

18 MAG . 4802

Approved: *[Signature]*

MICHAEL K. KROUSE, STEPHANIE L. LAKE, ROBERT B. SOBELMAN  
Assistant United States Attorney

Before: HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York

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	:	<u>COMPLAINT</u>
UNITED STATES OF AMERICA	:	
	:	Violation of
- v. -	:	21 U.S.C. § 846
	:	
TIA JASPER,	:	COUNTY OF OFFENSE:
	:	BRONX
Defendant.	:	
	:	

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SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY SNEAD, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, and charges as follows:

COUNT ONE

1. On or about May 9, 2018, in the Southern District of New York and elsewhere, TIA JASPER, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was part and an object of the conspiracy that TIA JASPER, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that TIA JASPER, the defendant, conspired to distribute and possess with intent to distribute were (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl; and (ii) one kilogram and more of mixtures and substances containing a detectable amount

of heroin, in violation of Title 21, United States Code 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1),  
841(b)(1)(A), and 846.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records prepared by law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my involvement in this investigation, and my conversations with other law enforcement agents and officers, I have learned, among other things, the following:

a. On or about June 4, 2018, a Grand Jury in this district returned an indictment (the "Indictment"), 18 Cr. 390 (PAE), charging 17 defendants, including Maurice Hartley, a/k/a "Bugz," and Marie Palumbo, with conspiring to distribute and possess with intent to distribute 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, and one kilogram and more of mixtures and substances containing a detectable amount of heroin. As alleged in the Indictment, Hartley led a drug trafficking organization (the "DTO") that has been connected to five overdose deaths in the Bronx, New York.

b. On or about June 4, 2018, the Honorable Robert W. Lehrburger, United States Magistrate Judge for the Southern District of New York, issued search warrants for five locations associated with the DTO, including a residence in the Bronx that Hartley shares with his girlfriend, TIA JASPER, the defendant (the "Hartley Residence").

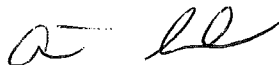
c. On or about June 5, 2018, law enforcement agents arrested Hartley and searched the Hartley Residence pursuant to the search warrant. During the search, agents recovered approximately \$140,000 in United States currency and a bag that contained

approximately 2.5 kilograms of a substance that appears consistent with heroin (the "Bag"). While the agents were searching the Hartley Residence, JASPER attempted to hide the Bag under bedsheets in an effort to prevent agents from finding the Bag.


d. The agents also recovered several keys to storage units from JASPER's keychain. JASPER informed the agents that she had a storage unit in her name (the "JASPER Storage Unit"), which was used to store her mother's belongings. JASPER provided consent to search the JASPER Storage Unit. The agents searched the JASPER Storage Unit and recovered, among other things, approximately \$100,000 in United States currency.

6. After being advised of her Miranda rights and waiving her rights, TIA JASPER, the defendant, stated, in substance and in part, that, over the last two years, she supplied heroin on at least four occasions to Marie Palumbo, who, as alleged in the Indictment, was transporting the heroin to upstate New York to be resold. JASPER also stated, in substance and in part, that when Maurice Hartley, a/k/a "Bugz" was not available, JASPER provided heroin to members of DTO on Hartley's behalf.

WHEREFORE, the deponent respectfully requests that TIA JASPER, the defendant, be imprisoned or bailed, as the case may be.

  
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ANTHONY SNEAD  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
5th day of June 2018.

  
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THE HONORABLE ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK