

CONTENTS APPROVED

UNITED STATES ATTORNEY

BY: _____
NELSON S.T. THAYER, JR.
Assistant United States Attorney

Date: _____

ATTACHMENT A

COUNT ONE

From in or about August 2014 through in or about October 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL FLEETWOOD, a/k/a “Dell,”
WENDELL BETHEA, a/k/a “Rell,” a/k/a “Ruger,”
BRANDON JONES,
JULIO ALVARADO
and
ERICA FLEETWOOD,

did knowingly and intentionally conspire and agree with each other and with others to distribute and possess with intent to distribute controlled substances, specifically: (1) 100 grams or more of a mixture and 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), and (2) 50 grams or more of methamphetamine, also known as “Ice,” a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

COUNT TWO

On or about August 18, 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger," and
BRANDON JONES,

did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

On or about August 22, 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger,"

did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOUR

On or about August 22, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Camden County, did knowingly possess in and affecting commerce a firearm, namely: 1) a high-capacity CN ROMARM Ak-47-style 7.62x39mm caliber assault rifle, bearing serial number S174650-2003; and 2) a high-capacity Cobray model M11 9mm caliber assault pistol, bearing serial number 89-0006620.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT FIVE

On or about September 8, 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL FLEETWOOD, a/k/a “Dell,”
WENDELL BETHEA, a/k/a “Rell,” a/k/a “Ruger,”
JULIO ALVARADO
and
ERICA FLEETWOOD,

did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SIX

On or about September 17, 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL FLEETWOOD, a/k/a “Dell,”
WENDELL BETHEA, a/k/a “Rell,” a/k/a “Ruger,”
JULIO ALVARADO
and
ERICA FLEETWOOD,

did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about September 17, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Camden County, did knowingly possess in and affecting commerce a firearm and ammunition, namely a Maadi Co. AK-47-style 7.62x39mm caliber assault rifle, bearing serial number CM07753, loaded with eleven rounds of 7.62x39mm ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT EIGHT

On or about September 30, 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL FLEETWOOD, a/k/a “Dell,” and
WENDELL BETHEA, a/k/a “Rell,” a/k/a “Ruger,”

did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, 5 grams or more of methamphetamine, also known as “Ice,” a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT NINE

On or about September 30, 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

WENDELL FLEETWOOD, a/k/a “Dell,” and
WENDELL BETHEA, a/k/a “Rell,” a/k/a “Ruger,”

did knowingly and intentionally possess with the intent to distribute, and aid and abet the possession with the intent to distribute, 50 grams or more of methamphetamine, also known as “Ice,” a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TEN

On or about September 30, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Camden County, did knowingly possess in and affecting commerce a firearm and ammunition, namely a Beretta .40 caliber handgun, bearing a defaced serial number, loaded with four rounds of .40 caliber ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

ATTACHMENT B

AFFIDAVIT

I, Jacob B. Archer, am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2009. I am assigned to the Philadelphia Division's South Jersey Resident Agency, located in Cherry Hill, New Jersey. Prior to joining the FBI, I served as a police officer in New Jersey for seven years. During my time in law enforcement, I have investigated numerous cases involving illicit drug activity and violence, including, but not limited to, cases involving the use of confidential informants, undercover officers and electronic surveillance. As an FBI Special Agent, I have received specialized training in telecommunications exploitation. I have participated in all aspects of narcotics and violent gang investigations including conducting surveillance, analyzing toll information obtained as a result of issued subpoenas, and analyzing information obtained from court-ordered pen registers, and trap and trace intercepts. I have also assisted in investigations involving the interception of wire communications, including the interception of wire communications related to this investigation. I have debriefed or participated in the debriefings of numerous defendants, informants, and witnesses who had personal knowledge of narcotics trafficking and gang organizations. I am familiar with the techniques used by persons involved in illegal drug trafficking to avoid detection and arrest by law enforcement officials. I am also familiar with the methods and jargon used while engaging in illegal narcotics transactions, and with the items, equipment and types of packaging materials that are utilized in the distribution of controlled dangerous substances, and in particular by narcotics traffickers in and about the City of Camden, New

Jersey. Many of these cases resulted in the execution of search and arrest warrants, and I have participated in hundreds of searches and arrests of individuals suspected of engaging in illicit drug activity. Moreover, I have previously testified before federal and state grand juries and I have been the affiant on various federal search and arrest warrants. Additionally, I have been an affiant on New Jersey wiretap applications. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of intercepted telephone calls and texts, reports, documents, and items of evidence. Because this Affidavit is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and in part. All times alleged are approximate. When I assert that an event took place on a specific date, I am asserting that it took place on or about the date alleged.

THE INVESTIGATION

1. Since at least as early as March 2014, law enforcement officers from the FBI's South Jersey Resident Agency's South Jersey Violent Gang Offender Task Force; the Drug Enforcement Administration ("DEA"), Maple Shade Resident Office's High Intensity Drug Trafficking Area ("HIDTA") Task Force; New Jersey State Police Violent and Organized Crime Bureau, Trafficking South Unit; and the Camden County Prosecutor's Office have been conducting an investigation into the drug distribution activities of Wendell FLEETWOOD ("WENDELL FLEETWOOD"), also known as "DELL;" his cousin Wendell BETHEA ("BETHEA"), also known as "RELL" and "RUGER;" Brandon JONES ("JONES"); Julio ALVARADO ("ALVARADO"); and WENDELL FLEETWOOD's sister, Erica FLEETWOOD

(“ERICA FLEETWOOD”), in the City of Camden area, and others, in New Jersey. I submit this affidavit of probable cause in support of Criminal Complaints charging the aforementioned individuals with violations of federal narcotics and firearms laws as set forth in Attachment A; namely, Title 21 United States Code, Sections 846 and 841(a) and (b)(1)(A) and (B), conspiracy to distribute and possess with intent to distribute controlled substances and distribution and possession with intent to distribute controlled substances, and Title 18, United States Code, Section 922(g)(1), knowing possession of a firearm by a convicted felon.

2. Through the court-authorized interception of wire communications over cellular telephones used by the co-conspirators, analysis of location data information, mobile surveillance, pole camera surveillance, confidential source information, controlled purchases and other means, this investigation has established the following: From at least as early as late 2013 through October, 2014, WENDELL FLEETWOOD, BETHEA, ALVARADO, JONES and ERICA FLEETWOOD were members of a conspiracy, the purpose of which was to profit from the distribution of controlled substances, chiefly heroin, in and around Camden County, New Jersey. The leader of this organization (hereinafter referred to as the “Fleetwood Drug Trafficking Organization”) was WENDELL FLEETWOOD. WENDELL FLEETWOOD obtained wholesale quantities of heroin, crystallized methamphetamine and marijuana from out of state, utilizing the United States Postal Service. WENDELL FLEETWOOD then supplied smaller wholesale quantities of heroin to BETHEA and ALVARADO, who then broke up and re-packaged the heroin for further resale, or resold the wholesale quantities they received from FLEETWOOD to other distributor-level customers. Intercepted calls during the course of the investigation captured WENDELL FLEETWOOD, BETHEA, JONES, ALVARADO and their

associates discussing and directing the purchasing, processing, packaging, storing and distributing of heroin, as well as the pricing and collection of the proceeds from its sale. Intercepted calls involved members of the Wendell Fleetwood DTO discussing the sale of “bundles” and “bricks,” which are multiple-bag quantities of heroin; stamps used to affix a brand name to the bags of heroin; wax paper used in the packaging of heroin; scales; and weights of heroin to be sold. Intercepted calls also captured BETHEA engaged in the trafficking of firearms, including high-capacity assault weapons, and in one case, a handgun that he knew had been used to commit a homicide the night before.

3. During the course of the investigation, information was also developed that members and associates of the Wendell Fleetwood DTO employed various methods to avoid law enforcement detection. For example, based upon intercepted communications, the investigation determined that one method was to utilize for short periods of time rental cars and cars obtained from out of state, which the investigation had indicated were stolen or otherwise fraudulently obtained. Also based on the investigation, including reliable confidential source information, another method used by the Fleetwood DTO was to deposit some of the Wendell Fleetwood DTO’s cash proceeds into various bank accounts in amounts less than \$10,000. In my training and experience, individuals and criminal organizations engaged in money laundering will make cash deposits into “straw” accounts, in amounts less than \$10,000 in order to avoid the generation of Currency Transaction Reports, from which the funds are then withdrawn by wire or other means. For example, on or about July 21, 2014 JONES was pulled over by Camden County Police – Metro and found to be in possession of \$6,256 in cash and a slip of paper bearing a name, out of state address and suspected bank account number. Members and associates of the DTO also

utilized services such as Western Union, Money Pak and other transfer services during the course of the investigation to conduct transactions. Another method was to change or “drop” cellular phones frequently, and to restrict the knowledge of their phone numbers to a select few. As part of this effort, ERICA FLEETWOOD served as a buffer and intermediary for WENDELL FLEETWOOD in his contacts with his criminal associates, including BETHEA and JONES, passing messages between them in order to insulate WENDELL FLEETWOOD from law enforcement detection, and to thwart law enforcement’s ability to intercept their telephonic conversations. The investigation, including an intercepted communication of a conversation with WENDELL FLEETWOOD, also determined that members of the Wendell Fleetwood DTO used cloud-based storage systems to back up the information contained in their cellular telephones. JONES, ALVARADO and ERICA FLEETWOOD also performed countersurveillance for the Wendell Fleetwood DTO.

4. WENDELL FLEETWOOD has four felony convictions: a 2006 distribution of heroin/cocaine conviction and a 2006 manufacturing/distributing CDS conviction, for which he was sentenced to three years’ imprisonment concurrently; and a 2009 unlawful possession of a handgun conviction and a 2010 unlawful possession of a handgun conviction, for each of which he was sentenced to five years’ imprisonment, respectively.

5. BETHEA has two felony convictions, a 2005 robbery conviction, for which he was sentenced to four years’ imprisonment, and a 2010 hindering apprehension conviction, for which he was sentenced to eighteen months’ imprisonment.

6. JONES has three felony convictions: a 2008 attempting to elude police conviction, for which he was sentenced to five years’ probation; a 2009 theft of movable property conviction, for

which he was sentenced to five years' probation, and then subsequently sentenced to three years' imprisonment approximately six months' later on a probation revocation; and a 2011 assault on police conviction, for which he was sentenced to three years' imprisonment.

7. ALVARADO and ERICA FLEETWOOD have no felony convictions.

Telephones Intercepted during the Investigation

8. As a part of this investigation, wire interceptions authorized by the Superior Court of New Jersey were in place from approximately June, 2014 through October, 2014.

9. Specifically, on June 27, 2014, the Honorable Samuel D. Natal, Superior Court Judge, authorized interception of (856) 655-7453 (hereinafter "the First Bethea Facility"), a cellular telephone used by BETHEA; and (856) 916-7869 (hereinafter "the Alvarado Facility"), a cellular telephone used by ALVARADO. On July 17, 2014, Judge Natal authorized interception of (313) 492-1803 (hereinafter "the Second Bethea Facility"), a cellular telephone used by BETHEA; and continued interception of the Alvarado Facility. On August 15, 2014, Judge Natal authorized interception of (856) 655-5369 (hereinafter "the Third Bethea Facility"), a cellular telephone used by BETHEA; and continued interception of the Alvarado Facility. On September 15, 2014, Judge Natal authorized interception of (609) 221-1133 and (267) 340-0361, cellular telephones used by BETHEA (hereinafter "the Fourth Bethea Facility" and "the Fifth Bethea Facility," respectively); (856) 381-2587 (hereinafter "the Erica Fleetwood Facility"), a cellular telephone used by ERICA FLEETWOOD; and continued interception of the Alvarado Facility. On October 1, 2014, Judge Natal authorized interception of (678) 559-4932 (hereinafter "the Wendell Fleetwood Facility"), a cellular telephone used by WENDELL FLEETWOOD. On October 7, 2014, Judge Natal authorized continued interception of the Erica

Fleetwood Facility.

