

UNITED STATES DISTRICT COURT

for the
District of New Jersey

ORIGINAL FILED
MAR - 9 2020
WILLIAM T. WALSH, CLERK

United States of America

v.

Erick Bell, a/k/a "E"

Case No.

20-MJ-2030 (JS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2020 to March 2020 in the county of Camden in the District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 846

Conspiracy to Distribute and to Possess with Intent to Distribute Oxycodone (See Attachment A)

This criminal complaint is based on these facts:

See Attachment B (Affidavit)

Continued on the attached sheet.

Complainant's signature

Complainant's signature

Stuart Sobin, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/09/2020

Judge's signature

Judge's signature

City and state: Camden, New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: /s/ Gabriel J. Vidoni

Gabriel J. Vidoni, Assistant U.S. Attorney

Sara F. Merin, Assistant U.S. Attorney

Date: March 9, 2020

ATTACHMENT A

(Conspiracy to Distribute Oxycodone)

From at least in or about January 2020 to in or about March 2020, in Camden County, in the District of New Jersey and elsewhere, defendants

ERICK BELL, a/k/a "E";
ALFRED KEE, JR., a/k/a "Malik," a/k/a "Curly";
STEVEN WALKER;
WILLIAM SUMMERS, a/k/a "Uncle Butch," a/k/a "Butch";
DERRICK LEWIS, a/k/a "Delvin Jones";
ROCCO DEPODER, a/k/a "Rock";
MAURICE WILLIAMS;
ANWAR ABDULLAH; and
ANTWAN TUCKER

did knowingly and intentionally conspire and agree among themselves and with others to distribute and possess with intent to distribute quantities of oxycodone, 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.

ATTACHMENT B

I, Stuart Sobin, am a Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, depose, and state that:

I. INTRODUCTION

1. I am an investigative or law enforcement officer of the United States and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am presently assigned to the Philadelphia Division, Cherry Hill Resident Agency, of the FBI. I have been an FBI Special Agent since 2012. In my capacity as a Special Agent, I have received extensive formal investigative training at the FBI's training academy in Quantico, Virginia and elsewhere. I have also received basic drug and gang training, as well as advanced training that involved drugs and gangs.

3. Through my training and experience, I am knowledgeable of the United States laws that apply to drug trafficking and money laundering. I am familiar with, and have employed, various investigative techniques. I have applied for, and executed, federal and state search warrants which have resulted in the seizure of illegal drugs, evidence of drug violations, and assets acquired with drug proceeds. I have previously been involved in investigations that utilized T-III interceptions, which led to the arrest and conviction of subjects for drug possession, distribution, and money laundering, as well as seizures of illegal drugs, weapons, and assets involved in drug trafficking.

4. Based upon the above training and experience, I am also familiar with the methods of operation of persons involved in illicit distribution of controlled substances, including prescription medicines, as well as terminology used by persons involved in the illicit distribution of controlled substances. I also have experience investigating individuals and organizations that illegally distribute and dispense controlled substances – including but not limited to oxycodone – under the guise of operating seemingly legitimate medical clinics, colloquially known as "pill mills," and the individuals who obtain, and illegally divert or abuse, controlled substances obtained from such "pill mills[.]" Typically, an individual who seeks to abuse or illegally divert controlled substances will go to one of these medical clinics. Individuals who obtain prescriptions for the purpose of illegally diverting those prescriptions will often re-sell all but one or two pills from a prescription, reserving the remaining pills to take shortly prior to the appointment for that patient's next prescription to assure a positive urine screen.

5. I have not included every detail of every aspect of my training, education, and experience, but rather have highlighted those areas most relevant to this application. I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge and on information obtained from other sources, including: (a) statements made or reported by witnesses with knowledge of relevant facts; (b) my review of publicly-available information relating to the defendants; (c) my review of business records, other documents, and evidence obtained through court orders, subpoenas, and other sources; (d) law enforcement surveillance; (e) my review of photographs and video involving the defendants; and (f) court-authorized interceptions of wire and electronic communications occurring over Rocco DePoder's telephones (Target Phone-1 and Target Phone-2), Erick Bell's telephone (Target Phone-3), and/or Alfred Kee, Jr.'s telephone (Target Phone-4) during the relevant time period of this Complaint.

6. Because this Criminal Complaint is being 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 content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part, and the content of statements and meetings are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared by federal law enforcement personnel who monitored court-authorized wiretaps. All dates and times are approximate. Unless otherwise indicated, conversations and communications referred to herein were recorded.

