
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

ISHMAEL ABDULLAH, a/k/a "Ish,"
a/k/a "Gangsta," a/k/a "Papi,"
KEITH HUNTER, a/k/a "Meech,"
JOSE JOAQUIN TORRES-MEZQUITA,
a/k/a "Alex Torres," a/k/a "Papi,"
a/k/a "Pa," a/k/a "Pop,"
BERNADINO GUERVIL, a/k/a "BG,"
ELIJAH ABDULLAH, a/k/a "Uncle E,"
a/k/a "E,"
PRINCE SARNOE,
THOMAS ROGERS, a/k/a "Herb,"
a/k/a "T-Rod,"
CHRISTOPHER PROCTOR, a/k/a "Bris,"
a/k/a "Bris Broctor,"
ILEANA SANCHEZ, a/k/a "Lilly,"
INDIA DANIELS

CRIMINAL COMPLAINT

Mag. No. 16-1525

RECEIVED

DEC 06 2016

DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE


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

SEE ATTACHMENT A

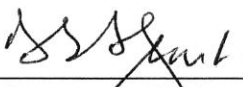
I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.


BRIAN K. MCCAFFERY
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE
DECEMBER 6, 2016
TRENTON, NEW JERSEY


HON. DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One

Between in or around June 2015 and in or around November 2016, in Mercer County, in the District of New Jersey and elsewhere, the defendants,

ISHMAEL ABDULLAH, a/k/a "Ish," a/k/a "Gangsta," a/k/a "Papi,"
KEITH HUNTER, a/k/a "Meech,"
JOSE JOAQUIN TORRES-MEZQUITA,
a/k/a "Alex Torres," a/k/a "Papi," a/k/a "Pa," a/k/a "Pop,"
BERNADINO GUERVIL, a/k/a "BG,"
ELIJAH ABDULLAH, a/k/a "Uncle E," a/k/a "E,"
PRINCE SARNOE,
THOMAS ROGERS, a/k/a "Herb," a/k/a "T-Rod,"
CHRISTOPHER PROCTOR, a/k/a "Bris," a/k/a "Bris Broctor,"
ILEANA SANCHEZ, a/k/a "Lilly,"
INDIA DANIELS,

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, Section 846.

Count Two

On or about November 9, 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

ISHMAEL ABDULLAH, a/k/a "Ish," a/k/a "Gangsta," a/k/a "Papi,"

having been convicted in the Superior Court of New Jersey, Mercer County, of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce, a firearm, namely, a nine-millimeter SCCY Industries CPX-2, bearing serial number 148014.

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

Count Three

On or about August 23, 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

CHRISTOPHER PROCTOR, a/k/a "Bris," a/k/a "Bris Broctor,"

having been convicted in the Superior Court of New Jersey, Mercer County, of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce, a firearm, namely, a Glock 27, bearing serial number WKU950.

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

ATTACHMENT B

I, Brian K. McCaffery, have been a Special Agent with the Federal Bureau of Investigation ("FBI") since 2009, and I have been involved personally in the investigation of this matter. The information contained in this complaint is based on my personal knowledge and on information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of documents and evidence obtained through Court orders, subpoenas, and other sources; (c) assistance provided to law enforcement by multiple confidential sources of information; and (d) my review of wire and electronic communications intercepted pursuant to court-authorized wiretaps. Because this 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 contents 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 are based on partial, non-verbatim summaries and quotations of conversations based on descriptions of the conversations prepared by monitors.

BACKGROUND

1. From at least as early as in or around June 2015 through in or around December 2016, defendant ISHMAEL ABDULLAH and others conspired to operate a drug-trafficking organization ("DTO") in and around Trenton, New Jersey, identified herein as the "Abdullah DTO." In furtherance of the conspiracy, members of the Abdullah DTO, among other things, obtained large quantities of heroin from multiple suppliers and distributed those and other narcotics to other co-conspirators, various dealers, sub-dealers, and end users for profit.

2. At all times relevant to this Complaint:

a. ISHMAEL ABDULLAH, a/k/a "Ish," a/k/a "Gangsta," a/k/a "Papi," was a leader of the Abdullah DTO, and, in conjunction with his co-conspirators, sold heroin in and around Trenton, New Jersey. ABDULLAH coordinated the DTO's procurement of heroin from multiple sources, and the distribution of that heroin to his associates for sale to other drug dealers and end purchasers in and around Trenton. On or about May 11, 2015, ABDULLAH was convicted in the Superior Court of New Jersey, Mercer County, of aggravated assault with attempt to cause bodily injury with a deadly weapon, in violation of N.J.S.A. 2C:12-1B(2), a felony punishable by more than one year in prison.

b. KEITH HUNTER, a/k/a "Meech," was a trusted associate of ABDULLAH. HUNTER assisted ABDULLAH with obtaining supplies of heroin

from multiple sources and distributing the narcotics to other members of the Abdullah DTO for re-distribution. HUNTER also distributed heroin personally to other narcotics dealers and end purchasers.

c. JOSE JOAQUIN TORRES-MEZQUITA, a/k/a "Alex Torres," a/k/a "Papi," a/k/a "Pa," a/k/a "Pop" (hereafter, "TORRES") was a supplier of heroin to ABDULLAH and his associates. The investigation has revealed that during the conspiracy, ABDULLAH amassed a large debt for narcotics that TORRES and his associates previously had supplied. Notwithstanding this debt, TORRES continued to supply heroin to ABDULLAH and other members of the Abdullah DTO while the debt was repaid.

d. ILEANA SANCHEZ, a/k/a "Lilly," was an associate of TORRES, ABDULLAH, and BERNADINO GUERVIL. SANCHEZ supplied ABDULLAH with quantities of heroin and communicated with both ABDULLAH and TORRES in furtherance of the conspiracy.

e. BERNADINO GUERVIL, a/k/a "BG," was a trusted associate of ABDULLAH who participated in the Abdullah DTO's unlawful heroin distribution operation. During a telephone call between ABDULLAH and TORRES that was in furtherance of the conspiracy, ABDULLAH indicated that GUERVIL was his "right-hand man."

f. ELIJAH ABDULLAH, a/k/a "Uncle E," a/k/a "E," was ISHMAEL ABDULLAH's younger brother and a member of the Abdullah DTO who, among other things, distributed heroin in and around Trenton. ELIJAH ABDULLAH regularly communicated with ISHMAEL ABDULLAH, HUNTER, CHRISTOPHER PROCTOR, and other co-conspirators in furtherance of the conspiracy.

g. CHRISTOPHER PROCTOR, a/k/a "Bris," a/k/a "Bris Broctor," was another member of the Abdullah DTO and an associate of, among others, ISHMAEL ABDULLAH, HUNTER, and ELIJAH ABDULLAH. PROCTOR participated in the Abdullah DTO's operations by, among other things, obtaining heroin from other co-conspirators and distributing those narcotics to other dealers and end users in and around Trenton. On or about October 29, 2015, PROCTOR was convicted in the Superior Court of New Jersey, Mercer County, of possession with intent to distribute a controlled dangerous substance on or near school property, in violation of N.J.S.A. 2C:35-7, a felony punishable by more than one year in prison.

h. PRINCE SARNOE was an associate of, among others, ABDULLAH, HUNTER, ELIJAH ABDULLAH, and PROCTOR. SARNOE was an active member of the Abdullah DTO who distributed heroin in or around Trenton and communicated with other co-conspirators in furtherance of the conspiracy.

i. THOMAS ROGERS, a/k/a "Herb," a/k/a "T-Rod," was an associate of, among others, ISHMAEL ABDULLAH, HUNTER, and ELIJAH ABDULLAH. ROGERS participated in the Abdullah DTO's operations by, among other things, obtaining heroin from other co-conspirators and distributing those narcotics to other dealers and end users in and around Trenton.

j. INDIA DANIELS was an associate of, among others, ABDULLAH and HUNTER. DANIELS communicated with ABDULLAH, HUNTER, and TORRES in furtherance of the conspiracy, and agreed to obtain a large quantity of heroin from TORRES on ABDULLAH's behalf while ABDULLAH was detained at the Mercer County Correction Center, and agreed to provide that heroin to HUNTER for distribution.

