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

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UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	The Honorable Steven C. Mannion
DENNIS WRIGHT,	:	
a/k/a "Hersh,"	:	
a/k/a "Coyote,"	:	Mag. No. 15-6090
MILTON LATHAM,	:	
a/k/a "Murder,"	:	
GABRIEL HENDERSON,	:	<b><u>FILED UNDER SEAL</u></b>
a/k/a "Gabe,"	:	
VINCENT J. CARTER,	:	
a/k/a "Vince,"	:	
a/k/a "Vin,"	:	
AHMAD MANN,	:	
a/k/a "P.O."	:	
a/k/a "P-Easy,"	:	
SHAROD BROWN,	:	
a/k/a "Hot Rod,"	:	
a/k/a "Sharod Caraway," and	:	
LARRY COLEMAN,	:	
a/k/a "LA"	:	

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

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Rachel Kolvek  
Special Agent  
Federal Bureau of Investigation

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, and Possess with Intent to Distribute, Heroin)**

Between in or about December 2014 and on or about May 20, 2015, in Essex County, in the District of New Jersey and elsewhere, defendants

DENNIS WRIGHT,  
a/k/a "Hersh,"  
a/k/a "Coyote,"  
MILTON LATHAM,  
a/k/a "Murder,"  
GABRIEL HENDERSON,  
a/k/a "Gabe,"  
VINCENT J. CARTER,  
a/k/a "Vince,"  
a/k/a "Vin,"  
AHMAD MANN,  
a/k/a "P.O."  
a/k/a "P-Easy,"  
SHAROD BROWN,  
a/k/a "Hot Rod,"  
a/k/a "Sharod Caraway," and  
LARRY COLEMAN,  
a/k/a "LA,"

did knowingly and intentionally conspire with each other and others to distribute, and possess with intent to distribute, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

## **ATTACHMENT B**

I, Rachel Kolvek, have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since March 2001 years, and 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 defendant; and (c) my review of audio recordings and photographs. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. 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 officers.

### **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 coconspirator Ahmed Singleton, a/k/a “Gangsta-Mu,” a/k/a “Mooshie” (hereinafter, “Singleton”)—a member of the NJ Grape Street Crips charged in a separate federal criminal complaint<sup>1</sup>—who had been charged by the Essex County Prosecutor’s Office with, among other charges, aggravated assault with a weapon in connection with a shooting. Immediately after the dismissal of those charges by the Essex County Prosecutor’s Office, Singleton bragged to coconspirator Louis Coston a/k/a “Real Rell,” another member of the Enterprise, that he had “beat trial.” Singleton explained: “You know, *I had the goons in the back seat so, so he [the victim-witness] 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?” Singleton also said that the attorney for the victim-witness told Singleton and Singleton’s attorney that the victim-witness would “do the right thing” (meaning refuse to testify against Singleton) so that Singleton would not “take that ni\*\*a shit off when he come home for telling.” Singleton explained that, when the victim-witness took the witness stand, “he was like, ‘Yo, I don’t got nothing to say.’” Singleton went on: “I walked out of court free, ni\*\*a, who you know do that . . . *who you know cause ruckus on these motherfuckin streets, come home, do whatever the fuck they want, and still be out here son?*” As a result of these efforts by Singleton and other members and associates of the NJ Grape Street Crips to intimidate the victim/witness, all charges against Singleton in connection with the shooting had to be dismissed.

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<sup>1</sup> Singleton and Louis Coston a/k/a “Real Rell,” are 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.

b. 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.

c. 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 harm an individual who was believed to have cooperated with the law enforcement investigation.

d. On or about August 28, 2014, *after* the shooting for which Singleton was charged by the Essex County Prosecutor's Office, 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, coconspirator Justin Carnegie, a/k/a "Dew Hi," a/k/a "Aaron Dickerson"—a member of the NJ Grape Street Crips charged in a separate federal criminal complaint<sup>2</sup>—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 nigga 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.

e. A post on a social media account used by Justin Carnegie, a/k/a "Dew Hi," a/k/a "Aaron Dickerson," 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 NJ 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

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<sup>2</sup> Carnegie is 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.

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. Concepcion 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 and associates 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 and associates 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.

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”).

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

10. At all times relevant to this Criminal Complaint:

a. Defendant Dennis Wright, a/k/a “Hersh,” a/k/a “Coyote” (hereinafter, “Wright”), is a member of the NJ Grape Street Crips, who supplied brick quantities of heroin to defendant Ahmad Mann, a/k/a “P.O.,” a/k/a “P-Easy,” and others.<sup>3</sup> Wright operated at the Hyatt Court Location. On or about November 4, 2002, Wright was convicted in federal court of conspiracy to distribute and possess with intent to distribute heroin, in violation of 21 U.S.C. § 846. On or about November 19, 2002, Wright was convicted of, among other offenses, aggravated manslaughter, in violation of N.J.S.A. 2C:11-4, causing serious injury while eluding,

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<sup>3</sup> A “brick” is a street term that refers to a package of heroin containing five “bundles” of heroin, which, in turn, is a package containing 10 individual “hits,” or doses, of heroin. These individual doses are packaged in glassine envelopes that are referred to as “decks” or “bags” of heroin. Thus, a “brick” contains 50 “decks,” or doses, of heroin. In addition, drug traffickers frequently use “stamps” or “labels” on the glassine envelopes that contain individual “hits” of heroin in order to allow drug users to differentiate batches of heroin.

in violation of N.J.S.A. 2C:12-1, possession of an assault firearm, in violation of N.J.S.A. 2C:39-5. On or about March 23, 2015, Wright was convicted of distribution of a controlled dangerous substance on school property, in violation of N.J.S.A. 2C:35-7. As a result of these convictions, Wright is a career offender under the United States Sentencing Guidelines.

b. Defendant Milton Latham, a/k/a “Murder” (hereinafter, “Latham”), is an associate of the NJ Grape Street Crips, who supplied brick quantities of heroin to Mann and others. Latham operated from the Riverview Court Location and the Hyatt Court Location.

c. Defendant Ahmad Mann, a/k/a “P.O.,” a/k/a “P-Easy” (hereinafter, “Mann”), is an associate of the NJ Grape Street Crips, who distributed brick quantities of heroin in or around the Pennington Court Location and the Hyatt Court Location. On or about February 2, 2005, Mann was convicted in federal court of distribution of heroin, in violation of 21 U.S.C. § 846. On or about November 9, 2009, Mann was convicted of criminal possession of a controlled substance with intent to sell, in violation of N.Y. Penal Code 220.16(1). As a result of these convictions, Mann is a career offender under the United States Sentencing Guidelines.

d. Defendant Gabriel Henderson, a/k/a “Gabe” (hereinafter, “Henderson”), is an associate of Mann who supplied brick quantities of heroin to Mann and others. On or about April 30, 2002, Henderson was convicted of manslaughter, in violation of N.J.S.A. 2C:11-4, aggravated assault in the second degree, in violation of N.J.S.A. 2C:12-1, and possession of a firearm for an unlawful purpose, in violation of N.J.S.A. 2C:39-4. On or about May 21, 2002, and on or about May 21, 2002, Henderson was convicted of, among other offenses, separate charges of distribution of a controlled dangerous substance on school property, in violation of N.J.S.A. 2C:35-7. As a result of these convictions, Henderson is a career offender under the United States Sentencing Guidelines.

e. Defendant Vincent J. Carter, a/k/a “Vin” (hereinafter, “Carter”), is an associate of Mann who supplied brick quantities of heroin to Mann and others.

f. Defendant Sharod Brown, a/k/a “Hot Rod,” a/k/a “Sharod Caraway” (hereinafter, “Brown”), is a member of the NJ Grape Street Crips who distributed heroin at the Pennington Court Location. Brown has used a social media account to post a photograph that stated “K.A.R.,” and, below that, “KILL ALL RATS.” On or about December 5, 2005, and on or about July 18, 2007, Brown was convicted of two separate charges of distribution of a controlled dangerous substance on school property, each in violation of N.J.S.A. 2C:35-7. As a result of these convictions, Brown is a career offender under the United States Sentencing Guidelines.

g. Defendant Larry Coleman, a/k/a “LA” (hereinafter, “Coleman”), is a member of the NJ Grape Street Crips who distributed heroin at the Pennington Court Location. On or about April 16, 2014, Coleman was convicted of two separate charges of distribution of a controlled substance, each in violation of N.J.S.A. 2C:35-5. As a result of these convictions, Coleman is a career offender under the United States Sentencing Guidelines.



## **THE INVESTIGATION**

11. 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 used by members and associates of the NJ Grape Street Crips. Calls and text messages intercepted over these cell phones revealed the scope of the Enterprise's drug trafficking at various locations, including the identities of narcotics suppliers, wholesale narcotics customers, distributors, and other coconspirators. In addition, law enforcement officers conducted numerous controlled purchases of narcotics from members and/or associates of the Enterprise. Some of these communications and other evidence are described below.

### **November 2014 Controlled Purchase**

12. In or around November 2014, law enforcement officers outfitted an individual (hereinafter, "Individual-1") with an audio-video recording device, provided Individual-1 with United States currency with which to purchase heroin, and ensured that Individual-1 did not have any unauthorized contraband or currency.

13. Individual-1 then entered the Pennington Court Location and met with, among other individuals, Coleman and Brown. Individual-1 told Coleman that Individual-1 needed to purchase ten bricks of heroin. After speaking to Individual-1, Coleman then spoke with Brown. As captured on the audio-video recorder Brown confirmed with Individual-1 that Individual-1 wanted to purchase ten bricks of heroin and asked Individual-1 how much money Individual-1 had with him/her. Brown then told Individual-1 that he (Brown) would make a phone call.

14. At that time, Brown, Coleman, and Individual-1 entered one of the residential building units at the Pennington Court Location. As captured on the audio-video recorder, while inside the residential building units, Coleman sold approximately two decks of heroin to another individual.

15. Thereafter, Brown and Individual-1 travelled to a different location where another individual (hereinafter, "Individual-2") provided Brown with the ten bricks of heroin. Brown then provided to Individual-1 ten bricks of a substance that field-tested positive for the presence of heroin.

### **December 2014 Controlled Purchase**

16. In or about December 2014, law enforcement officers outfitted Individual-1 with an audio-video recording device, provided Individual-1 with United States currency with which to purchase heroin, and ensured that Individual-1 did not have any unauthorized contraband or currency.

17. Individual-1 then entered the Pennington Court Location and met with, among other individuals, Coleman. Individual-1 told Coleman that Individual-1 was looking to purchase heroin for \$135 per brick. Coleman took Individual-1 into one of the residential building units at the Pennington Court Location. Inside, Coleman yelled "P-Easy."

18. Shortly thereafter, Mann arrived, and Individual-1 and Mann agreed that Individual-1 would purchase from Mann ten bricks of heroin at a price of \$135 per brick. Mann told Individual-1 that he (Mann) would be back in approximately 10 minutes.

19. When Mann returned to the Pennington Court Location, as captured on the audio-video recorder, Mann provided Individual-1 with ten bricks of heroin in exchange for a sum of United States currency. Mann then provided Individual with a telephone number ending in 3772 (hereinafter, the "Mann 3772 Phone"). Mann instructed Individual-1 to call the Mann 3772 Phone should Individual-1 wish to purchase heroin from Mann in the future. Mann instructed Individual-1 to say something to the effect of "I need to borrow ten dollars" and then the Mann would meet Individual-1 to consummate the ten brick heroin transaction.

#### **January 2015 Controlled Purchase**

20. In or about January 2015, law enforcement officers outfitted Individual-1 with an audio-video recording device, provided Individual-1 with United States currency with which to purchase heroin, and ensured that Individual-1 did not have any unauthorized contraband or currency.

21. After speaking with Mann over the phone, Individual-1 met with Mann. Mann told Individual-1, "You gotta give me, um, 145 [U/I]<sup>4</sup> because I got this from somebody else, because I don't want [U/I] get, um, all jammed up with these ni\*\*as" (Mann told Individual-1 that the price would be \$145 per brick of heroin). Mann then sold four bricks of heroin to Individual-1 in exchange for a sum of United States currency.

#### **March 14 Transaction**

22. On or about March 14, 2015, Mann, using a cell phone with a telephone number ending in 3772 (hereinafter, the "Mann 3772 Phone"), received a telephone call from a coconspirator (hereinafter, "Coconspirator-1"). Mann and Coconspirator-1 had the following conversation:

CC1:	Hello?
Mann:	You still need that?
CC1:	Yeah, I'll be down there in like 20-30 minutes.
Mann:	Whatcha trying to do? Same thing?
CC1:	Yeah, same thing.

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<sup>4</sup> "[U/I]" means that the portion of the recording so designated cannot be heard on readily-available equipment.

Mann:            Alright so I'll meet, alright, so 20 minutes you'll be down there.

CC1:            Alright.

Mann:            Alright, I'll meet you down there. I'm down there already.

CC1:            Alright.

Based on the content of this conversation, on other intercepted communications, and my training and experience, Coconspirator-1 was asking Mann whether Mann could supply Coconspirator-1 with the same quantity of heroin that Coconspirator-1 had previously purchased from Mann.

23.        Immediately thereafter, at approximately 4:34 p.m., Mann used the Mann 3772 Phone, to place a call to Wright, who was using a cell phone with a telephone number ending in 9456 (hereinafter, the "Wright 9456 Phone"). During that conversation, Mann and Wright had the following discussion:

Wright:        Yo.

Mann:        I need two dollars real quick.

Wright:        [U/I]

Mann:        Two, yeah-- where ya at?

Wright:        We need, we need two?

Mann:        Yeah, this is for somebody different.

Wright:        Alright.

Mann:        [U/I]

Wright:        Alright, well I'm on my way down there now.

Mann:        How long you gonna be?

Wright:        Like 15 minutes-- like not even that long. You down there already?

Mann:        Yeah, I'm down there, I'm down in the projects.

Wright:        Alright, I'm about to call John. I'ma call John.

Mann:        Alright, I'm on my way down there now. Gonna give him the money?

Based on the content of this conversation, on other intercepted communications, and on my training and experience, Mann called Wright, after receiving the call from Coconspirator-1, in

order to obtain from Wright two bricks of heroin. Mann told Wright that he (Mann) was already at either the Pennington Court Location or the Hyatt Court Location ("the projects").

### **March 18-21 Transactions**

24. On or about March 18, 2015, at approximately 12:18 p.m., Mann, using the Mann 3772 Phone, placed a telephone call to Wright, who was using the Wright 9456 Phone. During that conversation, Mann and Wright had the following exchange:

Wright: Yo.

Mann: My bad, hey yo down your way?

Wright: No, um, I'm on the north side.

Mann: Uh, you got, you got um five dollars on you?

Wright: Huh?

Mann: You got five dollars with you?

Wright: Um, nah.

Mann: You know where I can get it?

Wright: I would have to call for it.

Mann: Alright.

Wright: I can get it, I could get it.

Mann: Call for it, I'm in um, if you want I can drop the change off wherever you going to call cuz I'm ready and I'm going to be back tonight.

Wright: Alright, with the other one?

Mann: Yeah with the money, with the, for the five dollars I'm gonna take, I got the money for the other dirt.

Wright: Alright, I'm about to um, go get it now.

Mann: So what you want me to do?

Wright: I'm a, I'm a meet you in the same place.

Mann: Uh, how long you gonna be?

Wright: About twenty minutes.

Mann: Alright, I'll be waiting on you.

Based on the content of this conversation and other intercepted communications, Mann called Wright in order to obtain five bricks of heroin from Wright. Wright told Mann that he (Wright) did not have the five bricks but that he could obtain it. Wright and Mann then made plans to meet.

25. Shortly thereafter, at approximately 12:31 p.m., Mann, using the Mann 3772 Phone, placed a call to Wright, who was using the Wright 9456 Phone. Mann and Wright had the following conversation:

Wright: Yo.

Mann: What's good my boy?

Wright: Hey ya'll I was calling to say that yo meet me at the Hyatt, and I only got--

Mann: Alright.

Wright: And I only got three left. Want them?

Mann: I'm gonna have to take them.

Wright: Huh?

Mann: Gonna have to get them.

Wright: Alright, well, um, could run it to me down the projects?

Mann: Yeah, how long you gonna be?

Wright: I'm, I'm on my way there now. I'm on the, I'm on the Turnpike.

Mann: Alright, so I'm right here by Penn Station.

Wright: Oh, yeah alright, we'll get there around the same time.

26. Based on the content of this conversation, Wright told Mann that he (Wright) only had three bricks of heroin and Mann told Wright that he (Mann) would take them. Mann and Wright then made plans to meet at the Hyatt Court Location.

27. On or about March 20, 2015, at approximately 5:45 p.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using a cell phone with a telephone number ending in 8024 (hereinafter, the "Henderson 8024 Phone"). During that conversation, Henderson told Mann, "I just left from [U/I] Pennington, wasn't nobody down there." Mann replied, "They probably in the hallways and shit. You know how them ni\*\*ers do," (referring to members and associates of the Grape Street Crips who distribute narcotics from inside the hallways at the Pennington Court Location.

28. On or about March 21, 2015, at approximately 5:51 p.m., Mann, using the Mann 3772 Phone, received a text message from Wright, who was using the Wright 9456 Phone. The text message stated: "Wut up wit my bread yo." Based on prior intercepted communications and on my training and experience, Wright asked Mann when Mann was going to pay Wright as a result of a narcotics transaction.

### **March 23 Transactions**

29. On or about March 23, 2015, at approximately 11:12 a.m., Mann, who was using the Mann 3772 Phone, spoke with a coconspirator (hereinafter, "Coconspirator-3"). During that conversation, CC3 and Mann had the following discussion:

CC3: I need something man, got a couple dollars for you man.

Mann: What was you trying to do?

CC3: Nah, nah, nah, I'm trying to do like, uh, uh, more like uh, like six of them shits son.

Mann: Aight.

Shortly thereafter, at approximately 11:14 a.m., Mann and Coconspirator-3 spoke once again:

Mann: How you wanted it?

CC3: Huh?

Mann: What time you gonna, what time you want me to meet up?

CC3: I don't know. I got the, I got the bread, I got the bread with me, I don't got to go to the ATM [U/I].

Mann: Alright.

CC3: Alright, just him me yo.

Based on the content of this conversation, facts developed during the course of the investigation, and previously intercepted communications, Coconspirator-3 told Mann that he (Coconspirator-

3) wanted to purchase six bricks of heroin from Mann. Coconspirator-3 then told Mann that he (Coconspirator-3) had the money ("the bread") to purchase the six bricks of heroin.

30. Shortly thereafter, at approximately 11:43 a.m., Mann, using the Mann 3772 Phone, spoke with a coconspirator (hereinafter, "Coconspirator-4"). Mann and Coconspirator-4 had the following exchange:

Mann: You wanna give me six out of there if you go six?

CC4: I got the whole fucking slab going as a whole slab my nigga.

Mann: You can't, you can't give out six out of it?

CC4: Cuz then what am I gonna do with the other ten?

Mann: Wait for him to call and get it again when he calls, you know?

CC4: I'll hit, I'll hit you back Fish, let me see what I can, what I can work on.

Mann: Cuz he wants six, you know?

CC4: Yeah.

Mann: Them niggas call.

CC4: I'm gonna hit, I'm running now, so I'm gonna hit you in maybe like an hour or so.

Mann: Alright, so after school cuz, I be coming, he at work.

CC4: Alright.

Based on the content of this conversation and previously intercepted communications, Mann called Coconspirator-4 in order to obtain six bricks of heroin that Mann could then sell to Coconspirator-3. Coconspirator-4 did not immediately agree to provide Mann with the six bricks because he (Coconspirator-4) was selling the sixteen bricks that he had as a whole package.

31. On or about March 23, 2015, at approximately 1:19 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-3. Mann and Coconspirator-3 had the following exchange:

CC3: Yo.

Mann: Yeah, my boy, I'm bringing, you don't get off till five, right?

CC3: Huh?

Mann: You don't get off until five o'clock, right?

