



**ATTACHMENT A**

From on or about September 26, 2016 through on or about June 8, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendants

AHMAD JOHNSON  
a/k/a "OC"  
CARLOS VELASQUEZ  
a/k/a "Birdie"  
SACHA NEGRON  
CORY CANZATER  
a/k/a "Big C"  
MAURICE MCPHATTER  
a/k/a "Ree"  
WILLIE MCPHATTER  
a/k/a "Rock"  
KEITH HENDERSON

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

## **ATTACHMENT B**

I, Javier J. Perez, am a Task Force Officer with the Department of 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, and items of 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.

### **BACKGROUND**

1. In or around January 2016, law enforcement began investigating the drug trafficking organization of Ahmad Johnson a/k/a “OC” (“JOHNSON”). Throughout the course of the investigation, law enforcement has learned that the JOHNSON’s drug trafficking organization (the “Johnson DTO”) obtained wholesale amounts of narcotics, including heroin and cocaine, and processed and packaged the narcotics for sale in and around Newark, New Jersey. At times, after the narcotics were processed and packaged for sale, JOHNSON found users to “test” the narcotics to evaluate the quality, potency, and danger for broader distribution. After the narcotics were tested, members of the Johnson DTO (*i.e.*, “runners”) sold the narcotics to other narcotics distributors and to narcotics users in and around Newark, New Jersey.

### **THE DEFENDANTS AND THEIR ROLES**

2. Throughout the investigation, law enforcement has become aware of the roles of members of the Johnson DTO. At the times relevant to this Criminal Complaint:

3. JOHNSON was a supplier of heroin, cocaine, and cocaine base (*i.e.*, “crack”) in and around Newark, New Jersey.<sup>1</sup>

4. Carlos Velasquez a/k/a “Birdie” (“VELASQUEZ”) was a heroin and cocaine dealer in and around Newark, New Jersey to whom JOHNSON supplied heroin.

5. Sacha Negrón (“NEGRON”) conspired with JOHNSON to obtain,

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<sup>1</sup> As discussed below, JOHNSON was charged by federal criminal complaint, filed on or about June 7, 2017, under Magistrate Number 17-3566, with being a felon in possession of a firearm in violation of Title 18, United States Code, Section 922(g)(1).

process, and supply heroin in and around Newark, New Jersey.<sup>2</sup>

6. Cory Canzater a/k/a “Big C” (“CANZATER”) was a runner, who distributed narcotics for the Johnson DTO.

7. Maurice McPhatter a/k/a “Ree” (“MAURICE MCPHATTER”) was a runner, who distributed narcotics for the Johnson DTO.

8. Willie McPhatter a/k/a “Rock” (“WILLIE MCPHATTER”) was a runner, who distributed narcotics for the Johnson DTO.

9. Keith Henderson (“HENDERSON”) made available his residence in Newark, New Jersey to the Johnson DTO for purposes of processing, packaging, and storing narcotics sold by the Johnson DTO. HENDERSON assisted the Johnson DTO as a runner and money courier.<sup>3</sup>

### **THE INVESTIGATION**

10. On or about September 26, 2016, VELASQUEZ and JOHNSON sold 30 grams of heroin to an individual (“Individual 1”) and an under-cover law enforcement agent (the “UC”) at an agreed upon location in Newark, New Jersey (“First Newark Location”). At an agreed-upon time, Individual 1 and the UC met VELASQUEZ at the First Newark Location for the purpose of conducting this controlled purchase. During the meeting, VELASQUEZ advised that his supplier would be delivering the requested heroin to the area of the First Newark Location. A short while later, a 2014 Dodge Challenger driven by JOHNSON (the “Johnson Vehicle”), arrived at the area of the First Newark Location. VELASQUEZ approached and entered the Johnson Vehicle, exited several moments later with a clear plastic bag, and handed the clear plastic bag to Individual 1, who immediately turned it over to the UC. In exchange for the heroin, VELASQUEZ accepted an amount of United States currency. The substance inside the clear plastic bag subsequently field-tested positive for heroin.

11. On or about November 2, 2016, VELASQUEZ and JOHNSON sold 120 grams of heroin to Individual 1 and the UC. On that day, Individual 1 called VELASQUEZ, and VELASQUEZ stated that “his man” (i.e., JOHNSON) would arrive and meet Individual 1 and VELASQUEZ at an agreed upon location in

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<sup>2</sup> Coconspirator NEGRON was charged by federal criminal complaint, filed on or about June 8, 2017, under Magistrate Number 17-3600, with knowingly and intentionally distributing and possessing with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance in violation of Title 21, United States Code Sections 841(a)(1) and (b)(1)(A).

