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

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UNITED STATES OF AMERICA

:

**CRIMINAL COMPLAINT**

:

v.

:

:

ISAIAH WEST,

:

a/k/a, "Snoop,"

:

a/k/a, "Bandz,"

:

Honorable José R. Almonte

JAMANTAY GAINES,

:

a/k/a, "D-Rose,"

:

Mag. No. 25-16161

CURTIS FELDER,

:

a/k/a, "Cee Grizzley,"

:

a/k/a, "Curt,"

:

DORIAN GARRETT,

:

a/k/a, "Nero,"

:

WILLIAM WASHINGTON,

:

a/k/a, "OnSight,"

:

AAMIR THOMAS,

:

a/k/a, "Mir,"

:

NAREEF FRIMPONG,

:

a/k/a, "Huncho,"

:

REAKWON HARVEY,

:

a/k/a "ReakyG,"

:

PEDRO TORRES,

:

NAJON PETTIFORD,

:

a/k/a, "Na,"

:

DESMAR RIVERS,

:

a/k/a, "Pacman,"

:

STEPHON TURNER,

:

a/k/a "Bread Winner,"

:

TYLER THORNTON,

:

a/k/a, "Wavy G"

:

CHRISTOPHER MALDONADO,

:

a/k/a, "G Chris,"

:

KEIYAN GOLDEN,

:

a/k/a, "Kevin Council,"

:

CORNELL BELL,

:

SERGE RODRIGUEZ,

:

GERARD CRAWFORD

:

a/k/a, "Jason Reed," and

:

ALFRED REAVES

:

I, Taeketra U. Haynes, 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 & Explosives (“ATF”), and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

*/s/ Taeketra U. Haynes*

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Taeketra U. Haynes  
Special Agent  
Bureau of Alcohol, Tobacco  
Firearms & Explosives

Special Agent Haynes attested to this Complaint  
by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A) on this 2nd date of  
September 2025, in the District of New Jersey.

*/s/ José R. Almonte*

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Honorable José R. Almonte  
United States Magistrate Judge

**ATTACHMENT A**

**Count One**  
**(Conspiracy to Distribute and Possess with the Intent to  
Distribute Controlled Substances)**

From at least as early as in or around April 2025 through in or around  
September 2025, in Hudson County, in the District of New Jersey and  
elsewhere, defendants

ISAIAH WEST,  
a/k/a, "Snoop,"  
a/k/a, "Bandz,"  
JAMANTAY GAINES,  
a/k/a, "D-Rose,"  
CURTIS FELDER,  
a/k/a, "Cee Grizzley,"  
a/k/a, "Curt,"  
DORIAN GARRETT,  
a/k/a, "Nero,"  
WILLIAM WASHINGTON,  
a/k/a, "OnSight,"  
AAMIR THOMAS,  
a/k/a, "Mir,"  
NAREEF FRIMPONG,  
a/k/a, "Huncho,"  
REAKWON HARVEY,  
a/k/a "ReakyG,"  
PEDRO TORRES,  
NAJON PETTIFORD,  
a/k/a, "Na,"  
DESMAR RIVERS,  
a/k/a, "Pacman,"  
STEPHON TURNER,  
a/k/a "Bread Winner,"  
TYLER THORNTON,  
a/k/a, "Wavy G,"  
CHRISTOPHER MALDONADO,  
a/k/a, "G Chris,"  
KEIYAN GOLDEN,  
a/k/a, "Kevin Council,"  
CORNELL BELL,  
SERGE RODRIGUEZ,  
GERARD CRAWFORD,  
a/k/a, "Jason Reed," and  
ALFRED REAVES

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

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

## **ATTACHMENT B**

I, Taeketra U. Haynes, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, & 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, lawfully recorded communications, 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 SaLaf DTO**

1. Since at least in or around April 2025, the ATF, along with other law enforcement agencies, including the Hudson County Prosecutor’s Office (“HCPO”), the Jersey City Police Department (“JCPD”), and the Drug Enforcement Administration (“DEA”), have been investigating members and associates of the SaLaf gang (“SaLaf” or the “DTO”), a neighborhood-based street gang involved in the distribution of controlled substances in and around Jersey City, New Jersey. The DTO primarily operates in and around the area of Salem Lafayette Apartments—an affordable housing complex in Jersey City, New Jersey. Members and associates of the DTO include Isaiah West, a/k/a “Snoop,” a/k/a “Bandz” (“WEST”), Jamantay Gaines, a/k/a, “D-Rose” (“GAINES”), Curtis , a/k/a “Cee Grizzley,” a/k/a, “Curt” (“FELDER”), Dorian Garrett, a/k/a “Nero” (“GARRETT”), William Washington, a/k/a “OnSight” (“WASHINGTON”), Aamir Thomas, a/k/a “Mir” (“THOMAS”), Nareef Frimpong, a/k/a “Huncho” (“FRIMPONG”), Reakwon Harvey, a/k/a “ReakyG” (“HARVEY”), Pedro Torres (“TORRES”), Najon Pettiford, a/k/a “Na” (“PETTIFORD”), Desmar Rivers, a/k/a “Pacman” (“RIVERS”), Stephon Turner, a/k/a “Bread Winner” (“TURNER”), Tyler Thornton a/k/a, “Wavy G” (“THORNTON”), Christopher Maldonado, a/k/a “G Chris” (“MALDONADO”), Keiyan Golden, a/k/a “Kevin Council” (“GOLDEN”), Cornell Bell (“BELL”), Serge Rodriguez (“RODRIGUEZ”), Gerard Crawford, a/k/a “Jason Reed” (“CRAWFORD”), and Alfred Reaves (“REAVES”) (collectively, the “Defendants”).

