
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Mag. No. 19-1564 (DEA)

TALIB CONWAY,

a/k/a "Dolla,"

a/k/a "Rock-a-Dolla,"

a/k/a "Rock,"

a/k/a "Dolla Shine,"

a/k/a "DS";

TERON HUGGINS,

a/k/a "Goog";

JERROD EPPS,

a/k/a "Ed Mu,"

a/k/a "Ed Muh,"

a/k/a "Ed Moo,"

a/k/a "Eddie Moo,"

a/k/a "Chaz Epps";

MICHAEL LINARES,

a/k/a "Milk,"

a/k/a "Big Blood";

ALLAN SIMEON,

a/k/a "Alione";

JOAQUIN SIMERON,

a/k/a "Joaq";

JAMARL SIMERON,

a/k/a "Marl";

JAWAN PAXTON,

a/k/a "Semi,"

a/k/a "Semi Shine";

ANDRE WILLIAMS,

a/k/a "Dre Savage";

RASHEED POLLARD;

CEMAL WOOD,

a/k/a "Mauly,"

a/k/a "Mauly from the hood"; and

DONTE SNOW.

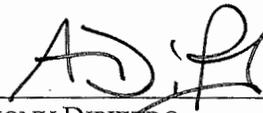
I, Anthony DiPietro, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about the dates set forth in Attachment A to this complaint, in the District of New Jersey and elsewhere:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



ANTHONY DIPIETRO
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE
SEPTEMBER 25, 2019
TRENTON, NEW JERSEY



HON. TONIANNE J. BONGIOVANNI
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One
(Conspiracy - Heroin)

From at least in or around July 2019 through in or around September 2019, in Burlington County, in the District of New Jersey and elsewhere, the defendants,

TALIB CONWAY, a/k/a "Dolla," a/k/a "Rock-a-Dolla,"
a/k/a "Rock," a/k/a "Dolla Shine," a/k/a "DS";
MICHAEL LINARES, a/k/a "Milk," a/k/a "Big Blood";
JAWAN PAXTON, a/k/a "Semi" a/k/a "Semi Shine";
ANDRE WILLIAMS, a/k/a "Dre Savage";
RASHEED POLLARD; and
DONTE SNOW,

did knowingly and intentionally conspire with each other and others known and unknown to distribute and possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

Count Two
(Conspiracy - Cocaine)

From at least in or around July 2019 through in or around September 2019, in Burlington County, in the District of New Jersey and elsewhere, the defendants,

TALIB CONWAY, a/k/a "Dolla," a/k/a "Rock-a-Dolla,"
a/k/a "Rock," a/k/a "Dolla Shine," a/k/a "DS";
TERON HUGGINS, a/k/a "Goog";
JERROD EPPS, a/k/a "Ed Mu," a/k/a "Ed Muh,"
a/k/a "Ed Moo," a/k/a "Eddie Moo," a/k/a "Chaz Epps";
MICHAEL LINARES, a/k/a "Milk," a/k/a "Big Blood";
JOAQUIN SIMERON, a/k/a "Joaq"; and
JAMARL SIMERON, a/k/a "Marl,"

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

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

Count Three
(Conspiracy – Crack Cocaine)

From at least in or around July 2019 through in or around September 2019, in Burlington County, in the District of New Jersey and elsewhere, the defendants,

TALIB CONWAY, a/k/a “Dolla,” a/k/a “Rock-a-Dolla,”
a/k/a “Rock,” a/k/a “Dolla Shine,” a/k/a “DS”;
MICHAEL LINARES, a/k/a “Milk,” a/k/a “Big Blood”;
JERROD EPPS, a/k/a “Ed Mu,” a/k/a “Ed Muh,”
a/k/a “Ed Moo,” a/k/a “Eddie Moo,” a/k/a “Chaz Epps”;
ANDRE WILLIAMS, a/k/a “Dre Savage”;
JOAQUIN SIMERON, a/k/a “Joaq”;
CEMAL WOOD, a/k/a “Maully,” a/k/a
“Maully from the hood”;
ALLAN SIMEON, a/k/a “Alione”;
RASHEED POLLARD; and
DONTE SNOW,

did knowingly and intentionally conspire with each other and others known and unknown 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.

ATTACHMENT B

I, Anthony Dipietro, am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2010. I have been involved personally in the investigation of this matter. The information contained in this complaint is based on my personal knowledge and on information obtained from other sources, including: (i) statements made or reported by various witnesses with knowledge of relevant facts; (ii) my review of documents and evidence obtained through court orders, subpoenas, and other sources; (iii) assistance provided to law enforcement by multiple confidential sources of information deemed credible and reliable; and (iv) my review of wire and electronic communications intercepted pursuant to court-authorized wiretaps. Because this complaint is submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the contents of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in sum and substance and in part, and the statements set forth herein are based on preliminary summaries and quotations of those communications.

I. BACKGROUND

1. From at least as early as in or around November 2018 to the present, the defendants, TALIB CONWAY, TERON HUGGINS, JERROD EPPS, MICHAEL LINARES, ALLAN SIMEON, JOAQUIN SIMERON, JAMARL SIMERON, RASHEEN POLLARD, JAWAN PAXTON, ANDRE WILLIAMS, DANTE SNOW, and CEMAL WOOD conspired to distribute and possess with intent to distribute, controlled substances, including at least 100 grams of heroin, at least 28 grams of crack cocaine, and quantities of cocaine, in and around Burlington County, New Jersey and beyond.

2. Law enforcement’s investigation of the defendants included reviews of local police reports, interviews of witnesses and confidential sources, extensive analysis of historical telephone call detail records, analysis of data received from pen register and trap and trace devices, physical surveillance, consensually recorded meetings and telephone calls, controlled drug buys, and the execution of search warrants on residences, vehicles, and cellular telephones. That evidence has confirmed that CONWAY and his co-conspirators managed the large-scale distribution of heroin, cocaine, crack cocaine, and other controlled substances as well as the collection of proceeds from the sale of these narcotics. In carrying out these unlawful activities, the defendants used traditional calls and text messaging, as well as social media platforms and applications, in an effort to thwart electronic surveillance by law enforcement. CONWAY used multiple, often changing, co-conspirators as couriers who delivered drugs packaged for resale to distributors and dealers.

3. Multiple confidential sources assisted law enforcement during this investigation, including by conducting controlled purchases of cocaine and crack-cocaine from CONWAY and others acting on his behalf. The information and assistance provided during the investigation by the confidential sources has been corroborated through other evidence law enforcement has obtained, including court-authorized wiretaps, physical surveillance, and consensually recorded calls and meetings.

4. In furtherance of the drug-trafficking activities, the co-conspirators agreed to obtain – and did obtain – significant quantities of cocaine, crack cocaine, and other controlled substances.

Also in furtherance of the drug-trafficking activities, the co-conspirators agreed to distribute – and did distribute – those narcotics, for profit, to other co-conspirators, various dealers, sub-dealers and end users in or around Burlington County and elsewhere.

II. MEMBERS OF THE CONSPIRACY

5. At all times relevant to the complaint:

(a) **TALIB CONWAY**, a/k/a “Dolla,” a/k/a “Rock-a-Dolla,” a/k/a “Rock,” a/k/a “Dolla shine,” a/k/a “DS,” was a leading member of the drug-trafficking conspiracy who obtained significant quantities of cocaine from defendants Teron HUGGINS, Jerrod EPPS, and redistributed that cocaine, often converting portions of it into crack cocaine, for profit, to other members of the conspiracy, various dealers, sub-dealers, and end users. Additionally, CONWAY obtained heroin from defendant Michael LINARES and further distributed that heroin to sub-dealers and end-users. CONWAY used a telephone facility ending in 9691 (the “CONWAY 9691 Facility”)¹ to communicate in furtherance of the conspiracy.

(b) **TERON HUGGINS**, a/k/a “Goog,” was a principal member of the drug trafficking conspiracy who supplied narcotics to CONWAY for further distribution. Unless noted otherwise, HUGGINS used telephone facility ending in 5775 (the “HUGGINS 5775 Facility”) to communicate in furtherance of the conspiracy.

(c) **JERROD EPPS**, a/k/a “Ed Mu,” a/k/a “Ed Muh,” a/k/a “Ed Moo,” a/k/a “Eddie Moo,” a/k/a “Chaz Epps,” was a principal member of the drug-trafficking conspiracy who worked in tandem with CONWAY to provide narcotics to sub-dealers and end users. Unless noted otherwise, EPPS used telephone facility ending in 7542 to communicate in furtherance of the conspiracy.

(d) **MICHAEL LINARES**, a/k/a “Milk,” a/k/a “Big Blood,” was a principal member of the drug trafficking conspiracy who provided heroin to CONWAY for further distribution. LINARES used telephone facilities ending in 8696 and 2117 (the “LINARES 8696 Facility” and the “LINARES 2117 Facility,” respectively) to communicate in furtherance of the conspiracy.

(e) **ALLAN SIMEON**, a/k/a “Alione,” was a member of the drug-trafficking conspiracy. Unless noted otherwise, SIMEON used telephone facility ending in 5914 to communicate in furtherance of the conspiracy.

(f) **JOAQUIN SIMERON**, a/k/a “Joaq,” was a member of the drug trafficking conspiracy who purchased cocaine, crack cocaine and other narcotics from CONWAY for further distribution. Unless noted otherwise, SIMERON used telephone facility ending in 3183 to communicate in furtherance of the conspiracy.

¹ All facilities are referred to by the last four digits of the telephone numbers.

(g) **JAMARL SIMERON**, a/k/a “Marl,” was a member of the drug trafficking conspiracy. SIMERON purchased cocaine and other controlled substances from CONWAY for further distribution and also sold narcotics to CONWAY for further distribution. Unless noted otherwise, SIMERON used telephone facility ending in 3191 to communicate in furtherance of the conspiracy.

(h) **JAWAN PAXTON**, a/k/a “Semi” a/k/a “Semi Shine,” was a member of the drug trafficking conspiracy. Unless noted otherwise, PAXTON used telephone facility ending in 3323 to communicate in furtherance of the conspiracy.

(i) **ANDRE WILLIAMS**, a/k/a “Dre Savage,” was a member of the drug trafficking conspiracy. WILLIAMS sold heroin and crack cocaine in furtherance of the conspiracy. WILLIAMS also provided and coordinated transportation to CONWAY for narcotics related activities. Unless noted otherwise, WILLIAMS used telephone facility ending in 8090 to communicate in furtherance of the conspiracy.

(j) **RASHEED POLLARD** was a member of the drug trafficking conspiracy who purchased narcotics for re-distribution. Unless noted otherwise, POLLARD used telephone facility ending in 6239 to communicate in furtherance of the conspiracy.

(k) **DONTE SNOW** was a member of the drug trafficking conspiracy. Unless noted otherwise, SNOW used telephone facility ending in 2184 to communicate in furtherance of the conspiracy.

(l) **CEMAL WOOD** a/k/a “Mauly” a/k/a “Mauly from the hood,” was a member of the drug trafficking conspiracy. Unless noted otherwise, WOOD used a telephone facility ending in 1759 to communicate in furtherance of the conspiracy.

III. WIRETAPS

6. From in or around July 2019 to in or around September 2019, law enforcement, acting pursuant to wiretap orders entered by the United States District Court for the District of New Jersey, intercepted wire and electronic communications over the following cellular telephone facilities, which CONWAY and other co-conspirators used in furtherance of the conspiracy:

(a) From in or around July 2019 to in or around September 2019, law enforcement intercepted telephone calls and text messages over the CONWAY 9691 Facility.

(b) From in or around August 2019 to in or around September 2019, law enforcement intercepted telephone calls and text messages over the EPPS 7542 Facility.

7. The telephone calls and text messages intercepted over these telephone facilities further revealed the scope and details of the conspiracy’s unlawful drug trafficking activities, including the identities of several of its narcotics suppliers and other co-conspirators. Summarized

below are some of the communications that law enforcement intercepted by, between, and among the co-conspirators and others in furtherance of the conspiracy.²

IV. PROBABLE CAUSE

8. CONWAY AND HUGGINS

(a) During the investigation, law enforcement intercepted numerous communications between CONWAY and HUGGINS in which they discussed the distribution of cocaine in furtherance of the conspiracy. Throughout the conspiracy, HUGGINS has supplied CONWAY with more than 60 grams of cocaine. Examples of these communications with CONWAY and HUGGINS are summarized in the paragraphs below.

(b) On July 16, 2019, at approximately 7:13 p.m., CONWAY called HUGGINS and informed him, "I need to see you...I ain't talking about tomorrow. I need like ASAP. Now, like big bro." HUGGINS responded, "Yea, we in the building. Look, look, look. We have (unintelligible) though. (unintelligible) Trey, trey, man. I gotta make a dollar or two, man." CONWAY said, "Can I get the fourth street one time? Can I get the fourth street one time?" HUGGINS responded, "I can't. No. You can't." CONWAY then said, "What, thirty four fifty? Thirty four fifty?" HUGGINS responded, "Come on, bro. God damn. It's a nickel. Its fifty cents more. What the fuck! There you go. Paying bills. Yo stop what you doing, bills." CONWAY conceded and said, "Let me get thirty real quick...like, I need it now...I need one solid piece, man." HUGGINS stated, "I ain't gonna front, it's all sand. The whole thing is sand, though...I swear to God, it's the shit though."

(c) Based on the context and the investigation, I believe that CONWAY contacted HUGGINS to order 30 grams of cocaine and needed it quickly ("I ain't talking about tomorrow. I need like ASAP."). HUGGINS informed him that he had the 30 grams of cocaine ("we in the building") but needed to make a profit ("I gotta make a dollar or two, man."). CONWAY asked if he could get a discount, thirty-four fifty (\$34.50) a gram. HUGGINS got upset because the price was thirty-five dollars a gram and CONWAY asked for a "fifty cents" discount. Further, I believe that CONWAY agreed on the price and again stated that he needed "thirty real quick" and wanted "one solid piece" (the consistency of crack cocaine). HUGGINS informed him that he only has "sand" (the consistency of powder cocaine) but that it was really good quality ("I swear to God, it's the shit though").

(d) On August 5, 2019, at approximately 7:49 p.m., HUGGINS called CONWAY. During this conversation, CONWAY said, "I need thirty of them" and, after arguing over a meet location, HUGGINS said, "I'm at the crib. I'm waiting on two niggas out here, niggas come my way, know what I mean? I'm waiting for them. Before I can leave. I gotta wait know

² Unless noted otherwise, all communications described in this complaint involving CONWAY, HUGGINS, EPPS, SIMEON, JOAQUIN, JAMARL, PAXTON, WILLIAMS, POLLARD, SNOW, and WOOD occurred over the aforementioned cellular telephone facilities; and all communications involving LINARES occurred over LINARES 8696 Facility.

what I mean, wait for uh, Money and Call B, they on their way right now though. You said Trey-O?" CONWAY answered affirmatively.

(e) Based on the context and the investigation, I believe that CONWAY contacted HUGGINS to order another 30 grams of cocaine. HUGGINS agreed to meet CONWAY in Pemberton Township after he saw two individuals referred to as "Money" and "Call B." I also believe that HUGGINS ended the conversation confirming that CONWAY wanted thirty grams of cocaine ("You said, Trey-0?").

9. CONWAY AND EPPS

(a) The investigation has revealed evidence that EPPS held a position of superiority over CONWAY. While they often worked in tandem, and in coordination, oftentimes CONWAY sought out EPPS in order to fulfill a cocaine or crack cocaine transaction. Summarized in the below paragraphs are some of the communications intercepted by law enforcement.

(b) On July 5, 2019, at approximately 12:07 p.m., CONWAY called EPPS and said, "Yo. I got somebody that want a ten." EPPS said, "Where at?" CONWAY said, "Burlington." EPPS said, "I'm bout to get up now." Based upon this investigation, I believe that CONWAY had taken an order for a narcotics transaction ("somebody that want a ten"), but did not have either the transportation or the supply to complete the purchase. On multiple occasions throughout this investigation, CONWAY involved EPPS in his narcotics deals, where either EPPS drove him to the location or EPPS arrived with the supply of narcotics.

(c) On July 12, 2019, at approximately 12:13 a.m., EPPS called CONWAY. On this call, EPPS said, "Ain't got no ballies, man." CONWAY responded, "Word up. I got some. I ain't got a lot." EPPS said, "Oh you do?" CONWAY said, "Yeah." EPPS said, "Can I get an eighth?" CONWAY stated, "I'm saying. I told you. I got that shit from the dispensary. You ain't want me." EPPS said, "You got at least a dime or two for me?" CONWAY said, "I mean, I got a eighth for you." EPPS responded, "Oh alright. Say no more." Based upon this investigation, I believe that EPPS asked CONWAY for marijuana, and specifically CONWAY agreed to provide him with an eighth of an ounce ("I got a eighth for you"). Based upon my training and experience, I know that the term "ballies" is used to refer to marijuana.

(d) On July 31, 2019, at approximately 1:04 p.m., EPPS called CONWAY and said, "Get rid of your jerk, bro." CONWAY responded, "Why? What happened?" EPPS said, "You ain't see that shit on the news?" CONWAY said, "Oh. Hell yeah." EPPS said, "Word up. That shit from yesterday, bro." CONWAY said, "Yeah. Nah, nah, that shit some old shit. I don't be talking to them niggas. They don't got my number." EPPS said, "Oh, yeah. I know. I'm just putting you on bitch." Based upon this ongoing investigation, I am aware that on July 30, 2019, CONWAY traveled to the Newark, New Jersey area to gather with other potential co-conspirators. On this same day, law enforcement from the Drug Enforcement Administration arrested a number of suspected criminal street gang members in Newark. Accordingly, I believe that EPPS heard about the arrests in Newark and informed CONWAY, specifically telling him to get rid of his phone number ("Get rid of your jerk, bro."). Based upon my training and experience, I know that individuals involved in ongoing narcotics or violent activity often change phone numbers after co-

conspirators or others with whom they have had contact have been arrested, for fear that law enforcement will search the arrestee's cell phone and discover additional incriminating information. Here, I believe that EPPS was concerned that those individuals arrested in Newark may have had contact with CONWAY and that law enforcement could discover information about CONWAY.

(e) On August 5, 2019, at approximately 4:16 p.m., EPPS called CONWAY. On this call, CONWAY said, "You still got some more of the, motherfucking, what's its name?" EPPS said, "Fifteens?" CONWAY responded, "Yerkees." Epps said, "Nah." CONWAY said, "Oh, alright. Yeah, the nigga just hit my phone. I told him I don't fuck with them but I know you had some but I'll tell him you ain't got none." EPPS said, "Yeah. Hell yeah I ain't got no more. Those shits went like hot cakes." Based upon this investigation, as well as my training and experience, I believe that an unknown individual asked CONWAY for a certain type of illegal drugs ("yerkees"), but that EPPS had already sold his supply ("those shits went like hot cakes").

(f) On August 17, 2019, at approximately 12:14 p.m., CONWAY called EPPS and said, "Shit, man. Just got bagged and shit." EPPS said, "You said what?" CONWAY responded, "Yeah, I got bagged yesterday." EPPS said, "Oh yeah? For what?" CONWAY said, "For coke." EPPS said, "Yeah? Where the fuck was you at?" CONWAY responded, "In the car. Bullshit, like. FaceTime me, you feel me?" Based upon this investigation, as well as independent information, I know that CONWAY was arrested in the early morning hours of August 17, 2019 for possession of cocaine following a motor vehicle stop. In this call, CONWAY told EPPS about his arrest ("Got bagged"). Further, CONWAY instructed EPPS to use a messaging application to contact him, believing that those communications would be more difficult to intercept. Based on my training, experience and information learned throughout this investigation, CONWAY uses this messaging application in furtherance of the conspiracy and in an effort to avoid law enforcement detection.

(g) On August 30, 2019, at approximately 12:47 p.m., EPPS received a call from a telephone number ending in 3577, wherein EPPS had a conversation with an unidentified male referred to as "Bump." In this conversation, Bump stated "Yo, I need ten of them" and EPPS said, "hey Bump, I'm still in the barbershop, I'm waiting to get my haircut..." Based on information learned throughout this investigation, it is believed that "Bump" ordered a quantity of narcotics from EPPS ("Yo, I need ten of them") and Epps informed him that it may take some time before he could meet up with him ("I'm still in the barbershop, I'm waiting to get my haircut...").

(h) On September 5, 2019, at approximately 5:13 p.m., EPPS called his mother. On this call, after a discussion of financial woes and parental responsibilities, EPPS stated that he did not want to end up in federal prison. EPPS further stated that he was about to "fall back" again because his new address was known by law enforcement. It is believed that the term "fall back" was a in reference to no longer being involved in narcotics related activities.

(i) On September 7, 2019, at approximately 5:20 p.m., EPPS received an incoming text from a telephone number ending in 4759. The unidentified person stated, "I wanted a dub, if u...u know." A minute later, EPPS responded, "Aight got u." Based upon the ongoing investigation and as noted above, law enforcement believes that the individual in this text was a

potential customer for crack cocaine. It is believed that the term “dub” was in reference to twenty dollars worth of narcotics (“I wanted a dub, if u...u know”). It is also believed that EPPS confirmed that he would be able to provide the crack-cocaine to the unidentified person (“[a]ight got u”).

