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

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	The Honorable Steven C. Mannion
TRAE K. ROBERTS,	:	
a/k/a "Trae Pound,"	:	
ERNEST VALENTINE,	:	Mag. No. 15-6095
a/k/a "BOP,"	:	
ANTONIO FOYE,	:	
a/k/a "Steel,"	:	<u>FILED UNDER SEAL</u>
MAX LARUE,	:	
a/k/a "Max,"	:	
WILLIE T. BROOKS,	:	
a/k/a "Animal,"	:	
RAKEEM HANKERSON,	:	
a/k/a "Rocco,"	:	
DARRELL JOHNSON,	:	
a/k/a "Scrilla,"	:	
JAROD RAVENELL,	:	
a/k/a "Roddy,"	:	
TAMIR WHITE,	:	
a/k/a "Trauma"	:	
TAUHEED SATCHELL,	:	
a/k/a "Tah," and	:	
MONESHA JOHNSON,	:	
a/k/a "Smoove,"	:	

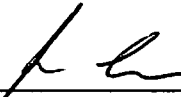
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

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 18, 2015 at Newark, New Jersey

THE HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Distribute Cocaine Base)

From in or about May 2013 through in or about May 4, 2015, in Essex County, in the District of New Jersey and elsewhere, defendants

TRAE K. ROBERTS,
a/k/a "Trae Pound,"
ERNEST VALENTINE,
a/k/a "BOP,"
ANTONIO FOYE,
a/k/a "Steel,"
MAX LARUE,
a/k/a "Max,"
WILLIE T. BROOKS,
a/k/a "Animal,"
RAKEEM HANKERSON,
a/k/a "Rocco,"
DARRELL JOHNSON,
a/k/a "Scrilla,"
JAROD RAVENELL,
a/k/a "Roddy,"
TAMIR WHITE,
a/k/a "Trauma,"
TAUHEED SATCHELL,
a/k/a "Tah," and
MONESHA JOHNSON,
a/k/a "Smoove,"

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II 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.

THE NEW JERSEY GRAPE STREET CRIPS

1. The Grape Street Crips are a nationwide street gang, founded in Los Angeles, California, and operating throughout the United States, including in the District of New Jersey (hereinafter, the “NJ Grape Street Crips” or the “Enterprise”).
2. Members and associates of the NJ Grape Street Crips are united in their common goals of preserving, protecting, promoting, and expanding the power and authority of the NJ Grape Street Crips, and of increasing respect for, and enriching, members and associates of the Enterprise.

MANNER & MEANS OF THE ENTERPRISE

3. The NJ Grape Street Crips routinely engage in acts of intimidation and violence—including murder, assault, and witness intimidation—to avenge attacks or perceived slights against other members of the Enterprise; to punish members who have been disloyal; to retaliate against rivals; to silence individuals who are perceived to be cooperating with law enforcement against the NJ Grape Street Crips; and to maintain and enhance the reputation of the NJ Grape Street Crips for the purpose of protecting and otherwise assisting their drug-trafficking business.

4. During the course of this investigation, Kwasi Mack, a/k/a “Welchs,” who is second-in-command of the NJ Grape Street Crips, and Corey Batts, a/k/a “C-Murder,” a/k/a “Cee,” another high-ranking member of the Enterprise, have been charged by a federal grand jury with conspiracy to commit murder, attempted murder, aggravated assault with a dangerous weapon, conspiracy to commit aggravated assault with a dangerous weapon, all in aid of racketeering, heroin distribution, conspiracy to distribute heroin, and using firearms in furtherance of crimes of violence and drug trafficking crimes. *See, e.g., United States v. Kwasi Mack & Corey Batts*, Second Superseding Indictment, Crim. No. 14-220 (SRC).

5. The rules governing the NJ Grape Street Crips provide that members of the Enterprise must retaliate against individuals who cooperate with law enforcement against the NJ Grape Street Crips. As a result of these rules, members of the NJ Grape Street Crips routinely engage in acts of intimidation and violence against witnesses, individuals who are believed to be cooperating with law enforcement, and law enforcement officers themselves.

6. Following the federal grand jury indictment referenced in paragraph 4, *supra*, Corey Batts, a/k/a “C-Murder,” a/k/a “Cee,” was charged by federal criminal complaint with attempting to murder a Special Agent of the Federal Bureau of Investigation (“FBI”) and soliciting the commission of a crime of violence against the Special Agent. *See, e.g., United States v. Corey Batts*, Criminal Complaint, Mag. No. 14-7239 (CLW).

7. As described in detail below, members of the NJ Grape Street Crips routinely use social media, cellular telephones, and other means: (i) to identify publicly individuals who are cooperating, or who previously have cooperated, with law enforcement; (ii) to issue threats against individuals who are cooperating with law enforcement; and (iii) to disseminate messages intended to dissuade individuals and witnesses from cooperating with law enforcement. For example:

a. In March 2015, law enforcement officers lawfully intercepted wire communications of defendant Ahmed Singleton, a/k/a “Gangsta-Moo,” a/k/a “Gangsta,” a/k/a “Mooshie” (hereinafter “Singleton”), a member of the NJ Grape Street Crips, who had been charged by the Essex County Prosecutor’s Office with, among other charges, aggravated assault with a deadly weapon in connection with a shooting. On or about March 17, 2015, Singleton, using a cell phone with a telephone number ending in 4228 (hereinafter, the “Singleton 4228 Phone”), spoke with Louis Coston, a/k/a “Real Rell” (hereinafter, “Coston”), another member of the Enterprise who was using a cell phone number ending in 5340 (hereinafter, the “Coston 5340 Phone”).¹ Singleton and Coston had the following exchange:

Singleton: Yo.

Coston: What’s good kid?

Singleton: Who this, Real Rell?

Coston: Yeah.

...

Singleton: Yeah, yo, I beat trial too, yo, by the way.

¹ Singleton and Louis Coston, a/k/a “Real Rell,” were charged by federal criminal complaint, filed on or about May 4, 2015, under Magistrate Number 15-6593, with conspiracy to distribute, and possess with intent to distribute, one kilogram or more of heroin, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

Coston: I'm glad, that's my boy, as you should.

Singleton: That ni**a took the stand and everything. You heard?

Coston: Yeah, yeah, I wanna talk to you in person about that shit son.

Singleton: Yeah, brah, that shit is a cold case. I don't give a fuck--

Coston: Aight, so what happened?

Singleton: I don't give a fuck about that case, they can't open-- case been dismissed, shit been acquitted. They cannot bring charges up on me.

Coston: Aight. What happened? You said he took the stand?

Singleton: Huh?

Coston: You said he took the stand?

Singleton: You said what?

Coston: I said, "You said he took the stand?"

Singleton: Nah, he got up there though, but when he got up there though, he just like, "Yo, I ain't got nothing to say," like tough as hell, like, "Yo I ain't got nothing to say." [Laughing] Yo, word up, when he came out, when they brung him out, I was shooting that ni**a fifty to life. [Yelling:] I wanted to grab that ni**a on the stand and choke his ass, like--

Coston: [Laughing]

Singleton: I was looking at this ni**a like, oh, I'm like-- Yo, but my lawyer told me that they was bringing a ni**a out, he like, yo the ni**a lawyer told me, the ni**a lawyer was present, he like, "Yo my client downstairs," like, yo, like, look, like, "he told me to tell him [Singleton], he gonna do the right thing," like, so, like, yo, "just keep that in mind, like he doing the right thing," like. Like, basically, don't take that ni**a shit off when he come home for telling on him [Singleton] cause he about to get me [Singleton] out of that jam. [Laughing]

Coston: [Laughing]

Singleton: So I'm like, kinda, once they said they bringing him on that stand, you heard? But the ni**a like, um, he come out, yo I started shooting on this ni**a, like when I say a hundred, like, yo, on everything. Ni**a didn't wanna make eye contact with me or nothin. You know, *I had the goons in the back seat so, so he recognized all the goons all the goons lined up in the back*, like, "Oh he got them goons in here, like," word up, that ni**a was fifty though son, that ni**a ain't wanna look at nobody eyes, you heard son?

Coston: That ni**a a [U/I].²

Singleton: That's why I wanna do it like that, like I had all-- like everybody like in the back, so they could see, like these ni**as [U/I]. Like, yo, the ni**a, word in bond son, ni**a came out, they like swore the ni**a in and shit, like, he like, "Yo, uhh," he like, "Yo, I don't, I, I don't want, I ain't got nothing to say." And then yo, my lawyer, like, "Whoa, whoa, what you mean? You said, you said, you had a lot to say at the headquarters. You don't got nothing to say now?" He like, "Yo I don't got nothing to say, like."

Coston: [Laughing]

Singleton: Now, now, now, he can't [U/I] my lawyer, so I'm like, I'm about to have to break this ni**a, this ni**a got my freedom in his hands, you heard?

Coston: Yeah.

Singleton: So you know I'm looking at this ni**a mean as hell, like, word is bond--

Singleton then goes on to tell Coston that the charges against him (Singleton) were dismissed as a result. Singleton continued:

Singleton: I walked out of court free, ni**a, who you know do that?

Coston: LMLD,³ no lacking, LMLD, there's no lacking. Huh?

² "[U/I]" means that, at this juncture, the portion of the conversation so designated cannot be heard on readily-available equipment."

³ "LMLD" stands for "long money, long dreads." Both Carnegie and Singleton use "LMLD" as a quasi-brand reference to themselves.

Singleton: You know what, who, *who you know cause ruckus on these motherfuckin streets, come home, do whatever the fuck they want, and still be out here son?*

(emphases supplied). Based on the content of this conversation and other intercepted communications, Singleton was bragging to Coston about how he (Singleton) had “beat” the charges brought against him by the Essex County Prosecutor’s Office. Initially, Coston told Singleton that he and Singleton should discuss it in person, rather than over the phone. But Singleton then told Coston that he was not concerned about talking about the case over the phone because it was a “cold case,” it had “been dismissed,” and he had been “acquitted.” Singleton then told Coston that he (Singleton) had arranged to have fellow gang-members (“the goons”) in the gallery at the back of the courtroom in order to intimidate the victim-witness. Singleton also recounted that the victim-witness’s lawyer had told Singleton and his lawyer that the victim-witness was “going to do the right thing” (i.e., refuse to testify against Singleton). Singleton explained that the victim-witness’s lawyer relayed this message to Singleton’s lawyer so that Singleton did not physically harm the victim-witness when he (the victim-witness) got out of prison (“basically, don’t take that ni**a shit off when he come home for telling on him”). Singleton then bragged to Coston that he (Singleton) had committed the shooting (“who you cause ruckus on these motherfucking streets”), gotten out on bail (“come home”), and then beaten the charges against him (“and still be out here son”).

b. On or about August 28, 2014—*after* the shooting for which Singleton was charged by the Essex County Prosecutor’s Office, but before the charges were dismissed—a video posted on YouTube shows Singleton stating, “No rats though, no rats, we don’t do rats, we don’t eat cheese. Keep that shit over there, we don’t tolerate that shit.” At that point, defendant Justin Carnegie, a/k/a “Dew Hi,” a/k/a “Dew,” a/k/a “D” (hereinafter, “Carnegie”),⁴ also a member of the NJ Grape Street Crips, states, “187 on all rats. . . . If ya’ll don’t hear anything else, ya’ll gonna hear about how we be straight rat killin on that shit. It ain’t no love over here. If a ni**a associating with them, they could die too.” Based on my knowledge and experience, the term “187” is a gang reference to the California Penal Code Section 187, which defines the crime of murder. Thus, the phrase “187 on all rats” means that individuals who cooperate with law enforcement should be murdered.

c. In late 2013, a senior member of the NJ Grape Street Crips used a social media account to identify an individual as having previously cooperated with a murder investigation conducted by the Essex County Prosecutor’s Office. Several days after that social media post, several members of the NJ Grape Street Crips repeatedly shot and nearly killed two people, one of whom was the individual who had been identified as having cooperated.

⁴ Carnegie was charged by federal criminal complaint, filed on or about May 4, 2015, under Magistrate Number 15-6593, with conspiracy to distribute, and possess with intent to distribute, one kilogram or more of heroin, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

d. In late 2013, following the arrest of numerous gang members, law enforcement officials learned that members of the NJ Grape Street Crips on the street had directed those members of the Enterprise who were incarcerated at a county correctional facility to physically assault an individual who was believed to have cooperated with the law enforcement investigation.

e. A post on a social media account used by defendant Carnegie shows an extremely graphic photograph of a bloody individual with his jaw and neck blown away from his face. The caption to the post states: “@AllSnitches I bet ur ass won’t talk again #187AllRats.”

f. A video posted on a social media account shows a member of the Grape Street Crips, while holding a stack of papers in his hand, stating: “I’ve seen a lot of ni**as paperwork man . . . shit thicka then a book, I ain’t never seen nobody’s motherfuckin paperwork this motherfuckin thick. Ni**a told on everybody man . . . you fuckin rat.” Based on my knowledge and experience, the word “paperwork” in this context refers to the pretrial discovery received by criminal defendants. Members of the NJ Grape Street Crips frequently obtain and circulate to other gang members any discovery documents suggesting that an individual or fellow gang member is cooperating with law enforcement or has provided law enforcement with information about other gang members or the Enterprise generally.

g. A social media account used by a senior member of the NJ Grape Street Crips who is facing a federal indictment in this District shows a post stating: “ME AND MY NI**AZ WILL BURN OUR TONGUE B4 WE RAT #TEAMKAR.” Based on my knowledge and experience, the phrase “TEAMKAR” means “Team Kill All Rats.”

h. Finally, as described in paragraph 48 through 50 of the federal criminal complaint filed in *United States v. Vanderhall et al.*, Mag. No. 15-6592, members and leaders of the NJ Grape Street Crips also physically assault members of the Enterprise who violate the Enterprise’s rules or protocols.

8. Members of the Enterprise, including the defendants charged herein, utilized their affiliation with the NJ Grape Street Crips to protect and otherwise assist their drug-trafficking business. Further, members of the Enterprise, including the defendants charged herein, engaged in violent acts to maintain and enhance the reputation of NJ Grape Street Crips for the purpose of protecting and otherwise assisting their drug trafficking business. As described in paragraph 50 of the federal criminal complaint filed in *United States v. Vanderhall et al.*, Mag. No. 15-6592, members of the NJ Grape Street Crips also resort to violence when their drug profits are threatened.

9. Members and associates of the NJ Grape Street Crips engaged in, and/or controlled, drug trafficking and other criminal activities in various public-housing complexes and neighborhoods in Newark, New Jersey, including (i) the area of 6th Avenue and North 5th Street (hereinafter, the “6th Avenue Location”); (ii) the Pennington Court public-housing complex located on Pennington Street (hereinafter, the “Pennington Court Location”); (iii) the Millard Terrell Homes public-housing complex located on Riverview Terrace (hereinafter, the “Riverview Court Location”); (iv) the Oscar Miles public-housing complex located on Court

Street (hereinafter, the “Oscar Miles Location”); (v) the New Hope Village housing complex located on Norfolk Street (hereinafter, the “New Hope Village Location”); (vi) the Wynona Lipman Gardens and Kemsco public-housing complexes located near 7th Avenue (hereinafter, the “7th Avenue Locations”); and the John W. Hyatt public-housing complex located on Hawkins Street (hereinafter, the “Hyatt Court Location”).

10. From at least May 2013 through April 2015, the members and associates of the NJ Grape Street Crips operated a large drug-trafficking organization that distributed cocaine base (“crack-cocaine”) and heroin at the wholesale- and retail-level in and around Newark, New Jersey. Based on court-authorized wiretaps, physical surveillance, and other investigative techniques, law enforcement uncovered the operational structure and inner workings of this drug-trafficking organization and the method and means by which it carried out the narcotics-trafficking conspiracy. Among other things, the defendants charged herein:

- a. Purchased bulk quantities of powder cocaine and heroin from various sources of supply;
- b. Cooked powder cocaine into crack-cocaine, which they then sold to retail distributors of crack-cocaine;
- c. Used various “stash houses” and other temporary locations to package, store, and distribute crack-cocaine and heroin;
- d. Shared and utilized a dedicated cell phone to accept orders for distribution quantities of crack-cocaine to more junior gang members and other crack-cocaine dealers; and
- e. Took steps to avoid detection by law enforcement, including using prepaid cellular telephones with fictitious or no subscriber information for short periods of time and then “dropping” or replacing those devices with other prepaid phones, speaking in code to disguise the illicit nature of their discussions, and warning each other about the presence of suspected law enforcement cameras and officers in the areas in which the Enterprise operated.

THE DEFENDANTS & THEIR ROLES

11. At all times relevant to this Criminal Complaint:

- a. Coconspirators Eric Concepcion, a/k/a “Eddie Arroyo,” a/k/a “E-Wax” a/k/a “Wax” (hereinafter, “Concepcion”), Jamar Hamilton, a/k/a “Gunner” (hereinafter, “Hamilton”), Tyquan Clark, a/k/a “Tah” (hereinafter, “Clark”), Christopher Coelho, a/k/a “Brazil” (hereinafter, “Coelho”), were members of the Grape Street Crips who were actively involved in the Enterprise’s distribution of crack-cocaine and heroin at or around the 6th Avenue Location. Specifically, Concepcion, Hamilton, Clark, and Coelho—all of whom were charged in a separate federal criminal complaint⁵—utilized and shared a dedicated cell phone (hereinafter,

⁵ Coconspirators Concepcion, Hamilton, Clark, and Coelho were charged by federal criminal complaint filed on or about May 6, 2015, under Magistrate Number 15-6592. Concepcion, Hamilton, and Clark were charged with running a continuing criminal enterprise, in

“Cell Phone-1”) to accept orders for distribution quantities of crack-cocaine from junior gang-members and other distributors of crack-cocaine. Concepcion, Hamilton, Clark, and Coelho each took turns using Cell Phone-1 to distribute set quantities of crack-cocaine. In addition, Concepcion, Hamilton, Clark, and Coelho each used their personal cell phones to coordinate their drug-trafficking activities.

b. Coconspirator Hamilton, in addition to using Cell Phone-1 to distribute crack-cocaine, used his personal cell phone to sell distribution quantities of heroin.

c. Coconspirator Hakeem Vanderhall, a/k/a “Keem,” a/k/a “Sugar Bear” (hereinafter, “Vanderhall”), was a senior member of the NJ Grape Street Crips who engaged in, and supervised, the street-level distribution of crack-cocaine and heroin by junior members of the Enterprise at or around the 6th Avenue Location. Vanderhall—who was charged in a separate federal criminal complaint⁶—himself also sold crack-cocaine and heroin. Vanderhall and Clark, among others, assisted in the cooking and packaging of powder cocaine into crack-cocaine for distribution.

d. Defendants Trae K. Roberts, a/k/a “Trae Pound” (hereinafter, “Roberts”), Ernest Valentine, a/k/a “BOP” (hereinafter, “Valentine”), Antonio Foye, a/k/a “Steel” (hereinafter, “Foye”), Willie T. Brooks, a/k/a “Animal” (hereinafter, “Brooks”), Rakeem Hankerson, a/k/a “Rocco” (hereinafter, “Hankerson”), Darrell Johnson, a/k/a “Scrilla” (hereinafter, “Johnson”), Max Larue, a/k/a “Max” (hereinafter, “Larue”), Tamir White, a/k/a “Trauma” (hereinafter, “White”), and Monesha Johnson, a/k/a “Smoove” (hereinafter, “M. Johnson”), were members of the NJ Grape Street Crips and sold distribution quantities of crack-cocaine (and/or heroin) to retail level customers at or around the 6th Avenue Location.

e. Defendant Jarod Ravenell, a/k/a “Roddy” (hereinafter, “Ravenell”) purchased from coconspirators Concepcion, Hamilton, Clark, and Coelho distribution quantities of crack-cocaine. Ravenell operated at the New Hope Village Location.

f. Defendant Tauheed Satchell, a/k/a “Tah” (hereinafter, “Satchell”), purchased distribution quantities of crack-cocaine from Concepcion, Hamilton, Clark, and

violation of Title 21, United States Code, Sections 848(a) and 848(c), and conspiracy to distribute 280 grams or more of crack-cocaine, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846. Concepcion and Hamilton were also charged with conspiracy to distribute heroin, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(B), in violation of Title 21, United States Code, Section 846.

⁶ Coconspirator Vanderhall was charged by federal criminal complaint filed on or about May 6, 2015, under Magistrate Number 15-6592, with running a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 848(a) and 848(c), and conspiracy to distribute 280 grams or more of crack-cocaine, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846.

Coelho, which he resold to retail-level customers in the area of 4th Avenue and North 12th Street in Newark, New Jersey.

g. Coconspirators Carnegie and Singleton are long-time members of the NJ Grape Street Crips who were actively involved in the Enterprise's distribution of heroin. Carnegie and Singleton used their own dedicated cell phone (hereinafter, "Carnegie-Singleton Phone") to conduct a high-volume heroin distribution business. Coconspirator Coston is a member of the Grape Street Crips who served as a drug-runner for Singleton. Carnegie obtained supplies of heroin from coconspirator Hamilton. Both Carnegie and Singleton have repeatedly possessed firearms in the past and used firearms to protect and otherwise assist their drug-trafficking business and gang-related activities. For example: On or about December 21, 2009, Singleton possessed a 9mm caliber Ruger P89 semi-automatic firearm that was used on that date to shoot two individuals. On or about January 6, 2010, Singleton nearly jumped out of a window as police officers entered his residence and was later found in possession of a loaded .38 caliber Smith & Wesson revolver. On or about May 10, 2010, after police attempted to stop a vehicle in which Carnegie was a passenger, Carnegie discarded three bricks of heroin from the vehicle window. After the vehicle stopped, Carnegie got out of the vehicle and ran away. After Carnegie was apprehended, law enforcement officers executed a search warrant on a residence at which Carnegie stored, among other things, a loaded Romarm SA Cugir 7.62x39 assault rifle, an American Industries Calico M100 .22LR carbine, 7.62x39 caliber ammunition, .22 caliber ammunition, \$2,952 in U.S. currency, a quantity of cocaine, a quantity of heroin, and a digital scale.

h. Coconspirator Leonardo Arroyo, a/k/a "Leo" (hereinafter, "Arroyo"), charged in a separate federal criminal complaint, was a supplier of cocaine to coconspirators Concepcion, Hamilton, Clark, and Coelho at the 6th Avenue Location. In addition, Arroyo and his associate Wilfred Mendez, a/k/a "Will," charged in a separate federal criminal complaint, sold distribution quantities of crack-cocaine and heroin at or around the 6th Avenue Location.

i. Coconspirator Oneil Concepcion, a/k/a "Bori" (hereinafter, "Oneil Concepcion"), charged in a separate federal criminal complaint, was a supplier of cocaine to Arroyo and, through Arroyo, to the NJ Grape Street Crips operating at or around the 6th Avenue Location.⁷

j. Coconspirator Toma Williams, a/k/a "T-Dubbs" (hereinafter, "Williams"), charged in a separate federal criminal complaint, was a supplier of heroin to coconspirators Hamilton, Concepcion, and others at the 6th Avenue Location.⁸ In addition, Williams ran a

⁷ Coconspirators Arroyo, Mendez, and Oneil Concepcion were charged by federal criminal complaint, filed on or about May 18, 2015, under Magistrate Number 15-6097, with conspiracy to distribute 500 grams or more of cocaine, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(B), and coconspirator Arroyo is charged with conspiracy to distribute 280 grams or more of crack-cocaine, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(A), both in violation of Title 21, United States Code, Sections 846.

⁸ 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

drug-trafficking organization (the “Williams DTO”) that supplied heroin in and around Newark, New Jersey, and Jersey City, New Jersey. Five members of the Williams DTO were charged in a federal criminal complaint filed on May 13, 2015. *United States v. Bowens et al.*, Mag. No. 15-3576 (MF).

k. Coconspirator James S. Gutierrez, a/k/a “Bad News,” a/k/a “Stevie G” (hereinafter, “Gutierrez”), was a ranking member of the NJ Grape Street Crips who purchased distribution quantities of crack-cocaine from coconspirators Concepcion, Hamilton, Clark, and Coelho. Gutierrez then resold that crack-cocaine to retail-level customers at the Riverview Terrace Location. In addition, Gutierrez purchased from Hamilton, among other individuals, distribution quantities of heroin, which Gutierrez also resold at the Riverview Terrace Location.

l. Coconspirator Vincent Livingston, a/k/a “Double O” (hereinafter, “Livingston”), was a taxi-cab driver in Newark, New Jersey, who purchased distribution quantities of crack-cocaine, which he then resold to retail-level customers in and around Newark, New Jersey.⁹

THE INVESTIGATION

12. Between in or around September 2013 and in or around April 2015, the United States District Court, District of New Jersey, entered orders authorizing electronic surveillance over numerous cell phones. As a result of that electronic surveillance, law enforcement has learned the scope of the Enterprise’s drug trafficking at various locations. Some of these communications and other evidence are described below.

Overview of the Crack-Cocaine Conspiracy Among Concepcion, Hamilton, Clark, & Coelho

13. Coconspirators Concepcion, Hamilton, Clark, and Coelho sold distribution quantities of crack-cocaine using Cell Phone-1. Cell Phone-1 was a well-known and dedicated phone number through which gang members and other drug dealers could purchase distribution quantities of crack-cocaine. In fact, between on or about May 10, 2013, through in or about January 2014, Cell Phone-1 made and received over 111,000 phone calls or an average of over 180 calls per day—the overwhelming majority of which were for the purpose of distributing crack-cocaine.

