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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 15-3518  
 :  
v. : Hon. Mark Falk  
 :  
CLARENCE WEBB, : **CRIMINAL COMPLAINT**  
 a/k/a "Farod," :  
DANIEL NEWSOM, :  
 a/k/a "Spree," :  
DAVID MILLER, :  
 a/k/a "Big D," :  
 a/k/a "Dido," :  
BRUCE WILLIAMS, :  
 a/k/a "B," :  
 a/k/a "Bud," :  
JUAN PERALTA, :  
 a/k/a "Juan Rodriguez," :  
 a/k/a "Papa," :  
 a/k/a "Papi," :  
ANTHONY McBRIDE, :  
 a/k/a "Michael McBride," :  
 a/k/a "Mac," :  
TAMIR STYLES, :  
 a/k/a "T," and :  
MYISHA WILSON :

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

SEE ATTACHMENT A

I further state that I am a Special Agent with the Drug Enforcement Agency, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



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Steven E. Carroll, Special Agent  
Drug Enforcement Agency

Sworn to before me and subscribed in my presence,  
on March 10, 2015, at Newark, New Jersey



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HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

## **ATTACHMENT A**

From in or about October 2014 through in or about March 10, 2015, in Essex, Middlesex, and Somerset Counties, in the District of New Jersey, and elsewhere, the defendants,

CLARENCE WEBB,  
a/k/a "Farod,"  
DANIEL NEWSOM,  
a/k/a "Spree,"  
DAVID MILLER,  
a/k/a "Big D," a/k/a "Dido,"  
BRUCE WILLIAMS,  
a/k/a "B," a/k/a "Bud,"  
JUAN PERALTA,  
a/k/a "Juan Rodriguez," a/k/a "Papa," a/k/a "Papi,"  
TAMIR STYLES,  
a/k/a "T,"  
ANTHONY McBRIDE,  
a/k/a "Michael McBride," a/k/a "Mac," and  
MYISHA WILSON,

did knowingly and intentionally conspire with each other and 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.

## **ATTACHMENT B**

I, Steven E. Carroll, am a Special Agent with the Drug Enforcement Agency, and I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge and on information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information relating to the defendants; (c) my review of business records, other documents, and evidence obtained through court orders, subpoenas, and other sources; and (d) my review of audio and video recordings, photographs, and court-authorized wiretaps. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where I assert that an event took place on a particular date or a particular time, I am asserting that it took place on or about the date or time alleged. Where the content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part, and the content of statements and meetings are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared by monitors and, in some cases, draft verbatim transcripts of the conversations prepared by monitors and other personnel. Statements that appear [*in brackets and italicized*] reflect my reasonable belief about the meaning of a speaker's particular statement, based on my knowledge, training, and experience, as well as conversations with confidential informants and law enforcement officers familiar with drug slang and other aspects of this investigation. The following abbreviations are used in quoted statements: “[U/I]” for unintelligible; “[PH]” for phonetic; “[OV]” for overlapping voices.

1. From at least as early as in or about October 2014 through in or about March 2015, the defendants operated and participated in a drug trafficking organization, identified here as the “Parkside DTO.” Among other things, members of the Parkside DTO obtained bulk quantities of heroin in Essex County, New Jersey, and supplied it to various dealers, sub-dealers, and end users in Middlesex and Somerset Counties, especially in the “Parkside” neighborhood that straddles the municipalities of New Brunswick and Franklin Township, New Jersey.

2. Between in or about October 2014 and February 2015, the United States District Court, District of New Jersey, entered orders authorizing the

interception of communications that occurred over multiple cell phones used by members of the Parkside DTO. Based upon these intercepted communications, as well as physical surveillance, controlled heroin purchases, information from confidential sources, and other investigative techniques, law enforcement officers uncovered the operational structure and inner workings of the Parkside DTO and the manner and means by which it carried out the heroin trafficking conspiracy. Among other things, the Parkside DTO and its suppliers:

- a. Facilitated the transportation of heroin, typically in “raw” (or unpackaged) form, from Essex County to Middlesex and Somerset Counties;
- b. Used various “stash houses” and other temporary locations to package, store, and distribute heroin;
- c. Took steps to avoid detection by law enforcement, including by speaking in code to disguise the illicit nature of their discussion and, in some cases, using prepaid cellular phones with fictitious or no subscriber information for a short period of time and then “dropping” or replacing those devices with other telephones; and
- d. Enriched members and associates of the Bounty Hunter Bloods (“BHB”), a street gang operating in and around Middlesex and Somerset counties.

3. Based on my knowledge, training, and experience, I am familiar with a wide range of criminal activity relating to the trafficking, processing, packaging, and distribution of heroin and other controlled substances in the District of New Jersey and elsewhere. Among other things, I know that:

- a. Heroin can be processed and sold in various forms, including as a powder (typically white in color, although sometimes off-white, grey, or brown, depending on the additives used to dilute the drug, and colloquially known as “white powder” heroin) or as a thicker, more viscous substance (typically black or dark brown, and colloquially known as “black tar” heroin). Generally speaking, in northern and central New Jersey (i.e., the area where the Parkside DTO operates), white powder heroin is more widely available – and more popular among street-level distributors and end-users – than black tar heroin. Similarly, it is generally believed by distributors and end-users that the “whiter” the white powder, the higher quality the product.

b. White powder heroin is typically produced outside the United States and then smuggled into the country in bulk. Higher-level dealers distribute the heroin in unpackaged (or “raw”) form, which is then diluted (or “cut”) with additives and packaged for street-level distribution (sometimes called “bagging up”).

c. In street-level transactions, white powder heroin is often packaged and sold as a “brick.” A brick is street terminology for a package of heroin containing 50 bags or sealed glassine envelopes, each one containing an individual dose (or “dec”) of heroin. Although the total amount of heroin in a brick varies from case to case, a brick typically contains approximately one gram of heroin.

d. Heroin dealers normally use an ink stamp to mark all of the glassine envelopes they sell with a distinctive image, word, or other design (known as a heroin “stamp”), and these stamps are used by dealers and users alike to distinguish heroin by quality and source.

e. As with any drug, as heroin moves through distribution channels from high-level suppliers to mid-level street dealers to end-users, the buyer and seller must agree on the payment method for the transaction. In some cases, the seller will provide the heroin on consignment (sometimes called “fronting”), which allows the buyer to delay payment until he or she has re-sold the drugs and collected money. In other cases, the seller will demand that the buyer pay upfront, which then exposes the buyer to greater financial risk if he or she is unable to resell the drugs as expected. The choice of payment method is typically determined by a variety of factors, including the level of trust between the buyer and seller.

4. At all times relevant to this Criminal Complaint:

a. Clarence Webb, also known as “Farod” (“Webb”), resided in Newark, New Jersey, and supplied heroin to members of the Parkside DTO, including defendants Daniel Newsom and David Miller. Webb typically obtained heroin in “raw” form and sold it to Parkside DTO members as such. In some cases, Webb drove from Newark to Parkside to deliver the heroin; in other cases, Newsom, Miller, and others traveled to Newark to pick up the drugs from Webb. Among Webb’s sources of heroin supply were defendants Bruce Williams and Juan Peralta. Webb used his residence in Newark (the

“Webb residence”) to meet co-conspirators before, during, and after drug transactions. Webb drove a 2011 BMW 535 series (the “Webb BMW”), registered in the name of defendant Myisha Wilson, and he used the Webb BMW to acquire and deliver drugs to co-conspirators. Webb worked at a barbershop (the “Webb barbershop”) on Springfield Avenue in Newark, where he met with co-conspirators to facilitate heroin transactions. Webb communicated with co-conspirators using a cellular phone, which was assigned a telephone number ending in 9675 (“Webb 9675 Phone”).

b. Daniel Newsom, also known as “Spree” (“Newsom”), resided in Franklin Township, New Jersey, and oversaw the distribution of heroin within the Parkside DTO. Newsom obtained “raw” heroin from Webb and then, with the assistance of other Parkside DTO members, packaged the heroin for street-level distribution (including by “bagging” glassine envelopes, marking them with ink stamps, and assembling them into bricks). Once packaged, Newsom sold bricks of heroin in Middlesex and Somerset counties, and many of his sales occurred on and around Hamilton Street in Franklin Township, a short distance from Newsom’s residence. Multiple confidential sources have identified Newsom as a leader of the BHB gang operating in the Parkside neighborhood. Newsom used his residence in Franklin Township (the “Newsom residence”) to meet co-conspirators before, during, and after drug transactions. Newsom drove a 1999 Acura 3.2 TL (the “Newsom Acura”), registered in the name of a family member, and he used the Newsom Acura to acquire drugs from and for co-conspirators. Newsom communicated with co-conspirators using at least two cellular phones, which were assigned telephone numbers ending in 1626 (“Newsom 1626 Phone”) and 7697 (“Newsom 7697 Phone”).

