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

UNITED STATES OF AMERICA : Hon. Joseph A. Dickson
: :
v. : Mag. No. 19-6717
: :
EDWARD WILLIAMS, : **CRIMINAL COMPLAINT**
a/k/a "Fadia," : :
WALI DUNCAN, : :
a/k/a "Haneef Toler," : **FILED UNDER SEAL**
a/k/a "Remix," : :
a/k/a "Black Ass," : :
RAHIM JACKSON, : :
a/k/a "Rah," : :
ARTHUR HARDY, : :
a/k/a "Art," : :
TIESHORN FLETCHER, : :
a/k/a "X," : :
a/k/a "Fat Boy," : :
KAREEM COLLIER, : :
a/k/a "Grimey," : :
a/k/a "Grime," : :
FUQUAN BUNN, : :
a/k/a "G Fu," : :
SHYIEM GORDON, : :
a/k/a "GT," : :
MICHAEL GRAHAM, : :
a/k/a "Soulman," : :
TERRELL EVANS, : :
a/k/a "Rell," : :
ARRAHEEM WASHINGTON, : :
WILFREDO P. JIMENEZ, : :
a/k/a "Pedro Munoz," : :
a/k/a "Pedro Munoz Almonte," : :
a/k/a "Carlos Rivera" : :

I, Edward Garcia, 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, and that this complaint is based on the following facts:

SEE ATTACHMENT B

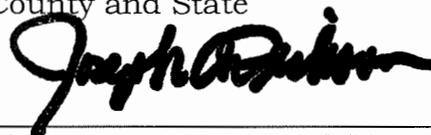
continued on the attached pages and made a part hereof.



Edward Garcia, Task Force Officer
Drug Enforcement Administration

Sworn to and subscribed in my presence, ESSEX COUNTY, NEW JERSEY
This 30th day of July, 2019 County and State

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Heroin)

From at least in or around February 2018 through on or about July 29, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

EDWARD WILLIAMS,
a/k/a "Fadia,"
WALI DUNCAN,
a/k/a "Haneef Toler,"
a/k/a "Remix,"
a/k/a "Black Ass,"
RAHIM JACKSON,
a/k/a "Rah,"
ARTHUR HARDY,
a/k/a "Art,"
TIESHORN FLETCHER,
a/k/a "X,"
a/k/a "Fat Boy,"
KAREEM COLLIER,
a/k/a "Grimey,"
a/k/a "Grime,"
FUQUAN BUNN,
a/k/a "G Fu,"
SHYIEM GORDON,
a/k/a "GT,"
MICHAEL GRAHAM,
a/k/a "Soulman,"
TERRELL EVANS,
a/k/a "Rell,"
ARRAHEEM WASHINGTON,
WILFREDO P. JIMENEZ,
a/k/a "Pedro Munoz,"
a/k/a "Pedro Munoz Almonte,"
a/k/a "Carlos Rivera,"

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

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

COUNT TWO
**(Distribution and Possession with Intent to Distribute Heroin
and Cocaine Base)**

On or about March 13, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

FUQUAN BUNN,
a/k/a "G Fu,"

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

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

COUNT THREE
**(Distribution and Possession with Intent to Distribute Heroin
and Cocaine Base)**

On or about March 27, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

TERRELL EVANS,
a/k/a "Rell,"

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

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

COUNT FOUR

(Distribution and Possession with Intent to Distribute Heroin)

On or about May 16, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

WILFREDO P. JIMENEZ,
a/k/a "Pedro Munoz,"
a/k/a "Pedro Munoz Almonte,"
a/k/a "Carlos Rivera,"

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

ATTACHMENT B

I, Edward Garcia, am a Task Force Officer with the Drug Enforcement Administration (“DEA”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and in part. Where I refer to contents of previously recorded conversations (e.g., prior wiretap interceptions) quotations and descriptions are based on preliminary draft transcripts and/or translations of those conversations. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Investigation

1. Since in or around February 2018, law enforcement has been investigating a drug trafficking organization (“DTO”) that has been distributing heroin, fentanyl, crack cocaine and other narcotics in or around various locations in Newark, New Jersey, including the Janice Cromer Village, a public housing complex also known as the Broadway Townhomes (hereinafter, the “Broadway Townhomes”). The Broadway Townhomes are located in a residential neighborhood a short distance away from two elementary schools and a high school. This investigation has consisted of, among other investigative tools, controlled purchases of narcotics, pole camera surveillance, physical surveillance and court-authorized wiretaps.

2. Based on this ongoing investigation, law enforcement has determined that the DTO is led by EDWARD WILLIAMS, a/k/a “Fadia,” (“WILLIAMS”) and WALI DUNCAN, a/k/a “Haneef Toler,” a/k/a “Remix,” a/k/a “Black Ass” (“DUNCAN”). WILLIAMS and DUNCAN are supplied by several individuals, including but not limited to RAHIM JACKSON, a/k/a “Rah” (“JACKSON”) and ARTHUR HARDY, a/k/a “Art” (“HARDY”) who deliver the narcotics to WILLIAMS either personally or through drug runners, such as WILFREDO P. JIMENEZ, a/k/a “Pedro Munoz,” a/k/a “Pedro Munoz Almonte,” a/k/a “Carlos Rivera” (“JIMENEZ”). WILLIAMS, in turn, supplies narcotics to DUNCAN, KAREEM COLLIER, a/k/a “Grimey,” a/k/a “Grime” (“COLLIER”) and others. DUNCAN, in turn, supplies TIESHORN FLETCHER, a/k/a “X,” a/k/a “Fat Boy” (“FLETCHER”), FUQUAN BUNN, a/k/a “G Fu” (“BUNN”), Shyiem Gordon, a/k/a “GT” (“GORDON”), MICHAEL GRAHAM, a/k/a “Soulman” (“GRAHAM”), TERRELL EVANS, a/k/a “Reli” (“EVANS”), ARRAHEEM WASHINGTON (“WASHINGTON”), and others.