10. This Affidavit includes draft summaries of intercepted calls, some of which contain draft direct excerpts of the intercepted content. Identification of call participants was made by several means, including, but not limited to, surveillance, voice identification and self-identification; for example in separate intercepted communications, BETHEA referred to himself as “Uncle Rell;” WENDELL FLEETWOOD identified himself as “DELL;” and ERICA FLEETWOOD identified herself as “ERICA.” My comments about the subject matter of the interceptions are based on my knowledge, training and experience, and that of other law enforcement officers with whom I have spoken, and the results of the investigation to date.

Heroin, Methamphetamine and Firearms Purchases from the Fleetwood DTO

August 18, 2014 Undercover Purchase of 50 Grams of Heroin

11. On August 18, 2014, an undercover employee (“UCE”) met with BETHEA. Specifically, the UCE purchased approximately 50 grams of heroin from Bethea. Pertinent details concerning the drug purchase are detailed below. At approximately 2:40 p.m. on August 18, 2014, after being directed by BETHEA via the Third Bethea Facility/cellular telephone (856) 655-5369 to the 100 block of North 25th Street in Camden, the UCE arrived and parked in an undercover police vehicle (“UCE’s vehicle”) directly across from 113 North 25th Street, a location identified by BETHEA as “my spot.” A surveillance unit observed BETHEA in the area of 113 North 25th Street, and BETHEA entered the rear passenger side of the UCE’s vehicle. BETHEA introduced himself as “Rug” (pronounced as an abbreviation of “Ruger”), and instructed the UCE to pull out to pick up the “stuff.” The UCE observed BETHEA place a call on a cellular phone, and overheard BETHEA refer to the male on the other line as “Bro.”

The UCE understood the nature of the conversation based on his experience, training and knowledge of the investigation, to relate to arranging a meeting with “Bro” in order to pick up the heroin, which BETHEA would then sell to the UCE. The UCE also observed BETHEA place a call on a cellular phone, and overheard BETHEA refer to the female on the other line as “Sis.” During the drive, the UCE asked BETHEA where they were going, and BETHEA advised that they were going to “Bert’s,” and directed the UCE to Bert’s Steaks and Subs (hereinafter “Bert’s”), located at 700 Haddon Avenue, Camden. The UCE parked the vehicle near Bert’s, and the UCE overheard BETHEA use a cellular phone to advise “Bro” that he had arrived. BETHEA exited the UCE’s vehicle, then shortly thereafter reentered the rear passenger side of the UCE’s vehicle, reached into his front pants pocket and produced a clear plastic bag containing a tan powder substance. BETHEA told the UCE that there was only “50” in the bag; *i.e.*, 50 grams of heroin, and that the cost would be \$80 per gram. The UCE then counted out and handed BETHEA \$4,000 in U.S. currency in exchange for the bag. BETHEA counted the cash, placed a portion of it in his pocket, then exited the UCE’s vehicle with the balance of the cash. At approximately 3:04 p.m., surveillance officers observed BETHEA meet JONES, who standing outside the main entrance to Bert’s, then observed the two men enter Bert’s, where they each purchased a drink. BETHEA then handed JONES an unknown amount of cash, and the two exited Bert’s at approximately 3:06 p.m. Shortly thereafter, BETHEA reentered the UCE’s vehicle with his drink and directed the UCE to drive him back to the East Camden area. At about the same time that BETHEA entered the UCE’s vehicle, JONES entered a black Chevrolet Impala, and both vehicles departed. The contents of the sandwich bag subsequently field-tested positive for heroin. This transaction between the UCE and BETHEA was also audio recorded and

observed by surveillance units.

12. A review of intercepted conversations during this period on August 18, 2014 further establishes the roles of BETHEA, JONES, ERICA FLEETWOOD and WENDELL FLEETWOOD in this transaction. At approximately 2:42 p.m., BETHEA used the Third Bethea Facility/cellular telephone (856) 655-5369 to call JONES at (650) 384-3422, a cellular telephone used by JONES, which was intercepted and recorded. The conversation was transcribed as follows:

BJ: Yo.
WB: Yo, Bro.
BJ: What's up, Bro?
WB: See if you can grab something like right right now for me yo.
BJ: Alright, I'm still waiting for let me call this nigga real quick. 'Cause I . . .
WB: I need it, I need it like right now like I got these niggas with me like right now.
BJ: Alright, alright, alright, alright, alright.
WB: Alright.
BJ: Give me like ten minutes, where you at?
WB: I'm out East, Bro.
BJ: Alright.
WB: I ain't trying to wait ten minutes Bro I'm a come to you.
BJ: Alright just meet me at, meet me at Bert's. On Haddon.
WB: Bert's, Bert's, Bert's.
BJ: The little, the, uh, cheesesteaks place.
WB: Yeah wha, you ain't around Bro?
BJ: Nah.
WB: Text me his number his work number that Philly number I had a Philly number for him.
BJ: I don't got no number for him, he be calling Sis and them and shit like that.
WB: Alright, you gonna grab it and meet me there at the steak house?
BJ: Yeah, you know what I'm talking about right?
WB: Yeah, on like Haddon or something right?
BJ: Yeah, it's on Haddon.
WB: Alright, here I come.
BJ: Alright.

13. Based on my training and experience, as well as what I have learned during the course of this investigation, it is my belief that BETHEA and JONES engaged in a coded drug conversation. It is my belief that BETHEA used the Third Bethea Facility/cellular telephone facility (856) 655-5369 and called JONES to ask JONES to bring heroin to BETHEA, for the purpose of selling it to the UCE. Specifically, when BETHEA said “*See if you can grab something like right right now for me yo,*” it is my belief that BETHEA was asking JONES to obtain heroin immediately because BETHEA had a pending narcotics sale. Since the UCE had just contacted BETHEA for the purpose of purchasing heroin, I believe BETHEA’s request for JONES to “grab something” was a reference to heroin. When, JONES then responded, “*Alright, I’m still waiting for let me call this nigga real quick. ‘Cause I..*” it is my belief that JONES wanted to fulfil BETHEA’s order for heroin but first had to contact JONES’ source of supply (“SOS”) to ensure that the order could be filled. When BETHEA responded, “*I need it, I need it like right now like I got these niggas with me like right now,*” it further supports my belief that BETHEA was waiting to fulfil the UCE’s request to purchase heroin, since BETHEA was aware that the UCE wanted to purchase heroin and that the UCE was in close proximity to BETHEA. Later in the conversation when BETHEA said, “*Text me his number his work number that Philly number I had a Philly number for him.*” and when JONES responded, “*I don’t got no number for him, he be calling Sis and them and shit like that,*” I believe that BETHEA was rushing to fulfill the UCE’s heroin order and was asking JONES to provide him with the telephone number of JONES’ SOS so that BETHEA could attempt to speed up facilitation of a drug transaction. I further believe, based on previous calls and intelligence, that JONES’ SOS is WENDELL FLEETWOOD. When JONES stated that he did not have a number for “*him,*” JONES was

advising BETHEA that JONES did not have WENDELL FLEETWOOD's telephone number. JONES further advised BETHEA that "*he,*" WENDELL FLEETWOOD, "*be calling Sis,*" which I believe to mean that WENDELL FLEETWOOD was communicating via cellular telephone with his sister, whom investigators know to be ERICA FLEETWOOD.

14. On August 18, 2014, at approximately 2:44 p.m., BETHEA used the Third Bethea Facility/cellular telephone (856) 655-5369 to call Erica Fleetwood facility/cellular telephone (856) 381-2587, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

EF: Yes
WB: Yo Sis.
EF: What's up?
WB: Um can you give Bro a call for me it's important.
EF: Um what, [inaudible by WB] and say what, 'cause he not around.
WB: Nah, tell him I need 50 shirts by um, um tell him I need it at 70 though.
EF: Alright.
WB: But I need it right now. Tell him [Call Waiting beep] I need 50 for 70.
EF: Alright.
WB: Alright.

15. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ERICA FLEETWOOD. I believe that in the beginning of the conversation BETHEA asked ERICA FLEETWOOD to call "*Bro*" for him because it was "*important.*" In the conversation discussed in the previous paragraph, BETHEA wanted to talk to JONES' SOS, WENDELL FLEETWOOD, and BETHEA learned from JONES that "*Sis*" had WENDELL FLEETWOOD's telephone number. Here, in the call which immediately followed, BETHEA spoke with a female whom he addressed as "*Sis,*" and asked her to call "*Bro.*" I therefore believe that BETHEA was

speaking to ERICA FLEETWOOD, WENDELL FLEETWOOD's sister. Moreover, I believe that BETHEA referred to WENDELL FLEETWOOD as "Bro," which is a logical assumption based upon the fact that I believe that BETHEA was speaking with WENDELL FLEETWOOD's sister. When ERICA FLEETWOOD subsequently asked BETHEA, "*and say what 'cause he not around,*" she was advising BETHEA that WENDELL FLEETWOOD was not available, but she nonetheless wanted to know what BETHEA wanted to tell WENDELL FLEETWOOD, so that she could pass on the information to WENDELL FLEETWOOD. BETHEA then stated, "*Nah, tell him I need 50 shirts by um, um, tell him I need it at 70 though.*" In this statement I believe that when BETHEA referred to "50 shirts," but "at 70," he was requesting to purchase 50 grams of heroin from WENDELL FLEETWOOD at 70 dollars per gram. ERICA FLEETWOOD responded, "*Alright,*" indicating that she intended to contact WENDELL FLEETWOOD. BETHEA then reiterated to ERICA FLEETWOOD, "*But I need it right now. Tell him [Call Waiting beep] I need 50 for 70,*" and she again acknowledged BETHEA's request by saying "*Alright.*"

16. At approximately 2:52 p.m. BETHEA placed a call via the Third Bethea Facility/cellular telephone (856) 655-5369 to cellular telephone (650) 384-3422, used by JONES, which was intercepted and recorded. BETHEA asked JONES if JONES was at Bert's, to which JONES replied that he would be there in five minutes.

17. At approximately 2:53 p.m. BETHEA received a call via the Third Bethea Facility/cellular telephone (856) 655-5369 from cellular telephone (650) 384-3422, used by JONES, which was intercepted and recorded. JONES asked BETHEA, "it's 50, right" and BETHEA replied in the affirmative.

18. At approximately 2:55 p.m. BETHEA received a call via the Third Bethea Facility/cellular telephone (856) 655-5369 from the Erica Fleetwood facility/cellular telephone (856) 381-2587, which was intercepted and recorded. In the conversation, BETHEA greeted ERICA FLEETWOOD as “Sis,” who informed BETHEA that “they coming.” When BETHEA asked ERICA FLEETWOOD, “What he say?,” she replied “He ain’t picked up, I text him,” and told BETHEA that she was about to contact WENDELL FLEETWOOD. BETHEA replied, “Yeah, please.”

