

## **AFFIDAVIT IN SUPPORT OF COMPLAINTS**

### **I. INTRODUCTION**

I, Michael Bowman, Special Agent of the Federal Bureau of Investigation ("FBI"), United States Department of Justice, being duly sworn, state as follows:

1. I am a Special Agent with the FBI and have been so employed since August 2012. Since March 2016, I have been assigned to the FBI Philadelphia Division's South Jersey Violent Offender & Gang Task Force ("SJVOGTF"). Before joining the SJVOGTF, I was assigned to the Philadelphia Violent Gang Task Force ("VGTF") for approximately three years and was tasked to investigate violent neighborhood-based gangs with international drug connections. The focus of the SJVOGTF is to identify, disrupt, and dismantle existing and emerging violent criminal enterprises, drug trafficking organizations, and street gangs. Prior to my employment as a Special Agent, I worked as an Intelligence Analyst for the FBI in Washington D.C. for approximately four years. As an analyst, I investigated international and national Hispanic-based gangs including "MS-13" and "18 Street" organizations with direct ties to the United States. My responsibilities included the exploitation of telephone communications to advance investigations into known and unknown gang members engaged in acts of violence.

2. During the course of this investigation, as well as other similar narcotics and related investigations, particularly those related to the drug trade in and around the State of New Jersey, I have become familiar with the methods, terminology, mechanics and modus operandi of drug trafficking organizations; their methods of obtaining controlled substances either from local sources of supply or from sources of supply outside the region; and the corresponding flow of drug proceeds within such organizations and outside of the organization to pay for controlled substances

obtained from sources of supply. I am aware of the measures that drug-trafficking organizations take to distribute controlled substances and exert influence and control within the marketplace for illicit drugs. I have received specialized training in conducting investigations into gang activities and the distribution of controlled substances. As a result of all my training and experience, I am familiar with the means and methods used by drug traffickers to smuggle, import, and distribute controlled substances and to conceal and launder the proceeds from the unlawful sale of controlled substances.

3. I am familiar with the investigative techniques and practices used by law enforcement to investigate and dismantle drug distribution organizations and violent gangs. I have conducted physical and video surveillance, debriefed Confidential Human Sources ("CHSs"), participated in the execution of search and arrest warrants, and analyzed telephone toll records and records relating to narcotics trafficking, firearms offenses, and money laundering. I also have participated in investigations during which law enforcement used court-authorized wiretaps under Title III to intercept wire and electronic communications. I have been an Affiant on multiple affidavits seeking and obtaining court authorization to utilize Title III interceptions in connection with previous drug trafficking and violent crime investigations that resulted in the arrest and prosecution of persons engaged in these unlawful activities. I have also worked closely with other agents and task force officers assigned to the SJVOGTF who have experience and expertise in wire and electronic interception.

4. I am one of the agents who has been involved in the investigation that is the subject of this Affidavit. I have personally participated in this investigation, and I am aware of the facts contained herein based upon my own participation in the investigation, my discussions with others

participating in the investigation, and various other sources of information as set forth herein. I make this Affidavit based on personal knowledge derived from my participation in this investigation and on information I believe to be reliable and accurate, including (but not limited to) information from the following sources:

- a. my training and experience investigating drug trafficking offenses and the training and experience of colleagues with whom I am working on this investigation;
- a. oral and written reports, and documents relating to this investigation that I have obtained and received from members of the FBI and other law enforcement officers<sup>1</sup>;
- b. discussions I have had concerning this investigation with experienced narcotics investigators and other law enforcement officers;
- c. physical surveillance and video surveillance conducted by the FBI and local law enforcement agencies, the results of which have been reported to me either directly or indirectly;
- d. public records;
- e. telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- f. statements of confidential sources, including CHSs<sup>2</sup>;

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<sup>1</sup> Throughout the course of this investigation, the FBI has made use of the knowledge and experience of various local law enforcement officers, including local Camden police officers, detectives, intelligence officers, and Task Force Officers, who are familiar with the history of drug-trafficking in and around Camden and, in particular, who are familiar with some of the members of the DTO discussed herein. These law enforcement officers have relied on their experience and expertise to confirm the identities of DTO members through voice recognition, well known usage of aliases, Confidential Human Sources, surveillance activities in conjunction with intercepted communications over cellular telephones, telephone toll records, birthdates, and other sources and methods.

<sup>2</sup> Over the course of this investigation, law enforcement obtained information from eleven (11) different CHSs. Law enforcement believes that the information provided by the CHSs, as described herein, was reliable. That being said, three of the eleven CHSs were discontinued

- g. consensually-recorded phone calls or text messages;
- h. controlled purchases of cocaine powder, cocaine base, heroin, and fentanyl, and covert audio and/or video recordings made in connection with these operations; and
- i. court-authorized Title III interceptions of wire and electronic communications of various cellular telephones used by suspects in the drug-trafficking organization (“DTO”) described herein. Specifically, over the course of this investigation, court authorization was obtained to intercept wire and/or electronic communications, including GPS location data, over nine (9) different cellular telephones (i.e., “Target Telephones 1, 2, 3, 4, 5, 6, 7, 8, and 9”).<sup>3</sup>

5. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part. When describing conversations or text messages, unless otherwise noted, I have provided a summary of those communications. When providing transcriptions of conversations, I or another agent have listened to the conversation and provided a substantially verbatim transcript of the conversation, accounting for the fact that the final transcripts of these conversations may contain minor edits for syntax or language, which would not bear on the overall substance or meaning of the conversation, as I have reported and transcribed it herein. For reference, I have abbreviated the names of speakers in transcribed conversations using initials or other means of identification. In some instances, I have included comments and abbreviations in

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from active use by law enforcement due to ongoing substance abuse problems, unauthorized criminal activity, and in one case, because the CHS was no longer in a position to receive and provide information on the DTO. Also, one or more of the CHSs have been admonished about unauthorized criminal activity.

<sup>3</sup> Although law enforcement obtained judicial authority to intercepted wire and/or electronic communications over all nine of the Target Telephones, law enforcement did not actually intercept communications over all of the Target Telephones. Specifically, court authorization was obtained to intercept wire and/or electronic communications over Target Telephones 3, 6 and 8, but no completed calls or text messages were actually intercepted over these cellular telephones. To the extent that any raw packet data was intercepted on these cellular telephones, such data was sealed in accordance with the required sealing procedures.

brackets for clarification (i.e., “U/I” for unintelligible speech; “S/L” for sounds like). In addition, where amounts are set forth in this Affidavit, they are set forth as approximations. Similarly, dates and times are approximations, and should be read as on about, in about, or at about the date or time provided.

## **II. PURPOSE OF AFFIDAVIT**

6. This Affidavit is submitted for the limited purpose of setting forth probable cause for the issuance of the requested complaints and arrest warrants. For that reason, I have not included every fact known to me regarding this investigation. Rather, I have set forth only those facts which I believe are necessary to establish probable cause to support issuance of the requested complaints and arrest warrants.

## **III. SUMMARY**

### **A. BACKGROUND OF INVESTIGATION**

7. **Beginning of investigation.** In approximately November 2016, I and other investigators initiated a federal investigation into the unlawful drug distribution activities of a drug trafficking organization (“DTO”), which operates in and around Camden, New Jersey and is engaged in the illicit distribution of controlled substances, including heroin, fentanyl, cocaine and cocaine base (“crack cocaine”). Through various investigative measures described throughout this Affidavit, I and other members of the investigative team have determined that this DTO controls the distribution of drugs on and around the 400-500 blocks of Pine Street, and previously controlled the distribution of drugs on and around the 1900 block of Filmore Street in Camden, New Jersey. Historically, these two areas have been the location of concentrated drug activity and the scenes of shootings and other acts of violence. Additionally, the co-conspirators have distributed drugs

at other locations, in addition to these city blocks, and have arranged drug transactions over the telephone. On April 14, 2017, there was a shooting at the corner of Filmore and Jefferson Streets. One victim of the shooting was killed, while another received a gunshot wound to his neck but ultimately survived the shooting. This shooting took place less than a block away from the DTO's drug trafficking set (an open air illegal drug market), on the 1900 block of Filmore Street, and according to CHSs that provided information to the FBI and local law enforcement, the shooting was over a dispute regarding drug trafficking territory in that geographic area. No one has been arrested for this murder and aggravated assault on the two victims. After this shooting, Camden County Metro Police significantly increased their visible patrol presence in the area, to the point that it affected the ability of the group to effectively and profitably sell narcotics from that block. In the Spring of 2017, after the shooting described above and the increased law enforcement presence in the area, agents noticed that individuals who had been involved in drug distribution on the 1900 block of Filmore Street were now distributing narcotics in the 400-500 blocks of Pine Street in Camden on a daily basis. Information provided to the FBI by CHSs indicates that the DTO has used and continues to use violence to control the distribution of drugs on and around these two locations in the city of Camden.

8. As set forth in greater detail herein, investigators have determined that the DTO members are actively engaged in drug-trafficking in the 400-500 blocks of Pine Street in Camden. In making these determinations, investigators have used techniques including, but not limited to, interviews of CHSs, consensual recordings of meetings and conversations, controlled drug purchases, toll and phone record analyses, deployment of a GPS vehicle tracking device, use of pen register/trap and trace devices, physical and video surveillance, and Title III interceptions and

recordings of wire and electronic communications as described herein.

9. **DTO members discussed herein: roles and responsibilities.** The DTO members work together in a multi-layered organizational structure, with individual DTO members having different roles, responsibilities, and connections within the DTO. Typically, and as described further herein, the higher DTO members supply the lower-level DTO members with drugs for further distribution on and around the 400-500 blocks of Pine Street. This supply typically is handled in twice-daily drug “shifts,” though practices vary over time. As the drugs are sold or passed downstream within the DTO to drug customers, the resulting drug proceeds are then passed back up the DTO hierarchy.

10. At the lowest levels of the DTO are drug set workers, such as **JOSE AGRON, ELISA RIVERA, JASMIN VELEZ, DWIGHT WILLIAMS, KALIEL JOHNSON, WILLIAM CARRILLO, MEYLIN TRONCOSO, WALDEMAR GARCIA, NAEEM SADLER** and **JAMEEL BYNG**. Typically, drug set workers sell street-level drug quantities to the ultimate customers of the drugs. Set workers also contact their shift managers in order to provide them with the proceeds from the drugs that are sold on the drug set, so that those proceeds can be passed up the hierarchy of the DTO. Set workers also contact their shift managers in order to obtain more drugs, so that they may sell these drugs to customers on the drug set. Hierarchically above the set workers are shift managers such as **CHRISTOPHER VAZQUEZ** and **JOSE DIAZ**. The shift managers supervise the set workers, provide the set workers with drugs for distribution to customers, and obtain the DTO’s drug proceeds from the set workers. They also contact the “runners,” or managers, when they need additional drug supply for their set workers. Hierarchically above the shift managers are “runners,” or managers, such as **JUAN FIGUEROA**

and **PAUL SALCEDO**. Runners obtain drugs from the higher-level distributors and packagers within the DTO, and then provide those drugs downstream to shift managers, for further organization and distribution by the lower levels of the DTO. “Runners” also collect drug proceeds from shift managers and provide that money to high-level members of the DTO such as **RONNIE LOPEZ**. Hierarchically above the “runners” are the distributors and packagers such as **CARLOS PEREZ** and **NELSON SALCEDO**. Their role is to obtain drugs from **RONNIE LOPEZ** and others, and to prepare and package the drugs for distribution downstream. Within the DTO, **CARLOS PEREZ** primarily is responsible for cooking and packaging crack cocaine, while **NELSON SALCEDO** primarily is responsible for packaging the powder cocaine.

11. Although the DTO members have different roles and responsibilities, the investigation of the DTO reflects that the hierarchical structure of the DTO is not a rigid structure. The DTO members are interconnected in various ways and enjoy open communication channels with one another, such that higher-level DTO members may engage in activities that typically are the jobs of the lower-level DTO members, and vice-versa.

12. For example, on several occasions, **JOSE DIAZ** and **CHRISTOPHER VAZQUEZ** have engaged in hand-to-hand controlled drug transactions with CHSs during this investigation, rather than routing these sales through lower-level DTO set workers. As another example, **JASMIN VELEZ** and **WILLIAM CARRILLO**, who are set workers in the DTO, have been intercepted while having direct conversations about drug-trafficking with **CARLOS PEREZ**. **JASMIN VELEZ** and **WILL CARILLO** have direct contact with higher-level DTO members, such as **CARLOS PEREZ**, even though there are various DTO members situated between them in the DTO hierarchy (i.e., shift managers such as **CHRISTOPHER VASQUEZ**



and **JOSE DIAZ**). Also, certain DTO members may handle additional tasks beyond their official roles and responsibilities within the DTO. For example, **PAUL SALCEDO** is primarily responsible for packaging heroin for the DTO, but he also contracts with individuals like **MEYLIN TRONCOSO** to do this task. **MEYLIN TRONCOSO**, therefore, appears to prepare and package heroin for the DTO in addition to her set worker duties.

13. **DAVID VELEZ** has participated in drug sales to CHSs in the area close to his known residence and the known residence of his brother **RAMON VELEZ**. As discussed herein, in one of the controlled drug purchases **DAVID VELEZ** sold the CHS some drugs whose packaging is marked with the same “5\$” stamp used by the DTO, which is indicative of those drugs being sourced by the DTO and **DAVID VELEZ**’s participation in the drug distribution conspiracy. Like his brother **DAVID VELEZ**, **RAMON VELEZ** has participated in drug sales to CHSs that took place in the area close to his known residence and the known residence of his brother **DAVID VELEZ**.<sup>4</sup> Like his brother **DAVID VELEZ**, **RAMON VELEZ** has participated in drug sales to CHSs that took place in the area close to his known residence and the known residence of his brother **DAVID VELEZ**. In addition, as discussed herein, **RAMON VELEZ** has engaged in hand-to-hand drug sales on the 400-500 block of Pine Street and has discussed drug-trafficking activities with **JOSE DIAZ**.

14. **Family connections.** During the investigation, law enforcement learned that some

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<sup>4</sup> As discussed throughout this Affidavit, specific stamps are often used on drug packaging as a way of signifying where the drugs came from, similar to a hallmark “brand” or trademark. In this case, law enforcement believes that the use of the “5\$” stamp indicates that the drugs were produced, packaged, and prepared by the DTO, similar to other “5\$” drugs that have been purchased by CHSs from other DTO members over the course of this investigation.

of the DTO members are related to one another. For example, **RONNIE LOPEZ** is the older half-brother of both **NELSON SALCEDO** and **PAUL SALCEDO**.<sup>5</sup> **NELSON SALCEDO** and **PAUL SALCEDO** are full brothers. Additionally, **PAUL SALCEDO** is the youngest of the brothers and **RONNIE LOPEZ** is the eldest of the brothers (hence, the frequent identification of **PAUL SALCEDO** over intercepted communications as “Little Bro” and the frequent identification of **RONNIE LOPEZ** as “Big Bro,” or simply, “Bro”). **CARLOS PEREZ** has been identified as the cousin of all the **SALCEDO** brothers. **RAMON VELEZ** has been identified as the brother of **DAVID VELEZ** and the father of **JOSE DIAZ** and **JASMIN VELEZ**. **JOSE DIAZ** and **JASMIN VELEZ** are siblings. **WILLIAM CARRILLO** has been identified as the uncle of **JOSE DIAZ** and **JASMIN VELEZ**. **CHRISTOPHER VAZQUEZ** has been identified as the cousin of **ELISA RIVERA**.<sup>6</sup>

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<sup>5</sup> From a review of prior court records, law enforcement learned that in **RONNIE LOPEZ**’s prior Drug Enforcement Administration case, discussed herein, **RONNIE LOPEZ** previously informed a court in this District that **PAUL SALCEDO** and **NELSON SALCEDO** were his brothers.

<sup>6</sup> Intercepted communications corroborate these family relationships. For example, there are intercepted calls in which DTO members discuss **JOSE DIAZ**’s “sister,” or “H’s sister,” and/or where DTO members speak to **JOSE DIAZ** about his “little...sister,” and the context of the call makes it clear that the DTO members are talking about **JASMIN VELEZ**.

**JASMIN VELEZ** also is indirectly referred to as **WILLIAM CARRILLO**’s “niece” in intercepted communications. For example, in an intercepted communication over Target Telephone 5 on September 3, 2018, **CARLOS PEREZ** spoke to **WILLIAM CARRILLO** and asked about **WILLIAM CARRILLO**’s “niece” as follows: “So you mean to tell me, J, your niece, your niece got it but she comes out at 2?” In the context of this case, I understand that “J,” or **WILLIAM CARRILLO**’s “niece,” is **JASMIN VELEZ**, who works the afternoon shift of the DTO and therefore likely would “come out” to the drug set “at 2” p.m.

Similarly, there are calls in which **JOSE DIAZ** refers to **RAMON VELEZ** as “Pop” and “Dad,” and there are calls in which **JASMIN VELEZ** calls **CHRISTOPHER VAZQUEZ** and **ELISA RIVERA** her “cousin.” And, as described herein, there are various calls in which **PAUL SALCEDO**, **NELSON SALCEDO**, and **RONNIE LOPEZ** refer to one another as “my brother.”

15. **Avoiding and evading law enforcement.** DTO members are quite sensitive to the potential presence of law enforcement, and over the course of the investigation, they often have worked together and used various tactics in an effort to evade detection by law enforcement. One such tactic is to store drugs outside the reach of law enforcement, such as within the DTO members' clothing. For example, according to a CHS, both **CHRISTOPHER VAZQUEZ** and **JOSE AGRON** store heroin in their pants when conducting drug-trafficking activities. This information has been corroborated by information from various other sources. For example, video surveillance from November 29, 2017, reflects that **CHRISTOPHER VAZQUEZ** was in the area of the 400-500 blocks of Pine Street when he removed an item from his pants and then conducted hand-to-hand transactions.

16. In further attempts to avoid detection by law enforcement, the DTO members often "drop" and switch the cellphones and phone numbers that they regularly use to conduct their drug-trafficking activities. This practice frequently has been observed by law enforcement over the course of this investigation, as discussed herein. Further, various intercepted communications reflect that DTO members warn one another about the need to get new cellphones in order to evade law enforcement, and the DTO members often own and use multiple phones at one time in the course of their drug distribution activities.<sup>7</sup>

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Intercepted calls also corroborate the identification of **ELISA RIVERA** as the cousin of **CHRISTOPHER VAZQUEZ**. For example, on August 8, 2018, law enforcement intercepted a conversation between an unknown female and **JASMIN VELEZ** over Target Telephone 2, in which **JASMIN VELEZ** complained that **ELISA RIVERA** was only rising up within the levels of the DTO because **CHRISTOPHER VAZQUEZ** was her "cousin."

<sup>7</sup> Around the end of August 2018, law enforcement learned that, in a likely attempt to evade detection, several members of the DTO's upper-level management had started using telephones operated by the same smaller cellular telephone company, identified herein as

17. For example, in an August 22, 2018 intercepted call from **NELSON SALCEDO** to **CARLOS PEREZ** over Target Telephone 5, **NELSON SALCEDO** told **CARLOS PEREZ** that **NELSON SALCEDO** had “three phones laying around but they need to be paid.”<sup>8</sup> **CARLOS PEREZ** responded, “That’s them trash things, right?”, and **NELSON SALCEDO** replied “Yeah.” **CARLOS PEREZ** then instructed **NELSON SALCEDO**, “You should grab them for you and change the number.” Based on my training and experience, and in the context of this case, I understand that **CARLOS PEREZ** was instructing **NELSON SALCEDO** to switch his telephone number as a way of concealing the DTO’s drug-trafficking activities.

18. The DTO members also take various counter-surveillance measures to avoid detection by law enforcement, and they frequently warn each other about the presence of law enforcement in the area. Many of these warnings have been intercepted on DTO members’ wire and electronic communications during the investigation of the DTO. As one example, the DTO members warned one another about the presence of law enforcement during a June 19, 2018 intercepted communication between **JOSE DIAZ**, using Target Telephone 1, and **DWIGHT WILLIAMS**, using Target Telephone 3, as follows:

JD: Yo.  
DW: Yo, you good?  
JD: Yeah.

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Wireless Company 1. These cellphone numbers begin with a “315” area code. Some of the DTO members who have begun the new 315 area codes are as follows: **RONNIE LOPEZ** ((315) XXX-1083), **PAUL SALCEDO** ((315) XXX-1166), and **CHRISTOPHER VASQUEZ** ((315) XXX-8510). Shortly thereafter, around approximately the mid- to end of September 2018, the investigators began also intercepting **CARLOS PEREZ** ((201) XXX-9323) and **NELSON SALCEDO** ((201) XXX-1545) using Wireless Company 1 telephones with “201” area codes. I believe that the timing of the DTO members’ use of Wireless Company 1 and its corresponding new area codes, reflects additional connections between members of the DTO.

<sup>8</sup> **NELSON SALCEDO** was using **Target Telephone 6** at the time of this interception.

DW: Asheen just texted me, said that they ran down in the alley way.  
JD: Yeah, they been in the alley.  
DW: Alright.

19. In the above exchange, I understand that when **DWIGHT WILLIAMS** and **JOSE DIAZ** use the word “they,” **DWIGHT WILLIAMS** and **JOSE DIAZ** are referring to law enforcement officers. Specifically, I understand that **DWIGHT WILLIAMS** and **JOSE DIAZ** are warning one another of law enforcement’s presence near the DTO’s drug set.

20. As another way of evading law enforcement, the DTO members have spoken in coded language about their drug-trafficking activities. As set forth above, this use of coded language is consistent with what I know about the common practices of illegal drug traffickers. Over the course of this investigation, I have become familiar with the particular coded language used by the DTO and I am aware of various coded words that DTO members use when referring to particular drugs, drug quantities, or drug packaging. For example, members of the Pine Street DTO often have referred to a quarter ounce of crack cocaine as a “Vick,” based on a quarter ounce being equivalent to seven grams, corresponding with the jersey number of Michael Vick, a well-known former NFL quarterback. Also, DTO members regularly have used colors as a method to describe the various types of drugs sold by the organization, which correspond to the color of the packaging material of the particular drug. For example, DTO members have used the term “blue” to refer to heroin, “purple” to refer to crack cocaine, and “red” to refer to powder cocaine. As another way of using coded language, upper-level DTO members frequently have used the first initial of the first name or nickname of various lower-level DTO members when referring to those members. So, for example, DTO members have used “J” is for **JASMIN VELEZ**, “C” is for **CHRISTOPHER VAZQUEZ**, and “H” is for **JOSE DIAZ** aka HOZ.

21. Not all of the DTO's drug-related conversations have been set forth in coded language, however. On several occasions, DTO members have made explicit (non-coded) references to the various illegal drugs being sold by the DTO. For example, on or about October 7, 2018, **RAMON VELEZ** received an incoming call on Target Telephone 7 from an unidentified male, as follows:

RV: Yeah?  
UM: Hey Ray, how you doin'?'  
RV: What's up?  
UM: How much you sell a quarter ounce for?  
RV: Uh...of what?  
UM: Huh?  
RV: Of what?  
UM: Oh! Heroin.  
RV: Of what, [U/I]?  
UM: Heroin.  
RV: Oh, oh ah, it goes by grams and shit. Depending how many grams you want.  
UM: Aights like seven.  
RV: Seven hundred?  
UM: Seven grams.  
RV: Oh, you want seven grams. Uh...I give it to you for, um... 550.  
UM: Huh?  
RV: 550. Aight?  
UM: Aight.  
RV: For when?  
UM: Huh?  
RV: When you want it?  
UM: Um...Now, I guess.  
RV: Give me, um, half an hour.  
UM: OK.  
RV: Aight.  
UM: Aight.  
RV: Aight.

22. As another example, on October 19, 2018, law enforcement intercepted the following text message exchange between a telephone operated by an unidentified individual and Target Telephone 7, used by **RAMON VELEZ**:

UI: Question is your stuff fentanyl  
RV: Mixed  
UI: My girl was just asking me but she needs fentanyl so don't come in test lol

23. Investigators believe that in the above text message exchange, an unidentified individual asked **RAMON VELEZ** about the specific type of drugs he had for sale ("fentanyl") and then expressed that his/her girlfriend ("my girl") wanted to buy some drugs that would not be detected in a drug "test."

24. **Drug quantities.** As described herein, the investigation reflects that the DTO members have conspired to distribute and possess with intent to distribute at least 280 grams of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine ("powder cocaine"), a Schedule II controlled substance; at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

25. **Heroin.** Law enforcement has interviewed a reliable CHS with respect to the drug-trafficking activities of this DTO. During the interview, the CHS was asked about the quantities of heroin distributed at the street level by the DTO. The CHS indicated that in the spring of 2018, the DTO was selling approximately 80 bundles of heroin a day. From various sources of information, including controlled drug purchases and information provided by CHSs, law enforcement is aware that each bundle sold by the DTO in the City of Camden consists of approximately 28-30 individual packets of heroin. The individual packets sell for \$5 each, although buyers may be provided with a few extra packets of heroin (at no extra charge) if they are buying

over a certain amount of packets in one transaction.

26. The CHS reported that at some point during the summer of 2018, the sales of heroin by the DTO in the 400-500 block of Pine Street slowed down, and therefore the volume of heroin that the DTO was distributing dropped during that period of time. The CHS reported that during the slower summer months, the DTO was selling 20-30 bundles of heroin each day. Further, the CHS told investigators that the DTO set workers sell heroin in the area on two different shifts – a morning shift (approximately 6:00 a.m. to approximately 2:00 p.m.) and an afternoon/evening shift (approximately 2:00 p.m. to approximately 10:00 p.m.). This information was confirmed by various intercepted communications pursuant to the wiretap orders discussed herein. Intercepted communications revealed that around August 2018, the DTO began working a third shift of set workers. This third shift was an overnight shift (approximately 10:00 p.m. to sometime in the early morning hours the next day, i.e., 2:00 a.m. to 4:00 a.m.). Video surveillance of the 400-500 blocks of Pine Street in Camden confirms that the DTO's drug sales occur 7 days a week, throughout the year, even on holidays. This video surveillance, along with controlled drug purchase transactions, intercepted communications, and other sources of information, generally corroborate the statements of the CHS.

27. As set forth herein, over the course of the investigation, law enforcement has used CHSs to conduct several controlled purchases of heroin from DTO members. Based on these controlled purchases, law enforcement has determined that each packet of heroin has an approximate, average net weight of 0.03 grams. Assuming that there are 28 packets of heroin per bundle, as set forth above, law enforcement calculates that the net weight of an average bundle of heroin is approximately 0.84 grams. Accordingly, during a slow period of heroin sales, at 20



bundles a day, the DTO distributes – on average – approximately 16.8 grams of heroin a day. In contrast, during a busier period of drug-trafficking activity, at 80 bundles a day, the DTO distributes – on average – approximately 67.2 grams a day. Using the more conservative number of bundles a day (20 bundles) and the more conservative number of packets in a bundle (28 packets), law enforcement calculates that over the course of a one year period, the DTO distributed a minimum of over 6,000 grams (i.e., 6 kilograms) of heroin, by net weight. As described herein, the evidence shows that the DTO has been selling heroin in this area of Camden for approximately 2 years.<sup>9</sup>

28. **Crack cocaine.** In various intercepted communications of **CARLOS PEREZ** with other members and customers of the DTO, some of which are set forth herein, **CARLOS PEREZ** has discussed the crack cocaine that he supplies to the DTO and its customers. The crack cocaine (i.e., cocaine base) is referred to as being “fried” or “deep fried.” In certain intercepted communications, **CARLOS PEREZ** has referred to specific quantities of crack cocaine. For example, **CARLOS PEREZ** has referred to a “deep fried Mike Vick,” which is a reference to 7

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<sup>9</sup> As set forth herein, some of the heroin that the CHSs purchased from DTO members over the course of this investigation also tested positive for the presence of fentanyl.

From various controlled purchases of heroin over the course of this investigation, as well as various arrest reports and other law enforcement reports in the Camden area, law enforcement is aware that there have been several overdose incidents in the Camden area involving heroin and/or fentanyl.

Further, law enforcement has learned that over the course of this investigation, there were 3 non-fatal overdoses and 2 fatal overdoses in the Camden area where the overdose victims were found with quantities of heroin and/or fentanyl that were packaged with the same “black dice” drug stamps described in this Affidavit as the stamps used by the DTO.

Based on these facts, law enforcement believes that the DTO provided heroin and/or fentanyl that contributed to multiple drug overdoses, including fatal overdoses, in the Camden area.

grams of crack cocaine.<sup>10</sup>

29. Based on various intercepted communications, I have determined that between August 22, 2018 and September 3, 2018, **CARLOS PEREZ** supplied another DTO member, **WALDEMAR GARCIA**, with approximately 161 grams of crack cocaine. **CARLOS PEREZ** also has supplied crack cocaine to DTO members **JASMINE VELEZ**, **CHRISTOPHER VASQUEZ**, and **JOSE DIAZ**, to be resold in the area of the 400-500 blocks of Pine Street in Camden. From various intercepted communications and information from CHSs, law enforcement has learned that **CARLOS PEREZ** began supplying the DTO with crack cocaine in June or July 2018; intercepted wire communications between **CARLOS PEREZ** and other DTO members show that the sales of crack cocaine continued into at least October 2018. All told, considering the amounts of crack cocaine that **CARLOS PEREZ** supplied to the DTO and the time period over which he supplied the crack cocaine, the evidence established that the DTO has distributed more than 280 grams of crack cocaine from June 2018 through November 2018.

#### **B. CONTROLLED DRUG PURCHASE TRANSACTIONS**

30. Based on information received from CHSs, in conjunction with intercepted wire and electronic communications as well as surveillance information, I and other investigators believe that the DTO is presently sourcing bulk supplies of heroin, fentanyl, and cocaine from multiple individuals. As part of this investigation, investigators have used multiple CHSs to purchase controlled substances on thirty-nine (39) occasions at the direction of law enforcement and under their supervision. All of these purchases, some of which are described in greater detail herein, were audio and/or video-recorded. The purchases occurred on the following dates:

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<sup>10</sup> Michael Vick was a former NFL quarterback who wore a number "7" jersey.

December 14, 2016; December 21, 2016; December 29, 2016; January 6, 2017; January 11, 2017; February 1, 2017; February 2, 2017; May 4, 2017; May 24, 2017; June 28, 2017; June 30, 2017; July 19, 2017; October 4, 2017; October 6, 2017; October 11, 2017; November 2, 2017; December 8, 2017; December 18, 2017; January 18, 2018; January 24, 2018; February 23, 2018; March 29, 2018; April 12, 2018; May 4, 2018; May 23, 2018; June 25, 2018; June 29, 2018; July 3, 2018; July 16, 2018; August 2, 2018; September 14, 2018; September 26, 2018; October 23, 2018; November 13, 2018 and November 14, 2018.<sup>11</sup> The FBI also has attempted other controlled drug purchases which were unsuccessful due to multiple reasons, including but not limited to drugs being unavailable for purchase at the desired time or law enforcement being detected by members and associates of the DTO.

31. In virtually all of the controlled purchases, the following procedures were used by law enforcement. Prior to and following each controlled purchase, law enforcement searched the CHSs' persons and vehicles for unauthorized money and/or contraband, and in all instances the results were negative. The CHSs were provided official government evidentiary funds for use in making drug purchases during all of the controlled purchases facilitated by the FBI referenced herein. Nearly all of the phone calls to arrange and conduct the controlled buys mentioned herein were conducted in the presence of law enforcement, during which time law enforcement overheard the calls; in addition, nearly all of those phone calls were audio-recorded.<sup>12</sup> Additionally, each

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<sup>11</sup> Some of these dates included more than one controlled purchase transaction.

<sup>12</sup> On occasion, such as when CHSs received unexpected communications from DTO members, the CHSs had unrecorded communications with DTO members regarding the DTO members' drug distribution activities.

controlled purchase was consensually-recorded with the consent of the CHSs obtained during the controlled purchase using covert video and/or audio recording devices.<sup>13</sup> Law enforcement officers also monitored the CHSs during the trip to and from the meet location through physical surveillance and/or video surveillance. On certain occasions, law enforcement also monitored the CHSs over a live audio transmitter. The CHSs did not make any unauthorized stops or interact with other persons while traveling to and from the meetings with DTO members during controlled purchases.

32. The drug exhibits obtained through controlled purchases carried out in the course of this investigation were either sent to a Drug Enforcement Administration (“DEA”) laboratory or to a New Jersey State Police laboratory for testing. For the first several controlled drug transactions of heroin, law enforcement also field-tested the suspected heroin purchased by the CHSs; however, law enforcement stopped field-testing the suspected heroin because of the presence of fentanyl in some of the purchased substances, which were being marketed and sold as heroin. Field-testing of any substances containing fentanyl presents substantial risks to law enforcement as a result of the possibility of exposure to the effects of the controlled substance, which is readily absorbed through the skin or through inadvertent inhalation. For those instances where the suspected heroin was not field-tested, law enforcement visually inspected all suspected heroin obtained through controlled purchases and confirmed that the substances in fact appeared

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<sup>13</sup> In two of the controlled purchases, the consensual recording equipment did not capture the transaction. The transaction was captured on video surveillance, however, and the CHS was debriefed immediately afterwards and provided information to law enforcement that was consistent with what law enforcement knew from other sources of information. The dates of these controlled purchases were August 2, 2018 and September 26, 2018.

to be heroin and/or fentanyl based upon its appearance and packaging as well as the training and experience of law enforcement officers. Testing by the DEA lab has since confirmed that some of the drugs obtained during controlled purchases contained heroin and/or fentanyl.<sup>14</sup> On all the occasions where CHSs purchased crack cocaine and cocaine powder during controlled purchase transactions, law enforcement field-tested the purchased substances, and in all of those field tests the substances tested positive for the presence of cocaine base. For those instances where the CHS purchased crack cocaine and/or cocaine, law enforcement visually inspected all suspected heroin obtained through controlled purchases and confirmed that the purchased substances in fact appeared to be crack cocaine and/or powder cocaine based upon its appearance and packaging as well as the training and experience of law enforcement officers.

**C. AUTHORIZED INTERCEPTIONS OF WIRE AND ELECTRONIC COMMUNICATIONS**

33. On or about June 14, 2018, the Honorable Jerome B. Simandle authorized the interception of wire communications over the following cellular telephone facility:

- a. The cellular telephone bearing number (856) XXX-483415 and International Mobile Subscriber Identity (“IMSI”) number XXXXXXXXXXXX9958, subscribed to by an unknown subscriber at an unknown address, serviced by Sprint PCS and used by **JOSE DIAZ** (hereinafter “Target Telephone 1”).

34. Interception of communications over Target Telephone 1 commenced on June 15, 2018 and terminated on July 3, 2018.

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<sup>14</sup> Law enforcement still is waiting on lab results for the substances purchased during some of the controlled purchase transactions with DTO members.

<sup>15</sup> The telephone numbers referenced herein are known to law enforcement, with “XXX” representing a series of numbers. The IMSI and ESN numbers referenced herein also are known to law enforcement.

35. On or about July 23, 2018, the Honorable Jerome B. Simandle authorized the interception of wire communications over the following cellular telephone facilities:

- a. The cellular telephone bearing number (267) XXX-7077 and International Mobile Subscriber Identity (“IMSI”) number XXXXXXXXXXXX1870, subscribed to by an unknown subscriber at an unknown address, serviced by T-Mobile (the “Target Telephone 2”), and used by **JASMIN VELEZ**.
- b. The cellular telephone bearing number (609) XXX-9586 and International Mobile Subscriber Identity (“IMSI”) number XXXXXXXXXXXX1573, subscribed to **DWIGHT WILLIAMS** at an address in Harrisburg, Pennsylvania, serviced by Sprint PCS (the “Target Telephone 3”), and used by **DWIGHT WILLIAMS**.
- c. The cellular telephone bearing number (856) XXX-8095 and International Mobile Subscriber Identity (“IMSI”) number XXXXXXXXXXXX5462, subscribed to **DAVID VELEZ** at an address in Camden, New Jersey serviced by Sprint PCS (the “Target Telephone 4”), and used by **DAVID VELEZ**.<sup>16</sup>

The judicial order also authorized the initial interception of electronic communications over Target Telephone 4.

36. Interception of wire communications over Target Telephone 2 commenced on July 25, 2018. Interception of wire and electronic communications over Target Telephone 4 commenced on July 24, 2018. With respect to Target Telephone 3, no completed calls were intercepted during the pendency of the authorized period of interception for this Target Telephone, but the FBI intercepted raw packet data associated with incoming attempted communications and precise location data pursuant to the search warrant authorized by the Court in connection with the application for interception of communications.

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<sup>16</sup> As described herein, **DAVID VELEZ** changed his telephone number from (856) XXX-8095 to telephone number (856) XXX-6352 on or about September 4, 2018, but because **DAVID VELEZ** kept the same IMSI number, there was no break in monitoring over **Target Telephone 4**.

37. On or about August 16, 2018, the Court authorized the continued interception of wire communications on Target Telephones 2 and 4, the initial interception of electronic communications on Target Telephone 2, and the continued interception of electronic communications on Target Telephone 4, and the initial interception of wire and electronic communications on the following cellular telephone facility:

- a. The cellular telephone bearing number (215) XXX-2071 and International Mobile Subscriber Identity (“IMSI”) number XXXXXXXXXXXX8510, subscribed to ROBERT RAMOS at a Post Office Box in Lenexa, Kansas, serviced by Sprint PCS (the “Target Telephone 5”), and used by **PAUL SALCEDO**.<sup>17</sup>

Interception of electronic communications over Target Telephone 2 commenced on July 24, 2018.

38. Interception of communications over Target Telephone 2 were terminated on September 15, 2018. Interception of communications over Target Telephone 4 ceased on September 15, 2018. Interception of communications over Target Telephone 5 began on August 16, 2018 and ceased on September 15, 2018.

39. On or about September 21, 2018, the Court authorized the initial interception of wire and electronic communications on the following cellular telephone facilities:

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<sup>17</sup> At the time that law enforcement first gained judicial authorization to intercept communications over Target Telephone 5, law enforcement reasonably believed, for the reasons set forth herein, that **PAUL SALCEDO** was the main user of Target Telephone 5. Since that time, for the reasons set forth herein, law enforcement has learned that Target Telephone 5 primarily is operated by **CARLOS PEREZ**. After learning additional information about Target Telephone 5 over the course of the last several weeks, law enforcement now believes that it is likely that **CARLOS PEREZ** primarily operated Telephone 5 during the entire period of interception on Target Telephone 5, and that **PAUL SALCEDO** merely borrowed or used Target Telephone 5 for a short period of time.

- a. The cellular telephone bearing number (215) XXX-8942 and unknown International Mobile Subscriber Identity ("IMSI"), subscribed to by JULY FRANCO at an address in Philadelphia, Pennsylvania, serviced by Verizon Wireless (the "Target Telephone 6"), and used by **NELSON SALCEDO**;
- b. The cellular telephone bearing number (609) XXX-6723 and International Mobile Subscriber Identity ("IMSI") number XXXXXXXXXXXXX0132, subscribed to by RAYMOND SANTIAGO at an address in Camden, New Jersey, serviced by T-Mobile (the "Target Telephone 7"), and used by **RAMON VELEZ**;
- c. The cellular telephone bearing number (315) XXX-1083 and Electronic Serial number ("ESN") XXXXXXXXXXXXXXX6587, subscribed to by a unknown subscriber at a unknown address serviced by Sprint PCS (the "Target Telephone 8"), and used by **RONNIE LOPEZ**; and
- d. The cellular telephone bearing number (201) XXX-1545 and International Mobile Subscriber Identity ("IMSI") number XXXXXXXXXXXXX4728, subscribed to by an unknown subscriber at an unknown address serviced by Sprint PCS (the "Target Telephone 9"), and used by **NELSON SALCEDO**.

