## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	: CRIMINAL COMPLAINT
v.	: CRIMINAL COMPLAIN I
CARON J. ABRAMS	: Mag. No. 20-8321 (JAD) :
I, Michael C. Coppolo, being correct to the best of my knowledge	duly sworn, state the following is true and and belief:
SEE AT	TTACHMENT A
	ent with the United States Drug Enforcement laint is based on the following facts:
SEE A	ТТАСНМЕНТ В
Continued on the attached page and	d made a part hereof.
	Special Agent Michael C. Coppolo U.S. Drug Enforcement Administration
1	nis Complaint by telephone pursuant to 4.1(b)(2)(A) on August 14, 2020 in New
Honorable Joseph A. Dickson	
United States Magistrate Judge	Signature of Judicial Officer

## **ATTACHMENT A**

On or about August 13, 2020, in Passaic County, New Jersey, defendant

## CARON J. ABRAMS

did knowingly and intentionally possess with intent to distribute 40 grams 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.

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

## 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. Pursuant to that investigation, law enforcement has determined that Caron J. Abrams ("Abrams") is a member and associate of the DTO.
- 2. On or about August 13, 2020, law enforcement learned that the DTO was planning to distribute bricks of heroin to another individual ("Individual 1") at a location in Paterson, New Jersey (the "Location"). That same day, law enforcement surveilling the Location 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 my training and experience, the appearance of the substance, and the manner in which it was packaged, I believed the substance contained opioids, to wit, heroin and/or fentanyl. A field test later confirmed the presence of both heroin and fentanyl.
- 3. After being advised of his <u>Miranda</u> rights, Abrams admitted that the bag contained "bricks." Additionally, based on the facts learned during the investigation, together with the manner in which the controlled substances were packaged and the sheer volume of the controlled substances, I believe that Abrams intended to distribute the aforementioned approximately 9,850 glassines.

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