

ATTACHMENT B

1. I, Andrew M. Rixham, Special Agent of the Federal Bureau of Investigation, being duly sworn, depose and state that:

2. I am a Special Agent of the Federal Bureau of Investigation ("FBI") assigned to the Philadelphia Division, South Jersey Violent Offender and Gang Task Force ("SJVOGTF") in Cherry Hill, New Jersey. Prior to being assigned to the SJVOGTF, I was assigned to the FBI South Jersey Resident Agency in Cherry Hill, New Jersey. I have been a Special Agent with the FBI since 2004. As such, I am empowered by law to conduct an investigation of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Accordingly, I am an "investigative or law enforcement officer" within the meaning of Title 18, United States Code, Section 2510(7). I have received training in investigating violations of federal statutes from the FBI Academy located in Quantico, Virginia. As a Special Agent, I have also received specialized training in telecommunications exploitation. I have conducted physical and electronic surveillance, debriefed confidential human sources and participated in numerous arrest and search warrants. I have participated in numerous narcotics and gang investigations and debriefed or participated in the debriefings of numerous defendants, informants and witnesses who had personal knowledge of narcotics trafficking and gang organizations. I have participated in all aspects of narcotics/gang investigations including conducting surveillance, analyzing toll information obtained as a result of issued subpoenas, and analyzing information obtained from court ordered pen registers and trap and

trace intercepts. I have also assisted in investigations involving the interception of wire communications.

3. Through my training and experience and through consultation with other law enforcement officers experienced in narcotics investigations I am versed in and familiar with the mode and methods as well as the jargon and coded language utilized by traffickers of Controlled Dangerous Substances (“CDS”) and in particular narcotics traffickers in and about the City of Camden.

4. This Affidavit is submitted in support of a criminal complaint charging Carl Wiles, aka “Call Call,” aka “Ali;” Fuquan Pulliam, aka “Fu” aka “SG;” Kahlil Mims, aka “Lil;” Keith Jackson; Justin Gould, aka “Jay;” Marqueis Thomas-Randall, aka “Marqueis Randall,” aka “Marty;” William Gideon, aka “Will;” and Elquinzie Lewis, aka “Quince Lewis” for their role in a conspiracy to distribute and to possess with intent to distribute 280 grams or more of a mixture or substance described in Title 21 U.S.C. Section 841(b)(1)(B)(ii)(II) containing cocaine base, a Schedule II drug controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I drug controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and a detectable amount of cocaine, a Schedule II drug controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), in violation of Title 21, United States Code, Section 846 and Title 18, United States Code Section 2.

Summary of the Investigation

5. Since approximately January 2012, the FBI SJVOGTF has conducted an investigation into the drug trafficking activities of Carl Wiles, aka “Call Call,” aka “Ali,” and his associates.¹ During the investigation, the SJVOGTF utilized numerous techniques including, but not limited to, confidential sources of information, consensually recorded conversations, controlled drug buys, video “pole” camera surveillance, physical surveillance, court-authorized tracking warrants, and court authorized interception of wire and electronic communications.

6. This investigation has revealed that Wiles heads the Drug Trafficking Organization (“DTO”) centered around an open air drug market, commonly referred to as “set” or “drug set” near the intersection of 8th and Tulip Streets (738 Tulip Street) in the Morgan Village section of Camden, New Jersey. The drug activity of Wiles’ DTO extends to, but is not limited to, a retail shopping plaza in the 700 block of Morgan Boulevard and areas within the Crestbury Apartments (“CBA”) located in the 2500 block of South 8th Street. The DTO is responsible for the distribution of heroin, crack cocaine, and powder cocaine through hand-to-hand drug transactions with customers on the street and through cellular telephone drug transactions with customers and suppliers in and around the City of Camden, New Jersey.

1. Members of this conspiracy have been identified through multiple methods, including but not limited to: physical surveillance, video surveillance; monitoring of court authorized intercepted wire communications, law enforcement and motor vehicle records, public databases, phone records and/ or identification by an Undercover Employee (“UCE”) and Confidential Source (“CS”). Additionally, the identities of callers associated with intercepted communications were established through the use of controlled buys and surveillance conducted in conjunction with the monitoring of the authorized interception of communications during the course of the investigation.

7. This investigation further revealed that Carl Wiles, aka “Call Call,” aka “Ali,” Fuquan Pulliam, aka “Fu,” aka “SG,” Kahlil Mims, aka “Lil,” Justin Gould, aka “Jay,” Marqueis Thomas-Randall, aka “Marqueis Randall,” aka “Marty,” William Gideon, aka “Will,” and Elquinzie Lewis, aka “Quince Lewis” were members of the DTO during the conspiracy, the purpose of which was to profit from the distribution of controlled dangerous substances, namely heroin, crack cocaine, and powder cocaine in the City of Camden, New Jersey. In addition, Keith Jackson was identified as a heroin supplier to the DTO. Wiles headed the DTO. Wiles, Pulliam and Mims managed operation of the drug set near the intersection of 8th and Tulip Streets, to include supplying the set workers with heroin, crack cocaine, and powder cocaine, and collecting the proceeds from the illegal drug sales from the set workers. Set workers identified by law enforcement include but are not limited to Gould, Randall, Gideon, and Lewis.

8. During this investigation, the DTO sold heroin which was sealed in different colored ziplock bags; clear bags with a red devil symbol; blue colored bags with a red Superman symbol, yellow bags with a black Batman symbol, and clear bags with a green dinosaur symbol. Law enforcement confirmed the use of these different colored bags through multiple consensually recorded controlled purchases of CDS from the DTO. In addition, through the monitoring of intercepted communications, law enforcement was able to determine that the members of the DTO used coded conversation to discuss these different colored bags. The DTO used the term “Redskins” (red-colored football uniforms) for red devil bags and/or red Superman bags of heroin; “Steelers” (black and yellow- colored football

uniforms) for the yellow bags with the black Batman symbol; and “Green Bay” or “Jets” (green colored football uniforms) for the green dinosaur bags of heroin.

9. The DTO packaged crack cocaine in blue-colored heat sealed bags, which were sold at the drug set at 8th and Tulip Streets for \$5 per bag and to a confidential source (hereinafter “CS”), for \$10 per bag via phone order.

10. The DTO sold clear bags of powder cocaine at the 8th and Tulip Streets drug set for \$10 per bag. In addition, Pulliam sold blue-colored bags of powder cocaine to telephone customers for \$20 per bag. Law Enforcement confirmed the above prices and packaging of the crack cocaine and powder cocaine through multiple consensually recorded controlled purchases of CDS from the DTO. In addition, through the monitoring of intercepted communications, law enforcement was able to determine that members of the DTO also used coded conversation to discuss the packaging of the crack and powder cocaine. The DTO used the term “Giants” (blue football uniforms) for crack cocaine and “clear,” white”, “White Sox” or “Raiders” for powder cocaine sold at the 8th and Tulip Streets drug set. Law Enforcement confirmed the above prices and packaging of the heroin through multiple consensually recorded controlled purchases of CDS from the DTO.

11. In connection with this investigation, utilizing a CS, the SJVOGTF has made over 10 separate controlled purchases of heroin, crack cocaine, and/or powder cocaine from Wiles and/or Pulliam between September 2012 and March 2013. In addition, a UCE has made three separate controlled purchases of CDS from set workers at the 8th and Tulip Streets drug set. The UCE purchases included heroin, crack cocaine, and powder cocaine.

12. Additionally, in connection with this investigation, video “pole cameras” were put in place and positioned to surveil hand-to-hand transactions consistent with narcotics sales, as well as the presence of Wiles, Pulliam and Mims, and their co-conspirators on the 8th and Tulip Streets drug set and other areas within the Morgan Village area of Camden. This surveillance revealed what is believed to be daily drug trafficking activity by members of the conspiracy. Further, in connection with this investigation, court- authorized interceptions of wire and electronic communications²

2 (a) On January 7, 2013, The Honorable Robert B. Kugler, United States District Court Judge for the District of New Jersey, signed an Order, Miscellaneous Number 13-26 (RBK), authorizing the interception of wire and electronic communications occurring over the cellular telephone facility with electronic serial number 268435457815206010, currently assigned telephone number (856) 571-7147, used by Wiles, for a period of 30 days. Interception pursuant to the Court’s authorization began on January 7, 2013, was extended on February 6, 2013, and was terminated on February 11, 2013 when it was determined that Wiles had ceased using the Target Phone.

(b) On February 11, 2013, The Honorable Judge Robert B. Kugler, United States District Court Judge for the District of New Jersey, signed an Order, Miscellaneous Number 13-29 (RBK), authorizing the interception of wire and electronic communications occurring over the cellular telephone facility with international mobile subscriber identity 310260535704050, currently assigned telephone number (856) 278-9644, and over the cellular telephone facility with international mobile subscriber identity 310260561378390, currently assigned telephone number (701) 491-0659 used by Pulliam and Mims, for a period of 30 days. Interception pursuant to the Court’s authorization began on February 12, 2013, was extended on March 13, 2013 and was terminated on March 27, 2013 when it was determined that Pulliam and Mims ceased using the target phones. In addition, the March 13, 2013 Order (Miscellaneous Number 13-29 (RBK)), authorized interception of wire and electronic communications occurring over the cellular telephone facility with international mobile subscriber identity 310260565749714, currently assigned telephone number (856) 534-6604 used by Pulliam, for a period of 30 days. Interception was terminated on March 27, 2013 when it was determined that Pulliam ceased using the target phone.

(c) On February 26, 2013, The Honorable Joseph E. Irenas, Senior United States District Court Judge for the District of New Jersey, signed an Order, Miscellaneous Number 13-30 (RBK), authorizing the interception of wire and electronic communications occurring over the cellular telephone facility with electronic serial number A00000403957E5, currently assigned telephone number (609) 238-6686, used by Wiles, for a period of 30 days. Interception pursuant to the Court’s authorization began on February 26, 2013, was extended on March 27, 2013 by The Honorable Jerome B. Simandle, Chief United States District Court Judge, for the District of New Jersey and continues at the time of this Affidavit. In addition, the March 27, 2013 order authorized the interception of communications occurring over the cellular telephone

were in place from January 7, 2013 and continue as of the date of this Affidavit. To date, law enforcement has intercepted wire and electronic communications, including over two separate cellular telephones of Carl Wiles, two separate cellular telephones shared by Fuquan Pulliam and Kahlil Mims, an additional telephone used by Pulliam and a cellular telephone used by Keith Jackson. Wiles, Pulliam and Mims, and co-conspirators communicated regularly about illegal drug activity, as detailed below.

13. The investigation has revealed, based on surveillance and court authorized telephone interceptions, that the DTO typically operated the drug set at 8th and Tulip Streets selling heroin, powdered cocaine and crack cocaine to customers on a daily basis 24 hours a day and 7 days a week, utilizing a set manager and three shifts of set workers.

14. The individual heroin bags sold by the DTO were packaged into “bundles” which is a common street term used for the packaging of multiple bags of heroin. Through intercepted communications, controlled purchases of narcotics and information provided by confidential sources the investigation revealed that heroin bundles associated with this DTO conspiracy typically contained at least 10 to 12 individual bags. During this investigation, the CS purchased multiple bundle quantities of heroin from the DTO. In addition, through monitoring of intercepted wire communications, law enforcement was able to determine that the drug set was supplied with multiple bundle quantities of heroin on a daily basis. Based upon lab

facility with electronic serial number 268435461705893335, currently assigned telephone number (856)916-8031, used by Jackson, for a period of 30 days. The interception on this telephone continues at the time of this Affidavit.

reports³, each bag consisted of approximately .01875 grams of heroin. Based upon intercepted communications and discussions by members of the DTO of quantities of crack cocaine being sold and resulting monies being earned, each bundle of crack cocaine is believed to contain approximately 40 bags. Based on lab results, each bag of crack cocaine is believed to consist of approximately .055 grams of cocaine base. Based on lab results, each bag of powder cocaine is believed to contain approximately .14 grams of cocaine. Based on the overall investigation, to include controlled purchases, and the specific intercepted wire communications of Wiles and his associates, it is believed that this DTO was operational for at least one year and likely since 2011. Based on the duration of the operation and the quantity of heroin, powder cocaine and crack cocaine believed being sold, I believe the members of this DTO conspiracy have sold in excess of 100 grams of heroin, 100 grams of powder cocaine and 280 grams of cocaine base (crack cocaine) .

Heroin Supplier

Keith Jackson

Owners and Set Managers

Carl Wiles, aka "Call Call," aka "Ali"

Fuquan Pulliam, aka "Fu," aka "SG"

³ On March 26, 2013, the U.S. Drug Enforcement Administration (DEA), Northeast Laboratory notified your Affiant of the results of four drug exhibits that were submitted for testing. On February 21, 2013, the CS made a controlled purchase of 24 bags of suspected heroin and 20 bags of suspected crack cocaine from Fuquan Pulliam. The suspected heroin tested positive for heroin hydrochloride and had a net weight of .45 grams. The suspected crack cocaine tested positive for cocaine base and had a net weight of 1.1 grams. On February 26, 2013, a UCE made a controlled purchase of 3 bags of suspected cocaine and 3 bags of suspected crack cocaine from William Gideon in the area of 738 Tulip Street in Camden. The suspected cocaine tested positive for cocaine hydrochloride and had a net weight of .42 grams. The suspected crack cocaine tested positive for cocaine base and had a net weight of .25 grams.

Kahlil Mims, aka "Lil"

Set Workers

Justin Gould, aka "Jay"

Marqueis Thomas-Randall, aka "Marqueis Randall," aka "Marty"

William Gideon, aka "Will"

Elquinzie Lewis, aka "Quince Lewis"

Controlled CDS Purchases

15. On January 8, 2013, members of the SJVOGTF met with the CS for the purposes of conducting a controlled purchase⁴ of CDS from Wiles⁵. At approximately 4:13 pm, while in the presence of law enforcement, the CS dialed Wiles' telephone

4 The FBI ("CS") has been cooperating since February 12, 2010. The CS has no prior felony convictions. The CS was arrested in December 2010 and was found guilty of Failure to Give CDS to Police in the State of New Jersey. Information provided by the CS has been routinely corroborated through other law enforcement sources, pen register analysis, physical surveillance and consensual recordings. I am unaware of any unauthorized criminal activity by the CS during the course of his cooperation with the Government. Information provided by the CS has proven to be reliable and has been corroborated by information learned during the course of this investigation. The CS has received monetary payments from the FBI for the information provided and participation in controlled purchases during the course of this investigation.

Unless otherwise noted, the following procedures were followed by law enforcement in all controlled purchases: Prior to and following each controlled purchase, law enforcement conducted a search of the CS and the CS's vehicle for money and/or contraband with negative results. Additionally, each controlled purchase was consensually recorded with the consent of the CS. Law enforcement monitored the CS during the trip to and from the meet location. The CS neither stopped nor came into contact with any persons during the time. Following each controlled purchase of CDS, the recorder was collected and turned off by law enforcement.

5 In September of 2012, the CS made a controlled purchase of heroin from Wiles. Prior to this time the CS was not familiar with Wiles and had not had any direct contact with Wiles. During the controlled purchase, Wiles introduced himself to the CS as "Ali," and provided the CS with his phone number. Following the controlled purchase, the CS positively identified Wiles as "Ali" from a photograph.

number of (856) 571-7147.⁶ The following is a transcript of the law enforcement intercepted conversation between the CS and Wiles:

Wiles: Hello

CS: Yo. It's John.

Wiles: What's up bro? Yo right now, I'm not even around and shit right now bro. I'm just gonna have to get with you next time, or what you do really is let me know way before so that time I can be around.

CS: Yeah, cause I needed like five of them too.

Wiles: Yeah.

CS: How long gonna be? Like a while, while.

Wiles: Probably like, it will probably be dark by the time I get back.

CS: It will be dark?

Wiles: Yeah.

CS: Alright. I'll call you before I head back, just to, you know, if I have it already, I'll have it, but alright.

Wiles: Alright.

16. The CS explained that he told Wiles he wanted five bundles of heroin. Wiles responded by saying that he was not available to meet the CS at that time and that the CS should call ahead of time in the future.

⁶ Unless otherwise noted, telephone calls and/or text messages described as occurring in connection with each controlled purchase between the CS's cellular telephones and Wiles/ Pulliam's telephone number were observed by law enforcement as they occurred and/or by reviewing the CS's cellular telephone after the contact was made. The telephone calls and/or text messages between the CS and telephone number were also corroborated by law enforcement through analysis of pen register information where available.

17. Within a minute of the conclusion of the above phone call, at approximately 4:14 pm, law enforcement intercepted a telephone call from Wiles to Fuquan Pulliam's telephone number (856) 278-9644, which was unanswered. At approximately 4:15 pm, law enforcement intercepted another telephone call from Wiles to Pulliam's second telephone number (727) 437-8015. The call was answered by Pulliam and the following is a transcript of a relevant portion of the conversation:

Wiles: Yeah. He just called and shit.

Pulliam: And he said something about that, that car?

Wiles: Nah, nah. Ain't said nothing about it. I just said to the motherfucker that I ain't around.

Pulliam: Oh, oh, oh, no. Holler at him man. We need those. Sup man, I am here man, come on, round two.

Wiles: Alright. Alright. Alright, I am gonna call him.

Pulliam: Alright. Alright. Yo.

18. Based on the previous call, I believe Wiles wanted to confer with Pulliam prior to selling CDS to the CS. At approximately 4:18 pm, the CS received an incoming text message from Wiles that read, "Like in a haff hour." In response, the CS sent an outgoing text message to Wiles that read "Word same spot." The CS advised that "same spot" meant the Pathmark parking lot, on Mount Ephraim Avenue, Camden, New Jersey, as previous controlled buys between the CS and Wiles had taken place at that location. Prior to the CS departing to meet with Wiles, law enforcement provided the CS with \$700, \$500 to purchase five bundles of heroin and \$200 to use in an attempt to purchase powder cocaine. Law enforcement provided the CS with a recording device

which law enforcement activated at approximately 4:29 pm. The CS then departed from where he met with law enforcement officers to conduct the narcotics purchase.

19. The CS drove his vehicle to the Pathmark Parking lot and parked behind the Villa clothing store and Wiles arrived at approximately 5:19 pm. The CS reported that Wiles arrived alone, driving a gray Nissan Maxima. The CS gave Wiles \$500 in exchange for 5 bundles of suspected heroin. During the heroin transaction with Wiles, the CS inquired of Wiles as to the possibility of also purchasing \$200 worth of powder cocaine. Wiles responded by saying, "Wait right here. I will bring it right back." Wiles then told CS to go wait in the McDonalds parking lot across the street on Mount Ephraim Avenue. At approximately 5:20 pm, Wiles departed from the Pathmark parking lot and the CS drove across the street and parked in the McDonalds parking lot.

20. At approximately 5:20 pm, on January 8, 2013, law enforcement intercepted a telephone call from Wiles to Pulliam's telephone number (727) 437-8015. The call was answered by Pulliam and the following is a transcript of the conversation:

Pulliam: Yo

Wiles: Where you at?

Pulliam: At Dey Dey's house.

Wiles: Alright, um, motherfucking, be at the door in like, wait till like two minutes. I'm coming up from Mount Ephraim, hurry up though. I don't want to be (inaudible).

Pulliam: Why? What happened?

Wiles: Nothing. My, my peoples gonna holler at you.

Pulliam: Alright.

Wiles: Hurry up though, cause I gotta get something else real quick, I am coming to get you right now though.

21. Based on the investigation, it is believed that Wiles supplies heroin to phone customers and Pulliam supplies cocaine to phone customers. Since the CS had asked Wiles for powder cocaine, I believe Wiles called Pulliam to pick him up and take him to sell cocaine to the CS. In addition, Pulliam told Wiles that he was at “Dey Dey’s house.” During the course of the investigation, law enforcement surveillance has observed Pulliam on multiple occasions at 811 Olive Street, Camden, New Jersey in the Crestbury Apartments, which is believed to be the residence of A.M., aka “Dey Dey.”⁷

22. At approximately 5:30 pm, Wiles again met with the CS in the McDonalds parking lot. Wiles arrived driving the same gray Nissan sedan, with another black male in the front passenger seat. The CS advised that he gave the male - later positively identified by the CS as Fuquan Pulliam - \$200 in exchange for 10 bags of suspected cocaine. The CS asked the unknown male for his telephone number, to which the unknown male said “856- 278-9644” and to call him “SG.” The CS then returned to a predetermined meeting location, and met with law enforcement officers.

23. During the meeting with law enforcement officers following the controlled buy, the CS turned over 60 bags of suspected heroin and 10 bags of suspected cocaine to law enforcement. The CS also turned over the recording device, at which time law enforcement deactivated it. Law enforcement field tested the suspected heroin, which produced a positive reaction for heroin. Law enforcement field tested the suspected

⁷ A check of the New Jersey Division of Motor Vehicles revealed a driver’s license for A. M., 811 Olive Street, Camden, New Jersey.

cocaine which produced a positive reaction for cocaine. The suspected heroin and cocaine were sent to the DEA and test results are pending.

24. On January 15, 2013, members of the SJVOGTF met with the CS for the purposes of conducting a controlled purchase of CDS from Pulliam⁸. Prior to meeting with law enforcement, law enforcement instructed the CS to contact the individual the CS knew as "SG" to set up a narcotics transaction. Law enforcement viewed the CS's cellular telephone and observed text messages between the CS and Pulliam that were exchanged prior to the meeting with law enforcement. The CS had sent an outgoing text message to Pulliam's telephone number (856) 278-9644 that read "yo this jonh ali boy u gave me ur number last week at Mcdons I need 400. Or at least 20 of them. Hit me back. Ill b up there at 2 oclock" and a second text message that read "Dat shit went fast as hell." Shortly thereafter, the CS received an incoming text from Pulliam's telephone number (856) 278-9644 that read "Ard just call me." The CS advised that he had asked "SG" for 20 bags of \$20 worth of cocaine for a total of \$400 and that he would be in Camden at 2:00 pm. In response, Pulliam told the CS to call him.

25. Law enforcement provided the CS with a recording device⁹. At approximately 3:05 pm, while in the presence of law enforcement, the CS dialed Pulliam's telephone number (856) 278-9644 utilizing the CS's cellular telephone. The CS positioned the phone in a manner that enabled law enforcement to hear the conversation. A male voice told the CS that he would be at the McDonalds in four minutes. The CS advised that he would meet "SG" in the same location as the previous meeting with "SG", the

8 . Following a controlled purchase of crack cocaine on January 15, 2013, the CS positively identified Fuqaun Pulliam as "SG" from a photograph.