40. Initial interception of wire and electronic communications over Target Telephone 7 began on September 24, 2018 and ceased on October 23, 2018. Initial interception of wire and electronic communications over Target Telephone 9 began on September 24, 2018 at approximately and ceased on October 23, 2018 at approximately 11:59 p.m. With respect to Target Telephones 6 and 8, no completed calls or text messages were intercepted during the pendency of the authorized period of interception for these Target Telephones, but the FBI intercepted raw packet data associated with incoming attempted communications and precise location data pursuant to the search warrant authorized by the Court in connection with the application for interception of communications.

#### **IV. PROBABLE CAUSE TO ARREST AND CHARGE DTO MEMBERS**

41. As described above, the DTO came to the attention of federal law enforcement in November 2016 based on a high volume of drug trafficking activity and violent acts occurring in



the vicinity of the DTO's main area of operation. Over the course of this investigation, law enforcement has learned that some of the DTO members previously have been federally convicted for engaging in similar drug distribution activities in the same or similar areas as those under investigation, using the same or similar tactics as before.

42. For example, **RONNIE LOPEZ**, **NELSON SALCEDO** and several other individuals were arrested by agents of the DEA in June 2001 after a drug trafficking investigation in the City of Camden. The investigation established that **RONNIE LOPEZ** and **NELSON SALCEDO** ran a drug trafficking organization that distributed cocaine and cocaine base (crack cocaine) in the City of Camden, and in particular from the 1200 block of Whitman Avenue. In running the drug organization, **RONNIE LOPEZ** and **NELSON SALCEDO** were found to have had a management role and directed the activities of other drug trafficking associates who reported to them.

43. The drug trafficking organization run by **RONNIE LOPEZ** and **NELSON SALCEDO** in 2000-2001 distributed a large volume of cocaine and crack cocaine. During this time frame, based on wiretap information and information provided by cooperating witnesses, **RONNIE LOPEZ** and **NELSON SALCEDO** were supplied one kilogram of crack cocaine per week by their drug supplier. The supplier also provided **RONNIE LOPEZ** and **NELSON SALCEDO** with one kilogram of powder cocaine every other week. The indictment charged that the drug trafficking organization operated for at least one year, between June 2000 and June 2001. At sentencing, **RONNIE LOPEZ** was held responsible for the distribution of 15 to 50 kilograms of cocaine. **NELSON SALCEDO** was held responsible for the distribution of over 1.5 kilograms of cocaine base (crack cocaine) and at least 15 kilograms of cocaine.

44. During the investigation in June 2000, **RONNIE LOPEZ** flew on a commercial flight to Puerto Rico to meet with his drug supplier. At the airport in Puerto Rico upon his arrival, DEA agents seized \$41,805 in U.S. currency from **RONNIE LOPEZ**'s luggage. According to court records, **RONNIE LOPEZ**'s family is from Puerto Rico and moved to New Jersey from Puerto Rico. After he was arrested in June 2001, agents searched **RONNIE LOPEZ**'s residence in New Jersey and seized over \$26,000 in cash. After **NELSON SALCEDO** was arrested in June 2001, his residence was searched and agents found approximately 238 grams of cocaine inside the residence.

45. During that time frame, **RONNIE LOPEZ** operated an auto detailing business, Superior Auto Detailing, in the City of Camden. According to the assigned DEA case agent and court records, the auto detailing business (referred to as "the shop" in wiretap calls) was a meeting place where the drug trafficking activities of the DTO were discussed and where illegal narcotics were sold at various times to customers of the drug trafficking organization.

46. Both **RONNIE LOPEZ** and **NELSON SALCEDO** ultimately pled guilty in this prior federal case to Conspiracy to Distribute cocaine and cocaine base before the Honorable Jerome B. Simandle, United States District Judge. On May 31, 2002, **RONNIE LOPEZ** was sentenced to 12 years (144 months) imprisonment, followed by 5 years of supervised release. This sentence was later reduced to 115 months imprisonment, due to retroactive changes to the United States Sentencing Guidelines. A review of U.S. Bureau of Prisons inmate records available online shows that **RONNIE LOPEZ** was released by the Bureau of Prisons on or about October 9, 2009. In 2010, a petition for violation of supervised release was filed by the Court, as the Probation Officer determined that **RONNIE LOPEZ** had unauthorized contact with a convicted felon

(another convicted felon who was in federal custody at the time and who spoke with **RONNIE LOPEZ** on multiple occasions from a federal prison in 2010). **RONNIE LOPEZ** ultimately admitted to having contact with a convicted felon and was reprimanded by the Court.

47. On May 24, 2002, **NELSON SALCEDO** was sentenced to 12 and ½ years (150 months) imprisonment, followed by 5 years of supervised release. This sentence was later reduced to 120 months imprisonment, due to retroactive changes to the United States Sentencing Guidelines. A review of U.S. Bureau of Prisons inmate records available online shows that **NELSON SALCEDO** was released by the Bureau of Prisons on or about March 16, 2010. Court records show that **NELSON SALCEDO** was on federal supervised release until approximately August 2016.

48. The locations where **RONNIE LOPEZ** and **NELSON SALCEDO** stored and distributed narcotics in the 2001 case were within 1.5 miles of the 400-500 blocks of Pine Street. Their past records and the evidence gathered in this case indicate that **RONNIE LOPEZ** and **NELSON SALCEDO** are committing the same crimes they were committing before they each went to federal prison to serve long sentences in the 2000-2001 time frame. Based on the information gathered from this investigation, **RONNIE LOPEZ** and **NELSON SALCEDO** now are working together again, along with other members of the DTO, to prepare and distribute illegal narcotics together from an open air drug set in the City of Camden, as described herein.

49. Notably, over the course of this investigation, numerous individuals, including some of the DTO members, have been arrested for drug-trafficking, firearms offenses and related offenses. Despite these arrests, as described herein, the area of the 400-500 blocks of Pine Street continues to be a center for drug-trafficking activities. The DTO is believed to be engaged in the

distribution of various controlled substances, including but not limited to fentanyl, heroin, cocaine, and crack cocaine, and in unlawful possession of multiple firearms in connection with these drug trafficking activities.

50. During the course of the investigation, law enforcement has used various investigative means and techniques in an effort to disrupt and dismantle the DTO to include; consensual audio recordings, consensual video recordings, controlled drug purchases, pen registers, search warrants, video surveillance, interviews of potential sources and Title III interception of wire and electronic communications. Information gathered from these investigative techniques has established probable cause to arrest the individuals set forth as follows.

**JOSE AGRON AKA G BABY**

51. **Summary.** **JOSE AGRON** aka G BABY is a DTO set worker who is believed by law enforcement to reside at an address in Camden, New Jersey. This belief is based on information in a law enforcement database as well as information that **JOSE AGRON** previously provided to local law enforcement when he was arrested on November 30, 2017 for resisting arrest and endangering law enforcement. For weeks at a time during the course of this investigation, on a near-daily basis, law enforcement officers conducting video surveillance have observed **JOSE AGRON** on the 400-500 blocks of Pine Street engaging in drug trafficking activities. During these times, **JOSE AGRON** has been present on this block during the morning shift of the DTO's drug-trafficking activities, engaging in what law enforcement recognized, based on training and

experience, to be hand-to-hand drug transactions.<sup>18</sup> **JOSE AGRON** also has been observed receiving “re-ups” of drug quantities from higher-level DTO members to distribute to set workers for street-level distribution. In addition, **JOSE AGRON** participated in direct sales of heroin to CHSs on February 23, 2018, March 29, 2018, and September 14, 2018.

52. **Criminal History.** **JOSE AGRON**’s criminal history includes: (1) a September 1, 2013 arrest by the Camden County Police Department that resulted in a felony conviction for possession of a firearm for unlawful purposes; and (2) a June 8, 2013 arrest by the Camden County Police Department that resulted in a felony conviction for the manufacture, distribution, or possession with intent to distribute controlled dangerous substances. **JOSE AGRON** has pending drug charges, including charges stemming from arrests by the Camden County Police Department on August 27, 2018 and September 16, 2018. Both of these arrests occurred in the vicinity of the 400-500 blocks of Pine Street, and were for loitering to commit a CDS offense. **JOSE AGRON** was also stopped by the Camden County Police Department on two other occasions in the vicinity of the 400-500 blocks of Pine Street, including on September 25, 2018 and October 13, 2018.

53. **Identification.** **JOSE AGRON** was identified as a member of the DTO through various sources of information, including: physical and video surveillance of **JOSE AGRON** conducting drug-trafficking activities on the 400-500 blocks of Pine Street, as set forth herein;

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<sup>18</sup> For example, video surveillance shows **JOSE AGRON** on the 400-500 blocks of Pine Street on a near daily basis during the morning shift, engaging in hand-to-hand drug transactions, on the following instances: September 1, 2018 between approximately 8:56 a.m. and 10:21 a.m.; September 6, 2018 at approximately 9:14 a.m.; September 17, 2018 at approximately 10:55 a.m.; October 5, 2018 at approximately 12:01 a.m.; October 8, 2018 at approximately 9:36 a.m. and 11:36AM; and October 12, 2018 at approximately 2:11 p.m.

direct identification by a CHS who has historical familiarity with **JOSE AGRON**, and who purchased drugs directly from **JOSE AGRON** over the course of this investigation, in the context of a controlled purchase transaction; and a phone call between a CHS and **JOSE AGRON** on March 29, 2018, which reflected that **JOSE AGRON** told the CHS that the CHS could contact **JOSE AGRON** on that same phone number in the future regarding drug transactions.

54. **JOSE AGRON** was identified as the user of the nickname “G Baby” through various sources of information, including the CHS who purchased drugs from **JOSE AGRON** on February 23, 2018 in the context of a controlled purchase transaction. Prior to this controlled drug transaction, the CHS already was familiar with **JOSE AGRON** and knew that **JOSE AGRON**’s nickname within the DTO was “G Baby.” On the morning of February 23, 2018 at approximately 8:47 a.m., the CHS called **JOSE DIAZ** at a number that he knew **JOSE DIAZ** to use, (856) XXX-0801, and the CHS expressed that the CHS wanted to purchase drugs. **JOSE DIAZ** directed the CHS to go to the 400-500 blocks of Pine Street to meet with “G Baby,” stating “Meet G-Baby out there right now.” The CHS then traveled to the 400-500 blocks of Pine Street and purchased a quantity of purported heroin from **JOSE AGRON** for a sum of United States currency. Following the transaction, as the CHS was leaving the area, the CHS stated to **JOSE AGRON**, “Yo I’ll get at you later G Baby,” and **JOSE AGRON** responded by stating “Alright [U/I], I’ll be here ‘til 2.”

55. **Selected Evidence.** As set forth above, **JOSE AGRON** sold drugs to CHSs on three separate occasions over the course of this investigation. For example, on March 29, 2018 at approximately 9:33 a.m., law enforcement conducted a controlled purchase of heroin from **JOSE AGRON** using a CHS. During the transaction, law enforcement instructed the CHS to travel to the intersection of 5th and Pine Streets in Camden to purchase heroin from one of the DTO set

workers. When the CHS arrived at the set, the CHS met with a male who the CHS recognized as **JOSE AGRON**. **JOSE AGRON** sold the CHS approximately thirty packets of suspected heroin in exchange for a sum of United States currency. During the drug transaction, **JOSE AGRON** provided a contact telephone number of (856) XXX-8725 to the CHS. Shortly after the transaction, at approximately 10:54 a.m., the CHS called **JOSE AGRON** at the telephone number that **JOSE AGRON** had provided to the CHS. **JOSE AGRON** informed the CHS that the CHS could contact **JOSE AGRON** on this number if the CHS wanted to purchase additional drugs in the future.

56. **JOSE AGRON** was intercepted during the investigation while engaging in drug-trafficking conversations. For example, on August 30, 2018, at approximately 4:26 p.m., law enforcement intercepted a call between Target Telephone 2, used by **JASMIN VELEZ**, and (856) XXX-9040, used by **JOSE AGRON**.<sup>19</sup> The following conversation took place:

JV: Yo.  
JA: Yo.  
JV: What's up?  
JA: You call me?  
JV: Yeah 'cause [U/I] [S/L Real] was lookin' for you...he was tryin' to get that money.  
JA: [stutters] Yo, um...  
JV: Just call him. He, he, He say he was callin' you.  
JA: ...man I don't got that nigga's number...  
JV: He say you, put in, you put in, you put your number in his phone 'cause I seened [sic] it.  
JA: Yeah, I did put my number in his phone but the [S/L] pussy ain't never call me, Jaz.  
JV: Oh, he said, he was, he was going to call you.  
JA: Hold on let my see...[U/I] 267 number, he got a 295 number?  
JV: Probably. I don't know. He...I don't know what number. I don't got that nigga number.  
JA: A'ight bro. Yo, you, uh bad boy left you, yo?

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<sup>19</sup> This was the phone number given to the CHS by **JOSE AGRON** during a controlled purchase transaction on September 14, 2018.

JV: Yeah. He talkin' 'bout he was comin' back in 20 minutes and he never came back.  
JA: You were out there by yourself?  
JV: Chris just found somebody else to come outside with me because he never came back. He talkin' bout "Imma be 20 minutes," I was like, "a'ight," and he said "I'll be back in 20 minutes" and never came back.  
JA: If you want to, I, you can use me for a couple hours if you want it. I, I'll sit around there wit' you for a couple hours when I bring that money around.  
JV: Motherfuckin, um, Chris had had uh, end up grabbin' somebody to come out.  
JA: Aight so y'all good.  
JV: Yeah (broken).  
JA: Aight then.  
JV: Aight bro.  
JA: Aight bro.

57. In the above conversation, I understand that **JOSE AGRON** was talking to **JASMIN VELEZ** about how another set worker had abruptly left the drug set on the 400-500 blocks of Pine Street ("he said 'I'll be back in 20 minutes' and never came back.") and so **JASMIN VELEZ** needed help on the drug set. **JOSE AGRON** offered to assist **JASMIN VELEZ** with the work on the drug set ("If you want to, I, you can use me for a couple hours if you want it. I, I'll sit around there wit' you for a couple hours") but **JASMIN VELEZ** declined his offer because "Chris" (**CHRISTOPHER VAZQUEZ**) already had found another person to help **JASMIN VELEZ** with the drug-trafficking ("Chris had had uh, end up grabbin' somebody to come out").

58. In addition to calls like the one above, where **JOSE AGRON** was directly intercepted while engaging in drug-trafficking conversations, law enforcement also intercepted calls where other DTO members discussed **JOSE AGRON's** drug-trafficking activities. For example, on September 12, 2018, at approximately 2:25 p.m., law enforcement intercepted a call between **JASMIN VELEZ** and **ELISA RIVERA** over Target Telephone 2 regarding **JASMIN VELEZ's** drug-trafficking activities with **JOSE AGRON** aka G BABY. A portion of this call is transcribed as follows:



ER: That Jas shit she owe that bread. I'm like what?  
 JV: What did he say?  
 ER: [U/I]  
 JV: I said now just for that I'm not giving him shit. I'm not giving him nothing. Get the fuck out of here.  
 ER: [U/I]  
 JV: Now I'm gonna tell him he gonna have to wait because that damn day, you know you know it's his fault, he didn't get the money because he didn't come get it.  
 ER: Yeah.  
 JV: You already know that, you already know that, like what the fuck, you know I ain't never fuck up your bread, there's \$300 dollars that been sitting in my fucking house for the past two weeks.  
 ER: Uh um.  
 JV: Get the fuck out of here, and I just showed G-Baby, and I just showed G-Baby, I said look there's three quads right here, he's like yo, you know what's crazy, he really thinks, listen I said, it's alright now, I'm really, now, I'm really him.  
 ER: Uh.  
 JV: Get out of here.  
 ER: He's like, I'm riding dirty. I was like, she's in the store, bro. I was like, alright. I was like, standby because she not answering my phone call neither.  
 JV: That's on him, though, because that [U/I] he ain't gonna give me shit, fuck out of here.  
 ER: Wow.  
 JV: I'm gonna come back at 6.  
 ER: Alright.  
 JV: Alright.

59. Based on my training and experience, and in the context of this case, I believe that in the above exchange **JASMIN VELEZ** is telling **ELISA RIVERA** that **JASMIN VELEZ** owes another DTO member \$300 in drug proceeds, and that the money currently is located in **JASMIN VELEZ**'s house. I also believe that **JASMIN VELEZ** is telling **ELISA RIVERA** that she showed **JOSE AGRON** ("G Baby") these drug proceeds, and that she also discussed drug quantities ("quads") with **JOSE AGRON**.

60. On August 30, 2018, at approximately 2:37 p.m., law enforcement intercepted a call between **JASMIN VELEZ**, using Target Telephone 2, and **ELISA RIVERA**, using (267) XXX-6168, regarding the drug-trafficking activities of themselves and of other DTO members,

including **JOSE AGRON** ("G Baby"). During the call with **ELISA RIVERA**, the following conversation took place:

- ER: I think, from now on, you probably come out for Jose. I will just come out for Chris. I'm come out every other day, man, I need to spend some time with my daughter.
- JV: Nahh, man, [I/A].
- ER: When you come with me, you can do the circle and the red. That's regardless, homey.
- JV: I don't know, but, ahh, Chris ain't tell me nah anything ain't change, he said I am out with you.
- ER: So, it start tomorrow (laughs).
- JV: Yea, but tomorrow, is, what umm, every other day
- ER: [I/A] You still, remember, you still gonna, I'm ahh make sure you come out every day but, at least with me, just the red and the purple you can do and then.
- JV: Yea, but, I ask him to come out on [I/A].
- JV: No, you gonna come out with me, but the do the red and the purple, you know like [I/A].
- ER: Yea, but the only days I gonna have to press the, the, the "D" is with you.
- JV: Only with your brother.
- JV: My brother said, I was coming, he, ain't tell me I was coming out in the morning, I thought I was you, baby.
- ER: No, afternoon, 'member, now is gonna be, ahh, the whole day, if you get your ass up in the morning.
- JV: What was that?
- ER: You could come out in the morning, tomorrow.
- JV: Nah, but, I don't want to come out in the morning, because he got G baby and them out here and I don't want to be with all of them.
- ER: No, no, you don't, you don't get it. They are gonna have a whole day, now, it's not half and half.
- JV: Yeah, I know, they got, the--aahh, it's the whole day, like, Chris got whole day then Jose got the...
- ER: That's what I'm saying, tomorrow in the morning you can come out in the morning and you can still come out in the afternoon to do the other stuff, cause remember I'm not staying the house no more, I left, so I got bills to pay with my mom.
- JV: Yo, keep walking, yo keep walking (Speaking in background to customer) So you, umm, you left already love.
- ER: Yeah.
- JV: Man.
- ER: Yep.
- JV: How was the reaction? (laughs)

[Call turns non-pertinent about **ELISA RIVERA** moving out of a house shared with the father of her daughter]

[**JASMIN VELEZ** is heard yelling at a customer in background, in sum and substance, telling the customer to keep walking because a cop was driving by]

[Call continues as pertinent, with **JASMIN VELEZ** speaking about another DTO member who is out on the drug set with her]

ER: So who's out there helping you out?

JV: They got some dude that was out here with, ahh, G-Baby this morning.

ER: Oh, alright.

JV: The black boy the-- was out here with G-Baby this morning.

ER: Alright, G-Baby said he with his stuff, like he say he can't, umm.

JV: I was, like, alright, well I'll just, ahh, see somebody. Hold on, I'm a call you back cause somebody calling me, okay.

ER: Nah, yeah, just hit me up later.

JV: Alright, love you.

ER: Alright, bye.

61. In the above conversation excerpts, law enforcement believes that **JASMIN VELEZ** and **ELISA RIVERA** were discussing the drug-trafficking activities of various DTO members at intersection of 5th and Pine Streets in Camden, including the activities of **JOSE AGRON** ("G Baby"), **CHRISTOPHER VASQUEZ** ("Chris"), and **JOSE DIAZ** ("Jose" and "my brother"). Law enforcement believes that when **ELISA RIVERA** referred to "pressing the D," she was referring to selling heroin, and that **JASMIN VELEZ** explained that she did not want to sell drugs on the drug set at the 400-500 blocks of Pine Street during the same time that **JOSE AGRON** ("G Baby") and others were selling drugs.

62. As another example, on September 1, 2018, at approximately 8:39 a.m., law enforcement intercepted a call between **CARLOS PEREZ**, using Target Telephone 5, and **WILLIAM CARILLO**, using (856) XXX-4446. During the call, the following conversation took place:

WC: Yo.  
CP: Yo, what's going on?  
WC: What's up, my brother?  
CP: Who's working?  
WC: Huh?  
CP: Who's working?  
WC: Uh, Todd, G-baby.

63. At approximately the same time as the above call, video surveillance captured a male appearing to be **JOSE AGRON** ("G Baby") walking on the 400 block of Pine Street. Approximately fifteen minutes later, video surveillance captured a closer video image of the same male, who law enforcement positively identified as **JOSE AGRON**. Approximately twelve minutes after that, video surveillance captured an apparent hand-to-hand drug transaction between **JOSE AGRON** and an unidentified male.

64. As another example, on September 3, 2018, at approximately 11:45 a.m., law enforcement intercepted a call between **JASMIN VELEZ**, using Target Telephone 2, and **CARLOS PEREZ**, using Target Telephone 5, during which **JASMIN VELEZ** and **CARLOS PEREZ** discussed G BABY. During the call, the following conversation took place:

CP: Yo.  
JV: Yo.  
CP: What's good?  
JV: Mother fuckin' um, they, they need you downtown.  
CP: Huh?  
JV: I said they need you downtown.  
CP: You, you done?  
JV: I'm done yeah but I don't go outside today.  
CP: You don't go out until 2 right?  
JV: No, I don't go out at all today. I only come out on Eisha days.  
CP: You can come out to do to do to do what you what you doing now.  
JV: Yeah I know but uhm.  
CP: You don't want to?  
JV: I don't come I don't come out today.  
CP: [U/I]

JV: You know me and Eisha did me and Eisha did decide to like sit down for a little while like every other day you feel me.

CP: So you don't want to come out at 2?

JV: I don't come out at 2.

CP: [U/I] do you want to come out, my question is do you want to come out?

JV: No, but...

CP: [U/I] That's all you had to say.

JV: It's not, it's not really my day though, like it's Hoz day, it's not first day of the month.

CP: Doesn't, doesn't matter if you want to come out, you can come out, if you don't want to come out, just don't come out.

JV: No, what I'm saying though, I don't know if you want to give it to me, to give it to them or if you want to give it to them, but G Baby out there and he needs some more.

CP: So what you wanna do?

JV: 'Cuz the one that I got, the one that I uh, the one that I got, I got a couple left that I got to finish off for me to be done.

CP: Oh, so you going out today?

JV: No I ain't gonna go out today.

CP: No I [U/I] going out with your friends or whatever?

JV: Oh no, no I'm not gonna be far.

CP: Alright, um, give me like 20, 20 minutes, 20 minutes I'll be down there I'll um to get to what you got and whatever, I'll give you something and give Will something.

JV: Alright just call me.

CP: I'll call you.

JV: Alright.

65. Law enforcement believes that in the above conversation, **JASMIN VELEZ** was asking **CARLOS PEREZ** to bring more drugs to, or "re-up," the drug set located at 5th and Pine Streets. Law enforcement also believes that **JASMIN VELEZ** was informing **CARLOS PEREZ** that she wasn't at the drug set at the time of the call, but that **JOSE AGRON** aka G BABY was out at the drug set and was ready receive more drugs for distribution ("G Baby out there and he needs some more").

66. Approximately an hour and fifteen minutes later, law enforcement intercepted a call between **JASMIN VELEZ**, using Target Telephone 2, and **CARLOS PEREZ**, using Target

Telephone 5. During the call, the following conversation took place:

JV: Yo.  
CP: Yo.  
JV: What's up?  
CP: You around?  
JV: Huh?  
CP: You around? You hear me?  
JV: About to be. Why? What happened? Where you at?  
CP: I'm coming down now. You out there or you somewhere else?  
JV: No, I'm not out there.  
CP: Tell me what to do. I'll pass these things off to somebody. [U/I]  
JV: I know. What you want to do? You want to take it to one of them?  
CP: Yeah, I'm going to take it to one of them. I give it to Will. You know what I mean?  
JV: How long you going to be out here for?  
CP: I'm on Haddon. I be there in three minutes. Where you at?  
JV: What you say?  
CP: I said I'm on Haddon.  
JV: Alright, I'm saying though. How long you gonna be in the hood for?  
CP: Not that long. I just trying...  
JV: Alright, I'm a call you as soon as I'm done here so you can pick up the money.  
CP: How long?  
JV: I'm not sure.  
CP: You want me to come to you?  
JV: Huh?  
CP: You want me to come to you?  
JV: Na, I'm a call you as soon as I'm done  
CP: Tambien, but I don't want to wait too long baby girl.  
JV: Alright, well, one of them is over, they should be over there. So, just give it to one of them.

67. In the context of this case, and considering the preceding intercepted conversation, law enforcement believes that **CARLOS PEREZ** called back **JASMIN VELEZ** to inform **JASMIN VELEZ** that he would be arriving at the drug set in a short time, in order to drop off more drugs for street level distribution by **JOSE AGRON**.

68. A couple minutes after the phone call, video surveillance captured **JOSE AGRON**

walking over to a dark colored Nissan Maxima parked in a parking lot at the intersection of 5th and Pine streets. At approximately the same time, a Nissan Versa, bearing a New Jersey license plate ending in -JKG, pulled onto the 400 block of Pine Street.<sup>20</sup> Video surveillance then captured **JOSE AGRON** and **WILLIAM CARILLO** interacting with the driver of the Nissan Versa. Based on the prior intercepted communication between **JASMIN VELEZ** and **CARLOS PEREZ**, law enforcement believes that **CARLOS PEREZ** was driving the Nissan Versa to the drug set in order to bring drugs for **JOSE AGRON**, **WILLIAM CARILLO**, and other DTO members to distribute to customers.

69. Approximately two hours later, at approximately 3:01 p.m., law enforcement intercepted a call from between **NELSON SALCEDO**, using Target Telephone 6, and **JASMIN VELEZ**, using Target Telephone 2. During the call, the following conversation ensued:

JV Yo.  
NS Yo.  
JV What's up?  
NS What's up? You coming out?  
JV Huh?  
NS Are you coming out?  
JV Nah, they out there. What do you mean?  
NS Who?  
JV Will and them outside.  
NS Yeah, but where's the shit you got?  
JV Ain't nobody tell me they needed none. G-Baby said he was good.  
He said he had something.  
NS I don't know. He ain't out there.  
JV Why? He said he ain't got nothing?  
NS I don't know.  
JV I'm about to walk around there. I'm about to walk around there.

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<sup>20</sup> This is a vehicle that has been registered by **RONNIE LOPEZ**, but over the course of this case, law enforcement has learned that **CARLOS PEREZ** often borrows the car. Law enforcement has learned this through text messages, calls, and video surveillance.

70. Law enforcement believes that in the above conversation, **JASMIN VELEZ** was telling **NELSON SALCEDO** that **WILLIAM CARRILLO** (“Will”) and **JOSE AGRON** (“G Baby”) were at the drug set, and that she was going to check to see if they needed more drugs to sell (“I’m about to walk around there”). It is also believed that when **JOSE AGRON** said he was “good,” he was telling **JASMIN VELEZ** that he already had enough drugs to sell on set.

### **PAUL SALCEDO**

71. **Summary.** **PAUL SALCEDO** is a DTO “runner,” or manager, believed by law enforcement to reside at a known address in Camden, New Jersey. This belief is based on physical surveillance, during which law enforcement observed **PAUL SALCEDO** enter and exit the residence on multiple occasions. On two separate occasions over the course of this investigation (August 2, 2018 and September 26, 2018), **PAUL SALCEDO** spoke with CHSs during controlled drug transactions and then immediately directed other individuals to sell drugs to the CHSs, which they then did, as described herein. **PAUL SALCEDO** has been intercepted on various Target Telephones, as described herein, while **PAUL SALCEDO** was conducting drug-trafficking activities. Law enforcement believes that **PAUL SALCEDO** is affiliated with the Bloods gang. Notably, **PAUL SALCEDO** has written various statements on “Facebook” and intentionally replaced the letter “C” in every word for another letter with a similar sound such as “K”.<sup>21</sup>

72. **Criminal History.** **PAUL SALCEDO**’s adult criminal history includes: (1) an August 13, 2008 arrest by the Camden City Police Department resulting in a felony conviction for Receiving Stolen Property; (2) a February 23, 2009 arrest by the Camden City Police Department

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<sup>21</sup> Based on my training and experience and the training and experience of other officers, law enforcement believes that the practice of replacing of the letter “C” is a common way that Blood members disrespect the Bloods’ rival gang, the Crips.



resulting in a felony conviction for a Controlled Drug Substance on School Property; (3) a March 30, 2009 arrest by the Camden City Police Department resulting in a felony conviction for Manufacture, Distribution, Possession with Intent to Distribute Heroin; and (4) a June 30, 2012 arrest by Camden City Police Department resulting in a felony conviction for Knowingly Receiving Stolen Property.

73. **Identification.** **PAUL SALCEDO** was identified as a member of the DTO through various sources of information, including CHS identification of **PAUL SALCEDO** from the two controlled drug transactions that **PAUL SALCEDO** participated in on August 2, 2018 and September 26, 2018, during which **PAUL SALCEDO** spoke to the involved CHSs and then directed other DTO set workers (specifically, **JASMIN VELEZ** and **ELISA RIVERA**, respectively) to sell drugs to the CHSs.<sup>22</sup> Also, intercepted communications reflect that **PAUL SALCEDO** was intercepted on the Target Telephones<sup>23</sup> communicating with other DTO members in drug-related conversations, including conversations about a particular black ink dice stamp motif that **PAUL SALCEDO** uses to package heroin. As set forth herein, the heroin that was purchased by the CHSs at **PAUL SALCEDO**'s direction on August 2, 2018 and September 26, 2018 bore the same black ink dice stamp motif on blue wax folds.

74. When law enforcement first applied for authority to intercept communications over

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<sup>22</sup> Due to technical difficulties, these two controlled drug transactions were not audio-recorded. The transaction on August 2, 2018 was recorded on video, however, and the transaction on September 26, 2018 was captured via video surveillance.

<sup>23</sup> During these intercepted communications, **PAUL SALCEDO** was using the phone number (315) XXX-1166, and self-identified or was referenced as "Little Bro" on multiple occasions. Also, the actions of **RONNIE LOPEZ**, as observed on physical surveillance, are consistent with the reported actions of the user of (315) XXX-1083.

Target Telephone 5, law enforcement believed that **PAUL SALCEDO** was the primary user of Target Telephone 5. This belief was based on various sources of information. For example, **JASMIN VELEZ** previously had identified the user of Target Telephone 5 as “Pauly” during a prior drug-related communication between Target Telephone 2 and Target Telephone 5. Additionally, on August 9, 2018, law enforcement intercepted a telephone call over Target Telephone 2, during which the user of Target Telephone 5 directed **JASMIN VELEZ** to come and meet him at a specific location.

75. Immediately following this exchange, law enforcement officers who were conducting physical surveillance observed **PAUL SALCEDO** meet with **JASMIN VELEZ** in the area of 6<sup>th</sup> Street and Royden Street in Camden. That said, as explained herein, law enforcement subsequently learned that **CARLOS PEREZ** was using Target Telephone 5. More specifically, during the period of interception of communications over Target Telephone 5, law enforcement came to the conclusion that **CARLOS PEREZ** was the primary user of Target Telephone 5, while **PAUL SALCEDO** was the primary user of (315) XXX-1166, which has been intercepted on drug-related calls with Target Telephone 5. Law enforcement officers familiar with **CARLOS PEREZ**’s voice confirmed these identifications, in addition to physical surveillance.

76. **PAUL SALCEDO** has been identified as the user of the nickname “Little Bro” within the context of the DTO. Specifically, **PAUL SALCEDO**’s older brother, older half-brother, and older cousin (i.e. **NELSON SALCEDO**, **RONNIE LOPEZ**, and **CARLOS PEREZ**, respectively) all refer to **PAUL SALCEDO** by the term “Little Bro” on intercepted calls. Law enforcement identified **PAUL SALCEDO** as the individual called “Little Bro,” and as the user of the telephone number 315-790-1166, through a combination of intercepted calls and text messages

between various DTO members, with and about **PAUL SALCEDO**.

77. For example, law enforcement intercepted a series of text messages on August 29, 2018, between the user of (315) XXX-1166, and **CARLOS PEREZ**, using Target Telephone 5. In these text messages, the user of (315) XXX-1166 and **CARLOS PEREZ** discussed **PAUL SALCEDO**'s need for a quantity of drugs to sell. **CARLOS PEREZ** then directed **PAUL SALCEDO** to go to **CARLOS PEREZ**'s "crib" and obtain the drugs from "[**CARLOS PEREZ**'s] girl". Shortly thereafter, law enforcement intercepted a call over Target Telephone 5 in which **CARLOS PEREZ**'s apparent girlfriend told **CARLOS PEREZ** that "Pauly" was at the residence, and **CARLOS PEREZ** told his girlfriend that the drugs ("rice") to give **PAUL SALCEDO** was "under the microwave."<sup>24</sup> Law enforcement knows that "Pauly" is a name used within the DTO to refer to **PAUL SALCEDO**, and this conversation is consistent with **PAUL SALCEDO**'s known role within the DTO as someone who picks up drugs from **CARLOS PEREZ** and provides these drugs to other DTO members for resale.<sup>25</sup>

78. In a subsequent intercepted conversation on September 10, 2018, **CARLOS PEREZ**, using Target Telephone 5, and **NELSON SALCEDO**, using Target Telephone 6, discussed a shortage of drugs on the 400-500 blocks of Pine Street, which had been reported to **NELSON SALCEDO** by **CHRISTOPHER VASQUEZ** ("C"). **NELSON SALCEDO** informed **CARLOS PEREZ** that "P," who he also called "my lil bro," had failed to provide

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<sup>24</sup> **CARLOS PEREZ**'s use of the term "rice" as a code word for drugs is repeated on another call on September 28, 2018 between **CARLOS PEREZ**, using Target Telephone 5, and **PAUL SALCEDO**, using (315) XXX-1166, as discussed further herein.

<sup>25</sup> It appears that **PAUL SALCEDO**'s brothers often use "Little Bro" to refer to **PAUL SALCEDO**, while other DTO members call **PAUL SALCEDO** by the nickname "Pauly."

**CHRISTOPHER VASQUEZ** with additional drugs for distribution so the drug shortage had become an “emergency” shortage. Given the various family relations involved and the overall context of this conversation, including the specific roles of the DTO members being discussed, I understand that this reference to “P,” or “my lil bro,” was a reference to **PAUL SALCEDO**. Further, I understand that the DTO uses first initials as coded references for DTO members, as reflected earlier in the conversation when **NELSON SALCEDO** referred to **CHRIS VASQUEZ** as “C.” Similarly, in another intercepted conversation between **CARLOS PEREZ**, using Target Telephone 5, and **PAUL SALCEDO** on September 1, 2018, using (315) XXX-1166, **PAUL SALCEDO** talked about “Big Bro,” who he also referenced as “my brother.” **CARLOS PEREZ** and **PAUL SALCEDO** talked about **PAUL SALCEDO**’s “Big Bro” in a way that made clear that the “Big Bro” held a position of high authority in the DTO, such as a supplier. This is consistent with what I know of **RONNIE LOPEZ**, who is the eldest brother and who has the highest position in the DTO among the DTO members being discussed herein. Additionally, as set forth below, the user of (315) XXX-1166 has been intercepted on calls self-identifying as “Little Bro.”

79. **Selected Evidence.** Various intercepted communications reflect that **PAUL SALCEDO** is involved in obtaining drugs for further distribution by lower-level DTO members on the 400-500 blocks of Pine Street. **PAUL SALCEDO** also is responsible for giving drug proceeds to higher-level members of the DTO. **PAUL SALCEDO** is responsible for packaging heroin and other drugs for the DTO. For example, on August 27, 2018, at approximately 6:47 p.m., Target Telephone 5, used by **CARLOS PEREZ**, received a call from (315) XXX-1166, used by **PAUL SALCEDO**, aka “Little Bro.” During the call, **CARLOS PEREZ** and **PAUL SALCEDO** had the following exchange:

CP: Hello.  
 PS: Yo.  
 CP: Who this?  
 PS: Little Bro.  
 CP: Yo, Choclata.  
 PS: Yo, you need, what's you need t-shirts?  
 CP: No, I need some trash bags.  
 PS: Humm.  
 CP: Make sure you get the white ones, bro.  
 PS: [I/A]  
 CP: No, take your time, I mean, I mean I got to pick up my girl in like another hour.  
 PS: Alright.  
 CP: I'm leaving like at seven thirty (7:30 p.m.), but I need them by, by like eight thirty (8:30 p.m.), yo, eight thirty nine (8:30-9:00 p.m.) eight thirty.  
 PS: [I/A] backwards, bro.  
 CP: Yeah, go to the corner store.  
 PS: Fuck man, like I'm right here, like on fucking one thirty (US130 Highway), like fucking going towards, like, fucking. Told him to give me the money, bro, like, we don't got nothing, we got no clothes, bro, like, he, want no clothes, we got nothing, bro.  
 CP: No clothes?  
 PS: Yea, t-shirts and those jeans.  
 CP: Humm.  
 PS: Get it?  
 CP: Yeah.  
 PS: F-ing yeah, we don't got no clothes, bro.  
 CP: Yeah.  
 PS: Or no food.  
 CP: You don't got no food?  
 PS: [I/A] that shit ain't gonna last.  
 CP: How many, how many bags?  
 PS: Not gonna last.  
 CP: How many bags of dog food you got?  
 PS: Only got sixteen (16), bro, that shit gonna go, bro.  
 CP: Are you serious?  
 PS: They did, they did a, they did twenty (20) yesterday.  
 CP: Alright, alright let me, umm, finish what I am doing here, just go, just go to the corner store then go get that for me.  
 PS: Alright.

80. In the context of this case, law enforcement believes that when **CARLOS PEREZ** and **PAUL SALCEDO** referred to "bags of dog food," they were referring to quantities of heroin.

Meanwhile, when they referred to “t-shirts” and “jeans,” they were referring to packaging materials.

81. Additionally, law enforcement believes that **PAUL SALCEDO** was complaining to **CARLOS PEREZ** about not having a sufficient quantity of heroin and packaging to supply to the drug set (“we got no clothes” and “we got no food”), and that he only has a quantity of 16 left on the set.

82. Intercepted communications also reflect that **PAUL SALCEDO** is involved in preparing and “mixing” drugs for distribution by DTO members. On August 28, 2018, at approximately 2:09 p.m., Target Telephone 5, used by **CARLOS PEREZ**, received another call from (315) XXX-1166, used by **PAUL SALCEDO** aka **LITTLE BRO**. During the call, **CARLOS PEREZ** and **PAUL SALCEDO** had the following exchange:

CP: Yo.  
PS: Yo. Yo, um, you got rice?  
CP: Huh?  
PS: I said you got, you got rice?  
CP: Do I have rice?  
PS: Yeah, you got rice, cuz last time this, I got this shit bro, this shit was sticking, all types, turning brown and...  
CP: Yeah that shit, that shit is not gonna do that to that, nigga, that’s something way totally different bro.  
PS: That’s what I’m saying, this shit look fucking, like fucking, shit looks like, looks different from the shit I got from my mans, like, it looks totally different.  
CP: That’s totally different what you got bro. Totally different.  
PS: This thing got no color to it.  
CP: Exactly, exactly. Don’t worry about that, that’s not bad. That’s what he wanted, [U/I].  
PS: I’m betting it’s gonna fall back on me though.  
CP: That’s what he wanted, you ain’t gotta worry about that, he already know that shit bro. He already know that.  
PS: ’Cuz I was, I was playing with the jawn and like my fingerprint, so that mean that shit and like, like, ah man, this shit ready to be a headache.  
CP: Just, just, you seen um, you seen um, this little nigga? The little nigga?

