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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	The Honorable Mark Falk
KEITH BOWENS,	:	
a/k/a "Weefy,"	:	
JEROME LEWIS,	:	Mag. No. 15-3576
a/k/a "Pete,"	:	
TARENCE BURKS,	:	
a/k/a "Barrack,"	:	<b><u>FILED UNDER SEAL</u></b>
GEORGE BELL,	:	
a/k/a "Nino," and	:	
TEQUAN T. SMALL	:	

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 Task Force Officer with the Drug Enforcement Administration and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Ramon Candelaria  
Task Force Officer  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,  
May 12, 2015 at Newark, New Jersey

THE HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**  
**(Conspiracy to Distribute Heroin)**

From in or about July 2014 through in or about December 2014, in Essex County, in the District of New Jersey and elsewhere, defendants

KEITH BOWENS,  
a/k/a "Weefy,"  
JEROME LEWIS,  
a/k/a "Pete,"  
TARENCE BURKS,  
a/k/a "Barrack,"  
GEORGE BELL,  
a/k/a "Nino," and  
TEQUAN T. SMALL

did knowingly and intentionally conspire with each other and others to distribute and 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, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

## **ATTACHMENT B**

I, Ramon Candelaria, have been a Task Force Officer with the Drug Enforcement Administration ("DEA") since 2013, and a detective with the Newark Police Department since 2008. 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 on 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, photographs, and court-authorized wiretaps. 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. Where the content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part, and the content of statements and meetings are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared by monitors. All dates and times are approximate.

### **BACKGROUND**

1. Law enforcement is presently engaged in an investigation that targets a heroin-trafficking organization (identified herein as the "Williams DTO") that supplies heroin at the wholesale- and retail-level in and around Newark, New Jersey. Over the course of the investigation, the United States District Court, District of New Jersey, entered orders authorizing the interception of communications that occurred over numerous cell phones used by a member of the Williams DTO, and associates of the Williams DTO.

2. Based on court-authorized wiretaps, physical surveillance, and other investigative techniques, law enforcement uncovered the operational structure and inner workings of this heroin-trafficking organization and the method and means by which it carried out the heroin-trafficking conspiracy.

3. The defendants charged herein were involved in the Williams DTO that supplied heroin to drug traffickers located in areas of northern New Jersey, including but not limited to Newark and Jersey City.

### **THE DEFENDANTS & THEIR ROLES**

4. At all times relevant to this Criminal Complaint:

a. Coconspirator Toma Williams, a/k/a "T-Dubbs" (hereinafter, "Williams"), charged in a separate federal criminal complaint, oversaw and directed the Williams DTO's heroin distribution operation.<sup>1</sup>

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<sup>1</sup> Coconspirator Williams was charged by federal criminal complaint, filed on or about October 4, 2014, under Magistrate Number 14-7231, with distribution, and possession with

b. Defendant Keith Bowens, a/k/a “Weefy,” a/k/a “Weef” (hereinafter, “Bowens”) was an associate of Williams and distributed heroin on behalf of the Williams DTO.

c. Defendant Jerome Lewis, a/k/a “Pete” (hereinafter, “Lewis”) was an associate of Williams and distributed heroin on behalf of the Williams DTO.

d. Defendant Tarence Burks, a/k/a “Barrack” (hereinafter, “Burks”) was an associate of Williams and distributed heroin on behalf of the Williams DTO.

e. Defendant George Bell, a/k/a “Nino” (hereinafter, “Bell”) and Tequan T. Small (hereinafter, “Small”) were associates of Williams and Bowens and distributed heroin on behalf of the Williams DTO.

### **THE INVESTIGATION**

5. Between in or about May 2014 and in or about April 2015, the United States District Court, District of New Jersey, entered orders authorizing the interception of communications occurring over numerous cell phones used by a member of the Williams DTO and associates of the Williams DTO. Intercepted calls and text messages, some of which are described below, show that the Williams DTO supplied heroin to other drug traffickers in the Newark and Jersey City, New Jersey, area.

