

# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

**GREGORY DALE SCOTT**

CASE NUMBER: 05-3082MB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about February 11, 2004, through and until August 15, 2005 in Putnam county, in the

Middle District of Tennessee defendant(s) did, (Track Statutory Language of Offense)

combine, conspire, confederate, and agree with each other and with others known and unknown, to knowingly and willfully conduct or attempt to conduct a financial transactions affecting interstate or foreign commerce involving property represented by law enforcement officer, to be proceeds of specified unlawful activity, to wit: the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1);

a) With intent to promote the carrying on of specific unlawful activity, that is, the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1); and

b) To conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1);

in violation of Title 18 United States Code, Section(s) and 1956(h). I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof:

Yes  No  
Bart L. Brown  
Signature of Complainant

Sworn to me and subscribed in my presence,

August 16, 2005  
January 3, 2005  
Date

at Nashville, Tennessee  
City and State

JOE B. BROWN  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

**ROBIN BLASKIS**

CASE NUMBER: 05-3081MB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 11, 2004, through and until August 15, 2005 in Putnam county, in the

Middle District of Tennessee defendant(s) did, (Track Statutory Language of Offense)

combine, conspire, confederate, and agree with each other and with others known and unknown, to knowingly and willfully conduct or attempt to conduct a financial transactions affecting interstate or foreign commerce involving property represented by law enforcement officer, to be proceeds of specified unlawful activity, to wit: the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1);

a) With intent to promote the carrying on of specific unlawful activity, that is, the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1); and

b) To conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1);

in violation of Title 18 United States Code, Section(s) 1956(h). I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof:

Yes  No  
Bart L. Brown  
Signature of Complainant

Sworn to me and subscribed in my presence,

August 16, 2005  
January 3, 2005  
Date

at Nashville, Tennessee  
City and State

JOE B. BROWN  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

RONALD MIDDLEBROOK

CASE NUMBER: 05-3079MB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2003 through and until August 15, 2005 in Putnam county, in the

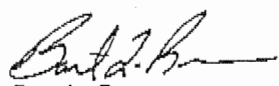
Middle District of Tennessee defendant(s) did, (Track Statutory Language of Offense)

combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute and to knowingly and intentionally distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1) and 846. I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof:  Yes  No

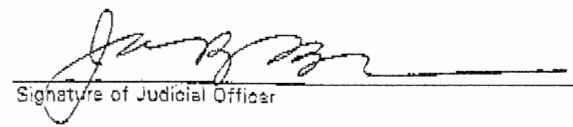
  
Bart L. Brown  
Signature of Complainant

Sworn to me and subscribed in my presence,

August 16, 2005  
January 3, 2005  
Date

at Nashville, Tennessee  
City and State

JOE B. BROWN  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

  
Signature of Judicial Officer



# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

**TROY BELL**

CASE NUMBER: 05-3080MB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2003 through and until August 15, 2005 in Putnam county, in the

Middle District of Tennessee defendant(s) did, (Track Statutory Language of Offense)

combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute and to knowingly and intentionally distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1) and 846. I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof:  Yes  No

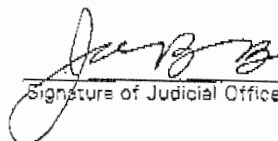
  
Bart L. Brown  
Signature of Complainant

Sworn to me and subscribed in my presence,

August 16, 2005  
January 3, 2005

at Nashville, Tennessee  
City and State

JOE B. BROWN  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

STEVEN BERT WILLIAMSON

CASE NUMBER: 05-3077MB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2003 through and until August 15, 2005 in Putnam county, in the

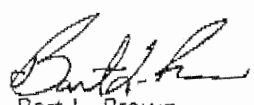
Middle District of Tennessee defendant(s) did, (Track Statutory Language of Offense)

combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute and to knowingly and intentionally distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1) and 846. I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof:  Yes  No


