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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	<b>CRIMINAL COMPLAINT</b>
	:	
v.	:	
	:	
QUADAIR WILLIAMS,	:	
a/k/a "Fed Baby,"	:	
a/k/a "Mega,"	:	
JAMAL RICKS,	:	Hon. Cathy L. Waldor
a/k/a "Bop,"	:	
RAHJOHN LEARY,	:	
a/k/a "Rah,"	:	
RONALD TAYLOR,	:	Mag. No. 23-9249
a/k/a "Fat Cat,"	:	
a/k/a "Cat,"	:	
MALACHI FIELDS,	:	
a/k/a "Chicago,"	:	
MARQUIS TURNER,	:	
a/k/a "June Bug,"	:	
PRINCE CARTER,	:	<b><u>FILED UNDER SEAL</u></b>
a/k/a "Eighty,"	:	
a/k/a "Eight,"	:	
TERRANCE DRAKEFORD,	:	
XAVIER CLASSEN,	:	
a/k/a "Swaggy,"	:	
QUAJAMIR PRICE,	:	
a/k/a "Porkchop,"	:	
JAMAH GODWIN,	:	
TROY BLAIR,	:	
ELTON BAKER,	:	
JUSTIN CARLOS,	:	
a/k/a "Spaz," and	:	
MARECIUS SAMUELS,	:	
a/k/a "Re-Up"	:	

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

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this criminal complaint is based on the following facts:

**SEE ATTACHMENT B**

/s/ Thomas Gilbride  
Thomas Gilbride, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Thomas Gilbride, Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 27<sup>th</sup> day of June 2023.

/s/ Cathy L. Waldor  
Hon. Cathy L. Waldor, U.S.M.J.

**ATTACHMENT A**

**COUNT ONE**

**(Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled Substances)**

From at least as early as in or around January 2021 through in or around June 2023, in Passaic County, in the District of New Jersey and elsewhere, defendants,

**QUADAIR WILLIAMS,  
a/k/a “Fed Baby,”  
a/k/a “Mega,”  
JAMAL RICKS,  
a/k/a “Bop,”  
RAHJOHN LEARY,  
a/k/a “Rah,”  
RONALD TAYLOR,  
a/k/a “Fat Cat,”  
a/k/a “Cat,”  
MALACHI FIELDS,  
a/k/a “Chicago,”  
MARQUIS TURNER,  
a/k/a “June Bug,”  
PRINCE CARTER,  
a/k/a “Eighty,”  
a/k/a “Eight,”  
TERRANCE DRAKEFORD,  
XAVIER CLASSEN,  
a/k/a “Swaggy,”  
QUAJAMIR PRICE,  
a/k/a “Porkchop,”  
JAMAH GODWIN,  
TROY BLAIR,  
ELTON BAKER,  
JUSTIN CARLOS,  
a/k/a “Spaz,” and  
MARECIUS SAMUELS,  
a/k/a “Re-Up”**

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

(b)(1)(C), a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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

**COUNT TWO**

**(Possession of a Firearm and Ammunition by a Convicted Felon)**

On or about March 16, 2023, in Passaic County, in the District of New Jersey and elsewhere, defendant,

**MARQUIS TURNER,  
a/k/a "June Bug,"**

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a Kel-Tec PMR-30 semi-automatic .22 caliber handgun, bearing serial #WXXJ40, which was equipped with a high-capacity magazine and loaded with 30 rounds of .22 caliber ammunition.

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

**COUNT THREE**  
**(Possession with Intent to Distribute Fentanyl)**

On or about March 16, 2023, in Passaic County, in the District of New Jersey and elsewhere, defendant,

**MARQUIS TURNER,**  
**a/k/a “June Bug,”**

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOUR**  
**(Possession of a Firearm During and  
in Relation to a Drug Trafficking Crime)**

On or about March 16, 2023, in Passaic County, in the District of New Jersey and elsewhere, defendant,

**MARQUIS TURNER,**  
**a/k/a “June Bug,”**

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the Possession with Intent to Distribute Fentanyl charged in Count Three of this Complaint, did knowingly use and carry a firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT FIVE**  
**(Conspiracy to Possess a Firearm During and  
in Relation to a Drug Trafficking Crime)**

On or about April 25, 2023, in Passaic County, in the District of New Jersey and elsewhere, defendant,

**QUAJAMIR PRICE,  
a/k/a “Porkchop,”**

did knowingly and intentionally conspire and agree with others, both known and unknown, to use and carry a firearm during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, the Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances charged in Count One of this Complaint.

In violation of Title 18, United States Code, Section 924(o).



## **ATTACHMENT B**

I, Thomas Gilbride, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives ("ATF"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, recordings, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Where I refer to the contents of previously recorded conversations (e.g., consensual recordings or prior wiretap interceptions), quotations and descriptions are based on preliminary draft transcripts of those conversations. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date or time, I am asserting that it took place on or about the date or time alleged.

### **Background of the Investigation**

1. Since at least in or around January 2021, the ATF, along with state and local law enforcement agencies, have been investigating members and associates of the UpTop gang ("UpTop," or the "DTO"), a neighborhood-based street gang involved in the distribution of controlled substances in and around the city of Paterson, New Jersey, and its members and associates, who include Quadair Williams, a/k/a "Fed Baby," a/k/a "Mega," ("WILLIAMS"), Jamal Ricks, a/k/a "Bop," ("RICKS"), Rahjohn Leary, a/k/a "Rah," ("LEARY"), Ronald Taylor, a/k/a "Fat Cat," a/k/a "Cat," ("TAYLOR"), Malachi Fields, a/k/a "Chicago," ("FIELDS"), Marquis Turner, a/k/a "June Bug," ("TURNER"), Prince Carter, a/k/a "Eighty," a/k/a "Eight," ("CARTER"), Terrance Drakeford ("DRAKEFORD"), Xavier Classen, a/k/a "Swaggy," ("CLASSEN"), Quajamir Price, a/k/a "Porkchop," ("PRICE"), Jamah Godwin ("GODWIN"), Troy Blair ("BLAIR"), Elton Baker ("BAKER"), Justin Carlos, a/k/a "Spaz," ("CARLOS"), Marecius Samuels, a/k/a "Re-Up" ("SAMUELS"). The investigation has shown that the DTO distributes controlled substances including, but not limited to, heroin, fentanyl, and cocaine.

2. During the investigation, law enforcement obtained multiple Court Orders authorizing the interception of wire and electronic communications occurring over multiple cellular telephone devices used in furtherance of the DTO's activities. As set forth throughout this Criminal Complaint, these wiretaps, in conjunction with mobile and fixed surveillance, lawful seizures, and controlled narcotics purchases, among other investigative techniques, have revealed the operational structure and inner workings of the DTO and the method and means by which it carried out its narcotics-trafficking conspiracy.

3. These law enforcement techniques have revealed that the DTO operates primarily in and around Governor and Carroll Streets, as well as in and

around the Incca Village housing complex (the “Incca Village”), and Harrison Street between Rosa Parks Boulevard and Carroll Street, all within the city of Paterson (the “UpTop Area”). Within the UpTop Area, members and associates of the DTO control the sale of heroin, fentanyl, and crack cocaine, working together to sell drugs and protect the area from rival drug dealers and rival neighborhood street gangs, including through the possession of firearms and acts of violence.

4. At all times relevant to this Complaint, and based on wiretaps, physical surveillance, and controlled purchases, among other investigative techniques, law enforcement learned that WILLIAMS, RICKS, LEARY, TAYLOR, FIELDS, TURNER, CARTER, DRAKEFORD, CLASSEN, PRICE, GODWIN, BLAIR, BAKER, CARLOS, and SAMUELS are all members and associates of UpTop, and are all involved in the trafficking of narcotics within Paterson, New Jersey, and elsewhere. RICKS and LEARY are high-ranking members of UpTop. As such, they sometimes utilize “runners,” or more junior members of the DTO to deliver narcotics to the DTO’s customers. When running low on their supply of drugs to distribute, or in need of a particular type of heroin and/or fentanyl, RICKS and LEARY often ask other members of the DTO to resupply them with drugs or to set aside quantities of drugs that RICKS and LEARY would then sell to customers. Because the co-conspirators are all working toward the common goal of controlling the sale of drugs in the UpTop Area, more senior members of the DTO, including RICKS and LEARY, also sometimes resupply more junior members with drugs to distribute and assist more junior members in distributing drugs.

5. As detailed below, the investigation has also shown that WILLIAMS is a close associate of senior members of UpTop, including RICKS and LEARY, and a source of supply for the DTO. As further laid out below, WILLIAMS conspired with senior members of UpTop, including RICKS and LEARY to distribute narcotics in and around the UpTop Area. The investigation has also shown that WILLIAMS obtained and distributed heroin and/or fentanyl, as well as cocaine base and/or crack cocaine.

6. Additionally, the investigation has revealed that certain members and associates of UpTop, including TURNER and PRICE, use and possess firearms in furtherance of the DTO’s sale of narcotics. Specifically, members and associates of UpTop, including TURNER and PRICE, use and possess firearms to protect the DTO’s control of the UpTop Area and secure the gang’s position as the primary drug supplier in the UpTop Area.

***Packaging of Heroin and/or Fentanyl for Distribution and Slang Used by UpTop in Connection with Drug Distribution***

7. The investigation has revealed that while carrying out their conspiracy to distribute narcotics, members and associates of UpTop typically

package the drugs for distribution in particular ways and charge prices that depend on who the customer is. The DTO also uses slang or informal terms when discussing the conspiracy.