A. The Controlled Substances Involved in this Offense

7. The Controlled Substances Act ("CSA"), codified in Title 21 of the United States Code, and its promulgating regulations, classified drugs into five schedules depending on a drug's acceptable medical use and its abuse and dependency potential.

8. Schedule I controlled substances, such as heroin, do not have an acceptable medical use in the United States. Schedule II through Schedule V controlled substances have acceptable medical uses.

9. The medical use of Schedule II controlled substances are severely restricted because such drugs have a high potential for abuse. Schedule II controlled substances include prescription medicines such as such as oxycodone (commonly known by the brand names OxyContin and Percocet¹) and hydrocodone (commonly known as Vicodin).

¹ Percocet is the brand name for a combination drug which consists of oxycodone and acetaminophen.

10. As it pertains to the investigation which is the subject of this Affidavit:

a. Oxycodone is a Schedule II controlled substance, which is typically used for the relief of pain. Oxycodone is generally formulated in strengths of 15 milligrams ("mg"), 20 mg, 30 mg, 40 mg, 60 mg, and 80 mg; and when combined with non-controlled substances like acetaminophen, oxycodone comes in strengths of 2.5 mg, 5 mg, 7.5 mg, and 10 mg, with combinations of 325 mg of acetaminophen. It is sold in tablet, capsule, and liquid forms, is marketed either alone as an extended-release medication (for example, OxyContin), immediate-release medication (for example, OxyIR), or, as noted above, in combination with other non-narcotic analgesics like acetaminophen (for example, Oxycet, Percocet, Roxicet, Xartemis XR, others); aspirin (for example, Percodan); and ibuprofen. Illicit dealers/consumers of oxycodone often refer to oxycodone pills by their color or FDA imprint code. For example, 80 mg oxycodone pills are typically green in color; 60 mg pills are typically red; 40 mg pills are typically yellow; and 10 mg and 15 mg pills are typically blue or gray. FDA imprint codes include "OP[,] " which is associated with Purdue Pharma and "RP[,] " which is associated with Rhodes Pharmaceuticals LP supplies.

b. In the Camden and Gloucester City area, I know, based on my training, experience, and information gathered from law enforcement agencies, that estimated street values for these pills are currently as follows:

Dosage	Approx. Bulk Price	Approx. End User Price
80 mg oxycodone	\$25	\$40
60 mg oxycodone	\$20-22	\$30
40 mg oxycodone	\$15-17	\$20
30 mg oxycodone	\$15	\$20-21
20 mg oxycodone	\$7.50	\$15
10 mg oxycodone	\$6	\$10

11. Schedule III controlled substances have a lower abuse potential than those in Schedule II, but a higher abuse potential than those in Schedule IV. Schedule V controlled substance represent the group with the least potential for abuse.

12. Title 21, United States Code, Section 802(10), provides that the term "dispense" means "to deliver a controlled substance to an ultimate user . . . by, or pursuant to the lawful order of, a practitioner, including the prescribing and administering of a controlled substance and the packaging, labeling or compounding necessary to prepare the substance for such delivery." Section 802(21) of Title 21 defines a "practitioner" to include a "physician."

13. The CSA authorizes Schedule II through Schedule V controlled substances to be dispensed to individuals pursuant to a lawful order, or, in other words, a valid prescription. 21 U.S.C. § 829.

14. In addition to registration requirements imposed by the State of New Jersey, physicians or practitioners must obtain and maintain a registration with the DEA authorizing them to prescribe controlled substances in the Schedules in which they are registered ("Registered Practitioner"). 21 C.F.R. § 1306.03.

II. PROBABLE CAUSE

A. Overview

15. From at least in or about January 2020 to in or about March 2020, Erick Bell ("BELL") and Alfred Kee, Jr. ("KEE") ran a drug trafficking operation in and around Camden, New Jersey, aided and assisted by defendants Steven Walker ("WALKER"), Derrick Lewis ("LEWIS"), and others, from whom BELL or KEE sought to obtain distribution quantities of oxycodone (collectively, the "Suppliers") and by WILLIAM SUMMERS ("SUMMERS"). In turn, BELL distributed and agreed to distribute oxycodone, in re-distribution quantities, to others, including Rocco DePoder ("DEPODER"), Maurice Williams ("WILLIAMS"), Anwar Abdullah ("ABDULLAH"), and ANTWAN TUCKER ("TUCKER") (collectively, the "Resellers").²

