
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **SUPERSEDING CRIMINAL**
 : **COMPLAINT**
 v. :
 : Honorable Leda Dunn Wettre
 IBRAAHEEM ISLAM, :
 a/k/a "ISH" : Mag. No. 20-12201

I, Michael T. Bustard, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

SEE ATTACHMENT B

s/ Michael T. Bustard

Michael T. Bustard, Special Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Special Agent Bustard attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)

June 1, 2020 at 1:05 PM at District of New Jersey
Date County and State

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE

s/ Leda Dunn Wettre

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Cocaine Base)

On or about May 1, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IBRAAHEEM ISLAM,

a/k/a "Ish,"

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

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWO

(Possession with Intent to Distribute Cocaine Base)

On or about May 26, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IBRAAHEEM ISLAM,

a/k/a "Ish,"

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

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

(Possession with Intent to Distribute Cocaine Base)

On or about May 30, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IBRAAHEEM ISLAM,

a/k/a “Ish,”

knowingly and intentionally did possess with the intent to distribute twenty-eight (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 FOUR

(Possession of a Firearm by a Convicted Felon)

On or about May 30, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IBRAAHEEM ISLAM,

a/k/a "Ish,"

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, namely a 5.7x28 millimeter caliber FN Herstal model "FN Five-SeveN" pistol, bearing serial number 386337711, loaded with seventeen (17) rounds of 5.7x28 millimeter caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 30, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IBRAAHEEM ISLAM,

a/k/a "Ish,"

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, did knowingly possess a firearm, namely a 5.7x28 millimeter caliber FN Herstal model "FN Five-SeveN" pistol, bearing serial number 386337711, loaded with seventeen (17) rounds of 5.7x28 millimeter caliber ammunition.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

ATTACHMENT B

I, Michael T. Bustard, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. From at least on or about April 17, 2020 to on or about May 27, 2020, law enforcement observed IBRAHEEM ISLAM (“ISLAM”) engage in conduct consistent with hand-to-hand narcotics transactions on a regular basis in the vicinity of 103 Chadwick Avenue, Newark, New Jersey (“103 Chadwick”).¹

2. For example, on or about May 1, 2020, ISLAM engaged in at least three suspected narcotics transactions. As described in more detail below, law enforcement stopped one individual shortly after his interaction with ISLAM and recovered approximately four jugs containing suspected cocaine base. The May 1, 2020 transactions are summarized as follows:

a. At approximately 3:58 p.m., an unidentified female (“UF-1”) approached and interacted with ISLAM in the vicinity of 112 Chadwick Avenue.² ISLAM then walked to a white 1993 Ford Thunderbird bearing New Jersey license plate number K62MCH (the “Thunderbird”), which was parked across the street from the driveway of 103 Chadwick. UF-1 remained in the area of 112 Chadwick Avenue for a brief period, where she was observed holding what appeared to be an unknown quantity of currency and congregating with known drug associates of ISLAM. UF-1 then approached the Thunderbird. ISLAM exited the driver’s seat of the Thunderbird and met with UF-1, and the two walked northbound on Chadwick Avenue. ISLAM was then

¹ The property located at 103 Chadwick is a residential building with two townhouse units, which is located approximately halfway between Clinton Avenue and Madison Avenue. The property is located off of Chadwick Avenue behind another residential building. There is a driveway that leads from Chadwick Avenue to parking spaces in front of 103 Chadwick. Neither the townhouses located at 103 Chadwick nor the parking spaces at the end of the driveway are visible from the vantage point of Chadwick Avenue.

² All properties on Chadwick Avenue referenced within this Complaint are located in Newark, New Jersey.

observed exchanging unknown objects with UF-1 outside of 114 Chadwick Avenue.

b. At approximately 6:48 p.m. on May 1, 2020, an unidentified male (“UM-1”) approached and interacted with ISLAM outside of 112 Chadwick Avenue. After a few seconds, ISLAM gestured toward the northbound side of Chadwick Avenue. ISLAM then approached the Thunderbird and entered through the driver’s door. Within one minute, ISLAM exited the Thunderbird, at which point UM-1 began walking toward ISLAM. ISLAM and UM-1 then walked northbound on Chadwick Avenue and ISLAM provided UM-1 with an unknown quantity of small objects.