10. CONWAY AND LINARES

(a) During the investigation, law enforcement intercepted numerous communications between CONWAY and LINARES in which they discussed the distribution of heroin in furtherance of the conspiracy. During the conspiracy, LINARES used at least two telephone facilities to communicate in furtherance of the conspiracy—the Linares 8696 Facility and Linares 2117 Facility. Examples of these communications with CONWAY are summarized in the below.

(b) On July 6, 2019, at approximately 8:55 p.m., LINARES called CONWAY and said, “How much you going to charge for an eighth of weed?” CONWAY responded, “40.” Based upon this investigation, I believe that CONWAY distributed several different illegal substances, including marijuana. On this call, LINARES and CONWAY discussed the price of an amount (“eighth”) of marijuana (“weed,” “40”).

(c) On July 8, 2019, LINARES called CONWAY to discuss a recent incident with EPPS. CONWAY said, “I’m just saying, I’m happy for my brother but why the fuck is you posting my shit like I’m some busta or some fuck nigga over \$800.” CONWAY continued, “How the fuck I turn you on to my man, get you a whole joint for \$4,000 flat and you couldn’t even give me ten grams out of a fucking key? Come on, my nigga.” CONWAY said, “Ten fucking grams nigga, ten grams? You wanna hold my chain and my strap for 800? You want to take me to a jewelry store to see if mine is real? Fuck.” It is believed, based upon this conversation and other intercepted communications, that LINARES and CONWAY were having a conversation about JERROD EPPS, and CONWAY was venting his frustrations about EPPS’s recent actions regarding heroin distribution. It is believed that both “a key” and “a whole joint” is slang for a kilogram of heroin. This conversation demonstrates that CONWAY was connected to another individual who could provide heroin in kilogram amounts (“I turn you on to my guy”), and that EPPS obtained a kilogram of heroin from CONWAY’s supplier (“get you a whole joint), but that EPPS would not provide CONWAY with ten grams of that kilogram of heroin (you couldn’t even give me ten grams out of a fucking key?”). Further, this conversation involved the discussion of firearms; where “my strap” is slang for a firearm.

(d) On July 9, 2019, at approximately 4:23 P.M., LINARES called CONWAY to discuss another narcotics associate, “Bullet.” CONWAY said, “My man Bullet called me. I said, listen, I’m a drop this shit on you bro, you give this shit out. You like it. You do business with me. And I already know because Oink already told me he does thirty at a time. So I need him.” It is believed that CONWAY informed LINARES of another individual that he wanted to work with in order to distribute narcotics (“I’m a drop this shit on you bro, you give this shit out”) and that CONWAY knew this other individual to distribute in high quantities (“he does thirty at a time”). Later in the conversation, CONWAY told LINARES about another individual who was

distributing for him, "Alione³." CONWAY said, "I just seen Alione sell forty-five grams, my nigga. For the last two days I was going over there. Fifty a gram. He sold all my shit." It is believed that CONWAY informed LINARES of another associate, "Alione," who distributes his supply of narcotics. ("forty-five grams," "Fifty a gram," "He sold all my shit.").

(e) On or about July 10, 2019, at approximately 11:30 p.m., LINARES called CONWAY and said, "Yo. Don't go to that [motel]. Don't go to that [Motel]. I just got up out of there. They on foot." CONWAY said, "Bitch, I don't go there. Who's you talking about?" LINARES said, "Oh, aight. Nah, cause I just text you my other number, like, go to the, uh, [Motel]." Based upon this investigation, I believe that LINARES was telling CONWAY to stay away from a motel ("Don't go to that [Motel]") because police were present ("They on foot."). This investigation has revealed that CONWAY and LINARES often distribute narcotics from a motel in Wrightstown, New Jersey. Further, LINARES confirmed that he had previously texted CONWAY to go to the motel, but followed up with a phone call to tell him not to go, because of the police.

(f) On July 15, 2019, at approximately 12:43 p.m., CONWAY called LINARES. In this call, LINARES said, "I just made a power move." CONWAY asked, "Power move?" LINARES said, "Yes." CONWAY responded, "Who, the light skin nigga?" LINARES said, "Yes, yes, yes. He finally reach out. So now I'm just waiting to see what he says. But he said he only do ten at a time, but that's still good. But I know he ain't going to send me his real number yet. You feel me?" Based upon my training and experience, as well as the entirety of this investigation, I believe that CONWAY and LINARES were talking about another distributor that they were attempting to recruit to work with them ("the light skin nigga" "he finally reached out"). In other intercepted communications, CONWAY and LINARES have discussed other individuals who they have used to assist in selling illegal drugs, in order to sell the drugs at a faster rate. Here, LINARES said that the individual they were discussing would only distribute ten grams at a time ("he only do ten at a time"). Based upon my training and experience, I know that higher-level drug dealers prefer to have other individuals actually sell the illegal drugs on the street. This arrangement allows for the higher-level distributor to insulate himself from law enforcement detection. Further, it is unsurprising that the street level dealer discussed in this call would only want to sell ten grams at a time. This is because street level dealers do not want to have high amounts of drugs in their personal possession at any one time, in case they are, in fact, detected by law enforcement.

(g) On July 18, 2019, at approximately 3:36 p.m., CONWAY called LINARES and said, "You want me to put old boy up in there? Yeah, cause, we ain't doing nothing. We just getting the room bitch. Like, if we gon get right, let's just get right. Fuck it." LINARES responded, "Yeah, nah." CONWAY said, "You said nah?" LINARES clarified, "I said go ahead." CONWAY said, "I'm a start him off light. Something light, like a breezy and two G's." Based upon this investigation and other intercepted communications, I believe that CONWAY and LINARES agreed to let another individual ("old boy") sell their narcotics, but that he would only be given a little at a time ("Something light, like a breezy and two G's"). Later in the conversation, CONWAY said, "I just came from taking a shower and all that. I'm bout to pull back up in the

³ Based upon the investigation and discussions with local law enforcement, "Alione" has been identified as a nickname for Allan SIMEON.

hood now. Bout to empty out the rest of this bag, bitch. You feel me?" LINARES said, "What, you got shelter out there?" CONWAY responded, "Yeah, you know it bro." LINARES said, "You said, oh, what, the back block?" CONWAY said, "The back block...like a couple cribs." Based upon other intercepted communications, I believe that CONWAY confirmed that he would be selling ("empty out the rest of this bag") in a particular neighborhood in Pemberton, New Jersey ("pull back up in the hood"). Further, CONWAY confirmed that he would be conducting narcotics transactions from residences located in the back of the neighborhood ("the back block").

(h) On July 18, 2019, at approximately 8:31 p.m., LINARES called CONWAY to discuss the location of a stash of drugs. LINARES said, "It's in, the um, freezer, in the freezer, in the trash bag." CONWAY told LINARES that he had a lot of business today, and specifically stated, "Motherfucking, um, yeah, bro, shit booming. We on one." CONWAY later told LINARES that the weight of the heroin that they had stashed was "27.8" grams, and then told LINARES, "I'm a take 12 and leave you 15." It is believed that CONWAY was going to take 12 grams of heroin to sell, and leave 15 grams of heroin in the freezer at the stash location. Based upon the ongoing investigation and other intercepted communications, it is believed that the stash location at the time of this call was inside a rented room at a motel in Bordentown, New Jersey. After additional discussion about the weights of various narcotics, CONWAY asked, "Where the bags at?" and LINARES answered, "It should be right there by the scale." It is believed that CONWAY intended to package the heroin for sale in bags, and that LINARES told him the bags were located next to a scale, commonly used to weigh heroin prior to packaging.

