sheriff Melvin** during this call that **Delane** was with him at the time of the call. **Sheriff Melvin** asked **Williams** to confirm with **Delane** if he had the right name and **Williams** told **Sheriff Melvin** "Yeah, that's him." **Sheriff Melvin** responded "Ok, see what we can get out of him. Tell him we'll keep...the you know...off him. We'll try to lead them another way." **Williams** asked "Try to lead them another way?" **Sheriff Melvin** replied "Yeah, I mean you going to get something out him then." **Williams** answered "Yeah, let me see what he talking about." **Sheriff Melvin** said "Ok" and **Williams** committed to calling **Sheriff Melvin** back.
20. On April 20, 2010, at 10:34 a.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Larry Williams** using TARGET PHONE 2. **Williams** asked **Sheriff Melvin** "He need to know what he got to do man. Like I tell him I don't know, I got to you know. I mean...you know...what going on with him you know, is they coming at him or are you going to stop it or what?" **Sheriff Melvin** asked "Where is he at now?" **Williams** answered "He with me." **Sheriff Melvin** then said "No right now they are just um...they just inquiring, they fixing

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to check on him, but I kind of blowed them off like I didn't know. Tell him umm...if he got anything, that going to cost him. I mean to keep him off the..." **Sheriff Melvin** then abruptly ended the phone call telling **Williams** "Let me call you right back once I get out here."

21. On April 20, 2010, at 10:41 a.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Larry Williams** using TARGET PHONE 2. **Sheriff Melvin** told **Williams** "Listen, tell him I am supposed to meet with them again this week. But I can uhh..." **Sheriff Melvin** then had to pause because someone else was talking to him. **Sheriff Melvin** then asked "How much do you think he can come up with, about one or two? So I can try to keep them off. But I need...remember what I told you yesterday." **Sheriff Melvin** then told **Williams** "I can't say too much on the phone." **Williams** replied "Ok, I understand." **Sheriff Melvin** then continued "But tell him, they are going to call me. Because the big man...I mean the FBI and everybody." **Sheriff Melvin** then asked "What do you think we can...me and you could deal with, what do you say, we could deal with two?" **Williams** answered "yeah." **Sheriff Melvin** then asked "You think he got it?" **Williams** then asked **Sheriff Melvin** to hold on. When **Williams** returned to the call he told **Sheriff Melvin** "He say when you want it?" referring to **Lucius Delane** wanting to know when **Sheriff Melvin** wanted the money. **Sheriff Melvin** responded "Quick, sometime today." **Williams** could then be heard in the background relaying **Sheriff Melvin's** instructions. **Williams** then told **Sheriff Melvin** that he had to make some arrangements and the call ended shortly thereafter.
22. On April 20, 2010, at 10:58 a.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Larry Williams** using TARGET PHONE 2. **Williams** told **Sheriff Melvin** "It's a wrap." **Sheriff Melvin** said "huh?" **Williams** repeated "It's a wrap." **Sheriff Melvin** then began laughing. When **Sheriff Melvin** got back on the phone **Williams** told him "I got the two dollars." **Sheriff Melvin** and **Williams** then set up a meeting and the call ended. Based on the evidence gathered to date, Affiant believes that **Sheriff Melvin** and **Williams** were successful in extorting \$2,000 from **Lucius Delane**.
23. On April 20, 2010, at 12:11 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Eric Hickmon** using TARGET PHONE 1. **Sheriff Melvin** told **Hickmon** "Where you at anyway? I need to talk to you about something." **Hickmon** asked "What that?" **Sheriff Melvin** responded "No I ain't tell you over the phone but something I need to talk to you about" and "Somebody trying to put me and you together."
24. On April 20, 2010, at 12:59 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with an unnamed subject. Based on this call and previous intercepted calls the unnamed subject had just talked to **Antonio Holloman** about having to pay **Sheriff Melvin** for protection. **Sheriff Melvin** asked the unnamed subject "What he say?" The unnamed subject told **Sheriff Melvin** "He scared as shit. But he said whatever it takes I'm about to do it too." The unnamed subject further explained "OK, I told him, god damn, shit, you got some CIs, or some shit. You know what I am saying. I'm going to tell him whatever it takes for us to get that proper paper work in there. I said I'm going to give him at least 25 or three thousand dollars. He is scared as shit bro." **Sheriff Melvin** responded "I'm going to bring the FBI and

