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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Mark Falk  
 :  
 v. : Mag. No. 20-1060  
 :  
 RAHJOHN MONTGOMERY : **CRIMINAL COMPLAINT**  
 :

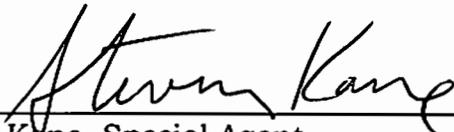
I, Steven Kane, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**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:

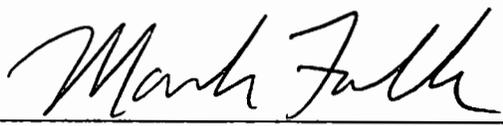
**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

  
\_\_\_\_\_  
Steven Kane, Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed via telephone  
September 14, 2020, New Jersey  
Authorized telephonically pursuant to Fed. R. Crim. P. 4.1

Honorable Mark Falk  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Distribution of Heroin)

During the week of January 27, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHJOHN MONTGOMERY,**

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

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

**COUNT TWO**

(Distribution of Heroin, Fentanyl, and Cocaine)

During the week of June 8, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHJOHN MONTGOMERY,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, a quantity of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

## **ATTACHMENT B**

I, Steven Kane, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement has been investigating Rahjohn Montgomery (“MONTGOMERY”) for the distribution of controlled substances in and around Newark, New Jersey.

2. During the week of January 27, 2020, law enforcement utilized a confidential source (the “CS”) to purchase controlled substances from MONTGOMERY. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached MONTGOMERY and purchased approximately one brick<sup>1</sup> of suspected heroin from MONTGOMERY in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin to law enforcement at an undisclosed location.

3. The suspected heroin was subsequently submitted to a lab which confirmed that the substance was, in fact, heroin.

4. During the week of June 8, 2020, law enforcement utilized the CS to purchase controlled substances from MONTGOMERY. Prior to and after the controlled purchase, law enforcement searched the CS to ensure that he/she did not possess any contraband or unauthorized currency. During the controlled purchase, the CS approached MONTGOMERY and purchased one brick and one additional bundle of suspected heroin and 10 vials of suspected cocaine from MONTGOMERY in exchange for United States currency. The controlled purchase was recorded by video and audio. Following the controlled purchase, the CS turned over the suspected heroin and cocaine to law enforcement at an

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<sup>1</sup> A “brick” commonly refers to approximately fifty single-dose packets, or glassine envelopes, of heroin, often packaged as five “bundles”—the term commonly used to describe a compilation of ten glassine envelopes—grouped together.

undisclosed location.

5. The suspected heroin and cocaine were subsequently submitted to a lab and the results showed that the suspected heroin contained both heroin and fentanyl and confirmed that the substance was cocaine.