(i) On July 21, 2019, at approximately 2:37 p.m., CONWAY called LINARES and said, "I have a couple traps to make." Based upon the investigation, and my training and experience, I believe that CONWAY was telling LINARES that he had a couple drug transactions lined up ("a couple traps to make").

(j) On or about July 22, 2019, at approximately 6:23 p.m., CONWAY called LINARES and said, "Talk to him yet?" LINARES responded, "Man, he just text me back. He said that, uh, the trap I sent he got. I just text him like, 'Dolla said he sent something too'." CONWAY said, "Yeah, she at the Wawa right now. I text him. She said she wasn't going in there." Based upon the investigation, I believe CONWAY and LINARES were talking about narcotics transactions ("the trap I sent" "Dolla said he sent something too") that they each set up with another person. I know that "Dolla" is a nickname of CONWAY. CONWAY confirmed that he texted this other individual about the transaction ("I text him").

(k) On August 1, 2019, at approximately 10:46 p.m., CONWAY called LINARES and said, "How long it take you to take me a ten piece to the hood?" LINARES responded, "Um, shit. Probably from, I'm at Quick Check. So I'm going to Flo in Burlington. Then from Burlington, to there. So probably, like, what, probably like thirty." CONWAY said, "Alright, I see you in the hood." It is believed that CONWAY asked LINARES to bring him a quantity of narcotics ("a 10 piece") and LINARES agreed to bring the narcotics to him in a neighborhood in Pemberton Township ("the hood").

(l) On August 3, 2019, at approximately 10:37 a.m., CONWAY received a text from LINARES. In this text, LINARES said, "Fire for u save 10 for u." Based upon the

investigation, it is believed that LINARES informed CONWAY that he had a quantity of narcotics ready for him to pick up (“Fire for u save 10 for u”).

(m) On August 6, 2019, at approximately 1:56 a.m., CONWAY called LINARES and stated, “Yo, they ain’t had nothing” and LINARES replied “The door open but you know the door open at Ford’s house, too. I know that shit fucked.” It is believed that LINARES directed CONWAY to a stash house that did not have the narcotics quantity that CONWAY was seeking (“Yo, they ain’t had nothing.”).

(n) On August 13, 2019, at approximately 9:32 p.m., CONWAY called the LINARES 2117 Facility. On this call, LINARES said, “I need some. You got bally?” CONWAY responded, “All I got is the jars, bro. I ain’t gonna lie.” LINARES said, “What, the zookies and all that?” CONWAY responded, “Yeah. I bought two of them. That’s all I got. Nah what I mean?” LINARES said, “I need one of those shits bro.” CONWAY then agreed to go to LINARES’s location. Based upon this conversation, I believe that LINARES inquired as to what narcotics CONWAY had (“You got bally?” “zookies”). Based upon my training and experience, I believe that “bally” is a reference to marijuana and “zookies” is a reference to prescription pills.

(o) On August 14, 2019, at approximately 9:24 p.m., CONWAY called LINARES and said, “Mans just gave me something to give to you and told me to get back with him if you like it. He gave me ten for you. Raw.” LINARES said, “Solid?” CONWAY responded, “Yeah, a solid piece. No shade, my nigga.” CONWAY then said, “thirty-five my nigga.” On this call, CONWAY and LINARES continued to discuss that LINARES was currently on his way to pick up narcotics from another source, but would come back to CONWAY later. LINARES said, “Imma just grab half over there, then Imma come back and grab half from that way. You heard?” Based upon the entirety of this interception and the investigation, I believe that CONWAY advertised a quantity of crack cocaine (“ten for you” “Raw” “Solid”).

(p) On or about August 20, 2019, at approximately 11:12 a.m., the LINARES 2117 Facility called CONWAY. On this call, LINARES said, “Alright. I ain’t doing shit. I got fire though on the other note. That shit bad and that supreme fell off (unintelligible) that got it now, batch. My turn now, ya heard?” CONWAY said, “I know.” LINARES said, “Back to the good ways, I promise.” Based upon this investigation, I believe that LINARES told CONWAY that he had narcotics (“fire”) and that he would be in a good position to sell from now on (“that supreme fell off” and “Back to the good ways, I promise.”).

(q) On September 6, 2019, at approximately 3:17 p.m., LINARES called CONWAY and stated, “Yo what up bro” and CONWAY replied, “Answer the Face Time audio.” LINARES asked, “Face Time audio?” CONWAY answered, “I just was calling you, I’m out to call you answer.” A minute later, CONWAY called LINARES, and they discussed a marijuana dispensary in Camden, New Jersey. Based upon the entirety of this interception and the investigation as a whole, I believe that CONWAY wanted to set up a narcotics transaction with LINARES and asked him to “answer the Face Time audio” in an effort to thwart electronic surveillance by law enforcement.

11. **ALLAN SIMEON**

(a) During the investigation, law enforcement intercepted numerous communications between MAYS and SIMEON in which they discussed firearms and the distribution of crack cocaine in furtherance of the conspiracy. Four examples of SIMEON's communications with CONWAY are summarized in the paragraphs below.

(b) On or about July 24, 2019, at approximately 10:34 p.m., SIMEON called CONWAY and said, "Hey yo. Where my gun at?" CONWAY responded, "Why the fuck would you call my phone saying that?" SIMEON responded, "Because I need my shit. I need my shit bro, you heard?" CONWAY responded, "Go get it." Based upon this investigation, I believe that CONWAY frequently either carries or has access to firearms, and in this instance, may have been in possession of a firearm belonging to SIMEON.

(c) On or about July 27, 2019, at approximately 2:58 p.m., CONWAY called SIMEON and said, "Hey, yo. I'm about to pull up there. You could hold these like seven joints for me there?" SIMEON said, "Seven what?" CONWAY responded, "Hard." Based upon this investigation, I believe that CONWAY asked SIMEON to hold seven grams of crack cocaine ("hard") for him. Further, based on this investigation, it is known that SIMEON's residence is often used to store narcotics.

(d) On or about July 29, 2019, at approximately 11:48 p.m., SIMEON called CONWAY and said, "When are you going to being that ratchet, son?" CONWAY responded, "Huh?" SIMEON said, "Bring me that little, that little, the ratchet." CONWAY responded, "Bro, you got to come get it, bro. I don't have no car, bro." Based upon this investigation, and my training and experience, I believe that SIMEON was asking CONWAY to bring him a firearm ("the ratchet."). CONWAY confirmed that he had the firearm, but that SIMEON would have to come pick it up.

(e) On August 9, 2019, at approximately 2:13 p.m., CONWAY called SIMEON and said, "They raiding, they raiding Ski's shit right now." SIMEON said, "Ah damn." CONWAY said, "You good, right?" and SIMEON responded, "Yeah, I'm good. I'm out of there. They ain't at my shit, they ain't at my shit, cause I got some shit in there too. I ain't home." Based upon this investigation, it is believed that CONWAY informed SIMEON that police were searching a certain location ("they raiding ski's shit right now."). Through this call, CONWAY appeared to give SIMEON the information to make sure that he also was not at risk of police going to his house ("you good?" "I'm out of there, they ain't at my shit.").

