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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Michael A. Hammer  
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 : Mag. No. 20-10362  
 MICHAEL SHELLI :  
 :  
 :

I, Kenneth Wasley, 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 Drug Enforcement Administration ("DEA") and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

s/ SA Kenneth Wasley

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Kenneth Wasley, Special Agent  
DEA

Sworn to and subscribed to me telephonically pursuant to F.R.C.P. 4.1(b)(2)(A),  
October 15, 2020, Essex County, New Jersey

Honorable Michael A. Hammer  
United States Magistrate Judge

s/ The Hon. Michael A. Hammer  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Distribute Cocaine)

From in or around January 2010 through in or around March 2020, in the District of New Jersey and elsewhere, the defendant,

**MICHAEL SHELLI,**

did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

## **ATTACHMENT B**

I, Kenneth Wasley, am a Special Agent with the Drug Enforcement Administration. 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. Since in or around March 2020, members of the Drug Enforcement Administration ("DEA"), have been conducting an investigation of a drug trafficking organization ("DTO") operating in New Jersey and elsewhere. To date, the investigation has included such investigative techniques as lawfully recorded conversations, electronic and physical surveillance, lawful searches, and at least one cooperating source.

2. Based on this ongoing investigation, in or around April 2020, law enforcement identified a residence in Saddle Brook, New Jersey, as a location in which members of the DTO were dealing cocaine from (the "Stash House"). During the course of this investigation, law enforcement determined that narcotics purchasers from the tristate area purchased cocaine from the Stash House.

3. During the course of this investigation, a cooperating witness ("CW-1") confirmed that he/she had been supplying cocaine from the Stash House to a co-conspirator. CW-1 stated that he/she knew that this co-conspirator was driving up to the Albany, New York area ("Albany") in order to supply the cocaine to Michael SHELLI ("SHELLI") for further distribution.

4. CW-1 stated that he/she had been supplying SHELLI approximately once a month since 2010 until March 2020. CW-1 stated that he/she had sold SHELLI over 5 kilograms of cocaine that SHELLI then distributed in and around Albany. Law enforcement has been able to independently confirm that SHELLI regularly sold cocaine to several individuals in Albany over the course of the past several years. CW-1 stopped supplying SHELLI cocaine in and around March 2020.