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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	<b>COMPLAINT</b>
	:	
v.	:	
	:	
JOHNATHAN ARCE,	:	Honorable Jessica S. Allen
a/k/a “Buck,”	:	
JAQUAN BEARD,	:	
a/k/a “Yaya”	:	
JOSE CORREA,	:	
WILBERTO COTTO,	:	Mag. No. 24-8131
a/k/a “Willie,”	:	
REINALDO CRUZ,	:	
a/k/a “CaChito,”	:	
JOSEPH FELICIANO,	:	
STEVEN GARCIA,	:	
a/k/a “Fruity,”	:	
JOEL HERNANDEZ,	:	<b><u>FILED UNDER SEAL</u></b>
a/k/a “Wells,”	:	
ADOLPHUS HUNTER,	:	
JERMAINE JONES,	:	
a/k/a “Stacks,”	:	
CARLOS LOPEZ,	:	
GEORGE LOPEZ,	:	
a/k/a “Adrian Torres,”	:	
a/k/a “Boog,”	:	
TYREE MALONE,	:	
a/k/a “Malone,”	:	
DAVID QUINONES,	:	
a/k/a “Bird,” and	:	
NELSON VALENTIN,	:	
a/k/a “Lil Nel”	:	

I, Nicholas Jentz, 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 Drug Enforcement Administration, and that this criminal complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

*s/ Nicholas Jentz*

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Nicholas Jentz, Special Agent  
Drug Enforcement Administration

Nicholas Jentz, Special Agent with the Drug Enforcement Administration, attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 15th day of May 2024.

*s/ Jessica S. Allen*

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Hon. Jessica S. Allen, 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 November 2023 through in or around May 2024, in Essex County and Union County, in the District of New Jersey and elsewhere, defendants,

**JOHNATHAN ARCE,  
a/k/a “Buck,”  
JAQUAN BEARD,  
a/k/a “Yaya”  
JOSE CORREA,  
WILBERTO COTTO,  
a/k/a “Willie,”  
REINALDO CRUZ,  
a/k/a “CaChito,”  
JOSEPH FELICIANO,  
STEVEN GARCIA,  
a/k/a “Fruity,”  
JOEL HERNANDEZ,  
a/k/a “Wells,”  
ADOLPHUS HUNTER,  
JERMAINE JONES,  
a/k/a “Stacks,”  
CARLOS LOPEZ,  
GEORGE LOPEZ,  
a/k/a “Boog,”  
a/k/a “Adrian Torres,”  
TYREE MALONE,  
a/k/a “Malone,”  
DAVID QUINONES,  
a/k/a “Bird,” and  
NELSON VALENTIN,  
a/k/a “Lil Nel”**

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); and 100 grams or more of a mixture or

substance containing a detectable amount of heroin, a Schedule I controlled substance, and 40 grams or more of a mixture or 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).

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

**COUNT TWO**

**(Possession with Intent to Distribute Methamphetamine and Cocaine)**

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, defendant,

**GEORGE LOPEZ,  
a/k/a “Boog,”  
a/k/a “Adrian Torres,”**

did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, and 500 grams or more of a mixture or substance containing a detectable amount of cocaine, both Schedule II controlled substances.

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

**COUNT THREE**

**(Possession of Firearms in Furtherance of a Drug Trafficking Crime)**

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, defendant,

**GEORGE LOPEZ,  
a/k/a “Boog,”  
a/k/a “Adrian Torres,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute methamphetamine and cocaine, as charged in Count Two of this Complaint, did knowingly possess firearms, namely a 9mm Masterpiece Arms MPA Defender, bearing serial number FX17998, and a 40-caliber Glock 23, bearing serial number WKD971.

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

**COUNT FOUR**

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

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, defendant,

**GEORGE LOPEZ,  
a/k/a “Boog,”**

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess firearms and ammunition, namely a 9mm Masterpiece Arms MPA Defender, bearing serial number FX17998; a 40-caliber Glock 23, bearing serial number WKD971; and 14 rounds of ammunition, and the firearms and ammunition were in and affecting interstate commerce.

