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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
VALENTINO JOHNSON, : Mag. No. 09-3695  
KAREEM MIDDLETON, and :  
a/k/a "RAYMOND" :  
ERNIE DOYLE :  
a/k/a "DIZ" :

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. From at least in or about June 2009 through on or about September 11, 2009, in Essex County, in the District of New Jersey and elsewhere, defendants VALENTINO JOHNSON, KAREEM MIDDLETON, and ERNIE DOYLE did:

knowingly and intentionally conspire and agree with each other, and with others, to distribute and to possess with the intent to distribute 5 kilograms or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

I further state that I am a Special Agent of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

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Michael Riley, Special Agent  
United States Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

September 11, 2009, at Newark, New Jersey

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## ATTACHMENT A

I, Michael Riley, a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), following an investigation, am aware of the following facts pertinent to this charge:

1. In or about June 2009, defendant ERNIE DOYLE approached an ICE confidential informant ("CI") and asked the CI in substance and in part whether the CI knew of anyone who had significant quantities of narcotics. DOYLE stated in substance and in part that he had associates who would pose as law enforcement agents and rob narcotics dealers. In coordination with law enforcement, the CI told DOYLE in substance and in part that the CI was aware of an impending shipment of narcotics to Newark, New Jersey.

2. On or about August 18, 2009, the CI met with DOYLE and defendant VALENTINO JOHNSON. During the meeting, JOHNSON identified himself as a law enforcement officer, showed the CI law enforcement credentials, passed a radio frequency transmission device over the CI's person, and made the CI take the battery out of the CI's mobile telephone. JOHNSON, DOYLE, and the CI then discussed an impending narcotics shipment to Newark, New Jersey.

4. On September 7, 2009, in coordination with law enforcement, the CI met with JOHNSON and defendant KAREEM MIDDLETON. During that meeting, the CI, JOHNSON and MIDDLETON discussed in substance and in part that a shipment of between 40 and 60 kilograms of cocaine would be arriving at a garage in Newark, New Jersey in the near future, that the narcotics would be hidden in a compartment within the sleeper cab of a truck, the possibility of using bolt cutters to gain entry to the garage, that JOHNSON could sell ten kilograms of cocaine per week, and that kilograms of cocaine were selling for between \$26,000 and \$30,000 per kilogram.

5. On September 10, 2009 at approximately 10:30 p.m., the CI, JOHNSON, MIDDLETON, and DOYLE drove in a silver Nissan Maxima to the Newark, New Jersey garage. Law enforcement observed JOHNSON exit the Maxima, squeeze through a gap in the gate located near the garage, approach the garage, and inspect the lock on the side door to the garage. JOHNSON returned to the car and he, the CI, MIDDLETON, and DOYLE drove away.

6. On September 11, 2009, at approximately 3:50 a.m., law enforcement observed JOHNSON and MIDDLETON drive up to the gate located near the garage in a silver Nissan Maxima driven by JOHNSON. Law enforcement observed a silver Lexus driven by an uncharged individual (the "UI") with DOYLE in the passenger seat park nearby. Law enforcement observed MIDDLETON exit the Maxima, approach the gate, cut a padlock on the gate with bolt cutters, and get back into the car. Law enforcement observed JOHNSON and MIDDLETON drive through the gate and park the Maxima in an alley adjacent to the garage. Law enforcement observed JOHNSON walk back to the gate, close it, and lock it using a different padlock. Law enforcement observed JOHNSON and MIDDLETON approach the side

door to the garage. Law enforcement observed MIDDLETON use the bolt cutters to cut a padlock on the side door, and JOHNSON and MIDDLETON enter the garage.

7. Once in the garage, law enforcement observed MIDDLETON open the door to the truck and enter its sleeper cab. MIDDLETON opened a compartment within the sleeper cab and JOHNSON and MIDDLETON removed 50 kilograms of sham cocaine that was within the compartment.

8. Law enforcement approached the gate to the garage. Law enforcement observed JOHNSON and MIDDLETON approach the interior side door to the garage, see law enforcement at the gate, and go back inside the garage. Law enforcement observed JOHNSON remove his government issued firearm from its holster and place it next to the side door of the garage. JOHNSON and MIDDLETON exited the garage and were arrested. Law enforcement also took DOYLE and the UI into custody.

10. A search of the garage revealed JOHNSON's government issued firearm. A search of JOHNSON revealed a padlock and a receipt reflecting the purchase of two padlocks on September 11, 2009 at 12:45 a.m. on his person.