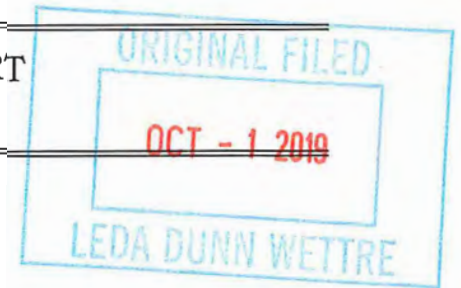


UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY



UNITED STATES OF AMERICA

Mag. No. 19-8291

v.

Hon. Leda Dunn Wettre

AARYN ABRAMS,
a/k/a "AI";
NAJIER BOONE,
a/k/a "Bebe";
CARL BROWN,
a/k/a "C Dub";
KEITH BRINKLEY,
a/k/a "K";
ZIKEME BROOKS,
a/k/a "Zeek",
a/k/a "Ace";
DAVINE CAMPBELL,
a/k/a "D";
SHAQUILLE FAVOR;
TAWAN GRIER,
a/k/a "TJ";
ISAIAH HARGROVE;
TYSON JACOBS;
AMIR JONES,
a/k/a "Wiz,"
DASHION KELSON,
a/k/a "Tank";
DWAYNE NORTHERN,
a/k/a "Black,"
a/k/a "D Black";
WYZIER PETERSON,
JIMIR RICKS,
a/k/a "40,"
a/k/a "Red";
MAURICE TISDALE; and
CEQUAN WHARTON;
a/k/a "Ce Ce";

I, Dallas Herrmann, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:

Special Agent Dallas Herrmann
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and subscribed in my presence,
October 1, 2019 in Newark, New Jersey

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One

(Conspiracy to Distribute Heroin)

From at least in or around September 2018 through on or about October 1, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

AARON ABRAMS,
a/k/a "AI";
NAJIER BOONE,
a/k/a "Bebe";
KEITH BRINKLEY,
a/k/a "K";
CARL BROWN,
a/k/a "C Dub";
SHAQUILLE FAVOR;
TAWAN GRIER,
a/k/a "TJ";
ISAIAH HARGROVE;
TYSON JACOBS;
AMIR JONES,
a/k/a "Wiz";
DASHION KELSON,
a/k/a "Tank";
WYZIER PETERSON;
JIMIR RICKS,
a/k/a "40,"
a/k/a "Red";
MAURICE TISDALE; and
CEQUAN WHARTON,
a/k/a "Ce Ce",

did knowingly and intentionally conspire and agree with each other and others 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 to Distribute Heroin)

From at least in or around September 2018 through on or about October 1, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

AARON ABRAMS,
a/k/a "AI";
NAJIER BOONE,
a/k/a "Bebe";
KEITH BRINKLEY,
a/k/a "K";
ZIKEME BROOKS,
a/k/a "Zeek,"
a/k/a "Ace";
CARL BROWN,
a/k/a "C Dub";
SHAQUILLE FAVOR;
TAWAN GRIER,
a/k/a "TJ";
ISAIAH HARGROVE;
TYSON JACOBS;
AMIR JONES,
a/k/a "Wiz";
DASHION KELSON,
a/k/a "Tank";
DWAYNE NORTHERN,
a/k/a "Black,"
a/k/a "D Black";
WYZIER PETERSON;
JIMIR RICKS,
a/k/a "40,"
a/k/a "Red";
MAURICE TISDALE; and
CEQUAN WHARTON,
a/k/a "Ce Ce",

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 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)(C).

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

Count Three

(Conspiracy to Distribute Fentanyl)

From at least in or around September 2018 through on or about October 1, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

SHAQUILLE FAVOR;
TAWAN GRIER,
a/k/a "TJ";
ISAIAH HARGROVE;
TYSON JACOBS;
DASHION KELSON,
a/k/a "Tank";
JIMIR RICKS,
a/k/a "40,"
a/k/a "Red"; and
WYZIER PETERSON,

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), 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 Four

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about September 5, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

NAJIER BOONE,
a/k/a "Bebe," and
DAVINE CAMPBELL,
a/k/a "D",

did knowingly and intentionally distribute, and possess with the intent to distribute, 28 grams or more 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, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

Count Five

(Distribution and Possession with Intent to Distribute Heroin)

On or about October 10, 2018, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

TAWAN GRIER,
a/k/a "TJ",

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

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

Count Six

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about November 7, 2018, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