THE INVESTIGATION

3. Law enforcement's investigation of the Abdullah DTO included the use of court-authorized wiretaps, numerous controlled purchases of heroin from multiple co-conspirators, consensually recorded telephone calls and text messages, physical surveillance, information provided by multiple confidential sources that has proven to be reliable, and other investigative techniques. The investigation has revealed the manner and means by which members of the Abdullah DTO carried out the conspiracy's unlawful heroin trafficking operation. Among other things, members of the Abdullah DTO:

a. obtained quantities of heroin from various sources of supply, including TORRES and SANCHEZ;

b. used various "stash houses" and other locations to store and distribute heroin and other narcotics, and also to store firearms in furtherance of their drug-trafficking activities;

c. distributed heroin and other narcotics to others in and around Trenton; and

d. took affirmative steps to avoid detection by law enforcement, including using prepaid cellular telephones with fictitious or no subscriber information, and speaking in coded language to disguise the illicit nature of their discussions.

I. Controlled Purchases of Heroin from Members of the Abdullah DTO

4. Multiple confidential sources of information (including confidential sources referred to herein as "CS-1" and "CS-2") assisted law enforcement in its investigation of the Abdullah DTO, including by conducting controlled

purchases of heroin from members of the Abdullah DTO. The information and assistance provided during the investigation by CS-1 and CS-2 and other confidential sources of information has been corroborated through other evidence obtained during the investigation, including court-authorized wiretaps, physical surveillance, and consensually recorded calls and meetings.

A. Controlled Purchases of Heroin from ISHMAEL ABDULLAH

5. Between in or around June 2015 and in or around October 2016, law enforcement executed at least 13 controlled purchases of heroin from ABDULLAH. Through these controlled purchases, which were consensually audio-recorded, law enforcement purchased from ABDULLAH over 100 grams of a substance containing heroin. Two of these controlled purchases are described below.

6. In or around October 2015, CS-1, acting at the direction of law enforcement, communicated with ABDULLAH via telephone, and ABDULLAH agreed to sell CS-1 a quantity of heroin. Law enforcement established surveillance at the agreed-upon location for the transaction, and observed ABDULLAH arrive in his vehicle at the agreed-upon time. CS-1 parked his/her vehicle next to ABDULLAH's vehicle, got in the front passenger's seat, and completed the transaction with ABDULLAH. While inside ABDULLAH's vehicle, ABDULLAH said that he would be willing to sell larger quantities of heroin to CS-1 in the future. ABDULLAH also noted that the price of the heroin that he sold to CS-1 was "high right now," but said that "this stuff is very good." CS-1 provided to law enforcement the packages that he/she purchased from ABDULLAH, which contained a substance that field-tested positive for heroin.

7. In or around August 2016, CS-2, acting at the direction of law enforcement, communicated via telephone with ABDULLAH, who used a telephone facility assigned a telephone number ending in 7693 (the "ABDULLAH 7693 Facility") and ABDULLAH agreed to sell CS-2 a quantity of heroin. Law enforcement established surveillance near ABDULLAH's residence, and at the agreed-upon time, observed ABDULLAH exit his residence and walk to his vehicle, which was parked on the street. Law enforcement observed ABDULLAH reach inside the vehicle, and then walk to CS-2's vehicle to complete the transaction. During the transaction, ABDULLAH indicated his willingness to sell a larger quantity of heroin to CS-2 in the future. CS-2 provided to law enforcement the packages that he/she purchased from ABDULLAH, which contained a substance that field-tested positive for heroin.

B. Controlled Purchases of Heroin From PROCTOR

8. Between in or around May 2016 and in or around August 2016, CS-1, acting at the direction of law enforcement, executed four controlled

purchases of heroin from PROCTOR. One of these controlled purchases, which were consensually audio-recorded, is described below.

9. In or around August 2016, CS-1, acting at the direction of law enforcement, communicated via telephone with PROCTOR, who used a telephone facility assigned a telephone number ending in 8527 (the "PROCTOR 8527 Facility"), and PROCTOR agreed to sell a quantity of heroin to CS-1. Thereafter, PROCTOR communicated with HUNTER and another uncharged co-conspirator, each of whom provided a portion of the agreed-upon quantity of heroin that PROCTOR had agreed to sell to CS-1. Law enforcement established surveillance at the agreed-upon location, and observed PROCTOR arrive in his vehicle at the agreed-upon time. PROCTOR exited his vehicle, proceeded to CS-1's vehicle, got in the front passenger's seat, and completed the transaction. CS-1 provided to law enforcement the packages that CS-1 purchased from PROCTOR, which contained a substance that field-tested positive for heroin.

II. Court-Authorized Wiretaps

10. Between in or around July 2016 and in or around December 2016, law enforcement, acting pursuant to wiretap orders entered by the United States District Court for the District of New Jersey, intercepted wire and electronic communications over the following cellular telephone facilities, which were used by ABDULLAH, HUNTER, TORRES, and PROCTOR in furtherance of the conspiracy:

- a. Between in or around September 2016 and in or around December 2016, law enforcement intercepted telephone calls and text messages over the ABDULLAH 7693 Facility, which ABDULLAH used to communicate with his co-conspirators and others in furtherance of the conspiracy.
- b. Between in or around October 2016 and in or around November 2016, law enforcement intercepted telephone calls and text messages occurring over the telephone facility assigned a telephone number ending in 9360 (the "HUNTER 9360 Facility"), which HUNTER used to communicate with his co-conspirators and others in furtherance of the conspiracy.
- c. Between in or around November 2016 and in or around December 2016, law enforcement intercepted telephone calls and text messages over the telephone facility assigned a telephone number ending in 0381 (the "TORRES 0381 Facility") and the telephone facility assigned a number ending in 0326 (the "TORRES 0326 Facility"), which

TORRES used to communicate with his co-conspirators and others in furtherance of the conspiracy.¹

- d. Between in or around August 2016 and in or around September 2016, law enforcement intercepted telephone calls and text messages occurring over the PROCTOR 8527 Facility, which PROCTOR used to communicate with his co-conspirators and others in furtherance of the conspiracy.

11. The telephone calls and text messages intercepted over these facilities further revealed the scope and details of the Abdullah DTO's illegal narcotics trafficking, including the identities of several of its narcotics suppliers and other co-conspirators. Some of the evidence obtained from these court-authorized wiretaps is summarized below.

ABDULLAH and HUNTER

12. On or about September 13, 2016, HUNTER was arrested by local law enforcement officers after the officers observed him exit ABDULLAH's residence carrying a large bag and get in a taxi. Law enforcement conducted a traffic stop of the taxi, and found HUNTER in possession of approximately 40 "bricks" of suspected heroin inside the bag.² The bricks were marked with a "Gucci" stamp, which was identical to the stamp on bricks of heroin that law enforcement previously purchased from ABDULLAH in the controlled purchase in or around August 2016, described in paragraph 7, above. Following HUNTER's arrest (for which he was released on bail days later), law enforcement intercepted numerous communications in which ABDULLAH told others about HUNTER's arrest. For instance, the day after the arrest, ABDULLAH sent a text message from the ABDULLAH 7693 Facility to an unknown individual that read, "My boy got locked up with 50 brick Meech." The same day, ABDULLAH received an incoming call on the ABDULLAH 7693 Facility from an unknown female; during the conversation, ABDULLAH told the female that "my man" had just been "locked up" with "50 bricks."

¹ During the conspiracy, TORRES changed the telephone number assigned to the facility that he used in furtherance of his narcotics trafficking activity from the TORRES 0326 Facility to the TORRES 0381 Facility.

² A "brick" of heroin typically contains approximately 50 smaller, individually packaged glassine envelopes or baggies containing heroin, which are bundled together, wrapped, and taped to form a small package. A brick typically contains a total of approximately one gram of heroin. Bricks, and/or the baggies comprising them, often are identified by dealers and purchasers by an ink "stamp" on the packaging.

13. On or about September 16, 2016, HUNTER made an outgoing call from the HUNTER 9360 Facility to the ABDULLAH 7693 Facility and spoke to ABDULLAH. HUNTER asked, "She said, what's them shits called?" ABDULLAH responded, "Uh, Hot Sauce and Tiffany." HUNTER then asked, "What's the other one?" ABDULLAH answered, "Tiffany." HUNTER responded, "Nah, nah, I heard that one. The other one." ABDULLAH then responded, "Hot Sauce." In the context of this conversation and other conversations intercepted during the investigation, ABDULLAH and HUNTER discussed the stamps—"Hot Sauce" and "Tiffany"—on particular packages of heroin that were available for purchase from a female supplier.

14. On or about September 18, 2016, ABDULLAH made an outgoing call from the ABDULLAH 7693 Facility to a telephone number ending in 2081, which was a telephone facility that GUERVIL used in furtherance of the conspiracy (the "GUERVIL 2081 Facility"). During the conversation, GUERVIL asked ABDULLAH about the "Hot Sauce," and asked if ABDULLAH "still got a pack left." ABDULLAH asked GUERVIL to repeat what he said, and GUERVIL said, "I was with some chick that was looking for some Hot Sauce." ABDULLAH responded, "Oh, oh, oh, motherfucker, I think Meech. He got the joint. . . . He got like six of them left." GUERVIL responded, "I'm about to call him, then." In the context of this conversation and other conversations intercepted during the investigation, GUERVIL asked ABDULLAH where he could obtain a "pack"—meaning a brick of heroin—with a "Hot Sauce" stamp, and ABDULLAH referred him to HUNTER, whom ABDULLAH indicated had a supply of six bricks of heroin bearing that stamp.

15. Additional communications intercepted over the ABDULLAH 7693 Facility and the HUNTER 9360 Facility in furtherance of the conspiracy are described below.

16. On or about November 9, 2016, law enforcement officers conducted a traffic stop of ABDULLAH's vehicle in or around Trenton. ABDULLAH, who was driving the vehicle and was the sole occupant, was found to have open and outstanding warrants, and the officers placed him under arrest and towed the vehicle. Law enforcement obtained a search warrant for the vehicle, and thereafter recovered a nine-millimeter SCCY Industries CPX-2 firearm, bearing serial number 148014, loaded with nine-millimeter ammunition, located in a hidden compartment near the steering column.

TORRES

17. Numerous communications intercepted pursuant to the court-authorized wiretaps have revealed that TORRES, whom ABDULLAH, HUNTER, GUERVIL, and other co-conspirators referred to as "Papi," "Pa," and/or "Pop," was one of the Abdullah DTO's heroin suppliers.

18. The investigation revealed that during the conspiracy, ABDULLAH and GUERVIL amassed a large narcotics debt owed to TORRES. Numerous communications intercepted over the ABDULLAH 7693 Facility concerned ABDULLAH's attempts to pay that debt, and to continue obtaining narcotics from TORRES.

19. On or about September 15, 2016, ABDULLAH received a call on the ABDULLAH 7693 Facility from TORRES, who was using the TORRES 0326 Facility. ABDULLAH told TORRES that "my man" had been "locked up," referring to HUNTER's arrest two days before. ABDULLAH and TORRES then discussed the debt that ABDULLAH owed to TORRES and his associates:

TORRES: Listen, I had a conversation with his people, right. They say that they understand whatchu goin' through. They says you gotta at least try to get 'em at least twenty-one or twenty-two, and leave it like that.

ABDULLAH: That's what I'm trying to do right now.

TORRES: Yeah, they say try to give 'em at least twenty-two or twenty-one and leave it like that, and y'all start over again. That's what they told me.

ABDULLAH: That's what I'm trying to do right, right now. . . . That's what I'm trying to do. You heard me, that's what I'm trying to do. I'm waiting on these fucking people trying to get this car sold and my jewelry and shit. Dude said he gonna call me back he got a buyer for my jewelry. See if I can get maybe like four or five stacks for my watch.

TORRES: How come they can't buy that off of you?

ABDULLAH: For real?

TORRES: I think so.

ABDULLAH: It's a Rolly, I paid ten for it, but I had it on layaway for a minute, it's nice, it got diamonds, it's nice as hell.

TORRES: You got it on you right now?

ABDULLAH: It's at the jewelry store, I could send you, let me see if I got a picture of it in my phone. It's nice, it's got a red face and diamonds in it and everything.

...

TORRES: But it's yours?

ABDULLAH: Yeah, it's mine for sure.

TORRES: Okay, I'm gonna see if they—

ABDULLAH: I'm tellin' you on my kids.

TORRES: I'm gonna call them, if anything, you give them the watch and they bring that down to whatever.

ABDULLAH: Alright, yeah see if they do that, cause that's what I was trying to do get some money so I could flip it, get the fire, and try to turn it into ten, you feel me, and then motherfucker I'm just trying to keep flippin' shit.

Based on the context of this conversation and other conversations intercepted during the investigation, TORRES advised ABDULLAH of a conversation that TORRES had with his associates, who relayed that ABDULLAH needed to pay them at least \$21,000 or \$22,000 of the debt that he owed. ABDULLAH acknowledged the debt to TORRES, and indicated that he was trying to sell his car and Rolex watch for \$4,000 or \$5,000. TORRES suggested that he would speak to his associates to see if ABDULLAH could give them the watch directly in exchange for reducing the outstanding debt. ABDULLAH indicated to TORRES that he also wanted to obtain and sell more heroin (which ABDULLAH referred to as "fire") to work down the amount he owed to TORRES.

20. Approximately six minutes after the call described in paragraph 19, above, ABDULLAH received another incoming call from TORRES. TORRES indicated that he had spoken with his associates about ABDULLAH giving them his watch to pay down his debt:

TORRES: They told me that they was trying to get you up, they was trying to work, like we ain't trying to buy no jewelry or nothing, we just trying to work. But I looked you out, I told 'em to take it.

