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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	Honorable André M. Espinosa
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	:	Mag. No. 24-11079
v.	:	
	:	<b><u>CRIMINAL COMPLAINT</u></b>
WILLIAM ELLIOT	:	
	:	

I, Special Agent Nicole Mizrahi, 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 Bureau of Alcohol, Tobacco, Firearms, and Explosives and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

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Nicole Mizrahi, Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

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

March 6, 2024  
Date

at District of New Jersey  
County and State

HONORABLE ANDRÉ M. ESPINOSA

UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about March 6, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**WILLIAM ELLIOT,**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition, namely, a Ruger Model P94 .40 caliber firearm, bearing serial number 34135962, ten 9mm rounds of ammunition, six .40 caliber rounds of ammunition, and twenty rounds of .38 caliber ammunition, and the firearm and ammunition were in and affecting interstate commerce.

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

**COUNT TWO**

(Possession with the Intent to Distribute Fentanyl and Cocaine)

On or about March 6, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**WILLIAM ELLIOT,**

did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (“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), (b)(1)(B), and (b)(1)(C).

**COUNT THREE**

(Possession of a Firearm in Furtherance of a  
Drug Trafficking Crime)

On or about March 6, 2024, in Essex County, in the District of New Jersey  
and elsewhere, the defendant,

**WILLIAM ELLIOT,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a  
court of the United States, namely, the possession with intent to distribute  
controlled substances as charged in Count Two, did knowingly possess a firearm,  
namely, a Ruger Model P94 .40 caliber firearm, bearing serial number 34135962.

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

## **ATTACHMENT B**

I, Nicole Mizrahi, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). 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, 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.

1. For several months, law enforcement has investigated WILLIAM ELLIOT ("ELLIOT") for his distribution of controlled substances. During the investigation, law enforcement has confirmed that ELLIOT utilizes at least two vehicles, a grey Audi (the "Audi") and a black Buick (the "Buick") to transport narcotics and narcotics proceeds for further distribution in the Jersey City area and elsewhere. Law enforcement has also confirmed that ELLIOT uses his residence located in Newark, New Jersey (the "Residence") to store and package narcotics and narcotics proceeds.

2. On or about March 6, 2024, law enforcement responded to the Residence to execute lawful searches of the Residence, the Audi, and the Buick.

3. Prior to the execution of the search of the Residence, law enforcement observed ELLIOT exit the Residence and walk toward the Audi.

4. Before ELLIOT could enter the Audi, law enforcement stopped ELLIOT and lawfully executed the search of the Audi. During the search of the Audi's trunk, law enforcement recovered approximately fifteen grams of suspected fentanyl labeled "GMA" and "SRT" packaged for distribution, ten 9mm rounds of Lugar ammunition, a silver digital scale, and packaging materials consistent with narcotics packaging. Moreover, a search of the center console of the Audi yielded approximately two grams of suspected fentanyl labeled "GMA" and "SRT".

5. After the search of the Audi was completed, law enforcement lawfully executed the search of the Residence. During the search of the main bedroom of the Residence, law enforcement recovered ELLIOT's phone and wallet with ELLIOT's New Jersey driver's license on a dresser located next to a digital scale and packaging materials consistent with narcotics packaging.

6. During a search of the closet located in the main bedroom, law enforcement recovered a bag on the closet floor that contained approximately thirty grams of suspected fentanyl labeled "GMA" and "SRT". Law enforcement also recovered on the closet floor next to the bag of suspected fentanyl, a box

containing a Ruger Model P94 .40 caliber firearm, bearing serial number 34135962 (the “Firearm”), a magazine loaded with 6 rounds of .40 caliber ammunition, and twenty rounds of .38 caliber ammunition.

7. Further, law enforcement recovered approximately \$6,500 of United States currency in various denominations, consistent with narcotics proceeds, scattered throughout the main bedroom.

8. After the search of the Residence was completed, law enforcement lawfully executed the search of the Buick. During the search of the Buick’s trunk, law enforcement recovered a plastic bag containing approximately fifteen grams of suspected fentanyl labeled “GMA” and “SRT” packaged for distribution, approximately 350 grams of suspected cocaine packaged for distribution, and a digital scale.

9. The Firearm and ammunition recovered during a search of the Residence and the Audi were manufactured outside of the State of New Jersey, and thus moved in and affected interstate commerce prior to March 6, 2024.

10. Prior to March 6, 2024, ELLIOT had at least one felony conviction in the Superior Court of New Jersey, Hudson County, including a conviction on or about February 15, 2002, for manufacturing, distributing, and dispensing controlled substances, in violation of N.J.S.A. 2C:35-5B(3), a crime punishable by a term of imprisonment exceeding one year. As a result, ELLIOT was sentenced to five years’ imprisonment.

11. In addition, on or about June 15, 2005 ELLIOT was convicted of conspiring to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(5), for which he was sentenced to ten years’ imprisonment.