9 The recording device failed to operate during the telephone calls on January 15, 2013, so there are no recordings of the telephone calls.

McDonalds parking lot on Mount Ephraim Avenue, Camden, New Jersey. Prior to the CS departing to meet with Pulliam, law enforcement instructed the CS to inquire about acquiring a quantity of crack cocaine from Pulliam after the purchase of powder cocaine. Law enforcement provided the CS with \$600, \$400 to purchase 20 bags of powder cocaine and \$200 for the purchase of crack cocaine. Provided with a recording device which was activated by law enforcement, at approximately 3:06 pm, the CS departed from where he met with law enforcement officers to conduct the narcotics purchase.

26. At approximately 3:18 pm, the CS telephoned law enforcement. The CS advised that "SG" had called and changed the meeting location to the Pathmark parking lot across the street on Mount Ephraim Avenue. Based on my training and experience, drug dealers often change meeting locations at the last minute in order to conduct counter-surveillance and see if they or the customer is being followed. The CS moved his vehicle from the McDonalds parking lot to the Pathmark parking lot. At approximately 3:22 pm, law enforcement surveillance observed a black Mazda park next to the CS's vehicle. The CS advised that the individual he identified as Wiles was driving a black Mazda bearing Pennsylvania registration HZN-2363 and the individual he/she identified as Pulliam was in the passenger seat. The CS advised that he gave Pulliam \$400 in exchange for 20 bags of suspected powder cocaine. During the powder cocaine transaction, The CS and Pulliam engaged in the following conversation:

CS: Hey. Can you get readies? I'm sorry man. I just got a call because the one dude I'm selling it to. He asked how long I'm

going to be. He said see if you can't get readies on the way back. I don't even know if I want to. I got a couple extra hundred on me.

SG.: I got some good dimes man. What's up?

CS: Dimes of readies?

S.G. How many you want?

CS: 200.

SG: 200. I'm a take care of this. I'll be right back. It's official man.

27. The CS advised that the term "readies" meant crack cocaine and the term "dimes" corresponds to \$10 bags of crack cocaine. Pulliam told the CS that he could get the CS twenty \$10 bags of crack cocaine and to wait at that location for Pulliam to return. At approximately 3:23 pm, the black Mazda occupied by Wiles and Pulliam departed from the Pathmark parking lot, while the CS's vehicle remained.

28. Pursuant to the CS asking Pulliam for crack cocaine and in an attempt to determine where Pulliam stashes the crack cocaine, law enforcement conducted surveillance in the vicinity of 738 Tulip Street, Camden, New Jersey via a pole camera. At approximately 3:25 pm, law enforcement observed a black Mazda, stop in front of the residence at 738 Tulip Street. A black male, who was an unidentified subject ("UNSUB"), came off the front porch area of 738 Tulip Street and got into the back seat of the black Mazda. The black Mazda then drove off and out of the view of law enforcement surveillance. At approximately 3:27 pm, the black Mazda returned and stopped in front of 738 Tulip Street. The UNSUB exited the black Mazda, went into a house, possibly 738 Tulip Street. After a couple minutes, the UNSUB came from the front porch area of 738 Tulip Street, approached the passenger window of the black

Mazda, and appeared to hand something to the passenger. At approximately 3:30 pm, the black Mazda drove off and out of the view of law enforcement surveillance.

29. At approximately 3:33 pm, law enforcement surveillance observed the black Mazda back at the Pathmark parking lot parked next to the CS's vehicle. The CS advised that when Wiles and Pulliam returned the second time, the CS gave \$200 to Pulliam in exchange for 20 bags of suspected crack cocaine. The CS told Pulliam that his pricing for cocaine was high, to which "Ali" responded, "Every time you call, the powder, the readies..." Pulliam added "dope, whatever." I believe that Wiles and Pulliam were justifying the price of their CDS because they can conveniently provide the CS with powder cocaine, crack cocaine, and/or heroin whenever the CS calls. Pulliam further told the CS that a "quarter" is \$400 and an "eight-ball" is \$250. Based on my training and experience, and according to the CS, I believe the term "quarter" indicates 1/4 ounce of powder cocaine and the term "eight-ball" represents 1/8 ounce of powder cocaine. Following the controlled purchase, the CS then returned to a predetermined meeting location, and met with law enforcement officers.

30. During the meeting with law enforcement officers following the controlled buy, the CS turned over 20 bags of suspected powder cocaine and 20 bags of suspected crack cocaine to law enforcement. The CS also turned over the recording device, at which time it was deactivated by law enforcement. Law enforcement field tested the suspected powder cocaine, which produced a positive reaction for cocaine. Law enforcement field tested the suspected crack cocaine, which produced a positive reaction for cocaine. The suspected powder cocaine and crack cocaine were sent to the DEA and test results are pending.

31. According to the Pennsylvania Department of Transportation, registration HZN-2363 is registered to a 2012 Mazda sedan to EAN holdings LLC, 6929 N. Lakewood Avenue, Tulsa, Oklahoma 74117. Subpoenaed records from Enterprise Rent-A-Car reveal that the above-described vehicle was rented to M. W. of 367 Morris Street, Woodbury, New Jersey 08096, from January 10, 2013 through January 17, 2013.¹¹

32. On January 29, 2013, members of the SJVOGTF met with the CS for the purpose of conducting a controlled purchase of CDS from Pulliam. Prior to meeting with law enforcement, law enforcement instructed the CS to attempt to contact Pulliam to set up a narcotics transaction. Law enforcement viewed the CS's cellular telephone and observed text messages between the CS and Pulliam's telephone number that were exchanged prior to the meeting with law enforcement. At approximately 3:27 pm, the CS sent an outgoing text message to Pulliam's telephone number (856) 278-9644, stating "Yo its john im drivein up from de now..need to see for 20..dat cool b like a hour". No response was received in response to the text message. At approximately 3:40 pm, the CS sent an outgoing text message to Wiles stating "yo its john I text ur boy sg he didn't answer..im omw from de for 400..may need D now too. B around an hour..cool". At approximately 4:05 pm, the CS placed an outgoing text message to Pulliam's telephone number (856) 278-9644, stating "yo u there u get my text". At approximately 4:11 pm, the CS received an incoming text message from Wiles stating, "K". At approximately 4:11 pm, a follow up text message was received by the CS from Wiles

¹¹ Carl Wiles lists "367 Morris Street, Apt-1 Woodbury, NJ" as his address on his New Jersey Department of Motor Vehicles Driver's License. M. W. lists 367 Morris Street in Woodbury, NJ as her address on her New Jersey Department of Motor Vehicles Driver's License. Based on a prior law enforcement contact with Carl Wiles and M. W., it is believed that M. W. is the mother of Carl Wiles.

relating “how much d”. At 4:31 pm, the CS sent an outgoing text message to Wiles relating, “ok now I do need 4 D and still the 20 20s”. The CS advised that when he did not get a response from Pulliam he requested four bundles of heroin and 20 bags of cocaine from Wiles, each having a cost of \$20 dollars.

33. On January 29, 2013 at approximately 4:33 pm, law enforcement intercepted a telephone call from Wiles to Pulliam’s telephone number (701) 491-0659. During this conversation, Wiles stated, “look, my man gonna, umm, need twenty from you, yah heard?” Pulliam responded positively. Wiles then stated, “and then, and then he got four hundred for me. So look, so look, off each ten you count out for me, give him a extra two on each. Yeah heard?” Wiles and Pulliam both acknowledged the total number as forty eight. Wiles then told Pulliam that this should take place within an hour and Wiles was not sure if he would be back by that time. Based on my training and experience a bundle of heroin typically costs about \$100 on the street and contains 10 small bags of heroin. Wiles told Pulliam to include an extra two bags of heroin for every bundle, to make it 12 bags per bundle for a total of 48 bags.

34. The CS was provided with a recording device and \$800 for the purpose of purchasing \$400 worth of cocaine and \$400 worth of heroin. Law enforcement activated the recording device at approximately 4:44 pm.

35. At approximately 5:11 pm, the CS placed a call to Wiles. During the conversation, the CS indicated that he was present at the location of the meeting, which was approximately two blocks from 8th and Tulip Street, Camden, New Jersey. Wiles stated, “alright, I’m ‘bout to call him right now”. Wiles asked the CS if he would know who this person was by looking at his face. The CS stated, “Dude, how do I know his

face. What your boy SG?” Wiles responded “yeah”. The CS replied, “Oh. I texted him earlier. He never answered me.”

36. At approximately 5:17 pm, the CS sent a text message to law enforcement indicating that he had received the cocaine, but was waiting on the heroin. At approximately 5:18 pm, law enforcement observed via video surveillance a dark-colored Kia Sorrento, bearing Pennsylvania registration HRM-0461, park in front of the area of 738 Tulip Street, Camden, New Jersey¹². The driver never exited the vehicle but was approached by two black males who came from the area of 738 Tulip Street. One of these individuals appeared to hand the driver something. This vehicle then departed the area and law enforcement observed the vehicle turn south on 7th Street from Tulip.

37. At approximately 5:28 pm, the CS telephoned law enforcement advising that the transaction was complete. The CS then traveled to a predetermined location. Concerning the events of this purchase, the CS advised that Pulliam initially provided the CS with cocaine. Pulliam was driving a dark colored SUV, possibly a Kia or Hyundai. Pulliam instructed the CS to wait while Pulliam retrieved the heroin. The CS advised that within minutes, Pulliam returned with the heroin. The CS gave a total of \$800 to Pulliam for the purchase of these drugs. Law enforcement field tested the suspected powder cocaine, which produced a positive reaction for cocaine. Law enforcement field tested the suspected heroin, which produced a positive reaction for heroin. The suspected powder cocaine and heroin were sent to the DEA and test

¹² Pennsylvania registration HRM-0461 is registered on a 2013 Kia vehicle to Hertz Vehicles LLC. According to Hertz, the above referenced vehicle was rented on January 24, 2013 by a N.B., 17 Maple Walk, Camden, NJ (an address within the CBA). During the court authorized wire interception of Fuquan Pulliam’s telephone, law enforcement intercepted multiple telephone calls between Pulliam and a N. B. during which the use of rental vehicles was discussed.

results are pending. The suspected heroin was packaged in yellowish tinted plastic zip lock type bags with a black “Batman” symbol on them.

38. On January 30, 2013, a UCE (“UCE1”) who is experienced in the purchase of CDS from drug sets made a purchase of CDS (heroin) from the drug set located in the vicinity of 738 Tulip Street. UCE1 was equipped with a recording device and \$40 for the purpose of purchasing heroin. At approximately 2:49 pm, UCE1 travelled to the area of 738 Tulip Street where UCE1 observed a subject on the porch of 738 Tulip Street. UCE1 asked the subject on the porch for four “reds,” meaning four pre-packaged plastic bags containing heroin. Prior to this purchase, the CS had made multiple controlled purchases of heroin from Wiles contained in small bags with multiple red “devil” symbols. In addition, from the monitoring of the court-authorized wire intercepts of Wiles’ telephone during January 2013, law enforcement learned that the members of the DTO used the code word “Redskins” when referencing the heroin that was being sold on the drug set in the vicinity of 738 Tulip Street.

39. The subject on the porch nodded to UCE1 and motioned for UCE1 to circle the block and return. UCE1 later positively identified this subject as Justin Gould.¹³ As instructed, UCE1 drove away from the area to circle the block. As UCE1 departed the area of 738 Tulip, UCE1 observed Gould enter 738 Tulip Street through the front door of the residence. UCE1 then circled the block and returned to the area of 738 Tulip Street. After a few seconds, UCE1 observed Gould speaking with another subject at the front door of 738 Tulip Street. UCE1 observed Gould and the other subject reenter 738 Tulip

¹³ UCE1 identified Justin Gould, aka “Jay,” through a Camden County Sherriff’s Office arrest photograph. Gould was initially identified by law enforcement during this investigation through interaction with the Camden Police Department on January 10, 2013. Since January 2013, law enforcement has been able to monitor the activities of Gould at this drug set through the use of video “pole camera” surveillance.

Street through the front door. A few seconds later, Gould exited the front door of 738 Tulip Street and walked to the driver's side window of UCE1's vehicle. Gould again asked UCE1 what UCE1 wanted and UCE1 responded "four." Gould then removed a clear plastic sandwich type bag containing numerous yellow tinted plastic zip lock bags with a black "Batman" symbol on it from his jacket, counted out four bags and handed them to UCE1. UCE1 then handed Gould \$40 which he took and placed in his jacket pocket. Gould then walked away from UCE1's vehicle back towards 738 Tulip Street. The heroin purchased by UCE1 from Gould was field tested and produced a positive reaction for heroin. During the afternoon of January 30, 2013, pole camera surveillance recordings in the area of 738 Tulip Street showed that Gould engaged in behavior consistent with additional hand-to-hand drug transactions in front of 738 Tulip Street.

40. On February 26, 2013, UCE1, along with a second UCE ("UCE2") made a purchase of CDS from the drug set located in the vicinity of 738 Tulip Street. UCE1 was equipped with a recording device and \$60 for the purpose of purchasing both crack and powder cocaine. At approximately 3:00 pm, UCE1 and UCE2 went to the area of 738 Tulip Street, where they observed two subjects. UCE1 asked one of the subjects, later positively identified by UCE1 as William Gideon¹⁴, for three "readies," meaning three pre-packaged plastic bags containing "crack" cocaine, and for three "soft," meaning three pre-packaged plastic bags containing powder cocaine. Gideon acknowledged UCE1 and then ran down an alleyway directly across from 738 Tulip Street. UCE2 observed Gideon bend down in the alleyway and remove a stone type block, remove an

¹⁴ UCE1 identified Gideon through a New Jersey Department of Motor Vehicle Driver's License photograph. Gideon was initially identified by law enforcement during this investigation through interaction with the Camden Police Department on January 10, 2013. Since January 2013, law enforcement has been able to monitor the activities of Gideon at this drug set through the use of video "pole camera" surveillance.

unknown object, and then replace the stone. During this time, a marked Camden City Police vehicle drove in the area, causing the second subject to yell out “Black and Whites.” This warning by the second individual caused Gideon to duck down behind a fence. After a short while, Gideon returned to the UCE vehicle and handed UCE1 three blue tinted heat sealed bags containing a white rock like substance suspected to be crack cocaine and three clear heat sealed bags containing a white powder substance suspected to be powder cocaine. UCE1 then handed Gideon \$60, which Gideon counted. After Gideon counted the currency, he stated that UCE 1 gave him too much and handed UCE1 back \$15. The UCE paid \$10 per bag of powder cocaine (\$30 total) and \$5 for each bag of crack cocaine (\$15 total). Law enforcement field tested the suspected crack and powder cocaine, which produced a positive reaction for cocaine¹⁵.

41. During this time, pole camera surveillance was conducted of the area around 738 Tulip Street. Law enforcement observed the UCE vehicle arriving on Tulip Street and Gideon interacting with UCE1. During this time, law enforcement observed the other unknown subject acting in a manner consistent with a lookout on an “open-air” drug set. In addition, during the afternoon of February 26, 2013, pole camera surveillance recorded in the area of 738 Tulip Street revealed Gideon was engaging in behavior consistent with multiple hand-to hand transactions in front of 738 Tulip Street and that Gideon was visiting the same alleyway as previously noted by UCE2 during these transactions.

Court-Authorized Intercepts

15 As previously noted, on March 26, 2013, the U.S. Drug Enforcement Administration (DEA), Northeast Laboratory notified your Affiant that the suspected cocaine tested positive for cocaine hydrochloride. The suspected crack cocaine tested positive for cocaine base.

42. Law enforcement has monitored court-authorized interceptions of telephone and text communications between members of this DTO since January 7, 2013. During this time, law enforcement has intercepted communications discussing the overall operation of the drug set located in the vicinity of 738 Tulip Street in Camden, New Jersey, to include the resupply of heroin by Jackson. During this time, law enforcement has intercepted numerous conversations where it is believed that members of the conspiracy were discussing the shift schedules of the drug set workers and the daily resupply of narcotics. As stated previously, surveillance and court-authorized telephone interceptions reveal that the DTO typically operated the drug set at 8th and Tulip Streets selling heroin, powdered cocaine and crack cocaine to customers on a daily basis, 24 hours a day and 7 days a week utilizing a set manager and three shifts of set workers. Law enforcement has learned through this investigation that the members of the DTO normally use code words when discussing the narcotics that are sold at the drug set. Initial intercepted communications involved the discussion of "Redskins" and "Giants." Over time, the code "Redskins," was replaced with "Steelers" and/ or "Batman" and "Jets" and/or "Green Bay." Discussions of "clear," "white" or "White Sox" were also intercepted. Law enforcement, through monitoring of the intercepted communications, and through multiple controlled purchases from Wiles, Pulliam and the drug set discovered that "Redskins," "Steelers" / "Batman" and "Jets"/ "Green Bay" were references to the color of the bags that contain the heroin that was being sold by the DTO. "Redskins" was a reference to the red devil heroin bags, "Steelers" and "Batman" were references to the black and yellow-colored heroin bags that replaced the red colored bags. "Jets " and "Green Bay" were references to the green dinosaur bags of

heroin. The term “Giants” was a reference to the blue-colored bags of crack, while “clear,” “white,” or “White Sox” or “Raiders” were references to the clear plastic bags that contain the powder cocaine being sold at the drug set in the vicinity of 738 Tulip Street.

43. The court-authorized intercepts of Fuquan Pulliam revealed that Pulliam utilized multiple telephones. On one telephone, Pulliam had numerous customers who would contact him directly to arrange for the purchase of narcotics. Often, Pulliam would arrange to meet these customers personally at different locations, to include various sections of the Morgan Village area of Camden. On multiple occasions, Pulliam would direct these telephone customers to the area of 8th and Tulip Streets in order to have the customers purchase narcotics from the set workers at that location.

44. In addition to the court- authorized intercepts, surveillance, both physical and through the use of video “pole” cameras revealed that the drug set at 8th and Tulip Streets operated 24 hours a day, seven days a week during the course of this conspiracy. During surveillance, law enforcement observed Wiles, Pulliam, Mims, Randall, Gideon, Gould and Lewis on the drug set engaging in behavior consistent with the operation of an “open air” drug set. This behavior included conducting hand-to-hand transactions with both walk-up and vehicle customers, and/or meeting with individuals to resupply the drug set at 8th and Tulip Streets with CDS. Through the use of controlled buys and surveillance conducted in conjunction with the monitoring of the authorized interception of communications during the course of the investigation, the identities of callers associated with intercepted communications were established.

Wiles’ Leadership Role in the DTO

45. On January 10, 2013 at approximately 12:47 pm, three subjects were captured on pole camera surveillance video standing on the corner of 8th and Tulip Streets. During this time, Camden police officers observed these same individuals loitering in the area of 8th and Tulip Streets, an area well known to the Camden Police for criminal activity. Camden police officers requested their identities and positively identified them as Justin Gould, Marqueis Randall, and a third individual E.J., aka "E." A short time later, William Gideon was identified by the same Camden police officers standing directly in front of 738 Tulip Street. Gideon and Gould both provided Camden police officers with 738 Tulip Street as their home address. At approximately 12:55 pm, (during the time that Gould, Randall, and E.J. were interacting with the Camden Police), law enforcement intercepted an incoming telephone call to Wiles from William Gideon as follows in part:

Wiles: Yo.

Gideon: Damn, these dumb ass niggers done let Camden cops grab all three of them.

Wiles: Say it again.

Gideon: These niggas done let Camden cops grab all three of them. Jay Marty and mutherfucking, umm E. They got them all on the corner.

Wiles: But they good though?

Gideon: Huh?

Wiles: But they good though right?

Gideon: I don't know. I didn't even go outside, I don't know what's going on. I know they ain't got nothing, you feel me? So...

Wiles: Yeah, that's what I'm saying they good. As long as they good....

46. Approximately four minutes later, at 12:59 pm, law enforcement intercepted an outgoing telephone call from Wiles to Gould while Gould was still interacting with the Camden Police unit and visible on the video camera. The call, in pertinent part, is as follows:

Wiles: You straight?

Gould: Huh?

Wiles: Huh? I said you all straight?

Gould: Yeah, everything good...they just...he, he, he just um a little rookie dick head and he just taking mother fuckers names and all that. He didn't take my name though...he, he took my name but he ain't run my shit. He running names and all that.

Wiles: Alright.

Gould: But everything good though.

Wiles: Alright.

I believe these conversations between Wiles and Gideon and Wiles and Gould pertain to Wiles being updated on the status of his drug set workers while they were interacting with a Camden Police Officer. Specifically, when Wiles asks "but they good though," he was asking Gideon if "Marty" (Marqueis Randall), "Jay" (Justin Gould) or "E" (E.J.) have any CDS on them. Gideon responds that "I know they ain't got nothing, you feel me" meaning the set workers do not have any CDS on them.

William Gideon

47. On January 08, 2013, at approximately 7:37 pm, law enforcement intercepted a telephone call between Wiles and William Gideon. Gideon told Wiles "Yo, um, its rap for the Redskins and um, I got six dollars for the um, Giants, they on the um, you feel me." Wiles then asked Gideon "Alright, yeah, um that car left? Gidon then responded "Nah, that's what I'm saying, they sitting in Jay's car right now. They just sitting there and shit. M, Jay and Jeff just sitting in the car." I believe this call indicates that Gideon was out of heroin (Redskins) to sell and that he had \$600 of proceeds from the sale of crack cocaine (Giants). In addition, Gideon told Wiles that "M" (Marqueis Randall) and "Jay" (Justin Gould) were sitting in Gould's car. Pole camera surveillance during the investigation revealed that drug set workers would often sit in a vehicle in front of 738 Tulip Streets while they were working.

48. On January 9, 2013, at approximately 12:36 pm, law enforcement intercepted a telephone call between Wiles and William Gideon. During this telephone call, Gideon told Wiles "Yo um, last of the um, Redskins and everything. Still waiting for him to get on the last...he only got, um couple left, then he'll be on the last of the Giants but I'm waiting for Jay to come now." I believe this conversation involved Gideon updating Wiles on the status of their heroin and crack cocaine supply and that Gideon was waiting for Gould to arrive.

49. On January 9, 2013, at approximately 8:10 pm, law enforcement intercepted a telephone conversation between Wiles and William Gideon. During this conversation, Gideon asked Wiles what the "overall" was. Wiles told Gideon that they were at "five New York" and later he added "...with the Washington I think its uh, say eleven cause earlier you gave me the whole eight right." Gideon responded "Yeah" and Wiles then

stated “Uh yeah, it be um, no you gave me the seven earlier.” I believe this conversation pertains to the number of bundles of heroin and crack cocaine that were sold to that point, i.e., the “overall.”

