
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

JAMAL WILSON,
a/k/a "Vill,"
THEODORE MEEKINS,
a/k/a "Meech,"
LOUIS WILLIAMS,
a/k/a "Bake,"
CLINTON RODRIGUEZ,
a/k/a "C-Rod,"
KAI BOWMAN, JR.,
GLENN MOORE,
RASHIED McKINES,
MICHAEL WILLIAMS,
a/k/a "Ice,"
DERRICK JILES,
DION MORRIS,
JERRY FARMER, and
JAMES EDWARDS

CRIMINAL COMPLAINT

Mag. No. 22-3016 (TJB)

RECEIVED

AUG 15 2022

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

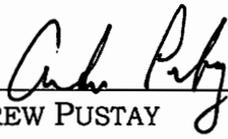
I, Andrew Pustay, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about the dates set forth in Attachment A to this complaint, in the District of New Jersey and elsewhere:

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:

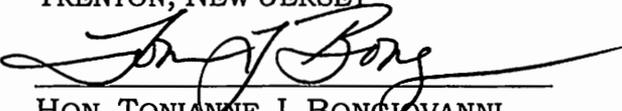
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



ANDREW PUSTAY
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE
AUGUST 15, 2022
TRENTON, NEW JERSEY



HON. TONIA J. BONGIOVANNI
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One

(Distribution of and Possession with Intent to Distribute a Controlled Substance)

On or about June 9, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

JAMAL WILSON,
a/k/a "Vill,"

did knowingly and intentionally distribute and possess with intent to distribute 28 grams or more 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)(B).

Count Two
(Distribution of and Possession with Intent to Distribute Controlled
Substances)

On or about June 23, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

JAMAL WILSON,
a/k/a "Vill,"

did knowingly and intentionally distribute and possess with intent to distribute more than 100 grams of heroin, a Schedule I controlled substance; and more than 28 grams of cocaine base, a Schedule II controlled substance.

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

Count Three

(Distribution of and Possession with Intent to Distribute Controlled Substances)

On or about June 28, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

JAMAL WILSON,
a/k/a "Vill,"

did knowingly and intentionally distribute and possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

Count Four
(Distribution of and Possession with Intent to Distribute a Controlled
Substance)

On or about January 13, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

THEODORE MEEKINS,
a/k/a "Meech,"

did knowingly and intentionally distribute and possess with intent to distribute heroin, a Schedule I controlled substance.

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

Count Five

(Possession with Intent to Distribute a Controlled Substance)

On or about March 8, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

THEODORE MEEKINS,
a/k/a "Meech,"

did knowingly and intentionally possess with intent to distribute heroin, a Schedule I controlled substance.

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

Count Six
(Possession of a Firearm by a Convicted Felon)

On or about March 8, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

THEODORE MEEKINS,
a/k/a "Meech,"

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a loaded firearm, namely, a loaded 9mm caliber Glock 26 semi-automatic firearm bearing a defaced serial number, which law enforcement subsequently raised and identified as BMXV441, 10 rounds of 9mm ammunition, and the firearm was in and affecting commerce.

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

Count Seven

(Distribution of and Possession with Intent to Distribute Controlled Substances)

On or about June 3, 2021, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

LOUIS WILLIAMS,
a/k/a "Bake,"

did knowingly and intentionally distribute and possess with intent to distribute heroin, a Schedule I controlled substance, and fentanyl (N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide), a Schedule II controlled substance.

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

Count Eight

(Possession with Intent to Distribute Controlled Substances)

On or about June 28, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

CLINTON RODRIGUEZ,
a/k/a "C-Rod,"

did knowingly and intentionally possess with intent to distribute controlled substances, namely, more than 28 grams of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

Count Nine

(Possession with Intent to Distribute Controlled Substances)

On or about July 5, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

KAI BOWMAN, JR.,

did knowingly and intentionally possess with intent to distribute controlled substances, namely, heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

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

Count Ten

(Possession with Intent to Distribute Controlled Substances)

On or about June 23, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

GLENN MOORE,

did knowingly and intentionally possess with intent to distribute controlled substances, namely, more than 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and more than 28 grams 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)(B).

Count Eleven

(Possession with Intent to Distribute a Controlled Substance)

On or about June 9, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

RASHIED McKINES,

did knowingly and intentionally possess with intent to distribute a controlled substance, namely, more than 28 grams 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)(B).

Count Twelve
(Possession with Intent to Distribute a Controlled Substance)

On or about July 1, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

MICHAEL WILLIAMS,
a/k/a "Ice,"

did knowingly and intentionally possess with intent to distribute a controlled substance, namely, cocaine, a Schedule II controlled substance.

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

Count Thirteen

(Distribution of and Possession with Intent to Distribute a Controlled Substance)

On or about September 14, 2020, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

DERRICK JILES,

did knowingly and intentionally distribute and possess with intent to distribute fentanyl (N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide), a Schedule II controlled substance.

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

Count Fourteen

(Distribution of and Possession with Intent to Distribute a Controlled Substance)

On or about January 6, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

DION MORRIS,

did knowingly and intentionally distribute cocaine, a Schedule II controlled substance.

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

Count Fifteen

(Possession with Intent to Distribute a Controlled Substance)

On or about July 12, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

JERRY FARMER,

did knowingly and intentionally possess with intent to distribute a controlled substance, namely, heroin, a Schedule I controlled substance.

