
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
v.	:	Hon. Jessica S. Allen
TAHJUAN FERRELL, a/k/a "Jers,"	:	Mag. No. 25-8321
RAYMON RODRIGUEZ, a/k/a "Ray Ray,"	:	<u>FILED UNDER SEAL</u>
RICKY COLON, JR.,	:	
SAYYIED ANDERSON, a/k/a "Sal,"	:	
CARNELL WRIGHT, a/k/a "Jay,"	:	
BRIANT HAYNES, a/k/a "B,"	:	
RASHON WHEELER, a/k/a "Petey,"	:	
DEMETRIUS JULU,	:	
NERO WHITEHEAD, a/k/a "Woo,"	:	
DAWUD CROSS, a/k/a "Mu,"	:	
JOSEPH JOHNSON, a/k/a "Pearl,"	:	
YUSEF MACK, a/k/a "Gutter,"	:	
ALSHARICK KING, a/k/a "Ghost,"	:	
MONTREL JORDAN, a/k/a "Trillz,"	:	
PATRICK JORDAN, a/k/a "Swerve,"	:	
RAHEAM SPRINGER,	:	
IBN ROGERS,	:	
BLAKE HOWARD,	:	
DANIEL VALENTIN,	:	
MEKHI LAWRENCE, a/k/a "MK,"	:	
CRAIG WALKER,	:	

a/k/a "Lean,"	:
KEVIN WILEY,	:
a/k/a "LB,"	:
QUINCE MELVIN,	:
NAKKI MELVIN,	:
RICARDO GONZALEZ,	:
a/k/a "Ricky,"	:
QUADIR SIMMONS,	:
a/k/a "Scoom,"	:
QUASIR MIRANDA,	:
a/k/a "Space," and	:
ZAKIYY HOUSER	
a/k/a "GBK"	

I, David Sheridan, 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 Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

/s/ David Sheridan/SN

David Sheridan, Task Force Officer
Drug Enforcement Administration

Task Force Officer Sheridan attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1

12/3/25

Date

at District of New Jersey
County and State

HONORABLE JESSICA S. ALLEN
UNITED STATES MAGISTRATE JUDGE

/s/Jessica S. Allen/SN

Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Distribute Controlled Substances)

From in or around February 2025 through in or around December 2025, in Essex County, in the District of New Jersey and elsewhere, defendants

**TAHJUAN FERRELL,
a/k/a “Jers,”**
**RAYMON RODRIGUEZ,
a/k/a “Ray Ray,”**
RICKY COLON, JR.,
**SAYYIED ANDERSON,
a/k/a “Sal,”**
**CARNELL WRIGHT,
a/k/a “Jay,”**
**BRIANT HAYNES,
a/k/a “B,”**
**RASHON WHEELER,
a/k/a “Petey,”**
DEMETRIUS JULU,
**NERO WHITEHEAD,
a/k/a “Woo,”**
**DAWUD CROSS,
a/k/a “Mu,”**
**JOSEPH JOHNSON,
a/k/a “Pearl,”**
**YUSEF MACK,
a/k/a “Gutter,”**
**ALSHARICK KING,
a/k/a “Ghost,”**
**MONTREL JORDAN,
a/k/a “Trillz,”**
**PATRICK JORDAN,
a/k/a “Swerve,”**
**RAHEAM SPRINGER,
IBN ROGERS,**
BLAKE HOWARD,
DANIEL VALENTIN,
**MEKHI LAWRENCE,
a/k/a “MK,”**
**CRAIG WALKER,
a/k/a “Lean,”**

**KEVIN WILEY,
a/k/a “LB,”
QUINCE MELVIN,
NAKKI MELVIN,
RICARDO GONZALEZ,
a/k/a “Ricky,” and
QUADIR SIMMONS,
a/k/a “Scoom”**

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a quantity 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)(A) and (b)(1)(C).

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

COUNT TWO
(Unlawful Possession of Ammunition in a School Zone)

On or about February 18, 2025, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**QUASIR MIRANDA,
a/k/a “Space,” and
ZAKIYY HOUSER
a/k/a “GBK,”**

did knowingly and with reckless disregard for the safety of another, discharge and attempt to discharge a firearm that moved in or that otherwise affects interstate and foreign commerce, and the discharge occurred within a distance of 1,000 feet of the grounds of Dr. E. Alma Flagg School, a place that the defendants knew and had reasonable cause to believe was a school zone.

In violation of Title 18, United States Code, Sections 922(q)(3)(A) and 924(a)(4).

COUNT THREE
(Possession with Intent to Distribute Cocaine Base and Fentanyl)

On or about March 7, 2025, in Essex County, in the District of New Jersey, the defendant,

**QUADIR SIMMONS,
a/k/a “Scoom,”**

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 base, a Schedule II controlled substance.

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

ATTACHMENT B

I, David Sheridan, am a Task Force Officer with Drug Enforcement Administration (“DEA”). 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 GRAFTON AVENUE ENTERPRISE

1. The defendants are members or associates of a neighborhood-based street gang operating in and around the Riverside Villa Public Housing Complex (“Riverside”), 4th Avenue and North 12th Street (“4th and N. 12th”), and the Garden Spires Apartments (“the Spires”) in Newark, New Jersey (the “Grafton Avenue Enterprise”), among other areas. While members of the Grafton Avenue Enterprise are affiliated with the Bloods criminal street gang, members and associates represent their neighborhood first and foremost.

2. Members of the Grafton Avenue Enterprise are known to use social media on a variety of platforms and mobile applications, including Instagram, YouTube, X (formerly Twitter), Signal, Telegram, and WhatsApp to conduct the business of the Grafton Avenue Enterprise, communicate with one another, promote the Grafton Avenue Enterprise through sharing photographs and videos, and further the Grafton Avenue Enterprise’s goals.

3. Members of the Grafton Avenue Enterprise have been identified through their outward proclamation of their membership in the criminal enterprise on various social media sites, such as Instagram, and by the use of various colors, clothing, hand signs, emojis, and/or hashtags that are indicative of membership in the Grafton Avenue Enterprise.

4. The Grafton Avenue Enterprise is known for drug distribution in and around its controlled territory—including Riverside, 4th and N. 12th, and the Spires—as well as for violence against numerous rival neighborhoods and gangs. Only individuals who are members or associates of the Grafton Avenue Enterprise can distribute drugs within these areas.

5. Members and associates of the Grafton Avenue Enterprise include Tahjuan Ferrell, a/k/a “Jers” (“FERRELL”), Raymon Rodriguez, a/k/a “Ray Ray” (“RODRIGUEZ”), Ricky Colon, Jr. (“COLON”), Sayyied Anderson, a/k/a “Sal” (“ANDERSON”), Carnell Wright, a/k/a “Jay” (“WRIGHT”), Briant Haynes, a/k/a “B”

(“HAYNES”), Rashon Wheeler, a/k/a “Petey” (“WHEELER”), Demetrius Julu (“JULU”), Nero Whitehead, a/k/a “Woo” (“WHITEHEAD”), Dawud Cross, a/k/a “Mu” (“CROSS”), Joseph Johnson, a/k/a “Pearl” (“JOHNSON”), Yusef Mack, a/k/a “Gutter” (“MACK”), Alsharick King, a/k/a “Ghost” (“KING”), Montrel Jordan, a/k/a “Trillz” (“M. JORDAN”), Patrick Jordan, a/k/a “Swerve” (“P. JORDAN”), Raheam Springer (“SPRINGER”), Ibn Rogers (“ROGERS”), Blake Howard (“HOWARD”), Daniel Valentin (“VALENTIN”), Mekhi Lawrence, a/k/a “MK” (“LAWRENCE”), Craig Walker, a/k/a “Lean” (“WALKER”), Kevin Wiley, a/k/a “LB” (“WILEY”), Quince Melvin (“Q. MELVIN”), Nakki Melvin (“N. MELVIN”), Ricardo Gonzalez, a/k/a “Ricky” (“GONZALEZ”), & Quadir Simmons, a/k/a “Scoom” (“SIMMONS”) (collectively the “Defendants”).

6. During the timeframe relevant to the conspiracy charged in Count One of this Complaint, law enforcement extensively surveilled the area within Riverside, 4th and N. 12th, and the Spires through physical and fixed surveillance; used confidential informants and undercover law enforcement officers to purchase narcotics, including substances that tested positive for the presence of fentanyl, heroin, and cocaine; reviewed arrests and drug seizures made by local law enforcement within the areas under the control of the Grafton Avenue Enterprise; and analyzed telephone records demonstrating interactions between the Defendants, among other lawful means of investigation.

7. The Defendants conspired and agreed with each other and others to distribute large quantities of heroin, fentanyl, and cocaine base in the North Ward of Newark. Since in or around April 2025, through physical and fixed surveillance, law enforcement has observed members of the Grafton Avenue Enterprise 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 and undercover law enforcement to purchase narcotics from members of the Grafton Avenue Enterprise on numerous occasions. Through those controlled purchases, law enforcement seized substances that tested positive for the presence of heroin, fentanyl, and cocaine base.

