

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America
v.

Jeffrey Jones a/k/a "Jazzy"
Defendant

Case No. 12-5503 (KMW)

CRIMINAL COMPLAINT

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 of _____ in the county of _____ in the _____ District of
New Jersey, the defendant violated _____ 21 U. S. C. § 846
, an offense described as follows:

SEE ATTACHMENT A

This criminal complaint is based on these facts:

SEE ATTACHMENT B

Continued on the attached sheet.

Benjamin Walls
Complainant's signature

Benjamin Walls, HIDTA Task Force Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/23/2012

Karen M. Williams
Judge's signature

City and state: Camden, New Jersey

Honorable Judge Karen M. Williams
Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

BY: Howard Wiener
HOWARD WIENER
Assistant United States Attorney

DATE: 1-23-12

ATTACHMENT A

From in or about 1990, to on or about September 27, 2007, in Camden County, in the District of New Jersey, and elsewhere, the defendant

JEFFREY JONES a/k/a "Jazzy"

did knowingly and intentionally conspire and agree with Mack Jones a/k/a "Bear," Rashaad Smith a/k/a "Tyke," Raymond Morales, Torey Bussie a/k/a "Tiz," A.F., M.Y., A.P., S.C., and with others to distribute and to possess with intent to distribute more than 150 kilograms of a mixture and substance containing a detectable amount of cocaine, and more than 150 kilograms of a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, Schedule II controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

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

ATTACHMENT B

Affiant's identity and qualifications

I, Benjamin Walls, Jr., am currently employed as a detective by the Camden Police Department, and have been so employed for over 17 years. Since 2002, I have been assigned as a Task Force Officer to the High Intensity Drug Trafficking Area ("HIDTA") Task Force in Camden. The HIDTA Task Force is a federal task force comprised of law enforcement officers from numerous federal, state, and local law enforcement agencies. Those officers work together on drug-trafficking and related investigations in Camden and its vicinity. During the course of my employment, and particularly while I have been a Task Force Officer, I have participated in hundreds of such investigations. I have utilized, and am familiar with, a number of methods and techniques of investigation, including but not limited to wiretaps, search warrants, defendant and witness interviews, use of confidential informants, and undercover meetings and drug transactions. Based on my training and experience, I have become very familiar with the methods and means of drug trafficking in and around the city of Camden.

Summary of the conspiracy

1. I have probable cause to believe that JEFFREY JONES, a/k/a "Jazzy," "Jazz," "J," "Jazz-O," "Big Homey," "Beej," "Raheem Langston," and "Marcus Anderson" (hereinafter referred to as "JEFFREY JONES") participated in a drug-trafficking conspiracy that began in or about 1990 and continued until at least September 27, 2007. Through the years of this conspiracy, JEFFREY JONES began as a lower-level distributor, in concert with others, and then became a large-scale buyer and seller of cocaine. During the conspiracy, JEFFREY JONES either owned and operated or was otherwise associated with a number of open air drug markets, popularly called "drug sets," in the city of Camden. Usually, when he was just associated with drug sets, as opposed to owning and operating them, he supplied the owners/operators of those sets with bulk cocaine. Sometimes, he supplied manpower to operate those sets. During lengthy periods during the conspiracy, he conspired with a number of people, some of whom have decided to cooperate with law enforcement. Those cooperating witnesses will be referred to as CW-1 through CW-7. All CWs referred to in this affidavit have advised law enforcement that they were drug dealers during most, if not all, of the period of the alleged conspiracy. In addition, all those CWs have been arrested and convicted multiple times for offenses involving and relating to drug trafficking. Despite the fact that JEFFREY JONES was incarcerated at times during the conspiracy, including the period 1999-2003, he continued to participate in the conspiracy throughout its 17 year duration. To make it easier to understand the facts and to minimize confusion, I will: (a) break down the evidence into three

time periods: 1990-1997, 1998-2003, and 2004-2007; (b) use headings to identify a CW the first time I mention that CW in this affidavit; and (c) list common nicknames that will be used repeatedly in this affidavit, as follows:

MACK JONES	"Bear"
RASHAD SMITH	"Tyke"
TOREY BUSSIE	"Tiz"

2. This affidavit is based on (a) my personal knowledge, including any investigation I have conducted, (b) the personal knowledge of other law enforcement officers, (c) court and other records, as specified herein, and (d) interviews of law enforcement personnel and civilian witnesses. Since this affidavit is being made for the limited purpose of establishing probable cause to believe that a crime has been committed and that JEFFREY JONES committed it, I have not included all the facts and evidence known to me that are relevant to this crime and defendant. All conversations and statements of CWs related herein are set forth in substance and in part. Also, consistent with the policy of the U.S. Attorney's Office, initials rather than full names will be used to refer to people who have not been charged with a crime.¹ Unless otherwise noted herein, when a certain set of initials is used, it always refers to the same person, e.g., whenever "S.C." is mentioned, it is always the same person. When I refer to conversations that occurred between and among various coconspirators, I always relate the substance of those conversations and not the exact words spoken. All sums of money referred to in this affidavit are approximate and in the form of U.S. currency, unless otherwise noted. Finally, all locations referred to in this affidavit are in Camden, New Jersey, unless otherwise noted.

1990-1997

CW-1

3. CW-1 began cooperating with law enforcement in 2003, several months after he was arrested and charged with conspiracy to possess 30 kilograms of cocaine. He ultimately pled to charges including a drug-trafficking conspiracy and aiding and abetting multiple drug-related homicides. Although he faced life imprisonment, a federal judge reduced his sentence to 21 years for his extensive cooperation, which led to the convictions of over 50 people, including the convictions of

¹ The only exception is Torey Bussie a/k/a "Tiz." He was killed in January 1999 and was a central figure in the charged conspiracy, both before and after his death. Furthermore, there was extensive testimony about him in two drug/murder trials in recent years (United States v. Jevon Lewis, Mack Jones, and Ahmed Judge and United States v. Juan Rivera-Velez).

over 20 people in federal district court for drug-trafficking. He testified, and was cross-examined, at length in two federal drug and murder trials at which all four defendants were convicted and received life sentences. He advised law enforcement in substance and in part of the following information about JEFFREY JONES and others.

4. Beginning in or about 1990, CW-1 met a man named Torey Bussie a/k/a "Tiz" when they were incarcerated together as juveniles. In or about 1990, CW-1 was released from prison and in or about 1991, he met JEFFREY JONES through Tiz. Tiz and JEFFREY JONES were cousins. Previously, CW-1 knew "Zeke," who was JEFFREY JONES's father. Tiz was selling crack cocaine at his drug set on 33rd Street (near Harrison). That set was in operation from approximately 1990 through at least 1997. The individuals associated with the operation of that set included JEFFREY JONES, Mack Jones a/k/a "Bear," Melvin Brown a/k/a "Rice," Stephen Lindsey a/k/a "Crush," S.C., and Joe Rosario a/k/a "Farfito."² In or about 1990-92, most of these people still were juveniles, except for Lindsey, who was a little older.
5. During 1990-97, CW-1 regularly supplied Tiz with kilograms of cocaine. In the beginning, CW-1 distributed to Tiz about one kilogram every 2-3 weeks; later it increased to about five kilograms every week or two. CW-1 often visited Tiz's house. While there, and waiting for Tiz to obtain the cash needed to purchase the cocaine from CW-1, CW-1 would see JEFFREY JONES and/or Bear. CW-1 would hand the kilograms to Tiz and saw him in turn hand them to JEFFREY JONES, Bear, and others. CW-1 also saw JEFFREY JONES and others hand money to Tiz. CW-1 recalled that on one occasion, when he was sitting in a car with Tiz, he saw JEFFREY JONES getting into the car, hand about \$8,000 in cash to Tiz, and then leave. Tiz told CW-1 on that occasion to make sure he counted the money, because JEFFREY JONES did not always have the amounts of money he claimed he had.
6. In or about 1995-96, Tiz advised CW-1 that not only was he buying wholesale quantities of cocaine, for distribution as retail quantities of drugs at a drug set, but he also was starting to distribute wholesale quantities to other drug dealers. At the time, Tiz and his people were operating a major drug set known as "The Mailbox," which was located behind a KFC near 19th and Carman Streets (East Camden). Throughout this period, Tiz told CW-1 about this and other sets he was operating, supplying with drugs, or planned to open, including a set at 8th