TAWAN GRIER,
a/k/a "TJ",

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

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

ATTACHMENT B

I, Dallas Herrmann, have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") since 2015, and I have been involved personally in the investigation of this matter. The information contained within this complaint is based upon my personal knowledge and on information obtained from other sources, including but not limited to: (a) statements made or reported by witnesses with knowledge of relevant facts; (b) my review of documents and evidence obtained through court orders, subpoenas, and other sources; (c) assistance provided to law enforcement by multiple confidential sources of information; and (d) my review of audio and video recordings of controlled purchases of narcotics. 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 the contents of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Investigation

1. Since at least September 2018, law enforcement, including, but not limited to, the ATF, the United States Drug Enforcement Administration, the New Jersey State Police, and local law enforcement have been investigating the 230 Boys. The 230 Boys, which is sometimes spelled, the "230 Boyz," is a street gang that operates primarily in and around Rosa Parks Boulevard and Godwin Avenue, within the City of Paterson, New Jersey (the gang's "turf"), and elsewhere. The investigation has consisted of, among other investigative tools, numerous controlled purchases of narcotics, consensually recorded telephone calls and text messages, physical surveillance, and analysis of telephone call detail records.

2. The 230 Boys gang derives its name from a central location in which the gang operates, a liquor store located at 230 Rosa Parks Blvd. An individual is eligible to join the 230 Boys if he resides within the gang's turf and is willing to participate in street-level narcotics sales. An individual gains credibility within the 230 Boys by selling large amounts of narcotics.

3. Members and associates of the 230 Boys are often involved in ongoing feuds with other local gangs, including the "4K Korner Boys," a street gang which operates primarily on Rosa Parks Boulevard between Keen and Lyon Streets and the Glock Boys, a street gang which operates primarily in the north side of Paterson and is often referred to by 230 Boys as "down the hill." The 230 Boys are in an alliance with "Uptop," a street gang which operates in

the vicinity of Governor and Carroll Streets, and whose membership includes individuals who previously belonged to the 230 Boys.

4. The investigation has revealed that each of the defendants is a member and associate of the 230 Boys, and that each of the defendants is involved in the trafficking of narcotics within Paterson, New Jersey, and elsewhere.

Conspiracy to Distribute Narcotics

5. The investigation has revealed that members and associates of the 230 Boys distribute narcotics, including heroin, fentanyl, and cocaine base, primarily along Godwin Avenue, between Rosa Parks Boulevard and East 18th Street, and in the vicinity of the 12th Avenue basketball courts, within Paterson, New Jersey.

6. Members of the 230 Boys sell heroin that is frequently mixed with fentanyl, a potent, synthetic opioid that is approximately 50 times stronger than heroin. Heroin and fentanyl distributed by the 230 Boys is packaged in glassine envelopes, commonly referred to as “decks.” These “decks” are commonly sold by the 230 Boys in “bundles” and “bricks.” In Paterson, a “bundle” commonly refers to approximately ten decks of heroin, grouped together. A “brick” commonly refers to approximately 50 decks, often packaged as five bundles that have been grouped together.

7. The 230 Boys distribute decks of heroin that are almost always stamped or labeled with various “brand names” in colored ink. These brand names allow the dealers and purchasers alike to differentiate and market batches of heroin. For example, as described herein, on various occasions, glassine envelopes stamped “9 ½” were sold by defendants AARYN ABRAMS, a/k/a “AI” (“ABRAMS”), NAJIER BOONE, a/k/a “Bebe” (“BOONE”), CARL BROWN, a/k/a “C Dub” (“BROWN”), JIMIR RICKS, a/k/a “40,” a/k/a “Red,” (“RICKS”), ISAIAH HARGROVE (“HARGROVE”), CEQUAN WHARTON, a/k/a “Ce” (“WHARTON”), and AMIR JONES, a/k/a “Wiz” (“JONES”). Moreover, on various occasions, glassine envelopes stamped “Dorney Park” were sold by defendants BOONE, JONES, RICKS, and HARGROVE.

8. The stamps used by members of the 230 Boys in the distribution of heroin and fentanyl, including but not limited to “9 ½,” “Dorney Park,” “Pandora,” and “I Am Back” have been linked to over 60 fatal overdoses in the District of New Jersey, from in or around September 2018 to the present.

9. Members and associates of the 230 Boys sometimes compete with each other for narcotics customers within the gang's turf. However, the investigation has shown that the 230 Boys work together to ensure that outsiders are unable to distribute narcotics within the turf. Thus, the 230 Boys work together to preserve and protect the power, territory, and reputation of the gang, and to hinder, obstruct, and prevent law enforcement officers from identifying participants criminal activities, from apprehending offenders of the crimes, and from successfully prosecuting and punishing the offenders.

