

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

Glen Long,
a/k/a "Bless,"
a/k/a "Max"

Case No.

Mag. No. 21-mj-7030 (KMW)

Defendant(s)

AMENDED 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 December 2020 through February 2021 in the county of Salem and elsewhere in the
District of New Jersey, the defendant(s) violated:

Code Section

Description of Offenses

21 U.S.C. § 846

See Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

☒ Continued on the attached sheet.

SA Nicholas Singer
Complainant's signature

Nicholas Singer, Special Agent, DEA
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: 3/24/21

[Signature]
Judge's signature

City and state: District of New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge
Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: /s/Jeffrey B. Bender
Jeffrey B. Bender, Assistant U.S. Attorney

Date: March 24, 2021

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

Between in or about December 2020 and in or about February 2021, in the District of New Jersey and elsewhere, the defendant,

GLEN LONG,
a/k/a "Bless,"
a/k/a "Max,"

knowingly and intentionally conspired and agreed with others, known and unknown, to distribute and possess with intent to distribute at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, and at least 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and at least 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

ATTACHMENT B
AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTS

I. INTRODUCTION

I, Nicholas Singer, a Special Agent with the Drug Enforcement Administration ("DEA"), United States Department of Justice, being duly sworn, state as follows:

I. I am a Special Agent with the DEA and have been employed as a Special Agent with the DEA since August of 2008. I am currently assigned to the Camden Resident Office of the DEA's New Jersey Division, where I conduct investigations relating to, among other offenses, narcotics violations. I have been trained in various aspects of law enforcement, particularly the investigation of narcotics offenses. In the course of my training and experience, I have become familiar with the methods and techniques associated with the distribution of narcotics and the organization of drug conspiracies. During my employment with the DEA, I have been involved in multiple narcotics investigations. In the course of those investigations and others, I have conducted physical surveillance, interviewed cooperating witnesses, conducted and managed the controlled purchases of narcotics by undercover officers and informants, oversaw the consensual recordings of communications, analyzed telephone toll records and records relating to narcotics trafficking and money laundering, participated in the execution of search warrants (including the search of cellular telephones ("cell phones") and other electronic media), and secured other relevant information using various investigative techniques, including electronic surveillance. I have also debriefed and supervised the activities of numerous confidential sources who have provided information and assisted in the federal and state prosecution of drug and violent crime offenders. I have previously served as the affiant for affidavits used in support of applications for state and federal Title III interceptions, and I have led the investigations that utilized those Title III interceptions.

2. Based on my training and experience, I am familiar with the methods of drug organizations

and their operations, the terminology used by members of these organizations, and the measures they employ to distribute controlled substances and exert influence and control within the marketplace for illicit drugs. I am familiar with the means and methods used by drug traffickers to smuggle, import, and distribute controlled substances, and to conceal and launder of proceeds from the unlawful sale of controlled substances. I am aware that individuals involved in the illicit distribution of controlled substances routinely attempt to conceal their identities and the locations at which they conduct drug transactions. I also am familiar with the investigative techniques and practices utilized by law enforcement to investigate and dismantle drug distribution organizations. I have also worked closely with other agents and task force officers who have experience and expertise in wire and electronic interception. My training and my experience working with other agents and task force officers has provided me familiarity with the Title III investigative technique and the laws and rules that govern that technique.

3. Based on my training and experience, I know that the success of drug trafficking organizations ("DTOs") depends upon maintaining extensive contacts with their co-conspirators. I am aware that drug traffickers commonly use cellular telephones, including voicemail, push-to-talk ("PTT"), and text messages, in furtherance of their drug trafficking activities and to maintain contact with their suppliers, couriers, customers, and others involved in the unlawful transportation, storage, distribution, and marketing of controlled substances. It is essential that DTO members maintain contact with one another and utilize expedient means of communication. To do this, constant access to telephone communication, including cellular access, push-to-talk, and access to the internet to communicate through social media such as Facebook, Twitter, Instagram, and text messaging, among other mediums, is necessary. The use of telephonic and other electronic communication is essential in maintaining timely long distance and local contacts with the original suppliers and those down the organizational chain, including local dealers. I am aware that those involved in illegal drug operations often subscribe to their

telephones and cellular telephones in the names of others or purchase pre-paid cellular telephones that require the purchaser to provide little or no identifying information to purchase and utilize the phone, all of which is done in an effort to avoid detection and thwart the efforts of law enforcement. Additionally, based on my training and experience, I am aware that members of DTOs often use multiple cellular telephones to conduct unlawful narcotics activity. Specifically, I know that one of the ways individuals involved in the illicit distribution of controlled substances conceal their activities in an attempt to thwart potential electronic surveillance by law enforcement is by using multiple cellular telephones and changing their cellular telephone numbers frequently. I am also aware that drug traffickers often speak in vague, guarded, or coded language in an attempt to conceal the illicit nature of their conversations. I am familiar with the terminology, "lingo," and code words used in the drug trafficking trade, especially among organizations that engage in street-level distribution.