16. BELL and KEE employed the following methods and means in furtherance of this drug trafficking conspiracy: (a) BELL or KEE would solicit each other and the Suppliers, primarily over the telephone, to obtain saleable quantities of oxycodone; (b) BELL would receive deliveries of such oxycodone at BELL's home in Camden and other locations in southern New Jersey; (c) BELL would take orders for oxycodone from the Resellers and others, primarily over the telephone; (d) BELL would provide the Resellers with oxycodone at his home and in other locations in southern New Jersey; and (e) BELL, KEE, the Suppliers, and Resellers would take steps to conceal this narcotics trafficking operation, to include: (i) employing codes and oblique references in communications about oxycodone transactions conducted over the telephone and (ii) changing their use of telephones used to facilitate the operation.

² Neither BELL, KEE, nor any of the Suppliers are authorized by federal law to distribute controlled substances or are licensed within the State of New Jersey to prescribe controlled substances.

B. Summary of Acts in Furtherance of the Conspiracy

17. The following chart provides a summary of specific acts committed by BELL, KEE, the Suppliers, SUMMERS, and the Resellers in furtherance of this drug trafficking conspiracy:

Defendant	Affirmative Acts	¶ Key
BELL	BELL acquired and distributed and agreed to acquire and distribute pills from and to multiple persons.	<i>Passim</i>
KEE	KEE acquired and distributed and agreed to acquire and distribute pills from and to multiple persons	<i>Passim</i>
WALKER	WALKER facilitated the acquisition of re-distribution quantities of oxycodone to BELL.	17(e)
SUMMERS	SUMMERS worked with BELL to facilitate the acquisition and distribution of controlled substances.	17(d) 17(f) 17(g) 17(i)
LEWIS	LEWIS supplied re-distribution quantities of oxycodone to KEE.	17(j) 17(k)
DEPODER	DEPODER obtained re-distribution quantities of oxycodone from BELL, which BELL sourced from KEE.	17(a) 17(b)
WILLIAMS	DEPODER obtained re-distribution quantities of oxycodone from BELL, which BELL sourced from KEE.	17(b) 17(g) 17(m)
ABDULLAH	ABDULLAH obtained re-distribution quantities of oxycodone from BELL.	17(e) 17(h)
TUCKER	TUCKER obtained re-distribution quantities of oxycodone from BELL.	17(c) 17(f)

C. Specific Instances in Which BELL and KEE Purchased and Attempted to Purchase Controlled Substances, including Oxycodone from the Defendant Suppliers, and Distributed Controlled Substances to Customers

18. To facilitate this drug trafficking operation, BELL, KEE, the Suppliers, the Resellers, and others engaged in, among other activity, the following conduct:

a. **On or about January 17, 2020, BELL (on KEE's behalf) and DEPODER agree to sale of oxycodone.** In this regard, on this date, BELL placed a telephone call to DEPODER and told DEPODER that "he want 22[,]" referring to KEE, whom toll records show that BELL had, minutes earlier,

spoken to on the telephone. DEPODER asked, "22 for what? The 60s?" BELL replied, "Yep." Based on my training and experience, the content of this call, and my knowledge of the investigation to date, I believe that "22" referred to \$22, the price that KEE sought for "the 60s[.]" which referred to 60 mg dose oxycodone pills. DEPODER told BELL to tell BELL's source of supply – KEE – that DEPODER did not want the pills, and said, "I ain't payin' him [\$]22 for that[.]" Despite this, DEPODER and BELL continued to communicate, arranging to meet after DEPODER's son's basketball game concluded. During one of these calls, BELL instructed DEPODER that, "I'm at my house. Come straight to my house" to which DEPODER replied, "Alright. I gotta go to my house. Take my son home, go to my house, and get my money." Toll records indicate that, during this time, BELL was in contact with KEE. According to law enforcement surveillance, BELL went to DEPODER's home in Gloucester City, New Jersey. Later, on or about January 20, 2020, while BELL and DEPODER were discussing BELL's offer of 80 mg oxycodone pills sourced from KEE for \$30 per pill, and BELL's suggestion that DEPODER counter-offer for \$27 per pill, DEPODER, referred back to the January 17th oxycodone transaction stating, "I ain't, why should I pay that? I just bought, I just bought 60 for 22. What the fuck am I going to pay 27 for . . . I just got them yesterday." Based on my training and experience, the content of these calls, and my knowledge of the investigation to date, I believe that, on January 17th, BELL delivered the 60 mg oxycodone pills to DEPODER at DEPODER's home for \$22 each.