3. DUNCAN is a high-ranking member of the street gang known as the “G-Shine Bloods,” a subset of the Bloods street gang (hereinafter, the “G-

Shine Bloods”). In addition, the investigation has revealed that WILLIAMS, COLLIER, FLETCHER, BUNN, GORDON, GRAHAM, EVANS and WASHINGTON are also members of the G-Shine Bloods.

4. The investigation has revealed that JACKSON, HARDY and WILLIAMS are all employed at a recreation center in Newark, New Jersey (the “Recreation Center”). HARDY is the director of the Recreation Center. Based on lawfully intercepted communications, as well as physical surveillance, JACKSON, HARDY and WILLIAMS have routinely used the Recreation Center as a place to receive and store narcotics.

Narcotics Distribution for the DTO

5. The DTO sold heroin that was frequently mixed with fentanyl, a potent synthetic opioid analgesic similar to, but many times stronger than morphine, that is responsible for thousands of overdose deaths. The heroin-fentanyl mixture sold by the DTO has been packaged in glassine envelopes stamped or labeled with various “brand names” in colored ink, thus allowing dealers and addicts alike to differentiate and market batches of heroin.

The WILLIAMS DTO was Supplied by JACKSON and HARDY

6. The investigation has revealed that WILLIAMS obtains narcotics from JACKSON and HARDY. For example, on or about May 3, 2019, WILLIAMS ordered 200 bricks¹ of heroin from JACKSON (“Send 200 the 50 for big man don’t want one to have”), and JACKSON responded that he would supply 150 bricks of heroin (“He said he is going to send 150”).

7. On or about May 9, 2019, at approximately 3:24 p.m., WILLIAMS informed DUNCAN that JACKSON was going to supply some samples of narcotics to WILLIAMS, who was working at the Recreation Center (“he’s about to drop me off something for us to try.”). Later that evening, during an intercepted call, WILLIAMS told DUNCAN that WILLIAMS was about to drop off the samples to DUNCAN. The next day, at approximately 1:03 p.m., DUNCAN called and told WILLIAMS that the quality of the narcotics was alright but needed to be stronger (“The training is okay. It’s okay but it ain’t better than

¹ A “deck” of heroin commonly refers to a single-dose packet, or glassine envelope, of heroin. A “bundle” of heroin commonly refers to approximately 10 decks of heroin, often packaged together. A “brick” of heroin commonly refers to approximately 50 decks, or 5 bundles, of heroin, often packaged together. One brick of heroin commonly consists of fifty individual glassine envelopes of heroin. The approximate net weight of a brick is typically 1 gram or below.

the last trainer ... I need the punch to be a little stronger.”). WILLIAMS then texted JACKSON about the quality of the heroin (“Big Man said it’s ok just need a little more punch.”).

8. On or about May 10, 2019, at 4:08 p.m., JACKSON arranged to supply WILLIAMS with 100 bricks of heroin, which WILLIAMS in turn planned to distribute to DUNCAN and COLLIER (“They said they’ll probably come through ... tomorrow like 1:00”/“He’s only gonna give him like 50 a piece.”). The following day at 8:37 a.m., JACKSON texted WILLIAMS to tell him to have the money together for the narcotics sale (“They will be here at 12 try to have everything together”).

9. On or about May 15, 2019, at approximately 3:44 p.m., JACKSON confirmed that he would be able to resupply WILLIAMS with narcotics the following day (“Yo, he said tomorrow”), and WILLIAMS indicated that he would be prepared to purchase the narcotics from JACKSON (“Alright, cool. So I’m ... let me know, uh just hit me tomorrow. That’s all.”).

10. Later that same day, WILLIAMS called several of his drug customers to inform them that he would receive a shipment of heroin the following day. For example, at approximately 4:36 p.m., WILLIAMS received a telephone call from DUNCAN, whereupon WILLIAMS confirmed that WILLIAMS’s supplier would be resupplying him with narcotics the following day (“Tomorrow, tomorrow. He told me today, tomorrow is landing tomorrow morning.”), and WILLIAMS instructed DUNCAN to be ready to purchase the narcotics from WILLIAMS once he was resupplied by JACKSON (“So just try to coordinate this shit some type of way for me. I don’t want to uh ... well ... I’m trying to coordinate this shit.”). DUNCAN responded, “Uh, I’m a call you ... I got the kids in the car, let me get them uh home and then I’ll call you back.” At approximately 5:27 p.m., WILLIAMS called COLLIER to inform him that WILLIAMS would be resupplied the following day (“ ... be on point for tomorrow ... he said tomorrow.”). COLLIER, who was frustrated with the speed in which WILLIAMS could obtain narcotics, stated that he was going to obtain the narcotics from another supplier (“ ... I ain’t even gonna front bro ... I ain’t even going to say nothing. I’m just going to do it myself. I ain’t really got time for that shit bro. I don’t even care.”).² At 6:58 p.m., WILLIAMS received a call from an unidentified drug customer (“UM-1”), and WILLIAMS inquired about the quantity of heroin that the customer wanted (“ ... how many you trying to get?”), and UM-1 responded, “like 50.” Shortly thereafter, UM-1 called WILLIAMS to inquire about the cost per brick of heroin, and WILLIAMS

² The following afternoon, COLLIER called WILLIAMS and asked if WILLIAMS had received the narcotics (“you a’ight?” and “so when he ready,” referring to WILLIAMS being resupplied with heroin by WILLIAMS’s supplier).

responded, "105 man," or \$105 per brick. UM-1 then ordered a "ten piece," or 10 bricks of heroin. WILLIAMS then texted JACKSON and ordered 20 additional bricks of heroin ("Need 20 more").

11. The following day, JACKSON attempted to supply 225 bricks to WILLIAMS. During a lawfully intercepted conversation on May 16, 2019, at approximately 10:47 a.m., JACKSON informed WILLIAMS that JACKSON would be supplying WILLIAMS with 225 bricks of heroin ("He bringing you 225"), and the heroin would be delivered in "like 20-25 minutes" by JIMENEZ. Thereafter, law enforcement conducted physical surveillance of JIMENEZ, who placed several pieces of luggage in his vehicle. At approximately 11:05 a.m., law enforcement conducted a lawful traffic stop. After obtaining written consent, among other things, law enforcement recovered approximately 230 bricks of suspected heroin and drug paraphernalia from inside a hidden compartment in the vehicle, whereupon JIMENEZ was arrested. Subsequent laboratory analysis confirmed that the substance seized from JIMENEZ was, in fact, heroin and fentanyl with a net weight of approximately 220 grams.