  
Bart L. Brown  
Signature of Complainant

sworn to me and subscribed in my presence,

August 16, 2005  
~~January 3, 2005~~

at Nashville, Tennessee  
City and State

E. B. BROWN  
JUDICIAL STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

**RENO MARTIN**

CASE NUMBER: 05-3076MB

(Name and Address of Defendant)

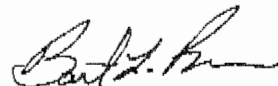
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2003 through and until August 15, 2005 in Putnam county, in the Middle District of Tennessee defendant(s) did, (Track Statutory Language of Offense)

combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute and to knowingly and intentionally distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1) and 846. I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.


Continued on the attached sheet and made a part hereof:  Yes  No

  
Bart L. Brown  
Signature of Complainant

Sworn to me and subscribed in my presence,

August 6, 2005 at Nashville, Tennessee  
Date City and State

JOE B. BROWN  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

## Statement in Support of Criminal Complaint

### INTRODUCTION

I, Bart L. Brown, being duly sworn, do hereby depose and state:

I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the Cookeville Resident Office. I have been employed by the FBI for the last ten years. During this time I have been assigned to investigate, among other criminal matters, drug trafficking, money laundering, firearms violations, public corruption, and organized crime. I make this statement based upon personal knowledge derived from my participation in this investigation as well as information provided to me by other law enforcement officers. Where conversations are related herein, they are related in substance and in part. Furthermore, this statement does not contain all of the information known to me regarding this investigation, but only what is sufficient to establish probable cause in support of a criminal complaint.

I submit this affidavit for the arrest of Reno Martin, Steven Bert Williamson, Ronald Middlebrook, Darrell Thomas Jones, and Troy Bell, for the charges of conspiracy to knowingly and intentionally possess with the intent to distribute and to knowingly and intentionally distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21 United States Code, Section(s) 841(a)(1) and 846.

I further submit this affidavit for the arrest of Robin Blaskis, and Gregory Dale Scott, for the charges of conspiracy to knowingly conduct or attempt to conduct a financial transactions affecting interstate or foreign commerce involving property represented by law enforcement officer, to be proceeds of specified unlawful activity, to wit: the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1);

a) With intent to promote the carrying on of specific unlawful activity, that is, the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1); or

b) To conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, the distribution of controlled substances, as defined in Title 21, United States Code, Section 841(a)(1);

in violation of Title 18 United States Code, Section 1956(h).

On or about September of 2002, the Federal Bureau of Investigation (FBI) and Tennessee Highway Patrol (THP/CID) developed an undercover operation in order to investigate and root out corruption. Through the use of an undercover FBI agent (UCE), posing as a member of a Chicago based drug trafficking/money laundering organization, subjects of this investigation were given the opportunity to participate in a scheme to defraud auto insurance companies for profit. The scheme require that body shop estimate reports and police accident reports, prepared by police officers, be fraudulently

and fictitiously prepared and provided to, what was believed to be the Chicago based drug trafficking organization. It was further believed that these reports were subsequently submitted to auto insurance company as support for claims worth thousands of dollars. For these purposes, on numerous occasions, the UCE provided to the subjects of this investigation, information and descriptions of specific vehicles. Subjects of this investigation had access to automobile repair shops, would prepare fictitious estimate reports at repair cost of thousands of dollars, and recruited police officers to prepare fraudulent police accident reports. These reports were thereafter provided to the UCE, believing that same were being submitted to insurance companies as claims, in return for payment. These individual and the police officers that they recruited, received payment for the above acts.

The subjects of this investigation included; (1) Reno Martin, a police officer with the Cookeville City Police Department, in Cookeville, Tennessee, at various times assigned to road patrol, Drug Task Force, and Community Nuisance Eradication, (2) Steven Bert Williamson, a police officer previously with the Algood City Police Department, in Algood Tennessee, and now with the Tennessee Technological University Police Department, in Cookeville, Tennessee, (3) Gregory Dale Scott, a Jailer with the Putnam County Sheriff's Office, in Cookeville, Tennessee, (4) Darrell Thomas Jones, (5) Ronald Middlebrook, (6) Troy Bell, and (7) Robin Blaskis, a Certified Public Accountant, in Cookeville, Tennessee.