2. During the investigation, law enforcement obtained multiple Court Orders authorizing the interception of wire and electronic communications occurring over multiple cellular telephone devices used in furtherance of the DTO’s activities. As set forth throughout this Criminal Complaint, these wiretaps, in conjunction with mobile and fixed surveillance and controlled narcotics purchases, among other investigative techniques, have revealed the operational structure and inner workings of the DTO and the method and means by which it carried out its narcotics-trafficking conspiracy. Law enforcement

also observed certain members of the DTO's social media profiles including WEST's, which revealed that they actively advertise the controlled substances that they have for sale to the public.

3. The Defendants worked together to distribute fentanyl-laced heroin, cocaine base, prescription narcotics, and suspected phencyclidine ("PCP") to their customers. Evidence indicating collaboration among the co-conspirators includes, for example: telephone records and intercepted communications generally showing frequent contact between co-conspirators; physical interactions between co-conspirators, during which members of the DTO collaborated in order to fill narcotics orders from customers, including, in some cases, confidential sources; and the seizure of recurring stamps<sup>1</sup> branding the narcotics, indicating that members of the DTO obtained their narcotics from a common source of supply.

4. Often, multiple members and associates of SaLaf work together to distribute narcotics. For example, one member may arrange for the sale, and then send a second member and associate to provide the controlled substances to the buyer. Additionally, SaLaf gang members sometimes work as "lookouts" for other gang members, to ensure that law enforcement is not in the vicinity while other members distribute controlled substances, while some others work as "runners" to deliver narcotics for tother gang members. Further, some members of the DTO supply others with controlled substances. Specifically, at all times relevant to this Complaint, BELL, RODRIGUEZ, CRAWFORD, and REAVES, supplied other members of the DTO with controlled substances.

### **Controlled Purchases From the DTO**

5. Between in or around April 2025 and in or around August 2025, law enforcement used confidential sources<sup>2</sup> to purchase fentanyl-laced heroin, cocaine base, prescription narcotics, and suspected PCP from members of the DTO. These transactions were conducted around Salem Lafayette Apartments or with individuals law enforcement observed engaging in suspected narcotics activity on a regular basis in the area of Salem Lafayette Apartments. Prior to each controlled purchase involving a confidential source, law enforcement officers ensured that the confidential source making the purchase did not have any unauthorized contraband or currency.

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<sup>1</sup> Drug dealers use stamps, usually containing a word, phrase, or image, to brand heroin/fentanyl packaging materials. Stamps are intended to allow drug users to track the origin and quality of a product so that they can find and re-purchase that product.

<sup>2</sup> These confidential sources have a history of reliability and credibility and are cooperating with law enforcement in exchange for financial compensation.

<b>Date of Transaction</b>	<b>Target Subject(s) Involved in Transaction</b>	<b>Contraband Purchased<sup>3</sup></b>
4/30/2025	THOMAS	Crack cocaine
5/8/2025	GAINES	Crack cocaine
5/8/2025	WEST FRIMPONG	Suspected heroin and crack cocaine
5/27/2025	WEST	Crack cocaine
5/27/2025	FELDER	Fentanyl
6/6/2025	GAINES HARVEY	Fentanyl and cocaine
6/9/2025	GAINES	Cocaine
6/13/2025	GAINES	Suspected crack cocaine
6/16/2025	GAINES	Crack cocaine
6/23/2025	GAINES HARVEY	Suspected crack cocaine
6/24/2025	WEST	Suspected heroin
7/1/2025	WEST	Suspected heroin and suspected crack cocaine
7/24/2025	FELDER	Suspected heroin
7/24/2025	FELDER GARRETT HARVEY	Suspected heroin
7/29/2025	GARRETT	Suspected heroin
7/29/2025	FELDER	Suspected heroin
7/31/2025	WEST	Suspected Oxycodone
8/7/2025	GARRETT	Suspected heroin
8/7/2025	WASHINGTON	Suspected PCP
8/14/2025	GARRETT GOLDEN	Suspected heroin and suspected crack cocaine
8/19/2025	GARRETT	Suspected heroin and suspected crack cocaine

### **The DTO's Distribution of Controlled Substances in The SaLaf Area**

6. During the timeframe of the conspiracy, law enforcement heavily surveilled the area surrounding Salem Lafayette Apartments, including the courtyard area between the buildings. The territory of SaLaf, which the gang refers to as “Sunnyside,” is located in the area of Bramhall Avenue to Virginia Avenue between Ocean Avenue and Martin Luther King Drive Over the course of

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<sup>3</sup> A “suspected” substance is the substance that was intended in a controlled purchase by a confidential source that is still pending confirmation through laboratory analysis.

the investigation, law enforcement obtained hours of video footage depicting members of the DTO engaging in narcotics transactions. The footage captured, among other evidence, dozens of narcotics transactions involving the defendants, daily interactions between members of the conspiracy, a frequent stream of buyers approaching the area for brief interactions that are consistent with drug sales, and co-conspirators holding, passing, and counting drug proceeds amongst themselves. For example:

- a. On or about July 23, 2025, law enforcement observed an unidentified man (“Individual-1”) approach RIVERS in the area of Martin Luther King Jr. Drive. Individual-1 handed RIVERS money and a cigarette, which RIVERS appeared to dip into a substance and then handed back to Individual-1. Based on my training and experience, I believe that this substance was PCP.
- b. On or about August 3, 2025, law enforcement observed TORRES conduct suspected hand-to-hand narcotics sales in the Salem Lafayette Apartments courtyard.
- c. On or about August 6, 2025, law enforcement observed TURNER conduct suspected hand-to-hand narcotics sales in the Salem Lafayette Apartments courtyard.