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

⁹ Livingston, along with seven other coconspirators, were charged by federal criminal complaint, filed on or about May 18, 2015, under Magistrate Number 15-6096, with conspiracy to distribute 280 grams or more of crack-cocaine, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(A), both in violation of Title 21, United States Code, Sections 846.

14. During the course of the investigation, Concepcion, Hamilton, Clark, and Coelho used Cell Phone-1 to distribute thousands of “clips” of crack-cocaine.¹⁰ In addition to using Cell Phone-1, Concepcion, Hamilton, Clark, and Coelho each used their personal cell phones to coordinate their drug-trafficking activities—for example, to discuss who had possession of Cell Phone-1 at any particular time, how many clips of crack-cocaine they each had left to sell, the quality of the crack-cocaine, and law enforcement presence in the area.

15. Concepcion was the supervisor of the defendants who used Cell Phone-1 to distribute crack-cocaine. For example, on or about June 8, 2014, at approximately 2:21 p.m., Johnson, using a phone with a telephone number ending in 7204 (hereinafter, the “Johnson 7204 Phone”), spoke with Concepcion, who was using Cell Phone-1. When the call began, Johnson asked, “Who this, Wax?” (referring to Concepcion by his gang name). Concepcion replied, “Who this,” and Johnson answered, “Scrilla” (referring to himself by his gang name). After informing Concepcion that someone had stolen money from him (Johnson), Johnson asked Concepcion, “Why don’t you just put me on your team, brah” (asking Concepcion to allow Johnson to be in the group of gang-members who used Cell Phone-1 to distribute crack-cocaine). When Concepcion declined, he and Johnson had the following exchange:

Johnson: Aight, brah, you keep saying-- believe that shit how long son? N**** [U/I] put me on the team no problems son. Don’t you think they was going through something when they did that. They still did it cause they ain’t want to be on the block son. I got four open brick¹¹ charges, brah. Hello?

Concepcion: I’m listening to you, Scrilla.

Johnson: For real son. When is it going to be my time nigga? I wasn’t, I wasn’t introduced to 5th to nobody but you brah. I supposed to be with you, Tah, and Gunner son. N****, all ya’ll got ya’ll own shit, own cars, own apartments. Don’t you think I want to have my own son?

Based on the content of this conversation and other intercepted communications, Johnson pleaded with Concepcion to allow him (Johnson) to join the group of individuals (Concepcion,

¹⁰ Based on my training and experience and on the facts discovered during the course of this investigation, members, associates, and customers of the NJ Grape Street Crips distributing narcotics at or around the 6th Avenue Location used the terms “clip,” “ball,” and “piece,” interchangeably. These terms refer to a drug-distribution package containing around 10 individual “hits,” or doses, of crack-cocaine.

¹¹ 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, are composed of 10 envelopes or “decks” of heroin.

Hamilton, Clark, and Coelho) who used Cell Phone-1 to distribute crack-cocaine. Johnson told Concepcion that he (Johnson) could not sell crack-cocaine by engaging in hand-to-hand transactions on the street because he had four open charges for selling bricks of heroin.¹² Johnson told Concepcion that he (Johnson) was supposed to be on the team with Concepcion, Clark (Tah), and Hamilton (Gunner).

16. On or about July 10, 2014, at approximately 10:56 a.m., Concepcion, using a phone with a telephone number ending in 9434 (hereinafter, the "Concepcion 9434 Phone"), received a call from Hamilton who was using a phone with a telephone number ending in 7498 (hereinafter, the "Hamilton 7498 Phone"). During the call, Hamilton and Concepcion had the following exchange:

Hamilton: What's good? What you doing?

Concepcion: Waiting for this dumb ass phone to ring.

Hamilton: Ah, when you think I'm going to have the mic?

Concepcion: Brazil said he didn't, f***ing, I told him ah, yesterday, to grab the phone cause it was slow. I ain't even missing the money but I told him grab it. Grab the phone so he can jump on. N**** try to, ah, ah, make some money and shit, ah, I don't know, I probably, out of my two-hundo, I probable got like forty left and he still got to do his.

Based on the content of this conversation and other intercepted communications, Concepcion reported to Hamilton that he (Concepcion) was waiting for customers to call Cell Phone-1 to place orders for crack-cocaine. Hamilton then asked Concepcion when it would be Hamilton's turn to use the phone ("the mic"). Concepcion told Hamilton that, out of 200 clips of crack-cocaine that Concepcion had started with, Concepcion still had 40 clips left to sell. Concepcion then indicated that it would be Coelho's (Brazil's) turn.

17. On or about July 15, 2014, at approximately 1:32 p.m., Hamilton using the Hamilton 7498 Phone spoke with Clark, who was using a cell phone with a telephone number ending in 4757 (hereinafter, the "Clark 4757 Phone"). During that conversation, Hamilton and Clark had the following discussion:

Hamilton: Be easy, bro, it's hot as hell out son.

Clark: I just was out there.

Hamilton: You saw them?

¹² In fact, Johnson was arrested on or about January 6, 2014, in possession of 31 decks of heroin and 5 vials of crack-cocaine, on or about May 8, 2014, in possession of 1 brick of heroin and \$485, and on or about May 28, 2014, in possession of 1 brick of heroin.

Clark: I only seen the blue Crown.

Hamilton: Man, white Impala, blue Crown, white truck. That white truck like twice, son. Had like ten joints on me. I'm bout to serve a n**** over there by your house. I said, "Oh, shit!"

Based on the content of this conversation and other intercepted communications, Hamilton warned Clark that there was a heavy law enforcement presence in the area ("hot as hell out"). Specifically, Hamilton told Clark that he (Hamilton) had 10 clips of crack-cocaine on him and that he (Hamilton) was about to serve a customer with crack-cocaine when he saw numerous unmarked law enforcement vehicles, including a white Chevy Impala, a blue Ford Crown Victoria, and a white truck.

18. On or about July 20, 2014, at approximately 10:07 a.m., Concepcion, using the Concepcion 9434 Phone, received a call from Hamilton at the Hamilton 7498 Phone. During the call, Hamilton and Concepcion had the following exchange:

Hamilton: I gave Tah the phone. I'm about to get up in a little while.

Concepcion: What he took, like sixty?

Hamilton: Ah, yeah, something like that.

Concepcion: Yeah, he sold fifty yesterday. Tah said he sold fifty.

Based on the content of this conversation and other intercepted communications, Hamilton told Concepcion that he (Hamilton) had given Clark Cell Phone-1 and that Clark had 60 clips of crack-cocaine to sell. Concepcion told Hamilton that Clark had told Concepcion that he (Clark) had sold 50 clips the previous day.

19. On or about July 20, 2014, at approximately 3:47 p.m., Hamilton, using the Hamilton 7498 Phone, called Clark, who was using the Clark 4757 Phone. Clark and Hamilton had the following exchange:

Clark: Yo.

Hamilton: Ay yo, I had just gave it to Brazil right, but he got like eleven, plus I ain't never go finish my watcha call those? Want me to have him call you after he done?

Clark: Yeah, yeah, just come-- ay yo, um-- [U/I] gave me the money for you, so just give me, just take that out of that.

Hamilton: Aight, true.

Based on the content of this conversation and other intercepted communications, Hamilton told Clark that he (Hamilton) had just given Cell Phone-1 to Coelho and that Coelho had 11 clips of crack-cocaine remaining to sell. Hamilton and Clark agreed that Coelho would hand-off Cell Phone-1 to Clark after Coelho had finished selling the 11 clips.

20. In fact, other intercepted communications confirm that, shortly before the conversation discussed in the preceding paragraph, Hamilton was using Cell Phone-1 to sell crack-cocaine. For example, at approximately 3:14 p.m., Hamilton, using Cell Phone-1, received a call from an individual (hereinafter, "Coconspirator-1"). During that conversation, Hamilton asked Coconspirator-1, "What you tryin to do?" (asking Coconspirator-1 how many clips of crack-cocaine he wanted to purchase). Coconspirator-1 replied, "Ten piece" (meaning that Coconspirator-1 wished to purchase 10 clips of crack-cocaine from Hamilton).

21. On or about July 20, 2014, at approximately 4:01 p.m., Concepcion, using the Concepcion 9434 Phone, placed a call to Hamilton at the Hamilton 9434 Phone. During that call, Hamilton and Concepcion had the following exchange:

Concepcion: Did you give Tah that?

Hamilton: Nah, Tah ain't come out. He said he's gonna see me when he come out, I told him, I had, he said, "Aight." [Pause] Cause I did, I ain't, I ain't go do the other ones. I gave it to Brazil, cause he has twenty. But he, he got like ten left. I told Tah he might as well come on, cause I'm about to go do mine.

Concepcion: You gave the phone to Brazil?

Hamilton: I gave it to Brazil, yeah! Cause he said he got like twenty, but somebody had called for ten so, I, he probably done, so I called Tah, Tah said he called him. Called him when they good though. He said call him when Brazil done and umm, give [U/I] out, cause I gotta go do, I'm about to go do mine now.

Based on the content of this conversation and other intercepted communications, Concepcion asked Hamilton whether he (Hamilton) had given Cell Phone-1 to Clark. Hamilton explained that he had given Cell Phone-1 to Coelho because Coelho had 20 clips of crack-cocaine to sell. Hamilton further explained that a customer had called Coelho at Cell Phone-1 asking to purchase 10 clips, so Coelho had almost finished his supply of crack-cocaine.

22. In fact, intercepted wire communications confirm that Coelho, at around this time, was using Cell Phone-1 to sell crack-cocaine. For example, at approximately 4:59 p.m., Coelho, using Cell Phone-1, received a call from Livingston, who was using a phone with a telephone number ending in 7717 (hereinafter, the "Livingston 7717 Phone"). During that call, Livingston

told Coelho, "I'm by the school," (referring to the Dr. E. Alma Flagg Public School, a K-8 public school located near the 6th Avenue Location). Coelho asked, "Yeah, what's the count" (asking Livingston how many clips of crack-cocaine he wanted to purchase). Livingston said that he wanted "4." Based on the content of this conversation and previously intercepted communications, Coelho and Livingston were discussing a drug transaction involving 4 clips of crack-cocaine.

23. On or about July 21, 2014, at approximately 9:49 a.m., Hamilton using the Hamilton 7498 Phone, placed a call to Clark at the Clark 4757 Number. During that call, Hamilton said, "I'ma be out in a little bit. How you looking?" Clark replied, "Ah, I guess-- I got this shit. I got like twenty" (meaning that Clark had 20 clips of crack-cocaine left to sell). Hamilton responded, "Aight, I'ma hit you when I come down there."

24. On or about July 21, 2014, at approximately 1:26 p.m., Concepcion, using the Concepcion 9434 Phone, placed a call to Hamilton at the Hamilton 7498 Phone. During that call, Concepcion and Hamilton had the following exchange:

Concepcion: You ain't never grab the phone?

Hamilton: No, I ain't never grab it. I'm about to grab it right now from Tah. I only got like twenty, twenty balls. You still working?

Concepcion: No, I never got-- I never finished, man. Because my finger started hurting. I'ma, I'm at, just left Short Hills about to go to the doctor with [an individual] and um--

Hamilton: I got twenty-nine balls, if you hear that.

Concepcion: Brazil finished his, right?

Hamilton: Yeah, Brazil finished his.

Concepcion: Yeah, I got, I need somebody to help me pull some work from over there. When I leave from up here I'm gonna go straight over there and stay over there for the rest of the day. So get with Tah and ya'll finish ya'll shit up.

Hamilton: Aight.

Based on the content of this conversation and other intercepted communications, Concepcion asked Hamilton whether Hamilton had taken possession of Cell Phone-1. Hamilton told Concepcion that he (Hamilton) had not taken possession of Cell Phone-1 but that he was about to take it from Clark. Concepcion told Hamilton that he had not finished packaging additional clips of crack-cocaine. Hamilton further explained that he (Hamilton) only had 29 clips of crack-cocaine left to sell. Concepcion then asked Hamilton whether Coelho had finished his supply,

and Hamilton confirmed that Coelho had finished selling his supply of crack-cocaine. Concepcion then instructed Hamilton that he (Hamilton) and Clark should use Cell Phone-1 to finish selling their supply of crack-cocaine, while Concepcion packaged additional clips of crack-cocaine for sale.

25. In fact, intercepted communications over Cell Phone-1 confirm that shortly before the call discussed in the preceding paragraph, Clark had in fact been using Cell Phone-1 to sell crack-cocaine. For example, at approximately 12:10 p.m., Clark, using Cell Phone-1, received a call from an individual (hereinafter, "Coconspirator-2"). During that conversation, Coconspirator-2 asked Clark, "Do you wanna bring me two by, um, by Popeye's? I'ma call, I'ma call you right back like, like in an hour" (asking to purchase 2 clips of crack-cocaine from Clark). Clark replied, "Aight, give me a few minutes."

26. Later that day, on or about July 21, 2014, at approximately 4:01 p.m., Concepcion, using the Concepcion 9434 Phone, placed a call to Clark at the Clark 4757 Phone. During that call, Concepcion asked Clark, "If you get some time, if you get some time, come over, help me bust these bags yo" (asking Clark for help packaging crack-cocaine for distribution). Clark indicated that he would call Concepcion when he (Clark) was "ready for it."

27. Shortly thereafter, at approximately 4:20 p.m., Clark, using the Clark 4757 Phone, placed a call to Concepcion, who was using the Concepcion 9434 Phone. During that call, Concepcion asked Clark to bring him some "sandwich bags" (which are used to package clips of crack-cocaine for distribution). Clark replied that he would try to make his way to Concepcion but stated, "I'm dirty" (meaning that Clark had narcotics on him and therefore needed to be careful so as not to be stopped by law enforcement).

28. On or about July 21, 2014, at approximately 8:25 p.m., Hamilton, using the Hamilton 7498 Phone, placed a call to Concepcion at the Concepcion 9434 Phone. During the call, Hamilton asked Concepcion, "What you got left brodie?" Concepcion replied, "I got about a hundred" (meaning that Concepcion had 100 clips of crack-cocaine left to sell).

29. On or about July 22, 2014, at approximately 10:48 a.m., Hamilton, using the Hamilton 7498 Phone, placed a call to Concepcion at the Concepcion 9434 Phone. During the call, Hamilton asked Concepcion, "I got time to rock the mic or no?" Concepcion stated, "Go ahead. Tah ain't rocking?" Hamilton replied, "Nah, Tah told me to come get it." Based on the content of this conversation and other intercepted communications, Hamilton asked Concepcion if he (Hamilton) could take Cell Phone-1 ("the mic") to sell crack-cocaine ("to rock"). Concepcion asked Hamilton whether Clark was using it to sell crack-cocaine, and Hamilton replied that Clark had told Hamilton that he (Hamilton) could use Cell Phone-1.

30. On or about July 22, 2014, at approximately 12:28 p.m., Clark, using the Clark 4757 Phone, placed a call to Concepcion at the Concepcion 9434 Phone. Concepcion and Clark had the following conversation:

Clark: You see Gunner?

Concepcion: He's on his way to get the phone.

Clark: How long ago he said that?

Concepcion: Just now.

Clark: I'm just saying cause I had some mix, some shit last night like bad and good and shit. And the good shit gone already, I didn't get chance to mix it.

Based on the content of this conversation and other intercepted communications, Concepcion told Clark that Hamilton was about to pick up Cell Phone-1. Clark then explained to Concepcion that he (Clark) had "good" and "bad" quantities of crack-cocaine and that he had not yet had an opportunity to mix it (that is, to mix some of the "bad" crack-cocaine with some of the "good," in order to even out its quality).

31. On or about July 22, 2014, at approximately 3:06 p.m., Hamilton, using the Hamilton 7498 Phone, placed a call to Concepcion at the Concepcion 9434 Phone. Hamilton and Concepcion had the following exchange:

Hamilton: What you got left?

Concepcion: I'm balling a hundred up.

Hamilton: You said, you balling up a hundred?

Concepcion: Yeah.

Hamilton: You need to do that, man. I got like six.

Concepcion: Aight.

Based on the content of this conversation and other intercepted communications, Concepcion told Hamilton that he was putting together 100 clips of crack-cocaine ("balling up a hundred"). Hamilton told Concepcion that he (Hamilton) only had six clips left.

32. On or about July 23, 2014, at approximately 10:58 a.m., Concepcion, using the Concepcion 9434 Phone, placed a call to Clark at the Clark 4757 Phone. During that conversation, Concepcion asked Clark, "Somebody call the phone" (asking whether customers had called Cell Phone-1 for crack-cocaine)? Clark replied, "Uh, yeah, three people" (meaning that three customers had called Cell Phone-1).

33. On or about July 26, 2014, at approximately 2:34 p.m., Coelho, using a phone with a telephone number ending in 8096 (hereinafter, the "Coelho 8096 Phone"), placed a call to Concepcion at the Concepcion 9434 Phone. During that call, Concepcion and Coelho had the following exchange:

Concepcion: We might do something later on. I got like thirty left yo.

Coelho: Aight, so what you gonna hand it over to me?

Concepcion: You don't got nothing.

Coelho: Oh, I thought you had something for me.

Concepcion: No, I was trying. I want to do something I probably want to go down there.

Based on the content of this conversation and other intercepted communications, Concepcion told Coelho that he (Concepcion) had 30 clips of crack-cocaine left to sell. Coelho asked whether Concepcion was going to allow Coelho to sell crack-cocaine using Cell Phone-1, but Concepcion noted that Coelho did not have any crack-cocaine to sell. Concepcion then noted that he (Concepcion) had been trying to obtain a supply of crack-cocaine for Coelho to sell using Cell Phone-1.

34. Several months later, on or about October 3, 2014, law enforcement agents with the DEA arrested Williams, a supplier of heroin based in Newark, New Jersey. On or about October 3, 2014, at approximately 11:04 p.m., Arroyo, using the Arroyo 7977 Phone, received a call from Concepcion, who was using a phone with a telephone number ending in 5880 (hereinafter, the "Concepcion 5880 Phone"). During that conversation, Concepcion warned Arroyo:

Concepcion: Yo, be careful too, man. Buy a new phone tomorrow.

Arroyo: Alright.

Concepcion: Hey you, you hear me?

Arroyo: Yeah.

Concepcion: They came and got Toma, you heard? And, I, I know you probably be talking to Toma, so, you know what I'm saying?

Arroyo: Oh, I'm throwing this phone away. Alright, bye. Bye.

Based on the content of this conversation and previously intercepted communications, Concepcion warned Arroyo that Williams had been arrested by law enforcement and instructed Arroyo to change his phone to thwart any possible law enforcement investigation into Arroyo.

Protecting Their Drug Territory and Profits

35. On or about July 9, 2014, at approximately 12:53 p.m., Hamilton using the Hamilton 7498 Phone called Concepcion at the Concepcion 9434 Phone. During that call, Concepcion and Hamilton had the following exchange:

Hamilton: Yo, who the f***, who, who, who is that dude, bro?

Concepcion: Who?

Hamilton: Cutty Co.

Concepcion: I don't know. I thought ya knew him.

Hamilton: *I'm about to do something to that n****, son.*

(emphasis supplied). As the conversation continued, Concepcion stated that a customer had told him that "his shit is smoother" and "the shit we got is garbage." Hamilton replied, "I don't know how that n**** look, nothing bro. I want to do something to that n****, bro." When Concepcion noted that business was slow because "nobody call this phone yet, bro," Hamilton replied, "I'm about to get out of this bull, we about to do something bro." As the conversation continued, Hamilton and Concepcion had the following exchange:

Hamilton: Yeah, this shit is ridiculous bro.

Concepcion: Ain't nobody call this phone since yesterday. The last person to call this phone, I left the hood around six o'clock and I went to [a location]. When I left out there, from your house--

Hamilton: Yeah.

Concepcion: I went to [a location] and nobody never called the phone. I was with [another individual], I drive with Tah and Brazil after [the other individual] left. Brazil the phone and nobody called. He ain't sell not one ball and then when he gave me the phone when I was all the way in the house. The f***ing, ah, Stamp called he wanted twelve. He said, "I'ma call you in half-an-hour." Brazil stood outside till one o'clock in the morning he ain't never come.

Hamilton: Who wanted twelve? Stan?

Concepcion: Stamp, Stamp wanted twelve.

Hamilton: Oh. Yeah, *we about to f*** these streets up, bro. We about to get violent.*

Based on the content of these conversations, Hamilton and Concepcion discussed the fact that a rival dealer of crack-cocaine was siphoning away customers because customers were claiming that the rival's product was better ("his shit is smoother"). Hamilton and Concepcion then discussed how they had to do something, with Hamilton stating that he "want[ed] to do something to that n****" and that they were "about to get violent."

Use of Assault Rifles & Firearms

36. During the course of the investigation, DEA agents seized numerous firearms that were kept by members of the NJ Grape Street Crips, including the defendants, at the 6th Avenue Location as "community guns" that were easily accessible to gang members whenever the need to use them might arise.

37. For example, on or about May 8, 2014, DEA agents seized numerous assault rifles that had been hidden on a garage roof-top near the 6th Avenue Location, including:

- a. a black .410 caliber assault rifle manufactured by the Russian American Armory Company;
- b. a black .45 caliber Thompson semi-automatic carbine;
- c. a black 7.62 caliber assault rifle manufactured by S.N. Romarm S.A./Cugir; and
- d. a black 9mm Cobray semi-automatic pistol.

38. Other members of the Enterprise also were in possession of firearms during the course of the investigation. For example, on or about March 19, 2014, detectives with the Essex County Sheriff's Office, Bureau of Narcotics (hereinafter, "BON") observed Satchell walking in the vicinity of 4th Avenue and 11th Street in Newark, New Jersey, while holding a black plastic bag. As he approached the front stairway of a residence in the area, detectives observed Satchell look around nervously, crouch down, and place the black bag in an opening on the side of the stairway. After Satchell left the area, detectives located the black plastic bag that Satchell had been carrying and, inside the black plastic bag, found an FC .280 caliber semi-automatic pistol, serial number D05851, loaded with six rounds.

39. On or about April 28, 2014, law enforcement officers observed Foye and several other men in the area of 218 North 5th Street, which is at the 6th Avenue Location. As officers approached Foye, they observed him grab his waistband as if he were concealing or adjusting a concealed weapon. Foye then started running. Officers gave chase, identifying themselves as police officers. During the chase, officers observed Foye throw an item towards the roof of a large garage and, when the item fell, officers heard the sound of a metal object hitting the ground. After apprehending Foye, officers secured the item that Foye had thrown, which was

identified as a Baretta 92F 9mm semi-automatic pistol with approximately sixteen 9mm rounds. In addition, officers found that Foye had an additional empty 9mm magazine in his front right pocket and \$149.25 in United States currency.

40. On or about January 9, 2015, DEA agents seized a "community gun" that had been hidden underneath the front porch of a residence located at the 6th Avenue Location. It was a black and silver 9mm Ruger model p95, bearing serial number 317-89846, which was fully loaded with sixteen (16) rounds of ammunition.

41. On or about March 30, 2015, detectives with the Newark Police Department seized a 20-gauge Remington shotgun, model 1100LW, bearing serial number L657800K, inside a boarded-up house at 221 5th Street in Newark, New Jersey.

Vanderhall Orders Roberts and Valentine to Assault Victim-1

42. As noted above in Paragraph 11(c), Vanderhall is a senior member of the Grape Street Crips who operated at the 6th Avenue Location and supervised the other Grape Street Crips who engage in retail-level distribution of crack-cocaine and heroin at that location. As the most senior gang-member on the street at the 6th Avenue Location, Vanderhall also served as the enforcer. Vanderhall, Concepcion, Clark, and Hamilton worked together and shared sources of supply of crack-cocaine and heroin.

43. On or about August 19, 2014, at approximately 5:19 p.m., Vanderhall, who was using a phone with a telephone number ending in 6611 (hereinafter, the "Vanderhall 6611 Phone"), received an incoming call from Roberts, who was using a cell phone with a telephone number ending in 4724 (hereinafter, the "Roberts 4724 Phone"). During that conversation, Vanderhall and Roberts discussed Victim-1 and whether Victim-1 still "owe them." Vanderhall then instructed Roberts:

Vanderhall: Yeah, man, yeah *whop that n**** ass man*. Just go right like-- *dog that n***** right there bro. Where he at?

Roberts: Aight, aight. I'm about to ride right through there.

Vanderhall: Take a couple of n***** with f***--

(emphases supplied). Based on the content of this conversation and subsequently intercepted communications, Vanderhall instructed Roberts to physically assault Victim-1.

44. At approximately 5:23 p.m., Vanderhall, using the Vanderhall 6611 Phone, received a call from Valentine, who was using a phone with a telephone number ending in 4724 (hereinafter, the "Valentine 4724 Phone"). During that call, Valentine and Vanderhall had the following exchange:

Vanderhall: Bop, what up?

Valentine: Hey yo?

Vanderhall: Yo.

Valentine: Yo, this n**** . . . ah, he did some bullshit?

Vanderhall: Yeah, I just sent-- [Roberts] and them, I just told them to go *f*** that n**** up* where he at.

Valentine: Aight, aight, we about to go get him from the other side.

Vanderhall: Nah, *just whop his ass right there. Just dog him right there.*

Valentine: Aight, aight.

(emphases supplied). Based on the content of this conversation and other intercepted communications, Vanderhall instructed Valentine to physically assault Victim-1.