8. The Defendants worked together to distribute the heroin, fentanyl, and cocaine to their customers. Evidence indicating collaboration among the co-conspirators includes, for example: telephone records showing, in some instances, hundreds of contacts between co-conspirators; collaboration on social media platforms; physical interactions between co-conspirators, and seizure of recurring stamps branding the narcotics, indicating that members of the Grafton Avenue Enterprise obtained their narcotics from common sources of supply, including but not limited to “Thumbs Up,” “Reebok,” “Summer Jam,” “Dunkin Donuts,” “Sexy Red,” and “Elon Musk.”

9. The evidence described below demonstrates that the Defendants acted in concert to control the drug trade in and around the areas in which the Grafton Avenue Enterprise distributed drugs.

CONTROLLED PURCHASES OF CONTROLLED SUBSTANCES

10. DEA used confidential informants and undercover law enforcement to purchase heroin, fentanyl, and cocaine from multiple members of the Grafton Avenue Enterprise. All of these transactions were conducted in or near the areas under the control of the Grafton Avenue Enterprise 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.

<u>Buy No.</u>	<u>In or around the Week of</u>	<u>Defendant</u>	<u>Substances Purchased¹</u>
1	April 28, 2025	ANDERSON	Heroin/Fentanyl
2	April 28, 2025	WRIGHT	Heroin/Fentanyl
3	May 5, 2025	RODRIGUEZ ANDERSON COLON	Heroin/Fentanyl
4	May 5, 2025	WHEELER	Heroin/Fentanyl
5	May 5, 2025	HAYNES	Heroin/Fentanyl
6	May 12, 2025	RODRIGUEZ	Heroin/Fentanyl
7	May 12, 2025	KING	Heroin/Fentanyl
8	May 12, 2025	M. JORDAN P. JORDAN	Heroin/Fentanyl
9	May 12, 2025	HAYNES	Heroin/Fentanyl
10	May 12, 2025	WRIGHT	Heroin/Fentanyl
11	May 26, 2025	M. JORDAN	Heroin/Fentanyl Cocaine Base
12	May 26, 2025	KING	Heroin/Fentanyl
13	May 26, 2025	WILEY	Heroin/Fentanyl
14	June 9, 2025	HAYNES	Heroin/Fentanyl

¹ The substances seized have been submitted for laboratory testing. Laboratory testing results remain pending for substances labeled "suspected."

15	June 16, 2025	FERRELL SPRINGER	Heroin/Fentanyl
16	June 23, 2025	CROSS MACK	Heroin/Fentanyl
17	June 30, 2025	WILEY	Heroin/Fentanyl
18	June 30, 2025	J. JORDAN	Heroin/Fentanyl
19	July 7, 2025	RODRIGUEZ	Heroin/Fentanyl
20	July 14, 2025	CROSS WHITEHEAD	Suspected Heroin/Fentanyl Cocaine Base
21	July 14, 2025	JOHNSON CROSS	Heroin/Fentanyl
22	July 21, 2025	JOHNSON	Heroin/Fentanyl
23	July 21, 2025	WILEY HOWARD VALENTIN	Suspected Heroin/Fentanyl
24	July 28, 2025	JOHNSON	Heroin/Fentanyl
25	August 4, 2025	JOHNSON	Heroin/Fentanyl
26	August 4, 2025	N. MELVIN	Suspected Heroin/Fentanyl
27	August 25, 2025	CROSS JULU	Heroin/Fentanyl
28	August 25, 2025	KING MACK	Heroin/Fentanyl
29	September 8, 2025	RODRIGUEZ COLON	Heroin/Fentanyl
31	September 8, 2025	FERRELL SPRINGER ROGERS	Heroin/Fentanyl
32	August 25, 2025	WRIGHT WILEY	Suspected Heroin/Fentanyl
33	September 15, 2025	VALENTIN Q. MELVIN	Suspected Heroin/Fentanyl
34	September 15, 2025	WILEY FERRELL	Suspected Heroin/Fentanyl
35	September 22, 2025	WILEY	Suspected Heroin/Fentanyl
36	September 29, 2025	WHITEHEAD	Suspected Heroin/Fentanyl