Believing that the UCE was a member of a Chicago based drug trafficking organization, Darrell Thomas Jones and Ronald Middlebrook offered their services in assisting to transport, or recruit law enforcement officers to transport, thousands of dollars, in United States Currency, believed to be proceeds of illegal narcotics trafficking and/or to transport multi-kilogram quantities of cocaine. Additionally Ronald Middlebrook and Robin Blaskis offered their services in order to launder thousands of dollars, in United States Currency, represented to be proceeds of illegal narcotics trafficking.

The law enforcement officers involved in the transportation of U.S. Currency and purported cocaine included Reno Martin, and Steven Bert Williamson. Gregory Dale Scott was involved in the transportation of United States currency to a co-conspirator that was subsequently laundered.

The above named subjects reached an agreement for the purpose of laundering what was believed to be proceeds of drug trafficking, through established businesses in Tennessee, using the official position of law enforcement officers to transport United States currency believed to be narcotics trafficking proceeds, and to transport multi-kilogram quantities of cocaine.

The following represents incidents wherein the defendants engaged in specific instances of the above illegal activity, in furtherance of a drug trafficking and money laundering conspiracy, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and violations of Title 18, United States Code, Section 1956(h).

MONEY LAUNDERING CONSPIRACY:

On February 11, 2004, Darrell Thomas Jones introduced the UCE to Ron Middlebrook, owner of Ron's Body Shop, located in Cookeville, Tennessee. Middlebrook invited the UCE to participate in the acquisition of a racetrack, and advised that the race business was ideal for laundering cash. Middlebrook offered the assistance of his sister, Robin Blaskis, a Certified Public Accountant (CPA) who, according to Middlebrook, was experienced in laundering money and hiding income.

On March 2, and March 3, 2004, the UCE met with Middlebrook and discussed the scheme to launder purported illegal proceeds. Middlebrook advised he would launder the money through his race track, Tennessee Motor Speedway, or re-open his salvage yard and launder the money through the salvage business. Middlebrook agreed to launder the cash for a fee of six percent with \$25,000 in up-front fees. The UCE and Middlebrook also discussed the mechanics of moving cash from Florida to Cookeville so it could be laundered.

On March 5, March 6, and March 7, 2004, the UCE met with police officer Reno Martin in Fort Lauderdale, Florida, to arrange for the transportation of \$250,000 of purported illegal proceeds from Florida to Nashville. March 6, 2004, Martin agreed to transport \$250,000 cash for which Martin would be paid 2% or \$5,000. Martin was advised that the cash to be transported was vacuum sealed, locked in a case and concealed in the load vehicle. Martin had Darrell Thomas Jones transport Martin's Glock .45 caliber semiautomatic handgun to Florida, so that Martin could have the firearm with him, while transporting the U.S. Currency on his return trip to Tennessee.

On March 7, 2004, FBI Agents surveilled Martin as he transported the \$250,000 to Nashville, Tennessee. The transport vehicle was, thereafter, received by the UCE and Martin was paid for his services. In future meetings held on April 3, & April 26, 2004, Martin asked to drive a load of drugs for the UCE in order to make more money.

On April 2, 2004, the UCE met with Ron Middlebrook at the Tennessee Motor Speedway (TMS) in Baxter, Tennessee. The UCE provided Middlebrook a check in the amount of \$25,000 referred to as a "sponsorship" but understood to be advance payment of money laundering fees. Middlebrook agreed to launder money at a rate of six percent.