<sup>3</sup> Coconspirator HENDERSON was charged by federal criminal complaint, filed on or about June 8, 2017, under Magistrate Number 17-3601, with being a felon in possession of a firearm in violation of Title 18, United States Code, Section 922(g)(1).

Newark, New Jersey ("Second Newark Location") at an agreed upon time. Following the call, law enforcement observed JOHNSON entering the Johnson Vehicle and driving to pick up VELASQUEZ. Law enforcement followed the Johnson Vehicle to the "parking lot," which was the Second Newark Location referenced earlier during the call. At the Second Newark Location, law enforcement observed VELASQUEZ exiting the Johnson Vehicle and entering the UC's vehicle. While in the UC's vehicle, VELASQUEZ sold Individual 1 and UC approximately 120 grams of a substance that field-tested positive for heroin in exchange for United States currency.

12. On or about April 13, 2017, JOHNSON and WILLIE MCPHATTER sold two bundles of heroin to an individual ("Individual 2") at a location in Newark, New Jersey (the "Third Newark Location"). During a lawfully intercepted call on the same date, JOHNSON advised Individual 2 that JOHNSON himself was not around to sell 2 bundles of heroin<sup>4</sup> to Individual 2, but that JOHNSON would have someone meet Individual 2 at the Third Newark Location. At the direction of law enforcement, Individual 2 went to the Third Newark Location to conduct this controlled purchase transaction. Individual 2 advised law enforcement that when Individual 2 arrived at the Third Newark Location, a male who identified himself as "Rock" (later identified by law enforcement as WILLIE MCPHATTER) asked if Individual 2 was "OC's people," meaning that he was the individual purchasing narcotics from JOHNSON, and Individual 2 confirmed that Individual 2 was. WILLIE MCPHATTER then sold Individual 2 two bundles of a powdery substance that field-tested positive for heroin in exchange for United States currency.

13. On or about April 18, 2017, during a lawfully intercepted call, JOHNSON and NEGRON agreed to bring heroin to NEGRON's residence in Newark, New Jersey (the "Negron Residence"), and that Negron would help JOHNSON process and prepare the heroin for street sales. In particular, JOHNSON stated that he was "supposed to do shit," and that he was going to bring "the shit over there." Negron stated, "Alright, I'll help you if you want." Following the call, law enforcement established physical surveillance at the Negron Residence, where law enforcement observed the Johnson Vehicle. At approximately 11:25 A.M., an unidentified black male wearing a red sweatshirt ("UM1") entered a red 2006 Dodge registered to NEGRON (the "Negron Vehicle"). At approximately 11:30 A.M., NEGRON entered the Negron Vehicle, which departed from the Negron Residence and returned to the Negron Residence at approximately 11:55 A.M. At this point, when NEGRON exited the Negron Vehicle, she had several grocery bags. She walked to the front door of the Negron Residence, and went inside. At approximately 11:56 A.M., during a lawfully intercepted call, NEGRON asked JOHNSON to let her in. During the same call,

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<sup>4</sup>Based on my training and experience, a "brick" of heroin refers to a package of heroin containing 50 glassine or wax-paper envelopes containing individual hits of heroin. A brick of heroin contains 5 "bundles" of heroin, each of which, in turn, constitute 10 envelopes or "decks" of heroin.

JOHNSON directed FNU LNU a/k/a "Scoob" to open the door for NEGRON. At approximately 1:48 P.M., law enforcement observed JOHNSON exit the Negrón Residence, enter the Johnson Vehicle, and depart the area. At approximately 2:20 P.M., JOHNSON entered the Negrón Residence. At approximately 2:42 P.M. UM1 entered the Negrón Residence. At approximately 3:56 P.M., law enforcement saw JOHNSON drive away from the Negrón Residence, and drive back two minutes later. At approximately 3:58 P.M., during a lawfully intercepted call, JOHNSON directed NEGRON to "bring my bag out." NEGRON replied that she was about to tell JOHNSON that he had "left everything here." Moments later, law enforcement became aware of another call between JOHNSON and NEGRON in which JOHNSON directed NEGRON to "come out back," because the "police right there." At approximately 3:58 P.M., law enforcement observed NEGRON place a large stuffed back pack through the front passenger side window of the Johnson Vehicle. JOHNSON left the area at approximately 4:23 P.M., and at approximately 4:27 P.M., JOHNSON entered his own residence in Newark, New Jersey ("Johnson Residence").

