# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	: Hon. Michael A. Hammer
<b>v</b> .	Mag. No. 18-4166
JOHN MOSLEY, a/k/a "Breezy," a/k/a "Brazy," JAVON HOLMES,	CRIMINAL COMPLAINT
a/k/a "J-Dot," PATRICIO HERNANDEZ,	
JONATHAN HERNANDEZ, JONATHAN GARCIA, a/k/a "Bebo,"	:
JAHID VAUTERS, a/k/a "K,"	• : :
a/k/a "KO" EUGENE WILLIAMS, a/k/a "Popa,"	
a/k/a "Papa," ANGELO WEST,	
a/k/a "Come Up," QUAHEEM BETHEA, a/k/a "Troub,"	
DAVID LAMAR, a/k/a "Brazy Ru,"	:
IBN SAADIQ, a/k/a "Zero," MALIK MINOR,	
a/k/a "YK," OMAR JONES,	
a/k/a "Torch," SAEED DAWES, a/k/a "Nasty,"	
KAREN ARMSTRONG, ROBERT DORRAH,	
a/k/a "Cash Out," and SHAKA MCKINNEY	:

I, James G. Dobis, 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 of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

#### SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

James G. Dobis, Special Agent Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to and subscribed in my presence, ESSEX COUNTY, NEW JERSEY This 10th day of October, 2018

HONORABLE MICHAEL A. HAMMER UNITED STATES MAGISTRATE JUDGE County and State

Thickard

Signature of Judicial Officer

#### ATTACHMENT A

#### COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base)

From at least in or around December 2017 through in or around October 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

JOHN MOSLEY. a/k/a "Breezy," a/k/a "Brazy," JAVON HOLMES, a/k/a "J-Dot," PATRICIO HERNANDEZ. JONATHAN HERNANDEZ, JONATHAN GARCIA. a/k/a "Bebo," JAHID VAUTERS, a/k/a "K," a/k/a "KO" EUGENE WILLIAMS, a/k/a "Popa," a/k/a "Papa," ANGELO WEST, a/k/a "Come Up," DAVID LAMAR, a/k/a "Brazy Ru," IBN SAADIQ, a/k/a "Zero," MALIK MINOR, a/k/a "YK," SAEED DAWES, a/k/a "Nasty," and KAREN ARMSTRONG,

did knowingly and intentionally conspire and agree with each other and others, known and unknown, to distribute and possess with intent to distribute 280 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) and (b)(1)(A).

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

#### **COUNT TWO**

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin)

From at least in or around December 2017 through in or around October 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

JOHN MOSLEY, a/k/a "Breezy," a/k/a "Brazy," JAVON HOLMES, a/k/a "J-Dot," JAHID VAUTERS, a/k/a "K," a/k/a "KO" EUGENE WILLIAMS, a/k/a "Popa," a/k/a "Papa," ANGELO WEST, a/k/a "Come Up," QUAHEEM BETHEA, a/k/a "Troub," IBN SAADIQ, a/k/a "Zero," MALIK MINOR, a/k/a "YK," **OMAR JONES**, a/k/a "Torch," SAEED DAWES, a/k/a "Nasty," **KAREN ARMSTRONG**, and **ROBERT DORRAH.** a/k/a "Cash Out,"

did knowingly and intentionally conspire and agree with each other and others, known and unknown, to distribute and possess with intent to distribute 100 grams 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)(B).

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

## COUNT THREE

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

On or about August 2, 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

## ANGELO WEST, a/k/a "Come Up,"

knowingly did possess a firearm, namely a Glock Model 23 .40 caliber firearm, bearing serial number KDW609, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, the conspiracy to distribute and possess with intent to distribute heroin charged in Count Two of this Complaint.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

## **COUNT FOUR**

(Possession of a Firearm by a Convicted Felon)

On or about August 31, 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

## SHAKA MCKINNEY,

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce one firearm, namely a Lorcin 9mm Luger Model L9NN semi-automatic pistol, bearing serial number L118876.

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

#### COUNT FIVE

(Possession of Firearms by a Convicted Felon)

On or about October 3, 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

## JAHID VAUTERS, a/k/a "K," a/k/a "KO,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce two firearms, namely: (1) a Smith & Wesson Model SW9GVE 9mm caliber firearm, bearing serial number PDB2903; and (2) a Ruger Model LCR .357 caliber Magnum revolver, bearing serial number 54608627.

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

## COUNT SIX

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

On or about October 3, 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

# JAHID VAUTERS, a/k/a "K," a/k/a "KO,"

knowingly did possess two firearms, namely (1) a Smith & Wesson Model SW9GVE 9mm caliber firearm, bearing serial number PDB2903, and (2) a Ruger Model LCR .357 caliber Magnum revolver, bearing serial number 54608627, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, the conspiracy to distribute and possess with intent to distribute heroin charged in Count Two of this Complaint.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

#### ATTACHMENT B

I, James G. Dobis, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. 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 statements of others are related herein, they are related in substance and in part. 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. Furthermore, explanations in parentheses are based upon my knowledge and experience, the knowledge, training, and experience of law enforcement agents and officers with whom I have spoken, and the results of the investigation to date. Contents of statements and meetings are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared by monitors. In addition, quotations and descriptions of intercepted wire and electronic communications are based on preliminary draft transcripts of those communications.

#### **The Investigation**

1. Since in or around April 2017, ATF has been investigating the members and associates of a street gang known as the "Famous Boyz" that operates in the District of New Jersey, and elsewhere. To date, ATF's investigation has included the use of lawfully recorded conversations, court-authorized wiretaps of various cellphones, surveillance, search warrants, witness interviews, and other lawful means of investigation.

2. Based on the investigation to date, the Famous Boyz are a set of Brick City Brims, which, in turn, is a set of the national street gang known the Bloods. The Famous Boyz were founded in Newark, New Jersey in or around 2014 and operate primarily in and around the area of South 18th Street and 15th Avenue, in Newark, New Jersey, which often referred to by members and associates of the Famous Boyz in shorthand as the "8 Block," "18th," or simply by reference to the number eight ("8") (the "South 18th Street/15th Avenue Area").

3. Specifically, the investigation has revealed that members and associates of the Famous Boyz distribute narcotics, including heroin and crack cocaine, in and around the South 18th Street/15th Avenue Area and elsewhere in and around Newark, New Jersey. The investigation also has revealed that the Famous Boyz are involved in the possession—and use—of firearms in connection with drug trafficking offenses and in furtherance of the gang.

#### Narcotics Distribution by the Famous Boyz

4. Based on the investigation, including but not limited to controlled purchases of narcotics, seizures of narcotics from customers of the Famous Boyz, court-authorized wiretaps of various cellphones, and witness interviews, the Famous Boyz have distributed more than 100 grams of heroin and more than 280 grams of crack cocaine since in or around December 2017.

5. Law enforcement also has learned that JOHN MOSLEY, a/k/a "Breezy," a/k/a "Brazy" ("MOSLEY") is a primary source of narcotics for the Famous Boyz and often directs the drug operations of the Famous Boyz. Furthermore, law enforcement has learned that the Famous Boyz, including MOSLEY and Javon Holmes, a/k/a "J-Dot" ("HOLMES"), also use juveniles to conduct their narcotics trafficking activities.

6. The heroin sold by the Famous Boyz has been packaged in "decks," or glassine envelopes stamped or labeled with various "brands," thus allowing dealers and addicts alike to differentiate and market batches of heroin.<sup>1</sup> For example, the investigation revealed that heroin stamped "Good and Plenty" was popular among the Famous Boyz and their customers alike.

7. In addition, crack cocaine sold by the Famous Boyz often was packaged either in vials for which the Famous Boyz would charge \$5 each (referred to as "nickels" or "nicks") or vials for which the Famous Boyz would charge \$10 each (referred to as "dimes" or "cookies").<sup>2</sup>

#### Controlled Buys of Heroin from the Famous Boyz

8. Between in or around December 2017 and in or around October 2018, law enforcement has conducted dozens of controlled purchases of heroin from the Famous Boyz in the South 18th Street/15th Avenue Area and elsewhere in and around Newark, New Jersey, including but not limited to purchases from the following individuals: MOSLEY, HOLMES, Angelo West, a/k/a "Come Up" ("WEST), Quaheem Bethea, a/k/a "Troub" ("BETHEA"), Jahid Vauters, a/k/a "K," a/k/a "KO" ("VAUTERS"), Malik Minor, a/k/a "YK" ("MINOR"), and Ibn Saadiq, a/k/a "Zero" ("SAADIQ"). ATF has used at least

<sup>&</sup>lt;sup>1</sup> A "deck" of heroin commonly refers to a single-dose packet, or glassine envelope, of heroin. A "bundle" of heroin commonly refers to approximately 10 decks of heroin, often packaged together. A "brick" of heroin commonly refers to approximately 50 decks, or 5 bundles, of heroin, often packaged together. Based on my training and experience, each brick contains approximately one gram of heroin.

<sup>&</sup>lt;sup>2</sup> Based on my training and experience, a "dime" contains approximately onetenth of a gram of heroin.

five confidential sources and three undercover agents to conduct these controlled purchases.<sup>3</sup>

Week of Transaction <sup>4</sup>	Target Subject(s) Involved	Quantity Purchased
12/4/2017	WILEY WILLIAMS <sup>5</sup>	45g (heroin)
1/8/2018	HOLMES; WEST	16g (heroin)
2/12/2018	HOLMES	15g (heroin); 9g (crack cocaine)
3/5/2018	HOLMES	26g (heroin)
3/5/2018	BETHEA	10g (heroin)
4/2/2018	MOSLEY; HOLMES	21g (heroin); 8g (crack cocaine)
4/16/2018	MOSLEY; HOLMES	17g (heroin); 20g (crack cocaine)
4/16/2018	BETHEA	18g (heroin)
4/30/2018	BETHEA, WEST	19g (heroin)
4/30/2018	MOSLEY	55g (heroin)
5/7/2018	BETHEA, WEST	22g (heroin)
5/21/2018	HOLMES <sup>6</sup>	48g (heroin); 38g (crack cocaine)

<sup>&</sup>lt;sup>3</sup> Unless otherwise noted, the substances purchased were suspected heroin and crack cocaine and field-tested positive for the suspected controlled substance. The weights provided are estimated gross weights, including any packaging in which the suspected narcotics were purchased.

<sup>&</sup>lt;sup>4</sup> The controlled purchases listed in this chart did not necessary occur on the dates listed but, instead, occurred the week beginning with the Monday dates listed herein. The chart does not include all controlled purchases.

<sup>&</sup>lt;sup>5</sup> Wiley Williams currently is facing gun and drug charges in a separate matter. <u>See United States v. Williams</u>, Crim. No. 18-492 (MAS).

<sup>&</sup>lt;sup>6</sup> MOSLEY drove HOLMES to this controlled buy.

Week of Transaction <sup>4</sup>	Target Subject(s) Involved	Quantity Purchased
6/4/2018	BETHEA, WEST	14g (heroin)
		31g (heroin);
6/18/2018	WEST, MOSLEY	17g (crack cocaine)
		30g (heroin);
6/25/2018	WEST, MOSLEY	30g (crack cocaine)
7/2/2018	MOSLEY	101g (heroin)
7/30/2018	MOSLEY	196g (heroin)
		15g (heroin);
8/6/2018	WEST	22g (crack cocaine)
8/13/2018	WEST	98g (heroin)
8/13/2018	MOSLEY	238g (heroin)
8/20/2018	MOSLEY	36g (crack cocaine)
8/20/2018	CC-3; MINOR; VAUTERS	22g (heroin)
8/27/2018	VAUTERS	29g (heroin)
9/3/2018	HOLMES; VAUTERS	28g (heroin); 19g (crack cocaine)
9/3/2018	MINOR; CC-3; CC-9	29g (heroin)
9/10/2018	MINOR; HOLMES	41g (heroin); 25g (crack cocaine)
9/17/2018	MINOR; HOLMES	47g (heroin); 66g (crack cocaine)
9/17/2018	SAADIQ	26g (heroin)
9/24/2018	SAADIQ	47g (heroin)
9/24/2018	MINOR; HOLMES	42g (heroin); 17g (crack cocaine)

Week of	Target Subject(s)	Quantit <del>y</del>
Transaction <sup>4</sup>	Involved	Purchased
10/1/2018	SAADIQ	44g (heroin)

9. Subsequent laboratory testing also confirmed that some of the heroin sold by the Famous Boyz, including MOSLEY and BETHEA, contained a fentanyl analog, which is a highly-addictive and dangerous substance. Moreover, MOSLEY knew from at least one of his regular customers that the substances he was selling contained fentanyl. Specifically, on or about August 12. 2018, at approximately 12:23 p.m., a customer ("Customer-2") called MOSLEY. During the conversation, Customer-2 asked what MOSLEY had, and MOSLEY responded "Maserati." (Customer-2 was asking what stamps of heroin MOSLEY had to sell.) The conversation continued, and MOSLEY asked, "what up my boy?" Customer-2 responded, "I'm coming up there but yo I know I'm annoving you lately but I really don't want nothing garbage, yo." MOSLEY responded "Aight." Customer-2 stated, "Was that 3, was that five-- you gave it to me again bro-- I got four fucking bundles for that shit. I don't even-- I'm not even doing nothing with it." MOSLEY started to respond, "Yeah but uh--" and Customer-2 stated, "You know what I'm saying? I'll be honest- cause it's fentanyl bro, I don't want to kill myself, you know what I'm trying to say like -- " MOSLEY stated, "Yeah." Customer-2 added, "I'm just trying to fucking like have a good time not kill myself." Customer-2 asked, "I don't know if you got anything else but--" and MOSLEY responded, "I got Maserati." Customer-2 asked how it was, and MOSLEY said, "they said that shit good." Customer-2 responded, "Aight so I'm gonna come up there," and MOSLEY said, "Aight."

