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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Michael A. Hammer  
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 SHAQUAN LITTLE-BETHEA : Mag. No. 22-10119  
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 :

I, Chad Joseph, the undersigned complainant 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 Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

**SEE ATTACHMENT B**



Special Agent Chad Joseph  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Special Agent Joseph attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on March 17, 2022.

Honorable Michael A. Hammer  
United States Magistrate Judge

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about June 2, 2021, in Union County, in the District of New Jersey, and elsewhere, the defendant,

**SHAQUAN LITTLE-BETHEA.**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce a firearm, namely a H&K, model VP9, 9mm semi-automatic pistol, bearing serial number 224-098-044, with sixteen (16) rounds of ball ammunition, in violation of Title 18, United States Code, Section 922(g).

**COUNT TWO**

(Possession with Intent to Distribute Controlled Substances)

On or about June 2, 2021, in Union County, in the District of New Jersey, and elsewhere, the defendant,

**SHAQUAN LITTLE-BETHEA,**

did possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

## **ATTACHMENT B**

I, Chad Joseph, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. 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 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. In or around May 2021, law enforcement received information about an individual, later identified as Shaquan Little-Bethea ("LITTLE-BETHEA"), who was distributing controlled dangerous substances in Elizabeth, New Jersey. Law enforcement learned that LITTLE-BETHEA organized narcotics transactions over the phone prior to meeting a buyer in person for a sale.

2. On or about June 2, 2021, law enforcement, utilizing an undercover agent ("UC-1"), contacted LITTLE-BETHEA to conduct a controlled buy on that day. Through text messages, LITTLE-BETHEA agreed to meet UC-1 in the vicinity of Elizabeth Avenue and Fifth Street, in Elizabeth, New Jersey (the "Controlled Buy Location"), at approximately 1:15 p.m.

3. At approximately 1:15 p.m., UC-1 received a call from LITTLE-BETHEA stating that he was a few minutes away from the Controlled Buy Location. Through its surveillance, law enforcement was able to observe an individual inside a parked blue Hyundai SUV (the "Hyundai") in the vicinity of the Controlled Buy Location. The individual was on the phone and matched the descriptions that the law enforcement had of LITTLE-BETHEA. Law enforcement also observed this individual looking around at his surroundings.

4. Shortly after, LITTLE-BETHEA called UC-1 on the phone and told UC-1 to come to LITTLE-BETHEA's car. When UC-1 asked LITTLE-BETHEA which vehicle he was referring to, LITTLE-BETHEA stated "just come to the damn car, and stop playing." When UC-1 stepped out of his unmarked police vehicle, LITTLE-BETHEA started driving away in the Hyundai on Elizabeth Avenue, in Elizabeth, New Jersey. Subsequently, law enforcement activated the sirens and lights of its vehicle and pursued the Hyundai in an effort to conduct a motor vehicle stop. But the Hyundai did not stop and continued to flee until LITTLE-BETHEA lost control of his car and struck a tree on Hope Lane, of Elizabeth, New Jersey.

5. LITTLE-BETHEA then exited the Hyundai and began to flee on foot. During the foot pursuit, law enforcement observed LITTLE-BETHEA in possession of a handgun with a distinct white and red sticker on it. Law

enforcement also observed the magazine of the handgun fall to the ground and LITTLE-BETHEA discarding the handgun under a parked vehicle.

6. Eventually, law enforcement detained LITTLE-BETHEA and arrested him. A search incident to his arrest revealed that LITTLE-BETHEA was in possession of 38 clear vials containing suspected crack cocaine and 17 glassine envelopes containing suspected heroin. Additionally, law enforcement recovered the discarded handgun, a H&K, model VP9, 9mm semi-automatic pistol, bearing serial number 224-098-044, with a white and red sticker affixed to it (the "Firearm"), along with sixteen (16) rounds of ball ammunition (the "Ammunition").

7. The Firearm and the Ammunition were manufactured outside the State of New Jersey, and thus necessarily traveled in interstate commerce prior to June 2, 2021.

8. Prior to being in possession of the Firearm, LITTLE-BETHEA was previously convicted of at least one felony offense. For example, on or about August 7, 2015, LITTLE-BETHEA was convicted in the Superior Court of New Jersey of unlawful possession of a weapon, in violation of N.J.S.A. 2C:39-5B, a crime punishable by imprisonment for a term exceeding one year. In fact, LITTLE-BETHEA was sentenced to approximately five (5) years of imprisonment for this offense.