19. At approximately 3:06 p.m., BETHEA received a call on the Third Bethea Facility/cellular telephone (856) 655-5369 from (267) 707-3111, a telephone number which the investigation established was used by WENDELL FLEETWOOD to communicate with BETHEA. WENDELL FLEETWOOD asked BETHEA if anything was wrong, and BETHEA replied that everything was good. BETHEA asked WENDELL FLEETWOOD if he had spoken to Sis, to which WENDELL FLEETWOOD replied, “Just call me.” BETHEA told WENDELL FLEETWOOD that he was going to text him. At approximately 3:08 p.m., BETHEA texted (267) 707-3111, “I need 50 shirts but I need em for the 70.”

August 22, 2014 Undercover Purchase of 100 Grams of Heroin and Two Firearms

20. On August 21, 2014, at approximately 12:12 p.m., via the Third Bethea Facility/cellular telephone (856) 655-5369, BETHEA received an incoming call from a telephone facility used by the UCE, which was intercepted and recorded. BETHEA and the UCE engaged in a conversation in which the UCE asked BETHEA if he could “double up” on the other day, meaning purchase 100 grams of heroin instead of 50, and if BETHEA could give him a better price. BETHEA agreed on a price of \$75 per gram for the 100 grams and also agreed to sell the

UCE a firearm for \$800. They agreed to conduct the transaction the next day, August 22, 2014.

21. On August 21, 2014, at approximately 11:25 p.m., BETHEA used the Third Bethea Facility/cellular telephone (856) 655-5369 to call a telephone facility used by the UCE, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

UC: Hello.
WB: Yo.
UC: Yo what's up homie?
WB: Nuttin, ah what time you tryin' to come down here [UI].
UC: Say what again?
WB: I said what time you tryin' to come down here [UI].
UC: I can't hear you.
WB: I said what time are you tryin' to come down tomorrow?
UC: I should probably be done at least by twelve and I'll probably get out by I'll punch out by that time. I'm taking a guess at least by one 'cause I'm gonna go straight straight from work I'm gonna go straight to you.
WB: Aight well um just make sure you got like a set number on whatcha need before you come so I can be ready for you.
UC: Well I'm sayin' you know I'm gonna do I'm gonna get a hundred. Can you do a hundred right?
WB: Yeah aight that's cool.
UC: Yeah it's straight and um and that jawn you got that Tec I'm [UI] you know?
WB: Yeah.
UC: I'm straight with that. I'm just we can rock so I'll.
WB: Aight.
UC: Be up there by then. Aight?
WB: Aight?
UC: Aight good look.

22. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and the UCE. I believe that when BETHEA asked the UCE, "*I said what time you tryin' to come down here,*" BETHEA called the UCE to confirm what time the UCE planned to meet BETHEA to

complete the drug transaction that was agreed to in the earlier call, described in the above paragraph. The UCE responded, *“I’m taking a guess at least by one (1:00 p.m.),”* and BETHEA then said, *“Aight well um just make sure you got like a set number on whatcha need before you come so I can be ready for you,”* which I believe to mean that BETHEA had also called the UCE to confirm the amount of heroin that the UCE intended to purchase. The UCE responded, *“Well I’m sayin’ you know I’m gonna do I’m gonna get a hundred. Can you do a hundred right?”* Here, the UCE again asked if BETHEA could supply the UCE with 100 grams of heroin.

BETHEA confirmed the UCE’s request by answering, *“Yeah aight that’s cool.”* The UCE then asked BETHEA, *“Yeah it’s straight and um and that jawn you got that Tec I’m [UI] you know?”*

I am aware that the UCE’s reference to *“Tec”* is a reference to a Tec-9, which is a term often used by associates of DTOs and gangs to refer to a semi-automatic assault pistol. Here, the UCE is asking if BETHEA can still supply the UCE with the firearm, as discussed previously between the parties and referred to by them as a *“Tec.”* BETHEA responded, *“Yeah,”* thus confirming his intent to also sell the UCE a semi-automatic assault pistol.

23. On August 22, 2014, at approximately 1:00 p.m., investigators initiated surveillance in East Camden in anticipation of the aforementioned drug transaction between BETHEA and the UCE. At approximately 1:27 p.m., BETHEA received an incoming call from the UCE via the Third Bethea Facility/cellular telephone facility (856) 655-5369, which was intercepted and recorded. The UCE advised BETHEA that he was at the 7-11 convenience store. The referenced 7-11 is located at the intersection of Marlton Pike and Federal Street in Camden, which is close to the 113 North 25th Street residence identified by BETHEA as his *“spot.”* Based on prior conversations, BETHEA knew that the UCE was in close proximity to BETHEA

and thus ready to consummate the aforementioned purchase of 100 grams of heroin and a firearm. BETHEA told the UCE that he was on his way and that he was driving a white Malibu.

24. On August 22, 2014, at approximately 1:29 p.m., BETHEA used the Third Bethea Facility/cellular telephone (856) 655-5369 to make an outgoing call to cellular telephone (650) 384-3422, used by JONES, which was intercepted and recorded. The conversation was transcribed as follows:

WB: Yo Bro.
BJ: Yo.
WB: Where you at?
BJ: Out east, what's up nigga?
WB: I need a hundred.
BJ: Uh, I don't think we got it.
WB: No?
BJ: No, hold on one second hold on.
WB: Ah man, please don't tell me that. I just made a nigga like come all the way down here.
BJ: Let me call you back in like five minutes I'm ready to see.
WB: Alright, make sure you call me back I got the nigga like right here with me type shit.
BJ: Alright.
WB: Alright.

25. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded narcotics conversation between BETHEA and JONES, which I have interpreted as follows: BETHEA called JONES to ask JONES to supply him with 100 grams of heroin, which BETHEA would then distribute to the UCE. JONES responded, "*I don't think we got it.*" Here, JONES informed BETHEA that there was not enough heroin to fulfill BETHEA's order. When BETHEA said, "*Alright, make sure you call me back I got the nigga like right here with me type shit,*" BETHEA was telling JONES that his narcotics customer was in close proximity, which further supports the conclusion that the 100

grams of heroin BETHEA was attempting to order from JONES was intended to be sold to the UCE, who was in close proximity to BETHEA at the 7-11. JONES advised that he would check and call BETHEA with a final determination.

26. On August 22, 2014, at approximately 1:33 p.m., BETHEA received an incoming call from cellular telephone (650) 384-3422, used by JONES, via the Third Bethea Facility/cellular telephone (856) 655-5369, which was intercepted and recorded. The conversation was transcribed as follows:

WB: Yo.

BJ: Nope, he ain't answering but I was in there earlier and it wasn't there. There wasn't nothing in it.

WB: At all man? Like I got this nigga like down here bro like right now.

BJ: At all.

WB: Not even like a fucking loose fifty, nothing?

BJ: Nothing.

WB: Alright. Try to call him again bro.

BJ: Alright.

27. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and JONES, which I have interpreted in sum and substance as follows: JONES informed BETHEA that he was unable to supply BETHEA with the 100 grams of heroin. Specifically, when JONES said, "*Nope, he ain't answering but I was in there earlier and it wasn't there,*" JONES was telling BETHEA that JONES had unsuccessfully attempted to contact someone about the heroin, but that person did not answer the phone. Moreover, JONES said that he had physically checked a drug stash location earlier in the day and determined that there was not 100 grams of heroin available for subsequent redistribution by BETHEA. When BETHEA asked, "*Not even like a fucking loose fifty, nothing?,*" Bethea was asking JONES if there was any heroin available,

even 50 grams of heroin in an unpackaged or otherwise “loose” state. I am aware that BETHEA is using the term “loose” to describe heroin that has not yet been prepared or otherwise packaged for subsequent resale. BETHEA then asked JONES to continue to call in the hope that the person would answer the phone and ultimately supply BETHEA with the 100 grams of heroin.

28. On August, 22, 2014, at approximately 1:51 p.m., the UCE and BETHEA met at a restaurant in Camden, New Jersey. BETHEA arrived driving a white Chevrolet Malibu, along with a male he identified as his cousin, and a female. At approximately 1:57 p.m., BETHEA used the Third Bethea Facility/cellular telephone (856) 655-5369 to call the Erica Fleetwood Facility/cellular telephone (856) 381-2587, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

EF: Hello.
WB: Yo, where Bro at?
EF: He just call me, I don't know?
WB: Huh?
EF: I don't know. Want me tell him to call you?
WB: Yeah, call him like right like call me right right now.
EF: All right.
WB: All right.

29. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ERICA FLEETWOOD, which I have interpreted in sum and substance as follows: During this conversation BETHEA asked ERICA FLEETWOOD the whereabouts of “*Bro*,” who, as stated previously, I believe to be WENDELL FLEETWOOD, a source of drug supply for BETHEA. ERICA FLEETWOOD replied that “*He just call me.*” BETHEA confirmed that he wanted “*Bro*” to call him and emphatically told ERICA FLEETWOOD to tell “*Bro*” that he needed to

call BETHEA immediately. It is my belief that BETHEA was trying to fulfill the UCE's order for 100 grams of heroin, and since JONES could not fill BETHEA's request to be supplied with 100 grams of heroin, as discussed above, BETHEA called ERICA FLEETWOOD and requested that she arrange for WENDELL FLEETWOOD to call BETHEA directly for purposes of attempting to obtain from WENDELL FLEETWOOD the 100 grams of heroin, which would subsequently be sold to the UCE.

30. On August 22, 2014, at approximately 2:08 p.m., BETHEA used the Third Bethea Facility/cellular telephone (856) 655-5369 to call the Erica Fleetwood Facility/cellular telephone (856) 381-2587, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: [WB talks to someone in the background while the phone is ringing.]
EF: Hello.
WB: Yo, what happened?
EF: He didn't pick up when I call him, but I did texted. Let me see if he texted me back, hold on.
WB: You said he texted you back?
EF: Um, he said OK.
WB: Alright, tell him, tell him I said like text me right know, like I'm waiting for to text me right now.

31. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ERICA FLEETWOOD, which I have interpreted in sum and substance as follows: When BETHEA asked, "*Yo, what happened?*," BETHEA was inquiring whether ERICA FLEETWOOD had spoken with WENDELL FLEETWOOD pursuant to the previous conversation described above. ERICA FLEETWOOD replied, "*He didn't pick up when I call him, but I did texted. Let me see if he texted me back, hold on.*" Bethea then asked, "*You said*

he texted you back?," to which ERICA FLEETWOOD replied, *"Um he said OK."* During this exchange I believe that ERICA FLEETWOOD advised BETHEA that she did text WENDELL FLEETWOOD some message in reference to BETHEA's request as discussed above, and that WENDELL FLEETWOOD responded to ERICA FLEETWOOD via text message "OK." As a result, BETHEA reiterated to ERICA FLEETWOOD that she needed to tell WENDELL FLEETWOOD to text BETHEA immediately.

32. At approximately 2:15 p.m., BETHEA and the UCE left the restaurant, drove to North 25th Street and parked in front of 113 North 25th Street, which BETHEA pointed out as his family's. While BETHEA and the UCE sat in the UCE's vehicle, the UCE overheard BETHEA contacting an alternate source of supply via cellular phone, and intercepted calls and surveillance confirmed that BETHEA was able to acquire from that other source of supply the 100 grams of heroin. BETHEA exited the UCE's vehicle for a few minutes, after which BETHEA re-entered the UCE's vehicle, reached into his pants pocket and removed a large clear plastic bag containing a beige powdery substance, which he handed to the UCE. The UCE handed BETHEA \$7,500 in U.S. currency in a brown paper bag as payment for the heroin, after which BETHEA exited the UCE's vehicle with the bag containing the \$7,500 and entered the residence at 113 North 25th Street.