7. Law enforcement and confidential sources have also observed members of the DTO work together to sell narcotics. For example:

- a. On or about June 16, 2025, TORRES and GAINES worked together to sell a confidential source (“CS-1”) suspected crack cocaine. At approximately 11:40 a.m., CS-1 texted GAINES to meet up to purchase narcotics. At approximately 11:45 a.m., surveillance cameras captured GAINES leave his home and walk to Martin Luther King Drive and Oak Street where he met with TORRES and other individuals. TORRES had a scooter with a black drawstring backpack hanging from it. GAINES then called CS-1 and explained that he would come to CS-1 via scooter. After GAINES called CS-1, surveillance cameras captured GAINES take the scooter from TORRES and open the drawstring backpack so TORRES could drop an unknown item, suspected to be narcotics, into the backpack. GAINES then closed the backpack and rode to meet CS-1 near the intersection of Union Street and Ocean Avenue, just west of the Salem Lafayette Apartments. Upon arriving at CS-1’s location, GAINES pulled the scooter between two parked cars, retrieved the suspected drugs out of the backpack, and handed four jugs of suspected crack cocaine to CS-1 in exchange for \$40. Surveillance units then observed GAINES return to the area of Martin Luther King Drive and Oak Street and give the scooter back to TORRES.



- b. On or about July 24, 2025, FELDER, GARRETT, and HARVEY worked together to sell CS-1 suspected heroin. CS-1 approached FELDER in the Salem Lafayette Apartment complex and inquired about purchasing “paper,” which I know, from my training and experience, to refer to heroin. FELDER directed CS-1 to GARRETT and HARVEY, who were both standing with FELDER. GARRETT and HARVEY walked CS-1 into the Salem Lafayette Apartment courtyard, where GARRETT and HARVEY each handed CS-1 four envelopes of heroin in exchange for \$40.
- c. On or about August 14, 2025, surveillance units observed an unidentified man (“Individual-2”) approach WEST. WEST directed Individual-2 to PETTIFORD, who walked with Individual-2 to a Dodge Charger known to be operated by PETTIFORD throughout the investigation. PETTIFORD and Individual-2 entered the car, and Individual-2 provided PETTIFORD with a cigarette. PETTIFORD proceeded to dip the cigarette in a bottle and hand it back to Individual-2. Based on my training and experience, I believe that this substance was PCP.

### **West’s Use of Other DTO Members to Complete Drug Transactions**

8. The investigation has revealed that WEST, GAINES, and FELDER often receive telephone calls from individuals seeking to purchase narcotics. At certain times relevant to the Complaint, WEST, GAINES, and FELDER completed the transactions themselves.

9. In other instances, WEST asked other members of the DTO to deliver narcotics to customers who had called WEST to place an order. In those situations, WEST generally coordinated the transaction by phone while directing the other members of the DTO to physically complete the drug sale.

10. For example, on or about July 24, 2025, WEST had a series of phone calls with PETTIFORD and another individual known to law enforcement to have purchased narcotics from WEST on numerous occasions throughout the investigation (“Individual-3”). At approximately 4:29 p.m., WEST and Individual-3 had a phone call in which Individual-3 asked, “to grab another 10, if you were around.” WEST replied, “Alright,” and “just give me like, give me a little minute. . . . I’m about to send somebody.” At approximately 5:08 p.m., Individual-3 called WEST and asked, “So was he leaving now, you said?” WEST responded, “Nah, he about to come back from the store, and then jump in his car and leave.” Approximately one minute later, Individual-3 called WEST and told WEST, “I’m grabbing 11.” WEST replied, “A’ight.” Based on the investigation and my training and experience, I believe “10” and “11” to refer to quantities of prescription pills Individual-3 was asking to purchase from WEST.

11. At approximately 5:54 p.m., Individual-3 called WEST, and Individual-3 and WEST had the following exchange:

WEST: He been left. He should be over there.

Individual-3: Nah, nah, I was just, bro, I was just gonna ask if he's outside cause there's someone in front, I didn't know if it's your friend.

WEST: Huh?

Individual-3: I was just asking you if he's outside 'cause there's somebody in front of my crib, I don't know if that's him.

WEST: Yeah, he got, is it a black car?

Individual-3: Uh, yeah. It's like a bigger car.

WEST: Yeah, that's my friend outside. [Unintelligible] Charger.

Individual-3: Um, Charger?

WEST: Dodge.

Individual-3: Don't think so. Hold on. Let me see.

WEST: It's an all black.

Individual-3: It's...

WEST: [Aside: Damn, that shit cool shit.]

Individual-3: Nah, actually it wasn't him. The car just left.

WEST: Aight, he should be there, though. In like probably, like, like 2 minutes. 'Cause he left like...

Individual-3: Okay. Okay, okay, alright.

WEST: Aight.

12. At approximately 6:39 p.m., Individual-3 called WEST again, and WEST explained, "I literally just got off the phone with him. Stay on the phone." At approximately 6:40 p.m., Individual-3, PETTIFORD, and WEST had the following three-way call:

PETTIFORD: Yo.

WEST: Hello.

PETTIFORD: Yo.

WEST: Yo, just tell her how far you're away, man.

PETTIFORD: Huh?

WEST: Tell her how far you're away.

PETTIFORD: I'm 15.

Individual-3: Okay.

PETTIFORD: Aight.

Individual-3: Aight.

