
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	SUPERSEDING COMPLAINT
	:	
v.	:	
	:	
LANCE BAKER,	:	Honorable Edward S. Kiel
ABINADER LIRIANO BALBUENA,	:	
ROOKS CRAWFORD,	:	
DERRICK GILLIAM,	:	Mag. No. 23-15044
TYRONE GILLIAM,	:	
LEWIS MARTINEZ-BERROA,	:	<u>FILED UNDER SEAL</u>
EARL RILEY,	:	
a/k/a "Mo," and	:	
MICHAEL WILLIAMS	:	

I, Christopher Doukas, 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 Task Force Officer with the Drug Enforcement Administration, and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

/s/ Christopher Doukas
Christopher Doukas, Special Agent
Bureau of Alcohol, Tobacco,
Firearms, & Explosives

Christopher Doukas, Special Agent with the Bureau of Alcohol, Tobacco, Firearms, & Explosives, attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 20th day of March 2023.

/s/ Edward S. Kiel
Hon. Edward S. Kiel, U.S.M.J.

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

From at least as early as in or around July 2022 through in or around March 2023, in the District of New Jersey and elsewhere, defendants,

**LANCE BAKER,
ABINADER LIRIANO BALBUENA,
ROOKS CRAWFORD,
DERRICK GILLIAM,
TYRONE GILLIAM,
LEWIS MARTINEZ-BERROA,
EARL RILEY,
a/k/a “Mo,” and
MICHAEL WILLIAMS,**

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)(C).

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

ATTACHMENT B

I, Christopher Doukas, 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 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, I am asserting that it took place on or about the date alleged.

Background of the Investigation

1. Since in or around June 2022, the ATF and the Drug Enforcement Administration (the “DEA”) along with state and local law enforcement agencies, have been investigating a drug trafficking organization operating in and around Union County, New Jersey (the “DTO”), which includes Lance Baker (“BAKER”), Rooks Crawford (“CRAWFORD”), Tyrone Gilliam (“T. GILLIAM”), Derrick Gilliam (“D. GILLIAM”), Lewis Martinez-BERROA (“MARTINEZ-BERROA”), Earl “Mo” Riley (“RILEY”), and Michael Williams (“WILLIAMS”). The DTO distributes controlled substances including, but not limited to, fentanyl.

2. Between July 2022 and March 2023, law enforcement engaged in approximately seventeen controlled purchases with BAKER through which approximately one hundred eighty-six (186) bricks¹ of fentanyl and heroin were acquired. All of the controlled purchases were captured by body-worn audio-recording devices or video-recording devices.

3. In the course of the investigation, law enforcement obtained multiple Court Orders authorizing the interception of wire and electronic communications occurring over several 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, controlled purchases, and the execution of court-authorized search warrants, 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.

¹ A “brick” is a term used to refer to fifty individual glassines of heroin or fentanyl. Each brick contains approximately two grams of heroin or fentanyl.

4. The investigation has revealed that: T. GILLIAM and D. GILLIAM supply heroin and/or fentanyl² to BAKER; CRAWFORD and WILLIAMS supply heroin and/or fentanyl to BAKER and RILEY; and MARTINEZ-BERROA supplies heroin and/or fentanyl to CRAWFORD.

**MARTINEZ-BERROA SUPPLIES HEROIN AND/OR FENTANYL TO
CRAWFORD**

5. The investigation has revealed that MARTINEZ-BERROA supplies heroin and/or fentanyl to CRAWFORD, who along with WILLIAMS, supplies heroin and/or fentanyl to RILEY and BAKER.

6. On or about February 18, 2023, at approximately 2:12 p.m., MARTINEZ-BERROA called CRAWFORD. CRAWFORD told MARTINEZ-BERROA that he would see him the next day and that they should discuss something that would be “good for both of [them].”

7. On or about February 19, 2023, at approximately 4:30 p.m., law enforcement observed CRAWFORD drive a Gray Audi to MARTINEZ-BERROA’s residence in Elizabeth, New Jersey. CRAWFORD called MARTINEZ-BERROA, who told CRAWFORD to meet him at another location in Elizabeth, New Jersey. CRAWFORD drove his vehicle to that location, arriving at approximately 4:47 p.m. Law enforcement observed MARTINEZ-BERROA enter the front passenger side of Crawford’s Gray Audi and exit the vehicle two minutes later.

