## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

SHAHEED BLAKE,

a/k/a "Sha,"

a/k/a "Sha Gotti,"

a/k/a "Bruh,"

ANDERSON HUTCHINSON,

a/k/a "Murda Rah,"

KEYENN RODGERS.

a/k/a "Ali Bang,"

JASON COLON,

JESSE SCOTT,

a/k/a "King," HANIF YARRELL,

a/k/a "Haz,"

a/K/a 11az,

JABAAR BLAKE,

a/k/a "Jab,"

WILLIAM TEAL,

a/k/a "Bam,"

DAQUAN LOCKHART,

a/k/a "Slim,"

DORRELL BLAKE,

a/k/a "Rell,"

SHARIF DAVIS,

a/k/a "Reek,"

DAVID ROGERS,

a/k/a "Fifty,"

PAUL JOHNSON,

BERNARD BROWN,

a/k/a "BB,"

RAYSHELL GOFF,

ANTHONY BOWENS,

a/k/a "Fu,"

SHADEASHA FORD,

a/k/a "G-Girl,"

a/k/a "G-Baby,"

AARON WATSON,

a/k/a "AR,"

ALDORAY MCCLAIN,

a/k/a "Sal,"

Honorable James B. Clark, III

Mag. No. 19-3211

FILED UNDER SEAL

RASHEEM LANGLEY,
a/k/a "Q,"

ROGER THOMAS,
a/k/a "Riq,"

ANDREW KNOX,
a/k/a "Mil,"

BRITTNEY THOMAS,
a/k/a "Queen,"

LAMONT PUGH,
a/k/a "Monty,"

MARQUISE O'NEAL,
a/k/a "Mook,"

TODD GARRETT,
a/k/a "T," and

MAJUAN GREEN

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

#### SEE ATTACHMENT A

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives and that this criminal complaint is based on the following facts:

### SEE ATTACHMENT B

Matthew J. Gordon, Special Agent

Bureau of Alcohol, Tobacco, Firearms, & Explosives

Signature of Judicial Officer

Sworn to before me and subscribed in my presence, June 17, 2019, Essex County, New Jersey

Honorable James B. Clark, III United States Magistrate Judge

### ATTACHMENT A

## COUNT ONE (Continuing Criminal Enterprise)

From at least in or about 2013 through in or about June 2019, in Essex County, in the District of New Jersey and elsewhere, defendant,

SHAHEED BLAKE, a/k/a "Sha," a/k/a "Sha Gotti," a/k/a "Bruh,"

did knowingly and intentionally engage in a continuing criminal enterprise in that he knowingly and intentionally violated Title 21, United States Code, Section 841(b)(1)(A), which violation includes, but is not limited to, the acts comprising the conspiracy alleged in Count Three, which acts were part of a continuing series of acts that constitute violations of that statute undertaken by the defendant in concert with five or more persons, with respect to whom the defendant occupied the position of organizer, supervisor, manager, and from which continuing series of violations the defendant obtained substantial income and resources.

In violation of Title 21, United States Code, Sections 848(a) and 848(c).

## COUNT TWO (Continuing Criminal Enterprise)

From at least in or about December 2018 through in or about June 2019, in Essex County, in the District of New Jersey and elsewhere, defendant,

# ANDERSON HUTCHINSON, a/k/a "Murda Rah,"

did knowingly and intentionally engage in a continuing criminal enterprise in that he knowingly and intentionally violated Title 21, United States Code, Section 841(b)(1)(A), which violation includes, but is not limited to, the acts comprising the conspiracy alleged in Count Three, which acts were part of a continuing series of acts that constitute violations of that statute undertaken by the defendant in concert with five or more persons, with respect to whom the defendant occupied the position of organizer, supervisor, manager, and from which continuing series of violations the defendant obtained substantial income and resources.

In violation of Title 21, United States Code, Sections 848(a) and 848(c).

# COUNT THREE (Conspiracy to Distribute Controlled Substances)

From at least in or about September 2017 through in or about June 2019, in Essex County, in the District of New Jersey and elsewhere, defendants,

SHAHEED BLAKE, a/k/a "Sha," a/k/a "Sha Gotti," a/k/a "Bruh," ANDERSON HUTCHINSON, a/k/a "Murda Rah," KEYENN RODGERS, a/k/a "Ali Bang," JASON COLON, JESSE SCOTT, a/k/a "King," HANIF YARRELL, a/k/a "Haz," JABAAR BLAKE, a/k/a "Jab," WILLIAM TEAL, a/k/a "Bam," DAQUAN LOCKHART, a/k/a "Slim," DORRELL BLAKE, a/k/a "Rell," SHARIF DAVIS, a/k/a "Reek," DAVID ROGERS, a/k/a "Fifty," ANTHONY BOWENS, a/k/a "Fu," SHADEASHA FORD, a/k/a "G-Girl," a/k/a "G-Baby," ALDORAY MCCLAIN, a/k/a "Sal," RASHEEM LANGLEY, a/k/a "Q," ROGER THOMAS, a/k/a "Riq," ANDREW KNOX, a/k/a "Jamil," BRITTNEY THOMAS, a/k/a "Queen,"

LAMONT PUGH,
a/k/a "Monty,"
MARQUISE O'NEAL,
a/k/a "Mook,"
TODD GARRETT,
a/k/a "T," and
MAJUAN GREEN

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, both 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 FOUR (Conspiracy to Distribute Controlled Substances)

From at least in or about March 2019 through in or about June 2019, in Essex County, in the District of New Jersey and elsewhere, defendants,

PAUL JOHNSON,
BERNARD BROWN,
a/k/a "BB,"
RAYSHELL GOFF,
ANTHONY BOWENS,
a/k/a "Fu," and
RASHEEM LANGLEY,
a/k/a "Q,"

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

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

## COUNT FIVE (Possession with Intent to Distribute Cocaine Base)

On or about February 21, 2019, in the District of New Jersey and elsewhere, the defendant,

AARON WATSON, a/k/a "AR,"

knowingly and intentionally possessed with the intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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

#### ATTACHMENT B

I, Matthew J. Gordon, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives. 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, photographs, recordings, and other items of evidence. Where statements of others are related herein, they are related in substance and part. Where I refer to the contents of previously recorded conversations (e.g., consensual recordings or prior wiretap interceptions), quotations and descriptions are based on preliminary draft transcripts and/or translations of those conversations. 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.

## **OVERVIEW OF THE CKARTER CONSPIRACY**

- 1. From at least as early as in or around 2009, a group of individuals who referred to themselves as the "CKarter Boys" or the "Jonez Boys"—a tribute to one of their leaders who, prior to being murdered in Newark in 2012, went by the street name "CKarter Jones"—sold narcotics in and around a three-story apartment building located at 944 South 20th Street in Newark, New Jersey ("944 South 20th Street"). The CKarter Boys, which included, but was not limited to, Shaheed Blake, a/k/a "Sha," a/k/a "Sha Gotti," a/k/a "Bruh" ("Blake"), Anderson Hutchinson, a/k/a "Murda Rah" ("Hutchinson"), Daquan Lockhart, a/k/a "Slim" ("Lockhart"), and Hanif Yarrell, a/k/a "Haz" ("Yarrell"), were primarily members of the 793 set of the Bloods street gang. They referred to the residential complex located at 944 South 20th Street as "the CKarter" in reference to the 1991 film, New Jack City. Notably, the CKarter Boys changed the name "Carter" to "CKarter" to use the letters "CK," which members of the Bloods street gang use to denote "Crip Killer" to disrespect their rival street gang, the Crips.
- 2. In or around 2013, 944 South 20th Street was shut down as a residential property and became abandoned. At that time, its sole function was as an open-air narcotics distribution market controlled by Blake. During this time period, while Blake managed the sale of narcotics at 944 South 20th Street, Jabaar Blake ("Jabaar") managed the sale of narcotics at 925 South 20th Street, in Newark, New Jersey ("925 South 20th Street"), until Jabaar's incarceration in June 2018.
- 3. In or around early 2017, renovations began at 944 South 20th Street, and as a result, Blake's narcotics operation was displaced. At that time, Blake moved his operation from 944 South 20th Street to 921 South 20th Street in Newark, New Jersey ("921 South 20th Street") (collectively, with 925 South

20th Street, the "South 20th Street Houses"). Since that time, Blake and others have controlled the sale of heroin and crack cocaine at the South 20th Street Houses.

4. Hutchinson, an original member of the CKarter Boys, was involved in the sale of narcotics at 944 South 20th Street for several years. From on or about May 12, 2014, until on or about December 14, 2018, Hutchinson was incarcerated for his unlawful possession of a firearm as a convicted felon, in violation of 18 U.S.C. § 922(g)(1). Beginning in or around December 2018, following Hutchinson's release from federal custody—while on supervised release—Hutchinson assumed a position of authority over the sale of narcotics at the South 20th Street Houses.

## THE SOUTH 20TH STREET HOUSES

- 5. The primary location relevant to this Criminal Complaint is the area in and around the South 20th Street Houses, which are located on the South 20th Street block between Westervelt Place and Hopkins Place in Newark, New Jersey. This block contains two neighboring abandoned structures—921 South 20th Street, and 925 South 20th Street. The South 20th Street Houses host an open-air drug market for heroin and crack cocaine, typically 24 hours a day, seven days per week.
- 6. 921 South 20th Street has an impenetrable first floor with all doors and windows boarded up, such that it is accessible only through the second floor. Members of the drug-trafficking organization (the "DTO") gain access to 921 South 20th Street by way of a ladder to a second-floor window, which is typically brought inside the structure after DTO members climb inside. Once inside 921 South 20th Street, members of the DTO sell narcotics through a hole that has been cut out of the wall on the first floor. The hole, which measures approximately three inches by three inches, is used for buyers to pass currency and members of the DTO to pass narcotics, similar to a restaurant's drive-through window. Purchasers can purchase narcotics from 921 South 20th Street by entering an alleyway between 921 South 20th Street and 925 South 20th Street and approaching the hole.
- 7. In the rear yard of 921 South 20th Street, there is a shed-like structure where, at various times relevant to this Criminal Complaint, members of the DTO stored narcotics, firearms, and a communal cell phone, the purpose of which was for members of the DTO to communicate about the status of the narcotics stash and the need for a resupply.
- 8. 925 South 20th Street is located next to and immediately south of 921 South 20th Street. Members of the DTO sell heroin and crack cocaine from the front porch and first floor of 925 South 20th Street, as well as in the surrounding outdoor area.

9. The South 20th Street Houses are located in the heart of a residential community, just two blocks from the Thurgood Marshall Elementary School—an Irvington public school serving children from Pre-K to Fifth Grade.

### THE DEFENDANTS AND THEIR ROLES

- 10. At various times relevant to this Criminal Complaint, Blake, Hutchinson, and Jabaar were leaders and organizers who oversaw the DTO's distribution of heroin and crack cocaine at or around the South 20th Street Houses. To do so, Blake, Hutchinson, and Jabaar purchased bulk quantities of powder cocaine and heroin from various sources of supply; "cooked" powder cocaine into crack cocaine or directed others to do so; used various "stash houses" and other temporary locations to package, store, and distribute heroin and crack cocaine; used various "stash houses" to store narcotics proceeds; and delivered heroin and crack cocaine packaged for street-level distribution to the South 20th Street Houses, either personally or through the use of mid-level members of the DTO.
- 11. At various times relevant to this Criminal Complaint, Jason Colon ("Colon"), Keyenn Rodgers, a/k/a "Ali Bang" ("Rodgers"), Jesse Scott, a/k/a "King" ("Scott"), and Yarrell supplied the DTO with bulk quantities of narcotics. Specifically, Colon supplied Blake, Hutchinson, and others with powder cocaine; Rodgers supplied Blake with heroin; Yarrell supplied Hutchinson with heroin; and Scott supplied Hutchinson with crack cocaine.
- 12. At various times relevant to this Criminal Complaint, Rayshell Goff ("Goff"), Bernard Brown, a/k/a "BB" ("Brown"), and Paul Johnson ("Johnson") worked together to distribute narcotics out of a residence located on South 16th Street in Newark, New Jersey (the "South 16th Street Location"). At various times relevant to this Criminal Complaint, Goff supplied crack cocaine from the South 16th Street Location to several street-level members of the DTO to be resold by the DTO at the South 20th Street Houses.
- 13. At various times relevant to this Criminal Complaint, William Teal, a/k/a "Bam" ("Teal"), Lockhart, Dorrell Blake, a/k/a "Rell" ("Dorrell"), Sharif Davis, a/k/a "Reek" ("Davis"), and David Rogers, a/k/a "Fifty" ("Rogers") worked for the DTO by, at various times and among other conduct, assisting with the packaging of narcotics, handling the delivery of narcotics to the South 20th Street Houses; transferring narcotics proceeds from the South 20th Street Houses to Blake, Hutchinson, and/or Jabaar; and overseeing the street-level distribution of heroin and crack cocaine at the South 20th Street Houses.
- 14. At various times relevant to this Criminal Complaint, Anthony Bowens, a/k/a "Fu" (Bowens), Shadeasha Ford, a/k/a "G-Girl," a/k/a "G-Baby" ("Ford"), Roger Thomas, a/k/a "Riq" ("Thomas"), Rasheem Langley, a/k/a "Q" ("Langley"), Andrew Knox, a/k/a "Mil" ("Knox"), Lamont Pugh, a/k/a "Monty"

- ("Pugh"), Aldoray McClain, a/k/a "Sal" ("McClain"), Brittney Thomas, a/k/a "Queen" ("Brittney"), Marquise O'Neal, a/k/a "Mook" ("O'Neal"), Todd Garrett, a/k/a "T" ("Garrett"), Majuan Green ("Green"), and others worked for the DTO by selling heroin and crack cocaine from the South 20th Street Houses on behalf of Blake, Hutchinson, and/or Jabaar.
- 15. At various times relevant to this Criminal Complaint, Aaron Watson, a/k/a "AR" ("Watson") was an associate of Ford and Thomas who distributed narcotics in bulk quantities within Newark, New Jersey, and elsewhere.

### THE INVESTIGATION

- 16. From at least as early as in or around 2017, various law enforcement agencies have investigated the open-air narcotics market in and around the South 20th Street Houses. In the course of the investigation, law enforcement obtained multiple Court Orders authorizing the interception of wire and electronic communications occurring over several cellular telephone devices used in furtherance of the DTO's activities. As set forth throughout this Criminal Complaint, these wiretaps, in conjunction with mobile and fixed surveillance, controlled purchases, and the execution of court-authorized search warrants, among other investigative techniques, have revealed the operational structure and inner workings of the DTO and the method and means by which it carried out its narcotics-trafficking conspiracy
- 17. The investigation has revealed that Blake and Hutchinson each acted in concert with five or more individuals as to whom each defendant occupied a position of organizer, supervisor, or manager within the DTO and each obtained substantial income or resources from the distribution of heroin and crack cocaine. On average, 921 South 20th Street alone generated approximately \$10,000 per day in revenue from narcotics sales, and on at least one occasion in May 2019, revenue exceeded \$13,000 in one shift.

#### Seizures from Jabaar and 925 South 20th Street

- 18. At the outset of the investigation, law enforcement learned that Jabaar procured powder cocaine, which he and other members of the DTO then cooked into crack cocaine and packaged for street-level distribution at 925 South 20th Street.
- 19. During the week of August 27, 2017 and thereafter, law enforcement conducted surveillance and completed two controlled buys from Jabaar at 925 South 20th Street. On or about September 8, 2017, law enforcement executed a search warrant for Jabaar's residence on Yale Avenue in Irvington—a location that Jabaar was using to store narcotics destined for, and drug proceeds earned from, 925 South 20th Street. Law enforcement recovered, among other items, more than 1,500 grams of cocaine in both powder and crack form, more than \$6,000 in U.S. currency, and materials used for packaging narcotics for street-

level distribution. Jabaar was arrested and charged by state authorities with various offenses related to the distribution of controlled substances.

- 20. After being released on bail by a state court, Jabaar continued to possess and distribute narcotics on behalf of the DTO. For example, during the month of April 2018, law enforcement again received information that there was a 24-hour cocaine and heroin distribution operation at a vacant lot located in the area of 925 South 20th Street. Law enforcement ultimately obtained search warrants for, among other locations, 925 South 20th Street and Jabaar's residence on 22nd Street in Irvington, New Jersey (the "22nd Street Residence").
- 21. During the execution of the search warrant at the 22nd Street Residence, law enforcement seized approximately 40 grams of crack cocaine, which were in the process of "drying" after the cocaine was "cooked" from powder cocaine to crack cocaine. Law enforcement also recovered three bulletproof vests.
- 22. During the execution of the search warrant at 925 South 20th Street, Garrett was arrested in possession of a black plastic bag, which contained sixty glassine envelopes of heroin, twenty-three bags of crack cocaine, and \$950 in U.S. currency. Law enforcement also seized two firearms—a .45 caliber High Point Model JHP, bearing serial number X4216984, and a 9mm Sig Sauer Model P22k, bearing serial number U172491, among additional ammunition—in the outdoor area adjacent to 925 South 20th Street. Teal and Jabaar were also arrested and charged with various offenses related to the distribution of controlled substances.
- 23. On or about February 25, 2019, Jabaar pled guilty to conspiracy to manufacture or distribute a controlled dangerous substance in violation of N.J.S.A. 2C:5-2A(1); possession with intent to distribute a controlled dangerous substance within 1,000 feet of school property, in violation of N.J.S.A. 2C:35-7; and manufacturing or distributing a controlled dangerous substance, in violation N.J.S.A. 2C:35-5A(1). On or about April 30, 2019, Garrett pled guilty to manufacturing or distributing a controlled dangerous substance, in violation N.J.S.A. 2C:35-5A(1), and possession of a controlled dangerous substance, in violation N.J.S.A. 2C:35-10A(1). On or about May 6, 2019, Teal pled guilty to conspiracy to manufacture or distribute a controlled dangerous substance in violation of N.J.S.A. 2C:5-2A(1); possession with intent to distribute a controlled dangerous substance within 1,000 feet of school property, in violation of N.J.S.A. 2C:35-7; and possession of a controlled dangerous substance, in violation N.J.S.A. 2C:35-10A(1). Jabaar, Teal, and Garrett have not yet been sentenced.

## Blake and Hutchinson Procured Narcotics for the DTO From Multiple Sources of Supply

24. Throughout the investigation, wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, have revealed that Blake and Hutchinson obtained powder cocaine, heroin, and crack cocaine from various suppliers, which they then prepared and packaged for street-level distribution and delivered to the South 20th Street Houses.

## Blake and Hutchinson Obtained Powder Cocaine from Colon for the DTO

- 25. Wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, have revealed that Blake and Hutchinson obtained powder cocaine from Colon for the DTO, which Blake, Hutchinson, and other members of the DTO then cooked into crack-cocaine. For example:
- 26. On or about May 28, 2019, at approximately 5:56 p.m., Hutchinson, who was using a phone number ending in 4993 (the "Hutchinson 4993 Phone"), contacted Colon, who was using a phone number ending in 4453 (the "Colon 4453 Phone"). During that conversation, Hutchinson and Colon had the following exchange:

Hutchinson: I'ma, uh, try to see you today or tomorrow hopefully, man. I'ma have something for you.

Colon: Sounds good, man. Appreciate you.

27. On or about May 30, 2019, at approximately 5:17 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Hutchinson: Hey, um, I'ma have a couple dollars for you today, uh, what time do you want to meet up? Too, my brother wanted to meet up with you and s\*\*\*.

Colon: Um, I'm around right now actually.

Hutchinson: S\*\*\*, nah, them n\*\*\*\* not around. I'm with my mans and s\*\*\*. They, they went down the hill real quick with some s\*\*\*.

Colon: Aight, what time you think?

Hutchinson: Probably say like an hour or two. I'll hit you.

Colon: Okay.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson and Colon were planning to meet for purposes of a narcotics transaction.

28. Shortly thereafter, at approximately 5:28 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Hutchinson: Yeah probably within like the next hour, I'ma uh, I'ma get a couple dollars together for you now and I'll hit you but we about to pull up on you. We tryin to do something.

Colon: Nah, yeah, I'm in the area. That's what I was sayin'.

Hutchinson: Aight, yeah, probably like the next hour – half hour.

Colon: Okay.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson told Colon that he (Hutchinson) would have money ("I'ma get a couple dollars together for you") to purchase narcotics from Colon.

29. At approximately 7:29 p.m.—in response to a text from the Colon 4453 Phone to the Hutchinson 4993 Phone stating, "where to?"—Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Colon: Yo.

Hutchinson: Yo.

Colon: Yeah, whattup?

Hutchinson: S\*\*\*, I'm waiting on brother and them to

come up the hill. They coming from up the hill.

Colon: Aight, so you ain't got no spot yet? Where you

wanna meet?

Hutchinson: Uhhh, s\*\*\*. I don't really know. It don't really matter. I guess, umm, let me see, let me see, let me see. By the park, that's good? Irvington park, that's good, or nah?

Colon: I don't care. Let me know.

Hutchinson: S\*\*\*, I don't know if it's hot around there or not. Wait, hold up. State right here locking some little n\*\*\*\*s up, hold on. They got these n\*\*\*\*s in the Lincoln, pulling n\*\*\*\*s on 19th Street.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson told Colon that he was waiting on Blake ("brother") to arrive before meeting with Colon. When they discussed meeting at Irvington Park for the drug transaction, Hutchinson told Colon that he did not know whether law enforcement was in that area at the time ("I don't know if it's hot around there or not"). Then, Hutchinson told Colon that state law enforcement officers were in the area making an arrest.

- 30. During this conversation between Hutchinson on the Hutchinson 4993 Phone and Colon on the Colon 4453 Phone, Hutchinson answered a call on another cellular device. Upon answering the separate call, Hutchinson stated to Colon, "this is them right here, hitting me, about to see where they at. Hold on." Hutchinson then engaged in a separate conversation, during which he stated, "Yo, I'm up here on the block. Bruh, on the other line. He trying to figure out what we gonna do." Thereafter, Hutchinson resumed his conversation with Colon and directed Colon to meet him "on Springfield by the fish market across from McDonalds" in "about 15 minutes, 10-15 minutes."
- 31. At approximately 7:54 p.m., Colon, using the Colon 4453 Phone, contacted Hutchinson, who was using the Hutchinson 4993 Phone. During this conversation, Hutchinson and Colon had the following exchange:

Colon: You there?

Hutchinson: Nah, I'm about to be there. I was waiting on this n\*\*\*. He should be about to pull up. He went to go get my man – he tryin' to introduce you to my man.

Colon: Yeah, I'm here.

Hutchinson: Aight, I'm gon' give ya - ya hear me?

Colon: Yeah.

Hutchinson: I got four for you now, I'm gonna have four

for you in a couple more days

Colon: Okay.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson told Colon that he (Hutchinson) was about to arrive for their meeting, that Blake had gone to get another associate ("introduce you to my man"), and that he would have half the money today and half the money in a few days.

- 32. At approximately 8:03 p.m., Colon, using the Colon 4453 Phone, contacted Hutchinson who was using the Hutchinson 4993 Phone. During this conversation, Hutchinson stated to Colon, "we gon' go inside McDonalds so that we can sit down."
- 33. Surveillance units then observed Colon arrive in the area of the McDonalds on Springfield Avenue in Newark, New Jersey, in a Ford Taurus, bearing New Jersey Registration F57KXH (the "Taurus"). Law enforcement also observed Blake arrive in a silver 2005 Buick Rainier with dark tinted windows, bearing New Jersey registration B65FSS ("the Buick"), accompanied by another individual, and Hutchinson arrive in a Jeep Grand Cherokee bearing New Jersey Registration N59KRD (the "Hutchinson Jeep"). All four individuals exited their respective vehicles, entered the McDonalds, and sat down for a meeting for approximately thirty minutes.
- 34. Three days later on June 2, 2019, at approximately 12:01 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Colon: Yo.

Hutchinson: Ayo, umm, where you gonna be in like 20

minutes?

Colon: Ahhh, I can be in Irvington.

Hutchinson: Aight. I'ma need to holla at you about

something.

Colon: Okay.

35. In two subsequent calls between Hutchinson and Colon, which occurred at approximately 12:19 p.m. and 12:34 p.m., Hutchinson and Colon confirmed a meeting location on Coit Street in Irvington, New Jersey. Surveillance units then observed Colon arrive to that area in the Taurus, and at

approximately 12:38 p.m., surveillance units observed Hutchinson enter the passenger seat of the Taurus, at which time Colon drove northbound, executed a U-turn, and returned to the same location. At approximately 12:42 p.m., Hutchinson exited the Taurus and Colon drove away from the area at a high rate of speed.

36. At approximately 2:16 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Colon: Yo.

Hutchinson: Yo, what, you have to go to Colombia,

n\*\*\*\*?

Colon: Yeah, I'm tryin' ta make it.

[Laughter]

Colon: Nah, nah, I'm coming, I'm coming.

Hutchinson: How long, man?

Colon: Yeah, I'm trying to get there. It's so much s\*\*\* goin' on, man. I should stayed my a\*\* home. That's

what I shoulda did.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson commented on how long it was taking Colon to provide cocaine and Hutchinson joked that Colon had to go to Colombia to obtain it.

- 37. At approximately 2:39 p.m., law enforcement observed Colon in the Taurus in the area of Coit Street in Irvington, New Jersey, at which time he was observed speaking to two unidentified individuals. At approximately 3:01 p.m., law enforcement observed Colon enter the Taurus and drive to a residence in New Jersey (the "Colon Residence"), after making a brief stop at an AutoZone in Irvington.
- 38. At approximately 3:30 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Colon told Hutchinson, "I'm heading down to you now." Thereafter, law enforcement observed Colon enter the Colon Residence at approximately 3:35 p.m. At approximately 3:45 p.m., law enforcement observed Colon emerge from the rear of the Colon Residence holding a beige-colored shopping bag, which appeared to be weighted down. At that time, Colon entered the Taurus, and surveillance units followed Colon in the Taurus to the area of

Coit Street in Irvington. At approximately 4:12 p.m., law enforcement observed Hutchinson arrive in that location in the Hutchinson Jeep. Thereafter, law enforcement observed Blake exit the front passenger seat of the Hutchinson Jeep and enter the Taurus. At that time, a third vehicle arrived in the area driven by another individual, Co-Conspirator 1. Shortly thereafter, law enforcement observed Blake exit the Taurus, walk back to the Hutchinson Jeep, and pass an unknown object through the front passenger side window. At that time, Colon exited the Taurus and greeted Co-Conspirator 1 who exited his vehicle simultaneously. Colon then returned to the Taurus and retrieved what appeared to be the same beige-colored shopping bag, which he then passed to Co-Conspirator 1. Thereafter, Co-Conspirator 1 placed the beige-colored shopping bag in his vehicle, after which the meeting dispersed.

39. On or about June 5, 2019, at approximately 3:12 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation,

Hutchinson: Yo, I'm tryin' to get wit chu in about like an hour.

Colon: Aight what we doin?

Hutchinson: Let me gather this s\*\*\* up and make sure and see. I'mma let you know the exact number -- prolly like 180 to 200, either one of them.

Colon: Okay.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson told Colon that Hutchinson needed another supply of narcotics, between 180 and 200 grams of cocaine.

- 40. At approximately 6:33 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone, and stated, "Yo, uh, 2," in response to which Colon stated, "Aight." Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson followed up from his prior conversation with Colon in which he stated that he would need between 180 and 200 grams of cocaine and now clarified that he would need 200 ("2") grams.
- 41. At approximately 7:58 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Colon: Hey. Yo.

Hutchinson: Yeah, what happened?

Colon: I'm trying to get something, man. I - I working

on something different.

Hutchinson: Aight, so how long?

Colon: Uh, might be in the morning.

Hutchinson: Aight.

42. At approximately 8:07 p.m., the Colon 4453 Phone sent a text to the Hutchinson 4993 Phone stating, "I got it". At approximately 8:10 p.m., Hutchinson, who was using the Hutchinson 4993 Phone, contacted Colon, who was using the Colon 4453 Phone. During that conversation, Hutchinson and Colon had the following exchange:

Colon: Yo.

Hutchinson: Yeah, what happened?

Colon: I got it.

Hutchinson: Aight, aight, how long?

Colon: Um, up to you.

Hutchinson: Huh - I'm ready.

Colon: I'm in the area. Alright, give me like 5 minutes,

same spot.

Hutchinson: Aight.

43. At approximately 8:24 p.m., surveillance units observed Colon arrive on Coit Street in a Nissan Altima, bearing New Jersey Registration X12HZR (the "Altima"). Hutchinson—who had arrived in the Hutchinson Jeep—exited his vehicle and entered the passenger side of the Altima. Seconds later, Hutchinson exited the Altima, and both Colon and Hutchinson departed the area in their respective vehicles.

### Blake Obtained Heroin from Rodgers for the DTO

- 44. Wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, have revealed that Blake obtained multiple bricks of heroin from Rodgers on a near-daily basis for the DTO. For example:
- 45. On or about May 25, 2019, at approximately 11:43 p.m., Blake, using a phone number ending in 3760 (the "Blake 3760 Phone"), called Rodgers,

who was using a phone number ending in 6620 (the "Rodgers 6620 Phone"). During that conversation, Blake and Rodgers had the following exchange:

Rodgers: Hello?

Blake: Yeah, what up?

Rodgers: What's goin' on?

Blake: Uh, where you at?

Rodgers: In the house.

Blake: S\*\*\* -- I'm out knocked out at my house til you

called me. I'm just waking the f\*\*\* up.

Rodgers: [U/I]

Blake: Hm?

Rodgers: Oh.

Blake: Word? S\*\*\*, I'm on the way.

Rodgers: Aight, you gotta meet me over there.

Blake: Aight.

46. Shortly thereafter, on or about May 26, 2019, at approximately 12:17 a.m., Blake, using the Blake 3760 Phone, called Rodgers, who was using the Rodgers 6620 Phone. During that conversation, Blake and Rodgers had the following exchange:

Rodgers: Hello?

Blake: Yeah, let me know when you want me to pull

around.

Rodgers: How many?

Blake: Six.

Rodgers: Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Blake told Rodgers that he (Blake) needed to purchase six bricks of heroin.

- 47. At approximately 12:29 a.m., Rodgers, using the Rodgers 6620 Phone, contacted Blake, who was using the Blake 3760 Phone, and instructed Blake to "pull in the back parking lot." Mobile surveillance units observed Blake arrive in the Buick and enter the parking lot behind 72 Hayes Street in Newark, New Jersey. Mobile surveillance units then observed Rodgers approach the Buick, enter the front passenger seat, and then exit moments later.
- 48. On or about May 27, 2019, at approximately 10:16 p.m., Blake, using the Blake 3760 Phone, called Rodgers, who was using the Rodgers 6620 Phone. During that conversation, Blake and Rodgers had the following exchange:

Blake: What up with you?

Rodgers: I was waitin' on you.

Blake: Damn, my bad, what up with you?

Rodgers: S\*\*\*, down the hill.

Blake: Aight, I'm on the way.

Rodgers: Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Blake called Rodgers because he (Blake) needed to purchase more bricks of heroin.

49. Shortly thereafter, at approximately 10:26 p.m., Blake, using the Blake 3760 Phone, called Rodgers, who was using the Rodgers 6620 Phone. During that conversation, Blake and Rodgers had the following exchange

Rodgers: Hello?

110110.

Blake: Yeah, I'm here.

Rodgers: Aight.

Blake: Six piece. Where you want me to pull at?

Rodgers: Go across the street. You across the street,

right?

Blake: Yeah.

Rodgers: You go back over by, uh, should go to the crib, cause, uh, matter fact, I'm, uh, about to give it to ya like here.

Blake: Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Blake told Rodgers that he (Blake) needed to purchase six bricks of heroin.

- 50. At that time, surveillance units observed a meeting between Blake and Rodgers in the area of Hayes Street in Newark, New Jersey.
- 51. On or about June 7, 2019, at approximately 3:27 p.m., Blake, using the Blake 3760 Phone, called Rodgers, who was using the Rodgers 6620 Phone. During that conversation, Blake and Rodgers had the following exchange:

Rodgers: Yo.

Blake: Yo what up?

Rodgers: What's good, yo?

Blake: Where you at?

Rodgers: I'm down bottom.

Blake: I'm down here - seven piece.

Rodgers: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Blake told Rodgers that he (Blake) needed to purchase seven bricks of heroin.

#### Hutchinson Obtained Heroin from Yarrell for the DTO

- 52. Wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, have revealed that Hutchinson obtained heroin from Yarrell for the DTO. For example:
- 53. On or about May 29, 2019, at approximately 3:48 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted Yarrell who was using a phone number ending in 2824 (the "Yarrell 2824 Phone"). During that conversation, Hutchinson and Yarrell had the following exchange:

Yarrell: Yo.

Hutchinson: Yo let me get a one piece.

Yarrell: Huh?

Hutchinson: Let me get a one piece.

Yarrell: Where you at?

Hutchinson: About to pull up.

Yarrell: Alright, that shit is going to have to be a mix.

Hutchinson: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson ordered from Yarrell one brick of heroin and Yarrell told Hutchinson that the brick would be a "mix" of different stamps.

54. Thereafter, on or about May 29, 2019, at approximately 9:47 p.m., McClain, who was using a phone number ending in 2334, contacted Hutchinson who was using the Hutchinson 4993 Phone. During this conversation, Hutchinson and McClain had the following exchange:

Hutchinson: Yo.

McClain: Rah, she said come through, man.

Hutchinson: [U/I] said what?

McClain: Hold up, hold on, hold on. You said you need what? Yeah, she said she need some more. She said

she need some more boy.

Hutchinson: Alright

McClain: You heard me?

Hutchinson: Ask her what she got.

McClain: He said what you got? He said what you got?

She said all the boy's gone. That's what sellin.

Hutchinson: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson spoke with McClain—a streetlevel member of the DTO—regarding the status of the supply at the South 20th Street Houses, and McClain informed Hutchinson that they were out of heroin ("boy").

55. Almost immediately thereafter, Hutchinson, using the Hutchinson 4993 Phone, contacted Yarrell who was using the Yarrell 2824 Phone. During that conversation, Hutchinson and Yarrell had the following exchange:

Hutchinson: Yo. Ya'll went over there?

Yarrell: Hell no man, I ain't got nothing. These n\*\*\*\*s ain't got nothin.

Hutchinson: Oh they ain't got nothing?

Yarrell: Hell no. I, I gave you my last one earlier. Thinking these n\*\*\*\*s was loaded and these n\*\*\*\*s ain't got shit.

Hutchinson: So you can't get nothin?

Yarrell: Hell no.

Hutchinson: Aight, even at the other one?

Yarrell: Hell no, s\*\*\*'s f\*\*\*ed up right now man.

Hutchinson: Alright, alright.

Yarrell: If I hit something, I'll hit you, but right now it ain't looking good.

Hutchinson: Alright.

Yarrell: If I hit something, I'll hit you, but right now it ain't looking good.

Hutchinson: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson called Yarrell to obtain heroin in order to resupply the South 20th Street Houses in light of the information Hutchinson had received from McClain, but Yarrell informed Hutchinson that he (Yarrell) was out of heroin and could not fulfil Hutchinson's request.

56. Several days later, on or about June 1, 2019, at approximately 6:57 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted Yarrell who was using the Yarrell 2824 Phone. During that conversation, Hutchinson and Yarrell had the following exchange:

Hutchinson: I need, I need a two piece and a biscuit to go.

Yarrell: You said what?

Hutchinson: I need a two piece.

Yarrell: Um, I um, I'ma have to see if, ugh, I could just grab it because he ain't answering none of my calls. I'm gonna have to call back.

Hutchinson: Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson ordered from Yarrell two bricks of heroin. Yarrell agreed to obtain it.

57. Thereafter, at approximately 8:17 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted Yarrell who was using the Yarrell 2824 Phone. During that conversation, Hutchinson and Yarrell had the following exchange:

Hutchinson: Yo, what happened?

Yarrell: S\*\*\*, he ain't hit me back yet. I hit him all day, he ain't hit me back. I don't know. Soon as I hear from him, you know I got you.

### Hutchinson Obtained Crack Cocaine from Scott for the DTO

- 58. Wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, have revealed that Hutchinson obtained crack cocaine from Scott for the DTO. For example:
- 59. On or about May 25, 2019, at approximately 8:33 p.m., the Hutchinson 4993 Phone sent a text message to Scott, who was using a phone number ending in 8062 (the "Scott 8062 Phone"), in which Hutchinson stated, "20". Shortly thereafter, at approximately 8:37 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted Scott, who was using the Scott 8062 Phone. Scott answered Hutchinson's call by stating, "Yeah, I just saw it, Bruh. I'm 'bout to -- I'm 'bout to go get it now."
- 60. At approximately 9:08 p.m., Scott, using the Scott 8062 Phone, contacted Hutchinson, who was using the Hutchinson 4993 Phone, and informed Hutchinson that he was on Nye Avenue—a location known to law enforcement in Newark, New Jersey. Mobile surveillance units, utilizing a GPS mobile tracking device on the Hutchinson Jeep, observed Scott arrive in a Cadillac CTS (the "Cadillac") in the area of Leslie Street and Shaw Avenue in Newark, New Jersey, and park behind the Hutchinson Jeep. Law enforcement then observed Scott exit the Cadillac and enter the passenger seat of the

Hutchinson Jeep. Seconds later, law enforcement observed Scott exit the Hutchinson Jeep and reenter the Cadillac, at which time both Scott and Hutchinson departed the area in their respective vehicles.