On April 3, 2004, the UCE delivered \$50,000 in cash of purported illegal proceeds to Ronald Middlebrook. The cash was contained in a briefcase and was previously transported from Nashville to Baxter by police officer Reno Martin. Martin told the UCE that he was interested in transporting drugs, needed to make some money to make his life a "little bit more comfortable" and also talked to the UCE about how law enforcement officers are trained to spot drug couriers. Martin acknowledged that the cash being transported was to be laundered through Tennessee Motor Speedway.

On April 26, 2004, Middlebrook explained how to falsify Tennessee Motor Speedway financial records to explain the money he was laundering for the UCE. Middlebrook and the UCE then met with CPA Robin Blaskis at her office. During his meeting they discussed the ground work for a conspiracy to launder one million dollars through various accounts controlled by Middlebrook and Blaskis. Blaskis advised Middlebrook and the UCE regarding their money laundering scheme, pointing out the tax implications of various transactions. Blaskis computed that the \$25,000 in advance fees paid to Middlebrook would launder \$416,000 at a six percent rate. Blaskis advised that laundering was easier when done through accounts with large amounts of cash already flowing through them, asked how much the UCE needed to launder (about a million a year) and pointed out that her business did about five million dollars cash flow a year. She also offered to let Middlebrook run some of the money through an escrow account and explained to the UCE that it would "just filter through that and you would get a 1099" Thereafter, the UCE gave Middlebrook \$50,000 cash to be laundered.

In 2004, Middlebrook and Blaskis accepted purported illegal proceeds, in Putnam County, Tennessee, from what they believed to be drug trafficking organization, totaling \$650,000 cash. The cash was delivered, in varying amounts, to Middlebrook or Blaskis, on the following dates:

1. April 3, 2004, \$50,000
2. April 26, 2004, \$50,000
3. May 24, 2004, \$100,000
4. June 16, 2004, \$50,000
5. July 28, 2004, \$100,000
6. September 1, 2004, \$100,000
7. October 14, 2004, \$150,000
8. November 23, 2004, \$50,000

The entire \$650,000, of purported illegal proceeds was laundered through various accounts controlled by Middlebrook and Blaskis including Tennessee Motor Speedway, Ron's Body Shop, RRA Brokers, Escrow Services, Tommy's Auto Salvage, and Cumberland Cultured Inc. Middlebrook and Blaskis, believing the FBI undercover operation was a drug trafficking organization, returned the laundered \$650,000, minus a six percent service fee that they retained.

As described above, The FBI, through the UCE, provided the \$650,000, in varying amounts in cash. Middlebrook and Blaskis would thereafter provide the UCE with checks or wire transfers drawn on accounts from banking/financial institutions on the above business accounts held by Middlebrook and Blaskis.

Regarding the above deliveries, Police Officer Reno Martin transported the cash from Nashville to Putnam County, Tennessee, on April 3, April 26, June 16, July 28, and September 1, 2004. Thereafter, the money was delivered by the UCE to Ronald Middlebrook or Robin Blaskis, Reno Martin expressed to the UCE that he knew the money was going to the Speedway.

On or about April 19, 2004, in a telephone conversation with the UCE, Reno Martin told the UCE that he needed a "big load" to relieve some "financial strain." Reno explained that his wife had planned a family vacation to Cancun. On April 26, 2004, Reno Martin requested the opportunity for a job transporting narcotics. Martin told the UCE that the money he makes hauling cash to Baxter is used to make his truck payments and the money he made hauling cash from Florida paid for landscaping his house but he needs to make about \$35,000 to make it worth the risk.

On June 16, 2004, the UCE traveled to Ron's Body Shop with the \$50,000 cash concealed in a hidden compartment in a Dodge Intrepid load car. This is the same load car subsequently driven by Reno Martin from Nashville to Chicago with 30 kilograms of purported cocaine. Ron Middlebrook inspected the load car, replaced some missing upholstery plugs in the trunk and replaced some light bulbs. The \$50,000 cash was retrieved from the hidden compartment. Ronald Middlebrook made it clear that he knew what the compartment was for and remarked that he noticed it immediately while examining the trunk. Middlebrook recommended using spot welds instead of pop rivets in the trunk because pop rivets would attract attention.

