
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
: :
v. : :
: :
LAMONT VAGUHN : Magistrate No. 13-
a/k/a "Mont," :
a/k/a "True V," :
JAREZ BARON :
a/k/a "Little Bro" :
a/k/a "Double," :
THERESA BARRON :
a/k/a "Ree," :
LATOYIA VAUGHN :
a/k/a "Toya", :

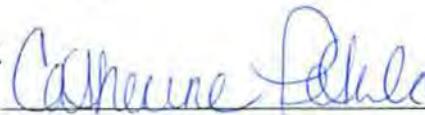
I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

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

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Catherine Petula
Special Agent, FBI

Sworn to before me and subscribed in my presence,

August 7, 2013
Date

Newark, New Jersey
City and State

HONORABLE CATHY WALDOR
United States Magistrate Judge


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

From on or about August 1, 2012 through on or about August 5, 2013, in Essex County, in the District of New Jersey and elsewhere, defendants LAMONT VAGUHN, a/k/a "Mont," a/k/a "True V;" JAREZ BARON, a/k/a "Little Bro," a/k/a "Double;" THERESA BARRON, a/k/a "Ree;" and LATOYIA VAUGHN, a/k/a "Toya" did knowingly and intentionally conspire and agree with each other and with others to distribute and possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841 (b)(1)(B).

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

COUNT TWO

From on or about August 1, 2012 through on or about August 5, 2013, in Essex County, in the District of New Jersey and elsewhere, defendants LAMONT VAGUHN, a/k/a "Mont," a/k/a "True V;" JAREZ BARON, a/k/a "Little Bro," a/k/a "Double;" THERESA BARRON, a/k/a "Ree;" and LATOYIA VAUGHN, a/k/a "Toya" did knowingly and intentionally conspire and agree with each other and with others to distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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

ATTACHMENT B

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

1. From on or about August 1, 2012 through August 5, 2013, LAMONT VAGUHN a/k/a "Mont," a/k/a "True V" ("VAUGHN"); JAREZ BARON, a/k/a "Little Bro," a/k/a "Double" ("LITTLE BRO"); THERESA BARRON a/k/a "Ree" ("THERESA BARON"); and LATOYIA VAUGHN a/k/a "Toya" ("TOYA") (collectively, "the Defendants") worked in conjunction with each other and other co-conspirators not charged herein to distribute heroin and prescription pills, to include oxycodone, in Newark, New Jersey, including out of a retail store in Newark, New Jersey ("the Retail Store").

2. During this time period, a confidential source ("CS-1") met with one or more of the Defendants on more than 30 occasions. On each of these occasions, one of the Defendants sold CS-1 heroin and/or oxycodone pills. The majority of these sales were consensually audio and video recorded and include but are not limited to the following:

- a. On or about October 18, 2012, VAUGHN met with CS-1 at the Retail Store. During the ensuing meeting, Vaughn handed CS-1 two bricks¹ of heroin in exchange for \$690. Laboratory test results of the substance in the bricks indicate the presence of heroin.
- b. On or about October 26, 2012, VAUGHN met with CS-1 at the Retail Store. During the meeting, VAUGHN directed CS-1 to the back of the store, so that CS-1 would not be visible from the street. VAUGHN then handed CS-1 four bricks of heroin in exchange for \$1,000. Laboratory test results of the substance in the bricks indicate the presence of heroin. Following the transaction, CS-1 asked VAUGHN whether CS-1 could purchase larger amounts of drugs less frequently. VAUGHN told CS-1 that would not be a problem.
- c. On or about December 13, 2012, VAUGN met CS-1 at the Retail Store. When CS-1 arrived, VAUGHN told CS-1 that the heroin would be delivered to the Retail Store within the hour. While CS-1 waited inside the Retail Store, CS-1

¹ Heroin is commonly sold on the street in small glassine envelopes containing approximately 20 milligrams of heroin in each glassine. One glassine is often referred to as a "deck" of heroin. The glassines are commonly pre-packaged into bundles of 10 "decks" or 10 glassines. A "brick" of heroin is five "bundles" or 50 decks and contains approximately 1 gram of heroin

observed numerous individuals enter the Retail Store and purchase various prescription drugs, to include oxycodone. Later that day, and prior to CS-1 leaving the Retail Store, Vaughn handed CS-1 ten pre-packaged bricks of heroin in exchange for \$2,230. Laboratory test results of the substance in the bricks indicate the presence of heroin.