10. Based on the investigation to date, the context of the call, and my training and experience, Customer-2 was calling MOSLEY to complain about the four bundles of heroin that MOSLEY previously had sold to Customer-2. Customer-2 claimed that the heroin he previously purchased had fentanyl in it, and asked that MOSLEY sell him a different stamp of heroin. MOSLEY indicated that he had heroin stamped "Maserati" and told Customer-2 that it was "good." Customer-2 agreed to purchase "Maserati" from MOSLEY. Based on laboratory results received in connection with controlled purchases of heroin made by law enforcement, some of the heroin sold by MOSLEY was determined to contain both heroin and a fentanyl analog.

## **Controlled Buys of Crack Cocaine from the Famous Boyz**

11. In addition, law enforcement also conducted approximately a dozen controlled purchases of crack cocaine, as outlined below. These purchases

sometimes occurred in conjunction with purchases of heroin and other times occurred independently.

Week of Transaction <sup>7</sup>	Target Subject(s) Involved	Quantity Purchased
2/12/2018	HOLMES	15g (heroin); 9g (crack cocaine)
4/2/2018	MOSLEY; HOLMES	21g (heroin); 8g (crack cocaine)
4/16/2018	MOSLEY; HOLMES	17g (heroin); 20g (crack cocaine)
5/21/2018	HOLMES <sup>8</sup>	48g (heroin); 38g (crack cocaine)
6/18/2018	WEST, MOSLEY	31g (heroin); 17g (crack cocaine)
6/25/2018	WEST, MOSLEY	30g (heroin); 30g (crack cocaine)
8/6/2018	WEST	15g (heroin); 22g (crack cocaine)
8/20/2018	MOSLEY	36g (crack cocaine)
9/3/2018	HOLMES; VAUTERS	28g (heroin); 19g (crack cocaine)
9/10/2018	MINOR; HOLMES	41g (heroin); 25g (crack cocaine)
9/17/2018	MINOR; HOLMES	47g (heroin); ббg (crack cocaine)

<sup>&</sup>lt;sup>7</sup> The controlled purchased listed in this chart did not necessary occur on the dates listed but, instead, occurred the week beginning with the Monday dates listed herein.

<sup>&</sup>lt;sup>8</sup> MOSLEY drove HOLMES to this controlled buy.

Week of	Target Subject(s)	Quantity
Transaction <sup>7</sup>	Involved	Purchased
9/24/2018	MINOR; HOLMES	42g (heroin); 17g (crack cocaine)

12. As described below, MOSLEY often supplied other Famous Boyz with crack cocaine for resale. In turn, MOSLEY received his supply of cocaine, which he would cook into crack cocaine, from several other individuals, including but not limited to P. HERNANDEZ, J. HERNANDEZ, and GARCIA, as detailed below.

#### The Narcotics Conspiracy

13. Based on the ongoing investigation, law enforcement has determined that, in addition to selling narcotics in the South 15th Street/18th Avenue Area and elsewhere in Newark, New Jersey, the Famous Boyz have shared narcotics, customers, and firearms with one another in furtherance of their narcotics-trafficking activities. They also have used social media to promote the gang's criminal activities, including by advertising their narcoticstrafficking activities and proceeds and by threatening both rival gang members and any individuals who consider cooperating with law enforcement.

#### Javon Holmes, a/k/a J-Dot

14. HOLMES sold heroin and crack cocaine to customers, often at the direction of MOSLEY and/or with narcotics supplied by MOSLEY. As noted above, law enforcement has conducted approximately 10 controlled purchases of narcotics from HOLMES, including purchases of heroin and crack cocaine.

15. For example, on or about July 31, 2018, at approximately 11:37 a.m., a customer ("Customer-1") called MOSLEY. During the telephone conversation, Customer-1 asked if MOSLEY was around. MOSLEY said he was, and Customer-1 said "Aight, what kind you got?" (Customer-1 was asking MOSLEY what kind of heroin MOSLEY had.) MOSLEY responded, "I got, I got Total Control,' [U/I]<sup>9</sup>, 'One Hundred."" (Heroin is packaged for street-level distribution in glassine envelopes and these glassine envelopes will often bear a label or a stamp that is used by dealers and addicts alike to differentiate and market batches of heroin. Based on the investigation, "Total Control" and "100" were heroin stamps used by MOSLEY and the Famous Boyz.) Customer-1 asked, "You got both?" Mosley answered, "DEBO," and Customer-1 said,

<sup>&</sup>lt;sup>9</sup> "[U/I]" means that, at this juncture, the portion of the conversation so designated cannot be heard on readily available equipment.

"Yeah, let me get that, let me get that 'DEBO shit." (Based on the investigation, including controlled purchases of narcotics, law enforcement has learned that MOSLEY has sold heroin stamped "DEBO.") MOSLEY said "alright," and Customer-1 told MOSLEY, "Aight I need fucking two buns bro and uh, a 60 piece." (Customer-1 was ordering 2 bundles of heroin and \$60 dollars of crack cocaine from MOSLEY.<sup>10</sup>) Customer-1 asked where he should go, and MOSLEY told him to "Go on 19th." Customer-1 said he was on his way.

16. Shortly thereafter, at approximately 12:03 p.m., MOSLEY called HOLMES. During the telephone conversation, MOSLEY told HOLMES that "My sale about to pull up, yo, he want 2 bundles and 60 dollars worth of cook up." (MOSLEY was telling HOLMES about the order for 2 bundles of heroin and \$60 dollars of crack cocaine, often referred to in slang as "cook up," that MOSLEY had received from Customer-1.) HOLMES responded, "Aight." MOSLEY stated, "He about to pull up on the 9." HOLMES again said "Aight." (Based on the investigation, law enforcement believes that MOSLEY was informing HOLMES about the sale so that HOLMES could sell the requested narcotics to Customer-1 on behalf of MOSLEY.)

17. As an additional example, on or about August 7, 2018, at approximately 5:12 p.m., HOLMES called MOSLEY. During the telephone conversation, HOLMES asked MOSLEY, "You know that brick that you just gave me?" MOSLEY said yes, and HOLMES stated, "That shit wet as hell." MOSLEY then told HOLMES, "Aight, aight. Bring it back to me." (Based on the investigation, HOLMES was complaining to MOSLEY that the brick of heroin MOSLEY gave to HOLMES for sale was wet, and MOSLEY told HOLMES that HOLMES could return it to MOSLEY.)

18. On or about August 8, 2018, at approximately 7:30 p.m., Customer-2 called MOSLEY and asked if MOSLEY was "up there" (meaning was MOSLEY out and able to sell narcotics). MOSLEY responded yes and asked what Customer-2 needed. Customer-2 then stated that he wanted "probably two or three" (meaning two to three bundles of heroin) and discussed with MOSLEY what stamps of heroin MOSLEY had for sale. Customer-2 stated that he wanted "Total Control" and MOSLEY agreed. At approximately 7:55 p.m., Customer-2 called MOSLEY and stated, "I'm here." MOSLEY responded, "J-Dot know where all my shit at" and told Customer-2 "I'm coming right now." (MOSLEY was telling Customer-2 that HOLMES knew where MOSLEY's supply of heroin was and could help to fulfill the order.)

19. On or about August 9, 2018, at approximately 1:56 p.m., MOSLEY received another order for heroin from a customer ("Customer-3"). In response, MOSLEY told Customer-3, "Just call my little brother, he waiting for you."

<sup>&</sup>lt;sup>10</sup> Based on the investigation, including other intercepted conversations, "60 piece" refers to a dollar-value, namely \$60, of crack cocaine.

Approximately an hour later, at approximately 2:32 p.m., during a telephone conversation with HOLMES, MOSLEY asked, "Did you ever call that ni\*\*a [Customer-3]?" HOLMES asked, "Huh?" and MOSLEY explained, "I sent that ni\*\*a [Customer-3] to you."<sup>11</sup> HOLMES stated, "What, in the black shit?" and MOSLEY said yes. HOLMES told MOSLEY yes (meaning that he had sold narcotics to Customer-3, whom MOSLEY had directed to HOLMES (his "little brother")).

20. On or about August 9, 2018, at approximately 10:40 p.m., HOLMES called MOSLEY and asked, "You couldn't get in contact with Papa?" (HOLMES was asking MOSLEY if MOSLEY had gotten in touch with EUGENE WILLIAMS.) MOSLEY stated he did not and explained, "My shit was dead man. I'm trying to get that shit right now." (MOSLEY was indicating that he was trying to get additional narcotics.) HOLMES stated, "Slim just called me." (HOLMES was referring to a narcotics customer known to law enforcement.) When MOSLEY asked who, HOLMES repeated "Slim." MOSLEY responded, "Yeah I know. Serve him. YK got some." (MOSLEY was directing HOLMES to sell narcotics to the customer and to get the narcotics from MINOR, whose alias is "YK.")

21. HOLMES also would help to facilitate narcotics transactions on behalf of other Famous Boyz by, for example, helping to secure drug supplies to fulfill customer orders. For example, on or about August 6, 2018, at approximately 11:28 a.m. WEST called MOSLEY and told MOSLEY, "I need some grams bro" (referring to crack cocaine). MOSLEY asked how many, and WEST told him "40." WEST told MOSLEY, "He told me to get it ready and call him back." (Based on the investigation, WEST was referring to a customer who told WEST to call him when WEST had gathered 40 grams of crack cocaine to sell to the customer.) MOSLEY asked, "How long is he gonna be? Cause I gotta go to court cuz and I only got like 20 Yams." (MOSLEY was asking how long WEST had to fulfill the order, because MOSLEY had to go to court and only had 20 grams ready.) WEST told MOSLEY that the customer said to call when WEST was ready, and MOSLEY responded, "I already did it all I have to do is cook it up, I can get that shit." (MOSLEY was telling WEST that he only had to cook a batch of crack cocaine and would be able to fulfill the order.)

22. Several hours later, at approximately 4:18 p.m., HOLMES called MOSLEY and asked, "you got that 40?" (HOLMES was asking if MOSLEY had the 40 grams of crack cocaine ready that WEST had requested earlier in the day.) After MOSLEY and HOLMES spoke over one another for a moment, MOSLEY told HOLMES that he was "about to go get it and whip it up real quick for two seconds for that." (MOSLEY was telling HOLMES that he was about to go prepare the crack cocaine now.) HOLMES asked MOSLEY what he said, and

<sup>&</sup>lt;sup>11</sup> MOSLEY referred to a first name in this conversation that is a shortened version of Customer-3's first name.

MOSLEY explained that he was "about to go, go, go to my house and go do that shit." HOLMES then responded, "Aight." (Based on the investigation, HOLMES was asking MOSLEY if MOSLEY had 40 grams of crack cocaine, and MOSLEY was telling HOLMES that MOSLEY was about to go cook the crack cocaine at his house.)

In addition, on or about August 1, 2018, at approximately 5:58 23. p.m., MOSLEY called HOLMES and requested that HOLMES collect money from others for bricks of heroin that MOSLEY previously had supplied. Specifically, MOSLEY told HOLMES, "If you around ni\*\*as um, see ask them who, who got money on the green ones. Or anyone. You heard? Whatever they got just grab . . . for me. I'm about to get get [U/I] payment. You heard?" HOLMES agreed. MOSLEY further explained, "So just whoever um, whoever got the the, the four, the, the, the organic. You heard?" (Based on the investigation, including controlled purchases of heroin, "Organic" is a greencolored stamp of heroin sold by the Famous Boyz.) HOLMES asked who to collect from, and MOSLEY stated, "Come Up, [co-conspirator 2 ("CC-2")], Torch, and um, and Nasty." (Based on the investigation, "Come Up" is an alias for WEST, "Torch" is an alias for Jones, and "Nasty" is an alias for DAWES.) HOLMES asked, "all three of them" and MOSLEY responded, "All four of them. Remember I gave you four bricks. Remember." HOLMES indicated that he did remember and said he would "grab that[] [w]hat they got."

