

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
TRIAL DIVISION

IN RE
THE THIRTY-FIRST COUNTY
INVESTIGATING GRAND JURY

MISC NO. 0001458-2021

NOTICE C-9

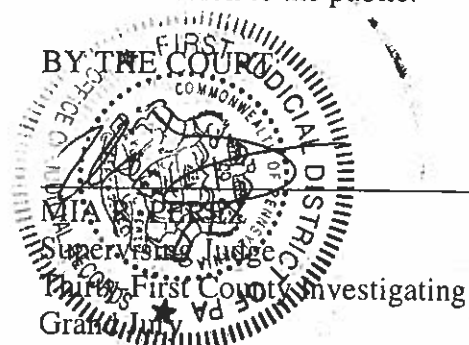
DISCLOSURE ORDER

AND NOW, this 1ST day of NOVEMBER, 2022, the Commonwealth is hereby
ORDERED to file with the Clerk of Courts the following: (A) a confidential version of
Presentment No. 4 of the Thirty-First County Investigating Grand Jury ("Presentment No. 4"),
redacting the signature of the Grand Jury Foreperson and no other information; and (B) a public
version of Presentment No. 4, redacting the signature of the Grand Jury Foreperson and all other
information considered confidential under the Case Records Public Access Policy of the Unified
Judicial System of Pennsylvania.

It is further ORDERED that the confidential version of Presentment No. 4 is hereby
UNSEALED for purposes 42 Pa. C.S. § 4551(b), but that version SHALL continue to be treated
as a confidential document under the Case Records Public Access Policy and SHALL NOT be
publicly disclosed.

It is further ORDERED that the public version of Presentment No. 4 is hereby
UNSEALED, and the Commonwealth is authorized to disclose that version to the public.

FILED BY CENTER for the Judiciary, Inc.
a true and correct copy of the original
as filed in this
office:
Date: 11/2/22
ARP
Active Criminal Records
Criminal Motion Court Clerk
First Judicial District of Pa.



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

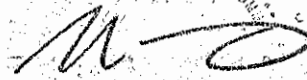
CRIMINAL TRIAL DIVISION

IN RE: :
: Misc. No. 1458-2021
THE THIRTY-FIRST COUNTY :
: Notice C-9
INVESTIGATING GRAND JURY :

ORDER SEALING PRESENTMENT NO. 4

AND NOW, this 20th day of July, 2022, the Court orders that the within Presentment No. 4 shall be sealed and no person shall disclose a return of the Presentment except when necessary for issuance and execution of process, or as otherwise directed or permitted by order of the Supervising Judge.

BY THE COURT:



MIA R. PEREZ
Supervising Judge

I HEREBY CERTIFY the foregoing to be
a true and correct copy of the original
Order as filed in this
office:

Date: 7-22-22

DD

Active Criminal Records
Criminal Motion Court Clerk
First Judicial District of Pa.

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

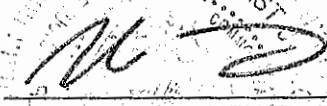
CRIMINAL TRIAL DIVISION

IN RE: :
: Misc. No. 1458-2021
THE THIRTY-FIRST COUNTY :
: Notice C-9
INVESTIGATING GRAND JURY :

ORDER ACCEPTING PRESENTMENT NO. 4

AND NOW, this 20th day of July, 2022, having examined Presentment No. 4 of the Thirty-First County Investigating Grand Jury, this Court finds that the Presentment is within the authority of that Grand Jury and is otherwise in accordance with the provisions of the Investigating Grand Jury Act, 42 Pa. C.S. §§ 4541-52. In view of those findings, the Court hereby accepts the Presentment.

BY THE COURT:


MIA R. PEREZ
Supervising Judge

I HEREBY CERTIFY the foregoing to be
a true and correct copy of the original
Order as filed in this
office:

Date:

7-22-22

DD

Active Criminal Records
Criminal Motion Court Clerk
First Judicial District of Pa.

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

CRIMINAL TRIAL DIVISION

IN RE:	:	
	:	Misc. No. 1458-2021
THE THIRTY-FIRST COUNTY	:	
	:	Notice C-9
INVESTIGATING GRAND JURY	:	

PRESENTMENT NO. 4

TO THE HONORABLE MIA R. PEREZ, SUPERVISING JUDGE:

We, the Thirty-First County Investigating Grand Jury, duly charged to inquire into offenses against the criminal laws of the Commonwealth, have obtained knowledge of such matters from witnesses sworn by the Court and testifying before us. We find reasonable grounds to believe that various violations of the criminal laws have occurred. So finding with not fewer than twelve concurring, we do hereby make this Presentment to the Court.

Done this 16 day of June, 2022.



FINDINGS OF FACT

I. SUMMARY

In or about July 2021 through October 2021, Khalif Workman (a/k/a “Pizza Man”) was a correctional officer at the Philadelphia Department of Prisons. During that period, Workman smuggled narcotics and other prohibited items into Riverside Correctional Facility with intent to distribute to inmates. In exchange, Workman took bribes of more than \$20,000.

Workman acted as part of a broader conspiracy and enterprise, principally organized by then-RCF inmate Barry Garland (a/k/a “Barry Bones”). As detailed below, the criminal objectives of that enterprise included acquiring illegal narcotics, smuggling contraband into RCF, delivering that contraband to other inmates within RCF, and receiving and distributing proceeds of those unlawful activities.

While in custody at RCF, Garland used a contraband cell phone to call and text other co-conspirators and to direct their activities in support of the criminal enterprise. Garland directed and coordinated co-conspirators outside the prison to acquire contraband for Workman to smuggle, to receive other inmates’ money to purchase the contraband, and to pay bribes to Workman. Inside the prison, Garland provided contraband to co-conspirator inmates, who would sell to other inmates and give proceeds back to Garland.

Garland used some of the proceeds to purchase arms for his co-conspirators, after one of Garland’s associates was murdered in Southwest Philadelphia on October 6. Two days after that murder, Garland told another inmate that his “right hand just got smoked,” that Garland’s associates “need[ed] more guns,” and that Garland therefore “need[ed] money to do that shit up out there.” Two weeks later, Garland paid for at least one AR-style firearm and arranged for it to be delivered to a co-conspirator outside the prison.

That AR-style firearm has not yet been recovered.

II. THE DISCOVERY OF CONTRABAND IN GARLAND'S CELL AND THE SUBSEQUENT INVESTIGATION INTO THE SMUGGLING CONSPIRACY.

1. On the morning of October 19, 2021, Correctional Officer ("C/O") Ernest Blair uncovered evidence that led to the discovery of the enterprise and conspiracy at issue in this Presentment.

2. In particular, on that date, C/O Blair searched the cell occupied by inmate Barry Garland in Riverside Correctional Facility ("RCF"), based on information C/O Blair received that Garland possessed contraband.¹

3. Within a light fixture, C/O Blair found two Ziplock baggies filled with a green leafy substance, one Ziplock baggie filled with a brown tobacco-like substance, a plastic bag with unused small Ziplock packets, and other items.²

4. In addition to searching Garland's cell, C/O Blair also searched Garland's person. Within Garland's waistband, C/O Blair found a cell phone.³

5. C/O Blair provided the contraband items to Det. Jess Moulder at the Northeast Detective Division. Det. Moulder placed the cell phone on property receipt #3528513, and the remainder of the items on property receipt #3528512.⁴

6. The Philadelphia Police Department Chemistry Unit Laboratory analyzed the substances on property receipt #3528512 and concluded that the green leafy substance contained 4-flouro MDMB-butica, a Schedule I controlled substance.⁵

[REDACTED]

¹ Demonstrative 9B; Blair 04/07/2022 N.T. at 17-18.

² Demonstrative 9B; Blair 04/07/2022 N.T. at 21.

³ Blair 04/07/2022 N.T. at 23.

⁴ Blair 04/07/2022 N.T. at 25-31; Ex. 63; Ex. 64.

⁵ Demonstrative 9A.

7. In November 2021, Det. Allan Relova of the Southwest Detective Division obtained a warrant authorizing a search of the data contained on Garland's cell phone on property receipt #3528513.⁶

8. Tiffany Brown, an analyst assigned to the Philadelphia District Attorney's Office Gun Violence Task Force, executed that search warrant by forensically extracting the contents of Garland's cell phone.⁷

9. John Krawczyk, a detective assigned to the District Attorney's Office, reviewed the contents of Garland's phone. Based on information obtained from that phone, Det. Krawczyk obtained a search warrant for account information and financial transaction data from the money transmitting service "Cash App," operated by Block Inc.⁸

10. This Grand Jury heard testimony from C/O Blair regarding the search of Garland's person and prison cell, and it heard testimony from Det. Krawczyk regarding the results of the subsequent investigation.

11. This Grand Jury also reviewed evidence extracted from Garland's phone, financial records relating to the conspiracy obtained by warrant or Grand Jury subpoena, and other evidence.

⁶ Demonstrative 9B.

⁷ Ex. 71.

⁸ Krawczyk 04/07/2022 N.T. at 10.

III. IDENTITIES OF PERSONS CONNECTED TO THE CONSPIRACY.

12. Garland communicated with other co-conspirators by text message, by passing messages through other co-conspirators, and by other means. In their communications, Garland and other co-conspirators often used nicknames or aliases.

13. The following table shows the true identities of certain persons connected to the conspiracy, and certain nickname(s), alias(es), and phone number(s) that correspond with those persons:

Name	Nickname(s)/Alias(es)	Phone Number(s)
Khalif Workman ⁹	“Pizza,” “Pizza Man”	
Barry Garland ¹⁰	“Barry Bones,” “Bones”	
Lashawnda Crawford ¹¹	“My Hitta,” “My Hitta 2,” “Mira,” “Mira Brown,” “Black Beauty”	
Ashline Garcia Cruz ¹²	“Folks2”	
Nigier Jones ¹³	“Gbone”	
Barry Jones ¹⁴	“Big Slime”	

14. During the relevant period, co-conspirator Khalif Workman was a correctional officer employed by the Philadelphia Department of Prisons (“PDP”), assigned to RCF, 8151 State Road, Philadelphia. According to PDP records, Workman’s last day working at RCF was

⁹ Demonstrative 1B-1C, 6A-6C; Ex. 144-150.