On June 24 and 25, 2004, The UCE met with Middlebrook and Blaskis in Ft. Lauderdale, Florida, to discuss their money laundering scheme. The UCE introduced Blaskis to his purported criminal associates and further discussed the criminal source of the cash that Middlebrook and Blaskis were laundering. Middlebrook continued to identify potential corrupt law enforcement officers. Blaskis agreed to launder additional illegal proceeds. On July 1, 2004, Blaskis advised that she and Middlebrook had discussed it and agreed they could launder between \$50,000 and \$75,000 per week for the next year. On July 28, 2004, during a meeting with the UCE, Blaskis advised that she and Middlebrook had established bank accounts in three different banks in order to minimize speculation caused by frequent cash deposits.

On September 1, 2004, Reno Martin asked the UCE about another job hauling narcotics for the UCE. Reno Martin also acknowledged knowing that the cash he has been transporting for the UCE is being laundered through Tennessee Motor Speedway.

On October 14, and October 15, 2004, Ronald Middlebrook and Robin Blaskis advised the UCE that Greg Scott would make a good courier. Between October 21, 2004, and November 28, 2004, Middlebrook and Blaskis advised that Putnam County Sheriff's Department Jailer Greg Scott was willing to transport illegal proceeds for the UCE. On November 8, 2004, Blaskis introduced Putnam County Jailer Greg Scott to the UCE and Blaskis "vouched" for Scott. Scott showed up for the meeting wearing a Putnam County Sheriff's jacket and showed the UCE his drivers license which bears a photo of Scott in a police uniform.

On November 9, 2004, Greg Scott discussed with the UCE, being hired to transport illegal proceeds. Scott told the UCE that Blaskis explained that he needed to deliver some "stuff" for the UCE. The UCE explained that he needed someone with a badge to make sure the police don't seize it and Scott said that would not be a problem. On November 23, 2004, Putnam County Jailer Gregg Scott met the UCE in Nashville, Tennessee, and transported \$50,000 of purported drug proceeds proceeds to Cookeville, Tennessee, where he delivered the cash directly to Robin Blaskis. Scott was paid \$500

for transporting the cash and he discussed traveling to Miami to transport another load and advised as to which car he would drive in order to be less conspicuous.

The money laundering scheme had, as it's purpose, to legitimize cash that was purported to be proceeds from drug trafficking. In that respect, and based on conversations between the UCE, Middlebrook and Blaskis, it was understood that in order to use the laundered money, the UCE needed to be able to show through 1099 tax forms the cash came from legitimate sources.

In that regard, on March 2, 2005, FBI Chicago received an envelope from Blaskis addressed to R&S Productions which contained a 1099 tax form "Miscellaneous Income" for tax year 2004 documenting non-employee compensation in the amount of \$350,000 paid by A-1 Auto Parts and Sales to R&S Productions. On March 3, 2005, FBI Chicago received an envelope from Blaskis addressed to R&S Productions which contained two 1099 forms "Miscellaneous Income" for tax year 2004. Both of the forms identified the recipient as R&S Productions. One of the forms identified the payer as CCI Industries and the amount paid as \$141,000 and the other form identified the payer as RRA Brokers and the amount paid as \$188,000.

On April 13, 2005, Ronald Middlebrook coordinated a trip to Florida with police officer Steven Williamson in order for Williamson to transport money purported to be illegal proceeds, from Florida to Tennessee, the week of April 25, 2005. On April 26, 2005, the UCE met with Middlebrook, Williamson, and Troy Bell in Fort Lauderdale, Florida, to arrange the transportation of purported illegal proceeds from Ft. Lauderdale to Nashville. Middlebrook discussed how the transportation fee would be split. Williamson and the UCE discussed the load of cash and Williamson assured the UCE that the police would not be a problem.

