

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND WARRANT

I, Michael Bowman, Special Agent of the Federal Bureau of Investigation (“FBI”), United States Department of Justice, being duly sworn, state as follows:

I. BACKGROUND

1. I am a Special Agent of the FBI and have been so employed since August 2012. I have been assigned to the FBI Philadelphia Division’s South Jersey Violent Offender & Gang Task Force (“SJVOGTF”). Before joining the SJVOGTF, I was assigned to the Philadelphia Violent Gang Task Force (“VGTF”) for approximately three years and was tasked to investigate violent neighborhood-based gangs with international drug connections. The focus of the SJVOGTF is to identify, disrupt, and dismantle existing and emerging violent criminal enterprises, drug trafficking organizations, and street gangs. Prior to my employment as a Special Agent, I worked as an Intelligence Analyst for the FBI in Washington D.C. for approximately four years. As an analyst, I investigated international and national Hispanic-based gangs including “MS-13” and “18 Street” organizations with direct ties to the United States. My responsibilities included the exploitation of telephone communications to advance investigations into known and unknown gang members engaged in acts of violence.

2. I am one of the agents who has been involved in the investigation that is the subject of this Affidavit. I have personally participated in this investigation, and I am aware of the facts contained herein based upon my own participation in the investigation, my discussions with others participating in the investigation, and various other sources of information as set forth herein. I make this Affidavit based on personal knowledge derived from my participation in this investigation and on information I believe to be reliable and accurate, including (but not limited to) information from the following sources:

- a. my training and experience investigating drug trafficking offenses and the training and experience of colleagues with whom I am working on this investigation;
- b. oral and written reports, and documents relating to this investigation that I have

obtained and received from members of the FBI and other law enforcement officers¹;

- c. discussions I have had concerning this investigation with experienced narcotics investigators and other law enforcement officers;
- d. physical surveillance and video surveillance conducted by the FBI and local law enforcement agencies, the results of which have been reported to me either directly or indirectly;
- e. public records;
- f. telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- g. statements of confidential sources (“CSs”)²;
- h. consensually-recorded phone calls or text messages;
- i. controlled purchases of cocaine powder, cocaine base, heroin, and fentanyl, and covert audio and/or video recordings made in connection with these operations;³ and
- j. court-authorized Title III interceptions of wire and electronic communications of various cellular telephones used by suspects in the drug-trafficking organization (“DTO”) described herein. Specifically, over the course of this investigation, court authorization was obtained to intercept wire and/or electronic communications, including GPS location data, over eight (8) different cellular telephones (i.e., “Target Telephones 1, 2, 3, 4, 5, 6, 7, and 8”).⁴

¹ Throughout the course of this investigation, the FBI has made use of the knowledge and experience of various local law enforcement officers, including local Camden police officers, detectives, intelligence officers, New Jersey State Police Troopers and Task Force Officers, who are familiar with the history of drug-trafficking in and around Camden and, in particular, who are familiar with some of the members of the DTO discussed herein. These law enforcement officers have relied on their experience and expertise to confirm the identities of DTO members through voice recognition, well known usage of aliases, Confidential Sources, surveillance activities in conjunction with intercepted communications over cellular telephones, telephone toll records, birthdates, and other sources and methods.

² Over the course of this investigation, law enforcement agents obtained information from seven (7) different CSs. Law enforcement agents believe that the information provided by the CSs, as described herein, is credible and reliable.

³ Over the course of this investigation, law enforcement agents have conducted approximately thirty-one (31) controlled purchases using CSs from many individuals discussed in this affidavit.

⁴ Although law enforcement obtained judicial authority to intercept wire and/or electronic communications over all eight of the Target Telephones, law enforcement did not actually intercept

3. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part. When describing conversations or text messages, unless otherwise noted, I have provided a summary of those communications. When providing transcriptions of conversations, I or another agent have listened to the conversation and provided a substantially verbatim transcript of the conversation, accounting for the fact that the final transcripts of these conversations may contain minor edits for syntax or language, which would not bear on the overall substance or meaning of the conversation. For reference, I have abbreviated the names of speakers in transcribed conversations using initials or other means of identification. In some instances, I have included comments and abbreviations in brackets for clarification (i.e., “U/I” for unintelligible speech; “S/L” for sounds like). In addition, where amounts are set forth in this Affidavit, they are set forth as approximations. Similarly, dates and times are approximations, and should be read as on or about, in or about, or at about the date or time provided.

4. During the course of this investigation, law enforcement agents encountered powder cocaine, heroin, and fentanyl. Where law enforcement encountered suspected powder cocaine, the narcotics were field tested and did test positive for cocaine. Where law enforcement agents encountered suspected heroin/fentanyl, the narcotics were sent to a Drug Enforcement Administration (“DEA”) laboratory for testing and did test positive for heroin/fentanyl.

5. This Affidavit is submitted for the limited purpose of setting forth probable cause for the issuance of the requested complaint and arrest warrant. For that reason, I have not included every fact known to me regarding this investigation. Rather, I have set forth only those facts which I believe are necessary to establish probable cause to support issuance of the requested complaints and arrest warrants.

communications over all the Target Telephones. Specifically, court authorization was obtained to intercept wire and/or electronic communications over Target Telephone 5 but no completed calls or text messages were actually intercepted over the cellular telephone. To the extent that any raw packet data was intercepted on these cellular telephones, such data was sealed in accordance with the required sealing procedures.

6. Starting in or about September, 2018, I and other law enforcement investigators initiated an investigation into the unlawful drug distribution activities of the instant DTO, which operates in and around Camden, New Jersey and is engaged in the illicit distribution of controlled substances, including heroin and fentanyl. Through various investigative measures, I and other members of the investigative team have determined that this DTO controls the distribution of drugs on and around the 300-400 blocks of Beckett Street, 400 block of Royden Street, 300 block of Chestnut Street, 400 block of Walnut Street and the 600 block of Pine Street in Camden, New Jersey. Historically, these areas have been the location of concentrated drug activity and the scenes of shootings and other acts of violence. Moreover, information provided to law enforcement agents by Confidential Informants and Confidential Sources indicates that the DTO has used and continues to use violence to control the distribution of drugs on and around the aforementioned locations in the city of Camden. Additionally, members of the DTO distribute drugs at other locations, in addition to these city blocks, and arrange drug transactions over the telephone.

7. The DTO members work together in a multi-layered organizational structure, with individual DTO members having different roles, responsibilities, and connections within the DTO. Typically, and as described further herein, the higher DTO members supply the lower-level DTO members with drugs for further distribution at or in and around the aforementioned locations. This supply typically is handled in twice-daily drug “shifts,” though practices vary over time. As the drugs are sold or passed downstream within the DTO to drug customers, the resulting drug proceeds are passed back up the DTO hierarchy. DTO members also conduct separate one-on-one drug transactions with individuals outside of the targeted area. Although the DTO members have different roles and responsibilities, the investigation of the DTO reflects that the hierarchical structure of the DTO is not a rigid structure. The DTO members are interconnected in various ways and enjoy open communication channels with one another, such that higher-level DTO members may engage in activities that typically are the jobs of the lower-level DTO

members, and vice-versa.