² Years later, in or about 2007-08, Mack Jones a/k/a "Bear," Rashad Smith a/k/a "Tyke," Stephen Lindsey, Melvin Brown a/k/a "Rice," and Joe Rosario all were convicted of drug trafficking. Bear was convicted at trial and received a life sentence. The others pled guilty. Tyke received a 30 year sentence and Lindsey, Brown, and Rosario each got sentences of at least 10 years.

and Central Streets. CW-1 knew that in the early 1990s and through at least 2002, JEFFREY JONES and Jevon Lewis a/k/a "V" were associated with the 8th and Central Street set.³ CW-1 occasionally saw Tiz drive to that set. One day, Tiz gave CW-1 a tour of his drug sets in Centerville, a neighborhood of Camden; JEFFREY JONES was present at one of those sets. On one occasion, JEFFREY JONES approached CW-1 and asked to buy cocaine directly from CW-1, stating that Tiz was holding him back, *i.e.*, not supplying him with enough cocaine. CW-1 said he would talk to Tiz and tell him that Tiz needed to give JEFFREY JONES more cocaine. CW-1 then spoke to Tiz about this. Tiz responded that JEFFREY JONES owed him money and that was why JEFFREY JONES was trying to get cocaine directly from CW-1. CW-1 advised Tiz that they would continue to deal directly with each other and that CW-1 would not sell cocaine directly to JEFFREY JONES. CW-1 explained that this was in deference to Tiz, because CW-1 had a longstanding business relationship with Tiz.

7. During approximately 1995-96, as Tiz explained to CW-1 and as corroborated by court records, both Tiz and Bear were charged with offenses resulting from the same shooting. Tiz told CW-1 that Tiz and Bear had worked it out so that Tiz would enter jail roughly when Bear left jail, so that they could continue to run their organization effectively. From his previous dealings with Bear and JEFFREY JONES, CW-1 knew they were close, and before Tiz went to jail, Tiz told CW-1 to deal with JEFFREY JONES and Bear while he was incarcerated. One day, CW-1 was at a bar when JEFFREY JONES and Bear approached him and asked when they would be able to get cocaine from CW-1. They also said they wanted to pay off Tiz's debt to CW-1. CW-1 discussed this latter subject with them and they thought Tiz owed CW-1 much less money than he in fact owed CW-1. CW-1 and JEFFREY JONES and Bear then agreed that although Tiz owed CW-1 that amount of money, CW-1 would start fresh with JEFFREY JONES and Bear. JEFFREY JONES & Bear told CW-1 which drug sets they had, that they were working together, and that they wanted to revitalize Tiz's sets. In particular, JEFFREY JONES told CW-1 that he ran Centerville, which CW-1 interpreted to mean the drug sets in that neighborhood. Subsequently, there were times when CW-1 would meet with Bear and JEFFREY JONES in a

³ In or about March 2008, a jury convicted Jevon Lewis of drug-trafficking conspiracy and contract murder and he received a life sentence. This was the same trial in which Bear was convicted. The evidence at trial showed that shortly after Lewis was released from prison in April 2001, he took control of the 8th and Central set and ran it until approximately 2002, when he was arrested and incarcerated. After an eight week trial, the jury convicted Lewis, Bear, and a third defendant of all charges after about a day of jury deliberations. Also, earlier in time, in or about 1994, Lewis and others were charged with a drive-by drug-related shooting/murder. Lewis went to trial, was convicted of aggravated manslaughter, and served a prison sentence from approximately 1995 to April 2001.

vehicle, and JEFFREY JONES would pull out cash and give it directly to CW-1. At other times, CW-1 understood that when Bear gave him money to buy cocaine, it was for cocaine that would be going to both Bear and JEFFREY JONES.

8. In or about 1996-97, when CW-1 was supplying JEFFREY JONES and Bear (while Tiz was in jail), JEFFREY JONES approached CW-1 on one occasion and gave him a tour of his drug sets in Centerville, including the sets in the vicinity of 8th and Central, 9th and Ferry, and Woodland Avenue. On that occasion, he also spoke to CW-1 about buying cocaine directly from CW-1. CW-1 told him that he preferred to deal directly with Bear. CW-1 refused to sell drugs directly to JEFFREY JONES, in deference to JEFFREY JONES's father, Zeke (who previously had asked CW-1 to keep his son away from the drug business), and because CW-1 considered Bear better at business and more reliable.
9. Throughout the period 1990-97, when CW-1 saw JEFFREY JONES, JEFFREY JONES frequently had a firearm on his person. CW-1 knew this either because he would hug JEFFREY JONES and feel a gun or he would see a bulge in JEFFREY JONES's clothing.
10. In or about November 1996, the following event occurred. CW-1 testified about this event during the trial of Bear and Jevon Lewis and during a second drug/murder trial (United States v. Rivera-Velez). CW-1 testified that one night he was at a bar when JEFFREY JONES came up to him. JEFFREY JONES explained that he was having a problem with a competitor of his, who was selling drugs around JEFFREY JONES' area in Centerville. CW-1 told him to "just go around there and shoot him" and offered to help by getting JEFFREY JONES a gun. They left the bar and traveled to the house of Juan Rivera-Velez, who was an enforcer for CW-1. At that location, CW-1 retrieved a high capacity assault rifle. CW-1 reentered the vehicle and they drove to Centerville. In Centerville, JEFFREY JONES spotted his competitor. They parked the vehicle, CW-1 handed JEFFREY JONES the assault rifle and told him to just pull the trigger, and JEFFREY JONES "went out there and shot it up." Then JEFFREY JONES got back into the vehicle and they left the area. CW-1 testified that to his knowledge, as a result of this incident the competitor "never went back around there" and JEFFREY JONES was able to sell more cocaine in that area.
11. CW-1 continued to deal drugs to Tiz and his people, including JEFFREY JONES and Bear, during the entire 1990-97 time frame, up until CW-1's incarceration in or about October 1997 on a drug-trafficking conspiracy conviction.

CW-2

12. CW-2 began cooperating with law enforcement in 2006, shortly after he was arrested along with numerous others for his participation in a drug-trafficking

conspiracy with Tyke, CW-5, CW-6, and others. He ultimately pled guilty to conspiracy. Although he faced life imprisonment as a statutory maximum penalty, and a Sentencing Guidelines range of 30 years to life, a federal judge sentenced him to 10 years imprisonment due to his extensive cooperation. He also testified at the drug/murder trial of Jevon Lewis and Bear. See note 3. He advised law enforcement in substance and in part of the following information about JEFFREY JONES and others.