24. At approximately 7:30 p.m., HOLMES called MOSLEY and stated that "Come Up had 120" (meaning WEST had \$120) but "[t]hat's all who has something." MOSLEY responded, "Aight. Aight."

## Patricio Hernandez, Jonathan Hernandez, and Jonathan Garcia

25. MOSLEY obtained his narcotics supplies, including crack cocaine and cocaine (which MOSLEY would cook into crack cocaine), from various individuals, including Patricio Hernandez ("P. HERNANDEZ"), Jonathan Hernandez ("J. HERNANDEZ"), and Jonathan Garcia, a/k/a "Bebo" ("GARCIA"). Based on the investigation to date, including intercepted conversations and text messages, P. HERNANDEZ, J. HERNANDEZ, and GARCIA often would work together to fulfill orders from MOSLEY.

26. For example, on or about July 31, 2018, between approximately 9:39 a.m. and 12:03 p.m., MOSLEY exchanged a series of text messages with P. HERNANDEZ. During this exchange, MOSLEY asked P. HERNANDEZ, "Ready" and P. HERNANDEZ responded, "Waiting on his ppls to get back." MOSLEY then responded, "Ok bet but need it for today." (MOSLEY was asking P. HERNANDEZ if he had narcotics that he could supply to MOSLEY, and P. HERNANDEZ was indicating that he was waiting to receive the drugs himself before he could give them to MOSLEY. MOSLEY indicated that he understood but told P. HERNANDEZ that he needed the narcotics that day.) At approximately 10:02 a.m., P. HERNANDEZ texted MOSLEY stating, "About 1 hour." Approximately thirty minutes later, at approximately 10:35 a.m., P. HERNANDEZ texted MOSLEY again, stating, "He calling you." Immediately thereafter, at approximately 10:38 a.m., MOSLEY received two text messages from J. HERNANDEZ, stating "yoo" "cam [sic] you meet me close." J. HERNANDEZ and MOSLEY then arranged where to meet.

At approximately 11:20 a.m., MOSLEY received another text 27. message from P. HERNANDEZ, who asked, "You got thru to him." MOSLEY responded, "Touchdown." Shortly thereafter, at approximately 11:51 a.m., MOSLEY sent a text message to P. HERNANDEZ and asked, "So u been losing on da cook too." (MOSLEY was asking if P. HERNANDEZ was losing drug weight when he cooked cocaine into crack cocaine.) P. HERNANDEZ responded, "My boy not that good so I always loose [sic] 2 to 3 out of every [sic] 100." (P. HERNANDEZ was stating that he would lose 2 to 3 grams of drug weight for every 100 grams of cocaine that was cooked into crack cocaine.) MOSLEY responded, "Yeah my too but I might got a 40 g sell but they goin want it hard so let me make sure it's a go." (MOSLEY was indicating that he had a customer who wanted 40 grams of crack cocaine that had already been cooked from soft cocaine powder into hard crack cocaine.) P. HERNANDEZ responded, "I don't have nothing done" (meaning that he only had cocaine to sell and had not cooked it yet into crack cocaine).

28. By way of additional example, on or about August 6, 2018, after the calls from WEST and HOLMES referenced above in which they requested that MOSLEY supply 40 grams of crack cocaine, MOSLEY text messaged P. HERNANDEZ at approximately 4:49 p.m. and stated "my man" (WEST) "need 40[]." P. HERNANDEZ responded, "Ok." Approximately two minutes later, HOLMES called MOSLEY, and MOSLEY asked, "where Come Up at?" (meaning where was WEST). HOLMES put WEST on the phone, and MOSLEY told him, "I am grabbing it right now." (MOSLEY was telling WEST that he was getting the requested amount of crack cocaine.)

29. Approximately one hour later, at approximately 5:27 p.m., J. HERNANDEZ called MOSLEY and asked if MOSLEY was close. MOSLEY responded, "I am counting my money, I just came from court, you heard?" (MOSLEY was indicating that he was counting the money he had to purchase narcotics.) MOSLEY further stated, "And everybody is rushing me so I am doing it right now my boy. You heard?" J. HERNANDEZ responded, "Aight, so wait-- this ni\*\*a-- I don't know, is it 40 or 50 you coming for?" (J. HERNANDEZ was clarifying if MOSLEY wanted to purchase 40 or 50 grams of crack cocaine.) MOSLEY stated that he wanted to purchase 50, and J. HERNANDEZ agreed.

30. Several minutes later, at approximately 5:31 p.m., J. HERNANDEZ called MOSLEY again and told MOSLEY, "When you ready, you think you can

meet me [at a location]? I'ma be in my people's building, in the building where there is no cameras." (J. HERNANDEZ was telling MOSLEY to meet in a location in Newark, New Jersey where they could avoid law enforcement detection.) MOSLEY and J. HERNANDEZ agreed to meet in five minutes.

31. At approximately 5:36 p.m., MOSLEY called GARCIA. During the conversation, GARCIA told MOSLEY, "I am about to see you right now. I am about to go see you real quick, with, with Jonathan." (GARCIA was telling MOSLEY that he was going to be with J. HERNANDEZ when MOSLEY came.)

32. Subsequently, on or about August 9, 2018, at approximately 11:01 p.m., J. HERNANDEZ called MOSLEY and stated, "I just picked up something new but I called [U/I] the shit breaks down easily. It's all broken down." MOSLEY responded, "Yeah," and J. HERNANDEZ continued, "None of it is rock it's all like broken down already." (J. HERNANDEZ was telling MOSLEY that he had picked up a new supply of crack cocaine, but that it was already broken down into smaller, loose pieces.) J. HERNANDEZ told MOSLEY, "You'll take it like that cause I didn't want to hear no complaints. Last time I got a complaint about that." (J. HERNANDEZ was telling MOSLEY that he expected MOSLEY to accept the crack cocaine as-is and that he did not want to hear any subsequent complaints about the condition of the narcotics.)<sup>12</sup> MOSLEY asked, "it's all broken down?" and J. HERNANDEZ answered, "Yeah, as soon as the bird was broken they just turned-- they just all broke." ("Bird" refers to a kilogram of cocaine.) MOSLEY stated, "Yeah but ain't nobody complain." J. HERNANDEZ responded, "No complaints no nothing. It's the same shit." (J. HERNANDEZ was explaining that no one had complained yet and that it was the same source of crack cocaine that J. HERNANDEZ had used previously.) MOSLEY told J. HERNANDEZ to "come on" and J. HERNANDEZ stated, "Aight got you." (MOSLEY was telling J. HERNANDEZ that he was still interested in purchasing the narcotics.) J. HERNANDEZ asked, "50 right?" (confirming that MOSLEY wanted to purchase 50 grams) and MOSLEY stated, "Yeah."

33. On or about August 25, 2018, between approximately 4:01 p.m. and 4:09 p.m., MOSLEY exchanged the following series of text messages with P. HERNANDEZ:

Sender	Message
P. HERNANDEZ	Yooo
MOSLEY	U got hard
P. HERNANDEZ	Yeah
MOSLEY	Ite my guy my need like 150 I'm sell him 10 for sample
P. HERNANDEZ	Ok
MOSLEY	Ite

<sup>&</sup>lt;sup>12</sup> Based on the investigation to date, customers sometimes did not like purchasing "loose" crack cocaine, as opposed to crack cocaine packaged in vials.

MOSLEY	Straight Drop plz
P. HERNANDEZ	Wat i got done it's official I think better the yours lol
MOSLEY	Lol naw big will see
P. HERNANDEZ	Lol we will see
MOSLEY	Ite

34. Based on the investigation, MOSLEY was arranging to purchase 150 grams of crack cocaine from P. HERNANDEZ, and P. HERNANDEZ agreed.

35. On or about August 31, 2018, at approximately 5:58 p.m., MOSLEY sent a text message to J. HERNANDEZ, stating, "Yooo I need 25 soft." (MOSLEY was ordering 25 grams of cocaine.) J. HERNANDEZ responded, "ite give me a few waiting for the car to get back" (meaning that he would fulfill the order but needed a few minutes). Subsequently, at approximately 10:00 p.m., J. HERNANDEZ called MOSLEY. During the conversation, J. HERNANDEZ told MOSLEY, "Hey, yo, Bebo bout to go take that to you, since I'm not able to move around right now." MOSLEY said "Aight, bet. Tell him I want my shit." J. HERNANDEZ, responded, "He already know. He going right to you." (J. HERNANDEZ was telling MOSLEY that "Bebo," a known alias for GARCIA, would be delivering the narcotics MOSLEY ordered.) Approximately five minutes later, GARCIA called MOSLEY and told MOSLEY he was "on my way over there." MOSLEY responded, "Aight."

On or about September 1, 2018, at approximately 2:29 p.m., 36. GARCIA called MOSLEY. During the conversation, GARCIA told MOSLEY, "I'm about to go out, I don't know if probably, about to be tomorrow, what's today? Saturday? Tomorrow or Monday, I'm about to do something. I'm about to come out with some white girl. You will buy that shit from me. I'm about to give it to you for like 28." (GARCIA was telling MOSLEY that he would sell cocaine to MOSLEY for \$28 per gram.) MOSLEY responded, "Hell yeah! Ni\*\*a. You fucking with me ni\*\*a?" (MOSLEY like was expressing an interest in purchasing cocaine from GARCIA at that price.) GARCIA stated, "Aight. I'ma let you know. I'm trying to sell that shit [unintelligible] cause it's a lot of shit. You know what I mean?" MOSLEY responded, "Hell yeah. Hey, you gonna be [unintelligible] that shit off. You heard?" GARCIA stated, "Aight," and MOSLEY added, "I hope we have a sell. So you can just give me like 100 or 200 grams. Feel me?" (MOSLEY was telling GARCIA that he would purchase 100 to 200 grams of cocaine from GARCIA at that price.) GARCIA responded, "Aight." MOSLEY then said, "And I'll knock that shit off. You know that. I'm [unintelligible] fine with that. I'm getting the 40 right now, 35, that shit will go far." (MOSLEY, who sells crack cocaine for \$40 per gram, was saying that he would be able to cook the cocaine into crack and sell it for a profit.)

37. On or about September 17, 2018, at approximately 2:47 p.m., MOSLEY received a telephone call from GARCIA. During the conversation, GARCIA stated, "What's good? Ay, yo, um-- Patricio say you ready for that, with that-- some shit like that." MOSLEY responded, "He say what?" and GARCIA stated, "That you ready for that shit." MOSLEY responded, "Yeah, they got some more of that?" In response, GARCIA stated, "He didn't say nothing about that. He just asked me are you ready with the other shit. Hello?" MOSLEY asked GARCIA to repeat himself, and GARCIA stated, "I say you was ready with the other shit." MOSLEY answered that he "was holding that shit, you feel me?" MOSLEY then asked, "They ain't got no more work though? Hard, nothing?" GARCIA responded, "he didn't say nothing because I need some, too, so he didn't told me nothing, I don't think, but—" and MOSLEY added, "Yeah." (MOSLEY and GARCIA were discussing that they both needed crack cocaine, and MOSLEY asked if P. HERNANDEZ had any narcotics ("work") that he could sell, including crack cocaine ("hard").)

38. GARCIA also would receive narcotics from the Famous Boyz. For example, on or about August 7, 2018, at approximately 6:04 p.m., HOLMES called MOSLEY and stated, "I got uh, five. Five piece for Bebo from Popa" (HOLMES was telling MOSLEY that he had narcotics to supply to GARCIA from EUGENE WILLIAMS). MOSLEY responded, "Aight," and told HOLMES, "I'm going to go." HOLMES stated, "Aight, I'm on 17th." (MOSLEY was arranging to pick up the narcotics from HOLMES and bring them to GARCIA.)

## Jahid Vauters, a/k/a "K" a/k/a "KO"

39. Jahid Vauters, a/k/a "K," a/k/a "KO" ("VAUTERS") supplies narcotics to, and also sells narcotics with, the Famous Boyz. As noted above, law enforcement has conducted approximately three controlled purchases of narcotics from VAUTERS, including purchases of heroin and crack cocaine.