bring the paper in the car...SLED and the FBI, them boys got people working in. I'm going to tell **Tony** they got people working in. I told him I got them off you right now cause I told them you kind of shoot straight." **Sheriff Melvin** further explained to the unnamed subject what he planned on telling **Holloman** "Tony let me tell you this before I say anything. You know how you get now. I don't trust you because you are a weak link. You try call my name, anything, I swear they are going to find you because I ain't going to let you take me down."

25. On April 22, 2010, at 10:41 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Antonio Holloman**, using 803-229-0041. **Sheriff Melvin** told **Holloman** that he was supposed to go back to Florence at about 11 o'clock the next day to meet again with SLED and the FBI. **Sheriff Melvin** said he was to discuss "them 19 names written on that list. They supposed to add some more, take some off." **Sheriff Melvin** told **Holloman** that "they", referring to SLED and the FBI wanted to come back and do some work "over here", referring to Lee County. **Sheriff Melvin** told **Holloman** that the only name he was going to remove so far was an unnamed subject's name. **Sheriff Melvin** told **Holloman** that there were three names he was going to help take off the list and one of those names was **Holloman's**. **Sheriff Melvin** warned **Holloman** "I need to have something before I go there tomorrow. If there's nothing there, it's nothing I can do." **Sheriff Melvin** was trying to get **Holloman** to pay him to make sure that SLED and the FBI would not investigate him. Affiant believes that **Holloman** paid at least \$400 to **Sheriff Melvin** through an unnamed subject.
26. On April 23, 2010, at 10:17 a.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with **Eric Hickmon**, using TARGET PHONE 1. **Hickmon** said that he was "fixing to put something together" on the person that **Sheriff Melvin** told him about. **Sheriff Melvin** asked "what fella?" and **Hickmon** stated "M. O." Affiant believes that **Hickmon** was referring to **Sheldon Maurice Bradley, a/k/a Mo**. **Hickmon** said he was trying to figure out when "**Mo**" would be "straight" so that "we" could go and "get it." **Sheriff Melvin** said that he wanted to "get it when it's in the car." **Sheriff Melvin** said that he wanted to do a regular "traffic stop" and "take it from him." **Sheriff Melvin** said that he would "give" **Hickmon** part of it and then turn the rest in. **Sheriff Melvin** said they would try that first, but if that did not work he could "get the house." The FBI believes **Sheriff Melvin** meant he could find out from **Hickmon** when **Bradley** was transporting powder cocaine. **Sheriff Melvin** could then conduct a traffic stop on **Bradley** and confiscate the narcotics. Affiant believes that **Sheriff Melvin** would turn part of the cocaine over to **Hickmon** and turn part of the cocaine in as evidence against **Bradley**.
27. On April 23, 2010, at 3:24 p.m., using TARGET PHONE 3, **Sheriff Melvin** spoke with Your Affiant and SLED Agent and TFO Carter, using telephone number 803-609-3105. SA Garrett and TFO Carter called **Sheriff Melvin** to inquire about any knowledge **Sheriff Melvin** might have about **Larry Williams, a/k/a Hawk**. Before being asked about **Williams**, **Sheriff Melvin** provided information on a white male, possibly named "Don" who was an active drug dealer in Lee County. **Sheriff Melvin** advised that a female complainant