c. Less than five minutes later, at approximately 6:52 p.m., another male (“Buyer-1”) approached ISLAM on the sidewalk outside of 114 Chadwick Avenue. Law enforcement observed Buyer-1 and ISLAM extending their hands toward one another. ISLAM then entered the Thunderbird as Buyer-1 walked toward 110 Chadwick Avenue. After remaining in the Thunderbird for almost one minute, ISLAM exited the vehicle and met with Buyer-1 in the vicinity of 114 Chadwick Avenue. Buyer-1 was then observed placing his open hand underneath ISLAM’s hand. Buyer-1 subsequently removed an unknown quantity of currency from his wallet and handed it to ISLAM. After the interaction, ISLAM opened the driver’s door of the Thunderbird and briefly reached into the vehicle before closing the door. Buyer-1 walked northbound on Chadwick Avenue for a short distance before turning around and walking back toward the Thunderbird. When Buyer-1 reached the Thunderbird, he turned around and walked northbound on Chadwick Avenue again, as ISLAM entered the driver’s side of the Thunderbird. Less than one minute later, ISLAM exited the vehicle holding an unknown object. ISLAM then walked toward Buyer-1 and placed an unknown object into Buyer-1’s hand. Less than ten minutes after the interaction between ISLAM and Buyer-1, local law enforcement officers stopped Buyer-1 approximately one quarter of a mile away from 114 Chadwick Avenue. As law enforcement approached Buyer-1, officers observed Buyer-1 holding a small neon jug of suspected narcotics. Law enforcement then stopped Buyer-1 and confirmed that he was in possession of approximately four plastic jugs containing suspected cocaine base.

3. On or about May 26, 2020, ISLAM engaged in at least six suspected narcotics transactions. As described in more detail below, law enforcement stopped one individual minutes after her interaction with ISLAM and recovered a vial containing suspected cocaine base. The May 26, 2020 transactions occurred as follows:

a. At approximately 5:28 p.m., law enforcement observed a purple 2016 Ford Mustang bearing New Jersey license plate number S38GAU (the “Mustang”) park in the vicinity of the intersection of Chadwick Avenue and Clinton Avenue. ISLAM then exited the Mustang and approached 103

Chadwick, which is located approximately one hundred and thirty (130) yards from the Chadwick and Clinton intersection. ISLAM walked up the driveway toward 103 Chadwick and out of law enforcement's view. GPS data obtained pursuant to a search warrant combined with video surveillance footage³ indicates that the Thunderbird was parked in the driveway in front of 103 Chadwick at that time. Approximately two minutes later, ISLAM walked back down the driveway and met with an unidentified female ("UF-2") near the parked Mustang, where ISLAM placed unknown items into UF-2's hand. ISLAM's repeated movements toward 103 Chadwick, along with his subsequent interactions with suspected narcotics purchasers, as described in this subparagraph and in the subparagraphs that follow, is consistent with ISLAM entering the Thunderbird to retrieve narcotics for distribution. The amount of time ISLAM spent in the driveway of 103 Chadwick during the May 26, 2020 transactions described herein is consistent with the amount of time he spent inside of the Thunderbird during prior suspected narcotics transactions that law enforcement observed when the Thunderbird was parked on Chadwick Avenue within law enforcement's view, including, but not limited to, the transactions that occurred on or about May 1, 2020 as outlined above.

b. Approximately thirty minutes later, around 6:00 p.m., ISLAM was approached by a woman ("Buyer-2") near the vicinity of Chadwick Avenue and Clinton Avenue. After a brief interaction, ISLAM walked back up the driveway toward the front of 103 Chadwick Avenue where the Thunderbird was parked. After approximately one minute and forty-five seconds, ISLAM walked back down the driveway and met with Buyer-2 in the area of 117 Chadwick Avenue, where he was observed placing unknown objects into Buyer-2's hand. Minutes later, law enforcement observed Buyer-2 in the area of Chadwick Avenue and Clinton Avenue. Buyer-2 was holding what appeared to be a yellow vial consistent with the type of container typically used to package narcotics for distribution. Law enforcement then stopped Buyer-2 and observed a glass vial with a yellow top in Buyer-2's hand. Law enforcement took possession of the vial and confirmed that it contained suspected cocaine base.