On or about August 13, 2018, at approximately 4:07 p.m., WEST 40. called HOLMES and asked HOLMES whether he was with anyone. HOLMES responded he was with "YK" (referring to MINOR), and WEST asked, "Damn, yo-- you got-- how many bricks you got?" (WEST was asking how many bricks of heroin HOLMES had in his possession.) HOLMES told WEST he probably had one and asked WEST what happened. WEST responded, "I got a five brick sale ni\*\*a" (meaning he had a customer who wanted to buy five bricks of heroin). HOLMES asked, "you hit up Brazy" (meaning had WEST called MOSLEY to supply the heroin) and WEST responded, "This ni\*\*a ain't answering, I'm about to call Papa or KO cause KO's shit be-" (meaning that MOSLEY wasn't answering and that he was going to call WILLIAMS (whose alias is "Papa") or VAUTERS (whose alias is "KO") to supply the heroin). HOLMES also asked, "can I get my one in that shit?" (meaning could WEST sell the brick of heroin HOLMES had as part of the five-brick sale) and WEST responded, "Aight, good look." WEST then explained that he was about to call VAUTERS first before calling MOSLEY because VAUTERS would sell the bricks to WEST for \$130 a brick (implying that VAUTERS would supply heroin at a lower rate than would MOSLEY).

41. Shortly thereafter, at approximately 4:09 p.m., WEST called VAUTERS and stated, "This Come Up, you got some dope?" (WEST was asking VAUTERS if VAUTERS had any heroin.) VAUTERS responded, "Man, but why you be talking like that Come Up." (VAUTERS was reprimanding WEST for speaking so openly about narcotics on the phone.) WEST said, "My bad," and VAUTERS then asked, "what you want?" WEST responded, "Could you front me five, five breeze, five breezies?" (WEST was asking if VAUTERS to give WEST five bricks of heroin without WEST having to pay for them upfront.) WEST stated, "I got a sell ni\*\*a!" and VAUTERS asked, "Oh when I getting my bread back?" (meaning when would WEST repay VAUTERS for the drugs VAUTERS gave him). The call was then disconnected.

42. On or about August 28, 2018, at approximately 8:45 a.m., HOLMES called VAUTERS. During the conversation, HOLMES told VAUTERS, "I need some grams yo" (indicating that he needed narcotics for a sale). VAUTERS asked, "how many you need" and HOLMES said "five." VAUTERS asked if HOLMES needed them right now, and HOLMES said yes. VAUTERS then told HOLMES "aight, I gotcha." (VAUTERS was indicating that he could provide the five grams of narcotics to HOLMES.)

43. On or about September 2, 2018, VAUTERS called MOSLEY and said, "My father's mother wanna get some um-- some, some heroin." MOSLEY responded, "Yeah," and VAUTERS said, "she want 10 though." MOSLEY stated that, "I gotta call my man, my man when you get over here." MOSLEY also asked, "she wanted soft?" and VAUTERS said yes. (MOSLEY was confirming that VAUTERS also wanted cocaine.)

44. On or about September 13, 2018, at approximately 12:32 p.m., HOLMES called VAUTERS. During the conversation, Holmes asked, "Hey yo, what's up with that uh, that coke, you heard?" VAUTERS responded, "I gotta try to get that shit for you." (HOLMES was asking VAUTERS for cocaine to purchase, and VAUTERS was telling HOLMES that he was trying to get some.) HOLMES told VAUTERS, "Everybody talking about there's a drought and shit." VAUTERS asked, "Ain't nobody got none?" and HOLMES stated, "Nobody got shit, I just ran out." (HOLMES was telling VAUTERS that HOLMES and others had run out of their supply of cocaine and were having trouble refilling their supplies.)

45. In addition, law enforcement has seized narcotics and firearms from VAUTERS' residence. Specifically, in or around October 2018, a New Jersey Domestic Violence Civil Complaint and Restraining Order ("TRO") was filed against VAUTERS. The TRO directed that law enforcement search VAUTERS' residence for a handgun, which law enforcement did on or about October 3, 2018. During the search, law enforcement recovered the following items, among other things:

- a. Approximately 430 bundles of suspected heroin marked with various stamps, including "Playboy," "Beast Mode," "High Definition" (law enforcement has purchased heroin marked with each of these stamps from the Famous Boyz during the investigation);
- b. Approximately 147.2 grams of suspected crack cocaine;
- c. One loaded Smith & Wesson Model SW9GVE 9mm caliber firearm, bearing serial number PDB2903; and
- d. One loaded Ruger Model LCR .357 caliber Magnum revolver, bearing serial number 54608627 (collectively, with the firearm in Paragraph 45(c), the "Vauters Firearms").

46. Both of the Vauters Firearms were determined to be stolen out of Virginia prior to VAUTERS's possession of them on or about October 3, 2018. Accordingly, both of the Vauters Firearms had to travel in interstate commerce in order for VAUTERS to have possessed them in New Jersey on or about October 3, 2018.

47. On or about March 31, 2016, VAUTERS was convicted in the Superior Court of New Jersey, Essex County, of Distribution of Controlled Substances on School Property, in violation of N.J.S.A. § 2C:35-7, a crime punishable by imprisonment for a term exceeding one year.

## Eugene Williams, a/k/a "Popa, a/k/a "Papa"

48. Eugene Williams, a/k/a "Popa," a/k/a "Papa" ("WILLIAMS" or "EUGENE WILLIAMS") is involved in the distribution of both heroin and crack cocaine with the Famous Boyz.

49. On or about August 2, 2018, at approximately 8:43 p.m., MOSLEY called WILLIAMS. During the conversation, MOSLEY asked WILLIAMS, "where them cookies at? I need them shits." (MOSLEY was asking WILLIAMS where the containers of crack cocaine were that MOSLEY previously had given to WILLIAMS.) WILLIAMS asked, "the 50 you just gave me?" and MOSLEY said yes. WILLIAMS stated, "I got like maybe 10, 15 left." (WILLIAMS was stating that he only had 10 to 15 containers remaining of the 50 MOSLEY had originally provided to WILLIAMS).

50. On or about August 4, 2018, at approximately 7:59 p.m., HOLMES called MOSLEY. During the conversation, MOSLEY stated, "Ayo, Papa said whoever got brown dope and it's a brick—" (referring to a discussion MOSLEY had with WILLIAMS about a brick of heroin). Before MOSLEY could finish, HOLMES responded, "Nah, we sold them, we sold them." MOSLEY said "Aight."

51. On or about August 6, 2018, at approximately 7:42 p.m., WILLIAMS called MOSLEY and asked, "You save me what I asked you to?" MOSLEY responded, "Say what?" WILLIAMS then stated, "Uh—'powder'?" MOSLEY answered, "Yeah I got 'powder' [U/I]." WILLIAMS then stated that he was about to come see MOSLEY. (WILLIAMS was asking if MOSLEY had some cocaine that WILLIAMS previously had asked MOSLEY for, and MOSLEY responded that he did.) Later that day, at approximately 8:25 p.m., WILLIAMS called MOSLEY again and said, "Fucking my boy man they want fucking crack shit man" (meaning his customer wanted to buy crack cocaine not powder cocaine).

52. On or about August 13, 2018, at approximately 6:58 p.m., HOLMES called MOSLEY. During the conversation, MOSLEY told HOLMES, "Papa said you had 200 for me." HOLMES responded, "What the fuck you talking about?" and MOSLEY said, "That's what Papa said." HOLMES stated, "nah he's-- what?" MOSLEY asked, "What the fuck he was talking about?" HOLMES replied, "Nah he-- he said uh, that you talking about for them bricks, for the bricks he gave me." MOSLEY said, "yeah," and HOLMES stated, "Oh nah, I ain't finished, cause I did him. I gave him something." MOSLEY responded, "he's a dumb ass," and HOLMES stated, "Nah, I, I [chuckles] what the fuck? I told him I ain't finished with it. I am like, but I'ma get, I'ma give him, I'ma get him out of the way with that, with a brick." (MOSLEY was stating that WILLIAMS had told MOSLEY that HOLMES had \$200 dollars for MOSLEY. HOLMES, however, said he did not and explained that WILLIAMS probably was referring to the cost of bricks of heroin that WILLIAMS gave HOLMES.)

53. WILLIAMS and MOSLEY also discussed that WILLIAMS frequently changed his phone, to avoid law enforcement detection. Specifically, on or about August 9, 2018, at approximately 10:56 a.m., WILLIAMS called MOSLEY. During the conversation, MOSLEY appeared to be confused about who he was speaking with. After WILLIAMS stated, "Man, you don't know who you talking to," WILLIAMS clarified by providing his nickname, "P O P A." MOSLEY then explained his confusion, stating, "Nah, 'cause the um, the other ni\*\*a do that shit too. You heard?" WILLIAMS asked, "What, change his number and shit?" MOSLEY responded, "Yeah. He do that shit like every fucking three weeks. That shit be like, peace. And the same way you just text. You heard?"

54. Later that day, at approximately 2:02 p.m., WILLIAMS called MOSLEY. During the conversation, WILLIAMS told MOSLEY, "What you doin', bruh? We gotta get some work still, man. I'm trying to get some work today man" (referring to the need to get narcotics to sell). MOSLEY responded, "For what?" and WILLIAMS said, "From [U/I]." MOSLEY said, "Oh, aight." WILLIAMS then asked, "Ey, yo, you like that Gorilla, right? Um, Godzilla?" (WILLIAMS was referring to heroin stamps and asking whether MOSLEY approved of the quality of heroin marked with the stamp "Godzilla," a stamp known to be sold by the Famous Boyz.) MOSLEY responded, "Yeah, I got that." WILLIAMS asked, "You like that shit, right?" and MOSLEY said, "It's aight." WILLIAMS then asked, "People like that shit?" and MOSLEY responded, "Yeah, they like it." (WILLIAMS was asking if customers had reported liking the quality of the heroin stamped "Godzilla," and MOSLEY said that they did.) WILLIAMS also asked, "What name you got?" (meaning what other brands of heroin MOSLEY had) and MOSLEY responded, "I got Second to None" (referring to heroin marked with this stamp). WILLIAMS said, "Damn, man! We both got the same shit." MOSLEY responded, "Duh! He gave us all the bull shit." (MOSLEY was indicating that he and WILLIAMS had both received their heroin supply from the same individual.)

## Angelo West, a/k/a "Come Up"

55. Angelo West, a/k/a "Come Up" ("WEST") distributes both heroin and crack cocaine. As noted above, law enforcement has conducted approximately eight controlled purchases of narcotics from WEST, including purchases of heroin and crack cocaine. Furthermore, as described below, WEST also has possessed at least one firearm in furtherance of his drugtrafficking activity.

56. Based on the investigation to date, WEST received his drug supply, and sometimes his drug sales, from both MOSLEY and VAUTERS. For example, on or about August 4, 2018, at approximately 11:49 a.m., WEST called MOSLEY and said, "Yo, send me some sales, yo." (WEST was asking MOSLEY to direct narcotics sales to him.) WEST further stated, "I need some [U/I] shit dried up over here." MOSLEY responded, "Hell yeah" and said that WEST and another individual had "banged all that loose." (MOSLEY was referring to the sale of loose crack cocaine by WEST.) WEST told MOSLEY there was "nobody out here" and that "[t]hey don't like that loose shit." (WEST was telling MOSLEY that the customers didn't like the loose crack cocaine.)

57. Shortly thereafter, at approximately 11:54 a.m., WEST called MOSLEY again and asked, "Hey yo, you got some nickels?" (WEST was asking MOSLEY for \$5 containers of crack cocaine.) MOSLEY said, "Nah, I ain't got no nickels. I don't even got no coke. I gotta buy some." (MOSLEY was stating that he had neither crack cocaine nor powder cocaine and had to get new supply.) WEST then told MOSLEY that he only had "Diesel" (meaning heroin) and MOSLEY asked, "You ain't got no uh, money for no coke?" (MOSLEY was asking if WEST had money to buy more cocaine.) WEST responded, "I got this Diesel. I gotta sell this dope first, on the set, I got like two bundles of Organic—" (WEST was telling MOSLEY that he still had two bundles of heroin stamped "Organic" to sell.) MOSLEY responded, "I gotta to sell, a sale just hit me on [U/I] but he ain't, he said he about to get some money." WEST stated, "I got like four bundles of DEBO" so when I sell that shit, I'ma have the money for [U/I]." MOSLEY said, "Aight, I got you." (MOSLEY and WEST were planning to use proceeds from narcotics sales to purchase additional cocaine.)

58. On or about August 4, 2018, at approximately 12:30 p.m., MOSLEY called WEST and said, "Yo my man said in a half an hour he gonna need eight bags" (referring to a sale of eight bags of heroin). WEST confirmed the time and responded, "Aight, bet" (indicating that he could sell the heroin to the customer).

59. On or about August 22, 2018, at approximately 6:36 p.m., VAUTERS called WEST and asked, "What you need?" WEST said, "I need some, ain't nothing out here." VAUTERS responded, "Oh, but I only got um, D, bro." (WEST was asking VAUTERS for a supply of narcotics, and VAUTERS was saying that he only had heroin (sometimes referred to in slang as "diesel").) The conversation continued, and WEST asked, "You want to front or you all buy?" (meaning would VAUTERS front WEST the drugs). VAUTERS said that it "depends on what you trying to do." WEST responded, "I'm saying, buy one, front one." VAUTERS agreed, and WEST confirmed, "1-3-0?" (confirming that the price of a brick of heroin would be \$130). VAUTERS confirmed the price.