8. On or about March 1, 2023, MARTINEZ-BERROA told CRAWFORD that he had a new batch of heroin and/or fentanyl that he wanted to give to CRAWFORD. Specifically, at approximately 11:45 a.m. on March 1, 2023, the two had the following exchange:

MARTINEZ-BERROA: Yo, yo.

CRAWFORD: What’s going on, man? You around?

MARTINEZ-BERROA: What’s going on? Yeah.

CRAWFORD: Okay, um, I’ll be up there like 45 minutes man, I have something for you.

MARTINEZ-BERROA: A’ight cool. Yeah, I want you...

² The UC purchased substances that field tested positive for heroin as well as substances that field tested positive for fentanyl. In addition, street-level distributors frequently mix heroin and fentanyl when packaging substances for sale. As such, this complaint uses the term “heroin and/or fentanyl.”

[Voices Overlap]

CRAWFORD: [Unintelligible ("U/I")]

MARTINEZ-BERROA: I want you to see something that came in yesterday.

CRAWFORD: Okay, okay, I'll see you in about 45 minutes.

MARTINEZ-BERROA: Alright cool.

CRAWFORD: Okay.

9. Later that day, CRAWFORD traveled to MARTINEZ-BERROA's residence and MARTINEZ-BERROA entered CRAWFORD's vehicle. After approximately three minutes, MARTINEZ-BERROA departed from CRAWFORD's vehicle. At approximately 1:34 p.m. on or about March 1, 2023, CRAWFORD called WILLIAMS, RILEY, and BAKER to tell them he had "something to show them" (meaning that he wanted to give them the heroin and/or fentanyl from MARTINEZ-BERROA) and/or that he wanted to provide them with test samples, presumably from the batch that MARTINEZ-BERROA provided to CRAWFORD.

10. During the course of the investigation, law enforcement has obtained at least 20 bricks of heroin and/or fentanyl from MARTINEZ-BERROA.

**CRAWFORD AND WILLIAMS SUPPLY HEROIN AND/OR
FENTANYL TO BAKER**

11. The investigation has shown that CRAWFORD and WILLIAMS supply heroin and/or fentanyl to BAKER.

12. For example, on or about December 7, 2022, at approximately 1:59 p.m., BAKER called CRAWFORD and the two had the following exchange:

BAKER: Going to meet about the sh*t, so, and, and, they, they get, they -- like, the review on those was like a seven. Basically, everybody said it's, it's, it's, it's decent, it's a seven.

CRAWFORD: Alright. So, it's not, um, the nine that he was saying.

BAKER: Uh, not, not, not, not this, this one. I'm saying, uh, I don't know if it's different or they did...

CRAWFORD: Yeah.

BAKER: Did something to it.

. . . .

CRAWFORD: What they say? Like, um, what, what can be done?

BAKER: Uh, 'cause nah, actually, they just gave it a, they just gave it a -- I just said, from a scale of one to ten, everybody, all, all [U/I], they gave it to me, uh, said it was a seven.

CRAWFORD: Okay.

BAKER: When I talk -- I'll, I'll get with them and, and, and ask what, what can be done once I, uh, come over.

13. The DTO stamped its heroin and/or fentanyl with different pictures, including references to movies and drug culture. One of the DTO's most popular batches of heroin and/or fentanyl was stamped with "Frank Lucas," a reference to the infamous drug trafficker who operated in New Jersey and New York. For example, on or about January 20, 2023, at approximately 1:26 p.m., a caller asked BAKER "Where you getting Frank Lucas from?" BAKER responded, "That's ours. That's us, that's what we got." Numerous other users/purchasers requested "Frank" from BAKER during the course of the investigation, and BAKER sold it to them.

14. On or about March 3, 2023, CRAWFORD and WILLIAMS brought heroin and/or fentanyl with the "Frank Lucas" stamp to BAKER at his request. At approximately 12:42 p.m., WILLIAMS called BAKER. The two had the following exchange:

BAKER: What's good?

WILLIAMS: What you looking like?

BAKER: Uh, when you get a chance, I'ma need two "Franks."

WILLIAMS: Aight. Um, well good thing you answered 'cause I was getting ready to run out.

BAKER: Alright. Well, whenever, I'm saying, it ain't no rush, I'm just saying.