8. For example, the investigation has revealed that members and associates of UpTop purchase and sell heroin that is frequently mixed with fentanyl, a potent, synthetic opioid that is approximately 50 times stronger than heroin. The DTO also frequently sells quantities of what customers believe is heroin but is, in fact, a mixture that contains fentanyl but no heroin. UpTop typically packages and distributes one dose of heroin and/or fentanyl in a glassine envelope, which is in turn packaged together with other glassines in larger quantities. The glassines are commonly sold by UpTop in “bundles” and “bricks.” In Paterson, a “bundle,” also referred to as a “bun,” commonly refers to approximately ten glassines of heroin and/or fentanyl, grouped together. A “brick” commonly refers to approximately 50 glassines of heroin and/or fentanyl, often packaged as five bundles that have been grouped together.

9. As detailed below, members and associates of UpTop often refer to a brick of heroin and/or fentanyl as a “movie” or a “play.” Based on the investigation to date, the DTO typically sold a brick of heroin to a customer for approximately \$80 to \$100. The investigation has further shown that when selling heroin and/or fentanyl to other members of the DTO or to close associates of the DTO, the price of a brick is cheaper, often in the \$50 to \$60 range. Based on my training and experience investigating narcotics offenses, I know these prices to be consistent with the street prices of heroin and/or fentanyl.

10. The investigation has further revealed that the heroin and/or fentanyl that the DTO purchases and sells is almost always stamped or labeled in colored ink, which act as brand names for the drugs. These “stamps” or brand names allow the dealers to differentiate and market batches of heroin and/or fentanyl. At various times relevant to this Criminal Complaint, as described herein, the DTO sold glassine envelopes containing heroin and/or fentanyl that were stamped “Fireball,” “Lebron James,” “FedEx,” “Empire,” “Dolce,” “Nike,” “Love,” “Ninja Turtle,” “Barry Bonds,” and “Blue Magic,” among other stamps. The investigation also revealed that the DTO sometimes obtains and sells heroin and/or fentanyl that is packaged and stamped as described above, but is then wrapped in the paper from used lottery tickets. Members of the DTO and customers refer to that heroin and/or fentanyl as “Lottery,” which itself is not a stamp but a reference to the lottery paper in which the drugs are wrapped. At various times relevant to the Criminal Complaint, and as detailed below, customers sometimes requested “Lottery” without specifying a particular stamp, while at other times requested “Lottery” while specifying a particular stamp.

11. Based on the investigation to date, and as detailed below, members and associates of UpTop typically refer to the purchasers of the drugs being distributed by the DTO as “Js,” which is a shorthand reference to a “junkie.”

**MEMBERS AND ASSOCIATES OF UPTOP WORK TOGETHER  
TO CONTROL THE DRUG TRADE IN THE UPTOP AREA**

12. The investigation has shown that within the UpTop Area, members and associates of the DTO are heavily involved in the distribution of controlled substances, to include heroin, fentanyl, and cocaine. Often, and as detailed below, multiple members and associates of UpTop work together to distribute these narcotics. For example, one member may arrange for the sale, sending the buyer to a second member and associate of the DTO who actually provides the controlled substances to the buyer. Additionally, UpTop gang members sometimes work as “lookouts” for other gang members, to ensure that law enforcement is not in the vicinity while other members distribute controlled substances.

13. For example, on or about September 13, 2022, local law enforcement arrested RICKS and PRICE in connection with their involvement in the distribution of suspected heroin in the UpTop Area. Specifically, law enforcement observed RICKS and PRICE involved in multiple sales of suspected narcotics near a building located at 43-45 Carroll Street (“43-45 Carroll”), which is located in the UpTop Area. One of those drug transactions occurred at approximately 5:53 p.m., at which time RICKS and PRICE were observed together speaking with and then directing an unknown male (“UM1”) to the rear of 43-45 Carroll where three other members and associates of UpTop engaged in a drug transaction with UM1. Law enforcement followed UM1 and stopped him at approximately 5:58 p.m. During the stop, law enforcement recovered approximately eight glassines of suspected heroin. Upon arrest, PRICE was found with \$489 and RICKS was found with approximately \$540 in U.S. currency.

14. The investigation has also shown, and as laid out in more detail below, that members and associates of UpTop frequently provide drugs to each other in furtherance of the larger conspiracy to distribute drugs in and around Paterson, New Jersey.

15. For example, on or about April 8, 2021, local law enforcement arrested FIELDS and TAYLOR in connection with their possession of suspected heroin and cocaine intended for distribution. Specifically, at approximately 6:34 p.m., law enforcement observed a white BMW (the “BMW”) double parked next to a black Toyota Camry (the “Camry”). Law enforcement observed the driver of the BMW, later identified as FIELDS, begin to hand suspected narcotics to the driver of the Camry, later identified as TAYLOR. After observing this interaction, law enforcement drove toward the two vehicles, at which time FIELDS stopped attempting to pass the suspected drugs to TAYLOR. Law enforcement stopped both cars and arrested FIELDS and TAYLOR. During a search of FIELDS and the BMW, law enforcement recovered approximately five bricks of what later testing determined was a substance and mixture containing fentanyl. FIELDS

was also found with 45 vials of suspected crack cocaine and \$1,775 in U.S. currency. During a search of TAYLOR and the Camry, law enforcement found a baggie containing suspected cocaine in TAYLOR's sock and approximately \$2,646 in U.S. currency.

**RICKS AND LEARY DISTRIBUTE NARCOTICS IN PATERSON, NEW JERSEY**

16. The investigation has revealed that LEARY and RICKS often receive telephone calls from individuals seeking to purchase heroin. At certain times relevant to the Complaint, RICKS and LEARY completed the transactions themselves. For example, on or about April 19, 2023 at approximately 2:50 p.m., LEARY received a call from an individual ("Customer-1") known to law enforcement who was seeking to purchase heroin from LEARY. Specifically, an excerpt of the call between LEARY and Customer-1 is included below:

Customer-1: Um, I'm heading out anyway.

LEARY: Aight. You want the FedEx?

Customer-1: Uh, let's see um . . . gee, how about the other ones?

LEARY: What about the Fireball or the Lebron James?

Customer-1: No, I don't want the Fireball. Can you, you mix them up? Is that possible? Will that screw you up?

LEARY: Not really, which one? The Lebron? Yeah, yeah, uh... uh...

Customer-1: If you can mix them up that would be good, if not either one 'em is fine.

LEARY: Alright, okay. I got you.

Customer-1: Alright, It'll take me like 15 minutes.

LEARY: Alright.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that LEARY's references to "Fireball," "Lebron James," and "FedEx," were references to different stamps of heroin and/or fentanyl that LEARY had available for sale. I further believe that

LEARY was agreeing to sell Customer-1 a mixture of the “Fireball” and “Lebron James” heroin and/or fentanyl.

17. Approximately 17 minutes later, Customer-1 texted LEARY, saying “At Gov and straight walking up.” Just seconds later, LEARY responded, “I see u.” Based on the investigation to date and my knowledge of the UpTop Area, I believe that the word “Gov” is a reference to Governor Street, which is a street in Paterson, New Jersey within the UpTop Area. I further believe that these text messages reflect the location of the narcotics transaction that occurred between LEARY and Customer-1.

18. The investigation has also revealed that RICKS completed certain drug transactions himself. For example, on or about May 18, 2023, RICKS sold approximately seven bricks of suspected heroin, including approximately one brick of heroin stamped “Empire” and approximately six bricks of heroin stamped “FedEx” to an individual known to law enforcement (“Customer-2”). Following this drug transaction, Customer-2 was arrested by law enforcement and found with the suspected heroin.

19. Specifically, RICKS and Customer-2 arranged the drug transaction via text message, with Customer-2 texting RICKS at approximately 1:27 p.m.: “I want 1 of empire and 6 of the prestamp.” Based on my training and experience investigating narcotics offenses, the contents of these texts and other communications, and the results of the investigation to date, I believe that Customer-2 was requesting seven bricks of heroin and that “prestamp” was a reference to purchasing heroin that had not yet been stamped with a particular label. Based on my training and experience investigating narcotics offenses, I know that some purchasers of narcotics prefer to purchase heroin that is not stamped because the purchaser wants to resell the heroin using their own unique stamp.

20. At approximately 2:01 p.m., RICKS provided Customer-2 with an address on Lafayette Street in Paterson, New Jersey, with Customer-2 responding “Here” at approximately 2:10 p.m. At approximately 2:21 p.m., RICKS texted Customer-2 “Walk-in to u.” Approximately nine minutes later, following the suspected drug transaction between RICKS and Customer-2, Customer-2 texted RICKS, stating “[w]hat happened to the prestamp ones?” and “I think this FedEx is that knock u outs\*\*t.” Based on my training and experience investigating narcotics offenses, the contents of these text messages and other communications, and the results of the investigation to date, including Customer-2’s subsequent arrest, I believe that Customer-2 and RICKS had completed the drug transaction and that despite Customer-2’s request for “prestamp” heroin, RICKS had sold “FedEx” heroin to Customer-2.

21. At approximately 2:39 p.m., law enforcement followed and then pulled over a car being driven by Customer-2. A K9 officer was called to the

scene and detected the presence of an illegal substance, at which point the vehicle was searched. Inside the vehicle law enforcement found suspected heroin stamped “FedEx” in blue ink and other suspected heroin stamped with a picture of the Empire State Building in blue ink. Subsequent testing showed the suspected heroin was in fact a mixture containing a detectable amount of fentanyl.

22. RICKS completed another drug transaction on or about April 18, 2023. On that date, at approximately 6:30 p.m., RICKS received a telephone call from an individual known to law enforcement (“Customer-3”) who was seeking to purchase heroin from RICKS. Specifically, the two had the following exchange:

RICKS: What's up [Customer-3]?

Customer-3: Hey, are you good?

RICKS: Yeah.

Customer-3: You got, can you do a movie of, um, Fireball?

RICKS: Yeah.

Customer-3: Okay, I'll see- I'm gonna call you in like a half hour. Okay?