- d. On or about January 17, 2013, VAUGHN met CS-1 at the Retail Store. Once they were both inside the store, VAUGHN handed CS-1 ten pre-packaged bricks of heroin in exchange for \$2,300. Laboratory test results of the substance in the bricks indicate the presence of heroin. After the heroin transaction, CS-1 asked VAUGHN for \$200 worth of "blues" and "bananas." VAUGHN stated he had the pills and thereafter handed CS-1 twelve yellow pills of Endocet (which based on my training and experience are what CS-1 requested when he asked for bananas) and five blue pills of Oxycodone (which based on my training and experience are what CS-1 requested when he asked blues) in exchange for two hundred dollars \$200. Laboratory test results on the pills indicate the presence of oxycodone.
- e. On or about February 13, 2013, VAUGHN met CS-1 at the Retail Store. Once they were both in the Retail Store, Vaughn handed CS-1 eleven pre-packaged bricks of heroin and two bundles of heroin in exchange for \$2,350. Laboratory test results of the substance in the bricks and bundles indicate the presence of heroin.
- f. On or about March 1, 2013, VAUGHN met CS-1 at the Retail Store. Once inside the Retail Store, Vaughn handed CS-1 ten pre-packaged bricks of heroin in exchange for \$2,360. Laboratory test results of the substance in the bricks indicate the presence of heroin.
- g. On or about March 29, 2013, VAUGHN met CS-1 at the Retail Store. Once, they were both inside the Retail Store, VAUGHN gave CS-1 ten pre-packaged bricks of heroin in exchange for \$2,350. Laboratory test results of the substance in the bricks indicate the presence of heroin.
- h. On or about May 28, 2013, VAUGHN met CS-1 at the Retail Store. When CS-1 arrived at the Retail Store, VAUGHN told CS-1 that someone was delivering the heroin CS-1 had requested to the Retail Store. Shortly thereafter, an individual in the Retail Store, who was looking outside the front window of the store, told VAUGHN, "He's here." CS-1 understood that to mean that the person delivering the heroin had arrived. VAUGHN then directed the individual to go outside and get the drugs. The individual left, returned moments later, and, in front of CS-1,

handed VAUGHN the heroin. VAUGHN then handed CS-1 five pre-packaged bricks of heroin in exchange for \$1,175. Laboratory test results of the substance in the bricks indicate the presence of heroin.

- i. On June 28, 2013, CS-1 went to the Retail Store in order to purchase narcotics. When CS-1 arrived at the Retail Store, LITTLE BRO and TOYA were in the Retail Store. VAUGHN arrived shortly thereafter. CS-1 told law enforcement that following his arrival, VAUGHN provided CS-1 with four bricks of heroin. CS-1 further told law enforcement that: (a) LITTLE BRO took an additional 21 decks of heroin from on top of the ceiling fan in the Retail Store; (b) LITTLE BRO handed the decks of heroin to VAUGHN; and (c) VAUGHN handed the decks of heroin to CS-1. In exchange for the heroin, CS-1 gave VAUGHN \$1,100. CS-1 told law enforcement that the drug purchase was done in front of TOYA and that CS-1 believes TOYA was also able to overhear the related conversation regarding the price and quantity of drugs. Laboratory test results of the substance in the bricks indicate the presence of heroin.
 - j. On or about July 18, 2013, CS-1 called VAUGHN in order to set up a heroin deal for later that day. VAUGHN told CS-1 to meet him at the Retail Store. When CS-1 arrived at the Retail Store, CS-1 was met by LITTLE BRO. While CS-1 was inside the Retail Store, VAUGHN called LITTLE BRO and spoke with LITTLE BRO over the telephone about the price of the heroin CS-1 wanted to buy. After the telephone conversation concluded, LITTLE BRO gave CS-1 5 pre-packaged bricks of heroin in exchange for \$1,175. Laboratory test results of the substance in the bricks indicate the presence of heroin. In addition to CS-1's request to purchase heroin, CS-1 asked LITTLE BRO for "bananas." In response, LITTLE BRO handed CS-1 8 yellow pills of Endocet (Endocet is a prescription pill that contains oxycodone. It is yellow in color and it what CS-1 requested when he asked for bananas) in exchange for \$80.
3. In addition to the controlled purchases described above, law enforcement intercepted conversations of the Defendants pursuant to Court Orders. The intercepted conversations include but are not limited to the following:
- a. On June 13, 2013, VAUGHN received an incoming call. An unidentified male asked VAUGHN, "Yo, I need a brick. You got it?" VAUGHN responded, "Yeah, I got it." The male then told VAUGHN, "Alright. I'll be there in five minutes. You at the store?" VAUGHN stated, "Yeah." Based upon my training and experience, and the investigation to date, I believe the unidentified male was asking to purchase a brick of heroin from VAUGHN.

