
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	SUPERSEDING CRIMINAL
v.	:	COMPLAINT
	:	
RODNEY BROADWAY,	:	Hon. André M. Espinosa
a/k/a "Banks,"	:	
PARISH GEORGE,	:	Mag. No. 23-11017
a/k/a "P-Money," and	:	
DEJAHN INGRAM,	:	
a/k/a "Fresh"	:	

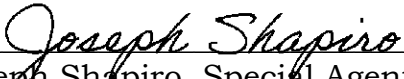
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations, and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.




Joseph Shapiro, Special Agent
Homeland Security Investigations
U.S Department of Homeland
Security

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

JANUARY 20, 2023
DATE

DISTRICT OF NEW JERSEY
COUNTY AND STATE

Honorable André M. Espinosa
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Distribute Cocaine)

From at least as early as in or around October 2022 through in or around January 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

RODNEY BROADWAY,
a/k/a "Banks,"
PARISH GEORGE,
a/k/a "P-Money," and
DEJAHN INGRAM,
a/k/a "Fresh,"

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II 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.

Count Two

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

On or about January 19, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

DEJAHN INGRAM,
a/k/a “Fresh,”

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition—namely, a .40 caliber Smith & Wesson M&P Shield, bearing serial number JFP0064, loaded with eight rounds of ammunition, and the firearm and ammunition were in and affecting commerce.

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

Count Three

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

On or about January 19, 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

PARISH GEORGE,
a/k/a “P-Money,”

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition—namely, a .40 caliber Glock 23 handgun, bearing serial number RVX813, loaded with ten rounds of ammunition, and the firearm and ammunition were in and affecting commerce.

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

Count Four
(Unlawful Possession of Ammunition by a Convicted Felon)

On or about January 19, 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

RODNEY BROADWAY,
a/k/a "Banks,"

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess an extended magazine, loaded with approximately twenty-four rounds of ammunition, which rounds of ammunition were in and affecting commerce.

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

Count Five
(Possession with Intent to Distribute Cocaine)

On or about January 19, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

PARISH GEORGE,
a/k/a "P-Money,"

knowingly and intentionally did possess with the intent to distribute a quantity of 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)(C).

Count Six
(Possession with Intent to Distribute Cocaine)

On or about January 19, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

RODNEY BROADWAY,
a/k/a "Banks," and
PARISH GEORGE,
a/k/a "P-Money,"

knowingly and intentionally did possess with the intent to distribute a quantity of 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)(C).

ATTACHMENT B

I, Joseph Shapiro, have been a Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations since 2019. I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge and information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information relating to the defendants; (c) my review of business records, other documents, and evidence obtained through court orders, subpoenas, and other sources; and (d) my review of audio and video recordings and photographs. Because this Criminal Complaint is being 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. All dates and times are approximate.

THE INVESTIGATION

1. For several months, law enforcement has investigated the drug trafficking activities of Rodney Broadway, a/k/a “Banks” (“Broadway”), Parish George, a/k/a “P-Money” (“George”), Dejahn Ingram, a/k/a “Fresh” (“Ingram”), and others (collectively, the “Defendants”), all of whom are associated with the neighborhood street gang that operates in and around the Salem Lafayette Apartments in Jersey City, New Jersey. The investigation has included fixed and mobile surveillance, numerous recorded controlled purchases of cocaine, the use of Confidential Informants (“CIs”), the use of Confidential Sources (“CSs”), and an analysis of telephone records showing interactions between and among the co-conspirators.

2. From these various investigatory methods, law enforcement officers have determined that the Defendants conspired to distribute, and did in fact distribute, large amounts of cocaine in and around Jersey City and Newark, New Jersey. Fixed and mobile surveillance revealed that the Defendants used numerous vehicles and stash locations to store narcotics, narcotics proceeds, and narcotics paraphernalia. Moreover, telephone records revealed frequent and continuous contacts between the conspirators during the time period of the conspiracy.

3. During the course of the investigation, law enforcement conducted approximately ten controlled purchases of cocaine from Broadway, George, and Ingram, which resulted in the seizure of more than 100 grams of cocaine.

4. As a result of the investigation, law enforcement executed several search warrants and effectuated arrests of Broadway, George, and Ingram on or about January 19, 2023, the results of which were as follows:

- a. At the time of Ingram's arrest, Ingram possessed a .40 caliber Smith & Wesson M&P Shield, bearing serial number JFP0064, loaded with eight rounds of ammunition, which was located in Ingram's jacket pocket.
- b. At the time of George's arrest, George was located in a Dodge Charger. Upon observing law enforcement approach, Broadway reached to the backseat of the Charger. The subsequent search of the Charger revealed a .40 caliber Glock 23 handgun, bearing serial number RVX813, loaded with ten rounds of ammunition in the location where law enforcement had observed Broadway reach. The search also revealed a significant quantity of marijuana packaged for distribution, as well as drug paraphernalia.
- c. At the time of Broadway's arrest, Broadway was located in a Chrysler 300. The subsequent search of the Chrysler revealed a quantity of suspected heroin packaged for distribution, as well as drug paraphernalia.
- d. The search of a residence on Stevens Avenue in Jersey City, New Jersey revealed an extended magazine containing twenty-four rounds of ammunition, a money counter, and indicia of Broadway's association with that residence. After being advised of, and waiving, his *Miranda* rights, Broadway admitted his possession of the extended magazine, which was loaded with twenty-four rounds of ammunition.
- e. The search of a residence on Kennedy Boulevard in Jersey City, New Jersey revealed eighteen rounds of ammunition, a scale containing a white powdery substance consistent with cocaine, and indicia of Ingram's association with that residence.
- f. The search of a residence on Bayview Avenue in Jersey City, New Jersey revealed a large quantity of cocaine, a kilo press, and indicia of George's association with that residence.
- g. The search of a residence on Bloomfield Avenue in Newark, New Jersey revealed a large quantity of cocaine; 181 rounds of ammunition; a kilo press; six firearm boxes, the serial numbers for which match at least one stolen firearm; and indicia of both Broadway's and George's association with that residence.

5. The firearms and ammunition that were recovered during the arrests and searches enumerated in paragraph 4 above were manufactured outside of New Jersey such that they were in and affected commerce prior to their possession in New Jersey on or about January 19, 2023.

6. As of January 19, 2023, Ingram had at least one prior felony conviction, including a conviction in the Superior Court of New Jersey, Hudson County, on or about July 25, 2014, for manufacturing and distributing a controlled dangerous substance, in violation of N.J.S.A. 2C:35-5(A)(1), which is an offense punishable by a term of imprisonment exceeding one year.

7. As of January 19, 2023, George had at least one prior felony conviction, including a conviction in the United States District Court for the District of New Jersey, on or about June 8, 2016, for distribution and possession with intent to distribute heroin, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), which is an offense punishable by a term of imprisonment exceeding one year.

8. As of January 19, 2023, Broadway had at least one prior felony conviction, including a conviction in the Superior Court of New Jersey, Hudson County, on or about December 7, 2018, for aggravated assault, in violation of N.J.S.A. 2C:12-1(B)(4), which is an offense punishable by a term of imprisonment exceeding one year.