RICKS: A'right.

Customer-3: A'right.

After agreeing on a location for the heroin transaction, RICKS called Customer-3 and said “I see you parked. I’m walking to you right now,” with Customer-3 responding “Okay, okay thank you.” After the transaction, Customer-3 sent a text message to RICKS that stated “[y]ou gave me Lebron.” Based on my training and experience investigating narcotics offenses, the investigation to date, including the above-referenced communications between RICKS and Customer-3, I believe that Customer-3 was telling RICKS that RICKS had sold Customer-3 a different type of heroin and/or fentanyl than they agreed upon. Specifically, on the 6:30 p.m. telephone call, the two discussed Customer-3 purchasing heroin and/or fentanyl labeled “Fireball,” but RICKS apparently sold Customer-3 heroin and/or fentanyl stamped “Lebron James.”

**BLAIR, CARTER, BAKER, FIELDS, AND SAMUELS ASSIST  
RICKS AND LEARY IN DISTRIBUTING NARCOTICS**

23. While RICKS and LEARY often received requests to purchase drugs over their phones and then completed the corresponding drug sales themselves,

at certain times relevant to the Complaint, RICKS and LEARY asked more junior members of the DTO to sell to customers who had called RICKS or LEARY to place an order. In those situations, RICKS or LEARY often coordinated the transaction by phone, with the more junior member of the DTO physically completing the drug sale.

24. For example, on or about April 8, 2023 at approximately 1:03 p.m., RICKS called BLAIR and told him that he had a customer interested in purchasing heroin, with BLAIR agreeing to complete the drug deal. Specifically, the two had the following exchange:

RICKS: Yo!

BLAIR: Yeah, I'm in the house-wha, what, what's up?

RICKS: Nah, you got uh, um...you got Fireball?

BLAIR: Yeah.

RICKS: I got a, uh, it's a J, right here in the Cut that want a movie for 90.

BLAIR: Aight.

RICKS: The little white girl and the white dude.

BLAIR: Aight. I'm about to come over.

RICKS: Aight. Bet.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that RICKS was asking BLAIR if he had "Fireball" heroin and/or fentanyl because RICKS had a customer in the UpTop Area interested in purchasing a brick of heroin for \$90. Specifically, I believe that RICKS' reference to "Fireball" was a reference to the type of heroin and/or fentanyl his customer was interested in purchasing and that the reference to the "J," or customer, wanting a "movie for 90" was RICKS telling BLAIR that the customer wanted to purchase a brick, or 50 glassines, of heroin and/or fentanyl for \$90. Based on my training and experience, and as discussed above, \$90 is consistent with the market price for a brick of heroin in Paterson, New Jersey, which demonstrates that the term "movie" is in fact a slang term of the DTO's for a brick of heroin and/or fentanyl. I further believe that the "J" being "here in the Cut," was a reference to a location within the Incca Village where law enforcement knows the DTO frequently sells drugs to customers.



25. Approximately three minutes after the above-referenced call between RICKS and BLAIR, law enforcement observed BLAIR approach an unknown male (“UM2”) and an unknown female in the UpTop Area and engage in what law enforcement believes was a hand-to-hand drug transaction with UM2.

26. Similarly, on or about, April 10, 2023, RICKS called CARTER and told him to sell narcotics to an individual driving a grey Mercedes-Benz. Specifically, at approximately 1:31 p.m. on April 10, 2023, the two had the following exchange:

RICKS: Yo, where you at, Eight?

CARTER: I was about to jump in the shower. Why what happened?

RICKS: Somebody want a 20 right here on the corner.

CARTER: Aight, tell them to meet me right here.

RICKS: They right there-it’s a gray Benz.

CARTER: Aight.

Based on the investigation to date, I know CARTER’s nickname is “Eighty.” I believe that RICKS’ reference to “Eight” was a shorthand for that nickname.

27. Approximately three minutes later, at approximately 1:34 p.m., law enforcement observed CARTER walk out of 43-45 Carroll, an apartment building in the UpTop Area referenced above, and approach a gray Mercedes-Benz. Law enforcement then observed CARTER pass suspected narcotics through the window of the Mercedes-Benz, with the individual inside of the car passing CARTER what appeared to be United States currency.

28. The investigation has shown that BAKER also often served UpTop customers at the request of other members and associates of the DTO. For example, on or about April 20, 2023 at approximately 9:32 a.m., LEARY contacted BAKER<sup>1</sup> about having BAKER sell heroin and/or fentanyl to one of LEARY’s customers. At that time, the two had the following exchange:

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<sup>1</sup> Law enforcement knows that BAKER was the individual on the call with LEARY based on surveillance conducted throughout the investigation in conjunction with the wire intercepts. For example, on or about May 10, 2023, at approximately 3:34 p.m., LEARY called the phone number associated with BAKER and asked the person on the phone to sell narcotics to an individual in

BAKER: Yo.

LEARY: Hey, where you at, bruh?

BAKER: Hallway – watch that surveillance up there.

LEARY: I ain't outside, bruh. My J about to come.

BAKER: He on foot, or walk, or car?

LEARY: A car.

BAKER: Tell him to park on Summer Street.

LEARY: Aight.

Approximately 15 minutes later, at approximately 9:47 a.m., LEARY texted BAKER saying “he there.” BAKER responded by asking what color car the customer was in, with LEARY stating that the customer was in a black car. BAKER then asked LEARY via text message “[w]at he need?” LEARY responded that the customer needed a “bun,” or bundle, which, as explained above is approximately 10 glassines of heroin and/or fentanyl. At approximately 9:55 a.m., BAKER texted LEARY “All good.” Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communications and other communications, and the results of the investigation to date, I believe that when BAKER texted LEARY “[a]ll good,” BAKER was stating, and LEARY understood him to mean, that BAKER had completed the sale of heroin and/or fentanyl to LEARY’s customer.

29. Additionally, FIELDS served as a runner for other members of the DTO, including LEARY. For example, on or about April 27, 2023 at approximately 9:10 a.m., an unknown individual spoke with LEARY on the telephone and asked to purchase heroin with the “Lebron James” stamp. LEARY told the individual that he was at work but said “let me see if my man can meet you.” Approximately one minute later, LEARY called FIELDS<sup>2</sup> and asked FIELDS to sell a “play,” or brick of heroin and/or fentanyl, to one of LEARY’s customers while LEARY was at work. On that call, FIELDS agreed to sell the brick of heroin

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a black Toyota Camry. At approximately 3:35 p.m., law enforcement observed BAKER approach the driver of a black Toyota Camry.

<sup>2</sup> Law enforcement knows that FIELDS was the individual that LEARY called because the phone number that LEARY called matched the phone number that an undercover officer used to communicate with FIELDS during a controlled purchase of narcotics, which is further detailed below.

and/or fentanyl to the customer, providing LEARY with an address on Lawrence Avenue in the UpTop Area where the customer could meet him.

30. When the customer arrived at the agreed-upon location, at approximately 10:11 a.m., LEARY called FIELDS and told him that the customer had arrived and was ready to purchase the drugs. Specifically, the two had the following exchange:

FIELDS: Yo.  
LEARY: He is there, bro.  
FIELDS: That Range Rover?  
LEARY: Yeah.  
FIELDS: Aight, bet.  
LEARY: Lebron.  
FIELDS: Lebron?  
LEARY: Yeah.  
FIELDS: Aight, bet.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communications and other communications, and the results of the investigation to date, I believe that when LEARY stated “[h]e is there,” LEARY was telling FIELDS that the customer had arrived at the agreed-upon location for the drug transaction, and that when FIELDS asked “[t]hat Range Rover,” he was asking LEARY what type of car the customer was driving. I further believe that the references to “Lebron” were LEARY and FIELDS confirming what stamp of heroin and/or fentanyl the customer wanted to purchase.

31. Approximately one minute later, at approximately 10:12 a.m., LEARY called FIELDS and told FIELDS to “take 70.” Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that when LEARY said “take 70,” he was telling FIELDS to keep \$70 in profits for selling the narcotics to LEARY’s customer.

32. SAMUELS also frequently served as a runner for LEARY and regularly spoke with LEARY on the phone, as reflected on the wire intercepts.<sup>3</sup>

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<sup>3</sup> Law enforcement knows that SAMUELS was the individual on those calls with LEARY based on surveillance conducted in conjunction with various wire

For example, on or about April 21, 2023, at approximately 6:12 p.m., LEARY and SAMUELS had a call about SAMUELS selling drugs to two of LEARY's customers. Specifically, the two had the following exchange:

LEARY: Yo.

SAMUELS: Hey yo. So you only want me to just get one?

LEARY: I'm saying, my J is only coming for a movie right now. So I don't know.

SAMUELS: Nah, I'm just saying 'cause I know your s\*\*t maybe still ringing and you might be gone.

LEARY: Yeah, fact! Fact! Well the other n\*\*\*a, he definitely told me he's supposed to be coming. Let me see if he's coming cause one of them is coming for two bundles.

SAMUELS: Aight let me know and I'll grab two.

LEARY: I'm about to call him right now.

SAMUELS: Aight.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communications and other communications, and the results of the investigation to date, I believe that when LEARY stated "my J is only coming for a movie right now," he was telling SAMUELS that one customer wanted to purchase one brick of heroin and/or fentanyl. I further believe that when LEARY stated "the other n\*\*\*a, he definitely told me he's supposed to be coming . . . for two bundles," he was telling SAMUELS that another customer wanted to purchase two bundles, or approximately 20 glassines, of heroin and/or fentanyl.