14. On or about May 6, 2017, during a lawfully intercepted call between JOHNSON and MAURICE MCPHATTER, MAURICE MCPHATTER told JOHNSON that he owed JOHNSON money because JOHNSON had provided him with 50 grams of narcotics ("the whole 50") and he had given JOHNSON only \$3100. During the call, JOHNSON also requested that MAURICE MCPHATTER give JOHNSON back 6 grams of narcotics ("I got to get 6 back").

15. On or about May 7, 2017, during a lawfully intercepted call between JOHNSON and HENDERSON, HENDERSON made his residence in Newark, New Jersey (the "Henderson Residence") available to JOHNSON for the processing and production of crack. During the call, JOHNSON asked HENDERSON if he "got, uh, Pyrex over there?," referring to glassware commonly used to cook cocaine into crack. HENDERSON responded that he did not have Pyrex. JOHNSON asked HENDERSON if his stove worked, and HENDERSON responded, "Yeah." JOHNSON, referring to Pyrex, stated, "Alright, I'm 'a bring mine." HENDERSON agreed, stating, "Alright."

16. On or about May 9, 2017, during a lawfully intercepted call between JOHNSON and CANZATER, JOHNSON directed CANZATER to sell narcotics on behalf of the Johnson DTO on "Tuesdays to Thursday," from "8:30 to 3:00." JOHNSON also explained to CANZATER methods that JOHNSON used to avoid detection by law enforcement while JOHNSON sold narcotics. JOHNSON stated that he avoided detection by being "out and about," and "moving around." JOHNSON directed CANZATER to "stay in your G-ride like move around, watch shit like," and to "Keep the attention off you." JOHNSON also confirmed that he would be supplying CANZATER "today" with narcotics so that CANZATER could sell them on behalf of the JOHNSON DTO. JOHNSON stated, "I got you today when anybody hit me and shit," meaning that he would supply narcotics to CANZATER if anyone requested it.

17. On or about May 10, 2017, during a lawfully intercepted call between JOHNSON and CANZATER, JOHNSON said that he was running late to meet with CANZATER because one of JOHNSON's customers, who was a heavy user of heroin (a "fiend"), ordered two bricks ("breezies") of heroin for purchase, and JOHNSON had to prepare the two bricks of heroin for sale ("put they shit together").

18. On or about May 11, 2017, during a lawfully intercepted call between JOHNSON and CANZATER, JOHNSON told CANZATER that JOHNSON would be sending a male heroin customer ("Individual 3") to CANZATER so that CANZATER could sell Individual 3 heroin. During the call, CANZATER asked what Individual 3 "need," and JOHNSON replied that CANZATER should sell Individual 3 "4 bands," of heroin. JOHNSON confirmed that CANZATER had in CANZATER's possession a sufficient amount of heroin to conduct the transaction, and then JOHNSON stated that he would tell CANZATER "where to go and shit," and that "in a few seconds, he's going to pull up." Approximately ten minutes later, during another lawfully intercepted call between JOHNSON and CANZATER, JOHNSON provided CANZATER with Individual 3's name. CANZATER confirmed that he saw Individual 3 ("I got him"), and JOHNSON stated that Individual 3 was a profitable heroin customer ("That guy is straight money man.").

19. On or about May 12, 2017, during a lawfully intercepted call between JOHNSON and a female narcotics customer ("Individual 4"), JOHNSON directed Individual 4 to meet with CANZATER. Approximately six minutes after the call, using physical surveillance, law enforcement observed a hand to hand transaction between CANZATER and Individual 4. A few minutes after observing the hand to hand transaction, during another lawfully intercepted call, CANZATER requested that JOHNSON provide more crack ("chips") because CANZATER did not have enough crack to make sales to the customers coming to see him. JOHNSON advised CANZATER that JOHNSON would be responding to CANZATER's location, where law enforcement was conducting physical surveillance. At approximately 12:25 P.M., a white vehicle ("Customer Vehicle") parked next to a black Ford Expedition driven by CANZATER ("Canzater Vehicle"). An individual ("Individual 5") exited the front passenger's side of the Customer Vehicle and got into the Canzater Vehicle, which travelled to a nearby location to meet with JOHNSON, who was driving the Johnson Vehicle. At approximately 12:31 P.M., CANZATER got out of the Canzater Vehicle, walked toward the JOHNSON vehicle, made contact with JOHNSON on the passenger's side of the Johnson Vehicle, reached into the Johnson Vehicle, and retrieved an unknown object, which CANZATER placed inside his sweatshirt before returning to the Canzater Vehicle, which travelled to where the Customer Vehicle had been parked. Individual 5 got into the passenger's side of the Customer Vehicle, which law enforcement stopped at approximately 12:45 P.M. During a lawful search of the vehicle, law enforcement discovered 24 glassine envelopes of a substance

that law enforcement suspected to be heroin and 8 glass vials of a substance that law enforcement suspected to be crack.