- b. On June 13, 2013, VAUGHN received a call from an individual who asked VAUGHN, "You need, you need any yellows?" VAUGHN stated, "Yeah." The person told VAUGHN, "I got 120." VAUGHN replied, "They're five dollars right?" The person said the pills were five dollars each and told VAUGHN, "Alright, I'll be around there okay? You gonna be in the store?" VAUGHN replied, "Yeah." Based upon my training and experience, and the investigation to date, I believe the individual offered and then agreed to sell 120 pills of Endocet to VAUGHN for five dollars each.
- c. On June 15, 2013, VAUGHN called LITTLE BRO. During the ensuing conversation, VAUGHN told LITTLE BRO that, "My man about to come down there and get a banana. Give it to him. He... I got him." LITTLE BRO asked, "What he look like?" VAUGHN TOLD him, "He short. He got on a white tank top. ... You gonna know who he is when he come up." LITTLE BRO replied, "Alright. Just toss it to him, right?" VAUGHN stated, "Yeah. I was just outside talking to him." LITTLE BRO then asked, "He want the nanna or white one?" VAUGHN replied, "The nanna." Based upon my training and experience, and the investigation to date, I believe that VAUGHN was telling his co-conspirator LITTLE BRO to sell Endocet to a customer VAUGHN sent to the Retail Store.
- d. Earlier that day, LITTLE BRO called VAUGHN and told him that a drug supplier was in the store and wanted to speak with VAUGHN. VAUGHN told LITTLE BRO that he would come to the Retail Store.
- e. On June 16, 2013, VAUGHN had approximately three telephone calls with THERESA BARRON. During the telephone calls, VAUGHN told THERESA BARRON that he needed more drugs at the Retail Store and instructed THERESA BARRON as to where the drugs could be found in a certain residence. For example, in one call VAUGHN told THERESA BARRON, "I need another brick." THERESA BARRON replied, "Alright." In another telephone call, VAUGHN told THERESA BARRON that, "I need one, I need one of my pills, pill." THERESA BARRON again replied, "Alright." In another call, THERESA BARRON asked VAUGHN, "Where's, Where's your ummm.... Where's your ummm... whatchamacallit pills?" VAUGHN replied that they were either on top of or next to the refrigerator.
- f. On June 28, 2013, VAUGHN left the Retail Store and placed a call to TOYA. During ensuing conversation, VAUGHN told TOYA to "be on point" and act as a look-out for police officers. VAUGHN further told TOYA that he believed there

were undercover police offices in and around the Retail Store and that he wanted TOYA to look out for them. Following the call, law enforcement surveillance observed TOYA monitoring the door of the Retail Store and looking up and down the street. Based upon my training and experience, TOYA was acting as a “look out” for VAUGHN, which is a common technique employed by narcotics trafficker to protect their narcotics and to thwart law enforcement.