4. As one of the "case" or lead investigative agents, I have supervised this investigation and am thoroughly familiar with the information contained in this Affidavit, either through personal investigation or through information provided by other law enforcement officers who have obtained information that they, in turn, have reported to me. I also have reviewed available documents that are relevant to this investigation. I make this Affidavit based on personal knowledge derived from my participation in this investigation and on information I believe to be reliable and accurate from the following sources:

- a. my training and experience investigating drug trafficking offenses and the training and experience of colleagues with whom I am working on this investigation;
- b. oral and written reports, and documents relating to this investigation that I have obtained and received from agents of the DEA, other federal law enforcement agencies, and local law enforcement officers;

- c. discussions I have had concerning this investigation with experienced narcotics investigators;
- d. physical surveillance conducted by the DEA, other federal law enforcement agents, and local law enforcement agencies, the results of which have been reported to me either directly or indirectly;
- e. public records;
- f. telephone toll records, pen register and trap and trace data, and telephone subscriber information;
- g. information obtained through execution of cellular telephone and tracking search warrants;
- h. statements of confidential sources;
- i. consensually monitored and recorded phone calls and text messages, including communications involving Target Telephone 1;
- j. controlled purchases of methamphetamine by an undercover law enforcement officer, and covert audio and/or video recordings made in connection with these operations; and
- k. the Court-authorized Title III interception of wire and electronic communications over Target Telephone 1, Target Telephone 2, and Target Telephone 3.

5. When describing conversations or text messages, unless otherwise noted, I have provided a summary of or excerpts from those communications. When providing transcriptions of conversations, either I or another monitoring agent has listened to the conversation and provided a substantially verbatim transcript of the it, accounting for the fact that the final transcripts of these conversations may contain minor edits for syntax or language, which would not bear on the overall substance or meaning of the

conversation, as I have reported and transcribed it herein. At times, interpretations of certain coded words or cryptic or slang phrases are placed in parentheses or explained following the summaries, where deemed necessary, and where they can be interpreted based on agents' training and experience.

6. Because this Affidavit is being submitted for the limited purpose of setting forth probable cause for the issuance of the requested complaints and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to support issuance of the requested complaints and arrest warrants.

II. SUMMARY

A. BACKGROUND OF INVESTIGATION

7. In or about the month of July 2020, I and other law enforcement investigators initiated the instant investigation into the unlawful drug distribution activities of an organization (herein, "Bless DTO"), which operates throughout southern New Jersey and in and around Philadelphia, Pennsylvania. Through various investigative measures, including those described throughout this Affidavit, I and other members of the investigative team have determined that the Bless DTO distributes controlled substances, including crystal methamphetamine and heroin, throughout the greater Philadelphia area and southern New Jersey.

8. As set forth in greater detail below, investigators have determined that the DTO members are actively engaged in a drug distribution conspiracy. In making this determination, investigators have used techniques including, but not limited to, interviews of confidential human sources, consensual recordings of meetings and conversations, controlled drug purchases of crystal methamphetamine by an undercover officer from Bless DTO member SUMMER BRUNNER ("BRUNNER"), toll and phone record analyses, deployment of GPS vehicle tracking devices on BRUNNER's cars, use of pen register/trap and trace devices, physical and video surveillance, and Title III interceptions and recordings of wire and electronic communications as described herein.

9. The crystal methamphetamine sold by BRUNNER to an undercover officer over the course of the investigation was later tested by a DEA laboratory, which confirmed that the substance was 99% (+/- 6%) pure methamphetamine hydrochloride. Similarly, the crystal methamphetamine recovered during a January 12, 2021 car stop of two Bless DTO associates was later tested by a DEA laboratory, which confirmed that the substance was 27.2 grams (+/- 0.2 grams) of 98% (+/- 6%) pure methamphetamine hydrochloride. The crystal methamphetamine recovered from a Bless DTO associate during a December 2, 2020 encounter with local law enforcement was later tested by a DEA laboratory, which confirmed that the substance was 33.312 grams (+/- 0.003 grams) of 95% (+/- 6%) pure methamphetamine hydrochloride. Laboratory testing of the other suspected crystal methamphetamine recovered during the investigation is pending.

10. Many of the seized drugs and drug deals described in this Affidavit involve crystal methamphetamine, including the BRUNNER drug deals (typically 2 to 4 ounces of crystal methamphetamine during each of numerous drug deals); as well as a series of arrests of Bless DTO associates on various dates from early December 2020 through mid-February 2021, each of which resulted in seizures of crystal methamphetamine in amounts ranging from approximately 1 ounce to approximately 5 ounces per seizure. I therefore believe that the Bless DTO conspired to distribute at least 50 grams of methamphetamine and at least 500 grams of substances containing methamphetamine.

11. I also believe that the Bless DTO conspired to distribute at least 100 grams or more of a mixture or substance containing a detectable amount of heroin. My belief is based on drug deals involving AARON MASON ("MASON"), SAVON SKIPWITH ("SKIPWITH"), and others distributing what I believe are "bundles" or "boxes" of heroin. Based on my training, experience, and knowledge of common practices of DTOs in the greater Philadelphia and southern New Jersey area, a bundle typically contains between approximately 0.5 and 1 gram of heroin. Based on the frequency and consistency with which

apparent heroin customer BUYER 1 and others have obtained heroin from the Bless DTO, and the length of time the Bless DTO has been distributing heroin to these customers, I believe that the Bless DTO has conspired to distribute at least 100 grams of heroin. For example, during a six-week period spanning January 12, 2021 through February 22, 2021, intercepted communications reflect DTO members and customers arranging sales of at least 63 items (*e.g.*, “one whole,” “two Bs,” etc.). Based on my knowledge of the investigation, the terminology used, the locations of these sales, and the participants in these sales, I believe that these items were heroin. I believe 50 grams is a conservative estimate of the amount of heroin in these 63 items. Therefore, taking into account the numerous additional sales that occurred outside this six-week time period, I believe that the Bless DTO has conspired to distribute at least 100 grams of heroin.

