

UNITED STATES DISTRICT COURT

for the District of New Jersey

ORIGINAL FILED
OCT 14 2014
WILLIAM T. WALSH, CLERK

United States of America
v.
WENDELL BETHEA,
a.k.a. "RELL," a.k.a. "RUGER"

Case No. 14-mj-5552 (KMW)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August through October 2014 in the county of Camden in the District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. Section 846	Conspiracy to distribute and possess with intent to distribute, and distribution and possession with intent to distribute, 100 grams or more of a mixture and substance containing a detectable amount of heroin, and 50 grams or more of methamphetamine, also known as "Ice" and
21 U.S.C. Sections 841(a) and 841(b)(1)(A) and (B)	
18 U.S.C. Section 922(g)(1)	Possession of a firearm by a previously convicted felon
18 U.S.C. Section 2	For further description see Attachment A

This criminal complaint is based on these facts:

See Attachment B, Affidavit

Continued on the attached sheet.

Jacob B. Archer
Complainant's signature
Jacob B. Archer, Special Agent FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/14/2014

Karen M. Williams
Judge's signature
Hon. Karen M. Williams, U.S. Magistrate Judge
Printed name and title

City and state: Camden, New Jersey



ATTACHMENT A

COUNT ONE

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

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

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

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

COUNT TWO

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

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

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

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

COUNT THREE

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

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

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

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

COUNT FOUR

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

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

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

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

COUNT FIVE

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

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

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

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

COUNT SIX

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

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

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

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

COUNT SEVEN

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

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

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

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

COUNT EIGHT

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

WENDELL FLEETWOOD, a/k/a "Dell," and
WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger,"

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

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

COUNT NINE

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

WENDELL FLEETWOOD, a/k/a "Dell," and
WENDELL BETHEA, a/k/a "Rell," a/k/a "Ruger,"

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

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

COUNT TEN

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

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

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

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