33. After several minutes, BETHEA exited 113 North 25th Street without the paper bag of money and re-entered the UCE's vehicle. The UCE overheard BETHEA using a cellular telephone to speak with the cousin who had arrived with BETHEA at the restaurant. While in the restaurant, BETHEA had given the keys to the white Chevrolet Malibu to his cousin and directed him to drive to one of BETHEA's residences to retrieve firearms to sell to the UCE. At

approximately 2:30 p.m., BETHEA received a call from his cousin via the Third Bethea Facility/cellular telephone (856) 655-5369 in which BETHEA instructed his cousin to search through a container of firearms for guns to sell to the UCE. The pertinent portion of that conversation between BETHEA and his cousin (abbreviated as "BC" in below) was transcribed as follows:

WB: Yo.
BC: Yo, bro.
WB: Yo.
BC: Aight, now uh, I just got to your house.
WB: Umm, go in my room.
BC: Yeah.
WB: The big, the big flat screen and like the, the one that you keep going straight to the back.
BC: The one straight, the one that's straight to the back, right?
WB: Go all the way at that last bottom drawer, you gotta take them clothes out.
BC: Aight, got you [UI] you got a bag so I can put it in?
WB: Yeah, it's like, it's like six jawns in there, so you gonna have to move them. It's like two big ones in there. Grab the one I told you.
BC: Bitch you ain't got no light in here? [UI] Where is your light, this shit dark as hell in your room.
[Bethea heard speaking in the background, "Alright, I got you."]
WB: Hello.
BC: Yeah.
WB: Yup. You got it?
BC: I'm movin', you said the big one right, the big one, all the way to the back wall.
WB: Yeah.
BC: Alright.
WB: But it's two down there though bro.
BC: Yeah, the one that got a whole bunch of DVDs to my left.
WB: It's the one that got what?
BC: It's, I am right here next to your closet, you talking about the TV next to your closet in you room right?
WB: Yep, but you gotta take the clothes off bro, you gotta take it out. Or you ain't gonna be able to get to it.
BC: The dresser ain't open all the way up though.
WB: I know, that's why you gotta take the clothes out nigga.
BC: Aight.
WB: If you listen to me, I'ma make it easy for you nigga.

BC: I am taking the clothes out now.
WB: Aight.
BC: You said it's two of them down here, there's a shotgun.
WB: No, not that, the other one.
BC: I know, you talk, you said the "K" right?
WB: Yeah, grab that.
BC: Alright.
WB: Alright hold on.
BC: These, these, these.
WB: Uh.
BC: Aight, I got it, I got the "K."
WB: You got it?
BC: Yeah I got it.
WB: There should be like an "11" in there, it should be like an "11" in there too.
BC: Yeah what the hell does it look like, "11" is the big black one right?
WB: No, that's, it's two of them, one is a "10" and one is a "11," one hold 4 pounds and one hold 9 and get the one that hold 9.
BC: Bitch I am trying to figure which one is it.
WB: Pull it out and look at the barrel nigga that's how you gonna know the difference.
BC: The barrel long?
WB: Nah bro, look on the side bro, look on the side of the jawn. It's going to say 9-M-M on there bro.
BC: Aight, yeah, yeah, I am looking now.
WB: You looking at it?
BC: Yeah, these two not it, I am about to get the other one. Alright I got it.
WB: What does it say on there, look what it say on there because you might have grabbed the wrong thing bro, because one of them is a Uzi bro. I don't want you to bring that, that's not it.
BC: Nah, yeah, the Uzi say 45 on there.
WB: Huh?
BC: The Uzi say 45 on there.
WB: Aight, leave that.
BC: Yeah I know, I am leaving that, yeah.
WB: What I am telling you, look just like that.
BC: Yeah, but it's small yeah, I got it. I know which one you are talking about, I got both of them.
WB: It look just like that bro?
BC: Yeah it look just like that and it say 9-M-M on there.
WB: Aight, yeah grab that.
BC: Ima put the other shit back, I'ma put the other shit back in your draw real quick.
WB: Yeah put everything else back, [UI], [S/L] everything that is out, you can grab.
BC: Yeah, aight, Yo.
WB: Yo.

BC: I was just making sure I got you, I got you on speaker.

WB: Aight, just make sure, 'cause bro we ain't got time for you to grab the wrong thing and gotta run back bro.

BC: I, I promise, I promise I got the right one. I know what you told me to grab. The one that say 9-M-M on there, I know what it is.

WB: But it's two jawns that said 9-M-M, one is a Uzi bro that's what I am telling you. It's black like real real short?

BC: Yeah this one is black and real real short.

WB: Nah that's not it, that's what I am trying to tell you, put that back bro. That's not it.

BC: Aight, I'ma get the other one then aight.

WB: The one that I am telling you, it look exactly like the one that says 4 pounds on there bro. It looked exactly like that.

BC: Aight.

WB: You heard me?

BC: Yeah, I heard you, I got you on speaker, I hear you.

WB: That's what I am telling you, that's not the right one bro. The one that you got it say Uzi on the back of it if you look at it. I ain't talking about that one.

BC: You are talking about the ashy black one, that look rusted.

WB: Yeah that one.

BC: Yeah I got it.

WB: You got it?

BC: Yeah I got it, I got it. I knew which one, I just got shit mixed up. I'll put this shit back.

WB: Aight, now go to my front closet, go to my closet.

BC: Yeah.

WB: Tell me when you get to the closet.

BC: I am right here in the closet now.

WB: Aight, if you go all of the way to your right, it's going to be some Vazquez boxes, but right next to that. It's going to be a Nike box, the first Nike box all of the way at the bottom. It's gonna be like dumb heavy, pull it out.

BC: Yeah I already got it. Oh Shit.

WB: That shit heavy as hell.

BC: Hell yeah, all of the shells in here, now which one which clip.

WB: Now, you, you don't know which one go to the "K" they like long as hell. Big ass curve, like a baby "C" or something.

BC: Yeah I got it.

WB: Make sure 'cause some of them shits go to a AR, so, put it in there and everything.

BC: It's 2 of them, it's 2 of them in here.

WB: It's only one that go to that.

BC: Alright, so I gotta make sure it's the right one.

WB: Yeah, nope, the long shit is straight bro. It ain't that, it ain't that one, it ain't them. Matter of fact, you know where it's gonna be at? If you open the box, it should be all the way to your left bro. You heard?

BC: Yeah, alright I got it. All the way to the left, got it. Got you.

WB: If not, all the other ones is together.

BC: Yeah all the other ones is together, yeah I got you, got it.

WB: Now it's gonna be another one, skinny, like dumb long. That one go to the other jawns you got. Put it in there [ov].

BC: It's right next to it, right [ov].

WB: N, nah, it's probably not. I don't know, put it in there bro. You gotta put it in there and make sure.

BC: God that's not it, it's gonna be two long ones in here.

WB: It's gonna be two long ones, but one of them is for the 45 and the other one is for a 9 [ov].

BC: I got it, it's in there, yeah I got it [ov].

WB: Put it in there, make sure it locked in.

BC: It locked in nigga, you hear it.

WB: Alright, well get a bag. I don't know, it should be a bag probably right where my weight bench at. It should be a bag that you can put both of them shits in. Or you can put them in that red tote, you heard.

BC: Yeah, the red coat?

WB: The tote, the tote that sitting by the bench. That little red bucket man with the top that you can put in there.

BC: Yeah, yeah I can put them in there. It's pink, it's not red nigga.

WB: Pink, red, whatever. Put them in that shit and just throw them in the trunk bro.

BC: Alright, I got you. I am on my way now.

WB: Make sure you lock my door bro.

BC: I got your keys and everything in my pocket.

WB: Aight, man I am on 25th. Hurry up.

BC: Aight.

WB: Aight.

Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded conversation between BETHEA and his cousin, which I interpreted in sum and substance as follows: When his cousin said, "*I just got to your house,*" and BETHEA responded, "*Go in my room,*" I believe that this confirmed that his cousin was at BETHEA's residence. When BETHEA told his cousin, "*it's like six jawns in there,*" I

believe that BETHEA was advising him that there were approximately six firearms at this location. I am aware that the term “*jawn*” is a term commonly used by drug dealers to refer to contraband, to include firearms or drugs. This belief is further supported later in the conversation when BETHEA told his cousin, “Nah bro, look on the side bro, look on the side of the *jawn*. It’s going to say 9-M-M on there bro.” Here, BETHEA said that the “*jawn*” would say “9-M-M” on the side. I am aware that “9mm” is generally a reference to a firearm caliber and that the caliber of a firearm is often located on the side of the firearm. Moreover, BETHEA directed his cousin to retrieve the “K,” which I believe is a reference to an AK-47-style assault rifle. Additionally, once inside the residence, BETHEA’s cousin said that he saw the “*shotgun*,” which is a firearm. Additionally, BETHEA and his cousin used terms such as “10,” and “11,” which I believe is a reference to a Mac-10 and an M11, respectively, which are semi-automatic assault pistols. My belief that firearms were at BETHEA’s residence was subsequently confirmed when BETHEA’s cousin brought from that location an AK-47-style assault rifle and a 9mm Mac-10- style semi-automatic assault pistol to BETHEA, which BETHEA subsequently sold to the UCE.

BETHEA’s cousin returned from the residence approximately twenty minutes after the conversation and arrived on North 25th Street, where BETHEA and the UCE were waiting in the UCE’s vehicle. BETHEA exited the UCE’s vehicle, and after his cousin opened the Malibu’s trunk, BETHEA retrieved a large plastic container from the trunk and re-entered the rear passenger side of the UCE’s vehicle with it. BETHEA opened the container and produced two firearms, which he sold to the UCE: a 7.62x39mm assault rifle, manufactured by CN ROMARM, serial number S174650-2003, fitted with a 30-round magazine, and a 9mm

semi-automatic assault pistol, manufactured by Cobray, model M11, serial number 89-0006620, also fitted with a 30-round magazine. BETHEA charged the UCE \$800 for each firearm, totalling \$1,600. During the time period and in the area in which both the heroin and firearms transactions were conducted, a vehicle known to be operated by JONES was observed conducting what appeared to be countersurveillance efforts on behalf of BETHEA. The drug and firearms transactions between BETHEA and the UCE were both audio and video recorded. The heroin later field-tested positive for heroin.

September 8, 2014 Undercover Purchase of 100 Grams of Heroin

34. On or about September 6, 2014, in a series of text messages and a call via the Fourth Bethea Facility/cellular telephone (609) 221-1133, BETHEA and the UCE discussed another purchase of heroin and the increasing price that BETHEA would be offering per gram. Based on information developed during the investigation that BETHEA and WENDELL FLEETWOOD had previously trafficked in crystallized methamphetamine, also known as “ice,” “glass” or “crystal meth,” the UCE inquired of BETHEA whether BETHEA could obtain it for him. BETHEA responded that “we” used to distribute it, but had not lately owing to a lack of customers.

35. On September 8, 2014, investigators initiated surveillance in Camden in anticipation of a drug transaction between BETHEA and the UCE pursuant to their discussions two days before. At approximately 1:43 p.m., BETHEA received an incoming call from the UCE via the Fourth Bethea Facility/cellular telephone (609) 221-1133, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Yo, bro.