6. On or about August 25, 2014, at approximately 3:57 p.m., Williams used the Williams 9872 Phone to speak with a coconspirator (hereinafter, “Coconspirator-1”). During that conversation, Coconspirator-1 and Williams had the following conversation:

Williams: They here?

CC-1: Yeah, my other peoples is around.

Williams: What they talking about? They aight?

CC-1: Thirty dollars.

Williams: Thirty?

CC-1: Yeah.

Williams: Aight, give me a minute. I’m a bout to get up now and make the call.

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intent to distribute, one kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a) and (b)(1)(A).

Based on the content of this conversation and other intercepted communications, Coconspirator-1 told Williams that he (Coconspirator-1) wanted to purchase 30 bricks of heroin from Williams.<sup>2</sup> Williams responded that he (Williams) would make a call to obtain the 30 bricks of heroin.

7. Less than thirty minutes later, at approximately 4:18 p.m., Williams used the Williams 9872 Phone to speak with Lewis, who was using a cell phone with a telephone number ending in 9772 (hereinafter, the "Lewis 9772 Phone"). During that conversation, Williams and Lewis had the following exchange:

Lewis: Yo.

Williams: Yo, you started?

Lewis: Yeah.

Williams: I need you to put thirty when you get a chance.

Lewis: What happened?

Williams: I need thirty of them for-- when you get a chance.

Lewis: Aight.

Based on the content of this conversation and other intercepted communications, Williams told Lewis that he (Williams) needed Lewis to package 30 bricks of heroin.

8. Shortly thereafter, at approximately 4:35 p.m., Williams used the Williams 9872 Phone to speak with Coconspirator-1. Williams asked Coconspirator-1, "That's definitely a go? Get it read-- they need it or no?" Coconspirator-1 replied, "Yeah, he need it. He calling me for it now." When Williams asked, "So they waiting on you," Coconspirator-1 responded, "Yeah." Based on the content of this conversation and other intercepted communications, Williams and Coconspirator-1 were discussing the 30 brick transaction. Later that night, at approximately 9:46 p.m., Williams and Coconspirator-1 spoke again and Coconspirator-1 told Williams, "C'mon man, this n\*\*\*\*'s been waiting all day son." Williams replied, "I know, I know. I got you." Intercepted calls indicate that, at approximately 10:13 p.m., Williams and Coconspirator-1 met to engage in the narcotics transaction.

9. On or about August 25, 2014, at approximately 8:51 p.m., Williams, using a cell phone with a telephone number ending in 9872 (hereinafter, the "Williams 9872 Phone"), spoke with Bowens, who was using a cell phone with a telephone number ending in 3509 (hereinafter,

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<sup>2</sup> Based on my training and experience, a "brick" of heroin refers to a package of heroin containing 50 glassine or wax-paper envelopes containing individual hits of heroin. A brick of heroin contains 5 "bundles" of heroin, each of which, in turn, constitute 10 envelopes or "decks" of heroin.

the "Bowens 3509 Phone"). During that conversation, Williams and Bowens had the following exchange:

Bowens: I need you to bring the guy the ten.

Williams: Bring what?

Bowens: Bring the guy the ten.

Thereafter, Williams asked Bowens, "What guy," and Bowens replied, "Uh, on Woodlawn." Based on the content of this conversation and other intercepted communications, Bowens and Williams were discussing delivering 10 bricks of heroin to a customer.

10. Later that night, at approximately 10:45 p.m., Williams used the Williams 9872 Phone to speak with Bowens, who was using the Bowens 3509 Phone. In that conversation, Bowens warned Williams, "Look, just come see him in the morning, cause there's police out there." Bowens further stated, "You gonna get this n\*\*\*\* knocked off just sitting on his porch." Based on the content of this conversation and other intercepted communications, Bowens was warning Williams not to deliver the 10 bricks because of police presence in the area, otherwise Williams might cause the customer to be arrested ("knocked off").

