UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	: Hon. Jessica S. Allen
	: : Mag. No. 21-8161
v.	:
	: CRIMINAL COMPLAINT
RONNIE HOLLEY, and	:
SHADEE HOLLEY	:

I, George Panagatos, 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 U.S. Drug Enforcement Administration and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:

George Panagatos Special Agent Drug Enforcement Administration

Special Agent Panagatos attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A), on July 22, 2021 in the District of New Jersey

HONORABLE JESSICA S. ALLEN UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Narcotics)

From in or around March 2021, through on or about July 22, 2021, in Essex County, in the District of New Jersey and elsewhere, defendants,

RONNIE HOLLEY, and SHADEE HOLLEY

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

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

COUNT TWO

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

On or about July 22, 2021, in Essex County, the District of New Jersey, defendants,

RONNIE HOLLEY, and SHADEE HOLLEY

during and in relation to a drug trafficking crime for which the defendants may be prosecuted in a court of the United States, namely, the conspiracy to distribute of fentanyl and cocaine base, as charged in Count One of this Criminal Complaint, did knowingly possess, use, and carry a firearm.

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

COUNT THREE

(Possession of Firearm and Ammunition by a Convicted Felon)

On or about July 22, 2021, in Essex County, in the District of New Jersey, the defendant,

RONNIE HOLLEY,

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, namely, one Taurus PT111 G2 9mm handgun with serial number TKS61141, loaded with 7 rounds of ammunition.

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

ATTACHMENT B

I, George Panagatos, am a Special Agent with the U.S. Drug Enforcement Administration ("DEA"). 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 part. Because this Complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a 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.

Law enforcement is engaged in an investigation in the District of New 1. Jersey and elsewhere into members and associates of a set of the national Bloods Street gang known as Sex Money Murders ("SMM"). SMM operates in and around Newark, New Jersey. Since in or around 2007, members of SMM have engaged in violent disputes with other gangs, trafficked narcotics, and committed various firearms offenses. Moreover, there has been a recent uptick in violent crimes, including shootings and homicides, in Newark and elsewhere, including several incidents believed to be related to a dispute between SMM and Law enforcement has learned that SHADEE HOLLEY ("S. its rival gangs. HOLLEY") and RONNIE HOLLEY ("R. HOLLEY") (collectively, the "HOLLEY BROTHERS") are high-ranking members of the SMM.

Law enforcement has learned that the HOLLEY BROTHERS operate 2. a sophisticated narcotics distribution operation in and around the intersection of Martin Luther King Boulevard and Spruce Street ("MLK and Spruce") in Specifically, since in or around March 2021, law Newark, New Jersey. enforcement has observed on a nearly daily basis, the HOLLEY BROTHERS, either individually or collectively, arrive at MLK and Spruce in a rotating fleet of cars, and oversee several individuals conducting narcotics transaction in the area on their behalf. Based on my training, experience, and knowledge of the investigation, the fact that those individuals meet with the HOLLEY BROTHERS in and around the times of those transactions, I believe those individuals are "drug runners" for the HOLLEY BROTHERS and other SMM leaders, who conduct narcotics transactions on behalf of the HOLLEY BROTHERS in the area of MLK and Spruce such that the HOLLEY BROTHERS can thwart law enforcement detection. Moreover, law enforcement has learned that the HOLLEY BROTHERS use two locations ("Stash House-1" and "Stash House-1") (collectively, the "Stash Houses") and at least three cars ("Car-1," "Car-2," and "Car-3") (collectively, the "Cars") to store narcotics, narcotics-proceeds, and firearms.

3. During the investigation, law enforcement began working with a confidential source (the "CS"), who agreed to conduct controlled purchases from

S. HOLLEY on behalf of law enforcement. From in or around March 2021, through in or around July 2021, the CS conducted approximately eight controlled purchases of fentanyl and crack-cocaine from S. HOLLEY on behalf of law enforcement. Notably, while R. HOLLEY was mainly responsible for coordinating all of the controlled purchases with the CS, R. HOLLEY often directed other individuals—including S. HOLLEY on at least one occasion—to physically hand the narcotics to the CS on his behalf.

4. Law enforcement obtained the narcotics that the CS purchased from S. HOLLEY immediately after each controlled purchase. In total, law enforcement recovered approximately 40 grams of a mixture and substance that field-tested positive for the presence of fentanyl. Moreover, law enforcement also recovered approximately 28 grams of a substance that, based on its appearance, and my training and experience, contains cocaine base.

5. Based on the above, law enforcement conducted lawful search of the Stash House-1. During the search of Stash House-1, law enforcement recovered approximately \$1,500 USD in small denominations—much of which was wrapped in rubber bands—consistent with narcotics proceeds, narcotics packaging paraphernalia, and a kilogram press. Law enforcement also encountered R. HOLLEY in Stash House-1 and arrested him.

6. Law enforcement also located Car-1 and Car-2 at Stash House-1 during the search. Law enforcement subsequently conducted a lawful search of both Car-1 and Car-2. During the search of Car-1 law enforcement recovered additional suspected narcotics and one loaded Taurus PT111 G2 9mm handgun ("Firearm-1"). Based on my training, experience, and knowledge of the investigation, I believe that R. HOLLEY stored Firearm-1 inside of Car-1 to protect the narcotics located in Car-1.

7. During the search of Stash House-2, law enforcement recovered approximately 5 bundles of a substance that, based on my training, experience, and knowledge of the investigation, contained fentanyl. Law enforcement also recovered approximately 11 vials of a substance that based on my training, experience, and knowledge of the investigation, contained cocaine base.

8. Subsequently, law enforcement located S. HOLLEY driving Car-3. Law enforcement stopped Car-3 and arrested S. HOLLEY. Law enforcement then presented Car-3 to both a trained narcotics canine and a trained ballistics canine, both of whom indicated for the presence of odor of narcotics and ballistics, respectively, inside of Car-3. The search of Car-3 remains ongoing.

9. The investigation has shown that Firearm-1 was manufactured outside the State of New Jersey, and thus necessarily had to travel in interstate

commerce prior to when R. HOLLEY possessed them on or about July 22, 2021. Firearm-1 also appears capable of, and designed to, expel a projectile.

10. Prior to knowingly possessing Firearm-1, R. HOLLEY knew he was a convicted felon as he had at least one felony conviction for which he received a sentence of more than one year. For example, on or about June 30, 2009, R. HOLLEY was convicted in Superior Court in Essex County, New Jersey, of unlawful possession of a weapon, in violation of N.J.S.A. 2C:39-5D, a crime punishable by imprisonment for a term exceeding one year, and for which R. HOLLEY was sentenced to three years' imprisonment.