PS: I might, I'm about to call mans, see what the fuck [S/L] I'm mixing bro, 'cuz I'm not beat man.  
CP: It's not, you worrying about some ugly shit, that's the way it is bro. Little Bro already know that shit bro. That's the way it is. I'll talk to you, let me call him 'cuz I gotta call him, I haven't even called him yet.  
PS: Alright.  
CP: You ain't gotta worry about it, you're worrying about something small bro.  
PS: Alright.  
CP: Alright.

83. Law enforcement believes that in the above exchange, **PAUL SALCEDO** was talking to **CARLOS PEREZ** about the color ("turning brown") and consistency ("sticking") of the heroin ("rice") that **PAUL SALCEDO** was preparing ("mixing") for street level distribution by the DTO. This is consistent with **PAUL SALCEDO**'s and **CARLOS PEREZ**'s known roles in the DTO, as discussed herein.

84. Intercepted communications also reflect that **PAUL SALCEDO** has input into the manner and pace of the other DTO members' drug distribution activities, including whether DTO members should conduct drug-trafficking activities overnight. On September 11, 2018 at approximately 5:55 p.m., Target Telephone 5, used by **CARLOS PEREZ**, received another call from (315) XXX-1166, used by **PAUL SALCEDO** aka LITTLE BRO. During the call, **CARLOS PEREZ** and **PAUL SALCEDO** had the following exchange:

CP: Yo.  
PS: You know...you know if Bro home or not?  
CP: Nah.  
PS: You know what's crazy...Thank god I passed through there bro. Thank god.  
CP: What?  
PS: 'Cause you know...you know how H is bro. He last minute dude. You know he last minute....he a last minute person. He'll call you when he...Bro they trying to do that overnight shit. Noo bro. Like nooo. We can't keep up.  
CP: Overnight?  
PS: Like....yeahhhh. That's why they was trying to get more cause they be trying to do overnight. Nahh bro. Noo. Stick to the program bro. Stick to the script bro.

Like...and then shit like these won't be happening. We won't be running out.  
Stick to the script.

- CP: Yeah but overnight sounds good nigga.  
PS: Huh?  
CP: Overnight sounds good.  
PS: But if we can't keep up, what's the point?  
CP: I don't worry about that, bro.  
PS: I'm busting my head for nothing bro.  
CP: I don't worry about that. Bro, we'll keep up.

[CP & PS: talking over one another]

- PS: I'm like bro...Other boy ain't start yet. He about to start now. He like...  
CP: Why he starting now?  
PS: Cause you know....he....he....he...you know he got... he got a life too, you know what I mean....like he gave me two [U/I] and now two...he thinking....They ran through that two and then he gave me one this morning and then I took one for you. They ran through that. They ran through his two yesterday like nothing and...  
CP: Uh huh.  
PS: Like, you know it's....you know... 'cause it's....you know.....you know his sister and brother-in-law, you know he...he fired...they...they quit....you know what I mean?  
CP: Who?  
PS: His sister and brother-in-law.  
CP: Who quit?  
PS: His sister and his brother-in-law.  
CP: Oh yeah?  
PS: So they was banging shit out, you know what I mean? Like he could bang shit out like...So basically we had two...two...I just needed another sticker. If I had another sticker, shit would be getting banged out like nothing. I would be chilling....But right now I ain't chilling bro. Like I'm gonna have to keep it....I'm gonna have to keep it a hundred with bro. Stop giving me this fucking punk ass hundred dollars and stop giving me these punk ass two hundred dollars to get clothes. Bro it's not ha....it's not working bro. Like...  
CP: [Background audio in Spanish]  
PS: And I'm not gonna keep busting my head open bro.  
CP: [Background audio in Spanish] Bro I'm about to tell you how many cloth...  
PS: Like I'm not gonna keep busting my head open for this shit bro.  
CP: [Background audio in Spanish]  
PS: Like this shit is fucking bananas bro. Like...Yo I'm chilling bro. Like this shit ain't cool bro. This is not cool bro.  
CP: Yo I only....I only....I only got one...two box left and I'm....I'm gonna use those.  
PS: Huh?  
CP: I only got two, two, two um blue jeans.



PS: I gave you five though right?  
 CP: Yeah nigga I ran through that shit. I got two left. And those two is the gonna go with the last that I got.  
 PS: I hear you. Cause you only gave him what? You gave him 24?  
 CP: Papa listen to what I'm saying. I got two empties left and they gonna go. Don't worry about it. Go ahead.  
 PS: Man I got...I have....I don't understand...like he do a whole hundo' with five and three.  
 CP: That's what I'm saying. I got...I got two left.  
 PS: Ohh man, Bro got...What the fuck is he? He gotta like give like niggas a hundred and a hundred. Or two hundred and two hundred bro. 'Cause the shit is ripping outrageously bro. Like bro they gonna be calling me in like a half hour. I guarantee it bro.  
 CP: Don't worry about it. Don't worry about it. I got you.  
 PS: [U/I.] And then I gotta leave some for C. You know what I'm saying? Like...  
 CP: Man don't worry about....Don't worry about that man.

[CP & PS: talking over one another]

PS: Little Bro, like if you don't get your shit together bro, you gonna get fired. [U/I]. Give me everything back, bro. That's why...Damn man this nigga's hands gotta hurry up and get fucking fixed, bro, because now they talking about surgery and all this shit bro. When he was doing the shit, the shit like I was fucking good...like he had me, like fuck. Like I could go home and take a fucking nap for an hour at least. I can't do shit. Bro, I literally can't do shit bro.  
 CP: Alright let me finish here. I'll call you when I'm done.  
 PS: Fucking end up in a box with Old fucking Bro man.  
 CP: Yeah nigga go ahead with that shit. Bye. Bye.

85. Law enforcement believes in the above exchange, "H" is a reference to **JOSE DIAZ**, aka HOZ, who is a shift manager supplied by **PAUL SALCEDO**. It is also believed that **JOSE DIAZ** was trying to obtain additional heroin from **PAUL SALCEDO** in order to supply an overnight shift, which **PAUL SALCEDO** did not believe he had enough heroin to supply. Law enforcement also believes that "C" is a reference to **CHRISTOPHER VAZQUEZ**, another shift manager supplied by **PAUL SALCEDO**. It is also believed that when **CARLOS PEREZ** says he's got "two blue jeans left," he is referring to having a quantity of heroin packaging material. Additionally, it is believed that **PAUL SALCEDO** is upset with his supplier **RONNIE LOPEZ**.

("Bro") because **RONNIE LOPEZ** is not giving him heroin fast enough to keep the DTO set workers supplied. This intercepted conversation is consistent with **PAUL SALCEDO's** and **CARLOS PEREZ's** known involvement in packaging heroin for the DTO.

86. **PAUL SALCEDO** and **CARLOS PEREZ** also discussed the DTO's need for heroin stamps ("stickers") with the black dice motif in a call intercepted on September 11, 2018 over Target Telephone 5 at approximately 6:45 p.m., as follows:

CP: Yo.

PS: Yo....what um name did you use for the sticker? Cause I'm gonna have to get another sticker. And he didn't even give me no more food so I can get um my peoples so they can give to his sister. I'm 'bout to...I gotta get ink. Fucking ohh man. What um...? And um what...how do I find...find the, the, the uh the sticker? On there?

CP: What sticker?

PS: The sticker. The, the, the sticker. The, the, you know, the sticker. The, the, the, the, you know...the dice.

CP: Yeah I know. Yeah.

PS: Huh?

CP: What you mean the sticker? Where can you find it at?

PS: No, I know. Staples, but I need to know like what like...how do I get the, the same exact one we got? Because, you know, they opening up another jawn. Like you know what I mean like...and then I'm like looking up...you, you making me buy another sticker, but you ain't give me no food. You ain't give me no more food, no more clothes, nothing, no clothes, no nothing bro.

CP: Are you serious?

PS: Like, we going day by day. Bro, I can't...bro, I, I, I, I need sleep. I need rest, bro. Like I can't like...I haven't had good sleep in like fucking two weeks.

CP: Yeah, but you seen him, right?

PS: Yeah, I just came from his crib, bro. I just gave that nigga 7700. I just gave that nigga more than...over...I gave that nigga 13 stacks bro. One day. Like he think it's a fucking game bro like I need food. I need food bro. The dog, yo...the dog is hungry. I need food before they die and before shit fuck...gets shut down bro. I need food bro. I'm not gonna keep repeating myself bro. I'm gonna fucking step down and everything gonna fall apart bro. I'm telling you.

CP: This nigga yo...

PS: Cause my yo....my boy...my boy is jarto [literally fed up] bro. He's jarto bro. He's...mom's dude's dead. Fucking got a dad...blind dad he gotta take care of. [Spanish] Like, he's to the point he's about to fucking kill himself, bro, like he don't know what to do. And then he got me rushing me....then he got me rushing

him on the other end because of fucking dickhead retard don't wanna be two steps ahead. [U/I] wanna put it together. Motherfucker put it together. It's gonna go. It's...It's going.

CP: Yeah...

PS: Like the shit is fucking rocking bro. Outrageous. And then C's like, "Damn you didn't even gonna have some for me?" I'm like, uh...I know even know, bro. Like, he was supposed to give me two...I said, bro you don't got no money like you gimme some....like gimme two...two more hundred dollars so I can take it to my peoples, so I can get the ink and you know what I mean?

CP: Yeah.

PS: He just ignored me, bro. "I love you kid." And that's it. That's all I get. [U/I]. Yo, I be wrong if I turn my phones off, bro.

CP: Turn...turn it off. Go home.

PS: Yo bro. This shit is crazy, bro. Like how...and then you crying on me not making money? Like, motherfucker, keep up! Like, come on man...UI. "I'm gonna....I'm gonna go see nephew now...See you know...[U/I] don't worry about it. I'm gonna take care of it." Well, how you gonna take care of this with no clothes, no back-up, no sticker...extra sticker, no nothing.

[PS & CP talking over eachother]

CP: What about the sticker you had already?

PS: He, he, he....he trying to get another one. So it can be him and he could have another...he could his sister and his brother-in-law, you know what I mean? He could be working, and his brother-in-law and his sister could be working, you know what I mean? So it could be three. So you could f....so you could relax here and there. And then...

[PS & CP talking over eachother]

PS: You know so everybody could get their...so everybody could get relax time for them.

CP: Nah, I'm alright. Just keep it coming. Keep me busy everyday.

PS: That's the only thing. I don't know what name. Like I...I don't know how to find this shit bro, 'cause they gonna want an email address.

CP: I'm not doing that shit no more. I told you, don't do that nigga.

PS: Man I ain't go no choice bro.

CP: [U/I]. Tell him to go give up his email.

PS: Huh?

CP: Tell him to go take his email.

PS: I know...I'm gonna give him....I'm gonna tell him....I'm gonna give him, but the only thing is the, the, the dice...like how am I...where am I gonna find that shit at, bro? Like I know they got it on stock pero [but] you know what I'm saying like...

CP: You gotta give them the serial number.

PS: Huh?  
CP: Give them the serial number.  
PS: I'm...I don't know...the fucking serial number I know is the Q10. That's about it, but they need....  
CP: Q11. Q11.  
PS: Q11?  
CP: Yeah.  
PS: Q11?  
CP: Yeah, that's what it says on there.  
PS: What the fuck? Alright.  
CP: I mean I got...I seen the box...Where the fuck I put that box at?  
PS: Alright. Let me get this ink man. Man shit man.  
CP: Go ahead.

87. In my training and experience, and in the context of this case, I understand that in the above conversation **CARLOS PEREZ** and **PAUL SALCEDO** are discussing the dice motif stamp ("sticker") used to stamp heroin packaging, and the identifying number ("Q11") for this stamp at "Staples," which I know to be a national office supply store. Notably, as discussed herein, this black dice stamp motif is a hallmark brand of the heroin supplied by the DTO, which has been purchased by CHSs on multiple occasions over the course of the investigation. The stamp is distinctive, and the motif apparently needs to be hand-stamped onto the heroin packaging, as reflected by the packaging on the heroin purchased by CHSs.

88. Over the course of the investigation, **PAUL SALCEDO** has directed set worker **JASMIN VELEZ** to sell drugs to a CHS. Specifically, on the afternoon of August 2, 2018, at the direction of law enforcement, a CHS traveled to the intersection of 5th and Pine Streets to purchase heroin. Once the CHS arrived on the drug set, the CHS talked with both **JASMIN VELEZ** and **PAUL SALCEDO**, and then **PAUL SALCEDO** directed **JASMIN VELEZ** to sell drugs to the

CHS.<sup>26</sup> **JASMIN VELEZ** then gave the CHS approximately one hundred and forty-six glassine packets of purported heroin in exchange for an amount of United States currency. These glassine packets contained the packaged drugs inside of blue wax folds, which, in turn, were stamped with the DTO's black dice motif.

89. **PAUL SALCEDO** also has directed set worker **ELISA RIVERA** to sell drugs to a CHS. Specifically, on the afternoon of September 26, 2018, a CHS traveled to the intersection of 5th and Pine Street to purchase heroin. Once the CHS arrived on Pine Street, the CHS spoke to **PAUL SALCEDO**, and **PAUL SALCEDO** directed **ELISA RIVERA** to conduct the drug transaction with the CHS. **ELISA RIVERA** then sold approximately 78 glassine packets of purported heroin to the CHS in exchange for a sum of U.S. currency. These glassine packets contained the packaged drugs inside of blue wax folds, which, in turn, were stamped with the dice motif in black ink.

#### **CHRISTOPHER VAZQUEZ**

90. **Summary.** **CHRISTOPHER VAZQUEZ** is a DTO shift manager believed by law enforcement to reside at a known address in Camden, New Jersey, based on information that **CHRISTOPHER VAZQUEZ** provided to law enforcement following his arrest on or about June 14, 2016 for charges that were later dismissed. **CHRISTOPHER VAZQUEZ**'s role as a DTO shift manager has been corroborated by information provided by a CHS, combined with intercepted communications. Throughout the course of this investigation, enforcement officers have observed **CHRISTOPHER VAZQUEZ**, via video and physical surveillance measures,

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<sup>26</sup> The CHS later advised law enforcement that **PAUL SALCEDO** appeared to be **JASMIN VELEZ**'s boss during this transaction.

while **CHRISTOPHER VAZQUEZ** has engaged in street level narcotics sales. Law enforcement has also observed **CHRISTOPHER VAZQUEZ**, through physical surveillance, meeting with more senior DTO members for the purpose of securing drugs, which was confirmed through intercepted communications. **CHRISTOPHER VAZQUEZ** also has participated in direct sales of narcotics to CHSs, as set forth herein.

91. **Criminal History.** **CHRISTOPHER VAZQUEZ**'s adult criminal history includes: (1) a June 5, 2009 arrest by the Camden City Police Department that resulted in a felony conviction for conspiracy to manufacture or distribute controlled dangerous substances or having the intent to manufacture controlled dangerous substances; and (2) a June 4, 2012 arrest by the Camden City Police Department that resulted in a felony conviction for conspiracy to manufacture, distribute, or possess with intent to distribute heroin and a felony conviction for manufacturing or distributing controlled dangerous substances. In addition, **CHRISTOPHER VAZQUEZ** has been arrested on three other occasions by CCPD in the vicinity of the 400-500 blocks of Pine Street, including on November 16, 2017 (arrest for loitering to commit a CDS offense), on December 16, 2017 (arrest for drug paraphernalia), and on February 6, 2018 (arrest for outstanding warrants). In addition, law enforcement has also stopped **CHRISTOPHER VAZQUEZ** in the vicinity of the 400-500 blocks of Pine Street on multiple occasions, including on February 1, 2018 and on March 29, 2018.

92. **Identification.** **CHRISTOPHER VAZQUEZ** was identified as a member of the DTO through various methods. For example, as set forth above, a CHS who is familiar with **CHRISTOPHER VAZQUEZ** explained his role and responsibilities within the DTO and identified him. Also, **CHRISTOPHER VAZQUEZ** sold drugs directly to CHSs on December

18, 2017 and May 4, 2018, in the context of controlled drug transactions, and **CHRISTOPHER VAZQUEZ** was identified by the CHSs involved in these transactions as well as by law enforcement who were conducting contemporaneous surveillance activity. In addition, **CHRISTOPHER VAZQUEZ** has been observed over video surveillance as he is engaging in apparent hand-to-hand drug transactions on the 400-500 blocks of Pine Street.

93. As set forth herein, **CHRISTOPHER VAZQUEZ** has used multiple telephones over the course of this investigation, including (215) XXX-0455, (215) XXX-5165, (315) XXX-8510, (609) XXX-1621, all of which **CHRISTOPHER VAZQUEZ** used to conduct drug transactions. Two of these phone numbers, (315) XXX-8510 and (609) XXX-1621, have been intercepted on the wire. Law enforcement officers were able to identify **CHRISTOPHER VAZQUEZ** as the user of these phone numbers via voice identification, because law enforcement was familiar with **CHRISTOPHER VAZQUEZ**'s voice and style of speaking from prior communications, including those made during the controlled drug transactions described herein. Meanwhile, (215) XXX-5165 was a number supplied by **CHRISTOPHER VAZQUEZ** during the controlled purchase transaction with a CHS on May 22, 2018, while (215) XXX-0455 was a number supplied by **CHRISTOPHER VAZQUEZ** during the controlled purchase transaction with a CHS on May 4, 2018. Also, intercepted communications reflect that other DTO members refer to **CHRISTOPHER VAZQUEZ** by "Chris" when talking to him or about him. Finally, at various points during the investigation, DTO members have described the actions of "Chris" and then **CHRISTOPHER VAZQUEZ** has been observed on video surveillance taking actions that are consistent with the actions described.

94. **Selected evidence.** On multiple occasions over the course of the investigation,

DTO members were intercepted while engaging in conversations about **CHRISTOPHER VAZQUEZ**'s role as a shift manager in the DTO. For example, on or about June 19, 2018, investigators intercepted a communication between **JOSE DIAZ** and **DWIGHT WILLIAMS** over Target Telephone 1 regarding the trafficking of narcotics on the 400-500 blocks of Pine Street. During the call, **JOSE DIAZ** and **DWIGHT WILLIAMS** discussed who was responsible for a particular drug shift on the 400-500 blocks of Pine Street. The following is a transcription of the conversation:

JD: Yo.  
DW: Yo.  
JD: Yo.  
DW: I meant to call you early, um, I had to go my doctor's appointment shit, who got the second half, though? Chris?  
JD: I don't know, you have to talk to Chris.  
DW: Mmm, alright, I'm about to come out there anyway, though.  
JD: Alright.  
DW: Alright.

95. Based on my training and experience, and in the context of the investigation, I believe that **DWIGHT WILLIAMS** was contacting **JOSE DIAZ**, the morning drug shift manager, to seek approval to sell drugs during the afternoon shift of the DTO because he had missed his morning shift due to a doctor's appointment. The afternoon drug shift is known by law enforcement to be conducted from approximately 2:00 p.m. – 10:00 p.m. Ultimately, **JOSE DIAZ** advised **DWIGHT WILLIAMS** that he needed to ask **CHRISTOPHER VAZQUEZ** ("Chris") because **CHRISTOPHER VAZQUEZ** manages the 2:00 p.m. – 10:00 p.m. drug shift.

96. Law enforcement officers also have intercepted **CHRISTOPHER VAZQUEZ** as he is engaging in discussions about the DTO's drug-distribution activities. For example, on or about July 27, 2018, investigators intercepted a communication between **JASMIN VELEZ**, using



Target Telephone 2, and **CHRISTOPHER VAZQUEZ** using (609) XXX-1621, regarding the trafficking of narcotics on the 400-500 blocks of Pine Street. During the call, **CHRISTOPHER VAZQUEZ** identified himself as “Chris” and talked to **JASMIN VELEZ** about the amount of drugs she had left to sell (“I got like a couple not that much like fifteen”). The following is a transcription of the conversation:

JV: Hello.  
CV: Yo, what you doing?  
JV: Who dis?  
CV: Fuck you mean, who dis?  
JV: Who dis?  
CV: Chris nigga.  
JV: Ohh, oh, I’m sorry I didn’t hear the, ahh, I mean I didn’t save the number, I got the other one saved. I’m at the chines store.  
CV: [U/I] said you still got it.  
JV: No, I still got it, well I got like a couple, not that much, like fifteen.  
CV: [S/L] six she coming right, yo, she coming now, alright?  
JV: Alright.

97. Additional intercepted communications reflect and corroborate the information that law enforcement received from CHSs and other sources of information regarding **CHRISTOPHER VAZQUEZ**’s role within the DTO. For example, on or about July 30, 2018, investigators intercepted a communication between **JASMIN VELEZ**, using Target Telephone 2, and **CARLOS PEREZ**, using Target Telephone 5, regarding the DTO members’ drug-trafficking activities on the 400-500 blocks of Pine Street, including the activities of **CHRISTOPHER VAZQUEZ**. During the call, **CARLOS PEREZ** explained to **JASMIN VELEZ** that she owes him money for heroin that **CARLOS PEREZ** previously had given to her to sell (a common practice by drug-traffickers that is sometimes known as “fronting” drugs). **JASMIN VELEZ** confirmed that she owed **CARLOS PEREZ** money for the fronted drugs, and **CARLOS PEREZ** advised **JASMIN VELEZ** that he would be available to meet at approximately 6:00 p.m. The

following is a transcription of the conversation:

CP: Yo.  
JV: Yo.  
CP: You owe me for three.  
JV: I know.  
CP: Oh...you not done the other two.  
JV: I'm on the last one.  
CP: So why you only came up with one?  
JV: Because I didn't pay all the money together.  
CP: Oh, ok babe. Well, let Hoz know if not [U/I] calls already started.  
JV: Well you wanna talk to him he's right here  
CP: Nah, just tell him when he's done to give you the [S/L] G let him bang it out. It's gonna be out there cause ain't gonna be none 'til later, like 6 o'clock, 'til I'm done.  
JV: Aight.  
CP: Aight...which one you doing the blue too?  
JV: Um, now, yeah.  
CP: Oh, aight.  
JV: Eisha left.  
CP: Eisha left...why?  
JV: 'Cause she gonna be with Chris.  
CP: Aight, when I'm finished doing what I'm doing, Ima hit you up, just let Jose know.

98. Based on my training and experience, and in the context of the investigation, I believe that **CARLOS PEREZ** was directing **JASMIN VELEZ** to give any unsold drugs to "G," which is a reference to G BABY, or **JOSE AGRON** ("G let him bang it out"). **CARLOS PEREZ** also asked **JASMIN VELEZ** to explain why **ELISA RIVERA** ("Eisha") left the area, and **JASMIN VELEZ** explained that **ELISA RIVERA** left because she now is going to be working for **CHRISTOPHER VAZQUEZ** within the context of the DTO's drug-trafficking activities.

99. As another example, on or about August 2, 2018, investigators intercepted a communication between **JASMIN VELEZ**, using Target Telephone 2, and **CHRISTOPHER VAZQUEZ**, using (609) XXX-1521, regarding the trafficking of narcotics on the 400-500 blocks of Pine Street. During the call, **JASMIN VELEZ** and **CHRISTOPHER VAZQUEZ** discussed

the presence of law enforcement in the area of the 400-500 blocks of Pine Street. The following is a transcript of the conversation:

CV: Hello.  
JV: You see the cop?  
CV: Where?  
JV: Oh. Nah, I thought he was going after you 'cause he started speed, speedin' up when he...  
CV ...I seen him comin' up, that's why I turned [U/I].  
JV: Aight.

100. In addition to communications like the one set forth above, various intercepted calls reflect **CHRISTOPHER VAZQUEZ**'s position as a DTO shift manager who supervises set workers. For example, on August 11, 2018, law enforcement intercepted the following phone call between Target Telephone 2, used by **JASMIN VELEZ**, and (609) XXX-1521, used by **CHRISTOPHER VAZQUEZ**:

JV: Hello... my phone was on the charger.  
CV: [U/I] already?  
JV: Huh?  
CV: [U/I]  
JV: No, I still got everything.  
CV: Ah well, call your brother and see if he wanted it  
JV: You said what?  
CV: I said call your brother, and see if he want it, and give him whatever you got fresh.  
JV: Alright, so what, you want me to give him the quads too, or wait til you come get it?  
CV: Nah, you hold the quads and give him anything fresh.  
JV: Alright.  
CV: Alright.  
JV: Alright.

101. Based on my training and experience, and in the context of this investigation, I believe that **CHRISTOPHER VAZQUEZ** was directing **JASMIN VELEZ** to give **JOSE DIAZ** (i.e., her "brother") any new drugs that she just recently received ("whatever you got fresh") but

to hold back other drugs (“you hold the quads”). This is consistent with what I know to be **CHRISTOPHER VAZQUEZ**’s supervisory authority over set workers within the DTO, who are situated below him in the hierarchy of the DTO.

102. Other intercepted calls reflect that as a shift manager, **CHRISTOPHER VAZQUEZ** himself is supervised by higher-level DTO members within the hierarchy of the DTO, such as **CARLOS PEREZ**. For example, on or about September 4, 2018, investigators intercepted a communication between **CARLOS PEREZ**, using Target Telephone 5, and **CHRISTOPHER VAZQUEZ**, using (315) XXX-8510. The following is a transcription of the conversation:

CV: Yo.  
CP: Yo, uh, this girl out there?  
CV: What happened?  
CP: This girl out there?  
CV: Who?  
CP: H’s sister.  
CV: H, I ain’t seen him all day,  
CP: Huh?  
CV: I ain’t seen him all day.  
CP: No, his sister.  
CV: Oh yeah, she just got out here.  
CP: Yo, I’m calling her ass, yo.  
CV: She probably ain’t got her phone on her. I’m looking right at her though.  
CP: Is she working with you?  
CV: Yeah.  
CP: On the blue jeans?  
CV: I got the same thing you gave me I still got.  
CP: Yeah cuz she, she owe me double.  
CV: Huh?  
CP: She owe me two.  
CV: She owe you two.  
CP: Yeah man, I need that bro, she be dipping too fucking much, bro.  
CV: Well man, she right here. You better come get her. She won’t call you on the phone because she not gonna want to talk so.  
CP: Exactly. I don’t want to involve you in it either.  
CV: She here though she ain’t going no where, she here for the rest of the day.  
CP: Alright but what I gave you last night, don’t give her none of that, she don’t give me that two.

CV: Nah, somebody else fucking with it.  
CP: Tambien. I'm going call her ass now but I can't move, bro, I'm stuck on stupid, bro.  
CV: Hello.  
CP: Yeah?  
CV: What you say?  
CP: I'm stuck on stupid, I can't move, bro.  
CV: What you on foot?  
CP: Yeah I'm on foot bro. I need that from her, man. Get that I was gonna tell you to get that for me.  
CV: Alright, tambien.

103. Based on my training and experience, and in the context of this case, I understand that in the above conversation **CARLOS PEREZ** and **CHRISTOPHER VAZQUEZ** discussed their dissatisfaction with the various drug trafficking activities of **JASMIN VELEZ** ("H's sister," with H being a reference to HOZ, or **JOSE DIAZ**), and how **JASMIN VELEZ** needs to pay back the money that she owes **CARLOS PEREZ** for the drugs that he previously provided to her. Further, the above exchange reflects that **CARLOS PEREZ** is above **CHRISTOPHER VAZQUEZ** within the hierarchy of the DTO because **CARLOS PEREZ** gave direction to **CHRISTOPHER VEZQUEZ** regarding how **CHRISTOPHER VAZQUEZ** should manage his set workers ("what I gave you last night, don't give her none of that").

#### **CARLOS PEREZ**

104. **Summary.** **CARLOS PEREZ** aka CARLITO aka MEATBALL is believed by law enforcement to reside at a known address in Collingswood, New Jersey, based on physical and video surveillance of **CARLOS PEREZ** at this residence on multiple occasions. According to intercepted communications, **CARLOS PEREZ** participates in the DTO's criminal activities as one of the DTO's distributors/packagegers. As described herein, **CARLOS PEREZ** has used Target Telephone 5 and (201) XXX-9323 during this investigation to conduct drug-trafficking activities.

Further telephonic intercepts have revealed that in addition to supplying drugs to members of the Pine Street DTO, **CARLOS PEREZ** also is engaged in wholesale distribution of drugs to individuals in other areas of Camden that are known to law enforcement.

105. **Criminal History.** **CARLOS PEREZ**'s adult criminal history includes: (1) an April 8, 1994 arrest by the Camden City Police Department resulting in a felony conviction for CDS on school property; (2) a June 29, 1994 arrest by the Camden City Police Department resulting in a felony conviction for employing a juvenile in a controlled-dangerous substance distribution scheme; (3) an October 24, 1999 arrest by the Cherry Hill Township Police Department resulting in a felony conviction for possession of motor vehicle parts with altered identification; and (4) a July 31, 2010 arrest by the Gloucester Township Police Department resulting in a felony conviction for aggravated assault attempting to cause significant bodily injury.

106. **Identification.** **CARLOS PEREZ** was originally identified as a member of the DTO and the user of Target Telephone 5 through a combination of physical surveillance of **CARLOS PEREZ**, GPS location data over Target Telephone 5, and intercepted communications, some of which is described in the earlier section of this Affidavit regarding **PAUL SALCEDO**.

107. For example, on August 28, 2018, law enforcement intercepted a call over Target Telephone 5 to Target Telephone 8, used by **RONNIE LOPEZ**. During the telephone call, **CARLOS PEREZ** stated that someone had hit his mother's car, and **CARLOS PEREZ** and **RONNIE LOPEZ** agree to meet in the morning so that they could take the damaged car to a garage. That same night, at approximately 10:50 p.m., Target Telephone 5 received an incoming call from Target Telephone 6, used by **NELSON SALCEDO**. During the telephone call, the user of Target Telephone 5 told **NELSON SALCEDO**, in sum and substance, that the next morning

“Bro” was going to help bring his mom’s car to a garage.

108. The next morning, August 29, 2018, at approximately 8:13 a.m., Target Telephone 5 sent an outgoing text stating “Ready fo u.” Due to a system malfunction, the transaction data associated with the recipient of this text message did not populate, but based on the prior night’s telephone calls, law enforcement understood that this text message likely was sent to **RONNIE LOPEZ** at Target Telephone 8. Shortly thereafter, at approximately 8:24 a.m., Target Telephone 5 received an incoming text message from Target Telephone 8, used by **RONNIE LOPEZ**, which stated “Here.” One minute later, a previously-identified black Nissan Versa, bearing New Jersey license plate ending in -JGK and being operated by **RONNIE LOPEZ**, arrived in front of **CARLOS PEREZ**’s known residence in Collingswood. Law enforcement who were conducting physical surveillance observed **CARLOS PEREZ** exit his residence and entered the Nissan Versa passenger seat, and the Nissan Versa departed the area.

109. In this way, **CARLOS PEREZ** was identified as the user of Target Telephone 5 and **RONNIE LOPEZ** was identified as the user of Target Telephone 8. Law enforcement subsequently corroborated these identifications with other intercepted communications and surveillance observations, including on August 29 and August 30, 2018. These intercepted communications, attendant GPS information, and surveillance observations reflect that Target Telephone 5 entered and exited **RONNIE LOPEZ**’s known residence at the same time that law enforcement observed **CARLOS PEREZ** enter and exit **RONNIE LOPEZ**’s known residence, and law enforcement observed **CARLOS PEREZ** use his cellphone on two occasions at the same time that law enforcement intercepted calls over Target Telephone 5. Law enforcement has since analyzed GPS location information over Target Telephone 5 on other occasions, and it has been

consistent with the known movements of **CARLOS PEREZ**, as reflected in physical surveillance.

110. Subsequent surveillance activities and intercepted communications confirm **CARLOS PEREZ**'s identification as the individual with the nickname of "Meatball." This identification was achieved through a combination of information from CHSs regarding a DTO member named "Meatball"; video and physical surveillance of the user of Target Telephone 5 after the user identified himself to another individual as "Meatball"; and GPS location data. For example, on August 27, 2018, the user of Target Telephone 5 texted an unidentified person and said it was "Meatball"; similarly, various intercepted calls reflect that the user of Target Telephone 5 and (201) XXX-9323 has self-identified as "Meatball" to other individuals, and law enforcement has recognized Meatball's voice as being the voice of **CARLOS PEREZ**. Finally, as discussed elsewhere in this Affidavit in the section regarding **NELSON SALCEDO**, law enforcement identified **CARLOS PEREZ** as Meatball through a combination of physical surveillance and intercepted communications.

111. **Selected Evidence.** As set forth in greater detail elsewhere in the Affidavit, **CARLOS PEREZ** has used multiple telephones over the course of this investigation, including Target Telephone 5 and (201) XXX-9323, both of which **CARLOS PEREZ** has used to conduct illegal drug transactions. Over the course of the investigation, **CARLOS PEREZ** was intercepted over the Target Telephones engaging in conversations about the DTO's drug-trafficking operations in and around the 400-500 blocks of Pine Street.

112. For example, law enforcement intercepted a conversation on July 26, 2018 between **JASMIN VELEZ**, using Target Telephone 2, and **CARLOS PEREZ**, using Target Telephone 5, as follows:



CP: Put it to you this way, that's not the only spot, the only spot I fuck with.  
JV: Yah.  
CP: I got another two blocks I got to attend to.  
JV: Well we been busy that, that, that, that's regular.  
CP: I got niggas coming...you seen they came today for Beacon and all them. I just saw them niggas just now that turning. I got shit on my plate. I got a lot shit man.

[JV & CP talking over one another]

CP: And the only thing I be doing is just chilling...selling them hot dogs entertaining myself. Get shit out [U/I] and have some fun.  
JV: It's good that you think like that then worry about let everything stress you out.  
CP: I don't let nothing stress me out, boo boo, because if I let shit stress me out I be fucking, yo, I be out there raining...blackening on every fucking body.  
JV: Be miserable as hell.  
CP: No, I be blackening out the fucking block...on Will...on everybody...your brother...on every fucking body. That's why they took me off the fucking block. I black out on everybody. If shit ain't done done right with that [U/I] I ain't got no...I kick everybody off that block all y'all.

113. Based on my training and experience, and in the context of this case, I understand that in the above conversation **CARLOS PEREZ** explained to **JASMIN VELEZ** that **CARLOS PEREZ** supplies illegal drugs to at least two different locations within Camden, in addition to the 400-500 blocks of Pine Street ("Put it to you this way, that's not the only spot, the only spot I fuck with"). Further, I understand that **CARLOS PEREZ** stated that he has the ability to fire all of the street-level drug traffickers on the 400-500 blocks of Pine Street, where **JASMIN VELEZ** works, if **CARLOS PEREZ** does not believe they are fulfilling their job responsibilities ("I kick everybody off that block all y'all"). This is consistent with **CARLOS PEREZ**'s known role as a high-level DTO member.

114. In an intercepted telephone call on September 2, 2018, **CARLOS PEREZ**, using Target Telephone 5, and **WILLIAM CARRILLO**, using (856) XXX-4446, one of the street level drug-traffickers on the 400-500 blocks of Pine Street, discussed issues with management and

quantities of drugs available for street-level narcotics dealers to sell on the day of the intercepted conversation. A transcript of the conversation is as follows:

WC: Yeah.  
CP: Yo.  
WC: Yo, he ain't got no more?  
CP: Man listen [U/I]....I don't need to be....I don't got...That's why I pay these motherfuckers for. I don't need to be going down there myself. That's the whole point. Stay way too fucking late to do shit bro.  
WC: I told you they a bunch of re-re's bro.  
CP: They a bunch of fucking retards bro. I just talked to your n...your unc....your nephew. And I'm like...and he's like...[U/I]....But why you didn't call? I been calling you since yesterday my nigga. Like yo you good? Checking w...Y'all niggas don't like answering your fucking phones bro. Anyway....[Spanish: Did you tell [U/I] that he has to work it?]  
WC: [Spanish: Who?]  
CP: Little C got it.  
WC: Little C got it? Chris?  
CP: Chris. Yeah.  
WC: That little retard [Spanish: I haven't see him either].  
CP: [Spanish: Who is he working for, him or the nephew?]  
WC: [Spanish: He is the one who UI is picking up today]  
CP: [Spanish: Yes, but] he don't answer my phone call. [Spanish: He also has UI]  
WC: Yeah I haven't heard from none of them.  
CP: This is crazy, bro.  
WC: I been out here since 6.  
CP: And you...you and, hold on, little homey there, right?  
WC: Huh?  
CP: You and...[Spanish: You have your kid there right?]  
WC: Si.  
CP: Alright. Nah nigga if I take these shits to you, you gonna fucking [Spanish: take the 20]...the pesos bro. Fuck all this shit. Or I'm taking the 20 fucking dollars.  
WC: That's right. That's right nigga. I'm gonna be here.  
CP: Fuck all that shit bro.  
WC: Yeah, yeah, yeah. I'll do it.  
CP: [Spanish: He doesn't answer] but I need that out there because I can't keep bringing shit out bro.  
WC: Yeah.  
CP: And all these fucking quadres out bro. Nooo. Nooo. [Spanish: There's about [U/I] \$ in quadras outside]  
WC: Mmm hmm. Yeah.  
CP: I'm gonna call.  
WC: Alright just call me when you want me to meet you at.

CP: I'm on my way down there now nigga. I'm going straight down there bro.  
WC: Aiight.  
CP: Aiight.  
WC: Aiight.

115. Based on my training and experience, and in the context of this case, I understand that in the above conversation **CARLOS PEREZ** expressed frustration to **WILLIAM CARRILLO** that **CARLOS PEREZ** was paying other people to supply drugs to street-level drug-traffickers but **CARLOS PEREZ** was being forced to do the job himself ("I don't need to be....I don't got...That's why I pay these motherfuckers for. I don't need to be going down there myself. That's the whole point"). **CARLOS PEREZ** also expressed frustration to **WILLIAM CARRILLO** about the overall lack of communication by the DTO's shift managers ("your nephew," who is **JOSE DIAZ**, and "Little C," who is **CHRISTOPHER VAZQUEZ**) who work under **CARLOS PEREZ**, regarding their need for additional drugs for redistribution. **CARLOS PEREZ** then directed **WILLIAM CARRILLO** to collect the extra money from the packages of drugs that **CARLOS PEREZ** will supply to **WILLIAM CARRILLO** and provide that extra money to **CARLOS PEREZ** ("Fuck all this shit. Or I'm taking the 20 fucking dollars").

116. Law enforcement intercepted another conversation on August 28, 2018, between **CARLOS PEREZ**, using Target Telephone 5, and **RONNIE LOPEZ**, using Target Telephone 8. In this conversation, **RONNIE LOPEZ** checked in with **CARLOS PEREZ** about the color of crack cocaine that **CARLOS PEREZ** was cooking for the DTO ("shaking and baking"), after the two men had discussed a problem with the color of the drugs the previous day. A transcript of this conversation follows:

RL: Yo.  
CP: 'Sup.  
RL: That one looked better...little color....more color?

CP: I didn't really look at it that much. Right now I'm doing the other things. I'm gonna look at it.  
RL: Oh, you didn't even do it yet?  
CP: Yeah, it's already shaking and baking. I'm just waiting for it to settle down.  
RL: Alright.

117. In my training and experience, the above conversation is consistent with **RONNIE LOPEZ**'s status as a high-ranking DTO member, and it reflects that **CARLOS PEREZ** is providing a status update to **RONNIE LOPEZ** about the color and quality of the drugs that **CARLOS PEREZ** is preparing for the DTO's drug-trafficking activities ("...it's already shaking and baking. I'm just waiting for it to settle down").

