

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION
LEXINGTON**

UNITED STATES OF AMERICA

PLAINTIFF

v.

AFFIDAVIT

**KEITH L. STALLWORTH
PAIGE V. GRAVES**

DEFENDANTS

I, Thomas Clements, being duly sworn, do hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a duly sworn Task Force Officer with the United States Drug Enforcement Administration (DEA), having been assigned in that capacity since January 2020. I am also currently a detective with the Lexington Police Department (LPD) in the Narcotics Enforcement Unit. I have been employed as an officer with the LPD since August 2012. During my tenure with the LPD and DEA, I have participated in investigations involving violations of federal narcotic laws.

2. I have also attended training schools and have been instructed in many aspects of narcotic investigations and am familiar with the narcotic laws promulgated under Title 21 of the United States Code and federal money laundering laws promulgated under Title 18 of the United States Code. I have initiated or participated in surveillance, the operation and debriefing of numerous drug dealers, drug users, and informants, performed both physical and electronic

surveillance, executed search warrants, analyzed records documenting the purchase and distribution of illegal drugs, and the concealment of illegal narcotics profits.

3. This affidavit is based upon my personal knowledge and upon information reported to me by other local law enforcement officers, specifically members of the Kentucky State Police (KSP) East Interdiction Team, during the course of their official duties. The information contained in this affidavit is not a complete account of everything known to me about this case. Rather, it contains the facts that I believe are sufficient to support a finding of probable cause.

4. The investigation to date indicates that there is probable cause to believe that on or about August 10, 2023, in Fayette County, in the Eastern District of Kentucky, Keith L. Stallworth and Paige V. Graves did knowingly and intentionally possess with intent to distribute mixtures or substances containing a detectable amount of methamphetamine and fentanyl, both Schedule II controlled substances, in violation of 21 U.S.C. § 841. The following facts support the finding of probable cause.

PROBABLE CAUSE

5. On August 9, 2023, DEA Task Force Officer Travis Steward applied for and received a state of Kentucky search warrant authorizing investigators to conduct a search of [REDACTED] Stone Avenue Apartment [REDACTED] Lexington, Kentucky, a 2023 Hyundai Santa Fe with Florida license [REDACTED], and the person of Keith L. Stallworth. This warrant was signed by Fayette County Kentucky District Court Judge Melissa Moore Murphy at 2:26 pm.

6. On August 10, 2023, members of the DEA LRO, assisted by members of the KSP East Interdiction Team, established surveillance of [REDACTED] Stone Avenue Apartment [REDACTED] Lexington,

Kentucky. At approximately 11:50 am, surveillance team members observed Stallworth exit the residence and enter the Hyundai Santa Fe which was parked in front of the residence. After entering the driver's seat, Stallworth departed the area quickly in the vehicle. Due to investigator's knowledge that Stallworth frequently carried a firearm and had previously fled from law enforcement, investigators did not attempt to detain him at that time for fear of placing innocent bystanders in jeopardy. Surveillance was not maintained of Stallworth in his vehicle at that time.

7. At approximately 2:10 pm, surveillance team members observed Stallworth traveling in the Hyundai Santa Fe east on High Street and turn into the parking lot of his Stone Avenue residence. At that time, KSP East Interdiction Team and DEA LRO members established active containment of Stallworth's Hyundai Santa Fe with the emergency lights of their respective vehicles activated. Stallworth proceeded to place his vehicle in reverse and ram the KSP vehicle immediately to his rear. After striking the vehicle multiple times, members of the DEA LRO were ultimately able to remove Stallworth from the vehicle and place him into custody without further incident. On his person, law enforcement located and seized a Palmetto State Armory 5.7 caliber handgun, approximately 143 gross grams of suspected fentanyl, and approximately 54 gross grams of suspected cocaine. That same day at the LRO, investigators utilized a reliable law enforcement field testing device to examine the substances which subsequently tested positive for the presence of fentanyl and cocaine. In the passenger compartment of the vehicle, investigators located and seized approximately 479.2 gross grams of suspected methamphetamine. That same day at the LRO, investigators utilized a reliable and past proven law enforcement field testing device to examine the substance which subsequently tested positive for the presence of methamphetamine. Additionally in the passenger compartment of

the vehicle, investigators located and seized approximately 50.3 gross grams of suspected fentanyl. After securing the vehicle and Stallworth, agents and officers made entry into the Stone Avenue address where Paige V. Graves was located and subsequently arrested on an outstanding state of Kentucky warrant. A search of the residence yielded additional suspected controlled substance as well as multiple firearms, ammunition, and magazines. Stallworth and Graves are both prohibited from possessing firearms due to prior felony convictions in the state of Kentucky. Stallworth has previously been convicted of the felony offense of Possession of a Handgun by a Convicted Felon by final judgment of the Mercer County Kentucky Circuit Court in 2014 and Trafficking in a Controlled Substance by final judgment of the Boyle County Kentucky Circuit Court in 2005. Graves has previously been convicted of the felony offense of Unlawful Access to a Computer by final judgment of the Boyle County Kentucky Circuit Court in 2018 for which she was on parole at the time of the commission of the offenses outlined in this document.

