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AFFIDAVIT

I am a former Federal drug informant. I was arrested in August, 1987 and cooperated with the DEA until March 31, 1988.

Detective Robert German of the Benton Police Department and Lieutenant Robert Holiday of the Benton Police Department and I had a deal to sell drugs, marijuana, cocaine or LSD and they would protect me from arrest. The agreement began in September, 1987. For protection, I paid their partying expenses and began to make regular payments of \$300 to \$2,500 on a weekly or bi-weekly basis. I furnished the drugs for their use and their friends' use. It grew into a relationship in October, 1987 of selling drugs out of the Benton Property Room when I went to the Benton Police Department. German and Sergeant James Smith, the property officer of the Benton Police Department, brought me what they said was all of the marijuana in the Benton Property Room, some old plants and six to eight pounds. While I was there, the Chief of Police, Jim Berry, saw all of the dope emptied on the table. He said "What's going on?" Then he said, "I know", and left. German and Smith followed him out and all three came back in. Berry said to me, "You are going to put all the competition out of business. You'll have all the dope business." He left. I knew at the time that German and Holiday had something on Berry having to do with the thefts covered up with a fire. The present Chief of Police, Rick Elmendorff, also told me that German had taken him to Julie's Place in June, 1988 and told Elmendorff that Berry had covered up something. German, Smith and I went through all the dope. German and Holiday planned to take the dope, use the bad dope to set people up and sell the good stuff. German and Holiday delivered the drugs to me the following day when Lisa Collins was present.

All this occurred while I was an FBI informant and German was on the Drug Task Force. The FBI wanted to bust Perry Dugan and that was my only assignment. During this period of time, I was still hauling marijuana out of Mexico and German was aware of it, as was Gibbs of the State Police. The dope from Mexico was mine to sell and I could keep the money.

I went to Colorado to see Perry in 1987. Then, Perry brought me seventeen pounds of dope. I asked German what to do with it, that I owed Perry \$20,000. German said, "Sell it. I didn't see it." The FBI funded a trip for me and German to go see Perry. I paid Perry \$8,000 on the last debt. He gave me twenty-five more pounds on credit, which German and I brought back to Arkansas. German called Gibbs from Colorado and told Gibbs that he didn't see anything but hash. I told German that I owed this guy \$30,000 and asked him what I was going to do. He said, "We will have to go talk to Little Brother (Holiday)." I got back and sold some dope, which was delivered to customers by me and German in his police car and personal car. I then took Perry \$20,000 the next week. He showed me two thousand pounds of pot; and ten pounds of hash. The transactions with Perry became a weekly affair. Ninety percent of the drugs were sold out of German's police car.

German and Holiday told me they planned to control fifty percent of the attorneys in Benton. How or why, I am not sure.

I had been dealing drugs to David Zimmerman in five to eight pound quantities since May, 1987. In November, 1987, David Zimmerman got fired. I bought one thousand hits of LSD from him. I began dealing drugs to Zimmerman regularly.

German and I set up Perry Young because he owed us \$1,200 for drugs. German came to my house with cocaine and methamphetamine from the evidence locker out of Shawn Bear. We took out half an ounce of methamphetamine. He brought a crime lab report with him and showed me the purity. I took forty percent of the methamphetamine, which was fifty-seven percent pure and diluted it to twelve percent methamphetamine and sold the difference. We busted Perry with the twelve percent and sold the rest. We diluted the ninety-seven percent cocaine to five percent and put it back in the evidence locker and sold the pure stuff. We added water to the marijuana to give it weight and delivered it to Perry and busted him.

David Zimmerman bought some of the crystal, cocaine and methamphetamine. He knew where it came from because he saw the evidence bags. He began working for me on a salary of \$750 per week. We put the stash house in his name, which was an apartment in Benton

that German and I had picked out. I instructed David Zimmerman to make all the deals in Saline County since we had protection there. He had a beeper that German and I used to beep him on when he should not have made a deal, if German learned from his information at the Task Force or from the State Police that there was a bust going to be made on Zimmerman. A code on Zimmerman's beeper meant stop doing whatever he was doing. David Zimmerman saw all the evidence bags at the stash house and took them to his trailer for his protection. I made him bring them back. They were stolen from me in a burglary, except for a half dozen which I turned over to the FBI by giving them to Joe Hardage, Patty Watson and Ron Kelly. The FBI must have turned them all over to Rick Elmendorff because I saw them in Elmendorff's hands at the Grand Jury investigating the deaths of those two children in Benton run over by the railroad train.

Kirk Lane and Robert German were roommates before I started dealing with German. I saw Kirk Lane outside the apartment once after they ceased being roommates.

David Zimmerman and I went to Florida to pay Chuck Dugan, Perry's brother, \$25,000 on one occasion.

German and Holiday told me that the Benton Police Department had a SWAT Team which practices with automatic weapons and dynamite. Kirk Lane told me that he was a member. The members have cobra heads tattooed on their upper arms. Lisa Collins, my girlfriend, was raped by a group of men including German, Holiday and Kirk Lane, which we believe to be the Benton Police Department SWAT Team. Holiday once showed me a book which I believe was entitled "How to Get Even with Your Neighbors". The book described ways to aggravate your neighbors without them finding out, such as throwing bricks through their windows, telephone hang-up calls, flattening tires, throwing nails in their yard, ordering shipments C.O.D. to them, putting varnish in their gas tanks, etc.

On December 31, 1987, David Zimmerman was at my house. I gave him the keys to Lisa's car. He smoked a joint and snorted some crystal. At about 8:30 or 9:00 a.m., his wife told me that he'd had a wreck. Officer James Smith told me that someone got killed, that there were

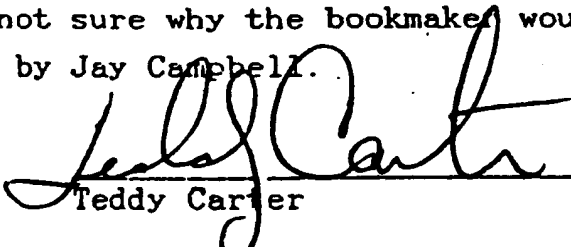
drugs in the car and my boy was in a lot of trouble. David Zimmerman had a machine gun in the car with him at the time. German took me to retrieve it. Attached is a photocopy of the Arkansas Democrat's reporting of the accident and the victim's obituary.

On March 13, 1988, I told FBI Agent Hardage about the rapes of my girlfriend. On March 18 or so, I gave the FBI the evidence bags. On March 23, Kirk Lane and Robert German were at the Little Rock Hilton looking for me, according to Joe Hardage of the FBI. On March 25, 1988, FBI Agent Hardage gave me \$500 to leave town because I was being hunted by Lane and German.

I was followed by several vehicles in March and April. I got several tag numbers and they came back, "Not on File", meaning that it is a police vehicle.

On January 13 or 14, David Zimmerman told me that there was a crank lab protected by Kirk Lane on Dixon Road in Little Rock. He told me where it was and he knows exactly where it is. It was a lab moved there from Paron. I told it to German on January 17. He said he told the FBI, but didn't. I told the FBI myself a week later.

I do not know Jay Campbell except that a bookmaker, Terry Johnson, about four years ago asked me if I wanted to go see a drug bust. I went with him to GiGi's on the Old Benton Highway and saw a drug bust by Jay Campbell. I am not sure why the bookmaker would have advance notice about the drug raid by Jay Campbell.



Teddy Carter

STATE OF ARKANSAS)
SS)
COUNTY OF PULASKI)

Subscribed and sworn to before me this _____ day of _____, 1988.

Notary Public

My Commission Expires:
