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

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UNITED STATES OF AMERICA :  
 :  
 v. : **CRIMINAL COMPLAINT**  
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 RAJERI CURRY : The Honorable Joseph A. Dickson  
 :  
 : Mag. No. 19-6539  
 :

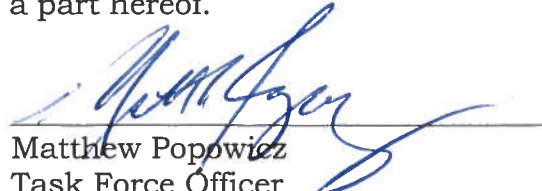
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Drug Enforcement Administration and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

  
Matthew Popowicz  
Task Force Officer  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,  
March 5, 2019 at Newark, New Jersey

THE HONORABLE JOSEPH A. DICKSON  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

**(Possession with Intent to Distribute Heroin)**

On or about January 17, 2018, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RAJERI CURRY,

did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

**COUNT TWO**  
**(Distribution and Possession with the Intent to Distribute  
Heroin and Fentanyl)**

On or about June 1, 2018, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RAJERI CURRY,

did knowingly and intentionally distribute, and possess with the intent to distribute, a mixture and substance containing detectable amounts of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and serious bodily injury to, and the death of, an individual resulted from the use of such mixture and substance distributed by the defendant.

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

**ATTACHMENT B**

I, Matthew Popowicz, am a Task Force Officer with the United States Drug Enforcement Administration (“DEA”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers and witnesses, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Criminal Complaint, Defendant Rajeri Curry (hereinafter, “Curry”) supplied heroin to individuals in and around Atlantic City, New Jersey. On or about April 18, 2008, Curry was convicted in Atlantic County Superior Court of manufacturing, distributing, or dispensing a controlled dangerous substance (“CDS”), in violation of N.J.S.A. 2C:35-5a(1). On or about July 29, 2011, Curry was convicted in Atlantic County Superior Court of distributing, dispensing, or possessing with the intent to distribute CDS on or near school property, in violation of N.J.S.A. 2C:35-7. As a result of these convictions, Curry is a career offender under the United States Sentencing Guidelines.

2. On or about January 17, 2018, law enforcement executed a search warrant at a residence in or around Atlantic City, New Jersey (the “Residence”) occupied by Curry. Pursuant to the search warrant, law enforcement recovered inside the Residence approximately 300 wax folds containing a substance that subsequently tested positive for the presence of heroin. Approximately 50 of the wax folds were stamped with the words “BODY COUNT” in blue ink, and were found in a jacket pocket of a coat, which Curry told law enforcement belonged to her.

3. On or about June 1, 2018, in or around Atlantic City, New Jersey, Curry distributed a substance, which later tested positive for heroin and fentanyl, to an individual who died as a result of using the substance. More specifically, on or about June 1, 2018, at approximately 7:53 p.m., law enforcement responded to the parking lot of a restaurant located in Atlantic City (the “Restaurant”), after receiving a 911 call reporting an unconscious male. The male (hereinafter, “the Victim”) was found deceased inside the driver’s seat of his vehicle; he was 30 years old.

4. Law enforcement found four wax folds containing a powdery substance—later confirmed to be a mix of fentanyl and heroin—on top of the center console inside the Victim’s vehicle, and an open plastic bag containing hypodermic syringes in the Victim’s hands, which were placed on his lap. The wax folds were stamped “BODY COUNT” in blue ink. Emergency Medical

Services responded to the scene and confirmed the Victim's death. An autopsy later revealed that the Victim's cause of death was the "combined adverse effects of fentanyl and heroin."

5. Following the Victim's death, law enforcement obtained surveillance footage from a business located adjacent to the Restaurant (the "Business"). The surveillance footage showed Curry, operating a black Cadillac DTS, arriving at the Business' parking lot at approximately 5:00 p.m. on June 1, 2018. Moments later, the Victim arrived in a vehicle and parked next to Curry. Curry exited the front driver's side of her vehicle and entered the front passenger seat of the Victim's vehicle. In the surveillance video, Curry can be seen giving the Victim something small from her left hand and the Victim can be seen counting the small items. Curry is then seen with what appears to be United States currency in her left hand. Based on my training and experience, and observations based on the surveillance footage, Curry and the Victim engaged in a heroin transaction. Following the heroin transaction, Curry returned to her vehicle and drove away. The Victim also drove away in the direction of the Restaurant's parking lot, where he was later found dead.

6. Following the Victim's death, law enforcement met with a member of the Victim's family ("Family Member-1"). Law enforcement informed Family Member-1 where the Victim was found, and Family Member-1 confirmed that was the general area where the Victim would go to purchase heroin. The Victim had previously identified for Family Member-1 the contact information for his heroin suppliers. One of those contacts was "Jera" who used a telephone number ending in 5496, which is a telephone number registered to "R. Curry."

7. On or about June 11, 2018, Curry was arrested in connection with the Victim's death and other narcotics distribution charges. Following Curry's arrest, she consented to a search of her iPhone, which is associated with a telephone number ending in 5796 (hereinafter, the "Curry 5796 Phone").

8. A search of the Curry 5796 Phone revealed that the Victim's phone number was found as a deleted contact. On or about June 2, 2018, Curry received a text message that said, "I was telling you that [the Victim] died." On or about June 6, 2018, Curry sent a text message to another individual asking, "wanna go with me?" The recipient replied, "where we goin?" Curry responded, "[Victim] viewing" . . . "That's my white boy." Evidence recovered in the course of this investigation confirmed that Curry attended the Victim's viewing.