¹⁰ Ex. 70; Ex. 74; Demonstrative 4I; Blair 04/07/2022 N.T. at 28-34.

¹¹ Demonstrative 1D-1H.

¹² Demonstrative 1I-1J.

¹³ Demonstrative 1O-1P, 8D-8E.

¹⁴ Demonstrative 7A-7B; Blair 04/07/2022 N.T. at 50-51; Ex. 69.

October 6, 2021.¹⁵ Those records reflect that Workman voluntarily resigned from the PDP on October 25, 2021.¹⁶

15. During the relevant period, co-conspirator Barry Garland was an inmate at RCF.¹⁷ Garland is ineligible to possess, control, or transfer a firearm because he was convicted of robbery in 2010.¹⁸

16. During the relevant period, co-conspirator Lashawnda Crawford controlled a Cash App account with display names “Black Beauty,” “Chocolate Bunni,” and “Lashawnda Crawford.”¹⁹

17. During the relevant period, co-conspirator Ashline Garcia Cruz controlled a Cash App account associated with display names “Ashline Garcia” and “Ashline Cruz.”²⁰

18. During the relevant period, co-conspirator Nigier Jones controlled a Cash App account associated with display names “Gbone534” and “Ricko.”²¹ On February 6, 2022, N. Jones was murdered.²²

19. During the relevant period, co-conspirator Barry Jones was an inmate at RCF.²³

¹⁵ Ex. 150 at CITY-PDP-003967-70.

¹⁶ Ex. 144; Ex. 145.

¹⁷ Blair 04/07/2022 N.T. at 36-37, 49-50; Ex. 69.

¹⁸ Demonstrative 9C.

¹⁹ Demonstrative 1G.

²⁰ Demonstrative 1I.

²¹ Demonstrative 1P.

²² Demonstrative 8E.

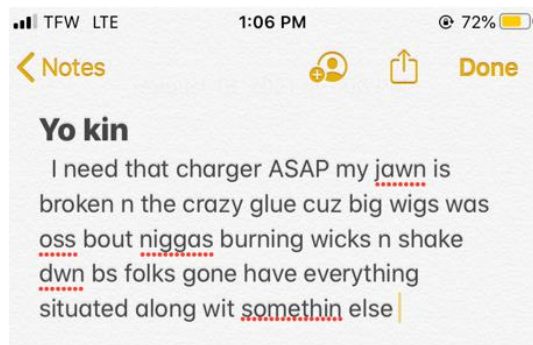
²³ Blair 04/07/2022 N.T. at 50-51; Ex. 69.

IV. UNDER THE DIRECTION OF GARLAND, CO-CONSPIRATORS OUTSIDE THE PRISON ACQUIRED CONTRABAND FOR WORKMAN TO SMUGGLE INTO THE PRISON.

20. In furtherance of the enterprise and conspiracy, Garland gave instructions to co-conspirators outside the prison, so that those co-conspirators would acquire contraband and other prohibited items for Workman to smuggle into RCF.

Using Crawford as a Go-Between, Garland Asked Workman to Provide Specific Items of Contraband and Discusses Payment to Workman for Smuggling Contraband Items.

21. On August 13, 2021, at 5:07 PM UTC,²⁴ Garland texted Crawford the following message, which Garland stated was “for pizza” (i.e., for Workman):²⁵



22. Crawford responded, “Ok,” and sent a text message “liking” the image.²⁶

23. On August 17, 2021, at 10:27 PM UTC, Garland texted Crawford: “See if pizza a do 6packs for a stack.” Crawford responded by “disliking” that message, and stating, “pizza said no cant.”²⁷

²⁴ The forensic extraction provides times in Universal Time Code (“UTC”). UTC is four hours ahead of the time zone for Philadelphia during daylight savings time.

²⁵ Demonstrative 3B.

²⁶ Demonstrative 3B.

²⁷ Demonstrative 3C.

24. On September 4, 2021, at 9:15 PM UTC, Garland texted Crawford the following message to be sent to Workman:²⁸



25. Based on context and testimony, the term “jack” refers to a cell phone.²⁹

26. Crawford responded, “Sent.”³⁰

Crawford Dropped Off Items for Workman to Pick Up and Smuggle into RCF.

27. In late August 2021, in coordination with Garland, Crawford left contraband items in a black plastic bag in a place for Workman to pick up, so that he would smuggle those items into RCF.

28. In particular, on or about August 28, 2021, Crawford sent the following text message and image to Garland, and Garland responded with the following text messages:³¹

Timestamp	From	Message
8/28/2021 12:50:59 AM(UTC+0)	Crawford	So wen pizza getting the package tonight

²⁸ Demonstrative 3D; Krawczyk 04/07/2022 N.T. at 28-29; Ex. 73 (My Hitta Report at 178-179).

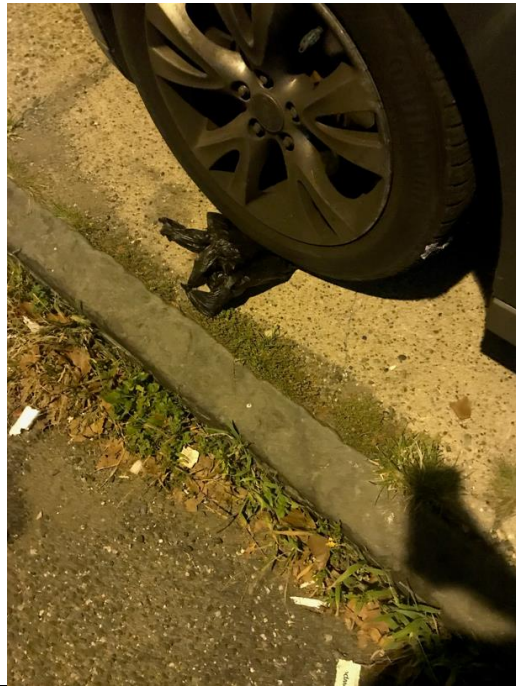
²⁹ Krawczyk 04/07/2022 N.T. at 23-24; Krawczyk 04/22/2022 N.T. at 62-63.

³⁰ Demonstrative 3D.

³¹ Demonstrative 3A.

8/28/2021 12:59:07 AM(UTC+0)

Crawford



8/28/2021 1:26:06 AM(UTC+0)

Garland

Liked “So wen pizza getting the package tonight”

29. The following day, on August 29, 2021, Crawford and Garland exchanged the following text messages, in which Crawford confirmed the “[p]ackage” had been “sen[t] off”:³²

Timestamp	From	Message
8/29/2021 2:42:54 PM(UTC+0)	Crawford	Rd i can ask pizza
8/29/2021 2:43:02 PM(UTC+0)	Crawford	To take me
8/29/2021 2:43:17 PM(UTC+0)	Garland	Cool n give hime 1500
8/29/2021 2:43:28 PM(UTC+0)	Crawford	Rd
8/29/2021 2:43:44 PM(UTC+0)	Crawford	Am i givin him the over package
8/29/2021 2:43:50 PM(UTC+0)	Garland	Liked “Am i givin him the over package ”
. . .		
8/29/2021 3:14:59 PM(UTC+0)	Crawford	Package send off
8/29/2021 3:15:03 PM(UTC+0)	Garland	Liked “Package send off”

³² Demonstrative 8H.

Garland Arranged for Nigier Jones to Acquire K2 and Provide it to Person 1.

30. As another example, in October 2021, Garland arranged for Nigier Jones (a/k/a “Gbone”) to obtain a controlled substance known as K2, and then arranged for N. Jones to provide that K2 to Person 1.

31. In text messages on October 4, 2021, Garland explains to N. Jones that he needs “sum super gas k2.” Based on context and his training and experience, Det. Krawczyk testified that K2 is a common term for synthetic marijuana and that “super gas k2” refers to “really strong K2” or K2 that contains an additive to make it stronger.³³

32. In response, N. Jones indicates agreement by responding, “Ard.” N. Jones also asks if Garland would be sending him money by Cash App and if N. Jones should drop off the K2 with Crawford (a/k/a “Mira”):³⁴

Timestamp	From	Message
10/4/2021 6:21:06 PM(UTC+0)	Garland	I need ten pack of sum super gas k2 I got the money just get the work for me n I got u need it ASAP
10/4/2021 6:21:12 PM(UTC+0)	Garland	N tell Lupo call me ASAP
10/4/2021 7:40:23 PM(UTC+0)	N. Jones	Ard so what yu gonna cash app me the bread an yu want me to get it an drop it off on Mira
10/4/2021 8:06:24 PM(UTC+0)	Garland	What’s ya cswats ya cash app
10/4/2021 8:14:35 PM(UTC+0)	N. Jones	\$gbone534
10/4/2021 8:18:47 PM(UTC+0)	Garland	Get 12 packs
10/4/2021 8:18:54 PM(UTC+0)	Garland	When u done I got u
10/4/2021 8:19:31 PM(UTC+0)	N. Jones	Ard bet

³³ Demonstrative 2C; Krawczyk 04/07/22 N.T. at 21; Krawczyk 04/22/2022 N.T. at 43-44; Krawczyk 05/13/2022 N.T. 64-65.

³⁴ Demonstrative 2C.