45. At approximately 5:34 p.m., Vanderhall, using the Vanderhall 6611 Phone, received a call from Roberts. Roberts told Vanderhall, "Shit done bro" (meaning that Victim-1 had been assaulted). Vanderhall said, "Aight." The call was then disconnected but Roberts called Vanderhall back, and the two had the following exchange:

Vanderhall: Yo?

Roberts: You can't come to the hood?

Vanderhall: I'm in the car with Wax. I'm in the area. Why what happened?

Roberts: Come to the hood-- we about to put him in the car.

Vanderhall: Oh, where ya at right now?

Roberts: We on the other side, but like, just come to the hood coz.

Vanderhall: Man, ya should've just whopped his ass right then and there.

Roberts: We did. We did. We did. *He bleeding right now, out his head and everything.*

Vanderhall: Aight, but leave him there. F*** him, he stole bro. Don't put him in no car. F*** him.

Roberts: Aight.

(emphasis supplied). Based on the content of this conversation and previously intercepted communications, Roberts asked Vanderhall to come to the 6th Avenue Location, and Vanderhall indicated that he was with Concepcion. Roberts then reported to Vanderhall that they had, in fact, physically assaulted Victim-1 and that Victim-1 was bleeding from his head. Vanderhall instructed Roberts to leave Victim-1 where he had been assaulted and not to put him in the car.

The Heroin Conspiracy

46. On or about July 5, 2014, at approximately 11:36 a.m., Hamilton, using the Hamilton 7498 Phone, spoke with Carnegie, who was using the Carnegie-Singleton Phone. Hamilton and Carnegie had the following exchange:

Carnegie: Shit, hey yo, um, you got some?

Hamilton: Yeah.

Carnegie: What's the name?

Hamilton: "Twenty-four seven" and some "venom," "venom." Shit, I just grabbed this "venom," "twenty-four seven" and "venom," I already know what the "venom" about, I just grabbed that shit.

Carnegie: I'm saying, what's the "twenty-four seven" about?

Hamilton: That's the, um, that shit, that shit rocking. *That's the one, um, you were f***ing with before.*

Carnegie: Aight yo, um, I'm saying, um, bring me something through, you heard?

Hamilton: Where are you, up top?

Carnegie: Yeah, I'm up top.

Hamilton: Aight, I'ma bout to. I'll be there in like five minutes.

Carnegie: Aight.

(emphasis supplied). Based on the content of this conversation and other intercepted communications, Carnegie asked Hamilton whether he (Hamilton) had any heroin. When Hamilton said that he did have heroin, Carnegie asked Hamilton about the stamps on the heroin that Hamilton was selling. Hamilton told Carnegie that he (Hamilton) had heroin stamped "twenty-four seven" and "venom." Hamilton told Carnegie that the heroin stamped "twenty-four

seven” was selling extremely well (“that shit rocking”) and told Carnegie that it was the same heroin that Carnegie had previously purchased from Hamilton (“you were f***ing with before”). Carnegie then asked Hamilton to bring him that heroin.

47. On or about July 5, 2014, at approximately 11:48 a.m., Concepcion, used the Concepcion 9434 Phone, to speak with Hamilton, who was using the Hamilton 7498 Phone. During that conversation, Concepcion asked Hamilton, “Where you at?” Hamilton replied, “I’m right here in front of Dew Hi’s house” (referring to Carnegie by his street name). Concepcion responded, “Oh, tell him I’ve been jamming to that, ah, “F**k her like a pornstar,” (referencing one of Carnegie’s hip-hop songs).¹³ Shortly thereafter, at approximately 11:51 a.m., Hamilton used the Hamilton 7498 Phone to call Carnegie, who was using the Carnegie 7784 Phone. Hamilton told Carnegie, “I’m outside.” Carnegie replied, “Aight.”

48. On or about July 5, 2014, at approximately 7:26 p.m., Carnegie—who was using a cell phone with a telephone number ending in 6982, which was registered in the name of coconspirator Singleton (hereinafter, the “Singleton 6982 Phone”), spoke with Hamilton, who was using the Hamilton 7498 Phone. During that conversation, Hamilton and Carnegie had the following exchange:

Carnegie: Hey yo, hey son, hey, I need you to come get up with me bro.

Hamilton: Aight, where you at?

Carnegie: Go for like the same shit. I’m up high, like, know what I mean, bring the same shit.

Based on the content of this conversation and other intercepted communications, Carnegie told Hamilton that he (Carnegie) needed to purchase additional bricks of heroin from Hamilton. Carnegie asked Hamilton to bring him bricks with the same stamp of heroin that Hamilton had sold to Carnegie earlier that day.

49. On or about July 11, 2014, at approximately 10:19 a.m., Concepcion used the Concepcion 9434 Phone, to speak with Hamilton. During that conversation, Concepcion stated, “First plea bargain, six flat that shit don’t make no sense, for a brick of dope.” Shortly thereafter, Hamilton asked Concepcion, “How did-- like the discovery was?” Concepcion said, “He said he’s going to let me copy all of that shit. I was like what’s the name of that heroin?”

¹³ Both Carnegie and Singleton, as well as other members of the NJ Grape Street Crips, use hip-hop songs to disseminate the rules and protocols of the Grape Street Crips. For example, in one song, Singleton states, “I’m fearless. I look death in his eyes, like I’m destined to die. Never ever snitch, like the rest of you guys. You let jail time get the best of you guys.” In the same song, Carnegie brags, “Fuck the feds, they ain’t stopping me. They tryina bury me with all that time, prosecutor has it out for me. I ain’t sitting in the County, I’m a pop bail, I’m a go to trial, I’m a pick twelve, fuck these crackers, I ain’t scared of no jail. Twenty-five to life, I ain’t takin no L” (or “loss”).

Concepcion then said, "And he looked and it's fifty bags of dope of 'Shaka Zulu.'" Based on the content of this conversation and local law enforcement reports, Concepcion informed Hamilton that he (Concepcion) had received the discovery and a plea offer in an outstanding state criminal case in which Concepcion had been charged for possession of heroin on or about April 4, 2014. Further, Concepcion was informing Hamilton that the heroin for which he had been charged was stamped "Shaka Zulu."

50. On or about July 11, 2014, at approximately 12:56 p.m., Hamilton, using the Hamilton 7498 Phone, spoke with coconspirator Williams. Hamilton asked Williams, "Yo! We had something called Zulu?" Williams responded, "Yeah." Hamilton asked, "Before?" Williams responded, "Yeah, remember like in the beginning." When Hamilton asked, "It was black," referring to the color of the heroin stamp, Williams stated, "Exactly." Based on the content of this call and on the conversation discussed in the previous paragraph between Hamilton and Concepcion, Hamilton asked Williams whether Williams had ever supplied Concepcion and/or Hamilton with heroin with the stamp "Zulu." Williams responded affirmatively.

51. On or about July 11, 2014, at approximately 12:57 p.m., Hamilton, using the Hamilton 7498 Phone, spoke with Concepcion, who was using the Concepcion 9434 Phone. During that conversation, Hamilton told Concepcion, "That shit was a minute ago he said," referring to Hamilton's conversation with Williams. Concepcion replied, "I called him and I said, 'Shaka Zulu,' and he's like, 'Yeah.' He's like, 'yo, why?' I told him." Hamilton responded, "He just called me and I asked him and he said like a minute ago." Concepcion then stated, "I asked him, 'We had something called 'Shaka Zulu,' and he was like, 'That was a minute ago.'" Based on the content of this conversation and on other intercepted communications, Hamilton and Concepcion discussed their separate conversations with Williams and the fact that Williams had told them each that he (Williams) had previously supplied them with heroin stamped with the label "Shaka Zulu."

52. On or about July 15, 2014, at approximately 3:47 p.m., Hamilton, used the Hamilton 7798 Phone, to speak with Gutierrez, who was using a cell phone with a telephone number ending in 8833 (hereinafter, the "Gutierrez 8833 Phone"). Hamilton told Gutierrez, "Hey, this my number right here News." Gutierrez replied, "This Gunner?" Hamilton said, "Yeah, I'm bout to grab it up for you right now. I'ma shoot down--." Gutierrez responded, "Aight, aight, yeah, cause I got my man waiting but he gon wait though so I'm just waiting on you so I could, I can handle it then shoot to court. You heard, son?" Hamilton said, "Aight." Based on the content of this conversation and other intercepted communications, Hamilton told Gutierrez that he (Hamilton) was about to take a quantity of heroin to Gutierrez, and Gutierrez told Hamilton that he (Gutierrez) had a customer ("my man") waiting.

53. On or about July 16, 2014, at approximately 6:17 p.m., Hamilton, used the Hamilton 7498, spoke with Butler, who was using a phone with a telephone number ending in 0712 (hereinafter, the "Butler 0712 Phone"). Hamilton and Butler had the following exchange:

Butler: What's up Gun? You still, you still out?

Hamilton: Nah, I slid off, what happen?

Butler: Oh, no, I need another load.

Hamilton: Damn, I slid off, S-Dot, you can't--

Butler: Damn.

Hamilton: Hold off until tomorrow?

Butler: Ah, but I ain't going to have none. [U/I] for a whole [U/I] I actually wanted six.

Hamilton: You sold that shit that fast?

Butler: It's, it's, that shit gone.

Based on the content of this conversation and other intercepted communications, Butler asked Hamilton whether Hamilton could sell Butler six additional bricks of heroin. Hamilton remarked that Butler had quickly sold the bricks that Butler had bought from Hamilton.

54. On or about July 18, 2014, at approximately 12:33 p.m., Hamilton used the Hamilton 7498 Phone to speak with Butler, who was using the Butler 0712 Phone. During that conversation, Butler asked Hamilton to "bring me two loads." Hamilton replied, "Aight, hold on, let me see if I could get somebody to bring it to you. Let me see, I'll call you right back." Shortly thereafter, Hamilton used the Hamilton 7498 Phone to speak with Concepcion, who was using the Concepcion 0285 Phone. Hamilton asked, Concepcion, "Go see S-Dot, give him the two loads." Concepcion replied, "Aight." At approximately 12:37, Hamilton spoke with S-Dot and told Butler that "Wax" (i.e., Concepcion) would be delivering the bricks of heroin.

**Other Grape Street Crips Members:
Retail-Level Crack-Cocaine Distributors**

55. Numerous other members of the NJ Grape Street Crips purchased clips of crack-cocaine from coconspirator Concepcion, Hamilton, Clark, and Coelho, and then distributed individual hits or "cookies" of crack-cocaine (one clip contains ten hits or "cookies" of crack-cocaine) to retail-level customers in and around the 6th Avenue Location.

Willie T. Brooks

56. On or about May 29, 2014, at approximately 6:20 p.m., Brooks, using a phone with a telephone number ending in 9666 (hereinafter, the "Brooks 9666 Phone"), spoke with Concepcion at Cell Phone-1. Brooks and Concepcion had the following exchange:

Concepcion: Animal, give me twenty minutes.

Brooks: Huh?

Concepcion: Twenty minutes.

Brooks: Twenty is too long. My man will be gone. Aight.

Concepcion: Aight.

Based on the content of this conversation and other intercepted communications, Brooks called Concepcion in order to purchase a quantity of crack-cocaine that Brooks intended to resell to his customer (“[m]y man”).

57. On or about June 2, 2014, at approximately 3:19 p.m., Brooks used the Brooks 9666 Phone to speak with Hamilton at Cell Phone-1. Brooks and Concepcion had the following conversation:

Brooks: How long? How long? Cause I don’t want [U/I]--

Hamilton: Chill son, I’m right here bro. I hate when you do that bro.

Brooks: No listen, nah, cause they put, they put a eagle out on 5th. I don’t want to stand here no more.

Previously intercepted communications between indicate that Brooks had called Hamilton to order crack-cocaine and had been waiting for Hamilton to deliver it. In this conversation, Brooks called Hamilton to warn him that law enforcement had put a pole camera (“a[n] eagle”) near the 6th Avenue Location.

58. On or about June 28, 2014, at approximately 2:00 p.m., Brooks used the Brooks 9666 Phone to speak with Hamilton at Cell Phone-1. During that call, Brooks and Hamilton had the following exchange:

Brooks: Who this? Gunner?

Hamilton: What’s good?

Brooks: Where Wax at? What the f*** was that he gave me son?

Hamilton: I don’t know.

Brooks: All that powdery shit, son. Huh?

Hamilton: Chill out man, chill out man.

Brooks: Nah, chill, cause I had that shit-- I just had to go with [U/I].

Hamilton: Yo, but chill son.

Brooks: [U/I] brah.

Hamilton: You, you on the phone, brah.

Based on the content of this conversation and other intercepted communications, Brooks called Hamilton to complain about the quality of the crack-cocaine that Concepcion had just sold to Brooks (“[a]ll that powdery shit”). Hamilton then warned Brooks not to speak so overtly over the phone (“you on the phone, brah”).