ABDULLAH: Thank you, bro, I appreciate that bro, because I was, really I told you I was trying to sell that and the car and everything bro, I'm like trying to sell everything to pay you guys.

TORRES: I know, we was talking last night. He told me, he was like, "Look, I understand that everybody goes through

wrong times and stuff like that, tell him to just give me the twenty-two and we could rest like that.” And then I called him [about the] watch, and I was like, “Yo, he got a good watch, [it] is a Rolly, is worth like ten, fifteen stacks.” He was like, “Yo, tell him I’ll give him six for it, that’s it, to help him out so he can start over then all I want him to do is start workin.”

In the context of this and other communications intercepted during the investigation, TORRES related to ABDULLAH a conversation that TORRES had with his associate, during which TORRES convinced the associate to accept ABDULLAH’s Rolex watch in partial payment for ABDULLAH’s outstanding debt. TORRES also indicated that he and his associates were willing to continue to supply narcotics to ABDULLAH.

21. Shortly after the two calls between ABDULLAH and TORRES described in paragraphs 19 and 20, above, ABDULLAH made an outgoing call from the ABDULLAH 7693 Facility to the HUNTER 9360 Facility, and spoke to HUNTER. ABDULLAH relayed the arrangement that he had just made with TORRES: “I just talked to Pa, Pa gonna, they, they worked a deal out for me.” ABDULLAH then told HUNTER that TORRES (and TORRES’s associates) would accept ABDULLAH’s Rolex watch as partial payment for the drug debt, and that “they want to still fuck with me.” ABDULLAH also said, “You feel me, so he basically like, ‘Just give me the Rolly, and I’m gonna knock it down to like fourteen, fifteen,’ like he said they gonna knock it down fourteen, fifteen. That’s good though, right, bitch?” HUNTER responded, “Yeah.” In context, ABDULLAH indicated to HUNTER that TORRES and his associates were willing to continue to supply heroin to ABDULLAH, and would accept ABDULLAH’s Rolex watch in partial payment for the debt.

22. On or about October 5, 2016, law enforcement intercepted a series of telephone calls between ABDULLAH and TORRES indicating that ABDULLAH intended to pick up his Rolex watch from a Philadelphia jeweler and bring it to TORRES to partially repay his outstanding drug debt, as they had discussed. Based on these communications, law enforcement conducted physical surveillance and observed ABDULLAH arrive at the jewelry store—in a red pickup truck in which HUNTER and ROGERS also were riding—and thereafter meet with TORRES and his associate inside TORRES’s vehicle in a casino parking lot. Subsequent communications intercepted over the ABDULLAH 7693 Facility confirmed that ABDULLAH had, in fact, provided his watch to TORRES.

23. On or about October 13, 2016, ABDULLAH received a text message from TORRES on the TORRES 0326 Facility that read, “Yo pa.” Shortly thereafter, ABDULLAH made an outgoing call from the ABDULLAH 7693 Facility to the TORRES 0326 Facility, and spoke to TORRES. TORRES said,

"I'm about to go see you, I'm going to call you when I'm on the way." Thereafter, TORRES called ABDULLAH on the ABDULLAH 7693 Facility and said, "I'll be there in like seven minutes, Pop." ABDULLAH then called the HUNTER 9360 Facility and told HUNTER, "I got something I want to give you so your people taste it and shit. To see how the food taste." Less than one minute after that call ended, TORRES again called ABDULLAH and said, "I'm right here, Pop." Law enforcement conducting physical surveillance in the area of ABDULLAH's residence observed ABDULLAH exit his residence, walk to a vehicle parked on the street, and then return to his residence carrying an object under his arm. Based on the above communications and other communications intercepted during the investigation, TORRES brought a quantity of heroin for ABDULLAH to distribute. ABDULLAH advised HUNTER of the heroin that TORRES had brought him, which ABDULLAH referred to in code as "food."

24. On or about October 17, 2016, ABDULLAH sent an outgoing text message from the ABDULLAH 7693 Facility to the HUNTER 9360 Facility that read, "Pa pi bout to bring me some thing to try." Shortly thereafter, HUNTER responded with a text message that read, "Ard [alright] bet." Based on these text message conversations and other communications intercepted during the investigation, ABDULLAH indicated to HUNTER that TORRES was about to bring a quantity of heroin for ABDULLAH to distribute for profit.

25. On or about November 3, 2016, ABDULLAH exchanged a series of text messages with an unknown male, during which ABDULLAH demanded payment from the individual. ABDULLAH indicated that he needed the money because he was "fucked up too cause of shit I gave out," and said that he "still got mad shit I gotta pay to bro on da real." ABDULLAH also sent text messages to the individual that read: "I owe my plug 30000 bro cause of the money niggaz owe me and he on my ass I gotta awnser [sic] for dat," and "I got niggaz on my ass and I be having to pay ou[t] of my pocket." Based on these text messages and other communications intercepted during the investigation, ABDULLAH demanded payment from the individual for narcotics ABDULLAH had "fronted" to that individual, because he needed the money to repay TORRES.

26. On or about November 6, 2016, ABDULLAH called the TORRES 0326 Facility and spoke to TORRES. During the conversation, ABDULLAH and TORRES attempted to find each other. ABDULLAH said that he was outside a particular convenience store, and TORRES said, "Alright, I'm gonna pull up so you can just get in." Shortly thereafter, ABDULLAH called the HUNTER 9360 Facility and spoke to HUNTER. ABDULLAH told HUNTER, among other things, "I got the shit," "I got the shit from Pop," and "I'll just give it to you tomorrow." Based on these conversations and other communications intercepted during the investigation, TORRES met ABDULLAH outside a convenience store and supplied ABDULLAH with a quantity of heroin, and ABDULLAH then advised

HUNTER that he had received the supply of heroin from TORRES, and would provide the supply to HUNTER the next day.

27. Additional intercepted communications concerning TORRES that were in furtherance of the conspiracy are described below.

SANCHEZ

28. The investigation revealed that SANCHEZ was one of TORRES's associates and also supplied heroin to the Abdullah DTO.

29. On or about October 19, 2016, ABDULLAH received an incoming call from SANCHEZ, who used a telephone facility assigned a telephone number ending in 9711 (the "SANCHEZ 9711 Facility"). SANCHEZ told ABDULLAH that she was on her way, and was walking toward ABDULLAH's residence. Shortly thereafter, ABDULLAH sent a text message to GUERVIL on the GUERVIL 2081 Facility that read, "I think she bout to bring some u wanted some." Based on these communications and other communications intercepted during the investigation, SANCHEZ brought to ABDULLAH's residence a quantity of heroin, and ABDULLAH contacted GUERVIL to see if he wanted to purchase a portion of that supply to sell for profit.