12. Through the investigation, investigators have developed information regarding the inner workings of the Bless DTO and its leader, who goes by, among other aliases, “BLESS.” BLESS works in concert with and directs co-conspirators (*i.e.*, runners) to distribute crystal methamphetamine and other drugs to other members of the Bless DTO. In general, it appears that when a member of the Bless DTO wants to obtain drugs from BLESS, that individual contacts BLESS over Target Telephone 2 or Target Telephone 3, both of which are described in more detail below. BLESS uses the same telephone to dispatch a runner to meet with and provide drugs to the individual. To arrange the logistics of the meeting and/or to facilitate the parties actually locating each other for the meeting, BLESS frequently coordinates three-way telephone calls between himself, the runner, and the person seeking to obtain drugs from BLESS via the runner.

B. AUTHORIZED INTERCEPTIONS OF WIRE AND ELECTRONIC COMMUNICATIONS

13. During the course of the investigation, law enforcement agents obtained authorization to intercept wire and electronic communications over three cellular telephones: the cellular telephone bearing number (856) XXX-5047 and International Mobile Subscriber Identity (“IMSI”) number

XXXXXXXXXXXX2938 belonging to SUMMER BRUNNER ("Target Telephone 1"); the cellular telephone bearing number (484) XXX-9404 and IMSI number XXXXXXXXXXXX5462, with no listed subscriber but activated and used by BLESS ("Target Telephone 2"); and the cellular telephone bearing number (484) XXX-8785 and IMSI number XXXXXXXXXXXX5906, with no listed subscriber but activated and used by BLESS ("Target Telephone 3").

III. PROBABLE CAUSE TO ARREST AND CHARGE DTO MEMBERS

14. During the course of the investigation, law enforcement has used various investigative means and techniques in an effort to disrupt and dismantle the DTO to include: consensual audio recordings, controlled drug purchases, pen registers, search warrants, video surveillance, interviews of potential sources, and Title III interception of wire and electronic communications. Information gathered from these investigative techniques has established probable cause to arrest the individuals set forth as follows.

GLEN LONG A/K/A BLESS A/K/A MAX

15. GLEN LONG, a/k/a "BLESS," a/k/a "Max" (hereinafter, "BLESS"), is a leader within the Bless DTO. Based on the investigation conducted to date, I believe BLESS oversees other members of the Bless DTO engaged in drug trafficking activities and provides crystal methamphetamine and other controlled substances to lower level distributors of his DTO for further distribution to others in southeastern Pennsylvania and southern New Jersey. On March 4, 2021, agents executing a federal search warrant at BLESS's apparent residence in Philadelphia, Pennsylvania, recovered evidence leading to the identification of BLESS as GLEN LONG, including a Pennsylvania driver's license in LONG's name.

16. Throughout the investigation, BLESS has used Target Telephone 2 and Target Telephone 3 to arrange the distribution of drugs with other members of the Bless DTO. For example, BLESS coordinated the drug deals for multiple ounces of crystal methamphetamine with his runners and BRUNNER on numerous occasions, including but not limited to:

- a. the December 3, 2020 transaction detailed under the heading for SALEEM SMITH (“SMITH”), below; and
- b. the December 28, 2020 transaction detailed under the heading for KEVIN SALMON (“SALMON”), below.

17. BLESS directed SKIPWITH to distribute heroin to others on various dates, including several dates in February 2021, as described under the heading for SKIPWITH.

18. BLESS directed MASON to distribute crystal methamphetamine and heroin to others on various dates including February 8, 2021 and February 24, 2021, as described under the heading for MASON.

19. BLESS arranged the distribution of various quantities of crystal methamphetamine to STEVEN BROWN (“BROWN”) via runners on multiple occasions between December 22, 2020 and February 25, 2021, as described under the heading for BROWN.

20. BLESS also arranged the distribution of crystal methamphetamine to a Bless DTO associate via SALMON on January 8, 2021 that resulted in the recovery of approximately one ounce of suspected crystal methamphetamine, as described in greater detail under the heading for SALMON, below.

SALEEM SMITH

21. SMITH is a member of the Bless DTO who distributes drugs to customers and other members.

22. Law enforcement agents have identified SMITH as the runner who helped arrange and/or participated in several drug deals with BROWN, some of which are described under the heading for BROWN. SMITH also participated in a December 3, 2020 transaction orchestrated by BLESS, during which SMITH provided drugs to BRUNNER in exchange for cash.

December 3, 2020 Drug Deal Between BRUNNER, BLESS, and SMITH:

23. On December 2, 2020, between 6:48 p.m. and 9:21 p.m., law enforcement agents intercepted a series of text messages between Target Telephone 1, used by BRUNNER, and Target Telephone 2, used by BLESS. During the text communication, the following conversation ensued:

BRUNNER: Heyyyy
BLESS: Hey hey
BRUNNER: Hows 2 work for early am? Solid? None of my business but ..whose the last guy i met at the casino? He is a handsome man.
BLESS: The 2...absolutely for the am..
BRUNNER: So what time works for tomorrow
BRUNNER: So..i may need it tonight...whats the latest..11ish midnight?
BRUNNER: Whats up?
BLESS: That's if u coming over here
BRUNNER: Im just gonna relax n stay in tonight..can i be on the schedule for the am?

24. Based on my training, experience, and knowledge of the investigation, I believe that BRUNNER contacted BLESS to obtain additional drugs for BRUNNER to distribute to others. After a back-and-forth about scheduling, BRUNNER requested to proceed the following day.