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had recently provided him information about "Don."³ **Sheriff Melvin** indicated that his guys have never been able to catch "Don" and that he believed "Don" was using the old Ford dealership in Bishopville as a front for his illegal activity. After discussing "Don," TFO Carter told **Sheriff Melvin** that he came across an old informant file that indicated there was an older drug dealer named **Larry** who goes by the street name "**Hawk**." **Sheriff Melvin** said "I know him. No he...he like a old washed up man." **Sheriff Melvin** continued "I heard that he used to to" referring to **Sheriff Melvin** believing that "**Hawk**" previously was a drug dealer. **Sheriff Melvin** went on to tell agents that he thought **Hawk's** true name is **Larry Williams** and that **Williams** was having significant financial difficulty. According to **Sheriff Melvin**, **Williams** has no vehicle and has recently had his power cut off. **Sheriff Melvin** also indicated that **Larry Williams** was close to Larry Henry. Your Affiant asked if **Sheriff Melvin** thought **Williams** would make a good informant and **Sheriff Melvin** responded "Not this Larry. Not neither one." **Sheriff Melvin** indicated that he did not think they, referring to **Williams** and Henry, would work. **Sheriff Melvin** then began to tell Your Affiant and TFO Carter about "a good guy" that he believed would make a good informant. After redirecting the conversation back to **Larry Williams**, TFO Carter asked if **Sheriff Melvin** knew where "**Hawk**" lived or if **Sheriff Melvin** saw him. **Sheriff Melvin** said "I see him a lot at the store. Because he's up at the store when I get there. He'll probably either catch a ride or walk to the store." **Sheriff Melvin** told agents that he believed that **Williams** only had about \$20 in his "pocket." Affiant said: "Hey Sheriff, it sounds like you know him a little bit but you only see him in the store, is that right?" **Sheriff Melvin** responded that when he (**Sheriff Melvin**) goes to the store he runs his mouth for a few minutes and then leaves. Affiant then asked "You wouldn't happen to have a phone number for him?" referring to **Larry Williams**. **Sheriff Melvin** responded "No." After telling Affiant and TFO Carter that he did not know **Williams'** telephone number, **Sheriff Melvin** was subsequently intercepted on multiple occasions on **Williams'** cellular phone, TARGET PHONE 2—and, as noted herein, **Sheriff Melvin** had been previously intercepted on numerous occasions over **Williams'** cellular phone; therefore, **Sheriff Melvin** clearly lied to federal and state agents about **Williams**. **Sheriff Melvin** has recently started calling **Williams** using a different telephone number, 803-229-0503. In other recently intercepted telephone calls, **Williams** has indicated that **Sheriff Melvin** told him that the FBI had expressed an interest in him.

**Eric Hickmon, a/k/a Eric Hickman, a/k/a Weasel, a/k/a Drak; and
Brenda Lashawn Ellerby a/k/a Shawn**

28. In an interview conducted with a cooperating witness (CW4) on January 20, 2009, CW4 provided information that he/she had regularly been fronted powder cocaine by **Eric Hickmon**. CW4 indicated that **Hickmon** fronted CW4 one to two ounces per week, approximately one to three times per week for seven months during 2006. Based on CW4's

³In previously intercepted telephone calls, **Sheriff Melvin** has been intercepted discussing an attempt to provide information on other drug dealers to divert FBI and SLED's attention from drug dealers affiliated with **Sheriff Melvin** and his co-conspirators.

statement, it can be conservatively estimated that **Hickmon** was providing CW4 with six ounces of powder cocaine a month, for a total estimate of 1,176 grams.