33. Approximately 56 minutes later, at approximately 7:06 p.m., LEARY and SAMUELS had another phone call during which LEARY stated that "the movie J" was 15 minutes away and that "the other one [was] coming for two bundles." Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communications and other

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intercepts. For example, on or about May 21, 2023, at approximately 1:33 p.m., LEARY called the phone number associated with SAMUELS and asked the location of an upcoming drug transaction. The person who LEARY called specified that he would be meeting the customer at a particular gas station in Paterson, New Jersey. At approximately 1:38 p.m., SAMUELS was observed at the gas station engaging in an exchange with an unknown man.

communications, and the results of the investigation to date, I believe that LEARY was confirming with SAMUELS that the two customers from the previous call were still interested in purchasing narcotics.

34. The following day, on or about April 22, 2023 at approximately 9:11 a.m., LEARY called SAMUELS and asked whether SAMUELS “served both of them last night?” SAMUELS responded, “[y]eah.” Based on my training and experience, I believe that SAMUELS was confirming to LEARY that he had sold narcotics to the two customers that LEARY had called SAMUELS about the previous night.

**MEMBERS AND ASSOCIATES OF THE DTO**  
**RESUPPLY EACH OTHER WITH NARCOTICS**

35. Because members and associates of the DTO work together to control the sale of narcotics within the UpTop Area, the investigation has shown that they often ask for and provide each other with narcotics as needed.

**RICKS Resupplies PRICE with Narcotics**

36. For example, on or about March 9, 2023, RICKS provided PRICE with heroin and/or fentanyl for PRICE to then sell to customers. Specifically, at approximately 11:14 p.m., the two had the following exchange:

PRICE:                    You [have] the Lebron s\*\*t?

RICKS:                    No, right now I only got, um, Fireball left.

PRICE:                    Let me get one of those s\*\*ts.

RICKS:                    Where you at?

PRICE:                    In the Villa.

RICKS:                    A’right, come right here. Meet me by the, um, table.

PRICE:                    A’right.

RICKS:                    I’m about to walk right there.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that the references to “Lebron” and “Fireball” were references to the type of heroin and/or fentanyl that RICKS had in his possession at that time. I further believe that PRICE’s reference

to “the Villa,” was a reference to PRICE being in the Incca Village, located in the UpTop Area.

37. Approximately six minutes after this call, law enforcement observed RICKS arrive in the vicinity of Carroll Street near the Incca Village. At that time, RICKS called PRICE and stated: “Bro, Imma leave it in the mailbox, you heard?” Law enforcement then observed RICKS place a small package into a mailbox located on the exterior of a building located on Carroll Street. Soon thereafter, law enforcement observed PRICE exit that same building on Carroll Street and take what appeared to be the same small package out of the mailbox. At approximately 11:22 p.m., just moments after PRICE retrieved the package that RICKS left in the mailbox, law enforcement observed PRICE walk to a nearby section of the Incca Village and engage in a hand-to-hand narcotics transaction with a regular customer of UpTop’s known to purchase heroin and/or fentanyl. From the time that law enforcement observed PRICE exit the building and retrieve the package from the mailbox and the time he engaged in the hand-to-hand narcotics transaction, law enforcement maintained continuous surveillance of PRICE.

***BLAIR Resupplies RICKS***

38. On or about March 18, 2023, at approximately 1:21 p.m., RICKS called BLAIR and told him that he needed additional heroin and/or fentanyl to distribute and told BLAIR that he had money to make the purchase from BLAIR. Specifically, the two had the following exchange:

RICKS: Yo. Are you at the house?

BLAIR: Yeah, I’m at the house.

RICKS: I need, I need, um, I need five lottery and five blue magic.

BLAIR: Aight bet. How soon?

RICKS: I’m about to pull up and I got the money for the other two too.

BLAIR: I’m here.

RICKS: Aight, bet.

BLAIR: I’m right here.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the

investigation to date, I believe that “Lottery,” as explained above, refers to heroin and/or fentanyl that is packaged and then wrapped in lottery paper. I also believe that “Blue Magic” was a stamp of heroin and/or fentanyl sold by UpTop. I further believe that when RICKS told BLAIR that he needed “five lottery” and “five blue magic,” RICKS was stating that he needed five bricks of “Lottery” heroin and five bricks of “Blue Magic” heroin.

39. Approximately five minutes later, at approximately 1:26 p.m., law enforcement observed a vehicle arrive outside of a building located at 156 Governor Street in Paterson (“156 Governor”), which law enforcement believes is where BLAIR lives and which is used by the DTO as a stash house for drugs and other contraband. Law enforcement then observed RICKS exit the vehicle and enter 156 Governor. Approximately two minutes later, RICKS was observed leaving 156 Governor. Based on my training and experience investigating narcotics offenses, the contents of the above-referenced call and other communications, and the results of the investigation to date, I believe that RICKS entered 156 Governor to pick up the heroin and/or fentanyl from BLAIR that the two had discussed over the phone.

#### ***CLASSEN Brings Narcotics to RICKS for RICKS to Sell***

40. On another occasion, through a combination of wire interceptions and physical surveillance, law enforcement observed CLASSEN bring suspected heroin and/or fentanyl to RICKS for RICKS to sell to a customer. Specifically, on or about March 30, 2023, Customer-2, one of RICKS’ regular customers referenced above, texted RICKS: “I’m co.ing [sic] tmrw around 12-12:30.” On or about March 31, 2023, at approximately 11:30 a.m., RICKS called CLASSEN, at a phone number registered to CLASSEN, and the two had the following exchange:

CLASSEN: Yo.

RICKS: Yo. I just got out of the shower.

CLASSEN: Ah, you want me to bring them sh\*\*s?

RICKS: I’m in the shower.

CLASSEN: Aight, call me when you’re done.

RICKS: Aight, I’m about to call her and see what she got right now.

CLASSEN: Aight.

RICKS: Aight.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, including a subsequent drug transaction that occurred between RICKS and Customer-2, I believe that Customer-2 was the person about whom RICKS was referring when he stated, "I'm about to call her and see what she got right now." I further believe that when CLASSEN stated "you want me to bring them sh\*\*s," he was asking, and RICKS understood him to be asking, whether RICKS wanted CLASSEN to bring him narcotics for RICKS to sell to Customer-2.

41. At approximately 11:50 a.m., Customer-2 texted RICKS that she was on her way to meet RICKS, with RICKS telling Customer-2 that she should meet RICKS next to his residence on Atlantic Avenue in Paterson, New Jersey.

42. At approximately 11:58 a.m., law enforcement observed CLASSEN leave his residence and get into a car. Approximately three minutes later, at approximately 12:01 p.m., CLASSEN called RICKS and the two had the following exchange:

RICKS: Yo.

CLASSEN: Yo, what happen?

RICKS: Nah, she said she'll be down in a few I don't know exactly what time about.

CLASSEN: Okay, let me know.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that this further demonstrates that during this time period RICKS and CLASSEN were communicating about CLASSEN assisting RICKS in selling drugs to Customer-2.

43. At approximately 1:14 p.m., law enforcement observed CLASSEN arrive at RICKS's residence on Atlantic Avenue in Paterson, New Jersey.

44. After texting RICKS that she was ready to meet, Customer-2 texted RICKS asking if he could "find anymore blue magic." RICKS texted back saying that "blue magic gon" but that he had "2 dif ones." Customer-2 then agreed via text message to purchase "10, half and half," of the two types of heroin RICKS had in his possession. Based on my training and experience investigating narcotics offenses, the contents of these and other communications, and the results of the investigation to date, I believe that Customer-2 was stating, and RICKS understood her to mean, that she wanted to purchase ten bricks of heroin.





That s\*\*t ain't red stamp. LeBron is red stamp.  
Fireball is green stamp.

SAMUELS: Yeah.

LEARY: Like if you had to come up out and says you got  
fireball red stamp, they don't want that s\*\*t. If I'm  
standing right there with fireball green stamp and  
they say they got fireball red stamp they knocked  
bottom about red stamp.

SAMUELS: Right.

LEARY: Nah, that's a fact!

SAMUELS: That's alright, though.

LEARY: I ain't going to hold you though n\*\*\*a, it's just  
[STAMMERS] Ni\*\*\*s just chilling right now, N\*\*\*a,  
that s\*\*t well that's two, well like two and a half,  
three birds over. So ni\*\*\*s lit. Ni\*\*\*s just waiting  
to mix that s\*\*t together.

SAMUELS: Who that, who that F, F-baby?

LEARY: Well I told you, I told you who I jam with. I don't  
deal with none of the ones that- I told you who I  
am down with.

SAMUELS: No, what I was sayi- I thought you was, I thought  
you called him before.

LEARY: Nah, nah we like- Them was, F-baby one of them  
ni\*\*\*s that like, that like we were one of the first  
ones like with them joints but, when we  
mother\*\*\*\*ing found the thing we was going to  
grab our own s\*\*t, me and Fed. Like we were  
going to put our bands together and go grab like  
300 of them joints, 300 hundred. Just by  
ourselves. It's too many outlets with that s\*\*t  
now. Like everybody can get their hands on that  
s\*\*t.

SAMUELS: Yeah.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that LEARY was bragging to SAMUELS about his relationship with WILLIAMS. Specifically, I know that members and associates of UpTop use the slang term “bird” for kilograms of heroin and/or fentanyl. As such, when LEARY referenced “two and half” or “three birds” that others were going to “mix up,” I believe he was talking about mixing heroin and/or fentanyl for distribution. I further believe that when SAMUELS asked LEARY “who that F, F-baby,” he was asking whether it was WILLIAMS who was mixing the kilogram quantities of heroin and/or fentanyl. When LEARY responded, “I told you who I jam with” and “I told you who I am down with,” I believe he was telling SAMUELS that he and WILLIAMS work together to procure and distribute narcotics. I further believe that when LEARY stated, “we were one of the first ones like with them joints,” he was stating that he and WILLIAMS were two of the first drug dealers in Paterson, New Jersey to obtain and distribute “Fireball” heroin with green-ink stamp. I further believe that when LEARY stated, “we were going to put our bands together and go grab like 300 of them joints, 300 hundred,” he was saying that he and WILLIAMS had intended to pool their money together to purchase 300 bricks of “Fireball” heroin. Based on my training and experience, I know that drug dealers often refer to a stack of currency totaling \$1,000 as a “band.”