13. At approximately 7:02 p.m., PETTIFORD called WEST. WEST explained, "I'm telling her right now," and PETTIFORD replied, "Aight, tell her what car I'm in and everything . . . Tell her what car, like text her." WEST confirmed, "Aight. She's coming." Based upon the investigation and my training and experience, I understand that PETTIFORD was the individual who was delivering the narcotics to Individual-3 and that once PETTIFORD arrived outside Individual-3's home, WEST texted Individual-3 to alert her to PETTIFORD's presence and the car he was driving.

14. On or about August 4, 2025, THORNTON called WEST at approximately 10:50 a.m., and WEST said, "you said you were gonna get rid of them, help me get rid of them shits." THORNTON confirmed, "Yeah . . . Right now I'm about to go uh, I'm about to go down Marion<sup>4</sup> real quick, I mean if you want me to come grab them right now I'll come grab them, while you sleeping and shit. . . . Aight I'm about to come right now then." WEST confirmed, "A'right." At approximately 11:06 a.m., THORNTON called WEST and explained, "I'm outside." WEST confirmed, "I'm coming downstairs." THORNTON called WEST again at approximately 11:14 a.m., and WEST explained, "Coming down right now." THORNTON responded, "A'right come on 'cause I got two people that just hit me." Based upon the investigation and my training and experience, I understand that WEST was asking for THORNTON to help him sell narcotics when he said "you said you were gonna get rid of them, help me get rid of them shits." As illustrated by the subsequent calls, THORNTON then went to WEST's

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4 Marion Gardens Housing Complex is another public housing complex in Jersey City, New Jersey, with which a rival neighborhood street gang to SaLaf associates.

residence, which I understand to have been to pick up the narcotics, and by saying, "I got two people that just hit me," was telling WEST that he had two customers looking to purchase narcotics.

15. On or about August 10, 2025, WEST had a series of calls with THORNTON and Individual-3. At approximately 7:55 p.m., Individual-3 called WEST and said, "I think I'mma grab 3 more . . . If you could pull up." WEST responded, "You not right here. You gonna have to give me a minute." Individual-3 responded, "Yeah. I'm not rushing you. . . . But just let me know when you start heading out. That way I know when to expect you." WEST confirmed, "A'ight." Based upon the investigation and my training and experience, I understand that Individual-3 was ordering "3" prescription pills and by asking WEST to "pull up," was asking WEST to arrange for the pills to be delivered to her. At approximately 8:53 p.m., THORNTON called WEST. During this call, THORNTON explained that he was going to Bloomfield, and WEST asked THORNTON if he felt like going somewhere for him. THORNTON responded no, and WEST said THORNTON was "about to go that way. Just give it to me, the money when you come back." THORNTON explained that he was "staying over there," and WEST responded, "you gonna give me the money tomorrow.

16. At approximately, 9:12 p.m., WEST called Individual-3, and WEST and Individual-3 had the following exchange:

Individual-3: Yo. What's up?

WEST: Yo. You got cash or Zelle?

Individual-3: No, Zelle.

WEST: Aight. Um... aight, send it. My man about to come.

Individual-3: Okay, I got you. How far is he?

WEST: He's... he should be 25 minutes away.

Individual-3: Okay. So I'm sending it to you, your number or?

WEST: My number.

Individual-3: Alright. I got you, when you pull up, like usual.

WEST: How many, 3?

Individual-3: Yeah, 3.

WEST: Aight.

Individual-3: Alright.

17. Based on my training and experience, I understand that WEST was directing Individual-3 to send him a payment via Zelle for the narcotics and that WEST was sending another individual ("my man," i.e., THORNTON) to deliver them to Individual-3 in approximately 25 minutes.

18. At approximately 9:55 p.m., THORNTON called WEST and said, "Tell her to come outside." Also, at approximately 9:55 p.m., WEST called Individual-3, and WEST and Individual-3 had the following exchange:

Individual-3: Yo.

WEST: Yeah. He's outside

Individual-3: All right. Bye. I see him. Bye.

WEST: Huh!

Individual-3: Yeah. I'm coming out. Imma send it to you. Bye.

WEST: A'ight.

19. At approximately 9:58 p.m., Individual-3 called WEST, and WEST and Individual-3 had the following exchange:

Individual-3: Yo, I'm outside.

WEST: Hello.

Individual-3: Nobody's here. What car is he in?

WEST: He in a Honda.

Individual-3: Nobody's here.

WEST: He probably in front, check the front, the back, check around.

Individual-3: I'm literally standing the front and went to the side...

WEST: Aight, stay out, just stay right there, then he should be coming. He told me that he on the way.

Individual-3: A white Honda?

WEST: The Honda, gray Honda. He should be right there.

Individual-3: I'm outside.

20. At approximately 10:00 p.m., surveillance units observed Individual-3 exit her residence and enter the passenger door of a gray Honda, and then exit the gray Honda and return to her residence approximately one minute later. Thus, based upon the investigation and my training and experience, I understand that THORNTON was the individual who was delivering the narcotics to Individual-3 on behalf of WEST.

21. Additionally, on or about August 2, 2025, WEST had a series of calls with MALDONADO, in which WEST directed MALDONADO to package and sell narcotics on his behalf. Specifically, at approximately 11:15 p.m., MALDONADO called WEST and said, "Ain't no scale in here bro." WEST responded, "Yes it is, it's in the bag, in my weed bag in the back." At approximately 11:19 p.m., MALDONADO called WEST again, and they had the following conversation:

MALDONADO: Yo, where you go, yo?

WEST: [Unintelligible] You did it?

MALDONADO: Nah bro, I need it a- another piece bro.