13. In 1990, CW-2 had just turned 18. He and Tyke were childhood friends and around that time had begun selling crack cocaine together at the Camelot, a bar at Louis and Lansdowne Streets. CW-2 knew about CW-1, who also sold drugs in the Camelot. Later, CW-1 became a major supplier of cocaine to CW-2 and his partners. In or about 1996, CW-2 partnered with Tyke, CW-5, and CW-6 and established a drug set in the middle of the 1200 block of Morton Street, which was approximately three blocks away from the Camelot. In 2006, after they were arrested for, among other things, their activities at that drug set, the press referred to them as the MOB (or "middle of the block") Boys, so for ease of reference I will do the same.⁴ Over the next decade, from approximately 1996 to 2006, the MOB Boys bought wholesale quantities of cocaine from Bear, JEFFREY JONES, CW-1 (both directly and indirectly), L.P., and H.J.
14. CW-2 knew that Tyke and JEFFREY JONES were friends; in the early 1990s, Tyke introduced JEFFREY JONES to CW-2 at the Camelot by saying, in substance, this is Jazzy from Centerville. Tyke told CW-2 that JEFFREY JONES was selling drugs in Centerville, at the 8th & Central set. CW-2 observed this set at that location and saw JEFFREY JONES there. He learned that JEFFREY JONES eventually controlled that set, although CW-2 had no business dealings with him in that period.
15. Later, in or around 1994, CW-2 was at a bar with Tyke and others and CW-2 was introduced to JEFFREY JONES again. On that occasion, CW-2, Tyke, and JEFFREY JONES had a conversation about a number of drug dealers in Camden; this helped CW-2 to get "the lay of the land." Tyke advised that "we" could get cocaine from some of them, and vice versa, referring to Bear, JEFFREY JONES, and Tiz in the Cramer Hill area, and JEFFREY JONES in Centerville, too. CW-2 learned about the drug sets that Bear and Tiz operated, including the sets at 33rd Street (near Harrison), Woodland Avenue, The Mailbox, 9th and Ferry, and 8th and Central. Around that time, CW-2 was unsure what JEFFREY

⁴ Over the next 10 years, from roughly 1996-2006, the MOB Boys did not always include all four men. The core was CW-5, CW-6, and CW-2, but the group often included Tyke or another man named Ismael Zayas (starting in 2001). Zayas later pled guilty to a drug-trafficking conspiracy for his involvement with the MOB Boys and others and received a 164 month sentence.

JONES's position was vis-a-vis Bear and Tiz. CW-2 also learned that another teenager around JEFFREY JONES's age, H.J., was related to Tyke. CW-2 had met Tiz in jail, and later Tiz introduced CW-2 to Bear; Tiz and Bear were selling drugs together in Cramer Hill, a neighborhood in East Camden. CW-2 learned that JEFFREY JONES and Bear were partners; they would pool their funds to buy wholesale quantities, but in general they each operated their own sets.

CW-3

16. CW-3 began cooperating with law enforcement subsequent to his federal arrest on drug-trafficking charges in or about June 2003. He later pled guilty to a federal drug-trafficking conspiracy charge in 2004. Although he faced life imprisonment as a statutory maximum penalty and a U.S. Sentencing Guidelines range of 30 years to life, a federal judge sentenced him to 15 years of imprisonment due to his extensive cooperation. He advised law enforcement in substance and in part of the following information about JEFFREY JONES and others.
17. CW-3 knew JEFFREY JONES and Tiz starting in or about 1991, when they were teenagers. In or about 1993, CW-3 began dealing with Tiz in the drug business. At one point, Tiz owed CW-3 about \$20,000 and the two men discussed that debt. At that time, Tiz advised CW-3 that Tiz and JEFFREY JONES were together in the drug business. Subsequently, JEFFREY JONES gave CW-3 nine ounces of cocaine as partial repayment of Tiz's debt.
18. During approximately 1993-95, CW-3 had intermittent dealings with Tiz's drug associates, including JEFFREY JONES, Bear, and Melvin Brown a/k/a "Rice." CW-3 was buying about one kilogram of cocaine per week from Tiz directly. During this time period, CW-3 would converse with JEFFREY JONES, who told him that he worked for Tiz and broke down kilograms into smaller quantities. CW-3 helped out Tiz's drug associates because some of them were incarcerated at various times. During this time frame, JEFFREY JONES approached CW-3 and asked him to participate in a burglary of Tiz's apartment. CW-3 agreed to participate, because Tiz owed him some money and wasn't paying CW-3. The burglary netted some cash and cocaine.
19. In my experience, I know that in the drug trade in and around Camden, it is customary practice for drug associates to help out each other when one of them is incarcerated as a result of his drug trafficking activities. Such help often includes putting money on someone's book in jail (meaning on his jail account, so he can buy things like toiletries and snacks), providing assistance (often but not limited to monetary assistance) to relatives of the incarcerated person, and helping the latter hire an attorney.

CW-4

20. CW-4 began cooperating with law enforcement subsequent to his federal arrest on drug-trafficking charges in or about May 2006. He later pled guilty to a federal drug-trafficking conspiracy charge in or about September 2007. CW-4's cooperation is extensive and ongoing and he is awaiting sentencing in federal court. He advised law enforcement in substance and in part of the following information about JEFFREY JONES and others.
21. CW-4 met CW-1 in the early 1990s and they became friendly. He knew that CW-1 was in the drug business with "Tony," and that CW-1 and Tony sold wholesale quantities to some big drug dealers at the Camelot. There was a drug set at 9th and Ferry Streets, by a Chinese store. JEFFREY JONES owned and operated that set in approximately 1994-95; CW-4 used to hang out there. In approximately 1995, CW-4, JEFFREY JONES and Tyke were at Tyke's mother's house. CW-4 and Tyke were there first, and then JEFFREY JONES arrived alone. After JEFFREY JONES arrived, Tyke came down the stairs with a suitcase with two guns; they looked new and were in cases. Tyke and JEFFREY JONES each took a gun.
22. CW-4 was released from jail in or about 1996; he was then about 17 years old. Someone fronted him some crack cocaine and he bagged it up and sold it at the Camelot. He knew some of the other dealers at the Camelot: Tyke (CW-4's cousin), R.S. (Tyke's brother), and H.J. (CW-4's cousin). CW-4 later learned from Tyke that JEFFREY JONES was involved at the Camelot with Tyke and other dealers there.
23. In 1997, CW-4 worked at a set at 9th and Van Hook, for M.G. and G.R.. At that time, JEFFREY JONES was running his set at 8th and Central, which was approximately one block away, and was trying to move in on the 9th and Van Hook set because the latter was more successful.

CW-5

24. CW-5 began cooperating with law enforcement in 2006, shortly after he was arrested along with numerous others for his participation in a drug-trafficking conspiracy with Tyke, CW-6, and others. He ultimately pled guilty to conspiracy. Although he faced life imprisonment as a statutory maximum penalty, and a Sentencing Guidelines range of 30 years to life, a federal judge sentenced him to 84 months imprisonment due to his extensive and continuing cooperation in this and other investigations. He also testified at the drug/murder trial of Jevon Lewis and Bear. See note 3. He had grown up with Tyke, CW-2, and CW-6. He advised law enforcement in substance and in part of the following information about JEFFREY JONES and others.