11. On or about August 26, 2014, at approximately 11:46 p.m., Williams used the Williams 9872 Phone to speak with Lewis, who was using a cell phone with a telephone number ending in 9772 (hereinafter, the "Lewis 9772 Phone"). During that conversation, Williams and Lewis had the following exchange:

Lewis: Where you at?

Williams: In Jersey City. Where you at?

Lewis: I'm coming to Jersey City. You ain't got em' done already?

Williams: I got Gunner right here.

As the conversation continued, the following exchange took place:

Lewis: Hey brah, you and Gunner got them made up already, or you want me to do it?

Williams: Where you at?

Lewis: I'm on my way to Jersey City.

Williams: Aight, I'm out here.

Based on the content of this conversation and other intercepted communications, Lewis asked Williams whether he (Williams) and a coconspirator identified as "Gunner" had finished preparing and packaging heroin for distribution.

12. On or about September 2, 2014, at approximately 9:55 p.m., Williams, using the Williams 9872 Phone, placed a call to Small, who was using a cell phone with a telephone number ending in 6399 (hereinafter, the "Small 6399 Phone"). During that conversation, Small reported to Williams, "Aight, umm, I only bust one sale." When Williams replied, "Dag, how much was it," Small told Williams that "[i]t was for 130." Based on the content of this conversation, and other intercepted communications, Small told Williams that he (Small) had sold 1 brick of heroin for \$130.

13. On or about September 4, 2014, at approximately 11:43 a.m., Williams, using the Williams 9872 Phone, received a call from Bowens, who was using the Bowens 3509 Phone. During that conversation, Bowens told Williams, "I need to see you in ten minutes. I got some guys, man." Williams replied, "I'll be right there in ten minutes." Shortly thereafter, at approximately 12:00 p.m., Williams received another call from Bowens on the same telephone facilities. Bowens told Williams, "Yeah, you better hurry up. I'm telling you, you gonna make me miss the sale man. For real, I'm being for real. If you not there just tell me so I could go just do it myself. For real." Williams told Bowens, "I'm here Weefy." Based on the content of this conversation, and other intercepted communications, Bowens informed Williams that he (Bowens) had customers who wanted to purchase bricks of heroin, and Williams told Bowens that he (Williams) would be there in ten minutes to deliver the heroin. When Williams took longer than ten minutes, Bowens told Williams that he (Williams) was taking too long and that the customer might leave without consummating the sale.

14. On or about September 19, 2014, at approximately 12:17 p.m., Williams, using the Williams 9872 Phone, placed a call to Small, who was using the Small 6399 Phone. During that call, Small and Williams had the following conversation:

Small: I'm done with that, you heard?

Williams: How much money you got for me?

Small: It's gonna be 240 and I got three loose bags. I already let Weefy know already, he said, "Aight." I had-- I was giving him money during the week, twenty dollars here, ten dollars here.

Williams: So you got 240 on you?

Small: Yeah and I got three loose bags.

Williams: Aight, I'm about to bring that over to you right now.

Small: Aight.

Williams: I'm trying to see-- how much you want me to bring you?

Small: I don't know, he said something heavy.

Williams: Aight, let me call him.

Based on the content of this conversation, and other intercepted communications, Small reported to Williams that he (Small) had sold his supply of heroin and that he had \$240 and three loose bags of heroin for Williams. Small told Williams that he (Small) had told Bowens ("Weefy") that he had finished selling his supply of heroin. Finally, Williams told Small that he (Williams) would call Bowens to ask Bowens how many bricks of heroin Williams should provide to Small.

15. Shortly thereafter, at approximately 12:46 p.m., Williams, using the Williams 9872 Phone, placed a call to Bowens, who was using the Bowens 3509 Phone. During that conversation, Williams asked Bowens, "What you want me to give him now? I'm about to meet him" (asking how many bricks of heroin Williams should provide to Small). Bowens replied, "5-0" (meaning 50 bricks of heroin).