c. David Miller, also known as “Big D,” and “Dido” (“Miller”), resided in Franklin Township, New Jersey, and oversaw the distribution of heroin within the Parkside DTO. Miller obtained “raw” heroin from Webb, which was then packaged for street-level distribution in Parkside. During the course of drug transactions, Miller traveled to or from his Franklin Township residence (the “Miller residence”). Miller drove a 2005 Nissan Pathfinder (the “Miller Pathfinder”), and he used the Miller Pathfinder to acquire drugs from and for co-conspirators. Miller communicated with co-conspirators using multiple cellular phones, including those assigned telephone numbers ending in 3132 (“Miller 3132 Phone”), 3576 (“Miller 3576 Phone”), 1053 (“Miller 1053 Phone”), and 3877 (“Miller 3877 Phone”).

d. Bruce Williams, also known as “B” (“Williams”), resided in Newark, New Jersey, and supplied Webb with some of the “raw” heroin that was later packaged and resold by members of the Parkside DTO. During the course of drug transactions, Williams traveled to or from a Newark residence (the “Williams stash house”). Williams communicated with co-conspirators using a cellular phone, which was assigned a telephone number ending in 8920 (“Williams 8920 Phone”).

e. Juan Peralta, also known as “Papi” or “Papa” (“Peralta”), resided in Newark, New Jersey, and supplied Webb with some of the “raw” heroin that was later packaged and resold by members of the Parkside DTO. During the course of drug transactions, Peralta directed other co-conspirators to meet him at or near a particular residence in Newark (the “Peralta stash house”). Peralta communicated with co-conspirators using multiple cellular phones, including those assigned telephone numbers ending in 1815 (“Peralta 1815 Phone”), 6310 (“Peralta 6310 Phone”), 2268 (“Peralta 2268 Phone”), and 8963 (“Peralta 8963 Phone”).

f. Tamir Styles, also known as “T” (“Styles”), assisted Newsom and others with drug distribution in Parkside. Styles drove a Honda sedan (the “Styles Honda”), which he used to acquire drugs from and for co-conspirators. Styles communicated with co-conspirators using at least two cellular phones, which were assigned telephone numbers ending in 1671 (“Styles 1671 Phone”) and 0050 (“Styles 0050 Phone”). Telephone records list Tamir Styles as the paid subscriber for both phones.

g. Anthony McBride, also known as “Michael McBride” and “Mac” (“McBride”), resided in New Brunswick, New Jersey, and purchased packages of heroin from Newsom. During the course of drug transactions, McBride directed Newsom to meet him at a residence in New Brunswick (the “McBride residence”) used by members of the McBride family. McBride communicated with co-conspirators using at least two cellular phones, which were assigned telephone numbers ending in 6848 (“McBride 6848 Phone”) and 4976 (“McBride 4976 Phone”).

h. Myisha Wilson (“Wilson”) was a romantic companion of Webb who assisted his efforts to supply heroin to members of the Parkside DTO. Wilson resided some or all of the time at the Webb residence. On multiple occasions, Wilson communicated with co-conspirators using the Webb 9675

Phone, as well as her own cellular phone, which was assigned a telephone number ending in 6089 (“Wilson 6089 Phone”).

i. Co-Conspirator E.S. (“E.S.”) was a female companion of Newsom and assisted his efforts to package “raw” heroin for street-level distribution in Parkside. E.S. used an apartment (the “E.S. apartment”) inside the Fulton Square residential development in New Brunswick, New Jersey, where Newsom and others packaged heroin for street-level distribution.

**November 14-18, 2014 Transactions  
(McBride, Newsom)**

5. As discussed below, I believe that between November 14, 2014 and November 18, 2014, Newsom spoke with McBride about multiple heroin transactions. During these conversations, Newsom asked how much drugs McBride wished to purchase, and McBride provided a number (“one,” a “deuce”), which I believe is a reference to bricks of heroin.

6. On November 14, 2014, at approximately 11:28 am, McBride called Newsom. McBride stated “I’m a, uh, I’m a need you, like, before, like—at 12:30.” Newsom responded affirmatively, and McBride stated, “Cause I’m at work. I’m a need you—I’m a, uh, need a deuce [*two bricks of heroin*].” Newsom responded, “I already know.” McBride asked, “Huh?” Newsom responded, “You already told me the other day [U/I].” McBride stated “Yeah, and I’m—the last time I seen you that count was off by two [*McBride believes that, in a prior transaction, Newsom shorted him some of the drugs he was owed*].” Newsom asked McBride to confirm this counting error, and when McBride did, Newsom responded, “Oh, I got you.”

7. On November 14, 2014, at approximately 12:26 pm, McBride called Newsom. Newsom stated, “I’m on my way to you now.” McBride responded, “Yeah, remember the deuce [*two bricks of heroin*].” On the afternoon of November 14, 2014, the parties engaged in several additional calls, during which McBride and Newsom discussed when they would meet in person. When, during a 5:22 pm call, Newsom stated that he was delayed in traffic, McBride responded, “Aight, cause I’m sitting here and I got a nosy sister.” Shortly after that call ended, officers observed Newsom park the Newsom Acura in the vicinity of the McBride residence. Officers observed McBride approach the Newsom Acura and engage in a brief interaction with the

driver. Afterwards, the Newsom Acura drove away and McBride re-entered the McBride residence.

8. On November 17, 2014, at approximately 12:01 pm, McBride called Newsom. McBride stated that he “need to see” Newsom in “about 20 minutes, if possible.” When Newsom asked “What’s the number?” McBride responded, “Just, uh, one [*one brick of heroin*].”

9. On November 18, 2014, at approximately 11:29 am, McBride called Newsom. During the call, McBride asked when they would meet, and added that he was “getting ready to go to my mother’s [*the McBride residence*].” Minutes later, at approximately 11:33 am, Newsom called McBride. A draft, partial transcript of the conversation appears below:

Newsom	OG, what’s the name of that fucked shit up for you? [ <i>asking McBride to identify the ink stamp on a brick of heroin he recently purchased, which was apparently of low quality</i> ]
McBride	The one that you—the one I got?
Newsom	Yeah.
McBride	The one right here. Shoot [U/I], it’s—[sighs]—ah, shit. Some “cut,” Some—you can hardly read the top of it but the bottom of it says “Cut.” [ <i>McBride is attempting to read the stamp on the glassine envelope, which appears to contain two words, the second one being “cut”</i> ]
Newsom	“Double cut.” [PH]
McBride	Yeah—
Newsom	It look like “Double Cut,” [PH] right? In the red [U/I].
McBride	It’s a red stamp—yeah.
Newsom	Oh, I got you. I’m on my way.
McBride	Aight.

10. On November 18, 2014, around the time of the 11:33 call described above, officers observed the Newsom Acura park in the vicinity of the McBride residence. Officers observed McBride approach the Newsom Acura and engage in a brief interaction with the driver. Afterwards, the Newsom

Acura drove away from the vicinity. Based on these observations, as well as evidence collected by a reliable confidential informant, I believe that Newsom sold McBride a quantity of heroin during this transaction.

**November 15, 2014 Transaction  
(Newsom, CC-5592)**

11. As discussed below, I believe that on November 15, 2014, Newsom spoke by telephone with Co-Conspirator 5592 regarding a heroin transaction.<sup>1</sup> During the call, Newsom and CC-5592 discussed Newsom's method of packaging heroin – namely, that he did not “seal” shut his glassine envelopes with tape. A short time later, I believe that the parties engaged in a heroin sale.