118. Law enforcement intercepted a call on September 4, 2018 between **NELSON SALCEDO**, using Target Telephone 6, and **CARLOS PEREZ**, using Target Telephone 5. During this conversation, the two DTO members discussed management problems of the 400-500 blocks of Pine Street. A transcript of this conversation follows:

CP: Hello.  
NS: Yo.  
CP: 'Sup?  
NS: Yo, you got that Dominican dude number and [U/I]?  
CP: The who?  
NS: The Dominican dude and his girl.  
CP: The Dominican that what?  
NS: Bro, the Dominican dude and his girl.  
CP: Yeah.  
NS: Yeah, well, you need to call them man.  
CP: I'm not calling them, bro. I already just, me...Me and little Bro took care of that shit. They, they, they, they're out there on some... I don't know what the fucks going on with them people, bro.  
NS: Who them?  
CP: Them...them, the little nigga, you know what I'm saying. All of them.  
NS: I don't know. They talking about calling the police. I don't know.  
CP: Yep. Yep. I told the little nigga...told the little nigga. That what you said earlier, that shit's unorganized and that they did all the switch around shit it's...I don't know.  
NS: That shit was no problem when we had the regular people, man.

CP: Exactly. There you go.

NS: No problem.

CP: You saying it. There was no problem. Since he been in there, there's been loudmouths screaming: "This." "Yo I got this." "I got that." "Yo yo yo." Running up and down. That's what their talking about. All the neighbors...yo, the neighbors they were real cool. Now there going against us.

NS: Yeah, but why are they, um, trying to call the cops, though? I don't understand.

CP: Yeah but, yeah. Little Bro was like, said, "Nah she said that upset and then that she won't say that." Well nigga she told me that shit to me on the phone. That's when I told her: "Look I don't want to talk to you no more. I'll call you back, I don't like that." You know...you know we don't go that route.

NS: Yeah, all she gotta do is call one of us. We take care of it.

CP: Exactly. She did call me, but she called me yesterday, my nigga. I handled that shit yesterday. I told the little nigga...the nigga was like talking over me when I was trying to explain him: "Listen just don't do..." "Yeah but you know..." I said: "My nigga, listen to what I'm saying. Even your little bro said: "Yo, listen to the man. He's trying to talk to you."

NS: Yeah but J, J, J my nigga suspended for real, man, 'cause...This all happened because...because she don't wanna fucking be out there. She wanna be fucking sucking dick.

CP: I guess. She want to be sucking her little cousin's dick. [U/I].

NS: Yeah, yeah but if she's not gonna be out there she...she don't got no job at all man. Fuck that shit. And then W don't pick up his phone, like, I don't understand.

CS: W don't come out them yesterday, well them niggas [U/I] tomorrow. He gonna sit down with all of them, bro.

NS: Yeah W....

CP: You can do it today if you want.

NS: Yeah they told W to stay home today. I don't know why.

CS: Why? That's my question: Why? Why?

[NS & CP talking over one another]

CP: They were...they were the main ones that there and got that the way it is brother.

[NS & CP talking over one another] CP: It's not right for him not to be there.

NS: If he's not doing the other thing, he's could do another thing.

CS: Exactly.

NS: Like now, this little young boy that's with you, he said he got a warrant but I don't really want to talk to him, man. He a loud mouth, man.

CS: That's what I'm trying to say. Nobody wants to listen to me and then Big Bro talking about oh but you know his mentality from, from North. You know he's like that...Nigga, I don't fuck where he's from. Nobody needs to be [U/I].

NS: Yeah but they keep changing...I told him Bro. They need to stop changing.  
What's not broke, don't fix it man.  
NS: Exactly. We were fine bro. We were fine.

[NS & CP talking over one another]

CS: I told Bro that shit yesterday. He was like: "Yeah but you know since he's been there, you know, everything been getting up..." What? Since he's been there? My nigga have you seen what the fuck this [U/I] dude did? They bragging bro.  
NS: Now they taking the easy thing like yesterday she had to do [U/I] because they didn't want to give her no beef. Like I don't understand that shit man. She probably had that shit.  
CS: I'm trying to tell you. That's what I tell you.  
NS: Yeah but, H and C are doing it wrong. They need to fuck that day shit. Keep it the way it was, man. That's it. W...W and somebody in the morning, and the two girls in the night. That's it, bro.  
CS: They can...they can even keep the young boy and, and H in the morning, and W in the morning. They can keep both of them. They just gotta go by the law and relax my nigga.

119. In the above conversation, I understand that **CARLOS PEREZ** and **NELSON SALCEDO** are discussing their opinions on the various drug shifts and set workers, including their displeasure with some of their new set workers ("That shit was no problem when we had the regular people man"). **NELSON SALCEDO** and **CARLOS PEREZ** also discussed various residents on the 400-500 blocks of Pine Street who have threatened to call the police on their new set workers. **CARLOS PEREZ** and **NELSON SALCEDO** expressed their wish that the residents would just call one of them so that **NELSON SALCEDO** and **CARLOS PEREZ** could handle the problem without involving law enforcement ("Yeah but why are they um trying to call the cops though? I don't understand"). In my training and experience, and in the context of this case, I believe that this intercepted conversation reflects **CARLOS PEREZ** and **NELSON SALCEDO**'s responsibility for these lower level workers' drug-trafficking activities in this area, as well as the responsibilities held by **RONNIE LOPEZ** ("Big Bro").

120. Various intercepted text messages also reflect the interconnectedness and hierarchy of the DTO as well as **CARLOS PEREZ**'s leadership role therein. For example, on September 4, 2018, law enforcement officers intercepted a text exchange between Target Telephone 2, used by **JASMIN VELEZ**, and Target Telephone 5, used by **CARLOS PEREZ**, as follows:

CP: Whats up yo u got that for me.  
JV: I'm not done.  
CP: Ur bro just told me u owe him to.. Whats up wit u ma...  
CP: He said u owe him half .. I dont know u talk to him its been to long n nobody giving a fuck about n leaving wit shit n not finish ing n that's fucking me up n backing me up to.... I need that today ma.... Look im mad now u call me when that shit is done ... N give it to the nigga u working for today ok..thanks  
JV: For one I never fucked up wit u n wen I did what I had to so wen i did fuck up that one time I gave that money right away put my pocket dont compare me to nobody cus u the one that wanna to deal wit hoz I was getin n n doin what I had to do i was always straight wit u my nigga Aint never have a problem wit me  
CP: Im not saying its a problem im saying that u not done because u havent been there to finish it thats what i mean n right now its been to many days ..  
JV: I dont come out what u talking bout I got every other day I keep telling u that I come out on Chris days  
JV: U just gave me this the day before yesterday on my day meet ball what u talking bout  
CP: I know but u can come out .. U do t have to wait on hes day u can come out everyday !! Thats what im saying jaz..it needs to be out there everyday  
JV: It do what u talking bout baby had some so what u talking its always out here wen I'm out on hoz days u deal wit him not me im not get in paid to be doin none of that u give me what u give me n I do it on my days

121. Investigators believe that in the above text exchange, **JASMIN VELEZ** and **CARLOS PEREZ** are having a text message discussion in which **CARLOS PEREZ** scolded **JASMIN VELEZ** for not selling drugs in a timely manner ("its been to long n nobody giving a fuck about n leaving wit shit n not finish ing n that's fucking me up n backing me up to....."). **JASMIN VELEZ** then explained to **CARLOS PEREZ** that she only works on the drug set every other day ("I got every other day I keep telling u that I come out on Chris days"). **CARLOS PEREZ** responded that **JASMIN VELEZ** should be working more ("I know but u can come out ..

U do t have to wait on hes day u can come out everyday !! Thats what im saying jaz..it needs to be out there everyday”). **JASMIN VELEZ** then told **CARLOS PEREZ** that **CARLOS PEREZ** should “deal wit” HOZ, aka **JOSE DIAZ**, and not directly with **JASMIN VELEZ** (“I’m out on hoz days u deal wit him not me im not get in paid to be doin none of that u give me what u give me n I do it on my days”). This conversation is consistent with **JASMIN VELEZ**’s role as a set worker and with **CHRISTOPHER VAZQUEZ**’s and **JOSE DIAZ**’s roles as shift managers.

### **RONNIE LOPEZ**

122. **Summary.** **RONNIE LOPEZ**, aka BIG BRO, aka BRO, is believed by law enforcement to reside at a known address in Pennsauken, New Jersey based on physical surveillance of **RONNIE LOPEZ**, his vehicles, and his associates at this location. **RONNIE LOPEZ** is a high-ranking DTO member and is the main supplier of cocaine and other drugs for packaging and redistribution by other members of the DTO on the 400-500 blocks of Pine Street. As discussed herein, **RONNIE LOPEZ** is the user of Target Telephone 8 and has been intercepted on various Target Telephones over the course of the investigation while engaging in drug-trafficking activities. Further, **RONNIE LOPEZ** has been observed on physical surveillance while meeting with other DTO members, including **CARLOS PEREZ**, in a manner consistent with the intercepted communications regarding the DTO’s drug-trafficking activities.

123. **Criminal History.** **RONNIE LOPEZ**’s adult criminal history includes a June 6, 2001 arrest by the DEA resulting in a felony conviction for conspiracy to distribute and possession with intent to distribute 5 kilograms or more of cocaine/50 grams of cocaine base. This conviction for conspiracy to distribute crack cocaine resulted from a prior Title III wiretap investigation by the DEA, which involved at least one other identified member of this DTO, **NELSON**



**SALCEDO**. Notably, the activities that formed the basis for this prior federal conviction occurred less than 1.5 miles from the 400-500 blocks of Pine Street, as explained earlier in the Affidavit, where **RONNIE LOPEZ** is in the upper level management of this DTO.

124. **Identification.** **RONNIE LOPEZ** was identified as a DTO member and the user of Target Telephone 8<sup>27</sup> through analysis of GPS location data for Target Telephone 5, while used by **CARLOS PEREZ**, in conjunction with physical surveillance activities and intercepted communications. For instance, on August 29, 2018, as set forth below, the user of Target Telephone 8 spoke to **CARLOS PEREZ** on Target Telephone 5. The user of Target Telephone 8 and **CARLOS PEREZ** then planned to meet at **CARLOS PEREZ**'s residence. Soon thereafter, **CARLOS PEREZ** and the user of Target Telephone 8 spoke on the phone and the user of Target Telephone 8 stated, in sum and substance, that he was waiting "outside." At that time, law enforcement officers who were conducting physical surveillance on **CARLOS PEREZ**'s residence observed **CARLOS PEREZ** exit his residence and enter a Nissan Versa bearing a New Jersey license plate ending in -JKG that was being driven by and was registered to **RONNIE LOPEZ**. From this analysis of intercepted communications and surveillance, law enforcement concluded that the individual who had just been using Target Telephone 8 was **RONNIE LOPEZ**.

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<sup>27</sup> Law enforcement learned that **RONNIE LOPEZ** has used multiple telephones over the course of this investigation, including (315) XXX-1083 (i.e., Target Telephone 8) and (856) XXX-3109, all of which **RONNIE LOPEZ** used to conduct illegal narcotics transactions. **RONNIE LOPEZ** was identified as using phone number (856) XXX-3109 because (1) on October 4, 2018, **NELSON SALCEDO**, while using Target Telephone 9, texted (856) XXX-3109 and addressed the user of this number as "Big Bro"; and (2) on October 1, 2018, the user of (856) XXX-3109 called **NELSON SALCEDO** on Target Telephone 9 and got upset at him for a drug deal that did not go well. Shortly after this call, **NELSON SALCEDO**, using Target Telephone 9, called **CARLOS PEREZ** on (201) XXX-9323 and asked **CARLOS PEREZ** why he had spoken to "Big Bro" about the bad drug deal, because "Big Bro" had just yelled at **NELSON SALCEDO**.

Other surveillance activities and intercepted communications confirm **RONNIE LOPEZ**'s role within the DTO as well as his usage of Target Telephone 8.

125. **Selected Evidence.** Various intercepted communications over the Target Telephones, including Target Telephone 5 and Target Telephone 8, reflect that **RONNIE LOPEZ** is the high-level DTO member commonly known as "Big Bro" (or, in short form, simply "Bro"). **RONNIE LOPEZ** himself has been intercepted on Target Telephones discussing the quality of the drugs being sold by the DTO. For example, on August 28, 2018, the FBI intercepted an incoming call over Target Telephone 5, used by **CARLOS PEREZ**, from **RONNIE LOPEZ**, utilizing Target Telephone 8. The following conversation took place:

RL: Yo.  
CP: 'Sup.  
RL: That one looked better...little color....more color?  
CP: I didn't really look at it that much. Right now I'm doing the other things. I'm gonna look at it.  
RL: Oh, you didn't even do it yet?  
CP: Yeah, it's already shaking and baking. I'm just waiting for it to settle down.  
RL: Alright.  
CP: [U/I]  
RL: [U/I]  
CP: It be alright. Shit gonna go, no matter what.  
RL: Yeah. Alright.

126. Based on my training and experience, and in the context of this case, I understand that in the above conversation, **CARLOS PEREZ** and **RONNIE LOPEZ** were discussing the color of the drugs that **CARLOS PEREZ** was in the process of preparing for the DTO. I understand that the term "shaking and baking" referred to the process of mixing and cooking the drugs with other chemicals prior to distributing the drugs. Additionally, I understand that **CARLOS PEREZ** was assuring **RONNIE LOPEZ** that the drugs ("Shit") would sell "no matter what."

127. As another example, law enforcement intercepted a conversation between **NELSON SALCEDO**, using Target Telephone 9, and **CARLOS PEREZ**, using Target Telephone 5, that took place on August 18, 2018. The following is a transcript of the conversation:

CP: Yooo.  
NS: Yoo. What up?  
CP: What's going on?  
NS: Whatchu doing?  
CP: Barbershop.  
NS: Huh?  
CP: Barbershop.  
NS: Oh yeah....you ever seen the other dude?  
CP: Nah, man. I went to his...I went to his crib after you left and he wasn't there neither.  
NS: Damn...Ain't nobody out here man.  
CP: Ahh, how'd everything look?  
NS: Everything look good.  
CP: [U/I]. Was uh H...H was supposed to be there.  
NS: I don't know. Ain't nobody out, bro. Bro come through here, he's gonna be mad as hell.  
CP: Just testing shit...Thanks man. So you know, is what it is.  
NS: Yeah but...that shit gonna fall off. Watch man.  
CP: No it's not, bro. Stop saying....Shit is...shit is hot, bro.  
NS: Where's everybody else? Uh like...like damn.  
CP: Yeah but you j-just...where's H?  
NS: I don't know.  
CP: Bro wants...Bro wants Little...Little Bro to take care of that, so Little Bro should be out there making sure them niggas is out.  
NS: Aiight.  
CP: You know how it goes, but we've been doing it all this time. I don't...I don't really matter to me. I don't care. I'll do it.

128. I understand that in the above conversation, **NELSON SALCEDO** told **CARLOS PEREZ** about his concern that **RONNIE LOPEZ** would be upset if **RONNIE LOPEZ** knew about the lack of street-level drug traffickers working on the drug set on the date of the conversation ("Bro come through here, he's gonna be mad as hell"). **CARLOS PEREZ** responded that **RONNIE LOPEZ** wanted **PAUL SALCEDO** ("Little Bro") to "take care of that."

129. As another example, in an intercepted conversation on August 23, 2018, **NELSON SALCEDO** and **CARLOS PEREZ** indicated that **RONNIE LOPEZ** (“Bro”) and others paid **PAUL SALCEDO** to run the DTO’s day-to-day operations of the 400-500 blocks of Pine Street (“that’s why they pay Little Bro”). This was so that **RONNIE LOPEZ** and his partner could be protected from law enforcement’s interest in the drug-trafficking activities of the DTO by distancing themselves from the lower-level criminal activity of the DTO. **NELSON SALCEDO** and **CARLOS PEREZ** then expressed their frustration that, unlike other members of the leadership of the DTO, **RONNIE LOPEZ** failed to keep himself removed from the 400-500 blocks of Pine Street. This is a transcript of the intercepted conversation:

CP: Yeah, I know. Me and Bro was...we was...we was about to go down there, and I told him nah, we don’t need him. He need to go home.

[CP & NS: talking over one another]

NS: I don’t know why Bro keep going down there. He need to stay the fuck home.

CP: Yeah exactly.

NS: It’s hot as hell down there, dude.

CP: Really?

NS: Yeah, like he showing his face. Why he don’t do like Old Boy do? Relax home, like, I don’t understand.

CP: Cause he’s too....yo, yo...he’s got too much in his head. He’s...I mean he, he, he, he...I...I tell him: “Yo, stay the fuck home.”

NS: Yeah, like what we need to come out for, huh? I don’t understand.

CP: He be beat.

NS: That’s why he paid...that’s why he pays...that’s why they pay Little Bro so Little Bro do all that shit.

130. **RONNIE LOPEZ**’s high position in the DTO also was reflected in an intercepted conversation on September 3, 2018, between **CARLOS PEREZ** and **PAUL SALCEDO** (aka **LITTLE BRO**), in which **PAUL SALCEDO** indicated that **RONNIE LOPEZ** (aka **BIG BRO**) supplied drugs to **CARLOS PEREZ** for preparation and packaging, and the drugs were then

passed on to other DTO members like **PAUL SALCEDO** to supply to managers of the DTO, who would then pass the drugs to set workers for ultimate distribution to drug customers. The transcript of this conversation is as follows:

CP: Hello.  
PS: Yo.  
CP: What's going on?  
PS: Yo. You ain't got nothing together or nothing?  
CP: No poppi. He...none of that...never told me to do nothing. He ain't give me nothing...nothing said get with you today.  
PS: I got fifteen dollars at the crib, but um, I only got fifteen dollars left because I think C lost his phone cause he only gave H...He only gave H [U/I] four, so that means he did twenty one so that makes total, they did thirty, like thirty yesterday.  
CP: So you assed out?  
PS: I'm hoping...I'm hoping it basically...like I just got up with H. He gave me eleven and I can't get in contact...  
CP: [U/I]  
PS: The only way...The only way I get, you know, how I get in contact with C bro, I got to stand...I got to stay out there parked, wait for him to ride by or something.  
CP: Damn ya he was calling me for my shit nigga. It's ain't been out there all morning. I'm about to get up on it now. These niggas is [U/I]. They be ass with it bro.  
PS: Ya ya they niggas is out. They did uh from seven till nine...I think eleven, so that mean that shit going to be...That shit I mean I don't know...  
CP: So you fucking done done done? Like nothing at all?  
PS: I got fifteen dollars left at the...  
CP: I mean besides that. Nothing?  
PS: Nothing. That it.  
CP: Let me call Bro. Call you right back.  
PS: And I told, and I told Bro...  
CP: I know you did. Nigga ain't your fault. Don't worry about it. Don't even stress about it. Let me call him. I'll call you right back.  
PS: I'm on the way to his house. I got eleven dollars for him, cause I still got to pay this nigga, then grab the clothes and...and then...so he good. And I don't even know if he home. He said he was going to do something.

131. Based on my training and experience, and in the context of this case, I understand that in the above conversation **PAUL SALCEDO** told **CARLOS PEREZ** that the DTO was out of drugs for redistribution and asked if **CARLOS PEREZ** had any drugs ready for **PAUL**

**SALCEDO** to pick up. **CARLOS PEREZ** told **PAUL SALCEDO** that **CARLOS PEREZ** would call **RONNIE LOPEZ** regarding the drug shortage, and **PAUL SALCEDO** responded to **CARLOS PEREZ** that **PAUL SALCEDO** was already on his way to **RONNIE LOPEZ**'s house to drop off drug proceeds ("I'm on my way to his house, I've got eleven dollars for him").<sup>28</sup>

132. Moments later, **CARLOS PEREZ** and **RONNIE LOPEZ** discussed "Little Bro's" (**PAUL SALCEDO**'s) intent to travel to **RONNIE LOPEZ**'s residence to drop off drug proceeds, as well as the drug shortage on the 400-500 blocks of Pine Street that "Little Bro" **PAUL SALCEDO** had reported to **CARLOS PEREZ** in the prior conversation. The transcript of the conversation is as follows:

CP: Yo.  
RL: Yo.  
CP: What's good?  
RL: [U/I]. Home cleaning my room.  
CP: Yeah, talk to Little Bro?  
RL: Huh?  
CP: Talk to Little Bro?  
RL: Not yet.  
CP: Yeahh he's on the way to see you.  
RL: What happened?  
CP: Nothing, nigga, [U/I] on some emergency shit. Nigga the...he...he only got 15 dollars left for the movies...  
RL: [U/I].  
CP: Mhm. I just told him calm down. Everything gonna be alright. I said I just woke up. Let me brush my grill and shit. I'll call...I'll call...  
RL: So if he got [U/I] 1500, it means he... (Spanish: has \$5,000 for me).  
CP: That's what he said. He's waiting to collect everything. He's got something on him now.

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<sup>28</sup> Based on my training and experience, as well as the context of this discussion, "eleven dollars" is believed to be a reference to an unknown amount of drug proceeds that **PAUL SALCEDO** delivered to **RONNIE LOPEZ**, but many times in my experience, drug dealers will refer to larger amounts of U.S. currency that represent drug proceeds or money to purchase a drug supply in small amounts of money that actually represent a much larger amount of money – e.g. eleven dollars represents \$1,100 or \$11,000.

133. Further intercepted communications concerning **RONNIE LOPEZ** confirm that **RONNIE LOPEZ** is responsible for the high-level management of the DTO's drug-trafficking activities on the 400-500 blocks of Pine Street, including the major decisions about types and quantities of narcotics sold by the DTO, as well as the scheduled shifts for street-level drug traffickers to sell those drugs. Upper-level members of the DTO consult with **RONNIE LOPEZ** on matters concerning the drug-trafficking activities of the 400-500 blocks of Pine Street, such as problems with producing and packaging drugs for redistribution, as well as the personnel issues that arise when the DTO's drug-trafficking managers and street-level narcotics dealers fail to fulfill their job responsibilities.

**NELSON SALCEDO**

134. **Summary.** **NELSON SALCEDO** is believed by law enforcement to reside at an address in Camden, New Jersey, based on law enforcement's physical surveillance on November 14, 2018 and other dates. According to Title III wire interceptions and other sources of information, **NELSON SALCEDO** participates in the DTO's criminal activities as a distributor/packager, with **CARLOS PEREZ**. **NELSON SALCEDO** is the user of Target Telephones 6 and 9, and **NELSON SALCEDO** has been intercepted on various Target Telephones during this investigation while engaging in drug-trafficking activities.

135. **Criminal History.** **NELSON SALCEDO**'s adult criminal history includes a June 6, 2001 arrest by the DEA resulting in a felony conviction for conspiracy to distribute and possession with intent to distribute 5 kilograms or more of cocaine/50 grams of cocaine base (also known as crack cocaine). This prior conviction for conspiracy to distribute crack cocaine resulted from a prior Title III wiretap investigation, which involved at least one other identified member of

this DTO, **RONNIE LOPEZ**, as described above. The activities that formed the basis for this prior federal conviction occurred less than two miles from the 400-500 blocks of Pine Street, where **NELSON SALCEDO** is in the upper level management of the DTO.

136. **Identification.** **NELSON SALCEDO** was identified as a member of the DTO through a combination of multiple sources of information, including intercepted communications and surveillance observations. These same sources of information, taken together, also allowed law enforcement to identify **NELSON SALCEDO** as the user of Target Telephone 6 as well as Target Telephone 9.

137. With respect to Target Telephone 6, on or about September 2, 2018, law enforcement officers intercepted an incoming communication over Target Telephone 2, used by **JASMIN VELEZ**, from the user of Target Telephone 6. The user of Target Telephone 6 informed **JASMIN VELEZ** that he was leaving to come and meet her, and that she should get ready to meet him. During this time, law enforcement officers were observing **JASMIN VELEZ** on video surveillance. Moments later, law enforcement officers observed a car pull up, and the driver of that car conducted a hand-to-hand transaction with **JASMIN VELEZ**. Law enforcement officers conducting physical surveillance nearby then observed the same car leave the area and recognized the driver as **NELSON SALCEDO**.<sup>29</sup> A few minutes later, law enforcement observed the same car pull up to a garage that law enforcement knows to be connected to the DTO's drug-trafficking activities. Law enforcement watched as **CARLOS PEREZ** exited this garage and then met with **NELSON SALCEDO** at **NELSON SALCEDO**'s vehicle. Law enforcement recognized both

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<sup>29</sup> Law enforcement officers recognized **NELSON SALCEDO** from having viewed photos of him from law enforcement database records.



**NELSON SALCEDO** and **CARLOS PEREZ** via physical surveillance.

138. As another example, on September 6, 2018, law enforcement intercepted a call between **NELSON SALCEDO**, using Target Telephone 6, and **JASMIN VELEZ**, using Target Telephone 2, in which **NELSON SALCEDO** told **JASMIN VELEZ** “Yo I’m on my way. Be ready.” A few minutes later, **NELSON SALCEDO** called back **JASMIN VELEZ** and asked “Where are you at,” **JASMIN VELEZ** stated she was “right here near my mom backyard,” and **NELSON SALCEDO** instructed **JASMIN VELEZ** “I’m down toward the shop. Just walk down.” A few minutes later, law enforcement officers observed a Hyundai car bearing a Pennsylvania license plate ending in -4512, known to be used by **NELSON SALCEDO**, as the car arrived on the 400-500 blocks of Pine Street. Moments later, law enforcement observed **NELSON SALCEDO** exit the passenger side of the car and meet with **JASMIN VELEZ**.

139. Subsequently, law enforcement officers intercepted calls over the Target Telephones that involved the user of Target Telephone 9. Law enforcement recognized **NELSON SALCEDO** as the user of Target Telephone 9 based on their familiarity with **NELSON SALCEDO**’s (very distinctive) voice as well as the nature and content of the conversations between **NELSON SALCEDO**, **CARLOS PEREZ**, and **JASMIN VELEZ**. The identification of **NELSON SALCEDO** as the user of Target Telephone 9 also was confirmed via a combination of intercepted communications and surveillance activities, which reflected that **NELSON SALCEDO**’s movements were consistent with the movements of the user of Target Telephone 9. Further, the intercepted conversations involving Target Telephone 9 were consistent with the known role of **NELSON SALCEDO** within the DTO.

140. For example, law enforcement intercepted a conversation on October 1, 2018 at

approximately 6:12 p.m. between **CARLOS PEREZ**, using telephone number 201-423-9323, and **NELSON SALCEDO**, using Target Telephone 9, during which the two DTO members discussed the drug shortage on the 400-500 blocks of Pine Street and **CARLOS PEREZ** asked **NELSON SALCEDO** to pick up additional drugs for distribution at **CARLOS PEREZ**'s residence. A transcript of the conversation follows:

CP: Where are you? Around the way?  
NS: Huh?  
CP: You around the way?  
NS: Nah, man, I'm about to be on the highway to go home bro. I left that shit empty out there and everything. I don't give a fuck.  
CP: [U/I]  
NS: Now I don't know who to put out there or nothing. It's like crazy, man.  
CP: The same niggers you got, [U/I].  
NS: Who?  
CP: [U/I]  
NS: You still got [U/I] out there?  
CP: Yea, he's out there. I'm almost at three.  
NS: Huh?  
CP: I'm almost at three.  
NS: What you mean?  
CP: Three.  
NS: What today?  
CP: I'm not playing, bro. I just want to concentrate on this shit.  
NS: Who you got running it?  
CP: Me.  
NS: What you giving him?  
CP: Man, 130 bro, because that was just something I had right there. But once I put the other ones together, you know, I'm gonna put it back the same way it was.  
NS: Why don't you pick a couple jawns up from me and put somebody out there and tell them to give you 120 back?  
CP: What? From yours?  
NS: Yeah.  
CP: Yea, that's I'm telling you. You should have been passed them off. Give me them shits. I want to bring them. Come on, bring them.  
NS: Yeah.  
CP: If you want, bring them shits before you hit the highway.  
NS: Yeah. Some dude was flagging me down, the one that got the green  
CP: Yeah, the who?  
NS: The green, the green.

CP: The motherfucker, he another one too. He told me yesterday he left it home. I said what the fuck you mean, you left it home, bro?  
NS: For real?  
CP: Yeah.  
NS: That's why I don't want to give them no soft, because, party style man.  
CP: You don't need to give none of that soft.  
NS: Huh?  
CP: You don't need to give none of that soft. We already got too much of it going on.  
NS: Yeah.  
CP: Let me handle this shit. You gonna come through, come through. Let me know.  
NS: Tambien.  
CP: I'll be here.  
NS: Alright.  
CP: Alright.

141. Approximately a half hour alter, at 6:52 p.m., **NELSON SALCEDO**, utilizing Target Telephone 9, called back **CARLOS PEREZ** on (201) XXX-9323 to inform him that **NELSON SALCEDO** was outside of **CARLOS PEREZ**'s residence:

CP: Yooo.  
NS: Yooo little guy. I'm outside.  
CP: Oh okay.  
NS: Alright.

142. A few minutes later, at approximately 6:54 p.m., video surveillance at **CARLOS PEREZ**'s residence showed a white Hyundai, known to be driven by **NELSON SALCEDO** with a Pennsylvania license plate ending in -2095<sup>30</sup>, sitting outside of **CARLOS PEREZ**'s residence. At approximately 6:54 p.m., **CARLOS PEREZ** exited his residence and entered the vehicle. **CARLOS PEREZ** then sat in the vehicle outside of his residence for approximately 30 minutes, and returned to his residence at approximately 7:24 p.m.

143. As another example, in an intercepted conversation on October 3, 2018 at

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<sup>30</sup> The license plate for this car was identified on September 26, 2018, with **NELSON SALCEDO** positively identified as the driver.

approximately 12:15 p.m., **CARLOS PEREZ**, utilizing telephone number 201-423-9323, and **NELSON SALCEDO**, utilizing Target Telephone 9, agreed to meet at **CARLOS PEREZ**'s residence:

NS: Where you at your crib?  
CP: Yeah, I be in.  
NS: I'm gonna swing by.  
CP: [U/I] I'm about to jump in the shower but I'm gonna wait for you before I jump in the shower.  
NS: Alright.  
CP: Alright.

144. At approximately 12:32 p.m., video surveillance captured **CARLOS PEREZ** outside of his residence at the same time that a white Hyundai, known to be driven by **NELSON SALCEDO** with Pennsylvania license plate ending in -2095, arrived. The driver met with **CARLOS PEREZ**, and then at approximately 12:43 p.m., the vehicle exited the residence.<sup>31</sup>

145. **Selected evidence.** Intercepted conversations involving Target Telephone 6 and Target Telephone 9 reflect **NELSON SALCEDO**'s various drug-trafficking activities on behalf of the DTO.

146. For example, various intercepted phone conversations between **NELSON SALCEDO**, using Target Telephone 6, and **CARLOS PEREZ**, using Target Telephone 5, reflect that **NELSON SALCEDO** is involved in preparing powder cocaine for distribution. In one intercepted conversation between these same two numbers on August 18, 2018, **NELSON SALCEDO** complained to **CARLOS PEREZ** about the consistency of the drugs that were being sourced to the DTO and told **CARLOS PEREZ** that "we need to find some white girl"; in another intercepted conversation on August 22, 2018, **NELSON SALCEDO** told **CARLOS PEREZ** that

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<sup>31</sup> The driver could not be identified on the video surveillance on that date.

“Bro” (i.e., **RONNIE LOPEZ**) was “working on getting that white girl for us.” Based on my training and experience, and in the context of this case, I understand that these references to “white girl” are references to powder cocaine.

147. As another example, law enforcement intercepted a conversation on September 12, 2018 between **NELSON SALCEDO**, using Target Telephone 9 and **JASMIN VELEZ**, using Target Telephone 2. In this conversation, **NELSON SALCEDO** called **JASMIN VELEZ** to schedule a meeting so that he could supply **JASMIN VELEZ** with an unknown quantity of drugs for distribution on behalf of the DTO. A transcript of the conversation is as follows:

JV: Hello.  
NS: Yo, what’s good?  
JV: What’s up, bro?  
NS: I been trying to get with you last couple days like yo...  
JV: Where you at?  
NS: Where you at?  
JV: I’m about to be at my mom’s house like in twenty...about like twenty minutes  
NS: Where you at now? I’ll come to you.  
JV: I’m on my way downtown...on my way downtown. I’m in a car. I’ll be there in like fifteen, twenty minutes.  
NS: Yeah you got me riding around...I’m riding around dirty looking for you like god damn.  
JV: Well you know I don’t come outside ’till 2.  
NS: Yeah but I’ve been trying to get with you for the last couple days.  
JV: Motherfucking, ah, ah I was talking to Will yesterday because he was telling me he has some, and I was like alright well I haven’t seen Noz. I was outside yesterday, but not the day before.  
NS: Answer the phone.  
JV: Oh I haven’t had my phone. I just got my phone back, bro.  
NS: Yeah, but you’re saying names through the phone, know what I mean?  
JV: Motherfucking, ah, I guess meet you on Pine.  
NS: Pine ah either there or in the store on 6th Street. Just call me when you get there.  
JV: Alright.

148. I understand in the above exchange, **NELSON SALCEDO** reprimanded **JASMIN VELEZ** for not answering the phone when **NELSON SALCEDO** called her (“Answer the

phone”), especially because **NELSON SALCEDO** had drugs in his possession to give to **JASMIN VEEZ** (“riding around dirty”). In addition, **NELSON SALCEDO** instructed **JASMIN VELEZ** to refrain from naming any DTO workers over the phone (“you’re saying names through the phone, know what I mean?”) after **JASMIN VELEZ** told **NELSON SALCEDO** that she thought **WILLIAM CARRILLO** was in possession of drugs for **JASMIN VELEZ** to sell (“I was talking to Will yesterday because he was telling me he has some”).

149. In another intercepted conversation on September 3, 2018 between **CARLOS PEREZ**, using Target Telephone 5, and **NELSON SALCEDO**, using Target Telephone 6, **NELSON SALCEDO** and **CARLOS PEREZ** discussed an issue that arose when another member of the DTO took a quantity of drugs off of the drug set without proper authorization. The conversation was as follows:

CP: Hello.  
NS: Yo, my dude.  
CP: Yooo.  
NS: How you? Sleeping?  
CP: Nah.  
NS: Oh, okay.  
CP: Dog...  
NS: That little...That little faggot ass nigga he left bro.  
CP: Yeah?  
NS: He left. Bro just told me. He’s like [Spanish: he left ]. I say [Spanish: fucker]. He was supposed to bring them sneakers. He was like [U/I]. Man, Bro mad at that too.  
CP: Huh?  
NS: Yeah he mad cause he left me hanging, you know what I mean?  
CP: Yeah...  
NS: After everything I did, you know what I mean, I got it the way it is, you know what I’m saying? But anyway, that shit ripping bro.  
CP: Yeah?  
NS: Oh my god. Yours, mine, [U/I].  
CP: My shit ain’t ripping nigga. They’ve had that shit for two days already. This ain’t ripping.  
NS: Well, whatever they got, they got.

CP: That shit ain't ripping. They ain't turn in in two days.  
 NS: Yeah, well, it's coming today.  
 CP: I don't know. Yeah you don't got....You dry, dry, dry?  
 NS: Huh?  
 CP: You dry nigga?  
 NS: Yeah I only got, you know, two Mike Vicks, but I gotta put them together and put it out there.  
 CP: Alright well but, but, but what happened to that other shit he had?  
 NS: That's what I'm saying. He's gonna bring it to me. [Spanish: He left.]  
 CP: But what happened to that other shit he had nigga?  
 NS: Gone. It's gone. Gone.  
 CP: The new shit you was taking out?  
 NS: The what? The what?  
 CP: Huh?  
 NS: The what?  
 CP: The new shit you was taking out. Remember? You was putting one to the side...one to the side.  
 NS: Yeah, they gone too.

150. In my training and experience, and in the context of this case, I understand that **NELSON SALCEDO** complained to **CARLOS PEREZ** that **NELSON SALCEDO** was responsible for the success of the DTO ("I got it the way it is"), including its organization and the rapid pace of its drug-trafficking sales. **NELSON SALCEDO** and **CARLOS PEREZ** also talked about quantities of drugs ("Mike Vicks") and the pace of the DTO drug sales on the drug set ("that shit ripping bro").

151. In an intercepted call on September 4, 2018 between **CARLOS PEREZ**, using Target Telephone 5, and **NELSON SALCEDO**, using Target Telephone 6, **NELSON SALCEDO** and **CARLOS PEREZ** discussed some of the management and organization issues that had arisen on the 400-500 blocks of Pine Street. A transcript of the conversation is as follows:

CP: Hello.  
 NS: Yo.  
 CP: 'Sup?  
 NS: Yo, you got that Dominican dude number and UI?  
 CP: The who?

NS: The Dominican dude and his girl.  
 CP: The Dominican that what?  
 NS: Bro the Dominican dude and his girl.  
 CP: Yeah.  
 NS: Yeah, well, you need to call them man.  
 CP: I'm not calling them bro. I already just me...Me and little Bro took care of that shit. They, they, they, they're out there on some... I don't know what the fuck's going on with them people, bro.  
 NS: Who them?  
 CP: Them...them, the little nigga, you know what I'm saying. All of them.  
 NS: I don't know. They talking about calling the police. I don't know.  
 CP: Yep. Yep. I told the little nigga...told the little nigga. That what you said earlier, that shit's unorganized and that they did all the switch around shit it's...I don't know.  
 NS: That shit was no problem when we had the regular people man.  
 CP: Exactly. There you go.  
 NS: No problem.  
 CP: You saying it. There was no problem. Since he been in there, there's been loudmouths screaming: "This." "Yo I got this." "I got that." "Yo yo yo." Running up and down. That's what they're talking about. All the neighbors...yo, the neighbors they were real cool. Now there going against us.  
 NS: Yeah but why are they um trying to call the cops though? I don't understand.  
 CP: Yeah but yeah. Little Bro was like, said, "Nah, she said that upset and then that she won't say that." Well, nigga, she told me that shit to me on the phone. That's when I told her, "Look I don't want to talk to you no more. I'll call you back I don't like that." You know...you know we don't go that route.  
 NS: Yeah, all she gotta do is call one of us. We take care of it.  
 CP: Exactly. She did call me but she called me yesterday my nigga. I handled that shit yesterday. I told the little nigga...the nigga was like talking over me when I was trying to explain him, "Listen just don't do..." "Yeah but you know..." I said, "My nigga, listen to what I'm saying." Even your little bro said, "Yo, listen to the man. He's trying to talk to you."  
 NS: Yeah but J, J, J my nigga suspended for real man cause...This all happened because...because she don't wanna fucking be out there. She wanna be fucking sucking dick.  
 CP: I guess. She want to be sucking her little cousin's dick. [U/I].  
 NS: Yeah, yeah but if she's not gonna be out there she...she don't got no job at all man. Fuck that shit. And then W don't pick up his phone, like, I don't understand.  
 CS: W don't come out them yesterday, well them niggas [U/I] tomorrow. He gonna sit down with all of them, bro.  
 NS: Yeah W....  
 CS: You can do it today if you want.  
 NS: Yeah they told W to stay home today. I don't know why.  
 CS: Why? That's my question: Why? Why?



[NS & CP talking over eachother]

CP: They were...they were the main ones that there and got that the way it is, brother.

[NS & CP talking over eachother]

CP: It's not right for him not to be there.

NS: If he's not doing the other thing, he's could do another thing.

CS: Exactly.

NS: Like now this little young boy that's with you, he said he got a warrant but, I don't really want to talk to him man. He a loud mouth, man.

CS: That's what I'm trying to say. Nobody wants to listen to me and then Big Bro talking about oh, but you know, his mentalities from, from North. You know he's like that...Nigga, I don't fuck where he's from. Nobody needs to be [U/I].

NS: Yeah but they keep changing...I told him Bro. They need to stop changing. What's not broke, don't fix it man.

NS: Exactly. We were fine bro. We were fine.