On April 27, 2005, the UCE met with Middlebrook in Fort Lauderdale, Florida and paid Middlebrook \$2,000 cash for arranging the transportation of illegal proceeds. The UCE handed Williamson two bundles of cash, each containing \$500, and explained that one bundle was for Bell. Williamson took possession of a brief case containing purported illegal proceeds and he and Bell departed Ft. Lauderdale in Williamson's car en route to Nashville.

Later that afternoon, Middlebrook and the UCE flew from Fort Lauderdale to Nashville, Tennessee. Middlebrook also made it clear that he expects the lion's share of the transportation fee for the first load of cocaine Williamson hauls for the UCE. That evening, Williamson and Bell delivered the brief case of illegal proceeds to the UCE in Nashville, and were paid \$1,000 each.

#### DRUG TRAFFICKING CONSPIRACY:

The undercover operation, included a scheme whereby, it was believed that the UCE's drug trafficking organization transported cocaine through vehicles within the United States. For these purposes Darrell Thomas Jones and Ronald Middlebrook, assisted by either transporting or recruiting police officers who subsequently engaged in the transport of vehicles from state to state, believed to contain multi-kilogram quantities of cocaine. These subjects also equipped and inspected

vehicles with hidden compartments designed to conceal cocaine or illegal cash.

On May 29, 2003, Darrell Thomas Jones met with the UCE and indicated he was interested in fabricating compartments in transport vehicles, designed to conceal cocaine and money, for the UCE's criminal associates in Miami. On July 24, 2003, Jones received a vehicle so that a concealed compartment could be fabricated in the vehicle capable of concealing 15 to 20 kilograms. Jones restated his interest in obtaining cocaine and advised that he had an established buyer in place. On September 11, 2003, Jones provided to the UCE, the vehicle which Jones caused to be to conceal multiple kilograms of cocaine. Jones and the UCE discussed hiring police officer Reno Martin or other law enforcement officers to transport loads of cocaine.

On November 19, 2003, Jones himself transported five kilograms of purported cocaine from a truck stop in Knoxville, Tennessee, to a service station in Lebanon, Tennessee. Jones was paid \$1,500 in exchange for this transport.

On June 16, 2004, Ronald Middlebrook inspected a transport vehicle equipped with a hydraulic hidden compartment and discussed it's effectiveness as a transport vehicle.

On July 2, 2004, police officer Reno Martin transported thirty (30) kilograms of purported cocaine from the Nashville Airport to Chicago, Illinois, where he delivered the purported cocaine to the UCE for an agreed total payment of \$15,000. In Chicago, Martin watched as the kilogram packages were removed from a hidden compartment in the load car (the same car inspected by Middlebrook on June 16, 2004). Reno Martin offered advice on avoiding police detection regarding transport vehicles and also warned the UCE that Tom Jones' phone may be tapped.

On September 1, 2004, police officer Reno Martin offered to sell to the UCE a list of what he represented to be targets of a wire tap law enforcement investigation. He advised the UCE that he was assigned to work on an investigation involving a wire tap that targeted individuals in Chicago and Miami. Martin believed that the UCE was part of a drug trafficking organization based out of Chicago, with connections in Miami. Martin eventually provided the list of names in exchange for \$2,000.

On or about October 14, 2004 Martin requested a \$30,000 advance payment against future cocaine deliveries.

On May 17, 2005, Steven Williamson advised the UCE that he was willing to transport drugs and had gone so far as to research the vehicle search laws in preparation. He stated that Troy Bell would participate in transporting dope by acting as a "front runner" in a rental car. Based on my training and experience, I know that it is a common technique, in the transportation of vehicles with hidden contraband, to travel with a second lead vehicle that attempts to detect law enforcement vehicles or act as a decoy.