10. The investigation has revealed the manner and means by which members and associates of the 230 Boys carried out the objectives of the charged conspiracies to distribute narcotics. Among other things, members and associates of the 230 Boys did the following in furtherance of the conspiracies' unlawful objectives:

- a. Negotiated narcotics sales inside and around various business establishments located within the gang's turf;
- b. Utilized abandoned properties and residential yards to store narcotics and narcotics proceeds;
- c. Represented the gang on social media, by using names, or "handles" that contained reference to the gang;
- d. Took affirmative steps to evade detection by law enforcement, including using multiple cellular telephone facilities to communicate with each other and with narcotics purchasers, and speaking in coded language to disguise the illicit nature of their discussions. For example, members and associates of the 230 Boys typically refer to bricks of heroin as "movies."

11. Often, multiple members and associates of the 230 Boys work together to distribute narcotics. For example, a more senior gang member may have "runners," or junior gang members who deliver narcotics to the customers of the gang. Indeed, at all times relevant to this Complaint, and based on physical surveillance, controlled purchases, and confidential source information, law enforcement learned that RICKS was a high-ranking member of the 230 Boys. As such, he sometimes utilized runners, including PETERSON ("PETERSON"), TYSON JACOBS ("JACOBS"), SHAQUILLE FAVOR ("FAVOR"), HARGROVE, and ABRAMS, to deliver narcotics to purchasers.

12. Additionally, 230 Boys gang members sometimes work as "lookouts" for other 230 Boys gang members, walking up and down the streets on which his fellow members are distributing narcotics to ensure that law enforcement is not in the vicinity. For example, as described herein, on or

about June 25, 2019, while MAURICE TISDALE ("TISDALE") provided narcotics to a purchaser, and WHARTON took possession of the proceeds from that sale, HARGROVE, JACOBS, and others acted as lookouts.

13. A 230 Boys gang member and associate may also be assigned the role of holding the narcotics proceeds. For example, on or about January 23, 2019, after BOONE sold approximately ten bricks of suspected heroin, he handed the proceeds to BROWN. On or about September 5, 2019, after BOONE sold a quantity of suspected cocaine base, he handed the proceeds to DAVINE CAMPBELL.

14. The investigation has also revealed that members and associates of the 230 Boys have access to firearms. For example, on numerous occasions in and around February 2019, BOONE agreed to assist a confidential source ("CS") in obtaining a firearm. ABRAMS also discussed firearms with a CS on or about May 23, 2019. During their conversation, ABRAMS explained to the CS, in sum and substance, that the people he (ABRAMS) knows who sell firearms did not want to part with their firearms because it was "getting hot," meaning that there were ongoing disputes in the area and the firearms were needed to protect the gangs' turf. Law enforcement also reviewed photographs that revealed that members and associates of the gang possessed firearms.

Controlled Buys of Heroin, Fentanyl, and Cocaine Base

15. Between on or about September 2018 and on or about October 1, 2019, using more than one confidential source ("CS"), law enforcement conducted numerous controlled purchases of narcotics, to include heroin, fentanyl, and cocaine base, from members and associates of the 230 Boys. Prior to each controlled purchase, law enforcement officers outfitted each CS and/or his/her vehicle with audio and video recording devices. Law enforcement also provided each CS with U.S. currency to use to purchase the controlled substances. These controlled purchases are outlined in the chart, below:

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
Sept. 18, 2018	GRIER	5 bricks	Heroin and Fentanyl (L)
Oct. 10, 2018	GRIER	3 bricks, stamped "Avengers" and "Kiki," and 8 capsules	Heroin, Fentanyl, and Acetyl Fentanyl (L); Cocaine testing is pending
Nov. 21, 2018	RICKS and PETERSON	1 brick, stamped "Pandora"	Heroin and Fentanyl (L)
Dec. 3, 2018	RICKS and JACOBS	2 bricks, stamped "Ninja"	Heroin and Fentanyl (L)
Dec. 5, 2018	KELSON	1 brick, stamped "Larry Bird"	Heroin and Fentanyl (L)
Dec. 17, 2018	KELSON	3 bricks, stamped "Larry Bird" and "Fiji Water"	Heroin and Fentanyl (L)
Jan. 9, 2019	KELSON	2 bricks, stamped "Game Is On"	Heroin and Fentanyl (L)
Jan. 16, 2019	KELSON	2 bricks and 7 bundles, stamped "Game Is On" and "Larry Bird"	Heroin (L)
Jan. 17, 2019	ABRAMS	2 bricks, stamped "9 ½"	Heroin (L)
Jan. 23, 2019	BOONE and BROWN	10 bricks, stamped "9 ½"	Heroin (L)
Jan. 23, 2019	RICKS and FAVOR	5 bricks, stamped "Valencia"	Heroin and Fentanyl (L)
Jan. 29, 2019	RICKS	3 bricks, stamped "Apple"	Heroin and Fentanyl
Jan. 31, 2019	BOONE	10 bricks, stamped "9 ½"	Heroin (L)
Feb. 6, 2019	RICKS	5 bricks, stamped "9 ½"	Heroin (L)
Feb. 7, 2019	BOONE	20 bricks, stamped "9 ½" and "Blue Magic"	Heroin (L)