30. On or about October 24, 2016, ABDULLAH and HUNTER exchanged the following pertinent text messages that, in context, concerned TORRES, SANCHEZ, ELIJAH ABDULLAH, and heroin that SANCHEZ supplied to the Abdullah DTO:

Sender	Recipient	Message
ABDULLAH 7693 Facility	HUNTER 9360 Facility	Shit still slow this bitch on my ass I'm gone show u these messages
HUNTER 9360 Facility	ABDULLAH 7693 Facility	Yeah shit dry ass hell
ABDULLAH 7693 Facility	HUNTER 9360 Facility	I really hate this ma mi yo
HUNTER 9360 Facility	ABDULLAH 7693 Facility	Wyd
ABDULLAH 7693 Facility	HUNTER 9360 Facility	I hope pop start fucking back wit me heavy she really hit me every day on my ass
ABDULLAH 7693 Facility	HUNTER 9360 Facility	Crib bout to come out probly
HUNTER 9360 Facility	ABDULLAH 7693 Facility	She wildin that shit type ass

Sender	Recipient	Message
ABDULLAH 7693 Facility	HUNTER 9360 Facility	She really want me to pay her for the 50 Pokémon I got from her is that good
HUNTER 9360 Facility	ABDULLAH 7693 Facility	Not really
ABDULLAH 7693 Facility	HUNTER 9360 Facility	Uncle e talking bout its fire
ABDULLAH 7693 Facility	HUNTER 9360 Facility	I'm bout to hit papi and see what's up man
ABDULLAH 7693 Facility	HUNTER 9360 Facility	Cause this bitch bms
HUNTER 9360 Facility	ABDULLAH 7693 Facility	My traps really don't like it as much

Thereafter, ABDULLAH made three outgoing calls from the ABDULLAH 7693 Facility to the TORRES 0326 Facility, but TORRES did not answer. In the context of the foregoing communications and other communications intercepted during the investigation, ABDULLAH complained to HUNTER that SANCHEZ was insisting that ABDULLAH pay her for 50 bricks of heroin bearing a "Pokémon" stamp that she supplied him. In turn, ABDULLAH asked HUNTER about the quality or popularity of that heroin, because ELIJAH ABDULLAH previously had indicated that it was good quality and/or popular with customers ("fire"). HUNTER expressed his opinion that his customers (whom HUNTER referred to as his "traps") did not like, or were having difficulty re-selling, packages of heroin bearing the "Pokémon" stamp. ABDULLAH then indicated that he hoped that TORRES would soon resume supplying him large quantities of heroin directly, and that he would call TORRES to discuss that issue.

31. On or about October 27, 2016, ABDULLAH received a call on the ABDULLAH 7693 Facility from the SANCHEZ 9711 Facility, and spoke to SANCHEZ. SANCHEZ asked ABDULLAH, "You don't think you could put one together, one stack? I could put the little money together and they can come bring more." ABDULLAH responded, "What you said, put what together?" SANCHEZ answered, "At least one stack." ABDULLAH then said, "Um, I'm tryin' to put one stack together." SANCHEZ then said, "Alright, well, if you could, you don't think you could do it by tonight? They gonna come in a little while, so." Abdullah responded unintelligibly, which prompted SANCHEZ to say, "Oh, so then I guess that'll be a no." SANCHEZ also told ABDULLAH that "they were trying to come but I have to get some, they told me to get a number together and I'm a stack short that's why I was saying, I don't want them to come and then you know and then I don't got it and then it's like I'm trying to

play games and shit." ABDULLAH responded, "Oh, shit, let me, uh, let me, let me, let me see [unintelligible] how I can bust a move or two." SANCHEZ said "Alright." In the context of this conversation and other conversations intercepted during the investigation, SANCHEZ asked ABDULLAH to pay her at least \$1,000 ("at least one stack") that she could give to her supplier so that she could obtain additional quantities of heroin to distribute, and ABDULLAH responded that he would try to collect the money to pay SANCHEZ as she had requested.

32. On or about November 4, 2016, ABDULLAH received a call on the ABDULLAH 7693 Facility from the TORRES 0326 Facility, and spoke with TORRES for approximately 24 minutes. During the conversation, ABDULLAH and TORRES discussed, among other things, SANCHEZ. TORRES told ABDULLAH that SANCHEZ claimed that ABDULLAH owed SANCHEZ money for heroin she sold him. ABDULLAH objected, saying, "You know I don't owe her no goddamn money, bitch, I'm moving the goddamn bricks, I don't owe her money, though. What you mean owe her money, what type of money?" TORRES said that SANCHEZ had told him that ABDULLAH "owe her three stacks [\$3,000] and that she gave you something and you haven't paid her back, that you paid her back but you owe her three stacks more and that all of your people left you and you not gonna be having the movement you had, and a bunch of shit. Then she's telling me to take her something, that she give it to somebody else, all this bullshit." Additionally, ABDULLAH told TORRES about an earlier occasion when SANCHEZ had supplied ABDULLAH with 100 bricks of heroin: "[T]he first shit I got from her, she gave me a hundred and I paid her that in like five days for the shit she gave me, and it wasn't even good shit. I paid her in five days then she gave me something else."

33. During the foregoing conversation, TORRES also indicated that SANCHEZ had claimed that she was supplying heroin directly to ABDULLAH's "right-hand man," whom TORRES referred to as "BG." TORRES advised ABDULLAH that SANCHEZ had said, "I got his right-hand man." TORRES then asked ABDULLAH, "Your right-hand man's name is BG, right?" ABDULLAH responded, "Mm-hmm." As noted in paragraph 2(e), above, "BG" is GUERVIL's alias.

34. At the end of the call, TORRES made clear to ABDULLAH that, regardless of the issue they were having with SANCHEZ, TORRES's loyalty lay with ABDULLAH: "At the end of the day, I always told you, I'm always gonna be loyal no matter what, if we gonna be broke, we gonna be broke together, if we gonna be rich, we gonna be rich together."

35. Additional intercepted communications concerning SANCHEZ that were in furtherance of the conspiracy are described below.

GUERVIL

36. Communications intercepted during the court-authorized wiretaps—in addition to the communications that already have been described—revealed that GUERVIL was a key confidant of ABDULLAH and member of the Abdullah DTO. Indeed, as noted in paragraph 33, above, ABDULLAH responded affirmatively when TORRES asked if his “right-hand man” was “BG,” which is GUERVIL’s alias.

37. On or about September 15, 2016, ABDULLAH made an outgoing call from the ABDULLAH 7693 Facility to the GUERVIL 2081 Facility and spoke to GUERVIL:

ABDULLAH: So this ain’t even double or nothing?

GUERVIL: Nah.

ABDULLAH: It’s hot. Them other niggas shit be, too?

GUERVIL: Yeah.

ABDULLAH: And he said everything be right?

GUERVIL: Yeah.

...

GUERVIL: She gave the whole thing, though. You owe four.

ABDULLAH: Alright.

In the context of this and other conversations intercepted during the investigation, ABDULLAH and GUERVIL discussed the type of packaging of a particular supply of heroin (“double”) that had been received, and ABDULLAH indicated that the supply was popular (“it’s hot”). They then discussed an additional supply of narcotics that was on its way from another supplier, and how much ABDULLAH owed for it.

38. Two minutes after the call described in paragraph 37, above, ABDULLAH and GUERVIL exchanged the following text messages:

Sender	Recipient	Message
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	U got ten right

Sender	Recipient	Message
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	Yea
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	Bet
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	Don't do no fronts we can't afford it
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	Niggas Neva pay

In the context of this and other communications intercepted during the investigation, ABDULLAH and GUERVIL discussed the supply of narcotics, and ABDULLAH instructed GUERVIL not to "front" the narcotics to other dealers; that is, advance the narcotics with the expectation of payment after the narcotics were sold by the purchaser. Rather, ABDULLAH instructed GUERVIL only to accept immediate payment for the heroin.