33. Two hours later, Garland and N. Jones exchange further text messages, where N. Jones explains that he is currently purchasing K2. Garland directs him to make the purchase. Garland then tells N. Jones that Crawford is not at home and that another person would accept the delivery.³⁵

Timestamp	From	Message
10/4/2021 10:16:09 PM(UTC+0)	Garland	Did u do it yet kin
10/4/2021 10:55:09 PM(UTC+0)	N. Jones	I'm up here now
10/4/2021 10:55:25 PM(UTC+0)	Garland	Make sure it's gas kin
10/4/2021 11:33:26 PM(UTC+0)	N. Jones	I'm testing some shit out now
10/4/2021 11:33:46 PM(UTC+0)	Garland	U sure u wanna do it get a player to
10/4/2021 11:34:16 PM(UTC+0)	N. Jones	I'm at my manz k2 crib
10/4/2021 11:34:25 PM(UTC+0)	Garland	Ook
10/5/2021 12:25:04 AM(UTC+0)	N. Jones	They said it good they dipping an all
10/5/2021 12:25:13 AM(UTC+0)	Garland	Rd grab it
10/5/2021 12:25:27 AM(UTC+0)	N. Jones	I'm about to now
10/5/2021 12:25:45 AM(UTC+0)	Garland	Mira gf gone grab it from u at Mira crib just lmk when u on the way
10/5/2021 12:26:20 AM(UTC+0)	N. Jones	Ard
10/5/2021 12:34:09 AM(UTC+0)	Garland	Ok thanks kin

34. Approximately one hour later, Garland tells N. Jones that the person is ready to receive delivery.³⁶

Timestamp	From	Message
10/5/2021 1:29:43 AM(UTC+0)	Garland	She ready
10/5/2021 1:32:17 AM(UTC+0)	N. Jones	Ard

³⁵ Demonstrative 2C.

³⁶ Demonstrative 2C.

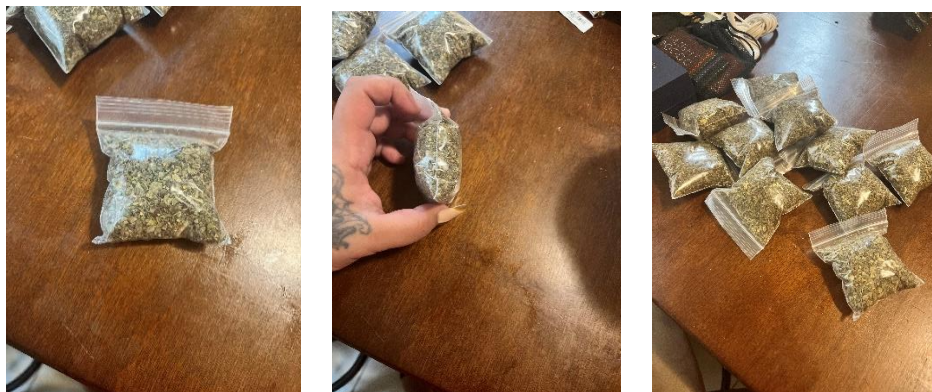
35. About twenty minutes later, Garland text messaged Person 1 to provide the contact information for N. Jones and to arrange a place for N. Jones to meet Person 1 to pass off the contraband.³⁷

Timestamp	From	Message
10/5/2021 1:50:27 AM(UTC+0)	Garland	[sends "Gbone.vcf"]
10/5/2021 1:54:35 AM(UTC+0)	Garland	Did u call him
10/5/2021 1:55:17 AM(UTC+0)	Garland	
10/5/2021 1:55:22 AM(UTC+0)	Garland	Ok thank bby
10/5/2021 1:55:27 AM(UTC+0)	Garland	I got u
10/5/2021 1:56:20 AM(UTC+0)	Garland	Where u want him to meet u he think he comin to the crib
10/5/2021 1:59:41 AM(UTC+0)	Person 1	The house
10/5/2021 1:59:53 AM(UTC+0)	Garland	Rd

At Garland's Direction, Cruz Provided Narcotics to Crawford.

36. On another occasion in October 2021, Garland directed Crawford to meet Cruz at a specific time and place, where Cruz gave narcotics to Crawford.

37. On October 13, 2021, at approximately 2:57 PM UTC, Cruz sent Garland the following photos by text message.³⁸



³⁷ Demonstrative 2D.

³⁸ Demonstrative 2A.

38. Garland replied by texting, “Can u put it in ya palm so I can get a better measure of the size.” In response, Cruz sent Garland the following photos by text message:³⁹



39. Next, Garland texted Cruz the phone number for Crawford, and wrote: “This my sis [phone number] she waitin on the call now same spot on broad street.”⁴⁰

40. Cruz responded, “Ard I’m just getting up she’s going to have to give me some time.”⁴¹

41. Approximately two hours later, Cruz and Garland exchanged the following messages:⁴²

Timestamp	From	Message
10/13/2021 5:15:28 PM(UTC+0)	Cruz	It went straight to vm
10/13/2021 5:28:22 PM(UTC+0)	Garland	Is it ok for me to give her the number
...		
10/13/2021 5:39:58 PM(UTC+0)	Cruz	I just drop that off

³⁹ Demonstrative 2A.

⁴⁰ Demonstrative 2A.

⁴¹ Demonstrative 2A.

⁴² Demonstrative 2A.

42. At approximately the same time, Garland confirmed that Crawford received the narcotics from Cruz, by exchanging the following messages:⁴³

Timestamp	From	Message
10/13/2021 5:28:51 PM(UTC+0)	Garland	She tried to call
10/13/2021 5:28:54 PM(UTC+0)	Garland	U
10/13/2021 5:29:09 PM(UTC+0)	Garland	It's the same girl that dropped that shit off the first time
10/13/2021 5:30:33 PM(UTC+0)	Crawford	She on her way
10/13/2021 5:34:00 PM(UTC+0)	Garland	Idk
10/13/2021 5:34:09 PM(UTC+0)	Garland	Or is u telling me that she is
10/13/2021 5:34:14 PM(UTC+0)	Crawford	Liked "Or is u telling me that she is"
10/13/2021 5:34:22 PM(UTC+0)	Garland	Loved "Or is u telling me that she is"
10/13/2021 5:45:48 PM(UTC+0)	Garland	U Got it right
10/13/2021 5:49:18 PM(UTC+0)	Crawford	Liked "U Got it right"
10/13/2021 5:49:33 PM(UTC+0)	Garland	Thank u

Garland Arranged for Person 2 to Provide Suboxone to Crawford.

43. On October 15 and 16, 2021, Garland arranged for Crawford to acquire suboxone ("subs") from Person 2 (a/k/a "Rambo") and for Crawford to obtain a charger, Newport cigarettes ("ports"), and other items, by sending Crawford the following text messages:⁴⁴

Timestamp	From	Message
10/15/2021 5:03:38 PM(UTC+0)	Garland	Hey ms dopefein I'll have the subs today
10/15/2021 5:05:57 PM(UTC+0)	Crawford	Liked "Hey ms dopefein I'll have the subs today"
...		
10/15/2021 5:09:02 PM(UTC+0)	Garland	Ima get a zone to u
10/15/2021 5:09:15 PM(UTC+0)	Garland	When Rambo drop the subs off
10/15/2021 5:09:22 PM(UTC+0)	Garland	N I need charger 🖱️
10/15/2021 5:09:28 PM(UTC+0)	Crawford	

⁴³ Demonstrative 2B.

⁴⁴ Demonstrative 2G, 8G.

10/15/2021 5:09:41 PM(UTC+0)	Garland	So it's 5 packs of ports two
...		
10/15/2021 5:10:03 PM(UTC+0)	Garland	When u get a second lmk everything u gettin so I can Fross check
10/15/2021 5:10:06 PM(UTC+0)	Garland	Cross
10/15/2021 5:10:10 PM(UTC+0)	Crawford	Write a list of everything yu want an need
10/15/2021 5:10:14 PM(UTC+0)	Garland	Liked "Write a list of everything yu want an need"
10/15/2021 5:10:22 PM(UTC+0)	Crawford	So I check it off as I bag it up
...		
10/16/2021 9:18:45 PM(UTC+0)	Garland	Rambo home give u 30 more subs

In October 2021, Before Delivering the Final Contraband Package, Workman Stops Going to Work and Ultimately Resigns from the PDP.

44. On October 8, 2021, Garland and Person 2 exchanged text messages, in which Garland explained that Workman (the "co bull") had "quit." Garland then explained that he believed he had convinced Workman to "pull one more stunt".⁴⁵

Timestamp	From	Message
10/8/2021 7:21:02 PM(UTC+0)	Garland	Nvm kin co bull just quit
10/8/2021 7:22:26 PM(UTC+0)	Person 2	Whatttttt
10/8/2021 7:23:02 PM(UTC+0)	Garland	Hold on I'm tryna finess him but his bm just did sum weird shit left Philly n left kids at his mom crib
10/8/2021 7:23:10 PM(UTC+0)	Garland	Ima let u kno in a few mins
10/8/2021 7:30:14 PM(UTC+0)	Person 2	
10/8/2021 7:32:43 PM(UTC+0)	Garland	Rd it's a go get em he just gone pull one more stunt

⁴⁵ Demonstrative 2E.

45. According to PDP's Workforce Telestaff records, Workman did not work any regular hours after October 6, 2021.⁴⁶ PDP records indicate that, after that date, Workman used sick leave, sick advance leave, and vacation leave to cover hours he would have worked.⁴⁷

46. As described above, between October 4 and October 16, Garland arranged for Person 1 and Crawford to acquire narcotics from N. Jones, Cruz, and Person 2, intending for Workman to smuggle those narcotics into RCF.

47. On October 19, 2021, the conspiracy was interrupted when C/O Blair discovered contraband in Garland's cell and on his person, as referred to above in Part II.⁴⁸

48. On October 25, 2021, Workman resigned from the PDP.⁴⁹

V. IN CONCERT WITH GARLAND, CO-CONSPIRATORS OUTSIDE THE PRISON HANDLE PAYMENTS FOR CONTRABAND AND SEND BRIBES TO WORKMAN.

