

ATTACHMENT A

COUNT ONE

(Retaliating Against a Witness/Informant)

On or about April 7, 2021, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

KAITLYN R. POWERS,

did knowingly engage in conduct and thereby threaten to cause bodily injury to another person, namely, a confidential source, with the intent to retaliate against the confidential source for information relating to the commission of a federal offense given by the confidential source to a law enforcement officer, in violation of Title 18, United States Code, Section 1513(b)(2).

COUNT TWO
(Tampering with a Witness/Informant)

On or about April 7, 2021, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

KAITLYN R. POWERS,

did knowingly use the threat of physical force against another person, namely, a confidential source, with the intent to hinder, delay, and prevent the communication of information to a law enforcement officer or judge of the United States relating to the commission of a federal offense, namely, distribution of a controlled substance, in violation of Title 18, United States Code, Section 1512(a)(2)(C).

COUNT THREE
(Retaliating Against a Witness/Informant)

On or about April 9, 2021, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

KAITLYN R. POWERS,

did knowingly engage in conduct and thereby threaten to cause bodily injury to another person, namely, a confidential source, with the intent to retaliate against the confidential source for information relating to the commission of a federal offense given by the confidential source to a law enforcement officer, in violation of Title 18, United States Code, Section 1513(b)(2).

ATTACHMENT B

I, Matthew Amendola, am a Special Agent with the Federal Bureau of Investigation (“FBI”). 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. 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.

Background

1. Since in or around October 2020, law enforcement has conducted an investigation into unlawful drug-trafficking activities by Richard N. Edwards, Jr. (“Edwards”) and others. The investigation included multiple controlled purchases of narcotics, including suspected crack cocaine and suspected heroin, from Edwards by a confidential source (“CS”) working at the direction and under the supervision of law enforcement. During one of those controlled purchases, defendant KAITLYN R. POWERS (“POWERS”) distributed suspected narcotics to the CS after the CS made arrangements to purchase the suspected narcotics from Edwards. In addition, on multiple occasions between January 2021 and March 2021, Edwards obtained suspected narcotics from Jamil J. Yasin (“Yasin”), and then redistributed portions of the suspected narcotics to the CS.

2. For instance, on or about February 24, 2021, the CS, acting at the direction and supervision of law enforcement, contacted Edwards and made arrangements to meet Edwards in or around East Brunswick, New Jersey, for the purpose of purchasing quantities of crack cocaine and heroin from Edwards. Before the transaction, law enforcement agents met the CS at a predetermined location, where they searched the CS and the CS’s vehicle for contraband and currency with negative results. Law enforcement agents also provided the CS with an amount of money to make the controlled purchase from Edwards, and they equipped the CS with a covert audio and video recording device to record the transaction.

3. Thereafter, the CS, acting at the direction of law enforcement, drove to a hotel located in or around East Brunswick, New Jersey, where the CS met with Edwards and handed Edwards the money that law enforcement had provided. The CS and Edwards then entered the CS’s vehicle and drove to East Orange, New Jersey to meet with Edwards’s supplier, Yasin. Upon arriving in East Orange, Edwards exited the CS’s vehicle, entered Yasin’s vehicle, and instructed the CS to follow Yasin’s vehicle. The CS then followed Yasin’s vehicle

to a parking lot for a fast-food restaurant in Newark, New Jersey. A short time later, Edwards exited Yasin's vehicle and entered the CS's vehicle.

4. Approximately fifteen minutes later, Edwards received a telephone call from Yasin, who instructed Edwards to pull around the corner. The CS and Edwards exited the fast-food restaurant parking lot and drove around the corner as directed, at which time Yasin signaled for the CS and Edwards to follow Yasin. The CS and Edwards followed Yasin's vehicle to another location in Newark and parked. A short time later, Yasin entered the back seat of the CS's vehicle and handed the CS a clear plastic bag containing a quantity of suspected crack cocaine, which the CS handed to Edwards. Yasin also handed the CS a quantity of suspected heroin, which the CS secreted in his/her pants. Yasin then exited the CS's vehicle, and the CS and Edwards departed the area. The CS drove Edwards back to the hotel in or around East Brunswick where Edwards was staying. Edwards and the CS exited the CS's vehicle, entered the hotel, and proceeded to Edwards's hotel room. While inside Edwards's hotel room, the CS handed Edwards the suspected heroin, and Edwards weighed the suspected crack cocaine. A short time later, Edwards handed the CS a plastic bag containing a quantity of suspected crack cocaine and provided the CS with a quantity of suspected heroin. The CS then exited Edwards's hotel room, walked back to his/her vehicle, and departed the area.

5. Following the transaction with Edwards described above, the CS again met with law enforcement. The CS provided law enforcement with the suspected crack cocaine, the suspected heroin, and the recording device.

6. On or about March 29, 2021, a sealed criminal complaint was filed in the United States District Court for the District of New Jersey, docketed under Magistrate Number 21-6021 (DEA), charging Edwards and Yasin each with distribution and possession with intent to distribute cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C). The Court also issued warrants for Edwards's and Yasin's arrest.

7. On or about April 6, 2021, law enforcement arrested Edwards and Yasin pursuant to the arrest warrants. Since that time, Edwards and Yasin have been detained in the Essex County Correctional Facility ("ECCF") in Newark, New Jersey.

The Defendant's Threats and Retaliation Against the CS

8. The day after Edwards's arrest, on or about April 7, 2021, the CS drove to a convenience store located in Cliffwood Beach, New Jersey, to pick up another person ("Individual-1"). As the CS pulled into the parking lot of the convenience store, a gray Honda pulled alongside the CS's vehicle. The CS immediately recognized the driver of the gray Honda as POWERS, whom the CS knew to be Edwards's girlfriend. POWERS yelled at the CS and stated, in sum

and substance and among other things, “We know you are a snitch, you are fucking dead, we will have people kill you and if you get me caught up in a federal charge I will personally kill you.” Individual-1, who was present nearby, also heard and observed POWERS threaten the CS as described above.

9. Law enforcement obtained from ECCF a recording of an April 7, 2021 telephone call between Edwards and POWERS corroborating the confrontation described above. During that telephone call, POWERS confided in Edwards that she had threatened the CS that day. Specifically, POWERS advised Edwards, in sum and substance, that she had confronted the CS at the convenience store and warned the CS, among other things, to “keep [the CS’s] kids inside,” and that the CS was “lucky” and “that if [the CS] didn’t do what [the CS] did I’d fuck [him/her] up.” POWERS further stated to Edwards, in sum and substance, that she (POWERS) knew that the CS was responsible for Edwards’s arrest.

10. Two days later, on or about April 9, 2021, POWERS again confronted the CS in the parking lot of a commercial building, located in Cliffwood, New Jersey, and again threatened the CS for the CS’s assistance during law enforcement’s investigation of Edwards and Yasin. During this encounter, POWERS threatened the CS and stated, in sum and substance, “You are done. You will see. You fucking snitch.” Law enforcement subsequently obtained video footage, captured by a security camera covering the parking lot of the commercial building, which showed POWERS confronting the CS in the parking lot.