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

Count Sixteen

(Possession with Intent to Distribute Controlled Substances)

On or about June 29, 2022, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

JAMES EDWARDS,

did knowingly and intentionally possess with intent to distribute controlled substances, namely, heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

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

ATTACHMENT B

I, Andrew Pustay, am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since 2004. I have been involved personally in the investigation of this matter. The information contained in this complaint is based on my personal knowledge and on information obtained from other sources, including: (i) statements made or reported by various witnesses with knowledge of relevant facts; (ii) my review of documents and evidence obtained through court orders, subpoenas, and other sources; (iii) assistance provided to law enforcement by multiple confidential sources of information deemed credible and reliable; and (iv) my review of wire and electronic communications intercepted pursuant to court-authorized wiretaps. Because this complaint is submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the contents of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in sum and substance and in part, and the statements set forth herein are based on preliminary summaries and quotations of those communications.

I. BACKGROUND

1. Beginning in or around July 2020, the FBI and other law enforcement agencies conducted an investigation of individuals engaged in unlawful drug-trafficking activities in and around the area of Garfield, Cleveland, and Logan Avenues in the City of Trenton, New Jersey, and elsewhere.

2. Garfield, Cleveland, and Logan Avenues are parallel streets that intersect with East State Street, a Trenton thoroughfare, in the Northeast section of Trenton. The investigation revealed that this area of Trenton (referred herein to as the "GCL" area) experiences high levels of crime, including pervasive narcotics activity and gun violence.

3. As described below, between in or around September 2020 and in or around February 2022, at least four confidential sources of information, acting at law enforcement's direction and supervision, executed multiple controlled purchases of heroin and other narcotics from defendants Derrick Jiles ("JILES"); Louis Williams, a/k/a "Bake" ("LOUIS WILLIAMS"); Theodore Meekins, a/k/a "Meech" ("MEEKINS"); and Jamal Wilson, a/k/a "Vill" ("WILSON"). Additionally, two members of law enforcement acting in an undercover capacity purchased heroin and other narcotics from defendants MEEKINS and LOUIS WILLIAMS. Moreover, on multiple occasions during the investigation, law enforcement made multiple seizures of unlawfully trafficked narcotics, including, among other seizures, suspected heroin, cocaine base,

and a firearm from a vehicle driven by defendant MEEKINS, who was a previously convicted felon.

4. As also described below, as the investigation developed, law enforcement obtained court authorization to intercept telephonic and electronic communications of defendant WILSON, whom the investigation revealed regularly trafficked substantial amounts of narcotics, including heroin, crack cocaine, and cocaine, to other drug dealers in and around the GCL area.

II. CONTROLLED PURCHASES

5. As noted above, law enforcement's investigation revealed substantial unlawful drug trafficking activity in the GCL area of Trenton, including in the nearby intersection of East State Street and South Olden Avenue in Trenton. During the investigation, law enforcement conducted numerous controlled purchases of narcotics from a number of individuals in those areas, using confidential sources of information and undercover law enforcement agents. Some of those controlled purchases of narcotics were from defendants JILES, MEEKINS, Dion Morris ("MORRIS"), and LOUIS WILLIAMS; and are summarized below.

JILES

6. Between in or around September 2020 and October 2020, law enforcement conducted at least four controlled purchases of heroin from JILES, as described below.

7. On or about September 14, 2020, a confidential source of information acting at the direction and supervision of law enforcement ("CS-1"), executed a video- and audio-recorded controlled purchase of suspected heroin from JILES. Law enforcement searched CS-1 and his/her vehicle for contraband and currency with negative results. Law enforcement provided CS-1 with a sum of United States currency for the purchase of heroin. Thereafter, CS-1 drove his/her vehicle to a location in the GCL area and parked. CS-1 approached a group of males at the intersection and asked for heroin. One of the males, later identified as JILES, agreed to sell a quantity of heroin to CS-1. JILES directed CS-1 to follow him (JILES) around the corner. CS-1 then entered his/her vehicle and followed JILES to another location in the GCL area adjacent to Garfield Avenue Playground (hereafter "Garfield Park"). Thereafter, JILES briefly met with another male and then approached CS-1 and sold CS-1 a quantity of heroin in exchange for United States currency. JILES provided his telephone number to CS-1 for future heroin purchases. CS-1 immediately departed the area in his/her vehicle and met law enforcement at a predetermined location. CS-1 provided law enforcement with the quantity of suspected heroin. The substance was submitted to a law

enforcement laboratory for chemical testing and was confirmed to contain a detectable amount of fentanyl.

8. Thereafter, on or about September 21, 2020, September 24, 2020, and October 8, 2020, CS-1, acting at law enforcement's direction and supervision, executed additional video- and audio-controlled purchases of fentanyl from JILES. Prior to each transaction, CS-1 contacted JILES to arrange for the narcotics purchases. During each of the transactions, CS-1 met JILES in or near Garfield Park in the GCL area. During each of these transactions, CS-1 provided United States currency to JILES and, thereafter, JILES provided a quantity of suspected fentanyl to CS-1. After the transactions, CS-1 left the area of Garfield Park in his/her vehicle and met with law enforcement at a predetermined location. CS-1 provided each of the quantities of suspected fentanyl to law enforcement. The substances that CS-1 purchased from JILES were submitted to a law enforcement laboratory for chemical testing and were each confirmed to contain a detectable amount of fentanyl.