39. Later that day, ABDULLAH made an outgoing call from the ABDULLAH 7693 Facility to the GUERVIL 2081 Facility and spoke to GUERVIL. ABDULLAH made this call immediately after speaking with HUNTER about the payment arrangement he had worked out with TORRES regarding his drug debt, as described in paragraph 21, above. During the call, ABDULLAH conveyed to GUERVIL the same information that he had conveyed to HUNTER. Specifically, ABDULLAH explained that "I'm about to give Papi and them my Rolly, they gonna take seven racks off for the Rolly." ABDULLAH then asked, that's good, right, bitch?" GUERVIL responded, "Hell yeah." In the context of this and other conversations intercepted during the investigation, ABDULLAH explained to GUERVIL that TORRES understood ABDULLAH's situation, that he was willing to work with him over his drug debt, and that TORRES was willing to continue to supply ABDULLAH with narcotics.

40. On or about September 18, 2016, ABDULLAH and GUERVIL exchanged the following text messages:

Sender	Recipient	Message
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	How u lookin
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	I just gave her 4 we owed n asked to trade tif cuz they ain't liking tiff but ight

Sender	Recipient	Message
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	Give me da Tiffany they said it's fire
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	I already gave it to her ... smh that's what I should of did
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	I told u it was fire last night
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	I showed u da message
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	How much Tiffany was it
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	That u traded
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	Yea I know but they ain't really liken it out here so I got the other shit. 5 only had ten of em

In the context of these text messages and other conversations intercepted during the investigation, ABDULLAH and GUERVIL discussed money that GUERVIL had paid to SANCHEZ, as well as the stamps ("Tiffany") on particular packages of heroin that the Abdullah DTO was distributing at that time. ABDULLAH indicated the "Tiffany" stamps were popular with the Abdullah DTO's customers.

41. On or about October 23, 2016, ABDULLAH and GUERVIL exchanged the following text messages regarding the drug debt owed to TORRES. These text messages confirmed that (i) ABDULLAH had given TORRES his Rolex watch as partial repayment of the debt; and (ii) that the debt was owed to TORRES jointly by ABDULLAH and GUERVIL:

Sender	Recipient	Message
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	Yoo bro been meaning to get at u I just been fucked up in my head Mad shit on my mind ... N u know I had my daughter Happy as hell she here but it w

Sender	Recipient	Message
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	as kinda bad timing I ain't had a dollar to my name Had to borrow some bread from Gs I ain't forget we owe pop I just had an interview with Amazon Imm
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	a help u out I still been doing a lil too Smh just tryna get myself together n my head back right Havi that baby made it real
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	I gave. Him the Rolex and he took 7000 off
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	But u good bro I already now I been on it tryna make it happen it hard doe nobody to sever she is a blessing bro just like u I swear
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	O ight Hopefully I get this job my traps back N myself together N I got u ... Word as bond Shit deep right now But ight I just ain't want u to think I
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	was on know funny Shit
ABDULLAH 7693 Facility	GUERVIL 2081 Facility	I already know bro I'm super fucked up doe I don't even be having bread to eat yo but u kno how we do we will be back
GUERVIL 2081 Facility	ABDULLAH 7693 Facility	Word as bond if not this week by the end of next week I'll try to give u like \$500 towards pop debt ... I'm trying to get Shit back flowing

In the context of these messages and other conversations intercepted during the investigation, GUERVIL (i) let ABDULLAH know about his status in the Abdullah DTO, (ii) made sure that ABDULLAH did not think that GUERVIL was acting suspiciously, (iii) indicated that he had not forgotten about the debt that they owed to TORRES, and (iv) indicated that he intended to help ABDULLAH repay the debt in the near future once he increased his narcotics distribution activity. ABDULLAH, in response, told GUERVIL that he had given TORRES his Rolex watch and that TORRES had reduced the outstanding debt by \$7,000.

42. On or about October 4, 2016, immediately after the 24-minute conversation between TORRES and ABDULLAH described in paragraph 32, above, ABDULLAH sent a text message to the GUERVIL 2081 Facility complaining about SANCHEZ: "U good bro u don't gotta hit me papi just told me how mami be coming don't trust dat bitch." GUERVIL responded with a text message that read, "Yeah, she b real thirsty ... n nah I got u bro Imma hit u even if it take months I know what we had owed Imma get half of that to u." In the context of these messages and other communications intercepted during the investigation, ABDULLAH indicated that he did not trust SANCHEZ, and GUERVIL reaffirmed his intent to help ABDULLAH repay the narcotics debt owed to TORRES.

ELIJAH ABDULLAH

43. The investigation, including communications intercepted pursuant to the court-authorized wiretaps, revealed that ELIJAH ABDULLAH was a member of the Abdullah DTO and participated in the conspiracy by, among other things, distributing heroin in and around Trenton, and communicating with ISHMAEL ABDULLAH, HUNTER, PROCTOR, SARNOE, and others in furtherance of the Abdullah DTO's unlawful heroin trafficking.

44. For example, on or about September 15, 2016, ISHMAEL ABDULLAH called ELIJAH ABDULLAH on a telephone facility assigned a telephone number ending in 1960 (the "ELIJAH ABDULLAH 1960 Facility"), which ELIJAH ABDULLAH used to communicate in furtherance of the conspiracy. During the conversation, ISHMAEL ABDULLAH said, "Let me know something." ELIJAH ABDULLAH responded, "Bitch, I got like three bricks." ISHMAEL ABDULLAH and ELIJAH ABDULLAH then discussed meeting, and ISHMAEL ABDULLAH said, "Aight, I'm about to come scoop you." In the context of this and other communications intercepted during the investigation, ISHMAEL ABDULLAH and ELIJAH ABDULLAH discussed the ongoing status of heroin distribution, and ELIJAH ABDULLAH indicated that he had a supply of three bricks of heroin at that time.

45. On or about September 17, 2016, ISHMAEL ABDULLAH sent a text message to ELIJAH ABDULLAH that read, "Meech said he gone sell u some." ELIJAH ABDULLAH responded with a text message that read, "ard," meaning "alright." In the context of this and other conversations intercepted during the investigation, ISHMAEL ABDULLAH told ELIJAH ABDULLAH that HUNTER would sell him a quantity of heroin that ELIJAH ABDULLAH could then resell for profit.

46. On or about October 18, 2016, ISHMAEL ABDULLAH received an incoming call from the ELIJAH ABDULLAH 1960 Facility, and spoke to ELIJAH ABDULLAH. ISHMAEL ABDULLAH said, "Somebody has some shit to bring

you,” and advised that “She is on Spring right now.” Eight minutes later, ELIJAH ABDULLAH called ISHMAEL ABDULLAH and asked, “Where she at?” ISHMAEL ABDULLAH responded, “She out there waiting for you.” ISHMAEL ABDULLAH also said, “the mami right by the store, she in the Benz or a little truck or something.” In the context of this conversation and other conversations intercepted during the investigation, ISHMAEL ABDULLAH directed ELIJAH ABDULLAH to meet with SANCHEZ, who drove a Mercedes Benz registered in her name, in order to obtain a quantity of heroin from her. Two minutes after the call ended, ELIJAH ABDULLAH called ISHMAEL ABDULLAH and indicated that he was still looking for the female. Ultimately, ELIJAH ABDULLAH sent a text message to ISHMAEL ABDULLAH that read, “I got it.”