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
Feb. 11, 2019	RICKS	5 bricks, stamped "Pandora"	Heroin and Fentanyl (L)
Feb. 14, 2019	BOONE	20 bricks, stamped "9 ½"	Heroin (FT)
Feb. 19, 2019	RICKS and HARGROVE	4 bricks, stamped "9 ½"	Heroin and Fentanyl (L) ¹
Feb. 21, 2019	BOONE	20 bricks, stamped "Dorney Park"	Suspected heroin; laboratory testing is pending
Feb. 21, 2019	JONES and WHARTON	1 bundle, stamped "9 ½"	Heroin (FT)
Feb. 21, 2019	KELSON	3 bricks, stamped "Ride It" and "Emergency 911"	Heroin (L)
Feb. 25, 2019	RICKS and HARGROVE	5 bricks, stamped "9 ½"	Heroin and Fentanyl (L) ²
Feb. 28, 2019	KELSON	4 bricks and 5 bundles, stamped "Bugsy," and "Hands Up" ³	Heroin and Fentanyl (L)
Feb. 28, 2019	BOONE and Individual-1	20 bricks, stamped "Summer"	Heroin (FT)
Feb. 28, 2019	JONES and Individual-2	3 bundles, stamped "Dorney Park" and "9 ½"	Heroin (FT)
March 6, 2019	RICKS and HARGROVE	5 bricks, stamped "Dorney Park"	Heroin and Fentanyl (L)

¹ Testing of one glassine confirmed trace amounts of fentanyl and heroin; additional laboratory testing is expected.

² Testing of one glassine confirmed trace amounts of fentanyl and heroin; additional laboratory testing is expected.

³ Three bricks were not stamped.

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
March 7, 2019	JONES	3 bundles, stamped "Dorney Park"	Heroin (FT)
March 11, 2019	RICKS and ABRAMS	5 bricks, stamped "Robin Hood"	Heroin and Fentanyl (L) ⁴
March 14, 2019	JONES	3 bundles, stamped "9 ½"	Heroin (FT)
March 14, 2019	BOONE	20 bricks, stamped "Love"	Heroin (FT)
April 16, 2019	RICKS	3 bricks, stamped "Rolex" and "Dorney Park"	Suspected heroin; laboratory testing is pending
April 23, 2019	BRINKLEY	3 bricks, stamped "Welcome to Sinaloa"	Suspected heroin; laboratory testing is pending
May 2, 2019	ABRAMS	5 bricks, stamped "Call Ocho 8"	Suspected heroin; laboratory testing is pending
May 17, 2019	RICKS and JACOBS	3 bricks, stamped "Route 20"	Suspected heroin; laboratory testing is pending
May 23, 2019	ABRAMS	5 bricks, stamped "Sweet Dreams"	Suspected heroin; laboratory testing is pending
July 17, 2019	BROOKS	6 bundles, stamped "Raptors 909" and "City Boys"	Suspected heroin; laboratory testing is pending
Sept. 5, 2019	BOONE and CAMPBELL	34 grams	Suspected cocaine base; laboratory testing is pending

⁴ Testing of one glassine confirmed trace amounts of fentanyl and heroin; additional laboratory testing is expected.

GRIER's Sales of Narcotics to Other Individuals

October 17, 2018 Sale of Heroin

16. On or about October 17, 2018, law enforcement conducting surveillance observed TAWAAN GRIER, a/k/a "TJ" ("GRIER"), a known member of the 230 Boys, approach a black Chrysler (the "Chrysler") parked at a location in Paterson, New Jersey. GRIER entered the rear seat of the Chrysler, sat for approximately one minute, and then exited the Chrysler, which drove off. Based on investigators' training and experience, they believed that they had observed a narcotics transaction. Investigators stopped the Chrysler, which was driven by Individual-3. During a lawful search of the Chrysler, investigators recovered two bundles of suspected heroin, stamped "Snowfall." Individual-3 was placed under arrest.