12. Between on or about May 23, 2019, and May 24, 2019, on DUNCAN's behalf, WILLIAMS arranged to purchase narcotics from HARDY. During a lawfully intercepted call on May 23, 2019, DUNCAN told WILLIAMS that DUNCAN had "46," or \$4,600, to purchase narcotics. Shortly thereafter, WILLIAMS texted HARDY, "He got a couple stacks laying around," meaning that DUNCAN had money to purchase narcotics from HARDY. On or about May 24, 2019, at approximately 7:00 p.m., WILLIAMS called DUNCAN to inform DUNCAN that WILLIAMS was about to be resupplied ("Yeah, we ready."). Approximately 30 minutes later, HARDY called WILLIAMS to tell WILLIAMS that he was "on my way to you. I'll be like five minutes." Meanwhile, law enforcement was conducting physical surveillance and saw WILLIAMS arrive at the Recreation Center at approximately 7:35 p.m. After WILLIAMS arrived at the Recreation Center, WILLIAMS texted DUNCAN to inquire when DUNCAN wanted to pick up the narcotics from WILLIAMS ("You trying get that now."), and DUNCAN indicated that he would pick up the narcotics in an "[h]our." Shortly thereafter, HARDY arrived at the Recreation Center carrying several weighted yellow plastic bags. HARDY carried the weighted plastic bags into the Recreation Center. A few minutes later, law enforcement saw WILLIAMS leave the Recreation Center carrying the weighted yellow plastic bags. The following day, law enforcement conducted physical surveillance and saw WILLIAMS meet with DUNCAN and place a yellow plastic bag in the trunk of DUNCAN's car.

13. On or about June 10, 2019, WILLIAMS ordered 100 bricks of heroin from HARDY ("Old boy wants a hundred"), who wanted to know if WILLIAMS's customer had the money to purchase the narcotics ("He got bread though?"). WILLIAMS indicated that his customer would have the money ready and wanted to know how quickly HARDY could supply the heroin ("How long

until you get it to him? So I can tell him. I'ma get that bread.”). The following day at approximately 1:02 p.m., COLLIER called WILLIAMS to arrange the purchase of narcotics from WILLIAMS. COLLIER agreed to purchase heroin (“I’ll just take 50, 60, 70 it don’t matter.”), but WILLIAMS explained that he was unsure how much HARDY was going to be able to supply (“I know he said he ain’t go the whole 100, but he got like 80 ... It’s close to 100.”). Shortly thereafter, WILLIAMS texted COLLIER, “50,” confirming that WILLIAMS was supplying COLLIER with 50 bricks of heroin. COLLIER then called WILLIAMS, who confirmed the brand of the heroin (“He saying it’s fire. It’s a red stamp. I don’t know the name of the shit.”). COLLIER asked WILLIAMS for his whereabouts to retrieve the narcotics, and WILLIAMS confirmed that he was at the Recreation Center (“I’m at the job.”).

14. On or about June 30, 2019, at approximately 8:48 a.m., HARDY advised WILLIAMS that he was on his way to deliver heroin, stamped in “red,” to WILLIAMS. HARDY inquired if he wanted “50 or 100,” referring to 50 or 100 bricks of heroin. WILLIAMS responded, “It’s up to you. You could give him the whole thing. He, he gonna go through it ... he’s mad as hell, he’s been looking for mad days,” referring to the fact that DUNCAN was willing to purchase 100 bricks of heroin.

15. Minutes later, law enforcement established surveillance at the Broadway Townhomes. At approximately 9:15 a.m., HARDY called WILLIAMS to tell WILLIAMS to meet HARDY outside of WILLIAMS’s residence. Shortly thereafter, law enforcement saw HARDY arrive, exit his vehicle (a silver Chevy Malibu), open the trunk and hand WILLIAMS a weighted plastic bag. Shortly thereafter, WILLIAMS texted DUNCAN to inform him that “it landed,” meaning that WILLIAMS had been resupplied with narcotics.

JACKSON used Runners to Conduct his Drug Trafficking Business

16. Between on or about May 3, 2019, and on or about May 4, 2019, law enforcement lawfully intercepted telephone conversations and text messages between JACKSON and WILLIAMS, during which WILLIAMS placed an order for approximately 200 bricks of heroin, but JACKSON was only able to supply approximately 120 bricks of heroin. WILLIAMS eventually supplied some of the heroin to DUNCAN and COLLIER.

17. However, DUNCAN was displeased with the quality of the narcotics provided by JACKSON and arranged for the narcotics to be returned. On or about May 8, 2019, during a lawfully intercepted telephone conversation JACKSON informed WILLIAMS that he would be sending someone to pick up the narcotics from WILLIAMS. A short time after JACKSON and WILLIAMS spoke, law enforcement saw WILLIAMS walking in the area of McCarter Highway in Newark, New Jersey, carrying a small canvas bag. Law enforcement maintained surveillance of WILLIAMS as he walked into a

laundromat ("Location-1") before exiting and quickly entering JIMENEZ's vehicle. WILLIAMS remained in JIMENEZ's vehicle for a matter of seconds, before quickly exiting without the canvas bag and departing on foot. In other words, WILLIAMS was returning the narcotics of poor quality to JIMENEZ, one of JACKSON's drug runners.

18. Similarly, on or about May 11, 2019, law enforcement saw WILLIAMS and JIMENEZ arrive separately at Location-1. WILLIAMS entered JIMENEZ's vehicle empty handed and quickly exited JIMENEZ's vehicle carrying a black shopping bag.