25. On December 3, 2020, between 8:58 a.m. and 9:38 a.m., law enforcement agents intercepted a series of text messages between Target Telephone 1, used by BRUNNER, and Target Telephone 2, used by BLESS. During the text communication, the following conversation ensued:

BLESS: U up
BRUNNER: Im up
BLESS: Send address if u ready cuz we are
BRUNNER: I just woke up..but im not gonna shower or nothing...[casino name] again? Or can someone come to me?
BLESS: He meeting 2 ppl there rn
BRUNNER: If he comes here..i will give 100
BLESS: Send address??
BRUNNER: 214 harrison street deepwater nj
BLESS: Yes
BRUNNER: Letme know an eta please
BLESS: Who house is this
BRUNNER: 2 solids...see ya soon
BRUNNER: Its abandoned..i may be buying it
BRUNNER: My friend lives 2 doors down

BLESS: So y is he coming to a abandoned house
 BLESS: Wtf
 BRUNNER: No i was going to be at my friends
 BRUNNER: Ok..there is a gas station on that main road
 BRUNNER: Letme get that address
 BLESS: Plz don't do that again
 BRUNNER: I apologize..i didnt mean anything by that i just was going to get info off the property today so I could call about it..apologies
 BRUNNER: I havent had my coffee yet...literally just woke up
 BRUNNER: Thank u

26. Based on my training, experience, and knowledge of the investigation, I believe that BRUNNER and BLESS continued the prior night's conversation and arranged a meeting at a gas station between BRUNNER and a runner dispatched by BLESS for the purpose of providing drugs to BRUNNER for further distribution. I believe BLESS agreed to send a runner to New Jersey to meet BRUNNER because the runner was already meeting others there ("He meeting 2 ppl there rn"). Prior to agreeing on a meeting at the gas station, BRUNNER had recommended meeting at an abandoned house in Deepwater, New Jersey, but BLESS indicated concern at BRUNNER's recommendation and rejected that as a meeting location.

27. Soon thereafter, on December 3, 2020, between 10:10 a.m. and 11:32 a.m., law enforcement agents intercepted a series of text messages between Target Telephone 1, used by BRUNNER, and Target Telephone 2, used by BLESS. During the text communication, the following conversation ensued:

BRUNNER: Hey there..do i have much time?
 BLESS: Ima let u Knw when he on his way
 BRUNNER: Ok..so i got time to run my dogs?
 BLESS: Yes
 BLESS: 550 N. Broadway Pennsville NJ. 08070
 BRUNNER: Yes..its the only gas station in deepwater
 BLESS: He n route [text at 10:55 a.m.]
 BRUNNER: Ok..ty
 BLESS: U welcome
 BRUNNER: Here

28. Based on my training, experience, and knowledge of the investigation, I believe that BRUNNER and BLESS were coordinating the time and location of the meeting. During the above-described text messages, at approximately 11:18 a.m., agents observed BRUNNER's Blazer depart her residence and maintained surveillance until she arrived at a gas station located at 550 N Broadway in Penns Grove, New Jersey. (Pennsville, Penns Grove, and Deepwater, New Jersey are adjacent small towns.) After arriving at the location, BRUNNER parked her vehicle in the lot between the store and the gas pumps.

29. Soon thereafter, on December 3, 2020, at 11:43 a.m., law enforcement agents intercepted an outgoing call from Target Telephone 1, used by BRUNNER, to Target Telephone 2, used by BLESS. Prior to the parties speaking, it is believed that Target Telephone 2 called (267) XXX-2887, and toll records indicate that all three phone numbers engaged in conversation. Agents believe based on the below-described surveillance that the individual using the (267) XXX-2887 phone number to speak with BRUNNER was SMITH, a runner directed by BLESS to meet BRUNNER. The conversation is excerpted as follows:

SMITH: Yo.
BRUNNER: Hello.
SMITH: Hello!
BRUNNER: Hi.
SMITH: Hey.
BRUNNER: Hey [Giggles] hey, I'm here.
SMITH: Aright huh, where I'm meeting you at?
BRUNNER: Was that?
SMITH: The gas station.
BRUNNER: Yeah.
SMITH: I'm meeting you at the gas station?
BRUNNER: Uh-huh.
SMITH: Aright I'm way, I'm on my way up there right now.
BRUNNER: Okay
SMITH: It say I'm, it say I'm a half.
BRUNNER: Oh you are that far away?
SMITH: Yeah, I'm a half.
BRUNNER: Oh shit, okay.

SMITH: That's cool.
BRUNNER: Aright well I'm not going to sit here, um, okay I'm going to just go um, to, to friends house and I'll be back here.
SMITH: Aright.
BRUNNER: Okay thanks.
SMITH: Alright that's... This Summer right?
BRUNNER: Yup.
SMITH: Aright, aright bet, I'll be there Summer.
BRUNNER: Alright thank you.
SMITH: Uh-huh.
BRUNNER: Alright bye.

30. Based on my training, experience, and knowledge of the investigation, I believe that BRUNNER called BLESS to inquire when BLESS's runner would be arriving to the pre-arranged meeting. I further believe that BLESS arranged a three-way call so that BRUNNER and the runner could speak directly about the meeting. Based in part on the interception reflecting one male speaker who was on his way to the gas station meeting and the electronic location information of Target Telephone 2 reflecting that its location was not at the gas station meeting, I do not believe BLESS spoke during this three-way call. They confirmed that the runner would be meeting BRUNNER ("This Summer, right?") at "the gas station" in about 30 minutes ("I'm a half [away]"). After the telephone call, surveilling law enforcement agents observed BRUNNER depart the gas station but return several minutes later.