12. **JOAQUIN SIMERON**

(a) During the investigation, law enforcement intercepted numerous communications between JOAQUIN and CONWAY in which they discussed the distribution of cocaine and crack cocaine. Throughout the investigation, law enforcement observed JOAQUIN driving CONWAY to conduct narcotics related activities. Indeed, law enforcement observed JOAQUIN along with CONWAY during a law enforcement controlled purchase of twenty-eight grams of crack cocaine. JOAQUIN has also served as a courier and broker for CONWAY on

multiple occasions. Examples of JOAQUIN's communications with CONWAY are summarized in the paragraphs below.

(b) On July 3, 2019, at approximately 11:51 a.m., JOAQUIN called CONWAY and asked, "You got something to post up with?" CONWAY responded, "Nah, I told ya, we posted up with the fifteens." JOAQUIN responded, "They got any more of that shit left?" and CONWAY said, "Yea, like forty." JOAQUIN said, "Let me know when you headed back out there." Based upon this investigation, and prior intercepted calls, I believe that mention of "fifteens" is a reference to fifteen milligram Percocet pills, and that JOAQUIN expressed his interest in obtaining them for distribution ("You got something to post up with?").

(c) On July 16, 2019, at approximately 11:21 p.m., CONWAY called JOAQUIN and said, "You still got that seven soft?" JOAQUIN said, "Yeah." CONWAY responded, "I'm saying, look, you all want to do six and one and give it to old boy at your Grandmother's house and shit? Because I was supposed to pull up on him with seven but I fucking forgot and Maul just sent somebody to see me to grab some bread for him and I said I have it to him. But I forgot and I'm all the way out here." JOAQUIN said, "So what you want to do?" CONWAY said, "He wanted seven. You know. Your people's people." It is believed that on this call, CONWAY was asking JOAQUIN to deliver seven grams of cocaine ("seven soft") and 6 grams of crack ("six and one") to a person close to both of them ("your people's people"). Additionally, based upon this investigation, it is believed that "Maul" is a nickname used to refer to JAMARL SIMERON, brother of JOAQUIN.

(d) On September 18, 2019, at approximately 8:05 p.m., CONWAY called JOAQUIN and asked, "Y'all started yet?" JOAQUIN said, "Yeah, we started nigga, niggas ready to cash in their bands, you playing, nigga" and CONWAY asked, "How many you got?" JOAQUIN responded, "Nigga said you playing around." CONWAY immediately said, "Man, answer the Face Time." Based on the context of this communication, I believe that CONWAY wanted to discuss narcotics activities, which prompted him to tell JOAQUIN to "answer the Face Time" in order to avoid law enforcement interception.

13. JAMARL SIMERON

(a) During the investigation, law enforcement intercepted numerous communications between CONWAY and JAMARL SIMERON in which they discussed the distribution of cocaine and crack cocaine in furtherance of the conspiracy. Examples of JAMARL's communications with CONWAY are summarized in the below paragraphs.

(b) On July 5, 2019, at approximately 3:41 p.m., JAMARL called CONWAY and stated, "Trying to get the rest of this bread soon as get off these grams of dope." CONWAY said, "Say again?" JAMARL responded, "I said, soon as I get off this doggie and some of these yam, I hit you with bread." Based upon this investigation, I believe that JAMARL was informing CONWAY that he was trying to sell heroin ("dope," "doggie," "yam") and that he would be giving CONWAY the money after he made the sales ("hit you with bread"). Based upon this and other conversations, I believe that CONWAY occasionally provided narcotics to JAMARL to distribute to others.

(c) On July 17, 2019, at approximately 5:37 p.m., JAMARL called CONWAY and stated, "I said where niggas are post up at?" CONWAY responded, "Nigga, I be in the hood. I got a nigga in the motel pumping for me. I rented a room. I got a nigga in there. I be in the hood posted up my nigga. Shalonda house, BG house, selling hella weed, hella percs, nigga. Niggas come to get raw, everything from me nigga. I'm out there. I'm out there, I'm talking about bitch, shit, I picked up thirty from GB yesterday. That shit gone. You feel me? That shit gone bro. Like you feel me?" Later in this conversation, JAMARL stated, "so I got a lil 8th Street. I'm waiting for Wacka to bring back. I can do something with that right? Turn that into a nine right quick?" CONWAY asked, "8th street of what?" JAMARL answered, "eight joints" and CONWAY clarified, "eight grams?" JAMARL answered affirmatively and asked CONWAY, "I don't know. I can turn it into something or I gotta leave it like that right? CONWAY responded, I aint gone lie Geez, I cooked up straight oil, but yu don't gonna turn it into nothing nigga. You can it into something nigga, you can turn that into like motherfucking ten, twelve nigga and I'm a sell that shit nigga. Forty a gram ASAP."

(d) Based upon this investigation, I believe that CONWAY informed JAMARL that he had been selling a variety of illegal drugs, including marijuana ("weed"), prescription pills ("percs"), and heroin ("raw"). CONWAY informed that he was selling in the "hood." Based upon this investigation and information from local law enforcement officers, I know that the "hood" is a reference to a particular neighborhood in Pemberton, New Jersey. Further, CONWAY confirmed that he had other individuals selling drugs for him at a motel ("I got a nigga in the motel pumping for me"). Lastly, I believe CONWAY was instructing JAMARL how to maximize profit on an "8th Street" which is a reference to eight grams of cocaine. According to CONWAY, in order to maximize profit, he "cooked up straight oil (cocaine)...[and] turn that into like motherfucking ten, twelve, nigga and...sell that shit nigga [for forty dollars] a gram ASAP."

(e) On July 19, 2019, at approximately 7:11 p.m., JAMARL called CONWAY and asked, "You got some work?" CONWAY responded, "Hell yeah." JAMARL said, "I got a lil dime." CONWAY said, "What you want for it? I be selling my shit for 40." JAMARL said, "You know how I can get rid of mine?" CONWAY said, "Of course. Come through the "hood right now, nigga. It's poppin." It is believed that JAMARL and CONWAY were discussing the sale of illegal drugs, where JAMARL was asking CONWAY for help selling his remaining supply. ("I got a lil dime," "You know how I can get rid of mine?"). CONWAY also informed JAMARL that his typical sale price for these drugs was \$40 ("40"). Further, based upon this investigation, I believe that CONWAY was directing JAMARL into CONWAY's neighborhood for purposes of selling his supply of drugs. ("Come through the hood").

(f) On August 2, 2019, at approximately 2:45 p.m., JAMARL called CONWAY and stated, "Alright, I'm not coming out there, right. The fuckin police out there" and CONWAY said, "Nah, you good though." JAMARL disagreed and again stated, "Nah, I'm not going out there. Police out there, bro." Based on this investigation, it's believed that JAMARL was not willing to conduct any narcotics transactions during the time that law enforcement was in the vicinity ("nah, I'm not going out there police out there bro") despite CONWAY's reassurance ("nah, you good though").