37	September 29, 2025	FERRELL	Heroin/Fentanyl
38	October 6, 2025	WALKER	Suspected Heroin/Fentanyl
39	October 6, 2025	HAYNES	Suspected Heroin/Fentanyl
40	October 6, 2025	WALKER RODRIGUEZ JORDAN FERRELL	Heroin/Fentanyl
41	October 6, 2025	WHEELER	Suspected Heroin/Fentanyl
42	October 6, 2025	LAWRENCE	Suspected Heroin/Fentanyl
43	October 13, 2025	Q. MELVIN WIRGHT	Heroin/Fentanyl
44	November 3, 2025	LAWRENCE	Heroin/Fentanyl
45	November 3, 2025	HOWARD	Suspected Heroin/Fentanyl
46	November 3, 2025	WALKER RODRIGUEZ	Suspected Heroin/Fentanyl
47	November 10, 2025	HOWARD	Suspected Heroin/Fentanyl
48	November 17, 2025	WILEY	Suspected Heroin/Fentanyl
49	November 17, 2025	RODRIGUEZ	Suspected Heroin/Fentanyl
50	November 17, 2025	KING	Suspected Heroin/Fentanyl
51	November 17, 2025	JOHNSON	Suspected Heroin/Fentanyl
52	November 17, 2025	RODRIGUEZ GONZALEZ	Suspected Heroin/Fentanyl

**LAW ENFORCEMENT ARRESTS AND SEIZURES OF CONTROLLED
SUBSTANCES AND FIREARMS INVOLVING THE GRAFTON AVENUE
ENTERPRISE**

February 18, 2025 and March 7, 2025 Seizures

11. On or about February 18, 2025, law enforcement responded to a report of shots fired in the area of 7th Avenue and 3rd Street—territory controlled by the North 5th Street Grape Street Crips. This investigation revealed that the shooting

was committed by individuals associated with the Grafton Avenue Enterprise, including Quasir Miranda, a/k/a "Space" ("MIRANDA"), and Zakiyy Houser, a/k/a "GBK" ("HOUSER").

12. The investigation revealed that prior to the shooting, MIRANDA, HOUSER, and others traveled by way of a taxi from a residence associated with MIRANDA on the 400 block of 4th Avenue, Newark, New Jersey (the "4th Avenue Residence") – a residence known by law enforcement to be utilized by the Grafton Avenue Enterprise in furtherance of their drug trafficking—to the area of the Spires. During the instant investigation, law enforcement conducted multiple controlled purchases of narcotics from the 4th Avenue Residence. Upon arrival in that area, an altercation broke out between individuals associated with the Grafton Avenue Enterprise and others in the vicinity of the Spires, which located in close proximity to the territory of the North 5th Street Grape Street Crips. Shortly thereafter, the Grafton Avenue Enterprise members departed the area of the Spires and walked west on 7th Avenue toward rival gang territory. As they walked past a residence located at the 300 block of 7th Avenue, Victim-1 exited that residence. Almost immediately, HOUSER and MIRANDA began firing numerous rounds in Victim-1's direction, as a result of which Victim-1 retreated inside the residence. The shooting occurred less than approximately 200 feet from the Dr. E. Alma Flagg School which is located on the corner of 7th Avenue and 3rd Street. Law enforcement has identified Victim-1 as an associate of the North 5th Street Grape Street Crips. Law enforcement recovered ten 9-millimeter discharged rounds and four .40 caliber discharged rounds, which were manufactured outside the State of New Jersey.

13. On or about March 7, 2025, law enforcement executed a judicially authorized search warrant at the 4th Avenue Residence in connection with the February 18, 2025 shooting investigation involving HOUSER and MIRANDA. Upon execution of the search warrant, law enforcement located and arrested MIRANDA for the shooting. Also present for the execution of the search warrant was SIMMONS. Upon search of the residence, law enforcement recovered approximately 40 glassine envelopes of suspected heroin/fentanyl stamped "Thumbs Up," 74 vials of suspected cocaine base with green plastic tops, over two hundred empty vials and plastic tops used to package cocaine base and other items of paraphernalia used to package and distribute controlled substances, as well as thirty-seven rounds of 9-millimeter ball point ammunition in a plastic case. The controlled substances, paraphernalia, and ammunition were located in the same bedroom. SIMMONS admitted to law enforcement that the contraband seized at the 4th Avenue Residence was his. Also located in the residence, were the shoes MIRANDA was observed wearing in the February 18, 2025 shooting.

14. On or about October 6, 2025, HOUSER admitted in the Superior Court of New Jersey, Essex Vicinage that he possessed one of the two handguns utilized in the February 18, 2025 shooting.