b. **On or about February 3, 2020, BELL and KEE agreed to provide DEPODER and WILLIAMS with oxycodone at certain prices.** Specifically, on this date, BELL and WILLIAMS agreed over the telephone that WILLIAMS would purchase "the whole thing" (referring to a significant quantity of oxycodone) from BELL. BELL later telephoned DEPODER, and BELL and DEPODER agreed that DEPODER would purchase 60 pills after BELL described the pills to DEPODER, stating, "I'm talking about these are still in the sealed bottle and they say 80s on 'em, bro" (80 mg oxycodone pills). Further vouching for the product, BELL told DEPODER: "They legit. They not fake." DEPODER stated that he would "take them all[.]" BELL then spoke to KEE on the telephone and told KEE that "the white boy" (DEPODER) "wants 60 of 'em[.]" and "[t]he other boy" (WILLIAMS) want 100 of 'em." BELL and KEE discussed pricing, agreeing that the price for WILLIAMS was "24" dollars per pill and the price for DEPODER was "25" dollars per pill. According to law enforcement surveillance, KEE then traveled to BELL's home in Camden and met BELL, at which point BELL called WILLIAMS and told WILLIAMS that KEE was at BELL's house. KEE and BELL then traveled to the vicinity of Gloucester City. KEE waited near a convenience store while BELL went to DEPODER's home in Gloucester City, calling DEPODER once he arrived and stating, "I'm outside." After making the delivery of oxycodone to DEPODER within DEPODER's home, BELL re-joined KEE near the convenience store.

c. **On or about February 4, 2020, BELL agreed to sell TUCKER oxycodone.** In this regard, on this date, BELL telephoned TUCKER and offered to sell TUCKER a redistribution quantity of oxycodone pills. Namely, BELL told TUCKER, "I got fifty of the things." TUCKER responded, "[m]an people been callin' me all day for the things." BELL confirmed he would make the sale, stating "I'll bring them to you." Later the same day, BELL received an incoming text message from TUCKER stating, "Yo bro I got \$300[.]" In and around the Camden area, 10 mg pills of oxycodone typically sold for \$6 per pill, thus the transaction discussed by BELL and TUCKER was likely 50 10 mg oxycodone pills for \$300.

d. **On or about February 6, 2020, BELL asks SUMMERS about the pain pills SUMMERS has.** Specifically, on this date, during a telephone conversation, BELL solicited SUMMERS, also called "Uncle Butch" or "Butch" (who also drove BELL on errands related to the drug operation), for "pain medicine[.]" Namely, SUMMERS told BELL that SUMMERS went to the doctor and BELL asked, "they gave you pain medicine?" SUMMERS replied, "Yeah, I got it at the house. I picked my prescription up." BELL inquired "[w]hat kind of pain medicine they give you[.]" to which SUMMERS responded, "They give me some, some white pills" but "they ain't nothing but like some old dumb shit. I don't know the name of them." BELL responded, "I know but you said you was gonna ask for some pain pills[.]" SUMMERS told BELL that SUMMERS "didn't see that doctor" and that SUMMERS is "seein' two different doctors." Later the same day, SUMMERS called BELL and told BELL, "come by 725, I wanna show you these white pills I got." BELL agreed, stating, "I heard you."

e. **On or about February 13, 2020, BELL and WALKER agreed over the telephone that WALKER would supply BELL with 148 pills from a 150 pill prescription that BELL agreed to provide to ABDULLAH.** In this regard, on that date, while on the telephone, BELL asked WALKER, "[w]hat's the count[.]" to which WALKER replied, "150 but I need you to cover me[.]" agreeing eventually that WALKER would "take the two count[.]" or retain 2 of the 150 pills for WALKER's own use. Once the sale was agreed upon, BELL told WALKER, "let me call the dude now[.]" BELL then spoke to ABDULLAH over the telephone, and ABDULLAH agreed to purchase "148" pills, which were "the 20" (meaning 20 mg oxycodone pills) and "gray[.]" BELL told ABDULLAH that BELL did not yet have the pills in hand, and he was "waitin' for him [WALKER] to get 'em . . . I'm just gonna come to you and get the money right now." In a subsequent call, BELL and ABDULLAH agreed on the price and quantity of pills, with BELL stating, "[i]t's 2200 [dollars], it's 148 [referring to the number of pills] [.]" BELL and WALKER then spoke on the telephone about when WALKER would be able to provide the pills to BELL, and WALKER told BELL, "'she just went to the doctor, so she probably just gettin' there now, so, give it about like an hour, hour and half. 'Cause she got to go to [Camden Pharmacy-A] to get it." BELL then spoke to ABDULLAH on the telephone and