8. Based on multiple sources of investigation including controlled drug purchases, pole camera surveillance, and information provided by CSs, law enforcement agents learned that the DTO sells, on average, at least 100 bundles of heroin per day. Law enforcement agents learned that each bundle of heroin sold by the DTO in Camden consists of approximately 20 individual packets. The individual packets typically sell for approximately \$5 each, although buyers may be provided with a few extra packets of heroin (at no extra charge) when they buy a certain amount of packets in one transaction. As set forth herein, over the course of the investigation, law enforcement agents have used CSs to conduct multiple controlled purchases of heroin from DTO members. Based on these controlled purchases, law enforcement agents determined that each packet of heroin had an approximate, average net weight of 0.03 grams. Based on the information that each bundle of heroin consists of twenty (20) individual packets, law enforcement agents believe that the net average bundle of heroin weighs approximately 0.6 grams. Accordingly, during heroin sales, at 100 bundles a day, the DTO distributes – on average – approximately 60 grams of heroin per day. Law enforcement agents believe that over a ten month period, relying on the lowest known quantity, the DTO has distributed at least 18,000 grams, or 18 kilograms, of heroin. Using the more conservative number of bundles a day (100 bundles) and the more conservative number of packets in a bundle (20 packets), law enforcement calculates that over the course of a ten month period, the DTO distributed a minimum of over 18,000 grams (i.e., 18 kilograms) of heroin, by net weight.⁵

⁵ As set forth herein, some of the heroin acquired through controlled purchases from DTO members over the course of this investigation also tested positive for the presence of fentanyl.

From various controlled purchases of heroin over the course of this investigation, as well as various arrest reports and other law enforcement reports in the Camden area, I am aware that there have been several overdose incidents in the Camden area involving heroin and/or fentanyl.

Furthermore, I have learned that over the course of this investigation, there were 3 non-fatal overdoses and 2 fatal overdoses in the Camden area where the overdose victims were found with quantities of heroin and/or fentanyl that were packaged with the same “Star Wars” drug stamps described in this Affidavit as the stamps used by the DTO.

9. Based on multiple sources of investigation including controlled drug purchases, pole camera surveillance, and information provided by CSs, law enforcement agents learned that the DTO sells, on average, at least 150 vials of powder cocaine per day. As set forth herein, over the course of the investigation, law enforcement agents have used CSs to conduct multiple controlled purchases of powder cocaine from DTO members. Based on these controlled purchases, law enforcement agents determined that each vial of cocaine had an approximate, average net weight of 0.03 grams. Based on the information that the DTO sold approximately 150 vials per day, law enforcement agents believe that the DTO distributes – on average – one hundred thirty-five (135) grams of powder cocaine per month. Accordingly, law enforcement agents believe that over a ten month period, relying on the lowest known quantity, the DTO has distributed at least 1,350 grams, or 1.35 kilograms, of powder cocaine.

10. During the course of this investigation, law enforcement agents believe that DTO members have conspired to distribute and possess with intent to distribute at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and at least 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

II. PROBABLE CAUSE

a. Hector Lopez

11. During the course of this investigation, law enforcement agents identified Hector Lopez (“Lopez”) as a set worker for the DTO, selling primarily heroin and cocaine. Law enforcement agents have observed Lopez conduct multiple narcotics transactions through physical and electronic surveillance.

Based on these facts, I believe that the DTO has supplied heroin/fentanyl that contributed to multiple drug overdoses, including fatal overdoses, in the Camden area.

Law enforcement agents conducted multiple controlled purchases from Lopez using a CS. In combination with physical and electronic surveillance, law enforcement agents learned that Lopez received narcotics from his shift manager, Ray Santos (“Santos”), and Juan Cabrera (“Cabrera”), a high-level member of the DTO.

12. For example, on or about February 25, 2020, law enforcement agents used a CS to conduct a controlled purchase of narcotics from Lopez. Prior to that date, the CS, at the direction and in the presence of law enforcement agents, sent a text message to Lopez’s known phone number, placing an order for narcotics. Lopez and the CS agreed to a meet time and location on the 300 block of Beckett Street, in Camden, New Jersey. Lopez provided approximately twenty (20) red tinted vials of powder cocaine and twenty (20) packet of heroin, stamped “Star Wars” to the CS in exchange for money. Law enforcement agents observed Lopez enter the property at 311 Beckett Street in order to obtain narcotics. Law enforcement agents learned that 311 Beckett Street was a residential property that belonged to Santos and was a stash location for the DTO.

13. In another example, on or about March 24, 2020, law enforcement agents used a CS to conduct a controlled purchase of narcotics from Lopez. Prior to that date, the CS, in the presence of law enforcement agents, contacted Lopez using his known telephone number and arranged a time and place to meet. Lopez travelled on foot from the 300 block of Beckett Street to the 300 block of Royden Street, met with the CS, and provided approximately forty-nine (49) gray and yellow tinted vials of powder cocaine, and eighty (80) packets of heroin, stamped “Star Wars,” in exchange for money. During the transaction, Lopez told the CS that the vials were a different color than earlier so that, “law enforcement can’t identify what we selling.”

b. Brian Smith

14. During the course of this investigation, law enforcement agents identified Brian Smith,

a/k/a “Mack” (“B-Smith”) as a set worker for the DTO, selling primarily heroin and fentanyl. Law enforcement agents have observed B-Smith conduct multiple narcotics transactions through physical and electronic surveillance. Law enforcement agents conducted multiple controlled purchases from B-Smith using a CS. In combination with physical and electronic surveillance, as well as lawful interceptions of wire communications, law enforcement agents learned that B-Smith had direct ties with a high-level member of the DTO, Franklin Lorenzo-Gonzalez (“Lorenzo-Gonzalez”). During the course of the investigation, law enforcement agents intercepted wire communications over the cellular telephone bearing number (443) XXX-3001 and bearing Electronic Serial Number XXXXXXXXXXXXXXX4036, (hereinafter “Target Telephone 2”), belonging to Lorenzo-Gonzalez.

15. For example, on or about June 6, 2019, law enforcement agents used a CS to conduct a controlled purchase of narcotics from the DTO. The CS, in the presence of law enforcement agents, contacted Lorenzo-Gonzalez over Target Telephone 2, and arranged to purchase heroin. The CS and Lorenzo-Gonzalez agreed on a time and place to meet. When the CS arrived, Lorenzo-Gonzalez arrived with B-Smith. Lorenzo-Gonzalez directed B-Smith to make the actual exchange, which he did, providing twenty (20) grams of heroin in exchange for money.

16. On or about January 6, 2020, law enforcement agents used a CS to conduct a controlled purchase of narcotics from the DTO. The CS, at the direction and in the presence of law enforcement agents, contacted Lorenzo-Gonzalez over Target Telephone 2, and arranged to purchase heroin. In that call, captured by law enforcement agents, the CS asked Lorenzo-Gonzalez if he/she could pass Lorenzo-Gonzalez’s number to an associate in order to purchase narcotics. Lorenzo-Gonzalez replied, “Ima give you my boys number,” and provided a number for B-Smith. The CS agreed to provide Lorenzo-Gonzalez his/her associate’s number to put them in touch with B-Smith. The next day, the CS texted Lorenzo-Gonzalez, “he getting 20 for the \$1400,” which I understand means that the CS was providing the heroin

order, specifically twenty (20) grams in exchange for \$1,400. Lorenzo-Gonzalez replied, “Ok n ima tell mack to,” which I believe meant that he (Lorenzo-Gonzalez) would pass the order to “Mack,” a known alias for B-Smith. On or about January 8, 2020, the CS contacted B-Smith over the phone number provided by Lorenzo-Gonzalez. The CS and B-Smith agreed to meet at a particular time and place, where B-Smith provided the CS with twenty (20) grams of heroin in exchange for \$1,400.

c. Pedro Yera

17. During the course of this investigation, law enforcement agents identified Pedro Yera (“Yera”) as a set worker for the DTO, selling primarily heroin and cocaine. Law enforcement agents have observed Yera conduct multiple narcotics transactions through physical and electronic surveillance. Law enforcement agents have conducted controlled purchases from Yera using a CS. In combination with physical and electronic surveillance, law enforcement agents learned that Yera receives narcotics from Lizzady Melendez (“Melendez”) and other members of the DTO.