49. As detailed below, in furtherance of the enterprise and conspiracy, Garland sent and received, and directed certain co-conspirators to send and receive, funds derived from unlawful activity using money transmitting services (such as Cash App) and traditional banks. That included receiving funds sent by or on behalf of other inmates as payment for contraband, sending funds to Workman as bribes, and conducting financial transactions to conceal the funds and to prevent their possible seizure.

⁴⁶ Ex. 150 at CITY-PDP-003970.

⁴⁷ Ex. 149; Ex. 150 at CITY-PDP-003971-74.

⁴⁸ Demonstrative 9B.

⁴⁹ Ex. 144; Ex. 145.

Crawford Received Payments for Contraband for Garland and Routinely Updated Garland About the Money Received as Payment.

50. On numerous occasions during the relevant period, Crawford, acting at Garland's direction, accepted electronic payments for the contraband that was smuggled into RCF and sold to other inmates.

51. During the relevant time, Crawford maintained a Cash App account associated with the display names "Black Beauty," "Chocolate Bunni," and "Lashawnda Crawford." That Cash App account received numerous transfers on behalf of inmates at RCF.⁵⁰

52. When Crawford received a payment on behalf of an inmate, she would routinely text message Garland informing that the payment was made. Frequently, the payors would identify the inmate who should be credited for the payment in an optional "subject" line for the transaction.⁵¹

53. For example, on August 10, 2021, at 5:35 PM UTC, Garland sent Crawford the following text message:⁵²

Timestamp	From	Message
8/10/2021 5:35:24 PM(UTC+0)	Garland	N e body send cash app

⁵⁰ Demonstrative 1F-1G.

⁵¹ Demonstrative 4A-4D.

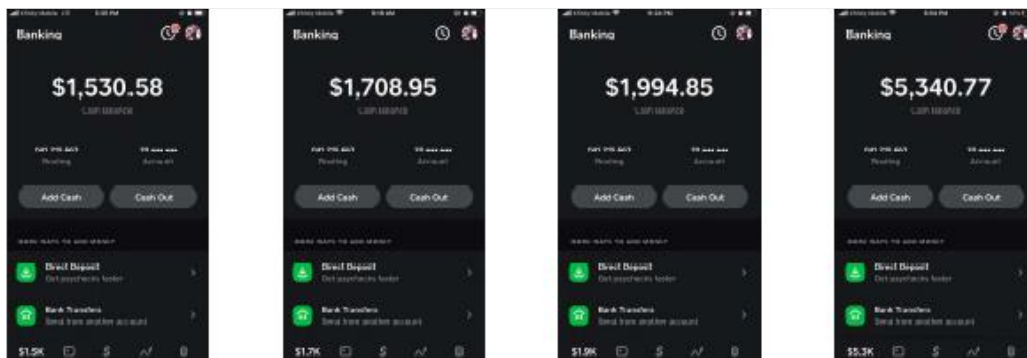
⁵² Demonstrative 4A.

54. In response, Crawford sent Garland the following image:⁵³



55. On numerous other occasions during the relevant period, Crawford sent Garland screenshots that reflected deposits into her Cash App account with subject lines identifying other inmates.⁵⁴

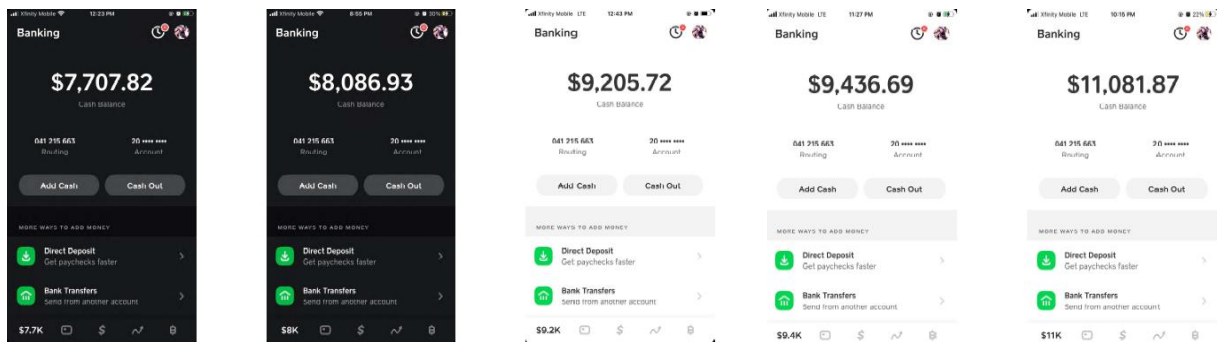
56. Additionally, during the relevant period, Crawford sent Garland screenshots showing the balance in the Cash App account she was using to receive smuggling proceeds. For example, during the relevant period, Crawford sent the following screenshots to Garland to update him about the running balance in that account:⁵⁵



⁵³ Demonstrative 4A.

⁵⁴ Demonstrative 4D.

⁵⁵ Demonstrative 4E.



At Garland's Direction, Co-conspirators Sent Bribes to Workman.

57. Acting at Garland's direction, Crawford and Person 6 (a/k/a "Feej") each used Cash App to send bribes to Workman for smuggling items into the prison.

58. For example, on August 9, 2021, Garland sent the following text message to Crawford that directed her to make payment to Workman (a/k/a "Pizza Man"):⁵⁶

Timestamp	From	Message
8/9/2021 10:31:10 PM(UTC+0)	Garland	Send pizza man 1500 n tell him I need the glue ASAP

59. Cash App records reflect that, on the next day, Crawford's account transmitted \$1,500 to Workman's account with a subject line referencing "Pizza man":⁵⁷

Attempted P2P Payments

Date	Status	Total	Subject	Sender	Sndr. Source	Action	Recipient
2021-08-10 01:58:59 UTC	PAID_OUT	USD 1,500.00	Pizza 🍕 man	Black Beauty	CASH_BALANCE	Paying	Khalif Workman

60. As another example, on August 29, 2021, Garland sent the following text message directing Crawford to make payment to Workman:⁵⁸

Timestamp	From	Message
8/29/2021 2:42:54 PM(UTC+0)	Crawford	Rd i can ask pizza
8/29/2021 2:43:02 PM(UTC+0)	Crawford	To take me

⁵⁶ Demonstrative 1A.

⁵⁷ Demonstrative 4F.

⁵⁸ Demonstrative 8F.

8/29/2021 2:43:17 PM(UTC+0)	Garland	Cool n give hime 1500
8/29/2021 2:43:28 PM(UTC+0)	Crawford	Rd

61. Cash App financial records reflect that, approximately 13 minutes later, Crawford’s account transmitted \$1,500 to Workman’s account.⁵⁹

Attempted P2P Payments							
Date	Status	Total	Subject	Sender	Sndr. Source	Action	Recipient
2021-08-29 14:56:26 UTC	PAID_OUT	USD 1,500.00		Black Beauty	CASH_BALANCE	Paying	Khalif Workman

62. On another occasion, on September 30, 2021, Garland instructs Person 6 (a/k/a “Feej”) to send \$200 to Workman.⁶⁰

Timestamp	From	Message
9/30/2021 11:15:58 PM(UTC+0)	Garland	Send the \$200 to pizza

63. Cash App financial records reflect that, several hours earlier, Person 6 had sent \$200 to Workman’s Cash App account. Those records also reflect that two days earlier, Person 6 had sent \$1,700 to Workman’s Cash App account.⁶¹

Attempted P2P Payments							
Date	Status	Total	Subject	Sender	Sndr. Source	Action	Recipient
2021-09-30 15:33:54 UTC	PAID_OUT	USD 200.00		Feej	CASH_BALANCE	Paying	Khalif Workman
2021-09-28 03:54:16 UTC	PAID_OUT	USD 1,700.00		Feej	CASH_BALANCE	Paying	Khalif Workman

After Receiving Bribes, Workman Promptly Transferred the Funds From His Cash App Account to His PFCU Account.

64. In addition to his Cash App account, Workman also has an account ending in 8733 at Philadelphia Federal Credit Union (“PFCU”).⁶²

⁵⁹ Demonstrative 4F.

⁶⁰ Demonstrative 8B.

⁶¹ Demonstrative 4F.

⁶² Demonstrative 6A-6C.