25. CW-5 was released from prison in late 1996, after serving a sentence for drug trafficking. Shortly thereafter, he met with JEFFREY JONES, Bear, and Tyke at the Camelot. JEFFREY JONES and Bear asked Tyke and CW-5 how much money they had, because they wanted to pool all their money together to buy kilograms of cocaine. But Tyke already had told JEFFREY JONES and Bear that he and CW-5 had little money, since they had recently been released from prison. During the trial of Jevon Lewis and Bear, CW-5 testified that when he went to prison in the early 1990s, powder cocaine was the big drug in Camden, but that by the time he came out, crack cocaine had become a big drug, too. As a result, he and the other MOB Boys did not know how to sell crack. So in or about 1996-97, JEFFREY JONES and Bear taught CW-5 and the rest of the MOB Boys how to run a crack drug set, specifically on Morton Street, including how to cook powder cocaine into crack cocaine. JEFFREY JONES and Bear then began supplying them with cocaine. JEFFREY JONES in particular would come by their set a lot, because he had family in the area. CW-2 and CW-6 also testified about this subject--their training and education in running a crack set by JEFFREY JONES and Bear--during the Lewis/Bear trial. In particular, CW-6 advised that JEFFREY JONES and Bear used their set known as The Mailbox to train the MOB Boys in how to operate a crack set.
26. CW-5 learned from JEFFREY JONES during their conversations more about what JEFFREY JONES was doing in the drug business. For example, CW-5 learned that JEFFREY JONES controlled the drug trade in parts of Centerville: (a) JEFFREY JONES told CW-5 that he had the set at 9th and Ferry, that it started on the 900 block of Jefferson, but then moved to 9th & Ferry in or about 1997 after a lookout got killed; (b) JEFFREY JONES sold cocaine at 8th & Central, which at times operated as a "neighborhood set" (meaning that drug dealers could sell there if they were from the neighborhood); and (c) JEFFREY JONES got involved in the set at 9th and Van Hook after the owners, M.G. and G.R. were shot and killed, respectively, in late 1997. In East Camden, Bear and JEFFREY JONES controlled The Mailbox; first Tyke, and then JEFFREY JONES and Bear, told him that this set belonged to JEFFREY JONES and Bear. CW-5 learned that Bear and JEFFREY JONES were partners and that JEFFREY JONES shared in the profits.⁵ The sources of supply for The Mailbox were CW-1 and L.P.; CW-5 facilitated L.P. supplying Bear.

CW-6

27. CW-6 began cooperating with law enforcement in 2006, shortly after he was arrested along with numerous others for his participation in a Drug-trafficking

⁵ According to CW-5, The Mailbox continued to operate, and indeed flourish, up until early 2006, when Bear was arrested by the DEA in the case that led to his conviction and life sentence.

conspiracy with Tyke, CW-2, CW-5, and others. He ultimately pled guilty to conspiracy. Although he faced life imprisonment as a statutory maximum penalty, and a Sentencing Guidelines range of 30 years to life, a federal judge sentenced him to 10 years imprisonment due to his extensive and continuing cooperation in this and other investigations. He also testified at the drug/murder trial of Jevon Lewis and Bear. See note 3. He grew up with Tyke, CW-2, and CW-5. He advised law enforcement in substance and in part of the following information about JEFFREY JONES and others.

28. CW-6 met JEFFREY JONES and Bear when he got out of jail in late 1997. CW-6 advised that when the MOB Boys began buying cocaine from JEFFREY JONES, they would deal with JEFFREY JONES as follows. Early in the day, they would give money to JEFFREY JONES. Later in the day, JEFFREY JONES would meet them at the house of a friend of the MOB Boys and cook the cocaine into crack. The supply from JEFFREY JONES was not steady; sometimes, he would supply them, and sometimes they would supply him (the MOB Boys had other sources of supply). During 1997, JEFFREY JONES and Bear would pool their money so they could buy wholesale quantities. JEFFREY JONES was involved at that time with The Mailbox and the 9th and Ferry Street set. During late 1997 into early 1999, CW-6 would see JEFFREY JONES often, occasionally in possession of a gun.

Key events in the 1990-1997 time frame

29. On or about October 27, 1993, S.C. was arrested for distribution at the 33rd Street set; crack and cash were seized. A month later, he was arrested again at that location for weapons possession. Both times, he gave an alias to police. On or about November 29, 1993, he was arrested for attempted murder (the shooting may have been accidental) at a possible stash house at 33rd Street. He told the arresting officers in substance that he was a drug dealer who sold out there.
30. On or about April 14, 1994, Tiz (Torey Bussie) was arrested for illegal possession of a weapon.
31. On or about June 4, 1994, Tyke (Rashad Smith) was arrested for drug trafficking.
32. On or about January 5, 1995, Jevon Lewis was arrested for illegal possession of a firearm.
33. On or about August 1, 1995, Tiz (Torey Bussie) was arrested and subsequently convicted of the illegal possession of a weapon.
34. On or about August 24, 1997, JEFFREY JONES was arrested leaving an area of Camden known as "Pollocktown" (next to Centerville) with crack cocaine and a

gun. A high speed chase ensued, his vehicle (a motorcycle) was stopped, and JEFFREY JONES ran. During a foot chase by police, JEFFREY JONES discarded a defaced 9 mm semiautomatic handgun. When caught, he was found with more than 200 grams of crack cocaine in his front pocket. Eventually, he pled guilty to the possession with intent to distribute the crack cocaine and was imprisoned from 1999 to 2003.

35. On or about October 1, 1997, S.C. was arrested for possession of two defaced firearms.
36. On or about December 4, 1997, S.C. was observed by law enforcement at a bar (the Cotton Club) with a gun. He fled with two males in a vehicle. The police pursued them, and during a subsequent foot chase, S.C. discarded a gun and approximately 120 bags of crack. He later was arrested for this incident.

1998-2003

CW-7

37. CW-7 began cooperating with law enforcement after his arrest by local law enforcement officers for the illegal possession of a handgun(s) in or about October 2007. He subsequently pled guilty to a federal charge of possession of a firearm by a convicted felon in or about March 2008, as a result of that arrest. Although he faced a statutory maximum penalty of 10 years imprisonment and a U.S. Sentencing Guidelines range of 51-63 months imprisonment, a federal judge sentenced him to six months imprisonment due to his extensive cooperation.
38. In 1998, CW-7 was 12 years old and was selling drugs at the 9th and Van Hook drug set. There was another drug set a block away, at 10th and Van Hook. During that year, CW-7 began working for JEFFREY JONES at both sets. CW-7 advised that JEFFREY JONES commonly employed juveniles as set workers. In my experience, the reasons drug dealers often employ juveniles are that juveniles (a) if and when arrested, face little to no jail time, (b) are typically not used as witnesses against other criminals in prosecutions, and (c) will work for less money than adults. CW-7 got his packs of drugs from C.R. (now deceased) and K.C., who in turn would often meet with JEFFREY JONES. There were three main groups at the 9th Street set; they were headed by JEFFREY JONES, D.B., and D.W. CW-7, C.R., R.B., and A.F. were JEFFREY JONES's workers.⁶ A.F.

⁶ A.F. was charged, along with JEFFREY JONES, A.P., and M.Y., in 2007, with possession of firearms by a convicted felon. They were arrested together in a vehicle in September 2007 and four handguns were seized by police during the vehicle stop.

worked on the set selling drugs; he got them directly from JEFFREY JONES. A.F. was around the same age as CW-7. CW-7 knew that JEFFREY JONES owned or was otherwise involved in three other drug sets: (a) The Mailbox; (b) Liberty Street - R.L. was the boss there; and (c) Louis and Sycamore - this set was shared by JEFFREY JONES and H.J. In 2001, CW-7 went to jail for selling drugs at the Liberty Street set.