31. Soon thereafter, on December 3, 2020, between 12:06 p.m. and 12:08 p.m., law enforcement agents intercepted a series of text messages between Target Telephone 1, used by BRUNNER, and Target Telephone 2, used by BLESS. During the text communication, the following conversation ensued:

BLESS: 10mins
BRUNNER: Ok

32. Based on my training, experience, and knowledge of the investigation, I believe that BLESS was indicating to BRUNNER that his runner would be arriving at the gas station at approximately 12:16 p.m. ("10 mins") to meet BRUNNER. At approximately 12:20 p.m., law enforcement observed a

white Volvo (bearing Pennsylvania tag LJZ8722 and registered to SMITH at his address) arrive in the gas station parking lot. Moments later, law enforcement agents observed BRUNNER walk from her Blazer to the passenger side window of the Volvo. At approximately 12:23 p.m., BRUNNER walked away from the Volvo, and entered the gas station convenience store. BRUNNER then exited the store, returned to her Blazer, left the gas station and headed south on Route 49. Based on my training, experience, and knowledge of the investigation, I believe that BRUNNER obtained drugs from SMITH during their brief interaction and BRUNNER provided SMITH cash in exchange for the drugs.

33. At approximately 12:26 p.m., law enforcement agents observed the Volvo exit the gas station parking lot, traveling north on Route 49. At approximately 1:01 p.m., law enforcement agents observed the Volvo arrive at a residence in Blackwood, New Jersey, at which time a white male, later identified as a family member of a Bless DTO member, entered the passenger side of the vehicle. The Volvo departed the residence, circled the block, returned minutes later, and the family member exited the vehicle to walk back to the residence. Based on my training, experience, and knowledge of the investigation, I believe this was a drug transaction because, among other reasons, it is common for those engaged in a drug transaction to circle the block in order to avoid police detection.

34. At approximately 1:18 p.m. the Volvo arrived at the toll plaza on the New Jersey side of the Ben Franklin Bridge, at which time a law enforcement officer positioned in front of the Volvo was able to see the driver inside the Volvo, and identified the driver as SMITH based on SMITH's driver's license photograph.

KEVIN SALMON

35. SALMON distributes drugs to customers and other members of the Bless DTO. Two examples are provided below.

December 28, 2020 Drug Deal Between BRUNNER, BLESS, and SALMON:

36. On December 28, 2020, between 6:30 p.m. and 7:06 p.m., law enforcement agents

intercepted the following texts between Target Telephone 1, used by BRUNNER, and Target Telephone 2, used by BLESS:

BRUNNER: Heyyy..2 avail? Any pink?
BLESS: Yup
BRUNNER: Ok..so..what's the schedule looking like? Anyone avail to come my way?
BLESS: Casino
BRUNNER: Which one..
BRUNNER: Are they open now
BLESS: Or come
2900 popular st
Phila pa
That's right off the high way then u can hop right back on
BLESS: ???
BRUNNER: I can come to popular street
BLESS: How long
BRUNNER: I can be there at 8:30
BRUNNER: Does that work for ya

37. On December 28, 2020, at 7:12 p.m., law enforcement agents intercepted what appears from toll records to be a three-way call between Target Telephone 1, used by BRUNNER, Target Telephone 2, used by BLESS, and a runner using telephone number (904) XXX-4375. The intercepted conversation is excerpted as follows:

BRUNNER: Hey.
RUNNER: Was up?
BRUNNER: So this 8:30 work?
RUNNER: Uh-huh.
BRUNNER: Okay, and then um, and then the-the "pink"... Okay
RUNNER: Aright.
BRUNNER: Aright thank you.
RUNNER: Uh-huh.
BRUNNER: Bye.

38. On December 28, 2020, between 8:14 p.m. and 9:01 p.m., law enforcement agents intercepted the following texts between Target Telephone 1, used by BRUNNER, and Target Telephone 2, used by BLESS:

BRUNNER: Hey. I'm leaving now..a slight delay..can you get ur hands on any dips..but I don't need singles I want the whole O

BLESS: U jus want 1
 BRUNNER: I want 1 pink n 1 reg...n then a price on that liquud
 BLESS: Did u leave yet
 BLESS: Liquid??
 BRUNNER: 20 min away
 BRUNNER: For Dipper s
 BLESS: One sec bout to ask them now
 BRUNNER: 6 min away [Message "liked" by BLESS]
 BRUNNER: Here
 BLESS: Kind car
 BLESS: 5mins away
 BRUNNER: White 2door
 BRUNNER: I gotta run in n use the bathroom
 BLESS: Ok

39. On December 28, 2020, at approximately 9:00 p.m., law enforcement observed a black male seated in a grey Chevrolet sedan, bearing Pennsylvania license plate LMV5897, parked in the area of 2900 Poplar Street, Philadelphia, Pennsylvania. The sedan was registered to an individual with the same surname as SALMON. A law enforcement agent recognized the vehicle and the driver, later identified as SALMON, from previous surveillance.

40. On December 28, 2020, at 9:17 p.m., law enforcement agents intercepted an incoming call to Target Telephone 1, used by BRUNNER, from Target Telephone 2, used by BLESS. The intercepted conversation is excerpted as follows:

BLESS: Hey summer what, what, what, what... where you at?
 BRUNNER: I'm in um... I just walked out of [names discount department store]
 [Background: TV playing]
 BLESS: Which one...
 [Voices overlap]
 BRUNNER: I'm in my two-two door white car.
 BLESS: What's the... Which one you go to?
 BRUNNER: The one on um... Monumental Road or whatever.
 BLESS: How the hell you get over there?
 BRUNNER: That's the ... I got directions on that. That's where I was the other day. The other day I came here.
 BLESS: I sent you the address you said I could come to Poplar street, you never came there.
 BRUNNER: Oh Poplar? Okay, I must to click on the address from the other day.
 BLESS: Yeah.