65. Financial records show that, when a co-conspirator sent Workman a Cash App transfer greater than \$1,000, Workman quickly transferred the funds from the Cash App account to his PFCU account 8733. That pattern indicates that Workman was aware of the transfers into his Cash App account and that he controlled where the funds were ultimately sent.⁶³

66. In particular, according to Cash App records, between July 31 and September 30, 2021, co-conspirators Crawford (a/k/a “Black Beauty”) and Person 6 (a/k/a “Feej”) paid bribes into Workman’s Cash App account totaling \$23,380, through the following transactions (with transactions \$1,000 or greater shown in grey):⁶⁴

Attempted P2P Payments

Date	Status	Total	Subject	Sender	Action	Recipient
2021-09-30 15:33:54 UTC	PAID_OUT	USD 200.00		Feej	Paying	Khalif Workman
2021-09-28 03:54:16 UTC	PAID_OUT	USD 1,700.00		Feej	Paying	Khalif Workman
2021-09-13 23:53:54 UTC	PAID_OUT	USD 1,750.00		Black Beauty	Paying	Khalif Workman
2021-09-12 01:18:40 UTC	PAID_OUT	USD 6,000.00		Black Beauty	Paying	Khalif Workman
2021-09-01 00:36:09 UTC	PAID_OUT	USD 2,000.00	rent due	Black Beauty	Paying	Khalif Workman
2021-08-29 14:56:26 UTC	PAID_OUT	USD 1,500.00		Black Beauty	Paying	Khalif Workman
2021-08-28 01:57:26 UTC	PAID_OUT	USD 1,750.00		Black Beauty	Paying	Khalif Workman
2021-08-24 04:13:21 UTC	PAID_OUT	USD 500.00		Black Beauty	Paying	Khalif Workman
2021-08-23 01:55:56 UTC	PAID_OUT	USD 100.00		Black Beauty	Paying	Khalif Workman
2021-08-22 14:05:50 UTC	PAID_OUT	USD 130.00	j’s	Black Beauty	Paying	Khalif Workman
2021-08-19 16:27:48 UTC	PAID_OUT	USD 1,500.00	Rent	Black Beauty	Paying	Khalif Workman
2021-08-15 17:01:13 UTC	PAID_OUT	USD 1,700.00		Black Beauty	Paying	Khalif Workman
2021-08-10 01:58:59 UTC	PAID_OUT	USD 1,500.00	Pizza man	Black Beauty	Paying	Khalif Workman
2021-08-06 03:38:36 UTC	PAID_OUT	USD 1,300.00		Black Beauty	Request	Khalif Workman
2021-08-04 00:43:35 UTC	PAID_OUT	USD 500.00	pizza man	Black Beauty	Paying	Khalif Workman
2021-08-02 23:42:30 UTC	PAID_OUT	USD 750.00	pizza man	Black Beauty	Paying	Khalif Workman
2021-07-31 20:15:38 UTC	PAID_OUT	USD 500.00	pizza man	Black Beauty	Request	Khalif Workman

⁶³ Demonstrative 6A-6C.

⁶⁴ Demonstrative 4F, 6C.

67. Cash App records show that, during that same period, Workman transferred funds from his Cash App account to his PFCU account totaling \$23,169.81, through the following transactions:⁶⁵

Attempted Transfers Date	Status	Amount	Source	Action	Target
2021-09-28 03:58:09 UTC	COMPLETE	USD 1,700.00	CASH_BALANCE	Cash Out	
2021-09-14 00:15:52 UTC	COMPLETE	USD 1,750.00	CASH_BALANCE	Cash Out	
2021-09-12 03:04:56 UTC	COMPLETE	USD 6,002.00	CASH_BALANCE	Cash Out	
2021-09-01 19:41:11 UTC	COMPLETE	USD 2,000.00	CASH_BALANCE	Cash Out	
2021-08-29 15:34:37 UTC	COMPLETE	USD 1,500.00	CASH_BALANCE	Cash Out	
2021-08-28 04:59:27 UTC	COMPLETE	USD 1,750.00	CASH_BALANCE	Cash Out	
2021-08-26 02:17:35 UTC	COMPLETE	USD 500.00	CASH_BALANCE	Cash Out	
2021-08-21 18:29:00 UTC	COMPLETE	USD 1,967.81	CASH_BALANCE	Cash Out	
2021-08-19 18:58:34 UTC	COMPLETE	USD 1,500.00	CASH_BALANCE	Cash Out	
2021-08-15 17:14:37 UTC	COMPLETE	USD 1,700.00	CASH_BALANCE	Cash Out	
2021-08-10 11:03:29 UTC	COMPLETE	USD 1,500.00	CASH_BALANCE	Cash Out	
2021-08-06 04:08:46 UTC	COMPLETE	USD 1,300.00	CASH_BALANCE	Cash Out	

68. In the table below, the middle column shows the bribe payments larger than \$1,000 from co-conspirators into Workman's Cash App account. The column on the right shows the transfers during that period from Workman's Cash App account to his PFCU account. As that table shows, after Workman received a Cash App transfer from a co-conspirator greater than \$1,000, he transferred that money into his PFCU account a short time later.⁶⁶

⁶⁵ Demonstrative 6C.

⁶⁶ Demonstrative 6A-6C.

Timestamp	Transfers >\$1,000 From Co-Conspirator to Workman's Cash App Account	Transfer From Workman's Cash App Account to Workman's PFCU Account
2021-08-06 03:38:36 UTC	USD 1,300.00	
2021-08-06 04:08:46 UTC		USD 1,300.00
2021-08-10 01:58:59 UTC	USD 1,500.00	
2021-08-10 11:03:29 UTC		USD 1,500.00
2021-08-15 17:01:13 UTC	USD 1,700.00	
2021-08-15 17:14:37 UTC		USD 1,700.00
2021-08-19 16:27:48 UTC	USD 1,500.00	
2021-08-19 18:58:34 UTC		USD 1,500.00
2021-08-21 18:29:00 UTC		USD 1,967.81
2021-08-26 02:17:35 UTC		USD 500.00
2021-08-28 01:57:26 UTC	USD 1,750.00	
2021-08-28 04:59:27 UTC		USD 1,750.00
2021-08-29 14:56:26 UTC	USD 1,500.00	
2021-08-29 15:34:37 UTC		USD 1,500.00
2021-09-01 00:36:09 UTC	USD 2,000.00	
2021-09-01 19:41:11 UTC		USD 2,000.00
2021-09-12 01:18:40 UTC	USD 6,000.00	
2021-09-12 03:04:56 UTC		USD 6,002.00
2021-09-13 23:53:54 UTC	USD 1,750.00	
2021-09-14 00:15:52 UTC		USD 1,750.00
2021-09-28 03:54:16 UTC	USD 1,700.00	
2021-09-28 03:58:09 UTC		USD 1,700.00

Garland Directs Crawford to Make Money Transfers to Avoid the Possible Seizure of Funds.

69. On at least one occasion, Crawford, acting at Garland's direction, conducted financial transactions designed to conceal the source of and avoid the possible freezing or seizure of illegally obtained funds.

70. In particular, on October 13, 2021, Garland and Crawford exchanged the following text messages:⁶⁷

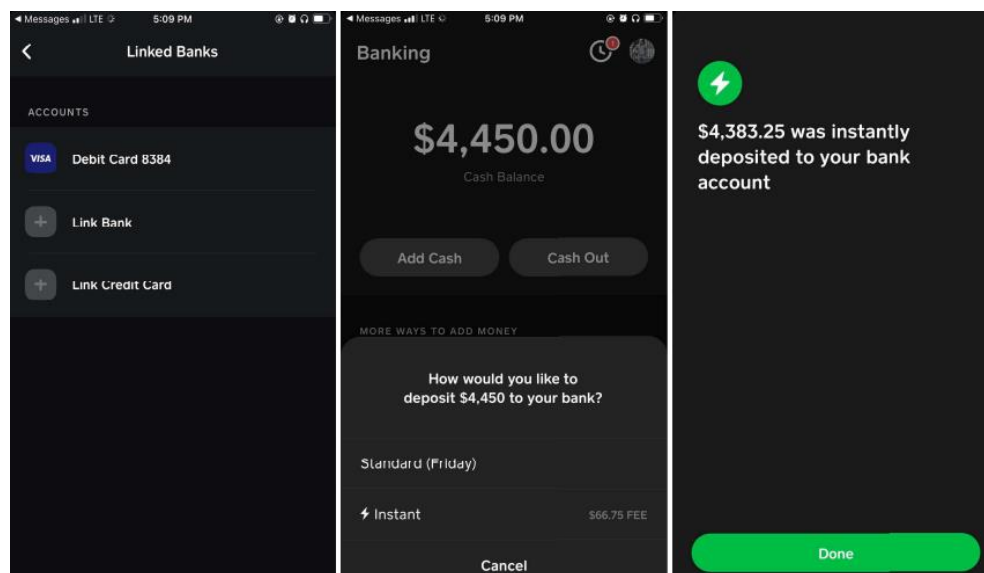
Timestamp	From	Message
10/13/2021 7:58:53 PM(UTC+0)	Garland	Sb reported my account
10/13/2021 7:59:02 PM(UTC+0)	Garland	I got 4500 on there
10/13/2021 8:02:26 PM(UTC+0)	Garland	Yea u gotta do it sis

⁶⁷ Demonstrative 4H.

10/13/2021 8:02:56 PM(UTC+0)	Garland	Email [REDACTED]@gmail.com
10/13/2021 9:00:21 PM(UTC+0)	Crawford	Liked "Yea u gotta do it sis "

71. Next, Crawford sent text messages requesting confirmation codes sent to Garland from Cash App and requesting Garland's PIN, which Garland provided.⁶⁸

72. Crawford then sent screenshots to Garland, showing that Crawford had transferred \$4,450 from her Cash App account to a Visa debit card ending 8384. The screenshots show that Crawford chose to "instantly deposit" the funds, which resulted in a deposit of \$4,383.25 after deducting an "Instant" deposit fee of \$66.75.⁶⁹



73. Crawford then sent Garland the message, "Done."⁷⁰

⁶⁸ Demonstrative 4H.

⁶⁹ Demonstrative 4H.

⁷⁰ Demonstrative 4H.

74. Records from Cash App and PFCU confirm that the transaction did take place as shown in the screenshots sent by Crawford.

75. More specifically, according to Cash App records, at approximately the same time Crawford and Garland exchanged messages, there was a \$4,450 “Cash Out” from Garland’s Cash App account to an account number ending in 8384.⁷¹

Attempted Transfers					
Date	Status	Amount	Source	Action	Target
2021-10-13 21:09:13 UTC	COMPLETE	USD 4,450.00	CASH_BALANCE	Cash Out	[REDACTED] 8384

76. According to PFCU records, a debit card with the same account number ending 8384 was issued for a PFCU account belonging to Lashawnda Crawford.⁷²

77. PFCU records also reflect that, on October 13, Crawford’s account received a Cash App deposit of \$4,385.25 (equal to the original \$4,450 minus the fee of \$66.75, as shown in the screenshots Crawford sent Garland on that date).⁷³

Post Date	Effective Date	Description	Amount	Balance
...				
10/13		Deposit	4383.25	4918.13
		Cash App*Cash Out Visa Direct CA		
	Date 10/13/21	[REDACTED] 4829		

VI. GARLAND SOLD SOME CONTRABAND TO OTHER INMATES AND PROVIDED CONTRABAND FOR OTHER CO-CONSPIRATOR INMATES TO SELL WITHIN THE PRISON.