18. For example, on or about May 26, 2020, law enforcement agents used a CS to conduct a controlled purchase of narcotics from Yera and another set worker, Christian Rosario (“Rosario”). Prior to the transaction, law enforcement agents observed Yera and Rosario conduct multiple hand to hand sales of narcotics with individuals who approached them on the street. Law enforcement agents also observed Yera and Rosario enter and exit 602 S. 4th Street multiple times while conducting the hand to hand sales. The property at 602 S. 4th Street is one of the DTO’s known stash locations, located between Royden and Beckett Streets, and is also the residence of Melendez. The CS, at the direction of law enforcement agents, approached Yera and Rosario. Yera questioned the CS about other locations where the CS purchased narcotics. I believe Yera questioned the CS in order to confirm that the CS was actually a narcotics user and to confirm for himself that the CS was not, in fact, working with law enforcement agents. Rosario provided the CS with twelve (12) packets of heroin stamped “Body Bag,” and 4 gray tinted vials of powder

cocaine. During the transaction, Yera acted as a lookout, looking up and down the street in an effort to identify the presence of law enforcement agents.

d. Christian Rosario

19. During the course of this investigation, law enforcement agents identified Christian Rosario (“Rosario”) as a set worker for the DTO, selling primarily heroin and cocaine. Law enforcement agents have observed Rosario conduct multiple narcotics transactions through physical and electronic surveillance. Law enforcement agents have conducted controlled purchases from Rosario using a CS. In combination with physical and electronic surveillance, law enforcement agents learned that Rosario receives narcotics from Melendez and other members of the DTO.

20. In one example, on or about May 26, 2020, law enforcement agents used a CS to purchase narcotics from Rosario and Yera. *See supra* para. 18. In another example, on or about March 28, 2020, April 13, 2020, and April 14, 2020, law enforcement agents observed Rosario exit Melendez’s residence at 602 S. 4th Street, and meet multiple individuals in front of the property to conduct hand to hand transactions.

e. Julio Medina

21. During the course of the investigation, law enforcement agents identified Julio Medina a/k/a “Juli” (“Medina”) as a set worker for the DTO. Law enforcement agents have observed Medina conduct multiple narcotics transactions through physical and electronic surveillance. Law enforcement agents conducted multiple controlled purchases from Medina using a CS. Law enforcement agents have observed Medina keep stashes of narcotics in different locations and with various people. For example, Medina has been observed retrieving narcotics from residences including 414 Royden Street and 604 S. 3rd Street. During his drug dealing activities, Medina interacts with other individuals known to be involved in the DTO including Cristal Torres, Jabriel Rosa (hereinafter “Rosa”), Christian Rosario, and

Hector Mendez (hereinafter “Mendez”). During the course of the investigation, law enforcement agents intercepted wire and electronic communications over the cellular telephone bearing number (717) XXX-3731 and IMSI number XXXXXXXXXXXX2836, (hereinafter “Target Telephone 1”), belonging to Medina.

22. For example, on or about December 5, 2019, law enforcement agents used a CS to conduct a controlled purchase of narcotics from the Medina. The CS, at the direction and in the presence of law enforcement agents, contacted Medina over Target Telephone 1, and arranged to purchase heroin. The CS and Medina arranged to meet at specific time and place. When the CS arrived at the pre-arranged location on the 300 block of Royden Street in Camden, New Jersey, Medina informed him/her that he did not have heroin on his person, but would acquire the heroin imminently. Later that day, Medina provided the CS with one hundred-fifty (150) packets of heroin.

23. On or about December 12, 2019, law enforcement agents used a CS to purchase narcotics from Medina. The CS, at the direction and in the presence of law enforcement agents, contacted Medina over Target Telephone 1, and arranged to purchase heroin. The CS and Medina arranged to meet at a specific time and place. The CS met Medina on the 300 block of Royden Street, in Camden, New Jersey. Law enforcement agents saw Medina meet with another male, known to law enforcement agents, and receive narcotics from that male. Medina immediately gave the narcotics, ten (10) grams of heroin, to the CS in exchange for money.

f. Hector Mendez

24. During the course of the investigation, law enforcement agents identified Hector Mendez (“Mendez”) as a set worker and drug packager for the DTO. Law enforcement agents have observed Mendez conduct multiple narcotics transactions through physical and electronic surveillance. Law enforcement agents intercepted Mendez on multiple occasions over Target Telephone 1, where he

discussed and planned narcotics distribution with Medina.

25. For example, on or about December 22, 2019, law enforcement agents intercepted a call between Mendez and Medina over Target Telephone 1 in which Medina tried to ascertain the quality of the heroin that they were selling. Law enforcement agents intercepted and transcribed the following conversation:

MEDINA: Yo
MENDEZ: Yo, bro
MEDINA: Yo, what did they say about it?
MENDEZ: I'm out here right wit it
MEDINA: What did they say about it?
MENDEZ: I don't know, I'm I'm just selling it bro
MEDINA: Alright. I'm bout to pull up.
MENDEZ: Alright, I'm out here right now

26. In this conversation, when Medina asked Mendez, “Yo, what did they say about it?” I believe he meant to understand what Mendez’s buyers thought of the quality of heroin they were selling. Mendez was unable to give him an answer, saying, “I don’t know, I’m I’m just selling it bro.” Mendez, however, was only selling heroin, not making inquiries.

27. In another example, on or about December 23, 2019, law enforcement agents intercepted an outgoing text message from Medina, over Target Telephone 1, to a telephone number that law enforcement agents knew belonged to Mendez. In that text, Medina stated, “yo just gave me the dog food I bang it out.” I know that “dog food” is a street term that refers to heroin. When Medina texted “I bang it out,” I believe Medina was telling Mendez he had already or was about to package the heroin for distribution.

28. On January 2, 2020, law enforcement agents intercepted a series of calls and texts between Mendez and Medina regarding the DTO’s operations on the 400 block of Beckett Street. In summary, Medina complained to Mendez that he (Medina) did not have any drugs to sell and that the area was “dead as hell,” meaning that there were no drug customers on the 400 block of Beckett Street

because there were no drugs to sell. Medina asked for drugs from Mendez because he believed that Mendez was the only person with narcotics on him. Mendez was unable to provide the narcotics immediately because he was not in the area, and directed Medina to contact his (Mendez's) son. Mendez told his son to "give [Medina] thirteen bags of the blue of the dog food...."

g. Miguel Rodriguez

29. During the course of the investigation, law enforcement agents identified Miguel Rodriguez a/k/a "Bebo" ("Rodriguez") as a set worker and manager for the DTO. Law enforcement agents used physical surveillance, information from CSs, and other information to establish Rodriguez's role within the DTO. Additionally, law enforcement agents learned that Rodriguez's brother, Aquilino Lorenzo-Rivera ("Lorenzo-Rivera"), is a high-level member of the DTO.

30. For example, during the first week of September 2019, members of the Camden County Police Department Narcotics and Gang Unit conducted an investigation into open-air sales of heroin in the area of 4th and Mount Vernon Streets in Camden, New Jersey. Over the course of their investigation, law enforcement officers sought and obtained search warrants for several properties and vehicles, authorized by the Honorable Judge Ragonese of the Superior Court of New Jersey.

31. On September 18, 2019, law enforcement officers executed a search warrant at 604 Pine Street in Camden, New Jersey. At the time of the investigation, law enforcement agents knew that Rodriguez lived at that property. Once inside, law enforcement officers recovered seven hundred twelve (712) packets with wax folds stamped, "Dunkin Donuts," containing heroin from the basement of the property. While processing the scene, Lorenzo-Rivera arrived and told law enforcement officers that his mother resided at the location. He was advised that law enforcement officers had a court-authorized search warrant, at which point he initiated a video call with Rodriguez. Law enforcement officers overheard Rodriguez tell Lorenzo-Rivera that he (Rodriguez) planned on turning himself in response to the evidence

recovered from his home. Rodriguez turned himself in on September 24, 2019, and was later released pending trial. Law enforcement agents examined the heroin packets recovered from Rodriguez's home and found it was identical (same size, shape, substance, and "Dunkin Donuts" stamp) to heroin recovered during an August 7, 2019 controlled purchase from Medina that occurred on the 400 block of Royden Street.