12. On November 15, 2014, at approximately 8:18 pm, CC-5592 called Newsom. CC-5592 stated that “I’m about to come towards—toward you, yo.” The parties clarified that CC-5592 was driving in a car. Newsom began to ask, “Oh, what you—”, when CC-5592 interrupted and said, “I need one [*brick of heroin*].” The parties then discussed a place to meet, and eventually agreed on the “pizza parlor” on “Hamilton Street.” Moments after the call ended, Newsom called CC-5592 back. Newsom stated, “Hey—hey cuz. The only thing, like, ain’t, is—is, the whole thing, but ain’t no tape. [*The glassine envelopes are not sealed with tape.*] They got no tape on them.” CC-5592 responded, “Aight.” Newsom reiterated, “You gotta tape them yourself.”

13. On November 15, 2014, at approximately 8:30 pm, CC-5592 called Newsom. CC-5592 stated that he was “on the side street by, um, Family Dollar [*referring to a retail store on Hamilton Street*].” I am familiar with the location that CC-5592 identified, and I know that officers have observed Newsom complete suspected heroin transactions in that immediate vicinity. Around the time of the 8:30 pm call, officers observed two vehicles approach Hamilton Street in the vicinity of the “Family Dollar” store: the Newsom Acura, and a black Chevrolet Impala. Officers observed the two vehicles pull side-by-side, at which point the occupants of the two vehicles reached out of their respective

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<sup>1</sup> For the purposes of this Criminal Complaint, uncharged co-conspirators are identified by the last four digits of their telephone numbers. Thus, Co-Conspirator 5592 spoke with Newsom using a telephone number ending in “5592.” At various points in this Criminal Complaint, “Co-Conspirator” is abbreviated as “CC.”

windows and engaged in a brief transaction. Minutes later, at approximately 8:38 pm, Newsom called CC-5592. CC-5592 stated, "What's now, I got 'em. I got some, cuz. I'm good." Newsom responded, "Aight."

**November 27, 2014 Transaction  
(Newsom, Webb)**

14. As discussed below, I believe that on November 27, 2014, Newsom and Webb spoke by telephone multiple times regarding a heroin purchase. During these conversations, Newsom stated to Webb that he wished to purchase 20 grams of raw, unpackaged heroin (which Newsom would then package into bricks and distribute in Parkside). Later that day, Webb drove the Webb BMW to the Newsom residence and I believe that he sold Newsom the heroin as requested.

15. On November 27, 2014, at approximately 9:43 am, Newsom called Webb. Newsom stated, "It—it look like it's gonna be the—uh—uh, the 20 cent [20 grams of raw heroin]." Webb responded, "Damn. How you was gonna put it for the 20 and—and ain't shit down there [*asking why Newsom wants 20 grams*]." Newsom responded, "The reason why is be—because—because [OV]—Big bro, like I said, hear—hear me out my nigga. If you wanna do something, you can. But the only reason why I keep it low like that is because I already said—I already go the people that could cover it [*Newsom already has willing buyers of the heroin*], and I'm trying to play it safe. But whatever you wanna do, I could handle it my nigga. You know I ain't got no bullshit." Webb asked, "Say it again." Newsom responded:

I said, whatever you wanna do, I could handle it—I'm not about no bullshit, but I am trying to play it, you know, real cautious right now—right now. Then, when the floodgate open, you know, I'm open and shit. [*Newsom is being cautious with his drug activity, but expects to significantly expand his operation in the near future.*] But it's up to you.

Later in the call, Newsom stated, "Bring me 10 cent," and explained that he "got the money for it." Webb then sought to clarify whether Newsom wanted 10 or 20. Newsom stated, "I got my own money for my own time—I need that 10, though." Newsom asked how long it would take for Webb to deliver the drugs to him, and Webb responded, "I'll call you when it's in my hand and I'm on—on the move."

16. On November 27, 2014, at approximately 1:07 pm, Webb called Newsom. Newsom asked, “You on your way?” Webb stated that “I’m on my way now,” and added, “I’ll hit you [*call you*] when I, uh, get off—nah, I might not even take the Turnpike there.” About forty minutes later, at approximately 1:49 pm, Newsom called Webb. Newsom stated, “I’m at my spot [*the Newsom residence*].” Webb stated, “I’m about to—I’m about to get on 18 [*Route 18, which runs the Newsom residence*].”

17. On November 27, 2014, shortly after the 1:49 pm call described above, officers observed the Webb BMW park in the vicinity of the Newsom residence. A short time later, officers observed the Webb BMW turn onto Hamilton Street and drive away from the area.

18. On November 27, 2014, at approximately 2:03 pm, McBride called Newsom. McBride stated, “I’m calling because people seem to be blowing up my phone [*he is receiving multiple calls from potential drug customers*].” Newsom responded, “Aight, you, um—you want it to be a deuce or a single?” McBride stated, “Remember, before it was, uh, one yours, one mine, remember?” Newsom responded affirmatively, and McBride added, “Aight, just, uh, bring me whatever you want to bring, man. You know, nothing else. I’ll make sure it’s alright. Um, alright, yeah, as long as it’s different from that and it’s better [*higher quality than the previous drug supply*], bring it.” Newsom said he would make a delivery to McBride, and McBride responded that he would be “at my mother’s house.”

**December 2, 2014 Phone Conversation  
(Newsom, CC-3930)**

19. I believe that on December 2, 2014, Newsom spoke by telephone with Co-Conspirator 3930. During the call, Newsom and CC-3930 discussed Newsom’s drug turf. At one point during the call, CC-3930 asked Newsom to “come to that restaurant on Hamilton Street and park by the back.” CC-3930 clarified that he was referring to “that Portuguese spot right there by the corner.” Newsom responded, “Shit, nah. I don’t go there.” When CC-3930 asked for clarification, Newsom responded, “Yeah, I know what you talking about. Well—well, I’m a come that way. I won’t sell my product [*drugs*] there, though. We ain’t got no business right there, man.”

**January 22-24, 2015 Transaction**  
**(Miller, Webb, Williams, Wilson, CC-6070, CC-0550)**

20. As discussed below, I believe that on January 22, 2015, Webb sold a quantity of raw heroin to Miller. Later that day, Webb was assaulted in Franklin Township and briefly hospitalized. During his hospital stay, Webb was at certain times unable to speak by telephone, and so his romantic companion, Wilson, carried on the affairs of his drug trafficking operation in his absence. Over the next few days, Webb and Wilson made numerous calls, and during these calls, they discussed with co-conspirators the details of the assault and of Miller's complaints regarding the heroin that Webb sold him on January 22. In particular, Webb and Wilson explained to co-conspirators that Miller tried to return the heroin to Webb (on account of its low quality and "brown color"), which led to a dispute about how much money Miller owed Webb for the heroin. On January 23, 2015, Williams (Webb's supplier of the January 22 heroin) got involved in the dispute, and on January 24, 2015, Williams and Webb confronted Miller in a phone call, after which Williams and Webb drove from Newark to a McDonald's in New Brunswick, New Jersey to collect money from Miller.

21. On January 22, 2015, at approximately 1:54 pm, officers observed Miller parking the Miller Pathfinder in front of the Webb residence in Newark. Minutes later, Webb drove the Webb BMW to the Webb residence and parked the car inside an attached garage. Miller then exited the Miller Pathfinder and walked into the garage, after which the garage door closed. At approximately 2:05 pm, Miller exited the garage, returned to the Miller Pathfinder, and drove away. Less than 45 minutes later, at approximately 3:42 pm, officers observed Miller park the Miller Pathfinder in the driveway of the Miller residence in Franklin Township, and then quickly depart in the direction of Hamilton Street. Miller drove the Miller Pathfinder to a deli and to a residence (the "Miller stash house") on Hamilton Street where officers have previously observed Miller and others congregating.

22. On or about the evening of January 22, 2015, Webb was assaulted on Somerset Street in Franklin Township. The following day, on January 23, 2015, Webb discussed the details of the assault with several individuals, including Newsom and Wilson. During these calls, the parties attempted to identify Webb's assailant(s).

23. On January 23, 2015, at approximately 1:54 pm, Co-Conspirator 6070 called Webb. The parties discussed Webb's assault, as well as the quality of the "brown" heroin that Webb sold to Miller the day before. A draft, partial transcript of the conversation appears below:

CC-6070           Who fucked the [U/I]?

Webb               Yeah, man.

CC-6070           How he fuck it up?