agreed to supply ABDULLAH with the oxycodone from WALKER at ABDULLAH's workplace later that day. Thereafter, that same day, WALKER went to BELL's home in Camden to deliver the oxycodone. According to pharmacy information, WALKER's wife filled a prescription for 150 20 mg oxycodone pills on February 13, 2020 at Camden Pharmacy-A.

f. **On or about February 18, 2020, SUMMERS drove BELL to meet with TUCKER to collect the proceeds of a drug transaction.** In this regard, on that date, during a telephone conversation, BELL and TUCKER made plans to meet to conduct a drug transaction. Namely, BELL told TUCKER, "I'm on my way to get some three tens from you." TUCKER responded, "I'm about to give you the thirty dollars cause she sold all them shits, unless you wanna wait till Thursday I get my fifteen." BELL replied, "No, I'll come get the thirty dollars from you." According to law enforcement surveillance, later that day, SUMMERS drove BELL to Woodbury, New Jersey. BELL then met with TUCKER and another male at a park in Woodbury, New Jersey.

g. **On or about February 18, 2020, BELL and KEE agreed to provide WILLIAMS with oxycodone and SUMMERS drove BELL to meet with KEE to obtain the oxycodone to provide to WILLIAMS.** Specifically, on that date, over the telephone, WILLIAMS requested that BELL "grab me 83 of . . . the 60s[.]" BELL told WILLIAMS, "I gotta see how many he got . . . [h]e might only have 60 of them" – meaning a quantity of 83, 60 mg pills. BELL then called KEE and asked "you still got whicha callem[.]" to which KEE responded that he did and had 60. BELL told KEE that "he" – WILLIAMS – wanted 83 of them. Shortly thereafter, BELL and KEE spoke again on the telephone, KEE asked who was looking to buy the 83 pills, and BELL told KEE "the other boy[.]" namely WILLIAMS. KEE told BELL, "hold on, let me see something, let me make a call real quick, I might be able to get it." BELL then spoke to WILLIAMS and told WILLIAMS that the price for each pill was "21[.]" KEE called BELL back and told BELL that "I got 120 of 'em[.]" BELL told KEE that "he" – WILLIAMS – "wanted a straight hundred[.]" BELL then called WILLIAMS and confirmed that WILLIAMS would purchase 100 pills. Thereafter, that same day, according to law enforcement surveillance, KEE went to BELL's home in Camden to deliver the oxycodone. According to law enforcement surveillance, SUMMERS drove BELL to BELL's home to meet KEE and obtain the oxycodone. Shortly thereafter, WILLIAMS went to BELL's home to purchase the oxycodone. Once the sale to WILLIAMS was complete, BELL then met with KEE near BELL's home in Camden.

h. **On or about February 21, 2020, BELL served as a middleman, purchasing oxycodone from Individual-A for ABDULLAH, using ABDULLAH's money.** Specifically, on this date, during a telephone call, an unidentified male ("Individual A") told BELL that, "Dude got 120 in the whites if you want 'em[.]" later clarifying that Individual A was referring to "one-

fives[,]” namely white-colored 15 mg oxycodone pills. BELL replied, “I’m gonna call it right now.” Minutes later, BELL telephoned ABDULLAH and asked ABDULLAH to assist BELL in purchasing approximately 120 15 mg dose oxycodone pills – described as “white” “fifteens” – for a total of \$1,440. BELL then agreed to meet ABDULLAH, who instructed BELL to come to “the crib[,]” Based on my training and experience, the content of this call, and my knowledge of the investigation to date, I believe that this meeting was for BELL to pick up, from ABDULLAH, payment for the oxycodone pills that BELL was to purchase from Individual-A. BELL then called Individual-A, confirmed that the transaction would be for “120[,]” and engaged in a series of communications regarding their meeting location. Later the same day, according to intercepted communications, BELL and Individual-A agreed to have met “near” a “school” in or around Whitman Park in Camden so that BELL could purchase the oxycodone pills from Individual-A. After that meeting, BELL telephoned ABDULLAH and agreed to meet ABDULLAH at ABDULLAH’s “job in Camden[.]” Based on my training and experience, the content of this call, and my knowledge of the investigation to date, I believe that the purpose of this meeting was for BELL to provide ABDULLAH with the oxycodone pills BELL purchased from Individual-A.