CC3: Yeah.

Mann: I'll be down there at the school to bring it to you. You got everything together?

CC3: What time?

Mann: At the school, like at the school, I'll bring it to you.

CC3: Alright, look, alright, no, I'm gonna need a couple more though, I'm gonna hit you when I get home though.

Mann: It ain't, I don't think there's that many left around, I think, I don't know. I gotta wait to see.

CC3: Alright bro.

Based on the content of this conversation and previously intercepted communications, Mann told Coconspirator-3 that he (Mann) would deliver the six bricks of heroin to Coconspirator-3 by the school. Coconspirator-3 told Mann that he (Coconspirator-3) wanted two additional bricks of heroin, and Mann indicated that he (Mann) had to wait to see if he could obtain two additional bricks.

32. Mann's very next phone call, shortly thereafter, at approximately 1:26 p.m., was to Brown, who was using a cell phone with a telephone number ending in 8488 (hereinafter, the "Brown 8488 Phone"). During that conversation, Mann informed Brown: "What's up. I'm about to get with these ni\*\*as now, [U/I], they just called me, so I'm, I'll be at the school." Brown responded, "Alright." Based on the content of this conversation and other intercepted communications, Mann reported to Brown that he (Mann) was about to consummate a heroin transaction at the school near the Pennington Court Location.

33. At approximately 2:13 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-4. Mann and Coconspirator-4 had the following exchange:

Mann: You ain't gonna be able to do it?

CC4: The whole thing.

Mann: Oh aight well he [U/I] ain't got money for the whole one.

CC4: Aight, well, if um-- if I come across a couple, I'll holla at you an let you know.



Mann: Aight.

Based on the content of this conversation and previously intercepted communications, Mann asked Coconspirator-4 if Coconspirator-4 could sell him the bricks of heroin, but Coconspirator-4 indicated that he would only sell the entire package of heroin. Mann indicated that his customer did not have money for the entire package.

34. Several hours later, at approximately 3:12 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-5, who was using a cell phone with a telephone number ending in 6303. During that conversation, Mann and Coconspirator-5 had the following exchange:

Mann: That's why I called, I called you first to see, but, then I got in touch with Top, he was like, he was out, then he was like, nah, he ain't doing it.

CC5: He already told me. He said he didn't want to split it up cuz ain't nobody want to take all that shit fucked up like that.

Mann: I told him that nigga come back, you know, a couple days, you know?

CC5: Yeah, but [U/I], you know what I'm saying.

Mann: Mmhmmm.

CC5: You know, don't like it you know what I mean, shit be [U/I] just cheap.

Mann: Mmhmmm.

Based on the content of this conversation and other intercepted communications, Mann told Coconspirator-5 that he (Mann) had asked Coconspirator-4 to sell Mann a quantity of heroin so that Mann could re-sell that quantity to a customer. Coconspirator-5 told Mann that Coconspirator-4 had already told Coconspirator-5 that Mann had asked him (Coconspirator-4) for heroin but that Coconspirator-4 had told Coconspirator-5 that he (Coconspirator-4) did not want to break up the heroin package.

35. At approximately 4:53 p.m., Mann, using the Mann 3772 Phone, spoke with Brown, who was using the Brown 8488 Phone. During that conversation, Mann and Brown had the following discussion:

Mann: Hey yo.

Brown: Yo.

Mann: I'm right here with, um, with your boy, [Coconspirator-6]. You heard me?

Brown: Huh?

Mann: Nothin, he about to give me a rack, I'm a, he gonna give me a rack. And I'm gonna sell like ten or eleven. Probably half, more than half or better down there till later on.

Brown: Say that again.

Mann: I say he gonna give me like a rack, I told him I gotta take care that, and like maybe between eight to ten down there.

Brown: Alright, but that shit ain't got nothing to do with me. I ain't got nothing to do with nobody else bro.

Mann: Alright then.

Brown: Well I ain't never been doin business with nobody else man. I dunno. Alright.

Mann: Nah, he said, he, nah he gonna bring it to you though. That's what he told me.

Brown: Alright

Mann: That's what I'm trying to tell you man.

Brown: Alright.

Mann: That's what he gonna take me, what he gotta take, I guess, however it all work, however you all do it, I don't know what you all been into.

Brown: Yeah, alright.

Mann: He said it was good, don't worry about. It's good to me, so you don't come back him, like [U/I].

Brown: I'm, um.

Mann: He know what I gotta do. You know what I gotta right now.

Brown: Yeah, yeah. I already know this shit.

Mann: Tell him, he [U/I]. Alright.

Based on the content of this conversation and other intercepted communications, Mann told Brown that he (Mann) was with Coconspirator-6 who was going to provide Mann with a rack of heroin. Mann then planned to sell that heroin. When Brown responded that he (Brown) was not doing business with Coconspirator-6, Mann told Brown that Coconspirator-6 would bring the drug proceeds back to Brown and that Brown and Coconspirator-6 could split the proceeds "however you all do it." Brown agreed to that arrangement.

36. At approximately 4:55 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-3. Mann asked Coconspirator-3, "You still want that right?" (referring to the bricks of heroin that Coconspirator-3 previously ordered from Mann). Coconspirator-3 replied, "Yeah, yeah."

37. At approximately 5:41 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-3. Mann told Coconspirator-3: "I'm on my way to you bro. I'm about to grab it now at the house. I'll get it." Coconspirator-3 replied, "Aight." Based on the context of this conversation and other intercepted communications, Mann told Coconspirator-3 that he (Mann) would be delivering the heroin shortly.

#### **March 24 Transaction**

38. On or about March 24, 2015, at approximately 11:52 a.m., Mann, using the Mann 3772 Phone, spoke with Individual-1, who had ordered ten bricks of heroin the previous day, on or about March 23, 2015. Individual-1 told Mann that it was "a definite go for today though."

39. At approximately 12:24 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Wright: Yo, what's up son?

Mann: What's good my boy?

Wright: Salaam alaikum. What up?

Mann: I'm alright, you

Wright: I'm good man, eh man, shit, shit got real for a nigger yo.

Mann: What happened?

Wright: I went to court yesterday son, it wasn't, it wasn't, they was tryin to pass my shit to the feds, let the feds take my case.

Mann: What, a ratchet?

Wright: Nah, some drugs, son, seven bundles and seven clips, yo.

Mann: They ain't, they ain't get it though, right.

Wright: Huh?

Mann: Feds don't want that shit.

Wright: Man, he said the feds contacted him and told him to pass the, the, that they'd take my case.

Mann: You talk to your lawyer.

Wright: Yeah, my lawyer, my lawyer was like, he told em no that he's not, he's not, he's not lettin em pass my shit over, I copped out, so, so they can't charge me for the shit.

Mann: What'd you cop out to?

Wright: A four flat.

Mann: What's that, like 27 months [U/I].

Wright: Nah, nah I'll be eligible for parole in 9 months.

Mann: Yeah.

Based on the content of this conversation, reports obtained from the Newark Police Department, and information obtained from the Essex County Prosecutor's Office, Wright told Mann that he (Wright) had a state court appearance the previous day—March 23—related to a “drug” charge which resulted from Wright being arrested with “seven bundles” and “seven clips.” In fact, on March 23, 2015, Wright pleaded guilty to one count of distribution of a controlled substance, in violation of N.J.S.A. 2C:35-7, and one count of resisting arrest, in violation of N.J.S.A. 2C:29-2, for an offense committed on or about March 6, 2014. According to police reports from the Newark Police Department, Wright was arrested on or about March 6, 2014, at the Hyatt Court Location in possession of 69 baggies of cocaine or crack-cocaine and 64 glassine envelopes of heroin, which are the “seven clips” and “seven bundles” to which Wright referred in the call with Mann.

40. The conversation between Mann and Wright continued as follows:

Wright: Yeah, I'll be in and out, but what's good though.

Mann: Umm, I should be out, maybe tonight. I'm waiting for this nigger now to hit me-- buy 12.

Wright: Alright, well, just call me when um, just call me, cause, I, I, I, don't know, so just call me and I'm gonna let you know what I got.

Mann: Come out when you get close, I mean, I'm trying to figure it out

Wright: Alright, cool.

Mann: But you don't got it though?

Wright: No, I'm I'm gonna see. I don't know, yo I don't know, yo, I ain't do shit yesterday, I ain't talked to nobody. I was just chillin.

Mann: Right.

Wright: I was all the way fucked up. So I was just chillin.

Mann: How long you gonna be before you hit me back?

Wright: Um, give me, I'm waiting for Murder to come get me, he, he, he, handlin something with his grandmother so after he come get me and we go down to the projects, I'm gonna call you, so give me about an hour or two.

Mann: Alright.

Based on the content of this conversation and other intercepted communications, Mann told Wright that he (Mann) had a customer who wanted to purchase twelve bricks of heroin. Wright then told Mann that he (Wright) would check his supply of heroin and let Mann know if he (Wright) could supply it to Mann ("so just call me and I'm gonna let you know what I got."). Wright told Mann that he (Wright) would be meeting with Latham ("Murder") shortly and both Wright and Latham would be going "down to the projects," likely referring to either the Hyatt Court Location or the Riverview Court Location.

41. At approximately 2:52 p.m., Mann, using the Mann 3772 Phone, spoke with Individual-1 as follows:

Mann: Alright, you want the twelve, right?

Individual-1: Huh?

Mann: Twelve, right?

Individual-1: No, ten, ten.

Mann: Ten?

Individual-1: Yeah.

Mann: Alright.

Based on the content of this conversation and other intercepted communications, Mann asked Individual-1 if Individual-1 was ready to purchase the twelve bricks of heroin. Individual-1 told Mann that Individual-1 wanted to purchase ten, not twelve, bricks of heroin.

42. Immediately thereafter, at approximately 2:54 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Wright: Hello?

Mann: Hey, what up, you in heaven my boy?

Wright: Hey yo, I'm on my way down the projects now, so when I get down there I'm gonna call you.

Mann: You want me to come down there?

Wright: I'll see what--

Mann: Or you ain't got it.

Wright: Alright.

Mann: You heard me?