WEST: That's what I told you to get that, but you ain't listen...

[Voices overlap]

MALDONADO: I know, I said you said that, I said you said that

[Unintelligible].

WEST: How you never listen bro? Making everything so hard to just listen.

[Voices overlap]

MALDONADO: I said you said that to grab the whole thing bro, I knew you gonna say that bro. But bro its one point, I thought it was gonna be, it's 1 point 4.

WEST: It's 1 point what though, one point what?

MALDONADO: One point 4. I thought it was gonna be two grams bro.

WEST: A'ight bro just give it to him bro.

MALDONADO: Just give it to him?

WEST: Yeah bro.

MALDONADO: A'ight bet Imma put that in two separate uh, two separate shits, like, like they, they both a gram.

WEST: Bro just, nah just take, take uh a lil some outta the, or get like... Put a nick with that.

MALDONADO: Put a nick with it?

WEST: Yeah.

MALDONADO: That's what I'm saying and do it in two separate bags though like they both a gram right?

WEST: No throw it all on one.

MALDONADO: Oh throw it all in one? Oh a'ight, like there two grams in one?

WEST: Yeah.

MALDONADO: A'ight bet, ayo he pulling on Jewett you so...

WEST: A'ight,im about to tell him right now.

MALDONADO: A'ight, I'm about to say Jewett and where?

WEST: Jewett and Bergen.

MALDONADO: Jewett and Bergen? A'ight call him right now, we gonna come up. 'Cause Imma call you when we outside, we coming up, we pulled off right now so the time be on [Unintelligible].

WEST: I'm about to tell him.

MALDONADO: A'ight.

22. Based on the content of these conversations, my training and experience, and the results of the investigation to date, I understand that MALDONADO called WEST as he was weighing narcotics because the substance, which I believe to be crack cocaine, was only totaling 1.4 grams versus 2 grams. WEST told MALDONADO to “put a nick with it,” which I understand to refer to .05 grams of crack cocaine, and to package everything together and then meet the customer on Jewett and Bergen in Jersey City.

23. At approximately 11:25 p.m., MALDONADO called WEST and asked, “He outside?” WEST responded, “Yeah,” and MALDONADO explained, “We on the corner, tell him we in the corner of Jewett and Bergen by the um, by the bike.” WEST directed, “Beep the horn. Been the horn. beep the . . . stay on the phone.” Approximately one minute later, MALDONADO called WEST again and asked, “Ayo he white?” WEST responded, “Yeah he big as hell bro, he’s gonna slide into the car.” At approximately 11:27 p.m., MALDONADO called WEST and explained, “he said you owe him five so he owe you five now.” Based on the content of these conversations, my training and experience, and the results of the investigation to date, I understand that WEST was describing the customer to MALDONADO and that MALDONADO then made the sale, explaining that WEST owed the customer “five,” meaning \$5.

### **Coordination Among DTO Members**

24. The investigation has also shown that the Defendants collaborate to source narcotics, replenish their supply, set prices, and broker drug sales with third parties. For example, on or about July 30, 2025, at approximately 7:15 p.m., TURNER called WEST to ask where WEST was. TURNER asked, “You still got 30s?” to which WEST responded, “Why, what happened? Yeah. TURNER replied, “Aight, bet. Just hit me when you get up here.” Based on my training and experience, I understand that TURNER was asking for 30 milligram prescription narcotics, which WEST has sold throughout this investigation, and WEST confirmed that he had the pills. At approximately 7:33 p.m., surveillance units observed TURNER approach WEST and WEST hand pills to TURNER. Surveillance units previously observed TURNER engage in suspected narcotics deals on previous occasions, including on or about July 19, 2025, and July 23, 2025. Thus, based on my training and experience, I believe that WEST has been supplying narcotics to TURNER, which he is then selling to other individuals.

25. Additionally, on or about August 18, 2025, WEST and RIVERS had a series of calls regarding the pricing of narcotics and brokering a drug sale. At approximately 5:35 p.m., RIVERS called WEST, and they had the following conversation:

WEST: Hello.



RIVERS: Hey yo, I'm on the bar side right [Phonetic]? Yo, [Stammers] the purple right, how much do you be charging online yo?

WEST: It depends. Like 16, 880, I mean it depends. [Pause] It depends on what kind it is too.

RIVERS: Oh, codeine, promethazine. I could tax.

WEST: Huh?

RIVERS: I can tax all 4 right?

WEST: Yeah.

RIVERS: But the average probably like, like one something right?

WEST: That n\*\*\*\* ain't gonna buy for...

[Voices Overlap ]

RIVERS: I know. Probably, probably sell it at like 80 you heard?

WEST: Yeah. What kind is it? How many lines...

[Voices Overlap ]

RIVERS: I'm about to FaceTime you. Hold on, hold on, I'm about to FaceTime you.

26. Based on the content of these conversations, my training and experience, and the results of the investigation to date, I understand that RIVERS was asking WEST how much to charge for codeine and promethazine. WEST indicated that \$100 would be too high, and RIVERS suggested selling the drugs for \$80.

27. At approximately 8:34 p.m. the same evening, RIVERS called WEST and explained, "he wants to meet you by the playground." WEST explained, "Bro, no, tell him to come to the Ave, bro." At approximately 8:36 p.m., RIVERS called WEST and explained, "I'm on the Ave. . . . Oh he calling me now." At approximately 8:37 p.m., WEST called RIVERS, and RIVERS said, "Hurry up Pop, hurry up. . . . He right here. . . . He right here like, like, come to the gate with me. He walking like, he won't, he won't come to the gate." Based on the content of these conversations, my training and experience, and the results of the investigation to date, I understand that RIVERS had a customer looking to meet WEST and that RIVERS intended to introduce the individual to WEST directly.