Webb               Because he—them niggas don't like that brown—brown—brown down there [*individuals in the Parkside neighborhood don't like brown-colored heroin*], and D [*David Miller*] gave them some brown shit. Like, niggas—niggas don't even wanna deal with that. As soon as they see it they was like, 'nah.' Big Bro said he looked—he ain't really look at it yesterday when he got it, so no when I go down there to get it changed he giving it back. [*Webb had to return to the Parkside neighborhood after Miller complained about the heroin quality*]. He gave—he gave—he gave a hundred pieces back. [*Miller returned to Webb 100 grams of raw heroin*].

CC-6070           Soon—soon as that shit would've happened—soon as that shit would've happened, I'd came back and be like, 'Yo, niggas robbed me, yo.'

Webb               Yeah.

24. On January 23, 2015, at approximately 7:47 pm, Wilson used Webb 9675 Phone to call Co-Conspirator 0550. The parties discussed Webb's assault, as well as the quality of the "brown" heroin that Webb sold to Miller the day before. A draft, partial transcript of the conversation appears below:

CC-0550           You said this shit happened last night?

Wilson             Yeah, I told him, cause it was late. He probably went down there at, like, 2 o'clock in the afternoon. He hit me at 9, like, 'I'm about to down,' like—I'm like, 'It's late as hell, why you going down there now?' I'm like, 'You was supposed went this afternoon.' He like, 'Well, you know Old Boy just called him.' And he gotta go pick the money up [*Webb needed to travel to Parkside, so that Miller could pay him for the drugs*]. I'm like, 'Aight.' You

know what I'm saying, 'It's late as hell, like, you doing down there.'

CC-0550 You guess he never met up with the niggas.

Wilson No, well, eventually, you know after the shit happened but he waiting for the guy to come. You know he taking the [U/I] and shit— [OV]

CC-0550 He still met up with the nigga after the shit, you saying?

Wilson Yeah, yeah, yeah. All for the nigga to say he don't even want the shit, cause the shit too brown. *[Miller informed Webb that he did not want the "brown" heroin he had previously purchased, because of its low quality]*

CC-0550 You think the nigga set him up and shit?

Wilson I don't—well, he ain't—they ain't—they ain't try to rob him or nothing. You know what I'm saying? So I don't know, I don't know . . . .

25. On January 23, 2015, at approximately 8:17 pm, Wilson used Webb 9675 Phone to call Miller. Wilson explained to Miller that she was using Webb's phone, and then asked, "Are you still coming up here?" Miller responded affirmatively, saying that he was waiting for someone else but planned to leave within the hour. Miller explained that he would call Wilson before leaving, then added, "But if not, like, he now—but if not, I'll do it first thing in the morning, or if you need it tonight, I'll do it tonight." Wilson stated, "Alright, then, well, either way, just hit me [*call me*]." As soon as the conversation ended, Wilson called Williams. She briefly recounted her call with Miller, then added, "He like, 'Well, you know I'm good for it.' But I'm like—you know I said, 'Hit me when you're on your way up or whatever.' So he was like, 'Aight.'"

26. On January 24, 2015, at approximately 6:33 pm, Webb called Williams. Williams expressed frustration about the current situation, and Webb replied that he didn't know "shit was fucked up." Williams and Webb agreed to meet. The parties then met in person and, about an hour later, at approximately 9:32 pm, made a joint phone call to Miller (the "9:32 pm call"). Webb began the conversation, and a short time later, Williams took the phone and continued the call with Miller.

a. At the beginning of the 9:32 pm call, Webb asked Miller, “Bud [*Williams*] said, ‘When you coming drop that off or you come and get it?’ Cause you kind of holding him up.” Miller responded, “I ain’t holding him up.” A short time later, Miller said, “Hey, bro, if you want to get the bread [*money*] right now—if you want to come get it, you can come get it. [*Miller telling Webb and Williams that they can drive to Parkside to collect the money from him*]. I’m not doing that shit. I ain’t playing them games.” Webb asked, “Why can’t you bring the bread?” Miller responded, “I’m in the fucking house right now. I’ll bring it in the morning or something. I ain’t coming tonight, man. I’m tired.” Webb stated that Williams would drive down to Miller’s neighborhood to collect the money, and the parties agreed to meet at a McDonald’s restaurant in the area.

b. Webb then handed the phone to Williams. Williams stated to Miller, “Yeah, you said you didn’t like the brown [*brown colored heroin*]. Like, if y’all would have—that right there was that greyish-like—that shit is good as hell, but y’all didn’t try it. I understand you didn’t want it. You understand where I’m coming from.” Miller responded that he lost several customers because of the heroin he purchased from Webb, and said that “I’ll go wherever I have to go to find it [*Miller will seek out other sources of supply if necessary*]. . . . Like, I don’t mind helping Farod [*Webb*], I rather do for a nigga I grew up with than anybody else. This is my whole thing—it was 14 grand and then some more. Like, niggas was just waiting for me. This is what I could have did for you, like, one wad—it could’ve, like, 14—it could’ve been 18, it could’ve been 21, it could’ve been whatever [*had things gone differently, Miller could have made as much as \$21,000 off the drug deal*].” After further discussion, Williams informed Miller that he (Williams) and Webb would drive down to Parkside to collect money from Miller.

27. On January 24, 2015, at approximately 9:46 pm (less than 10 minutes after the 9:32 pm call ended), CC-6070 called Webb, and Webb stated that “I’m about to go right back down there to New Brunswick.” A short time later, at approximately 10:29 pm, officers observed Webb and Williams arrive at the McDonald’s in New Brunswick. At approximately 10:47 pm that night, Miller called Webb. Miller asked, “You still out here?” Webb responded affirmatively, and Miller stated, “Yo, we just talking about that shit, man. I just spoke to my cousin just now. He said he need the same thing, like, asap. [*Miller’s cousin wants to buy heroin from Webb*].”

**January 25, 2015 Transaction  
(Miller, Webb, Williams)**

28. As discussed below, I believe that on January 25, 2015, Webb brokered the sale of approximately 110 grams of raw heroin, which was supplied by Williams and sold to Miller. Webb arranged the sale by telephone, and shortly before 11:00 am, the three men met at the Webb residence. Later that day, Webb and Miller discussed the quality of the product by phone, and Miller returned to the Webb residence in the afternoon.

29. On January 25, 2015, at approximately 9:55 am, Williams called Webb. Webb stated, "Ol' Boy wants 110 [*Miller wants to buy 110 grams of heroin*]." Williams responded, "Aight. Where they at?" Webb stated, "He on the way now." At approximately 10:36 am, officers observed Miller park the Miller Pathfinder in front of the Webb residence and remain inside the vehicle. Minutes later, at approximately 10:43 am, Webb called Williams. Webb stated, "You ready? Oh, shit. He at the crib [*indicating that Miller had arrived at Webb's residence*]." Williams asked, "He there?" Webb responded affirmatively, and Williams stated that he was "about to come around the corner." Moments later, officers observed Williams park a black pick-up truck in front of the Webb residence. Officers observed Miller exit his vehicle and approach the passenger side of Williams's vehicle. The parties interacted briefly, and Miller returned to his vehicle and drove away. After Miller departed, Williams called Webb, stating "Ol' Boy could have done that last night [*Miller could have completed the drug deal the night before, had he been willing to travel to Newark*]." Webb responded, "He said he was going to try to run it up, but he said he was tired, though."

30. On January 25, 2015, at approximately 1:23 pm, Webb called Miller, and they discussed Miller returning to Newark later that day. Miller stated that his return would "probably be around 5 or 6, maybe 7 [*pm that evening*]." Later in the call, Miller indicated that another buyer, who he described as "T," also received low quality heroin from Williams. At approximately 1:25 pm, Webb called Williams, and stated "he [*Miller*] said he probably slide up, like, maybe 5 or 6 [*pm*], cause his wife doing something or whatever." Williams responded, "Aight."

**February 2, 2015 Transaction**  
**(Miller, Newsom, Webb, Williams)**

31. As discussed below, I believe that on February 2, 2015, Webb brokered the sale of approximately 40 grams of raw heroin. Webb obtained the heroin from Williams in Newark, and then drove it to Parkside, where he sold 20 grams to Newsom and 20 grams to Miller.