29. As noted in paragraph 6 above, after CW1 conducted his/her first controlled purchase of powder cocaine from **Eric Hickmon** through **Larry Williams** on October 20, 2009. Also as noted in paragraphs 7-8, 17, and 23, **Sheriff Melvin** appears to be protecting **Hickmon** from law enforcement activity. As noted in paragraph 26, **Sheriff Melvin** and **Hickmon** have been intercepted conspiring to steal drugs from **Sheldon Maurice Bradley, a/k/a Mo** under the guise of a legitimate law enforcement traffic stop.
30. CW1 continued to make controlled purchases of powder cocaine from **Hickmon**. From October 20, 2009 through March 17, 2010, CW1 purchased approximately an aggregate amount of 497 grams of powder cocaine from **Hickmon** on over 13 different occasions. Beginning in January 2010, CW1 was able to make the cocaine purchases directly from **Hickmon**. Each controlled drug purchase from **Hickmon** took place at **Hickmon's** residence.
31. On November 5, 2009, the FBI installed a pole camera in the vicinity of **Hickmon's** residence. The pole camera has regularly recorded activity indicative of drug trafficking occurring at **Hickmon's** residence.
32. On March 18, 2010, at 6:53 p.m., using 803-720-8492 (hereinafter TARGET PHONE 1), **Hickmon** spoke with **Brenda Lashawn Ellerby, a/k/a Shawn** (hereinafter **Ellerby**), using International Mobile Subscriber Identification number (IMSI) number 316010151662170. **Hickmon** instructed **Ellerby** "Look in that drawer, there be three bags in there. The one that weigh the most and weigh out a 3.5. White boy Johnny coming there and get it." Affiant believes that **Hickmon** was instructing **Ellerby** to weigh out 3.5 grams of powder cocaine and subsequently provide it to a white male named Johnny.
33. On March 20, 2010, at 4:21 p.m., using TARGE PHONE 1, **Hickmon** spoke with **Gary Bernard Ervin, a/k/a G. Ervin** asked **Hickmon** if "you good with the lady?" and "you good with the girl?" The term "lady" and "girl" refer to cocaine. **Ervin** told **Hickmon** "... I got a couple of them." **Ervin** meant he had a couple of ounces of cocaine. **Hickmon** responded "I just have a little something, soon as I get rid of it, I'll hit you up."
34. On March 26, 2010, at 7:51 p.m., using TARGET PHONE 1, **Hickmon** spoke with **Antonio Holloman** using IMSI 316010151678694. **Hickmon** told **Holloman** that he was "...sitting here weighing this stuff up..." **Hickmon** asked **Holloman** "how many of them things you need?" **Holloman** said he needed about "ten of them." Affiant believes **Holloman** meant 10 ounces of powder cocaine.
35. On March 31, 2010, at 4:46 p.m., using TARGET PHONE 1, **Hickmon** spoke with **Sheldon Maurice Bradley, a/k/a Mo** (hereinafter **Bradley**), using telephone number 803-229-0992. **Hickmon** said he heard **Bradley** was "good." **Bradley** confirmed saying "yeah, yeah everything's good." **Bradley** was confirming with **Hickmon** that he had drugs to sell. **Bradley** also told **Hickmon** "Yeah, I'm good on that girl too now Weezy" indicating that

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Bradly had both powder cocaine and crack cocaine. **Hickmon** asked "Shit. What you let me get two of them things for?" **Bradley** replied "I'm letting the things go for the stack" meaning that **Bradley** was willing to sell an ounce of powder cocaine for \$1,000. **Hickmon** then told **Bradley** that he would be there shortly.