39. CW-4 advised that in 1998, after M.G. and G.R. were shot (and G.R. died) in late 1997, business at the 9th Street set significantly decreased. As a result, CW-4 went back to the Camelot to sell drugs. His cousin, H.J., was becoming a bigger drug dealer and supplied CW-4. H.J. then was being supplied with drugs by CW-5 and JEFFREY JONES; CW-4 saw both of them with H.J. at the Camelot. In that time period, CW-4 would see JEFFREY JONES pull up to the Camelot, H.J. would jump in JEFFREY JONES's car, and then a few hours later CW-4 and H.J. had more drugs to sell. H.J. told CW-4 that JEFFREY JONES was supplying him.
40. CW-4 advised that in or about 1998, H.J. started up a drug set at Louis and Sycamore Streets because there was a lot of police activity at the Camelot; this set was about six blocks from the Camelot. H.J. told CW-4 that JEFFREY JONES was supplying him with about 2-3 kilograms of cocaine, twice a week. CW-4 saw them meet at the set on a number of occasions. At that time, H.J. was around 19 years old. After H.J. started up this set, CW-4 started working for him, bagging up drugs. This set quickly became very busy, and was grossing about \$20,000 on a good day. CW-4 saw H.J. cooking up crack cocaine for the set at various locations; sometimes, JEFFREY JONES was present. Larry Reddick a/k/a "Lac" was the "muscle" (an enforcer) for H.J.; Reddick was about 4-5 years older than CW-4.⁷ CW-4's jobs included bagging up drugs for the set, collecting money, making deliveries of drugs and money, and being Reddick's companion. In time, JEFFREY JONES, S.C., and Bear learned that Reddick was the muscle for H.J. and they began using Reddick as muscle, too. Bear told CW-4 that H.J. looked up to JEFFREY JONES and JEFFREY JONES looked up to Tyke. According to CW-4, in this general time frame H.J. also began running the set by Betty's Lounge, on 9th Street between Mechanic & Atlantic Streets.⁸

Subsequently, they all pled guilty to conspiracy to violate 18 U.S.C. § 922(g) and received five year prison sentences.

⁷ Reddick is currently under indictment for (a) a drug-trafficking conspiracy in connection with his drug-trafficking activities with JEFFREY JONES and others, and (b) the drug-related murder of Brian "Pepe" Parker on or about January 5, 2000.

⁸ CW-5 advised that Tiz had this set first, and then Stephen Lindsey, who worked for and with Bear, ran it.

One of the MOB Boys testified during the Jevon Lewis and Bear trial that JEFFREY JONES and Bear opened a drug set at 9th and Atlantic, by Betty's Lounge, and used a third person to buy the Lounge, but never actually operated the Lounge as a bar/restaurant.

41. According to both CW-5 and CW-6, JEFFREY JONES was a very successful drug dealer by 1998. At that time, JEFFREY JONES was focused on the 10th and Van Hook drug set, which he had taken over after M.G. and G.R., who owned and operated the set one block away at 9th and Van Hook, were shot.⁹ In this time frame, both CW-5 and CW-6 saw JEFFREY JONES a lot, socialized with him, and discussed their drug business. At that time, the MOB Boys did not have a consistent source of supply for drugs, so at times when JEFFREY JONES got cocaine he would sell them some. CW-5 did most of these transactions with JEFFREY JONES. Sometimes, JEFFREY JONES gave the MOB Boys money to buy cocaine from L.P., their frequent source of supply. In that same time frame, CW-6 saw Tyke with JEFFREY JONES frequently, but did not know what their business dealings were.
42. In or about August 1999, Tyke began serving a lengthy prison term. Prior to that point, Tyke was actively involved with the MOB Boys at their Morton Street set. CW-6 advised that when Tyke went to prison, H.J. took over Tyke's source of supply for cocaine. CW-6 bought one-half kilogram of cocaine from H.J. on three occasions in 1998. H.J. continued to operate the Louis and Sycamore set until 2001, when H.J. was incarcerated and began serving a long prison sentence. According to CW-6, at his peak H.J. was very close to Bear; they took at least one trip together to Miami and often hung out together. And when H.J. was incarcerated, Bear became more involved in the Louis and Sycamore set. Meanwhile, JEFFREY JONES had "Sahn" (phonetic) and another person run his 10th Street set for him.
43. CW-5 advised that from late 1998 into 1999, the MOB Boys (including Tyke), JEFFREY JONES, and Bear occasionally pooled their money to buy wholesale quantities. In or about 1998, JEFFREY JONES called CW-5, they met, JEFFREY JONES showed him several guns in their boxes and offered to sell him them; at that time, JEFFREY JONES sold him a new 9 mm handgun. Also in that time frame, JEFFREY JONES told CW-5 that the 9th and Ferry Street set (which was very close to JEFFREY JONES's 8th & Central set) was his set.
44. CW-2 advised that in the late 1990s, he saw H.J. at the Camelot. CW-5 would help him out. H.J. started buying cocaine from Tyke and in 1999, when Tyke got locked up, he left his source of supply to H.J.

⁹ JEFFREY JONES's set at 8th and Central was about 1-2 blocks from the 9th and Van Hook set, so JEFFREY JONES's set and the latter set were competitors.

45. In addition, on New Years Eve (1998 into 1999), a number of drug dealers, including Tiz, JEFFREY JONES, Bear, and the MOB Boys traveled to Washington, D.C. in a limousine for a New Years celebration. Both CW-5 and CW-6 testified about this event during the trial of Bear and Jevon Lewis. They testified that the following drug dealers were in the limousine: JEFFREY JONES, Tiz, the MOB Boys (including Tyke), Bear, Melvin Brown a/k/a "Rice," H.J., and C.H. During the ride, Tiz talked to the other occupants about taking over the drug trade in Camden. He mentioned that the MOB Boys had the Morton Street set in Pollocktown, that he and Bear controlled East Camden, and that JEFFREY JONES had Centerville. Tiz said that if they all came together, they could control the city of Camden. Even prior to this limousine ride, this concept and group of drug traffickers were referred to as "The Firm."
46. On or about January 21, 1999, and while CW-1 was in a halfway house in Trenton, someone killed Tiz in Camden. As CW-1 testified, the rumor in Camden was that he had Tiz killed, because Tiz owed him a sizeable amount of money (a drug debt).
47. In or about July 1999, JEFFREY JONES started serving a lengthy prison sentence; he was not released until 2003. CW-4 advised that before JEFFREY JONES went to prison, JEFFREY JONES still controlled the 8th and Central set; he used his people to actually operate it. While JEFFREY JONES was in prison, CW-4 had no contact with him, but Larry Reddick and H.J. did. Reddick and H.J. sent JEFFREY JONES money to use in jail. Reddick also told CW-4 that he talked to JEFFREY JONES in jail. H.J. also kept Tyke updated (Tyke was in jail between approximately August 1999 and October 2003). In or about 1998-99, CW-4 spent considerable time with, among others, Bear, H.J., Tyke, C.H., and Melvin Brown a/k/a "Rice" and learned that they all were out in Cramer Hill at the 33rd Street set, along with Tiz, and that JEFFREY JONES was in business with them.
48. CW-5 advised that in 1999, JEFFREY JONES knew he was going to jail for a long time. CW-5 knew that Bear and JEFFREY JONES had been supplying H.J. with cocaine for his Louis & Sycamore set. When H.J. got locked up in 1999, CW-5 collected some money owed to H.J. from the operation of that set, and held it for H.J. When H.J. was released from jail, Bear and JEFFREY JONES would not supply him for a period of time, so he came to CW-5 and CW-2 for help. CW-5 advised that he and CW-2 gave him 4.5 ounces of cocaine and told him to pay them when he could. They also introduced H.J. to L.P. as a source of supply. CW-5 advised that Bear and JEFFREY JONES later began to work with H.J. again. JEFFREY JONES told CW-5 prior to going to jail in 1999 that R.L. was giving him money. CW-5 knew that after JEFFREY JONES went to jail, his sets were running the same as before, with the same crews. Bear told CW-5 that he was communicating with JEFFREY JONES while JEFFREY JONES was

incarcerated. CW-5 saw Bear's people with JEFFREY JONES's people at the Cotton Club, a nightspot, which was a little unusual since Cramer Hill people usually did not socialize with Centerville people. Once, in or about early 2001, CW-5 visited JEFFREY JONES at a drug treatment center before JEFFREY JONES was placed in a halfway house. CW-5 advised him about a meeting of their associates at the Cooper River Park near Camden to work out some problems. JEFFREY JONES advised CW-5 that he was associating with the people from Pollocktown and Cramer Hill, and was staying away from the Centerville people. CW-5 also visited Tyke in jail a few times. The MOB Boys were taking care of Tyke in jail, supplying him with money and drugs.