32. Additionally, after he was released following the search warrant at his home, Rodriguez was observed along with Lorenzo-Rivera and Angel Rodriguez, a/k/a "Ang" ("A-Rodriguez"), the highest member of this DTO, frequenting A-Rodriguez's residence together, at 554 Washington Street in Camden, New Jersey. During one of those occasions, Lorenzo-Rivera was seen carefully showing Rodriguez a small item concealed in his hand. Law enforcement agents believe that item was a small sample of narcotics.

h. Janet Lorenzo

33. During the course of the investigation, law enforcement agents identified Janet Lorenzo ("Lorenzo") as a facilitator and distributor for the DTO. Law enforcement agents used physical surveillance and lawfully intercepted phone conversations, as well as information from CSs, to establish Lorenzo's role within the DTO. Law enforcement agents learned that Lorenzo was Lorenzo-Rivera's estranged wife, though they maintained on-going communications relating to drug distribution.

34. Law enforcement agents obtained authorization to intercept wire and electronic communications over the cellular telephone bearing number (215) XXX-5128 and IMSI number XXXXXXXXXXXX0867, used by Lorenzo-Rivera (hereinafter "Target Telephone 7"). On March 3, 2020, law enforcement agents intercepted an outgoing call from Target Telephone 7 to a number known to belong to Lorenzo. During that conversation, Lorenzo and Lorenzo-Rivera discussed the status of her drug supply and payments. In that call, Lorenzo asked Lorenzo-Rivera, "I was gonna say, was I supposed

to get anything off the top of that stuff that I was doing?” Lorenzo-Rivera answered, “Yeah,” to which Lorenzo replied, “Okay, I didn’t remember, I couldn’t remember. The same thing you normally give me?” Lorenzo-Rivera answered, “What, 250, right?” I believe Lorenzo was asking Lorenzo-Rivera whether she would be getting \$250 from any profits, as she usually did. Later in same call, Lorenzo-Rivera asked, “you still good on it, thought?” and Lorenzo answered, “Oh, yeah, I got a few, a few more left...I’m gonna be hitting you up soon...because I’m almost done.” I believe Lorenzo told Lorenzo-Rivera that she had a small supply left, and was going to need more controlled substances to sell in the near future.

35. The following day, law enforcement agents intercepted an incoming call over Target Telephone 7 and the same number belonging to Lorenzo that she used the previous day. In that call, Lorenzo told Lorenzo-Rivera that she had a customer who wanted \$1,000 worth of heroin, but she only had \$500 worth left. The following is an excerpt of that conversation:

LORENZO:	Alright I’m about to come now, she wants like a thousand dollars’ worth, she like, “give me all you got,” I told her I only have, um, five hundred dollars’ worth, she like, “give me all that,” and um, so um, give me a lot cuz Imma talk her into getting more cuz she told me to give her whatever I got.
LORENZO-RIVERA:	Ok, got a thousand for you right here.
LORENZO:	Yeah I’m about to come right now.
LORENZO-RIVERA:	Alright bet, that’s what’s up.
LORENZO:	uh huh, and I’ll bring the other money when I come cuz I’m done.
LORENZO-RIVERA:	Come now, come now.

36. In this conversation, I believe Lorenzo referred to one of her customers who wanted more narcotics than Lorenzo could supply. Lorenzo reached out to Lorenzo-Rivera to supply her, and reminded him that she would bring him other money that she owed. During the time of this call, law enforcement agents conducted physical surveillance and observed a vehicle associated with Lorenzo arrive to a garage where Lorenzo-Rivera was located. That garage was located at 1481 Haddon Avenue, in Camden, New

Jersey. Law enforcement agents saw Lorenzo-Rivera enter a parked vehicle in the lot of the location before meeting with Lorenzo. Shortly thereafter, Lorenzo left the area to meet her regular drug customer. During the drive, Lorenzo began driving erratically and disregarding traffic stops and lights. Based on the intercepted communication and physical surveillance, I believe that Lorenzo was conducting counter-surveillance to throw off any possible detection by law enforcement agents.

i. Ray Santos

37. During the course of the investigation, law enforcement agents identified Ray Santos (“Santos”) as a shift manager and a person who stores narcotics for the DTO. Law enforcement agents used physical surveillance, electronic surveillance, information from CSs, and search warrant executions resulting in the recovery of heroin, to establish Santos’ role within the DTO.

38. Santos was observed supplying set workers on the 300 block of Beckett Street with narcotics. On at least three occasions, law enforcement agents conducted controlled purchases from set workers on the block, using a CS. On February 12, 2020, March 4, 2020, and March 24, 2020, law enforcement agents observed Santos provide narcotics directly to DTO set workers including Lopez, who immediately handed the narcotics to a CS in exchange for money.

39. Law enforcement agents also learned that Santos resided at 311 Beckett Street, a known stash house for the DTO. Beginning in June 2019, the Camden County Police Department conducted an investigation that resulted in the authorization and execution of a search warrant at Santos’ residence, authorized by the Honorable Judge Francisco Dominguez of the Superior Court of New Jersey. Once inside, law enforcement officers recovered \$31,180 cash, five hundred ninety-eight (598) packets of heroin stamped “Versace,” twenty-one (21) packets of heroin stamped “Hell Boy,” three hundred seventy-two (372) packets of heroin stamped “Venom,” and one hundred-fifty (150) vials of powder cocaine.

40. Approximately three months after the search at Santos’ residence, law enforcement agents

intercepted wire communications over Target Telephone 1 between Medina and another higher level member of the DTO, Rosa. In those calls, Medina and Rosa discussed preparations and distribution of heroin stamped “Versace.” In the call, Medina said, “Fire, fire, bro, like, they love that shit. I about to wait for this other [U/I] to come, you already know.” I know the term “fire” is a street term that refers to high quality heroin. Rosa asked, “so you want me, so for you, between me and you, you still want to me to keep it as that name, or?” I believe Rosa was asking Medina whether or not to keep the same stamp name on the heroin. Later in the call, Rosa asked Medina, “so you want ‘run,’ that ‘run’ name or you want to stay with that ‘Versace’ cause that would just be you.” Rosa and Medina discussed how to package the high quality heroin, referring to the “Versace” stamp and the fact that it was the stamp they used before.

41. Additionally, during the course of this investigation, law enforcement agents observed members of the DTO, including Medina and others including Manuel Bonilla a/k/a “Peanut” (hereinafter “Bonilla”), and Cabrera, regularly enter and exit Santos’ home on a near daily basis.

42. On October 19, 2019, Camden County Police officers were patrolling the area of the 300 block of Beckett Street when they observed an unknown Hispanic male standing in the rear yard of Santos’ home. Camden County Police Officers saw the male throw a black backpack onto the second floor of 309 Beckett Street, and abandoned property immediately next to Santos’ home. Camden County Police Officers went to the abandoned property and recovered the black backpack. Inside, they recovered the following items: four hundred eighty-eight (488) tinted vials of powder cocaine and 1,500 individual doses of heroin, all contained in glassine packets with a wax paper fold stamped “Star Wars.” This stamp was identical to heroin recovered from a controlled purchase from Lopez on February 25, 2020. During that purchase, Lopez was seen entering Santos’ property prior to the drug sale. *See supra* para 9.

j. Alberto Perez

43. During the course of the investigation, law enforcement agents identified Alberto Perez (“Perez”) as a distributor for the DTO and trusted associated of Lorenzo-Gonzalez. During the course of this investigation, law enforcement agents intercepted multiple drug related conversations between Perez and Lorenzo-Gonzalez over Target Telephone 2.