36. On April 1, 2010, at 9:13 a.m., using TARGET PHONE 1, **Hickmon** spoke with **Holloman** using Universal Fleet Mobile Identification (UFMI) number 150*893*13556. **Hickmon** bragged to **Holloman** that when he went to **Bradley's** house the night before, **Bradley** had "cookies all on that stove", meaning that **Bradley** had multiple cookies of crack cocaine on his stove. **Hickmon** also told **Holloman** that **Bradley** let him purchase three cookies of crack cocaine for a "stack" or \$1,000.
37. On April 2, 2010, at 6:46 p.m., using TARGET PHONE 1, **Hickmon** spoke with **Ellerby**, using IMSI number 316010151662170. **Hickmon** told **Ellerby** "Hey, uh Kari on the way. She want three grams. Give her three grams out of that bag in that top cabinet. And Todd on the way, give him point six." **Hickmon** confirmed with **Ellerby** "You hear me?" **Ellerby** replied "Yeah."⁴
38. On April 2, 2010, at 7:30 p.m., using TARGET PHONE 1, **Hickmon** spoke with **Ellerby**, using IMSI number 316010151662170. **Hickmon** told **Ellerby** "You have to put it outside somewhere. Put it in the umm...black grill. Get that umm...I have a little twenty dollars in there. Get it out. Get that twenty dollars out of that black grill. Put that six grams in there. Kari ain't leave out of Camden yet." **Ellerby** responded "Alright."⁵
39. On April 15, 2010, at 10:56 a.m., using TARGET PHONE 1, **Hickmon** spoke with **Gary Bernard Ervin, a/k/a G**, using UFMI Number 150*722*1248. **Ervin** asked **Hickmon** what time **Hickmon** was going to be free. **Hickmon** told him "about a hour or so." **Ervin** then told **Hickmon** "I need you to do that thing for me. A little fourteen for me right fast" referring to 14 grams of powder cocaine. **Hickmon** replied "10-4."

⁴The pole camera that was operating in the vicinity of **Hickmon's** and **Ellerby's** residence captured activity confirming that **Ellerby** followed through on **Hickmon's** instructions. At approximately 7:10 p.m., an unnamed subject arrived at **Hickmon's** and **Ellerby's** residence located at 1334 Herndon Road, Bishopville, South Carolina. At 7:12 p.m., the unnamed subject was surveilled departing from **Hickmon's** and **Ellerby's** residence. At 7:13 p.m., **Ellerby** was surveilled moving a Black Chevrolet Tahoe from the front of the residence to the side of the residence.

⁵The pole camera that was operating in the vicinity of **Hickmon's** and **Ellerby's** residence captured activity confirming that **Ellerby** followed through on **Hickmon's** instructions. At approximately 7:30 p.m., **Ellerby** was surveilled exiting a black Chevrolet Tahoe at her residence and walking to the area on the lot where the black grill that **Hickmon** was previously referring to was located.

40. On April 17, 2010, using TARGET PHONE 1, **Hickmon** spoke with **Ervin**, using UFMI 150*722*1248. **Ervin** had traveled to Atlanta, Georgia and told **Hickmon** that he was going to love the "shit" he was bringing back. **Ervin** was surveilled via the pole camera in place near **Hickmon's** residence when he returned from Atlanta. **Ervin** transferred three pieces of luggage from a vehicle he shared with an unknown female into a black Toyota Camry that he is known to use.
41. On April 23, 2010, using TARGET PHONE 1, **Hickmon** spoke with **Ervin**, using UFMI number 150*722*12478. **Ervin** told **Hickmon** that "I need to get seven of that thing if you got it." Your Affiant believes that **Ervin** was asking **Hickmon** to supply him with at least seven grams of powder cocaine. **Hickmon** told **Ervin** to give him about 30-45 minutes.