9. On or about October 28, 2020, law enforcement arrested JILES on an outstanding arrest warrant in connection with unrelated charges. During his arrest, law enforcement seized a quantity of suspected heroin, stamped "MAJOR" in red ink, from JILES's person. Following the arrest, JILES remained detained on these charges for some time, prompting CS-1 to meet defendant MEEKINS for the purpose of purchasing narcotics in the GCL area at law enforcement's direction and supervision. Some of those transactions are described below.

MEEKINS

10. Between in or around October 2020 and in or about March 2022, CS-1, acting at law enforcement's direction and supervision, executed approximately 18 video- and audio-recorded controlled purchases of fentanyl and heroin from MEEKINS. Additionally, a federal law enforcement agent acting in an undercover capacity (hereafter "UC-1") participated in the purchases of heroin and fentanyl from MEEKINS on multiple occasions between in or around May 2021 and January 2022. Some of these transactions are summarized below.

11. On or about October 28, 2020 (as noted above, the same day that JILES was arrested), CS-1, acting at law enforcement's direction and supervision, executed a controlled purchase of suspected fentanyl from MEEKINS. Prior to the transaction, law enforcement searched CS-1 and his/her vehicle for contraband and currency with negative results, and provided CS-1 with a sum of United States currency. Law enforcement directed CS-1 to drive to a location in the GCL area to attempt to purchase heroin, and thereafter established physical surveillance of the area.

12. Law enforcement observed CS-1 approach the location and speak to a male later identified as MEEKINS. CS-1 told MEEKINS that s/he was looking for JILES. MEEKINS asked CS-1 what s/he was looking for, and CS-1 explained that s/he wanted to buy heroin. MEEKINS told CS-1 to go to Garfield Park. Thereafter, CS-1 drove to and parked in front of Garfield Park and, shortly thereafter, MEEKINS arrived in his vehicle. CS-1 and MEEKINS entered the park, where MEEKINS gave CS-1 a quantity of suspected heroin in exchange for United States currency. MEEKINS identified himself as "Meech," and provided CS-1 a telephone number with which to contact him for future heroin purchases. CS-1 then departed the area in his/her vehicle and met with law enforcement at a predetermined location. CS-1 provided law enforcement with five bricks of suspected heroin. The suspected heroin was submitted to a law enforcement laboratory for chemical testing and the suspected heroin was confirmed to contain a detectable amount of fentanyl.

13. On or about May 26, 2021, CS-1 and UC-1 executed a controlled purchase of heroin and fentanyl from MEEKINS, which was audio- and video-recorded. Before the transaction, CS-1 called MEEKINS and arranged to purchase a quantity of heroin and fentanyl from MEEKINS on Garfield Avenue near Garfield Park. Law enforcement provided CS-1 with an amount of United States currency with which to purchase the requested narcotics from MEEKINS. CS-1 and UC-1 then proceeded to Garfield Park, and law enforcement established physical surveillance. CS-1 and UC-1 parked in front of the park. Thereafter, law enforcement observed MEEKINS arrive in his vehicle and park on Garfield Avenue in front of the park. MEEKINS exited the vehicle and got into the rear seat of CS-1's vehicle. MEEKINS handed the agreed-upon quantity of heroin and fentanyl to UC-1, who then handed a sum of money to MEEKINS. UC-1 asked whether s/he should call MEEKINS in the future or CS-1 should. MEEKINS responded, "Nah, you [i.e., UC-1] can call me." MEEKINS exited the vehicle and returned to his vehicle.

14. Immediately thereafter, UC-1 and CS-1 left in CS-1's vehicle and met with law enforcement at a predetermined location. UC-1 provided other members of law enforcement the quantity of suspected heroin that they had purchased from MEEKINS, which bore an illegible blue ink stamp and contained a powdery substance. The substance was submitted to a law enforcement laboratory for chemical testing and the suspected heroin was confirmed to contain detectable amounts of heroin and fentanyl.

15. On or about June 16, 2021, CS-1 and UC-1 executed a controlled purchase of a substance containing a mixture of heroin and fentanyl from MEEKINS, which was audio- and video-recorded. Before the transaction, CS-1 called MEEKINS and arranged the purchase of a quantity of heroin from MEEKINS at Garfield Park. UC-1 obtained a sum of United States currency with which to purchase the requested heroin from MEEKINS. CS-1 and UC-1

then proceeded to Garfield Park, and law enforcement established physical surveillance. CS-1 and UC-1 parked in front of the park. Thereafter, CS-1 called MEEKINS and advised MEEKINS that s/he and UC-1 had arrived at the park. MEEKINS told CS-1 to “come into the park.” UC-1 gave the money to CS-1, who exited his/her vehicle and sat on a bench in the park. Thereafter, MEEKINS approached CS-1 and placed a black plastic bag containing the agreed-upon quantity of suspected heroin on the bench. CS-1 handed the money to MEEKINS, took the black plastic bag and entered his/her vehicle. Inside the vehicle, CS-1 handed the black plastic bag to UC-1, who observed the quantity of suspected heroin inside, some of which was wrapped in blue wrapping and some of which was wrapped in red wrapping.

16. Immediately thereafter, UC-1 and CS-1 left in UC-1’s vehicle and met with law enforcement at a predetermined location. UC-1 provided other members of law enforcement the suspected heroin that they had purchased from MEEKINS, which bore stamps of the word “SKY” in blue ink or an image of a flame in red ink. The suspected heroin was submitted to a law enforcement laboratory for chemical testing and was confirmed to contain a mixture of heroin and fentanyl.