[NS & CP talking over eachother]

CS: I told Bro that shit yesterday. He was like: "Yeah but you know since he's been there, you know, everything been getting up..." What? Since he's been there? My nigga have you seen what the fuck this [U/I] dude did? They bragging, bro.

NS: Now they taking the easy thing, like yesterday she had to do [U/I] because they didn't want to give her no beef. Like, I don't understand that shit man. She probably had that shit.

CS: I'm trying to tell you. That's what I tell you.

NS: Yeah but H and C are doing it wrong. They need to fuck that day shit. Keep it the way it was, man. That's it. W...W and somebody in the morning, and the two girls in the night. That's it, bro.

CS: They can...they can even keep the young boy and, and H in the morning and W in the morning. They can keep both of them. They just gotta go by the law and relax my nigga.

152. Based on my training and experience, and in the context of this case, I understand that in the above conversation **NELSON SALCEDO** and **CARLOS PEREZ** expressed opinions about which set workers should be working which shifts on the drug set. They also expressed their displeasure with some of the DTO's new set workers. **NELSON SALCEDO** and **CARLOS PEREZ** also discussed their understanding that some of the residents near the 400-500 blocks of

Pine Street have threatened to call the police about the activities of the DTO's new set workers. **CARLOS PEREZ** and **NELSON SALCEDO** also discussed their wish that the residents would call **NELSON SALCEDO** or **CARLOS PEREZ** so that they could handle the problem without involving law enforcement. I believe that these communications reflect **CARLOS PEREZ's** and **NELSON SALCEDO's** responsibility for the lower-level DTO members and their drug-trafficking activities.

153. Law enforcement also intercepted a conversation on October 2, 2018 between **NELSON SALCEDO**, using Target Telephone 9, and **CARLOS PEREZ**, using (201) XXX-9323. A transcript of this conversation follows:

CP: Hello.  
NS: Yo, blah.  
CP: [U/I].  
NS: [U/I]. W came home?  
CP: Yeah, I was with him last night like till twelve-thirty last night. [U/I] walking out the doctor's. Got some blood taken out.  
NS: Oh.  
CP: Yeah, he was out last – I was talkin' to him last night. I was out there twelve thirty. Nigga still out.  
NS: Who? he was?  
CP: [U/I]. He was there. I rolled by to drop [U/I] off and he was there. I'm like what the fuck [U/I]. Yo.  
NS: Yeah. What'd he say?  
CP: [U/I]. He got caught with every – he got caught with everything.  
NS: I ain't trying to hear that shit, man.  
CP: That what he say, and he got papers to show it.  
NS: He ain't get caught with everything. Caught with everything dude, when he had...  
CP: Yo my nigger that's the [U/I]. I looked at him like, I'm listening to his story. I'm like yeah.  
NS: I ain't trying to listen to that shit, man. He didn't get caught with everything. 'Cause he was off the clock, man.  
CP: Huh?  
NS: He was off the clock.  
CP: He wa- he said he was on his way home. Leaving. He said he was leaving. He grab everything. He had four UI of yours. He had mines and the- and the D-Wop and eleven hundred dollars in his pocket.

NS: A hundred dollars in his pocket?  
CP: Eleven hundred.  
NS: Eleven hundred?  
CP: That's what he said last night. He said he had eleven hundred in his pocket, four of yours, one of mine, and three of D-Wop's.

154. Based on my training and experience, and in the context of this case, I understand that in the above conversation **CARLOS PEREZ** told **NELSON SALCEDO** that one of the DTO's drug-set workers, **WILLIAM CARRILLO** ("W"), was arrested by law enforcement with unspecified quantities of drugs that had been supplied by **NELSON SALCEDO** and **CARLOS PEREZ**, as well as with some drug-trafficking proceeds. This interpretation of the intercepted call is corroborated by law enforcement's analysis of arrest records, which reflect that **WILLIAM CARRILLO** ("W") was in fact arrested with quantities of different drugs on that date ("four of yours, one of mine, and three of D-Wop's").

#### **JOSE DIAZ**

155. **Summary.** **JOSE DIAZ** is believed by law enforcement to reside at a known address in Camden, New Jersey, based on physical surveillance and electronic surveillance, and also because **JOSE DIAZ** previously provided this address to law enforcement following his arrest on or about April 17, 2018. **JOSE DIAZ** is the user of Target Telephone 1 and other cellphones, set forth below, which he has used to engage in drug-trafficking activities. **JOSE DIAZ**'s role in the DTO is that of a shift manager who also conducts hand-to-hand transactions on occasion. Law enforcement has observed **JOSE DIAZ** through video surveillance measures while **JOSE DIAZ** engaged in street-level narcotics sales in this area. In addition, **JOSE DIAZ** has distributed heroin on multiple occasions to CHSs in the context of controlled purchase transactions, including on January 28, 2018; January 24, 2018; February 23, 2018, May 23, 2018, and June 25, 2018; on two

of these occasions, the controlled purchase transactions took place inside of **JOSE DIAZ**'s own home, and on the remaining occasions, the transactions took place in the vicinity of the 400-500 blocks of Pine Street.

156. **Criminal History.** **JOSE DIAZ** has a criminal history that includes: (1) a February 20, 2012 arrest by the Camden City Police Department that resulted in a felony conviction for manufacturing, distributing, or possessing with intent to distribute heroin, and a felony conviction for possessing controlled dangerous substances or an analog; (2) a May 30, 2012 arrest by the Division of Criminal Justice in Trenton that resulted in a felony conviction for possessing controlled drug substances on school property and a felony conviction for conspiracy to manufacture, distribute, or possess with intent to distribute heroin; and (3) a August 19, 2017 arrest by Camden County Police Department that resulted in a grand jury indicting **JOSE DIAZ** for possession of controlled drug substance. **JOSE DIAZ** also has multiple pending municipal court charges, including drug charges stemming from an arrest on or about February 7, 2018 and an arrest on or about April 17, 2018 regarding **JOSE DIAZ**'s drug activities on the 400-500 blocks of Pine Street in Camden, New Jersey.

157. **Identification.** **JOSE DIAZ** was identified as a member of the DTO through various means, including law enforcement's video surveillance of him engaging in hand-to-hand transactions on the 400-500 blocks of Pine Street; physical surveillance of **JOSE DIAZ** at his known residence while **JOSE DIAZ** was taking actions consistent with intercepted communications by the resident of the home, as set forth herein; identification by CHSs to whom **JOSE DIAZ** had sold drugs over the course of this investigation, in the context of hand-to-hand transactions; and a combination of physical and video surveillance and intercepted

communications over Target Telephone 1 and other Target Telephones, which show **JOSE DIAZ** conducting drug-trafficking activities that are consistent with the drug-related conversations that are being intercepted over these telephones.

158. **JOSE DIAZ** has been identified as the user of several different phone numbers for drug-trafficking over the course of this investigation. For example, I and other law enforcement officers believe that **JOSE DIAZ** previously used the cellular telephone number of (440) XXX-5049. This belief is based on the fact that during a controlled drug purchase transaction that took place between a CHS and **JOSE AGRON** on or about March 29, 2018, which law enforcement officers viewed via video surveillance, **JOSE AGRON** purported to call **JOSE DIAZ** regarding drug-trafficking activities. Law enforcement officers subsequently examined the toll analysis results for the telephone number associated with **JOSE AGRON**, based on information learned from the CHS, and learned that **JOSE AGRON** called an individual at (440) XXX-5049 at approximately the same time that **JOSE AGRON** purported to call **JOSE DIAZ**. Law enforcement then analyzed toll records for (440) XXX-5049 and learned that that number was subscribed to by an individual with the last name of Diaz.

159. Also, **JOSE DIAZ** was identified as the prior user of cellular telephone numbers (856) XXX-0801 and (305) XXX-8820, which he used to conduct drug-trafficking activities. **JOSE DIAZ**'s use of these numbers is based on the fact that **JOSE DIAZ** previously provided the telephone number (856) XXX-0801 to a CHS during a controlled drug purchase that took place on or about January 18, 2018. On or about May 15, 2018, **JOSE DIAZ** provided the telephone number (305) XXX-8820 to a CHS, and used this number to set up and conduct a controlled drug transaction of approximately 48 bags of purported heroin with the CHS on or about May 23, 2018.

160. **JOSE DIAZ** also was identified as the user of Target Telephone 1 over the course of this investigation. Originally, law enforcement learned about **JOSE DIAZ**'s use of Target Telephone 1 through the same CHS who had purchased purported heroin from **JOSE DIAZ** on May 23, 2018. On June 11, 2018, the CHS reached out to **JOSE DIAZ** on (305) XXX-8820 and did not get through to **JOSE DIAZ**; later that same day, the CHS obtained the telephone number of Target Telephone 1 through an associate of **JOSE DIAZ**. The following day, on or about June 12, 2018, the CHS spoke with **JOSE DIAZ** over Target Telephone 1. **JOSE DIAZ** confirmed that he was now using Target Telephone 1 for drug-trafficking activities, and **JOSE DIAZ** agreed to sell additional drugs to the CHS in the future. The CHS subsequently spoke to **JOSE DIAZ** on Target Telephone 1 and also exchanged text messages with **JOSE DIAZ** on Target Telephone 1 on June 25, 2018.

161. **Selected evidence.** **JOSE DIAZ** also was intercepted on numerous times over Target Telephone 1 while engaging in drug-trafficking activities, as discussed herein. For example, on June 19, 2018, law enforcement intercepted an incoming call over Target Telephone 1, used by **JOSE DIAZ**, from Target Telephone 3, used by **DWIGHT WILLIAMS**.<sup>32</sup> During this incoming call from **DWIGHT WILLIAMS**, the following conversation ensued:

DW: Yo.  
JD: Yo, I sent baby girl to you, she in front of you?  
DW: She not in front of me, she walked right.  
JD: The one with the book bag?  
DW: Yeah, call her back and tell.  
JD: Alright, let me...

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<sup>32</sup> On or about May 15, 2018, at the same time that **JOSE DIAZ** provided the CHS with his telephone number of (350) XXX-8820, as discussed above, **DWIGHT WILLIAMS** also was present and **DWIGHT WILLIAMS** provided the CHS with his own telephone number of (609) XXX-9586 ("Target Telephone 3"). Law enforcement analyzed records for Target Telephone 3 and learned that this phone was subscribed to in the name of **DWIGHT WILLIAMS**.

DW: Call her back and tell her the boy with the blue fanny pack, is, was, just talking to her, she went to Normy's bro.

JD: Alright.

DW: Alright.

162. Shortly thereafter, **JOSE DIAZ** placed a telephone call on Target Telephone 1 to **JASMIN VELEZ** at Target Telephone 2. This call ended almost immediately after **JASMIN VELEZ** picked up the phone, but **JOSE DIAZ** could be heard talking in the background about five "singles." Specifically, **JOSE DIAZ** stated, in sum and substance, "Go over with the nig, she just came outside. The girl, she just came outside, alright. Five singles." **JASMIN VELEZ** then said "Hello," and the call ended.

163. Shortly thereafter, **JOSE DIAZ** called back **JASMIN VELEZ** at the same number, Target Telephone 2, and the following conversation ensued:

JD: [U/I] you at?

JV: Right here, bout to walk out the door.

JD: Aight well look, um, this [U/I], walk straight down the house, and come down 4<sup>th</sup>, Pine, gonna be a girl with a pink shirt and a book bag, she want uh, she want uh, ah, 26 for 120...give her (200? [U/I]) and imam [S/L] bring you ten [U/I].

JV: ...Fine, you said...

JD: ...walk...

JV: ...walk all the way down fifth..

JD: Walk all the way down Pine, all the way to, ah, 'Tasha mom house, she right there.

JV: Aight.

JD: Give her one, give her 26, and take the 120 I'll bring you ten [U/I], I'm coming now.

JV: Aight.

JD: She got a pink shirt on, book bag, you know I'm talking about...

JV: Aight.

164. Investigators believe that the above exchanges between **JOSE DIAZ**, **DWIGHT WILLIAMS**, and **JASMIN VELEZ** reflects an attempt by **JOSE DIAZ** to arrange a drug sale involving an unknown female customer described as a "girl with a pink shirt and a book bag."

Specifically, investigators believe that **JOSE DIAZ** first attempted to send the female customer to **DWIGHT WILLIAMS** so that the customer could purchase some drugs, but then the customer “walked right” past **DWIGHT WILLIAMS**, and was “in front” of **DWIGHT WILLIAMS**. **JOSE DIAZ** subsequently attempted to send **JASMIN VELEZ** to interact with the female customer (“Walk all the way down Pine”) with instructions about the quantity of drugs that **JASMIN VELEZ** should provide to the female customer (“Give her one, give her 26”), the price that **VELEZ** should charge for the drugs (“take the 120”), and an assurance that **DIAZ** himself would provide additional drugs to **JASMIN VELEZ** (“I’ll bring you ten ...I’m coming now”). This interpretation of the exchange between **JOSE DIAZ**, **DWIGHT WILLIAMS**, and **JASMIN VELEZ** was confirmed and corroborated through video surveillance, in which investigators identified **JASMIN VELEZ** walking along Pine Street in a manner and time period consistent with this conversation.

165. On June 20, 2018, law enforcement intercepted an incoming call over Target Telephone 1, used by **JOSE DIAZ**, from Target Telephone 3, used by **DWIGHT WILLIAMS**, in which **DWIGHT WILLIAMS** told **JOSE DIAZ** that “Will needs” **JOSE DIAZ**, and **JOSE DIAZ** responded that **DWIGHT WILLIAMS** should “tell him to just put the shit in the crib and I’m about to call him.”

166. Shortly thereafter, law enforcement intercepted a call over Target Telephone 1 from **DWIGHT WILLIAMS** at Target Telephone 3, in which **DWIGHT WILLIAMS** arranged to meet **JOSE DIAZ** in “the back” of “the house,” which law enforcement confirmed via video surveillance to mean **JOSE DIAZ**’s known residence in Camden, for which law enforcement has obtained a search warrant. **DWIGHT WILLIAMS** subsequently notified **JOSE DIAZ** that he



was “in the back” of “the house,” and **JOSE DIAZ** confirmed that he too was “at the house.”

167. Shortly thereafter, **JOSE DIAZ** called back Target Telephone 3, but instead of speaking to **DWIGHT WILLIAMS**, **JOSE DIAZ** spoke to **WILLIAM CARILLO**, a.k.a. “Will,” who had been given the phone to use. The following conversation ensued:

WC: Yooo.  
JD: Aiight you listening to me?  
WC: Huh?  
JD: You listening to me? You inside?  
WC: Yeah I’m...I’m in the house.  
JD: Alright, well go to the basement.  
WC: Go to the basement?  
JD: Yeah.  
WC: Okay. Hol...Hold on let me lock the door because I thought you was coming so I left the door open for you. Okay. Okay? Oh shit. Okay.  
JD: Alright go down the basement. When you go to the basement, you know all that shit in the ceiling...that foil?  
WC: Hold on. Oh shit....Oh shit. Okay, okay I’m in the basement.  
JD: Alright you know all that shit that’s in the ceiling?  
WC: In the center?  
JD: The ceiling...That shit that’s in the ceiling.  
WC: No.  
JD: The fucking foil that’s in the ceiling. The cotton shit...Yoo!  
WC: I’m listening my bro...I don’t...I don’t...  
JD: Yeah but you’re not fucking answering me bro.  
WC: Uh huh.  
JD: You know the shit when you coming down in the basement? You know the sh... the yellow shit that’s in the ceiling?  
WC: Yeah the...uh...that sticky shit. That scratchy...  
JD: Alright now pull, pull, pull, pull one of them down. A bag gonna fall out. There’s twelve in there.  
WC: In front of me? Or....?  
JD: In front of you? Soon as you get down the ladder bro. Soon as you come down the ladder pull the first one.  
WC: Yo I pulled it bro. Ain’t nothing coming down out of this shit. Ahh!  
JD: Oh my fucking god. This..I’m coming bro...You in the fucking way bro.  
WC: I’m serious my nigga. Look, I’m pulling all this shit.

168. Approximately five minutes after this call ended, **JOSE DIAZ** used Target Telephone 1 to call Target Telephone 3, which **DWIGHT WILLIAMS** answered. **JOSE DIAZ**

asked **DWIGHT WILLIAMS** to “put Will on the phone real quick.” **WILLIAM CARRILLO** then came on the phone, and **JOSE DIAZ** told **WILLIAM CARRILLO**, “Yo, don’t let him know that you got that 2 until that 2 done. Act like it ain’t nothing.” **WILLIAM CARRILLO** agreed and stated that he “was gonna do that anyway.” **JOSE DIAZ** then instructed **WILLIAM CARRILLO**, “Alright, so as soon as you get that 2, just call me and I’ll grab it and then after that I’m gonna call Puto.”

169. Based on my training and experience, and in the context of this case, I understand that in this exchange **JOSE DIAZ** was using Target Telephone 1 to contact **DWIGHT WILLIAMS** and **WILLIAM CARRILLO** regarding a quantity of drugs that had been hidden inside of **JOSE DIAZ**’s residence. Ultimately, **JOSE DIAZ** instructed **WILLIAM CARRILLO** to dislodge the drugs from the ceiling of the residence and sell the drugs to other individuals. **JOSE DIAZ** then indicated that he was going to call “Puto,” that is, **JUAN FIGUEROA**, regarding additional drugs needed for the distribution activities of **WILLIAM CARRILLO** and others.

170. This interpretation of the intercepted communication is consistent with video surveillance footage for this time period, which reflected that during the same approximate time period as **JOSE DIAZ**, **DWIGHT WILLIAMS**, and **WILLIAM CARILLO** were communicating over Target Telephone 1, **JOSE DIAZ**, **DWIGHT WILLIAMS**, and **WILLIAM CARRILLO**, also approached the “back” of **JOSE DIAZ**’s “house” and appeared to enter the residence for a time period commensurate with the intercepted communication.

171. Additional intercepted communications involving **JOSE DIAZ**, such as those described in the section of the Affidavit below regarding **WILLIAM CARRILLO**, confirm that

**JOSE DIAZ** exercised control over the DTO's set workers.

**JUAN FIGUEROA**

172. **Summary.** **JUAN FIGUEROA**, aka PUTO, is believed by law enforcement to reside at a known address on Pine Street in Camden, New Jersey. based on physical and electronic surveillance by law enforcement. Based on the investigation described in this Affidavit, **JUAN FIGUEROA** has been identified by multiple CHSs as having a supervisory position within the DTO and **JUAN FIGUEROA**'s duties as a "runner" or manager include collecting money obtained from the sale of illegal narcotics and ensuring the steady stream of drugs from distributors/packers (e.g., **CARLOS PEREZ** and **NELSON SALCEDO**) to shift managers (e.g., **CHRISTOPHER VAZQUEZ** and **JOSE DIAZ**). During intercepted communications over Target Telephone 5 involving **CARLOS PEREZ** and **NELSON SALCEDO**, **JUAN FIGUEROA** was referred to as a "runner" for the DTO. Law enforcement officers also believe that **JUAN FIGUEROA** and other DTO members may be affiliated with the Bloods gang due to **JUAN FIGUEROA**'s statements on social media, his apparent depiction of Blood gang signs in social media photographs, and photographs of other individuals known by law enforcement to be gang members.

173. **Criminal History.** **JUAN FIGUEROA**'S adult criminal history includes a March 27, 2017 arrest by the Camden County Police Department that resulted in a felony conviction for the unlicensed Manufacture, Transport, Shipping, Selling or Disposal of a Weapon.<sup>33</sup> In addition,

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<sup>33</sup> In this incident, **JUAN FIGUEROA** was arrested in a car with two other individuals known to law enforcement, along with several firearms. One of these firearms was traced to a series of gang-related and drug-trafficking-related incidents near the 1900 block of Filmore Street.

**JUAN FIGUEROA** was arrested on August 18, 2018 by the Camden County Police Department and currently is facing several charges regarding an incident that took place on August 7, 2018 in which two law enforcement officers were shot (in an unmarked car, and in plain clothes) after having conducted surveillance earlier in the day in this investigation. The charges now pending against **JUAN FIGUEROA** include aggravated assault causing seriously bodily injury, aggravated assault, knowingly pointing a firearm, possession of weapon for an unlawful purpose, unlawful possession of a handgun, certain persons not to have weapons, criminal attempt murder and conspiracy to commit murder. Notably, after the shooting, other DTO members were intercepted in wire communications that appear to reference this shooting incident and that also appear to reference **JUAN FIGUEROA**.<sup>34</sup>

174. In addition to **JUAN FIGUEROA**'s drug-trafficking activities in the area of the 400-500 blocks of Pine Street, law enforcement officers also have observed **JUAN FIGUEROA** engaging in drug-trafficking activities near the 1900 block of Filmore Street through video and physical surveillance measures. Specifically, **JUAN FIGUEROA** was engaging in what law enforcement recognized, based on training and experience, to be hand-to-hand drug transactions. **JUAN FIGUEROA** also conducted duties such as being the lookout for other individuals involved in hand to hand drug transactions. The 1900 block of Filmore Street has been identified by law enforcement as a major concern for violence and drug distribution. During the time when **JUAN**

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<sup>34</sup> For example, after **JUAN FIGUEROA** was arrested for the attempted homicide charges, law enforcement intercepted communications in which other DTO members discussed a recent incident where one of **JUAN FIGUEROA**'s close relatives had visited the drug set on the 400-500 blocks of Pine Street. According to the DTO members whose communications were intercepted, the relative had visited the 400-500 blocks of Pine Street for the purpose of collecting money from DTO members in an effort to secure an attorney for **JUAN FIGUEROA**.

**FIGUEROA** frequently was observed on the 1900 block of Filmore Street, multiple violent acts occurred in that area. For example, on April 14, 2017, a homicide of an innocent bystander occurred along the 1900 block of Filmore Street involving a semi-automatic rifle. Also found at the scene of the crime were spent pistol rounds indicative of a back and forth shootout between two separate parties. To date, nobody has been arrested or prosecuted in reference to this incident.

175. **Identification.** From information provided by CHSs, law enforcement understands that during various periods of the investigation, **JUAN FIGUEROA** has employed **JOSE DIAZ** to manage the DTO's morning work shift for drug trafficking activities, and **JUAN FIGUEROA** has employed **CHRISTOPHER VAZQUEZ** to manage the DTO's evening work shift for drug trafficking activities. During **JOSE DIAZ**'s and **CHRISTOPHER VAZQUEZ**'s work shifts, **JOSE DIAZ** and **CHRISTOPHER VAZQUEZ** collected the money that they and other members of the DTO acquired from the sale of narcotics. **JOSE DIAZ** and **CHRISTOPHER VAZQUEZ** then provided an unknown amount of this money to **JUAN FIGUEROA**. Over the course of this investigation, through physical and video surveillance, **JUAN FIGUEROA**, **JOSE DIAZ** and **CHRISTOPHER VAZQUEZ** often have been observed by law enforcement on the 400-500 blocks of Pine Street while **JUAN FIGUEROA**, **JOSE DIAZ**, and **CHRISTOPHER VAZQUEZ** were operating in a manner consistent with the above information provided by CHSs.

176. Also, intercepted communications confirm **JUAN FIGUEROA**'s identity as a DTO member. For example, one of the phone numbers that **JUAN FIGUEROA** has used over the course of this conspiracy, (610) XXX-6591, has the mother of **JUAN FIGUEROA** as the listed subscriber, and has a listed subscriber address associated with **JUAN FIGUEROA**, as confirmed by physical surveillance. Intercepted communications over the Target Telephones

reflect that the user of this number takes actions within the DTO that are consistent with those of a “runner,” as **JUAN FIGUEROA** is known to be.

177. As another example, on or about May 15, 2018, **JUAN FIGUEROA** provided a CHS with the telephone number of (856) XXX-4656 as a contact number for **JUAN FIGUEROA**.<sup>35</sup> Subsequent communications intercepted over Target Telephone 1 confirmed that **JUAN FIGUEROA** used (856) XXX-4656 to communicate with **JOSE DIAZ** and others regarding drug-trafficking activities, and also confirmed that **JUAN FIGUEROA** had a supervisory position within the DTO as previously had been reported by CHSs.

178. **JUAN FIGUEROA** was identified as using the nickname “PUTO” through various sources of information, including information from a law enforcement database; intercepted communications in which DTO members reference “PUTO” and appear to be talking about **JUAN FIGUEROA** based on context; and **JUAN FIGUEROA**’s social media pages which include photos of him and also reflect that he uses the nickname “PUTO FIGUEROA.”

179. In addition, law enforcement intercepted a call on August 17, 2017 over Target Telephone 2 in which an inmate at Camden County Correctional Facility asks **JASMIN VELEZ** “Jose got locked up?” **JASMIN VELEZ** asks “When?” and the inmate says “Today. They said some shit with Puto and somebody with like a Sunni got locked up and all this other shit.” **JASMIN VELEZ** responded, “No, not my brother. My brother ain’t got nothing to do with that.” This phone call corroborates **JUAN FIGUEROA**’s identification as “PUTO” because it refers to

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<sup>35</sup> This CHS was later deactivated by law enforcement due to unauthorized criminal activity, but law enforcement continues to believe that the information provided by the CHS was reliable, and that information has been corroborated with other information as described herein.

**JUAN FIGUEROA**'s arrest for the August 7, 2018 shooting of the law enforcement officers as described above.<sup>36</sup>

180. **Selected Evidence.** During the investigation, **JUAN FIGUEROA** has used multiple telephone numbers to further the DTO's drug-trafficking activities, which is common practice for narcotics distributors. Through intercepted communications, CHS information, toll analysis, intercepted communications, and voice identification, law enforcement identified telephone numbers (610) XXX-6591 and (856) XXX-9453, and (856) XXX-4656 to be associated with **JUAN FIGUEROA**. Intercepted calls involving these numbers reflect that **JUAN FIGUEROA** used all three of these numbers to further his drug-trafficking activities within the DTO.<sup>37</sup>

181. For example, on or about June 20, 2018, **JOSE DIAZ** used Target Telephone 1 to call **JUAN FIGUEROA** at (856) XXX-4656. The following conversation ensued:

JD: Yo.  
JF: Yo Motherfucking uh Ky and them got nine plus the one I owe, that's the count.  
JD: Yo.  
JF: Yo you heard me?  
JD: What you say?  
JF: I said same regular count Ky got nine and one I owe.  
JD: Alright.  
JF: Alright.

182. Based on my training and experience, and in the context of this case, I understand

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<sup>36</sup> Although **JUAN FIGUEROA** was not actually arrested until August 18, 2018, his arrest warrant was made public on August 17, 2018. Law enforcement believes that the inmate was simply mistaken in thinking that **JUAN FIGUEROA** had actually been arrested on August 17, 2018.

<sup>37</sup> **JUAN FIGUEROA**'s use of the (610) XXX-6591 number was confirmed by law enforcement who were familiar with **JUAN FIGUEROA**'s voice on other intercepted communications (856) XXX-4656.

that in the above conversation, **JUAN FIGUEROA** and **JOSE DIAZ** were discussing the drug-trafficking activities of the DTO. **JUAN FIGUEROA**'s reference to "nine and one I owe" is a reference to a quantity of drugs that **JUAN FIGUEROA** was involved in collecting and supplying to other members of the DTO for further distribution and/or a reference to a quantity of monetary drug proceeds that **JUAN FIGUEROA** was involved in collecting and supplying to higher members of the DTO. As confirmed with toll analysis, **JUAN FIGUEROA** has used (856) XXX-4656 on several other occasions to communicate with other DTO members. Based on my training and experience, and in the context of this case, I believe that these additional communications involved the DTO's drug-trafficking activities.

183. On or about June 20, 2018, law enforcement learned that **JUAN FIGUEROA** used a different telephone number ((856) XXX-9453) to communicate with **JOSE DIAZ** on Target Telephone 1, as follows:

JD: Yo.  
JF: Damn nigga how many times I tried to call you?  
JD: Huh?  
JF: Look bro are you listening?  
JD: Who dis?  
JF: Bro, its Papo.  
JD: Oh whats up.  
JF: Jas, talking about she only got eight.  
JD: Yeah, I know I got the other one for her ([U/I] crosstalk between males).  
JF: You got the other one?  
JD: Yeah, I went to his house and grabbed it.  
JF: So you got two.  
JD: No I owe two but I aint got two but what I owe for.  
JF: So you got two the one you owe and the other one.  
JD: Yeah, yeah, yeah.  
JF: That's what I'm saying yeah, huh.  
JD: I said yeah...hello.

184. Based on my training and experience, and in the context of this case, I understand



that in the above conversation **JUAN FIGUEROA** was speaking with **JOSE DIAZ** about the quantity of drugs (“eight”) that **JASMIN VELEZ** (“Jas”) had available for distribution. **JUAN FIGUEROA** also was making sure that **JOSE DIAZ** had sufficient drugs on hand to supply the individual DTO members that **DIAZ** oversees, so that those individual DTO members could engage in further drug-trafficking activities (e.g., “you got the other one?” “so you got two” “so you got two the one you owe and the other one”).

185. Later that same day, **JOSE DIAZ** and **JUAN FIGUEROA** had another conversation over Target Telephone 1 and (856) XXX-9453, in which investigators believe that **JOSE DIAZ** asked **JUAN FIGUEROA** to bring **JOSE DIAZ** additional drugs for distribution: “just bring uh me that one five” and “just bring me what you gonna bring me.” **JUAN FIGUEROA** agreed to bring **JOSE DIAZ** more drugs for distribution, and also gave **JOSE DIAZ** direction as to how **JOSE DIAZ** should interact with others regarding drug-trafficking activities, stating: “aight bro I’m saying this nigga got five bro tell him to make sure he give you that whole five.” **JOSE DIAZ** apparently took **JUAN FIGUEROA**’s direction by stating, “aight I got you Ima tell him now.” This call is consistent with **JUAN FIGUEROA**’s known position as a DTO member who is senior to **JOSE DIAZ** and who gives **JOSE DIAZ** direction within the structure of the DTO.

186. As another example, the following day (that is, on June 21, 2018), law enforcement intercepted a conversation between **JOSE DIAZ**, using Target Telephone 1, and **JUAN FIGUEROA**, using (856) XXX-9453, in which the following exchange took place:

JD: Yo.  
JF: I said ain’t nobody outside?  
JD: Yeah, it’s Dutch and Jaz? The others? Probably took off.  
JF: What?

JD: It's Dutch and Jaz.  
JF: These niggas, they calling my phone [U/I].  
JD: Nah, they out there. Huh?  
JF: I said I'm right here, ain't nobody outside, but they call my phone like 5 times, they be bitchin'.  
JD: They out there.  
JF: Alright.

187. Based on the context of the conversation and my training and experience, I believe that in the above exchange, **JUAN FIGUEROA** contacted **JOSE DIAZ** on Target Telephone 1 because **JUAN FIGUEROA** was concerned that there were insufficient drug sales being conducted by members of the DTO, such as "Dutch" (**DWIGHT WILLIAMS**) and "Jaz" (**JASMIN VELEZ**), who were being supervised by **JOSE DIAZ**. **JUAN FIGUEROA** told **JOSE DIAZ** that **DWIGHT WILLIAMS** and **JASMIN VELEZ** were not out selling drugs in the area where **JUAN FIGUEROA** expected them to be ("aint nobody outside, but they call my phone like 5 times, they be bitchin'"), and then **JOSE DIAZ** assured **JUAN FIGUEROA** that the DTO members were, in fact, conducting drug-trafficking activities ("They out there"). The content and tone of this conversation, combined with other information learned by law enforcement during this investigation, reflects that **JOSE DIAZ** reports to **JUAN FIGUEROA** within the hierarchy of the DTO.

#### **DAVID VELEZ**

188. **Summary.** **DAVID VELEZ** is believed by law enforcement to reside at a known address in Camden, New Jersey, based on physical surveillance and video surveillance. Also, **DAVID VELEZ** previously provided the address that law enforcement believes him to reside at to a CHS during a controlled purchase transaction. **DAVID VELEZ** conducts hand-to-hand drug transactions, often in coordination with his brother **RAMON VELEZ**; intercepted

communications reflect that he also packages and prepares drugs for distribution. **DAVID VELEZ** has participated in multiple controlled purchase transactions with CHSs, including on June 29, 2018; July 3, 2018; and November 14, 2018.<sup>38</sup>

189. **Criminal History.** **DAVID VELEZ** has a criminal history which includes: (1) a January 21, 2009 arrest by the Camden City Police Department that resulted in a felony conviction for possessing controlled drug substances on school property and a felony conviction for conspiracy to manufacture, distribute, or possess with intent to distribute heroin; (2) a March 3, 2009 arrest by the Deptford Township Police Department that resulted in a felony conviction for manufacturing, distributing, or possessing with intent to distribute heroin; and (3) a February 14, 2013 arrest by the Camden County Sherriff's Office that resulted in a felony conviction for certain persons not to have possessed a weapon.

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<sup>38</sup> As noted above in the "Summary" section of this Affidavit, although **DAVID VELEZ's** controlled drug transactions with CHSs were not conducted on the 400-500 blocks of Pine Street, the purported heroin that **DAVID VELEZ** sold to the CHS on July 3, 2018 was stamped with the exact same "\$5" sign depicted on the drugs that CHSs purchased from other DTO members during controlled purchase transactions that took place on nine different occasions on the 400-500 blocks of Pine Street.

Recently, in or around early August 2018, law enforcement noticed that **DAVID VELEZ** and **RAMON VELEZ** appeared to be focusing their drug-trafficking activities in the area around their own residences, with customers who were contacting them directly, a separate drug supplier, and at least one other individual who operates similar to a "set worker." Law enforcement believes that this geographical shift is because **DAVID VELEZ** and **RAMON VELEZ** were worried about the increased police presence on the 400-500 blocks of Pine Street, following the shooting of the two officers on or about August 7, 2018, as discussed herein. Notably, **DAVID VELEZ** and **RAMON VELEZ** continue to discuss the drug-trafficking actions of other DTO members such as "Nas" (**NELSON SALCEDO**) and others. Taking into account the origin of the drugs sold, the intercepted conversations regarding drug-trafficking, and other circumstances, law enforcement continues to believe that **DAVID VELEZ** and **RAMON VELEZ** are part of the conspiracy described herein and remain actively involved in drug distribution.

190. **Identification.** Over the course of this investigation, law enforcement identified **DAVID VELEZ** through multiple means. For example, law enforcement observed **DAVID VELEZ** through physical surveillance as **DAVID VELEZ** engaged in street level narcotics deals outside his residence. Law enforcement also identified **DAVID VELEZ** from controlled drug purchases that **DAVID VELEZ** conducted with various CHSs on June 29, 2018, July 3, 2018; and November 14, 2018,<sup>39</sup> one of which is described in further detail in the section of the Affidavit regarding **RAMON VELEZ**, below.

191. In addition, DTO member **PAUL SALCEDO** frequently associates with **DAVID VELEZ** at **DAVID VELEZ**'s residence and parks his vehicle at that residence. More specifically, a vehicle registered to and known to be driven by **PAUL SALCEDO** aka LITTLE BRO, which is a Nissan Maxima bearing a New Jersey license plate ending in -KNF, is frequently identified via license plate readers in the vicinity of **DAVID VELEZ**'s known residence in Camden, New Jersey. **PAUL SALCEDO** was recently observed by law enforcement while **PAUL SALCEDO** was driving this vehicle on November 16, 2018 on the 400-500 blocks of Pine Street. Additionally, as confirmed by video surveillance, at approximately 12:30 p.m. on November 16, **PAUL SALCEDO** met with **CARLOS PEREZ** outside of **MEYLIN TRONCOSO**'s known residence in Camden. As described herein, both **PAUL SALCEDO** and **MEYLIN TRONCOSO** are known to be involved with packaging heroin for the DTO. Further, license plate reader data indicates that **PAUL SALCEDO**'s vehicle was parked or present at **DAVID VELEZ**'s known residence in Camden on the following occasions: November 14, 2018 at 10:36a.m., October 30,

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<sup>39</sup> **DAVID VELEZ** conducted the November 14, 2018 controlled purchase inside **DAVID VELEZ**'s known residence.

2018 at 7:27 p.m., October 29, 2018 at 7:46 p.m., October 26, 2018 at 10:33 p.m., October 23, 2019 at 7:30p.m., October 23, 2018 at 7:09 p.m., October 9, 2018 at 9:10 a.m., and October 4, 2018 at 9:07 a.m.

192. In addition, law enforcement also has intercepted communications of **DAVID VELEZ** while he was using Target Telephone 4. Law enforcement first identified **DAVID VELEZ** as the user of Target Telephone 4 because the original phone number for Target Telephone 4 ((856) XXX-8095) was provided to law enforcement by a CHS as a number that was used by **DAVID VELEZ**. Subsequently, on or about September 4, 2018, **DAVID VELEZ** changed his telephone number from (856) XXX-8095 to telephone number (856) XXX-6352. Because **DAVID VELEZ** kept the same IMSI number, there was no break in monitoring over Target Telephone 4.

193. Law enforcement officers who were familiar with **DAVID VELEZ**'s voice from prior intercepted communications over (856) XXX-8095 (i.e., Target Telephone 4) verified that **DAVID VELEZ** continued to use Target Telephone 4 to conduct the DTO's drug-trafficking activities after the corresponding phone number of Target Telephone 4 was changed to (856) XXX-6352. In addition, law enforcement officers intercepted a call over Target Telephone 4 on September 4, 2018, in which **DAVID VELEZ** told an unidentified male that it was "Dave" calling, and that (856) XXX-6352 was his new phone number ("Yo this my new number").

194. **Selected Evidence.** As stated above, **DAVID VELEZ** has sold drugs to a CHS on three separate occasions, in the context of controlled purchase transactions. For example, on July 3, 2018, law enforcement met with a CHS who was familiar with **DAVID** and **RAMON VELEZ**, in order to schedule a controlled drug transaction with **DAVID VELEZ**. The CHS had

a contact number for **DAVID VELEZ** corresponding to Target Telephone 4. At approximately 11:30 a.m. that day, the CHS called Target Telephone 4 in the presence of law enforcement. The call was answered by an individual whose voice the CHS recognized as that of **DAVID VELEZ**.

195. **DAVID VELEZ** and the CHS arranged to meet at a public place known to law enforcement so that the CHS could purchase heroin from **DAVID VELEZ**. The CHS drove over to the agreed-upon public place, and then law enforcement who were conducting surveillance watched as **DAVID VELEZ** exited his residence in Camden and entered an early 2000's white Nissan Maxima bearing a temporary New Jersey license plate ending in -435. The CHS parked in the parking lot at the agreed-upon place, and law enforcement conducting surveillance watched as **DAVID VELEZ**'s car pulled up alongside the CHS's car. **DAVID VELEZ** and the CHS conducted a controlled hand-to-hand purchase through the driver's side window of the CHS's car, and then **DAVID VELEZ** left the area. The CHS subsequently turned over an undisclosed amount of purported heroin to law enforcement.

196. Intercepted communications over the Target Telephones also reflect **DAVID VELEZ**'s participation in the DTO's drug-trafficking activities. For example, on August 17, 2018, law enforcement intercepted a call over Target Telephone 4, used by **DAVID VELEZ**, and (609) XXX-8433, used by **RAMON VELEZ**.<sup>40</sup>

RV: Hello?

DV: Yo, bro, hey, uh how much how much you say that shit was? That's not forty (40) right?

RV: No I told you twenty-five (25),

DV: You said twenty-five (25)?

RV: Yeah, twenty-five (25).

DV: You didn't even weigh that, you talking about twenty-five (25)

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<sup>40</sup> As set forth herein, **RAMON VELEZ** has used multiple phone numbers over the course of this investigation.