44. For example, on January 20, 2020, law enforcement agents intercepted a call between Lorenzo-Gonzalez over Target Telephone 2, and Perez, where they discussed how they checked the quality of narcotics Perez purchased from a supplier and that the quality was subpar. The following is a transcript of an excerpt of the call:

LORENZO-GONZALEZ:	Yo bro
PEREZ:	Yo bro
LORENZO-GONZALEZ:	Yea,
PEREZ:	You remember that white shit I had got from June?
LORENZO-GONZALEZ:	Yea
PEREZ:	You ever have that checked out?
LORENZO-GONZALEZ:	I'm not even gonna lie to you, I'm not even gonna say yea because I didn't. All I did was I mixed that shit up with the rest of the shit I had.
PEREZ:	Oh ok
LORENZO-GONZALEZ:	Yea because remember it passed already a week, and then we stopped with the June situation. So I just like, we probably won't even need that.
PEREZ:	Yea, that shit ain't no good bro. The shit we got from um this nigger and shit.
LORENZO-GONZALEZ:	Yea, na, I'm about to head over right now, and then we gonna call him.
PEREZ:	Yea
LORENZO-GONZALEZ:	We just gonna tell him, we gonna tell him, like bro that shit with the zip locked bag, I don't want that shit bro. You gotta give it to us like how you first gave us the first one.

45. In this portion of the call, Perez asked Lorenzo-Gonzalez if he checked the quality of narcotics that Perez purchased. Lorenzo-Gonzalez confessed that he had not, though Perez decided that

it was not of good quality, unlike the first batch he (Perez) purchased from this particular supplier.

46. In a subsequent call, Perez and Lorenzo-Gonzalez discussed paying their source of supply. In summary, they discussed putting money together to purchase twenty-five (25) grams of heroin. In the conversation, Perez reminded Lorenzo-Gonzalez that he (Perez) put out \$1,500 of his own money to buy the drugs since their Mexican source fell through.

47. The next day, Perez and Lorenzo-Gonzalez discussed a new source of supply that Perez considered "fire." In summary, Perez told Lorenzo-Gonzalez that he found someone new with high quality heroin, however because the quality was so good, that supplier would not consign any of the drugs to Perez and Lorenzo-Gonzalez, and it would cost approximately \$55 per gram. Perez also told Lorenzo-Gonzalez that his regular supplier had 4 kilograms of heroin available, but the quality was subpar. Lorenzo-Gonzalez told Perez to contact the new source and purchase from him/her.

48. In another call intercepted between Perez and Lorenzo-Gonzalez, they discussed preparing/cooking narcotics. In summary, Perez called Lorenzo-Gonzalez to learn how much cutting agent he would need to cut, package, and sell thirty-two (32) grams of fentanyl. Lorenzo-Gonzalez calculated an amount of cutting agent in grams to dilute the fentanyl.

49. On January 23, 2020, law enforcement agents intercepted a call over Target Telephone 2 between Lorenzo-Gonzalez and Perez, in which they discussed bringing a handgun to a drug set in Philadelphia that Lorenzo-Gonzalez supplied and Perez managed. The following is a transcript of an excerpt of the call:

LORENZO-GONZALEZ	Yo bro
PEREZ:	Yo bro
LORENZO-GONZALEZ:	Yeah
PEREZ:	You can send Minolo or ManMan, one of those take the ratchet out the car uh meet me 15 bundles at uh, Erie [S/L] and Torresdale and another young boy needs like four of them down the way but I'm a going to try get the truck quick and take it

later, Cabrera entered the stash house, also known as Santos' residence at 311 Beckett Street, before exiting and meeting with Lopez. Moments later, Lopez proceeded to meet the CS and provided the CS forty-nine (49) vials of powder cocaine and eighty (80) packets of heroin in exchange for money. During that time, Bonilla arrived to 311 Beckett Street and met with Cabrera.

54. Law enforcement agents have observed Cabrera and Bonilla interact in ways indicative of drug trafficking management activities. For example, though neither man resided on the block, Bonilla and Cabrera regularly appeared in the early morning hours on the 300 block of Beckett Street prior to the start of business. Law enforcement agents frequently observed Cabrera and Bonilla interacting with set workers, such as Lopez, before, during, and after drug transactions. In another example, on March 27, 2020, law enforcement agents saw Bonilla arrive to the 300 block of Beckett Street in a white Chevrolet Tahoe rental vehicle. Bonilla walked to 311 Beckett Street and met with several individuals, including Santos, before proceeding to 321 Beckett Street. Approximately 2 minutes later, Cabrera walked up from the 400 block of Beckett Street and met with Bonilla in front of 321 Beckett Street. Both men walked across the street into 336 Beckett Street, a locked vacant property. Within 6 minutes, Cabrera and Bonilla exited and Cabrera was seen holding a black plastic bag that he carried into 319 Beckett Street. Bonilla met with Santos in front of Santos' residence while Cabrera remained inside 319 Beckett Street for approximately ten minutes. After approximately ten minutes, Cabrera re-appeared, and was observed quickly accessing a parked vehicle in front of the property. Cabrera and Bonilla entered Bonilla's vehicle, and they left the area. Law enforcement agents have identified 311 Beckett Street, 321 Beckett Street, and 336 Beckett Street as stash locations controlled by the DTO. Based on this surveillance, I believe that Cabrera and Bonilla met to exchange narcotics. When Cabrera and Bonilla went into 336 Beckett Street, I believe Bonilla provided Cabrera with narcotics, which Rosa carried out in a black plastic bag to his stash house at 321 Beckett Street. During the course of this investigation, law enforcement agents have

observed DTO members regularly accessing 311 Beckett Street, 321 Beckett Street, 336 Beckett Street, as well as several other properties on the block, during the course of their day-to-day drug sales. Based on this, as well as other information, I believe that the DTO divides stash locations among these properties in order to mitigate potential loss to robberies and/or law enforcement searches.

l. Jabriel Rosa

55. During the course of the investigation, law enforcement agents identified Rosa as a mid-level drug distributor within the DTO. Law enforcement agents used physical surveillance, electronic surveillance, controlled purchases, and information from CSs to establish Rosa's role within the DTO.

56. Law enforcement agents intercepted Rosa over Target Telephone 1, as well intercepted wire communications over a cellular telephone bearing number (856) XXX-0467 and IMSI number XXXXXXXXXXXX9086 (hereinafter "Target Telephone 3") belonging to Rosa. On November 22, 2019, law enforcement agents intercepted a call between Rosa and Medina over Target Telephone 1 where they discussed their drug supply. In summary, Rosa asked Medina if he (Medina) had any more drugs to sell. Medina told him that he still had four left, meaning four bundles of heroin. Later in the call, Medina and Rosa discussed giving out samples of heroin in order to drum up their business on Beckett Street. They identified a male named "Ralph" who was competing near them by selling heroin.

57. During the course of the investigation, law enforcement agents learned that Rosa not only supplied and sold narcotics on the 300-400 blocks of Beckett Street, but he also supplied larger quantities to be packaged and re-sold. In multiple calls and texts intercepted over Target Telephone 3, Rosa set up deals with multiple unknown males to sell them multiple grams of heroin/fentanyl at a time, typically in 3-gram quantities. Law enforcement agents also learned that Rosa participated in multiple drug sales with his paramour Normali Santiago (hereinafter "Santiago").

m. Normali Santiago

58. During the course of the investigation, law enforcement agents identified Normali Santiago (“Santiago”) as a facilitator and a DTO member who works directly with Rosa. Santiago has been intercepted over Target Telephone 3 conducting narcotics distribution business with another high level member of the DTO, Anderlis Martinez-Espinal (hereinafter “Martinez-Espinal”) on behalf of Rosa. Law enforcement agents also conducted physical surveillance and observed Santiago present during several drug related meetings between Martinez-Espinal and Rosa.