49. CW-2 advised that in or about 1998, when H.J. was released from jail, CW-5 (one of the other MOB Boys) helped him, and H.J. began buying cocaine from Tyke. In or about 1999, when Tyke got locked up, he left his source of supply to H.J.; CW-4 confirmed this. CW-2 confirmed that H.J. quickly expanded the set he started at Louis and Sycamore, and would talk to him and brag about the money he was making and how much cocaine he was selling. CW-2 also confirmed that H.J. and Bear became very close when JEFFREY JONES got locked up in 1999. He also confirmed that the MOB Boys bought cocaine from H.J. (in one-half kilogram quantities) when they were in need of cocaine.
50. CW-1 was in prison from late 1997 to late 2000 ("the jail period"). While incarcerated, V.R. and/or Ruben Lozada ran his drug business and they kept CW-1 advised of the status of the business.¹⁰ Although CW-1's drug set at Atlantic and Norris Streets continued to operate, his wholesale cocaine business continued at a diminished level. In particular, CW-1's organization did not supply Bear or JEFFREY JONES with cocaine during the jail period. When CW-1 was released from prison, he took back direct control of his organization. He also took steps to resume doing business with the drug dealers who had worked with and for Tiz (JEFFREY JONES was in prison then, and remained there until 2003). CW-1's problem was that there were people who believed that he had Tiz killed (in January 1999) while he (CW-1) was serving his sentence. This caused both safety and business problems for CW-1. Regarding safety, CW-1 knew that drug dealing was dangerous and that drug dealers could not afford to appear weak in the eyes of other drug dealers. So if a drug dealer's partner or associate was killed, the drug dealer often would want to retaliate by killing (or having killed) the person who murdered his partner/associate. So CW-1 feared that one of Tiz's many associates would retaliate against him. As for CW-1's business problem, before the jail period CW-1 had supplied a number of Tiz's associates--including JEFFREY JONES and Bear--with kilograms of cocaine, and he wanted to resume supplying them after the jail period. But if those associates believed that

¹⁰ Ruben Lozada pled guilty to drug-trafficking conspiracy, cooperated with law enforcement, and testified in the trial of Jevon Lewis and Bear.

CW-1 had Tiz murdered, they would be reluctant to resume dealing with CW-1, if they were even willing to deal with him at all.

51. In an attempt to confront these problems head on, CW-1 spoke to Bear and denied any involvement in Tiz's death, and Bear agreed to do business with CW-1 again. Soon, CW-1 began supplying Bear with kilograms of cocaine. Shortly after, CW-1, through an intermediary, started supplying the MOB Boys with kilograms of cocaine. And shortly after Jevon Lewis (who previously had sold drugs at 8th and Central along with JEFFREY JONES) was released from prison in or about April 2001, he too began buying kilograms of cocaine from CW-1. CW-1 then asked Jevon Lewis to set up a meeting with JEFFREY JONES, so that he could try to persuade JEFFREY JONES that he had nothing to do with Tiz's death. Lewis arranged for such a meeting, which occurred in December 2001 while JEFFREY JONES was in a halfway house. CW-1 recalled that the meeting was the weekend before Bear and JEFFREY JONES were arrested in a vehicle as a result of a traffic stop during which police found guns in their possession. That arrest occurred on December 16, 2001.¹¹ During that meeting, CW-1 explained why JEFFREY JONES should believe that he did not have Tiz killed. JEFFREY JONES told him that Lewis was going to give JEFFREY JONES's "young boy" (one of his young subordinates) a chance to sell at the 8th and Central set and asked CW-1 if he would supply that young boy with cocaine. CW-1 agreed to do so, but the young boy was never brought to CW-1. Previously, CW-1 had seen a young boy with JEFFREY JONES and assumed that this was the young boy to whom JEFFREY JONES was referring. Recently, CW-1 identified a photograph of S.C. as that young boy. As a result of this meeting of CW-1, Lewis, and JEFFREY JONES, while JEFFREY JONES and CW-1 did not deal drugs with each other directly again, CW-1 continued to supply many top associates of JEFFREY JONES and Tiz (then deceased) with cocaine.
52. CW-1 knew that H.J. was operating drug sets at Louis and Lansdowne and at Louis and Sycamore. In or about 2001, H.J. asked CW-1 to supply him with wholesale quantities. H.J. said his sets were selling 2-3 kilograms of crack cocaine a week. H.J. told him that he knew that CW-1 was supplying Bear and said that Bear was supplying him (H.J.). CW-1 refused to sell him wholesale quantities and told H.J. that they (CW-1 and H.J.) would continue to do business through Bear. In addition, around this time, Jevon Lewis told CW-1 about "The Firm."
53. From the time CW-1 began supplying Bear, the MOB Boys, and Jevon Lewis with cocaine in early to mid-2001, up until he was arrested in March 2003, CW-1 supplied each person/group in general with more than 10 kilograms per month.

¹¹ For a detailed description of that arrest, see paragraph 65 herein.

54. In or about 2001, CW-3 was in Camden dealing various drugs. He talked to JEFFREY JONES, who told him that he needed drugs in jail. So JEFFREY JONES and CW-3 met at Riverfront Prison and developed a plan to smuggle drugs into the prison, using an intermediary (N.C.). For the next year, CW-3 was able to supply drugs to JEFFREY JONES at the prison.
55. In or about 2001-02, CW-3 and JEFFREY JONES had several discussions about the latter's plans to reestablish himself and his drug associates in Camden. Specifically, JEFFREY JONES advised that they would establish themselves in these areas: (a) JEFFREY JONES and Jevon Lewis - Centerville (during this time period, CW-1 was supplying Lewis, and Lewis was well-established in Centerville); (b) Bear - East Camden and Cramer Hill; (c) CW-5 - Pollocktown; (d) JEFFREY JONES - Fairview; and (e) CW-3 - downtown Camden.
56. On or about June 27, 2002, CW-3 and JEFFREY JONES had a telephone conversation; JEFFREY JONES was in jail at that time. Law enforcement was conducting a wiretap at that time and therefore was able to record that conversation. JEFFREY JONES told CW-3 that when he got out of jail, he was going to take back control of the drug business and that Jevon Lewis (who then was a major customer of CW-1) would have to decide whether he was with JEFFREY JONES or with CW-1. CW-3 advised that one time, while JEFFREY JONES was in jail, JEFFREY JONES told him that he knew CW-3 and he knew Bear and he wanted CW-3 and Bear to deal with each other. One time in this time frame, CW-3 needed a kilogram of cocaine. CW-3 went to Bear, Bear got a kilogram from CW-1 and gave it to CW-3. Telephone records in the immediate time frame of this transaction in part corroborate this account of CW-3. CW-3 advised that he twice got kilograms of cocaine from Bear. On another occasion, L.P. was the victim of a violent crime. JEFFREY JONES and CW-3 talked and JEFFREY JONES offered help if needed.
57. In early 2000, CW-4 began serving a lengthy prison sentence. Once he arrived in the prison, he would talk to H.J. over the telephone, and H.J. would send him money to be placed on CW-4's books at the jail. This stopped when H.J. himself went to jail in 2001.
58. CW-3 confirmed that JEFFREY JONES, while in a halfway house, had a discussion with CW-1 about possibly supplying cocaine to JEFFREY JONES or his people. Moreover, in or about mid-2001, JEFFREY JONES told CW-3 that he had a half kilogram of cocaine. They then met and CW-3 purchased that half kilogram. When CW-3 tried to cook it up into crack cocaine, there was a problem with the quality of the cocaine; JEFFREY JONES told CW-3 he would make up CW-3's loss the next time. There was another time when JEFFREY JONES

asked L.P. to help Jevon Lewis.¹² L.P. then gave a half kilogram of cocaine to Lewis, but Lewis did not pay him. L.P. asked CW-3 for assistance and CW-3 spoke to JEFFREY JONES about this.