RV: Who?  
 DV: You, nigger.  
 RV: Nigger I got a scale at my house, bro,  
 DV: That's what I'm saying but you be restless sometimes, bro, I know you too well.  
 RV: Bro, listen, I took out five (5) last night.  
 DV: Yeah.  
 RV: And I took I took you over there, twenty-five point four (25.4).  
 DV: Alright.  
 RV: Yeah, that twenty-five point four (25.4) what I took over there. I know what I got.  
 DV: Yo, sit down and relax.  
 RV: Who over there?  
 DV: My son, man [U/I].  
 RV: Where's mommy at?  
 DV: I'm about to go get some more wax bags and shit from the crib.  
 RV: I got them at the house.  
 DV: Yeah. That's where I go grab them.  
 RV: Yeah, just put it together I guess, right now like fifteen (15) and I'll do the other ten (10).  
 DV: I just mixed that whole shit in together and shit.  
 RV: Oh you threw everything in there?  
 DV: Yeah you're gonna have to look me out my brother.  
 (talking over each other)  
 RV: Make sure you leave just leave five (5) to the side five (5) G's to the side.  
 DV: Sure?  
 RV: Yeah, leave five (5) to the side because, I be, I be like selling little grams here and there and shit for a hundred (100).  
 DV: Alright. I'm going to need a scale for that I'm going to, I was just going to try to, try to do the whole thing.  
 RV: Alright, just, just take out just a little bit, not, not that much, not the whole five (5), but at least like a gram or two to the side.  
 DV: Alright.  
 RV: Alright? Tambein.

197. Investigators believe that in the above exchange, **RAMON VELEZ** and **DAVID VELEZ** are talking about how they are packaging and selling drugs together ("wax bags and shit," "mixed that whole shit in together," "leave five (5) to the side because I be I be like selling little grams here and there and shit for a hundred (100)," etc.).

198. As another example, on August 28, 2018, at approximately 10:08 a.m., the FBI intercepted an incoming call over Target Telephone 4, used by **DAVID VELEZ**, and (609) XXX-

8433, used by **RAMON VELEZ** as follows:

DV: Yo, bro.  
RV: Yo, they just raided, bro.  
DV: Yeah.  
RV: Yeah.  
DV: What ya just left?  
RV: Nah, nigga. I'm in the fucking house, bro.  
DV: Get the fuck outta here.  
RV: Yeah, I'm in the fucking house, nigga they fucking raided.  
DV: The ain't nothing, You good? Everything got fucked or what?  
RV: My nigga, I flushed everything, bro. They took Bolo.  
DV: Damn, I'm about to slide around there now.  
RV: Nah, they still here, bro.  
DV: Alright.  
RV: They still here. I need you to get Cioni so, she can get my car from in front of fucking, um, (U/I) house Kevin's dad house n'shit. I got that shit locked away because they, they fucking, um, they fucking chased me, bro. They chased me, I fucking ran through the back and came up in the fucking crib n'shit.  
DV: Alright, I'm coming now, bro...  
RV: Fuck.  
DV: ...I'm going to go around there now. Alright.  
RV: Alright.  
DV: Alright.

199. Investigators believe that during the preceding conversation, **RAMON VELEZ** told **DAVID VELEZ** that his home had been visited by local law enforcement but that **RAMON VELEZ** had been able to dispose of the drugs that he had ("flush" them) before those drugs were detected by law enforcement. After checking records, law enforcement confirmed that the individual referenced as "Bolo" in the above conversation, whose identity is known to law enforcement and was verified by a CHS, was arrested on that same day at **DAVID VELEZ's** home.

200. On September 8, 2018, law enforcement intercepted another call about drug-trafficking activities over Target Telephone 4, used by **DAVID VELEZ**, and Target Telephone 7, used by **RAMON VELEZ**. The transcript of this call is as follows:



RV: Yo.  
 DV: Yo.  
 RV: What's up?  
 DV: I had got 3885 out of that but, but you know, I gotta put them single ones towards the what's the name make them 21'.  
 RV: Yeah [U/I].  
 DV: Huh?  
 RV: I said, that's good.  
 DV: Yeah but, um, and you know, what that's 38 with the 3 that he took 30, you know what I'm saying, well he took another one but that was...  
 RV: He gave you the money?  
 DV: Nah, he ain't give me no money.  
 RV: Oh, I'm about to go over there now, I just found out two of my boys fucking died and shit bro.  
 DV: Yeah?  
 RV: Yeah, my nigga Joey, that like one of my (stutters) connects and shit, I heard that nigga, I don't know how he died and shit, but my other boy ah Nas fucking ah bother and shit, Hov he had... I don't know if he had a heart attack or something, and he died yesterday  
 DV: Oh yeah, that's why his sister was saying some shit like that on Facebook, her brother or some shit like that.  
 RV: Yeah, he died yesterday and shit the funeral is Monday, but my nigga Joey, bro, I'm trying to find out what had happened, I think somebody killed him and shit.  
 DV: Damn that's crazy.  
 RV: Jose Rodriguez, Joey and shit, that's my dude bro, like when they told me that shit, I seen that shit on facebook I said nah bro this can't be, man.  
 DV: Damn.  
 RV: Yo, Imma, you got, I got, I got fucking...  
 DV: What happened?  
 RV: Hold on.  
 DV: I got 18 right here, but I gotta take one and put some singles ones to the rest of them.  
 RV: You got what?  
 DV: I got 18 right here, I'm 'bout to take one whole one so I can put loose ones and that's gonna leave you with two bags extra and shit on the side.  
 RV: Aight.  
 DV: I did the math, I'll do the math for you once I finish all this shit.  
 RV: Aight.  
 DV: Aight.

201. Law enforcement believes that in the above exchange, **DAVID VELEZ** and **RAMON VELEZ** were talking about their supply of drugs and potential drug proceeds ("I had

got 3885 out of that but but you know I gotta put them single ones towards the what's the name make them 21s," "I got 18 right here I'm bout to take one whole one so I can put loose ones and that's gonna leave you with two bags extra and shit on the side," etc.). Further, law enforcement understands that "Nas" is a reference to **NELSON SALCEDO**, who is one of **RAMON VELEZ**'s drug sources ("connects").

202. As another example, on September 10, 2018, law enforcement intercepted a call between Target Telephone 4, used by **DAVID VELEZ**, and Target Telephone 7, used by **RAMON VELEZ**, as follows:

RV: Hello.  
DV: Yo, where you at, bro?  
RV: At the house, why what's up?  
DV: Hey, yo, what's. What's you got, you got, you got, umm, that jersey, you got that stuff [I/A] jersey, right, thirty (30) and shit.  
RV: What you say?  
DV: You got that stuff [I/A] jersey, right, thirty (30), the number thirty (30).  
RV: Nahh.  
DV: Oh alright, nah, that shit is looking rusty and shit. Alright look, listen, umm, ahh, put that shit in, in a machine for me, yo. Cause I'm about to drop my, umm, my girl kids off to the ahh, the school and shit.  
RV: At the school?  
DV: Yea, I'm about to drop them off at the school, so I need to do that so I can get started.  
RV: Alright, yeah, this nigga didn't even come over here early this morning either.  
DV: Who you talking about Bolo?  
RV: Yeah  
DV: Yea, he did some dumb shit (I/A - talking over each other).  
RV: No cause he think I'm done shit, I know he not even gonna come, cause, he know I'm gonna smack the shit out of him, that's why he ain't fucking come.  
DV: Yeah.  
RV: Did some real dumb shit, bro, he he fucking, ahh, last night, I told him, I said yo, what you gonna do, bro, where you gonna stay at tonight cause you're not staying here, bro, you can't stay here and shit, so you gotta hurry up and leave, if you are gonna go stay at where you said you were gonna stay its almost one o'clock in the morning, bro, you're not staying here. He said, nah, nah, nah, I'm gonna go, gonna go. So I said, alright, well, hurry up, go. No, I want to finish this. I said, nah, go, it's getting to late, bro, go. So he was like, alright, let me get, let me get

the clothes and shit. So, he goes back outside and he's sitting the steps. I'm like; you bro, you ain't hear what I said, get your shit and go my nigga, like, come back tomorrow. Alright, alright, I'm go take a shit. So he go to the bathroom to go use the bathroom to supposedly take a shit, this nigga taking forever and I'm over here telling the old girl, that, that the lunkita, I said yo, this nigga in the bathroom, he ain't taking shit, I know what he doing. He hitting that thing, I'm not dumb, watch, I told her watch, watch. So he was taking forever, forever, he come downstairs. I said; yo, give me the money, hurry up, give me the stuff. So he gives me the money and then I pay him then I and I was like (Speaks in Spanish), he was all nervous and shit, oh, I, I, I'm quattro and forty five dollars(\$45). I said, four (4) and forty five dollars (\$45), what? he was like, yea, porque, umm, (continues in Spanish) and he is going to give me the ten dollars tomorrow and the two, the two he was give this person.

DV: So, that's eighty five.

RV: Yea, so he was like, the two I have to give to this person. I said bro, hold on, from the Mexicano (speaks in Spanish) he gives it to you the same fucking day because he calls me and lets me know, so, you're lying about that. He was like, nah, for real, I swear, he said he was going to give it me tomorrow. I said, alright, Bolo what ever, man, go ahead. (Speaks in Spanish) I knew he was lying, cause he always get the money the same day and he calls me and tells me. You know what I am saying, like, Bolo was fucking lying, I knew it (speaks in Spanish) oh my god, bro, ask Jigger, (speaks in Spanish). Jigger that's how mad I was when I seen that shit. I said: Yea, Jigger, he can have these four (4) bro, all four of them niggas won.

DV: So he tapping them like that, so the chick wasn't lying.

RV: Yea, she wasn't lying. She wasn't lying and shit, I gave, and I got to go get Sianne, so Sianne go switch my title over and shit because I already know he told Old Boy what I was plotting on, waiting to do to him and shit. You know what I am saying.

DV: Yeah.

RV: Old Boy got fired from his job and, and, Old Boy he been coming around and my car still under his name, so I got to get that shit switched, I'm get Sianne to get that shit switched over, so when he come around, I just going to let him have it. I'm. I'm smack the shit and everything, watch.

DV: With the skinny nigga right.

RV: Yeah.

DV: Yeah.

RV: Cause, he be, he been running his mouth at the job he works with the Mexican. He did, he thought that the other people wasn't gonna tell the Mexican, that he was telling the Mexican, yea, I feel disrespected by them, I gonna get every single one of them, watch, watch, I gonna do them dirty, watch, this, this, and that. So he was telling me this shit today. I was like, yeah [I/A].

DV: What made, What made him say that, though.

RV: Because, I'm quite sure Bolo already told him.

DV: Oh alright.  
RV: You know what I am saying.  
DV: Yeah.  
RV: That's why, cause Bolo runs his fucking mouth too much, so now I gonna to go set Sianne in a little bit so she can switch the title over to her name and when old, when he, when Old Boy come around, I'm straight fuck him up.  
DV: Hell yeah.  
RV: Fuck [I/A] up.  
DV: I've seen him the other day around there and shit.  
RV: Yea, he be creeping, he be creeping.  
DV: He be letting Bolo, yea be letting Bolo use the car, right.  
RV: Yep, so that's how I know Bolo ran his fucking mouth, Bolo don't know how to keep his fucking mouth shut, He don't shut the fuck up. He tells not even know he telling.  
DV: Heh.  
RV: He talks to much (Speaks in Spanish) I'm go around there, they are in there.  
DV: Alright.  
RV: Alright.  
DV: It's already in there.  
RV: Alright.  
DV: It's in the drawer, the first drawer.  
RV: Yea, you, I, I, I'm, I'm, I'm, I'm weigh, I'm, I'm weigh that fucking chicken and shit, bro, because it is kinda healthy and shit.  
DV: Nah, its more, its, its more than that, bro, I already know.  
RV: I think it is, I think it is.  
DV: Probably like, I'm say. I'm say twenty three (23).  
RV: Yea, I think its a little bit more. (laughs)  
DV: Alright.  
RV: Cause she was being really, really nice bout it. I'm go over there in a little bit.  
DV: Alright.  
RV: Alright.

203. Law enforcement believes that in the above exchange, **DAVID VELEZ** and **RAMON VELEZ** were talking about the quality of the drugs they are selling ("that shit is looking rusty and shit") as well as the preparation of those drugs ("putting the "shit" in the "machine"). **DAVID VELEZ** and **RAMON VELEZ** also talked about how another drug trafficker was not sufficiently discreet about the DTO's drug operations ("runs his fucking mouth too much," "He don't shut the fuck up. He tells not even know he telling," etc.).

### **RAMON VELEZ**

204. **Summary.** **RAMON VELEZ** is believed by law enforcement to reside at a known address in Camden, New Jersey. Over the course of this investigation, **RAMON VELEZ** has participated in direct sales of heroin and crack cocaine to CHSs, including on June 29, 2018; July 3, 2018; July 16, 2018; and October 23, 2018. **RAMON VELEZ**'s participation in the DTO has been corroborated by information from a CHS. Further, **RAMON VELEZ** has been observed by law enforcement officers, through video and physical surveillance measures, while **RAMON VELEZ** was engaging in what law enforcement recognized, based on training and experience, to be hand-to-hand drug transactions in the area of the 400-500 blocks of Pine Street.<sup>41</sup> **RAMON VELEZ** used Target Telephone 7 over the course of this investigation, and he has been intercepted on Target Telephone 7 engaging in drug distribution activities. Additionally, **RAMON VELEZ** has been intercepted over other Target Telephones, including Target Telephone 4 and Target Telephone 1, while speaking with other DTO members about drug distribution activities, including **RAMON VELEZ**'s drug-distribution activities in and around the 400-500 blocks of Pine Street.

205. **Criminal History.** **RAMON VELEZ**'s adult criminal history includes: (1) a July 22, 1999 arrest by the Camden City Police Department that resulted in a felony conviction for burglary; (2) a March 1, 2001 arrest by the Camden City Police Department that resulted in a felony conviction for resisting arrest and eluding after instruction; (3) a June 24, 2007 arrest by the Camden City Police Department that resulted in a felony conviction for theft/conspiracy; (4) an October 1, 2008 arrest by the Collingswood Police Department that resulted in a felony

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<sup>41</sup> For example, **RAMON VELEZ** was observed on June 23, 2018 via video surveillance while **RAMON VELEZ** was conducting hand-to-hand drug transactions on the 400-500 blocks of Pine Street at approximately 1:16 p.m., 1:23 p.m., and 7:00 p.m.

conviction for burglary; (5) a November 21, 2012 arrest by the New Jersey State Police that resulted in a felony arrest conviction for certain persons not to have weapons; and (6) a November 22, 2012 arrest by the Berlin Township Police Department that resulted in a felony conviction for burglary/entering structure.

206. **Identification.** Over the course of this investigation, **RAMON VELEZ** has been identified as a DTO member through various means. For example, **RAMON VELEZ** was identified through his participation in 3 different controlled purchase transactions with CHSs, as set forth herein, and he was also identified on the 400-500 blocks of Pine Street conducting hand-to-hand transactions.

207. Over the course of this investigation, **RAMON VELEZ** has been identified as the user of various telephone numbers, which he used to further the DTO's drug-trafficking activities. One such number was (609) XXX-8433. This phone number is a number that was provided to law enforcement by a CHS who knew **RAMON VELEZ** and who used this phone number to set up a controlled purchase transaction, as set forth in greater detail below. Also, the subscriber for this phone number is listed as **RAMON VELEZ**, and the address listed for the subscriber is **DAVID VELEZ**'s known address in Camden.

208. **RAMON VELEZ** also has used Target Telephone 7 to further the DTO's drug-trafficking activities, and law enforcement has intercepted communications on this number as set forth below. Law enforcement identified **RAMON VELEZ** as the user of Target Telephone 7 through voice recognition and other methods. For example, as set forth above, law enforcement was aware that **RAMON VELEZ** previously used the number 609-861-8433 to conduct his drug-trafficking activities within the DTO, and that he often contacted his brother **DAVID VELEZ** on

Target Telephone 4 in furtherance of these activities. From intercepted communications on both Target Telephone 4 and Target Telephone 1, law enforcement became familiar with **RAMON VELEZ**'s voice. On August 28, 2018, law enforcement intercepted an incoming phone communication on Target Telephone 4 from Target Telephone 7. The caller identified himself as "Ray" and "your brother," and the caller informed **DAVID VELEZ** that this was his "new" number.

209. **Selected Evidence.** Over the course of this investigation, **RAMON VELEZ** has been intercepted on the Target Telephones discussing his drug-distribution activities on and around the 400-500 blocks of Pine Street. For example, in an intercepted conversation on June 18, 2018 between **JOSE DIAZ**, utilizing Target Telephone 1, and **RAMON VELEZ**, using telephone number 609-861-8433, **RAMON VELEZ** informed **JOSE DIAZ** that **RAMON VELEZ** had just ended his shift working on the 400-500 blocks of Pine Street and that other set workers, such as **JASMIN VELEZ** ("Jasmin"), were still engaged selling drugs on the block. Here is a transcript of the conversation:

RV: Yo  
JD: Where you at pop?  
RV: Whats up?  
JD: Where you at?  
RV: On my way home.  
JD: Oh Ky and them was still out there?  
RV: Yeah Ky and Jasmin, I just left.  
JD: Aight.  
RV: Aight.

210. A few days later, in an intercepted conversation on June 23, 2018 between **JOSE DIAZ**, utilizing Target Telephone 1, and **RAMON VELEZ**, using telephone number 609-861-8433, **RAMON VELEZ** reported to **JOSE DIAZ** on the progress of his drug sales. **RAMON**

**VELEZ** also told **JOSE DIAZ** about a prior encounter that **RAMON VELEZ** had with law enforcement while he was engaged selling drugs on the 400-500 blocks of Pine Street. Here is a transcript of the conversation:

RV: Yo.  
JD: Yo.  
RV: Where you at? You still over your girls?  
JD: Yeah, I'm down the street.  
RV: Alright, I got uhh..three quads for you, I'm almost down the fourth one and shit. They on me bro.  
JD: What happen?  
RV: On me like a motha fucka. I said them pussies is on me like a mutha fucka, bro. Tell me mufuckin black sergeant or whatever the fuck he is and shit. Like uhh "If I see you again, you know what it is," and shit. I'm almost done my fourth one and shit. I had to come here over mommy house again, cooled out and shit. They told fuckin Will, they pulled up on 'em was like I know you ain't comin' out here today. U/I. That shit fuckin' crazy, bro. I don't know who the fuck callin' em' man. Who you think calling?  
JD: I don't know man, that shit is wack.  
RV: Hell yeah bro, I mean they be giving the description and everything bro completely and shit and they fuckin' deep as hell bro they comin' deep as hell, like they keep driving by, driving by, one is parked up man I'm like what the fuck? I'm almost done though the fourth one and shit.  
JD: Alright, call me when you start your last one.  
RV: Alright.

211. Based on my training and experience, and in the context of this case, I understand that in the above exchange **JOSE DIAZ** informed **RAMON VELEZ** that **RAMON VELEZ** should call **JOSE DIAZ** when **RAMON VELEZ** "start[s] [his] last one", which I understand to mean his last bundle of heroin, so that **JOSE DIAZ** can bring more heroin to **RAMON VELEZ**.

212. Law enforcement also intercepted a conversation on June 24, 2018 between **JOSE DIAZ**, using Target Telephone 1, and **RAMON VELEZ**, using telephone number 609-861-8433, as follows:

RV: Hello.  
JD: Yo pop.



RV: Where you at?  
JD: I'm up the street, why what's up?  
RV: Huh?  
JD: I'm up the street.  
RV: Who out there?  
JD: Will, I gave him five.  
RV: I can't hear you.  
JD: Will, I gave him five.  
RV: Alright, I'm on my way over there he fucking he ain't answering his mother fucking phone. I'm calling that shit, it going to answering machine. I'm coming anyway.  
JD: Ain't nobody at mommies house, U/I I laid the shit on the couch [U/I].  
RV: Alright.  
JD: [U/I]  
RV: Alright.

213. Based on my training and experience, and in the context of this case, I understand that in the above exchange **JOSE DIAZ** informed **RAMON VELEZ** that **JOSE DIAZ** had supplied **WILLIAM CARRILLO** with five bundles of heroin for distribution on the 400-500 blocks of Pine Street. **RAMON VELEZ**, meanwhile, informed **JOSE DIAZ** that **WILLIAM CARRILLO** was not answering his phone, and said that **RAMON VELEZ** planned on heading out to the 400-500 blocks of Pine Street to begin his shift selling heroin.

214. **RAMON VELEZ** also has participated in multiple sales of drugs to CHSs, in the context of controlled purchase transactions, as noted above in the section regarding his brother **DAVID VELEZ**. For example, on or about June 29, 2018, in the presence of law enforcement, a CHS who already knew **RAMON VELEZ** conducted a text message exchange with telephone number (609) XXX-8433, known to be used by **RAMON VELEZ**. In this exchange, **RAMON VELEZ** arranged for a drug transaction involving the CHS,<sup>42</sup> **RAMON VELEZ**, and **DAVID**

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<sup>42</sup> Law enforcement officers personally observed the CHS make the phone calls and text messages in this section and witnessed the CHS dialing the numbers and/or selecting the particular contacts to whom the communications were being made.

**VELEZ.** During the text message exchange, the following took place:

CHS: You working or your bro got anything I'm tyna come thru for 30 or more.

RV: I'm home got off early

CHS: Oh aight I'm omw down who you want me to go to. Like where to?

RV: Come through I got 2 grams for you for 150 come to where you met up with my brother how long you gonna be. You coming bro let me?

CHS: Ok sounds good I'm omw now. B there in 10 minutes or less.

215. Based on my training and experience, and in the context of this investigation, I believe that in the above exchange **RAMON VELEZ** is advising the CHS that the CHS should visit **RAMON VELEZ** so that **RAMON VELEZ** can sell a quantity of heroin ("2 grams") to the CHS for a quantity of United States currency ("150"). This is consistent with other information learned over the course of this case that **RAMON VELEZ**, **DAVID VELEZ**, and others are engaged in drug-trafficking activities.

216. Following the text message exchange between the CHS and **RAMON VELEZ**, law enforcement provided the CHS with a FBI recording device and a quantity of United States currency for the purchase of heroin from **RAMON VELEZ**. At the direction of law enforcement, the CHS traveled to the area where **RAMON VELEZ** had directed him to go, for the purpose of purchasing heroin from **RAMON VELEZ**. Upon arrival, the CHS sent a text message to **RAMON VELEZ** advising **RAMON VELEZ** that the CHS had arrived in the area. Law enforcement conducted video surveillance and physical surveillance and observed **DAVID VELEZ** exit the driver's side door of the white Nissan Maxima that **DAVID VELEZ** is known to drive, as previously described. **DAVID VELEZ** briefly walked in the direction of the designated area; **DAVID VELEZ** then turned back to speak with the CHS, who was parked directly behind the aforementioned white Nissan Maxima. The following is an excerpt of the conversation between the CHS and **DAVID VELEZ**, in sum and substance:

DV: Yeah he about to come out now and give it to you, aight.  
CHS: Oh Aight. You good.  
DV: He about to come out now, he just told me to tell you and shit. He didn't want you waiting too long.

217. Law enforcement officers who were conducting physical surveillance then observed **RAMON VELEZ** travel toward the CHS's vehicle. The following conversation then took place between the CHS, **DAVID VELEZ** and **RAMON VELEZ**:

RV: Guaranteed. You bag that shit up you get 80 to 90 bags.  
CHS: Ok.  
RV: Know what I'm saying.  
CHS: Ok.  
RV: So that's \$450.00 dollars you get out of it, you know what I'm saying.  
CHS: No I hear you, you know I don't take it and sell it, I use it but definitely I will hit you guys up.  
RV: Aight.  
CHS: Aight.  
RV: But naw I was thinking, you mise well grab grams because you make off better.  
CHS: Yeah.  
RV: Plus that shit hot as hell out there. I haven't been there in like two or three days because it's hot. They parked up on the block, the undercovers.  
CHS: Yeah.  
RV: I don't even like going out there that much and shit.  
CHS: No, I hear you but this is the same stuff though right?  
RV: Yeah same shit. I'm not going to give you nothing different and shit because I know that's what you like.  
CHS: No I appreciate it.  
RV: You make off better like that and shit so.

218. Based on my training and experience as a law enforcement officer, and in the context of this investigation, I know that the term "grams" refers to bulk heroin instead of individual dosages. Additionally, I understand that when **RAMON VELEZ** refers to it being "hot" and under covers being parked on the block is a reference to a large presence of law enforcement in the area of the 400-500 blocks of Pine Street.

219. Immediately after the above exchange, the CHS turned over the suspected heroin,

which the CHS had purchased from **RAMON VELEZ**, in exchange for a quantity of United States currency. Specifically, law enforcement officers received 2 grams of purported heroin, which the CHS had purchased from **RAMON VELEZ** for 150 dollars.

220. Later in the day on June 29, 2018, and in the presence of law enforcement, the CHS made a consensually-recorded call to on Target Telephone 4. During the conversation that ensued, the following exchange **DAVID VELEZ** took place:

DV: Hello.

CHS: Yo you just called me?

DV: Yeah I called by accident, my fault.

CHS: Oh aight, aight, aight man. Quick question, you gonna be around on Tuesday at all?

DV: Tuesday.

CHS: Yeah.

DV: For the umm, for the car or for?

CHS: For the car, I mean I'll probably need some more stuff by Tuesday anyway. I mean, I'm not sure if I could come down and pick some stuff up and take a look at the car because I'll definitely have the money by Tuesday. Like I said, I'm starting a job Monday and it's cash everyday so I mean I can definitely get the hundred bucks come Monday evening and come through Tuesday and see you. If you gonna be around.

DV: Yeah, yeah, umm just call my brother and he will call me but I'm gonna be around Tuesday, he might be at work.

CHS: Okay, okay so just give you a call Tuesday.

DV: Yeah but let him know first though. Call him and let him, so he can let me know so everything cool.

CHS: Okay.

221. Based on my training and experience as a law enforcement officer, and in the context of this case, I understand that when **DAVID VELEZ** referred to his "brother", **DAVID VELEZ** was referring to **RAMON VELEZ**.<sup>43</sup> In the above exchange, I believe that **DAVID VELEZ** was directing the CHS to call **RAMON VELEZ** so that the CHS could arrange future

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<sup>43</sup> My understanding of this familial relationship was confirmed by the CHS after the CHS reviewed photographs of **DAVID VELEZ** and **RAMON VELEZ**.

narcotics transactions directly with **RAMON VELEZ**, because **DAVID VELEZ** knows that CHS primarily is a drug customer of **RAMON VELEZ**. However, **DAVID VELEZ** also expressed that he would be willing to sell narcotics to the CHS directly, if **RAMON VELEZ** was not available.

222. Intercepted communications also reflect that **RAMON VELEZ** used his residence to store drugs for distribution. For example, on July 31, 2018, law enforcement intercepted an outgoing call over Target Telephone 4, used by **DAVID VELEZ**, to (609) XXX-8433, used by **RAMON VELEZ**, as well as an unidentified male who apparently was present with **RAMON VELEZ** at the time. The following conversation ensued:

RV: Hello.  
DV: Yo. I'm at the crib now, yo.  
RV: You're at my house?  
DV: Yeah.  
RV: Aiight, uh put this nigga on the phone so I can tell him, uh where it's at so he can give it to you.  
DV: Aiight. [UI] He's coming now. He's watching TV. Yo, I just sold some to this girl. She came over here this morning too, but then she bought some again.  
UM: Yo, bro.  
RV: It's in the uh, uh the cushion.  
UM: Oh it's in the cushion?  
RV: Ya heard?  
UM: Aiight.  
RV: In the cushion. The cushion. The cushion.  
UM: I just...that's what I said bro. The cushion.  
RV: Yeah, but you gotta like stick your finger, like really in there and...and find it in the hole cause I made the hole bigger, like. Look for it.  
UM: Aiight.  
RV: Look for it. I'm still on the phone.  
UM: I got it. Damn.  
RV: You got it out? You got it out?  
UM: Yeah. Jesus Christ.  
RV: Aiight the...the bottom um [Spanish] where I had the plate at. All the way in the bottom. You gotta open it real slow because the grinder is in there. You gotta...you gotta bend...bend the um grinder sideways in order to open it.  
UM: I already got it. The grinder...

RV: You got it out?  
UM: Yeah I went to open the drawer for the plate, and I saw the grinder in there.  
RV: Aiight uh you gotta get a straw for him.  
UM: You gotta get a straw bro. Yeah...[U/I] just went to the store.  
RV: Aiight tell him bro...tell him that I said that like 11 um g's there. He should get at least...at least...the most like 15..1600...  
UM: Aiight.  
RV: The less like 14.  
UM: Okay I got you.  
RV: You heard?  
UM: Yepp.  
RV: Aiight tell him to grind that shit up like real, real good. Let it sit for like 5, 10 minutes. Grind it again, you know what I'm saying? And then he can uh [U/I] it all in then chop it up. Chop it up real good and don't forget to fucking scrape the um the grinder again.  
UM: Aiight. I got you.  
RV: Aiight.

223. Based on my training and experience, and in the context of this case, I understand that in the above conversation **RAMON VELEZ** and an unidentified male individual were discussing the retrieval and preparation of a quantity of drugs from a location concealed in the residence where **RAMON VELEZ** was living ("at my house"). When **RAMON VELEZ** referenced the "grinder," I understand that he was referring to an appliance commonly used to grind and mix controlled substances such as heroin. In addition, I understand that when **RAMON VELEZ** instructed the unidentified male individual to "chop it up," **RAMON VELEZ** was instructing the unidentified male individual to divide the mixed drugs into smaller portions in preparation for packaging the drugs for further sale.

224. **RAMON VELEZ** also used Target Telephone 7 for drug-trafficking activities. For example, on August 31, 2018, law enforcement officers intercepted a text exchange between Target Telephone 4, used by **DAVID VELEZ**, and Target Telephone 7, used by **RAMON VELEZ**, as follows:

RV: Sorry, I'm on a call right now. oi have 23gz there bro  
DV: Bro u talk crazy is hell  
DV: Stop texting like that  
RV: Lol

225. Investigators believe that in the above text exchange, **RAMON VELEZ** was referring to a quantity of drugs that will be distributed on or around the 400-500 blocks of Pine Street ("23 gz") and **DAVID VELEZ** was encouraging **RAMON VELEZ** to stop texting about drug quantities in such explicit terms, to reduce the risk of detection by law enforcement ("Stop texting like that").

226. On September 4, 2018, law enforcement intercepted an outgoing call over Target Telephone 4 used by **DAVID VELEZ** to Target Telephone 7 used by **RAMON VELEZ**. The following conversation took place:

DV: Ay yo, you hearin' me? I was talking to Cheapo and shit and I told him like, if he was tryin' to hustle and shit. You know what I'm sayin'. Like, I need somebody to hustle for me and shit. He said hell yeah. I'll do that shit ASAP bro. He said, you know, even if - he said - he said you know I don't be owen' nobody nothin', bro. You know when I owe I give it back to you the next day or whatever. Like, you know what I'm sayin'. He talkin' about like - like when we be frontin' him and shit like that. Cuz he always paid me and shit. He might pay like...

RV: Yeah, he still owe...

DV: Yo, he almo - he - he probably be like two days late, but he'll pay.

RV: Yeah, his girl still owes me. He said he was gonna pay me back for his girl.

DV: Yeah, his girl - his girl still owe you, but he always pay (UI) pay that shit. Yeah.

RV: Yeah.

DV: It be slippin his mind. He forgot, but he said he - he gotchu though. Yeah. But he good though. Nigger [U/I] on shit. So...

RV: Yeah, uh...

DV: I mean if you want to start him today I - I - I rather do that today. He said he stay there all night whatever, it don't matter.

RV: Well when I get off work and shit, [U/I] because right now I just called...

DV: [U/I] not open?

RV: Hell no, I don't leave that door open. Mother fucker go in there and steal my shit.

DV: Nah, nah, I'm thinkin' that somebody was in the crib.

RV: Yeah, somebody in there. Fuckin um, uh, my - the Mexican girl's um, kids and shit.

DV: Oh, shit. What the fuck they doin' in there?  
RV: They moved in there yesterday.  
DV: Yeah?  
RV: Yeah, they moved in there yesterday.  
DV: Oh, that's – that's not a good look for the situation.  
RV: Nah, they just - no it's actually a good look. So that they don't think we doin' something. They only gonna be there a month, and then they leavin'.  
DV: (UI) so whatchu...  
RV: (UI).  
DV: You got 'em in the back then.  
RV: That's why we havin' it in the backyard and shit.  
DV: Alright, alright. Say no more. Then we ain't gonna talk about that no more on the phone. I gotta go get me a new - I gotta go get me a new phone cuz my shit tapped, bro.  
RV: Yeah, I think this one is too.  
DV: My girl - my girl - my girl - my girl smart and shit. She be knowin shit bro. She be tellin me like you know that my - my uh – my - my uh - my brother-in-law, he's a cop. And they know they be in the paddy wagon listening to a lotta tapped phones. It might be more than one, but they listening to all of 'em. And [U/I] whatever...  
RV: Yeah.  
DV: ...they want to really go into and listen to which one it is, they can do that. So I'm tryin to tell ya your phone is tapped because when you called me and then you were sayin hello. You couldn't hear me. And then that means that they recording then they gon sh - they gon throw it over to me so they could listen. And I was like, you know what, that does make sense.  
RV: Yeah, that shit be happening to my phone too. The other one. My other one.  
DV: She like be change your number, yo. Change your number and get another phone. But change...  
RV: You gotta throw away that phone. You gotta go to - throw away that - we gotta get some throw away phones bro. That's what we gotta do.  
DV: Yeah, yeah. But, this one right here I'm just gonna keep and then I'm gonna get me another one. Alright, I'm a call you right back...  
RV: Like I did.  
DV: ...I'm about to pay for this now. Alright.  
RV: Alright, yep.

227. Based on my training and experience, and in the context of this case, I understand that in the above conversation **DAVID VELEZ** and **RAMON VELEZ** were discussing the likely hiring of another individual named "Cheapo" for the purpose of distributing drugs ("hustle for me"). Both **RAMON VELEZ** and **DAVID VELEZ** also discussed purchasing new telephones



for the purpose of avoiding law enforcement detection. In particular, **DAVID VELEZ** warned **RAMON VELEZ** that **DAVID VELEZ** had received information from a female (“my girl”) about law enforcement wiretapping tactics (“they be in the paddy wagon listening to a lotta tapped phones. It might be more than one, but they listening to all of ‘em”). **DAVID VELEZ** then told **RAMON VELEZ** that **DAVID VELEZ** believes the communications on **RAMON VELEZ**’s phone (i.e., Target Telephone 7) are being intercepted by law enforcement (“I’m tryin to tell ya your phone is tapped”).

228. In addition to drug-trafficking activities, **RAMON VELEZ** also was intercepted while **RAMON VELEZ** was talking to his son, **JOSE DIAZ**, about **RAMON VELEZ**’s illegal possession of a firearm and his intention to use that firearm in a violent manner. On or about June 25, 2018, **JOSE DIAZ** used Target Telephone 1 to contact **RAMON VELEZ** at (609) XXX-8433, and the following conversation took place:

RV: Yo  
JD: Yo. Pop.  
RV: I’m about to get off of work and shit, I’ll come around now there.  
JD: Alright.  
RV: Did I tell you what happened yesterday?  
JD: Nah, what happened?  
RV: Fuckin’, the kid on that shit pulled out a gun on me.  
JD: Who?  
RV: That dude that had [U/I] at David and shit.  
JD: Yeah?  
RV: Last night when I came over and shit. Nigga pulled out a gun and shit. I told him I’ll be back, you pull a gun on me and I’ll be back. So I went and got my .45 on, went over there, and shit. I tell you, he got lucky, man, two bike cops pulled up and shit as I was coming to him and shit. Young boy who was down there in front of his house let me come in his house because he saw I had the gun and shit, he was like, “come inside. You’re brave man, don’t going doing something stupid, it’s not worth it, he’s all high on that fuckin’ wet.” [U/I] fuckin’ bullet by the time he pull that fuckin’ 12-gauge out, I’d knock his head off and shit. It was fuckin’ wetter than shit, trying to show off. I’m going to get him though.  
JD: Alright, well I’ll talk to you when you get around.

RV: Aight.

229. Based on my training and experience, and in the context of this case, I understand that **RAMON VELEZ** told **JOSE DIAZ** that **RAMON VELEZ** had retrieved his firearm and had intended to violently harm another individual who previously had “pulled out a gun” on **RAMON VELEZ**. I further understand that drug traffickers often own firearms for their protection as well as to further their drug-trafficking activities. This is true even when those drug traffickers previously have been convicted of felonies, like **RAMON VELEZ**.

### **ELISA RIVERA**

230. **Summary.** **ELISA RIVERA** aka ISHA is a DTO set worker who is believed by law enforcement to reside at a known address on Pine Street in Camden, New Jersey, which was the address provided by **ELISA RIVERA** to law enforcement during her most recent arrest on July 31, 2018. **ELISA RIVERA** has been intercepted over Target Telephone 2 engaging in conversation related to the distribution of narcotics with **JAMIN VELEZ**. **ELISA RIVERA** participated as a set worker for the DTO. Video and physical surveillance reflect that **ELISA RIVERA** is present on the 400-500 blocks of Pine Street on a near-daily basis for the afternoon shift of the DTO’s drug-trafficking activities; during this time, **ELISA RIVERA** has been observed engaging in hand-to-hand drug transactions and passing off proceeds from drug transactions to other DTO members.<sup>44</sup> As set forth in greater detail earlier in this Affidavit, in the

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<sup>44</sup> For example, video surveillance shows **ELISA RIVERA** on the 400-500 blocks of Pine Street on a near daily basis during the afternoon shift, engaging in hand-to-hand drug transactions, on the following instances: August 5, 2018 at approximately 3:56 p.m., August 17, 2018 at approximately 3:49 p.m., August 20, 2018 at approximately 7:14 p.m., August 27, 2018 at approximately 4:48 p.m., September 12, 2018 at approximately 11:47 a.m., October 2, 2018 at approximately 5:41 p.m., and October 17, 2018 at approximately 2:25 p.m..

section about **PAUL SALCEDO**, **ELISA RIVERA** has used telephone number (267) XXX-6168 to arrange illegal drug transactions, and **ELISA RIVERA** sold heroin to a CHS on the 400-500 blocks of Pine Street after being directed to do so by **PAUL SALCEDO**.

231. **Criminal History.** **ELISA RIVERA** has an adult criminal history that includes an arrest on July 31, 2018 by the Camden County Police Department for distributing a controlled dangerous substance and possession of a controlled dangerous substance. The July 31, 2018 arrest was made on the 400-500 blocks of Pine Street, and at the time of the arrest, **ELISA RIVERA** was in possession of approximately 3 bags of suspected heroin with the “dice” stamped packaging. As discussed throughout this Affidavit, the “dice” stamp is a distinctive stamp that is known to be used by the DTO on heroin packaging, based on various CHS controlled drug purchases and various intercepted calls between **CARLOS PEREZ** and **PAUL SALCEDO** regarding stamping and packaging the heroin for the DTO. Court proceedings for **ELISA RIVERA**’s arrest are still in progress. **ELISA RIVERA** also was stopped (but not arrested) by the Camden County Police Department while she was in the area of the 400-500 blocks of Pine Street on November 8, 2018.

232. **Identification.** **ELISA RIVERA** was identified as a DTO member, and the user of telephone number (267) XXX-6168, from the controlled purchase that **ELISA RIVERA** conducted with a CHS on September 26, 2018 at the direction of **PAUL SALCEDO**, as described earlier in this Affidavit. This identification was corroborated by a combination of intercepted communications and near-simultaneous surveillance activities in which law enforcement observed **ELISA RIVERA** taking actions consistent with the actions of the user of this telephone. For example, on July 30, 2018 – the day before **ELISA RIVERA**’s arrest, referenced above – law

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enforcement intercepted an outgoing call over Target Telephone 2, used by **JASMIN VELEZ**, to (267) XXX-6168. The following conversation ensued:

ER: Yo.  
JV: Yo, I need you right now. Somebody wants 20.  
ER: Aight, I'm coming right now.  
JV: She right, look, she about to hit the corner.