On June 2, 2005, Steve Williamson and Troy Bell took possession of what they believed to be 20 kilograms of cocaine from the trunk of a car parked at the Nashville airport. Williamson and Bell

delivered the 20 kilograms of purported cocaine to undercover FBI Agents in Chicago, Illinois, whom they believed were part of a drug trafficking organization. Agents in Chicago received the purported cocaine and paid Williamson \$6,000 cash. After delivering the purported cocaine, Williamson telephoned the UCE and asked for assistance in purchasing a new Honda SUV particularly suited for transporting drugs.

# United States District Court

MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

JASON BLYTHE

CASE NUMBER: 05-3083MB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 1, 2005 in Putnam county, in the Middle District of Tennessee defendant(s), (Track Statutory Language of Offense)

not being a licensed importer, manufacturer, dealer, <sup>or</sup> and collector of firearms, willfully transferred, sold, traded, gave, transported, or delivered, a firearm, to wit: a Smith and Wesson, Model 36, 38 Special revolver, serial no. 581J23/99914, and a Smith and Wesson, Model 66-1, 357 Magnum Revolver, serial no. 39K1787, to individual, said person not being a licensed importer, manufacturer, dealer, <sup>or</sup> and collector of firearms, and the defendant had reasonable cause to believe that said person resided in the State of Illinois, a State other than that in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery, of the firearm,

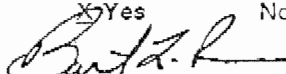
in violation of Title 18 United States Code, Section(s) 922(a)(5) and 924(a)(1)(D).

I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof:

Yes  No


  
Bart L. Brown  
Signature of Complainant

Sworn to me and subscribed in my presence,

Aug 16  
January 3, 2005  
Date

at Nashville, Tennessee  
City and State

JOE B. BROWN  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

## Statement in Support of Criminal Complaint

### INTRODUCTION

I, Bart L. Brown, being duly sworn, do hereby depose and state:

I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the Cookeville Resident Agency. I have been employed by the FBI for the last ten years. During this time I have been assigned to investigate, among other criminal matters, drug trafficking, money laundering, firearms violations, public corruption, and organized crime. I make this statement based upon personal knowledge derived from my participation in this investigation as well as information provided to me by other law enforcement officers. Where conversations are related herein, they are related in substance and in part. Furthermore, this statement does not contain all of the information known to me regarding this investigation, but only what is sufficient to establish probable cause in support of a criminal complaint.

I submit this affidavit for the arrest of Jason Blythe, for the charge of, not being a licensed importer, manufacturer, dealer, ~~and~~ collector of firearms, willfully transferred, sold, traded, gave, transported, or delivered, a firearm, to wit: a Smith and Wesson, Model 36, 38 Special revolver, serial no. 581J23/99914, and a Smith and Wesson, Model 66-1, 357 Magnum Revolver, serial no. 39K1787, to individual, said person not being a licensed importer, manufacturer, dealer, ~~and~~ collector of firearms, and the defendant had reasonable cause to believe that said person resided in the State of Illinois, a State other than that in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery, of the firearm, in violation of Title 18 United States Code, Section(s) 922(a)(5) and 924(a)(1)(D).

In that regard, On February 1, 2005, in a Putnam County hotel room, Jason Blythe met with an FBI undercover Agent (UCE) for the purpose of selling to this agent two fire arms, more specifically described as a Smith and Wesson, Model 36, 38 Special revolver, serial no. 581J23/99914, and a Smith and Wesson, Model 66-1, 357 Magnum Revolver, serial no. 39K1787. Blythe did in fact sell these firearms to the UCE, believing that the UCE resided in Illinois.

On previous occasions and during previous conversations with the UCE, Blythe learned that the UCE was from Illinois. Upon request by the UCE, Jason Blythe faxed a list of firearms to the UCE's purported place of business in Illinois.

In September of 2004, during a conversation with the UCE, Blythe acknowledged that the UCE was from Illinois. Also, on February, 1, 2005, the date that Blythe sold the above two firearms to the UCE, Blythe was informed by the UCE that the UCE would be shipping the firearms back home in a cooler via federal express because he could not carry the firearms on an airplane.