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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Richard Barnes aka "Richie"

D-2 Kady Cope

D-3 Kimberly Gordon aka "Kim"

D-4 Donald Morell aka "DJ"

D-5 Jezrell Grinnell aka "Jazzy"

D-6 Eric Radatz

D-7 Falen Radatz

Case:2:17-mj-30027  
Judge: Unassigned,  
Filed: 01-23-2017 At 02:13 PM  
SEALED MATTER (LH)

## 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 2012- 2016 in the county of Macomb and elsewhere in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

21 U.S.C. §§ 841 and 846

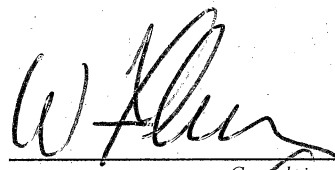
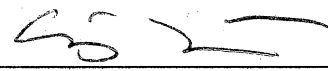
*Offense Description*

Conspiracy to manufacture and distribute meth

This criminal complaint is based on these facts:  
see attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: JAN 23 2017City and state: Detroit, MI  
Complainant's signatureS/A William Fleming, FBI  
Printed name and title  
Judge's signatureAnthony Patti, United States Magistrate Judge  
Printed name and title

**Affidavit**

I, William R. Fleming, Special Agent of the Federal Bureau of Investigation (FBI), currently assigned to the Detroit Division, Macomb County Resident Agency, Clinton Township, Michigan, being duly sworn, depose and state as follows:

- 1) I have been employed as a Special Agent of the FBI for over twenty-nine years. During this time, I have worked numerous investigations involving the manufacturing and distribution of methamphetamine (hereafter, meth).
- 2) The following is based upon my personal investigation, as well as the receipt of information from other Federal, State, and Local law enforcement personnel. I have not set forth all of the information known to me or known to other members of law enforcement. I have included only the information necessary to establish probable cause.
- 3) In early 2005, the FBI, Detroit Division, began to receive information on the organized criminal activities being conducted by an outlaw motorcycle gang called the Devil's Diciples (sic).
- 4) During the course of this investigation it has been determined that members and associates of the Devil's Diciples Motorcycle Gang (DDMG) are heavily involved in the manufacture, distribution, and use of meth. The basis for this determination includes, but is not limited to, court authorized Title III interceptions of DDMG members and associates, the execution of search warrants, interview/proffers of DDMG members/associates, information provided by cooperating witnesses and confidential sources, and grand jury testimony by DDMG members/associates.
- 5) In June of 2012, a federal grand jury sitting in the Eastern District of Michigan, Southern Division, returned a thirty-eight count indictment against members

and associates of the DDMG. In addition to RICO conspiracy charges (which contained numerous meth related overt acts), numerous members and associates were charged with meth related federal crimes, to include manufacturing, distributing and possessing meth, possession with intent to deliver meth, possession of meth precursors, and manufacturing meth where children reside or are present.

- 6) Based, in part, upon these indictments and additional investigation, indicted members and associates, as well as previously unknown or undiscovered witnesses have begun to cooperate with law enforcement and identify other DDMG members and associates who are involved in meth related crimes.
- 7) This information has led to additional arrests and search warrants related to the manufacturing and distribution of meth, both related to the DDMG and independent of the DDMG.
- 8) To date, this new information has resulted in the arrest and federal prosecution of ROGER AUSTIN, aka DOC (member of the DDMG), JEFFREY MILLER, aka JUNIOR (former member of the VIGILANTE MOTORCYCLE GANG, VMG), AMANDA MITCHELL, SCOTT MCGINNIS, BRADLEY TYRELL (member of the DDMG), WILLIAM CORNACCHIA, aka BILLY, AMBER SIX, JESSE DUNCAN, aka SIDESHOW (former member of the DDMG), and STEVEN MONZO.
- 9) Recent information and investigation has identified, RICHARD BARNES, aka RICHIE, KADY COPE, KIMBERLY GORDON, aka KIM, ERIK RADATZ, FALEN RADATZ, DONALD MORELL, aka DJ, and JEZREEL GRINNELL, aka JAZZY as being involved, with some of the parties listed in paragraph 8, in the manufacture and distribution of meth.

#### **GENERAL INFORMATION**

- 10) Affiant is aware, through training, experience, and investigation in this matter that pseudoephedrine is one of the main ingredients necessary to manufacture ("cook") meth using the "shake and bake" method. The

primary way that meth manufacturers obtain the pseudoephedrine is through the purchase of cold medications that contain pseudoephedrine.