50. On January 14, 2013, at approximately 1:18 pm, law enforcement intercepted a telephone call between Wiles and William Gideon. During this conversation, Gideon told Wiles “It’s a wrap for the Giants and there’s only two left for the Redskins.” Wiles acknowledged Gideon and then told Gideon to come to him. I believe this conversation involves Gideon telling Wiles that he was out of crack cocaine (Giants) and that he only had 2 bundles of heroin (Redkins) left.

51. On January 15, 2013, at approximately 6:42 pm, law enforcement intercepted a telephone call from William Gideon to Carl Wiles. Gideon told Wiles “Yo, I got the um, Giants and the halftime for the Redskins.” Wiles told Gideon that he should call “this nigga.” Law enforcement then intercepted an outgoing telephone call from Wiles to Pulliam. Wiles told Pulliam “he needs you.” Pulliam then responded, “he about to come right now, I already talked to him.” I believe these calls involve Gideon calling Wiles to tell him that he needed to be resupplied and Wiles telling Gideon to call someone else (identified on the next call to be Fuquan Pulliam). Pulliam then told Wiles that he already talked to Gideon and that they were going to get together.

52. On January 18, 2013 at approximately 5:45 pm, law enforcement intercepted an incoming call to Wiles from William Gideon. Gideon told Wiles that he “got, um 10 dollars from that Redskin game” and that he “got the 8 dollars from the Giants game, if you want to send the last quarter.” I believe this call pertains to Gideon telling Wiles

that he had \$1,000 of proceeds from the sale of heroin (Redskins game) and \$800 of proceeds from the sale of crack cocaine (Giants game).

53. On January 23, 2013, at approximately 10:52 am, law enforcement intercepted an outgoing call from Wiles to William Gideon. During this conversation, Gideon told Wiles that “Redskin’s wrap, he on the second Giants.” Wiles then asked Gideon what time he went in last night and Gideon responded that he went in at six and fell asleep by accident on the couch. At the end of this call, Wiles told Gideon to “call him and tell him to bring it to you.” At approximately 10:57 am, five minutes after the call between Wiles and Gideon, law enforcement intercepted an incoming call to Wiles from Pulliam. During this call, Pulliam asked Wiles where the “Redskins” were in his car. Wiles told Pulliam that they were “on top part of the glove compartment.” Wiles and Pulliam then discuss the “nigger” lying about what time he came in and that Wiles told him to call Pulliam. I believe these calls involve Gideon updating Wiles as to the level of CDS left to sell and Wiles questioning Gideon about what time he was on the set that day. In addition, after Wiles told Gideon to call “him and tell him to bring it to you,” Pulliam called Wiles and asked where to find the “Redskins,” indicating, that Pulliam was the person Wiles wanted Gideon to call. In addition, Wiles and Pulliam discuss what time Gideon came to work on the set.

54. On January 25, 2013, at approximately 10:20 pm, law enforcement intercepted a telephone call from Wiles that was initially answered by Marqueis Randall. When Randall answered the phone, Wiles asked where “Will” was. After Randall told Wiles that he was upstairs, Wiles then told Randall to “get him on the phone.” Wiles and Gideon then had the following conversation, transcribed in part:

Wiles: A, yo, you know it was fifteen red. It wasn't ten.

Gideon: Huh?

Wiles: It was fifteen on red.

Gideon: Yeah...

Wiles: Yeah, so when you gave it to him, you said it was everything.

Gideon: What you mean it was everything?

Wiles : That's what you said, I'm just making sure you know that ain't...

Gideon: I gave him ten.

55. I believe this call involves a discussion between Wiles and Gideon about the amount of money that Gideon gave to another individual from the sale of heroin. Gideon told Wiles that it was "ten" but Wiles indicates the total amount should have been "fifteen" indicating that Gideon had been given fifteen bundles.

56. On February 23, 2013 at approximately 4:30 pm, law enforcement intercepted a telephone call from Kahlil Mims¹⁶ to William Gideon. During this telephone call, Mims asked Gideon if he still had the "White Sox" and that "he said you didn't give it to him." Gideon responded that "aw shit, you know, nah probably didn't bro. I probably didn't." Gideon later stated that he was coming back up "there" and that he would pay him then.

16 On February 18, 2013, law enforcement intercepted a telephone call from Kahlil Mims to a bail bondsman. This call was intercepted on a telephone normally used by Fuquan Pulliam, (701-491-0659). During this telephone call, Mims identified himself as "Kahlil Mims" to the bail bondsman. Mims stated that he came home on Tuesday and that he was checking in with the bail bondsman as required. Since this date, Mims was the predominant user of telephone number 701-491-0659 and had an active role in the operation of the DTO drug set at 8th and Tulip Streets. Mims was repeatedly observed on video surveillance interacting with other members of the DTO.

At approximately 4:32 pm, law enforcement intercepted a telephone call from Gideon to Mims. Mims was with Marqueis Randall during this telephone call. Gideon told Mims that he thought about it and that he “ain’t forget cause altogether I gave em, um...it’s five altogether.” Mims then asked “You gave him five” and Gideon stated “five altogether.” Mims then put Randall on the phone and Gideon and Randall argued over the status of the money that was owed and the count of blue (crack cocaine) and white (powder cocaine). During this call, Gideon told Randall that “I gave you 100 in cash and 300 in um, Giants and then I gave you the 2 loose jaws and 80 dollars, right there, four twenties.” Randall told Gideon that he “will see” and would call Gideon back. I believe these calls involve Mims, as the set manager, trying to account for the proceeds and remaining CDS after Gideon’s shift. Eventually, Mims puts Randall on the phone to talk directly with Gideon about the status of the CDS and the money that was exchanged.

57. On March 4, 2013 at approximately 9:50 am, law enforcement intercepted an incoming call to Mims from William Gideon. During this call, Gideon told Mims that “Yo bro it’s a wrap for Green bay and I’m on the last of the Giants.” Mims responded “Alright, I’m on my way there now.” I believe this call referred to Gideon telling Mims that they were out of heroin (“Green Bay” is a reference to new, green colored bags) and on the last bundle of crack cocaine (Giants). Around this time, law enforcement intercepted multiple references to “Green Bay” and “Jets,” where normally the reference would be “Steelers.” This indicates to law enforcement that the DTO had switched the

color of their heroin bags from yellow and black (team colors of the Steelers) to green (team color of the Green Bay Packers and/or the New York Jets).¹⁷

Marqueis Randall

58. On January 22, 2013, at approximately 4:29 pm, Wiles placed an outgoing telephone call to Pulliam. Pulliam told Wiles that “Marty got the key to Dey Dey house.” Wiles asked “Where he at? I don’t know how to contact him.” Pulliam responded “He got that old number I had, 727 number.” Based on this conversation, it is believed that Pulliam gave his telephone with cellular telephone number (727) 437-8015 to Randall. Immediately after this call, at approximately 4:31 pm, Wiles called Randall (at Pulliam’s old number) and told him that he was “about to swing through there, just give this um, to Will, you heard.”

59. On February 1, 2013, at approximately 10:11 pm, law enforcement intercepted an outgoing call from Wiles to Marqueis Randall. During this call, Wiles asked Randall where he was and Randall replied that “I’m in here, I’m grabbing the last, the last jawn.” Wiles then stated “Ah, you taking too long. You just, look you just missed one.” Randall then replied “Nah, I just went in.” Wiles replied “Like, I came down there and made a whole u-turn and watched the other one walk to the other side bro. Like you moving too slow in there, like you better stop bullshitting.” I believe this call pertains to

¹⁷ On March 14, 2013, UCE1 made a controlled purchase of heroin from William Gideon at the drug set located at 8th and Tulip Streets in Camden. UCE1 purchased four bags of suspected heroin that were packaged in clear zip – lock bags with a green dinosaur symbol on the bag.

Wiles monitoring the workers on his drug set and telling Randall that he just missed a sale because he was not out on the streets.

60. On February 3, 2013 at approximately 8:05 pm, law enforcement intercepted a telephone call from Wiles to Randall. Wiles asked Randall "what's yellow look like?" Randall responded "It's getting there but I'm good." I believe this conversation involves Wiles asking Randall about the quantity of heroin remaining.

61. On February 4, 2013 at approximately 9:22 am, law enforcement intercepted a telephone call between Wiles and Pulliam. During this call, Pulliam asked Wiles "You told them don't do nothing until Marty come out?" Wiles responded "Nah, what the fuck you talking about?" Pulliam then asked "So the spot is open?" and Wiles stated "Yeah." Pulliam then told Wiles "All right I am on my way around there right now." Wiles then stated "Yeah, uh, you will still have to grab that from Marty or you can let him hold it until he come out it don't really make a difference." Pulliam acknowledged "Alright." I believe this conversation between Wiles and Pulliam involves Pulliam checking with Wiles if the set is waiting on Randall (Marty) to arrive with a supply of CDS. Wiles told Pulliam the set was open and that Pulliam could just let Randall bring them the remaining CDS or money when he returned.

62. On February 23, 2013 at approximately 9:50 pm, law enforcement intercepted an incoming telephone call from Randall to Mims. When Mims answered the phone, Randall stated "Yo, uh, clear." Mims responded "Clear?" Randall acknowledged "Yeah." Mims then stated "I don't got it, Fu got it." I believe this call

involves Randall's attempt to get resupplied with powder cocaine (clear). Mims told Randall that he did not have it and that he needed to call "Fu" (Fuquan Pulliam).

Justin Gould

63. On January 31, 2013, at approximately 8:12 am, law enforcement intercepted a telephone call between Wiles and both Justin Gould and William Gideon. Initially, Gould answered the phone and told Wiles that Gideon was "right here." Once Gideon began speaking on the phone, he and Wiles discussed the amount of "Redskins" and "Giants" that Gideon had remaining. When questioned by Wiles about what time Gideon went in, Gideon responded "We, I went in, well we was out all night. I had the door open but I was in the house though cause I ain't have no more Giants. The Giants been gone but I was still up the whole time." I believe this call involves Wiles calling Gould in an attempt to find Gideon. Wiles then questioned Gideon about not being outside on Tulip Street selling CDS on the overnight shift. Gideon told Wiles that he went inside because he ran out of crack cocaine (Giants).

64. On February 3, 2013, at approximately 3:08 pm, law enforcement intercepted an outgoing call from Wiles to Justin Gould. Wiles asked Gould "What it look like? It's alright...or like?" Gould responded "Motherfucking, ah, I think it's one Steelers left." Gould went on to say, "One Steelers left and um, I think there's like two, there should be two blue, or one blue left, I gotta see. But I know right now I got a couple dollars for you." I believe this call pertains to Gould updating Wiles on the quantity of CDS that he has remaining and that Gould has money to turn over to Wiles. This reference to

“Steelers” is to the new color of the heroin bags being sold (yellow with black Batman symbol).