28. Additionally, the investigation has further revealed that the heroin and/or fentanyl that the DTO purchases and sells is almost always stamped or labeled in colored ink, which act as brand names for the drugs. These “stamps” or brand names allow the dealers to differentiate and market batches of heroin and/or fentanyl. At various times relevant to this Criminal Complaint, multiple members of the DTO sold glassine envelopes containing heroin and/or fentanyl that were stamped “American Gangster” and “Sorry Charlie,” among other stamps. For example:

- a. On or about June 24, 2025, and July 1, 2025, WEST sold a confidential source (“CS-2”) two bundles of suspected heroin and/or fentanyl stamped “American Gangster” in red ink. On or about July 24, FELDER sold CS-2 two bundles of suspected heroin and/or fentanyl with the same “American Gangster” stamp.
- b. On or about July 29, 2025, GARRETT sold CS-1 suspected heroin and/or fentanyl stamped “Sorry Charlie” with an image of an orange bear wearing classes. This sale took place in a Land Rover known to be operated by GARRETT throughout the investigation. When CS-1 entered the vehicle, GARRETT explained that he was about to “pick it up,” placed a call to an unidentified individual and asked the individual to “bring me two.” GARRETT asked CS-1 if CS-1 was “f\*\*\*in with that ‘Sorry Charlie’ . . . I got a whole bunch of that shit.” An unidentified person delivered GARRETT the suspected heroin and/or fentanyl stamped “Sorry Charlie;” GARRETT then sold to CS-1 approximately 2 grams of the suspected heroin and/or fentanyl for \$40. Later on or about July 29, 2025, FELDER sold CS-2 additional suspected heroin and/or fentanyl with the same “Sorry Charlie” stamp. Prior to the controlled sale, law enforcement observed FELDER and GARRETT enter the GARRETT’s Land Rover, drive around the area near Salem Lafayette Apartments, and park on Oak Street where FELDER provided CS-2 with two bundles of suspected heroin and/or fentanyl stamped “Sorry Charlie” in exchange for \$100.

### **Sources of Supply for the DTO**

29. The investigation has shown that WEST, GAINES, and FELDER have various sources of supply, including individuals with prescriptions and other Defendants, such as BELL, RODRIGUEZ, CRAWFORD, and REAVES.

30. The investigation has shown that BELL is one of GAINES’s suppliers of narcotics. For example, on or about July 22, 2025, GAINES and BELL had a series of calls, which based upon my training and experience, and the investigation to date, I believe were regarding BELL providing GAINES with

narcotics. At approximately 3:22 p.m., GAINES called BELL and asked, "Where you at? I'm outside." BELL responded, "I'm saying if you was outside the house, I would've told my niece to give it to you." GAINES responded, "Oh alright, alright, oh, oh, alright, alright, you want me to pull up, where uh, where what you call it, pull up at?" BELL replied, "Yeah [Stutters] you could, or if you know where it's at." GAINES responded, "Nah, I'ma, I'ma pull up right there. I'ma let you know. I'ma call you when I'm outside." At approximately 4:10 p.m., GAINES called BELL. GAINES told BELL, "Yo, I'm right here . . . Where you at?" BELL responded, "N\*\*\*\*, don't worry about that. I'm almost there." GAINES asked, "Well, how long you gonna take." BELL responded, "Three days." GAINES replied, "Stop playing bro," and BELL replied, "I don't know like 12 minutes." At approximately 4:32 p.m., BELL called GAINES and asked, "where you at?" GAINES told BELL, "I'm on Oak," and BELL responded, "Alright, you can come to the house." GAINES responded, "Alright." BELL said, "I just told Benny to come to, you want me to give it to him or. . .?," and GAINES replied, "Nah. hell no. I'm about to come get that shit. . . F\*\*\* you talking about?" BELL responded, "Alright, I'm home." At approximately 4:43 p.m., GAINES called BELL and said, "Hey yo . . . come out." BELL responded, "I changed my mind, bro. Imma just keep that money and keep what I got. I ain't got nothing better to do. I'm on the porch yo [Laughs]." BELL then told GAINES, "I'm on the porch." At approximately 4:44 p.m., surveillance units observed GAINES exit a vehicle and walk to a home where BELL is known to reside. GAINES then retrieved an item from BELL, and placed it inside his pocket. Based upon the content of this conversation, my training and experience, and the investigation to date, I believe that GAINES went to BELL's home to retrieve narcotics.

31. The investigation has also shown that RODRIGUEZ and WEST supply each other with prescription pills, which, based upon my training and experience, and the investigation to date, I believe RODRIGUEZ and WEST are then re-selling to third-parties. For example, on or about August 6, 2025, WEST called RODRIGUEZ, and WEST and RODRIGUEZ had the following exchange:

RODRIGUEZ: Yo.

WEST: Hello

RODRIGUEZ: Yo.

WEST: Hey yo, can I grab some RPs for 30?

RODRIGUEZ: Yeah, most likely let me call my man real quick.

WEST: A'right.

RODRIGUEZ: How many you want?

WEST: A'right, let me know. I gotta get it ASAP.

RODRIGUEZ: A'right bet.

WEST: 40.

32. Based on the content of this conversation, my training and experience, and the results of the investigation to date, I believe that WEST and RODRIGUEZ were arranging to meet so that RODRIGUEZ could provide WEST with “RP”s, which I understand to mean prescription pills and that RODRIGUEZ believed he could supply WEST with those narcotics but had to check with his source (“my man”) first.