Larry Williams a/k/a Hawk

42. In an interview conducted with a cooperating witness (CW5) on April 8, 2008, CW5 indicated that CW5 purchased crack-cocaine on eight occasions from a man CW5 knew as **Larry Last Name Unknown a/k/a "Hawk"**. CW5 purchased the crack-cocaine from "**Hawk**" during the time period of May to June 2007 eight times. CW5 estimated that CW5 purchased one ounce of crack-cocaine from "**Hawk**" on each occasion. Based on CW5's statement, CW5 purchased approximately 224 grams of crack cocaine from **Larry Williams, a/k/a Hawk**.
43. As noted in paragraphs 5, 9-12, 14-16, 18-22, and 27 above, **Williams** has acted as a middle man for **Sheriff Melvin** in **Sheriff Melvin's** attempts to acquire illegal narcotics as well as extort other drug dealers for payment to protect them from law enforcement.
44. On March 23, 2010, at 3:58 p.m., using TARGET PHONE 2, **Williams** spoke with **Lucius Delane** (hereinafter **Delane**), using telephone number 864-444-9138. **Delane** was looking for powder cocaine and **Williams** told him that an unnamed subject or **Williams'** cousin may have it. **Williams** told **Delane** that the unnamed subject wanted "12," but **Williams** did not know what his cousin was charging. **Williams** was referring to the unnamed subject charging \$1,200 for an ounce of cocaine. **Delane** asked **Williams** "how much he want for a half?" **Delane** wanted to know what the unnamed subject charged for a half ounce of cocaine (14 grams). **Williams** said he did not know and the two of them talked about stopping by to see the unnamed subject later in the day.
45. On March 23, 2010, at 5:34 p.m., using TARGET PHONE 2, **Williams** spoke again **Delane**, using telephone number 864-444-9138. **Williams** asked **Delane** if he was still coming. **Delane** told him he was still coming. **Delane** then asked **Williams** "You had talked to him?" **Williams** replied "No. Why you want me to call him?" **Delane** told **Williams** "Yeah, because I got a couple people want to know how much he'll let a half one of those things go for?" **Williams** asked "You talking about one eight" referring to at least 4.5 ounces of powder cocaine or what is commonly referred to as a "Big Eight." **Delane** said "Yeah."
46. On March 23, 2010, using TARGET PHONE 2, **Williams** spoke with the same unnamed

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subject referenced in paragraph 45 of this complaint. Williams asked the unnamed subject if he remembered "Lucius", the unnamed subject indicated he did. Williams told the unnamed subject "He supposed to be coming over here. I don't know if he want nine or what, but you know. But when he get here, we're going to call you back." The unnamed subject responded "He want nine onions?" referring to nine ounces of powder cocaine. Williams replied "yeah." The unnamed subject told Williams "I can't touch that til the morning. I've got to get it from my peoples 'cause that shit so high right now I don't be trying to get nothing but like 15, 16 of them shit at a time." Affiant believes that that the unnamed subject meant he could only get 15 to 16 ounces of powder cocaine at a time from his supplier.

47. On March 25, 2010, at 1:47 p.m., using TARGET PHONE 2, Williams spoke to **Anthony Williams, a/k/a Maybelle** (hereinafter **Maybelle**). **Maybelle** told Williams "I need two of them..." Based on the call, Affiant believes that **Maybelle** was referring to two ounces of powder cocaine. Williams told **Maybelle** that he would check for him and call him back.
48. On April 6, 2010, at 3:59 p.m., using TARGET PHONE 2, **Larry Williams** spoke with **Antonio Holloman**. Williams asked **Holloman** if he had the "girl" referring to powder cocaine. **Holloman** replied "yeah" but he said the price was "still high." Williams said "what are talking about 12?" **Holloman** replied "yeah 12." Williams asked "all in one piece?" **Holloman** responded "yeah, mostly." Williams was asking whether the cocaine was solid and of good quality/purity. Williams told **Holloman** that he would make a call to find out what he was going to do.

Antonio Holloman a/k/a Tony Holloman

49. On May 1, 2008, CW5 conducted a controlled drug purchase from **Antonio Holloman, a/k/a Tony Holloman**. CW5 purchased 16.74 grams of crack cocaine from **Holloman**.
50. As noted in paragraphs 24-25, 34, 36, and 48 above, **Holloman** has conspired to sell cocaine with **Hickmon** and **Williams** and has paid **Sheriff Melvin** for his protection from law enforcement activity.
51. On April 1, 2010, **Holloman** using UFMI 150*893*13556, was intercepted speaking with **Eric Hickmon** on TARGET PHONE 1. Based on the context of the call, Affiant submits that both men were discussing the drugs that **Sheldon Maurice Bradley** had the night before. This intercepted call was a call that took place after a previously referenced call in paragraph 36 of this complaint. **Holloman** told **Hickmon** "Damn should have gotten me one of them things boy." **Hickmon** responded "I hit him up." and "I hit his ass up and see if he's got some more."