WILLIAMS: I'ma be getting with you in a little while 'cause I got a lot of running to do this weekend.

BAKER: Aight.

WILLIAMS: Aight. So [U/I]. You up this way, right?

15. Approximately 20 minutes later, law enforcement observed BAKER depart from his residence in Elizabeth and walk toward Elizabeth Avenue. BAKER was observed approaching WILLIAMS's vehicle, which was parked nearby with WILLIAMS in the driver's seat and CRAWFORD in the front passenger seat. BAKER reached into the front passenger seat and walked away from Williams's vehicle counting currency in his hands and placing his right hand in his pocket.

CRAWFORD SUPPLIES HEROIN AND/OR FENTANYL TO RILEY

16. The investigation has revealed that CRAWFORD supplies heroin and/or fentanyl to RILEY. For example, on or about February 13, 2023, at approximately 11:06 a.m., RILEY called CRAWFORD. The two had the following exchange:

CRAWFORD: Hey what's going on man?

RILEY: Hey, chillin um today either today or tomorrow.

CRAWFORD: I'll be up here for the next few hours, yo, so if that's cool if you want to get together by 12:00 I can, if not it will be a --

RILEY: Ugh, oh yeah okay if it's after 12:00 then it will be another day?

CRAWFORD: Yeah, I'm saying I'll be up here till after 12:00. I'm saying, you know, whatever way he floating umm. Just hit me I mean if I'm still here that's cool if not I'll just send this cat, but like I said I'll be here for sure to 12:00 to 1:00 o'clock.

RILEY: What about tomorrow?

CRAWFORD: I'll be back and forth. It's - tomorrow my granddaughter birthday, so depending if they wanna do something up here or down there.

RILEY: Alright um um.

CRAWFORD: That's what I wanna know, but like I said he, he close by too but like I said he running back and forth so either way we make sure. When you ready just hit me.

RILEY: I'ma, I needa, I needa talk to you before I do it.

CRAWFORD: Alright, so I'll come through either way before I leave no matter what.

RILEY: Alright

CRAWFORD: I'll give you a call before I get out of here.

17. At approximately 6:55 p.m., CRAWFORD called RILEY and stated, "Yo, I'm outside." At that time, law enforcement observed RILEY exit his residence in Elizabeth, New Jersey. Law enforcement then observed CRAWFORD's white Nissan van arrive and park nearby. RILEY approached the Nissan van and entered the front passenger seat. After approximately one minute, RILEY exited the Nissan van and returned to his residence.

18. On or about March 2, 2023, CRAWFORD delivered heroin and/or fentanyl to RILEY at RILEY's residence in Elizabeth, New Jersey. At approximately 7:16 p.m., CRAWFORD called WILLIAMS and stated, "I'm about to uhm... go see Red-ass and the barber and show him these f*cking pictures man." At approximately 7:34 p.m., law enforcement observed CRAWFORD arrive in one of his vehicles at Riley's residence in Elizabeth, New Jersey. Law enforcement observed RILEY approach the vehicle. After approximately five minutes, RILEY was observed walking away from the vehicle and returning to his residence.

19. On or about March 9, 2023, CRAWFORD delivered heroin and/or fentanyl to RILEY at RILEY's place of employment. At approximately 1:27 p.m., CRAWFORD called RILEY. RILEY told him that he was at his place of employment, and CRAWFORD said that he would be there in about an hour. At approximately 2:29 p.m., law enforcement observed CRAWFORD arrive in one of his vehicles at RILEY's place of employment in Elizabeth, New Jersey. RILEY approached CRAWFORD's vehicle, opened the passenger door and reached into the vehicle, and put something into his left pocket.

D. GILLIAM SUPPLIES HEROIN AND/OR FENTANYL TO T. GILLIAM

20. The investigation has shown that D. GILLIAM mixes heroin and/or fentanyl for T. GILLIAM and delivers it to T. GILLIAM. For example, on or about February 7, 2023, at approximately 5:13 p.m., D. GILLIAM called T. GILLIAM and the two had the following exchange:

T. GILLIAM: Yo.

D. GILLIAM: Yo what you, what you was doing?

T. GILLIAM: I was just trying to call you, that's what I was doing.

D. GILLIAM: Oh yeah.

T. GILLIAM: Yeah, what's up.

D. GILLIAM: Yo, how you made out?

T. GILLIAM: Yo, man listen man, I was going to call you because why he called me yesterday. I just didn't get a chance to call you. He said, he said, you – Cuz, he said that's some system I made up man. He said the only thing that sh*t do is he said it don't have no taste or nothing. He said the only thing it will do is put you to sleep and it make you dehydrated and sh*t.

