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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **SUPERSEDING CRIMINAL**  
 : **COMPLAINT**  
 v. :  
 : Honorable James B. Clark, III  
 RAHEEM JOHNSON, :  
 a/k/a "Smoke" : Mag. No. 21-12231

I, Daniel Shim, the undersigned complainant being duly sworn, state that 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 Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**




\_\_\_\_\_  
Daniel Shim  
Special Agent, Federal Bureau of Investigation

Special Agent Shim attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)

May 27, 2021  
Date

District of New Jersey  
County and State

HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE

James B. Clark III   
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**

(Distribution of, and possession with intent to distribute, cocaine base)

During the week of April 4, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHEEM JOHNSON,  
a/k/a "Smoke,"**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and 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).

**Count Two**

(Distribution of, and Possession with Intent to Distribute, Heroin)

During the week of May 2, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHEEM JOHNSON,  
a/k/a "Smoke,"**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

**Count Three**

(Possession with Intent to Distribute Heroin)

On or about May 27, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHEEM JOHNSON,  
a/k/a "Smoke,"**

did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

**COUNT FOUR**

(Possession of a Firearm by a Convicted Felon)

On or about May 27, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHEEM JOHNSON,  
a/k/a "Smoke,"**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, namely a WASR-10 7.62x39 millimeter semi-automatic rifle, bearing serial number 1-66096-04 and twenty (20) rounds of 7.62x39 millimeter ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIVE**

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 27, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**RAHEEM JOHNSON,  
a/k/a "Smoke,"**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, as charged in Count Four of this Superseding Complaint, did knowingly possess a firearm, namely, a WASR-10 7.62x39 millimeter semi-automatic rifle, bearing serial number 1-66096-04.

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

## **ATTACHMENT B**

I, Daniel Shim, am a Special Agent with the Federal Bureau of Investigation. 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, recorded communications, 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. During the week of April 4, 2021, a confidential informant working at the direction and under the supervision of law enforcement met with Raheem Johnson, a/k/a "Smoke" ("JOHNSON"), at an apartment complex located on Hayes Street in Newark, New Jersey (the "Hayes Street Property"). JOHNSON provided the confidential informant with a quantity of suspected cocaine base in exchange for money. The suspected cocaine base was a white rock-like substance packaged in vials, consistent with cocaine base packaged for distribution. This narcotics purchase was captured on a body-worn recording device.

2. During the week of May 2, 2021, a confidential informant working at the direction and under the supervision of law enforcement met with JOHNSON at the Hayes Street Property. JOHNSON provided the confidential informant with a quantity of suspected heroin in exchange for money. The suspected heroin was a white powdery substance packaged in glassine envelopes, consistent with heroin packaged for distribution. This narcotics purchase was captured on a body-worn recording device.

3. On or about May 26, 2021, law enforcement obtained a warrant to search JOHNSON's apartment at the Hayes Street Property. On or about May 27, 2021, law enforcement executed the warrant and recovered, among other things, a WASR-10 7.62x39 millimeter semi-automatic rifle, bearing serial number 1-66096-04 (the "Firearm"), a box containing twenty rounds of 7.62x39 millimeter ammunition (the "Ammunition"), and more than two dozen bricks of suspected heroin. The suspected heroin was a white powdery substance packaged in glassine envelopes, consistent with heroin packaged for distribution. The Firearm was located in close proximity to the heroin.

4. On or about April 4, 2010, JOHNSON was convicted in the Superior Court of New Jersey, Essex County, of manufacturing, distributing, or dispensing a controlled dangerous substance within 1,000 feet of a school, in violation of N.J.S.A. 2C:35-7, a crime punishable by a term of imprisonment exceeding one year. JOHNSON was sentenced to a four-year term of imprisonment, which included a two-year term of parole ineligibility.

5. The Firearm and the Ammunition were manufactured outside the State of New Jersey and thus moved in and affected interstate commerce prior to May 27, 2021.