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

## ATTACHMENT B

I, Nicholas Jentz, am a Special Agent with the Drug Enforcement Administration (“DEA”). 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 and/or translations 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 September 2023, the DEA, along with state and local law enforcement agencies, has been investigating a drug trafficking organization (the “DTO”) that distributes cocaine, cocaine base (“crack cocaine”), heroin, fentanyl, and methamphetamine among other controlled substances. The DTO includes Johnathan Arce, a/k/a “Buck” (“ARCE”); Jaquan Beard, a/k/a “Yaya” (“BEARD”); Jose Correa (“CORREA”); Wilberto Cotto, a/k/a “Willie” (“COTTO”); Reinaldo Cruz, a/k/a “CaChito” (“CRUZ”); Joseph Feliciano (“FELICIANO”); Steven Garcia, a/k/a “Fruity” (“GARCIA”); Joel Hernandez, a/k/a “Wells” (“HERNANDEZ”); Adolphus Hunter (“HUNTER”); Jermaine Jones, a/k/a “Stacks” (“JONES”); Carlos Lopez (“C. LOPEZ”); George Lopez, a/k/a “Boog” (“G. LOPEZ”); Tyree Malone, a/k/a “Malone” (“MALONE”); David Quinones, a/k/a “Bird” (“QUINONES”); and Nelson Valentin, a/k/a “Lil Nel” (“VALENTIN”) (collectively, the “DEFENDANTS”). The DTO operates in and around Union County and Essex County, New Jersey and elsewhere. The investigation has revealed that several members of the DTO are members or associates of the street gang known as the Almighty Latin Kings & Queens Nation (the “Latin Kings”).

2. During the course of 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 unlawful activities. As set forth throughout this Criminal Complaint, these wiretaps, in conjunction with mobile and fixed surveillance, lawful seizures, and controlled 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 to distribute controlled substances.



3. The investigation has revealed that CRUZ, FELICIANO, HERNANDEZ, and QUINONES distribute controlled substances on behalf of the DTO in and around Essex and Union County, New Jersey. Based on the investigation, the DTO uses, among other places, a residence located on Emmet Street in Newark, New Jersey (the “Emmet Street Location”) and a storefront called “Foreign Smoke” located on South Orange Avenue in Newark, New Jersey (the “Smoke Shop”) as drug distribution locations. BEARD, CORREA, COTTO, GARCIA, HUNTER, JONES, C. LOPEZ, MALONE, and VALENTIN, in turn, receive controlled substances, often from one of these two locations, and distribute them on behalf of the DTO. ARCE serves as a source of supply of controlled substances for the DTO. And G. LOPEZ provides advice and connections regarding sources of supply of controlled substances from jail while he and his wife receive cash from the DTO.

**DEFENDANTS ARE MEMBERS AND ASSOCIATES OF THE LATIN KINGS STREET GANG<sup>1</sup>**

4. Communications intercepted pursuant to Court Orders authorizing the interception of wire and electronic communications, social media posts, consensually recorded conversations, law enforcement surveillance, and other lawful investigative methods have established the affiliation of many of the DEFENDANTS with the Latin Kings and their commission of criminal acts in furtherance thereof. For example, on or about April 23, 2024, CRUZ and G. LOPEZ had the following exchanges regarding Latin Kings meetings and retribution against fellow Latin Kings members, including by QUINONES, following an incident involving CRUZ’s son:

CRUZ: Hey twin, I’m glad you called twin. Twin, I’m about to snap, twin.

G. LOPEZ: What happened?

CRUZ: I’m about to snap, twin, I swear to God I’m bust one of these n[\*\*\*]as ass this morning. These n[\*\*\*]as gonna go to my son’s house, Little D and like five other bros gonna go to Little Ray’s house, right. Busted his car window, applied pressure on him right.

...

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<sup>1</sup> The Latin Kings are a violent international street gang that was originally formed in Chicago in the mid-1960s by individuals who had immigrated from Puerto Rico. The gang expanded significantly in the following decades. The Latin Kings are highly organized, and gang leadership exists at the national, regional, and local levels.

G. LOPEZ: Yeah, that's what it be, like these n[\*\*\*]as be straight clowning on hood n[\*\*\*]a and our hood ain't doing shit.

[Voices overlap]

CRUZ: Like come on, man, like... we gon' be stand up or what's good, my n[\*\*\*]a. Like word is bond, mother fuckers should be like, "Look, ya'll don't want to do nothing, man, like **I don't even want to be King no more, n[\*\*\*]a.**" I'll do this for myself, my n[\*\*\*]a. Beef with everybody, I don't give a fuck, n[\*\*\*]a.

...

CRUZ: And then my n[\*\*\*]a just on Saturday right, Bird brother **just knocked some King n[\*\*\*]a out** from Rahway, right. Put him in front of a thousand brothers, you hear me?

G. LOPEZ: Yeah.

CRUZ: And then go on Instagram and was like, "Yo, anybody from Elizabeth or Rahway feel any type of way what I did, let's go." N[\*\*\*]as tucked their fucking tail. Come on, man, these n[\*\*\*]as is bitches, man. N[\*\*\*]as hide behind this nation man. Just hide behind this shit, man. I don't need this shit, man.

5. The following day, April 24, 2024, CRUZ said to an unidentified fellow Latin Kings member: "I'm trying to go for that n[\*\*\*]as crown. I really want to beat him up just, just, just max out on that n[\*\*\*]a. Word up, but man... but if I can get that n[\*\*\*]as crown I'mma, I'mma terrorize him." Based on my training and experience I know that "Taking someone's crown," indicates the expulsion of a member of the Latin Kings. In addition, members of the DTO including DEFENDANTS COTTO, CRUZ, C. LOPEZ, G. LOPEZ, FELICIANO, GARCIA, refer to each other as "Twin," which is a common greeting among members and associates of the Latin Kings.