61. On or about May 26, 2019, between approximately 8:29 a.m. and 9:52 a.m., the Hutchinson 4993 Phone and the Scott 8062 Phone exchanged the following series of text messages:

Hutchinson: 30

Scott: I think it's 27 left give me a sec I'll let u know

Hutchinson: K

Scott: 28

Hutchinson: K how long

Scott: I fell asleep I'll be like 15 minutes

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson ordered from Scott 30 grams of crack cocaine, and Scott responded that he thought he only had twenty-seven grams left to sell, then clarified that he had twenty-eight.

62. On or about June 1, 2019, between approximately 9:37 a.m. and 11:28 a.m., the Hutchinson 4993 Phone and the Scott 8062 Phone exchanged the following series of text messages:

Hutchinson: 20

Scott: I'm in Elizabeth u gotta give me a sec

Hutchinson: K how long

Scott: 10 minutes

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson ordered from Scott 20 grams of crack cocaine.

- 63. Shortly thereafter, at approximately 11:30 a.m., Scott, using the Scott 8062 Phone, contacted Hutchinson, who was using the Hutchinson 4993 Phone, and stated, "I'm five minutes away."
- 64. Mobile surveillance units responded to the area of Leslie Street and Shaw Avenue in Newark, New Jersey, where Scott and Hutchinson had met on prior occasions. Law enforcement observed the Cadillac parked on Leslie Street,

at which time Hutchinson arrived in a Nissan Maxima, bearing New Jersey Registration Z56KVK (the "Maxima"). Law enforcement then observed Hutchinson exit the Maxima and walk to the passenger side of the Cadillac where he leaned into the vehicle, retrieved an item, placed that item underneath his shirt, and then returned to the Maxima. Seconds later, both Scott and Hutchinson departed the area in their respective vehicles.

### The DTO Distributed Copious Quantities of Crack Cocaine and Heroin

- 65. After procuring heroin and cocaine from various sources as set forth above, Blake and Hutchinson orchestrated the street-level distribution of those narcotics in large quantities. Blake oversaw a group of individuals who sold narcotics on his behalf primarily within 921 South 20th Street; Hutchinson oversaw a group of individuals who sold narcotics on his behalf primarily within 925 South 20th Street and/or the shed-like structure behind 921 South 20th Street; and Teal and Dorrell sold narcotics, in conjunction with Blake and Hutchinson, primarily in the outdoor areas surrounding the South 20th Street Houses. Blake and Hutchinson coordinated their narcotics sales through their shared suppliers and through coordinated counter-surveillance efforts in and around the South 20th Street Houses.
- 66. As described below, the investigation has revealed that the DTO, through its leaders and members, has distributed well in excess of 280 grams of crack-cocaine, a Schedule II controlled substance, and well in excess of one kilogram of heroin, a Schedule I controlled substance. The investigation has revealed that, on average, the DTO distributed in excess of 85 grams of crack cocaine and 7 grams of heroin each day.
- 67. Blake and Hutchinson each conducted "drops"—typically, at the South 20th Street Houses or at the nearby Ember's Tavern—at least once per day, during which each delivered a resupply of narcotics to a street-level member of the DTO. In addition, Blake and Hutchinson each coordinated a money pick-up from the South 20th Street Houses, during which a street-level member delivered the proceeds obtained since the last drop.
- 68. Through a number of different investigative techniques, law enforcement determined that Blake routinely delivered narcotics to the South 20th Street Houses in, among other vehicles, the Buick. For each delivery, Blake parked the Buick at the intersection of Westervelt Place and South 20th Street, at which time another member of the DTO approached the Buick and retrieved a black plastic bag containing crack cocaine and/or heroin.
- 69. For example, on or about August 4, 2018, members of the Newark Police Department conducted mobile surveillance of the area, and at approximately 12:30 a.m., while traveling north on South 20th Street from Clinton Avenue, officers observed an individual, later identified as Bowens,

retrieve an object from the Buick, which was parked facing westbound on Westervelt Place. Officers then stopped Bowens who was found in possession of approximately 599 small bags of crack cocaine, each of which was embossed with a purple unicorn, and 251 decks of heroin. On or about March 5, 2019, a Senior Forensic Chemist at the Union County Prosecutor's Office Forensic Laboratory analyzed a random sample selection of the contents of the 599 bags of crack cocaine that Bowens possessed on or about August 4, 2018. The results of that testing revealed an extrapolated net weight of 86.747 grams of a substance confirmed to be cocaine. Likewise, the 251 decks of heroin were analyzed by the same Senior Forensic Chemist at the Union County Prosecutor's Office Forensic Laboratory on or about March 5, 2019, and those test results revealed an extrapolated net weight of 7.77 grams of a substance confirmed to be heroin.

- 70. During the investigation, in conjunction with frequent mobile surveillance, law enforcement placed a pole camera in the area of the South 20th Street Houses in or around August 2018. This pole camera—which has captured and recorded activity at the South 20th Street Houses on a 24-hour basis for approximately ten months—has captured Blake, Hutchinson, Teal, Lockhart, Dorrell, Rogers, Goff, Bowens, Ford, McClain, Langley, Thomas, Knox, Brittney, Pugh, O'Neal, and Green engage in activity in furtherance of the DTO's narcotics trafficking activities on numerous occasions. For example:
- 71. On or about August 17, 2018, at approximately 7:25 p.m., Blake parked the Buick near the intersection of Westervelt Place and South 20th Street, at which time O'Neal approached the window of the Buick, retrieved a black bag, and walked in the direction of the South 20th Street Houses.
- 72. On or about September 2, 2018, at approximately 6:08 a.m., Blake drove the Buick to the intersection of Westervelt Place and South 20th Street, at which time Pugh was standing on Westervelt Place waiting for Blake's arrival. When Blake arrived, Pugh approached the window of the Buick, retrieved an item, and walked in the direction of the South 20th Street Houses.
- 73. On or about September 9, 2018, at approximately 2:08 p.m., Blake parked the Buick near the intersection of Westervelt Place and South 20th Street, at which time Pugh approached and entered the Buick. Several seconds later, Pugh exited the Buick and ran toward the South 20th Street Houses.
- 74. On or about September 15, 2018, between approximately 12:00 p.m. and 12:35 p.m., Teal arrived at the South 20th Street Houses and handed an item to Ford. Thereafter, Ford, Rogers, and Knox each engaged in multiple hand-to-hand transactions with individuals who approached the area. Knox, for his part, took paper currency from several patrons and directed those individuals to Ford and Rogers. Ford and Rogers, in turn, took paper currency from Knox or from other patrons directly, entered the front door of 925 South 20th Street to

retrieve small items, and then handed those small items to the patrons who had provided currency. While Ford and Rogers were initially sitting on the front porch of 925 South 20th Street, they thereafter relocated such that Ford and Teal were inside 925 South 20th Street and continue to engage in hand-to-hand transactions through a hole in the front door.

- 75. On or about September 17, 2018, at approximately 12:04 p.m., Blake parked the Buick near the intersection of Westervelt Place and South 20th Street, at which time O'Neal approached and entered the Buick. Several seconds later, O'Neal exited the Buick and ran toward the South 20th Street Houses.
- 76. On or about May 20, 2019, at approximately 12:00 p.m., an unknown individual approached Dorrell, who was sitting on the front porch of 925 South 20th Street, and handed over paper currency. Dorrell then turned over several small items. In the following minutes, Dorrell engaged in two similar hand-to-hand transactions.
- 77. On or about May 25, 2019, at approximately 3:06 p.m., an unknown individual approached Dorrell, who was sitting on the front porch of 925 South 20th Street, and handed over paper currency. Dorrell then turned over several small items.
- 78. On or about May 26, 2019, at approximately 1:37 p.m., Bowens exited the alleyway between 921 South 20th Street and 925 South 20th Street and walked to the corner of Westervelt Place and Montgomery Avenue. At approximately 1:51 p.m., Blake arrived in the Buick and parked on Westervelt Place, at which time Bowens approached the Buick and entered the front passenger seat. At approximately 1:57 p.m., Bowens exited the Buick and quickly proceeded back to the alleyway between 921 South 20th Street and 925 South 20th Street.
- 79. Thereafter on May 26, 2019, at approximately 5:41 p.m., Hutchinson arrived on Westervelt Place in the Hutchinson Jeep, at which time Thomas exited the front door of 925 South 20th Street and proceeded to the passenger window of the Hutchinson Jeep. After Hutchinson and Thomas engaged in a brief conversation, Green exited the front door of 925 South 20th Street and approached the passenger window of the Hutchinson Jeep, at which time Hutchinson passed an item through the passenger window to Green. Green then took that item back inside 925 South 20th Street, and Hutchinson drove away.
- 80. On or about June 1, 2019, at approximately 11:59 a.m., an unknown individual approached Green who was sitting on the front porch of 925 South 20th Street, at which time Green reached down and retrieved a small item, which he then placed on a brick ledge on the porch in front of the unknown individual. The unknown individual then retrieved the small item from the brick

ledge and handed Green paper currency. A few minutes later, at approximately 12:03 p.m., another unknown individual approached Green, at which time Green handed that unknown individual a small item, in response to which that unknown individual handed Green paper currency. At approximately 12:06 p.m., a third unknown individual approached Green and placed paper currency on the brick ledge on the porch of 925 South 20th Street where Green was seated. Green then took the paper currency and placed a small item in its place on the brick ledge, which the unknown individual then took.