September 20, 2025 Seizure

15. On or about September 20, 2025, law enforcement observed WILEY with a group of approximately 10-12 other individuals congregating in the area of 4th and 12th. WILEY was observed sitting on nearby steps counting what appeared to be numerous small white items consistent with controlled substances packaged for street level distribution. While conducting surveillance, law enforcement observed WILEY engage in a hand-to-hand transaction with Buyer-1, wherein WILEY provided multiple small items in exchange for U.S. currency.

16. Subsequently, law enforcement observed WILEY engage in another hand-to-hand transaction with Buyer-2, wherein WILEY provided small white objects believed to be a controlled substance in exchange for U.S. currency.

17. Believing they had observed WILEY engage in the distribution of controlled substances, law enforcement approached WILEY to effectuate an arrest. An initial search incident to arrest revealed multiple empty jugs utilized to package cocaine base stored in a bag in his possession. As law enforcement placed WILEY under arrest the nearby group of 10-12 individuals became disruptive necessitating a call for backup. While being placed in handcuffs WILEY attempted to discard his cellphone to the nearby group, by tossing his phone from his pocket while yelling “take my phone,” however, he was unsuccessful. Once safely arrested, a further search of WILEY’s bag revealed four strips of suspected naloxone.

18. While being processed at the police station, a more thorough search incident to arrest was conducted and law enforcement recovered multiple controlled substances from WILEY’s groin area, including approximately nine glassine envelopes of suspected heroin/fentanyl stamped “Reebok” in red ink, two yellow miniature plastic jugs containing suspected cocaine base, one glass vial of suspected cocaine base with a gold, and one plastic sandwich bag containing approximately 3.6 grams of suspected crushed ecstasy pills. WILEY was also found to be in possession on approximately \$121 in U.S. currency.

October 15, 2025 Seizure of Controlled Substances

19. On or about October 15, 2025, while conducting surveillance in the area of 4th and 12th, law enforcement observed HAYNES engage in a hand-to-hand transaction with Buyer-3, exchanging small items retrieved from a clear plastic bag for a quantity of U.S. currency while in the area of the 4th Avenue Residence.² During the transaction HAYNES also retrieved small items from a black plastic bag that he left on the porch of the 4th Avenue Residence. Following their observations, law

² The same 4th Avenue Residence involved in the February 18, 2025 shooting and March 7, 2025 seizure of ammunition.

enforcement approached HAYNES to effectuate an arrest. Once alerted of the presence of law enforcement, HAYNES took flight on foot. After a short foot chase, law enforcement arrested HAYNES.

20. Search incident to the arrest of HAYNES revealed the clear plastic bag which contained approximately 30 glass vials of suspected cocaine base with red tops, 21 glass vials of suspected cocaine base with orange tops, 173 glassine envelopes of suspected heroin/fentanyl stamped "Summer Jam" in blue ink, 7 glassine envelopes of suspected heroin/fentanyl stamped "Devils Son" in black ink, 4 glassine envelopes of suspected heroin/fentanyl stamped "911" in red ink, 4 glassine envelopes of suspected heroin/fentanyl stamped "LV" in green ink, and paraphernalia used to package and distribute controlled substances. HAYNES was also found in possession of approximately \$181 in U.S. currency.

21. Law enforcement recovered the black bag utilized by HAYNES in the hand-to-hand transaction in plain view on the porch of the 4th Avenue Residence. Contained in the black bag were approximately 358 glass vials of suspected cocaine base with red tops, 273 glass vials of suspected cocaine base with orange caps, a prescription pill bottle with a white cap containing 48 yellow suspected oxycodone pills, 41 pink jugs of suspected cocaine base, 100 multicolored suspected ecstasy pills, 250 glassine envelopes of suspected heroin/fentanyl stamped "Summer Jam" in blue ink and paraphernalia used to package and distribute controlled substances.

October 15, 2025 Seizure of Firearms

22. On or about October 15, 2025, while monitoring members and associates of the Grafton Avenue Enterprise through review of publicly available Instagram accounts, law enforcement observed Member-1 and Member-2 both post live videos displaying them in possession of a black handgun while in a Dodge Charger. Law enforcement responded to Riverside where they observed a Dodge Charger. Upon continued surveillance, law enforcement observed Member-1 and Member-2 from the Instagram live video exit the rear of the Dodge Charger. Law enforcement approached the Dodge Charger where they located Member-1 (rear occupant), Member-2 (rear occupant), Member-3 (driver) and P. JORDAN (front passenger). All four occupants including P. JORDAN were detained. Three handguns were observed in plain view on the floorboard of the rear passenger side seat and another handgun was located in plain view under the front passenger side seat.