59. On or about June 29, 2014, at approximately 4:45 p.m., Brooks used the Brooks 9666 Phone to speak with Clark at Cell Phone-1. During that call, Brooks told Clark, “Yo, I need one. I need some. Where you at” (meaning that Brooks needed to purchase 1 clip of crack-cocaine). Clark responded, “Where-- I just told you where I was bro.” Brooks then said, “I’m about to come [U/I] house real quick. Bout to come down.”

60. On or about July 11, 2014, at approximately 10:15 p.m., Brooks used the Brooks 9666 Phone to speak with Coelho, who was using Cell Phone-1. Coelho and Brooks had the following exchange:

Brooks: You got two on you?

Coelho: What?

Brooks: Two. Clips.

Coelho: Where you at?

Brooks: I’m a bout to count my money and I’ll call you right back.

Coelho: Aight, I’m on 3rd. Hurry up, cause I’m a go in the house. I only got like four left. Hurry up.

Brooks: Aight.

Based on the content of this conversation and other intercepted communications, Brooks asked Coelho whether Coelho had 2 clips of crack-cocaine to sell to Brooks. Coelho told Brooks to hurry up because he (Coelho) only had 4 clips of crack-cocaine left to sell.

61. On or about August 16, 2014, at approximately 11:04 p.m., Brooks used the Brooks 9666 Phone to speak with Vanderhall at the Vanderhall 6611 Phone. Brooks then warned Vanderhall, “Yo, bro, Crown Vic coming up 6th Street.” Vanderhall responded, “Aight.” Based on the content of this conversation and other intercepted communications, Brooks warned Vanderhall that a law enforcement vehicle was driving through the 6th Avenue Location.

62. On or about August 19, 2014, at approximately 7:00 p.m., law enforcement officers observed Brooks meet with an individual (hereinafter, "Individual-2") in the area of North 5th Street in Newark, New Jersey. Officers observed Brooks remove an item from his right front pocket and hand the item to Individual-2 in exchange for an amount of U.S. currency. Shortly thereafter, law enforcement officers arrested Brooks and Individual-2. Brooks had \$20 of United States currency, and Individual-2 had one zip-lock bag containing crack-cocaine.

63. Shortly after Brooks was arrested, at approximately 7:27 p.m., Valentine, using a cell phone with a telephone number ending in 8297 (hereinafter, the "Valentine 8297 Phone"), sent a text message to Vanderhall at the Vanderhall 6611 Phone, stating: "They took animal." Based on the content of this conversation, Valentine was alerting Vanderhall that law enforcement had arrested Brooks.

Max Larue

64. On or about June 14, 2014, at approximately 1:17 p.m., Larue, using a phone with a telephone number ending in 4897 (hereinafter, the "Larue 4897 Phone"), called Clark at Cell Phone-1. During that call, Larue said, "Hey bro, I'm in front of [U/I] I need two" (meaning that Larue wanted to purchase 2 clips of crack-cocaine). Clark agreed.

65. On or about June 18, 2014, at approximately 8:07 p.m., Larue using the Larue 4897 Phone called Coelho at Cell Phone-1. During that call, Larue and Coelho had the following conversation:

Larue: Hey, brah, don't come down, don't come down 4th because po-po [U/I]

Coelho: Yeah, I know. Yo, I'm on, I'm right here, you know, on Main, gonna be on 2nd.

Larue: Aight, I'mma walk over there.

Based on the content of this conversation and previously intercepted communications, Larue and Coelho agreed to meet so that Coelho could sell crack-cocaine to Larue. Larue, however, warned Coelho not to go to 4th Avenue because of police presence ("po-po").

66. On or about July 18, 2014, at approximately 6:57 p.m., Larue using the Larue 4897 Phone called Hamilton at Cell Phone-1. During that call, Larue and Hamilton had the following exchange:

Larue: Where you at bro?

Hamilton: I just got the phone. I'm about to go get that for you now. What you wanted?

Larue: I wanted one.

Hamilton: Oh yeah. I'm about to go get that now.

Larue: Aight.

Based on the content of this conversation and other intercepted communications, Larue told Hamilton that he wanted to purchase 1 clip of crack cocaine.

67. On or about August 3, 2014, at approximately 8:55 p.m., Larue using the Larue 4897 Phone called Clark at Cell Phone-1. During that call, Larue asked Clark for "four" (meaning that he wanted to purchase 4 clips of crack-cocaine). Clark replied, "Aight."

68. On or about September 25, 2014, at approximately 11:52 a.m., Larue using a telephone number ending in 9397 (hereinafter, the "Larue 9397 Phone") called Arroyo, who was using a cell phone with a telephone number ending in 7977 (hereinafter, the "Arroyo 7977 Phone"). During that conversation, Max asked Arroyo, "Where you at, bro?" When Arroyo, in turn, asked Larue where he was, Larue said, "I'm about to be on 6th Ave and 5th." Arroyo responded, "Aight. Call me when you're there. I'm riding around." Based on the content of this conversation and other intercepted communications, Larue called Arroyo in order to purchase a quantity of crack-cocaine from Arroyo.

Darrell Johnson

69. Johnson was arrested and charged on or about January 6, 2014, on or about May 8, 2014, and on or about May 28, 2014, in possession of distribution quantities of heroin and/or crack-cocaine.

70. On or about June 4, 2014, at approximately 5:09 p.m., Johnson, using the Johnson 7204 Phone, spoke with Clark, who was using Cell Phone-1. During that call, Johnson and Clark had the following exchange:

Clark: Yo.

Johnson: Yo, bring two balls through.

Clark: Aight.

Based on the content of this call and other intercepted communications, Johnson asked Clark to bring 2 clips of crack-cocaine, and Clark agreed.

71. On or about July 9, 2014, at approximately 9:11 p.m., Johnson used the Johnson 7204 Phone to speak with Concepcion on Cell Phone-1. Concepcion and Johnson had the following conversation:

Johnson: Hey Wax, you still out?

Concepcion: Uh, yeah. How many ya'll wanted?

Johnson: Um, three.

Concepcion: Aight, come on, come on, ah, 3rd. How long you gonna take?

Johnson: Aight, I'ma bout to be um, I'm gonna be right there.

Based on the content of this call and other intercepted communications, Johnson asked Concepcion for 3 clips of crack-cocaine, and Concepcion agreed.

72. On or about July 11, 2014, at approximately 10:00 p.m., Johnson used the Johnson 7204 to speak with Coelho on Cell Phone-1. Concepcion and Coelho had the following exchange:

Coelho: Yo.

Johnson: Ey yo, ya'll still out?

Coelho: Yeah, pull by the park.

Johnson: [Coconspirator-4] want two.

Coelho: Who?

Johnson: [Coconspirator-4], she on 4th Ave.

Coelho: She on 4th Ave and what?

Johnson: And 11th.

Coelho: Aight, I'ma bout to pull around there.

Based on the content of this call and other intercepted communications, Johnson told Coelho that Coconspirator-4 needed to purchase 2 clips of crack-cocaine, and Coelho stated that he would sell it to her.

73. On or about July 29, 2014, at approximately 6:06 p.m., Johnson used the Johnson 7204 to speak with Clark on Cell Phone-1. Johnson and Clark had the following exchange:

Johnson: You still outside?

Clark: Yeah, where you at?

Johnson: I'm still right here on Third. I need two more, you heard?

Clark: I'll be right there.

Based on the content of this call and other intercepted communications, Johnson told Clark that he (Johnson) needed 2 more clips of crack-cocaine.

74. On or about September 21, 2014, at approximately 19:19 p.m., Johnson used the Johnson 7204 to speak with Arroyo at the Arroyo 7977 Phone. During that conversation, Johnson told Arroyo, "How far is you, bro? It's like four of us." Arroyo said, "Alright, give me like 10 minutes, and I told you I'll be there." Johnson replied, "Well we got somebody-- Alright, bro." Based on the content of this call and other intercepted communications, Johnson called Arroyo because Johnson and three of Johnson's associates had a customer ("we got somebody") who wanted to purchase a quantity of crack-cocaine.

Jarod Ravenell

75. On or about May 29, 2014, at approximately 5:24 p.m., Ravenell, who was using a cell phone with telephone number ending in 8740 (hereinafter, the "Ravenell 8740 Phone"), spoke with Hamilton at Cell Phone-1. During that conversation, Ravenell and Hamilton had the following exchange:

Hamilton: I'mma come over, bro. I'm waiting for these State boys right here like--

Ravenell: Aight. Aight.

Hamilton: I'm waiting for them to leave. When they pull out, I'mma come over there.

Based on the content of this conversation and other intercepted communications, Ravenell asked Hamilton whether Hamilton was out serving narcotics customers ("you out rollin?"). Hamilton replied that he would leave to deliver the crack-cocaine to Ravenell as soon as law enforcement left the area ("these State boys right here").

76. On or about June 17, 2014, at approximately 7:44 p.m., Ravenell, using the 8740 Phone, spoke with Coelho at Cell Phone-1. During that conversation, Coelho and Ravenell had the following exchange:

Coelho: Yo, how it looked?

Ravenell: Yeah, yeah, yeah, we good, come through.

Coelho: Pull up the top.

Ravenell: You heard? I'm at the top.

Coelho: I said, I'ma bout to pull up on top.

Ravenell: Aight, I'm at the top.

Coelho: What's the count, yo?

Ravenell: Yo.

Coelho: The count?

Ravenell: Two, two piece, two piece,

Coelho: Aight.

Based on the content of this conversation and other intercepted communications, Ravenell told Coelho that law enforcement was not in the area ("we good, come through") and that Coelho could bring a quantity of crack-cocaine to Ravenell. Ravenell asked to purchase 2 clips of crack-cocaine.

77. On or about June 19, 2014, at approximately 10:35 p.m., Ravenell used the Ravenell 8740 Phone to call Coelho at Cell Phone-1. Ravenell asked Coelho, "Where you at bro?" Coelho responded, "I'ma bout to come see you right now." Ravenell replied, "Aight." Based on the content of this conversation and other intercepted communications, Ravenell called Coelho to purchase a quantity of crack-cocaine.

78. On or about June 28, 2014, at approximately 2:05 p.m., Ravenell used the Ravenell 8740 Phone to call Hamilton at Cell Phone-1. During that conversation, they had the following conversation:

Ravenell: What's good my boy? Ya'll rollin?

Hamilton: Yeah, just go to the top. I'ma bout to pull up.

Ravenell: Aight.

Based on the content of this conversation and other intercepted communications, Ravenell asked Hamilton whether Hamilton was serving narcotics customers ("ya'll rollin?"). Hamilton and Ravenell then make plans to meet.

79. On or about June 30, 2014, at approximately 2:46 p.m., Ravenell used the Ravenell 8740 Phone to call Clark at Cell Phone-1. During that conversation, they had the following conversation:

Clark: I'm like three minutes away, brah.

Ravenell: Aight, I was about to saw, ya'll want me to come to ya'll.

Clark: Nah, I'm right here. I'm, I'm, I'm already over here, son.
I'm, I'm like two minutes away.

Ravenell: Aight. I'm right here by the mechanic shop.

Based on the content of this conversation and other intercepted communications, Ravenell and Clark discussed meeting in order to consummate a crack-cocaine transaction.

Antonio Foye

80. The investigation has revealed that Foye sold both heroin and crack-cocaine at or around the 6th Avenue Location.

81. On or about June 10, 2014, at approximately 8:48 p.m., Foye, who was using a cell phone with a telephone number ending in 1884 (hereinafter, the "Foye 1884 Phone"), placed a call to Concepcion at Cell Phone-1. During that conversation, Foye stated, "I need twelve dollars" (meaning that he needed to purchase 12 clips of crack-cocaine." Concepcion responded, "Aight, come through."

82. On or about July 2, 2014, at approximately 5:48 p.m., Foye, using the Foye 1884 Phone, spoke with Concepcion, who was using Cell Phone-1. Foye and Concepcion had the following exchange:

Foye: I'm outside on the Ave. Police out here too.

Concepcion: What kind of police?

Foye: Sergeant. I'm on 7th though. They on [U/I]. It's a sergeant truck and a blue BON car.

Concepcion: What kind of truck you said?

Foye: The sergeant truck and a blue BON car.

Based on the content of this conversation and other intercepted communications, Foye warned Concepcion that law enforcement was near the 6th Avenue Location. Specifically, Foye told Concepcion that a Newark Police Department truck and a BON car were in the area.

83. On or about July 9, 2014, at approximately 1:13 p.m., Hamilton using the Hamilton 7498 Phone received a call from a coconspirator (hereinafter, "Coconspirator-3"). Coconspirator-3 and Hamilton had the following conversation:

Hamilton: How are things coming along?