c. Less than an hour later, at approximately 6:53 p.m. on or about May 26, 2020, a white Cadillac stopped directly in front of the Mustang in the vicinity of 121 Chadwick Avenue for a brief period before proceeding northbound on Chadwick Avenue. The Cadillac stopped in front of 105 Chadwick Avenue. ISLAM then walked from the area of 119 Chadwick Avenue toward 103 Chadwick. As ISLAM passed the Cadillac, he briefly stopped and

³ Video surveillance footage captured the Thunderbird entering the driveway and driving toward 103 Chadwick at approximately 3:59 p.m. Once the vehicle traveled up the driveway and approached the building located at 103 Chadwick, the vehicle was no longer visible on the video surveillance footage. During that timeframe, GPS data indicated that the vehicle was in the vicinity of 103 Chadwick.

interacted with the Cadillac's occupants. ISLAM then walked up the driveway of 103 Chadwick and out of law enforcement's view. GPS data indicated that the Thunderbird remained parked in the driveway in front of 103 Chadwick during this time. After approximately two minutes, ISLAM walked back down the driveway and approached the Cadillac. ISLAM reached into the open driver's window and exchanged unknown items with the vehicle's occupants. As ISLAM walked southbound on Chadwick Avenue, he was observed interacting with a group of unidentified individuals for approximately one minute. During that time, ISLAM placed an unknown object into the hands of an unidentified male ("UM-2").

d. A few minutes later, at approximately 6:58 p.m. on or about May 26, 2020, ISLAM was approached by an unidentified male ("UM-3"). After interacting with UM-3, ISLAM was observed placing unknown items into his pocket as he walked toward 103 Chadwick. ISLAM then walked up the driveway of 103 Chadwick and out of law enforcement's view. GPS data indicated that the Thunderbird remained parked in the driveway in front of 103 Chadwick during this time. After approximately two minutes, ISLAM walked back down the driveway and met with UM-4 in the vicinity of 113 Chadwick Avenue. Law enforcement's view of this interaction was partially obstructed. After a few seconds, ISLAM walked back to the Mustang, entered the vehicle, and drove away.

e. Approximately one hour later, around 7:53 p.m. on or about May 26, 2020, law enforcement observed ISLAM standing next to the Mustang, which was parked across the street from 119 Chadwick Avenue. An unidentified male ("UM-4") approached and interacted with ISLAM. ISLAM then placed unknown objects into UM-4's hand.

f. At approximately 8:16 p.m. on or about May 26, 2020, an unidentified female ("UF-3") approached ISLAM in the area of 112 Chadwick Avenue. UF-3 reached into her pocket, extracted an unknown object, and extended her hand toward ISLAM. ISLAM then handed an unknown object (or multiple objects) to UF-3.

4. From at least on or about April 17, 2020 to on or about May 27, 2020, ISLAM engaged in patterns of conduct similar to those described above, or engaged in activity consistent with hand-to-hand narcotics transactions during which he retrieved suspected narcotics from inside of the Thunderbird and/or the Mustang. The Government has obtained video surveillance footage of ISLAM engaging in suspected narcotics transactions on more than a dozen dates—oftentimes conducting numerous transactions per day—within the last two months.

5. Based in part on the drug distribution activity described above, law enforcement obtained warrants to search an apartment unit located on

Chadwick Avenue that is associated with ISLAM, as well as the Thunderbird and the Mustang. During the search of the residence, law enforcement recovered, among other items, approximately one hundred and ninety-four (194) vials containing suspected cocaine base. During the search of the Thunderbird, law enforcement recovered, among other items, a 5.7x28 millimeter caliber FN Herstal model "FN Five-SeveN" pistol, bearing serial number 386337711 (the "Firearm"), loaded with seventeen (17) rounds of 5.7x28 millimeter caliber ammunition (the "Ammunition") and approximately sixty-four (64) glassine envelopes containing suspected heroin from inside of a trap.

6. The Firearm and the Ammunition were manufactured outside the State of New Jersey and thus moved in and affected interstate commerce prior to May 30, 2020.

7. On or about July 11, 2008, ISLAM was convicted in the Superior Court of New Jersey, Essex County, of manufacturing, distributing, or dispensing a controlled dangerous substance within 1,000 feet of a school, in violation of N.J.S.A. § 2C:35-7, a crime punishable by a term of imprisonment exceeding one year.

8. On or about July 16, 2010, ISLAM was convicted in the Superior Court of New Jersey, Essex County, of robbery, in violation of N.J.S.A. § 2C:15-1A(1), a crime punishable by a term of imprisonment exceeding one year.