BRUNNER: Alright, where about to... I can click on it and then head over, I'm sorry that was my fault, I just... so how?

[Voices overlap]

BLESS: Well you... you can meet at another [U/I]. [Pause] Alright just stay there he gonna come to you.

BRUNNER: Okay.

BLESS: A'right.

BRUNNER: Alright, thanks, bye.

41. At approximately 9:25 p.m., based on intercepted communications indicating that BRUNNER went to the incorrect location, law enforcement agents surveilled the discount department store located in the area of 4000 Monument Road in Philadelphia, and observed BRUNNER's Dodge sedan parked in the store parking lot. Law enforcement agents then saw the same Chevrolet sedan bearing Pennsylvania license plate LMV5897, observed earlier at the Poplar Street location arrive in the store parking lot and park on the passenger side of BRUNNER's vehicle. SALMON exited the driver's side of the Chevrolet sedan, approached BRUNNER's passenger side, opened BRUNNER's passenger door and leaned into the vehicle. Moments later, SALMON closed BRUNNER's passenger door and returned to his vehicle. Then both vehicles left the area.

42. On December 28, 2020, at 9:59 p.m., law enforcement agents intercepted Target Telephone 1, used by BRUNNER, texting "Thank you" to Target Telephone 2, used by BLESS.

43. Based on my training, experience, and knowledge of the investigation, BRUNNER contacted BLESS to obtain drugs, BLESS agreed to provide BRUNNER drugs, and BLESS directed a runner, SALMON, to meet BRUNNER to deliver the drugs to BRUNNER. Unlike most of BRUNNER's drug deals, BRUNNER sought "liquid . . . dippers" in addition to what I believe to be two ounces of crystal methamphetamine. I understand the other drug to be PCP. BRUNNER had recently met BLESS runners at different Philadelphia locations, and she mistakenly went to an incorrect address for the meeting. Upon realizing the mistake, BLESS directed SALMON to go from the planned location to the discount department store where BRUNNER had mistakenly traveled, and the drug deal occurred.

January 8, 2020 Drug Deal Between DTO Member 1, BLESS, and SALMON:

44. On January 8, 2021, at 3:08 p.m., law enforcement agents intercepted incoming messages from DTO Member 1 to Target Telephone 2, which had been used by BLESS prior to him switching to Target Telephone 3 on or about December 30, 2020:

DTO MEMBER 1: Yo bro

DTO MEMBER 1: Need 🤔

45. BLESS did not respond to these messages on Target Telephone 2, as he had previously ceased sending outgoing messages over Target Telephone 2. Interceptions over Target Telephone 3 did not begin until January 12, 2021, but toll records reflect that at 3:10 p.m. on January 8, 2021, two minutes after DTO Member 1's incoming texts to Target Telephone 2, Target Telephone 3 contacted him. DTO Member 1 and Target Telephone 3 proceeded to communicate until approximately 4:25 p.m. on January 8, 2021.

46. On January 8, 2021, law enforcement had been conducting surveillance in the area of Poplar Street in Philadelphia, Pennsylvania, where the Bless DTO had previously conducted drug deals. At approximately 3:59 p.m., law enforcement observed a black Kia arrive in the area and SALMON exit the Kia. At approximately 4:22 p.m., a white Kia driven by DTO Member 1 arrived in the same area. Law enforcement observed SALMON enter the passenger side of the white Kia and depart the area. At approximately 4:29 p.m., law enforcement observed the white Kia return to Poplar Street, SALMON exit the white Kia, and the white Kia depart the area and drive to New Jersey.

47. Local law enforcement in Deptford Township, New Jersey, conducted a traffic stop of the white Kia, recovered approximately one ounce of suspected crystal methamphetamine from the center console of the Kia, and arrested DTO Member 1.

SAVON SKIPWITH A/K/A VON

48. During the course of the investigation SKIPWITH, a/k/a "Von," has acted as a runner

distributing drugs on behalf of BLESS using (267) XXX-8158. Several examples are listed below.

Heroin Drug Deal on January 24, 2021

49. On January 24, 2021 at 9:00 p.m., law enforcement agents intercepted a call over Target Telephone 3, used by BLESS, with BUYER 4, during which BUYER 4 indicated that he wanted “a couple slips.” Shortly thereafter, on January 24, 2021 at 9:50 p.m., law enforcement agents intercepted a three-way call between Target Telephone 3, used by BLESS, a runner (believed to be SKIPWITH) using (267) XXX-8158, and BUYER 4. During this three-way call, the runner directed BUYER 4 to “Kenmore and Haddington.” Shortly after the call, on January 24, 2021 at approximately 11:08 p.m., Delaware State Police conducted a traffic stop of the vehicle driven by BUYER 4 and, after a positive K-9 alert for the presence of narcotics, recovered 3 baggies of a substance packaged in light blue wax paper, consistent with the appearance and packaging of “slips” of heroin. The substance is in the custody of the Delaware State Police pending laboratory testing.

Drug Deals and Identification of SKIPWITH on February 15, 2021

50. On February 15, 2021, law enforcement agents intercepted several three-way calls over Target Telephone 3, used by BLESS, (267) XXX-8158, used by SKIPWITH, and the below individuals, all of whom have repeatedly previously obtained drugs believed to be heroin from the Bless DTO. The calls are excerpted as follows:

February 15, 2021 at 9:47 a.m.:

BUYER 2: 63rd and Columbia? I'll be there in two minutes bro, in a white van.