32. On February 2, 2015, at approximately 6:02 pm, Webb called Newsom. Newsom asked, “What’s it look like? [*When will the next supply of heroin arrive?*]” Webb responded, “It’s in the building.” Newsom stated, “Oh, aight, shit, bring me a quick 20 [*grams of raw heroin*], man. It’s aight, it’s decent? [*Is the quality good?*]” Webb responded that he had not yet inspected the quality of the product. Webb then quoted Newsom a price of “80” [*\$80 per gram of raw heroin*]. Newsom stated, “If that shit at 8, just bring me 10” [*If you’re charging \$80 per gram, then I’ll only buy 10 grams, not 20*].” Webb agreed to check the price and call him back. Several minutes later, at approximately 6:06 pm, Webb called Newsom. Webb stated that he “talked to my buddy” and was willing to charge “75” rather than “80.” Later in the call, Newsom stated, “If it’s for the 7-5, then it’ll be a 20. But if it’s for the 80, then it’s just 10.” Webb responded affirmatively and promised to call Newsom “when everything together.”

33. On February 2, 2015, at approximately 6:10 pm, Webb called Miller and stated that “it’s in the building [*The drugs have arrived.*]” Webb stated that, “I ain’t go look at it yet, when I go look at it I’ll call you and let you know . . . If it—if it—if it ain’t brown.” [*Webb plans to inspect the heroin to ensure that it’s not “brown”*]. Webb confirmed that, “first, you want me to see what it is first,” and Miller responded affirmatively. Webb stated that he would contact Miller shortly, but that he “just gotta wait for my wife [*Wilson*] to come back in the house.”<sup>2</sup> Several hours later, at approximately 9:06 pm, Miller called Webb to discuss plans. Webb stated that he was “gonna go check it out and bring it down [*inspect the heroin and then deliver it to Parkside*].” Miller responded, “I mean, as long as it’s—as long as it’s one piece, it’s sufficient my

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<sup>2</sup> A minute earlier, at approximately 6:09 pm, Webb called Wilson and stated, “I’m a have to make a run, yo, cause that shit on deck.” [*I need the car so I can make a drug delivery.*] Wilson asked, “Really?” Webb responded, “Yeah, [U/I]. Just hit me with like, ‘We in there.’ So we trying to—whenever you, whenever you get yourself, finish doing what you’re doing. Aight?”

nigga—like, none of that brown shit, man.” Webb stated, “I already know. Alright.” Miller stated, “As long as it’s a hundred.” Webb responded, “Alright, I got you.”

34. On February 2, 2015, at approximately 9:23 pm, Webb called Williams. Webb stated, “I’m a see you in a little bit.” Williams responded, “Don’t pull up in the front of the house, you’ll get stuck. [*Likely, a reference to snow and ice in front of Williams’s residence*].” Less than ten minutes later, at approximately 9:31 pm, Williams called Webb to ask when he would arrive at Williams’s residence. Williams stated that “you been saying you coming for hours,” and that “I gotta make a run, bro [*I have other evening plans*].” Webb responded, “My wife just came back to the house,” and stated that he would come to Williams’s residence momentarily. Williams asked, “Ah, yeah, where they at, you gotta go down there? [*Are you planning to drive to Parkside to deliver the heroin?*]” Webb responded affirmatively, and Williams asked him to “hurry up, bro.”

35. On February 2, 2015, at approximately 9:44 pm, Webb called Miller to discuss the heroin sale. Webb indicated that he inspected the heroin, stating “it ain’t—it ain’t brown.” Webb then asked, “What you, uh, want me to get? [*How much heroin do you want to buy?*]” Miller responded, “Right now, 20 [*grams of raw heroin*]. I don’t want to take it and . . . Just give the rest tomorrow [*Miller wants 20 grams tonight, and will buy another batch the following day*].” Webb stated, “Okay, I got you.” Miller stated, “So, I just need something to put out there tonight.” Webb responded affirmatively, and Miller stated, “See what they say. Shit’s golden—we’ll do it tomorrow.” Webb stated that he would call Miller as he was driving down to Parkside to make the delivery.

36. On February 2, 2015, at approximately 10:16 pm, Newsom called Webb. Webb stated, “I’m on my way down there.” Newsom resisted, stating, “I rather you come tomorrow, so I could get everything all together, till I get all the numbers out, you know what I’m saying?” Webb responded, “Yeah, but I gotta come down there anyway [*referring to his heroin delivery to Miller*].” The parties disagreed about whether Webb would make the delivery that night or the following day. Newsom stated, “Don’t put it in your house—keep it til tomorrow.” Eventually, Newsom relented, asking Webb to call him “when you get close.”

37. On February 2, 2015, at approximately 10:45 pm, Webb called Newsom, stating, “Yeah, I’m right here by the ice cream parlor.” Several minutes later, at approximately 10:52 pm, Webb called Miller, stating “Yeah, I’m outside.”

38. On February 3, 2015, at approximately 11:07 am, officers observed Newsom arrive at the Miller residence to meet with Miller. Less than thirty minutes later, at approximately 11:32 pm, Webb called Newsom to express frustration. Webb asked, “Yeah, hey, yo—you . . . you fuck with Big D? [*Do you do business with Miller?*]” Newsom asked, “With Big D?” and then responded affirmatively. Webb asked, “You told him I gave you something? [*You told Miller that I sold you heroin?*]” When Newsom responded affirmatively, Webb stated, “Damn, bro, why you—you—telling, why—why you telling him what I gave it to you for? [*Why did you tell Miller how much I’m charging you for heroin?*] Like, that’s between me and you, whatever that shit go down. Like, now he on some other shit, like, cause I charge him more. [*Miller is angry at Webb because he learned that Newsom gets raw heroin from Webb at a cheaper price.*]” Later in the conversation, Newsom stated, “Listen, what I was trying to do—I was trying to tell the nigga [*Miller*] that it’s around—so what I’m trying to do is tell the nigga they better get with you [*I was trying to encourage Miller to conduct drug business with you.*]” Webb responded, “I know, I ain’t saying nothing, but whatever—just keep it between me and you [*In the future, do not tell Miller what I’m charging you for raw heroin.*]” Newsom said, “Yeah, aight.”

**February 3, 2014 Phone Conversation  
(Styles, Webb)**

39. I believe that on February 3, 2015, at approximately 2:52 pm, Styles called Webb. Webb stated that he had recently heard from his supplier and that he was ready to conduct business. Styles asked, “What number I’m get? [*How much heroin can I buy?*]” Webb responded, “I said, you should let me know whatever you wanna do.” Styles stated, “Yeah, I mean, uh, I gotta know this shit official, you know what I’m saying? [*I need to know that this is high quality heroin.*]” Webb stated, “Yeah, I already told you it’s [U/I] gonna be brown, yo. [*The heroin is going to be brown colored.*]” Styles responded, “Yo, keeping it real Farod, I don’t matter the color.” Later in the conversation, Styles reiterated, “My peoples ain’t off that color shit, know what I’m saying? . . . They just want that shit to be good [*My customers do not care if the heroin is brown in color; they just want a high quality product.*]” Webb responded, “Alright, as soon as he hit me, I’ll hit you.”

**February 12-13, 2015 Transaction  
(Peralta, Webb)**

40. As described below, I believe that, on February 12, 2015 and February 13, 2015, Webb participated in multiple telephone calls with Peralta and Peralta's associates, during which Webb expressed an interest in purchasing bulk quantities of drugs from them. On February 13, 2015, Webb purchased a quantity of heroin from Peralta at the Peralta stash house. In a call with Miller, Webb indicated that Peralta sold raw heroin that was "gray" in color.

41. On February 12, 2015, at approximately 2:17 pm, Peralta called Webb. Peralta asked, "How many you want?" After confirming that they would meet shortly, Webb stated, "I need—I need—I need, um, 20 [*grams of raw heroin*]. Right now." Peralta responded, "Okay, [U/I], okay." Webb then stated, "I don't want no—no—no powder, rock." Peralta stated, "Alright, okay." Over the next several hours, Peralta and Webb exchanged several calls, during which they agreed to meet "at the barbershop." Later that day, at approximately 5:24 pm, Peralta called Webb and asked if Webb was "around tomorrow." Webb responded that he was, and stated, "Yeah, I—I—I don't want no—I don't want no soft shit." Peralta stated, "Oh, okay, alright."