Anthony Williams a/k/a Maybelle

52. On August 6, 2009, a cooperating witness (CW6) of the FBI purchased 45.18 grams of crack cocaine and 6.25 grams of powder cocaine from **Maybelle**.

53. As noted in paragraph 47 above, **Maybelle** has been intercepted conspiring to acquire multiple ounces of powder cocaine through **Williams**.
54. On April 2, 2010, **Maybelle** was intercepted using telephone number 803-934-6216 speaking with **Williams** using TARGET PHONE 2. **Maybelle** asked **Williams** "How's the weather?" **Williams** told him "It was a little rough yesterday. I can ummm...I can make some calls." **Maybelle** told **Williams** "I'm waiting on you." **Williams** then asked **Maybelle** "What, about Four? Two?" **Maybelle** told **Williams** "Man, shit, depends on the number. It'll be four. Two to four. Depends on the number." Based on the context of the call, Affiant submits that **Maybelle** was telling **Williams** that it depended on how much an ounce of cocaine would cost him as to how much he could purchase. **Williams** told **Maybelle** "Alright. I'm going to hit you back in a few."
55. **Maybelle** has three prior drug convictions.

Sheldon Maurice Bradley a/k/a Mo

56. On December 9, 2009, at approximately 1:56 p.m, another cooperating witness (hereinafter CW6) conducted a controlled drug purchase of 10.28 grams of crack-cocaine from **Sheldon Maurice Bradley a/k/a Mo** for \$420. CW6 paid an unnamed subject \$50 for setting up the deal. This transaction was consensually recorded using both an audio and video device. **Bradley** can briefly be seen on the video.
57. As noted in paragraph 35, **Bradley** has been intercepted conspiring to sell cocaine to **Hickmon**.
58. On April 2, 2010, at 2:50 p.m., **Bradley**, using telephone number (803)403-5141 was intercepted talking to **Larry Williams**, using TARGET PHONE 2. **Williams** asked **Bradley** how the weather was, in reference to whether or not **Bradley** had any drugs available. **Bradley** responded "Alright." **Williams** then asked **Bradley** "What you on this end?" **Bradley** responded "You know my spot." **Williams** then said "Ok. Hey, I'm going to call you back in a few minutes. Hey you got both?" Based on the context of the call, Affiant submits that **Williams** was asking if **Bradley** had two types of drugs, possibly cocaine and "crack" cocaine or cocaine or marijuana. **Bradley** confirmed that he had both and **Williams** told him he would call him back.

Gary Bernard Ervin a/k/a G

59. On or about September 2009, a cooperating witness (hereinafter CW1) was developed by the South Carolina Law Enforcement Division (SLED) and the FBI. CW1 conducted two controlled drug evidence purchases from **Gary Bernard Ervin, a/k/a G**. An unnamed subject acted as a middleman on both of these drug purchases from **Ervin**. In the first controlled drug purchase CW1 purchased 55.5 grams of powder cocaine from **Ervin** on October 5, 2009. CW1 purchased 81.71 grams of powder cocaine from **Ervin** on October 13, 2009.

60. As noted in paragraphs 33, 39-41 above, **Ervin** and **Hickmon** have been intercepted conspiring to distribute cocaine.
61. On April 1, 2010, at 12:26 p.m., **Ervin**, using UFMI number 150*722*1248 was intercepted speaking with **Hickmon** using TARGET PHONE 1. **Ervin** asked **Hickmon** "Big Dog. How many of them things you had needed?" referring to how many ounces of powder cocaine **Hickmon** needed. **Hickmon** replied "I might get two later on because yesterday afternoon I got one from this dude." **Ervin** responded "Ok. Ok." **Hickmon** then said "I'm waiting on a couple more calls. I'll be calling in." **Ervin** ended the conversation by saying "10-4."
62. **Ervin** has two prior drug convictions.

