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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

v.

SHAMIR R. WILLIAMS and  
NYSIFAH DEAVEAREAUX

**CRIMINAL COMPLAINT**

Mag. No. 20-8322 (JAD)


I, Michael C. Coppolo, 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 United States Drug Enforcement Administration, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof.

 10:48 08/14/2020  
Special Agent Michael C. Coppolo  
U.S. Drug Enforcement Administration

Special Agent Coppolo attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on August 14, 2020 in New Jersey.

Honorable Joseph A. Dickson  
United States Magistrate Judge

 10:48 08/14/2020  
Signature of Judicial Officer

**ATTACHMENT A**

From in or around May 2020 through on or about August 13, 2020, in the District of New Jersey, the District of Vermont, and elsewhere, defendants

SHAMIR R. WILLIAMS and  
NYSIFAH DEAVEAREUX

did knowingly and intentionally conspire with each other and others to distribute and possess with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 40 grams or more or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

## **ATTACHMENT B**

I, Michael C. Coppolo, am a Special Agent with the United States Drug Enforcement Administration ("DEA"). 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 other items of evidence. 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 statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement has been investigating a drug trafficking organization ("DTO") operating in New Jersey and elsewhere. This DTO distributes controlled substances, to include heroin, which has been packaged into "bricks," with each brick comprised of approximately 50 glassines containing controlled substances.<sup>1</sup> Law enforcement has determined that Paterson, New Jersey residents Shamir R. Williams ("Williams") and Nysifah Deaveareaux ("Deaveareaux") (collectively, the "Defendants") are members and associates of the DTO.

2. In particular, pursuant to the investigation, which included lawfully intercepted communications, law enforcement learned that the Defendants had agreed to sell bricks of controlled substances to another individual ("Individual 1"). For example, in early June 2020, Williams agreed to distribute approximately 250 bricks, or approximately 12,500 individual glassines of heroin, to Individual 1. During certain lawfully intercepted communications, Williams explained, in sum and in substance, that he would send a runner, later identified as Deaveareaux, to deliver the heroin to Individual 1 at an agreed-upon location in the District of Vermont ("Location 1").

3. On or about June 11, 2020, law enforcement surveilled Deaveareaux as she drove a Dodge Charger (the "Charger") from Paterson, New Jersey to the border separating New York from New Jersey. Later that day, agents surveilled Deaveareaux as she drove the Charger towards Location 1. The investigation has revealed that Deaveareaux provided Individual 1 with approximately 12,500 glassines of powdery substance in exchange for what

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<sup>1</sup> Based on my training and experience, I know that bricks distributed in and around Paterson, New Jersey typically contain between a half-gram and a gram of controlled substances.

was purported to be approximately \$28,000 (the "Payment"). Based on investigators' training and experience, the appearance of the substance, and the manner in which it was packaged, investigators believed that the glassines contained opioids, to wit, heroin and/or fentanyl. A field test later confirmed the presence of heroin.

4. Later that day, during a lawful stop of the Charger, investigators recovered the Payment. Further, a review of call detail records reveals communications between Deaveareaux, Williams, and Individual 1.

5. In or around August, 2020, Williams agreed to distribute approximately 250 bricks, or approximately 12,500, individual glassines, of heroin to Individual 1. During certain lawfully intercepted communications, Williams explained, in sum and in substance, that he would send a runner, later identified as Caron J. Abrams ("Abrams"),<sup>2</sup> from the District of New Jersey to deliver the heroin to Individual 1 at an agreed-upon location in Passaic County, New Jersey ("Location 2").

6. On or about August 13, 2020, law enforcement surveilling Location 2 observed Abrams walking toward Individual 1, carrying a bag. Law enforcement detained Abrams and recovered the bag, which contained approximately 197 bricks, or approximately 9,850 glassines, of a light-colored powdery substance. Based on the investigators' training and experience, the appearance of the substance, and the manner in which it was packaged, they believed the substance contained opioids, to wit, heroin and/or fentanyl. A field test later confirmed the presence of both heroin and fentanyl.

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<sup>2</sup> Abrams has been charged by Complaint with possession of fentanyl with the intent to distribute, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B). See Mag. No. 20-8321 (JAD).