19. Once again, on or about May 13, 2019, JACKSON and WILLIAMS discussed the need for JACKSON to take back additional narcotics that JACKSON had supplied that were poor quality. During that call, JACKSON arranged for JIMENEZ to pick up the heroin from WILLIAMS. Shortly thereafter, law enforcement observed JIMENEZ's vehicle, and WILLIAMS in the area of Location-1. WILLIAMS was observed retrieving a large yellow plastic bag from the back seat of his vehicle and placing the plastic bag into JIMENEZ's vehicle.

WILLIAMS Supplied DUNCAN, COLLIER and Others

20. On or about March 25, 2019, at approximately 2:20 p.m., WILLIAMS agreed to resupply DUNCAN with narcotics. DUNCAN spoke to WILLIAMS and inquired if DUNCAN could retrieve something from WILLIAMS ("Is the morning good for you or you still want to go today?"), and WILLIAMS responded that they should try to complete the transaction that day ("Tomorrow that shit is gonna be crazy up there"/"Today is better."). They later agreed to meet at the Recreation Center. While conducting physical surveillance at the Recreation Center, law enforcement saw DUNCAN arrive at the Recreation Center. Upon DUNCAN's arrival, WILLIAMS removed a weighted plastic bag from WILLIAMS's vehicle, entered DUNCAN's vehicle and quickly exited DUNCAN's vehicle. DUNCAN then drove to his stash location, specifically a storage facility in Newark, New Jersey (the "Storage Facility"), whereupon DUNCAN retrieved the same weighted plastic bag from his vehicle, entered the Storage Facility with the plastic bag and then exited the Storage Facility moments later without the plastic bag. DUNCAN then called WILLIAMS to complain about how WILLIAMS conducted the narcotics transaction ("You gotta start, you gotta start keeping like a little clothing bag or something. That shit right there ... [i]f I get stopped, that'll look crazy.").

21. The investigation has revealed that WILLIAMS supplied DUNCAN with narcotics that WILLIAMS obtained from JACKSON and HARDY. For

example, as set forth in paragraph 8 above, JACKSON supplied WILLIAMS with 100 bricks of heroin on or about May 10, 2019.

22. Based on the investigation, WILLIAMS also supplied COLLIER with narcotics. For example, on or about May 3, 2019, at approximately 12:12 p.m., COLLIER called WILLIAMS to order additional narcotics. WILLIAMS explained that he had samples from his supplier that WILLIAMS wanted to give to COLLIER ("I'm at the job ... I got something for you. He said [sic] us, he said the what's the name a'int gonna be completed. He want to give you, make sure you good."/"The whole order wasn't completed so he want to give you these just to uh just to uh, put them out see if you like it."). COLLIER asked for the brand of heroin and the quantity available ("What is it?"/"What's the name of it?"/"How many?"). WILLIAMS responded that he didn't know "the name," but told COLLIER to be ready with the money to purchase the narcotics the following day ("And tell mother fuckers tomorrow morning, bright and early and shit. He on my ass now. Shit, this shit gotta get, gotta be correct. It gotta be fucking on point."). COLLIER told WILLIAMS that he would be ready with the money to buy the narcotics ("And I got all this bread, man.").

23. The following day at 11:49 a.m., WILLIAMS called COLLIER to tell him that WILLIAMS's supplier, JACKSON, would be ready at 2:00 p.m., and COLLIER complained that WILLIAMS's supplier would not be able to "handle" the volume of narcotics needed by WILLIAMS's DTO ("I'm starting not to like him ... It's always four days, man. Like that shit like ... I don't think he can handle us, though. Real talk."). COLLIER picked up the narcotics from WILLIAMS, who was working at the Recreation Center at the time ("I'm at the job"/"I'ma bout to pull up ... I'll be um ... come outside in three minutes."). Shortly thereafter, COLLIER called WILLIAMS at approximately 2:19 p.m., to complain about the quantity of heroin supplied by WILLIAMS's supplier ("118. He ain't even on point."). WILLIAMS told COLLIER that WILLIAMS had counted the narcotics, and COLLIER was supplied with 120 bricks of heroin ("We counted them. 120 is what I counted."). One minute later, COLLIER called WILLIAMS to tell him that WILLIAMS had correctly counted the quantity of heroin ("Yo. You're right, he double counted it."). COLLIER still told WILLIAMS that he did not like WILLIAMS's supplier because WILLIAMS had ordered 150 bricks ("you still told him 150"), but JACKSON only was able to deliver 120 bricks even though JACKSON had promised to supply 125 bricks of heroin.

24. Two days later, on or about May 6, 2019 at 11:49 a.m., COLLIER called WILLIAMS to complain about the quality of the heroin supplied by JACKSON ("We got a problem my boy ... 'Cause my people ain't feeling it. They said they don't like what they, how it making them feel. They don't like what they cut it with."). Over the course of the following days, COLLIER continued to complain about the heroin supplied by JACKSON, telling JACKSON that the heroin was only liked by addicts who injected it, but disliked by addicts who

snorted it (“Saying is the color man, is the color.”/“It’s just only for the arms. It ain’t for the nose.”). As set forth in Paragraphs 17 and 19, above, WILLIAMS arranged to return the heroin to JACKSON.

25. On or about June 9, 2019, at approximately 10:59 p.m., COLLIER, called WILLIAMS, who asked COLLIER if COLLIER wanted WILLIAMS to supply him with narcotics (“You want me to, uh, holla at my man?”), and COLLIER answered affirmatively (“You know if I’m calling, you know what it is.”/“Yeah, yeah, yeah, yeah, yeah, yeah, yeah, yeah.”). As set forth above in paragraph 13, WILLIAMS arranged to purchase the heroin ordered by COLLIER from HARDY.

26. On or about June 11, 2019, at approximately 1:02 p.m., WILLIAMS called COLLIER to tell COLLIER that WILLIAMS was ready to supply COLLIER with narcotics as long as COLLIER provided the money to purchase the narcotics (“Yeah man, we uh, old boy right here, you know, everything is ready to go. They waiting on you.”), and COLLIER inquired about the brand of heroin that would be supplied (“So what’s the name?”). As set forth in paragraph 13, above, HARDY supplied WILLIAMS and COLLIER with heroin that same day. COLLIER expressed his concern to WILLIAMS about the brand of heroin supplied by HARDY (“But it’s blue. We never had no blue one, man.”).