78. In furtherance of the enterprise and conspiracy, Garland provided contraband narcotics to at least one other inmate co-conspirator at RCF for the purpose of having that inmate sell the narcotics to other inmates. During the relevant period, Garland demanded payment from

⁷¹ Demonstrative 4I; Ex. 140; Ex. 141; Ex. 142; Ex. 143.

⁷² Ex. 140; Ex. 141; Ex. 142.

⁷³ Ex. 143.

that co-conspirator inmate and directed that inmate to make narcotics sales on certain other cell blocks. As Garland explained to that inmate, Garland’s purpose in obtaining these funds was so that Garland could purchase guns for other associates outside the prison. The evidence supporting that conclusion includes the following:

79. According to prison records, Barry Jones (a/k/a “Big Slime”) was an inmate at RCF during the relevant period.⁷⁴

80. On October 3, 2021, Garland and B. Jones exchanged the following text messages, in which Garland demanded that B. Jones sell narcotics in a cell block to repay him for providing contraband.⁷⁵

Timestamp	From	Message
10/3/2021 12:35:58 AM(UTC+0)	Garland	N when u gone b ready for me u on a bigger block than me n I did twice wat u sent off this block alone the nigga on d block done twice
10/3/2021 12:47:45 AM(UTC+0)	B. Jones	Bro niggas don’t got paper like that
10/3/2021 12:47:55 AM(UTC+0)	B. Jones	Give me 2days
10/3/2021 12:48:00 AM(UTC+0)	Garland	U not fuckin wit f they need it bad

81. Two days later, on October 5, 2021, Garland and B. Jones exchanged text messages in which Garland asked when he would receive B. Jones’s payment (a “deposit”), B. Jones asked Garland for additional narcotics, and Garland indicated that he has narcotics available and would have more if B. Jones waits.⁷⁶

Timestamp	From	Message
10/5/2021 10:53:52 PM(UTC+0)	Garland	Yo slime
10/5/2021 10:54:08 PM(UTC+0)	B. Jones	Yo bro
10/5/2021 10:54:50 PM(UTC+0)	B. Jones	U good
10/5/2021 10:54:59 PM(UTC+0)	Garland	Yea I’m waitin on u

⁷⁴ Ex. 69; Demonstrative 7A-7B; Blair 04/07/2022 N.T. at 50-51.

⁷⁵ Demonstrative 7C.

⁷⁶ Demonstrative 7D.

10/5/2021 10:55:04 PM(UTC+0)	B. Jones	7:30
10/5/2021 10:55:09 PM(UTC+0)	B. Jones	I'm on it
10/5/2021 10:55:13 PM(UTC+0)	Garland	To make a deposit
10/5/2021 10:55:15 PM(UTC+0)	B. Jones	And I got 9 for u
10/5/2021 10:55:20 PM(UTC+0)	Garland	Liked "And I got 9 for u"
10/5/2021 10:55:32 PM(UTC+0)	Garland	N wait till tomorrow night ima have sum more for u
10/5/2021 10:55:46 PM(UTC+0)	B. Jones	So u not dropping tonight
10/5/2021 10:55:48 PM(UTC+0)	B. Jones	Da gas
10/5/2021 10:56:05 PM(UTC+0)	Garland	I can but if u wait I can make it better n give u another load
10/5/2021 10:56:24 PM(UTC+0)	B. Jones	I can bend da blokk I need some smoke

82. A short time later, Garland invited B. Jones to obtain narcotics that he had forgotten about, and B. Jones provided partial payment to Garland for his outstanding debt.⁷⁷

Timestamp	From	Message
10/5/2021 11:08:22 PM(UTC+0)	Garland	Come get the loud I got 1 ball for u n Gball
10/5/2021 11:08:33 PM(UTC+0)	Garland	The load bout to land
10/5/2021 11:08:39 PM(UTC+0)	Garland	Liked "So I can get something tonight"
10/5/2021 11:08:51 PM(UTC+0)	Garland	I been had this shit put up I forgot n all
10/5/2021 11:16:48 PM(UTC+0)	B. Jones	Ok bro love u
10/5/2021 11:37:14 PM(UTC+0)	Garland	Send the app so I can send it where it need to b
10/5/2021 11:39:16 PM(UTC+0)	B. Jones	My bad I forgot
10/5/2021 11:40:24 PM(UTC+0)	B. Jones	Sent it
10/5/2021 11:40:32 PM(UTC+0)	Garland	Liked "Sent it"
10/5/2021 11:40:59 PM(UTC+0)	Garland	Ok we at \$400
10/5/2021 11:41:03 PM(UTC+0)	B. Jones	Faxts

83. On October 8, 2021, Garland requests further payment from B. Jones and explains that their business relationship is not working.⁷⁸

⁷⁷ Demonstrative 7E.

⁷⁸ Demonstrative 7F.

Timestamp	From	Message
10/8/2021 1:51:34 PM(UTC+0)	Garland	When u gone b ready for a deposit kin I'm not liking hw u conductin ya bizness cuz lk hw e block flow lk I could have been cashed out alrdy now it's two week u still ain't cash me out for the first bomb then I just have u gas n I still ain't get a deposit like this ain't workin
10/8/2021 1:52:42 PM(UTC+0)	Garland	N it's not about nb burning nb but my money better in my account he is it that I send u cuz u say u got the legs u got 250 to serve but yet u not done 25 balls n lk niggas got money everybody ain't broke
10/8/2021 2:00:40 PM(UTC+0)	B. Jones	We been lokked in at night bro and they had me working during da day cert been up here da last two days not today

84. In response, B. Jones stated that Garland lacks patience. Garland replied that “[i]t’s not that I have no patience”; that “my right hand just got smoked two days ago n my man got hit tf up yesterday” and that “has [nothing] to do with bizness”; and that E Block should be providing “at least \$500 a day”.⁷⁹

⁷⁹ Demonstrative 7F.

Timestamp	From	Message
10/8/2021 2:03:07 PM(UTC+0)	B. Jones	U jus have NO patience brody

...

10/8/2021 2:54:32 PM(UTC+0)	Garland	It's not that I have no patience lk hw long it takes yo make moves no disrespect but what do ya folks gettin hit have to do wit this paper my right hand just got smoked two days ago n my man got hit tf up yesterday but none of that has to do wit bizness I don't let nothin come in between makin this money when it's up I stop all that shit n focus on the opp but everything else is bout this money kin it's no way that e block not pullin in at least \$500 a day I had the block to the dick b4 so I kno WSUp so I'm just lost u on that block 24/7 so just cuz u can't get out at night not makin Sense when u got a jack n niggas kno WSUp cuz ALL my moves come off my jack
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85. Continuing the conversation, B. Jones explained that other inmates “don’t got money like u think.” In response, Garland stated that B. Jones should “stop tryna get me to send all this work” and Garland explained that, “At the end of the day kin my niggas need more guns so I need money to do that that shit up out there.” Based on testimony and context, the term “duce” refers to contraband narcotics.⁸⁰

Timestamp	From	Message
10/8/2021 2:55:57 PM(UTC+0)	B. Jones	Bro these niggas don't got money like u think
10/8/2021 2:57:00 PM(UTC+0)	Garland	Then stop tryna get me to send all this work kin I can sit on my own work I got plays dwn here to make n I can't cuz I put shit in ya hands
10/8/2021 2:57:19 PM(UTC+0)	B. Jones	Yea they love that Duce
10/8/2021 2:57:31 PM(UTC+0)	Garland	U just tried to get me to send u more Duce now I sayin niggas ain't got the money to cash out this shit ain't free

⁸⁰ Demonstrative 7K.

. . .

10/8/2021 2:58:13 PM(UTC+0)	Garland	At the end of the day kin my niggas need more guns so I need money to do that that shit up out there
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VII. GARLAND USED PROFITS FROM CONTRABAND SALES TO BUY AN AR-15 FOR HIS CO-CONSPIRATORS.

86. On October 6, 2021, at 5:15 PM Eastern (9:15 PM UTC), Tyree Warthen was murdered on the 5500 block of Elliott Street in Southwest Philadelphia, close to an address on 55th Street associated with Garland’s Cash App account.⁸¹

87. On October 7, at 12:48 AM Eastern (4:48 AM UTC), Garland uses his phone to do web searches for “man shot on Elliot st in philadelphia today” and similar phrases, and Garland visited a CBS Philly webpage titled, “Man Shot in Head in Critical Condition in Kingsessing, Philadelphia Police Say.”⁸²

88. In the evening of October 7 (Eastern), Garland had his first communication with the person(s) who would sell him an AR-15 firearm later that month. At 8:25 PM Eastern that evening (12:25 AM UTC on October 8), Garland has a 13-minute call with Person 3.⁸³ At 8:44 PM Eastern (12:44 AM UTC), Garland receives a text message from Person 4 (a/k/a “Dully 20st”).⁸⁴ Before that evening, Garland’s phone does not reflect any messages or phone calls with Person 3 or Person 4.

⁸¹ Demonstrative 7J, 4I.

⁸² Demonstrative 7G-7I.

⁸³ Demonstrative 10A (entry 341).

⁸⁴ Ex. 73 (Dully 20st Report at 1).