17. Laboratory testing confirmed the presence of heroin in one of the bundles sold by GRIER.

November 7, 2018 Sale of Cocaine Base

18. On or about November 17, 2018, law enforcement conducting surveillance observed GRIER walk along Rosa Parks Boulevard in Paterson, New Jersey, in the vicinity of Fair Street. GRIER appeared to be looking for someone. Surveilling investigators then observed GRIER approach a gray Chevrolet (the "Chevrolet") that stopped in front of GRIER. GRIER engaged in what appeared, based on the training and experience of the surveilling officers, to be a narcotics transaction, that is, an exchange of narcotics for money. Investigators stopped the Chevrolet, which was driven by Individual-4, and lawfully recovered approximately seven capsules of what the investigators, based on their training and experience and the facts of the investigation, believed contained cocaine base, as well as a pipe, from inside the Chevrolet. Individual-4 was subsequently placed under arrest.

19. The seven capsules were submitted for laboratory testing. Testing revealed that cocaine was present within. Further laboratory testing, which will demonstrate that the substance contained cocaine base, is pending.

Seizures From 230 Boys Gang Members and Associates

April 11, 2019 Seizure from Najier Boone's Vehicle

20. On or about April 11, 2019, BOONE was shot while driving a rental vehicle (the "Vehicle") in the vicinity of Harrison Street in Paterson, New Jersey. Pursuant to a lawful search of the Vehicle, law enforcement officers recovered approximately four bricks of suspected heroin, stamped, "I AM BACK," on the dashboard. Approximately \$190 and four cellular phones were also recovered. BOONE was also found in possession of approximately \$3,895.

21. Laboratory testing later confirmed the presence of heroin in the aforementioned four bricks.

June 25, 2019 Seizure from Tisdale, Hargrove, and Jacobs

22. On or about June 25, 2019, investigators on surveillance in Paterson, New Jersey (the "Location") observed a blue Honda vehicle (the "Honda") park at a location in Paterson, New Jersey, where a group of young men, including TISDALE, HARGROVE, JACOBS, and WHARTON were congregating. TISDALE and WHARTON approached the Honda while the other men, including HARGROVE and JACOBS, acted as lookouts. After a brief interaction, TISDALE handed items with the driver of the Honda and WHARTON obtained what appeared to be U.S. currency from the driver of the Honda. TISDALE then returned to the group of men. The driver of the Honda exited the car and placed items in the Honda's exterior gas cap door, then reentered the car and drove off.

23. Investigators believed that they had observed a narcotics investigation, and stopped the Honda. During a lawful search of the Honda, investigators recovered eight glassines of suspected heroin, stamped "Bugatti," from the Honda's exterior gas cap. Investigators then returned to the Location and attempted to place TISDALE under arrest. TISDALE, HARGROVE, JACOBS, and the other men with whom they were standing began to flee the area upon observing the approach of law enforcement.

24. Ultimately, law enforcement was able to detain HARGROVE, TISDALE, and JACOBS. During a lawful search, law enforcement recovered approximately four bundles of suspected heroin, stamped "Bugatti," and approximately \$438 from HARGROVE. Law enforcement recovered approximately seven bundles of suspected heroin, stamped "Top Secret," and approximately \$190 from JACOBS. Investigators also recovered approximately \$420 from TISDALE.

September 9, 2019 Seizure from Dwayne Northern

25. On or about September 9, 2019, a law enforcement officer conducting surveillance in a vehicle (the "Honda") parked in the vicinity of Godwin Avenue and Rosa Parks Boulevard in Paterson, New Jersey, heard Dwayne Northern, a/k/a "D Black," a/k/a "Black" ("NORTHERN"), who was standing less than 10 feet from the officer's car, ask a passerby, in sum and substance, if he wanted to purchase heroin. NORTHERN stated that his product was "fire," which I know, based on my training and experience and the facts of the investigation, is a phrase used to indicate that a quantity of narcotics is of high quality. The officer then observed NORTHERN speaking with a second individual (the "Purchaser"). NORTHERN and the purchaser then walked to an abandoned lot. NORTHERN retrieved items from a black plastic bag hidden in a bush (the "Bag"), and gave them to the Purchaser in exchange for a quantity of U.S. currency.

26. The observing officer retrieved the Bag and discovered approximately 103 glassines of a substance which, based on his training and experience, contained heroin. The glassines were stamped, "X-BOX." Law enforcement arrested NORTHERN and recovered approximately \$250 and a cellular phone from his person.