Wright: Nah, I'm about to go down there and see what I got down there.

Mann: You don't got ten?

Wright: I'm gonna see. When I get--

Mann: Hit me right back let me know [U/I].

Wright: Alright.

Based on the content of this conversation and other intercepted communications, Mann asked Wright if Wright had ten bricks of heroin. Wright replied that was on his way to "the projects" and that he (Wright) would check his supply of heroin.

43. On or about March 24, 2015, at approximately 3:59 p.m., Mann, using the Mann 3772 Phone, spoke with Carter, who was using the Carter 6416 Phone. During that conversation, Mann and Carter had the following discussion:

Carter: Yeah, I can hear you

Mann: Yeah, um, what's the, what's the price on anyway, on what, what you got? I got somebody that needs some.

Carter: Well, mine 150.

Mann: That's whack, dude.

Carter: I pay 150 for em, I sell them 170.

Mann: He ain't gonna pay that much, he ain't gonna--

Carter: But, listen, this what I'm gonna do, this is what I'm gonna do, we gonna get together, I'm gonna give you something and you gonna take it from there. So where, where's you at right now?

Mann: I'm at the house still.

Carter: I'll be back down by the highway.

Mann: Where you at? You home?

Carter: Yeah.

Mann: Want me to come up that way, I can meet you, alright, I'll be up that way.

Based on the content of this conversation and other intercepted communications, Mann asked Carter about the price of the bricks of heroin that Carter purchased. Carter told Mann that he (Carter) purchased bricks of heroin for \$150 per brick, and he sold them for \$170 per brick, thus making a profit of \$20 per brick of heroin. Mann told Carter that his customer would not pay \$170 per brick. In response, Carter then indicated to Mann that he (Carter) would give Carter a supply of heroin that Mann could sell ("I'm gonna give you something and you gonna take it from there").

#### **March 27 & March 29 Transactions**

44. On or about March 27, 2015, at approximately 6:29 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-6, who was using the Coconspirator-6 8020 Phone. During that conversation, Mann and Coconspirator-6 had the following exchange:

CC6: What's good man?

Mann: Damn, I'm about to grab it stop panicking man I'm not going to play you fo no shit like that man I just been so fucking caught up with all this other dum shit.

CC6: Damn man, I need it I need it I gotta bust a move right now.

Mann: Aight, I'm not even, I'm trying do that now, I'm trying to snatch this, I told you i just got out my house, I came in early this morning, I was up all night, I'm trying, I know Hot Rod need too cause he called me, I got you, I'll be there. I'll hit you up.

CC6: How long you gonna be?

Mann: I don't know I'm on the highway now, I'm battling traffic, don't get me another fucking ticket nigga.

Based on the content of this conversation and other intercepted communications, Coconspirator-6 told Mann that he (Coconspirator-6) needed Mann to pay him back because Coconspirator-6 needed the money to purchase narcotics. Mann also told Coconspirator-6 that he (Mann) needed to pay Brown ("Hot Rod").

45. On or about March 29, 2015, at approximately 8:08 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-6, who was using the Coconspirator-6 8020 Phone. During that conversation, Mann and Coconspirator-6 had the following exchange:

CC6: What's up?

Mann: Nothin, why you, why you stressin, you think I'ma try to play you?

CC6: I'm not, it's not like that, I got shit to do, that not my, that was my money to play with.

Mann: Alright, aright, I got, I understand, but I'm trying--

CC6: You understand what I'm saying?

Mann: Yeah I hear you but listen to this, listen to what I'm about to tell you too. When I bless you, you's gonna be sending extra for you, just be waiting, but I, but I gotta say, I'm [U/I] with something [U/I] right now. Not that son, you know what I'm talking about. And I'm still gettin that, this, give me a minute, I'm with this Puerto Rican nigga, just trying to see something with some people.

CC6: You--

Mann: You'll be taken care of, you'll be compensated okay?

CC6: Uh.

Mann: You'll be compensated. Alright.

Based on the content of this conversation and other intercepted communications, Coconspirator-6 told Mann that he (Coconspirator-6) needed Mann to repay him. Mann then told Coconspirator-6 that Mann would compensate Coconspirator-6 ("gonna be sending extra for you") after Mann consummated one or more drug transactions ("trying to see something with some people").

46. Shortly thereafter, at approximately 8:10 p.m., Mann, using the Mann 3772 Phone, spoke with Brown, who was using the Brown 8488 Phone. During that conversation, Mann and Brown had the following exchange:

Brown: Hello?

Mann: Salaam alaikum.



Brown: Laikum salaam.

Mann: What's up man?

Brown: What's up?

Mann: We should be, we should be alright probably today or the next day, I'm still, I'm still, well I'm texting something, something different. But not what we [U/I] you know what I'm talking about. [U/I] I'm texting that out and I gotta take care of [Coconspirator-6]. I told him he would be compensated for his, for his patience. Not patience, but you know, he be taken care of but um, like another day or two I'ma have that for you, you know what I'm talking about, like two, two of them. I gotta [U/I]. I gotta, I gotta, I gotta take care of my little issues with some shit but um you'll be taken care of probably tomorrow or the next day.

Brown: Alright.

Mann: Probably before that, alright.

Brown: Alright.

Mann: You good, alright.

Brown: Alright, Salaam Laikum

Mann: Laikum salaam-- hey neph, neph-- hello?

Brown: Hello?

Mann: Yeah, if you want I think I got like a zip that shit somewhere though, I mean I don't know--

Brown: I need it.

Mann: Alright.

Brown: Alright. I'm in the house so come see me.

Mann: Alright, I'll try to grab it [U/I] alright.

Based on the content of this conversation and other intercepted communications, Mann informed Brown that he (Mann) would be paying back (with narcotics proceeds) the loan that Brown had given to Mann. Mann also told Brown that he (Mann) would be paying back (with narcotics proceeds) the loan that Coconspirator-6 had extended to Mann. Mann then told Brown that he (Mann) had a quantity of a controlled substance ("zip"), which Brown said that he needed and asked Mann to deliver to his residence.

47. Later that night, at approximately 11:56 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-1. During that conversation, Mann and Coconspirator-1 had the following conversation:

Mann: . . . what's up [Coconspirator-1]?  
CC1: Nothin, what up?  
Mann: [U/I] in the hood?  
CC1: Yeah.  
Mann: [U/I] I got, I got um, I got somethin I want you to see, to see if they um they like it or not. It's supposed to be nobody out here got it, nobody out here nothing seen it, none of that shit.  
CC1: Alright. I'ma see, you don't wanna see me tomorrow?  
Mann: You want, you want me to bring it to you now? While I'm still, while I'm still out here?  
CC1: Nah, see me tomorrow, see me in the morning  
Mann: In the morning?  
CC1: Yeah.

Based on the content of this conversation and other intercepted communications, Mann asked Coconspirator-1 whether Coconspirator-1 was at the Pennington Court Location. Mann then told Coconspirator-1 that he (Mann) had a batch of heroin that he wanted Coconspirator-1 to distribute to heroin addicts to determine whether the addicts liked the heroin. Mann told Coconspirator-1 that no one else had this batch of heroin ("nobody out here got it"). Coconspirator-1 told Mann to see Coconspirator-1 the following morning.

#### **April 2 Transaction**

48. On or about April 2, 2015, at approximately 1:10 p.m., Mann, using the Mann 3772 Phone, spoke with a coconspirator (hereinafter, "Coconspirator-7"). During that conversation, Mann and Coconspirator-7 had the following exchange:

CC7: What's up cuz?  
Mann: What's goin on man?  
CC7: Just got up?  
Mann: Not too long ago, why?

CC7: You ain't never, uh, see what's going on?

Mann: I ain't never um, hit him back yet. I ain't, I ain't, I ain't see nothing.

CC7: You gonna try to see, then hit me back?

Mann: Yeah, I'm gonna try to get in touch with him, yeah, I'll call you.

CC7: Alright.

Less than an hour later, at approximately 2:05 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-7 again. During that conversation, Coconspirator-7 and Mann had the following discussion:

Mann: Nah, I just tried to call your phone back a minute ago [U/I].

CC7: Huh, I probably--

Mann: What you was um, trying to do anyway?

CC7: That's what I'm trying to, I wanna, I wanna go in but I'm just gonna try ten dollars real quick cuz I don't want it, that shit, you feel me? I don't want it to be like before.

Mann: Oh, you wanted to see?

CC7: Yeah.

Mann: What you want, did you say how many?

CC7: Ten dollars.

Mann: Alright I'm gonna call him, I'll hit you back.

Based on the content of these two conversations and other intercepted communications, Coconspirator-7 asked Mann whether Mann had spoken with his supplier. Mann then called Coconspirator-7 back to ask Coconspirator-7 how many bricks of heroin Coconspirator-4 wanted to purchase ("What you was . . . trying to do anyway?"). Coconspirator-7 told Mann that he wanted to purchase ten bricks of heroin ("ten dollars"). Mann told Coconspirator-7 that he (Mann) would call his supplier.

49. At approximately 2:14 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using a cell phone with a telephone number ending in 9311 (hereinafter, the "Wright 9311 Phone"). Mann and Wright had the following conversation:

Mann: Yo, what's good my boy?

Wright: What's up?

Mann: Shit. You ain't never get yourself situated again?

Wright: I'm being situated a little later.

Mann: Alright.

Wright: Probably like around five [o'clock].

Mann: I'll call and tell him to hold them up then, I'll hit you back, let you know.

Wright: Alright. Just give me a number so I know, so I could put it together. I'll do it real quick and then call you.

Mann: I'm gonna try to lock him into it. I'll call you and tell I locked him into it, alright?

Based on the content of this conversation and other intercepted communications, Mann asked Wright when Wright would have fresh supply of heroin ("you ain't never get yourself situated again"). Wright told Mann that he (Wright) would have a fresh supply of heroin later at around 5:00 p.m. and told Mann to tell him the number of bricks that Mann needed so Wright could have it ready ("so I could put it together"). Mann replied that he (Mann) would try to lock his customer into a number.

50. At approximately 2:21 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-7. Mann and Coconspirator-7 had the following discussion:

Mann: Hello?

CC7: My bad cuz, I jumped in the shower, that's all, what's good though?

Mann: Umm, [U/I] told me to call him back at 4:30, 5 [o'clock].

CC7: Damn [U/I].

Mann: Yeah, I ain't talked to him in a minute, I'll call him back and see, you heard?

CC7: You said like 4:30, 5 [o'clock]?

Mann: Yeah.

CC7: Alright, just hit me.

Mann: Alright, see if you still want it? If he comes by?

CC7: Yeah, just hit me.

Mann: Alright.

Based on the content of these two conversations and other intercepted communications, Mann told Coconspirator-7 that his supplier (Wright) told Mann that he would be ready at around 4:30 or 5:00 p.m. Mann confirmed that Coconspirator-7 still wanted to purchase the ten bricks of heroin.

51. Later that day, at approximately 3:50 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-7 again and had the following exchange:

Mann: What's up cuzzo, you still want that definitely?

CC7: Yeah, yeah, yeah, definitely.

Mann: Alright.

CC7: What did he say?

Mann: Like, probably another hour or so, that's why I just call you.

CC7: Alright, make sure that, I want it though, when, but I'm just gonna do that, cuz I gotta see--

Mann: How it is--

CC7: How that shit is, you did explain it to him before, right?

Mann: Yeah, I told him, I explained it. So you'll just see right here, what it's like.

Based on the content of this conversation and other intercepted communications, Mann asked Coconspirator-7 whether Coconspirator-7 still wanted to purchase the ten bricks of heroin. Coconspirator-7 responded affirmatively, but stated that he wanted to see the bricks before purchasing them.

52. At approximately 4:05 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone). Mann and Wright had the following conversation:

Mann: Hello?

Wright: Yeah, what up?

Mann: Nothing, uh, you might have ten in a little bit?

Wright: Huh?

Mann: You might have like ten?  
Wright: Uh, yeah, how long?  
Mann: Uh, you want me to come down there and see you?  
Wright: Um, give me about a good half an hour, for, like an hour.  
Mann: I'll call you back in five.

Based on the content of this conversation and other intercepted communications, Mann asked Wright whether Wright could supply him (Mann) with 10 bricks of heroin. Wright agreed.

53. At approximately 6:00 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-7. Mann told Coconspirator-7, "I'll be there in like five minutes." Coconspirator-7 replied, "The liquor store, you know what I'm talking about?" Mann said, "Yeah, yeah, yeah, yeah. Where we always meet at."

54. At approximately 6:04 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. Mann told Wright, "Yo, come downstairs. I'm here." Wright replied, "Alright." Based on the content of this conversation and other intercepted communications, Mann and Wright met in order for Mann to pick up 10 bricks of heroin from Wright, which Mann then intended to sell to Coconspirator-7.

55. Less than ten minutes later, at approximately 6:13 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-7. Mann and Coconspirator-7 had the following exchange:

CC7: Where you at?  
Mann: On [Route] 21, I'm pulling up.  
CC7: Huh?  
Mann: I'm pulling in.  
CC7: Alright, I'm right here already.

Based on the content of this conversation and other intercepted communications, Mann and Coconspirator-7 met in order to conduct the 10 brick heroin transaction.

56. Shortly thereafter, at approximately 6:46 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. Mann told Wright, "Downstairs my boy." Wright, said "Alright." Based on the content of this conversation and other intercepted communications, Mann met with Wright following the 10 brick heroin transaction with Coconspirator-7.

57. At approximately 6:52 p.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using the Henderson 7984 Phone. Mann and Henderson had the following exchange:

Mann: I just came from down the H. I had to go see them real quick, I'm done with that shit though.

Henderson: You done with what?

Mann: With coming from seeing them.

Henderson: Yo they need help, you want help?

Mann: I just did something for them, ya. Other than that though I'll let you know.

Henderson: Oh you was helping?

Mann: I just bust a move for them, I didn't do more than that though.

Henderson: Oh alright.

Based on the content of this conversation and other intercepted communications, Mann told Henderson that he (Mann) had just helped Coconspirator-7 and Wright with a heroin transaction ("I just bust a move for them").

### **April 3 Transaction**

58. On or about April 3, 2015, at approximately 1:00 p.m., Mann, using the Mann 3772 Phone, spoke with a coconspirator (hereinafter, "Coconspirator-8"), who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:

Mann: What's good [Coconspirator-8]? How are you?

CC8: Ain't nothing. I'm going to need you a little bit later, more or less.

Mann: Today?

CC8: Yeah, probably be somewhere like around 20th Street.

Mann: What time?

CC8: Not sure exactly. I'm waiting on that, but, more I think, more or less definite though.

Mann: Alright, because I don't want to be all mo-- you know today Friday, start moving around

CC8: Yeah, nah, it ain't gonna be, ain't gonna be done late, you know what I mean, but I gotta make sure that it coincides with, you know what I mean, like everything coincides.

Mann: You talking about like 5 or 6 [o'clock]?

CC8: I can't cosign, I can't, you know what I'm saying, I can't put a stamp on it just yet but as soon as I can put a stamp on it I give you a accurate, you know what I'm saying, estimated time.

Mann: So, just, um, I'll call you back, probably like 4, so you give me, have an accurate time around then?

CC8: Should be, should be able to, you know what I'm saying but if it's any time before then, I hit you and let you know.

Mann: Alright.

Based on the content of this conversation and other intercepted communications, Coconspirator-8 told Mann that he (Coconspirator-8) needed Mann to arrange for a heroin transaction later that day. Based on my training and experience and based on subsequently intercepted communications, when Coconspirator-8 told Mann "somewhere like around 20th Street," Coconspirator-8 meant that he would need twenty bricks of heroin from Mann.

59. On or about April 3, 2015, at approximately 1:44 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Mann: Hey, yo (clears throat), um, probably come down that way and get what ya need, um, two, what's it, two, um, the twenty.

Wright: You need two hundred and twenty?

Mann: No, twenty.

Wright: Oh, twenty. alright

Mann: So--

Wright: Call me in about, um, like, alright, call me in about, um, well call me once you leave out, once you get settled.

Mann: Alright.

Wright: And I'm gonna have somebody run it to you.

Mann: Alright, I'll call you like at 2, some time



Wright:            Alright, alright, just call me.

Based on the content of this conversation and other intercepted communications, Mann told Wright that he (Mann) wanted to purchase twenty bricks of heroin from Wright. Wright agreed to supply Mann with the twenty bricks.

60.     At approximately 3:11 p.m., Mann, using the Mann 3772 Phone, received a text message from Henderson, who was using the Henderson 7984 Phone. In the text message, Henderson told Mann: "Asshole pick ic you want dat so I can tell you u were 2 go fool [sic]." Just a few minutes later, at approximately 3:12 p.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using the Henderson 7984 Phone. During that conversation,

Mann:            Salam alaikum.

Henderson:      Hey yo, damn man, when I call you, you gotta pick up the fucking phone, my nigga.

Mann:            I was in the shower, man.

Henderson:      Yo listen, they ready for you, you gotta um, they, they, he said come on now, because they not trying to move in and out, you heard?

Mann:            Alright.

Henderson:      So you gotta go now, cuz it ain't gonna be a lot of traffic, yo.

Mann:            Alright.

Henderson:      You know where they at?

Mann:            Down the, down the H, right?

Henderson:      Nah, they not in the H no more, I don't know where he wants you to go. Let me find out where he wants you to go and I'm gonna call you back, alright?

Mann:            Alright.

Henderson:      Alright.

Based on the content of this text message and telephone conversation, Henderson was instructing Mann to answer his phone so that Henderson could tell Mann where Mann should meet the supplier who would be delivering the twenty bricks of heroin. Henderson then told Mann that he (Henderson) would find out from the supplier where the supplier wanted Mann to meet him in order to conduct the heroin transaction.

61. At approximately 3:13 p.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using the Henderson 7984 Phone. Henderson told Mann, "They gonna meet you at the CVS up the street from the projects, alright" (referring to the CVS pharmacy located near the Pennington Court Location).

62. At approximately 3:37 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Mann: Yo, you there?

Wright: Um, they on their way to you right now, they should be there by now.

Mann: I'm about to pull up

Wright: Alright, hey yo, you gonna put the rest to the balance up in there that you gotta give me, right?

Mann: Yeah, I'm throw, yeah--

Wright: Alright, it's only two.

Mann: Mmhmm.

Shortly thereafter, at approximately 3:43 p.m., Mann and Wright spoke again as follows:

Wright: Yo.

Mann: Hey, yeah, I tried to tell you I had somebody in the car with me, I was trying to let you know, I only gonna charge that, this my people, man, real cool, I only charge them 110, so I can get 200, so I'll give you the hundred, and I got somebody else coming again, probably later on, I'll be able to clear you up, later on.

Wright: Alright.

Mann: Alright.

Wright: Alright.

Mann: Um, I'm in the parking, had to pull in the parking lot, but it's gonna, he gonna, um he'll be here at like five o'clock, I just, I was trying to wait but, I'll call you after 5 or something. To give it to you, I'm gonna take this and put it in the house.

Wright: Alright.

Mann:           Alright.

Based on the content of these two conversations and other intercepted communications, Wright told Mann that the supplier was en route and should be at the meeting location. Wright also reminded Mann about a debt that Mann owed to Wright. Mann told Wright that Mann was re-selling the bricks of heroin at a price of \$110 per brick because the customer was a close associate of Mann. Mann then indicated that he (Mann) would give Wright \$100 from that sale and that he anticipated having another heroin sale after which Mann would be able to repay Wright.

63.     At approximately 3:51 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Wright:       Hello?

Mann:        Yo.

Wright:       Hey yo, they about to pull up in there, I think that he said he only got fifteen on him right now.

Mann:        Oh, shit (laughs), oh shit.

Wright:       They got, it's twenty but five fell behind the dash so they can't get it out, so--

Mann:        Alright.

Based on the content of this conversation and other intercepted communications, Wright told Mann that the heroin supplier was about to arrive at the meet location and that the supplier only had fifteen bricks of heroin, instead of twenty bricks, because five of the bricks had fallen behind the dash board of the car in which the heroin was being transported.