33. Additionally, on or about August 20, 2025, RODRIGUEZ called WEST, and they had the following conversation:

WEST: Hello.

RODRIGUEZ: Yo, what's goody brody?

WEST: Shit.

RODRIGUEZ: You driving?

WEST: Nah.

RODRIGUEZ: You don't got 15s?

WEST: Nah, I got 30s, yo.

RODRIGUEZ: A'ight, bet. You got Bud too?

WEST: Yeah.

RODRIGUEZ: Quick question, you could do a, how much 15s?

WEST: Twenty, twenty-five.

RODRIGUEZ: You don't got no 20s

WEST: Twenty-dollar ease?

RODRIGUEZ: Mmm-hmm.

WEST: Uh, not right now. Got some pain, but it's some gas.

RODRIGUEZ: Nah, I believe you 100%. I'm , I ain't the one of them gas n\*\*\*\*. I take, my Tylenol's is so low, n\*\*\*\*. If I would [Unintelligible] .

WEST: If I would've had some, uh, my other weed, I would've gave you that shit. I had put that shit up. As a matter of fact, I got something for you.

RODRIGUEZ: I appreciate you. Where you at?

WEST: I'm on Oak.

RODRIGUEZ: I'm about to slide right now. Close to the Jack, uh, 61 or Ocean?

WEST: Huh?

RODRIGUEZ: In the middle or 61?

WEST: [Mumbles] In the middle.

RODRIGUEZ: Copy, just give me a second.

WEST: A'ight.

34. Based on the content of this conversation, my training and experience, and the results of the investigation to date, I believe that RODRIGUEZ was asking for 15-milligram prescription pills. WEST indicated that he only had 30-milligram pills, and that 15-milligram pills were ordinarily \$25. WEST and RODRIGUEZ then agreed to meet up on Oak Street, where WEST and other DTO members have sold narcotics throughout this investigation. Given that RODRIGUEZ has sold narcotics to WEST on other occasions, I believe that RODRIGUEZ and WEST are both buying and selling narcotics to each other, depending on what their customers need.

35. The investigation has shown that CRAWFORD is another one of WEST's suppliers of prescription narcotics. For example, on or about July 18, 2025, CRAWFORD and WEST had phone calls, which based on their contents, my training and experience, and the results of the investigation to date, I understand to be about CRAWFORD providing WEST with prescription pills for resale. At approximately 1:23 p.m., WEST called CRAWFORD, and they had the following conversation:

WEST: Yeah, what's up bro? Hey, which ones you gave me yesterday?

CRAWFORD: K 9.

WEST: What, it was the one with the split in it?

CRAWFORD: It had that split but not the deep split.

WEST: Huh?

CRAWFORD: It had the split but not the deep split, just a round to it.

WEST: But first time you gave me the ones with the deep split, right?

CRAWFORD: Yes, yeah.

WEST: Aight.

CRAWFORD: What's the matter?

WEST: And you gave it to me, what type of bottle it was?

CRAWFORD: Blue.

WEST: Aight. Yeah, I think I misplaced them.

CRAWFORD: That's why you should've took that shit in the house, like you waste too much money for that.

WEST: I'm trying to think, I'm just trying to think hard as hell.

CRAWFORD: We was out there, they was playing football, I think, right, that night?

WEST: Yeah. Let me answer this phone call, I'll call you right back.

CRAWFORD: You know I will, always.

WEST: Aight.

36. Based upon my training and experience and this investigation, I understand that CRAWFORD sold WEST oxycodone pills, which were imprinted with “K 9” and a “split” in the middle in a blue bottle, on or about July 17, 2025, the day before the call, and on a prior occasion, CRAWFORD had sold WEST pills with a “deep split.”

37. At approximately 2:10 p.m. that same day WEST called CRAWFORD back, and they had the following conversation:

CRAWFORD: Yo.

WEST: Alright, uh yeah big bro, alright, yo when you gave me them shits last time, you gave them to me in a bag, right?

CRAWFORD: Yes. The first time was a bag. The second time was a bottle.

WEST: Huh?

CRAWFORD: The first time was a bag, the second time was a bottle.

WEST: Alright and it was 60 the first time, right?

CRAWFORD: It was 69 the first time.

WEST: Alright.

CRAWFORD: The second time was...

WEST: And those were the ones with the split?

CRAWFORD: 55, yeah, yes.

WEST: Alright, alright.

CRAWFORD: You found them?

WEST: Nah, I gotta find them. I gotta really look, yo for real.

CRAWFORD: Alright.

WEST: I got to really look, alright. Thank you.

CRAWFORD: You're welcome.

38. Based upon my training and experience and this investigation, I understand that CRAWFORD confirmed to WEST he sold “69” pills inside a bag in the first drug transaction and “55” pills inside a bottle during the second drug transaction. Based upon the results of the investigation, I believe that WEST then resold these pills to customers.

39. Additional calls between CRAWFORD and WEST have demonstrated that CRAWFORD is also brokering sales of prescription pills from third-parties to WEST. For example, on or about August 5, 2025, at approximately 4:32 p.m., CRAWFORD called WEST and explained, "Somebody got 65 of them things, too. . . . They'd be ready about like 6:00-7:00, like 7:00." WEST responded, "Aight, just call me around that time." CRAWFORD explained, "But listen, if you gonna be ready. If not, I gotta look for somebody else, Bandz." WEST replied, "Yeah, I'm gonna be ready." CRAWFORD responded, "Aight. 'Cause you know you the first one I call and shit. You feel me? . . . I'll see you then my king." Based upon my training and experience and this investigation, I understand that CRAWFORD had an individual willing to sell "65" pills and that WEST is the "first" person CRAWFORD calls when he learns of individuals willing to sell prescription pills. WEST confirmed that he was interested in purchasing the narcotics and that CRAWFORD should call WEST when he was ready to complete the sale.