D. GILLIAM: Yeah, well we know that.

T. GILLIAM: Yeah, you know, so he was like, uh if I was you, Cuz, I wouldn't even f*ck with that. He said it don't have no taste or nothing.

D. GILLIAM: Ah that's cause you left it like that, you keep giving it to him like that, you can't keep doing that.

T. GILLIAM: What do you mean? What you talking about you can't keep giving it to him? How you going to give it to him?

D. GILLIAM: You got to put more on it, man. That's what I'm... I told you that.

T. GILLIAM: Yeah, but I'm saying those were the -- the ones you gave me I gave him. [Voices Overlap] I never gave him no more.

D. GILLIAM: That was just like in that bag.

T. GILLIAM: Yeah, yeah, so you know what I mean.

D. GILLIAM: I told you all that, you didn't, you didn't listen.

T. GILLIAM: Yeah, but I gave the bag, I didn't go in the plastic, I gave him the bag.

D. GILLIAM: I said them was the same that was in the plastic.

T. GILLIAM: I know you said that, but I'm just saying, I never asked what's in the plastic to do that, so.

D. GILLIAM: Well you shouldn't even gave him that, I told you that.

T. GILLIAM: Yeah well I'm saying, but bro you already know what the f*ck you doing, so it don't even matter. You know what I mean, I'm just telling you what he told me, yesterday when he called me yesterday morning, that's all I'm doing. Know what I mean?

D. GILLIAM: [Aside] Let me get a napkin. Alright.

T. GILLIAM: Huh?

D. GILLIAM: Nah, I thought you said that um, I thought you said -- nah, nah, nah, I told you if not you had to put some more on that sh*t.

T. GILLIAM: Yeah, well I'll see.

D. GILLIAM: Well, you probably, what he taking sticks and all that too.

T. GILLIAM: Nah he don't, nah you know he got five sense man, he don't take sticks and none of that sh*t.

D. GILLIAM: Nah.

T. GILLIAM: Nah he don't take sticks. Now you know [Voices Overlap] Now K was like -- now K was like, you know this is before why he called me back yesterday, K was like bro that sh*t is a winner, he said it's a little too strong, he said you know, but it made me start feeling like I felt before when I went out. He said, but it wasn't that strong like that, he said I was able to catch it, so I said I just

went home and you know, cured out. You know what I mean? But he said he was like, yo, but that's a winner though. You know what I mean?

21. Similarly, on or about March 4, 2023, at approximately 8:46 p.m., D. GILLIAM called T. GILLIAM. The two had the following exchange:

T. GILLIAM: He said he can't taste it bro. It was a little weak, he said, then, when I give him the other one, he said I can taste that, I can feel that now, you know what I mean?

D. GILLIAM: You give him which one?

T. GILLIAM: C'mon, you not even [U/I] the one you wanted to know about, look what I text you.

D. GILLIAM: Yeah.

T. GILLIAM: He said.

[Voices Overlap]

D. GILLIAM: Yeah.

T. GILLIAM: I asked him, [U/I] right? He said for a minute, he said is a little weak. He said I can taste it though, but it hitting, but it hitting a little weak, so about five minutes later, I give him the other one.

D. GILLIAM: Mhm

T. GILLIAM: He took a hit for a minute, he like nah, I can feel that one, I can taste, I can feel that one.

D. GILLIAM: Mhm. You talking about the big one you have?

T. GILLIAM: He said he can feel that one.

D. GILLIAM: Yeah, I put that brown sh*t on that, so now what I got do, I gotta put some of the brown sh*t on that on bro.

. . . .

D. GILLIAM: You still, you still got enough for that one I give you I wanted to know about right?

T. GILLIAM: Yeah, yeah, I made, I made up like uh.

[Voices Overlap]

D. GILLIAM: Aight.

T. GILLIAM: I send him two, I made up like six or seven of them, yeah.

22. On or about March 13, 2023, D. GILLIAM told T. GILLIAM that he was mixing a batch of heroin and/or fentanyl and that he would bring it to him the next day. The next day, D. GILLIAM traveled to T. GILLIAM's residence. Based on the context of the communications and the investigation to date, law enforcement believes that D. GILLIAM brought that batch of heroin and/or fentanyl that he mixed the day before.

