UNITED STATES DISTRICT COURT **DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	SUPERSEDING
v.	:	CRIMINAL COMPLAINT
	:	
FUQUAN WILLIAMS,	:	Honorable Jessica S. Allen
DWIGHT DIXON,	:	
NAFEE PATTERSON,	:	Mag. No. 23-12244
JABRIEL MASON, and	:	3
DAQWUAN BARKLEY,	:	FILED UNDER SEAL
a/k/a "Pop"	:	

I, Michael Amaturo, 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 with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Michael Amaturo

Michael Amaturo, Special Agent Federal Bureau of Investigation

Special Agent Amaturo attested to this Complaint by telephone pursuant to F.R.C.P. 4.1

November 9, 2023

Date

HONORABLE JESSICA S. ALLEN UNITED STATES MAGISTRATE JUDGE

District of New Jersey at County and State

The Hon. Jessica S. Allen Signature of Judicial Officer

ATTACHMENT A

<u>Count One</u> (Conspiracy to Distribute Heroin, Fentanyl, and Cocaine)

From in or about August 2022 through in or about October 2023, in Essex County, in the District of New Jersey and elsewhere, defendants

FUQUAN WILLIAMS, DWIGHT DIXON, NAFEE PATTERSON, JABRIEL MASON, and DAQWUAN BARKLEY, a/k/a "Pop"

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

<u>Count Two</u> (Possession with Intent to Distribute Fentanyl and Cocaine)

On or about November 2, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NAFEE PATTERSON,

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

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

<u>Count Three</u> (Possession of a Firearm and Ammunition by a Convicted Felon)

On or about November 2, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NAFEE PATTERSON,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely a Diamondback Firearms FS9, 9mm semi-automatic handgun, with an obliterated serial number, equipped with an extended magazine loaded with 11 rounds of 9mm ammunition, and the firearm and ammunition were in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

<u>Count Four</u> (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about November 2, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant

FUQUAN WILLIAMS,

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, conspiracy to distribute and possess with intent to distribute heroin, fentanyl, and cocaine, as charged in Count One of this Criminal Complaint, did knowingly possess a firearm, namely a Glock 19 9mm semi-automatic handgun, bearing serial number UV310, equipped with an extended magazine loaded with 17 rounds of ammunition.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

ATTACHMENT B

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

THE KENT AND BRENNER DTO

1. The defendants are members of a drug trafficking organization that operates an open-air narcotics market in and around the area of Kent Street and Brenner Street in Newark, New Jersey ("Kent and Brenner"). Members of the conspiracy include Fuquan Williams ("WILLIAMS"), Dwight Dixon ("DIXON"), Nafee Patterson ("PATTERSON"), Jabriel Mason ("MASON"), and Dagwuan Barkley a/k/a "Pop," ("BARKLEY") (collectively the "defendants"). During the timeframe relevant to the conspiracy charged in Count One of this Complaint, law enforcement extensively surveilled the area of Kent and Brenner through physical and fixed surveillance; used confidential informants to purchase narcotics, including substances that tested positive for the presence of heroin, fentanyl, and cocaine; reviewed arrests and drug seizures made by local law enforcement in the area of Kent and Brenner; and analyzed telephone records demonstrating interactions between the co-conspirators, among other lawful means of investigation. The investigation has revealed that the Kent and Brenner drug trafficking organization (the "Kent and Brenner DTO") is affiliated with, and the Defendants are members and associates of, the Sex, Money, Murder subset of the Bloods street gang ("SMM").

2. The defendants conspired and agreed with each other and others to distribute large quantities of heroin, fentanyl, and cocaine in the area of Kent and Brenner. Since in or around August 2022, through physical and fixed surveillance, law enforcement has observed members of the Kent and Brenner DTO collectively engage in hundreds of suspected hand-to-hand narcotics transactions. As described in more detail below, during the course of this investigation, law enforcement has used confidential informants to purchase narcotics from members of the DTO on numerous occasions. Through those controlled purchases, law enforcement seized substances that tested positive for the presence of heroin, fentanyl, and cocaine. The investigation has revealed that WILLIAMS supplies the Kent and Brenner DTO with fentanyl-laced heroin and cocaine.

3. The defendants worked together to distribute the heroin, fentanyl,

and cocaine to their customers. Evidence indicating collaboration among the coconspirators includes, for example: telephone records showing, in some instances, hundreds of contacts between co-conspirators; physical interactions between co-conspirators, and seizure of recurring stamps branding the heroin, indicating that members of the Kent and Brenner DTO obtained their narcotics from a common source of supply.

4. The evidence described below demonstrates that the defendants acted in concert to control the area in and around Kent and Brenner and that the drug distribution was coordinated among the conspirators.

LAW ENFORCEMENT SEIZURES OF NARCOTICS AROUND KENT AND BRENNER

A. October 7, 2022 Seizure

5. On or about October 7, 2022, law enforcement observed PATTERSON and MASON interacting with each other and other individuals in a manner consistent with hand-to-hand narcotics transactions in the area of Kent and Brenner. A subsequent search of MASON revealed that he was in possession of approximately 36 glassine envelopes containing suspected fentanyl-laced heroin¹ stamped "Blackberry," approximately 55 plastic jugs containing suspected cocaine, and approximately \$60 in U.S. Currency.