40. At approximately 5:47 p.m. that same day, CRAWFORD called WEST and asked "you ready? . . . she ready anyway. Where you at?" WEST asked, "How many you said?," and CRAWFORD responded, "60," and asked, "Where you want me to meet you at? On, on the Oak?" WEST confirmed, "yeah," and CRAWFORD responded, "I'm on my way." Based upon my training and experience and this investigation, I understand that CRAWFORD's source was "ready" to sell WEST "60" pills.

41. At approximately 6:26 pm., CRAWFORD called WEST again and explained, "she got 65. You got another 150? . . . It's 5 more out there, I don't got the money for it though." WEST responded, "Nah." At approximately 9:39 p.m., CRAWFORD called WEST and asked, "Where you be?" WEST explained that he was "on Oak," and CRAWFORD responded, "On my way, five minutes." Based upon my training and experience and this investigation, I understand that CRAWFORD's source was looking to sell 5 additional pills for another \$150, but that WEST was not interested in purchasing these additional pills. CRAWFORD and WEST then arranged to meet on Oak Street, where DTO members have conducted drug transactions throughout this investigation, to complete the sale.

42. The investigation has shown that REAVES is another one of WEST's suppliers of prescription narcotics and that WEST has also sold REAVES street drugs such as heroin or crack cocaine. For example, on or about July 21, 2025, at approximately 8:22 p.m., WEST received an incoming call from REAVES. WEST and Reaves had the following exchange:

REAVES: Yo. What's good yo?

WEST: What's up, yo? You don't hit me no more or nothing.

REAVES: Yeah, Mitch did me dirty, man.



WEST: Huh?

REAVES: Them 2 grams, man, stuff was light as hell, yo.

WEST: You said what?

REAVES: What you gave to them um... 'posed to been 2 grams, man. And that's 100 dollars, I'll get it tomorrow too. What's up? Let me hold something 'til tomorrow. I'll get it tomorrow at 10:00.

WEST: The yellow ones?

REAVES: Yeah, that's all I get.

WEST: Aight. Where you at?

REAVES: I'm on Jewett and Bergen [].

WEST: Aight. I'm about to grab some food real quick and Imma come to you.

REAVES: Okay. Aight, we'll talk when you get here.

WEST: Alright.

REAVES: Aight.

43. At approximately 8:55 p.m., WEST called REAVES. REAVES asked, "What time you gonna get here?" and WEST responded, "Yeah, bro, I'm coming to you, just hold on. You gotta give me a minute, bro." At approximately 9:13 p.m., WEST, called REAVES again, and asked, "Where you at?" REAVES responded, "I'm on Jewett and Bergen." WEST replied, "I don't see you, bro," and REAVES said, "Aight. I'm coming outside. You ain't tell me you was coming, I wasn't gonna stand out there. I'm coming outside now." WEST responded, "Hurry up."

44. At approximately 12:37 a.m. on July 22, 2025, WEST received an incoming call from REAVES. WEST and Reaves had the following exchange:

WEST: Yo.

REAVES: Damn, yo, that shit was good. Yo, you still out?

WEST: Yeah, I know that shit was good. I'm out here.

REAVES: Aight, listen, check this out, if you bring me two more grams, then tomorrow you gotta do it is give me 100. I'm taking off like 60 dollars.

WEST: I'ma do you a solid, though. These crazy solids right now that I'm doing you.

REAVES: Huh?

WEST: I said I'm doing you crazy solids. These is crazy solids that I'm doing you.

REAVES: Yeah, so what? I'm paying you tomorrow. You just, you only gave me, you gave me one gram. So if you give me two more that's three grams. That's 105. A hundred dollars, a hundred dollars off, I'm giving you 30 pills.

WEST: How did I gave you 10 hours?

REAVES: Yeah, still, like 80 dollar more. That still don't add up to no \$300.

WEST: Aight, aight.

REAVES: Aight. Come and meet me outside.

WEST: I got you.

45. Based on the content of these conversation, my training and experience, and the results of the investigation to date, I believe that WEST and REAVES were discussing WEST's sale of heroin or crack cocaine to REAVES and REAVES supplying WEST with pills. For example, REAVES referenced WEST providing "3 grams" for "a hundred dollars off" of 30 pills. Based on the investigation to date, WEST appears to be purchasing pills from individuals with prescriptions, which he is then reselling on the street; thus, I believe the reference to the "yellow ones" and "30 pills" refer to prescription drugs that REAVES is selling or trading with WEST in exchange for heroin or crack cocaine, both of which WEST has sold to confidential sources during the investigation.

46. Indeed, subsequent calls confirm that REAVES has a prescription, which he discusses using to obtain pills for WEST. For example, on or about August 11, 2025, WEST called REAVES and REAVES explained, "I'm at the, um doctor office now. Yo, I just called the pharmacist they ain't come in yet. . . . I'm over here at the doctor office getting my script for this week, 'cause I called the pharmacy, she talking 'bout ain't nothing come in yet. Give her a call in another hour or two. But if they don't come in today, probably coming tomorrow. I'll let you know."

47. The investigation has revealed that the DTO distributed in excess of 40 grams of fentanyl, a Schedule II controlled substance; and 28 grams of

cocaine base, a Schedule II controlled substance; as well as quantities of heroin, cocaine, and various prescription narcotics.