64.     At approximately 4:00 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. Wright told Mann, "Hey, yo, go on Penn Ave and South Street, they right there on the corner waiting for you." Mann replied, "Alright."

65.     Shortly thereafter, at approximately 4:06 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. Mann and Coconspirator-8 had the following discussion:

CC8:         Yo.

Mann:        What's good my boy?

CC8:         What's going on?

Mann: I was just letting you know I got, um, about to grab that for you, alright?

CC8: Alright, should be about 5, 5:30 [o'clock].

Mann: Alright.

CC8: Alright, just hit me like, around, just hit me at 5 [o'clock], you know, so I'll tell you how much longer, just a few minutes or whatever. But it should be right around then, depending on traffic.

Mann: Alright.

CC8: Alright.

Based on the content of this conversation and other intercepted communications, Mann told Coconspirator-8 that he (Mann) was about to pick-up the bricks of heroin that Coconspirator-8 had ordered from Mann earlier that day. Coconspirator-8 told Mann that he (Coconspirator-8) should be ready to conduct the purchase with Mann at around 5:00 or 5:30 p.m.

66. At approximately 4:13 p.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. Mann told Wright, "Hey yo, tell um, Murder to call me. I don't go this number in this phone." Wright replied, "Alright, I'm about to have him call you now." Shortly thereafter, Mann, using the Mann 3772 Phone, received a call from Latham, who was using the Latham 3987 Phone. Mann told Latham, "Come, um, I'm right here by the east [U/I]. He can get ready to come downstairs or whatever. Based on the content of this conversation and other intercepted communications, Mann asked Wright to have Latham call him (Mann) so that Mann could speak with Latham about the heroin transaction that Mann was coordinating.

#### **April 7 Transaction**

67. On or about April 7, 2015, at approximately 1:06 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:

Mann: What's good my boy?

CC8: Ain't nothing, ain't nothing, um, what time is it right now?

Mann: Huh?

CC8: Yeah, at like four I'm gonna need--

Mann: What you said?

CC8: I said at four I'm gonna need, that uh, whatchamacallit that, I talked to you about. Twenty.

Mann:            Alright. I'll be there.

CC8:             If there's anything before that I'm gonna hit you, but I doubt it. Uh, think I'm spin this one nigga [U/I]. I'm happy you ain't [U/I] you know what I'm saying?

Mann:            Yeah.

CC8:             Alright.

Mann:            So wait, [Coconspirator-8]?

CC8:             Yo.

Mann:            I'm gonna do it, I'm gonna get it and hold it for you now, I'll put it up for you then.

CC8:             Yeah, do that, you know what I'm saying? But like I said if it go up, I'm gonna let you know, but definitely that.

Mann:            Alright, so you don't have to call me, alright.

CC8:             Yeah, 20th, alright?

Mann:            Alright my boy.

Based on the content of this conversation and other intercepted communications, Coconspirator-8 told Mann that he (Coconspirator-8) would need to purchase twenty bricks of heroin from Mann later that day. Mann told Coconspirator-8 that he (Mann) would purchase the bricks of heroin and hold it for Coconspirator-8. Coconspirator-8 then told Mann that he (Coconspirator-8) would let Mann know if he needed more ("if it go up"), but that Coconspirator-8 would definitely need the twenty bricks.

68.     At approximately 1:56 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following exchange:

Mann:            Um, you got twenty around?

Latham:           Yeah.

Mann:            Alright, uh, give me like an hour, I just got to do something. I'm gonna come get it. Where you want me to come when I call ya? But it'll be like at four [o'clock]. I just got [U/I] so give me like an hour I just gotta do something.

Latham:           Alright, um, oh yeah, you [U/I] Riverview?

Mann: Come down Riverview?  
Latham: Yeah.  
Mann: I'm gonna hit you like at 2:30, 3, what time is it, 2:00?  
Latham: Yeah.  
Mann: Give me like an hour, 3:00, I'll be with you.  
Latham: Alright, cool. 3:00 good, I'll, I'll meet you.  
Mann: Ok.  
Latham: Hey you know, you know you gotta give me two hundred from the other day, right?  
Mann: I know, I know.  
Latham: Alright.

Based on the content of this conversation and other intercepted communications, Mann called Latham in order to obtain the twenty bricks of heroin that Coconspirator-8 had ordered from Mann. Latham confirmed that he (Latham) could supply the twenty bricks of heroin and told Mann to meet him at the Riverview Court Location. Further, Latham reminded Mann that Mann owed Latham \$200 from a prior narcotics transaction.

69. On or about April 7, 2015, at approximately 2:57 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:

Mann: What's good my boy?  
CC8: Yeah, check it out, um, come fuck with me, I need uh, two five.  
Mann: Two five, I'm on my way up to you.  
CC8: How long you think?  
Mann: Give me like twen-- like twenty minutes I'll be there.  
CC8: Alright, I'm still waiting for my other peoples but I got, I got enough for you to hold you down for most of that right now.  
Mann: Alright, that's it for the day now right? That twenty, twenty-five?  
CC8: Yeah.  
Mann: Alright.

CC8:            Alright.

Based on the content of this conversation and other intercepted communications, Coconspirator-8 told Mann that he (Coconspirator-8) would need an additional five bricks of heroin, for a total of twenty-five bricks. Mann told Coconspirator-8 that he (Mann) could obtain the additional five bricks in short order.

70.     At approximately 2:58 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following discussion:

Latham:        Yo.

Mann:          Salam alaikem. Yo bro, hello?

Latham:        Yo.

Mann:          Yeah, make it um, make it two-five [U/I]. I'll take care of you with.

Latham:        Alright.

Mann:          Are you down there?

Latham:        Uh, yeah, I'm on my way there now.

Mann:          How long you gonna be?

Latham:        Um, I'm a be there, but old girl in the car behind me with the, with the other shit I gotta, I gotta, I gotta call until they get another [U/I], yo, let me call.

Mann:          Alright.

Based on the content of this conversation and other intercepted communications, Mann told Latham that he (Mann) needed a total of twenty-five bricks of heroin. Latham indicated that he was on his way to the Riverview Court Location.

71.     At approximately 3:44 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:

Mann:          Hello?

CC8:            Uh, yeah, how you looking bro?

Mann: I'm on my way to you now [U/I], a little traffic, you know after school where I be at. I'm coming up there right now, in like probably, five, six minutes.

CC8: Oh, aight.

Based on the content of this conversation and other intercepted communications, Mann picked up the twenty-five bricks from Latham and was then driving to conduct the twenty-five brick transaction with Coconspirator-8.

72. At approximately 4:10 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann told Latham that he (Mann) was at "on Chapel at the light," referring to the Chapel Street, which leads to the Riverview Court Location—where Latham had instructed Mann to pick up the heroin.

73. Shortly thereafter, law enforcement officers with the FBI were conducting physical surveillance near the Riverview Court Location. Officers observed Mann driving a 2009 Gray Honda Accord, bearing New Jersey license plate URM-50W, and registered to an address in Newark, New Jersey (hereinafter, the "Mann Accord"). After parking the Mann Accord in front of 28 Riverview Court, Mann got out of the Mann Accord and approached the Riverview Court public-housing complex. Officers observed Mann meet with a female coconspirator (hereinafter, "Coconspirator-9"), who handed Mann a black plastic bag. Mann then returned to the Mann Accord and drove-off. As Mann turned right onto Chapel Street, he made eye contact with law enforcement officers with the FBI. Thereafter, law enforcement officers briefly questioned Coconspirator-9.

74. At approximately 4:22 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following conversation:

Mann: Hello?

Latham: Hey yo,

Mann: Yeah?

Latham: Hey yo, you, you, you made it out safe?

Mann: Huh?

Latham: You made it out safe?

Mann: Yeah, yo, I seen that truck.

Latham: Yo, they grabbed her.

Mann: They grabbed her?



Latham: Yeah.

Mann: Two white boys right?

Latham: Yeah.

Mann: Figured they, I looked at them, like, whoa, cause they parked in the cut. When I came out, I seen them right there. I'm like, that shit ain't look good, you know? I figured that. My heart was beatin, I went the other way, I seen them.

Latham: But she had already gave it to you already?

Mann: Yeah.

Latham: Aight.

Based on the content of this conversation, Latham told Mann that law enforcement officers had stopped Coconspirator-9 who had provided Mann with the plastic bag containing the bricks of heroin. Mann asked if the officers had been two white men and then told Latham that he (Mann) had figured that they were police officers. Mann confirmed to Latham that Coconspirator-9 had provided the bag of narcotics to Mann while the officers were watching.

75. At approximately 4:28 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following discussion:

Mann: Hello?

Latham: Yeah bro. Salaam alaikum.

Mann: Alaikum salaam. I've seen them too right, when I was coming out. You heard?

Latham: Yeah.

Mann: When I was comin out I seen them, two crackers sittin there, and I'm like damn, then when I shot out, they shot right up in there. And I'm like, damn those mother fuckers don't, don't look right, you feel me? And I seen the lights at the top of they truck, like in the inside. So I didn't go down, I didn't hit Raymond, I hit, I head straight, straight through the by, by, by Hyatt way. So I figure, I'm like that's probably a trap, they probably hit you like pull up, hit that car, but I'm ahead of that shit. I was driving fast too. I ain't stop at the light or nothin over that motherfucker.

Latham: You safe, you safe?  
Mann: Yeah, I'm good. I'm Gucci.  
Latham: Alright, alright, alright alright, alright.  
Mann: I'll hit you back.

Based on the content of this conversation, the physical surveillance conducted by law enforcement officers with the FBI, and other intercepted communications, Mann and Latham discussed law enforcement presence at the Riverview Court Location. Mann told Latham that, as he (Mann) was leaving, he had seen two white law enforcement officers ("two crackers sittin there") in law enforcement vehicles ("I seen the lights at the top of they truck, like in the inside") as he was leaving. Mann then told Latham that he drove off at a fast rate of speed and did not stop for traffic lights because he did not want to be pulled over after having picked up a shipment of heroin.