- 11) In March of 2006, the Combat Methamphetamine Epidemic Act of 2005 (CMEA) was signed into law and is intended to regulate the over the counter sale of products that contained pseudoephedrine (primarily cold medications). A portion of the CMEA places daily limits on the amount of pseudoephedrine cold medication (PCM) a person can buy, placed a similar limit on the amount a person could buy during a thirty-day period, and placed regulations on stores selling these products that required, among other things, maintaining a sales logbook, and recording the identification used by people to purchase these products.
- 12) Prior to January of 2012, the State of Michigan did not maintain a central electronic database to track and monitor sales of pseudoephedrine throughout the state of Michigan. Each store was left to determine its own method of recording and maintaining this information.
- 13) Some larger stores/chains utilize a central electronic database called NPLEX (National Precursors Log Exchange) to track and monitor these sales. In January of 2012, the state of Michigan mandated that all stores use the NPLEX system.
- 14) Law enforcement personnel can query the NPLEX database to determine how many purchases of PCM a particular person has made during a particular time period. In addition, NPLEX can conduct a "proximity search" which will identify people who have purchased PCM in close proximity to each other (either by location or time).
- 15) Affiant is aware, through training, experience, and investigation in this matter, that meth cooks will recruit people to purchase PCM in an attempt to mask their involvement in this activity and in an attempt to circumvent

the provisions of the CMEA and obtain larger amounts of PCM then is allowed.

- 16) Furthermore, meth cooks will send multiple people to purchase PCM, from the same location at approximately the same time, to obtain a larger quantity of PCM and to obtain the PCM more quickly.

### **BACKGROUND INVESTIGATION**

- 17) In September of 2016 the FBI arrested WILLIAM CORNACCHIA, aka BILLY and AMBER SIX for manufacturing and distributing meth in violation of federal law. A federal search warrant was executed, at the home they shared, in Port Huron, Michigan. This search recovered meth lab remnants, meth precursors, meth, four firearms, a large amount of ammunition, and approximately \$3,200 in cash.
- 18) During a Miranda interview of CORNACCHIA, CORNACCHIA admitted manufacturing and distributing meth. In relationship to this specific criminal complaint, CORNACCHIA reluctantly advised that ERIK and FALEN RADATZ were two of his regular meth customers. In addition, CORNACCHIA admitted that he made meth at the home of KADY LNU, who lived on Cribbins Road.
- 19) CORNACCHIA advised that STEVEN MONZO was also making and selling meth. According to CORNACCHIA, he actually learned how to make meth by watching MONZO.
- 20) CORNACCHIA admitted to using the garage at his home to make meth on numerous occasions.
- 21) In October of 2016 the FBI arrested STEVEN MONZO. MONZO was wanted by both the FBI and the St. Clair County Sheriff's Office on meth

related charges. MONZO was located in a hotel room with KIMBERLY GORDON in Port Huron, Michigan.

- 22) A consent search of the hotel room located meth, drug paraphernalia, and approximately \$920 in cash. GORDON admitted that the meth located in the hotel room belonged to MONZO.

**RICHARD BARNES, aka RICHIE**

- 23) Investigation has determined that at various points in time, BARNES has lived with CORNACCHIA or MONZO. During a period in 2013-2014 when MONZO moved to Virginia, BARNES also went to Virginia.

- 24) A Cooperating Witness (hereafter CW1) advised that BARNES is a meth cook who was taught how to cook meth by MONZO. CW1 has purchased meth from BARNES on at least six occasions and has given PCM to BARNES in exchange for meth.

- 25) Furthermore, CW1 has advised that BARNES has provided PCM to both MONZO and CORNACCHIA for them to make meth with.

- 26) CW1 is providing information to the government under a proffer agreement. Information provided by CW1 has been verified in part by database checks, information provided by other parties, and law enforcement actions/activity.

- 27) Another Cooperating Witness (hereafter CW2) advised that BARNES provided PCM to MONZO so that MONZO could make meth.

- 28) CW2 is providing information to the government under a proffer agreement. Information provided by CW2 has been verified in part by database checks, information provided by other parties, and law enforcement actions/activity.