16. On or about September 22, 2014, at approximately 2:10 p.m., Williams, using the Williams 9872 Phone, placed a call to Small, who was using the Small 6399 Phone. During the course of that conversation, Small told Williams, I'm still trying to do what I do. I had sold like seven or eight" and, then, "I'mma try to have at least like, at least \$1,000 for you today, alright?" Williams replied, "Aight, call me." Based on the content of this conversation and other intercepted communications, Small told Williams that he had sold 7 or 8 bricks of heroin and would have \$1,000 in United States currency to provide to Williams as a result of those narcotics sales.

17. On or about September 24, 2014, at approximately 7:53 p.m., several plain clothes police officers with the Jersey City Police Department were conducting surveillance in the area of Yale Avenue in Jersey City, New Jersey. Officers observed Bell get out of his vehicle, look around nervously, and make a call on his cell phone. Shortly after Bell made this call, Small walked over to Bell, and the two men greeted each other. After a brief conversation, Small began walking away, while Bell removed what appeared to be U.S. currency from his pocket and started to count it. While Small was crossing the street, he (Small) looked in the direction of the officers, said something to Bell, and quickly began walking back in Bell's direction. Bell quickly put the U.S. currency back in his pocket. After officers approached the two men and identified themselves as law enforcement, Small identified for the officers the nearby residence in which he lived. Officers then received consent to search that residence from one of the residents. In the bushes located in the front yard of the residence, officers found a cigarette pack containing 30 decks of heroin. Inside the residence, officers found 29 bricks of a substance that subsequently field-tested positive for the presence of heroin. Officers then arrested both Small and Bell.

18. Approximately two hours later, at approximately 10:03 p.m., Williams, using the Williams 9872 Phone, received a call from an individual (hereinafter, "Individual-1"). During



that conversation, Individual-1 told Williams, "You know that Tequan locked up right?" (referring to Small). As the conversation continued, Williams asked, "What they lock him up for, what they lock him up for?" Individual-1 stated, "He said it was thirty." When Williams asked, "Thirty what," Individual-1 replied, "I guess thirty bricks, I don't know." Williams responded, "Oh shit, damn. Aight, let me call Weefy" (referring to Bowens). Based on the content of this conversation and other intercepted communications, Williams learned that Small had been arrested for possession of 30 bricks of heroin.

19. On or about September 25, 2014, at approximately 1:47 p.m., Williams, using the Williams 9872 Phone, placed a call to Burks, who was using a cell phone with a telephone number ending in 0657 (hereinafter, the "Burks 0657 Phone"). During the course of that conversation, Williams and Burks had the following exchange:

Williams: How you do yesterday?

Burks: I made a couple.

Williams: Get five-hundred yesterday?

Burks: Huh?

Williams: Get five hundred?

Burks: No, hell no.

Williams: Huh?

Burks: No, man, like three. Like a couple, like, only like-- This shit crazy, man. Everybody, everybody owe some other shit, man.

Based on the content of this conversation, and other intercepted communications, Williams asked Burks how narcotics sales were the previous day, and Burks told Williams that he (Burks) had sold "a couple" of bricks of heroin. As the conversation continued, Williams and Burks had the following discussion:

Williams: Yeah. My man just knocked off yesterday.

Burks: Huh?

Williams: Nino.

Burks: Who?

Williams: Nino.

Burks: Oh Nino?

Williams: Yeah.

Burks: Yeah, what's up with him?

Williams: He got knocked off.

Burks: Yeah?

Williams: That was like my main man.

Burks: Yeah, yeah, so he got bumped?

Williams: Him and Weefy's boy. He was my main man.

Burks: Oh the one we saw that day?

Williams: Not . . . brother . . .

Burks: Nah, nah, nah, I know who you talking about. The other kid that we saw that day.

Williams: Yeah, yeah, yeah, yeah, yeah. House raid.

Burks: Yeah, for him?

Williams: Thirty breezies.

Burks: Huh? He had thirty?

Williams: Thirty.