76. At approximately 4:34 p.m., Mann and Latham spoke again as follows:

Mann: Hello?  
Latham: Hey yo, so they was parked, they was parked there already when they when you got in? [Someone else in the background: They had to be.]  
Mann: Nah I didn't see, yeah they was parked, I didn't take, I didn't peep it until when I pulled out. When I pulled out I peeped it cause they shot right in and I'm glad, cause I, I floored it when I when I peeped and I turned and said these two crackers, these mother fuckers don't look right to me but I already had it so they shot in I see em zoom in I'm like that's them.  
Latham: [U/I]  
Mann: But I didn't think they--  
Latham: But they, they ain't seen her give you the shit, right?  
Mann: They probably did. I don't, I'm, I'm, cause I, I caught it afterwards. After you know, I mean, I seen the after effect you know?  
Latham: Yeah.  
Mann: When I seen it I was done already and I'm like fuck, that shit and that shit scared me I'm like oh my god you feel me and I had to I had to I had to just go nah I mean cause I ain't gonna sit there and play around with that shit.

Latham: Aright.

Mann: Aright bro.

Based on the content of this conversation, the physical surveillance conducted by law enforcement officers with the FBI, and other intercepted communications, Latham asked Mann whether Mann thought that law enforcement had observed Coconspirator-9 hand the bag containing the heroin to Mann ("they ain't seen her give you the shit"). Mann told Latham that he thought that officers had, in fact, observed the exchange and that Mann had been scared as a result.

77. At approximately 10:50 p.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using the Henderson 7984 Phone. During that conversation, Henderson and Mann had the following exchange:

Mann: Salaam alaikum. Salaam alaikum.

Henderson: Laikum salaam. What's good yo?

Mann: What's up with you sheik?

Henderson: Shit stressed out

Mann: Stressed out?

Henderson: Yo word, BON burnt down you heard?

Mann: Yeah. Mmhmm. I was there.

Henderson: That was cray-- that was crazy son. Told you my nigga, when they when niggas is sitting down it just ain't nothin my nigga. I know that be your way of gaining a couple of points but like you gotta be careful my nigga you ain't you can't afford a mother fucking case my nigga.

Mann: Yeah I know.

The conversation between Henderson and Mann then continued as follows:

Henderson: And I'm like bro you gotta understand bro if, if, if that bitch get popped, my nigga, we gotta bail her out my nigga.

Mann: Yeah.

Henderson: I'm not in the rush to make no money out here my nigga. If this, if money could be made and I could make it I'm (U/I) you feel me but I'm not gonna be out here bendin over backwards my nigga we too old for that shit son, real talk.

Mann: Yeah you right. My heart was beatin like a mother fucker I'm like yo, I seen them when they shot up in their truck I'm looking through the mirror for [U/I] when I came through, when I came out they right there. I'm like aw man but I put, I stepped on it, I'm like maybe they got, you know if they're around they got other people around too, you feel me?

Henderson: Yeah that was BON, they just [U/I] that park right there, they gonna start smackin that shit. They gonna beat that shit up this summer watch. I said how many niggas be cased up cause of BON this summer in them projects. They gonna start smackin that shit apart right there son. That's, that's BON bound. Sheriff's got time, you know what I'm sayin, that shit Sheriff bound yo.

Mann: Yeah.

Based on the content of this conversation and other intercepted communications, Henderson told Mann that detectives with the Essex County Sherriff's Bureau of Narcotics ("BON") had stopped and questioned Coconspirator-9. Henderson told Mann that if law enforcement arrested Coconspirator-9 ("if that bitch get popped"), then they would need to pool money to help Coconspirator-9 make bail. Henderson and Mann then discussed BON's enforcement activities during the upcoming summer months.

#### **April 8-9 Transactions**

78. On or about April 8, 2015, at approximately 5:14 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following exchange:

Mann: Salaam alaikum.

Latham: Alaikum salaam.

Mann: Hey, yo, um, I'm trying to see how to say this, uh, you know that, that thing, somebody, somebody wants, um, see what it's like, they want to know if it work for both ways, it need to be right, cuz they want, they want fifty dollars.

Latham: Alright, um, I'm set, I got, I got em done up already.

Mann: Nah, they want, they want to see how it is, they want to see it, if it work both ways, before they do it. They said because they got some from me before and they said it only went the one way, the straight way. Like they hit it to the low, not the other one.

Latham: Oh, alright, well um, uh, umm, what you need, you need you need you need the pictures and shit, right? Yeah.

Mann: I'll be out in a little bit. I just got up, I got a fucking headache.

Latham: Alright, um, come to Hyatt Court.

Mann: I'll call you when I get up.

Based on the content of this conversation and other intercepted communications, Mann told Latham that he (Mann) was being careful in expressing himself ("I'm trying to see how to say this") and that he (Mann) had someone who wanted to purchase fifty bricks of heroin ("they want fifty dollars"). Latham replied that he (Latham) already had fifty bricks packaged and ready to be sold ("I got em done up already"). Mann told Latham that the customer wanted to test the heroin prior to purchasing it ("they want to see how it is . . . if it work both ways"). Latham told Mann to meet him at the Hyatt Court Location.

79. On or about April 9, 2015, at approximately 1:49 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-1. Mann and Coconspirator-1 had the following conversation:

CC1: You got that um, color I asked you for last time?

Mann: Nah they ain't got none of that right now. [U/I] later. Are you straight?

CC1: Alright, yeah, if you don't got that, then I don't want nothing.

Mann: Which [U/I], which bag you in?

CC1: The "Dragonfly."

Mann: That's, that's what you got now?

CC1: No, I got "A-1 Steak Sauce" and "BSR."

Mann: What you saying, who you got that off?

CC1: Uh, my regular.

Mann: Oh, alright. I got, I got some that's pretty good, know what I mean, I don't, I don't know.

CC1: What's it? What is?

Mann: I got it, it's a red name, but it ain't, it ain't the other one.

CC1: Alright, I'ma see, give me a minute. Let me see.

As the conversation continued, Mann and Coconspirator-1 had the following exchange:

CC1: I only got, I only got two thirty though right now, that's all

Mann: You got now?  
CC1: Huh?  
Mann: What you got?  
CC1: Two thirty [dollars], right now, that's what I'm saying. That's why I said wait til 2:30.  
Mann: Oh you only got two thirty right now?  
CC1: Yeah.  
Mann: Well I'll get that for you probably later.  
CC1: Alright.

Based on the content of this conversation and other intercepted communications, Mann and Coconspirator-1 discussed different kinds of heroin. Coconspirator-1 told Mann that Coconspirator-1 had heroin stamped with the labels "A-1 Steak Sauce" and "BSR." Mann then told Coconspirator-1 that he (Mann) had heroin that was popular and that it had a red heroin stamp ("it's a red name"). Coconspirator-1 told Mann that Coconspirator-1 only had \$230 at the moment, and Mann then told Coconspirator-1 that they could conduct the transaction later.

80. Shortly thereafter, at approximately 1:53 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. Mann and Latham had the following conversation:

Latham: Yo.  
Mann: Salaam alaikum.  
Latham: Yo.  
Mann: What area you in, you around, you out?  
Latham: Huh, yeah, I'm out, um, I'm over here by like, uh, Penn Ave, right where you met me at, about--  
Mann: Alright, I need, I, I, I'll be there, I know, I got ya, I got ya, I know exactly where you at. I need, um, two but I'm gonna have to see you later, I need that picture so I could let these niggas see it while I'm out. I'm tired.  
Latham: Alright.

Based on the content of this conversation and other intercepted communications, Mann asked Latham whether Latham could supply Mann with two bricks of heroin. Mann also told Latham

that he (Mann) needed a sample of heroin ("I need that picture") so that Mann could provide it to the individuals who wanted to purchase the fifty bricks of heroin that Mann and Latham had discussed the previous day.

81. At approximately 2:07 p.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using the Henderson 7984 Phone. During that conversation, Henderson and Mann had the following exchange:

Mann: Shit, I ain't doing nothing, about to just--

Henderson: Where you at, in the house?

Mann: No I'm outside, had to see something, see these little pictures--

Henderson: Yo son, I'm about to, this number, I'm about to, this number about to be dead. I got a new phone. But I can't give you my new number until you get a new phone. . . .

Mann: Alright I'll hit you back

Based on the content of this conversation and other intercepted communications, Mann referenced to Henderson that heroin samples that Mann was attempting to obtain from Latham ("these little pictures"). Henderson then told Mann that he (Henderson) was about to drop the Henderson 7984 Phone and starting using a new cell phone, but he told Mann that he would not be giving Mann his new cell phone unless Mann also got a new cell phone. Based on my training and experience, narcotics traffickers frequently change cell phones in order to thwart law enforcement investigation into their activities.

82. At approximately 2:38 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-1. Mann told Coconspirator-1 to "come to the back of the building" and "come behind Dawson, behind the wall" (referring to Dawson Street at the Pennington Court Location"). Based on the content of this conversation and other intercepted communications, Mann picked up the two bricks of heroin from Latham and was delivering those two bricks of heroin to Coconspirator-1 at the Pennington Court Location.

#### **April 10-11 Transactions**

83. On or about April 10, 2015, at approximately 6:46 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:

Mann: Two five for tomorrow?

CC8: Two five, definitely.

Mann: Alright, uh, alright. I'll hit you back. You gonna be, you gonna be right there?

CC8: I ain't right there right now.

Mann: What time you gonna be around then?

CC8: I ain't gonna be to, I ain't gonna be, I wasn't gonna come over there unless, you know what I mean. If you tell me definitely, then I'll meet you over there.

Mann: Alright, I'll hit you right back in two minutes, answer the phone.

Based on the content of this conversation and other intercepted communications, Coconspirator-8 told Mann that he (Coconspirator-8) would definitely need twenty-five bricks of heroin tomorrow. Mann told Coconspirator-8 that he (Mann) would call Coconspirator-8 back.

84. Shortly thereafter, Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following exchange:

Latham: Yo.

Mann: What's up, bruh, salaam alaikum.

Latham: Salaam what up?