59. For example, on January 23, 2020, law enforcement agents intercepted an outgoing call from Target Telephone 3, used by Rosa and Santiago, to a cellular telephone bearing number (856) XXX-1226, and IMSI number XXXXXXXXXXXX9222 (hereinafter “Target Telephone 4”) belonging to Martinez-Espinal. In the communication, Rosa, Santiago, and Martinez-Espinal all participated in a discussion where Santiago told Martinez-Espinal that she and Rosa were running low on drugs. Specifically, Santiago said, “Look, we have have very few left,” to which Martinez-Espinal answered, “Ahhh, I have his stuff ready now.” Santiago continued, “Look...I would like to give you what we have now, for the time being, so that it won’t ruin the money. You know what I mean?” Later Santiago said, “We have very few left. I would like to give you the money that we have now, so it won’t get lost. You know what I mean?” I believe in that call, Santiago was trying to put money towards additional narcotics ahead of time, so that she and Rosa would not spend/waste their money.

60. In another conversation that same day intercepted over Target Telephone 3 and Target Telephone 4, Santiago told Martinez-Espinal that she and Rosa only had twenty (20) “pants” left to sell. I am aware that “pants” is a street term used to refer to the wax paper folds used to store individual dosages of heroin/fentanyl. In a follow-up call on the same day, Santiago and Martinez-Espinal arrange to meet at a barbershop on Federal Street in Camden, New Jersey. Law enforcement agents conducted physical surveillance of the meet and observed Santiago and Rosa arrive at Martinez-Espinal’s location. Law

enforcement agents saw Martinez-Espinal get into Santiago and Rosa's vehicle and engage in a short conversation.

n. Anderlis Martinez-Espinal

61. During the course of this investigation, law enforcement agents identified Martinez-Espinal as a mid-level drug supplier who provides heroin to members of the DTO. Law enforcement agents used physical surveillance, electronic surveillance, and intercepted wire and electronic communications to establish Martinez-Espinal's role within the DTO.

62. Martinez-Espinal was intercepted multiple times over Target Telephone 3 and Target Telephone 4 arranging to supply heroin/fentanyl to Rosa and Santiago. In another example, on January 25, 2020, law enforcement agents intercepted a string of calls between Martinez-Espinal and Rosa about a quick resupply. Specifically, Rosa asked Martinez-Espinal about getting "candy" because many of his customers were calling demanding it. I understand the term "candy" to be coded language for narcotics, and, in the context of Martinez-Espinal, heroin. Martinez-Espinal told Rosa that he was waiting on his boss, and though the product was ready, he had to wait to speak to his "boss." Martinez-Espinal further explained that his boss was not from the area, and all the drugs were with him. Martinez-Espinal also reminded Rosa that he (Rosa) still owed \$980.

63. The following day, law enforcement agents intercepted another call between Martinez-Espinal and Rosa over Target Telephones 3 and 4. In summary, Martinez-Espinal told Rosa that the "boss" approved selling Rosa 700 grams, and the two arranged to meet at a barbershop on 34th and Federal Street in Camden, New Jersey. Law enforcement agents went to the location for the meet and saw Martinez-Espinal arrive in a vehicle, park, and enter the barbershop. Minutes later, Rosa was seen arriving at the same location and entering the barbershop. After a few minutes, law enforcement agents saw Martinez-Espinal exit the barbershop and walk to his vehicle. Martinez-Espinal entered his vehicle, and

retrieved a small item before returning to the barbershop. Moments later, Rosa texted an unknown buyer, “I’m back!!!!!!,” to which the unknown buyer responded, “Thank you so much. How long is my wait?” Within ten minutes, law enforcement agents intercepted additional texts over Target Telephone 3 between Rosa and the unknown buyer setting up a meet time and location. Based on the surveillance and subsequent communications, I believe that here, Martinez-Espinal told Rosa that he would sell Rosa the 700 grams. I believe that Martinez-Espinal and Rosa met at the barbershop to conduct the exchange, and that it was successful because immediately after, Rosa texted his buyer, telling him that he was able to sell immediately.

64. Martinez-Espinal was also recently the victim of several home invasions where the perpetrators stole either drugs and/or money. For example, on February 16, 2020, law enforcement agents intercepted a communication over Target Telephone 4 between Martinez-Espinal and an unknown male regarding one of the home invasions. During the intercepted communication, Martinez-Espinal described that his residence was ransacked and that how his mother did not know what he was keeping in the house. Martinez-Espinal confirmed they stole “it,” which I believe referred to drugs and/or money, and continued to say that he is going to call the “lil guy” and tell him “if anything happens to him that he will fall responsible for it and that then they will be enemies.” Based on this call, and in the context on this investigation, I believe Martinez-Espinal suspected Rosa in orchestrating the home invasion.

65. In another example, on April 12, 2020, Martinez-Espinal was again a victim of a home invasion robbery at his residence. According to information provided to local law enforcement agents at the time by Martinez-Espinal, three individuals armed with handguns, broke into his residence, pretending to be law enforcement officers. The three individuals held Martinez-Espinal at gunpoint and demanded money. The individuals eventually stole approximately \$500 in cash, a gold necklace, and Martinez-Espinal’s car keys, though they did not take the vehicle. I believe that because Martinez-Espinal had a

relationship with high-level drug suppliers, the perpetrators believed he had a large sum of cash at his home. The perpetrators also believed he might have kept cash in his vehicle because drug transporters often store money and drugs in compartments within their vehicle to protect them from robbers and law enforcement officers.

o. Franklin Lorenzo-Gonzalez

66. During the course of this investigation, law enforcement agents identified Lorenzo-Gonzalez as holding a leadership role within the DTO and a direct associated with A-Rodriguez, the highest-level member of the DTO. Law enforcement agents used physical surveillance, controlled purchases, information from CSs, and intercepted communications to establish Lorenzo-Gonzalez's role within the DTO. Lorenzo-Gonzalez organized and supplied several blocks within Camden, New Jersey, and Philadelphia, Pennsylvania, with narcotics, and distributed larger-scale amounts of narcotics to certain customers. Lorenzo-Gonzalez made regular efforts to obtain new sources of narcotics supplies for the DTO.

67. Lorenzo-Gonzalez was involved in several controlled purchases in conjunction with his associate B-Smith. *See supra* para. 12-13. Lorenzo-Gonzalez was involved in the quality control, cutting, and distribution of heroin, along with Perez, in Camden and in Philadelphia. *See supra* para. 36-42. Lorenzo-Gonzalez also worked with Perez to obtain a new narcotics supply. *See supra* para. 39. On January 23, 2020, law enforcement agents intercepted a communication between Lorenzo-Gonzalez over Target Telephone 2 and Bernardo Carambot a/k/a "Gordo" (hereinafter "Carambot"), another high level member of the DTO. In summary, Lorenzo-Gonzalez told Carambot that he was waiting to get more product and asked Carambot to set aside twenty (20) units of powder cocaine, weighing 3.5 grams each. Carambot assured Lorenzo-Gonzalez that as soon as he got a supply he would give contact Lorenzo-Gonzalez. They negotiated a price of \$200 or \$250 per gram of powder cocaine.

68. In another communication intercepted on January 23, 2020, Lorenzo-Gonzalez discussed the sale of narcotics with another potential supplier, an unknown Mexican male. In summary, the unknown Mexican male told Lorenzo-Gonzalez that the narcotics were already on “this side, you understand me?” meaning the U.S. side of the Mexican-U.S. border.