- 29) Two additional witnesses, interviewed separately, have also told the FBI that BARNES purchased PCM for MONZO to make meth with.
- 30) During an interview of DONALD MORELL, MORELL advised that he was present, in October of 2016, when BARNES and MONZO cooked meth together, in MORELL'S barn.
- 31) Investigation has determined that MONZO moved to Virginia, sometime in 2013 and returned sometime in 2015. Witnesses have told the FBI that MONZO continued to make meth while living in Virginia. At some point, while MONZO was living in Virginia, BARNES also moved to Virginia with MONZO.
- 32) A review of NPLEX for BARNES revealed that BARNES has purchased PCM on approximately 141 occasions between April of 2012 and December of 2016. In addition, BARNES has been blocked, by the provisions of the CMEA, from purchasing PCM on 9 occasions during this same time period.
- 33) BARNES has purchased a total of approximately 318 grams of PCM. The United States Sentencing Guidelines Manual, Section 2D1.11(d)(4) states that the base offense level for an offense involving between 300 grams and 1 kilogram of pseudoephedrine is a level 32.
- 34) Even after the arrests and searches, involving MONZO and CORNACCHIA, BARNES continued to purchase PCM. BARNES last purchased PCM on December 22, 2016.
- 35) In addition, NPLEX records revealed numerous occasions when BARNES purchased PCM, on the same date, at approximately the same time, and at the same location as MONZO and other subjects involved in this investigation.

- 36) For example, on May 18, 2013, BARNES purchased PCM at 3:13pm from the Walgreens, 1617 10<sup>th</sup> Street, Port Huron, Michigan. MONZO purchased PCM from this same location at 3:09pm, 4 minutes before BARNES.
- 37) BARNES also purchased PCM on the same date, location, and within a few minutes of MONZO on July 30, 2013, November 8, 2014 (at a location in Virginia), and August 7, 2016.
- 38) Furthermore, BARNES purchased PCM on the same date, same location, and with a few minutes of SIX on June 19, 2014, CORNACCHIA on July 4, 2014, COPE on October 4, 2014, and December 4, 2015.

**KADY COPE**

- 39) Investigation has determined that KADY COPE lives on Cribbins Road in Avoca, Michigan. As mentioned in paragraph 18, CORNACCHIA made meth at the home of a KADY LNU who lived on Cribbins Road.
- 40) CW1 advised that COPE regularly provided PCM to CORNACCHIA in exchange for meth. CW1 was also aware that COPE had allowed CORNACCHIA to make meth at the home COPE shares with her mother.
- 41) CW2 advised that COPE has allowed both CORNACCHIA and MONZO, separately, to cook meth at the house she shares with her mother.
- 42) During the execution of the arrest warrants and search warrant at the home of CORNACCHIA and SIX in September of 2016, COPE was located inside the search/arrest location.
- 43) A voluntary interview of COPE was conducted and COPE admitted that she uses meth several times a month. In addition COPE stated that she was aware that CORNACCHIA was making and selling meth.



- 44) COPE denied ever seeing CORNACCHIA cook meth and denied knowing where CORNACCHIA made meth at, even though COPE admitted staying at SIX and CORNACCHIA'S house a couple of times a month.
- 45) COPE did admit that she had purchased PCM, for CORNACCHIA, on numerous occasions, starting in 2013. COPE was aware that the PCM she purchased was used to make meth. COPE explained that CORNACCHIA told her what type of PCM to buy, CORNACCHIA would give her the money to purchase the PCM, and often times CORNACCHIA would drive COPE to the pharmacy.
- 46) A review of NPLEX for COPE revealed that COPE has purchased PCM on approximately 83 occasions between April of 2013 and September of 2016. COPE has been blocked on 2 occasions.
- 47) COPE has purchased a total of approximately 178 grams of PCM. The United States Sentencing Guidelines Manual, Section 2D1.11(d)(4) states that the base offense level for an offense involving at least 100 grams and less than 300 grams of pseudoephedrine is a level 30.
- 48) In addition, NPLEX records revealed numerous occasions when COPE purchased PCM on the same date, at the same location, and within several minutes of other subjects in this investigation.
- 49) For example, on April 3, 2015, COPE purchased PCM from the Walgreens, 31100 Groesbeck, Fraser, Michigan at 8:33am and 8:42am. CORNACCHIA purchased PCM from this same location at 8:43am.
- 50) COPE purchased PCM on the same date, at the same location, and within a few minutes of MONZO on July 30, 2013, October 10, 2013, and November 10, 2013, BARNES on August 14, 2013, September 5, 2014, and October 5, 2014, CORNACCHIA on October 30, 2013, April 4, 2014, April 24,

2014, October 20, 2014, and April 3, 2015, and finally SIX on August 15, 2014, September 15, 2014, November 16, 2014, and November 21, 2014.