UC: Yo.
WB: What's nigga, what's up with you?
UC: I'm in the hood.
WB: You down here?
UC: Yeah, yeah, I just pulled up to the 7-11.
WB: Alright, alright. What you need?
UC: That, that, same thing, that double up, the 100.
WB: Alright. Give me like, 10 minutes.
UC: What you want me to do? Where you want me to go?
WB: Give me like, you can right, you can go right to my spot, right there.
UC: We good there?
WB: Yeah, yeah.
UC: OK.
WB: Alright.
UC: Alright, I'm gonna swing, I'm gonna swing through.
WB: Alright.
UC: Alright.

36. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and the UCE, which I have interpreted as follows: When BETHEA asked the UCE, "*What you need?*" and the UCE responded, "*That, that, same thing, that double up, the 100,*" the UCE was asking BETHEA if the UCE could purchase 100 grams of heroin, which was the "*same thing,*" meaning the same amount as the last UCE purchase from BETHEA, which occurred on August 22, 2014 and was approximately 100 grams of heroin. BETHEA then confirmed that he could supply the UCE 100 grams of heroin when he replied, "*Alright. Give me like, ten minutes.*" BETHEA then said, "*Give me like, you can right, you can go right to my spot, right there.*" Based on prior interaction between BETHEA and the UCE, the UCE knew that BETHEA was instructing the UCE to wait in the area of North 25th Street near High Street in Camden, specifically in front of 113 North 25th Street.

37. On September 8, 2014, at approximately 1:44 p.m., immediately following the

conversation with the UCE, BETHEA used the Fourth Bethea Facility/cellular telephone (609) 221-1133 to call ERICA FLEETWOOD via the Erica Fleetwood Facility/cellular telephone (856) 381-2587, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Yo, Sis.
EF: What's up?
WB: Call Bro, tell him I need him.
EF: Alright.
WB: Alright. Tell him I need him, like, right now. Alright, alright. Tell him I need to see him for like a hundred dollars.
EF: Alright.
WB: Alright.
[EF hangs up]
WB: Matter of fact, yo.

38. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ERICA FLEETWOOD, which I have interpreted in sum and substance as follows: Upon receiving an order from the UCE for 100 grams of heroin, BETHEA immediately called ERICA FLEETWOOD and asked her to contact "Bro" to "tell him I need him," which I believe indicated that BETHEA needed ERICA FLEETWOOD to contact "Bro," who I, as previously stated, believe to be WENDELL FLEETWOOD. ERICA FLEETWOOD responded, "Alright." BETHEA then advised, "Alright. Tell him I need him, like, right now. Alright, alright. Tell him I need to see him for like a hundred dollars." Here, BETHEA asked ERICA FLEETWOOD to deliver the message to WENDELL FLEETWOOD that BETHEA needed "one hundred dollars." I am aware that the term "one hundred dollars" as expressed in this context and based on the context of the communications, is a coded drug reference that is intended for ERICA

FLEETWOOD to interpret as meaning that BETHEA needed 100 grams of heroin. ERICA FLEETWOOD responded, “*Alright.*”

39. On September 8, 2014, at approximately 1:46 p.m., BETHEA used the Fourth Bethea Facility/cellular telephone (609) 221-1133 to call ERICA FLEETWOOD via the Erica Fleetwood Facility/cellular telephone (856) 381-2587, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Tell him, um, tell um, 50, yo, 50, 50, 50, 50.
EF: Alright. I just told him a hundred dollars. Um.
WB: Alright, it don't matter. What he say? I'll take the 50.
EF: He said alright. He said, and that he want his \$1600. He not fucking playing with you.
WB: Alright, but who I gotta go see, right now?
EF: Him, he said.
WB: Alright, well, where he at?
EF: Bert.
WB: Bert, Bert, Bert. Oh, the food jawn?
EF: Yeah.
WB: Alright. I'm gonna call your phone when I'm right there.
EF: Alright.
WB: Alright.

40. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ERICA FLEETWOOD, which I have interpreted in sum and substance as follows: BETHEA called ERICA FLEETWOOD to tell WENDELL FLEETWOOD to change the order to 50 grams of heroin. ERICA FLEETWOOD told BETHEA that she already told “*him,*” which is a reference to FLEETWOOD, “*a hundred dollars,*” which I, as previously stated, believe to be a coded reference to 100 grams of heroin. BETHEA responded, “*Alright, it don't matter. What he say? I'll take the 50,*” which I believe to mean that BETHEA would take either the full

100-gram delivery from FLEETWOOD, or 50 grams. ERICA FLEETWOOD then said, "*He said alright. He said, and that he want his \$1600. He not fucking playing with you.*" It appeared that ERICA FLEETWOOD was reading WENDELL FLEETWOOD's response to BETHEA, which WENDELL FLEETWOOD texted to a cellular telephone used by ERICA FLEETWOOD. Moreover, WENDELL FLEETWOOD appeared to be sending a message to BETHEA via ERICA FLEETWOOD that WENDELL FLEETWOOD wanted \$1,600 for some unspecified reason. BETHEA then said, "*Alright, but who I gotta go see, right now?*" Fleetwood replied, "*Him, he said,*" which I believe, based on the nature of the call to mean that BETHEA had to go meet WENDELL FLEETWOOD to receive some or all of the heroin that BETHEA intended to sell to the UCE. BETHEA then asked, "*Alright, well, where he at?,*" to which ERICA FLEETWOOD responded that WENDELL FLEETWOOD was at "*Bert,*" which the parties and investigators understood as noted above to be Bert's Steaks & Subs ("Bert's"), located at 700 Haddon Avenue, Camden. BETHEA said, "*Alright. I'm gonna call your phone when I'm right there,*" which meant that BETHEA would contact ERICA FLEETWOOD when he arrived at Bert's, so that ERICA FLEETWOOD could then contact WENDELL FLEETWOOD and coordinate the drug-related meeting between BETHEA and WENDELL FLEETWOOD. ERICA FLEETWOOD responded, "*Alright,*" thus confirming her agreement to assist BETHEA in meeting WENDELL FLEETWOOD. Toll analysis revealed that ERICA FLEETWOOD and WENDELL FLEETWOOD were in contact immediately following this conversation.

41. On September 8, 2014, at approximately 1:51 p.m., BETHEA used the Fourth Bethea Facility/cellular telephone (609) 221-1133 and called ALVARADO via the Alvarado

Facility/cellular telephone (856) 916-7869, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

JA: Yo, bro.
WB: Yo, where are you at?
JA: I'm out Fairview.
WB: I need you nigga.
JA: What you want me to put the, what do you want me to put?
WB: I need you to um, do the shit we did yesterday, I got somebody that want a hundred. Right now.
JA: Yeah?
WB: Yeah hurry up and meet me out East.
JA: Alright. You said meet you out East?
WB: Yeah.
JA: Where at?
WB: Huh?
JA: Where you want me to meet you out East?
WB: Um, where you get the shit from?
JA: Oh, so well, you want me to umm, you got, you got the, you want me to bring that or no?
WB: No, I don't need nothing that you got. I'm about to grab something else.
JA: Aright. Aright, grab something else. You want me to meet you right now?
WB: Yeah, out East, nigga.
JA: Aright, I'm going there, I'm going right now. Alright.

42. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ALVARADO, which I have interpreted in sum and substance as follows: When BETHEA said, *"I need you to um, do the shit we did yesterday I got somebody that want a hundred. Right now,"* BETHEA asked ALVARADO to engage in some type of assistance with selling 100 grams of heroin to a drug customer who was prepared to purchase the drugs *"[r]ight now."* Based on the sequence of calls between the UCE and BETHEA, BETHEA and ERICA FLEETWOOD, and this call between BETHEA and ALVARADO, I believe that BETHEA asked ALVARADO to assist him with selling the UCE 100 grams of heroin. ALVARADO

agreed to help and BETHEA instructed him to come out “*East,*” which I am aware is a reference to an area locally known as “East Camden,” which coincides with the area of North 25th and High Streets, and specifically 113 North 25th Street, which is the location at which BETHEA instructed the UCE to wait for BETHEA. When ALVARADO said, “*Oh, so well, you want me to umm, you got, you got the, you want me to bring that or no?,*” I believe that ALVARADO was asking BETHEA if he needed to bring heroin with him. I have reason to believe this based on my knowledge from prior intercepted communications that BETHEA had recently supplied ALVARADO with heroin and further corroborated by the context of the intercepts, and when BETHEA said, “*No, I don’t need nothing that you got. I’m about to grab something else.*” Here, I believe that BETHEA was referencing his previous call with ERICA FLEETWOOD where he asked her to ask WENDELL FLEETWOOD to supply him with heroin. At this juncture, BETHEA did not need ALVARADO to return any heroin to him to complete the heroin deal with the UCE because BETHEA was “*about to grab something else,*” which I believe to be a reference to the heroin that BETHEA was anticipating would be supplied by WENDELL FLEETWOOD. Later in the conversation ALVARADO asked, “*You want me to meet you right now?,*” to which BETHEA responded, “*Yeah, out East, nigga.*” In an intercepted conversation with ALVARADO approximately three minutes later, BETHEA repeated that he was “about to get new shit now,” referring to the heroin he was expected to be supplied shortly by WENDELL FLEETWOOD.

43. On September 8, 2014, at approximately 2:12 p.m., BETHEA used the Fourth Bethea Facility/cellular telephone (609) 221-1133 to call ALVARADO via the Alvarado Facility/cellular telephone (856) 916-7869, which was intercepted and recorded. The pertinent portion of the

resulting conversation was transcribed as follows:

JA: Be there in three minutes bro, I gotta run to the store and grab the stuff real quick.
WB: Alright.
JA: Alright.
WB: Hey, yo.
JA: Yo.
WB: We are going to need more than twenty though, that's the thing.
JA: Yeah, I just, I'll grab like two of them.
WB: Alright.
JA: Forty.
WB: Alright.

44. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ALAVARADO, which I have interpreted in sum and substance as follows: When ALAVARADO said, "*Be there in three minutes bro, I gotta run to the store and grab the stuff real quick,*" I believe that he was advising BETHEA that he would meet up with BETHEA in approximately three minutes, but first had to go pick up the "*stuff.*" Based on the nature of the call, I believe the term "stuff" means heroin. When BETHEA later said, "*We are going to need more than twenty though, that's the thing,*" Bethea was advising ALVARADO that he needed to bring more than twenty grams of heroin. ALVARADO responded, "*Yeah, I just, I'll grab like two of them...Forty,*" which meant that ALVARADO would grab two prepackaged bags of heroin, each containing approximately twenty grams, totaling forty grams of heroin.

45. During this same time period, BETHEA was communicating with WENDELL FLEETWOOD through ERICA FLEETWOOD to coordinate WENDELL FLEETWOOD and BETHEA's meeting at Bert's. For example, in intercepted phone calls on September 8, 2014 at 2:01 p.m. and 2:09 p.m., respectively, BETHEA called ERICA FLEETWOOD to tell

WENDELL FLEETWOOD that BETHEA was waiting on a little street on the other side of Bert's, and ERICA FLEETWOOD called BETHEA to relay WENDELL FLEETWOOD's message that he was on his way to meet BETHEA at Bert's. On September 8, 2014, at approximately 2:26 p.m., a surveillance unit observed WENDELL FLEETWOOD meet with BETHEA outside of Bert's and hand BETHEA an object. At approximately 3:31 p.m., the UCE and a surveillance unit observed BETHEA meet with ALVARADO on North 25th Street near Howell Street and the two men enter BETHEA's white Chevrolet Malibu, which was parked further down North 25th Street. Immediately after meeting with ALVARADO and exiting the Malibu, BETHEA entered the undercover vehicle, retrieved a clear plastic bag approximately the size of a baseball and containing a beige powder substance from his pants pocket, and handed it to the UCE. In exchange, the UCE handed BETHEA a yellow plastic bag containing \$7,500 in U.S. currency. It is my belief based on the investigation, including surveillance and intercepted calls during this time period between BETHEA and ERICA FLEETWOOD and between BETHEA and ALVARADO, that WENDELL FLEETWOOD provided BETHEA with a quantity of heroin outside of Bert's, and that while inside BETHEA's Malibu approximately an hour later, ALVARADO added some of the heroin that BETHEA had directed ALVARADO to bring to BETHEA to the heroin that WENDELL FLEETWOOD had given to BETHEA in order to make 100 grams, which was then shortly sold to the UCE. In a later intercepted conversation, BETHEA scolded ALVARADO for shortchanging the UCE by two grams because ALVARADO was rushing in the car while transferring the heroin from one bag to another and did not add enough heroin to the bag intended to be sold to the UCE. The approximately 100 grams of heroin purchased from BETHEA during this transaction, which was audio and video recorded,

later field-tested positive for heroin.