23. On or about March 13, 2023, at approximately 10:03 a.m., T. GILLIAM called D. GILLIAM. The two had the following exchange:

D. GILLIAM: Yo.

T. GILLIAM: What's up bro?

D. GILLIAM: Did "Bag" check that out?

T. GILLIAM: Nah man sh*t I was probably sleeping when that n**** came in, sh*t.

D. GILLIAM: Huh?

T. GILLIAM: I said I was probably sleeping when that n**** came in. I don't -- no I haven't seen him yet.

. . . .

D. GILLIAM: Hey, remember I told you I was going to take the ten and put the four in it. That's what I just did so.

T. GILLIAM: Oh, ok.

D. GILLIAM: What I'm doing now is putting something together for that n**** that sent me the text.

T. GILLIAM: Huh?

D. GILLIAM: I'm putting something together for that n**** that sent me the text.

. . . .

T. GILLIAM: Oh, cause you making something for the n**** that text you, oh ok.

D. GILLIAM: Yeah, when he get off work he got it. Then I really know then he can go in on that sh*t right here. Then I'm going to bring you some tomorrow to get a solid answer from your people too. As long as your people tell me something, I know what to do. But I don't want to just go (inaudible).

T. GILLIAM: I know, you go all the way in and it ain't right you're f*cked -- yeah -- yeah.

D. GILLIAM: Sh*t, you know what you got tell your boy [redacted]?

T. GILLIAM: What's that?

D. GILLIAM: You got to tell him like look, I need you to be straight up like -- this sh*t be going somewhere.

T. GILLIAM: You said I need to tell him -- I need him to be straight up? That n**** do be straight up. What you talking about?

D. GILLIAM: No what I'm saying like -- you want to know how long it could hold and everything. That's the main thing, the hit and the hold. That's all they be looking for. The shooters are looking for the zing and all of that.

T. GILLIAM: (Grunts) No it, definitely don't.

24. The next day, March 14, 2023, law enforcement conducted various forms of surveillance and observed that D. GILLIAM traveled from his residence in Alburtis, Pennsylvania to T. GILLIAM's residence in Elizabeth, New Jersey.

**T. GILLIAM AND D. GILLIAM SUPPLY HEROIN
AND/OR FENTANYL TO BAKER**

25. As noted above, the investigation has shown that D. GILLIAM and T. GILLIAM supply heroin and/or fentanyl to BAKER.

26. For example, on or about November 30, 2022, BAKER picked up heroin and/or fentanyl from T. GILLIAM's residence to sell to a law enforcement agent acting in an undercover capacity (the "UC"). At approximately 9:48 a.m., BAKER texted T. GILLIAM and stated, "Peace Big Bruh. Lemme know when You're ready fir Me." Approximately three minutes later, T. GILLIAM responded, "Okay big dropping off to me now I'll hit you when he get here." At approximately 10:00 a.m., law enforcement observed, via fixed surveillance, an individual known to law enforcement arrive at T. GILLIAM's residence and depart approximately three minutes later. At approximately 10:04 a.m., T. GILLIAM called BAKER and told him he could "come on." At approximately 10:23 a.m., law enforcement observed BAKER arrive at T. GILLIAM's residence. T. GILLIAM exited his residence and entered the front passenger seat of BAKER's vehicle. Approximately one minute later, T. GILLIAM exited the car. Ten minutes later, BAKER texted the UC to arrange to meet. At approximately 11:15 a.m., BAKER sold the UC ten bricks of a substance that subsequently field-tested positive for the presence of fentanyl in exchange for approximately \$1,500. At approximately 11:46 a.m., BAKER called T. GILLIAM to tell him he was "pulling up." Law enforcement observed BAKER arrive back at T. GILLIAM's residence. T. GILLIAM entered the front passenger seat of BAKER's vehicle and exited approximately three minutes later.