50. On or about June 9, 2023, at approximately 10:30 a.m., LEARY had a telephone call with an individual known to law enforcement (“Individual-1”), who is currently incarcerated in federal prison. During that call, LEARY stated that WILLIAMS was the only person who supported LEARY financially when he was released from prison. An excerpt of that telephone conversation is included below.

LEARY: Y’all can’t tell me nothing, like...I came home [AUTOMATED RECORDING: This call is from a Federal Prison] ni\*\*\*s ain’t [Audio fades] n\*\*\*a, I [Audio fades] ni\*\*\*s ain’t [Audio fades] the only n\*\*\*a that really did something for me when I came home was, Fed. I ran it up!

Individual-1: Was who?

LEARY: Was Fed! Was Meg!

Individual-1: Oh Meg! Oh, Fed! Yeah, yeah, yeah, yeah, yeah...at, at-

[Voices overlap]

LEARY: He gave me like, my first day home he gave me like two bands.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that LEARY's reference to when LEARY "came home" was a reference to when he was released from prison in or around August 2022. I further believe that LEARY's reference to "Fed" and "Meg" were references to WILLIAMS, using two of WILLIAMS' nicknames, "Fed Baby" and "Mega." Additionally, I believe the LEARY's reference to WILLIAMS giving him "two bands" on LEARY's "first day home," was a reference to WILLIAMS giving LEARY \$2,000 upon LEARY's release from prison. Based on my training and experience, I know that drug dealers and others participating in illegal activity often support their close associates when their close associates are in prison and once their close associates are released from prison. Based on my training and experience, this includes giving money to a close associate upon his or her release from prison as a means of allowing the individual to re-enter the illegal drug trade more easily. Based on this, I believe that LEARY's statements reflect a close relationship between LEARY and WILLIAMS.

***WILLIAMS RE-SUPPLIES RICKS AND LEARY WITH NARCOTICS***

51. On or about March 12, 2023, at approximately 2:48 p.m., RICKS and WILLIAMS had a phone call during which RICKS indicated that he and LEARY needed additional narcotics for distribution. Specifically, the two had the following exchange:

RICKS: [Aside: Aight, bet it] Yellow cup.  
WILLIAMS: What's up, Bop?  
RICKS: What's up, my boy? Rah had called you or not?  
WILLIAMS: Yeah, he just called me just now.  
RICKS: Uh, 30 piece real quick.  
WILLIAMS: Aight.  
RICKS: I'm right on top.  
WILLIAMS: Aight.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that RICKS' reference to "Rah" was a reference to LEARY, whose first name is Rahjohn. I further believe that RICKS' reference to a "30 piece real quick" was a reference to RICKS and LEARY needing additional narcotics for distribution. Specifically, I believe they

were asking WILLIAMS for 30 bricks of heroin. I also believe that when RICKS stated, "I'm right on top," he was telling WILLIAMS he was in the UpTop Area.

52. At the time of the above-referenced call, law enforcement observed RICKS in the area of 156 Governor, the DTO stash house previously mentioned. Approximately 17 minutes later, at approximately 3:05 p.m., WILLIAMS called RICKS and stated, "I'm in the front, Bop." At approximately 3:07 p.m., a blue Chevy Malibu bearing New Jersey license plate ending in "NKM" (the "Malibu") pulled up in front of 156 Governor. The Malibu is known by law enforcement to be driven frequently by WILLIAMS.<sup>5</sup> Law enforcement then observed RICKS and LEARY approach and then enter the Malibu while it idled in front of 156 Governor. Approximately three minutes later, RICKS and LEARY exited the Malibu, and the Malibu drove off. Based on my training and experience, I know that it is common for seasoned drug distributors and gang members to conduct drug transactions within vehicles with tinted windows to avoid law enforcement detection and to prevent law enforcement from observing activity within the car, even though such tints are illegal.

53. On or about March 17, 2023, WILLIAMS again resupplied RICKS and LEARY with narcotics. Specifically, at approximately 9:10 p.m., RICKS and WILLIAMS had the following telephone call:

RICKS: Yo.

WILLIAMS: Where are you at, bro?

RICKS: I'm right here about to pull up right now, coming down, um, Park Ave and...what's this? Carroll.

WILLIAMS: Drop.

RICKS: Aight, bet it.

Based on my training and experience investigating narcotics offenses, and the investigation to date, I know that the word "drop" is used by drug distributors to refer to a re-supply of drugs. As such, I believe that WILLIAMS was telling RICKS, and RICKS understood him to mean, that WILLIAMS could provide a re-supply of drugs intended for distribution.

54. A few minutes after this exchange, at approximately 9:15 p.m., law enforcement observed LEARY entering the Malibu and exiting shortly thereafter.

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<sup>5</sup> For example, on or about April 2, 2023, WILLIAMS was observed stepping out of the driver side of the Malibu and interacting with an individual in the area of 156 Governor. In addition, on or about April 28, 2023, law enforcement conducted a motor vehicle stop of the Malibu following a traffic violation and the driver provided identification indicating he was WILLIAMS.

Immediately thereafter, law enforcement observed RICKS walk over to and enter the Malibu and exit shortly thereafter. RICKS then entered 156 Governor. Based on the content of the conversation between RICKS and WILLIAMS and the above-described surveillance, I believe that WILLIAMS supplied RICKS and LEARY with narcotics for distribution.

***RICKS and LEARY Discuss WILLIAMS Re-Supplying Them with Drugs***

55. The investigation has also shown RICKS and LEARY speaking about WILLIAMS as one of their sources of supply. For example, on or about March 12, 2023, at approximately 12:48 p.m., RICKS and LEARY had a phone call, which included the below excerpt of that conversation.

RICKS:                    You got them Lebrons?

LEARY:                    Yeah, Fed's just hit me. That's why I was calling you.

RICKS:                    I need 50 of them right now.

...

RICKS:                    Cause Fed, cause Fed says he only got Fireball. Yeah, I need Lebrons.

LEARY:                    Yeah, yeah he do, he do, he do. That's what I said.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that the reference to "Fed" indicates that LEARY and RICKS were discussing WILLIAMS, and that "Fireball" and "Lebron" are references to types of heroin and/or fentanyl sold by UpTop. I further believe that RICKS and LEARY were discussing what types of heroin and/or fentanyl WILLIAMS said he had in his possession to supply to the DTO.

56. On or about May 3, 2023, at approximately 3:49 p.m., RICKS and LEARY had a telephone call about heroin and/or fentanyl provided to them by WILLIAMS. An excerpt of their exchange is below.

LEARY:                    You got some of them joints that Fed gave you?

RICKS:                    Yeah.

LEARY:                    You got them at your rest or by that spot?

RICKS:                    Over there.

LEARY: Imma call you. He told me, told me to grab it from you. Imma call you uh we'll let him know how many.

RICKS: Aight, bet.

Based on my training and experience and the investigation to date, I believe that the reference to “Fed” is a reference to WILLIAMS. I further believe that the reference to “them joints” is a reference to heroin and/or fentanyl, supplied by WILLIAMS to RICKS. Additionally, when LEARY stated “[h]e told me, told me to grab it from you,” I believe he was saying that WILLIAMS told LEARY to pick up the narcotics from RICKS.

57. A few hours after that call, at approximately 5:30 p.m., RICKS called LEARY to direct LEARY to where the controlled substances were stored. Specifically, the two had the following exchange:

LEARY: Yo.

RICKS: Yo, uh, yo, under the tv.

LEARY: Aright, bet, [U/I] I'm looking at.

RICKS: Aright.

Minutes later, at approximately 5:39 p.m., LEARY called RICKS to ask about various stamps—indicating that the controlled substances WILLIAMS supplied was heroin and/or fentanyl—and their quality and/or popularity. Specifically, LEARY asked, “how the Nikes, how the Dolce and how the Love is,” and RICKS responded that that he had not “touched it yet” and that “I gotta to see what it, what it was.” Subsequent interceptions show LEARY calling another individual an hour later stating he had “different s\*\*t,” specifically naming “Nikes,” “Dolce,” and “Love.” The individual told LEARY that he would try “two buns,” or bundles, but not a whole “movie,” or brick, indicating that the substance they were discussing—and the substance RICKS and LEARY discussed previously—was heroin and/or fentanyl. Based on the investigation to date, including the above-referenced communications and a subsequent transaction detailed below where WILLIAMS agreed to distribute two “movies” of “Dolce,” I believe that LEARY was promoting the new supply of heroin and/or fentanyl that he received from WILLIAMS through RICKS.

**WILLIAMS OBTAINS NARCOTICS AND DISCUSSES  
INVOLVMENT IN NARCOTICS TRAFFICKING**

58. On or about May 27, 2023, at approximately 5:58 p.m., WILLIAMS had a call with an unidentified female (“UF1) during which he requested a quantity of drugs. Specifically, the two had the following exchange:

UF1: Hello.

WILLIAMS: What's up, [UF1]. You by the res?

UF1: Huh?

WILLIAMS: This Star's boy, you by the res?

UF1: Umm, You, you need something?

WILLIAMS: Yeah.

UF1: Alright, how many?

WILLIAMS: I'll be there in like, no longer than 2 minutes. I need uh... [ASIDE: What you need, bruh? I need 4. You want [U/I]? Well, let's go!] Five.

[KIDS VOICE IN BACKGROUND]

UF1: Five? Alright.

WILLIAMS: Aight.

UF1: Let me know when you outside.

