
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Edward S. Kiel
 :
 DAWAN BROWN, : Mag. No. 22-15138
 a/k/a "DB" :

I, Michael Rutkowski, 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 Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

Michael Rutkowski
Michael Rutkowski, Special Agent
Federal Bureau of Investigation

Special Agent Rutkowski attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1

June 15, 2022
Date

at District of New Jersey
County and State

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE

Edward S. Kiel
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Controlled Substances)

On or about June 14, 2022 in the District of New Jersey and elsewhere,
the defendant,

**DAWAN BROWN,
a/k/a “DB,”**

did knowingly and intentionally possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 400 grams or more 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 841(b)(1)(A).

ATTACHMENT B

I, Michael Rutkowski 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 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. Since at least January 2022, law enforcement has been investigating drug trafficking activity in the District of New Jersey and elsewhere, to include in and around Harrison, New Jersey. During the investigation, law enforcement learned that Dawan Brown, a/k/a “DB,” (“BROWN”) distributes narcotics in New Jersey.

2. Through the use of various investigative techniques, including, but not limited to, physical and fixed surveillance, law enforcement learned that BROWN packages and distributes large amounts of heroin from an apartment in a building located in Harrison, New Jersey (the “Stash Location”).

3. On or about June 13, 2022, law enforcement obtained search warrants for the Stash Location as well as a residence in Cliffside Park, New Jersey, where BROWN lives (“BROWN’s Residence”).

4. The FBI executed the search warrants on the Stash Location and BROWN’s Residence on June 14, 2022. During the search of BROWN’s Residence, law enforcement recovered, among other items:

- Approximately \$169,000;
- Various jewelry which includes what appears to be diamond necklaces, gold watches, and a gold ring;
- Five cell phones;
- Safety deposit keys.

5. During the search of the Stash Location, law enforcement recovered, among other items:

- Approximately two kilograms of substances that, based on their appearance and packaging, and the investigation to date, law enforcement believes that they contain heroin and fentanyl, some in

plastic bags in “raw” heroin form and some already packaged into “bricks”¹ for distribution.

- Drug paraphernalia, including a ledger, a safe, scales, a coffee and spice grinder, ink pads, stamps, ziplock bags, vacuum bags and a vacuum bag sealer machine, razor blades, glassine envelopes and strainers;
- Approximately \$44,000 that was contained within the safe along with some of the suspected heroin and fentanyl.

6. A portion of the suspected heroin and fentanyl field tested positive for the presence of fentanyl. Based upon the packaging and the use of fentanyl as a cutting agent, and the recovery of approximately 122 bricks (or approximately 6,100 glassine envelopes) of suspected heroin, the substances found contain at least 400 grams of fentanyl and at least one kilogram of heroin mixed with fentanyl.

¹ A “brick” of heroin consists of 50 individual glassine envelopes of heroin packaged together in groups of ten (known as a “bundle”) and then wrapped all together in paper. Fentanyl is often used as a cutting agent to mix with the heroin when packaged for distribution.