CC-3: It's-- they buying bag to bag though. They liked it but you know it ain't no bundle sale. I ain't no grease-ball types. I'm, I'm, they said this shit the best shit around but they just buying bag for bag. I'm just keeping it out here so when they do start [U/I] I know. I'm not no grease-ball man you know that. They buying bag for bag right now.

Hamilton: I'm just asking how it's going, I'm just asking how it's going.

CC-3: Huh? Huh?

Hamilton: I'm just asking how it's going.

CC-3: Oh, they said it's the best shit around. That's "twenty-four seven," not that shit you gave Steel.

Hamilton: Alright.

CC-3: You got more of that?

Hamilton: I'm waiting on it now.

CC-3: They said that's shit, that's the best shit around.

Based on the content of this conversation and other intercepted-communications, Hamilton and Coconspirator-3 were discussing the speed at which Coconspirator-3 was selling bags or decks of heroin and that quality of the heroin. Coconspirator-3 told Hamilton that customers had said that the heroin was the best around but that customers were still only buying it by the "bag" rather than by the "bundle." Coconspirator-3 further told Hamilton that heroin stamped "twenty-four seven" was the "best shit around," unlike that heroin that Hamilton had sold to Foye (Steel) and that Foye was distributing.

84. On or about July 14, 2014, at approximately 6:29 p.m., Hamilton using the Hamilton 7498 Phone called Foye, who was using the Foye 1884 Phone. During that conversation, Hamilton and Foye had the following exchange:

Foye: Who's this?

Hamilton: It's Gunner.

Foye: Oh, Gunner, what's up cous?

Hamilton: You still ain't shake that off?

Foye: I got three left.

Hamilton: Man, you might as well let me come get them, shake them off man. You moving like [Coconspirator-3].

Foye: Nah, [U/I], I can. You heard me. I'm trying. My phone working.

Hamilton: Nah, ah, aight, just, just, um, I can switch them for you anyway too. I can switch them for you if you want.

Foye: Aight, yeah, do that.

Hamilton: To move them faster.

Foye: Aight do that for me.

Hamilton: Aight, I'ma call you.

Foye: I'm here in the hood.

Based on the content of this conversation and previously-intercepted communications, Hamilton asked Foye whether Foye had sold the bricks of heroin that Hamilton had provided to Foye. Foye indicated that he still had three bricks left. Hamilton told Foye that he would take back those three and give Foye a different stamp of heroin so that Foye would "move them faster."

Tauheed Satchell

85. On or about May 29, 2014, at approximately 12:16 p.m., Satchell, using a cell phone with a telephone number ending in 5301 (hereinafter, the "Satchell 5301 Phone"), spoke with Concepcion, who was using Cell Phone-1. During that conversation, Satchell told Concepcion, "Eh, yo, mo' f***ing uhm, Sammy only got charged with uh-- like four clips and two paper." Concepcion replied, "That's good then." Satchell said, "I was-- look, when I heard, you call me early this morning, I'm like, 'Damn.' I thought something, I thought you, I thought something crazy had happened or some shit. You feel me? That's why I was like, 'Damn, I got--' That's why I was calling you and calling you and shit." Based on the content of this conversation and other intercepted communications, Satchell informed Concepcion that Cureton, charged elsewhere, had been arrested.

86. As the conversation continued, Satchell warned Concepcion about law enforcement presence in the area, stating, "But look yo, they was out here in the block um, a black Impala and the gray Avenger and mo' f***ing, uh, a silver, bluish, uh, Pacifica, the Chrysler shit, the one with can type shit." Concepcion replied, "That's State police" (referring to officers with the New Jersey State Police).

87. On or about May 29, 2014, at approximately 3:54 p.m., Satchell used the Satchell 5301 Phone to speak with Concepcion, who was using Cell Phone-1. During that conversation, Satchell and Concepcion had the following exchange:

Satchell: Hey big brah.

Concepcion: Yo.

Satchell: Hey yo, I was about to tell you, yo, if somebody call you and try to get you to come up here, here, on 4th Ave, for you to come see em, don't go up here, cause n***** acting like they ain't, they don't see this mo' f***ing blue pick-up truck that sit right here on 4th Ave and the 11th Street corner. And--

Concepcion: Yeah, I've seen--

Satchell: Yeah, look, I'm sitting right there on the porch and shit, everybody, n***** still on the corner and shit, they snapping pictures though. I saw the flash and everything. They snapping pictures my n****. I'm trying to tell n*****. I don't want them to call you and you come up here on some dumb shit. Don't even listen to none of them n***** yet, big brah.

Concepcion: Aight, cause I seen that car three times in the hood.

Satchell: Don't even come through there at all my n****.

Based on the content of this conversation and previously intercepted communications, Satchell warned Concepcion not to drive through Satchell's neighborhood in order to serve customers with crack-cocaine because of law enforcement presence in the area.

88. On or about June 5, 2014, at approximately 12:43 p.m., Satchell used the Satchell 5301 Phone to speak with Hamilton who was using Cell Phone-1. Satchell and Hamilton had the following exchange:

Satchell: Yo, you could come through?

Hamilton: You gotta give me a few minutes, big boss.

Satchell: Aight.

Hamilton: Yo.

Satchell: Yo.

Hamilton: What street number?

Satchell: 4th and 12th.

Hamilton: Nah man, think about it. What street number?

Satchell: Oh, oh, two, two [laughs], two [laughs].

Hamilton: Aight.

Based on the content of this conversation and previously intercepted communications, Satchell asked Hamilton to meet Satchell so that Satchell could purchase a quantity of crack-cocaine. Thereafter, Hamilton used code (“what street number”) to ask Satchell how many clips of crack-cocaine Satchell wished to purchase. When Satchell responded without understanding the code, Hamilton told Satchell to “think about it.” Satchell then laughed and told Hamilton that he wanted 2 clips of crack-cocaine.

89. On or about June 24, 2014, at approximately 4:19 p.m., Satchell, using the Satchell 5301 Phone, spoke with Concepcion who was using Cell Phone-1. During that conversation, Satchell and Concepcion had the following conversation:

Concepcion: Where you at?

Satchell: I’m in the car. Where you at?

Concepcion: I’m about to come around. I’mma come, I’mma, I’mma [U/I]. I’mma call him about something else.

Satchell: Damn. Motherf***in, cause my dude gonna be gone then. I’mma hit you, I’mma hit you when, uh, when my other mans called me, aight? Cause I don’t wanna waste your time.

Concepcion: Aight.

Based on the content of this conversation and other intercepted communications, Satchell called Concepcion because he (Satchell) had a customer (“my dude”) who wanted to purchase a quantity of crack-cocaine, but might be gone by the time Concepcion arrived with the narcotics. Satchell then told Concepcion that he (Satchell) would call Concepcion when another customer called him.

90. On or about July 8, 2014, at approximately 1:05 p.m., Satchell, using the Satchell 5301 Phone, spoke with Concepcion who was using Cell Phone-1. Satchell asked if Concepcion could “come through” and said that he (Satchell) “need[ed] one” (referring to 1 clip of crack-cocaine).

Rakeem Hankerson

91. On or about June 20, 2014, at approximately 9:07 p.m., Hankerson, using a phone with a telephone number ending in 2862 (hereinafter, the "Hankerson 2862 Phone"), spoke with Concepcion at Cell Phone-1. Hankerson and Concepcion had the following exchange:

Concepcion: Yo. Wassup, Rocco?

Hankerson: Right here on 6th Street.

Concepcion: Yo, come to 3rd, yo. Come to 3rd. Ramos keeps snooping around and shit.

Hankerson: Where, to the other side?

Concepcion: Nah, I'm right here by the park.

Hankerson: Aight.

Based on the content of this conversation and other intercepted communications, Hankerson called Concepcion in order to purchase a quantity of crack-cocaine. Concepcion instructed Hankerson to meet him at a different location because a police officer with the Newark Police Department was in the area.

92. On or about June 26, 2014, at approximately 7:21 p.m., Hankerson used the Hankerson 2862 Phone to speak with Concepcion at Cell Phone-1. Hankerson and Concepcion had the following conversation:

Hankerson: Hey yo, you around 3rd?

Concepcion: Where you at right now?

Hankerson: I'm in a car, I can come and see you.

Concepcion: Come on Orange and 5th by the bar, Orange and 5th Street.
How many you want, so I can get them out?

Hankerson: You said, "Orange and 5th"?

Concepcion: Yeah. How many you want? So I can get them out.

Hankerson: One.

Concepcion: Aight.

Based on the content of this conversation and other intercepted communications, Hankerson called Concepcion in order to purchase 1 clip of crack-cocaine.

93. On or about July 28, 2014, at approximately 5:33 p.m., Hankerson used by the Hankerson 2862 Phone to speak with Hamilton at Cell Phone-1. Hamilton and Hankerson had the following conversation:

Hamilton: Wassup Rocco?

Hankerson: Yeah, hey bra, you coming by the building?

Hamilton: Yeah. What you want me to do?

Hankerson: Need one.

Hamilton: What? A bundle or a ball?

Hankerson: Ball.

Hamilton: Aight, I'ma pull up driving.

Based on the content of this conversation and other intercepted communications, Hankerson called Hamilton to purchase narcotics. Hamilton asked Hankerson whether Hankerson wanted to purchase 1 bundle or heroin or 1 ball or clip of crack-cocaine. Hankerson stated that he wanted 1 ball or clip.

94. On or about July 29, 2014, at approximately 12:47 a.m., Hankerson used by the Hankerson 2862 Phone to speak with Coelho at Cell Phone-1. Hankerson and Coelho had the following conversation:

Coelho: What you wanted?

Hankerson: One.

Coelho: Aight, give me one minute.

Based on the content of this conversation and other intercepted communications, Hankerson called Coelho in order to purchase 1 clip of crack-cocaine.

Ernest Valentine

95. On or about May 24, 2014, at approximately 10:11 p.m., Valentine, using the Valentine 8297 Phone, attempted to place a telephone call. While the phone rang but before the other caller answered the call, Valentine said, "Man, that n**** just bought twenty five bags off me, bro. Same, dude. He bought all mines and bought [U/I]. Nah, he bought, like, eight off him." Based on the content of this conversation and other intercepted communications,

Valentine was explaining that a customer had just purchased from him over 2 clips of crack-cocaine.

96. On or about May 30, 2014, at approximately 2:54 p.m., Valentine used the Valentine 8297 Phone to speak with Concepcion, who was using Cell Phone-1. During that conversation, Valentine said, "Yo, I'm on 3rd Street, bro." Concepcion replied, "I'm about to come around right now. What's your number" (asking how many clips of crack-cocaine Valentine wanted to purchase). Valentine replied, "Three" (indicating that he wanted to purchase 3 clips of crack-cocaine).

97. On or about June 13, 2014, at approximately 10:58 p.m., Valentine used the Valentine 8297 Phone to speak with Clark, who was using Cell Phone-1. Valentine and Clark had the following conversation:

Clark: Yo, wassup, Bop. Where you at?

Valentine: I'm right here by the townhouses.

Clark: Aight, be right there. What you wanted?

Valentine: Four.

Clark: Aight.

Based on the content of this conversation and other intercepted communications, Valentine placed an order from Clark for 4 clips of crack-cocaine. Clark explained that he would deliver the crack-cocaine shortly.

98. On or about July 16, 2014, at approximately 3:12 p.m., Valentine used the Valentine 8297 Phone to speak with Concepcion, who was using Cell Phone-1. During that conversation, Valentine asked Concepcion, "Yo, where you at bro?" Concepcion replied, "I'm about to get off [U/I], where you at?" When Valentine said, "I'm right here on 6th Avenue," Concepcion told him, "Aight, like in twenty minutes, you want to meet me on 3rd." Valentine agreed. Shortly thereafter, at approximately 3:18 p.m., Valentine and Concepcion spoke again and had the following exchange:

Valentine: Yo, where you at?

Concepcion: Give me a few minutes. I'm dropping somebody off, by Norfolk, I'll be right there.

Valentine: Huh?

Concepcion: Dropping somebody off by Norfolk and I'ma come right there.

Valentine: Aight, come on papi, *I got somebody waiting for me* man.

Concepcion: Aight, I'm coming, I'm coming, yo.

(emphasis supplied). Based on the content of these conversations and other intercepted communications, Valentine called Concepcion to order a quantity of crack-cocaine. When Concepcion had not arrived with the delivery of crack-cocaine, Valentine told Concepcion that he (Valentine) had a crack-cocaine customer who was waiting for the drugs.

99. In fact, at approximately 3:48 p.m., law enforcement officers with the DEA were conducting physical surveillance in the 6th Avenue Location and they observed Concepcion and Valentine meet. At the same time, Valentine called Concepcion. While the phone rang but before Concepcion answered the phone, Valentine said to someone in his presence, "That was them yo. In that truck. They just saw Wax and them serve me and everything" (referring to law enforcement officers observing Concepcion and others deliver the crack-cocaine to Valentine). When Concepcion answered, he and Valentine had the following exchange:

Valentine: Yo, that was them, brah.