65. On February 24, 2013, at approximately 1:43 pm, law enforcement intercepted a telephone call from Justin Gould to Kahlil Mims. During this call, Gould told Mims “Yo we need you.” At approximately 1:47 pm, law enforcement intercepted an outgoing call from Mims to Wiles. During this call, Mims told Wiles that “Jay need me right now, I took 6 Giants out.” At approximately 1:53 pm, law enforcement intercepted an outgoing call from Mims to Gould. During this call, Mims asked Gould “where you at?” and Gould responded “you gonna be outside my house?” Mims then stated “Yeah I’m swinging back around. Have everything ready.” At approximately 1:55 pm, video surveillance at this time captured a white conversion van parking on Tulip Street. Kahlil Mims is observed exiting the white van and meeting with Justin Gould on Tulip Street. Gould was observed putting his hands in his pockets as he walks away from Mims after their meeting. As Mims reenters the white van and departs, Gould was observed conducting a hand-to hand drug transaction on Tulip Street with a white female. A plastic sandwich style bag can be seen in Gould’s hand at the time. Gould then walks up the walkway and onto the porch of 738 Tulip Street. I believe this call, and this surveillance, pertains to Mims trying to meet up with Gould at the drug set on 8th Street in order to resupply Gould with more CDS. Mims was then observed meeting with Gould just prior to Gould completing a drug transaction.

Elquinzie Lewis

66. On February 23, 2013 at approximately 1:24 am, law enforcement intercepted a telephone call between Kahlil Mims and an unknown male. During this conversation, Mims and the unknown male discussed the unknown males' location and how he is going to get to Mims' location. During this call, Mims directed someone in the background to "go pick Quince up for me and bring him out here." Law enforcement was then able to identify "Quince" as Elquinzie Lewis, aka "Quince Lewis."¹⁹ At approximately 1:28 am, law enforcement intercepted another call between Mims and Lewis. During this conversation, Mims asked Lewis "Marty picked you up?" After Lewis responded "yeah," Mims directed Lewis to come to "Shawan's." I believe these calls involve Mims arranging for one of the drug set workers (Lewis) to get transportation to the drug set from another one of the workers (Randall). During the second call, Mims asks Lewis if Randall picked him up.

67. On February 27, 2013 at approximately 9:47 am, law enforcement intercepted an outgoing call from Kahlil Mims to Lewis. The conversation, in pertinent part, is transcribed as follows:

Mims: What you got like, what, wha, wha, what, What's your count? What you got? (unintelligible).

19 . Law enforcement in Camden, NJ had a record of multiple interactions with a Quince Lewis in the areas of 8th and Tulip Streets and 8th Street and Morgan Boulevard. A review of the Camden County Sherriff's Office arrest photographs revealed the same Quince Lewis with a last known address of 844 Tulip Street. Video surveillance, in conjunction with intercepted wire communications, revealed that this Quince Lewis was the "Quince" that was selling CDS at the 8th and Tulip Street drug set as part of Wiles' DTO. There is a New Jersey Driver's License for an Elquinzie Lewis that is the same person with an arrest record as Quince Lewis.

Lewis: My...my count is ahh, hold on, hold on for a sec.

Mims: It's four...it should be four, four and one.

Lewis: Yeah, two, four. Yeah. Will got the ahh, Will got the rest of the dope.

Mims: Damn bro. Don't talk like that.

Lewis: Oh my fault...my fault, my fault.

Mims: What,,what you need, how many Steelers you had gave him?

Lewis: Um...how many you gave me last night?

Mims: I gave you four.

Lewis: Four....Will got two.

Mims: What he got in blue?

Lewis: He aint got nothing in blue.

Mims: Oh....

Lewis: He waiting on , ah...yeah I'm finishing up these bags.

Mims: I'm about to come there bring to him now.

Lewis: Alright.

68. I believe this conversation pertains to Mims getting an update on the quantity of CDS that Lewis passed off to "Will" (William Gideon). During this call, Lewis told Mims that he gave the rest of the "dope" (a common term for heroin) to "Will" (William

Gideon). Mims told Lewis not to “talk like that” (not talking in code) and then asked Lewis how many “Steelers” (heroin) he gave to Gideon. Lewis then tells Mims that Gideon was out of “blue” (crack cocaine).

69. On February 27, 2013 at approximately 7:23 pm, law enforcement intercepted an incoming call to Mims from Lewis. During this telephone conversation, Lewis told Mims “Yo Lil, when you come around I need more powder.” Mims responded “You need, need a white?” and Lewis said “Yeah need white, my fault, my fault.” I believe this conversation pertains to Lewis asking “Lil” (Kahlil Mims) to bring more powder cocaine to him to sell. Mims then clarified that Lewis needed more “white” (code for powder cocaine). Lewis responded in the affirmative and then apologized for not talking in code.

70. On March 1, 2013 at approximately 1:53 am, law enforcement intercepted an incoming call from Lewis to Kahlil Mims. During this call, Lewis told Mims that he needed “two blue.” Mims confirmed that Lewis needed “blue” and told him that he was about to come there right then. Approximately three minutes later, at 1:56 am, law enforcement intercepted another incoming call to Mims from Lewis as transcribed, in part:

Mims: He, yo.

Lewis: Yo, yo. I got one, two, three, four niggers out here bro.

Mims: Bro, I’m coming bro. You should have called me way before you was about to run out.

Lewis: Cause I aint, I aint had, I wasn't, um, finished. I had just got done, as soon as when all these people started coming up.

Mims: Alright, well I'm coming now bro.

Lewis: Alright, Well...

Mims: You wait, you wait to the last bundle to call me. Instead of just calling me when you, let me know when you're on your second one.

Lewis: Alright, alright.

71. I believe these calls pertain to Lewis calling Mims to let him know he needed more "blue" (crack cocaine). Lewis then made a second call to tell Mims that he had customers on the set but no more CDS to sell. Mims then told Lewis that he should not wait until he was on the last "bundle" to call him and that he needed to call him sooner.

72. On March 1, 2013 at approximately 8:33 am, law enforcement intercepted an incoming call to Mims from Lewis. During this conversation Lewis told Mims that "Will need more, all white." Mims responded "Alright." I believe this call pertains to Lewis telling Mims that "Will" (William Gideon) needed more powder cocaine to sell. At approximately 8:39 am, the white conversion van previously associated with Kahlil Mims was observed on video camera surveillance departing CBA on 8th Street. At approximately 8:40 am, the same white van was observed on pole camera surveillance stopping in the vicinity of 738 Tulip Street. Quince Lewis was observed walking up to the driver side window of the van while William Gideon continued to engage in hand-to-hand transactions in the area. At approximately 8:42 am, the white van departed the area and was then followed to the back of CBA by physical surveillance. I believe Mims

travelled from the CBA to 738 Tulip Street to resupply Lewis and Gideon with powder cocaine.

73. On March 1, 2013, at approximately 2:49 pm, law enforcement intercepted an incoming text message to Wiles from Quince Lewis that read, in part: "Yurp boi no hard feelings bt Iquit..." I believe this text message is a message from Lewis telling Wiles that he was quitting the DTO. Prior to this, law enforcement had intercepted communications indicating that members of the DTO believed Lewis may not have been giving the customers the correct amount of CDS purchased due to complaints from customers.

74. At approximately 2:51 pm, law enforcement intercepted an outgoing telephone call from Wiles to Lewis. During this conversation, Wiles told Lewis, in part: "Like, first and foremost bro, I don't care what you got or what you doing. That don't mean nothing to me. And, number two, its just like with the clear how you said you thought they was that when they wasn't. You probably could be doing the same thing with that. Aint't no fein going to say something that ain't happening bro. We've been there a year strong now. Ain't no fein going to lie on nobody bro. All I'm saying is if you did it don't let it happen again. If you quit, you quit." Wiles also stated, "My thing is loyalty. You rolling with us, you got loyalty. You all right. You rolling with us that mean everybody you see got your back a hundred percent, like that's what I mean by loyalty. It's bigger than what's just going on. When shit really get on, this the people you can count on!" Later in the same conversation, Wiles stated, " I say loyalty and and like, th...th...this is a movement! In that area, bro, that's the strongest movement around. A...Ain't nobody coming out when we coming. It's up to you." At the end of this

conversation, Wiles told Lewis "...like now if you quit cause I'm going to work on replacing you..." to which Lewis replied "Yeah, I'm good."

75. Approximately one minute after the conversation between Wiles and Lewis ended, law enforcement intercepted a conversation between Wiles and Pulliam as follows:

Wiles: We gotta work on somebody for, ah third.

Pulliam: Cause he in the way, right?

Wiles: Yeah, not only that like what I say what happened, like he like, Whoa, I quit here and there like that. I really don't care if he quit or not. You know what I'm saying?

Pulliam: Yeah.

Wiles: But that ain't even the point, the whole thing is we gotta find somebody, so what I'm about to do, I'm gonna holler at Will but we need somebody for tonight.

Pulliam: Alright, Alright.

Wiles: I was...I was gonna say Jay but it would be hard for him to come out the next morning. Know what I'm saying.

Pulliam: Yeah.

Wiles: But we just got to find somebody for the ah, night. I'm gonna let Will know right now.

Pulliam: Alright.

Wiles: Alright.

76. I believe these conversations involve Wiles talking to Lewis about the importance of loyalty within the DTO. Wiles specifically stated that the “feins” (customers) would not lie about the transaction and that he thinks Lewis is stealing. In addition, Wiles states that “we’ve been there a year strong now,” indicating that his drug set on Tulip Street has been operational for one year. After the conversation with Lewis, Wiles told Pulliam that they were going to need someone to work the third shift (overnight) and that it cannot be Jay (Justin Gould) because he had to work the next morning.

Kahlil Mims

77. On March 1, 2013 at approximately 8:42 am, law enforcement intercepted an incoming call to Mims from Wiles. During this conversation Wiles asked Mims to grab something from the store for him. Mims then told Wiles “Yeah, yeah, and I’m about to get sit, sit, situated for uh, dimes and shit. I think it’s about .. I think, matter of fact, it’s over.” Wiles then asks “What everything, everything?” and Mims states “Yeah.” Later in the conversation, Wiles asked Mims to “grab me some soda.”

78. At approximately 8:44 am, law enforcement intercepted an incoming call to Mims from Pulliam. During this conversation, Mims told Pulliam that “You might have to bust a move soon.” When Pulliam did not understand, Mims stated “I said you might get ready to bust a move soon.” Pulliam then asked “Who do?” Mims then responded “Us, as far as Giants.”

79. At approximately 9:15 am, law enforcement intercepted an outgoing call to Wiles from Mims. The conversation between Mims and Wiles is transcribed, in pertinent part, below:

Mims: What your phone fucked up?

Wiles: Nah, I'm...wasn't in that room where it was at. What's up?

Mims: Oh yeah. I got that shit situated and I just, uh, I just came from the store and grabbing blue and shit. So we don't.... I got them already.

Wiles: Alright. Where's this nigga at cause I'm doing something. So he going to have to start that.

Mims: Uh, um, I don't know where the fuck he at. He ain't been around here yet.

Wiles: You ain't call him yet?

Mims: Yeah, I called him. He said he on is way.

Later in the same conversation, Wiles told Mims "Yeah, that's what I'm...just tell him to hurry up. I going to be knocking this other shit out the way real quick." Mims responded "Alright, cause they, they dying right now for blue." At approximately 9:16 am, law enforcement intercepted an outgoing call from Mims to Pulliam. During this call, Mims told Pulliam to "just come around, so you can, like start, start with that and shit..." Pulliam stated "alright." At approximately 9:22 am, law enforcement intercepted an outgoing call from Wiles to Pulliam. During this call, Wiles told Pulliam "you got to hurry up, there ain't nothing out there and I am doing that...." Wiles then responded "He just calling me, just now bro." At approximately 9:25 am, law enforcement intercepted a telephone call between Pulliam and Mims. During this conversation, Pulliam told Mims to meet him on 12th Street.