81. During the investigation, law enforcement also attempted and conducted several controlled purchases of both heroin and crack cocaine from the South 20th Street Houses, some of which are summarized in the chart below.

| Date       | Defendant(s)<br>Involved | Amount Purchased (appx.) <sup>1</sup>                                      |
|------------|--------------------------|--|
| 8/14/2018  | FNU LNU                  | Four \$10 bags of suspected cocaine base                                   |
| 10/23/2018 | Thomas<br>Pugh           | Twenty \$10 bags of suspected cocaine base                                 |
| 11/20/2018 | Ford                     | Thirty \$10 bags of suspected cocaine base                                 |
| 2/6/2019   | Thomas<br>FNU LNU        | Six \$10 bags of suspected cocaine base                                    |
| 3/7/2019   | FNU LNU                  | Six \$10 bags of suspected cocaine base                                    |
| 3/7/2019   | FNU LNU                  | Five \$10 bags of suspected cocaine base;<br>Ten decks of suspected heroin |
| 3/8/2019   | Ford<br>Thomas           | One brick of suspected heroin  |
| 3/8/2019   | Bowens                   | Nineteen decks of suspected heroin   |
| 3/13/2019  | McClain<br>Bowens        | Twenty \$10 bags of suspected cocaine base                                 |

82. On March 8, 2019, at approximately 11:51 a.m., a law enforcement confidential source (the "CS") walked into the alleyway between 921 South 20th Street and 925 South 20th Street, at which time Ford and Thomas approached the CS. During the exchange, Ford—who recognized the CS from prior narcotics purchases—stated, in sum and substance, "we are out right now," which the CS understood to be a reference to crack cocaine. In response, the CS requested

<sup>&</sup>lt;sup>1</sup> For crack cocaine purchases, the items purchased are described as either \$5 doses or \$10 doses. Generally, in Newark, \$5 doses are called "nickels" or "nicks," and \$10 doses are called "dimes" or "cookies." For heroin purchases, a "deck" commonly refers to one single-dose packet, or glassine envelope, of heroin. A "bundle" commonly refers to approximately ten single-dose packets, or glassine envelopes, of heroin grouped together. A "brick" commonly refers to approximately fifty single-dose packets, or glassine envelopes, of heroin, often packaged as five bundles grouped together.

one brick of heroin, at which time Ford stated to Thomas, put the ladder up." Thomas then set up the ladder, and Ford climbed into the second floor of 921 South 20th Street. Once Ford was inside, the CS handed \$225 through the hole in the structure in exchange for one brick of suspected heroin. The CS then handed Ford an additional \$20, which Ford requested as a broker's fee.

- 83. On a prior attempted purchase on or about February 6, 2019, at approximately 11:03 a.m., a second law enforcement confidential source ("CS-2") entered the alleyway between 921 South 20th Street and 925 South 20th Street and encountered Thomas who identified himself as "Riq" and told CS-2 that "the house" had no drugs for sale. After Thomas escorted CS-2 to a nearby area where CS-2 purchased suspected crack cocaine from an unknown individual, Thomas walked CS-2 back toward the South 20th Street Houses and stated, "I got four guns back there" in reference to the shed-like structure behind 921 South 20th Street.
- 84. Law enforcement also conducted several controlled purchases of both heroin and crack cocaine from Watson, beginning on or about November 28, 2018. On that date, shortly before 1:30 p.m., the CS arrived at the South 20th Street Houses and attempted to purchase narcotics from Ford. Ultimately, Ford informed the CS that she was waiting on a resupply of narcotics, but could connect the CS with another distributor. Approximately one hour later, while still at 921 South 20th Street, Ford and Thomas introduced the CS to Watson who produced two plastic bags containing clear vials, each of which was filled with a pink/white substance. The CS then counted out twenty \$10 doses of crack cocaine and seventy-three \$5 doses of crack cocaine before handing \$520 to Watson. As the exchange concluded, Watson identified himself as "AR" and told the CS, in sum and substance, that if the CS were to give Watson one day's notice, Watson would be able to get the CS anything the CS needs.

85. In the weeks and months following this exchange, the CS purchased narcotics from Watson on numerous occasions, as set forth in the following chart:

| Date of Transaction | Amount Purchased                                  |
|---------------------|---|
| 11/28/2018          | Twenty \$10 vials of suspected cocaine base;      |
|                     | Seventy-three \$5 vials of suspected cocaine base |
| 12/11/2018          | 101 \$10 vials of suspected cocaine base;         |
|                     | three decks of suspected heroin                   |
| 1/9/2019            | 100 \$10 vials of suspected cocaine base;         |
|                     | one brick of suspected heroin                     |
| 2/4/2019            | 25 grams of suspected cocaine base                |
| 2/21/2019           | 34.7 grams of cocaine base                        |
| 6/12/2019           | 100 \$10 vials of suspected cocaine base;         |
|                     | five bricks of suspected heroin                   |

- 86. Wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, revealed that the DTO utilized several street-level distributors who sold narcotics at the South 20th Street Houses and communicated with more senior members of the DTO to obtain a resupply of narcotics, as needed. For example:
- 87. On or about April 30, 2019, at approximately 11:04 p.m., Bowens, using a phone number ending in 5626 (the "Bowens 5626 Phone"), contacted Lockhart, who was using a phone number ending in 5490 (the "Lockhart 5490 Number"). During that conversation, Bowens and Lockhart had the following exchange:

Bowens: Yo give me a count again. I left that piece of paper home. I'm going to write it down right now. I'm at the bar waiting for him. I don't want to hear his mouth.

Lockhart: What you writing down?

Bowens: 101 C.

Lockhart: My phone about to die.

Bowens: It was 101 C.

Lockhart: You heard? Hurry up, my phone about to die.

Bowens: Alright, alright, his phone about to die. Tell me -- 101 C.

Lockhart: I'll tell you about --  $[U/I^2]$  -- on the phone, man. The f\*\*\*. I'm doing you this favor.

Bowens: 10 C, 3 B, and 33.

Lockhart: Yeah, yeah.

Bowens: Alright, alright. 101 C, 3 B, and 33. Alright, bet.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Bowens was asking Lockhart to tell him the

<sup>&</sup>lt;sup>2</sup> "U/I" denotes that, at this juncture, the portion of the audio recording so designated cannot be heard using readily-available audio equipment.

current count of narcotics at the stash house, and in response, Lockhart confirmed that the count was 101 cookies of crack cocaine, three bricks of heroin, and thirty-three individual bags of heroin.

- 88. On or about May 2, 2019, at approximately 7:47 p.m., Teal, using a phone number ending in 1374 (the "Teal 1374 Phone"), received two text messages from McClain, who was using a phone number ending in 4982 (the "McClain 4982 Number"), in which McClain stated, "Bam where are you at I need that works get with me I'm on the block at the trap." Based on the content of the conversation, my training and experience, and the results of the investigation to date, McClain was advising Teal that he (Teal) needed to supply McClain with narcotics for McClain to sell at the South 20th Street Houses.
- 89. On or about May 3, 2019, at approximately 11:50 a.m., Teal, using the Teal 1374 Phone, contacted Bowens, who was using the Bowens 5626 Phone. During that conversation, Teal and Bowens had the following exchange:

Teal: Fu, you uh -- what you got, two left or one?

Bowens: Bam, I ain't got two left, son. I got twenty and mother\*\*\*ing seven.

Teal: Got what?

Bowens: I got twenty and seven.

Teal: Twenty and seven left?

Bowens: Twenty. I got twenty and seven left.

Teal: Hold on, hold on. Now you say you got what?

Bowens: Twenty blocks and seven crackers, man.

Teal: Okay, damn. Damn, you good.

Bowens: S\*\*\* slow as hell.

Teal: S\*\*\* slow?

Bowens: Damn, s\*\*\* is super slow.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Teal and Bowens were discussing the quantity of narcotics that Bowens had remaining because their narcotics business was slow that day.

- 90. On or about May 22, 2019, Brittney, using a phone number ending in 7698 (the "Brittney 7698 Phone"), sent a text message to Hutchinson on the Hutchinson 4993 Phone, which stated, "Where you at with the d blk?" Based on the content of the conversation, my training and experience, and the results of the investigation to date, Brittney was asking Hutchinson where he was with the resupply of heroin.
- 91. On or about May 23, 2019, at approximately 11:45 p.m., Lockhart, using a phone number ending in 5490 (the "Lockhart 5490 Phone") contacted Blake, who was using the Blake 3760 Phone. During that call, Lockhart informed Blake that he was "at the bar." At approximately 11:55 p.m., Lockhart, using the Lockhart 5490 Phone, contacted Blake, who was using the Blake 3760 Phone, again stated that he was at the bar.
- 92. At approximately 11:56 p.m., Lockhart was observed exiting the alleyway between 921 South 20th Street and 925 South 20th Street and walking west on Clinton Avenue. At that time, surveillance units observed Lockhart's presence at Ember's Tavern on Clinton Avenue in Irvington, New Jersey. On May 24, 2019, at approximately 12:08 a.m., Blake, using the Blake 3760 Phone, contacted Lockhart, who was using the Lockhart 5490 Phone, and stated, "grab about two bags of weed out the machine and come to the house." Immediately after the call, at approximately 12:09 a.m., law enforcement observed Lockhart enter Ember's Tavern. At approximately, 12:10 a.m., law enforcement observed Lockhart exit Ember's Tavern and walk toward South 19th Street.
- 93. At approximately 12:12 a.m., Lockhart, using the Lockhart 5490 Phone, contacted Blake, who was using the Blake 3760 Phone, and informed Blake that he was outside. At 12:13 a.m., Lockhart was observed entering a residence known to be used by Blake on South 19th Street (the "South 19th Street residence"). Thereafter, at approximately 12:39 a.m., Lockhart was observed exiting the 19th Street Residence and proceeding north on Hopkins Place. At approximately 12:41 a.m., Lockhart was observed entering the alleyway between 921 South 20th Street and 925 South 20th Street, after which he is observed exiting the alleyway approximately one minute later. Based on the content of the conversation, my training and experience, and the results of the investigation to date, Lockhart and Blake were communicating in order to coordinate Lockhart picking up the resupply of narcotics for the South 20th Street Houses. During those communications, Lockhart informed Blake that he was at Ember's Tavern, and Blake asked Lockhart to bring marijuana from Ember's Tavern to the South 19th Street residence.
- 94. On or about May 24, 2019, at approximately 7:05 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted Green, who was using a phone number ending in 7103 (the "Green 7103 Phone"). During that conversation, Hutchinson and Green had the following exchange:

Hutchinson: Do you have anything?