89. As described above, on October 8, 2021, at 10:54 AM Eastern (2:54 PM UTC), Garland and B. Jones exchanged messages about money that B. Jones owes Garland, and Garland explained his “my right hand just got smoked two days ago n my man got hit tf up yesterday,” and “[a]t the end of the day kin my niggas need more guns so I need money to do that shit up out there.”⁸⁵

90. About 10 days later, Garland used funds from his Cash App account to purchase an AR-style firearm from Person 4. Garland arranged to have Person 4 give that weapon to Crawford, and Garland told Crawford to give it to Person 2.⁸⁶ At 7:06 AM UTC, Garland sent text messages to Person 2 explaining that Garland would acquire an AR-style firearm for Person 2 and others, and that Garland would arrange to have that firearm delivered to Crawford for her to give to Person 2.⁸⁷

Timestamp	From	Message
10/17/2021 7:06:03 AM(UTC+0)	Garland	I’m gettin us a ar tomorrow hmu when u get up
10/17/2021 7:19:43 AM(UTC+0)	Person 2	Rd say no more
10/17/2021 7:27:33 AM(UTC+0)	Garland	We gone need shells
...		
10/17/2021 7:36:29 AM(UTC+0)	Garland	So the move is ima have him take it to sis crib n y’all go get it from her only reason I’m not have him drop on y’all cUz folk active n real scary n I don’t want nuffin to go left or seem left

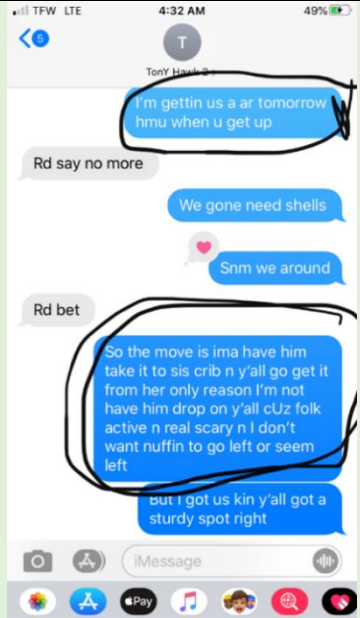
⁸⁵ Demonstrative 7K.

⁸⁶ Demonstrative 5A, 6D-6E.

⁸⁷ Demonstrative 5A-5C; Ex. 83 (TonY Hawk 2 Report at 6).

10/17/2021 7:37:10 AM(UTC+0)	Garland	But I got us kin y'all got a sturdy spot right
10/17/2021 7:38:17 AM(UTC+0)	Person 2	Rd say no more just let me kno I'll go scoop it and yeah I got a sturdy spot you kno we got dew crib on lock

91. Garland sent texts to Crawford that looped her into the plan, by texting Crawford a screenshot of Garland's conversation with Person 2. Garland further asked Crawford to purchase .223 caliber rounds, or "shells," for the firearm and explained that he would be acquiring another AR-style firearm to stay with Crawford:⁸⁸

Timestamp	From	Message
10/17/2021 8:34:44 AM(UTC+0)	Garland	
10/17/2021 10:21:50 PM(UTC+0)	Garland	If u got to the shop get 223s
10/17/2021 10:22:38 PM(UTC+0)	Crawford	Liked an image
10/17/2021 10:23:35 PM(UTC+0)	Crawford	So it's not staying here ?
10/17/2021 10:23:38 PM(UTC+0)	Crawford	Liked "If u got to the shop get 223s"
10/17/2021 10:23:52 PM(UTC+0)	Garland	Not this one I'm getting another one

⁸⁸ Demonstrative 5D, 8G.

92. Consistent with his statements to Crawford, Garland also explained to others that he was planning to purchase two AR-15s.⁸⁹

Timestamp	From	Message
10/17/2021 5:02:09 PM(UTC+0)	Garland	I'm buyin two ar pistols today
10/17/2021 5:02:35 PM(UTC+0)	Garland	Youngin beefing gotta make sure we gettin up fuck playin
10/17/2021 5:03:00 PM(UTC+0)	B. Jones	No question

93. Around the same time, Garland arranged for Person 4 to deliver the firearm to Crawford, and Garland and Crawford made payments totaling \$1,500 for that firearm.

94. On October 17, 2021, at 2:33 AM Eastern (6:33 AM UTC), Person 4 and Garland had a FaceTime call that lasts 57 minutes and 57 seconds.⁹⁰ During that call, at 3:06 AM Eastern (7:06 AM UTC), Person 4 sent Garland a video of a dark figure with muzzle flashes and sounds from a firearm being discharged. Det. Krawczyk testified that the flashes and sounds from the video appeared to depict someone shooting an assault rifle or AR.⁹¹

95. Then, on October 17 at 10:46 PM Eastern (October 18 at 2:46 AM UTC), Person 4 and Garland had another Face Time call lasting 34 minutes, 5 seconds.⁹² On October 18, at 12:17 AM Eastern (4:17 AM UTC), they have an additional FaceTime call lasting 19 minutes 28 seconds.⁹³

⁸⁹ Demonstrative 7M.

⁹⁰ Demonstrative 10A (entry 99).

⁹¹ Demonstrative 5C; Krawczyk 04/22/2022 N.T. at 92.

⁹² Demonstrative 10A (entry 45).

⁹³ Demonstrative 10A (entry 40).

96. Later that day, Garland and Person 4 exchanged the following messages, arranging for Crawford and Person 4 to meet up:⁹⁴

Timestamp	From	Message
10/18/2021 7:03:22 PM(UTC+0)	Person 4	Yo gang whenever sis ready
10/18/2021 7:29:57 PM(UTC+0)	Garland	
10/18/2021 7:30:14 PM(UTC+0)	Garland	She said txt first so she kno it's u
10/18/2021 7:36:50 PM(UTC+0)	Garland	Her name Mira
10/18/2021 8:56:23 PM(UTC+0)	Person 4	Ard
10/18/2021 9:19:13 PM(UTC+0)	Garland	Liked "Ard"
10/18/2021 9:19:23 PM(UTC+0)	Garland	Yall talk yet

97. Shortly after this last text message, on October 18, 2021, at 5:19 PM Eastern (9:19 PM UTC), Garland and Person 4 had a phone conversation lasting 3 minutes, 10 seconds.⁹⁵ While that conversation is ongoing, Garland and Crawford exchanged the following text messages:⁹⁶

Timestamp	From	Message
10/18/2021 9:19:36 PM(UTC+0)	Crawford	He got CashApp right
10/18/2021 9:20:23 PM(UTC+0)	Garland	Yea n he said u actin like u don't kno wat he talkin bout
10/18/2021 9:20:33 PM(UTC+0)	Garland	Liked "He got CashApp right "

98. A few hours later, Garland had additional phone conversations with Person 4 lasting 37 minutes.⁹⁷

⁹⁴ Demonstrative 5E.

⁹⁵ Demonstrative 10A (entry 24).

⁹⁶ Demonstrative 5F.

⁹⁷ Demonstrative 10A (entries 8, 9, 13, 14).

99. At around the same times as Garland's phone conversations with Person 4

Garland and Crawford also exchanged the following text messages:⁹⁸

Timestamp	From	Message
10/19/2021 1:09:41 AM(UTC+0)	Garland	Do u have a estimate of when to be ready cuz this crazy ass nigga just ridin around wit it 😂😂
10/19/2021 2:55:14 AM(UTC+0)	Garland	Yea that's my man
10/19/2021 2:55:39 AM(UTC+0)	Crawford	Liked "Yea that's my man"
10/19/2021 2:56:00 AM(UTC+0)	Crawford	Liked an audio message
10/19/2021 3:15:31 AM(UTC+0)	Garland	Bring a jacket out wit u
10/19/2021 3:15:41 AM(UTC+0)	Crawford	Ok
10/19/2021 3:16:14 AM(UTC+0)	Crawford	Is he close I'm j shower
10/19/2021 3:16:16 AM(UTC+0)	Garland	He bout pull up
10/19/2021 3:16:22 AM(UTC+0)	Crawford	Rd
10/19/2021 3:16:38 AM(UTC+0)	Crawford	Get dressed
10/19/2021 3:16:52 AM(UTC+0)	Garland	He outside in white bmw

100. On October 19, between 3:21 and 3:28 AM UTC, Cash App records reflect that an account with alias "Choco Bunni" attempted to transfer \$1,500 to an account belonging to Person 5, but succeeded only in transferring \$100. The alias "Choco Bunni" is similar to the alias "Chocolate Bunni" and "BunniBabi," used by Crawford in connection with her Cash App account.⁹⁹

101. Cash App records reflect that, at 3:28 AM UTC, Garland's account transferred a total of \$1,400 to an account belonging to Person 5, using a subject line that references the nickname used for Person 4 in Garland's phone ("Dul").¹⁰⁰

⁹⁸ Demonstrative 5F.



⁹⁹ Demonstrative 4G.

¹⁰⁰ Demonstrative 6D.

102. Cash App records further reflect that, minutes later, at 3:33-3:34 AM UTC, the account belonging to Person 5 sent a total of \$1,500 to the Cash App account associated with the phone number for Person 4.¹⁰¹

103. In sum, Person 5 accepted \$1,500 from Garland and his co-conspirators, and then sent that same amount to Person 4, as Person 4 was delivering an AR-style firearm to Crawford.

104. Approximately ten minutes after those Cash App transfers, Crawford confirmed the successful delivery of the firearm by texting to Garland the following two images:¹⁰²

Timestamp	From	Message
10/19/2021 3:37:53 AM(UTC+0)	Crawford	
10/19/2021 3:40:45 AM(UTC+0)	Crawford	

105. The photo depicts an AR-style firearm held in a hand with distinctive finger nails and polish. Those fingernails and polish appear consistent with Crawford’s hand, as shown in

¹⁰¹ Demonstrative 6D-6E.