### **THE DTO POSSESSES FIREARMS IN CONNECTION WITH NARCOTICS TRAFFICKING**

6. The DEFENDANTS are known to possess firearms in connection with the activities of DTO. For example, on or about April 6, 2024, during a phone call, FELICIANO is heard in the background saying to unknown individuals: "Hey yo, yo, clear this shit the fuck up before I start shooting, yo. Man, suck my dick. On your kids stop playing before I start shooting yo. Clear my shit up, bro. Clear my shit up

before I start shooting, yo. Hey yo! Get the strap!” Based on my training and experience, I know that “strap” is slang for a firearm.

7. In addition, on or about January 15, 2024, CRUZ and G. LOPEZ had the following conversation, indicating that QUINONEZ and CRUZ jointly purchased a firearm:

CRUZ: I don’t feel good about Bird.

G. LOPEZ: You should probably cut him off. He still owe you?

CRUZ: Yeah. That’s why I’m trying to get all my money from him so I can stop fucking with him. So we had bought a strap. Aight yo, I bought it with my money thinking the n[\*\*\*]a would give me half. I need that shit, I’m gonna go on and grab my shit too.

8. On or about May 3, 2024, CRUZ and an unknown male (“UM-1”) discussed a firearms transaction, in which UM-1 sent CRUZ a photograph of a black revolver and stated, “but it’s silver,” and that it’s “fresh.” Later that day, UM-1 texted CRUZ “I’m about to ride to e.o... I’ll see you when I get back.”

### **SEIZURES OF NARCOTICS INVOLVING THE DTO**

9. During the course of the charged conspiracy, law enforcement, through the use of an undercover law enforcement officer (“UC”), has conducted controlled purchases of narcotics from CRUZ. The DTO has also sold controlled substances to buyers and re-distributors, including transactions done or facilitated by CRUZ. Additionally, controlled substances were seized from DTO members, including HUNTER, VALENTIN, QUINONES and JONES. The purchases made by the UC, as well as the seizures of narcotics from these buyers, re-distributors, as well as the seizures from members of the DTO, are summarized below.<sup>2</sup>

Date	DTO Member	Drug	Amount
12/4/2023	CRUZ	Heroin and Fentanyl	4 bricks <sup>3</sup>
12/13/2023	CRUZ	Fentanyl	10 bricks
12/26/2023	HERNANDEZ	Cocaine	78 grams

<sup>2</sup> All amounts are approximate. Unless otherwise indicated, all substances have either been field tested or laboratory tested positive for controlled substances or are believed to be controlled substances based on packaging and appearance.

<sup>3</sup> A “brick” is a term used to refer to fifty individual glassines of heroin or fentanyl. A “bundle” is a term used to refer to ten individual glassines of heroin or fentanyl. Each brick contains approximately one gram of heroin or fentanyl.

2/1/2024	HUNTER	Cocaine, Heroin, Ecstasy/MDMA, Oxycodone	Various quantities
2/23/2024	VALENTIN	Crack cocaine	22.5 grams
4/12/2024	CRUZ	Heroin	1 brick
4/13/2024	JONES	Crack Cocaine Cocaine	63.4 grams 26.2 grams
4/20/2024	QUINONES	Crack Cocaine	31 grams

**GEORGE LOPEZ’S ARREST ON FIREARMS AND DRUG CHARGES**

10. On or about September 12, 2023, law enforcement executed a judicially authorized search warrant for a storage unit in Union, New Jersey, that was maintained by G. LOPEZ (the “Storage Unit”). In and around July 2023, law enforcement observed G. LOPEZ making hand-to-hand narcotics transactions from a black Jeep Grand Cherokee (the “Jeep”). Surveillance footage shows G. LOPEZ store the Jeep inside the Storage Unit overnight. Surveillance footage of G. LOPEZ showed him drive a BMW to the Storage Unit in the morning, take the Jeep, then return the Jeep later in the day and drive the BMW out of the area. G. LOPEZ’s name was identified on the Storage Facility’s tenant list.

11. A search of the Storage Unit revealed two firearms and ammunition, including a 9mm Masterpiece Arms MPA Defender, bearing serial number FX17998, with a 30-round high-capacity magazine; a 40-caliber Glock 23, bearing serial number WKD971; and 14 rounds of ammunition, all of which were in and affecting interstate commerce. The Storage Unit also contained narcotics, including approximately 3,369 grams of suspected cocaine; and approximately 15,000 multi-colored tablets of methamphetamine. A search warrant executed at the residence of G. LOPEZ’s in Newark, New Jersey on or about September 12, 2023, revealed a key ring containing both a key to the Storage Unit and a key to the Jeep, as well as a money counting machine.