27. Similarly, on or about February 7, 2023, BAKER received heroin and/or fentanyl from T. GILLIAM at T. GILLIAM's residence. Specifically:

- a. On or about February 7, 2023, the UC contacted BAKER to conduct a controlled purchase of fentanyl. BAKER told the UC, in sum and substance, that he would have to check with his supplier before agreeing to meet with the UC. BAKER then immediately contacted T. GILLIAM and told him that he had to see him. T. GILLIAM responded that he would have to "make up two of them though." BAKER responded that was fine and that he was supposed to meet the buyer at 11.
- b. At approximately 11:06 a.m., law enforcement observed BAKER arrive at T. GILLIAM's residence in Elizabeth. T. GILLIAM exited the residence, walked to Baker's vehicle, and conducted a hand-to-hand transaction. T. GILLIAM returned to his residence. BAKER then departed the area.

- c. At approximately 11:17 a.m., BAKER sold the UC ten bricks of a substance that subsequently field-tested positive for the presence of fentanyl.

28. On or about February 10, 2023, BAKER relayed to D. GILLIAM what purchasers/users of D. GILLIAM's heroin and/or fentanyl said about the most recent batch. At approximately 1:08 p.m., BAKER and D. GILLIAM had the following telephone conversation:

BAKER: What's good?

D. GILLIAM: Sh*t, what's good with you?

BAKER: Ain't nothing. Yeah, I took a minute to get back to you 'cause the people I had let check that out, I just asked 'em, the shoot joint, that you know I'm saying, the nasal joint, they said it was decent but it, it kept putting them to sleep. Like it was like... [Chuckles] it put them to sleep or some sh*t. But the other cat said that the shoot joint, it was like he said it basically, like it was some type of feel like it kept putting him to sleep and it had they mouth dry as hell or whatever.

D. GILLIAM: Okay.

BAKER: Know what I mean? But look, it took me that long. At first, I'm sitting here, I was like damn, I hope this mother f*cker ain't do this sh*t and died. 'Cause I ain't speak to the mother f*cker in like three days and I just rode past and they explained to me now, he's like... 'cause he had my number but he said he had put the number in wrong. So, I said, "look, I don't want to give Bro a bad- a f*cked up read. I want to make sure it was what it was. So, I just got -- that was basic, the basic of read back from him.

D. GILLIAM: It's too strong for him.

BAKER: Yeah.

D. GILLIAM: That mean it too strong.

BAKER: Yeah, he said yeah, they said the sh*t was just -- he said him and ol' boy, they kept the main line and they said it just it kept putting him out. But

then, they mouth was dry as hell, like [U/I] or some sh*t. And um, the other, on the other coin, the chick was like, that's basically what she said, like as soon as she did it, it put her straight out. So, I said, either it's too strong or I don't know, whatever, what they...

D. GILLIAM: Yeah, nah, that sh*t too strong then.

29. Law enforcement believes that prior to a controlled purchase on or about February 23, 2023, BAKER retrieved heroin and/or fentanyl from T. GILLIAM at T. GILLIAM's residence. Specifically:

- a. On or about February 23, 2023, at approximately 9:04 a.m., the UC contacted BAKER to conduct a controlled purchase of heroin. BAKER and the UC agreed to meet at 11:00 a.m.
- b. Pursuant to intercepted wire and electronic communications, BAKER and T. GILLIAM agreed to meet at T. GILLIAM's residence in Elizabeth at approximately 11:00 a.m.
- c. At approximately 10:47 a.m., BAKER's vehicle, was observed via fixed surveillance and GPS data arriving at T. GILLIAM's residence. At approximately 10:49 a.m., T. GILLIAM was observed exiting the front door of T. GILLIAM's residence, walking to BAKER's vehicle, and entering the front passenger seat. After approximately four minutes, T. GILLIAM exited BAKER's vehicle and returned to his residence.
- d. While under law enforcement surveillance, BAKER traveled from T. GILLIAM'S residence to meet with the UC. Once there, BAKER sold the UC ten bricks of suspected heroin and/or fentanyl.

30. On or about March 21, 2023, law enforcement executed judicially authorized search warrants at several locations associated with the DTO, including a location in the Bronx, New York, used by the DTO to manufacture and package heroin and/or fentanyl (the "Mill"). During the search of the Mill, law enforcement recovered approximately ten kilograms of a substance suspected to be fentanyl and/or heroin, along with other indicia of narcotics distribution. At the time that law enforcement arrived, defendant Abinader Liriano Balbuena was operating the Mill.