80. I believe that these telephone calls on March 1, 2013 pertain to Mims resupplying the drug set with more powder cocaine. Mims then talked to Wiles and updated him on the status of the set and that they were out of everything. Wiles then told Mims to get some "soda." Based on my training and experience, I am aware that baking soda is a common ingredient used to make crack cocaine. Mims then talked to Pulliam and let him know that they were going to have to "bust a move" on the Giants, meaning they were going to take action in the near future to get some more crack cocaine for the drug set. Mims and Pulliam then planned to meet up on 12th Street.

81. On March 1, 2013, at approximately 9:31 am, law enforcement intercepted an incoming call to Pulliam from Wiles. Wiles asked Pulliam where he was and Pulliam responded that he was "in front of your door." Approximately two minutes later, Wiles called Pulliam and told him "Look. Walk straight, turn to the right, look at the bush. You're going to see some white shit right there."

82. During this timeframe, the white conversion van, previously associated with Mims, was observed pulling onto Hunter Drive on video camera surveillance. Physical surveillance then confirmed the van was on Hunter Drive. Wiles has previously been seen at, and is believed to be living at 4 Hunter Drive. Based on the aforementioned series of interceptions between Mims, Wiles and Pulliam, it is believed that Mims picked up Pulliam on 12th Street and then drove Pulliam to Wiles' residence so that Pulliam could get something associated with the packaging or preparing of CDS from Wiles.

83. On March 5, 2013 at approximately 8:32 am, law enforcement intercepted an outgoing call from Pulliam to Mims. During this call, Pulliam asked Mims "Yo who out, Jay?" After Mims responded in the affirmative, Pulliam told Wiles "Remember I told you

to check on him. You know you got to be on him.” I believe this call pertains to Pulliam instructing Mims to make sure that he (Mims) keeps an eye on Jay (Justin Gould) while Gould works his shift on the drug set.

Pulliam’s Telephone Customers

84. In addition to the intercepted telephone calls between members of the DTO concerning the operation of the drug set in the vicinity of 738 Tulip Street, law enforcement intercepted numerous telephone calls between Pulliam and over 15 different telephone customers. These calls often involved a customer calling Pulliam and requesting a certain amount of CDS and Pulliam instructing the customer where to meet him to complete the transaction. Some of these customers appear to call Pulliam every day or every two to three days to purchase CDS directly from Pulliam. Pulliam would instruct customers to meet him at various areas in the Morgan Village section of Camden, to include Tulip Street. On multiple occasions, Pulliam instructed a customer to go to “8th and Tulip” to purchase CDS from set workers, including members of the DTO. As he did with the CS during the controlled purchases, Pulliam would sell \$20 bags of cocaine to telephone customers. Based on the contents of authorized telephone interceptions, Pulliam directed customers to the drug set at 8th and Tulip Streets, and the customers would then purchase smaller bags of powder cocaine (packaged in clear bags) for \$10 per bag.

85. On February 13, 2013, at approximately 4:33 pm, law enforcement intercepted an incoming telephone call from an unknown male (UM1) to Pulliam. The conversation is transcribed as follows:

UM1: Yo SG. Its Jay, I'm calling from my girls' phone. I need to see you.

You around?

Pulliam: Yeah, what's up?

UM1: Alright, yo. I need...I got forty-five. Can you do three and I'll give you, I'll give you the money tomorrow, the extra I owe you.

Pulliam: Nah, I can't do that bro. I'm not doing that. I'm not doing that.

UM1: Alright, just, just, just, just, just do two then, alright?

Pulliam: Alright.

86. At approximately 5:05 pm, UM1 called Pulliam and told Pulliam he is "out back." Pulliam then told UM1 that he was on "Tulip" and to come there. At approximately 5:05 pm, Pulliam is observed on a pole camera surveillance coming off the front porch of 738 Tulip Street. Pulliam is observed walking to his vehicle and then returning back to 738 Tulip Street. At approximately 5:07 pm, Pulliam again walks off the front porch of 738 Tulip Street and crosses the street to a stopped vehicle. Pulliam is observed sticking his arm inside the driver's window. Pulliam then walks back across the street and the vehicle departs. I believe these telephone calls and the video surveillance pertain to Pulliam arranging to sell two bags of powder cocaine to a customer for \$40. The customer wanted to get three bags and owe Pulliam the remaining money but Pulliam refused. As with the CS's controlled purchases, this

customer refers to Pulliam as “SG.” Pulliam directed the customer to Tulip Street to complete the CDS transaction because he was already there.

87. On February 21, 2013, at approximately 4:45 pm, law enforcement intercepted an incoming call to Pulliam from an unknown male (UM2). UM2 asks Pulliam if he is around and that he needs three. Pulliam directs UM2 to go to 8th and Woodland (approximately three blocks from 8th and Tulip). Approximately 10 minutes later, at 4:55 pm, Pulliam receives an incoming call from UM2 and immediately tells UM2 to “yo, go to 8th and Tulip, bro. Go to 8th and Tulip.” Approximately one minute later, Pulliam receives another incoming call from UM2 and tells him “8th and Tulip. Make a left and ask for ‘em and they going to tell you they are going to give it to you.” At approximately 5:02 pm, Pulliam receives another incoming call from UM2. UM2 asks Pulliam “yo, this stuff is the same as yours right? Cause I come to you because of the quality.” Pulliam responds “Yeah bro, yeah bro. Its ten dollars. That’s all it is bro. The same shit.” UM2 responds “alright.” I believe these calls pertain to UM2 wanting to purchase three \$20 bags of powder cocaine. Pulliam directs the customer to the DTO drug set at 8th and Tulip Streets and tells the customer to tell them (the set workers) what he needs. After making the purchase, the customer calls Pulliam to confirm that the cocaine is the same as he usually purchases from Pulliam. Pulliam tells the customer that the only difference is the price, and therefore the size of the bag.

88. On February 21, 2013 at approximately 6:56 pm, law enforcement intercepted an incoming call to Pulliam from an unknown male (UM3). UM3 told Pulliam “I’m going to come down for two.” Pulliam responded “alright.” At approximately 7:20 pm, UM3 calls Pulliam again and says “Listen can you do me a favor real quick.” Pulliam

responds "Go to 8th and Tulip and make a left, and talk to them when you pull up." UM3 then asks "can you do two for 35." Pulliam then responds, "man, just pull up and tell them how much you got and they'll take care of you on Tulip." At approximately 7:26 pm, UM3 calls Pulliam and asks if he is meeting with Pulliam. Pulliam tells UM3 "no, my boys, they going to take care of you bro." During this call UM3 asks Pulliam "do they got twos or do they got ones?" UM3 then states that he wants "two 20s for 35" and he will owe Pulliam the remaining 5 dollars. Pulliam tells UM3 to stop "telling on my phone dog."

89. At approximately 7:28 pm, UM3 called Pulliam again while he was on the drug set at 8th and Tulip. Pulliam told UM3 to put "him" (the drug set worker) on the phone. UM3 told Pulliam that "he" (the drug set worker) just went into the house. After a period of time, UM3 told Pulliam that here "he" comes. Pulliam again instructed UM3 to put "him" on the phone. The set worker then comes on the customer's telephone and identifies himself as "E." Pulliam asks "E" where "Marty (Marqueis Randall) is. "E" then tells Pulliam that Randall is "over there getting it." Pulliam then tells "E" to tell Randall to give him "three of the clear" because he has thirty dollars. "E" says "alright." I believe these calls pertain to a customer wanting to buy two 20 dollar bags of powder cocaine from Pulliam for 35 dollars. Pulliam directs this customer to the drug set at 8th and Tulip and then tells his set workers ("E" and Randall) to give the customer three 10 dollar bags of powder cocaine (clear) for 30 dollars.

90. Additionally, throughout the period of court-authorized interception, Wiles and Pulliam along with Mimms were overheard at different times and on many occasions discussing checking on set workers at 8th and Tulip Streets and making sure the

workers were working during their entire shift. The three were also overheard on numerous occasions throughout the interception period checking on the amount of CDS sold on the set, the amount of money collected by various workers, arranging to resupply the set when various supplies of CDS began to run low or became sold out and arranging to collect the money earned by the workers during their shift.

Keith Jackson

91. During the investigation, law enforcement intercepted numerous conversations and text messages between Wiles and Jackson. The nature and frequency of the calls and text messages between Wiles and Jackson made it clear to law enforcement that Jackson was supplying Wiles, the leader of the DTO, with CDS. Through intercepted calls and surveillance, as described in more detail below, it was determined that Jackson was supplying heroin to Wiles that in turn was sold by the DTO. Specifically, since the authorized interception of Wiles' communications on telephone number (609) 238-6686 that began on February 26, 2013, law enforcement has consistently intercepted calls between Wiles and Jackson that have led to approximately 23 meetings between Wiles and Jackson between February 27, 2013 and April 2, 2013. As described in more detail below, Jackson was positively identified by law enforcement after a meeting between Wiles and Jackson on February 28, 2013.

92. On February 27, 2013, at approximately 10:11 am, law enforcement intercepted a call from Mims to Wiles. Mims told Wiles that he needs "Steelers" (code for needing heroin). At 11:04 am, law enforcement intercepted a call between Mims and Wiles. During this call, Wiles told Mims that he was "coming out right now" which

indicated to law enforcement that Wiles was going to meet Mims. Approximately five minutes later, at 11:09 am, law enforcement intercepted a call from Wiles to Jackson. During this call, Wiles told Jackson that he was about to come to “MacArthur” and Jackson responded “give me like 15 minutes.” I believe these calls pertain to Mims needing to be resupplied with heroin (Steelers) and Wiles then calling Jackson to coordinate his own resupply of heroin from Jackson. It is believed that “MacArthur” refers to MacArthur Drive in Camden.

93. On February 28, 2013 at approximately 8:56 am, law enforcement intercepted a call from Wiles to Jackson. Wiles asked “What’s up bro. When um...it’s going to be ready?” Jackson responded “Alright, let me see. I’m ready to call him now.” I believe that Wiles needed a supply of heroin from Jackson and that Jackson had to call his own supplier to see the availability of the CDS.

94. On February 28, 2013 at approximately 9:08 am, law enforcement intercepted a call to Wiles from Jackson. Jackson asked, “Yo bro, where you at?” Wiles responded, “Um, gonna be, probably like the third store in like twenty minutes, fifteen minutes.” I believe that Jackson was attempting to locate Wiles as he had a quantity of heroin for Wiles and was requesting a meeting location.

95. On February 28, 2013 at approximately 9:48 am, law enforcement intercepted a call to Wiles from Jackson. Wiles told Jackson, “Coming down 9th.” I believe this call was to ascertain the location of each to consummate a narcotics deal.

