
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 15-3536 (MF)
 :
 v. : Hon. Mark Falk
 :
 JAMES HEENEY and : **CRIMINAL COMPLAINT**
 ROSARIO PALI :
 :

I, Robert Conrad, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Robert Conrad, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on 3/11/15, at Essex County, New Jersey



HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT ONE

From on or about August 29, 2012 through on or about March 14, 2013, in Union County, in the District of New Jersey and elsewhere, defendants

JAMES HEENEY
and
ROSARIO PALI

did knowingly and intentionally conspire and agree with others to distribute 500 grams or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(b)(1)(B)(ii).

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

ATTACHMENT B

I, Robert Conrad, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with law enforcement personnel and other individuals. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular time or date, I am asserting that it took place on or about the time or date alleged.

1. On August 29, 2012, JAMES HEENEY ("HEENEY") met with a confidential source (CS) and two undercover agents (UC-1 and UC-2). During this meeting, which was recorded by law enforcement using a body wire, HEENEY exchanged approximately 150 grams of cocaine with UC-1 for \$4,800. UC-2 then took possession of the cocaine, and left the meeting location to secure the cocaine in an undercover vehicle. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed 152.2 grams.
2. On or about September 20, 2012, HEENEY met UC-1 and UC-2 at a rest area along the Garden State Parkway. This meeting was audio and video recorded by law enforcement. HEENEY handed the UCs a white plastic shopping bag that contained two clear plastic bags both containing cocaine. In exchange, UC-2 paid HEENEY \$8,000 and a quantity of counterfeit goods as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed 200.3 grams.

3. On or about February 22, 2013 UC-1 met HEENEY and ROSARIO PALI ("PALI") at a location in Linden, NJ. During the course of the meeting which was audio recorded, HEENEY and PALI provided UC-2 with a plastic baggie containing a white substance suspected to be cocaine. In exchange, UC-2 provided HEENEY and PALI with \$3,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 100.7 grams cocaine

4. On or about 2/27/2013 UC-2 and a third UC (UC-3) met HEENEY and PALI at the Menlo Park Mall. During the course of the meeting, which was audio recorded, HEENEY and PALI provided the UCs with two plastic bags containing a white substance suspected to be cocaine. The plastic bags were wrapped in a brown paper towel. In exchange, UC-2 provided HEENEY and PALI with \$6,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 197.16 grams.

5. On or about March 14, 2013, UC-2 and UC-3 met HEENEY and PALI at the Menlo Park Mall. During the course of the meeting, which was audio and video recorded, HEENEY and PALI provided the UCs with a clear plastic bag of suspected cocaine. In exchange, UC-2 provided HEENEY and PALI with \$8,000 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 222.59 grams.