12. During a conversation on or about January 20, 2024, between G. LOPEZ and ARCE, who was speaking over CRUZ’s phone while accompanied by CRUZ, G. LOPEZ confirmed his ownership of the firearms, ammunition, cocaine, and methamphetamine found in the Storage Unit, stating: “They didn’t find nothing in my house. *They found the shit in my storage facility*, and my storage facility was in Union.”

13. G. LOPEZ was arrested on or about September 12, 2023, and has been detained at Hudson County Correctional Center (“HCCC”) since approximately that date. As is detailed below, recorded jail calls indicate that G. LOPEZ has participated in the charged conspiracy from jail.

14. On or about May 23, 2018, G. LOPEZ was convicted of manufacturing, distributing, or dispensing, or possessing with intent to manufacture, distribute, or

dispense, a controlled dangerous substance, in violation of N.J.S.A. § 2C:35-5(a)(1), an offense punishable by imprisonment for a term exceeding one year, for which G. LOPEZ was sentenced to a term of imprisonment of five years.

**REINALDO CRUZ (A/K/A “CACHITO”) PARTICIPATED IN THE  
NARCOTICS TRAFFICKING CONSPIRACY**

15. The investigation has revealed that CRUZ traffics controlled substances—including cocaine, cocaine base, heroin, fentanyl, and methamphetamine—in Elizabeth, New Jersey, Newark, New Jersey, and elsewhere. For example, CRUZ sold approximately four bricks of heroin and fentanyl to the UC on or about December 4, 2023, and ten bricks of fentanyl to the UC on or about December 13, 2023. Both transactions occurred outside of the Emmet Street Location. Over the course of the investigation, law enforcement has observed, through fixed and mobile surveillance, members of the DTO—including CRUZ, FELICIANO, HERNANDEZ, and QUINONES—distribute narcotics out of the Emmet Street Location.

16. The investigation has revealed that CRUZ provides narcotics to co-conspirators and members of the DTO on consignment sometimes referred to herein as “fronting”. The co-conspirators pay CRUZ after they have sold their supply of narcotics provided by CRUZ. For example, during a recorded jail call on or about January 9, 2024, CRUZ explained to G. LOPEZ that he was able to continue the narcotics trafficking operation of the DTO in part because he had half a kilogram of cocaine “on the street”, to be sold by co-conspirators:

G. LOPEZ: You don’t have nothing to keep you going right now? Nothing?

CRUZ: Yeah. I got bread. I got like 300. Know what I’m sayin. And I got a like half on the street. **I got like a half on the street.** Bird I can use to give me five. Mother fuckin my man [U/I] 400. And then Willie got me for 50.

17. On or about March 24, 2024, CRUZ had the following conversation in which an unidentified male (“UM-2”) claimed that he had received 95 grams of cocaine instead of the agreed-to 100 grams of cocaine from CRUZ, but UM-2 was unable to return this cocaine because he had already “mixed” it:

CRUZ: Yo.

UM-2: Yo, **you was short five dollars.**

CRUZ: You crazy. Can’t be no short five dollars. You crazy?

UM-2: Nah, but I don't even-- I don't even-- like I do, you don't even understand how I be coming, bro. I don't even play like that.

CRUZ: Five dollars? Nah, hell no.

UM-2: I'm telling you, bro. I'm deadass, that's what it was.

CRUZ: **95? You better check your scale, papi.**

UM-2: Nah, my shit right, bro.

CRUZ: I'm telling you, I just broke all that shit down all in hundreds.

UM-2: Listen, bro. I'm telling you, bro. I don't even play like-- I don't even-- I do too much business like I don't even- It is, and I'm telling what it is, brother.

CRUZ: A'ight, brother.

UM-2: A'ight.

CRUZ: I'll hit you back.

UM-2: Alright.

CRUZ: A'ight.

Approximately two minutes later, CRUZ called the unidentified male back. The two men continued their conversation:

UM-2: Hello.

CRUZ: Hey yo, you far from where you... where I'm at?

UM-2: Nah.

CRUZ: A'ight, **just bring it all back.**

UM-2: I done did what I did what I did with that already. **I done mixed it already.**

CRUZ: But, nah- nah- nah- nah- nah- nah. My shit... 'cause I know my shit ain't five short my n[\*\*\*]a. I know that for a fact.

UM-2: Hey, brother.

CRUZ: For a fact.

UM-2: A'ight, see if...

CRUZ: So, I don't know whatever you did, that's why I told you, bring it back... I'll show you on my scale that, that shit say one point... one point five because of the uh, the bag. All my shit's say that. Feel me? So, I don't understand how you're five short. And then, you did what you did and then you called...

[Voices overlap]

UM-2: Hey yo, I'ma call...

