

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

JOSEPH C. LONG

Case No.

20-mj-4012 (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 January 15, 2020 in the county of Camden in the District of New Jersey, the defendant(s) violated:

Table with 2 columns: Code Section, Description of Offenses. Row 1: Two counts of 21 U.S.C. Sections 841(a)(1) and (b)(1)(C); See Attachment A

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

Ryan Bell

Complainant's signature

S/A Ryan Bell, ATF

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: 11/02/2020

Joel Schneider

Judge's signature

City and state: District of New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

A handwritten signature in blue ink, appearing to read "K.M. Harberg", with a large, stylized flourish at the end.

By:

KRISTEN M. HARBERG, AUSA

Date: October 30, 2020

ATTACHMENT A

Count One

On or about January 15, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

JOSEPH C. LONG,

did knowingly and intentionally distribute, and possess with intent to distribute, a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

Count Two

On or about January 15, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

JOSEPH C. LONG,

did knowingly and intentionally distribute, and possess with intent to distribute, a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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

ATTACHMENT B

I, Special Agent Ryan Bell, the Affiant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

1. I am a Special Agent with the Federal Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”).
2. I am aware of the facts contained in this Affidavit based upon my own investigation as well as information provided to me by other agents, law enforcement officers, and witnesses.
3. Because this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a Criminal Complaint, I have not included each and every fact known by the Government concerning this investigation. Rather, I have summarized sufficient facts to establish probable cause.
4. From November 2019 through January 2020, I, along with other officers from multiple federal and state law enforcement agencies, conducted a two-month drug trafficking investigation of JOSEPH LONG (hereinafter “Long”), which included controlled drug buys by confidential informants, physical surveillance, and the installation of a GPS tracker Long’s vehicle. The investigation revealed that Long lived with his girlfriend, Teresa Finey (hereinafter “Finey”), at 1020 Kings Highway, Apartment 156, Bellmawr, New Jersey, and that he supplied several drug sets in Camden with drugs that he appeared to be storing in his residence. On January 9, 2020, the Honorable Thomas J. Shusted, Jr., a Judge of the New Jersey Superior Court, approved a “no knock” search warrant for the residence located at 1020 Kings Highway, Apartment 156, Bellmawr, New Jersey.

5. On January 15, 2020, at approximately 6:00 am, the search warrant was executed. As the entry team breached the front door, the perimeter team that was positioned in the back yard saw Long jump out of the second-floor bedroom window. Officers immediately took custody of Long and placed him inside a patrol car. Officers found Finey and 10-month old J.L. in the bedroom.
6. From the kitchen, officers seized one Kool Aid container with a hidden bottom compartment that contained one large plastic bag of suspected cocaine and Mannite Cicogna¹; one Maxwell House container with a hidden bottom compartment that contained three smaller plastic bags of suspected cocaine; and 13 boxes of wax folds that were laser printed with dollar signs. From the dining room area, officers seized a box of approximately 40 small plastic jars with purple lids; an Ugg shoe box that contained sifters that were covered with white powder residue, wax folds that were laser printed with dollar signs, and small plastic bags; a black plastic bag that contained an electric grinder and a sifter that were covered with white powder residue; a black plastic bag that contained small plastic bags and rubber bands; a digital scale; and a black plastic ammunition case that contained approximately 50 shotgun rounds. From the bedroom, officers seized \$3,475 cash that was packaged in four rubber-banded bundles, and several pieces of mail addressed to Long.
7. A field test of the suspected cocaine was conducted, and it tested positive for the presence of cocaine.

¹ Based on my training and experience, I am aware that Mannite Cicogna, a sugarless sweetener, is used by drug dealers as a “cutting” agent to increase the weight of drugs and to create more product for sale.

8. Long and Finey were transported to the Camden County Prosecutor's Office, and I, along with Detective Thomas McDonnell, of the Camden County Prosecutor's Office, interviewed them. Detective McDonnell advised Finey of her Miranda rights, and she asserted her right to silence and declined to give a statement. Detective McDonnell advised Long of his Miranda rights, and he waived his rights and agreed to give a statement. Detective McDonnell informed Long that officers had executed a drug search warrant at his home and seized a large quantity of cocaine, drug packaging and manufacturing materials, and cash. Long stated that Finey was not involved. Detective McDonnell asked Long if he was taking responsibility as the owner of the drugs, and Long replied affirmatively, and reiterated that Finey was not involved. Thereafter, Long stated that he was invoking his right to silence and the interview was terminated. This interview occurred in a room that was equipped with audio and video recording equipment, but due to a technical difficulty, the audio-recording failed, and only the video was captured. However, I was personally present and I personally heard Long state that the drugs seized from his home belonged to him.
9. Long was charged on a State Complaint with first degree possession with intent to distribute cocaine and related charges. On January 31, 2020, the Honorable Kathleen M. Delaney, a Judge of the New Jersey Superior Court, conducted a bail hearing and ordered Long detained without bail pending trial.
10. On April 22, 2020, Judge Delaney conducted a bail review motion. At that time, Long's attorney submitted a transcript of a statement that Tyreek Watkins (hereinafter "Watkins") gave to a defense investigator on February 6, 2020. In that statement, Watkins said that on January 15, 2020, Long and Finey lived at 1020 Kings Highway,

Apartment 156, in Bellmawr, New Jersey, and that he had been staying with them at the apartment from January 12th through 14th. Watkins said that the drugs in the Maxwell and Kool Aid “stash cans” belonged to him. He stated that he put them in the kitchen cabinet, and that Long and Finey had no knowledge of their presence in their home. After conducting the bail review hearing, including a consideration of the Watkins’ statement, Judge Delaney denied Long’s application for release, and ordered him detained without bail pending trial.

11. A subsequent analysis by the Drug Enforcement Administration Laboratory reflected that the items seized from 1020 Kings Highway, Apartment 156, Bellmawr, New Jersey, consisted of:

- a. 177.785 grams of powder cocaine; and
- b. 15.058 grams of crack cocaine.