

I further state that I am a Special Agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI), and that this complaint is based on the following facts:

SEE ATTACHMENT B

/s/ Corey Letts

Corey Letts, Special Agent
U.S. Department of Homeland Security

Special Agent Letts attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1

4/26/2024

Date

at

District of New Jersey
County and State

HONORABLE ANDRÉ M. ESPINOSA, III
UNITED STATES MAGISTRATE JUDGE

André M. Espinosa
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Fentanyl, Heroin, and Cocaine)

From in or around April 2023 through in or around April 2024, in Essex County, in the District of New Jersey and elsewhere, defendants

JERRY ROSS,
a/k/a “Molly,”
JOSEPH ROSS,
a/k/a “Rock,”
LUIS DELVALLE,
a/k/a “Lou”
PERNELL WHITE,
a/k/a “P-Hood”,
a/k/a “Lil P,”
JAQUAY BELL,
a/k/a “Mega,”
ANDRE GADDY,
a/k/a “Drizzy,”
JACOB DOUGLAS,
a/k/a “Jol,”
TARELL STROND,
a/k/a “Gucci,” and
TAYEIRE THOMAS
a/k/a “Fat Ted”

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute a 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

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

ATTACHMENT B

I, Corey Letts, am a Special Agent with U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, video footage, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

THE WEST 3RD STREET DTO

1. The defendants are members of a drug trafficking organization that operates an open-air narcotics market primarily in and around the area of West 3rd Street in Plainfield, New Jersey ("West 3rd Street"). Members of the conspiracy include Jerry Ross, a/k/a "Molly" ("Je. ROSS"), Joseph Ross, a/k/a "Rock" ("Jo. ROSS"), Luis Delvalle, a/k/a "Lou" ("DELVALLE"), Pernell White, a/k/a "P-Hood" or "Lil P" ("WHITE"), Jaquay Bell, a/k/a "Mega" ("BELL"), Andre Gaddy, a/k/a "Drizzy" ("GADDY"), Jacob Douglas, a/k/a "Jol" ("DOUGLAS"), Tarell Strond, a/k/a "Gucci" ("STROND"), and Tayeire Thomas, a/k/a "Fat Ted" ("THOMAS") (collectively, the "Defendants").

2. During the timeframe relevant to the conspiracy charged in this Complaint, law enforcement extensively surveilled the area of West 3rd Street through physical and fixed surveillance; used confidential informants and undercover law enforcement officers to purchase narcotics, including substances that tested positive for the presence of fentanyl, heroin, and cocaine; reviewed arrests and drug seizures made by local law enforcement in the area of West 3rd Street; and analyzed telephone records demonstrating interactions between the co-conspirators, among other lawful means of investigation. The investigation revealed that the drug trafficking organization operating in the area of West 3rd Street (the "West 3rd Street DTO" or "DTO") is affiliated with, and the Defendants are members and/or associates of, Sex, Money, Murder, a subset of the Bloods criminal street gang.

3. The Defendants conspired and agreed with each other and others to distribute large quantities of fentanyl, heroin, and cocaine in the area of West 3rd Street. Since in or around April 2023, through physical and fixed surveillance, law enforcement has observed members of the West 3rd Street DTO collectively engage in hundreds of suspected hand-to-hand narcotics transactions. As described in more detail below, during the course of this investigation, law enforcement has used confidential informants, as well as

undercover law enforcement officers, to purchase fentanyl, heroin and cocaine from members of the DTO on numerous occasions. Through those controlled purchases, law enforcement seized substances that tested positive for the presence of fentanyl, heroin, and cocaine.

4. The Defendants worked together to distribute the fentanyl, heroin, and cocaine to their customers. Evidence indicating collaboration among the co-conspirators includes, for example: telephone records showing ongoing and numerous contacts between co-conspirators; physical interactions between co-conspirators; and seizures of recurring stamps branding the fentanyl and heroin, indicating that members of the DTO obtained their narcotics from a common source of supply.

5. The evidence described below demonstrates that the Defendants acted in concert to operate in and around West 3rd Street and that the drug distribution was coordinated among the conspirators.

LAW ENFORCEMENT SEIZURES OF NARCOTICS INVOLVING THE WEST 3RD STREET DTO

April 22, 2023 Seizure of “Cotton Candy” Fentanyl

6. On or about April 22, 2023, law enforcement observed WHITE engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-1, in the area of West 3rd Street. Following the transaction, Buyer-1 was arrested by law enforcement and found to be in possession of approximately one glassine envelope containing fentanyl¹ stamped “Cotton Candy.”

