

1 3. Based on my review of an FBI criminal history report for
2 defendant Deandre Wilson, defendant Wilson was convicted in Illinois
3 state court of misdemeanor Possession of a Firearm on or about
4 October 1, 2010. I also know that Wilson was charged with a 2014
5 murder in Illinois state court and was found not guilty in or around
6 July 2023.

7 4. Based on my review of an FBI criminal history report for
8 defendant Asa Houston, defendant Houston was convicted in Illinois
9 state court of at least the following: (i) Armed Carjacking on or
10 about March 3, 2010; (ii) Aggravated Battery with Great Bodily Harm
11 on or about July 13, 2011; and (iii) Felon in Possession of a Firearm
12 on or about March 5, 2008, May 8, 2017, and August 22, 2023.

13 5. Based on my review of certified conviction records for
14 [REDACTED], [REDACTED] was convicted in [REDACTED] state of [REDACTED]
15 [REDACTED] on or about [REDACTED].

16 6. Based on my review of an FBI criminal history report for
17 Only the Family ("OTF") associate [REDACTED]
18 [REDACTED] was convicted in Illinois state court of Aggravated Battery
19 with a Firearm on or about [REDACTED].

20 7. Based on my review of an FBI criminal history report for
21 OTF associate [REDACTED] and open-source
22 research, [REDACTED] was arrested in or around [REDACTED] and charged
23 with, among other things, murder, kidnapping, and armed robbery.

24 8. Based on conversations with other law enforcement agents
25 with knowledge of Chicago-based gangs and open-source research, I
26 know that Marcus Smart aka "Muwop" is a member of the O-Block street
27 gang and associate of defendant Durk Banks and OTF, including having
28 appeared in at least two of Banks' music videos. On or about January

1 17, 2024, Smart was convicted by jury of racketeering offenses,
2 including murder, in the Northern District of Illinois.

3 9. Attached as **Exhibit A** is a true and correct copy of an
4 audio message seized from a phone belonging to [REDACTED], and sent to [REDACTED]
5 from a number associated with OTF associate [REDACTED]

6 [REDACTED]

7 10. Based on my review of an FBI 302 documenting an interview
8 with [REDACTED] on [REDACTED], I know that [REDACTED] stated the
9 following:

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 11. [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]

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1 12. Attached as **Exhibit B (Under Seal)** is a true and correct
2 copy of a report from the Bureau of Prisons documenting defendant
3 Banks' possession of a contraband Apple Watch. As noted in Exhibit
4 A, defendant Banks attempted to damage and/or destroy the device when
5 he was caught with it. Based on the FBI's investigation, including
6 data provided by Apple, I know that the serial number of the watch
7 seized from Banks' person shows that the device was associated with
8 the Verizon cellular network, was purchased on May 26, 2025, and was
9 activated the next day. Thus, the device permitted defendant Banks,
10 and possibly others, to have an unknown number of unmonitored
11 communications.

12 13. Based on my review of an FBI report from on or about March
13 6, 2025 and recordings of four voicemails left on a Central District
14 of California United States Magistrate Judge's chambers line on or
15 about February 22, 2025, I know that the individual states, among
16 other things, that defendant Banks and Wilson were innocent and that
17 "if they get life . . . I'm gonna burn this motherfucker down . . .
18 burn it to the ground . . . it's not a game bitch."

19 14. Based on my involvement in the investigation and review of
20 relevant reports, I know that in April 2025, AUSA Yanniello received
21 a phone call on his USAO desk line from an unknown male caller who
22 began making threats to AUSA Yanniello, which caused AUSA Yanniello
23 to begin recording the call. During the call, the unknown male
24 caller stated "free Durk, or we gonna shoot that motherfucker up."
25 AUSA Yanniello responded "shoot who up," to which the caller said
26 "shit, your ass."

27 I declare under penalty of perjury under the laws of the United
28 States of America that the foregoing is true and correct and that

1 this declaration is executed at Los Angeles, California, on October
2 6, 2025.

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4 _____
5 JARRON FARMBY
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EXHIBIT A

[Audio file lodged
manually]

EXHIBIT B

[UNDER SEAL]