WILLIAMS: Aight.

59. Approximately seven minutes later, WILLIAMS called UF1 and stated, “come outside, I’m in a black truck.” Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communications and other communications, and the results of the investigation to date, I believe that WILLIAMS drove to UF1’s location so that he could purchase the quantity of suspected heroin and/or fentanyl that he referenced in the earlier telephone call between the two.

60. On or about June 4, 2023, at approximately 3:57 p.m., WILLIAMS and an unknown man (“UM3”) had a telephone conversation during which WILLIAMS arranged for UM3 to purchase two bricks of heroin and/or fentanyl with the stamp “Dolce.” A relevant excerpt of that call is included below.



UM3: Ay yo, who else got, who else got your s\*\*t? The green s\*\*t.

WILLIAMS: What...the uh, uh...Dolce?

UM3: Yeah... [Aside: I had this bitch. I fu\*\*\*d her up...]

WILLIAMS: Huh?

UM3: Yeah. [Aside: With her big nose.]

WILLIAMS: I got like 2 different ni\*\*\*s. Why, what you need?

UM3: I only need like 2 movies.

WILLIAMS: Uh, yeah, you gotta pay him right there though, I'm sayin', I ain't givin' you no movies [SNICKERS]. I ain't fu\*\*\*ng with you like that. You can keep them 5 movies [SNICKERS] I'll buy these though. Or anything, I'll give that money. I aint fu\*\*\*ng with you. You on some bull\*\*\*t. You be on some bull\*\*\*t. Word is bond.

UM3: Ah...it aint even, nah-

[Voices overlap]

WILLIAMS: Nah, SAP [Ph], I got the s\*\*t, but you just gotta buy it!

UM3: Aight. Bet.

WILLIAMS: Aight, nah-aight, where you at? I got it right here.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that when UM3 referenced “the green s\*\*t” and WILLIAMS referenced “Dolce,” they were discussing heroin and/or fentanyl stamped “Dolce” in green ink. I further believe that when UM3 stated that he needed “two movies,” he was saying that he wanted to purchase two bricks of heroin and/or fentanyl from WILLIAMS. Additionally, I believe that when WILLIAMS said, “I got it right here,” WILLIAMS was saying that he currently had in his possession the heroin and/or fentanyl for UM3 to purchase.

61. On or about June 10, 2023, at approximately 5:24 p.m., WILLIAMS and an unknown man (“UM4”) discussed WILLIAMS purchasing cocaine base and/or crack cocaine. Specifically, WILLIAMS told UM4 that he needed \$20 of

cocaine base and/or crack cocaine that had already been cooked. An excerpt of the conversation between WILLIAMS and UM4 is included below.

WILLIAMS: I need uh, I need some of that shit.

UM4: What you need?

WILLIAMS: Like, like a dub.

UM4: Twenty?

WILLIAMS: Yeah.

UM4: Aright I'm about to go get it. As a matter fact, I got you.

WILLIAMS: Cooked though.

UM4: Ahh, you gonna have to give me a minute.

WILLIAMS: You ain't got it cooked already?

UM4: Nah.

WILLIAMS: Aight, don't worry about it, it's good.

UM4: Aight, bet.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communication and other communications, and the results of the investigation to date, I believe that WILLIAMS was trying to buy crack cocaine from UM4 and that his reference to needing the cocaine “[c]ooked” was WILLIAMS specifying that he wanted to purchase crack cocaine, as opposed to powder cocaine. I further believe that once UM4 heard that WILLIAMS wanted to buy crack cocaine, he told WILLIAMS that he needed some time to procure the crack cocaine. I also believe the reference to “20” was WILLIAMS specifying that he wanted \$20 of crack cocaine.

62. Approximately, 54 minutes later, at approximately 6:18 p.m., WILLIAMS called UM4 to check on the status of the crack cocaine that he wanted to purchase, with UM4 telling WILLIAMS that he could come to UM4 to pick up the drugs. Specifically, the two had the following exchange.

UM4: Yo.

WILLIAMS: What it's looking like my boy?

UM4: You can, you can come through, bruh

WILLIAMS: Huh?  
UM4: You can come.  
WILLIAMS: Come through?  
UM4: Yeh, yes come through.  
WILLIAMS: Aright.

Based on my training and experience investigating narcotics offenses, the contents of the above-referenced communications and other communications, and the results of the investigation to date, I believe that UM4 was telling WILLIAMS that the crack cocaine discussed in their previous telephone conversation was ready and that WILLIAMS could come to UM4's location to purchase the drugs.

63. On or about May 28, 2023, at approximately 2:55 p.m., WILLIAMS had a conversation with a different unidentified man ("UM5") about distributing cocaine base and/or crack cocaine. The following is a relevant excerpt of that call.

WILLIAMS: Ay, yo!  
UM5: What's good bro?  
WILLIAMS: I got my real ni\*\*\*s on Broadway. He can give you some hard. He can help you move that s\*\*t.  
UM5: Aight.  
WILLIAMS: You still got that 70 or you cooked it?  
UM5: I got like, probably like, I moved some of it. You know what I mean, I got like 40...  
WILLIAMS: Aight, lets clear the, we at 180 on the last 45, lets clear that so we can just be at 70.  
UM5: Aight. Bet.  
WILLIAMS: I'm a pull back up on you in a minute before I get on the highway. I'm a call you.  
UM5: Aight.  
WILLIAMS: Yeah, them ni\*\*\*s been calling me for base but I've been stalling them cause I know you be

wanting to move your, [WILLIAMS gets side tracked in conversation by another driver on the road] what the f\*\*k is this person doing, man-f\*\*k is wrong with these people!

[Pause]

WILLIAMS: You heard me?

UM5: Yeah, I heard you.

[Voices overlap]

WILLIAMS: I know you be wanting to move your s\*\*t, you feel me?

UM5: Yeah...

WILLIAMS: But I told you I still got like, I still got like a couple of hundreds of [U/I]

UM5: Aight. Just uhm...come before you leave, just come get with me.

WILLIAMS: Aight, bet, I got you.

UM5: Bet. Aight

Based on my training and experience investigating narcotics offenses, I know that “hard” is slang for cocaine base. I therefore believe that WILLIAMS’ reference to knowing people that could get UM5 “hard” was a reference to knowing people that could get cocaine base for UM5 to sell. I further believe that when WILLIAMS asks UM5 “you still got that 70 or you cooked it,” that he was asking UM5 whether UM5 still had a quantity of cocaine or if he had already cooked that quantity, thus turning it into crack cocaine. I also believe that when WILLIAMS stated that people had been “calling [him] for base,” he was saying that people are interested in purchasing cocaine base and/or crack cocaine from WILLIAMS.

#### **WILLIAMS IS CAREFUL TO AVOID DETECTION BY LAW ENFORCEMENT**

64. On or about May 25, 2023, at approximately 2:50 p.m., WILLIAMS had a call with an unknown man (“UM6”) during which the price of drugs was discussed. Specifically, the two had the following exchange:

UM6: Hello.

WILLIAMS: Hey UM6, this is Meg.

UM6: Huh?

WILLIAMS: This is Meg, you all.

UM6: Aright bet um... how much you want for that s\*\*t?

WILLIAMS: FaceTime me man.

Based on my training and experience investigating narcotics offenses, the content of the above-referenced communication and other communications, and the results of the investigation to date, I believe that when UM6 asked WILLIAMS “how much you want for that s\*\*t,” he was asking WILLIAMS how much he wanted for some quantity of unknown narcotics. I further believe that when WILLIAMS answered, “FaceTime me,” he was indicating that he did not want to continue the conversation on the telephone, but preferred speaking with UM6 about narcotics prices on Apple’s Facetime application. Based on my training and experience, I know that criminals often speak on electronic applications, such as FaceTime, because they are not as susceptible to law enforcement surveillance.

65. During the June 4, 2023 call with UM3 referenced above, in paragraph 60, WILLIAMS indicated that he believed law enforcement had placed a tracker on the Malibu, with UM3 and WILLIAMS discussing what WILLIAMS should do with the car. A relevant excerpt of that call is included below.

WILLIAMS: Yeah, I don’t know who checked it but it was, State boys for sure. They got a tracker under my s\*\*t. That’s what I was trying to tell you. That’s why I left that s\*\*t over there. Word is bond. I left that s\*\*t over there for like...I left that s\*\*t over there last Sunday! Word is bond-it’s a week now. I went over there last night to check it though, its right there though, its right there though. I gotta...I probably gotta move that s\*\*t.

UM3: Yeah, I was bout to say you gotta let somebody that don’t do nothing illegal drive that s\*\*t, word is bond.

WILLIAMS: Nah, I’m on it.

UM3: Word is bond.

WILLIAMS: I already told them!

UM3: Yeah.

WILLIAMS: Take the tints off..

UM3: Run it, I would leave the tints up there make them think it's you still. Like, "Look at em, we got em, he on 80!" F\*\*\*ing go up to the f\*\*\*ing nursery home.

On or about May 29, 2023, law enforcement first observed that the Malibu had been left in Passaic, New Jersey. Based on my training and experience and the investigation to date, I believe that during this call WILLIAMS was stating that he suspected law enforcement had placed a GPS tracker under the Malibu and that in response, WILLIAMS had abandoned the Malibu in Passaic. I further believe that when WILLIAMS stated "I probably gotta move that s\*\*t," he was saying that he would eventually need to move the Malibu from Passaic. I further believe that when UM3 said "you gotta let somebody that don't do nothing illegal" to move the car, he was suggesting to WILLIAMS that someone else should move the Malibu given WILLIAMS' involvement in illegal activity.

#### **GODWIN PAYS RICKS FOR NARCOTICS USING CASHAPP**

66. The investigation has revealed that when supplying each other with narcotics, various members and associates of the DTO pay each other using CashApp, which, as explained above, is a mobile payment service.