17. On or about January 13, 2022, CS-1 and UC-1 executed a controlled purchase of heroin and fentanyl from MEEKINS, which was audio- and video-recorded. Before the transaction, at law enforcement’s direction, CS-1 called MEEKINS to arrange to purchase heroin. MEEKINS directed CS-1 to meet him at Columbus Park in Trenton.

18. Law enforcement provided UC-1 with an amount of United States currency with which to purchase the requested heroin from MEEKINS. UC-1 and CS-1 then proceeded to Columbus Park in UC-1’s vehicle. Thereafter, UC-1 saw MEEKINS park a red, two-door, Mercedes Benz sedan across the street from Columbus Park. UC-1 provided the money to CS-1, and UC-1 watched as CS-1 met MEEKINS on the sidewalk near UC-1’s vehicle. MEEKINS dropped a black plastic bag containing a quantity of suspected heroin on the sidewalk in the vicinity of CS-1. CS-1 then handed the money to MEEKINS. CS-1 picked up the black plastic bag, reentered UC-1’s vehicle, and handed the plastic bag containing the suspected heroin to UC-1. The suspected heroin was submitted to a law enforcement laboratory for chemical testing and was confirmed to contain detectable amounts of fentanyl and heroin.

19. On or about March 8, 2022, local law enforcement conducted a motor vehicle stop of MEEKINS while he was driving alone in Trenton after officers observed him commit a traffic violation. Based on information learned during the vehicle stop, law enforcement impounded MEEKINS’s vehicle pending an application for a search warrant; the officers allowed MEEKINS to leave. Thereafter, law enforcement obtained and executed a search warrant on MEEKINS’s vehicle and recovered, from a hidden “trap” compartment that had

been installed in the center console of the vehicle, approximately 52 bricks of suspected heroin; approximately 21 grams of suspected cocaine base; a loaded 9mm caliber Glock 26 semi-automatic firearm (the "Firearm") bearing a defaced serial number, which law enforcement subsequently raised and identified as BMXV441; 10 rounds of 9mm ammunition; and approximately \$4,400 in cash.

20. Law enforcement's investigation revealed that the Firearm was not manufactured in the State of New Jersey, and therefore traveled in interstate commerce before March 8, 2022.

21. On or about September 5, 2017, MEEKINS was convicted in the Superior Court of New Jersey, Mercer County, of possession with intent to distribute a controlled dangerous substance on or near school property, in violation of N.J.S.A. 2C:35-7, and he was sentenced to five years' imprisonment.

MORRIS

22. During the investigation, in or about October 2021, a confidential source of information ("CS-2") identified to law enforcement defendant MORRIS as a supplier of cocaine in and around Ewing, New Jersey.

23. On or about October 27, 2021, CS-2, acting at law enforcement's direction and supervision, executed a video- and audio-recorded controlled purchase of approximately 100 grams of cocaine from MORRIS. CS-2 and MORRIS arranged to meet at a location in Ewing through a series of text messages that law enforcement reviewed. Law enforcement searched CS-2 and his/her vehicle with negative results for contraband or currency, equipped CS-2 with audio- and video-recording equipment, and then provided CS-2 with United States currency with which to purchase cocaine from MORRIS. CS-2 then proceeded to the meeting location. Law enforcement observed a dark-colored pickup truck arrive at the meeting location at the prearranged time. CS-2 entered the truck and completed the transaction. Immediately after CS-2 exited the truck, it departed the area. Law enforcement followed the truck and observed MORRIS as the driver. CS-2 traveled to a predetermined location and provided law enforcement approximately 100 grams of suspected cocaine that CS-2 had purchased from MORRIS. The suspected cocaine field tested positive for cocaine and is pending further analysis at a law enforcement laboratory.

24. On or about January 6, 2022, CS-2, acting at law enforcement's direction and supervision, executed another a video- and audio-recorded controlled purchase of approximately 100 grams of cocaine from MORRIS. Before the transaction, CS-2 and MORRIS arranged to meet in Ewing through a series of text messages that law enforcement reviewed. Law enforcement searched CS-2 and his/her vehicle with negative results for contraband or currency and then provided CS-2 with United States currency with which to

purchase approximately 100 grams of cocaine from MORRIS. CS-2 then proceeded to the prearranged location. Law enforcement, conducting physical surveillance of MORRIS's residence in Ewing, observed MORRIS enter his truck and drive to the prearranged meeting location. CS-2 briefly approached MORRIS in the truck before both CS-2 and MORRIS left the area. CS-2 traveled to a predetermined location and met with law enforcement and provided law enforcement approximately 100 grams of suspected cocaine. The suspected cocaine base field tested positive for cocaine and is pending further analysis at a law enforcement laboratory.

LOUIS WILLIAMS

25. Between in or around December 2020 and in or around December 2021, a confidential source of information acting at law enforcement's direction and supervision ("CS-3") and a federal law enforcement agent acting in an undercover capacity ("UC-2") conducted a total of nine video- and audio-recorded controlled purchases of heroin and/or fentanyl from defendant LOUIS WILLIAMS, at various locations in Trenton, including at least one transaction executed in close proximity to defendant MEEKINS's residence, during which LOUIS WILLIAMS met with MEEKINS. That controlled transaction is described in paragraph 26, below.