20. On or about May 13, 2017, during a lawfully intercepted call between JOHNSON and WILLIE MCPHATTER a/k/a "Rock," JOHNSON threatened to stop supplying cocaine to an unknown male who owed JOHNSON money ("let that nigga starve with that coke"), and that JOHNSON would instead supply cocaine to his co-conspirators ("We gon' sell the coke"). JOHNSON explained to WILLIE MCPHATTER that JOHNSON kept track of the quantities of narcotics he provided to his sellers in the area that he controlled. For example, referring to cocaine base, JOHNSON stated that he gave "50 of them" to FNU LNU a/k/a "Beanie"; "a ounce" to WILLIE MCPHATTER; "10" to FNU LNU a/k/a "Rah" ("RAH"); "two clips" to CANZATER; "three" to FNU LNU a/k/a "Slack"; and "the other five" to FNU LNU a/k/a "Youngin."<sup>5</sup>

21. On or about May 18, 2017, during a lawfully intercepted call between MAURICE MCPHATTER and JOHNSON, JOHNSON stated that he was awaiting the receipt of a large quantity of narcotics, but that, in the meantime, JOHNSON would supply MAURICE MCPHATTER, WILLIE MCPHATTER, and himself with narcotics for sale. In particular, JOHNSON stated that he would "load you and load Roc and load myself," which would "Keep us straight till that shit come through." MAURICE MCPHATTER told JOHNSON to "let me know," and JOHNSON stated, "I got you, Ree," referring to MAURICE MCPHATTER.

22. On or about May 20, 2017, during a lawfully intercepted call, JOHNSON spoke to a third party in his presence ("Individual 6"), who was a heroin user. In order to avoid the danger of using the narcotics himself, JOHNSON was using Individual 6 to evaluate the quality, potency, and danger of JOHNSON's heroin for broader distribution. JOHNSON stated, "Hold on, don't move, bro. Don't move. Get that needle right there. Get that needle. You good, bro. Put that needle up. Yo, watch it bro, watch it. You gon' fuck around and poke me with that needle, ain't got time for that."

23. On or about May 23, 2017, during a lawfully intercepted call between JOHNSON and MAURICE MCPHATTER, JOHNSON asked him how many grams of heroin he had left to sell ("how much of that shit you got left"). MAURICE MCPHATTER responded that he had 50 grams of heroin left to sell ("I got 50 left") and that he planned to "stay out" and sell the heroin.

24. On or about May 23, 2017; during a lawfully intercepted call between JOHNSON and RAH, JOHNSON and RAH tallied proceeds, collected by KEITH HENDERSON, from the sale of heroin. JOHNSON asked whether RAH remembered when JOHNSON "gave you the mother fucking two brick you gave Keith the money, right?" JOHNSON explained, "I gave Keith, sent Keith with the

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<sup>5</sup> Based on my training and experience, a "clip" refers to a group of ten glass vials of crack, often held together with a rubber band.



money for the breeze you had for me.” RAH replied, “Yeah, yeah.” JOHNSON further stated that he had given RAH “two more on top . . . with the 10,” and that RAH had paid JOHNSON “300 when you came to the house and got the grams.” JOHNSON clarified that the payment was for heroin (“breezie”) and that the money “wasn’t for the coke.” RAH replied, “when I came to your house, I paid you for the first two I got for you. Then the last time I sent Keith downstairs.” JOHNSON asked, “you said you sent Keith down for what, the money, right?” RAH confirmed, “Yeah, I sent Keith down to get the money.” JOHNSON replied, “And I gave him two bricks,” referring to heroin.

