

United States District Court

NORTHERN DISTRICT OF

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Terry Kemone Anderson  
Charlie Lee Hill  
Standric Choice

CASE NUMBER: 3:09-MJ-08

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 9, 2009 in Dallas County, in the Northern District of Texas defendant(s) did,

knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, and knowingly and intentionally combined, conspired, confederated and agreed with each other and other persons known and unknown to commit the following offense against the United States, to wit: to possess with the intent to distribute in excess of five hundred grams of a substance or mixture containing a detectable amount of cocaine, a Schedule II controlled substance

in violation of Title 21, United States Code, Section(s) 846, 841(a)(1) and (b)(1)(B).

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

See attached Affidavit of Special Agent Richard Burkhead, FBI, which is incorporated and made a part hereof by reference.

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

Signature of Complainant  
Richard Burkhead  
FBI,

Sworn to before me and subscribed in my presence, on this 9 day of January 2009, at Dallas, Texas.

PAUL D. STICKNEY  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

I, Special Agent D. Richard Burkhead, Jr. being duly sworn hereby depose and say:

I have been employed as a Special Agent with the Federal Bureau of Investigations (FBI) for approximately twelve years. As a Special Agent my duties include but are not limited to conducting criminal investigations concerning violations of Federal Laws including bribery, mail fraud, and wire fraud. This affidavit is presented for the limited purpose of securing a federal arrest warrant via criminal complaint for Terry Kemone Anderson, black male, date of birth xx/xx/1979; Charlie Lee Hill, black male, date of birth xx/xx/1977; and Dallas Sheriff's Deputy (DSO) Standric Choice, black male, date of birth xx/xx/1972, for possession with intent to distribute in excess of five-hundred grams of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§841(a)(1) and (b)(1)(B); and conspiracy to possess with the intent to distribute in excess of five-hundred grams of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§846 and 841(a)(1) and (b)(1)(B). As shown below, Terry Kemone Anderson, Charlie Lee Hill, and Standric Choice, committed these offenses on or about January 09, 2009 in Dallas County, Texas which is in the Dallas Division of the Northern District of Texas.

As a result of my personal participation in the investigation of matters referred to in this affidavit and discussions with other agents participating in the

investigation, I am familiar with the facts and circumstances of this investigation, which follow:

On January 7, 2009, Agents of the IRS HIDTA group received information from a reliable Confidential Informant (CI) that a Dallas County Sheriff's Officer (subsequently identified as Standric Choice) was involved in a conspiracy with an individual believed to be his brother-in-law (subsequently identified as Charles Lee Hill, but the investigation has not determined any family connection), to distribute narcotics. A meeting was held with the CI in which the CI described a narcotic transaction he referred to as "trading licks" (stealing the narcotics from the drug supplier). After meeting with the CI, Agents advised the CI to set up a meeting with Hill and the DSO deputy to finalize plans for a drug deal.

On January 8, 2009, the CI met with Hill and finalized the details of the proposed drug deal. During this meeting, the CI told Hill he was a narcotics distributor. They developed a plan where the CI and his cocaine source were to meet at the TA Truck Stop located at Interstate 20 and Bonnie View Lane in Dallas, Texas to complete a 4 kilo cocaine transaction. (Unbeknowst to Hill, an undercover agent would pose as the drug supplier.) Hill agreed that after he saw the CI and his supplier (the UCA) meet, he would call DSO Deputy Choice. They planned that Choice would pull into the parking lot to investigate the car, and that upon finding the 4 kilos of cocaine, Choice would arrest the CI and release the UCA. Choice would then take the 4 kilos and the CI to a second predetermined

location where Hill would be waiting and release the CI. The CI would meet with Hill and the two (the CI and Hill) would split the drugs stolen from the drug supplier (UCA.). Investigator Schutt of the Irving Police Department provided the 4 kilos of cocaine used in the drug deal and which had been previously chemically tested as cocaine.

On January 9, 2009, at approximately 10:45 a.m. surveillance was initiated at 3900 Investor, Apartment #1438, Dallas, Texas by the Irving Police Department. During the surveillance, two unknown black males, later identified as Charlie Lee Hill and Terry Kemone Anderson, were seen exiting the apartment and entering a gray Nissan Pathfinder, California license plate number 5ZBV753. Irving Police then followed the vehicle to the TA Truck Stop/Burger King, 7751 Bonnie View Road, Dallas, Texas, where physical and video surveillance had been pre-positioned and initiated by Agents of the FBI, IRS South HITDA group, Irving Police Officers, and Desoto SWAT team members. The UCA and CI were also pre-positioned in a known vehicle at the TA Truck Stop/Burger King, 7751 Bonnie View Road, Dallas, Texas.

At approximately 12:00 p.m., a single DSO marked squad car, identification number SE 419 pulled into TA Truck Stop/Burger King, 7751 Bonnie View Road, Dallas, Texas and pulled in behind the UCA and CI's vehicle and turned on the overhead emergency lights. Deputy Choice exited the squad car approached the CI and UCA. Choice asked the UCA a few questions and then told the UCA to


leave. Choice then placed the CI into custody. After securing the CI in the backseat, Choice retrieved a duffle bag containing 4 kilos of cocaine from the known vehicle and placed it into the trunk of his squad car.

After securing the CI and cocaine in the squad car, Choice exited the TA Truck Stop and drove southbound on Bonnie View Road. Through surveillance, the previously identified gray Nissan Pathfinder and DSO squad car were seen together in a deserted area on Cleveland Road located just west of Bonnie View Road. The identified DSO squad vehicle and Nissan Pathfinder were then observed traveling northbound on Bonnie View Road. The DSO vehicle was then followed until it eventually arrived at the Dallas Sheriff's Department, 133 North Industrial, Dallas, Texas. Choice was then taken into custody and subsequently admitted to his participation in this "trading licks" scheme.

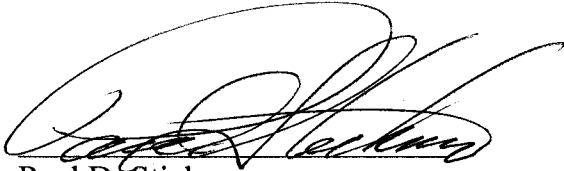
The Nissan pathfinder was observed re-entering the TA Truck Stop where the vehicle stopped briefly, and the CI exited the vehicle. Two kilos of cocaine were then retrieved from the CI. The Nissan Pathfinder left the TA Truck Stop and traveled northbound on Bonnie View Road where Desoto tactical operators conducted a felony car stop. Subsequent to the car stop, Hill and Anderson were arrested. Two kilos of cocaine were retrieved by the Irving Police Department from the front passenger seat floor board. Hill and Anderson subsequently admitted to their participation in this "trading licks" scheme.

Conclusion

Based on the aforementioned, Affiant believes there is probable cause to charge Terry Kemone Anderson, black male, date of birth, xx/xx/1979; Charlie Lee Hill, black male, date of birth, xx/xx/1977; and Dallas Sheriff's Deputy (DSO) Standric Choice, black male, date of birth, xx/xx/1972 for possession with intent to distribute a controlled substance in violation of 21 U.S.C. §§841(a)(1) and (b)(1)(B); and conspiracy to possess with the intent to distribute in excess of five-hundred grams of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§846 and 841(a)(1) and (b)(1)(B).

  
D. Richard Burkhead, Jr.  
Special Agent, FBI

8:30 Subscribed to and sworn before me, this the 9th day of January, 2009 at  
p.m.

  
Paul D. Stickney  
United States Magistrate Judge  
Northern District of Texas