CRUZ: That's, **that's our business.**

[Voices overlap]

UM-2: Hey.

CRUZ: **That's my business right there.**

UM-2: I'll talk to you later, brother. Later, brah.

CRUZ: A'ight.

**GEORGE LOPEZ (A/K/A "BOOG") PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

18. The investigation has revealed that G. LOPEZ, while in jail, gave instructions to CRUZ regarding narcotics trafficking and allowed CRUZ to use his cellular telephone to sell narcotics. For example, during this investigation the UC used a cellular telephone number previously used by G. LOPEZ to coordinate a narcotics transaction on or about December 4, 2023, with CRUZ. On or about December 14, 2023, CRUZ and G. LOPEZ had a conversation acknowledging that this had occurred using G. LOPEZ's phone:

CRUZ: You know some blanco named Chris. I don't know some white boy. He called your phone. He called for papers. You heard, he called for papers.

G. LOPEZ: Nah.

CRUZ: Fuck you mean nah, I just gave that n[\*\*\*]a five bricks n[\*\*\*]a.

19. 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 “papers” to be coded language used to refer to wax baggies of heroin or fentanyl. Later in the same conversation, CRUZ explained to G. LOPEZ that CRUZ used G. LOPEZ’s phone to contact Dominican narcotics suppliers who would not answer calls from CRUZ’s phone. G. LOPEZ, in turn, advised CRUZ to speak with the father of the Dominican contact, whose father was the “plug,” or source of supply:

CRUZ: The only reason I got that phone was the Dominicans, that’s the only number they fucking respond to, bro. I called from my number they did not answer. I ain’t got nothin’ bro, at all.

...

CRUZ: It’s his father, his father’s the plug

G. LOPEZ: Well then tell that n[\*\*\*]a you want to holla at his father, n[\*\*\*]a.

20. On or about January 7, 2024, G. LOPEZ sent CRUZ a message advising him to “go shopping” for a source of narcotics supply, and recommending that CRUZ bring VALENTIN with him: “U gonna have to go up dat way and go shopping. Look around. Its worth it Twin. Wenrva u have time, spin dat way. Just don’t go alone. Have Nel with u. Dats a good n[\*\*\*]a to have on the squad. He’s loyal.”

21. On or about April 4, 2024, FELICIANO explained to another person that CRUZ picks up pills as a favor to G. LOPEZ (“Boog”):

FELICIANO: And she knows n[\*\*\*]as is losing right now because he keep saying himself. [U/I] I got to get some pills, I got to [U/I] and get some pills. He hasn’t been up there.

OTHER: So is it that he he didn’t go?

FELICIANO: He hasn’t [Stammers] I guess, you know that’s not important to him. You get what I’m saying, so like, that shit right there it’s just. **That’s really Boog’s situation.** You feel me? **So he’ll do that shit on a hum bug for Boog,** type of shit. You get it? That’s what he do it for, but he keeps saying he gotta go up there, like. You know what I mean, he keeps saying it.



22. The investigation has revealed that CRUZ provides proceeds from the sale of narcotics to G. LOPEZ and G. LOPEZ's wife. For example, on or about March 19, 2024, CRUZ told G. LOPEZ that he would give G. LOPEZ's wife \$3,000 ("3 bands") every month: "So look, listen right, tell wifey right, that on the 5th, I'ma get her them 5 bands plus 3 bands on top of that shit. So every 5th of the month, I'ma give her 3 bands." In addition, on or about March 30, 2024, CRUZ and G. LOPEZ had the following conversation with G. LOPEZ's wife ("WIFE") in the background, in which CRUZ agreed to send money to G. LOPEZ's wife:

G. LOPEZ: Hey yo, you ain't got none of that CashApp yet? I was gonna tell you give my wife some couple of dollars so she could do it.

CRUZ: I got you, I'll give it to her.

G. LOPEZ: Give her like... put my wife on real quick.

CRUZ: Hold on.

WIFE: Hello.

...

G. LOPEZ: You got money in your CashApp?

WIFE: Oh, my God, why you always do that to me when I'm here?

G. LOPEZ: No, just check because Cachito gonna give you some money.

WIFE: Okay. What you want me to send?

G. LOPEZ: Like 100 dollars.

**JOSEPH FELICIANO PARTICIPATED IN THE NARCOTICS  
TRAFFICKING CONSPIRACY**

23. The investigation has revealed that FELICIANO sells narcotics, including out of the Emmet Street Location. FELICIANO's name appears on the subscription information for the power company account registered to the Emmet Street Location.

24. For example, on or about March 9, 2024, FELICIANO and CRUZ had the following conversation in which FELICIANO requested 80 grams of cocaine (“raw”) from CRUZ:

CRUZ: Yo.

FELICIANO: Uhmm. 80 the other way.

CRUZ: What you say?