67. For example, on or about May 16, 2023, at approximately 11:36 a.m., GODWIN called RICKS and the pair discussed what type of heroin and/or fentanyl RICKS could sell to GODWIN. Specifically, RICKS told GODWIN that he had heroin and/or fentanyl with the "Empire" stamp written in blue ink. GODWIN then asked for two bricks and said he would pay for the drugs via CashApp. Below are relevant excerpts from that call between GODWIN and RICKS:

RICKS: Yo.

GODWIN: Hey yo, you're mobile bro?

RICKS: Yeah, I'm on my way to you now.

GODWIN: Oh shoot, you was already on your way [Audio glitch] here, my boy.

RICKS: [U/I]

GODWIN: Yo I, you, you [Stammers] whatchu, whatchu got, whatchu brought out with you?

RICKS: Oh um, three lottery uh, Empire, blue stamp.

...

GODWIN: A'right, yeah, yeah, a'right bet it, bet it, you are coming out right now?

RICKS: You said three, right?

GODWIN: A'right, I got the two, yeah, no I only need two, I need two.

RICKS: A'right.

GODWIN: I'm sayin' I got the money for two on me right now that's what I'm sayin' so [Voices overlap]

RICKS: I'll just bring the three there.

GODWIN: A'right, I got CashApp though, you heard me. A'right, so I'mma send you the money right now.

RICKS: I'm coming. A'right.

Based on my training and experience investigating narcotics offenses and the investigation to date, I believe that when RICKS stated, “three lottery, uh, Empire, blue stamp,” RICKS was telling GODWIN that he had three bricks of “Empire” heroin and/or fentanyl with the stamp written in blue ink, with the bricks wrapped in lottery paper. I further believe that when GODWIN stated, “I only need two,” he was telling RICKS that he wanted to purchase two bricks of heroin and/or fentanyl. Also, I believe that when GODWIN stated “I got CashApp” and that he was going to “send you the money right now,” he was telling RICKS that he was going to send RICKS money via CashApp to purchase the drugs.

68. Approximately seven minutes after this call, RICKS received a text message that stated “Jamah Godwin-Deavereaux sent you 100.” The investigation has shown that Jamah Godwin-Deavereaux is GODWIN’s full name. Based on my training and experience, I believe that RICKS was selling GODWIN heroin and/or fentanyl at wholesale prices given that GODWIN is a member and associate of UpTop and therefore entitled to significantly cheaper prices than a regular customer. I further believe that, and as explained above, \$100 for two bricks, or \$50 per brick, of heroin and/or fentanyl is consistent with the wholesale price for a brick of heroin and/or fentanyl in Paterson, New Jersey.

69. Approximately 52 minutes after that CashApp text message, RICKS called GODWIN to tell him “I’m here,” with GODWIN instructing RICKS to meet him on “the second floor,” specifying: “You walk to the stairs, I come to the door,

you're going to see me, right there." Based on my training and experience investigating narcotics offenses, the contents of these communications and other communications, and the results of the investigation to date, including the fact that GODWIN had just sent RICKS \$100, I believe that RICKS was indicating he had arrived at the agreed upon location to deliver narcotics to GODWIN, with GODWIN directing RICKS to the specific apartment he was in so that RICKS could deliver the narcotics that GODWIN had already paid for via CashApp.

### **TAYLOR AND RICKS ARGUE OVER DRUG PROCEEDS**

70. The investigation has revealed that when working together to sell narcotics, members and associates of UpTop sometimes argue over how to divide the proceeds of the illegal transactions. For example, on or about April 11, 2023, at approximately 9:17 p.m., TAYLOR and RICKS argued over money earned from the sale of narcotics. Specifically, the two had the following exchange:<sup>6</sup>

TAYLOR: You buggin'. I paid you for them plays when the J passed you the money through the window. I paid you for [audio fades]. You told me to give you \$55 for that s\*\*t.

RICKS: You ain't never give me no \$55. [Voices overlap]

TAYLOR: On my daughter's life I paid you for that s\*\*t. You told me give me \$55 for that s\*\*t, matter fact- yo Bop you cappin yo [Voices overlap].

RICKS: When, when, when Cat?

TAYLOR: After, Bop.

RICKS: When?

TAYLOR: Man- they passed you the money through the window, Slime, you was with me [Voices overlap]

RICKS: So, so you mean to tell me I took the money and passed you the money back?

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<sup>6</sup> Law enforcement knows that TAYLOR was the individual with whom RICKS was arguing because law enforcement has observed TAYLOR pick up his cellphone when the number associated with the above exchange between RICKS and TAYLOR has been called.



TAYLOR: Yo, no, you gave me the money [U/I] I asked you how much you want for that s\*\*t, you said 55 Bop.

RICKS: So, you paid me yesterday for the seven bundles?

TAYLOR: Yes Bop! You [U/I]!

RICKS: Yeah, you f\*\*\*\*\*g lying bro.

TAYLOR: Slime, on my daughter, my n\*\*\*a [U/I] on my daughter [U/I] that s\*\*t.

RICKS: [U/I] you ain't gave me s\*\*t.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that RICKS' reference to "Cat" shows he was speaking with TAYLOR, whose nickname is "Fat Cat." Further, I believe, based on this call, that RICKS and TAYLOR had worked together to complete a narcotics sale and were subsequently arguing over the proceeds of the transaction. Specifically, when TAYLOR stated, "I paid you for them plays when the J passed you the money through the window," TAYLOR was recounting the sale of heroin and/or fentanyl to a customer. As such, when RICKS asked, "you paid me yesterday for the seven bundles," he was questioning whether TAYLOR provided RICKS with RICKS' cut of the illicit proceeds.

71. Despite the dispute, the investigation has shown that RICKS and TAYLOR continued to work together in furtherance of the conspiracy. For example, on or about April 26, 2023, at approximately 9:21 p.m., RICKS called BLAIR to see if BLAIR had 10 bricks of heroin and/or fentanyl for TAYLOR. Specifically, RICKS, BLAIR, and TAYLOR had the following exchange:

RICKS: Yo! Fat Cat right here, he needs lottery.

BLAIR: I ain't around.

RICKS: Huh?

BLAIR: I left.

RICKS: You left?

BLAIR: Yeah.

TAYLOR [in the background of RICKS' phone]: You don't got 10? I need 10 plays of that s\*\*t, bruh.

RICKS: Oh....

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that RICKS's reference to "Fat Cat" was a reference to TAYLOR and the reference to "lottery" was a reference to heroin wrapped in lottery paper. I further believe that TAYLOR's reference to needing "10 plays" was a reference to him needing 10 bricks of "Lottery" heroin for distribution.

**LEARY RETURNED HEROIN AND/OR FENTANYL  
SUPPLIED TO HIM BY CARLOS**

72. The investigation has also shown that members and associates, as well as customers, often return heroin and/or fentanyl after an exchange was made either because it was not the correct stamp or was of low quality.

73. For example, on or about May 3, 2023, at approximately 5:45 p.m., LEARY called CARLOS<sup>7</sup> and told him "I'm about to come" and that he "need[ed] ten." Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that when LEARY stated he needed "ten," he was requesting ten bricks of heroin and/or fentanyl from CARLOS.

74. Approximately 24 minutes later, after CARLOS had supplied LEARY with the heroin, LEARY called CARLOS back and asked to return the narcotics because it was not the stamp that LEARY's customer wanted. Specifically, at approximately 6:09 p.m., LEARY and CARLOS had the following exchange:

CARLOS: Yeah.

LEARY: Hey, this the Lebron. You don't got the Fireball?

CARLOS: They don't got no more Fireball.

LEARY: Damn, he wants the L- he wants the Fireball, bro.

CARLOS: Everybody is saying the same thing. S\*\*t.

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<sup>7</sup> Law enforcement knows that it was CARLOS on the phone with LEARY during this call because law enforcement observed the phone number associated with CARLOS listed in the contacts of TURNER's phone, which was seized during an arrest of TURNER, discussed below. The number was listed under the name "Spaz," which is a known nickname of CARLOS'. Further, when the number associated with CARLOS is entered in CashApp, the name associated with that phone number appears as "Justin Carlos."

LEARY: Huh?

CARLOS: Damn. You can't, you can't find that s\*\*t?

LEARY: He be- this my big J right here, you hear me?  
[Voices overlap]

CARLOS: I know. You know it's the same s\*\*t. He ain't gonna like it?

LEARY: Maybe the name change from where he at.

CARLOS: Oh, s\*\*t.

LEARY: Hold on, this the n\*\*\*a, so I'm call, I'mma call you right back.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that CARLOS had supplied LEARY with heroin and/or fentanyl to sell to LEARY's "big J," or one of his biggest customers, and that LEARY's customer had objected to buying "Lebron James" heroin because the customer wanted "Fireball" heroin. I further believe that the customer in question called LEARY during the above conversation between LEARY and CARLOS, with LEARY telling CARLOS that he would call him back after speaking with the customer.

75. Approximately four minutes later, LEARY called CARLOS and said that his customer was "picky" and wanted "the Fireball." CARLOS agreed to let LEARY return the "Lebron James" heroin, telling LEARY to "bring that s\*\*t back."

76. The investigation revealed that such interactions do not impact members and associates of UpTop from continuing to rely on each other for new supplies of drugs, including LEARY continuing to seek drugs from CARLOS. For example, on or about May 8, 2023, approximately five days after LEARY returned drugs supplied to him by CARLOS, LEARY called CARLOS at approximately 1:40 p.m. and asked whether CARLOS had heroin and/or fentanyl in his possession that LEARY could obtain to sell to a customer. Specifically, at approximately 3:40 p.m., the two had the following exchange:

CARLOS: Yo.