# Quaheem Bethea, a/k/a "Troub"

60. Quaheem Bethea, a/k/a "Troub" ("BETHEA") has distributed heroin with the Famous Boyz. Moreover, although BETHEA has been incarcerated since in or around June 2018, the investigation has revealed that he has remained an active and ongoing participant in the conspiracy, including by requesting that other members of the Famous Boyz continue to supply his customers while he is incarcerated. Moreover, based on the investigation to date, even while incarcerated, BETHEA has continued to receive narcotics from the Famous Boyz and to sell narcotics on behalf of the Famous Boyz to other incarcerated inmates.

61. As noted above, law enforcement has conducted approximately five controlled purchases of heroin from BETHEA.

62. For example, on or about August 4, 2018, at approximately 1:29 p.m., BETHEA called MOSLEY. During the conversation, MOSLEY said that he and HOLMES had put something together for BETHEA and that "Karen" (referring to ARMSTRONG) would bring it to BETHEA the next day. In particular, MOSLEY said that they "gonna put some 'ercs' and some backup and put a little bit of Bally in there for you" (referring to Percocet and weed). BETHEA then lamented that this summer, he was going to "take off" and said that "bro just start fucking with me on the bricks, you feel me?" (BETHEA was stating that he had just started to sell multiple bricks of heroin and had planned to pick up his narcotics trafficking activity had he not been incarcerated.)

63. On or about August 12, 2018, at approximately 9:27 p.m., WEST received a call from BETHEA. BETHEA told WEST to tell MOSLEY ("Breezy") and HOLMES ("Dot") "I got them pieces and shit, you heard?" (referring to narcotics that MOSLEY and HOLMES had provided to BETHEA in jail). BETHEA stated, "Yo, just tell them like, you running up in here everything in Western Union, way more money-- on the set. Like [U/I] trippin', you heard? You heard, my boy? Huh, Angelo?" WEST asked BETHEA to repeat himself, and BETHEA stated, "Tell 'em, [U/I] start traveling, like everything going for triple, so you could get Western Union." (BETHEA was explaining that prices for drugs were three times higher in jail than on the street, and that he could wire drug proceeds to MOSLEY and HOLMES via Western Union.)

64. The conversation continued, and WEST stated, "Only way you gonna eat is, if you got white white." (WEST was referring to making money from selling to white customers.) WEST further stated, "You know who be coming through for me?" and explained that a narcotics customer had come to see him. BETHEA asked, "My white boy?" and WEST confirmed, "Yeah, from New York." BETHEA told WEST, "I want my bands back when I come home, too" and WEST responded, "You could have him. We got shit, that ni\*\*a cool as hell, on the hat. This ni\*\*a, we be doing what you did, 225 for a brick." (BETHEA was telling WEST that he wanted his customer back when he got out of jail, and WEST agreed, telling BETHEA that the customer was now buying heroin for \$225 a brick.)

65. On or about August 17, 2018, at approximately 6:14 p.m., BETHEA called WEST and told him, "A [U/I] 50 dollars bro. A [U/I] bananas was 30 dollars bro. I got 30 dollars' worth of food. Per pill for every one. I didn't even order this week my nigga on the set like." (BETHEA was referring to his continued sale of narcotics while incarcerated.)

## David Lamar, a/k/a "Brazy Ru"

66. David Lamar, a/k/a "Brazy Ru" ("LAMAR") distributes crack cocaine, which he often obtains from MOSLEY. LAMAR also has displayed his affiliation with the Famous Boyz via social media.

67. For example, on or about August 5, 2018, at approximately 10:12 p.m., LAMAR called MOSLEY and asked, "Yo, you got some sauce?" MOSLEY said, "Nah," and LAMAR asked, "You got hard, right?" MOSLEY said that he did. (LAMAR was asking MOSLEY to supply him with crack cocaine). LAMAR responded, "I'm about to try you. I got 380" (referring to the amount of money he had to spend). The conversation continued, and LAMAR stated, "Ey, put 10 together right now I'm on my way." MOSLEY said, "Aight." (LAMAR was purchasing crack cocaine from MOSLEY at a price of \$38 per gram.)

68. On or about August 7, 2018, at approximately 3:51 p.m., LAMAR called MOSLEY and asked, "Can you deliver it to me?" MOSLEY asked where LAMAR was, and then later asked "What's the number?" LAMAR responded, "Give me 10 and next time I'll get the 20 [U/I] I'll get the 10 now. If I get the 20 now, it's gonna leave me with like 100 dollars' worth." MOSLEY responded, "That shit don't mean nothing" and added, "It's all about the big paper." LAMAR laughed and said, "You trying to gas me up." MOSLEY responded, "For real, it'll look better, you gonna be like, see. [U/I] you know I be selling them shits so. [U/I] you on some bullshit." LAMAR then stated, "Aight, aight. Look, look" "bring me 15." MOSLEY said "Aight," and LAMAR stated, "That's 600." (MOSLEY and LAMAR were discussing the price at which MOSLEY would supply crack cocaine to LAMAR. MOSLEY ultimately agreed to supply the crack cocaine at a price of \$40 per gram (15 grams at \$40 per gram, for a total of \$600).)

69. Shortly thereafter, at approximately 4:10 p.m., LAMAR called MOSLEY again. During the conversation, MOSLEY stated, "Yeah I think you gotta spend 640 cuz, I got 16." (MOSLEY was telling LAMAR he had to buy an extra gram of crack cocaine.) MOSLEY further stated, "I got 16, you want me to take the 16 off my ass so I can bust the move. You hear me? Nah really, real talk, I got 16." (MOSLEY was explaining that LAMAR had to buy 16, not 15, grams of crack cocaine.) LAMAR agreed, and MOSLEY said he would go grab it at his house.

70. On or about August 13, 2018, at approximately 11:10 a.m., LAMAR called MOSLEY and asked where MOSLEY was. MOSLEY responded that he was "waiting for ni\*\*as to finish cuz." LAMAR asked how many grams MOSLEY had left (referring to crack cocaine) and MOSLEY said he had none.

MOSLEY and LAMAR also had conversations about how to cook 71. cocaine into crack cocaine. For example, on or about August 26, 2018, at approximately 8:06 p.m., LAMAR called MOSLEY and asked, "How do I make it hard?" MOSLEY asked, "What?" and LAMAR stated, "How do I make it completely hard? [U/I] smack." The conversation continued, and LAMAR asked again, "Right, is not getting completely hard, why?" MOSLEY explained, "You ain't let it cook." LAMAR asked MOSLEY to explain, and MOSLEY stated, "You ain't let it cook long enough." LAMAR asked, "So what just cook it back?" and MOSLEY responded, "Yeah just let it cook, you said it ain't getting hard?" LAMAR answered, "Is gooey, but it's not like staying completely hard." MOSLEY then stated, "Aight—you gotta motherfucking put it back in there. You got new baking soda?" LAMAR said that he had some "at the crib," and MOSLEY said, "You gotta get some new baking soda." LAMAR asked if it was the baking soda that was causing the problem (with the cocaine not cooking up into hard crack cocaine) and MOSLEY said, "it's old, the baking soda is not locking up."

## Ibn Saadiq, a/k/a "Zero"

72. Ibn Saadiq, a/k/a "Zero" ("SAADIQ") distributes heroin and crack cocaine with the Famous Boyz. As noted above, law enforcement has conducted approximately three controlled purchase of heroin from SAADIQ.

73. On or about September 19, 2018, at approximately 5:48 p.m., a known narcotics customer called MOSLEY and said, "Yo I'm here" and placed an order with MOSLEY for "14" (14 bags of heroin). Immediately thereafter, at approximately 5:48 p.m., MOSLEY called SAADIQ and said "Yo, they right there." SAADIQ responded, "They where?" and MOSLEY stated, "In the back, on 19th." SAADIQ said, "Oh, a'igh. I ain't back there. I'm in the car." MOSLEY then stated, "Ni\*\*a, the sale! You drunk as hell." When MOSLEY repeated "the sale," SAADIQ then stated, "Oh a'igh. Aight. I'm coming. I'm coming." SAADIQ then called MOSLEY back several minutes later to confirm what car the customer was in. (During these calls, MOSLEY was directing SAADIQ to sell the customer heroin.)

74. On or about September 22, 2018, at approximately 1:04 p.m., HOLMES received a call from SAADIQ. During the call, SAADIQ told HOLMES, "Yo, somebody right here waiting for you on 18th, right here. There's somebody is waiting for you" (referring to a narcotics customer). The conversation continued, and HOLMES stated, "Tell him there ain't no more cook up" (referring to the fact that they didn't have any more crack cocaine to sell at that time). SAADIQ responded, "Aight."

75. SAADIQ also warned MOSLEY about law enforcement presence in the South 15th Avenue/18th Street Area. Specifically, on or about September 24, 2018, at approximately 8:39 p.m., SAADIQ called MOSLEY and stated, "A black Crown Vic headed that way, yo." MOSLEY asked which way the car was coming, and SAADIQ said it was "coming down 19th." (SAADIQ was warning MOSLEY about the police to help MOSLEY avoid arrest.)

## Malik Minor, a/k/a "YK"

76. Malik Minor, a/k/a "YK" ("MINOR") distributes heroin and crack cocaine with the Famous Boyz. As noted above, law enforcement had conducted approximately five controlled purchases of narcotics from MINOR, including purchases of heroin and crack cocaine.

77. On or about September 3, 2018, at approximately 1:58 p.m., HOLMES called MOSLEY. During the conversation, MOSLEY asked, "Fuck y'all doing?" HOLMES responded, "Hmm? Oh, nah, my phone was charging." MOSLEY stated, "Yo, the white guy right there he want, um—tell YK he want four Rocky and then somebody... somebody give him eight bags and two nickels." (MOSLEY was directing HOLMES to have MINOR sell eight bags of heroin and two \$5 vials of crack cocaine to a customer.) HOLMES responded, "Aight."

78. Later that day, at approximately 6:22 p.m., MOSLEY called HOLMES. During the conversation, HOLMES explained that someone called him, and MOSLEY stated, "Hell no. I called you. That's my sale, you gotta give me 80 do—[.]" (MOSLEY was telling HOLMES that HOLMES owed MOSLEY money because MOSLEY had referred a drug sale to HOLMES.) HOLMES insisted that the customer had reached out to HOLMES and stated, "I'll just show you the text message on the set. And I called, I called YK and I told YK on the set, asks YK. I gave the money to YK. I picked YK up." (HOLMES was stating that he gave the money from the sale to MINOR.) MOSLEY then responded, "YK talking about you said it's a random ni\*\*a. That's my sale, I sent him. It ain't no random ni\*\*a. It's my sale. Just so you know." (MOSLEY was stating that he had already talked to MINOR about the transaction and was reiterating that the customer was sent by MOSLEY.)

79. On or about September 9, 2018, at approximately 6:03 p.m., a coconspirator ("CC-8") called MOSLEY. During the conversation, CC-8 told MOSLEY, "I don't got no hard son" (indicating he had run out of crack cocaine to sell). MOSLEY asked if CC-8 wanted MOSLEY to "bring it down." MOSLEY also asked, "How many bundles you got left?" (meaning how much heroin did CC-8 have). CC-8 responded, "I got tw—YK got the other two, I sold one 'em." (CC-8 was stating that MINOR had two bundles of heroin left, and CC-8 had sold one bundle.)

## Omar Jones, a/k/a "Torch"

80. Omar Jones, a/k/a "Torch" ("JONES") distributes narcotics, including heroin. JONES often obtains narcotics from MOSLEY and conducts narcotics transactions at the direction of MOSLEY. In addition, as described below, JONES also has been pictured in multiple images posted on social media with other members of the Famous Boyz in posts regarding the gang and the gang's criminal activities, including narcotics trafficking, firearms possession, and posts intended to threaten rival gang members.