FELICIANO: 80 the other way. Yeah.

CRUZ: Raw?

FELICIANO: Yeah. Tell him to come down?

CRUZ: Yeah, I’m in the hood. I’ll be right over there.

FELICIANO: Alright, I’m a tell him to come down then.

Just under an hour later, FELICIANO called CRUZ. CRUZ stated, “I’m here, twin,” to which FELICIANO replied, “Oh, aight.” Law enforcement surveilled CRUZ at the Emmet Street Location on or about March 9, 2024.

**DAVID QUINONES (A/K/A “BIRD”) PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

25. The investigation has revealed that QUINONES sells narcotics, including out of the Emmet Street Location on behalf of the DTO. On or about February 11, 2024, QUINONES was arrested in Elizabeth, New Jersey and charged with wandering/prowling to obtain/distribute a controlled dangerous substance, in violation of N.J.S.A. 2C:33-2.1(b). On or about February 12, 2024, CRUZ and G. LOPEZ discussed that QUINONES’s arrest was in connection with the DTO, because QUINONES (“Bird”) was driving CRUZ’s van. CRUZ also noted that QUINONES was not arrested with “work,” which based on my training and experience I understand to mean a quantity of controlled substances:

G. LOPEZ: You see my message?

CRUZ: Nah, n[\*\*\*]a amy fucking van in the pound bro, got locked up n[\*\*\*]a.

G. LOPEZ: Who, Bird?

CRUZ: Yeah.

G. LOPEZ: Aw, shit. What the fuck happened.

CRUZ: He didn't get caught with no work, though, he had a warrant.

G. LOPEZ: But he was driving the van?

CRUZ: Yeah...

26. In addition, QUINONES facilitates narcotics sales by sending potential buyers to CRUZ. For example, on or about March 16, 2024, QUINONES and CRUZ had the following exchange:

CRUZ: Yo.

QUINONES: Yo, Chi?

CRUZ: Yo.

QUINONES: Yo, uhm, remember the moreno with the dreads from the hood that be buying the little zip from you?

CRUZ: Yeah.

QUINONES: Is it okay if I give him your number?

CRUZ: Yeah.

QUINONES: Alright, I'm about to give him your number.

CRUZ: Alright.

27. QUINONES also receives distribution-level amounts of cocaine from CRUZ to sell on behalf of the DTO. For example, on or about March 20, 2024, CRUZ supplied QUINONES with 200 grams of cocaine:

QUINONES: Yo, where you at, Chi?

CRUZ: I'm about to leave my house.

QUINONES: I need 200.

CRUZ: A'ight.

QUINONES: A'ight.

Approximately 41 minutes later, QUINONES called CRUZ and stated, "I'm outside, yo, about to come in."

28. In addition, on or about April 7, 2024, FELICIANO facilitated a resupply of 100 to 150 grams of cocaine to QUINONES for resale on behalf of the DTO:

FELICIANO: Yo.

QUINONES: Hey, yo, yo, where you at?

FELICIANO: At the car wash.

QUINONES: You at the car wash?

FELICIANO: Yeah.

QUINONES: You know where Chi put the shits at?

FELICIANO: Do I know where Chi put the what at?

QUINONES: The work.

FELICIANO: I know where Chi work at.

QUINONES: Yeah, that's what I'm saying, **I'm on my way out there, like 100... 150.**

FELICIANO: Oh.

...

FELICIANO: Aight, welll I'm on line, I'm trying to get a car wash.

QUINONES: You good, you good. I'll call you when I'm there. Aight, aight.

29. On or about April 20, 2024, QUINONES was arrested by the New Jersey State Police after he was observed conducting a hand-to-hand narcotics transaction. QUINONES was found to be in possession of approximately 31 grams of suspected crack cocaine and a large amount of cash. The next day, on or about April 21, 2024, BEARD and CRUZ discussed QUINONES's arrest. CRUZ stated that QUINONES had just left the Smoke Shop, at the time of the arrest, and that it was fortunate that the crack cocaine was not bagged up to suggest distribution:

CRUZ: ...You heard what happened to Bird yesterday, right?

BEARD: Yeah, mother fucking, um, who told me? Uh BG told me. Cause I went down there like just to see who was outside type shit cause it was nice. He told me. He was like, “Yo, uh, State came and got him.” I said, “Huh? What you was talking ‘bout, State came.” He said, “Yeah, they came and got Bird, like they either they was wathing him making sales out here.” I’m like, “Huh? N[\*\*\*]a you losing me.” They told me like, yo, like.

CRUZ: You know what’s the crazy shit? He wasn’t even making no sales. **He just had left the smoke shop, pulled up at the hood.**

BEARD: The crazy thing is, I had just, I had, I had rode through the hood. When I rode through the hood he was leaving. I guess he was leaving to come to the shop. Like I was driving through. He was leaving from down there.