25. On or about May 27, 2017, during a lawfully intercepted call between JOHNSON and RAH, JOHNSON stated, “I got the dope for you” and offered to sell heroin to RAH for \$36 per gram (“I’m ‘a sell it to you the same price I get it Rah, 36”). RAH agreed to the purchase, stating “I’m ‘a have to just buy some grams from you.” Specifically, RAH agreed to purchase ten grams of heroin for \$360 (“360 for, um, ten”). Later, on the same date, during another lawfully intercepted call between JOHNSON and RAH, RAH requested to purchase heroin (“You got any regular?”) from JOHNSON who offered to sell RAH five bricks of heroin (“You want me to just bring you five of that?”). RAH agreed to purchase “five things of those.”

26. On or about June 3, 2017, during a lawfully intercepted call between JOHNSON and RAH, RAH asked JOHNSON to sell him a brick of heroin (“breezie”). JOHNSON replied that he had to process the heroin before he could provide the brick to RAH (“I gotta put some more together for that”). JOHNSON asked whether RAH was requesting five vials of cocaine base (“5 chips”) or a brick of heroin (“Yam”). RAH stated that he would “just wait” until JOHNSON was “ready” with the narcotics and that RAH would “go get it from Keith,” referring to HENDERSON.

27. On or about June 5, 2017, at approximately 9:00 P.M., during lawfully intercepted calls, JOHNSON indicated, in sum and substance, that he planned to use a gun to shoot another person. Based on these recorded conversations, law enforcement travelled to a location in Newark, New Jersey, where law enforcement observed what appeared to be an altercation in the street. During the altercation, law enforcement observed the Johnson Vehicle flee the scene at a high rate of speed. Law enforcement followed the vehicle and conducted a motor vehicle stop. Upon approaching the vehicle, law enforcement detected a strong odor of marijuana. Law enforcement asked the driver, who identified himself as JOHNSON, and the passenger to exit the vehicle. JOHNSON stated, in sum and substance, “There ain’t shit in this car, you can search the whole thing if you want to.” Law enforcement then conducted a search of the vehicle and found a black and silver Bersa Thunder .380 caliber pistol, bearing serial number 452357 (the “Firearm”), loaded with four ball point .380 caliber

rounds. Subsequently, JOHNSON was charged in Essex County as a certain person prohibited from possessing weapons in violation of NJSA 2C:39-7.<sup>6</sup>

28. On or about June 6, 2017, JOHNSON, from Essex County Correctional Facility called NEGRON, who dialed RAH into the call. NEGRON stated that, following JOHNSON's arrest, she and RAH obtained "all" JOHNSON's "shit" from "Johnny Red" at the Johnson Residence. JOHNSON asked if NEGRON "got that kilo too." NEGRON stated that "Johnny Red" had given NEGRON JOHNSON's "whole bookbag." Additionally, during the call, JOHNSON directed RAH to go to the kitchen of the Johnson Residence to retrieve "the cereal box in the cabinet" and to bring the "cereal box" to NEGRON. RAH agreed to do so.

29. On or about June 8, 2017, law enforcement executed a search warrant at the Negrón Residence. Upon execution of the search warrant, NEGRON was found inside the Negrón Residence. During a search of the Negrón Residence, law enforcement found, inside a bag inside a cereal box inside a closet in a bedroom on the second floor of the Negrón Residence, approximately 1004.5 grams (net weight) of heroin. Inside a back pack in a separate bedroom on the second floor of the Negrón Residence, law enforcement found: Two (2) sandwich bags and over 200 vials filled with a total of approximately 241.2 grams (net weight) of cocaine base; and two plastic bags containing a total of approximately 158.4 grams of fentanyl.

30. On or about June 8, 2017, law enforcement executed a search warrant at the Henderson Residence. Upon entrance into Henderson Residence, law enforcement observed HENDERSON exiting the bathroom after attempting unsuccessfully to flush what appeared to law enforcement to be marijuana, crack cocaine, and heroin down the down the toilet. In a cabinet in the living room, law enforcement observed a plastic bag, which contained: a 9mm Master Piece Arms Mac-11, bearing serial number F19740; a high capacity magazine loaded with twenty-one (21) 9mm bullets; three (3) live Remington 20 Gauge shotgun shells; a small digital scale with cocaine and marijuana residue; and packaging material for narcotics. On the top of a dresser in the bedroom, law enforcement found two (2) small digital scales with marijuana residue.<sup>7</sup>

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<sup>6</sup> This occurrence on or about June 5, 2017 is the basis for the federal complaint against JOHNSON for the violation of 18 United States Code, Section 922(g)(1), discussed above, in footnote 1.

<sup>7</sup> This occurrence on or about June 8, 2017 is the basis for the federal complaint against HENDERSON for the violation of 18 United States Code, Section 922(g)(1), discussed above, in footnote 3.