27. Likewise, on or about June 11, 2019 at 3:51 p.m., WILLIAMS called GORDON to offer to supply GORDON with two bricks of heroin (“I had ran across two things, man. See if you was into it.”). GORDON confirmed it was heroin (“... the D,³ right?”) and agreed to purchase the heroin for further distribution (“Aight, bet. I’m a come get ‘em.”).

28. On or about June 24, 2019, at approximately 12:14 p.m., COLLIER called WILLIAMS. During the conversation, WILLIAMS told COLLIER that his supplier was going to give them some heroin samples (“... he is about to have 10 coming, coming our way. He is setting some samps or something.”). COLLIER and WILLIAMS discussed that there had been a shortage of heroin (“it’s been dry, man”) ever since a recent overdose death that was likely caused by the presence of fentanyl (“But it’s been dry then that ... ‘O’ [phonetic] died, man.”/“And he definitely had that Fetty, man.”). The next day WILLIAMS called COLLIER to let him know that WILLIAMS had received the samples. COLLIER commented about some heroin not containing fentanyl (“And I swear bro, they ain’t no Fetty whopping that shit. It’s all ... it’s dope, it’s brown.”), and WILLIAMS responded that all heroin contains some fentanyl (“He said everybody is dropping a little Fetty in there.”).

³ “D” refers to diesel, a street term for heroin.

29. On or about June 25, 2019 at approximately 8:37 p.m., WILLIAMS called GORDON to offer to sell GORDON one brick of heroin (“I had ran across one, man.”/“Yeah, it’s only one. But it’s more coming ...”). GORDON agreed to purchase the heroin (“Alright bet. Give me a few minutes and I’ll come grab it.”).

Members of the DTO Conducted Street Sales of Narcotics and Collected Narcotics Proceeds

30. DUNCAN supplied several individuals with narcotics, who in turn conducted street-level narcotics sales. For instance, on or about December 13, 2018, at approximately 1:30 p.m., via text message, a confidential source (“CS”) with a history of reliability and credibility ordered two bricks of heroin from DUNCAN (“Yo I need 2”). DUNCAN directed the CS to meet with “X,” referring to FLETCHER (“Yeah you could X down here he got.”/“Just call me when you get close so I can call him.”). Thereafter, the CS met with “X”, i.e., FLETCHER, near the Broadway Townhomes, and FLETCHER sold the CS two bricks of a substance that subsequently tested positive for heroin and fentanyl. The controlled buy was recorded by law enforcement, and law enforcement monitored the sale using physical surveillance.

31. On or about January 10, 2019, DUNCAN resupplied GRAHAM with narcotics. Law enforcement conducted physical surveillance as DUNCAN picked up a co-conspirator (“CC-1”)⁴ from the Broadway Townhomes. Thereafter, DUNCAN and CC-1 drove to the Storage Facility. DUNCAN exited his vehicle and entered the Storage Facility while CC-1 remained in the vehicle. Less than 15 minutes after arriving at the Storage Facility, DUNCAN and CC-1 drove back to the Broadway Townhomes. GRAHAM exited the parking lot of the Broadway Townhomes and entered DUNCAN’s vehicle, where GRAHAM remained with DUNCAN and CC-1 for a few minutes. GRAHAM and CC-1 then exited DUNCAN’s vehicle and walked back to the Broadway Townhomes.

32. On or about February 28, 2019, at approximately 2:12 p.m., FLETCHER called DUNCAN in response to a text message that DUNCAN had sent FLETCHER. DUNCAN asked FLETCHER if he needed more heroin (“[T]he four is [sic] ready, you still have floors left?”), and FLETCHER responded that he had a little over a brick of heroin left (“I have one and a half left.”).

33. On or about March 2, 2019, at approximately 5:35 p.m., DUNCAN called FLETCHER to inquire about heroin sales and whether anyone had complained about the quality of heroin supplied by the DTO (“Chita was ... the

⁴ In or around April 2019, CC-1 was charged by federal criminal complaint with the possession of a firearm as a convicted felon.

only one that had something so far ... but Rob, they ain't nobody complaining to Rob."). A few minutes later, specifically at approximately 5:48 p.m., BUNN called DUNCAN to discuss their heroin distribution and co-conspirators. In particular, BUNN and DUNCAN discussed particular brands of heroin being distributed by BUNN ("[I]t was just 'Taco Bell' and something else. But I heard that shit got caught up, too. So we got something called 'Something Boy,' [referring to the 'Oh Boy' stamp] and, uh, another name, but, uh, ... I just, uh, gave out, I just gave out a bunch."). DUNCAN and BUNN also discussed the failure of particular co-conspirators to give DUNCAN their narcotics proceeds ("Punk ... goes and sees Fat Boy [i.e. FLETCHER] and only gives [FLETCHER] the money that he owes and gets something, and gets something else. I said yeah tell that n**** to give me my money. Or give me my shit back."). DUNCAN told BUNN that the person that they were complaining about was also failing to give money to COLLIER ("He be doing Grimey [i.e., COLLIER], he be doing shiesty stuff, bruh.").

34. On or about March 3, 2019, GORDON texted DUNCAN: "I gave him ur 420," thereby informing DUNCAN that GORDON had paid another co-conspirator money that GORDON owed to DUNCAN for narcotics.

35. On or about March 5, 2019, BUNN called DUNCAN to discuss preparing crack cocaine for distribution. Specifically, DUNCAN asked BUNN if he was going to prepare the crack cocaine for distribution ("You gonna go grab that shit and put that shit together?"). DUNCAN instructed BUNN to prepare the narcotics and give them to FLETCHER ("Just um, just uh grah'em up, uh just grah'em up and leave them with Fat Boy [i.e., FLETCHER]").