September 17, 2014 Undercover Purchase of 100 Grams of Heroin and a Firearm

46. On September 16, 2014, BETHEA and the UCE communicated via text and phone call to arrange another heroin and firearm purchase. On September 17, 2014 at approximately 10:38 a.m., BETHEA received an incoming call from the UCE via the Fourth Bethea Facility/cellular telephone (609) 221-1133, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Yo.
UC: Yo Bro.
WB: What's up?
UC: What's good. Listen, I just took a little break real quick. I'm ah, once I punch out by like twelve.
WB: Yeah.
UC: I'll try to sh...shoot up there straight up to you.
WB: Alright.
UC: Alright? So I'm a, I'm a get that jawn off you and ahh you think we can do ah, the same shit?
WB: Yeah.
UC: You sure, you good?
WB: Yeah I'll be ready, ready for you.
UC: Alright say no more then ah, I'll call you once I hit the road on my way up.
WB: Alright.
UC: Alright.
WB: Alright.
UC: Yo.
WB: Damn.
UC: You, you gonna know know that, you, you.

47. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and the UCE, which I have interpreted in sum and substance as follows: When the UCE said, "*Alright? So I'm a, I'm a get that jawn off you and ahh you think we can do ah, the same shit?*," the UCE

was asking BETHEA if the UCE could purchase a firearm and 100 grams of heroin. Specifically, when the UCE said "jawn," the UCE was referring to a firearm, which BETHEA had previously offered to sell the UCE. I am aware that "jawn" is a term commonly used by drug dealers and those engaged in illicit activity to refer to contraband such as narcotics or weapons. Moreover, the UCE informed me that he/she used "jawn" in this instance as a reference to a firearm. Additionally, when BETHEA told the UCE "*Yeah I'll be ready, ready for you,*" I believe that BETHEA was confirming that he would be able to supply the UCE with the aforementioned 100 grams of heroin and firearm.

48. On September 17, 2014, at approximately 10:41 a.m., immediately following the conversation with the UCE, BETHEA used the Fourth Bethea Facility/cellular telephone (609) 221-1133 to call ERICA FLEETWOOD via the Erica Fleetwood Facility/cellular telephone (856) 381-2587, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

EF: Hello.
WB: Yo.
EF: What up though.
WB: Nothin'. What you doin'?'
EF: Nothin'.
WB: Where you at? In the house?
EF: Who?
WB: You.
EF: I'm 'bout to, I'm leaving the house now, about to go to Ricardo's.
WB: What you about to go to work?
EF: Yeah.
WB: Ah who, who, who there? Where Bro at?
EF: U, I don't even know [UI].
WB: My car still there?
EF: No, he got.
WB: See, ask him, call him, see where he at?
EF: Alright.

WB: Call me right, right back.
EF: Alright.
WB: Alright.

49. Based on my training and experience, as well as what I have learned during the course of this investigation, I have interpreted the above conversation in sum and substance as follows:

BETHEA called ERICA FLEETWOOD to locate WENDELL FLEETWOOD and to relay a message to WENDELL FLEETWOOD via ERICA FLEETWOOD that BETHA was looking for him.

50. On September 17, 2014, at approximately 10:43 a.m., ERICA FLEETWOOD used the Erica Fleetwood Facility/cellular telephone (856) 381-2587 to call WENDELL FLEETWOOD via the Wendell Fleetwood Facility/cellular telephone (678) 559-4932, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WF: Hello.
EF: Good morning.
WF: Wazzup? [UI]
EF: Zy [phonetic spelling] was looking for you.
WF: What?
EF: Naah, she just called. I'll let her know you're not around.
WF: Alright.
EF: Alright, love you.
WF: Love you too.

51. Based on my training and experience, as well as what I have learned during the course of this investigation, I have interpreted the above conversation in sum and substance as follows: I am aware that BETHEA has a female child, who was born in 2010. I am further aware from the investigation, including intercepted communications, that BETHEA has referred to this child as "Zy" (phonetic spelling). I also believe that it is unreasonable to conclude that BETHEA's young child would be attempting to contact WENDELL FLEETWOOD, especially when

considering the context of the intercepts, to include the timing of BETHEA's call to ERICA FLEETWOOD just previous to this call. I also believe, as previously stated, that BETHEA's source of narcotics supply is WENDELL FLEETWOOD. Moreover, I am aware that drug dealers will call associates by other names to avoid law enforcement detection. Consequently, when ERICA FLEETWOOD said, "*Zy was looking for you,*" I believe that she was referring to BETHEA in code as "*Zy,*" a juvenile female, and was in fact informing WENDELL FLEETWOOD that BETHEA was attempting to contact him. I further believe this reference to be accurate based on the sequence of calls that followed, which will be discussed in more detail below. Moreover, when WENDELL FLEETWOOD responded, "*Wazzup?*" and "*What?*," it sounded as if ERICA FLEETWOOD's call woke him up. As a result, when ERICA FLEETWOOD said, "*Naah, she just called. I'll let her know you're not around,*" I believe that ERICA FLEETWOOD had decided that she would tell BETHEA that WENDELL FLEETWOOD was "*not around*" or otherwise unavailable.

52. On September 17, 2014, at approximately 10:44 a.m., which directly followed the previous call above, ERICA FLEETWOOD used the Erica Fleetwood Facility/cellular telephone (856) 381-2587 to call BETHEA via the Fourth Bethea Facility/cellular telephone (609) 221-1133, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Hello?
EF: He ain't around, he still in bed.
WB: Shit, little bastard umm, tell him, tell him, where he at, Aj crib?
EF: I guess.
WB: Alright, umm, she there?
EF: She, ah, I don't know if she there or she at work. He ain't say where he was at so I don't know if he there, he just said [UI]

WB: Ask him if she there so I can call her phone if he, if he there.
EF: Huh?
WB: Ask him is he there so I can call her phone if he is.
EF: Alright, I'll ask.
WB: Or just tell him, look, just tell him umm, tell him I need, I need a hundred dollars. Who I got ah, call, see, Little Bro?
EF: Alright.
WB: Alright.

53. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and ERICA FLEETWOOD, which I have interpreted in sum and substance as follows: When ERICA FLEETWOOD said, "*He ain't around he still in bed,*" I believe she was telling BETHEA that WENDELL FLEETWOOD was not available because he was still in bed. I believe this to be true based on the nature of the conversations in the previous call between ERICA FLEETWOOD and WENDELL FLEETWOOD, as discussed above. Since it is my interpretation in the earlier call at 10:43 a.m. that WENDELL FLEETWOOD sounded as if he had just woken up or was otherwise in a tired state, it further supports my belief that ERICA FLEETWOOD is referring to WENDELL FLEETWOOD in this call with BETHEA when she says "*he still in bed.*" Moreover, when BETHEA responded, "*Shit, little bastard umm, tell him, tell him, where he at, Aj crib?.*" I believe that BETHEA was asking ERICA FLEETWOOD if WENDELL FLEETWOOD was at "Aj's" home, or "crib." I am aware through the investigation that WENDELL FLEETWOOD has a girlfriend, hereinafter referred to by her initials "A.D.," to whom WENDELL FLEETWOOD referred as "Aj." Additionally, this reference to A.D. further supports my belief that BETHEA was referring to WENDELL FLEETWOOD in this call, and that BETHEA was asking ERICA FLEETWOOD to determine from A.D. whether WENDELL

FLEETWOOD was with her, in which case BETHEA would call WENDELL FLEETWOOD on A.D.'s phone, another example of the care with which members of the FLEETWOOD DTO used to protect themselves from law enforcement detection. Later, when BETHEA said, "*Or just tell him, look, just tell him umm, tell him I need, I need a hundred dollars. Who I got ah, call, see, Little Bro?*," I believe that BETHEA was telling ERICA FLEETWOOD to advise WENDELL FLEETWOOD that BETHEA needed 100 grams of heroin for subsequent redistribution. When BETHEA says "*one hundred dollars*," I believe that that phrase is code for 100 grams of heroin. I believe this to be true because, as stated previously, and based on the context of the intercepts, it is my belief that narcotics dealers speak in code to communicate drug pertinent information. Moreover, approximately six minutes prior to this communication, the UCE asked BETHEA to supply him with 100 grams of heroin. Additionally, as previously stated, I believe that WENDELL FLEETWOOD supplies BETHEA with narcotics. Finally, when BETHEA asked ERICA FLEETWOOD, "*Who I got ah, call, see, Little Bro?*," I believe that BETHEA was asking ERICA FLEETWOOD to describe to him the manner in which he needed to physically acquire the heroin. Specifically, BETHEA was asking ERICA FLEETWOOD to tell him whom WENDELL FLEETWOOD was directing BETHEA to call or see to acquire the heroin. When BETHEA ended by asking "*Little Bro?*," I believe that he was referring to JONES, a member of the FLEETWOOD DTO believed to deliver narcotics to BETHEA on behalf of WENDELL FLEETWOOD. The investigation determined that JONES was sometimes referred to by the nickname "L'il Bro."

54. On September 17, 2014, at approximately 10:45 a.m., which directly followed the previous call, ERICA FLEETWOOD used the Erica Fleetwood Facility/cellular telephone (856)

381-2587 to call WENDELL FLEETWOOD via the Wendell Fleetwood Facility, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

EF: Sorry to bother you, he, she said she need a hundred dollars so should she just call Chum?
WF: Yeah.
EF: Alright, so.
WF: Chum, Chum phone ain't working but umm.
EF: I got a number for Chum, Chum just called me.
WF: Alright.
EF: So just call Chum and tell her that Zy needs a hundred dollars?
WF: Yeah.
EF: Alright. Alright, I got you. Alright, love you.

55. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between ERICA FLEETWOOD and WENDELL FLEETWOOD, which I have interpreted in sum and substance as follows: When ERICA FLEETWOOD said "*Sorry to bother you, he, she said she need a hundred dollars so should she just call Chum?*," I believe that she was calling WENDELL FLEETWOOD to advise him that BETHEA needed 100 grams of heroin for subsequent redistribution. In the previous call at 10:38 a.m. above, I am aware that the UCE asked BETHEA to supply him with 100 grams of heroin. In the call at 10:41 a.m., BETHEA contacted ERICA FLEETWOOD to ask her to contact WENDELL FLEETWOOD, immediately after which ERICA FLEETWOOD called WENDELL FLEETWOOD at 10:43 a.m. WENDELL FLEETWOOD sounded in that call as if he had just woken up or was otherwise in a tired state. Immediately following that call, ERICA FLEETWOOD called BETHEA and advised him that WENDELL FLEETWOOD was not around and still in bed. BETHEA told her that he needed

her to advise WENDELL FLEETWOOD that BETHEA needed 100 grams of heroin for subsequent redistribution. Here, in the call at 10:45 a.m., which directly followed the previous one, ERICA FLEETWOOD called FLEETWOOD and said “*he, she said she need a hundred dollars,*” which I believe exposed ERICA FLEETWOOD’s unsuccessful attempt to identify BETHEA by a female code name. Here, ERICA FLEETWOOD started the conversation by saying “he,” but then quickly corrected herself and said “she.” Moreover, her reference to “*a hundred dollars*” directly aligned with BETHEA’s request for “*a hundred dollars*” in the previous call. Moreover, it is my belief, based on the nature of the call and investigation to date, that “*Chum*” is the nickname of a Wendell Fleetwood DTO associate who was going to assist with the delivery of the heroin to BETHEA, and who identified himself in an earlier intercepted call to BETHEA as “L’il Bro’s boy,” to which BETHEA replied that he knew who it was. As noted above, the investigation has disclosed that JONES is sometimes referred to as “L’il Bro.” ERICA FLEETWOOD goes on to ask, “*So just call Chum and tell her that Zy needs a hundred dollars?*” Here, it is my belief that ERICA FLEETWOOD is obtaining permission from WENDELL FLEETWOOD to call “Chum”, and tell “Chum” that “Zy” (which I believe, as previously discussed, is a coded reference to BETHEA) needed 100 grams of heroin. WENDELL FLEETWOOD responded, “*Yeah,*” which I believe was confirmation that he authorized ERICA FLEETWOOD to contact “Chum,” an associate of JONES, a/k/a L’il Bro, to tell “Chum” to assist with supplying BETHEA with 100 grams of heroin.

56. On September 17, 2014, at approximately 10:46 a.m., which directly followed the call at 10:45 a.m. above, ERICA FLEETWOOD used the Erica Fleetwood Facility/cellular telephone (856) 381-2587 to call BETHEA via the Fourth Bethea Facility/(609) 221-1133, which was

intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Hello.
EF: Umm, he said yeah, but ahh, his, his phone not on, so you want me to call him and tell him?
WB: Who?
EF: Ahh, Bro.
WB: Yeah I was just about to say I just tried to call that fool he ain't pickin' up.
EF: 'Cause his phone got lost, he lost his phone in Crestbury.
WB: Yeah [UI] how the fuck I'm gonna get in touch with him?
EF: I'm sayin' I could call his nephew. That's what I'm sayin, you want me to call him?
WB: Yeah, alright, tell L'il Bro call me.
EF: On this number?
WB: Yeah.
EF: Aight.
WB: Aight.

57. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between ERICA FLEETWOOD and BETHEA, which I have interpreted in sum and substance as follows: When ERICA FLEETWOOD said, "*Umm, he said yeah,*" I believe that she was confirming with BETHEA that WENDELL FLEETWOOD had authorized the supply of 100 grams of heroin to BETHEA, pursuant to BETHEA's request as previously described above.

58. Later in the day on September 17, 2014, the UCE parked near the 7-11 store in the area of BETHEA's residence, and was directed by BETHEA to park on the 100 block of North 25th Street. The UCE observed BETHEA being dropped off at the corner of North 25th and Howell Streets by a blue BMW, which is registered to BETHEA's girlfriend, referred to hereinafter as by her initials, "A.S." BETHEA then entered 136 North 25th Street. Shortly after BETHEA entered 136 North 25th Street, the UCE observed the same blue BMW park in front of the UCE's

vehicle and ALVARADO exit from it. ALVARADO then looked around and walked up and down North 25th Street in apparent security and countersurveillance efforts while BETHEA was inside 136 North 25th Street, and warned BETHEA about police presence in two intercepted calls. While inside 136 North 25th Street, in an intercepted call at approximately 1:38 p.m. via the Fourth Bethea Facility/(609) 221-1133, BETHEA told the UCE that he was “coming outside now,” and that he had not forgotten that “I owed you that other shit,” meaning that he had added to the 100 grams the extra amount of heroin that BETHEA owed the UCE for what the UCE had been shortchanged by ALVARADO’s sloppiness from the prior heroin purchase on September 8, 2014. BETHEA therefore told the UCE that “it’s 1-0-4” grams, instead of 100 grams. In that same intercepted conversation, when the UCE questioned BETHEA about a car that had just pulled up in front of him, BETHEA asked if the car was a BMW, and when the UCE confirmed that it was, BETHEA assured the UCE, “Nah, that’ my man. He good.” Shortly thereafter, BETHEA exited 136 North 25th Street, holding his front pocket, then entered the UCE’s vehicle. BETHEA removed a clear plastic bag containing a beige rocklike and powder substance and handed it to the UCE. The UCE then handed BETHEA a yellow plastic bag containing \$7,500 in U.S. currency. BETHEA then asked the UCE if he had a bag in which to place the assault rifle. When the UCE replied in the negative, BETHEA said that he would get something from the house, asked for and received from the UCE the \$1,000 for the assault rifle, then exited the UCE vehicle with the cash and entered 113 North 25th Street. After several minutes, BETHEA exited 113 North 25th Street without the bag and asked the UCE to move his car closer to 113 North 25th Street. Shortly after doing so, BETHEA again exited 113 North 25th Street and opened the rear passenger door of the UCE’s vehicle. Immediately thereafter, another individual

exited 113 North 25th Street carrying the assault rifle, which was covered by a black hooded sweatshirt, and handed it to BETHEA, who placed it on the floor of the UCE's vehicle. During this time ALVARADO continued to provide security by scanning the area visually. BETHEA then removed the sweatshirt and detached the magazine to reveal that it was loaded with ammunition. The UCE then left the area. The approximately 102 grams of heroin purchased from BETHEA later field-tested positive for heroin. The assault rifle is a 7.62x39mm AK-47-style assault rifle, manufactured by Maadi, serial number CM07753, and was loaded with eleven 7.62x39mm rounds. The heroin and firearm transactions between BETHEA and the UCE were audio and video recorded.

September 30, 2014 Undercover Purchase of 2.5 Ounces of "Ice" and Firearm

59. As described above, in conversations with BETHEA, the UCE had asked about BETHEA's ability to supply crystallized methamphetamine, also known as "ice," "glass" and "crystal meth." The UCE's inquiry was based upon information developed during the investigation from multiple confidential sources who were corroborated by other investigative steps, that BETHEA and WENDELL FLEETWOOD trafficked in crystallized methamphetamine. Previously, in an intercepted conversation via the Fourth Bethea Facility/cellular telephone (609) 221-1133 between BETHEA and the UCE on September 6, 2014 at approximately 5:43 p.m., when the UCE asked BETHEA if he knew anyone who could obtain "that shit be clear as hell, look like, like broken up glass," BETHEA confirmed, "Yeah I can grab it . . . Yeah we can do that shit. We had it but . . . Yeah we had that shit but really wasn't like weren't too many people that could fuck with it, you feel me." BETHEA then told the UCE, "I'm about to holler at my people and I'm going to be back with you when I see you,"

then asked the UCE, “How much are we talking about though, because how this shit go, like I would have to pay for it first . . . So I ain’t trying to, last time, I ain’t trying to pay for that shit and get stuck with it . . .” The UCE then asked BETHEA for a sample of the methamphetamine, and BETHEA replied, “Alright.” Approximately an hour after that conversation, at 6:08 p.m., BETHEA and WENDELL FLEETWOOD spoke via the Fourth Bethea Facility/cellular telephone (609) 221-1133. In that intercepted conversation, BETHEA asked WENDELL FLEETWOOD, “Remember that glass shit that we had?” WENDELL FLEETWOOD replied, “Yeah, I know what you talking about,” and BETHEA stated, “Yeah, what’s up with that?” WENDELL FLEETWOOD then explained, “It kinda like only way I chilled on it. They like be on my ass about it, but I thought you was still trying to figure your man out.” WENDELL FLEETWOOD also mentioned that “that shit is whenever I want it.” When BETHEA indicated to WENDELL FLEETWOOD that the UCE had some potential customers who were interested in the methamphetamine, and WENDELL FLEETWOOD mentioned a previous methamphetamine customer, BETHEA suggested that the UCE would be a better customer, to which WENDELL FLEETWOOD replied, “Say no more I’m a jump on it.” The two then agreed to arrange a later telephone conversation using “Sis” as the intermediary. Subsequently, in texts between BETHEA and the UCE via the Fourth Bethea Facility/cellular telephone (609) 221-1133 just prior to the UCE’s purchase of 100 grams of heroin from BETHEA on September 8, 2014, the UCE asked BETHEA if BETHEA had the sample of methamphetamine, to which BETHEA replied, “Nah, it’s coming tho.” After the September 8, 2014 controlled purchase of 100 grams of heroin from BETHEA was completed, the UCE again asked BETHEA when he would have the sample, to which BETHEA replied that he would reach out to the UCE once it

arrived.

60. On September 16, 2014 at approximately 12:30 p.m. BETHEA sent a text via the Fourth Bethea Facility/cellular telephone (609) 221-1133 to the UCE, which read simply, “Sup [What’s up?]”. The UCE then called BETHEA on the Fourth Bethea Facility/cellular telephone (609) 221-1133 at approximately 12:31 p.m. and asked him about the methamphetamine, to which BETHEA replied that it had not come in yet; when the UCE asked about the price, BETHEA replied that he would be able to tell the UCE the price soon.

61. On September 22, 2014, at approximately 12:54 p.m., BETHEA sent the UCE a text via the Fourth Bethea Facility/cellular telephone (609) 221-1133 which read, “Got two bitches for sale.” At 12:57 p.m., the UCE called BETHEA via the Fourth Bethea Facility/cellular telephone (609) 221-1133, which was intercepted and recorded. The pertinent portion of the resulting conversation was transcribed as follows:

UC: Yo.
WB: Yo what’s up?
UC: ‘Sup dudey? What’s goin’ on?
WB: Ain’t shit.
UC: Same old, Same old?
WB: Yeah, got two jawns. Tryin’ to get rid of ‘em.
UC: Yeah, yeah what we lookin’ at?
WB: Umm one is a pound, one a four pound and the other one like ahh a Tec.
UC: Hmm. OK. See what you tryin’ to get so I can push that shit down here.
See what’s what.
WB: Umm for the pound, my boy want eight for the pound. And you know for the other jawn, same number.
UC: OK. Now when you sayin’ a pound, what what.
WB: For the full cost.
UC: [UI] Is that a ahhh small shit for my hand?
WB: Yeah it’s a hand jawn. It’s chrome and black.
UC: Aight.
WB: I gotta picture of it.
UC: Aight. Umm.

WB: [UI]
UC: It ain't busted up? It ain't hot or either right?
WB: No it's my boy shit what he tryin'. He ain't (UI) or nuttin'.
UC: Aight so, so eight for each one?
WB: Nah, eight for this jawn. I wanna rap for the Tec.
UC: OK. Let me ahh. If you think the 4-5 good then I'm, I just might wanna try sumthin' like that but I gotta ahh, let me check if homey wanna, wanna play with the Tec.
WB: Aight.
UC: Let me reach out to him and ahh I'll hit you up later on.
WB: Aight.
UC: Yo, what what, anything on that other shit?
WB: No. Actually I'm about to be wit' my boy right now, so I can give you a call back.
UC: Aight do that.
WB: Aight.
UC: Aight.