26. More specifically, on or about June 3, 2021, UC-2 arranged to purchase a quantity of heroin from LOUIS WILLIAMS. When UC-2 met LOUIS WILLIAMS, LOUIS WILLIAMS entered UC-2's vehicle and directed UC-2 to the vicinity of MEEKINS's residence in Trenton. Once in the vicinity of MEEKINS's residence, UC-2 parked and observed LOUIS WILLIAMS meet with MEEKINS on the side of the road and engage in a hand-to-hand transaction. Immediately thereafter, LOUIS WILLIAMS reentered UC-2's vehicle and handed to UC-2 a quantity of suspected heroin, which a law enforcement laboratory later confirmed contained a mixture of heroin and fentanyl. UC-2 handed a sum of money to LOUIS WILLIAMS for the heroin/fentanyl.

27. Additionally, on at least two other occasions, June 8, 2021, and August 11, 2021, UC-2 met LOUIS WILLIAMS in Trenton and purchased quantities of a substance that a law enforcement laboratory later confirmed contained a mixture of heroin and fentanyl. Each of UC-2's purchases of heroin and fentanyl from Williams were audio- and video-recorded.

III. WIRETAPS

28. Based on the investigation, which included multiple controlled purchases of heroin and other investigative techniques, law enforcement identified defendant JAMAL WILSON, a/k/a "Vill," as a significant drug trafficker in the GCL area, specifically in the area of the Grand Court Villas apartment building (the "Grand Court Villas"); the intersection of East State

Street and South Olden Avenue; Garfield Park; other locations in the GCL area, and elsewhere in the greater Trenton area. As described herein, the investigation revealed that WILSON regularly distributed substantial amounts of heroin, cocaine base, and cocaine to other drug dealers and individual users.

29. During the investigation, from in or around May 2022 and continuing through in or around August 2022, law enforcement, acting pursuant to court-authorized wiretap orders, intercepted wire and electronic communications over two cellular telephone facilities that WILSON used in furtherance of his unlawful drug-trafficking activities: (i) a telephone facility ending in 2785 (the “WILSON 2785 Facility”); and (ii) a telephone facility ending in 3244 (the “WILSON 3244 Facility”) (collectively, the “WILSON Facilities”).

30. The telephone calls and text messages intercepted over these telephone facilities, combined with physical and video surveillance, information provided by multiple confidential sources deemed credible and reliable, and other investigative techniques revealed the scope and details of WILSON’s unlawful drug-trafficking activities and those to whom he unlawfully distributed controlled substances.

31. The intercepted communications on the WILSON Facilities established, among other things, that WILSON distributed, for profit, significant quantities of heroin, crack cocaine, and cocaine to co-defendants and other drug dealers and end users in and around the GCL area and the surrounding area. Summarized below are some of the communications that law enforcement intercepted over the WILSON Facilities reflecting WILSON’s unlawful drug-trafficking activities and the unlawful drug-trafficking activities also committed by individuals with whom WILSON dealt, including defendants Clinton Rodriguez, a/k/a “C-Rod” (“RODRIGUEZ”); Kai Bowman, Jr. (“BOWMAN”); Rashied McKines (“McKINES”); Michael Williams (“MICHAEL WILLIAMS”); Glenn Moore (“MOORE”); Jerry Farmer (“FARMER”); and James Edwards (“EDWARDS”).

RODRIGUEZ

32. During the investigation, law enforcement intercepted numerous telephonic communications over the WILSON 3244 Facility between WILSON and RODRIGUEZ. These communications revealed, among other things, that WILSON distributed significant quantities of cocaine and crack cocaine to RODRIGUEZ for re-distribution to others. Some of the communications reflecting WILSON and RODRIGUEZ’s drug-trafficking activities are summarized in paragraphs 33 through 36, below.

33. On or about May 23, 2022, WILSON sent a text message to RODRIGUEZ that said, “I got a nickel for you my guy”—meaning that WILSON

had five grams of cocaine or crack cocaine to sell to RODRIGUEZ. RODRIGUEZ responded, "Copy dat[.]"

34. On or about June 4, 2022, WILSON called RODRIGUEZ. During the call, WILSON told RODRIGUEZ about the vacation that he (WILSON) was taking at that time. In response, RODRIGUEZ said, "Hey I, Hey I tip my hat to you nigga. You look like you doin. I tip my hat, bitch, I swear. Don't worry, we gon set some shit up, bitch." WILSON responded, "Come on, man bitch I'm waiting for you." RODRIGUEZ replied, "We gon set some shit up. Don't even worry about it Nef." WILSON replied, "I know this some motivation, I know this would. If nothing else motivates you, this would," referring to WILSON's vacation. RODRIGUEZ then said, "You fuckin right. Yup, that's that's all I needed. Word is bond. Check my boy out here lookin like somebody."

35. On or about June 7, 2022, RODRIGUEZ called WILSON to warn him about police activity in the area: "I'm just letting you all know in case they come around." WILSON responded, "Alright my nigga good looking out my boy."

36. On or about June 28, 2022, RODRIGUEZ sent a text message to WILSON that said, "U ready for me my boy ?" WILSON responded, "Yup[.]" RODRIGUEZ then asked, "20 min sound good[?]" WILSON responded, "Ok[.]" Shortly thereafter, RODRIGUEZ sent a text message to WILSON that said, "On my way[.]" Shortly thereafter, law enforcement observed WILSON enter the front passenger's-side door of RODRIGUEZ's vehicle at a location in the GCL area. Law enforcement observed WILSON approximately one minute later departing the area. Shortly thereafter, law enforcement conducted a motor vehicle stop of RODRIGUEZ's vehicle, searched RODRIGUEZ's person, and recovered approximately 81 grams of suspected crack cocaine and approximately 122 grams of suspected cocaine.