36. On or about March 6, 2019, at approximately 1:17 p.m., GORDON called DUNCAN to complain about the heroin that DUNCAN had been supplying ("I still had the red ones, I just got like rid of them yesterday to my peoples and they said they didn't like that one."). DUNCAN informed GORDON that he had additional heroin to supply ("I got the green. I got the green one, the green one that shit is on. They like the green ones I got."). At approximately 2:38 p.m., DUNCAN received a call from GORDON, who asked DUNCAN to supply GORDON with narcotics ("Can I see you?"), which DUNCAN agreed to do ("Uh ... regular rotation?"). GORDON replied via text message, "I was calling to [sic] so we can up it," meaning that GORDON wanted to purchase more narcotics than usual. DUNCAN asked, "What number," and GORDON responded, "I was going buy [sic] five," meaning that GORDON was planning to purchase five bricks of heroin. Later that day, DUNCAN texted GORDON to let him know that DUNCAN was en route to deliver the heroin ("Omw," or on my way).

37. Shortly after arranging to resupply GORDON, DUNCAN called FLETCHER to inquire about the payment of narcotics proceeds by members of

the DTO and whether FLETCHER needed to be resupplied with more narcotics. Specifically, on or about March 6, 2019, at approximately 2:34 p.m., DUNCAN asked FLETCHER if everyone had paid narcotics proceeds to FLETCHER, who in turn would give the narcotics proceeds to DUNCAN ("All of them give you the money?"/"He got six ... He had 10 floors of money, but he gave money for four floors. So you're telling me all six. All, none of them didn't give you no money back?"). Approximately 30 minutes later, DUNCAN called FLETCHER to ask, "You need your floors?," and FLETCHER responded that he was "ready." DUNCAN and FLETCHER then discussed the quantity of heroin that FLETCHER wanted to order from DUNCAN ("I bringing the dub or 15?,") and FLETCHER ordered 15 bricks of heroin ("Uh, you can just bring 15.").

38. On or about March 7, 2019, at approximately 1:30 p.m., while conducting physical surveillance at the Broadway Townhomes, law enforcement saw GORDON conduct several hand-to-hand transactions near the Broadway Townhomes on Broad Street in Newark, New Jersey. At approximately 2:13 p.m., GORDON called DUNCAN and asked DUNCAN to resupply him ("You got any red like good ..."). DUNCAN told GORDON that DUNCAN could resupply him ("Yeah, it's some of the red one. It's the ones you had. You said you ain't them ones right?"). GORDON informed DUNCAN that GORDON had received a request from a drug customer ("Yeah but somebody just text my phone requesting that."). DUNCAN agreed to resupply GORDON with five bricks of heroin ("I'ma bring you five them just keep the others too. I'ma bring you five of them."). DUNCAN then called FLETCHER to inform him that DUNCAN was going to be in the area to resupply GORDON. At approximately 2:34 p.m., DUNCAN called GORDON to tell GORDON that DUNCAN was in the area, and GORDON asked to "trade" in five bricks of heroin for the five bricks that DUNCAN was delivering. DUNCAN told GORDON to keep the additional five bricks of heroin because DUNCAN wanted GORDON's "numbers up anyway," meaning that DUNCAN wanted GORDON to sell more heroin. Within seconds, law enforcement saw DUNCAN arrive near the Broadway Townhomes. GORDON approached DUNCAN's vehicle and reached inside to retrieve an item. After DUNCAN departed the area, GORDON continued to sell narcotics. Law enforcement stopped several drug customers, who were in possession of suspected heroin and/or crack cocaine.

39. Within minutes of resupplying GORDON, DUNCAN resupplied FLETCHER. On or about March 7, 2019, at approximately 2:35 p.m., DUNCAN called FLETCHER to tell him that DUNCAN was pulling into the parking lot, and FLETCHER told DUNCAN that he was coming to retrieve the narcotics that DUNCAN was delivering to FLETCHER ("Alright, I'm right here cause I'm dirty.").

40. On or about March 10, 2019, at approximately 6:41 p.m., DUNCAN called BUNN to inquire if BUNN needed to be resupplied ("You good

for the day or you need me to slide through?”). BUNN responded that they had enough narcotics to sell but would need additional narcotics the following day (“Tomorrow we gonna need definitely. We gonna definitely need tomorrow.”).

41. On or about March 12, 2019, at approximately 5:05 p.m., BUNN called DUNCAN to discuss their narcotics distribution activities. DUNCAN commented on the drugs prepared by BUNN (“Yo, you know that shit you gave me is only for, only 11.5, 11.4.”), and BUNN apologized about the weight of the drugs that he had prepared with cutting agents (“I ain’t have no scale, man. My bad.”). BUNN told DUNCAN that he had prepared 25 vials of crack cocaine (“He got 25 girls, bruh. Yeah, 25 left. I just dropped them shits off a little while ago.”). DUNCAN responded that they could prepare more narcotics for distribution the next day (“I ain’t touching shit. I’ll do the rest tomorrow so ... hit me when you’re done.”) The following day, BUNN reported to DUNCAN that he had finished preparing the narcotics, and it was a good thing because the members of the DTO were selling the narcotics quickly (“They looking for them shits left and right, good thing we added 25. I gave him 10 and I was doing the 15 I just dust them shits.”/“The shits done that I had ... I went right through them shits.”).

42. On or about March 13, 2019, at approximately 2:00 p.m., law enforcement began conducting physical surveillance at the Broadway Townhouses. Shortly thereafter, law enforcement saw FLETCHER meet with WASHINGTON and then move toward the rear of the Broadway Townhouses where law enforcement subsequently saw members of the DTO conduct hand-to-hand transactions, as set forth below. Approximately an hour later, WASHINGTON met with four individuals, one of whom was positively identified as GORDON. WASHINGTON reached into a bag that was in his possession and handed several small objects to GORDON and the three other individuals. GORDON and the other individuals walked toward Broad Street, whereupon they engaged in several hand-to-hand transactions. WASHINGTON entered a parked red minivan (the “Minivan”) and was seen moving around the Minivan near the center console. WASHINGTON then exited the Minivan and walked toward the rear of the Broadway Townhouses. Less than an hour later, WASHINGTON emerged from the Broadway Townhouses, stopped at a location and made several hand gestures, whereupon one of the four males that met with WASHINGTON a couple of hours before, handed a black plastic bag to WASHINGTON. Thereafter, WASHINGTON met with FLETCHER. Once again, WASHINGTON and FLETCHER walked toward the rear of the Broadway Townhouses.