96. Subsequent to the above phone calls, at approximately 9:50 am, on February 28, 2013, law enforcement surveillance observed Wiles’ silver-colored Chevrolet

Impala, Pennsylvania registration JDW-9560, approaching the area of 8th and Woodland Streets. Law Enforcement surveillance then observed Wiles' Impala parked at the corner, near "Union Urena Market," 759 Woodland Avenue, Camden, New Jersey²¹. Wiles was observed by law enforcement entering the passenger side of a green-colored Dodge sedan, possibly a Dodge Avenger, bearing New Jersey temporary registration F500187. At approximately 9:54 am, law enforcement observed Wiles exit the Dodge, re-enter the driver's side of his Impala, and depart the area. Law enforcement continued surveillance and observed the Dodge proceed into the Fairview section of Camden. Thereafter, law enforcement observed the Dodge parked in the 1300 block of Lakeshore Drive. Law enforcement observed an unknown male ("UM") driver exit the Dodge and meet with a group of unidentified black males loitering in the vicinity. After a short time, the UM was observed by law enforcement leaving the group of males, re-entering the Dodge, and departing from the area. A Camden Police Department marked patrol unit executed a traffic stop of the Dodge in the vicinity of Arnold Street and MacArthur Drive, Camden. The driver presented a driver's license identifying himself as Keith Jackson, DOB: December 18, 1982, 417 South 5th Street, Camden, New Jersey, and New Jersey Driver's License identification number of J00624290012822.²² Based on the phone calls and the surveillance conducted, I believe that Jackson was and still is the supplier of heroin to the Wiles DTO that sells CDS at 8th and Tulip Streets. This meeting between Jackson and Wiles leads me to believe that many narcotic deals have been consummated as both men understood the

21 The Union Urena Market at 759 Woodland Avenue, Camden, NJ, is the third store, if driving from Crestbury Apartments, North on 8th Street.

22 The Camden City Police Field Interview Report documenting the motor vehicle stop reflects that Keith Jackson was positively identified as operating a 2006 "Teal (Green)" Dodge Charger, Vehicle Identification Number ("VIN") # 2B3KA53H96H147735.

meaning of what the “third store” meant. If it were a legitimate meeting, code talk would not be needed as they would normally give the exact location of 8th and Woodland where the third store is located or the name of the store.

97. On March 5, 2013, at approximately 3:39 pm, law enforcement intercepted a call between Pulliam and Wiles. During this call, Pulliam told Wiles that “what I about to say....in a minute it going to be Jets.” Wiles responded “say it again?” Pulliam then said again “in a minute it going to be Jets.” Wiles then told Pulliam that he was going to be back (from the Poconos) in “three hours, four hours.” Pulliam then stated “but if it ain’t nothing then make the call or something” and “it’s over now, it’s the last one out now so if you want you can make the call and see what’s up.” Wiles responded “alright.” I believe this call pertains to Pulliam notifying Wiles that the drug set was just about out of their heroin (“Jets”) supply. Pulliam then asked Wiles to make a call (“see what’s up”) so that they could start the process of being resupplied.

98. On March 5, 2013, at approximately 3:58 pm, (approximately 17 minutes after Pulliam told Wiles to make the call) law enforcement intercepted a call from Wiles to Jackson. Wiles said, “Yo, bro. Hey, yo, I’m on my way back and shit but all that shit, like, dinner’s done so as soon as I get back I’m going to call you. I’m probably like going to be like two hours, though.” Jackson replied, “Alright.” I believe that Wiles was informing Jackson that his heroin supply was out and that he would need Jackson to resupply him.

99. On March 5, 2013, at approximately 6:38 pm, law enforcement intercepted a call from Wiles to Jackson. Wiles said, “I’m about to be by the third store.” Jackson

replied, "Alright." I believe that Wiles was indicating to Jackson to meet him at the third store to consummate the narcotic deal.

100. On March 5, 2013 at approximately 6:40 pm, law enforcement intercepted a call from Wiles to Mims. During this call, Wiles asked Mims where he was and Mims responded that he was on "7th about to go holler at Marty" (Randall). Wiles told Mims that he was going to meet Mims "up there" and to "have all the shit ready." I believe this call pertains to Wiles telling Mims to get the money from the sale of the CDS ready in preparation for Wiles to meet with Jackson.

101. In response to the above phone calls, law enforcement surveillance responded to the area of 8th and Woodland Avenue. At approximately 6:50 pm, a gray Cadillac XTS sedan was observed parked on the North West corner of 8th and Woodland Avenue, in the vicinity of the Union Urena Market, 759 Woodland Avenue, Camden, New Jersey. At approximately 6:55 pm, surveillance observed the black Chevrolet Impala with Maine registration 2278SY, known to be utilized by Wiles, parked on Woodland Street, near the Cadillac. At approximately 7:11 pm, surveillance observed Wiles walk from the area of the Cadillac, enter the black Impala, and depart from the area. I believe that the fact that both Wiles and Jackson used the term "third store," rather than the name of the store or the address, indicates they were attempting to conceal the exact location of where they were meeting, which lends credence to the fact that they were doing something illegal. It is believed that Wiles and Jackson met to consummate a narcotics deal.

102. On March 5, 2013, at approximately 7:52 pm, law enforcement intercepted a call to Wiles from Jackson. Jackson said, "Hey, yo. I ain't, I ain't worrying about it, but

it was, it, it was off.” Wiles replied, “What? Let me know.” Jackson replied, “One, one thirty.” Wiles said, “Alright. I’m gonna snatch that shit, ah, from him.” Jackson replied, “Alright.” Wiles said, “Alright. So that mean, I gotta count, I gotta count mine, I gotta count mine, too.” Jackson said, “Oh, alright. Yeah. It’s yeah, it’s, the other thing I said. I ain’t, you know what I mean. It ain’t no big deal. You know what I’m saying? I just now got done. It was, it was wrong. It was just 130 off.” I believe that Jackson called Wiles to inform him that the money Wiles paid Jackson during the narcotic deal was short \$130. I further believe that Jackson supplied Wiles a quantity of heroin.

103. On March 6, 2013, law enforcement intercepted multiple telephone calls between Wiles and Jackson where they discussed a “jawn.” At the time, law enforcement believed that the calls pertained to Wiles and Jackson meeting up for a transaction. In response to these telephone calls, law enforcement surveillance responded to the area of 8th Street and Woodland Avenue. At approximately 5:52 pm, the black Chevrolet Impala, Maine registration 2278SY known to be utilized by Wiles, was observed parked on Woodland Avenue, directly in front of the Union Urena Market. At approximately 5:55 pm, surveillance observed what he believed to be a gray Dodge Charger sedan, New Jersey registration H31CXJ, driving west on Woodland Avenue, cross over 8th Street, and park directly behind Wiles’ Impala.²³ Surveillance observed Wiles exit the driver’s door of the Impala and enter the passenger door of the Dodge. At approximately 6:05 pm, Wiles was observed by law enforcement exiting the Dodge. He re-entered the Impala and both vehicles departed the area.

23 According to the New Jersey Department of Motor Vehicles, license plate H31CXJ is registered to a 2006 Dodge Charger, VIN# 2B3KA53H96H147735, under the name Carlene Forrest. The VIN number is the same as that of the Dodge Sedan operated by Keith Jackson on February 28, 2013, as documented by the Camden police and referenced in paragraph 96.

104. On March 7, 2013, at approximately 10:40 am, law enforcement intercepted a text message conversation from Wiles' to Jackson. Wiles sent "Wuts gon on bro" and Jackson responded "He told me by 5" I believe that Wiles was asking Jackson for an amount of heroin and Jackson was informing Wiles that his supplier would not be ready until 5:00 pm.

105. In response to this text string, law enforcement surveillance responded to Lakeshore Drive and Denfield Street in an attempt to locate Jackson. At approximately 5:05 pm, surveillance drove north on the 1300 block of Lakeshore Drive and observed the Dodge Charger, New Jersey registration H31CXJ (the same vehicle observed on March 6th meeting with Wiles), parked on the same block. Jackson was observed talking with a group of males loitering on the side walk. The surveillance unit parked in close proximity to where Jackson was standing. At approximately 5:10 pm, the Charger was observed driving at a high rate of speed east on Fairview Street out of the area. Surveillance was terminated at this point.

106. On March 7, 2013, at approximately 5:16 pm, law enforcement intercepted a call between Wiles and Jackson. Jackson asked, "Remember when me and you was in the car, right? And remember I was like, oh, man, watch that mother fucking Mazda, watch that mother fucking gold car that keeps riding by with that dude with the hoody on, remember I said that?". Wiles replied, "Yeah." Jackson said, "Alright, that, he them boys, man...Hell yeah. Well he keeps coming around here, you know what I mean. These mother fuckers, he, he keeps trying to park up on, on the side street." I believe that Jackson was calling Wiles to inform him that he spotted surveillance officers and more specifically referenced the day prior during the meeting between Wiles and

Jackson. It should also be noted that the surveillance vehicle being driven by the surveillance officer was gold in color on both nights.

107. On March 7, 2013, at approximately 7:07 pm, law enforcement intercepted a call from Wiles to Mims. Wiles told Mims to come to "Dey Dey house" because he thought he left his keys there. On March 7, 2013, at approximately 7:47 pm, law enforcement intercepted a call between Randall and Mims. Randall told Mims that he needed "everything." At approximately 8:22 pm, law enforcement intercepted a call from Wiles to Jackson. During this call Jackson told Wiles "I'm trying to get a couple ready for you tonight." Wiles responded "Yeah, at least, any, one will do. Anything bro." Law enforcement intercepted a call from Jackson to Wiles at 9:06 pm. During this call Wiles told Jackson to come by "the office," a reference to the management office in the CBA that is directly next to 811 Olive Street. At approximately 9:16 pm, law enforcement intercepted a call from Jackson to Wiles. Jackson told Wiles that he was pulling up now. Approximately one minute later, law enforcement intercepted a call from Wiles to Mims. Wiles asked "where this nigga at?" Mims then gave the phone to Pulliam and Wiles asked Pulliam where he was. Pulliam responded that he was at "Dey crib." Wiles then told Pulliam that he was "about to bring this to you right now."

108. I believe all these calls and texts on March 7, 2013 pertain to Wiles needing more heroin from Jackson. Initially, Jackson told Wiles that it would be by "5, " a reference to 5:00 pm. At 8:22 pm, Jackson was telling Wiles that he was trying to get a couple ready for Wiles. I believe this is a reference to a couple bundles of heroin. Immediately after Wiles met with Jackson (by the CBA office) Wiles told Pulliam that he was bringing "this," believed to be the heroin from Jackson to him at "Dey crib." As

previously noted, "Dey Crib" (811 Olive Street) is the stash house used by the DTO within the CBA.

109. On March 18, 2013 at approximately 12:50 pm, law enforcement intercepted a call from Wiles to Jackson. Wiles asked Jackson "Yo bro you around?" Jackson replied "yeah." Wiles responded "Alright ah...where you at so I can get with you." Jackson responded by saying "Ah..i'm about to um...back to back to come down coming down 9th Street now but I'm coming from downtown." Wiles told Jackson "Alright I'm gonna be I'm gonna go by the third store." Jackson responded "Alright." I believe that Wiles and Jackson were agreeing to meet to consummate a narcotic deal. Furthermore, the coded talk of Wiles wanting to meet Jackson by the third store has been previously determined by surveillance to be at the corner store of 8th and Woodland Streets, Camden, New Jersey.

CONCLUSION

Wherefore, your Affiant submits that there is probable cause to believe that the members of the conspiracy described above, from in or about January 2012 and continuing through in or about April 2013, in Camden County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with others in violation of Title 21, United States Code, Sections 846, and Title 18, United States Code Section 2 to distribute and to possess with intent to distribute 280 grams or more of a mixture or substance described in Title 21 U.S.C., Section 841(b)(1)(B)(ii)(II) containing cocaine base, a Schedule II drug controlled substance, contrary to the

provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii) and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I drug controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(i) and a detectable amount of cocaine, a Schedule II drug controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).