BOWMAN

37. During the investigation, law enforcement intercepted numerous communications over the WILSON 2785 Facility between WILSON and BOWMAN that revealed, among other things, that WILSON distributed heroin to BOWMAN for re-distribution to others. Some of the communications relating to WILSON and BOWMAN's drug-trafficking activities are summarized in paragraphs 38 through 40, below.

38. On or about May 26, 2022, BOWMAN called WILSON and asked WILSON if he was "selling t-shirts"—meaning "bricks" of heroin.¹ WILSON

¹ Based on my training and experience, I know that a "brick" of heroin or fentanyl typically contains approximately 50 smaller, individually packaged glassine envelopes or baggies containing heroin, fentanyl, or a mixture of heroin and fentanyl, which are bundled together in "bundles" of approximately

responded, “yeah, I’m present.” BOWMAN responded that he “need[ed] five of them”—meaning he needed five bricks of heroin. Wilson responded, “no problem.”

39. On or about June 27, 2022, BOWMAN called WILSON and again ordered “5 t-shirts”—meaning five bricks of heroin. WILSON responded, “Alright no problem.”

40. On or about July 5, 2022, BOWMAN called WILSON and told him to give him “4 and 1.” WILSON responded, “Alright.” Approximately two hours later, WILSON called BOWMAN and told him to meet him in the park—meaning Garfield Park. Shortly thereafter, law enforcement observed BOWMAN arrive at and enter Garfield Park and then WILSON called BOWMAN and asked him, “Where you at?” BOWMAN responded, “Looking right at you. I’m in the park, bro.” WILSON replied, “Oh I see you.” Shortly thereafter, both WILSON and BOWMAN exited Garfield Park. Thereafter, law enforcement arrested BOWMAN on an unrelated outstanding arrest warrant, searched BOWMAN, and recovered from his person 500 wax folds of suspected heroin (equivalent to approximately ten bricks); 50 wax folds of suspected heroin (approximately one brick) of suspected heroin; a red bottle containing four wax folds containing suspected heroin; and a clear bottle containing approximately four grams of suspected crack cocaine.

McKINES AND MICHAEL WILLIAMS

41. During the investigation, law enforcement intercepted numerous communications over the WILSON 3244 Facility between WILSON and McKINES that revealed, among other things, that WILSON distributed significant quantities of crack cocaine to McKINES for re-distribution to others. Additionally, law enforcement intercepted numerous communications over the WILSON 3244 Facility between WILSON and MICHAEL WILLIAMS that revealed, among other things, that WILSON distributed significant quantities of cocaine-based narcotics to MICHAEL WILLIAMS for re-distribution to others. Some of the communications relating to WILSON, McKINES, and MICHAEL

10 envelopes or baggies, which are then wrapped and taped to form a small package. A brick typically contains a total of approximately one gram of heroin. Additionally, I know that the packaging in which heroin and fentanyl is sold often is identified by an ink “stamp.” Heroin and fentanyl dealers often use these stamps to establish a brand or marketing for the source of that drug. Sales by different individuals of packages of heroin or fentanyl bearing the same stamp indicate coordination amongst those individuals and a common source of the same heroin or fentanyl supply.

WILLIAMS's unlawful drug-trafficking activities are summarized in paragraphs 42 through 46, below.

42. On or about June 9, 2022, McKINES called WILSON to let him know that he was "headed down [WILSON's] spot." WILSON responded, "Alright cool. What's the number so I be ready for you my boy?" McKINES replied, "Umm, 29"—meaning 29 grams of crack cocaine. WILSON answered, "Alright." Shortly thereafter, McKINES called WILSON again and said, "Hey look if it ain't too late, don't worry about it, but I'd like 33. [UI] my people's just hit me couple minutes ago"—meaning that McKINES needed four additional grams of crack cocaine from WILSON to redistribute to his buyers. WILSON responded, "Alright." Shortly afterward, McKINES called WILSON and said, "I'm here." WILSON responded, "Alright." Thereafter, law enforcement conducted a motor vehicle stop of McKINES's vehicle, searched McKINES's person, and recovered approximately 34 grams of suspected crack cocaine. Law enforcement arrested McKINES, and he was thereafter released pending further proceedings.

43. On or about July 1, 2022, McKINES called WILSON. During that call, McKINES said to WILSON, "Hey yo um, listen do 15, meaning 15 grams of crack cocaine. I'm gonna owe you the 9-5, I made a move last night so I've been out all fuckin' night, all morning. So I'll still need that. Alright. Just let me know when I'm out." WILSON responded, "Alright." Shortly thereafter, WILSON called McKINES to coordinate a meeting time and place for WILSON to give McKINES the 15 grams of crack cocaine.

44. Later that day, WILSON exchanged a series of text messages with MICHAEL WILLIAMS, during which MICHAEL WILLIAMS ordered from WILSON a "girl dime"—meaning ten grams of cocaine. WILSON and MICHAEL WILLIAMS subsequently arranged to meet each other.