69. Additionally, between June 6, 2019 and January 8, 2020, law enforcement agents conducted eight separate controlled purchases from Lorenzo-Gonzalez using a CS. In each purchase, the CS purchased at least twenty (20) grams of heroin from Lorenzo-Gonzalez.

p. Bernardo Carambot

70. During the course of this investigation, law enforcement agents identified Bernardo Carambot a/k/a “Gordo” (hereinafter “Carambot”) as being a source of bulk supplies of narcotics to the DTO. Specifically, Carambot supplies bulk quantities of heroin, fentanyl, and cocaine to Lorenzo-Gonzalez, who, in turn, supplies quantities of heroin, fentanyl, and cocaine to other members of the DTO. Law enforcement agents used physical surveillance, information from CSs, and intercepted communications over various telephones to establish Carambot’s role in the DTO.

71. Law enforcement agents intercepted wire and electronic communications over a cellular telephone bearing number (215) XXX-5956, and IMSI number XXXXXXXXXXXX6051 (hereinafter “Target Telephone 6”), belonging to Carambot. In an intercepted communication with Lorenzo-Gonzalez, Carambot and Lorenzo-Gonzalez discussed resupply and price. *See supra* para. 61. In a later follow-up call, law enforcement agents intercepted a call where Carambot, after being assured that he was safe to talk over the line, told Lorenzo-Gonzalez that his friend from Puerto Rico arrived with “the white one.” Based on the context of this investigation, I believe “the white one” is coded language referring to cocaine. Lorenzo-Gonzalez suggested that they take a small amount of cocaine to test its quality. Later in the conversation, Carambot told Lorenzo-Gonzalez that he already sold half the cocaine to his friend, and

offered to put Lorenzo-Gonzalez in contact with his friend.

72. In another call, intercepted over Target Telephones 2 and 6 on January 26, 2020, Carambot acted as an intermediary for Lorenzo-Gonzalez to purchase fentanyl. During the call, the two men discussed the potency of the fentanyl (on a scale of 1 to 10, it was 8-8.5) and negotiated a price.

73. In another example, law enforcement agents intercepted a text and a series of calls on March 3, 2020, between Carambot and Lorenzo-Gonzalez, over Target Telephone 6, where Carambot had sixty-nine (69) grams of heroin/fentanyl to sell to Lorenzo-Gonzalez. Over several calls, Carambot and Lorenzo-Gonzalez arranged to meet at Carambot's grandmother's home, located at 501 Pine Street in Camden, New Jersey. Law enforcement agents attempted to conduct physical surveillance of the meeting, and observed Lorenzo-Gonzalez arrive at the home. Before the meeting could take place, Lorenzo-Gonzalez spotted what he believed was an undercover vehicle, and sped away. In a communication intercepted over Target Telephone 6, Lorenzo-Gonzalez told Carambot the he saw an undercover car with a Pennsylvania license plate. The next day, Lorenzo-Gonzalez told Carambot that he believed he saw another undercover vehicle in the area and suggested that Carambot, like him, change his telephone number. Carambot changed the number for Target Telephone 6 the next day, but because he did not change the IMSI number, law enforcement agents continued to intercept wire and electronic communications over Target Telephone 6.

q. Manuel Bonilla

74. During the course of this investigation, law enforcement agents identified Manuel Bonilla a/k/a "Peanut" (hereinafter "Bonilla") as a high-level member of the DTO responsible for the flow of narcotics to the 300 block and 400 block of Beckett Street. Law enforcement agents used physical surveillance, electronic surveillance, information from CSs, and historical information from other law enforcement agencies to establish Bonilla's role within the DTO.

75. Based on information from CSs, law enforcement agents learned that Bonilla avoids drug conversations over telephones to evade law enforcement tactics. To further evade law enforcement contact, Bonilla is known to carry multiple cellular telephones and constantly change phone numbers. Law enforcement agents, using vehicle trackers and physical observations, saw that Bonilla regularly arrived on the 300 and 400 blocks of Beckett Street in the early morning hours and continuing throughout the day. Bonilla regularly interacts with both higher ranking DTO members as well as set workers on the 300 and 400 blocks of Beckett Street. While on the blocks, Bonilla has been observed going into and out of five different residences at any given time. Law enforcement agents have observed Bonilla regularly conducting counter-surveillance measures after leaving the 300 and 400 blocks of Beckett Street.

76. Law enforcement agents have examined Bonilla's finances and learned that he does not have sufficient sources of legal funds to support his lifestyle. For example, in August 2019, law enforcement agents identified Bonilla's car to be a 2018 Ford Mustang. Bonilla was identified as the sole user of the vehicle. In December 2019, law enforcement agents learned that Bonilla acquired a new vehicle, a 2014 GMC Sierra truck. In March 2020, law enforcement agents learned that Bonilla acquired several other vehicles, and began regularly using rental cars. I understand that Bonilla does not have a sufficient legal source of income to justify the purchase of these vehicles. I also believe that Bonilla changes vehicles often in an effort to avoid law enforcement surveillance.

77. Although Bonilla was not intercepted on the target telephones, he was discussed by other DTO members including Medina and Rosa. For example, on October 31, 2019, law enforcement agents intercepted an incoming communication from an unknown individual to Medina over Target Telephone 1. During the intercepted communication, Medina discussed that his car was burned by someone and that person also stole \$10,000 worth of narcotics from Bonilla and the DTO, as well as two firearms. Medina went on to say that the person who burned his car did so because Medina would not sell him drugs

because under the circumstances that would have been considered disloyal to the DTO. Medina expressed his frustration that, given their business operation, Bonilla did not offer to provide Medina with money for a new car. Specifically, Medina states, “Like come on bro you got all bread you coulda been like here homey two stacks here homey a stack go get your car go get another car bro my bad like that aint got shit to do with you but those n****s they’d a give to them asap like.” Medina believed Bonilla singled him out, saying, “that’s ridiculous my n****a like if that was another n****a I swear to god on my mom bro on my grandma my grandma looking at me right now and said Juli you right doesn’t that n****a U/I here bro come to my crib here take this bread go get you another wheels if it was Bebo and one of those fa****t ass n****s from the other side here go get a new wheels bro no yo what happens though what happens U/I shit sweet U/I they still U/I take this car U/I see how it feels, Blew my day my n****a.” In this conversation, Medina described that Bonilla had all the money but never offered Medina any despite the fact that Medina was loyal to the DTO. Medina identified another set worker, “Bebo,” a/k/a Miguel Rodriguez, that Bonilla would certainly have helped. *See supra* para. 22.

78. In another call, Medina and Rosa discussed how Bonilla was giving other people money while mistreating his own workers. On November 22, 2019, law enforcement agents intercepted a communication over Target Telephone 1 between Medina and Rosa. In the beginning of the call, Medina and Rosa discussed their low drug supplies on Beckett Street. Later, Rosa complained that Bonilla, who he referred to as “nut,” instead of “peanut,” gave \$2,000 to a male to induce that male to become a set worker. The following is a transcribed excerpt:

ROSA: [U/I] riding mother f**kin nuts dick he can suck it
MEDINA: Right yo word is bond bro
ROSA: He better not Ima tell him to you chose him stay on that side n****a
don't say nothing to me you the enemy now n****a
MEDINA: Right that shits crazy cuz I see them talking and shit
ROSA: Yeah nut gave him 2 bands when he first got out you know I know
this shit everybody tell me everything nut gave him 2 bands [U/I]

nut gave him 2 bands then then it was crazy cuz I was calling him and i'm like whats up you ready

MEDINA: Right

ROSA: He was like nut trying to get me to f**k with him I ain't f**king with his hot ass and all this yeah whatever n***a

79. In this call, Rosa told Medina that Bonilla gave 2 bands,⁶ or \$2,000, to a man who was not sure if he wanted to work with Bonilla.