43. That same afternoon at approximately 4:54 p.m., DUNCAN called FLETCHER to inform FLETCHER that the members of the DTO had to sell more narcotics, and they could take narcotics on credit as long as they paid DUNCAN back later (“I’ma about to bring some girls down there and I got some

shits that everybody gotta do everyday too ... I told little bro to tell everybody to do ... I think it was three or either five girls a day ... you know what I mean, for a Kitty, and if they need something they can come get it, but they gotta put it back.”). After DUNCAN’s call to FLETCHER, law enforcement continued to see members of the DTO sell narcotics. Indeed, at approximately 5:00 p.m. that evening, law enforcement saw GORDON engage in a hand-to-hand transaction with an individual, who was later stopped and arrested for possessing 10 glassine envelopes of suspected heroin stamped “Ole Boy” in green ink and a vial of suspected crack cocaine. At approximately 5:02 p.m., FLETCHER called DUNCAN to see if DUNCAN could supply the DTO with a particular brand of heroin (“I was trying to see ... you ain’t got none of them green ones laying around do you ... ‘cause I only got like, I got four of the red ones left, that’s all I got left, it’s the red ones. I don’t have any more greens some through they asking for them.”). DUNCAN resupplied FLETCHER at approximately 6:40 p.m. By approximately 7:57 p.m., FLETCHER had already distributed some of the narcotics to members of the DTO to sell (“Yo, I’m looking for this one. I ain’t seen this one n**** ... Soul [GRAHAM] got his. I told him what you said [about increasing the narcotics sales] too.”).

44. On or about March 14, 2019, GORDON ordered more heroin from DUNCAN (“I need give more of the red joints.”). DUNCAN asked GORDON if GORDON also wanted to get his regular quantity of heroin (“You want to do the regular or you want me to put the others ones on top?”), but GORDON only wanted to order “five red ones” because he still had the “green ones,” referring to the stamps on the heroin supplied by DUNCAN. Later that afternoon, DUNCAN suggested that GORDON trade some of his heroin with FLETCHER because he had “a lot of red,” but GORDON told DUNCAN that he wanted “the whole 15 again,” or 15 bricks of heroin.

45. On or about March 19, 2019, while conducting physical surveillance at the Broadway Townhomes, law enforcement saw GRAHAM direct a drug customer (“Buyer-1”) to the rear of the Broadway Townhomes, where law enforcement saw GRAHAM engage in a hand-to-hand transaction with Buyer-1. Upon departing the Broadway Townhomes, law enforcement stopped Buyer-1, who was found to be in possession of 10 glassine envelopes of suspected heroin stamped “Hell Yeah” in red ink. Approximately an hour later, another buyer (“Buyer-2”) was directed to the rear of the Broadway Townhomes, where GRAHAM had conducted the previous drug sale. Law enforcement observed GRAHAM engage in a hand-to-hand transaction with Buyer-2. After Buyer-2 departed the area, law enforcement stopped Buyer-2 and recovered one glassine envelope of suspected heroin stamped “Hell Yeah” in red ink. Shortly thereafter, DUNCAN arrived to resupply the members of the DTO. Law enforcement saw DUNCAN meet with GRAHAM, FLETCHER and WASHINGTON. DUNCAN reached into his vehicle and retrieved a white bag,

which DUNCAN placed inside the Minivan occupied by WASHINGTON and another individual.

46. On or about March 21, 2019, at approximately 6:32 p.m., GORDON called DUNCAN and informed DUNCAN that GORDON was going to give narcotics proceeds to FLETCHER on DUNCAN's behalf ("I'ma 'bout to, um, hand X some money for you, 'cuz I was about to leave from out here so I'ma 'bout to get him, um, some money."). DUNCAN told GORDON that DUNCAN was ready to supply GORDON with additional narcotics ("I only called you cuz shit ready."). GORDON confirmed that he would pay for the additional narcotics ("I'ma bout to hand him, 'cuz I got 700 on me right now. I'ma 'bout to give that shit to him and then, once I finish, I'll get the rest.").

47. On or about March 24, 2019, at approximately 6:02 p.m., DUNCAN called GORDON. GORDON told DUNCAN that he needed more heroin ("I ain't gonna have no uh, no D."). DUNCAN agreed to resupply GORDON ("Okay A'ight. I'll be down there."). Approximately 30 minutes later, DUNCAN called GORDON and told him to get the additional heroin that GORDON needed from FLETCHER ("Get with Fat Boy [i.e., FLETCHER] he got you covered.").

48. On or about March 26, 2019, at approximately 4:50 p.m., over several text messages, GORDON complained that he did not owe any money to DUNCAN for narcotics supplied to GORDON by DUNCAN ("But idk I gave u ur 1400 ..."/"I don't owe nobody anything so I'm lost."). In addition, GORDON told DUNCAN that GORDON was going to give 15 bricks of heroin to FLETCHER because GORDON had been holding 20 bricks of heroin for FLETCHER, five of which DUNCAN had delivered to GORDON earlier ("2/2 00 and that was it and u gave me 5 and I didn't bring my can out so ima just give X the 15 joint that was left in my can I'm bout to give to him.").

49. On or about April 3, 2019, at approximately 10:23 a.m., FLETCHER called DUNCAN to ask him to resupply the DTO members with narcotics. At approximately 2:21 p.m., DUNCAN called FLETCHER to let him know that he was about to come to the Broadway Townhomes to supply FLETCHER with narcotics ("I'm about to come out there. I'm on my way."). That evening at approximately 7:06 p.m., DUNCAN called FLETCHER to arrange to pick up the narcotics proceeds and to ask if the DTO members would need more narcotics for the following day ("I gotta come get that shit to put together. You put it ... they good for today, you gonna need it for tomorrow, right?").

50. On or about May 9, 2019, at approximately 9:11 a.m., FLETCHER called WILLIAMS to comment on the quality of drugs supplied by the DTO (" ... they're scared of the color ... I don't like that color.").