CRUZ: And they jumped out on him.

...

BEARD: But he home now right?

CRUZ: Yeah, he came home last night.

BEARD: Oh, a’ight. Cause I was [U/I] booked and everything. I’m like, bro, didn’t n[\*\*\*]a just say bro got locked up? He’s not up there.

CRUZ: Thirty grams. Thirty something grams. **He got caught with thirty something grams.**

BEARD: Huh? Oh my fucking God, bro.

CRUZ: Yup.

BEARD: Yo, that shit getting out of hand.

CRUZ: **The only good part none of it was bagged up. It was all in one piece.**

**JOEL HERNANDEZ (A/K/A “WELLS”) PARTICIPATED IN THE  
NARCOTICS TRAFFICKING CONSPIRACY**

30. The investigation has revealed that HERNANDEZ sells narcotics, including out of the Emmet Street Location. On or about December 26, 2023,

HERNANDEZ was arrested in connection with a motor vehicle stop in Elizabeth, New Jersey. HERNANDEZ was found to be in possession of approximately 78 grams of crack cocaine, a digital scale, and other indicia of distribution.

31. HERNANDEZ (a/k/a “Wells”) has been referenced in discussions between co-conspirators CRUZ and FELICIANO regarding the sale of narcotics. For example, on or about March 9, 2024, CRUZ and FELICIANO discussed a sale of narcotics to a certain individual (“Individual-1”), and CRUZ instructed FELICIANO to contact HERNANDEZ to complete the transaction:

CRUZ: Yo.

FELICIANO: Hey Chi, [Individual-1] outside Chi.

CRUZ: Alright.

FELICIANO: Aight

CRUZ: It’s on the table, should be on the table.

FELICIANO: I’m not there yet... Oh alright.

CRUZ: Hit Wells up

FELICIANO: Alright.

32. Later that day, CRUZ fielded a complaint from Individual-1 about the quality of a batch of pills sold by CRUZ, which was limiting Individual-1’s ability to make a profit. During the conversation Individual-1 indicated that he had spoken with HERNANDEZ, and CRUZ indicated that HERNANDEZ was successful selling the pills:

CRUZ: Hello.

Individual-1: Hey Chi.

CRUZ: Who this?

Individual-1: What’s up big boy? This [Individual-1].

CRUZ: What’s good bro?

Individual-1: What’s going on with you. Alright, so I just talked with “Crack” and Wells earlier right. Those, them throwbacks, them shits ain’t... I was trying... So I got 90 of them left. I’ll hold the other ten on me.

If you could switch them out for something different.  
Them shit ass.

CRUZ: What you mean?

Individual-1: They ass bro.

CRUZ: What you mean?

Individual-1: Like.

CRUZ: Bro, you the only person that said that, my n[\*\*\*]a.

Individual-1: Listen, I'll take these shit.

CRUZ: Yeah, them n[\*\*\*]as taking too. **Wells want them shits all day everyday.**

Individual-1: Yeah. The n[\*\*\*]as I'm giving them to, they not feeling them bro. I'm just...

CRUZ: Yeah, I'm listening, what's up.

Individual-1: I'm saying, it ain't like I'm saying I don't want no other pills. I'm just asking you to switch them.

CRUZ: That's the only pills we got right there my n[\*\*\*]a. You the only one that said that. Everybody else going crazy on this shit. Word is bond, no bullshit, ask Young. Know I'm saying? Probably the people you giving them to, they probably trying finesse you or something, I don't know.

Individual-1: But I'm saying like. Like [Voices Overlap] I'll take them.

[Voices overlap]

CRUZ: You the only person. Yeah, I don't take them shits back.

Individual-1: I'm not, I'm not.

CRUZ: Them n[\*\*\*]as take them shits all day.

Individual-1: That's what I'm telling you, I'm not getting no bread from them. That's what I'm saying.

CRUZ: Bird. I don't know, you the first person that said that my boy, no bullshit. You heard?

Individual-1: Yeah.

CRUZ: So what you trying to do? Like let me know. What you trying to do? Talk n[\*\*\*]a.

Individual-1: I'm trying. I need something different.

CRUZ: Ain't no more other pills but those, so. You know what I mean? I can't swap them out 'cause you gon' get the same pills.

Individual-1: Yeah.

CRUZ: Know I mean? How I'ma give you something different, I give you the same shit. I ain't no fuck n[\*\*\*]a like that.

Individual-1: Aight.

CRUZ: You feel me?

Individual-1: Yeah.

CRUZ: Now, I'll reimburse you your money but right now in this moment I can't 'cause I got a lot of shit going on, but I'll give you your bread back.

Individual-1: Alright.

CRUZ: You give me them pills back and I'll give you your bread back.

Individual-1: Alright cool.

CRUZ: No problem, alright. Just hit me back in like an hour, I'ma let you know where I'm at.