45. Shortly thereafter, WILSON called McKINES and asked McKINES if the drugs he sold him were "hard" (meaning crack cocaine) or "soft" (meaning powder cocaine). McKINES told WILSON, "You gave me soft, Vill." WILSON responded, "My fucking God." During the conversation, McKINES said, "I gotta run it back to you then because I [was] about to cook it"—meaning that McKINES was going to cook the cocaine WILSON had mistakenly sold him to make crack cocaine to sell to his buyers. WILSON then told McKINES that he was going to "have [McKINES] take [the cocaine] to [his] man because that's where it's supposed to go." McKINES agreed. WILSON then called MICHAEL WILLIAMS and said, "Yo, listen right, bitch, my man about to come switch it because, bitch, I gave you all the wrong shit . . . He's gonna be in the white minivan, I already know, Ice. Chill out, Ice. You ain't gotta explain shit, listen, all I need you to do is just listen. He's gonna be in the white minivan. I'll call you when he out front. That's it. You ain't gotta say nothing else or nothing alright?" MICHAEL WILLIAMS responded, "Yes sir." Shortly thereafter, WILSON called MICHAEL WILLIAMS again and told him that McKINES would be

approaching MICHAEL WILLIAMS soon and to look out for “a bald headed, brown skin nigga, in a white minivan. It’s got PA plates on it.” Later during that call, WILSON confirmed that McKINES and MICHAEL WILLIAMS had exchanged the supplies of cocaine and crack cocaine that WILSON had mistakenly given the other.

46. On or about July 3, 2022, MICHAEL WILLIAMS sent a text message to WILSON that said, “I need to talk to you call me when you get time[.]” Less than one minute later, WILSON called MICHAEL WILLIAMS. During that call, MICHAEL WILLIAMS said that he needed “like five of those other things tomorrow, man.” WILSON asked, “Uh, dog food?”—meaning heroin. MICHAEL WILLIAMS responded, “No, uh, no, no, it’s, uh, the all ready, the put together”—meaning five grams of crack cocaine. WILSON replied, “Alright, alright, alright, alright. I heard you.”

MOORE

47. During the investigation, law enforcement intercepted numerous communications over the WILSON 3244 Facility between WILSON and MOORE that revealed, among other things, that WILSON distributed significant quantities of heroin and cocaine to MOORE for re-distribution to others. Some of the communications relating to WILSON and MOORE’s drug-trafficking activities are summarized in paragraphs 48 through 52, below.

48. On or about May 22, 2022, MOORE called WILSON to tell him that MOORE’s home had been burglarized, that he “know[s] it was a fucking fiend that broke into [his] fucking crib[,]” and that he needed “fresh of, uh, of everything from [WILSON], probably in the am or later on today if [WILSON was] available.” Later that day, WILSON sent a text message to MOORE that read, “You want to come around the corner and grab that now[?]” WILSON then called MOORE and said, “You feel like swinging round the corner and grabbin?” MOORE agreed to meet WILSON. Shortly thereafter, MOORE sent a text message to WILSON that said, “On my way!” A couple of minutes later, MOORE called WILSON to tell WILSON that he was outside “by the parking lot.” Shortly thereafter, law enforcement observed WILSON walk from the vicinity of the Grand Court Villas carrying a brown cardboard box and approach a black Lincoln Navigator, registered to MOORE, parked on the street near the Grand Court Villas parking lot. When law enforcement next observed WILSON approximately one minute later, he was no longer carrying the cardboard box.

49. On or about June 7, 2022, WILSON exchanged a series of text messages with MOORE. During that conversation, MOORE sent WILSON a text message that said, “Ima need another order H”—meaning heroin.

50. On or about June 23, 2022, WILSON and MOORE exchanged the following text messages, during which WILSON offered to front narcotics to MOORE and that MOORE could pay WILSON for those narcotics after he re-distributed them and had enough money:

Sender	Recipient	Message
MOORE	WILSON	Unk ima need 134 & 200 ima pay for 134. I'm good on the other thing for now.
WILSON	MOORE	Ok 134 & 200?
MOORE	WILSON	Yea 134 I'm paying 200 I'm borrowing
WILSON	MOORE	Ok np give about 30 minutes
MOORE	WILSON	Bet
WILSON	MOORE	I had 400 and 200 4U
MOORE	WILSON	Got damn. All I got is 134 worth unk but if you want me to take that I accept the Challenge lol might take little bit though!!! Up to you
WILSON	MOORE	Ok take ya time I never rush you talk to you at the end of next month or the beginning of August
MOORE	WILSON	Bet

51. Shortly after MOORE sent the last text message in the above exchange, WILSON called MOORE and told him he was "out front yo." Approximately five minutes later, WILSON and MOORE exchanged the following series of text messages, during which WILSON and MOORE discussed the quantities of narcotics that WILSON had just fronted to MOORE, namely,

400 bricks of heroin and 200 grams of crack cocaine, and the amount of money that MOORE owed WILSON as a result:

Sender	Recipient	Message
MOORE	WILSON	Bet so I owe you 20 bout put this in the notes
WILSON	MOORE	Nah you at 27600 $400 \times 75 = 30000^2$ $200 \times 33 = 6600^3$ $36600 - 9000 =$ 27600^4
MOORE	WILSON	I gave you 10 ⁵ unk in I just emptied the bag didn't know you gave the other lol. In for that we not at 28 no more it went back up?
WILSON	MOORE	Nah my bad you right I'm thinking soft ⁶ it's 56 ⁷ not 66 ⁸ we @ 26600 ⁹
MOORE	WILSON	Bet say no more I was about to say damn I then missed the wave lol.

52. On or about June 26, 2022, MOORE called WILSON and said, “Yo Unc, I don’t know, umm, what’s up with, umm, the batch of blue, but everybody hates it”—meaning that MOORE’s buyers were dissatisfied with the heroin that WILSON had supplied him that bore a blue-colored stamp. MOORE then explained that his buyers “love[d]” “the original one that I just had from you last time.” WILSON responded, “Oh yeah?” and eventually told MOORE,

² In context, 400 bricks of heroin priced at \$75 per brick, for a total of \$30,000.