81. For example, on or about August 10, 2018, JONES sold heroin at the direction of MOSLEY. Specifically, on or about August 10, 2018, at approximately 7:08 p.m., MOSLEY called JONES and asked where he was. JONES explained he was getting a haircut, and MOSLEY asked where HOLMES was. JONES said that HOLMES was with him, and MOSLEY asked, "Who in the hood? I got a nat sale." (MOSLEY was telling JONES that he had a drug sale arranged.) When JONES stated that everyone was at the barbershop, MOSLEY responded, "Oh who out there? Nobody?" JONES replied, "uh" and asked "what they want?" (JONES was asking what the narcotics customer wanted to buy.) MOSLEY responded, "a brick" (meaning a

brick of heroin). In an aside, JONES stated, "Hey Dot" (speaking to HOLMES) "it's a brick." MOSLEY then said, "Yeah, my man want a nat. Yo, give him that 'Mechanic' shit. Bro, get that shit off. Just give it to him. He about to pull up right there." (MOSLEY was directing JONES to sell or have someone sell the customer heroin marked with the stamp "Mechanic," which is a stamp that the investigation has revealed MOSLEY and the Famous Boyz sell.) JONES asked where, and MOSLEY said "On 19th." MOSLEY then asked, "Where you want me to say? You got it on you? You don't even got it on you." (MOSLEY was asking where MOSLEY should tell the customer to go and was asking if JONES had the supply of heroin on his person.) Jones responded, "Nah, I'm saying. I don't got that 'mechanic' shit on me" (meaning that he did not have heroin stamped "Mechanic" with him). Mosley asked, "you say what?" and Jones answered, "I'm saying, I could go get that shit." The conversation contined, and Mosley asked, "What you got on you?" Jones replied, "Uh-- I got the 'D' but 15 of them shits and I go-- no, I think I do got [audio interruption] I got like three different shits on me." (JONES was explaining that he had heroin with three different stamps in his possession.) Mosley told Jones, "Aight. Give that ni\*\*a a brick, man," and Jones said, "Aight, say that."

82. Several minutes later, at approximately 7:14 p.m., MOSLEY received a call from a customer ("Customer-4"). MOSLEY and Customer-4 spoke about where Customer-4 was, and MOSLEY then told Customer-4, "Aight, aight stay right there. He's about to come to you. You heard?" (MOSLEY was telling Customer-4 that JONES was about to come sell drugs to Customer-4.)

83. In addition, JONES also operated MOSLEY's car with MOSLEY's supply of narcotics. Specifically, on or about August 7, 2018, law enforcement conducted a motor vehicle stop of a 2003 Acura TL (the "Acura") that law enforcement previously had seen MOSLEY driving in furtherance of narcotics-trafficking activity. Subsequent investigation revealed that JONES, who had been sitting in the driver's seat of the Acura, was in possession of approximately 32 glassine envelopes of heroin. During the stop, law enforcement also found two plastic vials of suspected crack cocaine in the Acura. HOLMES was a passenger in the Acura, but JONES claimed ownership of the narcotics in the car and was arrested. The Acura was towed for further investigation. A subsequent search revealed one brick of heroin stamped "Total Control" (a stamp known to be sold by MOSLEY and the Famous Boyz) and one small bag containing approximately 25 small containers of suspected crack cocaine that were stored in the trunk of the Acura.

84. On or about August 7, 2018, at approximately 9:12 p.m., MOSLEY received a call from a woman ("Individual-2"). MOSLEY told Individual-2, "They pulled up booked the homies. Know what I mean?" MOSLEY further explained, "They had pulled up on my shit booked the homies, you heard? On the shit." (MOSLEY was stating that police had pulled over his car and had

arrested the occupants.) Individual-2 said "Yeah?" and MOSLEY responded, "Word. J-Dot and um Torch" (referring to HOLMES and JONES).

85. On or about August 9, 2018, at approximately 9:25 a.m, a woman ("Individual-3") called MOSLEY. During the telephone conversation, Individual-3 asked where MOSLEY was and stated, "I'm about to come 'cause that shit's due, I gotta pay you." MOSLEY responded, "Said what? Oh, you gotta wait, I just [U/I]. I ain't got no car, they took my car. They took my car with my drugs, everything in there." Individual-3 asked, "Where your car at?" and MOSLEY explained, "They towed it, the police towed it with my drugs in the car." (Based on the investigation, it is MOSLEY was telling Individual-3 that his car had been towed by police on or about August 7, 2018, and that he had narcotics stored inside it.)

86. MOSLEY also warned JONES about police activity, to help JONES avoid detection and arrest. Specifically, on or about August 10, 2018, at approximately 8:48 p.m., while a number of the Famous Boyz were on their way to a party, JONES called MOSLEY. During the conversation, MOSLEY told JONES to "watch out how ya ni\*\*as pull up" because "they" were watching. Jones asked, "the boys?" (referring to the police) and MOSLEY responded, "Yeah, but not the regular ones. The other ni\*\*as, you heard?-- Them letter ni\*\*as, you know what I mean?" (MOSLEY was referring to the presence of suspected federal, as opposed to local, law enforcement.)

## Saeed Dawes, a/k/a Nasty

87. Based on the investigation to date, Saeed Dawes, a/k/a "Nasty" ("DAWES") regularly was involved in packaging crack cocaine for distribution for the Famous Boyz and in selling both crack cocaine and heroin. DAWES also has been pictured in multiple images posted on social media with other members of the Famous Boyz in posts regarding the gang and the gang's criminal activities, including narcotics trafficking, firearms possession, and posts intended to threaten rival gang members.

88. For example, on or about August 5, 2018, at approximately 1:41 p.m., MOSLEY called DAWES and asked "Where them bundles at, yo?" (MOSLEY was asking DAWES where he found find bundles of heroin.) DAWES responded, "Them shits, them shits in the house." MOSLEY asked where DAWES was, and DAWES stated, "I'm in the house." MOSLEY stated, "Aight. Aight. I'm about to come get them shit." DAWES then clarified, "Aight. Nah, they, they at the house with [another individual] and them--- I don't got them at the house." (DAWES was clarifying in which house the heroin was stored.) The conversation continued, and MOSLEY directed DAWES, "Call [the other individual] and tell him [U/I] outside. Who in there? Call somebody in there them him [audio fades]." DAWES responded, "Aight." (MOSLEY was telling DAWES to call other co-conspirators to let them know MOSLEY was coming to pick up heroin, and DAWES agreed.)

89. As an additional example, on or about August 13, 2018, at approximately 8:44 p.m., WEST called DAWES and told DAWES, "Yo, tell J-Dot to come downstairs. Or get a cookie and come over here then." (WEST was telling DAWES to have HOLMES to get crack cocaine (a "cookie") and meet WEST.) DAWES agreed.

90. Moreover, as described above, on or about August 1, 2018, MOSLEY directed HOLMES to collect money for bricks of heroin from, among others, DAWES and JONES.

#### Karen Armstrong

91. Karen Armstrong ("ARMSTRONG") is involved in the distribution of narcotics, including heroin, crack cocaine, and prescription narcotics, with the Famous Boyz. ARMSTRONG also is involved in smuggling narcotics to BETHEA while BETHEA is incarcerated.

On or about August 15, 2018, at approximately 10:42 a.m., 92. ARMSTRONG called MOSLEY and asked if MOSLEY had "girl scout cookies" and Mosley said "nope." ARMSTRONG asked, "Not even 'floppys'?" and MOSLEY responded, "No. I don't got nothing." (ARMSTRONG was asking if MOSLEY had any drugs, and MOSLEY said he didn't.) ARMSTRONG responded, "Oh, my god, son," and MOSLEY stated, "Like six people just called me back to back." (MOSLEY was saying that multiple people had just called him looking for narcotics.) ARMSTRONG stated, "You fucking up the churches money, bro," and Mosley chuckled. ARMSTRONG said, "I thought you was the plug like," (meaning that she thought MOSLEY was the drug supplier) and MOSLEY started to say, "I been telling people -- " ARMSTRONG then said, "You fell off. You making us look bad, bro." MOSLEY asked, "Huh?" and ARMSTRONG said, "You making us look bad, bro. You can't cover these orders." (ARMSTRONG was complaining that they couldn't cover orders for drugs from customers.) Mosley responded, "Yeah, man shit all crazy."

93. On or about August 19, 2018, at approximately 10:20 a.m., ARMSTRONG called MOSLEY and told him, "they towed my car."<sup>13</sup> ARMSTRONG also told MOSLEY that the car had "all the work in it" (referring to narcotics).

94. The following day, on or about August 20, 2018, at approximately 11:09 a.m., ARMSTRONG called MOSLEY and stated, "I'm out here with no car,

<sup>&</sup>lt;sup>13</sup> Further investigation revealed that ARMSTRONG had been in an accident and her car had been towed.

no nothing." MOSLEY said, "Shit, me, too," and ARMSTRONG added, "And drugs, like." ARMSTRONG further stated, "I'm keeping my shit on me. I don't want to hear nothing about somebody hit nothing up." (ARMSTRONG was stating that she was keeping her supply of narcotics on her person.) ARMSTRONG stated, "I only brought like 300 dollars' worth anyway" (referring to \$300 of narcotics).

95. On or about August 24, 2018, at approximately 9:21 a.m., ARMSTRONG called MOSLEY. During the conversation, ARMSTRONG asked, "So nothing is bagged right?" MOSLEY asked what, and ARMSTRONG said, "Girl?" (ARMSTRONG was asking if any crack cocaine was bagged up for distribution.) MOSLEY responded, "I'm saying I ain't got nothing hard, I ain't— I called, I called the ni\*\*a [U/I] and shit and then he text me last night talking about that he had to go to Connecticut and shit." (MOSLEY was telling ARMSTRONG that he didn't have any crack cocaine and that he had been trying to reach his supplier.) ARMSTRONG told MOSLEY, "We need a second um, outlet" (referring to the need to get a new supplier).

96. On or about September 6, 2018, at approximately 10:05 a.m., ARMSTRONG called MOSLEY. During the conversation, MOSLEY stated, "I just left the [U/I.]" ARMSTRONG asked, "Oh, that shit [U/I] down there?" MOSLEY responded, "I'm saying, Goldfinger. You got Goldfinger?" (MOSLEY was asking ARMSTRONG if she had any heroin stamped Goldfinger, a stamp known to be sold by the Famous Boyz.) ARMSTRONG responded, "That's all I got, ni\*\*a." MOSLEY asked, "Yeah, you wanna rock out?" and ARMSTRONG responded, "Yeah, I only got 3 whole ones" (referring to three bricks of heroin).

#### Robert Dorrah, a/k/a "Cash Out"

97. Robert Dorrah, a/k/a "Cash Out" ("DORRAH") distributes heroin, which he often receives from MOSLEY.

98. For example, on or about July 31, 2018, at approximately 3:41 p.m., MOSLEY called DORRAH. During the conversation, DORRAH told MOSLEY "I might need you in like at least an hour with one of those that you gave me before." MOSLEY said, "Aight," and DORRAH asked, "so can you just carry one on you?" MOSLEY responded, "You know I don't do that way no more." DORRAH stated, "Aight you gonna go get it though for me when I call you?" MOSLEY said yes. DORRAH asked "how many of them shits you got left," and MOSLEY answered, "[U/I] doing all that but--" DORRAH asked if Mosley had them "on deck" and MOSLEY said "is aight for you." DORRAH said he "might need to get like a couple probably." MOSLEY told UM alright and to let MOSLEY know in advance. (DORRAH was asking MOSLEY to supply him with narcotics.) 99. Shortly thereafter, at approximately 4:05 p.m., DORRAH called MOSLEY and stated, "I just tried to sell a brick but I bust that shit open, that shit wet yo." (DORRAH was complaining that the brick of heroin he just tried to sell was wet.) MOSLEY questioned DORRAH, and DORRAH said "Like that brick wet like all them bags is wet." MOSLEY responded, "ni\*\*a I gave you that shit dry ni\*\*a, what you talking about?" (MOSLEY was stating that the heroin was dry when he gave it to DORRAH.) DORRAH said again that the "shit was wet though, as soon as I opened it that shit was wet like as soon as I cracked it, it was wet. I just tried to sell a brick to my man, I was gonna do a quick flip, you feel me? And that shit was wet." MOSLEY responded, "Aight bro. [U/I] it wasn't wet when I gave it to you. You know?"

100. In addition, on or about August 2, 2018, at approximately 4:29 p.m., DORRAH called MOSLEY and stated, "I need you to go get me one of them things." MOSLEY said he didn't have any on him, and DORRAH stated, "Alright I'm about to come to the hood and get it. What's the stamp?" MOSLEY said he thought it was "Total Recall" but it was "all mixed up." DORRAH asked, "You don't got no DEBO or nothing like that?" MOSLEY's response was unintelligible. (MOSLEY and DORRAH were discussing stamps of heroin that MOSLEY could supply to DORRAH.)

101. On or about August 3, 2018, at approximately 4:07 p.m., DORRAH called MOSLEY and stated, "Ayo, I flushed that shit what, what, other names you got?" (DORRAH was stating that he had sold his supply of heroin and was asking MOSLEY what other stamps MOSLEY had.) MOSLEY responded, "I got some shit called um, Foxy." DORRAH asked if MOSLEY had any "Exotic" and MOSLEY said he didn't. DORRAH said, "You said Foxy?" and then asked "How much is that shit?" MOSLEY responded, "160." DORRAH stated, "Aight, aight I'ma call you right back." (MOSLEY was telling DORRAH he would sell him a brick of heroin stamped "Foxy" for \$160.)