59. CW-6 was incarcerated for a time in 2001, and after he was released, he and CW-5 met with JEFFREY JONES at JEFFREY JONES's house in or about April 2001 (JEFFREY JONES was in a halfway house then and was home on a furlough). They discussed the situation with S.H., an enforcer for several drug dealers, who was almost done serving a sentence. While they were there, Bear, CW-3, and Jevon Lewis all came to JEFFREY JONES's house to visit JEFFREY JONES. Lewis told the others that he had a kilogram of cocaine in the trunk of his car and as a result was told to leave immediately. While CW-6 was present, he saw CW-3 and JEFFREY JONES have a discussion, and he also saw Bear and JEFFREY JONES talk briefly. CW-6 also advised that he knew about the situation at the Louis and Sycamore set because, among other reasons, it was geographically very close to the MOB Boys' Morton Street set. CW-6 further explained that after H.J. was arrested and incarcerated in 2001, two of H.J.'s drug associates, Larry Reddick and R.S. (Tyke's brother) tried to run the set but they were poor businessmen and the set started declining. CW-2 confirmed this; he had talked to Reddick and R.S. about the set. They told CW-2 that their source of supply was Bear. Reddick and R.S. complained about the quality of Bear's cocaine and that he was not supplying them consistently and that as a result business was slow. Bear himself would talk to one or more of the MOB Boys at their set and complain that Reddick and R.S. did not know how to run their set competently and that they were not paying him for all the cocaine he was supplying them with. Bear's people (especially Stephen Lindsey and A.B.) later took control of that set.
60. CW-5 knew that Jevon Lewis was one of JEFFREY JONES's drug associates, because JEFFREY JONES always talked about him, even though Lewis was in prison from approximately 1995 to April 2001. CW-5 believed that the set at 8th and Central was a neighborhood set, until Lewis came home from jail in the spring of 2001 and took control of it.

Key Events during 1998-2003

61. In or about April 1998, Tyke and H.J. were arrested for drug trafficking and eventually were convicted and sentenced to lengthy prison terms. Tyke began serving his sentence in 1999 and H.J. began serving his sentence in 2001.

¹² CW-3 knew that JEFFREY JONES did a lot of business with L.P.; L.P. and Zeke (JEFFREY JONES's father) were close.

62. In or about May 1998, R.L. (now deceased) was arrested for illegal possession of a weapon after leaving the vicinity of 9th & Van Hook, after he fled from police and was seen discarding a defaced gun.
63. In or about March 1999, A.F. was arrested twice for different offenses and subsequently convicted of drug trafficking and conspiracy.
64. In or about August 2000, A.F. was arrested for drug trafficking.
65. On or about December 16, 2001, at approximately 1:30 a.m., A.F., along with two others, assaulted his ex-girlfriend with a gun, then left and went to a party, where he was arrested for the assault. At about 2:55 a.m., based on an anonymous call to the police, JEFFREY JONES and Bear were stopped in a vehicle outside the location of the party. Two semiautomatic pistols were seized from the vehicle by police. Bear subsequently pled guilty to unlawful possession of a weapon, was sentenced to three years imprisonment, and began serving his sentence in January 2003. JEFFREY JONES was in a halfway house at that time, so he was sent back to prison. Shortly after they were arrested, CW-1 asked Bear why CW-1 had not heard from JEFFREY JONES after CW-1's recent meeting with JEFFREY JONES, and then Bear told CW-1 what had happened.
66. On or about May 7, 2003, A.F. was arrested at 9th and Van Hook and subsequently convicted of drug trafficking. At that time, several bags of crack cocaine and approximately \$360 were seized from A.F.

2003-2007

67. In 2003, CW-7 came home from jail and began working at the 9th and Van Hook drug set, along with A.F. and others. They were working under D.B. When JEFFREY JONES came home from jail later in 2003, A.F., among others, went to work at the 10th and Van Hook drug set. JEFFREY JONES approached CW-7 and his fellow workers and offered to sell cocaine to them. CW-7 and the others agreed to buy cocaine from JEFFREY JONES, but it was of low quality and they suspected that JEFFREY JONES was trying to hurt business at the 9th Street set by supplying poor quality cocaine. JEFFREY JONES later admitted to CW-7 that this was true. As a result, in or about October 2004, CW-7 moved to the 10th Street set and worked with A.F. there. A.F. and H.S. (now deceased) ran that set for JEFFREY JONES. CW-5 confirmed H.S.'s role in the operation of the 10th Street set.
68. According to CW-5, after Tyke was released from prison in late 2003, he rejoined the MOB Boys. CW-6, one of the MOB Boys, said that he and Tyke were partners from 2004 to mid-2005. In 2005-06, Tyke controlled a work shift at their Morton Street drug set, while CW-6 and CW-2 controlled another work shift.

CW-6 recalled an incident in or about early 2004 where there was a meeting at the Saloon, a bar. The MOB Boys, including Tyke, met with Bear, Reddick, and R.S. JEFFREY JONES arrived and entered the rest room. CW-6 saw an off-duty police officer there and sent CW-2 into the rest room to warn JEFFREY JONES. CW-2 saw JEFFREY JONES in the rest room arranging his gun. CW-5 also told law enforcement about this meeting. He explained that Bear used this meeting to complain to Tyke that the MOB Boys did not help him regarding the murder of S.H. (previously, Bear had asked the MOB Boys to kill Harvey). During this incident at the Saloon, Bear had a private discussion with JEFFREY JONES in the rest room; CW-5 does not know what they discussed.

69. CW-5 also recalled an incident in the summer of 2004, where JEFFREY JONES, along with a van full of juveniles from Centerville, arrived at a BBQ that someone was throwing. Several of the people in JEFFREY JONES' group had guns. The MOB Boys, including Tyke, talked to JEFFREY JONES on this occasion and JEFFREY JONES told them about his plans in the drug business.
70. In or about 2004, CW-7 was working for JEFFREY JONES. He explained to law enforcement that JEFFREY JONES would set up other drug dealers to be robbed and that he and A.F. would carry out the robberies, which netted drugs and/or money for JEFFREY JONES. CW-7 participated in about two to three such robberies.
71. CW-4 advised that in or about 2004, he was a manager at the 10th and Van Hook drug set, which JEFFREY JONES owned. CW-4 saw JEFFREY JONES occasionally, but heard from H.S., Reddick, and others that JEFFREY JONES was living down south. In 2008, while they were in custody together, JEFFREY JONES told CW-4 that this was true. H.S. also told CW-4 that JEFFREY JONES was his source of supply. One day, CW-4 was at H.S.'s house when JEFFREY JONES came by. CW-4 told JEFFREY JONES he was having problems selling crack cocaine. JEFFREY JONES told CW-4 to come by later and that he would help CW-4 out. JEFFREY JONES gave CW-4 three quarter-ounce quantities of crack, but said that the quality was not that good. CW-4 also knew that in the 2004-05 time frame, R.W. ran The Mailbox and that Bear supplied it with cocaine.
72. CW-4 in 2005, prior to the death of H.S., had a conversation with R.L. R.L. told CW-4 that he thought that H.S. was soft and that he wanted H.S. out of the way. At that time, JEFFREY JONES was supplying R.L. with wholesale quantities. After H.S. died, CW-4 again spoke with R.L., who told him that JEFFREY JONES would let R.L. have the 10th and Van Hook drug set. R.L. knew he would be going to jail soon, and R.L. told CW-4 that JEFFREY JONES said he would give R.L. the drug set for a week, so that he could get a lot of money before he had to go to jail.