¹⁰² Demonstrative 5F.

another photograph Crawford had sent to Garland a little more than three days earlier. In particular, on October 15, between 8:13 and 8:16 PM UTC, Crawford sent Garland the following photos of her hand holding an Apple shopping bag and Apple products, as she was shopping for items Garland had requested.¹⁰³



106. Several hours after Crawford received the AR-style firearm, Garland sent Person 2—the intended end-recipient for the firearm—a screenshot of an AR-15 compatible drum magazine and a message asking who could purchase the item.¹⁰⁴

Timestamp	From	Message
10/19/2021 7:37:07 AM(UTC+0)	Garland	<p>The screenshot shows a product page for a KCI AR-15 Magazine .223/5.56 NATO 100 Round Drum. The page includes the website name 'cheapershooter.com', navigation links for 'SHOP CLEARANCE', 'SHOP NEW ARRIVALS', and 'SHOP ALL DEPARTMENTS'. The product is listed under 'Home / Parts & Accessories'. The product name is 'KCI AR-15 Magazine .223/5.56 NATO 100 Round Drum'. Below the name are star ratings and links for 'Read 7 Reviews', '46 Questions', '52 Answers', and '6 Buyer Comments or Write a Review'. A large image of the magazine is shown, with a red 'SET REWARDS' button on the right. At the bottom, there is a green 'ADD TO CART' button and a price tag of '\$134.97'.</p>

¹⁰³ Demonstrative 1G, 5F.

¹⁰⁴ Demonstrative 1G.

107. Det. Krawczyk testified that, to the best of his information, that AR-style firearm has not yet been recovered.¹⁰⁵

RECOMMENDATION OF CHARGES

108. We, the members of the Thirty-First County Investigating Grand Jury, having heard evidence and testimony in relation to the enterprise and conspiracy detailed herein, conclude that a prima facie case exists to bring the following charges against the following persons. Accordingly, we recommend that the District Attorney or his designee bring the following charges:

AS AGAINST KHALIF WORKMAN

Conspiracy (18 Pa. C.S. § 903) (F1)

Corrupt Organizations (associated with an enterprise and conducted and participated in the enterprise's affairs through a pattern of racketeering activity, including bribery, possession with intent to deliver a controlled substance, and dealing in the proceeds of unlawful activity) (18 Pa. C.S. § 911(b)(3)) (F1)

Corrupt Organizations (conspired to violate §§ 911(b)(1) and (b)(3)) (18 Pa. C.S. § 911(b)(4)) (F1)

Bribery in Official and Political Matters (18 Pa. C.S. § 4701(a)) (F3)

Contraband – Furnishing Controlled Substance to Confined Person Prohibited (18 Pa. C.S. § 5123(a)) (F2)

Contraband – Furnishing Telecommunication Devices to Inmate Prohibited (18 Pa. C.S. § 5123(c.1)) (M1)

Manufacture, Delivery, or Possession with Intent to Deliver a Controlled Substance (35 P.S. § 780-113(a)(30)) (F)

Knowing or Intentional Possession of a Controlled Substance (35 P.S. § 780-113(a)(16)) (M)

¹⁰⁵ Krawczyk 4/22/2022 N.T. at 101.

Criminal Use of a Communications Facility (18 Pa. C.S. § 7512) (F3)

Dealing in the Proceeds of Unlawful Activity (conducted financial transaction transferring funds from Khalif Workman's Cash App to PFCU account ending 8733 with knowledge that such funds represent proceeds of unlawful activity and with intent to promote the carrying on of the unlawful activity) (18 Pa. C.S. § 5111(a)(1)) (F1)

Obstructing the Administration of Law or Other Governmental Function (18 Pa. C.S. § 5101) (M2)

AS AGAINST BARRY GARLAND

Conspiracy (18 Pa. C.S. § 903) (F1)

Corrupt Organizations (established and operated an enterprise using income derived from a pattern of racketeering activity, including bribery, possession with intent to deliver a controlled substance, and dealing in the proceeds of unlawful activities) (18 Pa. C.S. § 911(b)(1)) (F1)

Corrupt Organizations (associated with an enterprise and conducted and participated in the enterprise's affairs through a pattern of racketeering activity including bribery, possession with intent to deliver a controlled substance, and dealing in the proceeds of unlawful activities) (18 Pa. C.S. § 911(b)(3)) (F1)

Corrupt Organizations (conspired to violate §§ 911(b)(1) and (b)(3)) (18 Pa. C.S. § 911(b)(4)) (F1)

Bribery in Official and Political Matters (18 Pa. C.S. § 4701(a)) (F3)

Contraband – Furnishing Controlled Substance to Confined Person Prohibited (18 Pa. C.S. § 5123(a)) (F2)

Contraband – Furnishing Telecommunication Devices to Inmate Prohibited (18 Pa. C.S. § 5123(c.1)) (M1)

Contraband – Possession of Controlled Substance by Inmate Prohibited (18 Pa. C.S. § 5123(a.2)) (F2)

Contraband – Possession of Telecommunication Devices by Inmate Prohibited (18 Pa. C.S. § 5123(c.2)) (M1)

Manufacture, Delivery, or Possession with Intent to Deliver a Controlled Substance (35 P.S. § 780-113(a)(30)) (F)

Knowing or Intentional Possession of a Controlled Substance (35 P.S. § 780-113(a)(16)) (M)

Criminal Use of a Communications Facility (18 Pa. C.S. § 7512) (F3)

Dealing in the Proceeds of Unlawful Activity (conducted financial transaction transferring funds to the Cash App account of Khalif Workman with knowledge that such funds represent proceeds of unlawful activity and with intent to promote the carrying on of the unlawful activity) (18 Pa. C.S. § 5111(a)(1)) (F1)

Dealing in the Proceeds of Unlawful Activity (conducted financial transaction transferring funds from Barry Garland's Cash App account to PFCU account ending in 8384 with knowledge that such funds represent proceeds of unlawful activity and with intent to conceal or disguise the nature, location, source, ownership or control of the proceeds of unlawful activity) (18 Pa. C.S. § 5111(a)(2)) (F1)

Persons Not to Possess, Use, Manufacture, Control, Sell or Transfer Firearms (exercised control over and transferred AR-style firearm while prohibited from doing so because of a prior disqualifying conviction for robbery) (18 Pa. C.S. § 6105) (F2)

AS AGAINST LASHAWNDA CRAWFORD

Conspiracy (18 Pa. C.S. § 903) (F1)

Corrupt Organizations (associated with an enterprise and conducted and participated in the enterprise's affairs through a pattern of racketeering activity including bribery, possession with intent to deliver a controlled substance, and dealing in the proceeds of unlawful activities) (18 Pa. C.S. § 911(b)(3)) (F1)

Corrupt Organizations (conspired to violate §§ 911(b)(1) and (b)(3)) (18 Pa. C.S. § 911(b)(4)) (F1)

Bribery in Official and Political Matters (18 Pa. C.S. § 4701(a)) (F3)

Contraband – Furnishing Controlled Substance to Confined Person Prohibited (18 Pa. C.S. § 5123(a)) (F2)

Contraband – Furnishing Telecommunication Devices to Inmate Prohibited (18 Pa. C.S. § 5123(c.1)) (M1)

Manufacture, Delivery, or Possession with Intent to Deliver a Controlled Substance (35 P.S. § 780-113(a)(30)) (F)

Knowing or Intentional Possession of a Controlled Substance (35 P.S. § 780-113(a)(16)) (M)

Criminal Use of a Communications Facility (18 Pa. C.S. § 7512) (F3)

Dealing in the Proceeds of Unlawful Activity (conducted financial transaction transferring funds to the Cash App account of Khalif Workman with knowledge that such funds represent proceeds of unlawful activity and with intent to promote the carrying on of the unlawful activity) (18 Pa. C.S. § 5111(a)(1)) (F1)

Dealing in the Proceeds of Unlawful Activity (conducted financial transaction transferring funds from Barry Garland's Cash App account to PFCU account ending in 8384 with knowledge that such funds represent proceeds of unlawful activity and with intent to conceal or disguise the nature, location, source, ownership or control of the proceeds of unlawful activity) (18 Pa. C.S. § 5111(a)(2)) (F1)

AS AGAINST BARRY JONES

Conspiracy (18 Pa. C.S. § 903) (F1)

Corrupt Organizations (conspired to violate §§ 911(b)(1) and (b)(3)) (18 Pa. C.S. § 911(b)(4)) (F1)

Contraband – Furnishing Controlled Substance to Confined Person Prohibited (18 Pa. C.S. § 5123(a)) (F2)

Contraband – Possession of Controlled Substance by Inmate Prohibited (18 Pa. C.S. § 5123(a.2)) (F2)

Contraband – Possession of Telecommunication Devices by Inmate Prohibited (18 Pa. C.S. § 5123(c.2)) (M1)

Manufacture, Delivery, or Possession with Intent to Deliver a Controlled Substance (35 P.S. § 780-113(a)(30)) (F)

Knowing or Intentional Possession of a Controlled Substance (35 P.S. § 780-113(a)(16)) (M)

Criminal Use of a Communications Facility (18 Pa. C.S. § 7512) (F3)

Dealing in the Proceeds of Unlawful Activity (conducted financial transaction transferring funds to Cash App account as directed by Barry Garland with knowledge that such funds represent proceeds of unlawful activity and with intent to promote the carrying on of the unlawful activity) (18 Pa. C.S. § 5111(a)(1)) (F1)

AS AGAINST ASHLINE GARCIA CRUZ

Conspiracy (18 Pa. C.S. § 903) (F1)

Contraband – Furnishing Controlled Substance to Confined Person (18 Pa. C.S. § 5123(a)) (F2)

Manufacture, Delivery, or Possession with Intent to Deliver a Controlled Substance (35 P.S. § 780-113(a)(30)) (F)

Knowing or Intentional Possession of a Controlled Substance (35 P.S. § 780-113(a)(16)) (M)

Criminal Use of a Communications Facility (18 Pa. C.S. § 7512) (F3)