233. Based on my training and experience, and in the context of this case, I understand that in the above conversation **JASMIN VELEZ** and **ELISA RIVERA** were discussing the upcoming sale of drugs to a prospective customer on the 400-500 blocks of Pine Street in Camden, New Jersey. Notably, video surveillance reflects that shortly after the above exchange, **JASMIN VELEZ** and **ELISA RIVERA** met with one another near the 400-500 blocks of Pine Street, just as they had discussed.

234. Later that same day, law enforcement intercepted an outgoing call over Target Telephone 2, used by **JASMIN VELEZ**, to Target Telephone 5, used by **CARLOS PEREZ**. A draft transcript of a portion of the conversation is provided below:

CP: Yo.  
JV: Yo.  
CP: You owe me for three.  
JV: I know.  
CP: Oh...you not done the other two?  
JV: I'm on the last one.  
CP: So why you only came up with one?  
JV: Because I didn't pay all the money together.  
CP: Oh, ok babe. Well, let Hoz know if not [U/I] calls already started.  
JV: Well, you wanna talk to him? He's right here.  
CP: Nah, just tell him when he's done to give you the [S/L] G let him bang it out. It's gonna be out there, cause ain't gonna be none 'til later, like six o'clock 'til I'm done.  
JV: Aight.  
CP: Aight...which one you doing? The blue too?  
JV: Um now yeah.  
CP: Oh, aight.

JV: Isha left.  
CP: Isha left...why?  
JV: 'Cause she gonna be with Chris.  
CP: Aight, when I'm finished doing what I'm doing I'm a hit you up. Just let Jose know.

235. Based on my training and experience, and in the context of this case, I understand that in the above conversation **JASMIN VELEZ** and **CARLOS PEREZ** discussed the quantity of drugs that **JASMIN VELEZ** had remaining on hand for sale to customers ("I'm on the last one") and the amount of money she owed for previously fronted supplies of drugs ("You owe me for three"). Soon thereafter on the same day, law enforcement intercepted an incoming call over Target Telephone 2, used by **JASMIN VELEZ**, from (267) XXX-6168, used by **ELISA RIVERA**. The following conversation ensued:

ER: Tell uhh, your bro, uhh, to give you the joints so I can put it up.  
JV: He in here?  
ER: Yeah, his car is right there.  
JV: Aight, let me check.  
ER: Aight.

236. Shortly thereafter, law enforcement officers observed, via video surveillance, **JOSE DIAZ** at the front door of his residence in Camden, New Jersey. Law enforcement officers observed **JOSE DIAZ** open the door and invite **ELISA RIVERA** into the house. Shortly after, **ELISA RIVERA** and **JOSE DIAZ** emerged from the residence. **JOSE DIAZ** then walked toward a gold Nissan Maxima and **ELISA RIVERA** walked toward a black Nissan Maxima parked nearby.

237. Based on my training and experience, and in the context of this case, I understand that in the above conversation **ELISA RIVERA** directed **JASMIN VELEZ** to coordinate with her "bro," **JOSE DIAZ** to provide her with a quantity of drugs, which **ELISA RIVERA** referred

to as “the joints.” **JOSE DIAZ** then invited **ELISA RIVERA** into his house, as reflected in law enforcement’s contemporaneous surveillance, as described above; based on my training and experience, I believe that when **JOSE DIAZ** and **ELISA RIVERA** were in his house, **JOSE DIAZ** provided **ELISA RIVERA** with some drugs, consisted with the above intercepted communication.

238. **Selected Evidence.** Over the course of the investigation, as stated above, **ELISA RIVERA** was intercepted while engaging in drug-trafficking conversations. For example, on August 17, 2018, law enforcement intercepted an incoming call on Target Telephone 2 used by **JASMIN VELEZ** from (267) XXX-6168, used by **ELISA RIVERA**. During the incoming call from **ELISA RIVERA**, the following conversation ensued:

JV: Hello.  
ER: Yo.  
JV: Where you at? You on Pine?  
ER: Yeah.  
JV: Carlito there?  
ER: Yeah, yeah he down there.  
JV: No fuckin’ way. He still keep callin’ me (broken up).  
ER: (broken up) Right by that nigga.  
(both laugh)  
ER: He didn’t say shit.  
JV: He sick as hell.

[crosstalk]

ER: I got somebody that want to buy some White Girl.  
JV: A’ight, well I’m right here walkin passin Broadway  
ER: A’ight.  
JV: And this look like Hoz trap goin down Pine. [U/I]  
ER: Yeah yeah he, Nah, he he asked somebody for it.  
JV: Oh.  
ER: A’ight.  
JV: How you gonna ask for it if he know we don’t do nuthin’.  
ER: I know. But um, a’ight.  
JV: You should have told him you couldn’t do it

ER: I, I did. Because Chris, uh, grab some for him. But it's fine. Fuckin'. That was his anyways. 'ventually. Get it?

JV: Yeah

ER: ... later...

JV: ...yeah but the trap is really supposed to give it to you...

ER: Yeah...listen...um, when you come I got somebody want to buy the White Girl. I don't know how much. Yours.

JV: Who dat?

ER: Just come over here. The thing I let you [U/I] yesterday.

JV: Oh well, this nigga, that nigga that usually come to us that be one of [U/I] he right here on Broadway, so, I'm bout to see what he want. And I'm walkin' back that way.

ER: Mmm.

JV: A'ight.

239. Based on my training and experience, and in the context of this case, I understand that in the above exchange, **ELISA RIVERA** was contacting **JASMIN VELEZ** to determine if she had any cocaine. **ELISA RIVERA** informed **JASMIN VELEZ** that she had someone who wanted to purchase cocaine from her once she arrived back on location ("I got somebody that want to buy some white girl"). I understand that "Carlito" is a reference to **CARLOS PEREZ**, "Chris" is a reference to **CHRISTOPHER VAZQUEZ**, and HOZ is a reference to **JOSE DIAZ**.

240. On July 31, 2018, law enforcement intercepted an incoming call on Target Telephone 2 used by **JASMIN VELEZ** from (267) XXX-6168, used by **ELISA RIVERA**. During the incoming call from **ELISA RIVERA**, the following conversation ensued:

ER: They said ten minutes, she went to McDonalds, but um, I'm not on speaker?

JV: No.

ER: Alright uh, you'll let me do like four of them... from- from- from mine... that I got at home?

JV: I'll give you- I'll give you two- two bags so you can have ten dollars.

ER: You said you want me to do the jawns for you?

JV: Nah, look when I'm out there...

ER: Yeah...

JV: ... and there's people around just say that you gave me your profit to sell.

ER: Yeah.

JV: [U/I]

ER: Yeah.  
JV: So um, I'll do two bags. I'll give you the (U/I). And um, I'll give... I'll do four at least so I can just put [U/I].  
ER: Yeah [U/I]...how many you got?  
JV: I got eleven. [U/I]  
ER: Give 'em to me. I'll do 'em.  
JV: Alright. Alright, I'll mix it up or whatever, whenever [U/I].  
ER: Alright.  
JV: Alright.

241. Based on my training and experience, and in the context of this case, I understand that in this exchange, **ELISA RIVERA** was contacting **JASMIN VELEZ** to ask **JASMIN VELEZ** if **JASMIN VELEZ** could sell some heroin bags that **ELISA RIVERA** had at home so that **ELISA RIVERA** could earn extra money. **JASMIN VELEZ** stated she didn't mind and **JASMIN VELEZ** told **ELISA RIVERA** to give her eleven bags to sell. **JASMIN VELEZ** stated she would mix in the new bags with what she already had so no one would know ("...look when I'm out there...and there's people around just say that you gave me your profit to sell").

242. On or about August 7, 2018, at approximately 9:47 p.m., law enforcement intercepted a call between (267) XXX-6168, used by **ELISA RIVERA**, and Target Telephone 2, used by **JASMIN VELEZ**. The following conversation took place:

ER: Yo.  
JV: Ish?  
ER: Hmm.  
JV: What's the count in the quads I got, that I gave you for mine?  
ER: Um, ahhhh, let me jump in the car when I was done the thing. You got, one ready in a bag, with money, and then the, uh, the powder you have...ok I dont know, I got to jump in the car and get that.  
JV: [U/I] up to be three three.  
ER: Aight.  
JV: Aight.

243. Shortly thereafter, at approximately 9:53 p.m., law enforcement intercepted another call between **ELISA RIVERA** and **JASMIN VELEZ**, using the same two phone numbers. The



following conversation took place:

ER: Um, one ready, one money, then the powder, one powder, one money...[S/L] two and two, yeah...

JV: And I got one each.

[crosstalk]

ER: Alright, I'm pulling up right now. I got to come in your house to drop everything off.

JV: Aight.

244. Based on my training and experience, and in the context of this case, I understand that in the above conversations **JASMIN VELEZ** and **ELISA RIVERA** are talking about various quantities of cocaine and money involved in the DTO's drug-trafficking activities ("the quads I got," "the powder you have," "one ready, one money, then the powder, one powder, one money," etc.).

#### **JASMIN VELEZ**

245. **Summary.** **JASMIN VELEZ** is a DTO set worker who is believed by law enforcement to reside with her brother **JOSE DIAZ** at a known address in Camden, New Jersey, based on physical surveillance and electronic surveillance. Video and physical surveillance reflect that **JASMIN VELEZ** is present on the 400-500 blocks of Pine Street on a near-daily basis for the afternoon shift of the DTO's drug-trafficking activities. During these times, **JASMIN VELEZ** has been observed engaging in hand-to-hand drug transactions and passing off proceeds from drug transactions to other DTO members. In addition, **JASMIN VELEZ** distributed heroin to a CHS on June 25, 2018, in the context of a controlled purchase transaction that also included the participation of **JOSE DIAZ** and **ELISA RIVERA**. **JASMIN VELEZ** also has been intercepted on numerous occasions while engaging in drug-trafficking conversations. She is the user of Target

Telephone 2, as discussed herein.

246. **Criminal History.** **JASMIN VELEZ** was arrested on June 16, 2017; March 28, 2018; and October 24, 2018. The March 28, 2018 -- which was for outstanding warrants -- took place at the intersection of Broadway & Pine Streets, which is in the vicinity of the 400-500 blocks of Pine Street. The October 24, 2018 arrest was for drug charges stemming from an incident that occurred on the 400-500 blocks of Pine Street, but **JASMIN VELEZ** was apprehended at the intersection of Royden & Williams Streets. At the time of this arrest, **JASMIN VELEZ** was in possession of approximately 35 red plastic containers of cocaine. The June 16, 2017 arrest also resulted in drug charges, but was not in Camden. **JASMIN VELEZ**'s drug charges from the October 24, 2018 arrest remain pending, as do the charges stemming from the June 16, 2017 arrest.

247. **Identification.** **JASMIN VELEZ** was identified as a DTO member and the user of Target Telephone 2 through various sources of information. For example, various DTO members have referred to **JASMIN VELEZ** by her first name on intercepted communications with Target Telephone 2, in the context of drug-trafficking conversations. In addition, DTO members have talked about **JASMIN VELEZ** to other DTO members, sometimes referring to her by first name and sometimes referring to her as **JOSE DIAZ**'s sister, in a manner that corroborates **JASMIN VELEZ**'s various drug-trafficking activities on behalf of the DTO.<sup>45</sup> Also, **JASMIN**

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<sup>45</sup> In addition, other DTO members often reference "the girls" when discussing **JASMIN VELEZ** and **ELISA RIVERA**'s afternoon drug-trafficking activities on the 400-500 blocks of Pine Street. For example, as discussed elsewhere in this Affidavit, law enforcement intercepted a call between **NELSON SALCEDO** and **CARLOS PEREZ** on September 4, 2018 in which **NELSON SALCEDO** and **CARLOS PEREZ** lamented that the new set workers were causing problems and the neighbors were complaining. **NELSON SALCEDO** noted that "That shit was no problem when we had the regular people, man" and later in the conversation he stated that "...H and C are doing it wrong. They need to fuck that day shit. Keep it the way it was man. That's it. W...W and somebody in the morning and the two girls at night. That's it bro." Later

**VELEZ** was identified by a CHS following the CHS's purchase of purported heroin from **JASMIN VELEZ**, **JOSE DIAZ**, and **ELISA RIVERA**, which took place on June 25, 2018. Also, law enforcement has observed **JASMIN VELEZ** in video surveillance from the 400-500 blocks of Pine Street, taking actions on foot that are consistent with the actions purportedly being taken by the user of Target Telephone 2, as described on various intercepted communications.

248. **Selected evidence.** As set forth throughout this Affidavit, **JASMIN VELEZ** frequently has been intercepted while using Target Telephone 2 for drug-trafficking activities. For example, on or about June 19, 2018, **JOSE DIAZ** received a telephone call on Target Telephone 1 from **DWIGHT WILLIAMS** on Target Telephone 3 and told **DWIGHT WILLIAMS** about a female drug customer that **JOSE DIAZ** had sent to **DWIGHT WILLIAMS**. After learning that the drug customer had accidentally walked past **DWIGHT WILLIAMS**, **JOSE DIAZ** called Target Telephone 2 and spoke to **JASMIN VELEZ** about "the girl" and "five singles." Shortly thereafter, **JOSE DIAZ** called back **JASMIN VELEZ** at Target Telephone 2 and the following conversation ensued:

JD: [U/I] you at?  
JV: Right here, bout to walk out the door.  
JD: A'ight, well look, um, this U/I, walk straight down the house, and come down 4th Pine, gonna be a girl with a pink shirt and a book bag, she want uh, she want uh, ah, 26 for 120...give her (200? U/I) and imam [S/L] bring you ten [U/I].  
JV: ...Fine, you said...  
JD: ...walk...  
JV: ...walk all the way down fifth...  
JD: Walk all the way down Pine, all the way to, ah, 'Tasha mom house, she right there.

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on, he stated, "They...them two...them two girls should have the afternoon shift every day." Based on my training and experience, and in the context of this case, "H" and "C" are references to **JOSE DIAZ** and **CHRISTOPHER VAZQUEZ**, who manage the DTO's shifts on the 400-500 blocks of Pine Street, and "the girls" refers to **JASMIN VELEZ** and **ELISA RIVERA**, who are set workers who work the afternoon shift.

JV: A'ight.  
JD: Give her one, give her 26, and take the 120 ill bring you ten U/I, I'm comin now  
JV: A'ight.  
JD: She got a pink shirt on, book bag, you know I'm talking about.  
JV: A'ight.

249. Based on my training and experience, and in the context of this case, I believe that the above exchange reflects an attempt by **JOSE DIAZ** to arrange a drug sale involving a female customer. Specifically, I believe that **JOSE DIAZ** first attempted to send the female customer to **DWIGHT WILLIAMS** so that the customer could purchase some drugs, and when the customer walked past **DWIGHT WILLIAMS**, **JOSE DIAZ** subsequently attempted to send **JASMIN VELEZ** to interact with the female customer ("Walk all the way down Pine") with instructions about the quantity of drugs that **JASMIN VELEZ** should provide to the female customer ("Give her one, give her 26"), the price that **JASMIN VELEZ** should charge for the drugs ("take the 120"), and an assurance that **JOSE DIAZ** himself would provide additional drugs to **JASMIN VELEZ** ("ill bring you ten...I'm comin now"). Law enforcement subsequently identified **JASMIN VELEZ** walking along Pine Street in a manner and time period consistent with this understanding of the conversation.

250. As another example, on August 4, 2018 at approximately 1:59 p.m., **JASMIN VELEZ** received an incoming call on Target Telephone 2 from telephone number (215) XXX-2071, a telephone number believed to be used by **CARLOS PEREZ**. **JASMIN VELEZ** and **CARLOS PEREZ** engaged in the following conversation:

CP: Yo.  
JV: Wassup.  
CP: Whats going on?  
JV: Where you at?  
CP: Where that little nigga at bro?  
JV: I don't know, you keep asking for him every time I call you.

CP: Because, because, the muthafucka, the muthafucka can't get in contact with him bro.  
JV: Aight, well you shouldn't have never left him with nothing overnight.  
CP: It's been three days, bro.  
JV: Aight, well, I don't know. I know early this morning, uhh muthafucking Nas said, he was going to talk to you because. Cuz they could have got three sold this morning and he wasn't outside.  
CP: That's what I'm trying to tell you man.  
JV: Aight but I'm not worried about that, I'm worried about my drugs and my second shift so where is my drugs?  
CP: Look I will call you later because I'm working on it now.  
JV: Huh?  
CP: I'm working on it now.  
JV: Aight.

251. Based on my training and experience, I believe that in the above conversation **CARLOS PEREZ** and **JASMIN VELEZ** are talking about an unknown set-worker who was not conducting drug-trafficking activities on the 400-500 blocks of Pine Street because he ran out of drugs to sell. I believe that when **JASMIN VELEZ** stated, "I'm not worried about that, I'm worried about my drugs and my second shift so where is my drugs?" **JASMIN VELEZ** was telling **CARLOS PEREZ** that she doesn't care about the schedules of the other set workers; rather, she only cares about conducting her own drug-trafficking activities on her "second shift," i.e., her afternoon shift on the drug set at the 400-500 blocks of Pine Street. Also, **JASMIN VELEZ** reported that **NELSON SALCEDO** "Nas" was planning to talk to **CARLOS PEREZ** about the situation.

252. As discussed at length elsewhere in this Affidavit the sections regarding other DTO members, **JASMIN VELEZ** has been intercepted on numerous other communications while conducting drug-trafficking activities on behalf of the DTO.

### **DWIGHT WILLIAMS**

253. **Summary.** **DWIGHT WILLIAMS** AKA “DUTCH”<sup>46</sup> is a DTO set worker. Law enforcement has observed **DWIGHT WILLIAMS** through video surveillance measures while **DWIGHT WILLIAMS** engaged in street-level CDS sales in the area of the 400-500 blocks of Pine Street. Over the course of the investigation, **DWIGHT WILLIAMS** also has distributed purported heroin to a CHS, including on March 29, 2018, in the context of a controlled purchase transaction. As described herein, **DWIGHT WILLIAMS** is the user of Target Telephone 3, and as reflected in intercepted communications, **DWIGHT WILLIAMS** has used Target Telephone 3 over the course of the investigation to further the DTO’s drug-trafficking activities.

254. **Criminal History.** **DWIGHT WILLIAMS**’s adult criminal history includes: (1) an August 29, 2010 arrest by the Moorestown Township Police Department that resulted in a felony conviction for burglary; (2) an August 30, 2010 arrest by the Maple Shade Township Police Department that resulted in a felony conviction for receiving stolen property; (3) a November 6, 2011 arrest by the Burlington Township Police Department that resulted in a felony conviction for burglary; (4) an October 5, 2012 arrest by the Cinnaminson Police Department that resulted in a felony conviction for burglary; (5) a September 18, 2013 arrest by the Camden County Police Department that resulted in a felony conviction for theft of services and resisting arrest; (6) a June 26, 2017 arrest by the Camden County Police Department that resulted in a felony conviction for possession of marijuana; and (7) an August 8, 2017 arrest by the Camden County Police

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<sup>46</sup> **DWIGHT WILLIAMS**’s Facebook profile is in the name of “Dwight Dutchmaster Williams” and includes photos of **DWIGHT WILLIAMS**. Also, law enforcement has observed actions of **DWIGHT WILLIAMS** on video surveillance that are consistent with the actions of “Dutch,” as described in intercepted communications.

Department that resulted in a felony conviction for possession of marijuana.<sup>47</sup>

255. **Identification.** **DWIGHT WILLIAMS** was first identified as a DTO member and the user of Target Telephone 3 because on or about May 15, 2018, **DWIGHT WILLIAMS** provided the phone number corresponding to Target Telephone 3 to a CHS in the context of a face-to-face, drug-related conversation. **DWIGHT WILLIAMS** subsequently was intercepted on various Target Telephones, including Target Telephone 1, while **DWIGHT WILLIAMS** was using Target Telephone 3 in conversations regarding the drug-trafficking activities of the DTO. Also, Target Telephone 3 is subscribed to in the name of **DWIGHT WILLIAMS**. In addition, law enforcement observed **DWIGHT WILLIAMS** over video surveillance as he participated in hand-to-hand transactions, and **DWIGHT WILLIAMS** was identified by a CHS in connection with a controlled drug purchase that took place between the CHS and **DWIGHT WILLIAMS** on March 29, 2018.

256. **Selected Evidence.** As reflected in intercepted communications over the Target Telephones, **DWIGHT WILLIAMS** frequently has used Target Telephone 3 to conduct drug-trafficking activities on behalf of the DTO. A few examples of these drug-trafficking conversations already were described at length in the earlier sections of this Affidavit regarding **CHRISTOPHER VAZQUEZ** and **JOSE DIAZ**.

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<sup>47</sup> As set forth below, in the section of this Affidavit about **NAEEM SADLER**, **DWIGHT WILLIAMS** also was arrested on March 15, 2018, along with other individuals, after having been found in a parked car near the intersection of 5<sup>th</sup> and Pine Streets that contained individual packages of substances believed to be marijuana and substances that field-tested positive for cocaine. **DWIGHT WILLIAMS** was charged with Possession of Marijuana under 50 grams and released. **NAEEM SADLER**, meanwhile, was charged with Distribution of Cocaine and Possession of Cocaine. Notably, some of the cocaine found in the car was recovered from the groin area of passenger **NAEEM SADLER**.

257. In addition, **DWIGHT WILLIAMS** has been intercepted while warning other DTO members about the presence of law enforcement. For example, on June 18, 2018 at approximately 12:18 p.m., Target Telephone 3, used by **DWIGHT WILLIAMS**, received an incoming call from Target Telephone 1, used by **JOSE DIAZ**. **DWIGHT WILLIAMS** and **JOSE DIAZ** engaged in the following conversation:

DW: Where they parked?  
JD: Yeah.  
DW: They parked cuz.  
JD: Yeah don't bust no moves, they around. Don't do nothing.  
DW: Alright.  
JD: Alight.

258. I believe, based on my training and experience, that in the above conversation **JOSE DIAZ** was calling **DWIGHT WILLIAMS** to tell him not to engage in any drug distribution ("don't bust no moves") because the police were in the area of the 400-500 blocks of Pine Street.

259. As another example, on June 19, 2018 at approximately 11:17 a.m., **DWIGHT WILLIAMS** used Target Telephone 3 to engage in an outgoing call to Target Telephone 1, used by **JOSE DIAZ**. **DWIGHT WILLIAMS** and **JOSE DIAZ** engaged in the following conversation:

JD: Yo.  
DW: Yo, you outside?  
JD: Oh, uh, yeah, what's up?  
DW: Hustlin?  
JD: Yup.  
DW: You hustlin'?  
JD: I'm always...  
DW: Oh, cause, like, three traps text me, talking bout..."is somebody outside?"  
JD: Yeah, I'm sorry, just the cop there that's all...  
DW: Oh...alright.

260. Based on my training and experience, I believe that **DWIGHT WILLIAMS** was



calling **JOSE DIAZ** to confirm that **JOSE DIAZ** was on the 400-500 blocks of Pine Street selling narcotics. I believe that when **DWIGHT WILLIAMS** asked **JOSE DIAZ** if he was “hustlin’”, he was asking **JOSE DIAZ** if he was selling drugs on behalf of the DTO. Further, when **DWIGHT WILLIAMS** said “like, three traps text me, talking bout... ‘is somebody outside?’”, **DWIGHT WILLIAMS** was telling **JOSE DIAZ** that three drug customers (“traps”) had texted him asking if there was anyone on the 400-500 blocks of Pine Street from whom they could buy drugs. Intercepted communications such as these confirm **DWIGHT WILLIAMS**’s role as a set worker within the DTO on the 400-500 blocks of Pine Street.

261. **DWIGHT WILLIAMS**’s role as a DTO set worker also was confirmed by the controlled drug transaction that **DWIGHT WILLIAMS** conducted with a CHS on March 29, 2018. In this controlled drug transaction, which was recorded by the CHS, **DWIGHT WILLIAMS** sold a quantity of purported heroin to the CHS in exchange for a sum of United States currency.

#### **WILLIAM CARRILLO**

262. **Summary.** **WILLIAM CARRILLO** is a DTO set worker who is believed by law enforcement to reside at a known address in Camden, New Jersey, which was the address provided by **WILLIAM CARRILLO** to law enforcement during his most recent arrest on June 15, 2018. **WILLIAM CARRILLO** sold a quantity of purported heroin to a CHS on November 13, 2018 in the context of a controlled purchase transaction directed by **JAMEEL BYNG**, as discussed in the section of this Affidavit below regarding **JAMEEL BYNG**. Over the course of this investigation, **WILLIAM CARRILLO** has used telephone numbers (856) XXX-1143 and (856) XXX-4446 to conduct illegal narcotics transactions on behalf of the DTO. **WILLIAM CARRILLO** has been

intercepted over Target Telephone 1 engaging in conversation related to the distribution of narcotics with **JOSE DIAZ**. Law enforcement has observed **WILLIAM CARRILLO** via video and physical surveillance while **WILLIAM CARRILLO** engaged in street level narcotics sales.<sup>48</sup>

263. **Criminal History.** **WILLIAM CARRILLO** has an adult criminal history that includes: (1) an arrest on May 19, 1993 by the Camden City Police Department resulting in a felony conviction for manufacturing and or distributing a controlled dangerous substance; (2) an arrest on April 11, 1996 by the Camden City Police Department resulting in a felony conviction for aggravated manslaughter; (3) a February 9, 2007 arrest by the Westville Police Department resulting in a felony conviction for uttering forged documents; (4) an April 9, 2009 arrest by the Camden County Sheriff's Office resulting in a felony conviction for absconding from parole; (5) a March 26, 2013 arrest by the Camden Police Department resulting in a felony conviction for the use and or possession with intent to use drugs; (6) a March 6, 2014 arrest by the Camden County Police Department resulting in the felony conviction for possession of a controlled dangerous substance or analog; (7) a April 22, 2014 arrest by the Camden County Police Department resulting in a felony conviction for manufacturing a controlled dangerous substance and/or distribution and possession with the intent to distribute heroin.

264. **WILLIAM CARRILLO** also has pending charges resulting from a June 15, 2018 arrest by the Camden County Police Department. At the time of this arrest, **WILLIAM**

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<sup>48</sup> For example, video surveillance shows **WILLIAM CARRILLO** on the 400-500 blocks of Pine Street conducting hand-to-hand transactions on July 29, 2018 between 10:12 a.m. and 10:21 a.m.; August 21, 2018 at 1:14 p.m., and September 2, 2018 at 10:42 a.m.

**CARRILLO** was found to be in the vicinity of the 400-500 blocks of Pine Street with 15 bags of suspected heroin.

265. **WILLIAM CARRILLO** also has pending charges from a September 29, 2018 arrest by the Camden County Police Department. At the time of this arrest, **WILLIAM CARRILLO** was found to be in the vicinity of the 400-500 blocks of Pine Street with 90 red plastic containers of cocaine; 15 bags of heroin packaged with the “black dice” motif; and 4 purple bags of crack cocaine. This is consistent with the description of the arrest set forth in the earlier section of this Affidavit regarding **NELSON SALCEDO**, in which **NELSON SALCEDO** and **CARLOS PEREZ** discussed how **WILLIAM CARRILLO** had been arrested with “four of yours, one of mine, and three of D-Wop’s.”<sup>49</sup> As set forth herein, the “black dice” drug packaging is known to be packaging that is used by the DTO, based on various CHS drug purchases and intercepted calls between **CARLOS PEREZ** and **PAUL SALCEDO**.

266. **Identification.** As already set forth above in the section of the Affidavit regarding **JOSE DIAZ**, **WILLIAM CARRILLO** was identified through physical surveillance when he borrowed Target Telephone 3 to discuss the drugs that were hidden in **JOSE DIAZ**’s residence and was intercepted on Target Telephone 3 during that time. While **WILLIAM CARRILLO** was using Target Telephone 3, he was referred to as “Will” on the phone. Subsequently, intercepted communications on Target Telephones involving (856) XXX-1143 reflect that **WILLIAM CARRILLO** is using this phone based on voice identification by law enforcement officers familiar

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<sup>49</sup> In the context of this case, I understand that “four of yours” is a reference to 4 vials of powder cocaine, provided by DTO member **NELSON SALCEDO**; “one of mine” is a reference to 1 vial of crack cocaine, provided by DTO member **CARLOS PEREZ** and “three of D-Wop’s” is a reference to 3 bundles of heroin, provided by an unknown DTO member.

with **WILLIAM CARRILLO**'s voice, and also because the user of this phone is identified as "Will." Further, the content of the intercepted conversations over (856) XXX-1143 are consistent with law enforcement's understanding of **WILLIAM CARRILLO** as a set worker who works for **JOSE DIAZ**.

267. **WILLIAM CARRILLO** also was identified as the user of (856) XXX-4446, which **WILLIAM CARRILLO** used in furtherance of drug-trafficking activities. On September 2, 2018 at 9:37 a.m., **CARLOS PEREZ**, using Target Telephone 5, received a telephone call from the user of (856) XXX-4446. In this phone call, **WILLIAM CARRILLO** indicated that he needed additional drugs for distribution. Because **CARLOS PEREZ** could not get ahold of any of the shift managers, **CARLOS PEREZ** indicated that **CARLOS PEREZ** would supply **WILLIAM CARRILLO** directly with the requested drugs. **CARLOS PEREZ** stated, "I'm on my way down there now nigga. I'm going straight down there bro." At approximately 9:46a.m., a Nissan Versa bearing a New Jersey license plate ending in -JKG, which is known to be driven by **CARLOS PEREZ**, arrived on the 400-500 blocks of Pine Street. Shortly thereafter, **CARLOS PEREZ**'s car arrived at the 400-500 blocks of Pine Street, **WILLIAM CARRILLO** engaged in two hand-to-hand drug transactions at approximately 10:10 a.m. and 10:42 a.m., indicating that **WILLIAM CARRILLO** must have received additional drugs for distribution, which occurred right after **CARLOS PEREZ**'s representation that he was going to bring drugs for **WILLIAM CARRILLO**.

268. Similarly, on September 3, 2018, **WILLIAM CARRILLO**, utilizing (856) XXX-4446, spoke with **CARLOS PEREZ** on Target Telephone 5 regarding a lack of drugs available for distribution on the 400-500 blocks of Pine Street at approximately 10:18 a.m.. At

approximately 1:08 p.m., video surveillance reflected that **CARLOS PEREZ** arrived on the 400-500 blocks of Pine Street and engaged in a hand-to-hand transaction with **WILLIAM CARRILLO** and **JOSE AGRON**. Considering the timing and circumstances of this transaction, law enforcement believes that **CARLOS PEREZ** supplied drugs to **WILLIAM CARRILLO** in this transaction, just as **WILLIAM CARRILLO** had requested. Voice identification by law enforcement officers familiar with **WILLIAM CARRILLO**'s voice also confirmed that **WILLIAM CARRILLO** was the user of (856) XXX-4446.

269. **Selected Evidence.** As previously stated, over the course of the investigation, **WILLIAM CARRILLO** was intercepted while engaging in conversations in violation of the identified targeted offenses. For example, on June 18, 2018, law enforcement intercepted an outgoing call on Target Telephone 1, used by **JOSE DIAZ**, to (856) XXX-1143, used by **WILLIAM CARRILLO**. During the call, the following conversation took place:

WC: Yo.  
JD: Yo, why the fuck you ain't been answering your phone, bro?  
WC: Because the phone was home, I was in court all day nigga.  
JD: Bro you wasn't in court all day bro.  
WC: How, how you going tell me I wasn't in court all day?  
JD: Alright so where my, where my, where my money at?  
WC: Whatchu mean where your money at? All the cuats was there.  
JD: No nigga you owe me for fourteen. What is you talking about?  
WC: What do you mean I owe you for fourteen? Everything was given to, everything was given to Dutch.  
JD: No, no, Will, Dutch only had twelve, my nigga.  
WC: Whatchu mean Dutch only had twelve? I gave him everything, I gave him Thirteen, all together.  
JD: No, no, you and Dutch got to figure that out then my nigga. Cause I'm missing two [U/I] and that's going to come from you or him.  
WC: Alright.  
JD: I gave you sixteen last night my nigga.  
WC: I gave Dutch, I gave him thirteen [U/I].  
JD: Bro, Dutch gave me twelve this morning and went home.  
WC: And I gave, yo, I gave him thirteen [U/I].

JD: You not listening to me. My count was sixteen last night, I took two from you, what that leave you at?  
 WC: Yes.  
 JD: What that leave you at?  
 WC: But, listen to me, listen to me. He was trapping when I left, he was trapping. I left him thirteen [U/I], that's what I...  
 JD: You're not adding up, I left you sixteen last night my nigga.  
 WC: Yes, Yes.  
 JD: Well listen, listen, I'm telling both you all like this. That money better pop up tomorrow or I'm beating both you all up straight like that.  
 WC: Yo, Yo [U/I].  
 JD: Straight like that, cause I'm not coming out my pocket no more. If them two [U/I] don't come up, I'm beating both you all up straight like that.  
 WC: Yo, [U/I] you see how you be.

270. Based on my training and experience, and in the context of this case, I understand that in the above exchange **JOSE DIAZ** was contacting **WILLIAM CARRILLO** to get money that **JOSE DIAZ** felt he was owed for the drugs that **JOSE DIAZ** gave to **WILLIAM CARRILLO** and **DWIGHT WILLIAMS** aka DUTCH the previous day to sell on the drug set at 5th and Pine Streets in Camden ("I left you sixteen last night"). **JOSE DIAZ** said he did not receive all the money he was owed and advised **WILLIAM CARRILLO** that **WILLIAM CARILLO** should work it out with DUTCH to make up the shortfall or **JOSE DIAZ** would physically assault both of them ("That money better pop up tomorrow or I'm beating both you all up straight like that.").

271. As another example, on September 2, 2018, law enforcement intercepted an outgoing call between Target Telephone 5, used by **CARLOS PEREZ**, and (856) XXX-1143, used by **WILLIAM CARRILLO**. During the call, the following conversation took place:

WC: Yeah.  
 CP: Yo.  
 WC: Yo, he ain't got no more.

CP: Man, listen, [U/I] ...I don't need to be....I don't got...That's why I pay these motherfuckers for. I don't need to be going down there myself. That's the whole point. Stay way too fucking late to do shit bro.

WC: I told you they a bunch of re-re's bro.

CP: They a bunch of fucking retards bro. I just talked to your n...your unc....your nephew. And I'm like...and He's like... [U/I]....But why you didn't call? I been calling you since yesterday my nigga. Like yo, you good? Checking w...Y'all niggas don't like answering your fucking phones bro. Anyway....[Spanish: Did you tell [U/I] that he has to work it?]

WC: [Spanish: Who?]

CP: Little C got it.

WC: Little C got it? Chris?

CP: Chris. Yeah.

WC: That little retard [Spanish: I haven't see him either].

CP: [Spanish: Who is he working for, him or the nephew?]

WC: [Spanish: He is the one who [U/I] is picking up today]

CP: [Spanish: yes, but] He don't answer my phone call. [Spanish: he also has UI]

WC: Yeah I haven't heard from none of them.

CP: This is crazy, bro.

WC: I been out here since 6.

CP: And you...you and, hold on, little homey there, right?

WC: Huh?

CP: You and...[Spanish: You have your kid there right?]

WC: Si.

CP: Alright. Nah, nigga if I take these shits to you, you gonna fucking [Spanish: take the 20] the pesos bro. Fuck all this shit. Or I'm taking the 20 fucking dollars.

WC: That's right. That's right nigga. I'm gonna be here.

CP: Fuck all that shit bro.

WC: Yeah, yeah, yeah. I'll do it.

CP: [Spanish: He doesn't answer.] But I need that out there because I can't keep bringing shit out, bro.

WC: Yeah.

CP: And all these fucking quadres out bro. Nooo. Nooo. [Spanish: There's about [U/I] \$ in quadras outside]

WC: Mmm hmin. Yeah.

CP: I'm gonna call.

WC: Alright just call me when you want me to meet you at.

CP: I'm on my way down there now nigga. I'm going straight down there bro.

WC: Aiight.

CP: Aiight.

WC: Aiight.

272. In the above conversation, I understand that **WILLIAM CARRILLO**, who is a set worker, reported to **CARLOS PEREZ** that the DTO's drug set on the 400-500 blocks of Pine Street has run out of drugs to sell ("he ain't got no more"). **CARLOS PEREZ** got upset because he was having trouble getting ahold of the other DTO members who were supposed to be supplying the drug set with drugs ("He don't answer my phone call"). **CARLOS PEREZ** was not pleased that he had to do the job himself ("can't keep bringing shit out") because he pays other DTO members to do the job.

### **KALIEL JOHNSON**

273. **Summary.** **KALIEL JOHNSON** is a DTO set worker who is believed by law enforcement to reside at a known address in Camden, New Jersey, based on physical surveillance and video surveillance, and also because **KALIEL JOHNSON** previously provided this address to law enforcement following his arrest on or about October 08, 2018. **KALIEL JOHNSON** has been observed on a near-daily basis during the morning drug shift on the 400-500 blocks of Pine Street engaging in hand-to-hand transactions. In addition, **KALIEL JOHNSON** has been observed by law enforcement at a residence on Pine Street that law enforcement believes to be a stash house, and for which law enforcement already has obtained a search warrant. Specifically, **KALIEL JOHNSON** has been observed entering and exiting the residence while **KALIEL JOHNSON** was retrieving items that are believed to be drugs and providing those drugs to other DTO members on the 400-500 blocks of Pine Street. Also, **KALIEL JOHNSON** was arrested on October 8, 2018, on the 400-500 blocks of Pine Street, after having sold drugs to another individual. These drugs were packaged in purple packaging that was consistent with the packaging on the crack cocaine that CHSs have purchased from other DTO members on the block.



274. **Criminal History.** **KALIEL JOHNSON** has a criminal history which includes: (1) a February 1, 2013 arrest by the Camden City Police Department that resulted in a felony conviction for wandering/prowling to commit a CDS offense; (2) a February 13, 2013 arrest by the Camden City Police Department that resulted in a felony conviction for CDS on school property; (3) a October 18, 2013 arrest by the Camden County Police Department that resulted in a felony conviction for manufacturing, distributing, or possessing with intent to distribute CDS; (4) a May 28, 2014 arrest by the Camden County Police Department that resulted in a felony conviction for manufacturing, distributing, or possessing with intent to distribute heroin; and (5) an April 4, 2016 arrest by Monroe Township Police Department that resulted in a felony conviction for prohibited weapons/devices.

275. **KALIEL JOHNSON** also has pending drug charges stemming from an arrest on October 8, 2018 arrest by the Camden County Police Department regarding **KALIEL JOHNSON**'s drug activities on the 400-500 blocks of Pine Street in Camden, New Jersey, as referenced above. At the time of his arrest, **KALIEL JOHNSON** was in possession of a sum of United States currency, divided into small denominations that were found in multiple pockets, and folded in a way that local law enforcement recognize to be consistent with that of street-level narcotics distribution. **KALIEL JOHNSON** also was stopped by the Camden County Police Department while he was in the vicinity of the 400-500 blocks of Pine Street on October 13, 2018.

276. **Identification.** As set forth below, law enforcement has observed **KALIEL JOHNSON** through video surveillance while **KALIEL JOHNSON** engaged in street-level

narcotics sales in this area on multiple dates and at various times.<sup>50</sup> In addition, **KALIEL JOHNSON** was identified as the user of (267) XXX-1860, which was subscribed to by **KALIEL JOHNSON** in his actual full name. This telephone has been intercepted over Target Telephone 9 while **KALIEL JOHNSON** was engaging in drug-related conversations, as set forth below.