73. During approximately 2004-07, JEFFREY JONES basically lived in the Atlanta, GA vicinity. Not only did he tell several coconspirators, including CW-5, that this was so, but the FBI also conducted surveillance, including but not limited to the date of July 12, 2007, and observed JEFFREY JONES flying back and forth to Georgia using the alias "Marcus Anderson." Tyke advised CW-5 that JEFFREY JONES had started up a business in Atlanta.
74. CW-6 advised that in early 2006, when Bear and Jevon Lewis and five others were indicted federally for drug-trafficking conspiracy, Tyke called and said that JEFFREY JONES wanted to meet with the MOB Boys. A meeting occurred and JEFFREY JONES wanted to know the status of Bear's case. There was a discussion in which JEFFREY JONES tried to identify who had "snitched," i.e., cooperated with law enforcement, because JEFFREY JONES thought that is what led to the indictment.
75. In or about late 2006, a major dispute developed between JEFFREY JONES and R.L. (now deceased). The dispute apparently arose over the seizure by police from JEFFREY JONES of a substantial amount of cash. On or about November 29, 2006, a vehicle containing JEFFREY JONES and two other males was heading south through Virginia, when it was stopped by the police, who took a videotape of the traffic stop. A search was conducted and JEFFREY JONES was found in the possession of approximately \$93,000 and approximately nine cellular telephones. The police seized this money but did not arrest JEFFREY JONES. After the seizure, R.L. was skeptical that the police seized this money since JEFFREY JONES was not arrested. It is my opinion that JEFFREY JONES was on the way to buy drugs with money that belonged to both him and R.L.
76. CW-4 told the FBI that in 2008, he and JEFFREY JONES were together in the Federal Detention Center in Philadelphia for a few days and talked for hours about drug trafficking. JEFFREY JONES told CW-4 in substance and in part as follows. In or about 2006-07, JEFFREY JONES had a "beef" (dispute) with R.L. JEFFREY JONES had been renting his 10th and Van Hook drug set to R.L. for thousands of dollars a week. JEFFREY JONES had been working in Atlanta driving trucks. He met some Mexican drug dealers there and they sold him two kilograms of cocaine for \$9,000 each. The Mexicans told him that they would deal with him, but only in amounts greater than \$100,000. So he drove up to Camden to get money and then was driving back down south with the money when the police stopped and seized the money. The next week, JEFFREY JONES returned to Camden. Shortly thereafter, JEFFREY JONES went to a special meeting place that he and R.L. previously had arranged. R.L. and JEFFREY JONES would meet there weekly, on the same day and at the same time. On this occasion, R.L. did not show up to meet with JEFFREY JONES. Soon thereafter, people started shooting at JEFFREY JONES and he therefore assumed it was R.L. or his associates. And this was the beginning of JEFFREY

JONES's "war" with R.L.

77. CW-4 also advised that in his discussions with JEFFREY JONES at FDC-Philadelphia, JEFFREY JONES told him that one day, during the war with R.L., JEFFREY JONES got word that R.L. and his crew were in a black Escalade. So JEFFREY JONES, M.Y., and A.P. got guns and drove around looking for a black Escalade. They located and stopped a black Escalade, but R.L. was not in it.
78. CW-7 advised that in 2007, although he was in a halfway house, he saw JEFFREY JONES and A.P. in a car, and they had guns in their laps. JEFFREY JONES told CW-7 the following in substance and in part. JEFFREY JONES said that there was a beef between him and R.L., and that if CW-7 saw R.L., he should call JEFFREY JONES at a number JEFFREY JONES provided to CW-7. When CW-7 came home from the halfway house, nobody could sell drugs at the 10th and Van Hook drug set.
79. On or about September 27, 2007, JEFFREY JONES, A.F., M.Y., and A.P. were arrested together in a vehicle in Camden in September 2007 and four handguns were seized by police during this vehicle stop. When JEFFREY JONES was arrested, a receipt dated September 14, 2007 was found in the name of "Marcus Anderson." This was the alias JEFFREY JONES had used to travel to and from Atlanta. The receipt showed that a "Marcus Anderson," with the phone number 267-325-5045, had made a \$25 deposit at a Philadelphia gun distributor (Colosimo's) for a future purchase of a gun magazine. When JEFFREY JONES was arrested, he also had a cell phone on his person. The phone number for that phone was 267-325-5045. All four men were subsequently charged with possession of firearms by a convicted felon, and all pled guilty to a conspiracy to violate 18 U.S.C. § 922(g). They all received five year prison sentences.
80. CW-7 advised that on the day before September 27, 2007, CW-7 noticed that R.L. was parked in a vehicle on a lot. CW-7 was on 9th Street by a liquor store. JEFFREY JONES and A.F. drove up and each had a gun. JEFFREY JONES exited and approached CW-7 and asked him questions, which CW-7 inferred was an attempt by JEFFREY JONES to determine CW-7's allegiances. CW-7 was worried that R.L. would see them, but R.L. could not see them from his vantage point.

Key Events - 2004-07

81. In or about January 2004, A.F. again was arrested and subsequently convicted of drug trafficking after being seen attempting to conduct a drug transaction. He initially ran from police and discarded a bag containing ten baggies of crack. Upon his arrest, \$2,311 was found on his person, and he told the arresting officer in substance: come on, you know I don't trap. I'm the boss out here. I was

collecting my money. I know that "trap" is a slang term for selling drugs hand-to-hand at a drug set.

82. On or about June 24, 2004, Jevon Lewis was arrested in Philadelphia with one-eighth of a kilogram of crack cocaine and a handgun. He was charged federally with violating 18 U.S.C. § 922(g) and was convicted at trial. As a result of this and his later federal conviction following his trial with Bear, he has remained in jail ever since.
83. On or about June 24, 2004, JEFFREY JONES and H.S. were stopped by the police at 9th and Central (one block from the 8th and Central drug set) and were found to be in possession of \$10,700. JEFFREY JONES stated in substance to the police, when asked how he felt about losing the money, that it was no big deal and that you have to take "L's" at times. JEFFREY JONES also told a law enforcement officer present that he and the other officers should take the money and treat their families to a vacation on him.
84. On or about July 7, 2004, Jevon Lewis's girlfriend was collecting money to bail him out of jail. A traffic stop occurred, and the money she had been collecting was seized. During the stop, her cell phone rang with several incoming calls from "Jazzy" or "Jazz" (number: 856-655-7091). This was observed by law enforcement officers.
85. On or about June 29, 2004, JEFFREY JONES was recorded (a) talking about cooking up crack cocaine, and (b) offering a confidential source one-eighth kilogram of crack cocaine. Also, around this time, A.B. and H.S. were recorded discussing (a) 10th & Van Hook, and (b) JEFFREY JONES changing phones.
86. On or about July 14, 2005, K.C., the brother of S.C. (who worked for JEFFREY JONES), was stopped by police and found to be in possession of \$2,000, as a result of a confidential source's purchase of crack cocaine from him at 10th and Van Hook. This transaction was captured by surveillance officers on videotape.
87. On or about August 9, 2005, a confidential source bought one ounce of crack cocaine from K.C. at 10th and Van Hook.
88. On or about August 17, 2005, a confidential source bought one ounce of crack cocaine and two ounces of fake crack from K.C. at 10th and Van Hook.
89. On or about September 16, 2005, Tyke was arrested for unlawful possession of a firearm.
90. On or about January 10, 2006, K.C. was arrested at The Mailbox with \$4,000; a stash of 24 bags of crack and 43 bags of marijuana was found nearby. K.C. had been seen directing buyers to a seller at The Mailbox.

91. On or about February 7, 2006, Jevon Lewis, Bear, and five others were arrested when a federal drug-trafficking conspiracy indictment was unsealed. All seven people subsequently were convicted.