³ In context, 200 grams of crack cocaine priced at \$33 per gram, for a total of \$6,600.

⁴ In context, $\$36,600 - \$9,000 = \$27,600$ that MOORE owed to WILSON.

⁵ In context, \$10,000.

⁶ In context, powder cocaine instead of crack cocaine.

⁷ In context, \$5,600.

⁸ In context, \$6,600.

⁹ In context, \$26,600 that MOORE owed to WILSON.

“see if you have any, uhh, motherfucking reactions from any other color and then let me know, right, and then I’ll just change it up for you.” MOORE responded, “Alright, bet, yeah, I’m about to swap some people out now, I’ll see what they say.” The next day, WILSON sent a text message to MOORE that said, “No word yet[.]” MOORE responded, “It was just the blue unk no complaints about anything else” and then said, “I [g]ave them the green they like it[.]” WILSON replied, “Ok I’ll swap it out[.]” MOORE responded, “Bet[.]”

FARMER

53. During the investigation, law enforcement intercepted communications over the WILSON 3244 Facility between WILSON and FARMER that revealed, among other things, that WILSON distributed heroin to FARMER. Some of the communications relating to WILSON and FARMER’s drug-trafficking activities are summarized in paragraphs 54 and 55, below.

54. On or about June 7, 2022, WILSON called FARMER. During the call, WILSON asked FARMER, “What’s the number so I can be ready for ya?” FARMER responded, “Oh, oh, ten of them things”—meaning ten bricks of heroin. WILSON then asked FARMER, “You want to meet me out the way [referring to a location in the GCL area]?” FARMER responded, “Yeah, thata be perfect, I’m on my way home now.” WILSON then told FARMER to “pull on Ward,” referring to Ward Avenue in Trenton. FARMER then told WILSON that he would meet him in less than ten minutes.

55. On or about July 12, 2022, FARMER called WILSON and said, “I can grab like 23 off you, but, umm, I still got stuff left over so let me hold off on grabbing that, what you was going to match me cause I don’t know” —meaning FARMER wanted to buy 23 bricks of heroin from WILSON but did not want to take what WILSON had previously offered to front to FARMER. WILSON agreed. A short time later, FARMER called WILSON to ask WILSON if he was “out south [referring to the Grand Court Villas] or . . . out the way [referring to another location in the GCL area]?” WILSON responded, “Out south. Out the way hot as hell.” FARMER then told WILSON that he would meet him in about two or three minutes. FARMER then asked if the price for the 23 bricks was “1840”—meaning \$1,840. WILSON answered affirmatively. Shortly thereafter, law enforcement observed FARMER park in front of the Grand Court Villas. After FARMER parked, law enforcement observed WILSON walk from the vicinity of the Grand Court Villas toward the passenger’s-side door of the vehicle that FARMER was driving. Immediately thereafter, WILSON walked back toward the Grand Court Villas, and FARMER departed the area in his vehicle.

EDWARDS

56. During the investigation, law enforcement intercepted communications over the WILSON 2785 Facility between WILSON and EDWARDS that revealed, among other things, that WILSON distributed significant quantities of cocaine, crack cocaine, and heroin to EDWARDS for redistribution to others. Some of the communications relating to WILSON and EDWARDS's drug-trafficking activities are summarized in paragraphs 57 through 59, below.

57. On or about May 12, 2022, EDWARDS called WILSON. During that call, EDWARDS said that he "need[ed] three of them somethings." WILSON responded that EDWARDS "gotta see [him] in the morning," that he is "waiting for it to come down," but that he "should definitely have it in the A.M. though." A couple of minutes later, EDWARDS called WILSON again and said that "[his] guy" wants "it the other way," later clarifying that EDWARDS's buyer wanted it "hard"—meaning the buyer wanted crack cocaine.

58. On or about May 13, 2022, EDWARDS called WILSON. During that call, WILSON said, "I might got an idea for ya, I'm gonna get you something to keep you away from me for a minute, man"—meaning that WILSON was going to sell and/or front narcotics to EDWARDS so that EDWARDS could limit the frequency with which he needed to obtain additional supplies of narcotics from WILSON. EDWARDS laughed and then responded, "Alright, say no more. Where you at?" WILSON then told EDWARDS that "as soon as he . . . get[s] to where [he's] going, [he's] gonna call [EDWARDS]."

59. On or about June 29, 2022, WILSON and EDWARDS exchanged a series of text messages, during which EDWARDS sent a text message that said, "My guy drop me like 25 or 50 of them"—meaning 25 or 50 bricks of heroin. WILSON responded, "Okay," and then subsequently told EDWARDS to meet him "[o]ut south in the back of the building[.]" referring to the Grand Court Villas. Shortly thereafter, EDWARDS called WILSON and said, "Hey yo, let me get five of the hard things too"—meaning five grams of crack cocaine. WILSON responded, "Alright" and then told EDWARDS to meet him in the Grand Court Villas parking garage. Soon afterward, law enforcement observed EDWARDS's vehicle enter the Grand Court Villas parking garage. EDWARDS then sent a text message to WILSON that said, "Here" and then a second text message that said, "Down here[.]" Approximately one minute later, EDWARDS called WILSON and said, "I think I am down here and you said in the garage right, right behind the shit?" WILSON confirmed. Approximately five minutes later, law enforcement observed EDWARDS's vehicle exit the Grand Court Villas parking garage.