- g. A short time later, VAUGHN spoke with TOYA and told her that a drug customer was traveling to the Retail Store. VAUGHN also told TOYA to make sure she collected all the money that the drug customer owed them. TOYA replied, “I know. I’m already on that.” VAUGHN then confirmed the amount owed, and TOYA replied, “I know. I gotch you.”
- h. On July 1, 2013, VAUGHN called TOYA while TOYA was inside Ballas Boutique. Based upon the investigation and the intercepted calls during that time period, I believe TOYA was selling drugs out of the Retail Store. During the ensuing conversation, VAUGHN told TOYA to be careful when she opened the front door of the Retail Store to let customers inside because VAUGHN believed there were police officers close to the Retail Store. TOYA told VAUGHN that she understood and that she saw “the black crown vic” in the area.
- i. On July 5, 2013, LITTLE BRO called VAUGHN and asked “You on the way down yet?” VAUGHN replied, “Yes, sir. I’m picking up some blues from my man and I’m on my way.” Based upon my training and experience, and the investigation to date, VAUGHN told LITTLE BRO that he was getting Oxycodone from one of his prescription pill suppliers and would then be going to the Retail Store.
- j. On July 5, 2013, VAUGHN called LITTLE BRO and asked “What happened?” LITTLE BRO replied, “She got 90 of them blue things.” VAUGHN then told LITTLE BRO to, “Tell her I am on my way.” Based upon my training and experience, and the investigation to date, LITTLE BRO was telling VAUGHN that one of their pill suppliers was at the Retail Store and that she had 90 Oxycodone pills to sell to them.
- k. On July 9, 2013, VAUGHN called TOYA who was at the Retail Store. Based upon the investigation to date, including the intercepted calls during that time period, I believe that at and around the time of the call, TOYA was selling drugs out of the Retail Store. During the ensuing conversation, VAUGHN told TOYA that she needed to sell the “green” pills for \$12 each. TOYA replied that she

agreed. During the call, TOYA can be heard telling a customer that VAUGHN said the greens are \$12 each.

- l. On July 15, 2103, LITTLE BRO called VAUGHN. During the call VAUGHN asserted that he was upset with LITTLE BRO because VAUGHN believed Little Bro closed the Retail Store early even though there were drug customers at the Retail Store when it closed. VAUGHN asked LITTLE BRO what he did with the drugs and the money when he closed the store. LITTLE BRO told VAUGHN that THERESA BARRON took everything and was bringing it to VAUGHN's apartment
- m. On July 20, 2013, LITTLE BRO spoke with a narcotics customer and told the customer to come to Retail Store, where LITTLE BRO was located, to buy drugs.
- n. On July 22, 2013, THERESA BARRON called VAUGHN. Based upon my training and experience, and the investigation to date, including this conversation and conversations intercepted prior to and after this conversation, I believe THERESA BARRON was located at VAUGHN's apartment during the conversation. During the conversation, VAUGHN asked THERESA BARRON to look inside a bag containing drugs or "pieces" that he sent to the apartment earlier that day. In response, THERESA BARRON referred to the drugs as "candy." VAUGHN then told THERESA BARRON that he was sending a drug customer to the apartment to buy drugs, that there were additional drugs "on top of the closet," and that she should sell both what was in the bag and on top of the closet to the customer. VAUGHN additionally explained that he wanted to know the quantity of drugs so he could let THERESA BARRON know how much money she should take from the buyer when he came to the apartment to buy the drugs.
- o. Later that day, VAUGHN spoke with LITTLE BRO and an unidentified male. During the conversation, LITTLE BRO said they were at the Retail Store and that they sold all the drugs they had at the store. Specifically, the following conversation took place:

UM: Yeah, I'm here with Double here, he [UI]

VAUGHN: Where you at? The store?

UM: Yeah. Everything, everything is gone, man. Cash, ready to cash out baby.

VAUGHN: Put him on the phone.

UM: Hold on.

LITTLE BRO: Yo.
VAUGHN: Everything gone?
LITTLE BRO: Everything must go.
VAUGHN: Everything?
LITTLE BRO: Except the juice, man. They must of got their juice
up the hill or something, man.
VAUGHN: [UI] Ah, that's a kick-[expletive] day.
LITTLE BRO: This day was amazing. And it's so amazing,
tomorrow's gonna be amazing.
VAUGHN: Heh, tomorrow gonna be amazing. Alright, I'm
gonna be there in a couple minutes, yo

- p. On August 2, 2103, VAUGHN placed a call to THERESA BARRON. During the ensuing conversation, VAUGHN asked her if LITTLE BRO had left the apartment. THERESA BARRON told VAUGHN that LITTLE BRO left. In response, VAUGHN told THERESA BARRON that he need her to bring drugs from the apartment to him at the Retail Store. In response, THERESA BARRON agreed to bring VAUGHN the drugs.
4. Between on or about August 1, 2012, and on or about August 1, 2013, the Defendants and others sold CS-1 a total of approximately 180 grams of a mixture and substance containing heroin and approximately 15 grams of a mixture or substance containing oxycodone.