i. **On or about February 21, 2020, SUMMERS solicited BELL to distribute oxycodone to another individual.** Specifically, on this date, SUMMERS telephoned BELL and asked whether “you [BELL] got any OPs on you?” – referring to oxycodone (oxycodone pills manufactured by Purdue Pharmaceuticals are marked with the mg dosage on one side and “OP” on the other). BELL told SUMMERS that he did not, and SUMMERS relayed that message to another individual in SUMMERS’ presence, stating, “[n]ah babe, he ain’t got none.”

j. **On or about February 24, 2020, LEWIS informed KEE that LEWIS had oxycodone for sale.** Specifically, on this date, KEE spoke over the telephone with LEWIS, and LEWIS immediately advised that LEWIS had a quantity of oxycodone for distribution, saying to KEE, “Got RP 15s” – 15 mg oxycodone pills. KEE responded by asking for LEWIS’s whereabouts. LEWIS replied, “I’m on the lot[,]” and KEE said, “[a]lright.” As explained in the Introduction Section above, based on my training and experience, the content of this call, and my knowledge of the investigation to date, I believe that RP 15s is code for 15 mg dose oxycodone pills, because Rhodes Pharmaceuticals LP supplies 15 mg dose oxycodone hydrochloride pills that are white in color, oval in shape, and imprinted on one side with “R” “P” with a vertical line between the two letters and imprinted on the other side with “15[.]”

k. **On or about February 26, 2020, LEWIS informed KEE that LEWIS was attempting to obtain a supply of oxycodone from other individuals.** Specifically, on this date, KEE spoke over the telephone with LEWIS, and LEWIS and KEE discussed meeting: LEWIS stated, “I’m just getting

here[.]” and KEE replied, “[a]lright, I’ll be there in a couple of minutes.” LEWIS then told KEE, “Oh, I’m about to see something, ‘cause I ain’t got shit on me yet, so I gotta see what I can grab, but there’s people out here they said they got thirties.” Based on my training and experience, the content of this call, and my knowledge of the investigation to date, I believe that, at the time of this conversation, LEWIS did not have any oxycodone to sell KEE, but LEWIS expected to obtain “thirties” – referring to 30 mg oxycodone pills – for sale from individuals around him in time to supply those oxycodone pills to KEE. KEE agreed to this arrangement, stating, “[o]h, okay, alright.”

1. **On or about March 4, 2020, KEE offered BELL a quantity of oxycodone for sale.** In this regard, on this date, during a telephone conversation, KEE offered BELL “the six O[.]” likely referring to 60 mg dose oxycodone pills. BELL told KEE that BELL would call “him and see what he say” – namely call BELL’s customer to see if BELL’s customer wanted to buy the pills. Regarding quantity, KEE told BELL “I got 60 of them. I’ll have more . . . tomorrow.” During this call, BELL also informed KEE that BELL had been calling KEE from “a 413” number and that was BELL’s “other phone. ‘Cause this number – I’m a, I’m a let this number go off.” BELL told KEE, “I’ll call and see what’s up[.]”

m. **On or about March 5, 2020, WILLIAMS solicited BELL to sell WILLIAMS oxycodone provided by KEE.** Specifically, on this date, WILLIAMS telephoned BELL and BELL told WILLIAMS, “I only got, he had 60 of the sixties yesterday, that was it[.]” Based on my training and experience, the content of this call, and my knowledge of the investigation to date, I believe that BELL was referring to KEE’s having offered BELL 60 60 mg oxycodone pills for sale the prior day as set out above in paragraph 18(n). WILLIAMS then told BELL, “I needed them[.]” and chastised BELL for BELL’s lack of communication with WILLIAMS, stating, “you don’t be communicating with me big guy[.]” BELL offered to “call him (BELL’s source of supply) right now, he probably still got ‘em.” WILLIAMS agreed that BELL should call KEE and then told BELL, “[e]verybody wondering what we doin’. They sayin’, we lettin’ the business go.” BELL informed WILLIAMS, “I’m gonna call him right now, yo.” As surveilled by law enforcement, later the same day, WILLIAMS and BELL met on the back porch of BELL’s home in Camden.