Mann: I'm trying to see how to figure this out because, my peoples coming and I think like twenty-eight, and um, but it's going to be late and I ain't going to be able to get to you early in the morning because I got to go somewhere with my mother and I don't come back until the evening tomorrow like 6 or 7 [o'clock]. You know what I mean?

Latham: Aight, it's cool, it's cool because we got to go put it together, so give me some time, I will put it together for you.

Mann: What time do you want me to hit you then?

Latham: Umm-- just hit me tonight.

Mann: Aight, I'ma hit you tonight.

Based on the content of this conversation and other intercepted communications, Mann asked Latham for twenty-eight bricks of heroin, twenty-five of which Mann intended to sell to Coconspirator-8. Latham told Mann that Latham and his associates needed time to package the twenty-eight bricks and asked Mann to call him (Latham) back later that night.

85. On or about April 11, 2015, at approximately 11:24 a.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:



CC8: I definitely got something for ya later on or early on the next--

Mann: Alright that's um, that's what I'm tryin to say, what's what's--

CC8: Now that one, that one is, that one I don't wanna, I don't wanna sit on it. I want that, [U/I], I don't wanna wait till they reach, you know what I'm sayin. This right here is guaranteed I know that, you naw I mean but if neither one of us is gonna be there I ain't tryin to put nobody in the middle of all that.

Mann: Yeah.

CC8: So I'll work that how I usually work that out but this um, but this shit for tomorrow, for later on tomorrow, I want be able to get with you so I could, you know what I'm sayin?

Mann: Alright, what is, you don't know yet?

CC8: Supposed to be one-- uh, one nine.

Mann: Nineteen for tomorrow? Alright.

CC8: Yeah.

Mann: Alight.

CC8: Alight.

Mann: Tell em I'll be there aright, I'll call you tonight, I'ma get it put up, keep it with me, alright?

Based on the content of this conversation and other intercepted communications, Coconspirator-8 told Mann that he (Coconspirator-8) needed nineteen bricks of heroin for tomorrow.

86. Immediately after the foregoing conversation, starting at approximately 11:24 a.m., Mann, using the Mann 3772 Phone, attempted approximately three times to reach Latham using the Latham 3987 Phone. After being unable to reach Latham at the Latham 3987 Phone, Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Wright: Yo.

Mann: What's good bro, how are you?

Wright: What up?

Mann: You sleeping?

Wright: Yeah.

Mann: I was supposed to call [U/] um "Murder" this morning, he told me to get with him, I hit him like eight, I missed, I missed that one um it was a two eight, it was, it was twenty-five center, I missed it cause I had to go with my family, I told him I wasn't gonna be around here, I had to get with him earlier in the morning. I missed it, but tell him um when we get up to hold me twenty for later I got somebody else comin.

Wright: Aright.

Mann: Aright.

Based on the content of this conversation and other intercepted communications, Mann told Wright that he (Mann) had attempted to reach Latham ("Murder") this morning. Mann told Wright to tell Latham that he (Mann) had another customer (Coconspirator-8) who wanted to purchase twenty bricks of heroin and to ask Latham to set aside twenty bricks of heroin for Mann.

#### **April 12-13 Transactions**

87. On or about April 12, 2015, at approximately 11:24 a.m., Mann, using the Mann 3772 Phone, spoke with Wright, who was using the Wright 9311 Phone. During that conversation, Mann and Wright had the following exchange:

Mann: Hello?

Wright: Yeah yo, what's good. What's up with that change yo?

Mann: He never came by. I'm still in the house waiting. I was going to call you to come by my house now to look at something. I'm waiting on the kid to come I still got it. Right in my room.

Wright: So, when he coming?

Mann: Tonight or early tomorrow, you'll get it by tomorrow if not I'll just give it back, it don't matter.

Wright: Alright, aint no problem, bro.

Based on the content of this conversation and other intercepted communications, Wright asked Mann whether Mann had sold bricks of heroin that Mann had received from Wright and when Wright could expect to be paid. Mann told Wright that the heroin customer never came, that Mann expected the customer to come later than night or early the following morning, and that Wright would either receive the money (if the sale went through) or Mann would return the bricks of heroin (if the sale fell through).

88. On or about April 13, 2015, at approximately 11:16 a.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following exchange:

Mann: Hello?

Latham: Hello.

Mann: Salaam alaikum.

Latham: Alaikum salaam. Hey yo, whatever happened, yo?

Mann: I told you, Hersh called me last night. I told Hersh he can come at, um, [U/I] came to my house. I was gonna give it to her but, said that his baby mother sister had died so he gonna try, he gonna get up here today, I'm just waiting, so if not I'll just bring it back tonight to you whatever.

Latham: Alright, cuz, like we, we running, we getting kinda low so, if he ain't gonna take them shits I could use them shits.

Mann: I got you, just wait til tonight see what happens. Alright bro.

Latham: Alright.

Based on the content of this conversation and other intercepted communications, Mann told Latham that he (Mann) had spoken with Wright the previous evening and told Latham about that conversation. Latham replied that he and his associates were running low on heroin and that, if Mann's customer did not purchase the bricks, Latham and his associates could use them for other heroin transactions.

#### **April 14-15 Transactions**

89. On or about April 14, 2015, at approximately 8:30 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann and Latham had the following exchange:

Latham: Yo

Mann: Salaam alaikum, aye sheik.

Latham: What's going on, yeah?

Mann: I'm tryna figure out, tomorrow I got two people lined up, I don't know if you going be rocking, I'm tryna see, twenty-five is the [U/I] possibility, but twenty-five is definitely a go tomorrow so.

Latham: So we ain't got it.

Mann: I know.

Latham: I think "S" might got it though.

Mann: Oh yeah.

Latham: Yeah I'ma call him, I'm bout to call him and see, I'ma line it up to make sure that the shit is there.

Mann: Aight.

Based on the content of this conversation and other intercepted communications, Mann told Latham that he (Mann) had a heroin customer who wanted to purchase twenty-five bricks of heroin the following day. Latham indicated that he and his associates did not have twenty-five bricks at the moment, but that he (Latham) would make a call to obtain it ("I'ma line it up").

90. Shortly thereafter, at approximately 8:49 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Latham told Mann, "Yo, bruh said he was going to have them in the morning" (meaning that Latham had spoken with another supplier of heroin who could provide the twenty-five bricks of heroin the following morning).

91. The following morning, on or about April 15, 2015, at approximately 11:11 a.m., Mann, using the Mann 3772 Phone, spoke with Henderson, who was using the Henderson 7984 Phone. During that conversation, Mann and Henderson had the following exchange:

Mann: You still in the house?

Henderson: Nah, I'm just, I'm in the car right now.

Mann: [U/I] stop first or you got to do somethin'?

Henderson: My nigger, what you want. I'm comin, I'm out here, what you want?

Mann: Stop by my house man, I need to tell you something--

Henderson: You gotta me-- alright, uh, you out, you gotta meet me on H my nigger, cause I'm about to be movin crazy right now. Murder already told me, that's what you want.

Mann: Yeah, but I think it's gonna be um a little more added to it that's what I'm tryin fuckin to tell you.

Henderson: Alright, meet me on the H, I'm going right now, you heard.

Mann: Alright.

Henderson: You hear me.

Based on the content of this conversation and other intercepted communications, Henderson told Mann that Latham ("Murder") had already told him (Henderson) the number of bricks of heroin that Mann needed. Mann then told Henderson that he (Mann) may need some additional bricks. Mann and Henderson then discussed meeting up in person to discuss the matter.

92. At approximately 12:38 p.m., Mann, using the Mann 3772 Phone, spoke with Coconspirator-8, who was using the Coconspirator-8 3338 Phone. During that conversation, Mann and Coconspirator-8 had the following exchange:

Mann: What's up, Coconspirator-8?  
CC8: Yeah so like around the same time.  
Mann: Around what 4 [o'clock]?  
CC8: Yeah.  
Mann: Um, um, um for forty-four right? I was just trying to confirm it.  
CC8: Huh?  
Mann: I was trying to confirm it, the forty-four right?  
CC8: Yeah.

Based on the content of this conversation and other intercepted communications, Coconspirator-8 confirmed for Mann that Coconspirator-8 needed forty-four bricks of heroin at around 4:00 p.m.

93. At approximately 6:39 p.m., Mann, using the Mann 3772 Phone, received a text message from Henderson, who was using the Henderson 7984 Phone. The text message stated, "My ni\*\*a i got it on me wtf" (referring to the bricks of heroin with which Henderson intended to supply Mann).

**Attempt to Mislead Law Enforcement by Removing the GPS-Tracking Device and Installing in on Another Vehicle**

94. On or about April 20, 2015, at approximately 7:32 p.m., Mann, using the Mann 3772 Phone, spoke with Latham, who was using the Latham 3987 Phone. During that conversation, Mann told Latham that he (Mann) needed to talk to Latham in person. When Latham told Mann that he (Latham) did not want to go "all the way over there" to meet Mann, Mann told Latham, "No, this is, this is important man, come over." Based on the content of this conversation and subsequent events discovered during the investigation, Mann called Latham to tell Latham that he (Mann) had discovered a GPS-tracking device that law enforcement had surreptitiously installed on the Mann Accord.

95. On or about April 21, 2015, a GPS-tracking device surreptitiously installed on the Mann Accord indicated that the Mann Accord was parked at a Lukoil gasoline station on McCarter Highway in Newark, New Jersey (hereinafter, the "Lukoil"). Surveillance video from the Lukoil shows that Mann, driving the Mann Accord, arrived at the Lukoil at approximately 11:25 p.m. Shortly thereafter, at approximately 11:28 p.m., Henderson arrived in a dark-colored Jeep Grand Cherokee, bearing a New Jersey battleship license plate, got out of the vehicle, and got into the passenger-side of the Mann Accord. After a brief meeting, Henderson got back into his vehicle and drove off, while Mann remained behind.

96. Based on the Lukoil surveillance video, information obtained from the GPS-tracking device, and GPS information received from the Mann 3772 Phone, Mann discovered that law enforcement had installed a GPS-tracking device on the Mann Accord, removed the device from the Mann Accord, and provided that device to Henderson. Subsequently, Henderson placed the GPS-tracking device on another vehicle in Jersey City, New Jersey.