Green: Yeah, he still got s\*\*\*.

Hutchinson: I said you - do you got somethin?

Green: I'm, I'm, I got like ten bags, Rak. That's why you should let me go 'head and get that so I could be on deck and really be here.

Hutchinson: I'm not mixing my s\*\*\* wit nobody else's. I'm not doin' that.

Green: I ain't mixin' yours. I ain't mixin' yours. They gonna come to me anyway, 'cause this s\*\*\* fire as well, bruh.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson asked Green whether he had any narcotics left in his possession, in response to which Green explained that he had ten bags. Green, who also sold narcotics from a source separate from Hutchinson, then inquired about simultaneously selling Hutchinson's supply. Hutchinson, in turn, rejected the idea of Green selling Hutchinson's product at the same time that Green sold his own supply. Green then commented that the drug users would go to him regardless, because he was selling high quality narcotics.

95. On or about May 25, 2019, at approximately 1:45 p.m., Ford, using the Bowens 5626 Phone, contacted Hutchinson, who was using the Hutchinson 4993 Phone. During that conversation, Ford and Hutchinson had the following exchange:

Ford: I'm sorry to shout you, but it's nuttin' out.

Hutchinson: Yeah [unintelligible].

Ford: Yeah, it's nuttin' here and it's mad s\*\*\* coming through.

Hutchinson: Aight, I'm bout to be right there.

Ford: Aight. Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Ford asked Hutchinson to resupply the South 20th Street Houses because the area was busy with customers, but the DTO was out of drugs to sell them.

- 96. On or about May 24, 2019, at approximately 2:30 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted an unknown male on a phone number ending in 9901 (the "9901 Phone"). During that conversation, Hutchinson stated, "I'mma come to the house n see you later. I'm lookin' fuh one of my workers. B\*\*\*\* got twenty-five hunnit, and f\*\*\*\*in' been gone, man." Approximately two hours later, the 9901 Phone sent a text message to Hutchinson on the Hutchinson 4993 Phone and stated, "Checking in to make sure u didn't catch a body lol". Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson was telling the user of the 9901 Phone that he was currently unavailable because one of his subordinate DTO members ("one of my workers") stole \$2,500 from him.
- 97. On or about May 25, 2019, at approximately 1:48 a.m., Knox, using a phone number ending in 9039 (the "Knox 9039 Phone"), contacted Hutchinson, who was using the Hutchinson 4993 Phone. During that conversation, Knox and Hutchinson had the following exchange:

Knox: Yeah, this Mil. Doo was trying to call you. I need to see you, big bruh.

Hutchinson: Where doo at?

Knox: Doo, he running around these streets and s\*\*\*. Like right here, but um, I need to see you.

Hutchinson: [unintelligible].

Knox: Let me know where, alright. Where, where at.

Hutchinson: I'll be rolling through. What happened?

Knox: Again, what you was saying you was looking for me earlier.

Hutchinson: Oh, I, yeah, yeah, yeah. I'm on it.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson had informed other members of the DTO that he was looking for Brittney who had stolen money from him. Knox told Hutchinson that he needed to see him because he knew where Hutchinson could find Brittney.

98. Thereafter, on or about May 25, 2019, at approximately 1:51 a.m., Knox, using the Knox 9039 Phone, sent a text message to Hutchinson, who was using the Hutchinson 4993 Phone, and stated "I found what you looking for." In a subsequent conversation at approximately 2:00 a.m. between Knox, using the

Knox 9039 Phone, and Hutchinson, who was using the Hutchinson 4993 Phone, the following exchange occurred:

Knox: What's up, cousin?

Hutchinson: Hey, you was just in there?

Knox: I was there, bruh. I got the number. I was just

over there. Yeah.

Hutchinson: Alright, you can get back in there?

Knox: I can't get in there, but I can get them out of there. I can get them out.

Hutchinson: Alright, give me like ten minutes and I want you to get her up out of there.

Knox: Okay, I got you.

Hutchinson: Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Knox told Hutchinson that he knew where Brittney was and he could draw her out once Hutchinson arrived at that location.

99. Thereafter on or about May 25, 2019, between approximately 2:05 a.m. and 2:11 a.m., the Knox 9039 Phone and the Hutchinson 4993 Phone exchanged the following series of text messages:

Knox: They both together

Hutchinson: Only need queen

Knox: He moving with her I'm ready when you ready I'm going to call him tell them I'm going to pick them up and you pull up when I get her out.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Knox told Hutchinson that Brittney and Langley were together, and Hutchinson told Knox that he only needed Brittney.

- 100. Law enforcement then conducted a lawful motor vehicle stop of Hutchinson's vehicle, during which law enforcement seized a bent baseball bat and a knife that were in Hutchinson's possession.
- 101. Shortly thereafter, at approximately 2:48 a.m., Hutchinson, using the Hutchinson 4993 Phone, sent a text message to Knox, who was using the

Knox 9039 Phone, which stated, "State just pulled me". At approximately 2:51 a.m., Hutchinson, using the Hutchinson 4993 Phone, sent a text message to Knox, who was using the Knox 9039 Phone, which stated, "Wait 2 the moring". Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson informed Knox that, given his encounter with law enforcement, he was going to wait until the morning to address the issue with Brittney.

- 102. On or about May 25, 2019, at approximately 8:35 p.m., Knox, using the Knox 9039 Phone, sent a text message to Hutchinson, who was using the Hutchinson 4993 Phone, and stated, "What's good big bruh I'm on deck." Based on the content of the conversation, my training and experience, and the results of the investigation to date, Knox informed Hutchinson that he was working the next shift at the South 20th Street Houses.
- 103. On or about May 28, 2019, at approximately 5:15 p.m., Lockhart, using the Lockhart 5490 Phone, contacted Blake, who was using the Blake 3760 Phone, during which Lockhart asked Blake whether he should "go straight there or go straight to the house." In response, Blake instructed Lockhart to "come to the house." Shortly thereafter, at approximately 5:18 p.m., Lockhart, using the Lockhart 5490 Phone, placed a call to Blake, who was using the Blake 3760 Phone, stating that he was "in the hallway." Based on the content of the conversation, my training and experience, and the results of the investigation to date, Lockhart and Blake were communicating in order to coordinate Lockhart picking up the resupply of narcotics for the South 20th Street Houses.
- 104. On or about May 28, 2019, at approximately 9:39 p.m., Lockhart, using the Lockhart 5490 Phone, contacted Blake, who was using the Blake 3760 Phone, during which Lockhart stated, "you need drug?" Blake, in response, stated, "get the f\*\*\* off the phone Slim, you silly a\*\* n\*\*\*\*, man." Based on the content of the conversation, my training and experience, and the results of the investigation to date, Blake was upset with Lockhart because Lockhart spoke openly over a cellphone about drug dealing, thus providing evidence against Blake if law enforcement were wiretapping either cellphone.
- 105. On or about May 29, 2019, at approximately 12:33 a.m., McClain, using a phone number ending in 2344 (the "McClain 2344 Phone"), contacted Hutchinson, who was using the Hutchinson 4993 Phone. During that conversation, McClain and Hutchinson had the following exchange:

McClain: Yo my man say he finished.

Hutchinson: You said what?

McClain: He finished.

Hutchinson: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, McClain informed Hutchinson that the DTO member who was then at the South 20th Street Houses had finished the narcotics supply that had been provided to him earlier in the day.

106. On or about May 29, 2019, at approximately 1:08 a.m., Ford, using the Bowens 5626 Phone, contacted Hutchinson, who was using the Hutchinson 4993 Phone. During that conversation, Ford and Hutchinson had the following exchange:

Ford: Rah, I'm finishing up with a half or whatever the case may be, but I need some more. I only got like four left.

Hutchinson: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Ford informed Hutchinson that she needed additional narcotics at the South 20th Street Houses.

107. On or about May 31, 2019, at approximately 10:19 p.m., Blake, using the Blake 3760 Phone, contacted Davis, who was using a phone number ending in 7368 (the "Davis 7368 Phone"). During that conversation, Blake and Davis had the following exchange:

Blake: Reekster, where you at, baby?

Davis: I'm -- right now I'm going to pick my girl up from work.

Blake: Aight, come to the house so you can, uh, knock that, uh, 20 off for me.

Davis: Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Blake asked Davis to assist with cooking powder cocaine into crack cocaine.

108. Thereafter, on or about May 31, 2019, at approximately 11:13 p.m., Davis, using the Davis 7368 Phone, contacted Blake, who was using the Blake 3760 Phone. During that conversation, Blake and Davis had the following exchange:

Davis: Yo, I'm gettin' off the highway right now.

Blake: Aight, come to the house.

Davis: Aight.

109. Almost immediately thereafter, on or about May 31, 2019, at approximately 11:15 p.m., Blake, using the Blake 3760 Phone, contacted Lockhart, who was using the Lockhart 5490 Phone. During that conversation, Blake and Davis had the following exchange:

Lockhart: Hello?

Blake: Yo where you at?

Lockhart: I'm 'bout to catch a cab there.