9. In the rear of the apartment near the back door, investigators observed an area which served as a drug processing laboratory. In that area investigators located and seized a scale, cutting agents, a heat sealer, and a kilogram press. Affiant is aware that these tools are frequently utilized to repackage controlled substances with adulterants and cutting agents to maximize profits of sales based on weight. Investigators also located 182.6 gross grams of suspected methamphetamine in a box located underneath the processing station. At the DEA LRO, investigators again utilized a reliable and past proven law enforcement field testing device to examine the substance which subsequently tested positive for the presence of methamphetamine. A suspected fake identification card purported to be from the state of Georgia was located in this area with Stallworth's picture on the identification card..

10. In the master bedroom of the home, investigators located and seized additional quantities of controlled substances to include suspected fentanyl pills, marijuana, cocaine approximately 148 gross grams of cocaine, approximately 56 gross grams of crack cocaine and approximately 173.4 gross grams of methamphetamine. In this room investigators also seized two handguns, multiple rounds of ammunition, and three magazines associated for use with long rifles. This room further contained multiple vehicle registrations in the name of Keith Stallworth and a seven day notice to pay rent at [REDACTED] Stone Avenue addressed to Stallworth and Graves. A handgun was located in a dresser drawer containing women's underwear with the other handgun being located in an adjacent drawer, which contained mail matter for Keith Stallworth.

11. The controlled substances seized from Stallworth and seized from the search of his residence are strongly indicative of distribution and trafficking as opposed to mere personal use. The amounts seized were well above that which a typical drug user would ingest. Further, the processing laboratory contained in the shared residence of Stallworth and Graves for controlled substances additionally reflects that the controlled substances were intended for repackaging and resale to third parties.

12. Based on the facts stated above, your affiant is aware that Keith L. Stallworth and Paige V. Graves are distributors of controlled substances in the Eastern District of Kentucky. The amounts of suspected controlled substances seized from Stallworth's vehicle and the shared residence are not consistent with that for personal use. Rather, the amounts located by investigators reflect quantities consistent with a mid-level retailer in the central Kentucky area. The presence of the suspected controlled substances in both the common areas of the apartment and shared bedroom of Stallworth and Graves make both parties responsible for their constructive and actual possession. Evidence contained within this affidavit supports that on

August 10, 2023, Keith L. Stallworth and Paige V. Graves both possessed with intent to distribute both methamphetamine and fentanyl, Schedule II Controlled Substances, in violation of 21 U.S.C. § 841.

CONCLUSION

13. I believe that the facts set forth above support that there is probable cause to believe that on or about August 10, 2023, in Fayette County, in the Eastern District of Kentucky, Keith L. Stallworth and Paige V. Graves did knowingly and intentionally possess with intent to distribute mixtures or substances containing a detectable amount of methamphetamine and fentanyl, both Schedule II controlled substances, in violation of 21 U.S.C. § 841. I declare under the penalty of perjury that the above-statement is true and correct to the best of my knowledge, information, and belief.

/s/ Thomas Clements
Thomas Clements, Task Force Officer
Drug Enforcement Administration

Attested to by applicant per FRCP 4.1 by reliable electronic means on this 11th day of August, 2023.


MATTHEW A. STINNETT

U.S. MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
for the
Eastern District of Kentucky

United States of America
v.
KEITH LAMONT STALLWORTH
DOB [redacted], In Custody - Fayette County

Case No.
5:23-mj-5291

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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 August 10, 2023 in the county of Fayette in the
Eastern District of Kentucky, the defendant(s) violated:

Code Section Title 21 U.S.C. Section 841(a)(1)
Offense Description KNowing and Intentional Possession With Intent to Distribute a mixture or
substance containing a detectable amount of Methamphetamine and a
detectable amount of Fentanyl, both Schedule II Controlled Substances.

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

/s/ Thomas Clements

Complainant's signature

Thomas Clements, Task Force Agent - DEA

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Criminal. P. 4.1 transmitted by reliable
electronic means (e-mail).

Date: 08/11/2023

Matthew A. Stinnett
Judge's signature

City and state: Lexington, KY

Matthew A. Stinnett, United States Magistrate Judge

Printed name and title