
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 : :
 : v. Hon. Michael A. Hammer
 : :
KHALIF IRVING : Mag. No. 25-10032
a/k/a “Kah Kah” : :
 : :

I, Michael Shore, 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 Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

/s/ Michael Shore
Task Force Officer Michael Shore
Bureau of Alcohol, Tobacco, Firearms &
Explosives

Task Force Officer Michael Shore attested to this Complaint by telephone pursuant to Rule 4.1(b)(2)(A) of the Federal Rules of Criminal Procedure on January 24, 2025.

Honorable Michael A. Hammer
United States Magistrate Judge

/s/ Michael A. Hammer
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

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

On or about January 23, 2025, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KHALIF IRVING,
a/k/a “Kah Kah,”**

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely, a Smith & Wesson 9 millimeter handgun bearing serial number FYX3789, loaded with nine rounds of 9 millimeter 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 Intent to Distribute Fentanyl and Cocaine)

On or about January 23, 2025, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KHALIF IRVING,
a/k/a “Kah Kah,”**

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, 841(a)(1) and (b)(1)(C).

COUNT THREE

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

On or about January 23, 2025, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KHALIF IRVING,
a/k/a “Kah Kah,”**

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, possession with intent to distribute fentanyl and cocaine, as charged in Count Two of this criminal complaint, did knowingly possess a firearm, namely, a Smith & Wesson 9 millimeter handgun bearing serial number FYX3789, loaded with nine rounds of 9 millimeter ammunition.

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

ATTACHMENT B

I, Michael Shore, am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms & Explosives. 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 other 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. Law enforcement is currently investigating narcotics and firearms offenses in and around the Janice Cromer Village Apartments in Newark, New Jersey.

2. In connection with this investigation, law enforcement has been monitoring an Instagram profile bearing the display name "known_opp," believed to be used and controlled by IRVING (the "Irving Account"). On or about January 17, 2025, law enforcement observed an Instagram live video posted on the Irving Account depicting IRVING holding a phone with the camera pointed up at his face. IRVING is walking outside. He puts the phone down and engages in a discussion about the prices of suspected heroin and fentanyl he is selling bearing the stamps "Xbox" and "Lean Back."

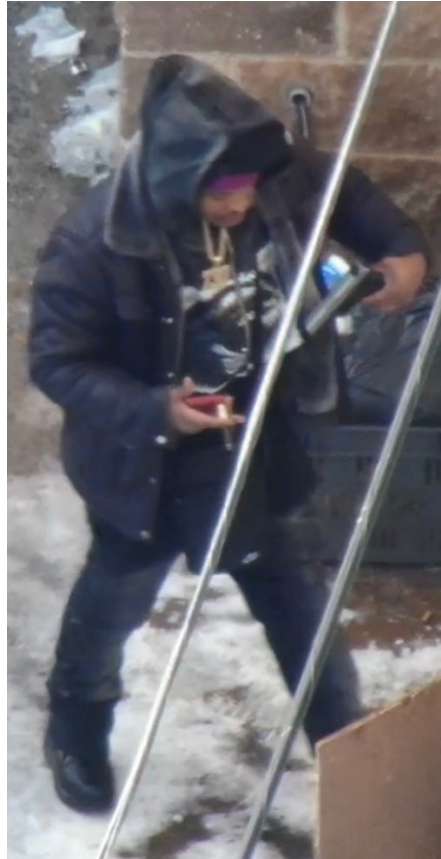
3. In reviewing the Irving Account, law enforcement also observed a photo posted to the account which depicts an individual believed to be IRVING concealing what appears to be a firearm in his waistband. The suspected firearm is covered by a flame emoji, and Irving's face is covered with a devil face emoji:



The Irving Account posted another photo to its story that depicts IRVING – this time with his face clearly visible – wearing the same outfit with the same background:



4. On or about January 23, 2025, while conducting aerial surveillance, law enforcement observed IRVING remove what appeared to be a black and silver firearm from his person and place it into a utility box affixed to the side of a building at the Janice Cromer Village apartments.



5. Within approximately ten minutes of observing IRVING stow the firearm in the utility box, law enforcement arrived at the scene and recovered the firearm – namely, a Smith & Wesson 9 millimeter handgun, bearing serial number FYX3789, loaded with nine rounds of ammunition – from the utility box.

6. Around the same time, law enforcement observed IRVING sitting in the passenger seat of a vehicle parked on Broad Street Newark, New Jersey and arrested him. During a search incident to arrest, law enforcement recovered approximately 23 glassine envelopes containing suspected fentanyl bearing a stamp of “Xbox” in green ink, approximately 31 glassine envelopes containing suspected fentanyl bearing a stamp of “Lean Back” in blue ink – the same stamps IRVING advertised for sale days early through his Instagram account – and a

rock-like substance containing suspected cocaine base from IRVING's pockets and inside a crossbody bag he was wearing.¹

7. The Firearm and Ammunition were manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to IRVING's possession of them in New Jersey on or about January 23, 2025.

8. On or about March 15, 2019, IRVING was convicted in New Jersey Superior Court, Middlesex County, for an aggravated assault in violation of N.J.S.A. 2C:12-1B(5)(A), which is a crime punishable by imprisonment for more than one year. IRVING was sentenced to 3 years' imprisonment on that charge.

¹ The substances recovered were: (1) a white powdery substance consistent, based on training and experience of the recovering officers, with fentanyl packaged for distribution; and (2) a rock-like substance consistent with cocaine base.