B. June 1, 2023 Seizure

6. On or about June 1, 2023, law enforcement observed WILLIAMS and DIXON interacting with each other in a manner consistent with a hand-to-hand narcotics transaction in the area of Kent and Brenner. DIXON was subsequently arrested by law enforcement and found to be in possession of approximately 50 glassine envelopes of suspected heroin, as well as approximately 20 glass vials of cocaine. The glassine envelopes were marked with the stamp "Lethal Weapon."

C. November 2, 2023 Arrests and Seizures

7. On or about November 2, 2023, during the execution of various search warrants and arrest warrants obtained in connection with this investigation, law enforcement seized additional narcotics and multiple loaded firearms from members of the DTO. Specifically:

¹ During this investigation, as set forth below, law enforcement seized glassine envelopes during controlled purchases bearing the same stamp, "Blackberry," the contents of which tested positive for the presence of heroin and fentanyl.

a. On the morning of November 2, 2023, law enforcement located PATTERSON – an employee of Newark's Department of Public Works – working a shift on a garbage collection truck. PATTERSON was arrested pursuant to the federal warrant issued in connection with this case. A search incident to arrest revealed that PATTERSON was in possession of approximately ten glassine envelopes containing suspected fentanyl bearing the stamp "Napster," approximately twelve plastic jugs containing suspected cocaine, and a Diamondback Firearms FS9 9 millimeter handgun, bearing an obliterated serial number, that was loaded with eleven rounds of 9 millimeter ammunition ("Firearm-1).

- i. Firearm-1 and the ammunition with which it was loaded were manufactured outside the State of New Jersey and thus necessarily traveled in and affected interstate or foreign commerce prior to November 2, 2023.
- ii. Prior to November 2, 2023, PATTERSON knew he had been convicted of at least one felony offense. On or about June 8, 2007, PATTERSON was convicted of narcotics possession in the Superior Court of New Jersey, in violation of N.J.S.A. 2C:35-10, a crime punishable by a term of imprisonment exceeding one year.

b. On or about November 2, 2023, the FBI executed a search warrant on a Ford Crown Victoria used by F. WILLIAMS throughout the duration of the instant investigation to store controlled substances on Kent Street. During the search, law enforcement recovered, among other things, approximately 77 glassine envelopes containing suspected fentanyl-laced heroin, bearing stamps including, but not limited to, "Blackberry" and "Lethal Weapon"; a quantity of suspected cocaine, and a Glock 19 9 millimeter handgun, bearing serial number UV310, equipped with an extended magazine that was loaded with seventeen rounds of ammunition.

CONTROLLED PURCHASES OF HEROIN AND COCAINE

8. In addition to the seizures described above, between September 2022 and October 2023, the FBI used confidential informants to purchase heroin, fentanyl, and cocaine from multiple members of the Kent and Brenner DTO. All of these transactions were conducted in the area of Kent and Brenner, and all of the transactions were recorded with body-worn recording devices. Prior to each controlled purchase, law enforcement officers ensured that the confidential informant making the purchase did not have any unauthorized contraband or currency.

Buy No.	On or about the Week of	Defendant	Substance Purchased	Brand of Heroin
1	9/11/2022	MASON	Heroin / Fentanyl Cocaine	Blackberry
2	9/18/2022	MASON	Heroin / Fentanyl	Blackberry
3	9/25/2022	MASON	Heroin / Fentanyl Cocaine	Blackberry
4	11/13/2022	BARKLEY	Heroin / Fentanyl Cocaine	Bugatti
5	11/27/2022	BARKLEY	Heroin / Fentanyl Cocaine	SRT 8; Pennywise
6	12/4/2022	BARKLEY	Heroin / Fentanyl Cocaine	Copy; Dynasty
7	12/11/2022	BARKLEY	Heroin / Fentanyl Cocaine	Blackberry; Pennywise; Dynasty
8	9/24/2023	DIXON	Heroin / Fentanyl	Napster
9	10/1/2023	PATTERSON	Heroin / Fentanyl Cocaine	Napster

SURVEILLANCE

9. During the timeframe of the conspiracy, law enforcement monitored Kent and Brenner through physical and fixed surveillance. Over the course of the investigation, law enforcement obtained hundreds of hours of video footage depicting the Kent and Brenner DTO engaging in narcotics transactions. The footage captured: the defendants, among other co-conspirators, engaging in hundreds of narcotics transactions in the area of Kent and Brenner; daily interactions between members of the conspiracy; a constant stream of buyers approaching the area for brief interactions; co-conspirators holding, passing, and counting drug proceeds amongst themselves, among other evidence.

10. Based on the narcotics seized during the course of the investigation and the hundreds of hand-to-hand transactions captured on video footage, the investigation revealed that the co-conspirators distributed hundreds of grams of heroin, fentanyl, and cocaine during the conspiracy period.

PHONE CONNECTIONS

11. Many of the defendants provided their phone numbers to the confidential informants to facilitate future drug transactions. Using these telephone numbers and telephone numbers obtained from other sources, records show hundreds of calls between nearly all of the defendants during the conspiracy period. For example, between February 2022 through October 2023:

- WILLIAMS and PATTERSON were in contact approximately 2,773 times.
- WILLIAMS and BARKLEY were in contact approximately 188 times.
- WILLIAMS and DIXON were in contact approximately 420 times.
- WILLIAMS and MASON were in contact approximately 251 times.
- MASON and DIXON were in contact approximately 356 times.
- MASON and PATTERSON were in contact approximately 44 times.
- PATTERSON and DIXON were in contact approximately 99 times.