Burks: Wow. Yeah. He kept telling [U/I]<sup>3</sup> he was making moves.

Williams: Huh?

Burks: Yeah, but he kept having people come around there though. That's what he talking about right? He kept meeting people down the street or up the street.

Williams: Yeah, he too loud man.

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<sup>3</sup> "[U/I]" means that, at this juncture, the portion of the conversation so designated cannot be heard on readily available equipment.

Based on the content of this conversation, other intercepted communications, and reports from Jersey City Police Department, Williams informed Burks that Bell ("Nino"), an associate of Williams ("my main man"), had been arrested by law enforcement. Further, Williams informed Burks that Small, an associate of Bowens ("Weefy's boy"), had been arrested with Bell. Williams explained that both men had been arrested in connection with 30 bricks of heroin ("30 breezies"). Finally, Burks and Williams discussed how Small would meet with other narcotics traffickers or customers near his residence ("down the street or up the street"), which is consistent with Small's activities shortly before his arrest on September 24, 2014.

20. On or about October 1, 2014, at approximately 8:56 p.m., Williams, using a cell phone with a telephone number ending in 0906 (hereinafter, the "Williams 0906 Phone"), spoke with an individual (hereinafter, "Coconspirator-2"). During that conversation, Williams asked Coconspirator-2, "You ready?" Coconspirator-2 replied, "I gotta grab money for two from my man" and then, "I got money for four but I gotta grab money for two." As the conversation continued, Williams instructed Coconspirator-2, "Go see Pete, ni\*\*\*, give that money to him" (referring to Lewis as "Pete"). Coconspirator-2 replied, "Aight, hear me out. I'm waiting for the money for the two." Williams said, "Aight, I got you." Based on the content of this conversation, and previously intercepted communications, Coconspirator-2 told Williams that he (Coconspirator-2) had the money for 2 bricks and would obtain the money for the other 2 bricks from his associate. Williams told Coconspirator-2 to meet with Lewis ("Pete") when Coconspirator-2 had the money for the 4 bricks of heroin.

21. Shortly thereafter, at approximately 9:16 p.m., Williams, using the Williams 9872 Phone, spoke with Lewis, who was using the Lewis 9772 Phone. During that conversation, Williams greeted Lewis, "Where you at, Pete?" After Lewis said he was leaving Jersey City, Lewis told Williams, "Yea, I saw [Coconspirator-2]. I gave him two, he gave me money for four, right?" Based on the content of this conversation, and previously intercepted communications, Lewis told Williams that he (Burks) had provided 2 bricks of heroin to Coconspirator-2.

22. On or about October 3, 2014, shortly before 6:00 p.m., Special Agents with the DEA approached an individual (hereinafter, "Individual-2") related to Williams to discuss Williams' drug-trafficking activities. After Williams learned that agents were then currently speaking with Individual-2, Williams, using the Williams 9872 Phone, instructed another individual to make sure "they ain't goin to my house," referring to a residence in Newark, New Jersey, used by Williams as a stash house for narcotics (hereinafter, the "Williams DTO Stash House").

23. At that point, law enforcement officers went to the Williams DTO Stash House. As agents were parking at the Williams DTO Stash House, they observed Williams departing in a 2009 Buick Lucerne, being followed by a green Chevrolet Trailblazer being driven by Burks. Williams was subsequently arrested, and he was found to be in possession of both the Williams 0906 Phone and the Williams 9872 Phone.

24. On or about October 4, 2014, agents conducted a lawful search of the Williams DTO Stash House, where they found, among other things, approximately 250 grams of powder heroin, materials used to cut narcotics, a blender, and a large sum of United States currency. The powder substance found inside the Williams DTO Stash House field-tested positive for the presence of heroin.

25. On or about October 6, 2014, agents conducted a lawful search of the 2009 Buick Lucerne in which Williams had been arrested. Inside a secret compartment located behind the passenger airbag, agents discovered a black, fully-loaded semi-automatic firearm and two kilograms of a substance that subsequently field-tested positive for heroin.