Blake: Aight, hurry up. Reeky about to come and he

gon' help us out too so it can be faster.

Lockhart: Aight.

110. On or about June 3, 2019, at approximately 12:44 a.m., Blake, using the Blake 3760 Phone, contacted Davis, who was using the Davis 7368 Phone. During that conversation, Blake and Davis had the following exchange:

Blake: Bring it down, Reek.

Davis: You, you out here? You here?

Blake: Yeah.

Davis: Aight.

Blake: You ready?

Davis: Yeah, give me like, yo, give me like ten minutes.

Blake: Reek, hurry up. Damn.

Davis: Aight.

111. Shortly thereafter, at approximately 1:31 a.m., Davis, using the Davis 7368 Phone, contacted Blake, who was using the Blake 3760 Phone. During that conversation, Blake and Davis had the following exchange:

Davis: You close?

Blake: Yeah, I'm about to leave out now. Start coming

down.

Davis: Alright, call me when you get close.

Blake: I'm close now, Reek. Start coming down.

- 112. At approximately 1:37 a.m., Blake, using the Blake 3760 Phone, contacted Davis, who was using the Davis 7368 Phone, and stated "bout to pull up." At that time, law enforcement observed Blake arrive in the Buick on Nye Avenue in Irvington, New Jersey, after which law enforcement observed Davis exit a residence on Nye Avenue and enter the passenger seat of the Buick. A short time later, law enforcement observed Davis exit the Buick and return to the Nye Avenue residence.
- 113. On or about June 7, 2019, at approximately 10:11 p.m., Hutchinson, using the Hutchinson 4993 Phone, contacted Brittney, who was using the Brittney 7698 Phone. During that conversation, Brittney and Hutchinson had the following exchange:

Hutchinson: Yo, where you at?

Brittney: I'm on the block. I'm bout to count right now

[unintelligible].

Hutchinson: Where Moo at?

Brittney: On the porch.

Hutchinson: Aight, aw s\*\*\*. Um, what you got. Tom.

Brittney: I'm bout to count right now.

Hutchinson: Some D block -- I'll bring you some.

Brittney: Thank God. Aight.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Hutchinson inquired about the status of the narcotics supply and the whereabouts of certain DTO members and then stated that he would bring additional heroin.

#### Goff Supplies Crack Cocaine to the DTO through Bowens and Langley

- 114. Wiretap interceptions, in conjunction with mobile and fixed surveillance, as well as other investigative techniques, revealed that Goff, who was based at the South 16th Street Location in coordination with Johnson and Brown, supplied the DTO with crack cocaine through Bowens and Langley.
- 115. Law enforcement was familiar with the South 16th Street Location from prior investigations, including the use of mobile surveillance and controlled purchases of narcotics in March 2019. Specifically, on or about March 4, 2019, a law enforcement confidential source purchased one vial of crack cocaine from

Brown at the South 16th Street Location. In addition, mobile surveillance units observed Johnson engage in several hand-to-hand transactions from the South 16th Street Location.

- 116. Then, on or about March 13, 2019, members of the Newark Police Department executed a search warrant at the South 16th Street Location, during which 90 glassine envelopes of heroin and 101 baggies of crack cocaine were recovered. In addition, Johnson, who was present at the time, was found in possession of \$292 in U.S. currency and four cell phones, and Brown, who returned to the South 16th Street Location during the execution of the search warrant, was found in possession of \$2,009 in U.S. currency. Even after the execution of this search warrant, however, the drug operation at the South 16th Street Location continued and continued to supply crack cocaine to the South 20th Street Houses.
- 117. On or about April 29, 2019, at approximately 11:11 p.m., Langley, using the Bowens 5626 Phone, contacted Goff, who was using a phone number ending in 7108 (the "Goff 7108 Phone"). During that conversation, Langley and Goff had the following exchange:

Langley: Hey Ray.

Goff: Yeah.

Langley: This Q calling from Fu phone. S\*\*\*, my s\*\*\* on the charger.

Goff: Oh okay.

Langley: Yeah, uh, uh, I need ten real fast. You can get to me?

Goff: Yeah, I can. Yeah.

Langley: Uh, yeah, yeah, yeah. One, two, three - yeah I need ten real fast.

Goff: Oh, okay. You finished?

Langley: Uh, matter of fact, I need twenty real fast.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Langley called Goff because he needed an additional delivery of narcotics.

118. On or about April 30, 2019, at approximately 11:34 a.m., Bowens, using the Bowens 5626 Phone, contacted Goff, who was using the Goff 7108

Phone. During this five-minute conversation, Goff and Bowens discussed the logistics of their business relationship—specifically, the fee that Bowens paid to Goff for her transportation of the narcotics to the South 20th Street Houses. Goff offered to waive that transportation fee in exchange for Bowens selling additional narcotics for the South 16th Street Conspiracy at the South 20th Street Houses location. During this discussion, while Bowens was initially uninterested, Bowens stated, "if I got to go to 16th, I'll go to 16th myself. I'll just, I'll just go to 16th."

119. On or about May 6, 2019, at approximately 1:12 p.m., Bowens, using the Bowens 5626 Phone, contacted Goff, who was using the Goff 7108 Phone. During that conversation, Bowens and Goff had the following exchange:

Bowens: Wanna get right?

Goff: Yeah. How you doin?

Bowens: I'm doin fine.

Goff: That's cool -- number?

Bowens: So.

vens. 50.

Goff: Okay, so -

Bowens: I'm 2-0.

Goff: Okay, we're gonna start off, start off slow. We're gonna put twenty-five in there and you just do five for us. Don't pay for no transportation.

Bowens: Say no more then.

Goff: I'll call you when I'm getting closer. I'm waiting for B to come out of the chiropractor.

Bowens: Oh, alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Bowens and Goff agreed that Bowens and his associates would sell a quantity of narcotics on Goff's behalf in lieu of Goff charging them a transportation fee for delivering the narcotics to the South 20th Street Houses.

120. At approximately 2:55 p.m., law enforcement observed Goff exit the South 16th Street Location and enter a BMW X3 (the "Goff BMW"). At approximately 3:07 p.m., Bowens, using the Bowens 5626 Phone, contacted Goff, who was using the Goff 7108 Phone. During that conversation, Goff stated,

"I'm on my way." At approximately 3:10 p.m., Langley, using the Bowens 5626 Phone, contacted Goff, who was using the Goff 7108 Phone. During that conversation, Langley and Goff had the following exchange:

Langley: It's Q.

Goff: Hello?

Langley: Yeah, you hear me?

Goff: Yeah, I hear you.

Langley: It's Q, what's good?

Goff: Yeah, what up? What you need? I'm on my way

there.

Langley: Aight.

Goff: Yeah, what's up? Hello?

Langley: Yeah, I need eighteen.

Goff: Eighteen?

Langley: Mhm.

Goff: Eighteen.

Langley: Yeah, cause I'm kinda short for the twenty and s\*\*\*. I don't have a straight hundred.

Goff: You said you're not on 20th, you're across the street?

Langley: No, I'm in back.

Goff: Oh alright. Hold on. Let me turn around. I'm goin' to get yours cause I'm on my way to Fu, so I'm about to go back and get yours.

Langley: Alright.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Langley and Goff were arranging for Goff to deliver a quantity of narcotics to the South 20th Street Houses.

- 121. Law enforcement then observed Goff return to the South 16th Street Location, at which time Brown exited the South 16th Street Location and entered the Goff BMW.
- 122. At approximately 3:27 p.m., Goff, using the Goff 7108 Phone, contacted Bowens, who was using the Bowens 5626 Phone. During that conversation, Bowens and Goff had the following exchange:

Bowens: Yo.

Goff: Hey Fu. Me and BB are coming to the back right now.

Bowens: Alright, yo, yo, yo, yo, yo, yo, [U/I].

Goff: Huh? Huh?

Bowens: Two [U/I].

Goff: Right. Oh, you gonna pay for it upfront? Alright, that's cool. You paying for the extra ten right now?

Bowens: No, nah, I ain't payin' for that s\*\*\*. I wish I could.

Goff: Twenty is a hundred.

Bowens: Yeah, yeah.

Goff: You're not paying for the transportation. You're doin' [U/I]. You're getting' thirty, but you're paying for twenty.

Bowens: I know, I know.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Bowens and Goff were arranging for Goff to deliver a quantity of narcotics to the South 20th Street Houses. Goff reminded Bowens that Bowens and his associates would be selling an additional quantity of narcotics on Goff's behalf in lieu of a transportation fee.

- 123. At approximately 3:31 p.m., Goff, using the Goff 7108 Phone, contacted Langley, who was using the Bowens 5626 Phone. During that conversation, Goff stated, "meet me on 19th."
- 124. At that time, law enforcement observed the Goff BMW park in the area of South 19th Street and Hopkins Place. In addition, law enforcement observed Langley exit the alleyway between 921 South 20th Street and 925

South 20th Street and walk toward South 19th Street. Surveillance units then observed Langley enter the rear seat of the Goff BMW. Moments later, Langley exited the Goff BMW and walked back to the alleyway between 921 South 20th Street and 925 South 20th Street.

125. On or about May 10, 2019, Bowens, using the Bowens 5626 Phone, contacted Goff, using the Goff 7108 Phone. During that conversation, Bowens and Goff had the following exchange:

Goff: Yeah, Fu.

Bowens: Come on, let's do this.

Goff: How much?

Bowens: Uh, what's 30?

Goff: 30. 150, 160.

Bowens: Aight.

Goff: Aight, I'ma call you when I'm closer.

Based on the content of the conversation, my training and experience, and the results of the investigation to date, Bowens and Goff were discussing the price for their narcotics transaction.