SKIPWITH: Aright.

BUYER 2: Bring out a whole one, thanks.

February 15, 2021 at 10:04 a.m. (also excerpted above):

SKIPWITH: Go to 63rd and Jefferson bro.

BUYER 1: Aright, uh... bring me uh a B. I'll be there in one minute.

February 15, 2021 at 2:08 p.m.:

SKIPWITH: Go to 63rd and Jefferson.

BUYER 3: 63rd and Jefferson. Alright dude. You gonna have to give me 30 – 40 minutes.

I'm all the way out somewhere.

February 15, 2021 at 2:50 p.m.:

BUYER 3: Yo, I'm down here bro, 63rd and Jefferson.

SKIPWITH: Aright, here I come bro. What side you on though? The abandon [S/L] side or the other side?

51. Based on my training, experience, and knowledge of the investigation, I believe the above communications reflect BLESS and SKIPWITH arranging drug deals with BUYER 2, BUYER 1, and BUYER 3 between 9:47 a.m. and 2:50 p.m. on February 15, 2021.

52. On February 15, 2021 at 4:31 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 3, used by BLESS, to SMITH, in which they discussed a meeting at a convenience store in Upper Chi Chester, Pennsylvania until BLESS indicates he will "call V," which I understand to mean SKIPWITH.

53. A few minutes later, on February 15, 2021 at 4:36 p.m., law enforcement agents intercepted a conversation between BLESS and SKIPWITH during which BLESS asked SKIPWITH to do him a "favor" in exchange for \$200. The favor involved SKIPWITH meeting an unidentified individual at the convenience store location previously discussed between BLESS and SMITH. At 5:26 p.m., SKIPWITH indicated to BLESS that he was at the convenience store "by the ATM." Law enforcement conducting surveillance at the same convenience store at the time of the call identified SKIPWITH standing by the store's ATM. BLESS then provided SKIPWITH additional information to help SKIPWITH locate the other individual participating in the transaction.

February 23, 2021 Sale of Heroin to BUYER 1

54. On February 23, 2021, law enforcement agents conducting surveillance in the area of the 900 block of Kenmore Road in Philadelphia saw SKIPWITH conduct a drug deal with BUYER 1, as confirmed with intercepted communications over Target Telephone 3. These intercepted communications include BLESS arranging a three-way call with himself, SKIPWITH, and BUYER 1 to coordinate the

logistics of a drug deal for “1 B and a half.” At the appointed time, SKIPWITH left a house on the 900 block of Kenmore Road, walked to the vehicle driven by BUYER 1, appeared to hand him drugs through the vehicle’s window, and returned to the Kenmore Road house. Based on my knowledge of the investigation, I believe “a B and a half” to be code language for a bundle and a half of heroin.

AARON MASON

55. MASON is a runner who has distributed drugs on behalf of BLESS on multiple dates, including February 8, 2021 and February 25, 2021. Two examples are provided below.

Drug Deal Involving MASON on February 8, 2021

56. On February 8, 2021 at 4:49 p.m., law enforcement agents intercepted what appears to be a three-way call between Target Telephone 3, used by BLESS, a Bless DTO runner believed to be MASON, and BUYER 4, excerpted as follows:

MASON: [Aside: Yeah, (U/I) the roads are good.]
BUYER 4: Hey, where do you want me to head to?
MASON: Where you at?
BUYER 4: Uh, I’m actually... like, uh, he sent me to you, I didn’t mean to, but like, uh, where... I just asked him where, what, where you want me... I’m actually at the, the [names discount department store] in Springfield.
MASON: A’right, hold on one second. Go to [names large hardware store chain] on... Baltimore Pike.
BUYER 4: Okay, cool. You want me to tell you how long, uh, ‘til I get there?
MASON: Yeah, sure. [Background: Door beeping / UM: A’right, bro.] [Aside: A’right, bro.]
BUYER 4: A’right, give me one second. [Names large hardware store chain] on Baltimore Pike...
MASON: [Aside: A’right. You too, bro.]
BUYER 4: Uh, it says I will be there in... it says I’ll be there in 11 minutes, 10 minutes.
MASON: You said 11 minutes?
BUYER 4: Is that cool? Yeah, 11 minutes. I can hurry up.
MASON: Um... yeah, you can go there. Uh... I’ll be down there... hold on, 20 minutes. [Background: Beeping sound]
BUYER 4: Okay, so I’ll just take my time.
MASON: A’right. What, what you need?
BUYER 4: Uh, I just needed, um, I just needed, uh, like eight (8), eight (8) slices. I might have enough for nine (9), actually.
MASON: A’right. I’m on my way down.
BUYER 4: Uh, gray corolla, I’ll see you in 20 minutes at [large hardware store chain].

MASON: A'right. [U/I]
BUYER 4: Thanks, man.

57. Based on my training, experience, and knowledge of the investigation, I believe that BLESS directed MASON to provide BUYER 4 drugs ("eight (8), eight (8) slices. I might have enough for nine (9)"). An intercepted three-way call on February 8, 2021 at 5:10 p.m. between Target Telephone 3, the same runner believed to be MASON, and BUYER 4 reflects the runner believed to be MASON and BUYER 4 finding each other outside the hardware store. In conjunction with the 5:10 p.m. call, law enforcement surveillance observed the individual believed to be BUYER 4 briefly enter a blue Chevrolet registered to MASON in the hardware store parking lot for what I believe is the pre-arranged drug deal.