January 8, 2024 Seizure of Cocaine

7. On or about January 8, 2024, law enforcement observed DOUGLAS engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-2, in the area of West 3rd Street. Following the transaction, Buyer-2 was arrested by law enforcement and found to be in possession of approximately one knotted clear plastic bag containing a quantity of cocaine.

March 8, 2024 Seizure of “Pound Cake” Fentanyl

8. On or about March 8, 2024, law enforcement observed WHITE engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-3, in the area of West 3rd Street. Following the transaction, Buyer-

¹ Unless otherwise noted, the substances referenced in this Complaint have been confirmed as fentanyl, heroin and/or cocaine through laboratory testing.

3 was arrested by law enforcement and found to be in possession of approximately 10 glassine envelopes containing fentanyl stamped “Pound Cake.”

March 8, 2024 Seizure of “La Kush Cake” Fentanyl and Cocaine

9. On or about March 8, 2024, law enforcement observed GADDY engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-4 and Buyer-5, in the area of West 3rd Street. Following the transactions, Buyer-4 and Buyer-5 were arrested by law enforcement. Buyer-4 was found to be in possession of approximately one knotted clear plastic bag containing a quantity of cocaine. Buyer-5 was found to be in possession of approximately two glassine envelopes containing a mixture of fentanyl and heroin stamped “La Kush Cake.”

March 13, 2024 Seizure of “Pound Cake” Fentanyl

10. On or about March 13, 2024, law enforcement observed STROND engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-6, in the area of West 3rd Street. Following the transaction, Buyer-6 was arrested by law enforcement and found to be in possession of approximately 10 glassine envelopes containing a mixture of fentanyl and heroin stamped “Pound Cake.”

March 13, 2024 Seizure of Cocaine

11. On or about March 13, 2024, law enforcement observed BELL engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-7, in the area of West 3rd Street. Following the transaction, Buyer-7 was arrested by law enforcement and found to be in possession of approximately two knotted clear plastic bags each containing a quantity of cocaine.

March 27, 2024 Seizure of Cocaine

12. On or about March 27, 2024, law enforcement observed STROND engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-8, in the area of West 3rd Street. Following the transaction, Buyer-8 was arrested by law enforcement and found to be in possession of approximately five knotted clear plastic bags each containing a quantity of cocaine.

April 1, 2024 Seizure of “Chicago Bulls,” “Win for Life,” and “Lemon Pepper” Fentanyl and Cocaine

13. On or about April 1, 2024, law enforcement observed DELVALLE engage in multiple suspected hand-to-hand narcotics transactions, including with Buyer-9 in the area of West 3rd Street. Following the transaction, Buyer-9

was stopped by law enforcement in a motor vehicle and arrested. The motor vehicle was subsequently searched pursuant to a judicially authorized search warrant, and law enforcement recovered approximately 200 glassine envelopes containing a mixture of suspected fentanyl and heroin stamped “Chicago Bulls,” “Win for Life,” and “Lemon Pepper,” as well as approximately 18 grams of suspected cocaine.

CONTROLLED PURCHASES OF FENTANYL, HEROIN AND COCAINE

14. In addition to the seizures described above, between in or around May 2023 and in or around April 2024, law enforcement used confidential informants and undercover law enforcement officers to purchase fentanyl, heroin, and cocaine from multiple members of the DTO. All of these transactions were conducted in the area of West 3rd Street or other locations in New Jersey. Prior to each controlled purchase, law enforcement ensured that the confidential informant making the purchase did not have any unauthorized contraband or currency. Each controlled transaction was monitored by law enforcement through physical or fixed surveillance, and multiple transactions were also audio and video recorded. Some of those purchases are outlined below:

Buy No.	On or about the Week of	Defendant	Substances² Purchased	Stamps Used on Fentanyl/Heroin
1	May 7, 2023	Jo. ROSS	Fentanyl/ Heroin Cocaine	Faragamo
2	Sept. 10, 2023	WHITE	Fentanyl	New High Score
3	Oct. 29, 2023	DELVALLE	Fentanyl/ Heroin	Pound Cake Antibiotic, Jaw Busters
4	Nov. 19, 2023	DELVALLE	Fentanyl/ Heroin	Pound Cake Jaw Busters Cheesecake

² In some cases, additional substances were identified through laboratory testing.