47. One minute after receiving confirmation from ELIJAH ABDULLAH that he “got it,” ISHMAEL ABDULLAH received an incoming call on the ABDULLAH 7693 Facility from the SANCHEZ 9711 Facility, and spoke to SANCHEZ. SANCHEZ said, among other things, “as soon as they get back to you, they need their answer.” Immediately after the call ended, ISHMAEL ABDULLAH sent a text message to ELIJAH ABDULLAH that read, “Let me kno asap.” Based on these conversations and other communications intercepted during the investigation, ISHMAEL ABDULLAH directed ELIJAH ABDULLAH to meet SANCHEZ to pick up a supply of narcotics, and ELIJAH ABDULLAH confirmed that he did. SANCHEZ then told ISHMAEL ABDULLAH to let her know whether the narcotics were of high quality. ISHMAEL ABDULLAH, in turn, directed ELIJAH ABDULLAH to let him know that information as soon as possible.

PROCTOR

48. Communications intercepted over the PROCTOR 8527 Facility revealed that PROCTOR participated in the Abdullah DTO by distributing heroin to other narcotics dealers and end users in and around Trenton. PROCTOR used the PROCTOR 8527 Facility to communicate with his customers, and also to communicate with his co-conspirators in furtherance of the conspiracy.

49. For example, as described in paragraph 9, above, in or around August 2015, CS-1, acting at the direction of law enforcement, executed a controlled purchase of multiple bricks of suspected heroin from PROCTOR. After PROCTOR and CS-1 agreed on the price and quantity of heroin, PROCTOR made an outgoing call using the PROCTOR 8527 Facility to an uncharged co-conspirator. PROCTOR told the co-conspirator the number of “packs”—meaning bricks—that he needed. The co-conspirator responded that he would be able to provide half of the amount that PROCTOR needed, and told PROCTOR to get the remainder from elsewhere. PROCTOR indicated that he would call “Broski.” Two minutes after that call ended, PROCTOR made an

outgoing call from the PROCTOR 8527 Facility to the HUNTER 9360 Facility and asked HUNTER for the remaining “packs” that he needed to complete the transaction with CS-1. HUNTER agreed to provide PROCTOR with the bricks of heroin that he needed, and PROCTOR said, “I need it soon.” Thereafter, CS-1 completed the controlled purchase of suspected heroin from PROCTOR as described in paragraph 9, above.

50. On or about August 5, 2016, another uncharged co-conspirator called the PROCTOR 8527 Facility and spoke to PROCTOR. PROCTOR told the individual, “Yo, give, um, Meech two bundles for me.”³ The individual asked, “Where they at,” and PROCTOR responded, “They downstairs in my, um, my um, pocket.” PROCTOR told the individual that “Meech” was “on the porch,” and instructed the individual to “get the money, too.” In the context of this conversation and other conversations intercepted during the investigation, PROCTOR instructed the individual to provide HUNTER two bundles of heroin, and to obtain money from HUNTER in return.

51. On or about August 21, 2016, PROCTOR received an incoming call on the PROCTOR 8527 Facility from an unknown male seeking to purchase heroin. PROCTOR indicated that he did not have any “D”—slang for heroin—to sell to him at that time, but noted that “Ish got that Gucci shit around the corner.” Two days later, on or about August 23, 2016, PROCTOR received text messages on the PROCTOR 8527 Facility from an unknown individual that, in sum and substance, asked whether PROCTOR had any heroin available for sale, and if so, what stamp PROCTOR was selling. PROCTOR responded with a text message that read: “Gucci.” As noted in paragraph 12, above: (i) on or about September 13, 2016, HUNTER was arrested in possession of approximately 40 bricks of heroin bearing a “Gucci” stamp after leaving ABDULLAH’s residence; and (ii) in or around August 2016, law enforcement purchased from ABDULLAH, in a controlled purchase, multiple bricks of heroin bearing a “Gucci” stamp.

52. On or about August 23, 2016, based on communications intercepted over the PROCTOR 8527 Facility, law enforcement officers approached PROCTOR on the street in or around Trenton. As they approached him, the officers observed PROCTOR remove a firearm from his waistband and discard it. The officers arrested PROCTOR and recovered from PROCTOR’s person multiple rounds of hollow-point ammunition. Following the arrest, the officers recovered a .40 caliber Glock 27 firearm, bearing serial number WKU950, loaded with .40 caliber hollow-point ammunition, on the ground in the area in which they had observed PROCTOR discard it.

³ A “bundle” typically is comprised of ten baggies of heroin. There are typically five “bundles” in one brick of heroin.

SARNOE

53. Communications intercepted over the ABDULLAH 7693 Facility, the HUNTER 9360 Facility, and the PROCTOR 8527 Facility revealed that SARNOE was a member of the Abdullah DTO and, in furtherance of the conspiracy, distributed heroin to other narcotics dealers and end users in and around Trenton. SARNOE used a telephone facility assigned a telephone number ending in 3193 (the "SARNOE 3193 Facility") to communicate with his co-conspirators and others in furtherance of the conspiracy.

54. On or about September 28, 2016, ABDULLAH made an outgoing call from the ABDULLAH 7693 Facility to the SARNOE 3193 Facility, and spoke to SARNOE. During the conversation, SARNOE informed ABDULLAH, "Meech went and got fire last night." ABDULLAH responded, "Yeah, I know, I was talking to him. I talked to him 'til about seven o'clock this a.m., man." SARNOE responded, "Yeah, but this is, is a hit. I ain't even gonna lie." In the context of this conversation and other conversations intercepted during the investigation, SARNOE and ABDULLAH discussed a supply of heroin—which SARNOE referred to as "fire"—that HUNTER had obtained the previous evening, and noted that the heroin was popular with customers.

55. On or about October 6, 2016, ABDULLAH sent a text message from the ABDULLAH 7693 Facility to the SARNOE 3193 Facility that read, "What it look like." SARNOE responded with a text message that read, "Slow motion but it's moving." In the context of this conversation and other conversations intercepted during the investigation, SARNOE informed ABDULLAH that their existing supply of narcotics was selling slowly. ABDULLAH and SARNOE then exchanged additional text messages concerning a particular supplier of narcotics, from whom SARNOE indicated they could "get it cheap."

56. On or about October 12, 2016, ABDULLAH and SARNOE exchanged a series of text messages that included the following messages:

Sender	Recipient	Message
SARNOE 7693 Facility	ABDULLAH 7693 Facility	Tomorrow i should have a stack so u can hit shorty
ABDULLAH 7693 Facility	SARNOE 7693 Facility	Bet
ABDULLAH 7693 Facility	SARNOE 7693 Facility	I gone give u da rest of dem bitches when I see u then we can bust all da profit in half
SARNOE 7693 Facility	ABDULLAH 7693 Facility	Ite let me finish this then ima do that over too

Sender	Recipient	Message
ABDULLAH 7693 Facility	SARNOE 7693 Facility	Bet

In the context of this conversation and other conversations intercepted during the investigation, ABDULLAH and SARNOE discussed a payment of approximately \$1,000 that SARNOE would give to ABDULLAH the next day. ABDULLAH further indicated that he would give SARNOE additional narcotics to sell, for which ABDULLAH and SARNOE could split the profits.