14. **JAWAN PAXTON**

(a) During the investigation, law enforcement intercepted numerous communications between CONWAY and PAXTON in which they discussed the distribution of heroin in furtherance of the conspiracy. Based on the context of these communications and others, I believe that CONWAY has provided at least six bricks⁴ of heroin on consignment to PAXTON, arranging to receive payment at a later date. Examples of PAXTON's communications with CONWAY are summarized in the paragraphs below.

(b) On July 3, 2019, at approximately 10:35 p.m., CONWAY called PAXTON and said, "When I left, people wanted to get a strap from me or shit like that, you feel me?" CONWAY later said, "I'm about to bust somebody out there." CONWAY also remarked, "There's hella police out here." Based upon my training and experience, as well as this investigation, I believe that CONWAY was discussing guns ("strap") and that he may have to commit an act of violence. ("bust someone out there").

(c) On July 5, 2019, at approximately 1:00 p.m., CONWAY called PAXTON and stated, "You made me come out here for nothing." PAXTON responded, "You not even out here bro stop lying." CONWAY said, "On the set nigga, I'm turning off of \$130 motha fucka" and PAXTON replied, "Bro stop lying bro." CONWAY stated, "Bro Face Time me then you'll see." Based upon this investigation and the context of this call, I believe that CONWAY was complaining that PAXTON made him "come out...for nothing" and that he was waiting to conduct a narcotics transaction with PAXTON ("on the set nigga"). Meanwhile, CONWAY rejected a \$130 offer for a quantity of heroin (I'm turning off of \$130 motha fucka") because he was holding it for PAXTON. When PAXTON did not believe him ("stop lying bro"), CONWAY told PAXTON to "Face Time" him.

15. **ANDRE WILLIAMS**

(a) During the investigation, law enforcement intercepted communications between CONWAY and WILLIAMS in furtherance of the conspiracy. WILLIAMS is a known to store and distribute heroin and crack cocaine, often at CONWAY's behest. Examples of WILLIAMS's communications with CONWAY are summarized in the paragraphs below.

(b) On July 9, 2019, at approximately 8:29 p.m., CONWAY called WILLIAMS and stated, "Say, what's up with you ole bruh? Hey, yo I'm back in motion with everything, bro." WILLIAMS responded, "Yeah?" and CONWAY says, "Yeah, back in motion with everything. Fire." Based upon this investigation, it is believed that CONWAY was advertising to WILLIAMS that he was actively selling narcotics ("I'm back in motion with everything." "Fire."). It is known that narcotics are commonly referred to as "fire."

(c) On August 30, 2019, at approximately 11:24 a.m., an incoming call was received over Conway Phone 1 from telephone number 609-283-8090, wherein CONWAY had a conversation with Andre WILLIAMS. On this call, WILLIAMS asked, "A yo, you got seven?"

⁴ A brick of heroin is 50 glassine envelopes that are held together by a rubber band.

CONWAY responded, "Bro Face Time me bro c'mon." Based on what we have learned throughout this investigation and as a result of other intercepted communications, it is believed that WILLIAMS ordered a quantity of narcotics from CONWAY ("A yo, you got seven?"). Further, this was another example on CONWAY using communication applications to avoid law enforcement from intercepting wire/electronic communications ("Bro Face Time me bro c'mon").

(d) On September 4, 2019, at approximately 5:15 p.m., CONWAY called WILLIAMS. On this call, WILLIAMS stated "...what they saying about that ahh one jawn...the other shit" and CONWAY responded, "aint no one say anything was wrong with it, nigga, shit they buying it up." CONWAY further stated "...I'm gonna FaceTime you when I get out of here." It is believed that WILLIAMS asked if CONWAY had gotten any feedback from distributors and/or users on the quality of the recent batch of heroin. It is known that "jawn" is a term to refer to narcotics, specifically, in this call, heroin.

16. **RASHEED POLLARD**

(a) During the investigation, law enforcement intercepted communications between POLLARD and CONWAY. Based on the context of these communications and others, I believe that CONWAY has provided POLLARD at least eleven bricks of heroin and four grams of crack cocaine. Examples of POLLARD's communications with CONWAY are summarized in the below paragraphs.

(b) On July 11, 2019, at approximately 1:33 p.m., POLLARD called CONWAY and stated, "Let me get one real quick bro. I need it right now." CONWAY asked, "What?" And, POLLARD responded, "Nah, a D. I'm about to grab two grams in a little bit though. Just a D right now." CONWAY asked, "You want grams or a brick?" POLLARD answered, "A brick." Based on the context of these communications and the investigation, I believe that POLLARD was ordering a quantity of heroin from CONWAY ("let me get one real quick, a D"). It is known that a "D" is slang for a deck, which is a common quantity of heroin, typically ten individual bags rubber banded together. Further, narcotics are frequently ordered in quantities of "grams" and "bricks."

(c) On September 3, 2019, at approximately 9:59 p.m., POLLARD called CONWAY. On this call, CONWAY stated, "Where you at?" POLLARD answered, "I'm saying, I'm leaving the Mill's right now, I don't even need all of it, I just need two grams right now" and CONWAY said, "Alright, I'll ask Sav, he on K block." POLLARD stated, "80 right?" CONWAY responded affirmatively. Based on the context and the investigation, I believe that POLLARD was in a rush to leave a neighborhood in Pemberton Township that he referred to as "the Mills," and asked CONWAY to give him whatever quantity of narcotics he had readily available ("I don't even need all of it, I just need two grams right now."). CONWAY agreed to send "sav" (aka Andre WILLIAMS) and POLLARD confirmed the price for the two grams, "80 right?"

17. **DONTE SNOW**

(a) During the investigation, law enforcement intercepted communications between SNOW and CONWAY. SNOW frequently bought heroin and crack cocaine from CONWAY for further distribution. Based on the context of these communications and others, I believe that SNOW also served as a courier and assisted CONWAY packaging heroin for further distribution. Examples of SNOW's communications with CONWAY are summarized in the paragraphs below.

(b) On July 17, 2019 at approximately 10:20 p.m., Donte SNOW called CONWAY and said, "...let me get a gram, yo." CONWAY responded, "Alright, where you, that shit was fire wasn't it?" SNOW stated, "Ummhmm where you want me to meet you at?" and CONWAY responded "Yeah, I'm at the [Motel]." CONWAY then asked, "You said, gram a hard or d?" SNOW answered, "Uh, D, hard, hard, hard." A couple of minutes later, CONWAY called SNOW and asked, "You said you want two or one?" SNOW confirmed, "I want one." A couple of minutes later, SNOW asked, "You said the room?" and CONWAY answered, "Yeah the room, same room you came to today where blood at." Based on the context and the investigation, I believe that SNOW ordered one gram of suspected crack cocaine when he stated "hard, hard, hard." Further, SNOW asked which motel room CONWAY was in and CONWAY responded "same room you came to today where blood at" which likely was a reference to the same motel room where CONWAY's co-conspirators were staying.

(c) On July 27, 2019, at approximately 5:29 p.m., SNOW called CONWAY and stated, "I need a gram and a brick." CONWAY responded, "Alright, I'm on my way to the hood right now." Based on the context and the investigation, I believe that SNOW ordered one gram of suspected crack cocaine and one brick of heroin ("I need a gram and a brick.").