## **Sharing Guns**

## August 2, 2018 Gun Arrest

102. On or about August 2, 2018, at approximately 10:05 p.m., local law enforcement, acting in coordination with federal law enforcement, conducted a motor vehicle stop of a car being driven by WILLIAMS. During the stop, law enforcement determined that one of the rear passengers of the vehicle, Co-Conspirator-5 ("CC-5") was in possession of a firearm, namely, a Glock Model 23 .40 caliber firearm, bearing serial number KDW609. WEST, DORRAH, and Co-Conspirator-6 ("CC-6") also were in the vehicle. CC-5 was arrested, and police towed the vehicle.

103. At approximately 10:50 p.m., WEST received a call from BETHEA. BETHEA asked WEST what took him so long to answer his phone, and WEST

responded, "Ni\*\*as just got caught with the strap bro" (referring to the recovered firearm). BETHEA asked who got caught, and WEST said CC-5. WEST then told BETHEA that the firearm was his and that CC-5 was holding it for him: "[T]he strap was already in her cag cause when we was in the hood there wasn't no 'coppies' out there. The [U/I] ni\*\*as riding around in the Jeep Cherokee. You heard. So I had it out there with me, but I had it in [CC-5]'s bag. Then papa pulled up you heard?" (WEST was explaining that he had the gun with him while he was outside because he hadn't noticed the law enforcement officers in an undercover car and that he had CC-5 hold it in CC-5's bag.)

104. At approximately 11:54 p.m., MOSLEY called CC-6. During the telephone conversation, MOSLEY greeted CC-6 and asked, "What up?" CC-6 responded, "never mind now," and MOSLEY asked what happened. CC-6 told MOSLEY, "[t]hat [CC-5] man," and MOSLEY stated, "Yeah she got bagged." CC-6 said, "yeah," and MOSLEY asked, "[i]s it [a] grip?" CC-6 responded, "[y]eah." MOSLEY then asked, "I know, and they took Papa [i.e., EUGENE WILLIAMS car and everything?" to which CC-6 responded, "[y]eah." MOSLEY asked if GRIMSLEY "was with them," and CC-6 confirmed that he was. (Based on the investigation, MOSLEY and CC-6 were discussing CC-5's arrest for a firearm (a "grip") in WILLIAMS's vehicle.)

105. Shortly thereafter, at approximately 11:57 p.m., WILLIAMS called MOSLEY. During the conversation, MOSLEY told WILLIAMS, "Yo, the money they about to flip that shit." (MOSLEY was referring to WILLIAMS's car being searched by law enforcement.) WILLIAMS responded, "Yo what about the motherfucking what do you call it?" MOSLEY asked WILLIAMS, "What?" and WILLIAMS stated, "The hood." MOSLEY asked, "You said the hood what?" and WILLIAMS responded, "Under the hood ni\*\*a." After clarifying again, MOSLEY stated, "Oh you got that shit in the hood," and WILLIAMS confirmed. (WILLIAMS was referring to contraband that he thought was stored under the hood of the car.) MOSLEY responded, "Oh shit." The conversation continued, and WILLIAMS stated, "[U/I] Crack [U/I] I'm trying to say you talking about [U/I] I'm trying to tell you what's going on right now. I'm scared." MOSLEY agreed, and WILLIAMS stated, "I'm scared like a mother fucker." (WILLIAMS was expressing that he was scared that law enforcement might find contraband in the car.) MOSLEY told WILLIAMS, "You might gotta grab them shits and go-- they gonna be on you, you heard?" (MOSLEY was telling WILLIAMS that WILLIAMS might have to flee to avoid law enforcement.)

106. The following morning, at approximately 9:36 a.m., MOSLEY spoke with an incarcerated co-conspirator ("CC-7") and told CC-7, "the other grip, that shit under the join you heard? In the car." (MOSLEY was telling CC-7 about a gun stored under the hood of WILLIAMS's car.) The conversation continued, and CC-7 stated, "They took the only car he got it. The bitch got bagged and shit. But his trap, but his dumbest trap under the hood, was

'brick' under that shit. Yo that's crazy." (CC-7 was talking about a trap in WILLIAMS's car to hide contraband, including heroin.) In an aside, CC-7 stated, "Look, see they probably [U/I] his car, they tow his car and there is another gun under the hood with a brick, nah, not under the hood, they not gonna look over there." (CC-7 was stating that a gun and a brick of heroin were stored in WILLIAMS's car.)

107. Later that day, on or about August 3, 2018, at approximately 2:23 p.m., WEST called MOSLEY. During the conversation, MOSLEY told WEST, "They gonna come lock you up for that shit on my mother." (MOSLEY was telling WEST that WEST was going to get arrested for the gun.) WEST responded, "I am about to leave right now." The conversation continued, and WEST explained, "Cause look, mind you, look, we was outside you heard? We was all the way outside. He like yeah uhm-the op ni\*\*as running around in the black Jeep Cherokee, you feel me? I'm like, oh aight, I'm about to grip up, ain't no boys out there you heard? We was outside for a little minute already. we was chillin and shit, we was all smoking and shit, chillin and shit. I'm like yo uh-Before you know, I'm like hold this down real quick' you feel me? Just in case like, you feel me? Cause they don't say shit to ya'll. They only come to us[.]" (WEST was explaining that he didn't notice the law enforcement officers because they were driving a Jeep Cherokee, instead of a typical police car. WEST also was stating that he asked CC-5 to hold the gun "just in case" because, according to WEST, CC-5 was less to be questioned by law enforcement than WEST.)

108. Based on my training and experience, gang members engaged in narcotics trafficking often carry firearms to protect their drug-dealing territory, their narcotics supply, and proceeds from their narcotics trafficking activities. In addition, a subsequent search of WILLIAMS's vehicle revealed three glassine envelopes of suspected heroin and nine caps and one small bag of suspected crack cocaine that were stored under the rear passenger seat of the vehicle. As noted above, WEST, CC-5, DORRAH, and CC-6 all were passengers in WILLIAMS's vehicle.

#### August 31, 2018 Gun Arrest

109. On or about August 31, 2018, HOLMES received a call from CC-5. During the conversation, CC-5 told HOLMES, "Shaka wants you, cause it's not there. He got it." HOLMES said "aight" and later told CC-5, "Just tell him to make sure he puts it somewhere safe."

110. At approximately 6:07 p.m., HOLMES received another call from CC-5. During the conversation, HOLMES asked, "Ay yo, what happened to that, though?" CC-5 responded, "What?" and HOLMES said, "The strap" (referring to a firearm). CC-5 asked, "You want me to get it?" HOLMES responded, "Nah, I'm saying where—What ya'll do—What they do with it?" CC-

5 responded, "[An individual] said that when I went to go get it at first, she was like um, 'You're looking for that?' And so I'm like, 'Yeah.' And she was like, 'Oh, Shaka and them got it.' So I went to Shaka, and I was like, 'Shaka, you got it?' And then he was like um—He said something. I don't know, but I'm about to go out there and ask him, cause I saw him don't keep it on him. But I think he got it on him though." (CC-5 was explaining that CC-5 thought Shaka McKinney ("MCKINNEY") had the firearm ("strap") on his person.) HOLMES asked who said "Shaka" had it and then stated, "he probably don't." CC-5 then responded, "No, he said he got it." CC-5 then added, "But I don't know where he got it at. And I don't him, 'get it off of him, like don't keep it on him. Cause it looks like he had it on him."

111. Later that evening, at approximately 10:25 p.m., law enforcement conducted a motor vehicle stop of a vehicle that was observed turning without using a turn signal. Once the vehicle came to a stop, law enforcement saw the front seat passenger, later identified as MCKINNEY, lean down, so that his head was out of sight, and then sit back up again. When law enforcement approached the car, law enforcement smelled marijuana, saw MCKINNEY adjust his shirt as if to pull it down, and noticed a bulge in MCKINNEY's waistband. Law enforcement asked MCKINNEY to step out of the vehicle, and MCKINNEY spontaneously admitted that he had weed in his waistband, which law enforcement recovered.

112. Law enforcement then noticed the handle of a firearm partially sticking out from underneath the front passenger seat, where MCKINNEY had been sitting. The firearm was recovered and was determined to be a Lorcin 9mm Luger Model L9NN semi-automatic pistol, bearing serial number L118876 (the "Firearm"). The Firearm was test-fired by a law enforcement officer and determined to be operable and designed to expel a projectile by the action of an explosion.

113. The Firearm was manufactured outside the State of New Jersey. Accordingly, the Firearm necessarily had to travel in interstate commerce prior to MCKINNEY's possession of the Firearm in New Jersey on or about August 31, 2018.

114. On or about February 7, 2014, MCKINNEY was convicted in the Superior Court of New Jersey, Essex County, of Manufacturing, Distributing, or Dispensing more than 5 ounces of heroin/cocaine, in violation of N.J.S.A. § 2C:35-5B(1), a crime punishable by imprisonment for a term exceeding one year.

#### September 11, 2018 Gun Arrest

115. On or about September 11, 2018, at approximately 11:05 a.m., HOLMES received a call from an unidentified co-conspirator ("CC-10"). During the conversation, CC-10 asked HOLMES, "You still got the 38?" HOLMES said he did, and CC-10 responded, "I'm a come get it, I'm about to trade it for that." HOLMES asked, "What you about to trade it for?" and CC-10 said, "Ah, ah a baby 9." (CC-10 was referring to trading a 9mm firearm for a .38 caliber firearm.)

116. Approximately one minute later, at 11:06 a.m., HOLMES called an unidentified co-conspirator ("CC-11") and asked, "Ay yo you still got that 38?" CC-11 responded yes, and HOLMES said, "bring that shit to the hood." CC-11 responded, "Aight [another individual ("Individual-4")] got it. He in school. I had to leave school." HOLMES asked if Individual-4 had a phone, and when CC-11 said he did, HOLMES told CC-11 to send HOLMES the number.

117. At approximately 11:08 a.m., HOLMES placed a call to an unidentified co-conspirator ("CC-12") and asked, "yo you got that 3—3-8?" CC-12 said yes, and HOLMES responded, "We about to trade that shit for a baby 9. We need that shit." The conversation continued, and CC-12 said he had brought the gun inside school with him. HOLMES and CC-12 discussed when to meet, and HOLMES told CC-12 to call him when CC-12 got out of school.

118. Later that day, at approximately 10:52 p.m., HOLMES received a call from CC-5. During the conversation, CC-5 asked HOLMES what he was doing. HOLMES responded that he was "waiting for this other sale to come" (referring to a narcotics sale). CC-5 responded that she was ready to go, and HOLMES said, "Aight, come on then. Just bring my shit." CC-5 answered, "Nah, I'm scared to go by myself," to which HOLMES directed, "Bring the weed and bring the strap" (referring to a firearm). CC-5 asked, "How I'm a do all that. I don't got no jacket on" (referring to her inability to conceal a firearm). The conversation continued, and HOLMES told CC-5, "Tell [another individual ("CC-13")] to walk, tell [CC-13] to walk with you." CC-5 asked, "You want her to get the trap?" and HOLMES said, "Yeah, put that shit in the bag" (telling CC-5 to put the gun in a bag). CC-13 then came to the phone and HOLMES asked, "you can help me bring that shit over there?" and CC-13 agreed.

119. At approximately 11:02 p.m., HOLMES received another call from CC-5. During the call, CC-5 asked, "Where do I bring it now?" HOLMES responded, "strap and the weed." CC-5 and HOLMES then discussed where CC-5 could find the weed. At one point, CC-5 said in an aside, "[CC-2], check that box. What is that?" The conversation continued, and CC-5 told HOLMES, "We coming."

120. Law enforcement initiated surveillance in the area of CC-2's residence and, at approximately 11:15 p.m., observed two females and one male leave CC-2's residence. Law enforcement continued surveillance and stopped the three individuals. Based on reasonable suspicion developed during the stop, law enforcement frisked one of the females and recovered a firearm. The firearm was determined to be a Bryco Arms, Model Jennings

Nine, 9mm caliber firearm, with serial number 1483325. The other two individuals with the female were determined to be CC-5 and CC-2.

#### Additional Firearms

121. On or about September 14, 2018, at approximately 11:23 p.m. MOSLEY called HOLMES. During the conversation, HOLMES stated, "But 'Lieut' was fucking with, they must've done following us 'cause [another individual] said they went in her house and they knocked on the door and they wanted to check her bag and shit." (HOLMES was telling MOSLEY about actions taken by local law enforcement.) The conversation continued, and MOSLEY asked, "they wanted to check her bag?" HOLMES responded, "Yeah, they was looking-- for the strap. They thought I gave up, or passed the strap or some shit." MOSLEY stated, "Yeah? Oh, you ain't have the strap with you?" (MOSLEY was asking if HOLMES had a gun with him.) HOLMES responded, "Nah. Bruh, hell—you know I know better than that." (HOLMES was telling MOSLEY that he knew better than to carry a gun on him, to avoid arrest by law enforcement.) The conversation continued, and MOSLEY asked, "So what they say?" In response, HOLMES stated, "Nah, you know, the regular shit. You got anything on you?' No, I'm like no, you gonna have to find it. [chuckles]" (HOLMES was telling MOSLEY that the police asked if HOLMES had anything on him, and HOLMES did not. HOLMES also was joking with MOSLEY that he was not going to carry any firearms on him and, instead, the police would have to find them in order to recover them.)

