

UNITED STATES DISTRICT COURT  
for the  
District of New Jersey

United States of America )  
v. )  
TYQUAN BURRELL ) Case No.  
 ) 20-mj-4010 (JS)  
 )  
 )  
 )  
 )

*Defendant(s)*

## CRIMINAL COMPLAINT

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

On or about the date(s) of October 1, 2020 in the county of Camden in the  
District of New Jersey, the defendant(s) violated:

### *Code Section*

### *Description of Offenses*

Title 21, USC § 841(a)(1) and (b)(1)(A); Title 18 USC § 924(c)(1)(A); Title 18 USC § 2. Possession with Intent to Distribute Fentanyl; Possession of a Firearm in Furtherance of a Drug Trafficking Crime; aiding and abetting. See Attachment A.

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

William Pullen

*Complainant's signature*

Special Agent William H. Pullen, HSI

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means).

Date: 10/01/2020

City and state: District of New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

*Printed name and title*

CONTENTS APPROVED  
UNITED STATES ATTORNEY

By:   
Daniel A. Friedman  
Assistant U.S. Attorney

Date: October 1, 2020

**ATTACHMENT A**

**COUNT ONE**  
**(Possession with Intent to Distribute Fentanyl)**

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

TYQUAN BURRELL

did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenylN-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(l) and (b)(l)(B) and Title 18, United States Code, Section 2.

**COUNT TWO**  
**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

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

TYQUAN BURRELL,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B) charged in Count One of this Complaint, did knowingly possess a firearm, namely a Taurus PT 24/7 Pro handgun bearing serial number SYL71652.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

**ATTACHMENT B**

1. I, William H. Pullen, am employed as a Special Agent with the Office of Investigations, Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (HSI) and have been so employed for approximately seventeen years. I am presently assigned to the Cherry Hill, New Jersey field office, which investigates, among other things, narcotics smuggling and distribution cases in violation of Title 21 of the United States Code. I am cross designated to investigate and enforce narcotics violations under Title 21 of the United States Code. I have received training and have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer crimes, intellectual property and other computer-based crimes, computer evidence identification, computer evidence seizure and processing, and various other criminal laws and procedures. I have personally participated in the execution of search warrants involving the search and seizure of narcotics trafficking and distribution cases. I have a Bachelors’ Degree in Criminal Justice from Monmouth University and I am also a graduate of the Federal Law Enforcement Training Center’s Criminal Investigator Training Program, as well as the Immigration and Customs Enforcement Special Agent Training Academy.

2. 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 items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for the limited purpose of establishing probable cause to support the issuance of an arrest warrant and complaint, 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.

3. On approximately six occasions between on or about August 23, 2020 and on or about September 25, 2020, law enforcement officers from HSI, the Camden County Prosecutor's Office, Drug Enforcement Administration HIDTA, and Gloucester Township Police Department observed TYQUAN BURRELL engaging in the sale of controlled substances. Specifically, on three occasions, law enforcement observed TYQUAN BURRELL leave his residence of 590 Lower Landing Rd., Apt. 104, Blackwood, NJ, and drive in a White 2015 Ram 1500 bearing NJ registration X58MMA, to a location where he sold controlled substances.

4. On one occasion, law enforcement observed TYQUAN BURRELL leave his residence of 590 Lower Landing Rd., Apt. 104, Blackwood, NJ, enter the White 2015 Ram 1500 bearing NJ registration X58MMA, where he appeared to remove something, and then enter and drive a black Dodge Charger bearing NJ registration P40MLS, to a location where he sold controlled substances.

5. The controlled substances that TYQUAN BURRELL in the above-described transactions were obtained and tested by the Camden County Prosecutor's Office using the NARK Test Reagent Kit and were found to be positive for fentanyl<sup>1</sup> and/or heroin.

6. Based on this information, on September 30, 2020, Judge David M. Ragonese, Superior Court, Camden County, authorized the issuance of three search warrants for TYQUAN BURRELL's residence of 590 Lower Landing Rd., Apt. 104, Blackwood, NJ, the White 2015 Ram 1500 bearing NJ registration X58MMA, and the black Dodge Charger bearing NJ registration P40MLS.

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<sup>1</sup> Based on my training and experience, I know that fentanyl is also known by its chemical compound, N-phenylN-[1-(2-phenylethyl)-4-piperidinyl] propanamide.

7. On October 1, 2020, law enforcement observed TYQUAN BURRELL leave his residence and drive the White 2015 Ram 1500 bearing NJ registration X58MMA to Cooper River Park in Camden County, New Jersey. Having probable cause to arrest TYQUAN BURRELL for possession and distribution of controlled substances, law enforcement removed TYQUAN BURRELL from his vehicle and placed him under arrest. In a search incident to arrest, law enforcement located a bulge near TYQUAN BURRELL's groin and uncovered approximately 30 bundles of a total of approximately 418 blue wax baggies, each containing a white powder. A later test of a sample of the substance contained within the baggies using a TruNarc Handheld Narcotics Analyzer was positive for fentanyl.

8. Subsequently on October 1, 2020, law enforcement executed the search warrant on TYQUAN BURRELL's residence of 590 Lower Landing Rd., Apt. 104, Blackwood, NJ. In a safe in the master bedroom, law enforcement found three sandwich-sized plastic bags, each bearing the text "100," containing a white powder. Law enforcement also found approximately 180 bundles of a total of approximately 2,521 blue wax baggies, each containing a white powder, and approximately \$34,000 in U.S. currency. Law enforcement used a TruNarc Handheld Narcotics Analyzer to test the substance in each of the sandwich-sized bags, and in a sample of the approximately 2,521 baggies, and the tests were positive for fentanyl. A measurement indicated that the total weight of the sandwich-sized bags containing fentanyl is approximately 324 grams.

9. In a drawer in a nightstand in the master bedroom, law enforcement located a loaded Taurus PT 24/7 Pro handgun bearing serial number SYL71652. In the bedroom, law enforcement also located a pay stub bearing TYQUAN BURRELL's name, money orders made payable to TYQUAN BURRELL, and a piece of mail addressed to TYQUAN BURRELL.

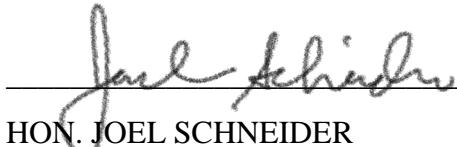
10. On October 1, 2020, an adult female stated to law enforcement that she, her three minor children, and TYQUAN BURRELL reside at 590 Lower Landing Rd., Apt. 104, Blackwood, NJ approximately 3-4 nights per week. She further stated, in substance and in part, that TYQUAN BURRELL is the only individual with access to the safe. She also disclaimed knowledge or ownership of the firearm that was found in the bedroom.

Respectfully submitted,

*William Pullen*

William H. Pullen  
Special Agent, Homeland Security Investigations

Pursuant to Fed. R. Crim. P. 4.1, Special Agent William H. Pullen was sworn and attested to the contents of this affidavit in support of the issuance of an arrest warrant and criminal complaint charging defendant TYQUAN BURRELL with Possession with Intent to Distribute Fentanyl and Possession of a Firearm During and in Relation to a Drug Trafficking Crime, as set forth in Attachment A.

  
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HON. JOEL SCHNEIDER  
United States Magistrate Judge

Date: October 1<sup>st</sup>, 2020