23. Law enforcement executed a judicially authorized search warrant on the Dodge Charger and recovered: (1) a stolen Glock 48 9-millimeter handgun, bearing serial number CAXA089, loaded with nine ball point rounds of 9-millimeter ammunition; (2) a Glock 48 9-millimeter handgun bearing serial number BKND033 loaded, with ten ball point rounds of 9-millimeter ammunition; (3) a Glock 48 9-millimeter handgun, bearing serial number BTYH863, loaded with six hollow point

rounds and four ball point rounds of 9-millimeter ammunition; and (4) an imitation handgun.³

24. On or about November 28, 2022, P. JORDAN was convicted in the Superior Court of New Jersey, Bergen Vicinage, of aggravated assault contrary to N.J.S.A. 2C:12-1B(7), a third degree felony punishable by over one year in prison, and sentenced to 364 days in jail as a condition of three years' probation.

October 30, 2025 Seizures

25. On or about October 30, 2025, law enforcement executed judicially authorized search warrants at three locations following an investigation into narcotics distribution by ROGERS: (1) a residence on Gareis Street in Newark (the "Gareis Residence"); (2) a storefront located on Clinton Place (the "Clinton Store"); and (3) a residence on Governor Street in Newark (the "Governor Residence").

26. At the Gareis Residence law enforcement recovered a .380 caliber Ruger LCP handgun, bearing serial number 372152311 in a Louis Vuitton bag, a plastic bag containing nine ball point rounds of .380 caliber ammunition, three digital scales with white powdery residue along with a spoon and rubber gloves, documents belonging to ROGERS, a currency counter and approximately \$12,002 in U.S. currency.

27. At the Governor Residence law enforcement located and arrested ROGERS. Also recovered were keys to a safe in the master bedroom that was found to contain approximately \$10,000 in U.S. currency. Also located in the master bedroom was an additional approximately \$610 in U.S. currency, a currency counter, multiple bags of suspected marijuana, two Rolexes, documents belonging to ROGERS. Law enforcement also located keys to the Clinton Store within the residence.

November 24, 2025 Seizure

28. On or about November 24, 2025, law enforcement observed WILEY interacting with an Individual-1 on N. 12th Street in Newark and place a plastic bag into an open Kentucky Fried Chicken bucket he was holding. WILEY then noticed the presence of law enforcement and immediately handed the KFC bucket to Individual-1. Believing they observed WILEY was engaged in the distribution of controlled substances, law enforcement approached WILEY and Individual-1 to conduct an investigatory stop. Law enforcement illuminated the interior of the KFC bucket with their flashlight and immediately recognized the plastic bag discarded inside to contain suspected controlled substances. Law enforcement recovered

³These firearms and ammunition were manufactured outside the State of New Jersey, such that they traveled in and affected interstate commerce prior to Member-1, Member-2, Member-3, and P. JORDAN's possession of them in New Jersey on or about October 15, 2025.

approximately 8 vials⁴ of suspected cocaine base with yellow tops, 3 blue jugs of suspected cocaine base, one transparent jug of suspected crack cocaine, 9 glassine envelopes of suspected heroin/fentanyl stamped “Red Lobster” in purple ink, and approximately 26 suspected ecstasy pills. Search incident to arrest of WILEY revealed he was also in possession of suspected marijuana, 28 strips of suspected naloxone, drug distribution paraphernalia, and \$141 in U.S. currency.

SURVEILLANCE

29. During the timeframe of the conspiracy, law enforcement monitored the Grafton Avenue Enterprise’s territory through physical and fixed surveillance. Over the course of the investigation, law enforcement obtained hundreds of hours of video footage depicting the Grafton Avenue Enterprise engaging in narcotics transactions. The footage captured, among other evidence, the Defendants, among other co-conspirators, engaging in hundreds of narcotics transactions within the areas under the Grafton Avenue Enterprise’s control; 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.

30. 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 more than 400 grams of fentanyl and more than one kilogram of heroin.

PHONE CONNECTIONS

31. Law enforcement has identified phone numbers for various members of the Grafton Avenue Enterprise through a number of investigative techniques. Records for those phone numbers show hundreds of calls between nearly all of the Defendants during the conspiracy period.

⁴ A “jug” and “vial” refers to an individually packaged single dose of cocaine base.