LEARY: Yo, whats good? Where you at? By the block?

CARLOS: Yeah.

LEARY: Yo, which, which, which one you got? FB or LB?

CARLOS: I got LB.

LEARY: Dang, you don't got no FB?

CARLOS: No, I got LB and I got uh, luck...uh uh, Looney Tunes fire, purple stamp, fire...

LEARY: Aight. Bet. Im a hit you back, tell this n\*\*\*a.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that the references to "FB" and "LB" were references to "Fireball" and "Lebron James" heroin and/or fentanyl. I further believe that LEARY was inquiring about obtaining certain stamps of heroin and/or fentanyl from CARLOS to sell to LEARY's customers.

**DRAKEFORD IS AN ACTIVE MEMBER AND ASSOCIATE OF UPTOP**

77. The investigation has shown that DRAKEFORD is a member and associate of UpTop who is actively involved in the distribution of heroin and/or fentanyl.

78. For example, on or about May 6, 2023, law enforcement observed DRAKEFORD engage in a hand-to-hand drug transaction in the location known as the "Cut" of the Incca Village. Specifically, at approximately 2:56 p.m., law enforcement observed CARTER approach and speak with an individual standing at the "Cut," which law enforcement knows is a location the DTO frequently distributes drugs. Law enforcement observed CARTER leave the "Cut," with the individual remaining there. Approximately two minutes later, at approximately 2:58 p.m., law enforcement observed DRAKEFORD approach the individual standing in the Cut and engage in a hand-to-hand drug transaction. Based on my training and experience investigating narcotics offenses, I know that it is common for one member of a DTO to tell a customer where to wait to make a drug purchase, with another member of the DTO actually completing the sale.

79. Additionally, on or about May 17, 2023, at approximately 7:05 p.m., law enforcement observed RICKS and DRAKEFORD arrive outside of 156 Governor, the known stash house of UpTop's referenced above. RICKS was then observed entering 156 Governor. Approximately two minutes later, RICKS exited the residence and handed DRAKEFORD what appeared to be a package wrapped in lottery paper, which I believe was heroin and/or fentanyl intended for distribution.

80. Also, on or about June 5, 2023, at approximately 7:04 p.m., law enforcement observed DRAKEFORD engage in a hand-to-hand drug transaction that took place in the "Cut" of the Incca Village. Specifically, law enforcement observed DRAKEFORD approach an individual standing in the "Cut," with

DRAKEFORD then leaving the area while the individual remained. Approximately three minutes later, law enforcement observed DRAKEFORD return to the individual still standing in the “Cut.” At that point, the two engaged in a hand-to-hand drug transaction.

81. At approximately 7:23 p.m., just minutes after surveillance showed the drug transaction involving DRAKEFORD, law enforcement stopped the individual observed purchasing narcotics from DRAKEFORD. During a search of the individual, the individual was found with approximately one bundle of suspected heroin and/or fentanyl that contained the “Fireball” stamp.

**TURNER POSSESSED A FIREARM  
IN FURTHERANCE OF THE CONSPIRACY**

82. On or about March 16, 2023, at approximately 9:43 p.m., law enforcement observed an individual, later identified as TURNER, walking in the UpTop Area with what appeared to be the handle of a handgun protruding from the outside of TURNER’s pants pocket. Those law enforcement officers relayed a description of TURNER to other law enforcement officers in the area who in turn arrived in that vicinity and saw an individual matching TURNER’s description.

83. Law enforcement officers approached TURNER, announced their presence, and told TURNER to keep his hands in the air. When TURNER stood up, law enforcement observed in plain view the handle of a black firearm in TURNER’s pants pocket. At that point, TURNER was placed in handcuffs, and law enforcement removed from TURNER’s pants a Kel-Tec PMR-30 semi-automatic .22 caliber handgun, bearing serial #WXXJ40. The firearm recovered from TURNER was equipped with a high-capacity magazine, loaded with 30 rounds of .22 caliber ammunition.

84. During a search of TURNER incident to arrest, law enforcement recovered one brick of suspected heroin, which contained the “Lebron James” stamp. Law enforcement also recovered four small bags of suspected crack cocaine from TURNER.

85. Starting less than 30 minutes after TURNER’s arrest, RICKS and LEARY exchanged multiple telephone calls during which they discussed the fact that TURNER had been selling drugs at the time of his arrest and that they believed that he had a gun in his possession when arrested. For example, at approximately 10:18 p.m., LEARY told RICKS that TURNER had been “serving my peoples.” RICKS agreed, saying that he had been told TURNER was serving a “J” at the time of the arrest. Based on my training and experience investigating narcotics offenses, the contents of these communications and other communications, and the results of the investigation to date, I believe that

LEARY and RICKS were saying that at the time TURNER was arrested, TURNER was selling narcotics to one or more of LEARY's customers.

86. On another call between RICKS and LEARY approximately three minutes later, LEARY stated that TURNER "probably had the strap on him." Based on my training and experience, I believe that LEARY's use of the word "strap" was a reference to a firearm.

87. Approximately 10 minutes later, at approximately 10:31 p.m., LEARY called RICKS and told him to stop selling drugs for the time being. Specifically, the two had the following exchange:

RICKS: Yo.

LEARY: Where you at, bro?

RICKS: I'm right here in Gardfield right now.

LEARY: Close shop down, bro.

RICKS: You think like, s\*\*t's funny?

LEARY: Yeah, close shop down.

RICKS: A'right, bet. Not even a pop [U/I]?

LEARY: Nothing, nobody, nobody, close shop down.

RICKS: A'right bet it.

LEARY: A'right.

Based on my training and experience investigating narcotics offenses, the contents of this call and other communications, and the results of the investigation to date, I believe that LEARY was suggesting to RICKS to stop all narcotics transactions because he was apprehensive about potentially increased law enforcement attention because of TURNER's arrest earlier that evening.

### **PRICE FOUND WITH A FIREARM AND NARCOTICS**

88. On or about April 25, 2023, law enforcement observed PRICE standing in the UpTop Area with other known members and associates of the DTO. Specifically, the group was at or around the location where PRICE was previously observed on or about March 9, 2023 selling drugs supplied to him by RICKS. See ¶ 37 above. At approximately 6:36 p.m., law enforcement observed a known member and associate of UpTop, who was less than 18-years-old on

April 25, 2023 (“Co-Conspirator-1”), hand PRICE what appeared to be a black handgun with an extended magazine, which PRICE placed in the waist band of his pants. PRICE then walked away from Co-Conspirator-1 and the other members of the DTO and entered a residence at 40 Carroll Street in the UpTop Area (“40 Carroll”). Moments later, law enforcement observed PRICE leave 40 Carroll without the firearm in his possession.

89. When law enforcement approached the vicinity, PRICE, Co-Conspirator-1, and the other members and associates of the DTO attempted to flee. Law enforcement pursued and apprehended PRICE and Co-Conspirator-1. PRICE was found with approximately one bundle of suspected heroin that contained the “Fireball” stamp written in green ink. Subsequent testing showed the suspected heroin packaged with the “Fireball” stamp was, in fact, a mixture containing detectable amounts of fentanyl. Co-Conspirator-1 was found in possession of nine baggies containing suspected crack cocaine and one glassine of suspected heroin.

90. Within approximately two hours of PRICE’s arrest, a search warrant was executed on 40 Carroll. Between the time of PRICE’s arrest and the execution of the search warrant, law enforcement was positioned outside of 40 Carroll to ensure that nobody went in or out of the residence until the search was completed. During that search of 40 Carroll, law enforcement recovered a black 9mm “ghost” handgun with an extended magazine, loaded with approximately 16 rounds of ammunition, including one hollow-point round.

**FIELDS SOLD HEROIN AND/OR FENTANYL  
TO AN UNDERCOVER OFFICER**

91. On or about March 16, 2023, the ATF, utilizing an undercover agent (the “UC”), conducted a controlled purchase of approximately five bricks of heroin and/or fentanyl from FIELDS. Specifically, at approximately 2:43 p.m., the UC placed a telephone call to a phone number associated with FIELDS and inquired about purchasing narcotics, namely heroin containing the Lebron James stamp. FIELDS responded, in sum and substance, that the UC should call back when the UC was close to the UpTop Area. At approximately 6:18 p.m., the UC placed another call to FIELDS during which FIELDS provided the UC an address on Lawrence Street in the UpTop Area where the narcotics transaction would occur. These calls were recorded, and law enforcement has reviewed the recordings.

92. At approximately 6:23 p.m., after the UC had arrived at the agreed-upon location, FIELDS called the UC to confirm what type of vehicle the UC was driving. This call was recorded, and law enforcement has reviewed the recording. Once confirmed, FIELDS approached the UC’s vehicle and leaned in the window of the UC’s car. FIELDS then handed the UC five bricks of suspected heroin in exchange for approximately \$500 in United States currency. The narcotics

transaction was video- and audio-recorded and law enforcement has reviewed the contents of the recording.

93. The glassines of suspected heroin purchased by the UC from FIELDS were marked with the “Lebron James” stamp. Subsequent testing showed the suspected heroin was, in fact, a mixture containing detectable amounts of fentanyl.

**FIELDS FOUND WITH 27 BRICKS OF HEROIN AND/OR FENTANYL**

94. On or about May 31, 2023, law enforcement stopped a vehicle being driven by FIELDS and in which FIELDS was the sole occupant. A K9 officer was called to the scene and detected the presence of drugs in the vehicle, which was then searched by law enforcement. During that search, law enforcement discovered approximately 27 bricks of suspected heroin, including suspected heroin stamped with “Fireball” in teal ink, “Fireball” in green ink, and “Lebron James.” FIELDS was also found with approximately \$1,559 in various denominations. Subsequent testing showed the suspected heroin was in fact a mixture containing a detectable amount of fentanyl.