80. I believe that Bonilla limits his contact with narcotics to avoid detection by law enforcement. Instead, Bonilla has lower level members, such as Santos and Lopez, perform regular DTO duties. For example, on or about February 18, 2020, law enforcement agents conducted a controlled purchase from the 300 block of Beckett Street using a CS. The CS purchased sixty-five (65) packets of heroin from Lopez. Lopez was observed meeting with Bonilla and Cabrera just prior to the sale. Immediately following the sale, Lopez returned to Bonilla. I believe Lopez turned over the money from the sale with the CS to Bonilla, which is the typical practice between set workers and their managers. Based on my training and experience, I believe that Lopez was working as a set worker, providing drugs to individuals along the 300 block of Beckett Street, while Bonilla and Cabrera oversaw the daily activities.

r. Angel Rodriguez

81. During the course of this investigation, law enforcement agents identified Angel Rodriguez a/k/a “Ang” (hereinafter “A-Rodriguez”) as holding the highest leadership role within the DTO. Specifically, A-Rodriguez is the primary source of drug supply to lower-ranking members of the DTO and facilitates the movement of drugs and proceeds from drug transactions through a closely knit network of co-conspirators. Law enforcement agents used physical surveillance, information from CSs, and

⁶ I know that a “band” refers to \$1,000 cash.

intercepted communications to establish A-Rodriguez's role in the DTO.

82. For example, on September 27, 2019, law enforcement agents intercepted a communication between A-Rodriguez and Lamar Maye, a/k/a "Karate Joe" (hereinafter "Maye") a high-ranking member of the DTO. At the time of the communication, Maye was in custody in the State of New Jersey, and the call was recorded using a New Jersey Department of Corrections telephone number and a cellular telephone number belonging to A-Rodriguez.⁷ During the conversation, A-Rodriguez told Maye about a large financial loss he suffered after another member of the DTO was arrested. The following is a transcribed excerpt:

RODRIGUEZ: Man I'm already, I'm already, I'm already, man this shits crazy out here bruh.
MAYE: I don't need no headaches there and n***a if you already feel like that then you better mother f**king uh regroup, f**k wrong with you n***a, you think you be f**ked up when I get home, crazy?
RODRIGUEZ: I'm already, that shit, I'm f**ked up as is, bruh, they just took, I lost twelve (12) bands
MAYE: Yeah...?
RODRIGUEZ: Yup
MAYE: Oh, well you gotta sit the f**k down and cool out.
RODRIGUEZ: I got, I, I owe these mother f**kers like thirty (30) right now.
MAYE: You gotta cool out dog. You know sometimes you got, man you know we been through that shit before.

83. For context, approximately two days prior, Lorenzo-Rivera, see supra para. 24-25, 27-29, was arrested by members of the FBI operating out of West Virginia. Those agents conducted an investigation of Shaquan Richardson, a suspected drug dealer who was known to sell in the area near Martinsburg, West Virginia. There, law enforcement agents investigated a drug delivery by Lorenzo-

⁷ At the time of this call, law enforcement agents had not begun wire and electronic interceptions over A-Rodriguez's number, though later that number was intercepted.

Rivera where he also picked up a \$12,000 payment from Richardson that was intended to go to A-Rodriguez. Law enforcement agents conducted a motor vehicle stop and recovered \$12,000 from Lorenzo-Rivera. Law enforcement agents later executed a search and seizure warrant related to the Martinsburg, West Virginia drop location and recovered, amongst other things, approximately 250 grams of heroin, which is consistent in value with the \$12,000 payment. In the call between A-Rodriguez and Maye two days later, A-Rodriguez told Maye that he lost twelve (12) bands, referring to the \$12,000 taken from Lorenzo-Rivera. A-Rodriguez continued to lament that because of the seizure, he owed \$30,000. Later in the call, A-Rodriguez discussed that his mother's home was raided by police. The following is a transcribed excerpt:

RODRIGUEZ: [U/I] it's hot as hell out here with n***as, they picked up Bebo, when they picked up Bebo, they let Bebo out the next day bro, this n***a come around talking [overlapping voices] yeah remember I told you they ran down his moms house.

MAYE: yeah, yeah

RODRIGUEZ: yeah they ran down his mom house he caught a charge, they ran down, he turned himself in, they let him out the next day right...

MAYE: yeah...

RODRIGUEZ: When he come around here, he just trying to talk too much

MAYE: Man stay the f**k away from that n***a bro.

84. In this call, A-Rodriguez referred to a search warrant execution on September 18, 2019, at 604 Pine Street in Camden, New Jersey. *See supra* para. 24.

85. In another example, on January 3, 2020, law enforcement agents intercepted a communication over a cellular telephone bearing number (609) XXX-0830 and IMSI number XXXXXXXXXXXX2675 (hereinafter "Target Telephone 8"), belonging to A-Rodriguez, between A-Rodriguez and Maye. In summary, A-Rodriguez described a shooting incident that occurred on his drug territory near 6th and Pine Streets in Camden, New Jersey. A-Rodriguez told Maye that rival drug dealers

shot his friend. The day before, Camden County Police Officers responded to the intersection of 6th and Pine Streets, for a shooting, and discovered a victim, later identified as Joshua Beatty, suffering a gunshot wound to the head. A-Rodriguez explained that since the death, he would need to replace Beatty. A-Rodriguez stated, “yeah...shit was looking like...back then., that’s why, n***s mad,” referring to the past when his drug set at 6th and Pine was doing substantially better business than other drug sets in that area. Maye asked if A-Rodriguez had any idea the shooting was going to happen. A-Rodriguez told Maye that the victim, Joshua Beatty, described an earlier encounter with rival drug dealers who forbade anyone from selling on that corner. A-Rodriguez told Maye that he gave no credence to the rival drug dealers. He also said that while he was at a Speedway, by coincidence, he was warned by someone he knew to stay away from that drug set on Pine Street.

86. On January 7, 2020, law enforcement agents intercepted another recording between A-Rodriguez and Maye, who was using a New Jersey Department of Corrections number. In summary, A-Rodriguez and Maye discussed the recent arrest of Lorenzo-Rivera by Camden County Police Officers, and its impact on the DTO. Specifically, A-Rodriguez told Maye that though Lorenzo-Rivera was arrested, he did not believe Lorenzo-Rivera was working with any law enforcement authorities. A-Rodriguez believed that someone gave information leading to Lorenzo-Rodriguez’s arrest, though he did not know who. Later in the call, A-Rodriguez expressed concern that he was in trouble. Specifically, he said, “I don’t know what to do, where to go... It ain’t that, you gotta understand that I, I, I done, I done, I done mother f**king placed orders, and I can’t be, huh I can’t do this.” I believe A-Rodriguez meant that he had already placed drug orders that he had to pay for but was now found himself in a difficult situation.

III. SEALING

87. Because this application and Affidavit pertain to an ongoing criminal investigation, and because disclosure of the information contained herein as well a disclosure of the complaints and warrants

being requested may compromise the investigation and increase the risk of harm for law enforcement officers who are responsible for conducting the searches, I request that this Affidavit, the criminal complaints, the arrest warrants, and all related documents be filed under seal until further order of the Court, except for a copy of the arrest warrants to be served at the time of execution.

IV. CONCLUSION

88. Wherefore, I submit that there is probable cause to believe that the members of the conspiracy described above, from in or about September 2018 to May 2020, in Camden County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine (“powder cocaine”), a Schedule II controlled substance; at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and in violation of Title 21, United States Code, Section 846.

Pursuant to F.R.Crim.P. 4.1, Special Agent Bowman was sworn and attested to the contents of this affidavit in support of the complaints.

HON. KAREN M. WILLIAMS
United States Magistrate Judge

Date: _____