**KIMBERLY GORDON, aka KIM**

- 51) Investigation has determined that GORDON and MONZO were involved in an on/off relationship, mostly centered on GORDON'S ability to get meth from MONZO.
- 52) GORDON has an extensive criminal history, which includes convictions for, delivery/manufacturing of a controlled substance, possession of meth, assault on a police officer, unlawful driving away of a motor vehicle, retail fraud, assault with intent to rob, larceny from a person, and OUIL.
- 53) On the day that MONZO was arrested, GORDON had two outstanding warrants, one for shoplifting and one for retail fraud.
- 54) As stated in paragraph 22, when MONZO and GORDON were arrested meth and approximately \$920 in cash were recovered in the hotel room.
- 55) Both CW1 and CW2 advised that GORDON would purchase PCM for MONZO to make meth with.
- 56) A witness interviewed by the FBI advised that it was well known in the Port Huron area that GORDON and MONZO were cooking meth together.
- 57) Pursuant to the arrest of GORDON and MONZO, a Miranda interview was conducted with GORDON who admitted that she is a regular user of both heroin and meth. GORDON, who was extremely fearful of MONZO,

reluctantly admitted that the meth located in their motel room belonged to MONZO. GORDON refused to talk about MONZO and meth production.

- 58) A review of NPLEX for GORDON revealed that between December of 2012 and December of 2014 GORDON purchased PCM on 23 occasions and was blocked 3 times.
- 59) GORDON has purchased a total of approximately 51 grams of PCM. The United States Sentencing Guidelines Manual, Section 2D1.11(d)(4) states that the base offense level for an offense involving at least 40 grams but less than 70 grams off pseudoephedrine is a level 26.

**DONALD MORELL, aka DJ**

- 60) While attempting to locate and arrest MONZO (late October of 2016), investigation led the FBI to the home of MELISSA GOODMAN and DONALD MORELL (XXXX Leland, Kimball Township, Michigan). GOODMAN was interviewed and she was evasive concerning her knowledge of MONZO and his connection to MORELL.
- 61) GOODMAN did admit that MONZO would occasionally stay in their barn. GOODMAN had seen MONZO and a guy named RICH entering their barn the day before she was interviewed by the FBI.
- 62) Shortly after leaving this location, the FBI made telephone contact with MORELL. MORELL, who acknowledged that he currently had two outstanding arrest warrants, advised that he regularly purchased meth from MONZO.
- 63) MORELL admitted allowing MONZO to cook meth, once or twice, inside the barn on MORELL's property that he shares with MELISSA GOODMAN.

- 64) MORELL stated that earlier in the day, he had observed BARNES and MONZO cooking meth in MORELL'S barn.
- 65) Both MORELL and GOODMAN admitted that MORELL goes by the name "DJ".
- 66) CW2 advised that MORELL was buying meth from MONZO and supplying MONZO with PCM so that MONZO could make meth.
- 67) A witness in this case advised that a guy named DJ, who lived on Leland, purchased PCM for MONZO to make meth with.
- 68) A check of NCIC revealed that MORELL is currently wanted for the possession of meth-second offense and failure to pay child support.
- 69) A review of NPLEX records revealed that on July 2, 2013 at 7:32pm, MORELL purchased PCM from the Walgreens, 1617 10<sup>th</sup> Street, Port Huron, Michigan. MONZO purchased PCM from this same location on the same date at 7:33pm.

**JEZREEL GRINNELL, aka JAZZY**

- 70) CW2 advised that GRINNELL, who went by JAZZY, would purchase PCM for MONZO to make meth with. According to CW2, GRINNELL is currently living with GORDON.
- 71) A review of NPLEX revealed that GRINNELL had approximately 55 purchases of PCM between February of 2012 and October of 2016. GRINNELL was blocked a total of nine times during this time period.
- 72) GRINNELL has purchased a total of approximately 125 grams of PCM. As stated earlier the base offense level for an offense involving over 100 grams of pseudoephedrine is a level 30.