Concepcion: Where'd they go?

Valentine: They just came back around. They just came-- they went on to 3rd down 4th.

Concepcion: Yeah, they--

Valentine: Two white boys. That's definitely them though.

Concepcion: What that's BON or that's, like, State boys.

Valentine: Nah, that look like State boys, or it could be BON. Just look for the same kind of truck as that one, they--

Concepcion: Where they, which way they went now?

Valentine: They just went down 4th Street. They came on to 3rd and went down 4th.

Based on the content of these conversations and previously intercepted communications, Valentine called Concepcion—after Concepcion had delivered crack-cocaine to Valentine—to warn Concepcion of law enforcement presence in the area.

100. On or about August 5, 2014, at approximately 1:09 p.m., Valentine used the Valentine 8297 Phone to speak with Concepcion, who was using Cell Phone-1. Concepcion asked, "How many ya wanted," and Valentine replied, "Two" (meaning that Valentine wanted to purchase 2 clips of crack-cocaine from Concepcion). Concepcion responded, "Two, aight. You

ain't see the State boys around there, right" (referring to local law enforcement officers). Concepcion and Valentine then agreed to meet "in the middle" of 5th Avenue.

101. On or about August 6, 2014, at approximately 6:44 p.m., Valentine used the Valentine 8297 Phone to speak with Clark, who was using Cell Phone-1. Clark and Valentine had the following conversation:

Clark: Bop, where you at, Bop?

Valentine: On my way to the area. You can meet me on 3rd?

Clark: Aight, I'll be on 3rd. Uh, what's the number?

Valentine: Three.

Clark: Aight, I'll be on 3rd.

Based on the content of this conversation and other intercepted communications, Valentine asked Clark to sell him 3 clips of crack-cocaine and the two men agreed to meet at 3rd Avenue to do the transaction.

Trae K. Roberts

102. On or about March 17, 2014, at approximately 5:55 p.m., law enforcement officers observed Roberts standing in front of a residence at the 6th Avenue Location. Officers observed Roberts meet an unidentified male. After being approached by the unidentified male, officers saw Roberts walked to the gate of a nearby residence, reach for an object, and walk back to the unidentified male. Roberts and the unidentified male then engaged in what appeared to be a hand-to-hand drug transaction. Shortly thereafter, officers searched the area in the vicinity of the gate that Roberts had walked to after being approached by the unidentified male and found a black magnetic key box containing 26 zip-lock baggies containing a white rock-like substance that field-tested positive for the presence of crack-cocaine.

103. On or about June 20, 2014, at approximately 5:47 p.m., Concepcion, using Cell Phone-1, received a call from Roberts, who was using the Roberts 4724 Phone. Concepcion and Roberts had the following exchange:

Concepcion: Hella?

Roberts: Yo.

Concepcion: Who this?

Roberts: This Trae Pound. Come to 5th brah.

Concepcion: I'm about to leave [an individual's] house right now.

Roberts: Aight.

Shortly thereafter, at approximately 5:58 p.m., Roberts called Concepcion to see whether Concepcion was on his way to meet Roberts. Based on the content of these conversations, on previously-intercepted communications, and on other conversations between Roberts and Cell Phone-1, Roberts called Concepcion to place an order for clips of crack-cocaine.

104. On or about July 5, 2014, at approximately 1:28 p.m., Hamilton, who was using Cell Phone-1, received a call from Roberts, who was using the Roberts 4724 Phone. Hamilton and Roberts had the following conversation:

Hamilton: Ey yo.

Roberts: Yo.

Hamilton: Wassup, Trae Pounds?

Roberts: Yo.

Hamilton: Wassup? Wassup, Trae Pounds?

Roberts: Un, the ni**ers on Norfolk need you. Norfolk, he right here.

Based on the content of this conversation and on previously intercepted communications, Roberts told Hamilton that individuals near Norfolk Avenue needed to purchase crack-cocaine.

105. On or about July 20, 2014, at approximately 3:04 p.m., Hamilton, who was using Cell Phone-1, received a call from Roberts, who was using the Roberts 4724 Phone. During that conversation, Hamilton and Roberts had the following exchange:

Roberts: Yo.

Hamilton: Yeah.

Roberts: Meet me on 5th, bro.

Hamilton: What you tryin' to do? I don't know if I have enough on me. I'm bout to--

Roberts: Huh?

Hamilton: What you tryin to do?

Roberts: Oh, some gym type shit?

Hamilton: Nah, nah, I'm saying, what you tryin to do?

Roberts: Ten piece.

Hamilton: Aight, look, I only got, eight, I'm bout to call this ni**** right now. Give me a second.

Roberts: Aight.

Based on the content of this conversation and other intercepted communications, Roberts ordered 10 clips of crack-cocaine from Hamilton.

106. On or about July 27, 2014, at approximately 2:25 p.m., Clark, who was using Cell Phone-1, received a call from Roberts, who was using the Roberts 4724 Phone. During that conversation, Hamilton and Roberts had the following discussion:

Roberts: Where you at?

Clark: I got, I got that, that-- that other shit, that old shit right now.

Roberts: Oh aight, that shit, I don't want to fuck with?

Clark: Yeah, you don't want that shit.

Roberts: Thanks for being honest with me, Tah. Aight bro.

Clark: How many you needed?

Roberts: I only wanted two anyway, cause I had just bought something yesterday.

Clark: Oh aight. I'm waiting-- I'm waiting for some new shit to come through.

Roberts: Aight, just swing through.

Based on the content of this conversation and other intercepted communications, Roberts called Clark to place an order for crack-cocaine, but Clark informed Roberts that the quality of the crack-cocaine that Clark was selling at that time was poor. After Roberts informed Clark that he (Roberts) wanted to purchase 2 clips of crack-cocaine, Clark told Roberts that he (Clark) was waiting to obtain a new batch of crack-cocaine.

Tamir White

107. On or about June 20, 2014, at approximately 3:13 p.m., White, using a cell phone with a telephone number ending in 5814 (hereinafter, the "White 5814 Phone"), spoke with

Concepcion, who was using Cell Phone-1. During that conversation, White and Concepcion had the following exchange:

White: Hey Wax.

Concepcion: Wassup bro?

White: Yo, how, eh yo, how long it's going to take you to get to the Ave? I need you. I got a sale.

Concepcion: I'm about to come now.

White: Come right now, yo, I, I need you, my sale right here.

Shortly thereafter, at approximately 3:26 p.m., White called Concepcion again:

White: Where you at?

Concepcion: I'm on my way to you right now.

White: How long?

Concepcion: Coming to you right now.

White: Come on, Wax.

Based on the content of this conversation, and other intercepted communications, White had a customer who wanted to purchase a quantity of crack-cocaine from White. As a result, White called Concepcion in order to purchase a supply of crack-cocaine.

108. On or about June 21, 2014, at approximately 2:56 p.m., White used the White 5814 Phone to speak with Hamilton, who was using Cell Phone-1. Hamilton and White told Hamilton, "I'm in my house," then told Hamilton, "Bring two" (asking for 2 clips of crack-cocaine).

109. On or about June 23, 2014, at approximately 12:20 p.m., law enforcement officers observed an individual (hereinafter, "Individual-3") approach White and White's coconspirator (hereinafter, "Coconspirator-5") in the vicinity of 3rd Street and Central Avenue in Newark, New Jersey. Officers observed Coconspirator-5 hand something to Individual-3, while Individual-3 handed White what appeared to be U.S. currency. Shortly thereafter, officers stopped Individual-3 who admitted to officers that he was in possession of 2 zip-lock baggies containing crack-cocaine. Both White and Coconspirator-5 were arrested by detectives with BON.

110. On or about July 3, 2014, at approximately 10:58 a.m., White, using the White 5814 Phone, spoke with Concepcion, who was using Cell Phone-1. During that conversation, White and Concepcion had the following exchange:

Concepcion: Who this?

White: Trauma.

Concepcion: See how you do me, baby boy?

White: N****, I just came home.

Concepcion: What you was locked up for?

White: Krillz.

Concepcion: Aight, give me 15 minutes, yo.

White: Aight.

Based on the content of this conversation and other intercepted communications, White called Concepcion in order to purchase a quantity of crack-cocaine. White told Concepcion that he (White) had been arrested for possessing or distributing crack-cocaine ("krillz").

111. Shortly thereafter, at approximately 1:09 p.m., White, using the White 5814 Phone, spoke with Concepcion, who was using Cell Phone-1. The two had the following conversation:

White: You gon take care of me, big brah?

Concepcion: What you need?

White: I'm saying, I got bagged, my n****. I'ma, I'ma, I owe you sixty dollars, I'ma give you that. I was gonna see if I get one, you throw one. I'ma just give you that sixty today. Out of that.

Concepcion: I don't know if I could get you, I gotta pay rent.

White: I'm saying, I'ma give you sixty right now. I'll just owe you forty. You heard me?

Concepcion: Yeah, I'ma see.

White: Aight.

Based on the content of this conversation and other intercepted communications, White told Concepcion that he (White) had just been arrested by law enforcement ("I just got bagged") and needed help. White asked Concepcion whether Concepcion would sell an additional clip of crack-cocaine on consignment, if White purchased 1 clip and gave Concepcion \$60.

Monesha Johnson

112. On or about June 13, 2015, at approximately 5:31 p.m., M. Johnson, used a cell phone with a telephone number ending in 4779 (hereinafter, the "Johnson 4779 Phone"), spoke with Clark, who was using Cell Phone-1. During that conversation, M. Johnson and Clark had the following exchange:

Clark: Yo.

M. Johnson: Hello? Hey, you, um, you around?

Clark: Where you at?

M. Johnson: Right here coming from Park Ave, by the bebop corner store.

Clark: Aight.

M. Johnson: We need 2.

Based on the content of this conversation and other intercepted communications, M. Johnson called Clark in order to purchase crack-cocaine. M. Johnson told Clark and her and her associates needed two clips of crack-cocaine. Shortly thereafter, at approximately 5:49 p.m., M. Johnson and Clark spoke again and Clark said, "I'm outside Mo" (referring to Johnson by a shortened version of her first-name, Monesha). M. Johnson replied, "Alright, I'm coming out."

113. On or about June 18, 2014, at approximately 8:21 p.m., M. Johnson, used the Johnson 4779 Phone, to speak with Coelho, who was using Cell Phone-1, as follows:

M. Johnson: I'm in my house now gettin. Where you at?

Coelho: Aight, I'm back, come back over here?

M. Johnson: Yeah, where you at? Around the corner? Aight, aight, I'm comin' right back.

Coelho: Alight, I'm right here where you see me before.

M. Johnson: Alright, I'm coming now.

Based on the content of this conversation and other intercepted communications, M. Johnson called Coelho to purchase a quantity of crack-cocaine. Coelho instructed M. Johnson to meet him at the same location that M. Johnson and Coelho had met previously.

114. On or about July 10, 2014, at approximately 3:26 p.m., M. Johnson, used the Johnson 4779 Phone, to speak with Concepcion, who was using Cell Phone 1. M. Johnson and Concepcion had the following conversation:

M. Johnson: Hello? Hello?

Concepcion: Hello, you still need me, Mo?

M. Johnson: Yeah. I'ma meet you right there on, on before you turn in coz all them motherfucking housing people out and shit.

Concepcion: Say it again?

M. Johnson: I'ma meet you on the corner, you know, where you about to turn in.

Concepcion: Seventh Ave?

M. Johnson: Yeah. I'm coming right now.

Concepcion: Aight, what's the number?

M. Johnson: I want, gimme, um, um, 2.

Concepcion: Aight.

M. Johnson: Aight.

Based on the content of this conversation and other intercepted communications, M. Johnson called Concepcion to order crack-cocaine. Concepcion and M. Johnson discussed meeting on corner of Seventh Avenue. When Concepcion asked M. Johnson how many clips of crack-cocaine M. Johnson wanted to purchase, M. Johnson replied that she wanted two clips of crack-cocaine.

115. On or about July 30, 2014, at approximately 7:38 p.m., M. Johnson, using the Johnson 4779 Phone, spoke with Coelho, who was using Cell Phone 1. During that conversation, M. Johnson and Coelho had the following exchange:

M. Johnson: You around?

Coelho: Yeah.

M. Johnson: Where you want me to come to? I'm by the, um, park. Where, where you, you want me stay right here?

Coelho: You're by the park? Stay right there.

M. Johnson: Stay right here?

Coelho: Yeah, I'm 'bout to pull around the corner.

M. Johnson: Aight.

Based on the content of this conversation and other intercepted communications, M. Johnson called Coelho to order a quantity of crack-cocaine. Coelho agreed to meet with M. Johnson at the park near the 6th Avenue Location in order to consummate the drug sale.