(d) On July 29, 2019, at approximately 1:07 p.m., CONWAY returned a previous unanswered call from SNOW. SNOW said, "Yo, I need a house from you Moo" and CONWAY responded affirmatively. At approximately 2:57 p.m., SNOW and CONWAY had a brief conversation about meeting up at "K Block" which is a street in a neighborhood in Pemberton Township. Based on the context and the investigation, I believe that SNOW ordered a brick (often referred to as a "house") of heroin.

(e) On July 31, 2019, at approximately 12:58 a.m., CONWAY called SNOW and informed him, "I need the strainer and the rubber bands bro." SNOW asked, "where you at, I'm about to hop in my whip right now, where you at?" and CONWAY responded, "I'm right here in front of Shalonda house bro, could you please hurry up cause I already started." SNOW answered affirmatively and CONWAY again stated, "Alright, bring the rubber bands and the strainer."

(f) On August 1, 2019, at approximately 5:04 p.m., SNOW called CONWAY. On this call, CONWAY informed SNOW, "Yea, I got that doggie bag for Stu," and SNOW responded affirmatively. CONWAY then asked, "You got some more rubber bands?" SNOW answered, "Uh, yea, at the crib though."

(g) Based on the context of conversations in (e), (f) in this paragraph and the investigation, I believe that SNOW often assisted CONWAY with packaging heroin for further distribution by using items such as “doggie bags,” “strainers,” and “rubber bands.” Based on my training and experience, I know that the term “doggie bag” is in reference to the glassine envelopes used to package heroin. Further, I know that a “strainer” is used to remove unwanted particles from heroin before its packaged in the glassine envelope. Lastly, as mentioned above, a brick of heroin is 50 glassine envelopes that are held together by a rubber band.

(h) On September 8, 2019, around 1:58 p.m., CONWAY called SNOW. On this call, SNOW asked, “Where you at?” CONWAY stated, “In the hood. I ran to the hood real quick” and SNOW stated, “Oh alright, because you know that shit is still in the glove compartment.” Based on the context and the investigation, I believe that SNOW informed CONWAY that the narcotics were left in the glove compartment of a vehicle. Throughout this investigation, law enforcement agents have observed co-conspirators often leave narcotics inside vehicles as a way to distance themselves from the contraband.

18. CEMAL WOOD

(a) During the investigation, law enforcement intercepted communications between WOOD and CONWAY. WOOD frequently bought heroin, crack cocaine and cocaine from CONWAY on consignment for further distribution. Indeed, in recent weeks, WOOD purchased approximately twenty-two grams of crack cocaine in furtherance of the conspiracy. Examples of WOOD’s communications with CONWAY are summarized below in the paragraphs below.

(b) On July 30, 2019, at approximately 6:07 p.m., WOOD called CONWAY. On this call, CONWAY asked, “Yeah, yeah, talk to me how many?” and WOOD responded, “Two.” CONWAY instructed, “Alright, go to my sister house.” CONWAY then said, “Alright, I’m a call her right now, tell her to get it ready for you my nigga, you want me to give you some more just in case I aint back in time or you good?” WOOD stated, “Uh, if you gonna throw me one” and CONWAY said, “Yeah, I’m a tell her give you five of them and you just owe me one-twenty.” WOOD responded affirmatively. At approximately 6:21 p.m., a female that law enforcement were not able to identity (“UF”) called CONWAY. On this call, CONWAY asked, “Can you make up five of them hard boys for Maulley?” UF responded, “Is everything in here?” CONWAY replied, “Yeah, it’s in your closet all the way to the back of your closet up top.” Based on the context and the investigation, I believe that WOOD ordered “two” grams of crack cocaine and CONWAY instructed him to “go to [his] sister’s house.” CONWAY offered WOOD “five” grams of crack cocaine and WOOD would owe him \$120. I further believe that CONWAY instructed the UF to “make up five of them hard boys for Maulley.” Based on the context and the investigation, I know that “hard boys” is a reference to crack cocaine. I also know that WOOD is also known as “Maulley.”

(c) On August 14, 2019, at approximately 10:02 p.m., WOOD called CONWAY and asked, “When you coming back?” CONWAY responded, “I be back in like 25 minutes” and WOOD said, “Yeah, I need like three of them shits.” CONWAY immediately said, “ho, ho, ho, chill, you ain’t gotta say that over the...alright.” Based on the context and the investigation, I

believe that WOOD ordered a quantity of narcotics and CONWAY immediately got spooked because WOOD spoke openly about the quantity of narcotics he wanted.

(d) On August 24, 2019, at approximately 7:09 p.m., WOOD called CONWAY and asked, "Yo, where you at?" CONWAY responded, "Uh, down the street on the bend, whatchu need?" WOOD answered, "I'm out here, I'm out front of the by (unintelligible), I need two of them jawns," and CONWAY asked, "Alright, you don't see Dre Savage (Andre WILLIAMS)?" WOOD responded, "He got the work?" CONWAY asked, "You don't see Dre Savage?" WOOD answered, "Yeah, he right here" and CONWAY said, "He got it." At approximately, 11:24 p.m., CONWAY called WILLIAMS and said, "He wants two hard." WILLIAMS confirmed, "He wants two hard." CONWAY said, "Good lookin. Good lookin. Two hard. Yeah, we good." Based on the context and the investigation, I believe that WOOD again ordered two grams of crack cocaine from CONWAY ("I need two of them jawns"). CONWAY instructed Andre WILLIAMS to supply WOOD with "two hard." As previously mentioned, I know "hard" is a reference to crack cocaine because of its texture/consistency.

19. Through the course of this investigation, law enforcement has seized cocaine from transactions conducted by confidential sources, monitored all intercepted communications regarding the amounts of cocaine, crack cocaine, and heroin being sold, and surveilled numerous transactions between co-conspirators which corresponded to intercepted communications. As a result, law enforcement has concluded that, in total, the members of the conspiracy distributed and possessed with intent to distribute at least 100 grams of heroin, at least 28 grams of crack cocaine, and quantities of cocaine.

V. CONCLUSION

20. Wherefore, I submit that there is probable cause to believe that the members of the conspiracy described above, from in or about July 2019 and continuing through in or about September 2019, in Burlington County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and to possess with intent to distribute 100 grams or more of a mixture and substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), in violation of Title 21, United States Code, Section 846; did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and to possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), in violation of Title 21, United States Code, Section 846; and did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and to possess with intent to distribute 28 grams or more of a mixture and substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), in violation of Title 21, United States Code, Section 846.

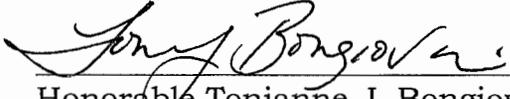
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 19-1564(DEA)
 :
 v. : Hon. Tonianne J. Bongiovanni
 :
 TALIB CONWAY, et. al. :
 : **SEALING ORDER**

This matter having been brought before the Court upon application of
Craig Carpenito, the United States Attorney for the District of New Jersey (Ray
Mateo, Assistant United States Attorney, appearing), for an order sealing the
Complaint and Arrest Warrant issued on this date, and for good cause shown,

IT IS on this 25th day of September, 2019,

ORDERED that the Complaint, Arrest Warrant, and all related
documents, except as necessary to effectuate the arrest of the defendant, be
and hereby are sealed until the arrest of any defendant or until further Order of
this Court.



Honorable Tonianne J. Bongiovanni
United States Magistrate Judge