Lucius Anthony Delane

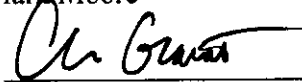
63. As noted in paragraphs 44-45 above, **Delane** has conspired with **Williams** to distribute cocaine with **Williams**. Also noted in paragraphs 19-22 above, **Delane** has paid off **Sheriff Melvin**, through **Williams**, for **Sheriff Melvin's** protection from law enforcement.
64. On April 19, 2010, **Delane** was intercepted using telephone number 843-472-2770 speaking with **Williams** using TARGET PHONE 2. **Williams** told **Delane** that "shit is fixing to hit the fan my brother." **Williams** told **Delane** that he didn't want to talk about what was going on over the phone and told **Delane** about a list, referring to the handwritten list of potential subjects that was provided to **Sheriff Melvin** previously that day. **Williams** told **Delane** that he knew he (**Williams**) was not on the list but that he needed **Delane's** full name to verify whether or not **Delane** was included on the list. During this call, **Delane** provided **Williams** his full name. As noted in paragraphs 46-47 above, it is believed by Your Affiant that **Delane** was convinced by **Williams** that **Delane** had to pay \$2,000 to **Sheriff Melvin** so that **Sheriff Melvin** would offer him protection.

Based on the above mentioned historical statements, controlled drug purchases and the volume of drug activity intercepted on **Hickmon's** and **Williams'** telephones, Your Affiant believes that the evidence gathered to date indicates that the listed defendants have conspired to distribute cocaine and "crack" cocaine in aggregate amounts totaling 5 kilograms or more of cocaine and 50 grams or more of "crack" cocaine. **Hickmon** has been involved in controlled drug purchases totaling approximately 497 grams of powder cocaine. In a statement provided by CW4, **Hickmon** was associated with the sale of over a kilogram of powder cocaine during a seven month time frame. As noted above, in one statement provided by a cooperating witness, CW5, **Williams** is linked to the sale of approximately 224 grams of "crack" cocaine. Moreover, as detailed above, **Sheriff Melvin** was involved with an unindicted coconspirator who was dealing in kilogram quantities of cocaine as far back as 2006 (see Paragraph 4 above) and agents have made controlled purchases of "crack" cocaine from various co-conspirators in an aggregate amount of well over 50 grams or "crack" cocaine (see Paragraphs 49, 52 and 56 above) Based on the wire intercepts **Williams** is also routinely engaged in the trafficking of powder cocaine and "crack" cocaine. These historical totals coupled with **Hickmon's** and **Williams'** routine trafficking of cocaine that has been intercepted over

their cellular telephones provide Your Affiant with evidence that **Hickmon, Williams** and those that deal drugs with them and protect them have been involved in a conspiracy to distribute cocaine in an aggregate amount of 5 kilograms or more and "crack" cocaine in an aggregate amount of 50 grams or more.

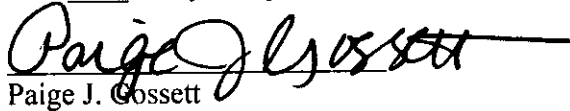
Based on the above facts and circumstances, Affiant requests that arrest warrants be issued for **Edgar Jerome Melvin, a/k/a EJ Melvin, a/k/a Big Dog; Eric Hickmon, a/k/a Eric Hickman, a/k/a Drak, a/k/a Weasel, a/k/a Weezy; Larry Williams, a/k/a Hawk; Brenda LaShawn Ellerby; Antonio Holloman, a/k/a Tony Holloman; Anthony Williams, a/k/a Maybelle; Sheldon Maurice Bradley, a/k/a Mo; Gary Bernard Ervin, a/k/a G; and Lucius Anthony Delane** for conspiracy to distribute cocaine and crack cocaine in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A).

This Affidavit has been reviewed by AUSA Mark Moore



Special Agent Christopher P. Garrett
Federal Bureau of Investigation

Sworn to and subscribed before me
This 29 th day of April 2010.



Paige J. Gossett
United States Magistrate Judge