62. Based on my training and experience, as well as what I have learned during the course of this investigation, I believe that this was a coded drug conversation between BETHEA and the UCE, which I have interpreted in sum and substance as follows: When BETHEA stated, "*Yeah, got two jawns. Tryin' to get rid of 'em,*" I believe that BETHEA was informing the UCE that he had two firearms, which he had also referred to as "bitches" in the text above, that he was trying to sell. I believe this based on the UCE's previous purchase of firearms from BETHEA, which occurred on August 22, 2014 and September 17, 2014. Moreover, as I have previously stated, I am aware that drug dealers use the word "*jawn*" as a reference to contraband such as drugs and firearms. Additionally, later references in the conversation to a "*Tec*" and "*4-5*" support my belief that BETHEA was attempting to sell the UCE firearms because I am aware that the term "*Tec*" is a term used by drug dealers to describe a Tec-9 semi-automatic assault pistol, and that the term "*4-5*" is a term used by drug dealers to describe a .45 caliber handgun. Later in the day BETHEA also texted the UCE a photo of the .45 caliber handgun. A copy of the photo is

maintained in the investigative case file. Later in the conversation, when the UCE asked BETHEA, “*Yo, what what, anything on that other shit?*,” I am aware from prior conversations between the UCE and BETHEA that the UCE was asking if BETHEA had received a supply of crystallized methamphetamine which BETHEA could subsequently sell to the UCE. BETHEA responded, “*No, actually I’m about to be wit’ my boy right now, so I can give you a call back.*” Here, I believe that BETHEA was telling the UCE that he had not received a supply of crystallized methamphetamine, but he would be meeting with his source of crystallized methamphetamine “*right now,*” and would advise the UCE later.

63. At 12:59 p.m., immediately following the above conversation, via the Fourth Bethea Facility/cellular telephone (609) 221-1133, BETHEA called ERICA FLEETWOOD via the Erica Fleetwood Facility and told her “tell Bro to call [A.S.’s] phone, yo,” meaning that BETHEA was instructing ERICA FLEETWOOD to call WENDELL FLEETWOOD on A.S.’s (BETHEA’s girlfriend’s) phone.

64. On September 25, 2014, at approximately 6:49 p.m., the UCE placed a call to BETHEA, which was intercepted. In the conversation, the UCE asked BETHEA whether BETHEA would be able to supply the UCE with “glass,” because the UCE had another source of supply whose prices were high. BETHEA told the UCE he would call him right back. Immediately upon hanging up with the UCE, BETHEA then called JONES, whom BETHEA told to call “Bro” to “ask him what’s up with that glass shit he’s supposed to be grabbing for me.” Consistent with the FLEETWOOD DTO’s *modus operandi* to insulate its members from law enforcement detection by communicating through third parties like ERICA FLEETWOOD, JONES replied that “I always call Sis or one of them and then they have him call me . . .” BETHEA urged

JONES to “[t]ry to get in touch with him for me real quick. Call Sis or one of them,” to which JONES replied, “[t]hey gonna call him.” BETHEA then sent a text to the UCE stating, “Im waitn on da call now.” The next day, on September 26, 2014 at approximately 11:32 a.m., BETHEA asked JONES, “Yo, look, tell him what’s up that ummm, that glass, man?” JONES could then be heard speaking to WENDELL FLEETWOOD, who was in the background, and WENDELL FLEETWOOD replied, “Tell him next week.” JONES, relaying WENDELL FLEETWOOD’s message to BETHEA, repeated, “He said next week. He says next week.” WENDELL FLEETWOOD could then be heard in the background adding, “Or this week,” and “I already placed the order.” Later in the conversation, WENDELL FLEETWOOD told BETHEA that the price of the methamphetamine would be “between um, 13 and 15 . . . for the LB.” Later that day, via a series of intercepted texts and conversations, BETHEA and the UCE negotiated the price of the methamphetamine.

65. On September 29, 2014, at approximately 11:21 a.m., BETHEA texted the UCE the following, which was intercepted, “Yo i nd to get rid of this tec.” As noted above, a “Tec” refers to an assault-style pistol. The UCE responded by text that he was holding on to his money to pay for the methamphetamine, to which BETHEA replied, “Dats here.” Later that evening on September 29, 2014, BETHEA and the UCE participated in an intercepted conversation in which they discussed meeting to conduct the methamphetamine purchase.

66. On September 30, 2014 at approximately 11:25 a.m., BETHEA and the UCE participated in an intercepted conversation in which BETHEA stated that he was ready for the UCE. BETHEA then called the UCE to tell the UCE that BETHEA had a .40 caliber handgun for sale, but the UCE replied that the UCE was trying to hold on to his money for the methamphetamine

purchase later that day, but asked BETHEA to see if he could reduce the price of the gun. In another intercepted phone call at approximately 2:01 p.m., BETHEA and the UCE agreed to meet on North 25th Street; at approximately 2:49 p.m., the UCE called BETHEA to tell him he had arrived there. While waiting, the UCE observed an individual arrive and enter 136 North 25th Street; the UCE identified this individual as BETHEA's cousin, to whom he had been introduced during the August 22, 2014 100-gram heroin purchase, and who BETHEA has dispatched to retrieve the two assault weapons the UCE ultimately purchased from BETHEA that day. Approximately an hour later, BETHEA's white Chevrolet Malibu arrived at the UCE's location. BETHEA exited the driver's seat and WENDELL FLEETWOOD exited the rear driver's side passenger seat. BETHEA reached into the Malibu and retrieved a figurine of an owl, which he carried with him into the UCE's vehicle. WENDELL FLEETWOOD walked across the street and positioned himself on a set of steps, from which he observed BETHEA and the UCE. Once inside the UCE's vehicle, BETHEA told the UCE that "it" was inside the figurine. BETHEA then exited the UCE vehicle and entered 136 North 25th Street, calling to his cousin to follow him inside. WENDELL FLEETWOOD remained on the steps, talking on a cellular telephone. Approximately ten minutes later, BETHEA exited 136 North 25th Street with a large clear plastic bag containing a white substance protruding from his pants pocket. BETHEA entered the UCE vehicle, removed the plastic bag from his pocket and handed it to the UCE, who confirmed that it was crystal methamphetamine. The UCE estimated that the plastic bag contained approximately one pound of crystallized methamphetamine. When BETHEA asked the UCE how much he was willing to buy, the UCE replied that he only had \$2,000 for the methamphetamine and \$800 for the firearm. When the UCE asked BETHEA if BETHEA

would “front” the remaining methamphetamine, BETHEA replied that he would have to ask his “Bro.” BETHEA then exited the undercover vehicle and looked over towards and signaled WENDELL FLEETWOOD. BETHEA then signaled an unidentified individual to give that individual’s cellular phone to WENDELL FLEETWOOD. WENDELL FLEETWOOD took the phone from the individual, and BETHEA entered 136 North 25th Street while speaking on his cellular phone. In an intercepted conversation, BETHEA told WENDELL FLEETWOOD, “I told him. He said the shit looked official. I told him 1250, he said 12.” Several minutes after BETHEA entered 136 North 25th Street, the UCE received an intercepted text from BETHEA advising the UCE that “ma people aint tryinna throw nuffn until they see how u move it.” BETHEA then called the UCE to tell the UCE that his “Bro” or his “people” wanted the UCE to pay up front for whatever amount of methamphetamine the UCE purchased. BETHEA and the UCE then agreed that the UCE would purchase one and half ounces of methamphetamine for \$1,250 an ounce and the .40 caliber Beretta. BETHEA then exited 136 North 25th Street, entered the UCE’s vehicle and handed the UCE a clear plastic bag containing a white/clear rock-like substance, in exchange for which the UCE handed BETHEA \$1880 in U.S. currency. BETHEA then opened the car door and told his cousin to follow in his car, and instructed the UCE to pull away to pick up the Beretta.

67. BETHEA instructed the UCE to drive to the area of 34th and High Streets in Camden, with his cousin following directly behind the UCE’s vehicle, which parked behind the UCE vehicle. BETHEA exited the UCE vehicle and walked behind some row homes on High Street, then re-emerged from one of the row homes facing 34th Street and entered the UCE vehicle. BETHEA then removed a handgun from his waistband, displayed it to the UCE, and removed the

magazine to show the UCE that it contained ammunition. BETHEA wiped down the handgun before placing it into a bag, in exchange for which the UCE handed BETHEA \$800 in U.S. currency. BETHEA then exited the UCE vehicle and entered his cousin's vehicle, which followed the UCE vehicle until North 25th Street. The one and a half ounces of methamphetamine field-tested positive for methamphetamine, and subsequent testing indicated a purity level of 99%. The .40 caliber Beretta Model 90 sold by BETHEA to the UCE bore a defaced serial number and contained four rounds of .40 caliber ammunition. The methamphetamine and firearm transactions between BETHEA and the UCE were audio and video recorded.

68. Investigation further determined that when BETHEA offered to sell the .40 caliber Beretta handgun to the UCE in the morning of September 30, 2014, BETHEA knew that it had been used in a homicide the night before. On the night before, September 29, 2014, at approximately 7:51 p.m., the Camden County Police Department was dispatched to 1256 Thurman Street in Camden for a report of a man shot in the kitchen. When officers arrived on scene, they found the body of Christian Rivera, who had died from multiple gunshot wounds to his face. Investigation determined that Lavonne Hinson, a/k/a "Lenny," a/k/a "Mack," who investigators had previously known to be an associate of BETHEA, had shot Rivera following a dispute inside 1256 Thurman Street, which had recently been Hinson's residence. On September 29, 2014, at approximately 8:13 p.m., Hinson called BETHEA and engaged in an intercepted conversation. The pertinent portion of the resulting conversation was transcribed as follows:

WB: Hello?

LH: Yo. Who this?
WB: You calling my phone who is this?
LH: It's me bro.
WB: Who's me?
LH: Mack, Mack, Mack.
WB: Oh what's up bro?
LH: I just rocked a nigga in my own house, bro.
WB: Huh?
LH: Niggas just ran up in my house I had rocked a nigga in my own house bro I'm like I'm shit out of luck stuck no money no nothing bro and all I got.
WB: Huh?
LH: I just rocked a nigga in my fucking own house bro, I don't have no money no nothing bro! What the fuck is you not understanding bro?
WB: Where you at?
LH: I'm all the way up the highway I'm 'bout to come past, go try to go to Pennsylvania so I can go over Philly.
[Inaudible Background Conversation]
WB: Where you at right now?
UF: [Unintelligible] I coming.
WB: Huh?
UF: I don't need this.
LH: Yo bro, I'm bout to.

69. Intercepted communications between BETHEA, Hinson and another individual establish that BETHEA met Hinson at a particular location later in the evening of September 29, 2014, and that BETHEA harbored Hinson from law enforcement at A.S.'s residence. Immediately after the UCE purchased the .40 caliber Beretta handgun from BETHEA during the afternoon of September 30, 2014, investigators submitted the weapon for ballistics testing, which established that it is the weapon used to murder Christian Rivera. On October 1, 2014, law enforcement officers arrested Lavonne Hinson and on October 2, 2014, Hinson was arraigned in Camden County Superior Court for the murder of Christian Rivera.

70. The four firearms purchased from BETHEA were test-fired and found to be operable and capable of being discharged and, therefore, are firearms within the meaning of Title 18, United

States Code, Section 921(a)(3).

71. CN ROMARM, Cobray, Maadi and Beretta firearms are not manufactured in New Jersey and by virtue of the firearms being present in Camden County, New Jersey, traveled in interstate commerce.