5	Dec. 3, 2023	DELVALLE	Fentanyl/ Heroin	Pound Cake, Cotton Candy Cheesecake
6	Dec. 3, 2023	Jo. ROSS	Cocaine	
7	Dec. 10, 2023	DELVALLE	Fentanyl/ Heroin	Pound Cake Cotton Candy Cheesecake Antibiotics
8	Dec. 17, 2023	DELVALLE	Fentanyl	Pound Cake Cheesecake Antibiotics
9	Dec. 31, 2023	STROND	Fentanyl	Cheesecake
10	Dec. 31, 2023	DOUGLAS STROND	Fentanyl	YSL
11	Jan. 21, 2024	Jo. ROSS STROND	Fentanyl/ Heroin	Money Bag
12	Feb. 4, 2024	GADDY	Cocaine	
13	Feb. 4, 2024	Jo. ROSS	Fentanyl	Kodak Black
14	Feb. 11, 2024	GADDY	Fentanyl and Cocaine	Pound Cake
15	Feb. 11, 2024	BELL Jo. ROSS WHITE	Fentanyl	Kodak Black
16	Mar. 3, 2024	GADDY	Fentanyl/ Heroin Cocaine	Patron
17	Mar. 3, 2024	Je. ROSS WHITE GADDY	Fentanyl/ Heroin	Patron
18	Mar. 24, 2024	Jo. ROSS	Fentanyl Cocaine	Pound Cake Chicago Bulls Oprah
19	Mar. 31, 2024	Jo. ROSS DELVALLE	Fentanyl	Chicago Bulls Oprah
20	Apr. 7, 2024	GADDY	Fentanyl/ Heroin Cocaine	Codeine Dreams
21	Apr. 7, 2024	Jo. ROSS DELVALLE	Fentanyl	Pound Cake

22	Apr. 7, 2024	BELL WHITE DOUGLAS	Fentanyl/ Heroin	Toxic
23	Apr. 14, 2024	BELL WHITE DOUGLAS	Fentanyl/ Heroin	Game Over
24	Apr. 21, 2024	Jo. ROSS DELVALLE	Fentanyl/ Heroin ³	Pound Cake

SURVEILLANCE

15. During the timeframe of the conspiracy, law enforcement heavily surveilled the area of West 3rd Street. Over the course of the investigation, law enforcement obtained hundreds of hours of video footage depicting members of the West 3rd Street DTO engaging in narcotics transactions. The footage captured, among other evidence, dozens of narcotics transactions involving the Defendants, daily interactions between members of the conspiracy; a constant stream of narcotics buyers approaching the area for brief interactions; and co-conspirators holding, passing, and counting drug proceeds amongst themselves.

16. Based on the narcotics seized during the course of the investigation and the hundreds of hand-to-hand narcotics transactions captured on video footage, the investigation revealed that the co-conspirators distributed well over 40 grams of fentanyl and large quantities of heroin and cocaine during the conspiracy period.

PHONE CONNECTIONS

17. Law enforcement has identified phone numbers for various members of the West 3rd Street DTO through a number of investigative techniques. Records for those phone numbers show hundreds of calls between nearly all of the Defendants during the conspiracy period. For example, between in and around April 2023 through in and around April 2024:

- Je. ROSS and DELVALLE were in contact approximately 143 times.
- Je. ROSS and Jo. ROSS were in contact approximately 225 times.
- Je. ROSS and WHITE were in contact approximately 68 times.
- Je. ROSS and STROND were in contact approximately 279 times.
- Je. ROSS and DOUGLAS were in contact approximately 36 times.
- Je. ROSS and THOMAS were in contact approximately 28 times.
- Jo. ROSS and WHITE were in contact approximately 249 times.
- Jo. ROSS and STROND were in contact approximately 434 times.

³ Laboratory testing remains pending.

- Jo. ROSS and BELL were in contact approximately 451 times.
- Jo. ROSS and GADDY were in contact approximately 21 times.
- Jo. ROSS and THOMAS were in contact approximately 85 times.
- DELVALLE and Jo. ROSS were in contact approximately 51 times.
- DELVALLE and STROND were in contact approximately 343 times.
- DELVALLE and THOMAS were in contact approximately 33 times.
- WHITE and DOUGLAS were in contact approximately 684 times.
- WHITE and DELVALLE were in contact approximately 30 times.
- WHITE and THOMAS were in contact approximately 175 times.
- WHITE and BELL were in contact approximately 258 times.
- WHITE and GADDY were in contact approximately 45 times.