Controlled Buys of Heroin from DTO Members

51. Between on or about February 26, 2018, and on or about May 8, 2019, using several confidential sources, law enforcement conducted numerous controlled purchases of heroin from members of the DTO, including as discussed below from or through COLLIER, DUNCAN, BUNN, FLETCHER and GORDON. Prior to each controlled purchase, with the exception of the May 2018 sale, law enforcement officers outfitted each CS with an audio transmitter, an audio and/or video recording device, and documented U.S. currency.⁵ These controlled purchases are outlined in the chart below:

Date of Transaction	Target Subject(s) Involved in Transaction	Quantity Purchased	Substance Confirmed by Laboratory
Feb. 2018	COLLIER	1 brick	Heroin
March 2018	COLLIER	4 bundles	Heroin
May 2018	DUNCAN, BUNN	10 bricks	Heroin and Fentanyl
June 2018	DUNCAN	10 bricks	Heroin and Fentanyl
July 2018	BUNN	6 bricks	Heroin and Fentanyl
July 2018	DUNCAN	11 bricks	Heroin and Fentanyl
July 2018	DUNCAN, FLETCHER	4 bricks	Heroin and Fentanyl
Aug. 2018	DUNCAN	8 bricks	Heroin and Fentanyl
Sept. 2018	DUNCAN	10 bricks	Heroin and Fentanyl

⁵ Due to technological issues, the video and audio recording equipment failed for the February 2018 heroin transaction.

Date of Transaction	Target Subject(s) Involved in Transaction	Quantity Purchased	Substance Confirmed by Laboratory
Sept. 2018	DUNCAN	8 bricks	Heroin and Fentanyl
Oct. 2018	DUNCAN, FLETCHER	3 bricks of heroin and 30 vials of suspected cocaine base ⁶	Heroin and Fentanyl
Nov. 2018	DUNCAN	8 bricks	Heroin and Fentanyl
Dec. 2018	DUNCAN, FLETCHER, Individual-1	2 bricks	Heroin and Fentanyl
Jan. 2019	DUNCAN	2 bricks	Heroin and Fentanyl
Jan. 2019	GORDON	2 bricks	Heroin and Fentanyl
May 2019	COLLIER; Individual-2 ⁷	Approx. 2 bricks and 3 bundles	Heroin and Fentanyl

⁶ The laboratory did not test the suspected cocaine base.

⁷ On or about May 9, 2019, Individual-2 was arrested for, among other offenses, the unlawful possession of a handgun and possession of heroin. Individual-2 subsequently was charged with homicide.

Seizures From Members of the DTO

March 13, 2019 Seizure from Fuquan Bunn

52. On or about March 13, 2019, at approximately 1:10 a.m., law enforcement conducted a traffic stop because, among other things, they observed a silver vehicle ("Vehicle 1") with illegal tints. After Vehicle 1 pulled into a gas station, law enforcement approached Vehicle 1, whereupon they could smell the strong odor of marijuana. The driver—who was identified as BUNN—was unable to produce a valid driver's license. Due to the smell of marijuana, BUNN was ordered out of Vehicle 1 and asked if there was anything inside Vehicle 1. BUNN admitted that he had smoked marijuana earlier. A search of the vehicle revealed, among other items, approximately 466 glassine envelopes of heroin, raw uncut cocaine and jugs of cocaine. Following the administration of *Miranda* warnings, BUNN admitted that he was a "dope dealer" during the intake process at police headquarters. Subsequent laboratory analysis confirmed that the seized narcotics included approximately 7 grams of heroin and approximately 14 grams of cocaine base.

53. Following the March 13 seizure, members of the DTO discussed BUNN's arrest during lawfully intercepted conversations. For example, WILLIAMS and DUNCAN discussed the fact that BUNN had been stopped by law enforcement in possession of "10 floors" and "80 girls," referring to 10 bricks of heroin and 80 vials of crack cocaine.

March 27, 2019 Seizure from Terrell Evans

54. On or about March 27, 2019, at approximately 1:30 p.m., law enforcement established surveillance at the Broadway Townhomes, whereupon they saw TERRELL EVANS, a/k/a "Rell" ("EVANS") conduct several hand-to-hand transactions. Prior to the narcotics sales, EVANS entered a parked white Chevy Impala (the "Impala"). After EVANS served a drug customer at approximately 2:50 p.m., law enforcement stopped the buyer and found that the drug customer was in possession of a single glassine envelope of suspected heroin, whereupon the buyer was arrested. Meanwhile, EVANS was observed meeting with FLETCHER, WASHINGTON and CC-1. EVANS was arrested and advised of his *Miranda* warnings, whereas FLETCHER, WASHINGTON and CC-1 were released from the scene. EVANS admitted that he had "a few bricks and two clips" in the Impala. Pursuant to written consent, law enforcement searched the Impala and recovered approximately 170 glassine envelopes of heroin and 24 vials of crack cocaine. Following the arrest, FLETCHER called DUNCAN to inform DUNCAN that EVANS had been arrested, and warned DUNCAN not to come to the area to resupply FLETCHER as previously arranged ("Yeah, hold, hold right ... they just ran down on all of us and they got Young Money"/"A'ight, stay there.").

May 16, 2019 Seizure from Wilfredo Jimenez

55. As discussed in paragraph 11, on or about May 16, 2019, law enforcement seized approximately 220 grams of a substance that contained heroin and fentanyl from JIMENEZ during a traffic stop. At the time law enforcement intercepted the narcotics, JIMENEZ was acting as a drug runner for JACKSON and was attempting to provide the approximately 230 bricks of heroin to WILLIAMS.

May 30, 2019 Seizure from Arraheem Washington

56. On or about May 30, 2019, law enforcement executed a search warrant at a residence in Newark, New Jersey (the "Residence"). WASHINGTON was one of several individuals inside the Residence at the time of the search. Inside the Residence, law enforcement recovered a .45 caliber machine gun and numerous rounds of ammunition, including hollow point bullets. Law enforcement also recovered suspected narcotics from the Residence, including approximately 99 jugs of suspected crack cocaine and approximately 137 glassine envelopes containing suspected heroin.