42. On February 13, 2015, at approximately 11:57 am, Miller called Webb. Webb explained that he had not spoken with Williams recently, but that he was pursuing another possible heroin supplier (i.e., Peralta). Webb stated, "I ain't—I ain't talk to Bro [*Williams*] this morning so—but I came across something else, though. That shit—that color you like, though, like—." Miller expressed interest, and Webb responded, "But I'ma, um—he supposedly—supposedly coming to me now. I'm about to see what it is. Um, that gray—that gray color [*gray-colored heroin*]." Webb added, "Yeah, so he—I talked to him and said he gonna come by the shop, so I'm just waiting of that—on him to come by the shop. So when he come by, I'ma look, I'ma see, I'ma check it out." Miller asked about the prices charged by this potential new supplier, and Webb responded, "I talked to him [*Peralta*], you know what I'm saying, so it ain't no more [*Peralta is charging the same price as Williams*]."

43. On February 13, 2015, Peralta and Webb engaged in several additional calls, during which they discussed whether to meet at the "barbershop" or at the Peralta stash house. At approximately 1:11 pm that day, Webb called Peralta to state that he was "outside" the Peralta stash house.

Around this time, officers observed Webb park the Webb BMW in front of the Peralta stash house and then, a short time later, drive away. At approximately 1:45 pm, Peralta called Webb and told him to “call me this number [*providing Webb with Peralta’s cell phone number for future drug deals*].” Webb responded, “Alright, cool, I got you.”

44. On February 13, 2015, at approximately 8:19 pm, Webb called Peralta. They agreed to meet the following day at “10 o’clock.” Webb stated, “Look! Listen, right listen—I got somebody that want to talk to you. He wants to buy a lot of shit.” Peralta responded, “Okay, I see you tomorrow.”

**February 16-19, 2015 Transaction  
(Newsom, Peralta, Styles, Webb, Wilson)**

45. As discussed below, I believe that, on February 19, 2015, Webb brokered the sale of approximately 50 grams of raw heroin in the vicinity of the Peralta stash house. After several days of phone conversations beforehand, Webb arranged for Peralta to sell the product to Newsom and Styles. (At one point, the parties agreed that Newsom would purchase 35 grams and Styles would buy the other 15 grams.) Peralta required an upfront payment for the drugs – i.e., he refused to let Webb and his buyers “front” the cost of the heroin – and so Newsom and Styles traveled to Newark to meet with Peralta and Webb in person to conduct the transaction.

46. On February 16, 2015, at approximately 9:44 am, Newsom called Webb. Webb asked, “What’s good?” Newsom responded, “At least, at least 30 [*seeking to order at least 30 grams of raw heroin*]. Several hours later, at approximately 12:22 pm, Webb called Peralta. Webb asked, “We can do something today? [*Can I buy heroin from you today?*]” Peralta responded affirmatively and asked “How many?” Webb responded, “30—35.” Peralta asked for clarification and Webb stated “35.” The parties agreed to meet in half an hour.

47. On February 16, 2015, at approximately 1:15 pm, Webb called Peralta to increase his drug order. Webb stated, “Yo, Pa, I need, um, 15, too.” Peralta clarified, “You want 35 and 15? [*You want to place one order for 35 grams and another order for 15 grams?*]” Webb responded, “Yeah, 35 and 15.” Later that afternoon, Webb tried to call Peralta multiple times, but received no answer. At approximately 3:35 pm that day, Newsom called Webb. Webb stated, “I’ve been trying all morning. One of them was supposed to have gotten

back at me but, shit, he ain't never, um—he ain't even answering the phone now. So I'm trying—trying—trying something—something else.” Newsom responded, “Maybe—maybe the next day, then.”

48. During the morning and early afternoon on February 17, 2015, Webb placed calls to Peralta and his associates, seeking to confirm his drug order. Also that day, Newsom called Webb, seeking an update on the order.

49. On February 17, 2015, at approximately 2:33 pm, Wilson called Webb. Wilson stated to Webb that she had recently communicated with “Old Boy” about drug prices. She stated that, “at first, he was saying that he get it for 68 [*Old Boy buys raw heroin at \$68 per gram*]. You know what I'm saying? So I'm like, ‘Damn,’ said ‘Well, alright.’ I said, you can't 65, at least 65. If you getting it for 68 that means you talking like 70, nah. [*If he buys heroin for \$68 per gram, then he likely marks up the resale price to \$70 per gram*]. I said, at least do 65, but you said you do 70, 75, right?” Webb responded affirmatively. Later in the call, Wilson asked, “So what he mean, or what I'm supposed to say?” Webb responded, “Tell—tell him 65.” Wilson stated, “Yeah, but I told him that he saying he getting it for 68, so how the fuck?” A short time later, Wilson stated, “I'm about to text him now.” Webb responded, “Check my phone. Cause, shit—all them niggas hit me. Big D [*Miller*] hit me, Spree [*Newsom*] hit, and T [*Styles*] hit me—all them niggas hit me.” Webb added, “Cause, yo, these niggas is calling me. All day I've been calling to [U/I] the same time. So, shit, I don't know what's up with D ass. Papi ass [*Peralta*] ain't answer the phone, so I don't even fucking know. [*Miller, Newsom, and Styles are pressuring Webb to supply heroin, but Peralta is not returning Webb's calls*].”

50. On February 17, 2015, at approximately 3:22 pm, one of Peralta's associates (speaking heavily accented English) called Webb to discuss the heroin order. In the background of the call, another voice can be heard with Peralta's associate (believed to be Peralta himself).<sup>3</sup> The associate asked if Webb wanted to purchase heroin in “brick” form (i.e., pre-packaged for street-level re-sale), but Webb reiterated that he needed two orders – 35 grams and 15 grams – of raw heroin (i.e., in “loose” form). A draft, partial transcript of the conversation appears below:

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<sup>3</sup> At the beginning of the call, the background voice can be heard saying, “Asshole [U/I] calls me so much,” likely a reference to Webb's repeated efforts to get in contact with Peralta over the preceding days.

Webb                    You ready for me?

CC-8963                I wanna know—I wanna know, you wanna buy a brick?

Webb                    Huh?

CC-8963                I wanna know if you wanna buy a brick?

Webb                    I told Pa I don't want no brick—

CC-8963                Huh?

Webb                    I told him I want it loose [*raw heroin*].

CC-8963                Oh.

Webb                    Damn. I need thirty—I need—I need 35 grams and 15 grams. Not no coke, smack. [*Webb clarifies he wants to buy heroin, not cocaine*]

CC-8963                Yeah, but I don't have what you need now. I try—I try making you some brick if you want.

Webb                    I told Papi [*Peralta*] he already know what I need. He came with it before and then he left. I told him I need it straight—I don't want no bricks.

CC-8963                Okay, no problem.

Webb                    So what we gonna do?

CC-8963                I no found out—I don't found it too much. I just that little bit like good. I can sell [U/I]—

                              [Background voice: "Tell him tomorrow!"]

CC-8963                Maybe tomorrow.

Webb                    Ya keep—ya keep telling me. Papa already know where it is. He told me yesterday.

51. On February 18, 2015, at approximately 11:47 am, Webb called Peralta. Webb asked, "What's good?" Peralta responded, "Later on. Okay. I got it [*I have obtained the heroin you ordered*]. Okay?" Webb asked, "You got it?" Peralta confirmed, "Yeah, I call you." Several hours later, at approximately 2:02 pm, Newsom called Webb. Webb stated that he was still waiting for his drug supply, and the parties discussed Webb's challenges in obtaining heroin at a reasonable price.

52. On February 18, 2015, at approximately 2:17 pm, Webb called Peralta. Webb confirmed that he wanted "35 and 15," and Peralta responded "That's a 3,500 [*\$3,500 for a combined 50 grams of raw heroin*]." Webb

indicated that the price was acceptable. Peralta asked, “You got it? [*Do you have the money available to pay me?*]” Webb responded, “Listen Pa, you gonna ride with me, so we can go get the money” – indicating, in effect, that Webb would let Peralta travel with him to collect the money from those seeking to obtain the heroin (i.e., Newsom and Styles). Peralta responded, “Aight.” Several minutes later, at approximately 2:20 pm, Webb called Peralta back to question him on the price. Webb asked, “Pa, what you mean \$3,500? You told me 55 a piece [*Webb thought they had previously agreed to \$55 per gram of raw heroin, which would have resulted in a total price of approximately \$2,750 for 50 grams*].” The parties then disagreed whether the price was \$55 or \$65 per gram, and Webb eventually relented and agreed to pay the higher price. Peralta asked, “You don’t want it?” Webb replied, “Yeah, I do, I do, I do.”