Drug Deal Involving MASON on February 24, 2021

58. On February 24, 2021, law enforcement observed the same blue Chevrolet registered to MASON on February 24, 2021 drive to conduct what appear to be drug deals, as confirmed with interceptions over Target Telephone 3, with BUYER 5 for "1 b," which I believe is one bundle of heroin; BUYER 4 for "3," which I believe is a reference to heroin; and BUYER 6 for "a ball," which I believe is most likely an "eight-ball" of crystal methamphetamine. During later surveillance on February 24, 2021, law enforcement identified MASON as the driver of the blue Chevrolet registered to MASON.

STEVEN BROWN

59. During the course of the investigation, BROWN has obtained drugs from other members of the Bless DTO for further distribution on multiple occasions. Two examples are provided below.

January 13, 2021 Drug Deal Between BROWN, BLESS, and SMITH:

60. On January 13, 2021 at 10:21 p.m., law enforcement agents intercepted what appears to be a three-way call between Target Telephone 3, used by BLESS, a runner using (267) XXX-9581, who I believe, based in part on his distinctive voice, to be SMITH, and (610) XXX-7895, used by BROWN, excerpted as follows:

BROWN: Uh, I'm, I'm at the crib.
 SMITH: A'ight. You was coming down?
 BROWN: Huh?
 SMITH: You was coming down?
 BROWN: Nah, nah, nah. I ju... I wanna see if I get a drop off.
 SMITH: A'right. Where your, where your crib at? Where you at?
 BROWN: Uh, the [Stammers] train, train station.
 SMITH: A'right. 4[XX] Sharon Ave?
 BROWN: Yeah.
 SMITH: A'right, I got you. I'll be up there.
 BROWN: A'right. Uh, yo, so... is it, is it five (5)?
 SMITH: Huh?
 BROWN: Is that five (5)?
 SMITH: What, you want a donut, right?
 BROWN: Yeah.
 SMITH: Yeah, it's 3.5.
 BROWN: Nah, nah, nah. I mean, [U/I]
 [Voices Overlap]
 SMITH: I meant 28, 28.
 BROWN: No, I mean is it five (5) bills?
 SMITH: Oh, you need five (5) of 'em?
 [Voices Overlap]
 BROWN: Nah, nah, I was saying is it five (5)...
 [Voices Overlap]
 SMITH: Nah, they six (6), they six (6).
 BROWN: They six (6)? Okay, a'right. Just checking.
 SMITH: Yeah. A'ight.
 BROWN: A'ight, bro. I got you.
 SMITH: Say no more.
 BROWN: A'ight, a'ight.

61. Based on my training, experience, and knowledge of the investigation, I believe that BROWN was attempting to coordinate a delivery of drugs from BLESS's runner, who I believe to be SMITH, but there was some miscommunication about the quantity. It appears that BROWN ultimately agreed to obtain one ounce of drugs ("a donut" and "28 [grams]") and SMITH indicated that the price was \$600 ("is it five bills?" and "Nah, they six, they six).

January 27, 2021 Drug Deal BROWN, BLESS, and SMITH:

62. On January 27, 2021 at 5:40 p.m. and 5:57 p.m., law enforcement agents intercepted what appear to be three-way calls between Target Telephone 3, used by BLESS, a runner using (267) XXX-

9581, who I believe, based in part on his distinctive voice, to be SMITH, and (610) XXX-7895, used by BROWN. During the first call, SMITH indicated: "I'm about to be pulling up." During the second call, SMITH indicated: "Yo, I'm out here, bro." Based on my training, experience, and knowledge of the investigation, I believe that SMITH met with BROWN to provide the drugs per the agreement between BROWN and BLESS a few hours earlier.

63. On January 27, 2021 between 6:25 p.m. and 6:40 p.m., law enforcement agents intercepted a series of text messages between Target Telephone 3, used by BLESS, and (XXX) 522-7895, believed to be utilized by BROWN, excepted as follows:

BLESS: Damn bro I bring the number down and U still was short
BLESS: \$960
BLESS: Supposed to b \$1000
BROWN: Real shit my bad one of us must have miscounted where can I catch up with you
BLESS: Later on I'll let u Knw when he come pass that way
BROWN: OK

64. Based on my training, experience, and knowledge of the investigation, I believe that BROWN was supposed to pay BLESS for what I believe to be two ounces of drugs at \$500 per ounce but paid the runner \$960 instead of \$1,000. BLESS indicated that a runner would return to collect the shortage.

IV. SEALING

65. Because this application and Affidavit pertain to an ongoing criminal investigation, and because disclosure of the information contained herein as well a disclosure of the complaints and warrants being requested may compromise the investigation and increase the risk of harm for law enforcement officers who are responsible for conducting the arrests, I request that this Affidavit, the criminal complaints, the arrest warrants, and all related documents be filed under seal until further order of the Court, except for a copy of the arrest warrants to be served at the time of execution.

V. CONCLUSION

66. Wherefore, I submit that there is probable cause to believe that the members of the conspiracy described above, from at least in or about December 2020 to in or about February 2021, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and possess with intent to distribute at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, and at least 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and at least 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), in violation of Title 21, United States Code, Section 846.

67. The information contained in this Affidavit is known to be true and correct to the best of my knowledge, information and belief.

This affidavit was sworn out via telephone, in compliance with Federal Rule of Criminal Procedure 4.1.

SA Nicholas Singer
Nicholas Singer, Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me on this 24th day of March, 2021.

Karen M. Williams
Honorable Karen M. Williams
United States Magistrate Judge