57. On or about October 15, 2016, ABDULLAH and SARNOE exchanged the following text messages:

Sender	Recipient	Message
ABDULLAH 7693 Facility	SARNOE 7693 Facility	Yo bro
SARNOE 7693 Facility	ABDULLAH 7693 Facility	You can come now
ABDULLAH 7693 Facility	SARNOE 7693 Facility	After u give me 5 more beans to clear dat we can spit [sic] da bread we make off da rest we got
SARNOE 7693 Facility	ABDULLAH 7693 Facility	I already kno
ABDULLAH 7693 Facility	SARNOE 7693 Facility	I might got more than what I said I need a scale

In the context of this conversation and other conversations intercepted during the investigation, ABDULLAH advised SARNOE that as soon as SARNOE gave him money for narcotics that had been supplied, they could split the profit on the additional narcotics in their possession.

58. On or about October 20, 2016, HUNTER made an outgoing call from the HUNTER 9360 Facility to the SARNOE 3193 Facility and spoke to SARNOE. During the conversation, HUNTER said, "That shit fire, though." SARNOE asked, "What?", and HUNTER responded, "That shit you got." In the context of this conversation and other conversations intercepted during the investigation, HUNTER told SARNOE that the narcotics that SARNOE was distributing was of high quality.

ROGERS

59. Communications intercepted over the HUNTER 9360 Facility revealed that ROGERS participated in the Abdullah DTO by distributing heroin to other narcotics dealers and end users in and around Trenton. ROGERS used a telephone facility assigned a telephone number ending in 5408 (the "ROGERS 5408 Facility"), to communicate with his co-conspirators and others in furtherance of the conspiracy.

60. On or about October 14, 2016, HUNTER received an incoming call on the HUNTER 9360 Facility from the ROGERS 5408 Facility, and spoke to ROGERS regarding packages of heroin bearing a particular stamp:

ROGERS: Yo, you were saying they, the old ones [unintelligible]?

HUNTER: Yeah, tell her that, um—

ROGERS: But he want Black Scorp, though.

HUNTER: Alright, I think I'm, like, one Black Scorpion left. Tell her to go get it from [unintelligible].

ROGERS: Alright.

HUNTER: Alright.

In the context of this conversation and other conversations intercepted during the investigation, ROGERS and HUNTER discussed one or more individuals who wanted to purchase packages of heroin bearing the stamp "Black Scorpion." On at least four occasions between in or around August 2015 and in or around January 2016, law enforcement executed controlled purchases of heroin from ISHMAEL ABDULLAH that included packages of heroin bearing a "Black Scorpion" stamp. Moreover, on or about January 22, 2016, ELIJAH ABDULLAH was arrested by local law enforcement officers in possession of packages of heroin bearing a "Black Scorpion" stamp.

61. On or about October 17, 2016, HUNTER received an incoming call on the HUNTER 9360 Facility from the ROGERS 5408 Facility, and spoke to ROGERS. ROGERS informed HUNTER of a recent encounter with a local law enforcement officer in or around the Kingsbury section of Trenton. ROGERS recounted what the officer told him: "He said, 'don't be bringing those chops in here,' he say, 'Your name in everything.' Swear to God on my mom, word is life he said that. He say, 'Your name in everything, Mr. Rogers, everything.'" ROGERS continued, repeating what the officer told him: "Yeah, he said, 'Mr. Rogers, you're in everything. Don't be bringing no guns, no drugs, nothing, down [to] Kingsbury. We don't need that shit.'" In response, HUNTER

warned ROGERS, "Alright, you gotta watch it. That means you gotta start moving different, brother."

62. The investigation also has revealed that HUNTER and ROGERS regularly supplied another individual with heroin in exchange for the use of the individual's red pickup truck—the same pickup truck that ABDULLAH, HUNTER, and ROGERS were driving on or about October 5, 2016 when ABDULLAH met with TORRES to provide TORRES his Rolex watch as partial repayment of his narcotics debt, as described in paragraph 22, above. For instance, on or about October 18, 2016, HUNTER spoke to the individual over the HUNTER 9360 Facility. During the conversation, the individual was complaining about how "Tom"—i.e., ROGERS—was treating him with respect to narcotics that ROGERS had supplied. HUNTER said, "Me and Tom gonna ride up together" to see the individual to address the situation. HUNTER also said that he would begin bringing heroin to the individual directly, rather than have ROGERS do so: "I'ma start doing it more, you heard me? Cause everything really go through me." The individual responded, "I knew that, I'm not dumb. I knew that you are the main supplier and the one paying for everything and he just brings the car back and forth. I know that."

DANIELS

63. Communications intercepted over the HUNTER 9360 Facility revealed that in furtherance of the conspiracy, DANIELS agreed with ABDULLAH, HUNTER, and TORRES to obtain (on ABDULLAH's behalf) a large supply of heroin from TORRES, and to provide it to HUNTER for re-distribution for profit.

64. As noted in paragraph 16, above, on or about November 9, 2016, law enforcement officers arrested ABDULLAH for open and outstanding warrants, and ABDULLAH remained detained at the Mercer County Correction Center until or on or about November 22, 2016. While ABDULLAH was detained, law enforcement intercepted multiple telephone calls that ABDULLAH made from the jail to the HUNTER 9360 Facility. During several of these calls, HUNTER conferenced DANIELS in via three-way call, and ABDULLAH, HUNTER, and DANIELS discussed obtaining a supply of heroin from TORRES while ABDULLAH remained detained at the jail.

65. For example, during multiple calls, ABDULLAH directed DANIELS to go to his residence so that she could locate TORRES's contact information. DANIELS eventually did locate TORRES's contact information. During a three-way call between ABDULLAH, HUNTER, and DANIELS, DANIELS conferenced in TORRES, and the foursome discussed and agreed that DANIELS would pick up a supply of 50 bricks of heroin from TORRES. After TORRES dropped off the call, ABDULLAH explained to DANIELS the price of the heroin to be purchased from TORRES: \$2,500 for a "dub," meaning 20 bricks of heroin;

and \$1,250 for ten bricks of heroin. ABDULLAH explained to DANIELS that she would obtain the heroin from TORRES, and would provide it to HUNTER. ABDULLAH further explained that HUNTER would coordinate the sale of the heroin, and would then provide money to DANIELS that she would then give to TORRES as payment. ABDULLAH also told DANIELS, in sum and substance, that she would not be responsible for selling the heroin once she obtained it from TORRES, but that HUNTER would do so. ABDULLAH also told DANIELS that she could trust TORRES.

66. During another call on or about November 11, 2016, DANIELS informed ABDULLAH and HUNTER that she would be meeting TORRES the following day to obtain the supply of heroin. Subsequent communications between TORRES, DANIELS, and ABDULLAH intercepted over the TORRES 0381 Facility revealed that TORRES had provided DANIELS 30 bricks of heroin rather than 50 bricks as previously agreed.

67. Thereafter, communications intercepted over the TORRES 0381 Facility between on or about November 14, 2016 and on or about November 16, 2016 revealed that TORRES agreed with ABDULLAH and DANIELS to provide an additional 70 bricks of heroin to DANIELS. Based on these intercepted communications, on or about November 16, 2016, law enforcement established surveillance in the parking lot of a mall located in or around Langhorne, Pennsylvania, and observed a meeting between TORRES and DANIELS, during which TORRES provided DANIELS with the agreed-upon 70 bricks of heroin. DANIELS then drove directly from the meeting with TORRES to ABDULLAH's residence in or around Trenton, and went inside.