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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA : CRIMINAL COMPLAINT  
: :  
v. : :  
: :  
FELICIA HOLT, : Magistrate No. 13-  
a/k/a "Fee" :

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent for the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.

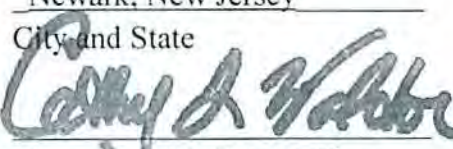


Catherine Petula  
Special Agent, FBI

Sworn to before me and subscribed in my presence,

8/6/12  
Date

HON. CATHY WALDOR  
United States Magistrate Judge

Newark, New Jersey  
City and State  
  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

From on or about August 1, 2012 through on or about March 1, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant FELCIA HOLT, a/k/a "Fee," did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

**COUNT TWO**

From on or about August 1, 2012 through on or about March 1, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant FELCIA HOLT, a/k/a "Fee," did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C),

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

## ATTACHMENT B

I, Catherine Petula, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon my investigation and discussions with other law enforcement personnel. Any statements herein attributed to individuals are set forth in substance and in part unless otherwise specifically indicated.

1. From on or about August 1, 2012 through on or about March 1, 2013, defendant FELICIA HOLT, a/k/a "Fee" ("FEE"), worked in conjunction with co-conspirators to distribute heroin and oxycodone out of a retail store in Newark, New Jersey ("the Retail Store"). During this time period, FEE met with a confidential source ("CS-1") on approximately 16 occasions, during which meetings FEE sold heroin and/or oxycodone pills to CS-1. The majority of the meetings were consensually audio and video recorded.
2. On or about August 29, 2012, FEE and two co-conspirators not charged herein ("UCC-1" and "UCC-2") met with CS-1 outside of the Retail Store. During the course of the ensuing conversation, FEE asked CS-1 what CS-1 needed and CS-1 replied "15 blues." Based upon my training and experience, and the investigation to date, CS-1 was asking Fee to provide CS-1 with 15 oxycodone pills.
3. FEE then asked CS-1 to come into the Retail Store and left UCC-1 and UCC-2 behind to watch for the police. Once inside, FEE walked behind the counter and retrieved a large prescription pill bottle from one of the shelves. FEE opened the bottle and poured out approximately 15 pills, and then handed those pills to CS-1 in exchange for \$300. The pills subsequently tested positive for the presence of oxycodone.
4. On or about September 5, 2012, CS-1 contacted another co-conspirator not charged herein ("UCC-3") in order to purchase narcotics. UCC-3 told CS-1 to go to the Retail Store. As CS-1 arrived at store, UCC-3 and FEE pulled in front of the location in a vehicle. FEE got out of the vehicle and entered the Retail Store with CS-1. CS-1 asked FEE for "a bundle and the rest in blues" to equal \$300. FEE handed CS-1 ten glassine envelopes containing heroin and eleven oxycodone pills in exchange for \$300. Laboratory test results indicate the presence of oxycodone and heroin.
5. On or about December 13, 2012, FEE and UCC-3 met with CS-1 at the Retail Store. Approximately one hour prior to the meeting, CS-1 called UCC-3 and asked if CS-1 could purchase heroin. In response, UCC-3 told CS-1 to go to the Retail Store.

6. When CS-1 arrived at the Retail Store, UCC-3 and FEE were inside the Retail Store. UCC-3 told CS-1 that the heroin would be delivered to the Retail Store within the hour. During the wait, and in FEE and CS-1's presence, UCC-3 placed numerous telephone calls concerning the delivery of the heroin. Thereafter, another individual entered the Retail Store and, in the presence of FEE and CS-1, handed UCC-3 a bag containing heroin. UCC-3 then, in FEE's presence, handed CS-1 ten pre-packaged bricks of heroin in exchange for \$2,230. Laboratory test results indicate the presence of heroin and that the mixture and substance had an approximate weight of 5 grams.
7. On or about January 3, 2013, FEE and UCC-3 met CS-1 at the Retail Store. Prior to the meeting, CS-1 called UCC-3 and asked if CS-1 could purchase heroin. In response, UCC-3 told CS-1 to go to the Retail Store. CS-1 went to the store where CS-1 was met by FEE. Once inside, FEE told CS-1 that UCC-3 left the store and that she would be handling the drug transaction. FEE handed CS-1 five pre-packaged bricks of heroin in exchange for \$1,175. Laboratory test results indicate the presence of heroin.
8. Between on or about August 1, 2012, and on or about March 1, 2013, FEE and her co-conspirators sold CS-1 a total of over 100 grams of a mixture and substance containing heroin and approximately 14 grams of a mixture or substance containing oxycodone.