53. On February 18, 2015, at approximately 8:22 pm, one of Peralta’s associates called Webb to discuss a meeting place. The associate provided Webb with a street address in Newark—a building adjacent to the Peralta stash house. Webb agreed to meet there, and the associate asked Webb to call when he arrived. A short time later, officers observed Webb depart the Webb residence and drive the Webb BMW to the vicinity of the Peralta stash house. At approximately 8:37 pm, Webb called Newsom to confirm that he still wanted 35 grams of heroin, and Newsom indicated that he wanted “between 30 and 35,” but that he wanted to double-check. Around that time, at approximately 8:40 pm, officers observed Webb exit his vehicle and enter the Peralta stash house.

54. On February 18, 2015, at approximately 8:45 pm, Newsom called Webb to discuss the drug transaction. Webb complained that Peralta was refusing to “front” Webb for the cost of the drugs, and so Webb would need to collect money from Newsom and his other buyer (Styles) before he could complete the transaction. Webb explained, “I’m trying to fuck with the Papi [*Peralta*] – the shit good [*it’s a high quality product*]. But the nigga don’t trust me to take it down and bring it back. He want me to come down there [*to Parkside*] and get the money and tell—I said I’m not doing that, man. I said, ‘Bro, I can go down there and get the money and give to him and I come back.’ He don’t trust me.” As soon as the call ended, at approximately 8:47 pm, Webb called Wilson to express his frustration about Peralta’s refusal to front the drugs, as well as about the price that Peralta was charging for the heroin. Wilson said, “Oh, Papi is terrible.” Webb responded, “Papi is a bitch.” Several hours later, at approximately 10:33 pm, Miller called Webb, and Webb told him that he (Webb) “came across some great shit [*Peralta’s heroin supply*].” Webb

added that “these Papi’s niggas” were “playing too much” and “get[ting] on my nerves,” but that “my man, he gave me sample and shit . . . and said shit is alright.”

55. On February 19, 2015, at approximately 10:18 am, Newsom called Webb to discuss the drug deal with Peralta. Newsom stated, “Um, if that thing is one piece, yo, motherfucking ‘T’ said he’ll bring me out there. Me and the nigga get to split it [*If Peralta delivers the heroin in a single package (rather than divided between the separate orders of 35 grams and 15 grams), then Newsom and Styles (‘T’) will meet to divide the drugs.*]” The parties discussed the possibility of Newsom traveling to Newark to complete the purchase. Later in the conversation, Newsom stated, “Yeah, so, and you said with the 5-0. So T [*Styles*] hit me this morning, like, ‘Yo, what’s up you found some?’ I’m like, ‘Shit, nah, I’m like might need a ride up top.’ He’s like, ‘Aight.’” Several minutes later, Webb called Peralta to confirm the transaction. Webb stated, “they gonna come up here—they gonna come up here with the money.”

56. On February 19, 2015, at approximately 10:44 am, Webb called Styles. Webb asked, “You bringing—you bringing Spree out here? [*Are you and Newsom driving to Newark to purchase the heroin?*]” Styles responded affirmatively. Webb asked when “y’all coming,” and Styles replied that he was going to find Newsom and then they would travel to Newark. Styles stated, “Yo, don’t make me come out here again for nothing again, Farod.” Webb responded, “Bro, listen man, I just called him [*Peralta*] and he said it’s there.”

57. At approximately 11:00 am, officers observed Styles driving the Styles Honda in Somerset, New Jersey. At approximately 11:19 am, officers observed Styles park the Styles Honda in front of the Newsom residence; Newsom exited the residence and entered the passenger seat of the car. A short time later, at 11:26 am, Styles called Webb and stated that “I’m taking the Parkway.”

58. On February 19, 2015, at approximately 11:56 am, Webb called Peralta and asked him to “come to the barbershop.” Peralta agreed. A minute later, Webb called Peralta and asked him to “bring both [*the 35 grams and the 15 grams.*]” Peralta agreed.

59. On February 19, 2015, at approximately 12:08 pm, Styles called Webb. Styles stated, “We outside.” Webb responded, “Aight, come in the shop.” Two minutes later, at approximately 12:10 pm, Webb called Peralta and

stated, “Come on, Pa, he here waiting—he here waiting.” Around this time, officers observed the Styles Honda parked in front of the Webb barbershop. Styles and Newsom then exited the vehicle and walked toward the Webb barbershop. A short time later, officers observed Peralta and another male exit the Peralta stash house and walk towards the Webb barbershop. Officers then observed Peralta enter the Webb barbershop.

60. At approximately 12:22 pm, officers observed Styles, Newsom, Webb, and Peralta exit the Webb barbershop. Styles and Newsom returned to the Styles Honda, which then departed the area. Webb, Peralta, and a third individual then departed in a separate vehicle.

61. On February 19, 2015, at approximately 12:49 pm, Webb called Styles regarding a discrepancy in the payment for the drugs. Webb asked, “How much ya gave me altogether? Cause the money missing.” Styles stated, “It was 35 [\\$3,500].” Webb stated, “He saying—he saying it’s short [*Peralta has told Webb that he thinks Styles and Newsom underpaid for the drugs*].” Several minutes later, Webb called Styles and stated, “Yeah, I’m missing a hundred dollars, yo.” Styles asked, “A hundred dollars?” Webb responded, “It’s supposed to be 36 [\\$3,600] altogether.” The parties disagreed about the price, and Styles asked, “Wait, wait, wait. How much is he giving a gram for?” After cross-talk, Styles asked, “Yo, how much is a gram? It’s—it’s not 70?” Webb responded, “Seventy—seventy—75.” Styles stated, “Man! You didn’t say all that, Farod. Cause I wouldn’t have come and got that shit.” Styles added, “Aight, I’ll have to bring it another day.” Styles reiterated that he should have been warned about the price beforehand, and Webb stated, “Cause that’s what—we sitting here, going through the money now. I’m like, ‘It can’t be.’ It gotta be right.” Styles responded, “Yeah, I gave him 35.”

**March 1, 2015 Transaction  
(Newsom, Peralta, Webb)**

62. As discussed below, I believe that on March 1, 2015, Webb brokered the sale of approximately 28 grams of raw heroin. After obtaining the heroin from Peralta, Webb drove to Parkside to deliver 20 of the 28 grams to Newsom’s residence. Immediately after the delivery, Newsom drove his car to the vicinity of the E.S. residence (the apartment where Newsom and others are believed to have packaged raw heroin for street-level distribution).

63. On February 28, 2015, at approximately 2:11 pm, Newsom called Webb and they discussed the possibility of another heroin deal. Webb stated that “my man” was trying to “get something else [*Peralta is trying to get another supply of heroin*].” A minute later, Webb called Peralta and stated, “Yeah, listed, I might got something for you [*trying to set up another heroin deal*].” Webb added, “I’m at the shop. I got—I got—I got—I got big business right now for you.” Peralta stated that he was busy but that they would speak again at “10 o’clock.”

64. On March 1, 2015, at approximately 10:02 am, Peralta called Webb. Peralta stated, “I told you 10 o’clock” and Webb asked where Peralta was. Peralta stated that he was “here in the house” and Webb promised to call “when I get to the barbershop.” Several minutes later, at approximately 10:10 am, Webb called Newsom. Webb stated, “I got location on Papi and shit. I’m about to get—I had told him 28. But you still wanted 20? [*Webb is planning to buy 28 grams of raw heroin from Peralta, and wanted to confirm that Newsom wanted 20 of those grams*].” Newsom responded affirmatively, and Webb stated, “Aight, we gonna have to break it down [*we will have to split the package of raw heroin*].”

65. On March 1, 2015, at approximately 12:30 pm, Webb called Peralta. Webb asked, “You coming to the barbershop?” Peralta replied that he would be there around “1 o’clock.” Less than twenty minutes later, at approximately 12:49 pm, Newsom called Webb. Webb explained that Peralta was supposed to “come here at 1 o’clock.” The parties discussed how Newsom would pay Webb for the heroin – including whether Webb should drive down to visit Newsom before the sale, or if Webb and Peralta should drive down together to collect the money and complete the transaction.