- 73) A review of NPLEX records revealed that on August 18, 2016, at 4:31pm, GRINNELL was blocked from purchasing PCM at the Kroger, 1215 24<sup>th</sup> Street, Port Huron, Michigan. At 5:04pm MONZO purchased PCM from this same location.

**ERIK RADATZ and FALEN RADATZ**

- 74) CW1 advised that both ERIK and FALEN RADATZ (husband/wife) purchased PCM for CORNACCHIA to make meth with.
- 75) CW2 stated that both ERIK and FALEN RADATZ bought meth from CORNACCHIA until CORNACCHIA was arrested by the FBI. The RADATZ'S would purchase PCM that they would give to CORNACCHIA to make meth with.
- 76) After CORNACCHIA went to jail, ERIK and FALEN RADATZ began making meth on their own. CW2 stated that the RADATZ'S live on Maple in Kimball Township, Michigan. They use a detached shed like structure on their property to make meth.
- 77) A check of LEIN/SOS records revealed that both ERIK and FALEN RADATZ have a Michigan Driver's License on Maple in Kimball Township, Michigan.
- 78) A witness who was interviewed by the FBI confirmed that both ERIK and FALEN RADATZ purchased PCM that they gave to MONZO to make meth with.
- 79) Even after the arrest and searches involving CORNACCHIA and MONZO, the RADATZ'S continue to purchase PCM on a regular basis. Since MONZO'S arrest on October 20, 2016 each RADATZ, individually, has purchased PCM on six occasions and they both have been blocked once.

The last time that FALEN RADATZ purchased PCM was January 2, 2017 and the last time ERIK RADATZ purchased PCM was December 30, 2016.

80) A review of NPLEX for ERIK RADATZ revealed that between January of 2014 and December of 2016 RADATZ purchased PCM on 87 occasions and was blocked 9 times.

81) *ERIK* RADATZ has purchased a total of approximately 197 grams of PCM. The United States Sentencing Guidelines Manual, Section 2D1.11(d)(4) states that the base offense level for an offense involving at least 100 grams but less than 300 grams of pseudoephedrine is a level 30.

82) A review of NPLEX for FALEN RADATZ revealed that between January of 2014 and January of 2017 RADATZ purchased PCM on 105 occasions and was blocked 25 times.

83) *FALEN* RADATZ has purchased a total of approximately 227 grams of PCM. The United States Sentencing Guidelines Manual, Section 2D1.11(d)(4) states that the base offense level for an offense involving at least 100 grams but less than 300 grams of pseudoephedrine is a level 30.

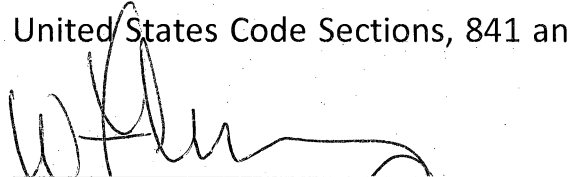
84) In addition, NPLEX revealed approximately 11 occasions when FALEN RADATZ and ERIK RADATZ purchased PCM on the same date, at the same location, and approximate time.

85) A review of NPLEX for FALEN RADATZ showed that April 24, 2016, at 5:38pm RADATZ purchased PCM from the Meijer, 205 S Range Road, Marysville, Michigan. At 5:44pm SIX also purchased PCM from this location.

86) A review of NPLEX for ERIK RADATZ showed that on November 13, 2015 at 4:30pm RADATZ purchased PCM from Meijer, 205 S Range Road,

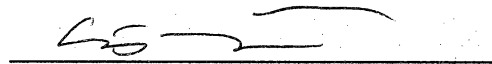
Marysville, Michigan. At 4:28pm COPE also purchased PCM from this location.

87) Based upon the aforementioned information there is probable cause to believe that RICHARD BARNES, aka RICHIE, KADY COPE, KIMBERLY GORDON, aka KIM, ERIK RADATZ, FALEN RADATZ, DONALD MORELL, aka DJ, and JEZREEL GRINNELL, aka JAZZY committed the offense of conspiracy to manufacture and distribute meth in violation of Title 21 United States Code Sections, 841 and 846.

  
\_\_\_\_\_  
William R. Fleming, Special Agent  
Federal Bureau of Investigation

Sworn to and signed before me

this 23<sup>rd</sup> day of January, 2017 JAN 23 2017

  
\_\_\_\_\_

~~Elizabeth Stafford~~

ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

United States Magistrate Judge