#### **Violence**

122. Based on the investigation to date, law enforcement believes that the Famous Boyz have been involved in numerous shootings since in or around at least April 2017, including a number of shootings tied to a dispute between the Famous Boyz and a rival Newark gang, the 200 Avon Ave Boys.

123. The 200 Avon Ave Boys operate in and around the Pilgrim Baptist Village Housing Complex in Newark, New Jersey, located near the streets of Jeliff Avenue, Avon Avenue, Muhammad Ali Avenue, and 18th Avenue, among others (collectively, the "Pilgrim Village Area"). Between in or around April 2017 and in or around April 2018, at least fourteen shootings in the South 18th Street/15th Avenue Area and the Pilgrim Village Area are believed to be connected to a dispute between the Famous Boyz and the 200 Avon Ave Boyz.

124. The investigation also has revealed that the Famous Boyz, including but not limited to MOSLEY, WEST, BETHEA, MCKINNEY, DAWES, and JONES have used social media to display their affiliation with the gang, to communicate with other gang members concerning the business of the gang, and to threaten others, including rival gang members and individuals who intend to cooperate with law enforcement. 125. For example, in or around July 2018, law enforcement observed a video<sup>14</sup> posted on Instagram to an account used by WEST. In the video, DAWES, who was recognized by law enforcement, was shown making a handgun sign with his hand and pointing it at a wall with writing on it, including the number "200." Based on my training and experience, and knowledge of this investigation, DAWES was intending to threaten members of the 200 Avon Boys with gun violence.

126. On or about January 22, 2018, a photograph was posted to an account used by MCKINNEY (the "MCKINNEY Account") showing HOLMES, WEST, MCKINNEY, and others throwing gang signs. The caption of the photograph read, "Youuuu known that immaaa ride for my mf [ni\*\*as] . . . most immaaaa die wit my finger onaaa trigga . . . don't worry bout mines imam Grind till I get it." The caption also included an emoji depicting a black billiards ball with the number "8" on it (the "Number 8 Billiards Ball").<sup>15</sup> Based on the investigation, MCKINNEY was stating in this post that he was a member of Famous Boyz and was willing to engage in gun violence on behalf of the gang (stating that he was most going to die with his finger on the trigger of a weapon).

127. In addition, on or about December 29, 2017, a picture was posted to a Facebook account controlled by MOSLEY with the caption "Caution ......" The picture showed a number of individuals, some of whom were wearing ski masks covering their faces and others who were not and were recognized by law enforcement as members of the Famous Boyz, including DAWES and JONES. Based on my training and experience, and the investigation to date, this post was intended to intimidate and threaten rival gangs that they should take "caution" around members of the Famous Boyz.

128. On or about October 20, 2017, the following statement was posted to the MCKINNEY Account: "If any of you 200 ni\*\*as feel some way than blow, mf drop ya nuts . . . & me a man!!" Based on the investigation, this post was a threat to engage in violence with the 200 Avon Boys.

129. On or about October 19, 2017, the following statement was posted to the MCKINNEY Account: "Just Got my young [ni\*\*gas] a Street Sweeper for any [ni\*\*a] who want they block cleared . . . cause my team something ion [I

<sup>&</sup>lt;sup>14</sup>The video was posted in the form of an Instagram "story," which is a feature that allows uses of Instagram to post photos and videos that vanish after 24 hours. The video was observed by law enforcement prior to the video's automatic deletion by Instagram.

<sup>&</sup>lt;sup>15</sup> As noted above, the area of Newark in which the Famous Boyz primarily operate is referred to by members and associates of the Famous Boyz as the "8 Block." Based on the investigation to date, the Famous Boyz use the black billiards ball with the number "8" on it as a reference to his affiliation with the gang.

don't] play bout." The caption included the Number 8 Billiards Ball emoji and a heart emoji. Based on the investigation, MCKINNEY was stating that he had gotten a gun for younger members of the Famous Boys (referring to the fact that he had just gotten a "Street Sweeper") and that the Famous Boyz would use gun violence to protect their territory ("want they block cleared").

130. As an additional example, on or about October 13, 2017, a picture was posted to a Facebook account used by BETHEA and a co-conspirator ("CC-1") (the "BETHEA-CC-1 Account")<sup>16</sup> showing individuals recognized by law enforcement as, among others, BETHEA, WEST, and DAWES. BETHEA was shown fanning out a wad of cash and making a symbol with his finger depicting a gun. WEST also was shown holding a stack of cash and throwing gang signs. The caption of the photograph read, "[Ni\*\*as] Say They Want War Until They End Up Missing!" The letter "a" in "War" was substituted with a large red letter, which I believe is a reference to the Famous Boyz's status as a set of the Bloods.<sup>17</sup> Based on the investigation, this post was intended to threaten rival gang members, including the 200 Avon Boys, with gun violence.

131. On or about August 27, 2017, a picture was posted to the BETHEA-CC-1 Account showing CC-1 wearing a black and red shirt and fanning out cash in front of him. The caption of the photograph read, "They Know the Face They knows The Name." The next photo posted to the BETHEA-CC-1 Account showed a man wearing a similar black and red shirt with his back to the camera in what appears to be the same location with the caption, "No Face No Case." The "O" in both words was replaced with a red strike-through symbol. Based on my training and experience, this post was meant to warn witnesses that they should not testify against CC-1 or otherwise cooperate with law enforcement against CC-1 ("No Face No Case").

132. In addition, on or about July 28, 2017, a picture was posted to the MCKINNEY Account showing MCKINNEY, BETHEA, SAADIQ, and others. The caption of the photograph read, "If you ratting you a Dubb & you DON'T belong here." The caption also included a rat and a gun emoji and further stated, "All Hittas . . . Its Gone Be a Murder." Based on the investigation, this post was a

<sup>&</sup>lt;sup>16</sup> On or about September 20, 2017, a comment was posted to the BETHEA-CC-1 Account stating, "THIS MY PAGE NOW WE SHARING THIS SO HMU [meaning, "hit me up"] ON HERE Grimmey Troub \*Troub8bk!!" (meaning that BETHEA, who goes by the nickname "Troub" and CC-1 were sharing the account and people could reach BETHEA by sending messages to this account). The comment also included a hyperlink to another Facebook account,<sup>16</sup> which is an account previously used by BETHEA. The post also refers to the "8 block," which I believe is a reference to CC-1'a and BETHEA's membership in the Famous Boyz.

<sup>&</sup>lt;sup>17</sup> Based on my training and experience, red is a color worn by members of the Brick City Brims to display their membership in the gang.

threat to shoot or otherwise harm any individuals cooperating with law enforcement (a "rat") against the Famous Boyz.

133. Similarly, on or about July 16, 2017, a picture was posted to another Facebook account used by BETHEA showing a number of individuals recognized by law enforcement as members or associates of Famous Boyz, including but not limited to BETHEA, DAWES, JONES, and CC-1. Two individuals in the photograph appeared to be holding guns, and several individuals, including BETHEA and CC-1, also were holding cash. The caption of the photograph read, "Got Us Dancing With The Devil....Chasing This Money!" Based on the investigation, this post was a reference to drug trafficking activity and other illegal means of making money engaged in by members of the Famous Boyz.

134. On or about November 6, 2015, a picture was posted to another Facebook Account used by BETHEA (the "BETHEA Account") showing an individual recognized by law enforcement as SAADIQ and BETHEA. The caption of the photograph read, "Whack [Ni\*\*as] For a Living [Ni\*\*a] . . . Leave A [Ni\*\*a] Body in a River [Ni\*\*a] . . . I Don't Give a Fuck Bout How You Feeling . . . Its So Many Chances You Could Give a [Ni\*\*a]." The caption also included numerous emojis, including the Number 8 Billiards Ball and one showing a handgun with an explosion emoji by the barrel (depicting a gunshot). Based on the investigation, this post was intended as a threat to rival gang members and is a reference to gun violence engaged in by members of the Famous Boyz.

135. Some of the defendants, including MOSLEY and WEST, also have discussed possible violence during intercepted telephone conversations.

136. For example, law enforcement intercepted conversations regarding an attempted robbery by WEST and a co-conspirator ("CC-2"). Specifically, on or about August 28, 2018, based on intercepted conversations between WEST and others, law enforcement learned of potential plans to commit a robbery of an individual operating a black vehicle. As a result, law enforcement set up surveillance and identified a black vehicle as the possible target car (the "Vehicle"). WEST and CC-2, who was wearing a hooded sweatshirt covering his face and head, were in the same area. Shortly after observing another coconspirator ("CC-3") get into the Vehicle, law enforcement saw WEST point in the direction of the Vehicle to CC-2, who then approached and entered the Vehicle. Upon CC-2 getting into the Vehicle, the Vehicle began traveling at a high rate of speed before abruptly stopping. The driver of the Vehicle ("Victim-1") then fled the Vehicle on foot while yelling, "he's got a gun, he's trying to rob mel" CC-2 then got out of the Vehicle and dropped a firearm before fleeing on foot and avoiding apprehension. WEST was arrested approximately one block away. A firearm, which was determined to be a .40 caliber pistol, was recovered from the scene.

137. Shortly thereafter, at approximately 1:04 a.m. on August 29, 2018, MOSLEY called HOLMES. During the conversation, HOLMES described the incident and indicated that WEST, CC-2, and CC-3 tried to rob Victim-1. HOLMES also told MOSLEY that "the 40 is gone" (referring to the .40 caliber firearm). The conversation continued, and MOSLEY stated, "so all the rachets gone" and "damn we just lost all the straps" (complaining that the Famous Boyz had lost all of their firearms).

138. Later that night, at approximately 1:40 a.m., a co-conspirator ("CC-4") called MOSLEY. During the conversation, MOSLEY asked, "They said that they, um, tried to set up a white ni\*\*a?" CC-4 responded, "we did," and told MOSLEY she was about to explain. CC-4 later stated that there was a "white man who kept calling my phone type shit" for CC-3. CC-4 said that the man was calling her house phone, so she forwarded the call to another individuals' cell phone. CC-4 further explained that when the man called earlier that evening, CC-4 told him that he was calling the house phone and he stated "this [Victim-10, this [another girl's] friend" and that he was looking for CC-3. CC-4 explained that after discussing with CC-3, they found out that the man was going to bring \$100 and they came up with a plan to bring the man into the back of a house. However, the man "kicked off on [CC-3] three times, so they came up with a new plan." CC-4 stated that the new plan was for CC-3 to bring a gun into the car and for CC-2 to jump in, grab the gun, and rob the man. CC-4 stated that she thought CC-2 hit the victim or shot him, but she did not hear any shots, so she thought he hit him.

139. Law enforcement also intercepted conversations about possible retaliation after MOSLEY learned that GARCIA had been shot. In particular, GARCIA was shot on or about August 8, 2018. On or about August 8, 2018, MOSLEY called P. HERNANDEZ and asked whether "bro" was alright. MOSLEY and P. HERNANDEZ discussed that the bullet had skinned "his" back (referring to GARCIA). P. HERNANDEZ then indicated that the shooting was probably the result of the situation "he probably spoke to you about before, them ni\*\*as." MOSLEY agreed and said he told people to let them know. (Based on the investigation to date, MOSLEY was asking P. HERNANDEZ to let MOSLEY know if they learned who did the shooting.)

140. Later on or about the same day, MOSLEY received a phone call from another individual ("Individual-1"). During the conversation, Individual-1 asked if MOSLEY "heard about that other shit." MOSLEY responded, "Yeah, yeah. Like I was like what the fuck? I told that ni\*\*a we could have been did that shit he planned." Individual-1 asked, "is he good cause I'm just finding out right now." MOSLEY explained that "He got hit in the back but they don't think he got hit. They talking about-- he ah. I talked to um-- Patricio and he said um-- he got grazed in the back." The conversation continued, and MOSLEY stated, "My phone was there when this shit happened. I'm like-- I'm like what? You feel me cause we were already talking about that shit. He talking about he's gonna get calls from all these other ni\*\*as in the [unintelligible] and my little ni\*\*as don't know them ni\*\*as. If not we could have went over there already. You heard?" Individual-1 agreed and stated "there's shit going down-- definitely going down." MOSLEY responded, "Yeah but he's going down though."

141. Based on the investigation to date, my training and experience, and the context of this call, MOSLEY was discussing that retribution for the shooting was being planned ("there's shit going down") and that MOSLEY and the Famous Boyz could help ("[W]e could have went over there already.").