66. On March 1, 2015, at approximately 12:59 pm, officers observed Webb standing outside the Webb barbershop. Officers observed a male (believed to be Peralta) approach Webb and engage in conversation. The two men then entered the Webb BMW and drove away. Several minutes later, at approximately 1:06 pm, Webb called Newsom and stated that he would be delivering the heroin shortly. Webb stated, “I’m coming down, um, with—with it. Um, but it’s 28 all together [*28 grams of heroin, in a single package*].” In the background, another person – believed to be Peralta – can be heard talking to Webb. Webb then added, “He’s said maybe 30.” In an aside, Webb asked his companion, “You got the scale?” Webb then stated to Newsom, “Oh, he got the scale, so he gonna—he gonna—he gonna—he gonna put it together as soon as

we get there [*The parties will weigh the drugs, so as to ensure Newsom gets the 20 grams of heroin that he ordered*].” Newsom responded, “Oh, aight.” Several minutes later, at approximately 1:12 pm, Webb called Wilson and explained, “I’m taking a ride down [*to Parkside*]—like, I probably will need the car and shit.”

67. On March 1, 2015, at approximately 1:30 pm, Webb called Newsom to say that he and Peralta were approaching Parkside. Webb asked, “So where you want—where do you want me to meet you at?” Newsom responded, “You know, come to my spot [*the Newsom residence*].” Webb replied, “Aight.”

68. On March 1, 2015, at approximately 1:40 pm, officers observed the Webb BMW park on the street in front of the Newsom residence (and directly behind the Newsom Acura). Officers observed Webb seated in the driver’s seat of the vehicle, and another male seated in the passenger seat. Moments later, Newsom approached the Webb BMW and entered the back seat. Approximately two minutes later, Newsom exited the Webb BMW and entered the driver’s side door of the Newsom Acura. The Webb BMW departed and, about five minutes later, the Newsom Acura departed. Officers observed the Newsom Acura enter an apartment complex and park in front of the building that houses the E.S. apartment. Officers observed Newsom and a female exit the vehicle and enter the apartment building.

### **March 6, 2015 Traffic Stop (Newsom, Peralta, Webb)**

69. As discussed below, I believe that on March 6, 2015, Webb obtained approximately 20 grams of raw heroin from Peralta, which Webb attempted to deliver to Newsom in Parkside. During the attempted delivery, however, law enforcement conducted a traffic stop of Webb BMW near the E.S. apartment, and Webb discretely discarded the heroin before officers could search the vehicle. Later that evening and the following morning, Webb and Newsom discussed their efforts to find the heroin that Webb had discarded during the traffic stop.

70. On March 6, 2015, at approximately 9:07 am, Peralta called Webb. Webb asked, “You still got it [*a supply of heroin*]?” Peralta responded affirmatively, and Webb stated, “Okay, cause, um, we gotta take a ride [*delivery to Parkside*]. Um, he [*Newsom*] gonna call me when he ready. If, um, so—I’ll

call you when he ready.” At approximately 10:08 am that day, Wilson called Webb. Wilson asked, “Somebody got something?” Webb replied, “Yeah, Papi [*Peralta*] got that shit [*heroin*] he, um—he call me—he call me today saying he still got it.”

71. On March 6, 2015, at approximately 10:27 am, Newsom called Webb. Webb stated, “About maybe 1 [*in the afternoon*].” Newsom responded, “Aight, but it’s looking like it could happen?” Webb stated, “Yeah, it could happen. I just talked to Papi [*Peralta*]*—he said he got it. . . .*” Webb explained that Wilson was using his car, but that he planned to drive down to Parkside later in the day to make the delivery. Less than five minutes later, at approximately 10:32 am, Webb called Peralta, and they agreed on “1 o’clock.”

72. On March 6, 2015, at approximately 2:06 pm, Webb called Peralta. Webb stated, “Hey, Papi, bring 20 [*grams of raw heroin*] to the barbershop now.” Peralta responded, “Aight.” Webb stated, “Aight, come now.” Ten minutes later, at approximately 2:16 pm, Newsom called Webb, who stated, “I’m in the process. Right now I’m waiting on Papi to come.” Webb added, “Aight, as soon as I get it in my hands and I’m on my way, I’m a hit [*call*] you.” Newsom asked, “Aight, you got the soap [*possibly, a reference to cutting agent*].” Webb responded, “I ain’t get the soap yet.” Newsom asked, “Aight, but you gonna do it for me?” Webb responded, “Yeah.” Around this time, officers observed Peralta depart the Peralta stash house and travel to the Webb barbershop. At approximately 2:22 pm, Webb called Wilson and stated, “You know, Papi just left from me right now [*Peralta just delivered heroin to the Webb barbershop*].”

73. On March 6, 2015, at approximately 3:46 pm, Newsom called Webb. Webb explained that he was waiting for “wifey” (i.e., Wilson) to finish work, after which he would deliver the heroin to Newsom. Webb stated, “I got everything; I’m just waiting to go, baby.” Newsom responded, “Alright.” A short time later, Webb called Newsom and explained that an associate (believed to be Co-Conspirator 0550) would be driving with him.

74. On March 6, 2015, at approximately 5:47 pm, Newsom called Webb, who stated that he was “getting on the highway now.” Around this time, officers observed Webb driving Webb BMW in Newark with another male in the front passenger seat.

75. On March 6, 2015, at approximately 6:26 pm, law enforcement officers conducted a traffic stop of Webb BMW in New Brunswick, New Jersey. Webb was on the phone with Newsom as the stop was occurring. Police sirens can be heard in the background of the call, and Webb stated to Newsom, “They now took me.”

76. On March 6, 2015, at approximately 6:43 pm, Newsom called Webb. Newsom asked, “You okay?” Webb replied, “I don’t know, man. This nigga talking about searching the car and all that shit. He saying something about my motherfucking—um, my registration ain’t coming back and some shit. I don’t know what the fuck this nigga is talking about, man—[OV].” Newsom asked, “Is it good, then?” Webb replied, “Yeah, everything is good on the search.” Webb explained that the officers told him that his license was suspended. Newsom asked if that was true, and Webb replied, “Yeah, but they can’t write me up for my shit being suspended. They can give me a ticket for my shit being suspended.” Newsom responded, “So they can’t—they can’t search the car for that either, though? Could they?” Webb responded, “Nah, my name got a license and shit good.”

77. Officers conducted the traffic stop approximately two blocks from the E.S. apartment, inside the Fulton Street apartment complex. A canine sniff of the vehicle indicated the presence of drugs. During a lawful search of the vehicle, officers found a quantity of Mannitol, a white crystalline substance that is often used by drug traffickers to dilute raw heroin before packaging the mixture for street-level distribution. Webb was temporarily detained by law enforcement, and then released several hours later. Officers impounded the Webb BMW.

78. On March 7, 2015, at approximately 1:03 am, Webb called Newsom. Webb indicated that he was no longer in police custody. Webb then explained that they needed to find the heroin that he discarded at the time of the traffic stop:

Webb	And we gotta get that shit [ <i>discarded heroin</i> ] <i>—</i> that shit outside.
Newsom	Huh?
Webb	And that shit outside.
Newsom	You outside?

Webb I'm saying—that shit outside. [*The drugs are on the street*]

Newsom It is?

Webb Yeah, nigga—what the fuck, we—we threw that shit, it's right there, though!

Newsom Aight. Eh, yo, look—aight, just stay—I'm about to come right now.

79. On March 7, 2015, at approximately 2:21 am, Newsom called Webb. (I am aware that, at that time, law enforcement officers were searching the site of Webb's traffic stop for the discarded heroin.) During the call, Newsom stated, "Yo, they out—that motherfucker searching [*for the discarded heroin*] right now." Webb replied, "Word is born?" Newsom responded, "Word is born to my mother's grave, yo." Newsom described the individuals conducting the search, then added, "But look, though, they further down by the gate. They not by where I think you was by. [*The officers are searching the wrong location.*] Cause, they like—like I said—they, like, further down by that motherfucker. I can't even [U/I]." Webb responded, "Oh, shit. Even if they do find it [*the discarded heroin*], they can't bring nothing on us now. We gone [*Law enforcement will not charge us for drug possession.*]" Newsom responded, "Yeah." Later in the conversation, Webb stated, "They could find whatever they wanna find, nigga, we gone. Hell no. I just hope they don't find that shit."