277. **Selected Evidence.** On October 5th, 2018, at approximately 12:01 p.m., **KALIEL JOHNSON** was observed over video surveillance conducting what law enforcement believes to be a hand to hand drug transaction with a unknown white male wearing a gray hoodie on the 400 block of Pine Street in Camden, New Jersey. During the course of the interaction, the unknown white male was observed approaching **KALIEL JOHNSON**. **KALIEL JOHNSON** and the unknown male engaged in a brief conversation, and then **KALIEL JOHNSON** removed a small plastic bag from the front of his pants. **KALIEL JOHNSON** then removed one or more items from the bag and handed them to the unknown male. In exchange, the unknown male handed **KALIEL JOHNSON** what appeared to be a sum of United States currency **KALIEL JOHNSON** and the unknown male then parted ways in separate directions.

278. On October 8th, 2018, at approximately 10:53 hours **KALIEL JOHNSON** was again observed through electronic surveillance conducting what law enforcement believes to be a hand to hand drug transaction with a unknown white female wearing a purple tank-top on the 400 block of Pine Street in Camden, New Jersey. During the course of the interaction the unknown

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<sup>50</sup> For example, video surveillance shows **KALIEL JOHNSON** on the 400-500 blocks of Pine Street on a near daily basis during the morning and afternoon shift, engaging in hand-to-hand drug transactions, on the following instances: September 25, 2018 at approximately 10:47 a.m.; September 27, 2018 at approximately 11:47 a.m.; October 5, 2018 at approximately 11:37 a.m.; October 8, 2018 at approximately 9:00 a.m.; October 12, 2018 at approximately 7:52 a.m.; and October 17, 2018 at approximately 11:11a.m.

white female was observed approaching **KALIEL JOHNSON**. **KALIEL JOHNSON** and the unknown female engaged in a brief conversation. **KALIEL JOHNSON** then removed a small plastic bag from the front of his pants. **KALIEL JOHNSON** then removed item(s) from the bag and handed them to the unknown female. In exchange, the unknown female handed **KALIEL JOHNSON** what appears to be U.S. currency. **KALIEL JOHNSON** and the unknown female then parted ways in separate directions.

279. On October 12th, 2018, at approximately 8:17 a.m., **KALIEL JOHNSON** was again observed through electronic surveillance conducting what law enforcement believes to be a hand to hand transaction with a unknown white male wearing a Eagles hoodie on the 400 block of Pine Street in Camden, New Jersey. During the course of the interaction the unknown white male is observed approaching **KALIEL JOHNSON**. **KALIEL JOHNSON** and the unknown male engaged in a brief conversation. **KALIEL JOHNSON** then removed a small plastic bag from the front of his pants. **KALIEL JOHNSON** then removed item(s) from the bag and handed them to the unknown male. In exchange, the unknown male handed **KALIEL JOHNSON** what appeared to be U.S. currency. **KALIEL JOHNSON** and the unknown male then part ways in separate directions.

280. **KALIEL JOHNSON** also was intercepted on Target Telephone 9 engaging in discussions about drug-trafficking. For example, on or about October 4, 2018, at approximately 10:20 a.m., **NELSON SALCEDO**, using Target Telephone 9, called **KALIEL JOHNSON** at (267) XXX-1860 and the following conversation took place:

KJ: Yo.  
NS: Yo bro, it's me. I'm about to hit the store now.  
KJ: Alright I'm bout to ride down there.  
NS: Alright.

KJ:    Alright.

281.   Based on my training and experience, and in the context of this case, I understand that “the store” was a reference to the 400-500 blocks of Pine Street, where **KALIEL JOHNSON** works as a set worker for the DTO and is supplied with drugs by higher-level DTO member such as **NELSON SALCEDO**. My understanding of the above conversation is that **KALIEL JOHNSON** told **NELSON SALCEDO** that he was going to go down to the 400-500 blocks of Pine Street (“I’m bout to ride down there”). Video surveillance reflects that shortly after the above conversation, **KALIEL JOHNSON** was present on the 400-500 blocks of Pine Street, along with **JOSE AGRON** and **JOSE DIAZ**.

#### **MEYLIN TRONCOSO**

282.   **Summary.** **MEYLIN TRONCOSO** is believed by law enforcement to reside at a known address on Pine Street in Camden, New Jersey, based on physical surveillance and video surveillance, and also because **MEYLIN TRONCOSO** previously provided this address to law enforcement following her arrest on or about October 14, 2018. **MEYLIN TRONCOSO**’s role in the DTO is that of a “set worker” on the 400-500 blocks of Pine Street. As described below, **MEYLIN TRONCOSO** has been intercepted while communicating with other DTO members such as **CARLOS PEREZ** regarding the DTO’s various drug-trafficking activities, including the preparation and packaging of heroin.

283.   **Criminal History.** **MEYLIN TRONCOSO** has a criminal history which includes: (1) pending charges related to an October 14, 2018 arrest by the Camden County Police Department which resulted in **MEYLIN TRONCOSO** being charged with possession of CDS, and possession with the intent to manufacture or distribute CDS. On October 14, 2018 uniformed

officers with the Camden County Police Department observed **MEYLIN TRONCOSO** and an unidentified male conducting what appeared to be a hand to hand transaction in front of her residence in Camden, New Jersey. As officers attempted to stop **MEYLIN TRONCOSO**, she fled into the residence. Officers followed her into the residence, at which point they observed her discard a plastic bag which was found to contain multiple purple, heat-sealed bags which, in turn, contained a white rock-like substance believed to be drugs.

284. **Identification.** Law enforcement has observed **MEYLIN TRONCOSO** through video surveillance while **MEYLIN TRONCOSO** engaged in street-level narcotics sales in this area on multiple dates and at various times. **MEYLIN TRONCOSO** used various locations to store and distribute drugs on the behalf of the DTO, including **MEYLIN TRONCOSO**'s known residence in Camden and various vehicles. **MEYLIN TRONCOSO** was identified as using cellular telephone number (856) XXX-8922 because that number is subscribed to MEYLIN TRONCOSO in her own name and at her known address, and toll analysis supports MEYLIN TRONCOSO's use of that number.

285. **Selected Evidence.** Over the course of the investigation, **MEYLIN TRONCOSO** has been intercepted while engaging in drug-trafficking activities. For example, on August 28, 2018, law enforcement intercepted a call over Target Telephone 5 used by **CARLOS PEREZ**, from (856) XXX-8922, used by **MEYLIN TRONCOSO**. This is a summary of the call that took place, which was translated from the original Spanish:

**CARLOS PEREZ** asks if the girls went out today, and **MEYLIN TRONCOSO** tells him no, saying she doesn't know why because Jasmin was supposed to go out. CP asks if she [Jasmin] is there, and **MEYLIN TRONCOSO** replies that she has checked outside a couple times and hasn't seen her. **MEYLIN TRONCOSO** says that **EISHA** asked that if **MEYLIN TRONCOSO** saw her to help her, because she is taking care of some things at

home. **MEYLIN TRONCOSO** states she has only seen Will. **MEYLIN TRONCOSO** says she will let him know if she sees her [Jasmin]. **CARLOS PEREZ** acknowledges.

286. Investigators believe that in the above exchange between **CARLOS PEREZ** and **MEYLIN TRONCOSO**, **CARLOS PEREZ** asked **MEYLIN TRONCOSO** check to see if other “set workers” are out on the block. **MEYLIN TRONCOSO** responded that she has checked outside for **JASMIN PEREZ**, referring to **JASMIN VELEZ**, a couple times of times but did not see her. **MEYLIN TRONCOSO** also stated that she saw **WILLIAM CARRILLO**, referring to **WILLIAM CARRILLO**. As set forth herein, both **JASMIN VELEZ** and **WILLIAM CARRILLO** are known to be “set workers” for the DTO on the 400-500 blocks of Pine Street Camden, New Jersey.

287. On October 8, 2018, law enforcement intercepted a call over Target Telephone 9 used by **NELSON SALCEDO**, from (856) XXX-8922, used by **MEYLIN TRONCOSO**. This is a summary of the call that took place, which was translated from the original Spanish:

**MEYLIN TRONCOSO** asks if she can meet **NELSON SALCEDO** to give him something. **NELSON SALCEDO** says that he’s on his way home. **MEYLIN TRONCOSO** says that she will save something for **NELSON SALCEDO**. **NELSON SALCEDO** asks if it’s one and **MEYLIN TRONCOSO** replies that they’re two. **NELSON SALCEDO** asks if **MEYLIN TRONCOSO** wants more and she replies “if you want.” **NELSON SALCEDO** says that he will go “down there” in 10 minutes.

288. Law enforcement believes that in the above exchange between **NELSON SALCEDO** and **MEYLIN TRONCOSO**, **MEYLIN TRONCOSO** asked to meet **NELSON SALCEDO** so that **MEYLIN TROCOSO** could give **NELSON SALCEDO** some drugs that have been prepared for distribution. **NELSON SALCEDO** then asked **MEYLIN TRONCOSO** if she would like more, which I believe to be a reference to more raw (non-prepared) drugs. **MEYLIN TRONCOSO** responded to **NELSON SALCEDO**, “if you want,” and **NELSON**

**SALCEDO** stated he would be down there in 10 minutes. Investigators believe that **NELSON SALCEDO** is going to give **MEYLIN TRONCOSO** more raw product for her to bag up for street level sales.

289. On September 1, 2018, law enforcement intercepted a call over Target Telephone 5, used by **CARLOS PEREZ**, from (856) XXX-8922, used by **MEYLIN TRONCOSO**. This is a summary of the call that took place, which was translated from the original Spanish:

Parties greet. **CARLOS PEREZ** asks how are things going and if it is okay like that. **MEYLIN TRONCOSO** replies that it is okay like that and asks if he used [U/I]. **CARLOS PEREZ** affirms, and asks if **MEYLIN TRONCOSO** tried it, to which **MEYLIN TRONCOSO** replies that she did and it is good. **CARLOS PEREZ** states that he had told her to wait until something good came along. **MEYLIN TRONCOSO** replies that this is good and the size is the best part of it. **CARLOS PEREZ** states that the thing is that it isn't leaving/producing too much, and adds that paying that way there won't be any money to be made. **MEYLIN TRONCOSO** replies that it is too big, and **CARLOS PEREZ** says that he was thinking about something done on weekly basis. **CARLOS PEREZ** suggest as an option, giving **MEYLIN TRONCOSO** and company something big at 1,000 and they [**MEYLIN TRONCOSO** and company] can keep 2 1/2 or 300. **MEYLIN TRONCOSO** tells **CARLOS PEREZ** that she is looking for the kids uniforms right now, so she will let **CARLOS PEREZ** know once she arrives over there. **CARLOS PEREZ** agrees.

290. Based on my training and experience, and in the context of this case, I understand that in the above conversation **CARLOS LOPEZ** asked **MEYLIN TRONCOSO** about the bulk heroin ("something good" as translated) that he gave to her ("the size is the best part of it," and "something big," as translated). **MEYLIN TRONCOSO** and **CARLOS PEREZ** discussed **MEYLIN TRONCOSO**'s preparation and packaging of the heroin for **CARLOS PEREZ** on a weekly basis. **MEYLIN TRONCOSO** and **CARLOS PEREZ** also discussed the costs and charges for **MEYLIN TRONCOSO**'s preparation and packaging of the heroin (with **MEYLIN TRONCOSO** keeping "2 1/2 or 300," as translated, for every "thousand," as translated).

291. Additionally, based on intercepted communications between **CARLOS PEREZ**

and **MEYLIN TRONCOSO**, intercepted over **CARLOS PEREZ**'s prior cell phone (Target Telephone 5), I believe from the intercepted calls and texts between them, that **MEYLIN TRONCOSO** and a family member that lives with her were packaging controlled substances in her residence for the DTO's street level distribution of narcotics outside her residence in the 400 block of Pine Street, and that evidence of the packaging operation, as well as other evidence of her participation in this conspiracy will be found inside the residence. For example on September 4, 2018 at approximately 4:27 p.m., **MEYLIN TRONCOSO** called **CARLOS PEREZ** and asked **CARLOS PEREZ** if he could bring her "a pair of slippers." **CARLOS PEREZ** tells her "maybe" but that at that moment, he did not have a car available. **MEYLIN TRONCOSO** then tells **CARLOS PEREZ** that she already finished that "other one pair," and that **CARLOS PEREZ** was supposed to give it (believed to be additional drugs) to her earlier, and that she now has "three orders." (This call was translated from Spanish to English).

292. On September 7, 2018, at approximately 6:59 p.m., **MEYLIN TRONCOSO** sent a text message to **CARLOS PEREZ** (the message was in Spanish and has been translated into English). **MEYLIN TRONCOSO** told **CARLOS PEREZ**:

Everything good. The rain fucking with us that's it.

293. On September 7, 2018 at approximately 7:09 p.m., **MEYLIN TRONCOSO** sent a text message to **CARLOS PEREZ** (the message was in Spanish and has been translated into English). **MEYLIN TRONCOSO** told **CARLOS PEREZ**:

I already know you. When I have less than half I have to tell you I don't have anymore so when you get here it will actually be gone hahaha.

294. Based on my training and experience, and the context of these calls and text



messages, as well as other facts known from the overall investigation, I believe that **MEYLIN TRONCOSO** is a set worker in the DTO, and that she also packages heroin at the direction of **CARLOS PEREZ**.

**WALDEMAR GARCIA**

295. **Summary.** **WALDEMAR GARCIA** is believed by law enforcement to reside at a known address in Camden, New Jersey, based on physical and video surveillance by law enforcement. Based on the investigation described in this Affidavit, **WALDEMAR GARCIA** is one of the DTO's set workers, and he has been intercepted on Target Telephone 5 talking with **CARLOS PEREZ** regarding the DTO's drug-trafficking activities on the 400-500 blocks of Pine Street, as well as regarding **WALDEMAR GARCIA**'s and **CARLOS PEREZ**'s drug-trafficking activities in another area of Camden known to law enforcement. **WALDEMAR GARCIA** also has been viewed on physical surveillance on multiple occasions, such as September 14, 2018 and September 17, 2018, while **WALDEMAR GARCIA** was meeting with DTO members such as **CARLOS PEREZ**. Some of these meetings were near the 400-500 blocks of Pine Street, while other meetings were at other locations.

296. **Criminal History.** **WALDEMAR GARCIA**'s adult criminal history includes: (1) a September 22, 2004 arrest by the Camden City Police Department resulting in a felony conviction for possession of a controlled-dangerous substance on school property; (2) a September 9, 2018 arrest by the Camden City Police Department resulting in a felony conviction for aggravated assault-attempt to cause significant bodily harm; (3) a March 3, 2013 arrest by the Camden City Police Department resulting in a felony conviction for criminal restraint- risk of serious bodily injury.

297. **Identification.** **WALDEMAR GARCIA** was identified as the member of the DTO through a combination of intercepted communications over Target Telephone 5, surveillance activities, records analysis, and open source law enforcement databases reflecting that **WALDEMAR GARCIA** is an associate of **CARLOS PEREZ**.

298. Over the course of this investigation, **WALDEMAR GARCIA** used the phone number (856) XXX-8502. This telephone number was subscribed to in **WALDEMAR GARCIA**'s own name. Further, this telephone number is linked to **WALDEMAR GARCIA**'s Facebook account, which is in the name of "Bebo Garcia" and has photos of **WALDEMAR GARCIA**.

299. **WALDEMAR GARCIA** has been intercepted while using the phone number (856) XXX-8502 for the DTO's drug-trafficking activities. For example, on August 24, 2018, law enforcement intercepted a call over Target Telephone 5, used by **CARLOS PEREZ**, and 856-XXX-8502, used by **WALDEMAR GARCIA**. During this call, **CARLOS PEREZ** agreed to meet **WALDEMAR GARCIA** so that **CARLOS PEREZ** could obtain the proceeds of a drug sale that **WALDEMAR GARCIA** had conducted earlier in the day. **CARLOS PEREZ** told **WALDEMAR GARCIA** that **CARLOS PEREZ** would come to meet with **WALDEMAR GARCIA**, who law enforcement knew to be living Camden.

WG: Yo.

CP: Where you at?

WG: My mom's.

CP: [U/I] I'm leaving out the door. You know what that means.

WG: Say it again?

CP: I'm leaving out the door. You know what that means.

WG: You...you coming to get this?

CP: Yeah but I'm saying what about the other...the other one?

WG: Yeah what happened with the other situation.

CP: I'm gonna go over there....I'm gonna go check on it right now. I gotta do it personally.  
WG: Yeah cause he keeps calling me and texting me. I just been avoiding his shit.  
CP: I'm gonna go handle it right...It's 10 dollars right?  
WG: Yeah, bro.  
CP: Alright I'm going over there...  
WG: And it would have been more than that, but...  
CP: I'm gonna go handle it right now. I'll call you. I'm going on my way to you right now.

300. Soon thereafter, at **WALDEMAR GARCIA's** home in Camden, physical surveillance captured **WALDEMAR GARCIA** and **CARLOS PEREZ** meeting together just as they had discussed doing in the transcript above ("I'm going on my way to you right now"). From this, in conjunction with the other evidence set forth above, law enforcement concluded that **WALDEMAR GARCIA** was the user of (856) XXX-8502 and a member of the DTO.

301. **Selected Evidence.** As previously stated, over the course of the investigation, **WALDEMAR GARCIA** was intercepted while engaging in conversations regarding the DTO's drug-trafficking activities. For example, on about September 4, 2018, investigators intercepted a series of drug-trafficking calls between Target Telephone 5, used by **CARLOS PEREZ**, and (856) XXX-8502, used by **WALDEMAR GARCIA**. Here is the transcript for one such call:

WG: Yo.  
CP: What's up?  
WG: You good or no?  
CP: No.  
WG: No?  
CP: You know it nigger.  
WG: Damn, man. How about them for me some purple socks?  
CP: No.  
WG: Huh?  
CP: No, I got one left, and I ain't even do it, it's for the Bodega.  
WG: Damn, man. I'm about to be on eight on that one. I got the rest of the shit, it's forty. For that I'm gonna be, cuz I got the same dudes calling me from yesterday too.  
CP: [U/I]

WG: I told you this was gonna happen, remember?

CP: [U/I] was gonna happen, it's crazy, cuz I have three of them for you but, he's supposed to bring me that one, you know, shake and bake.

WG: [U/I]

CP: He's in the Pocono's, he's coming tonight so you probably believe that gonna be a hard shaky shaky bake.

WG: We got the ball rolling for a little bit.

CP: Man it'll come back [U/I].

WG: Uh, I have another question, uh what's up with remember you said your other man might have some white girl around?

CP: My Tampoco yo he just left from here, he just left, everybody up early in the morning I'm like wow. Shit I got one left nigger and that's for the [U/I].

WG: Um hum.

CP: And I'm thinking about putting it together now. Shit, I let it go for \$275.

WG: Shit.

CP: That's what I'd get.

WG: I know, I know, I'll see what he say, man, I know he ain't gonna push, I'm gonna try to push (three so that you could make something but I know he ain't gonna do it.

CP: If I give it too you at \$275, I'm losing at least \$25 dollars, because if I [U/I] I'm gonna get back three.

WG: That's what I'm saying he's giving me for two I'm gonna tell him three see what he say, he only want one but I got the other dude that wanted the six too

CP: [U/I] You got to let them know that shit went up man, if not, tell them to go see the other guy.

WG: I boost the price up for a set of two, I'm selling at \$275, so I can make \$25.

CP: Yeah, man.

WG: So uh.

CP: Let me tell you something, you better start letting them know you ain't nothing out, that shit going up.

WG: Bro, I know you see they been paying the price now. Now they been paying the price, you you ran out so.

CP: [U/I] going like water.

WG: Let me see what I'm gonna tell this guy. Even if you put this shit together, the purple socks you can't do one?

CP: No, because if I put it together, I'm gonna leave it for the [S/L] Bizzat.

WG: Damn, they still got to wait until later on tonight or tomorrow.

CP: Later on because my man trying to get me a couple of them. At least like three. I just keep this to maintain myself. You know if I put it together I already told you, only three comes out.

WG: Yeah, yeah, but I'm just saying, but that's good enough for right now. Just whenever you get situated, because I got them white people already calling me.

CP: Yeah I know but I'll put it for them [U/I] I'll leave it [U/I].

WG: [U/I]

CP: \$275, it'll go right now like hot cakes.  
WG: I'm gonna call right now, see what he say.  
CP: Alright.

302. Law enforcement believes that in the above conversation, **WALDEMAR GARCIA** and **CARLOS PEREZ** were discussing a shortage in their supply of drugs, their asking prices, and their potential financial losses. **WALDEMAR GARCIA** wanted some "purple stuff" because the repeat customers were requesting it, but **CARLOS PEREZ** stated that he had only one left, which he was holding for another individual. **CARLOS PEREZ** later offered to sell it to **WALDEMAR GARCIA** for \$275, assuring him that "it'll go right now like hot cakes."

303. Later that same day, **CARLOS PEREZ** and **WALDEMAR GARCIA** had another conversation over Target Telephone 5 and (856) XXX-8502, in which investigators believe that **WALDEMAR GARCIA** was speaking with **CARLOS PEREZ** about distributing the remaining CDS in **WALDEMAR GARCIA**'s possession without making a profit. They go on to discuss acquiring new CDS at a reasonable price from a supplier:

CP: Hello.  
WG: Yo, you still have that Vick?  
CP: Yeah, but you already know.  
WG: Huh?  
CP: You already know.  
WG: Yeah, uh that's what I'm saying they might get it at that price. I ain't making nothing but...  
CP: [U/I]  
WG: But as long as we get rid of it.  
CP: If he's going up like that it's going to be three.  
WG: [U/I]  
CP: Anyway what's up?  
WG: I don't know if he can do three.  
CP: Hey, you're the one that stays with him. They know what they want or they're going get ridiculous, anyway, what's up? You coming over or what?  
WG: Well, I'm trying to get dude now to see what he's saying and shit. 'Cuz he only gets, he only gets one.  
CP: Yeah, I told you.

WG: This ain't the other motherfucker that I can tax, tax.  
 CP: I know but be patient, I think, today's the day.  
 WG: I'm patiently waiting, you know, shit.  
 CP: Let's see what numbers they give me over there.  
 WG: Alright so I'll tell him to give me a couple minutes.  
 CP: So if they give you a good number you know we talk.  
 WG: Alright.  
 CP: What about your donations? Ain't your donations books up?  
 WG: Huh?  
 CP: Ain't your donations books up?  
 WG: Ain't my what?  
 CP: Your donations. Who we are...  
 WG: I'm about to see what I got now, cuz I got the uh the thing for the purple but I need more purples...  
 CP: I told you that, that Vick that you got out there, that got be done.  
 WG: Oh no, I got like three little singles around laying around. Not the whole, uh thing.  
 CP: Listen when you come over here just stay outside and I'll come outside.

304. In the above conversation, I understand that **WALDEMAR GARCIA** and **CARLOS PEREZ** are discussing various quantities of drugs (e.g. "purples" and "Vicks," which are coded words for quantities of drugs, as described herein).

305. On September 7, 2018, law enforcement intercepted a call over Target Telephone 5 to (856) XXX-8502, used by **WALDEMAR GARCIA**, in which the following exchange took place:

WG: Yo.  
 CP: Yo, what's up?  
 WG: Go on.  
 CP: Nothing, man. I overslept.  
 WG: Oh, I was about to, you just got up?  
 CP: Yeah, about a half hour ago. Calling everybody and now they're calling me.  
 What's good bro?  
 WG: Wanna do it?  
 CP: Nah bro, it's real bad now, kinda real bad.  
 WG: [U/I]  
 CP: It's real bad, man, whoever got it got it and not tinting it, bro. [U/I] Old Boy. I haven't seen Old Boy go crazy, not crazy, I never seen him like that. He's like, damn, yo, he been around, he don't come out the house nigga.  
 WG: Oh shit,

CP: That serious, bro. My uncle was like, must be serious. You know he don't come out the house. He been around. This serious bro [U/I].

WG: Shit, we should've kept some shit for ourselves.

CP: I've been waiting for that boy, but he has not said anything.

WG: I had like a thousand calls already.

CP: (U/I) Yeah I hear, I'm telling you. All I need you to say is. U/I They gonna pay bro. Yo, imagine, four of my Vicks for fucking 1350 bro.

WG: Damn.

CP: Yeah, bro. Yo I was shocked. I was like what? Was like yeah. Then some dude right there. One of my peoples, yeah he said today, but uhh and then they gotta fuck with, you know what I mean the gordito?

WG: Yeah.

CP: He was telling me last night, he said, "Yo I'll probably be in tomorrow, I can hit you off. You know one of them jawns. I could hit you off but, you, you're gonna pay, about forty-six." I was like, man, fuck it bro. I blew spot. Yo, I was out fucking downtown last night till like nine o'clock bro. Oh my God. Oh my God, the blue jeans over there. Off the, that shit was done yesterday. Yesterday they did five too, bro. I mean yo, it was eight o'clock, I was out there like, what the fuck. Now I'm having, you know, like an emergency right now, like, emergency. [U/I] to the store to buy some eggs real quick, make a omelet and shit. Why he call me the car, to put the piece on, he about to get out in twenty more minutes. They're gonna take the car down the street to get it programmed, hopefully we can have this car be done today. This day, hopefully. But alright, [U/I] blue jeans right now for right now. I probably got a five piece. You got somebody for a five piece?

WG: I'll make some calls.

CP: Yeah but this shit is fire, bro.

WG: I'll make some calls

CP: I'm a try and leave it as you know uh, you know what I'm saying? Like a Fred Flintstone rock. Should I leave it like that or I can mix shit up.

WG: [U/I]

CP: Huh? Can't hear you.

WG: I said leave it like that, cause it'll make her come back even better.

CP: I know but. [U/I]

WG: [U/I]

CP: Huh?

WG: You got blue socks for me?

CP: [U/I] Gotta get on it. It'll be a minute. I'm waiting for her to bring another, another, another uh, you know.

WG: You sure you got the five pieces, if I call right now?

CP: Bro, I got it, but I'm about to do some quick umm pancake mix.

WG: Aight, well do that and get situated then just text me like yo, you know, something like that.

CP: Yeah [U/I] I got it, but

WG: Aight.

CP: Aight.

306. Investigators believe that in the above exchange, **CARLOS PEREZ** expressed concern to **WALDEMAR GARCIA** that there was an insufficient supply of drugs (“purples,” “blue socks,” and “Vicks”) to support the DTO’s drug-trafficking activities. Further, **CARLOS PEREZ** realized he should have retained some of the previous day’s product because it was selling quickly the previous evening.

307. While intercepted conversations primarily indicate that **WALDEMAR GARCIA** and **CARLOS PEREZ**’s drug transactions are gram-quantity crack cocaine transactions, there are some intercepted communications reflecting that **WALDEMAR GARCIA** sells a variety of types of drugs provided to him by **CARLOS PEREZ**. For example, in an intercepted communication on August 24, 2018 between **CARLOS PEREZ**, using Target Telephone 5, and **WALDEMAR GARCIA**, using (856) XXX-8502, the following conversation took place:

PS: Yeah?

WG: Um, I need that uh... that uh... that 10 situation.

PS: The little Danny....Danny Diablo?

WG: Yeah.

PS: You gonna have to wait on that one. Imma have to step out and see somebody.

WG: Fuck no. He’s on his way back down again.

PS: Then you gotta...you gotta tell people not to be on they way, you know? You gotta call first.

WG: Bro, you said...you said...hey wait, wait, wait, wait, wait, wait. You said you good on everything. You said that clearly.

PS: No, no, no, no, nah, besides that. If I was to....every...everything besides that. Let me, um, let me make a phone call.

WG: Alright.

PS: Alright.

308. I understand that in the above conversation, **CARLOS PEREZ** and **WALDEMAR GARCIA** had an argument because **CARLOS PEREZ** did not have a particular type of drug available for sale after **CARLOS PEREZ** already indicated to **WALDEMAR GARCIA** that he



had “everything.” **CARLOS PEREZ** later clarified that **CARLOS PEREZ** meant “everything besides that.”

309. Law enforcement intercepted another conversation on September 7, 2018 between **WALDEMAR GARCIA**, using 856-535-8502, and **CARLOS PEREZ**, using Target Telephone 5. In this conversation, the two men discussed **WALDEMAR GARCIA**’s interest in obtaining heroin (“blue jeans”), crack cocaine (“Fred Flintstone” and “hard”), cocaine (“soft”), and another unidentified drug (“the other situation”). Here is a transcript of the conversation:

CP: What happened?  
WG: You lost me right there.  
CP: What we talked about?  
WG: Uhh oh the blue... Yeah the blue jeans.  
CP: Yeah.  
WG: Yeah, but you said fried uh uh...  
CP: Fred Flintstone. Fred Flintstone.  
WG: Oh.  
CP: The way you wanted it.  
WG: Aight.  
CP: Not soft.  
WG: Okay. Making a call now.  
CP: Lemme know...lemme know if none of that shit is going to go.  
WG: No no...I'mma...Relax.  
CP: I got ten. I got ten soft and hard.  
WG: Alright and how about the other situation?  
CP: Nah no.  
WG: Call you in a couple of minutes.

310. These and other intercepted communications between **CARLOS PEREZ** and **WALDEMAR GARCIA**, combined with various surveillance observations, reflect that **CARLOS PEREZ** and **WALDEMAR GARCIA** have trafficked in large amounts of crack cocaine (“fried” “Fred Flintstone” as well as other drugs).

#### **NAEEM SADLER**

311. **Summary.** **NAEEM SADLER** is a set worker in the DTO. Law enforcement

officers have observed **NAEEM SADLER** through video surveillance on several occasions, including during November 2018, while **NAEEM SADLER** was engaging in what law enforcement recognized, based on training and experience, to be hand-to-hand drug transactions on the 400-500 blocks of Pine Street.<sup>51</sup>

312. **Criminal History.** **NAEEM SADLER**'s adult criminal history includes: (1) a March 15, 2018 arrest that resulted in a felony conviction for possession of Controlled Dangerous Substances; and (2) a March 22, 2018 arrest that resulted in a felony conviction for contempt of court and violation of a judicial order. The court order in question prohibited **NAEEM SADLER** from being present in the area of the 400-500 blocks of Pine Street, which is the same area involved in the current investigation.

313. **Identification.** **NAEEM SADLER** was identified as a member of the DTO through video surveillance as well as physical surveillance of **NAEEM SADLER**'s actions on various dates including March 15, 2018. On that date, at the direction of law enforcement, a CHS visited the 400-500 blocks of Pine Street with the intention of purchasing a quantity of drugs from JOSE DIAZ. When the CHS arrived on the 400-500 blocks of Pine Street, the CHS did not see JOSE DIAZ, but saw **NAEEM SADLER** and others. The CHS interacted with **NAEEM SADLER**, during which time **NAEEM SADLER** asked the CHS to see if the CHS could find powder cocaine customers for **NAEEM SADLER**. Shortly thereafter, the CHS left the area, without having

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<sup>51</sup> For example, video surveillance shows Naeem Sadler on the 400-500 blocks of Pine Street engaging in hand-to-hand drug transactions, looking out for others who are engaging in hand-to-hand drug transactions, or meeting with other DTO members, on the following dates and times: June 28, 2018 at approximately 11:33 a.m.; June 25, 2018 at approximately 12:18 p.m.; July 25, 2018 at approximately 11:54 a.m.; September 1, 2018 at approximately 1:34 p.m.; September 25, 2018 at approximately 11:47 a.m.; and October 5, 2018 at approximately 2:55 p.m.

purchased drugs from **JOSE DIAZ**.

314. A short while later on that same date, **NAEEM SADLER** was arrested by local law enforcement near the intersection of 5<sup>th</sup> and Pine Streets, along with other individuals including **DWIGHT WILLIAMS**, after **NAEEM SADLER** was found in a parked car that contained individually-packaged substances that tested positive for cocaine, as well as a substance that law enforcement believes to be marijuana, based on smell and physical appearance.<sup>52</sup> Notably, some of the cocaine found in the parked car was recovered from the groin area of **NAEEM SADLER**. **NAEEM SADLER** was charged with Distribution of Cocaine and Possession of Cocaine.

315. Over the course of the investigation, **NAEEM SADLER** has been intercepted over Target Telephone 1 engaging in conversations believed to be involving the trafficking of illegal narcotics. For example, based on various intercepted communications, law enforcement learned that on June 25, 2018, **JOSE DIAZ** provided **NAEEM SADLER** with the number for Target Telephone 1, and gave **NAEEM SADLER** de-facto authority to act as a shift manager while **JOSE DIAZ** was unavailable in court dealing with a pending legal matter. Throughout the course of the day, **NAEEM SADLER** engaged with various street-level drug traffickers over Target Telephone 1, including **WILLIAM CARRILLO**, as well as runner/manager **JUAN FIGUEROA**, to ensure that drug-trafficking operations continued on the 400-500 blocks of Pine Street in **JOSE DIAZ**'s absence.

316. For example, in an intercepted conversation in which **NAEEM SADLER** operated Target Telephone 1, **NAEEM SADLER** communicated with **JUAN FIGUEROA** regarding when

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<sup>52</sup> Following the arrests, **DWIGHT WILLIAMS** was charged with Possession of Marijuana under 50 grams and released.

At the driver's request, the key to the parked car was turned over to **JOSE DIAZ**.

the 400-500 blocks of Pine Street workers may need additional drugs for redistribution:

NS: Hello.  
JF: Yo.  
NS: Yo.  
JF: You good?  
NS: Yeah.  
JF: Who the fuck is this?  
NS: Naeem.  
JF: This bitch ass, [U/I] guys feel?  
NS: Nah, cause he had to go to court.  
JF: Oh, so is like I'm dealing with you?  
NS: Nah, you still dealing with him he's back.  
JF: Yah I'm saying if he not back... I'm saying though like, like, everybody good?  
You don't need nothing?  
NS: Yah I don't...I don't know...I don't really...I'm ready to check right now and ask him.  
JF: Alright.  
NS: I'm going to call you right back.  
JF: Alright.

317. Video surveillance reflects that shortly after the conversation above, **NAEEM SADLER** was present on the 400-500 blocks of Pine Street, as he had indicated he would be. This video surveillance corroborates my understanding of the above conversation. Specifically, I understand that when **NAEEM SADLER** stated, "I'm ready to check right now and ask him," he meant that he was going to go to the 400-500 blocks of Pine Street and make sure that the set workers ("everybody") was "good," and that the DTO's drug-trafficking activities were going well.

318. This same day, a CHS communicated with **NAEEM SADLER** over Target Telephone 1 regarding the CHS's interest in purchasing "grams" of heroin ("the D's"). Here is a transcript of the conversation:

CHS: Yo.  
NS: Yo.  
CHS: Yo, I said call me when you get done in there, bro.

NS: Ohhh...why you need somethin'?

CHS: Yeah, 'member what we talked about?

NS: What?

CHS: The G's.

NS: Ohhhh....the D's?

CHS: The grams.

NS: Oh. Aiight imma call you as soon as I'm done.

CHS: Aiight, 'cause last... 'cause you didn't even call me back the other day when I asked you about it.

NS: Aiight imma make sure you get it.

CHS: Aiight.

319. Video surveillance reflects that during or around the time of this call, NAEEM SADLER was present on the 400-500 blocks of Pine Street.

320. Through these and other conversations about drug-trafficking activities, along with video surveillance of NAEEM SADLER's hand-to-hand transactions, NAEEM SADLER was confirmed to be a set worker for the DTO.

#### **JAMEEL BYNG**

321. **Summary.** JAMEEL BYNG is a set worker for the DTO. Over the last several weeks, law enforcement has observed JAMEEL BYNG through video surveillance, engaging in what law enforcement recognized, based on training and experience, to be hand-to-hand drug transactions including as recently as November 16, 2018. In addition, JAMEEL BYNG sold drugs directly to a CHS in the context of a controlled purchase transaction, as set forth below.

322. **Criminal History.** JAMEEL BYNG's adult criminal history includes: (1) a December 7, 2012 arrest that resulted in a felony conviction for Harassment while Imprisoned by Monroe Township Police Department; (2) a April 27, 2016 arrest that resulted in a felony conviction for Manufacture/Distribution/Possession with intent to Distribute Heroin by the Camden County Police Department; and (3) a July 7, 2016 arrest that resulted in a felony

conviction for Distribution of a Controlled Drug Substance by the Camden County Police Department. **JAMEEL BYNG** also has other pending drug related charges arising from an arrest on August 8, 2018 from the Camden County Police Department. Specifically, the pending charges are as follows: possession of CDS/analog, Schedule I, II, III; and manufacture, distribution, and possession with intent to distribute heroin and CDS/analog on or near a protected area.

323. **Identification.** **JAMEEL BYNG** has been observed on video surveillance engaging in hand-to-hand drug transactions on the 400-500 blocks of Pine Street, consistent with his role as a DTO set worker. In addition, **JAMEEL BYNG** was identified as a member of the DTO through his participation in direct drug sales to CHSs, as described below.

324. **Selected evidence.** On or about October 23, 2018, law enforcement conducted a controlled drug purchase with **JAMEEL BYNG** using a CHS. During the operation, CHS engaged in a consensually recorded conversation with **JAMEEL BYNG** regarding the purchase of heroin and cocaine. Following the initial meeting, during which the CHS expressed that he would like to buy drugs, **JAMEEL BYNG** was observed as he visited a known residence on Pine Street in Camden, which law enforcement believes is a stash house, and for which law enforcement already has obtained a search warrant. Law enforcement believes that **JAMEEL BYNG** visited this location for the purpose of obtaining narcotics.

325. **JAMEEL BYNG** was then observed as he exited the residence referenced above and entered the CHS's vehicle, where he provided the CHS with a sum of heroin and powder cocaine. Following the controlled drug transaction with CHS, law enforcement observed **JAMEEL BYNG** as he continued to engage in street-level drug sales with unknown individuals located on the 400-500 blocks of Pine Street in Camden.

326. On or about November 13, 2018, law enforcement conducted a controlled drug purchase from **WILLIAM CARRILLO**, who ultimately sold drugs to the CHS at the direction of **JAMEEL BYNG**. First, the CHS engaged in a consensually-recorded conversation with **JAMEEL BYNG** regarding the purchase of heroin. **JAMEEL BYNG** then directed **WILLIAM CARRILLO** to conduct a drug transaction with the CHS. Ultimately, **WILLIAM CARRILLO** sold a quantity of heroin to the CHS near the 400-500 blocks of Pine Street, which the CHS then turned over to law enforcement.

327. In addition, **JAMEEL BYNG** has been observed via video surveillance on November 10, 11, 12 and 13th meeting with other DTO members and while engaging in hand to hand drug transactions with unknown individuals. While being located along the 400-500 blocks of Pine Street, **JAMEEL BYNG** was observed via video surveillance as he frequented various vehicles and entered/exited the suspected stash location on Pine Street, referenced above, which law enforcement believes **JAMEEL BYNG** did for the purpose of concealing proceeds obtained from narcotics transactions or to secure additional drugs.

#### V. SEALING

328. Because this application and Affidavit pertain to an ongoing criminal investigation, and because disclosure of the information contained herein as well a disclosure of the complaints and warrants being requested may compromise the investigation and increase the risk of harm for law enforcement officers who are responsible for conducting the searches, I request that this Affidavit, the criminal complaints, the arrest warrants, and all related documents be filed under seal until further order of the Court, except for a copy of the arrest warrants to be served at the time of execution.

## **VI. CONCLUSION**

329. Wherefore, I submit that there is probable cause to believe that the members of the conspiracy described above, from in or about November 2016 to November 2018, in Camden County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and possess with intent to distribute at least 280 grams of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine (“powder cocaine”), a Schedule II controlled substance; at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and in violation of Title 21, United States Code, Section 846.

330. The information contained in this Affidavit is known to be true and correct to the best of my knowledge, information and belief.