Individual-1: Aight bet.

33. Approximately four minutes later, CRUZ and FELICIANO had a conversation regarding this complaint, in which FELICIANO acknowledged that Individual-1 had raised the complaint with HERNANDEZ:

FELICIANO: Chi.



CRUZ: Yo.

FELICIANO: Yeah, I'm at that house. What you want me to do?

CRUZ: Your boy said them pills garbage.

FELICIANO: That's what he just called me to say, he told that to Wells.

CRUZ: I'm like bro, it's impossible, you want your money back, I'll give you, your money back, ain't no problem.

**JERMAINE JONES PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

34. The investigation has revealed that CRUZ and JONES routinely conduct narcotics transactions in furtherance of the DTO. For example, on or about April 9, 2024, CRUZ called JONES to arrange to drop off 300 grams of cocaine. During the call, CRUZ also states that he is waiting to receive payment ("bread") from JONES:

CRUZ: You sleeping n[\*\*\*]a?

JONES: Nah.

CRUZ: Alright, look, hey yo, I'm about, I'm about to come by and snatch that up then on my way back down, I'ma give you the 300.

JONES: You don't have nothing?

CRUZ: Yeah, I got to, I just got to pick it up n[\*\*\*]a. I been waiting for you to get that bread n[\*\*\*]a.

JONES: Oh man, alright.

CRUZ: Alright, it's going to be probably like half hour, not even.

JONES: Alright.

CRUZ: Alright.

Approximately 18 minutes later, CRUZ called JONES again to tell him that CRUZ could pick up the narcotics from the Emmet Street Location and provide them to JONES after they had been packaged ("I just got to go bust shit open"):

JONES: Yo.

CRUZ: Yo, he's already on Emmet, so I'm about to just go right here pick it up, bring you that and line up one bird with one stone alright.

JONES: You said, it's already, alright.

CRUZ: It's already on Emmet, I just got to go bust shit open and do all that other shit.

JONES: Okay, I'm here.

Approximately 52 minutes later, CRUZ called JONES and said: "I'm here."

35. On or about April 13, 2024, law enforcement executed a judicially authorized search warrant of a residence where JONES is known to reside related to state charges for aggravated assault and unlawful possession of a handgun. JONES was not at home during the search. Law enforcement recovered, among other things, approximately 63.4 grams of suspected crack cocaine and approximately 26.2 grams of suspected cocaine from the top of cabinets in the kitchen, as well as approximately \$10,501 cash and a digital scale commonly used to weigh narcotics. Later that day, JONES and CRUZ had a conversation in which JONES acknowledged that the narcotics were his, and that he had recently "cooked" his supply of powder cocaine into cocaine base, or crack cocaine:

CRUZ: I got you n[\*\*\*]a, you know I got you.

JONES: I got more left.

...

JONES: Gotta hit the ground running though, bro. They took everything, bro. And then they wasn't even coming for that.

CRUZ: They was coming for a whole DV.

JONES: Well, they was coming for that "ag assault" shit...

...

JONES: Yup. That's what fucked me over, bro. **I had just cooked that shit and the little bit I had left, I had it like on a plate, on the top of the fucking counter on the top of like my uh... cabinets.** A fucking little bit of fucking shit, man.

...

JONES: Um, yeah. I'm 'bout to hit the ground running bro, because I need money. They just took 20, uh 12 grand from me, bro. And I, and I just make a sweat though. I just had 30 in that bitch.

36. On or about May 1, 2024, JONES and CRUZ spoke about the money that JONES owed to CRUZ for cocaine. JONES said that he would be "ready" with the full payment owed to CRUZ the following day, that he could get \$6,000 out of his house to provide CRUZ that day ("I'ma go get you 6 out the house"), and that he still had approximately 100 grams of cocaine to sell ("I still got like a hundred"):

CRUZ: Yo.

JONES: What's good n[\*\*\*]a?

CRUZ: What's good my boy?

JONES: Shit, what's up with you?

CRUZ: Shit, I'm here putting something together.

JONES: You'll be ready for me uh, maybe later today, possibly tomorrow?

CRUZ: I'm saying, nah, if you give me all the money today, I could be ready for you today. I just need to... know I mean?

JONES: Aight. Look, 'cause I ain't done yet but I know I'ma be done by tomorrow. And I don't even wound up being short on the 1st.

CRUZ: Um-hmm.

JONES: I'ma get you uh... I'ma go home and give you what I got.

CRUZ: Okay.

JONES: I got damn near all of it right now. I'm probably just gonna owe you a band when I finish.

CRUZ: Aight. That's cool 'cause that'll keep me going.

JONES: Aight, so **I'ma go get you 6 out the house.**

CRUZ: Aight.

JONES: So that'll be 9. Being there.

CRUZ: Okay.

JONES: Aight. I'ma do that in a few. Once I finish up there, I'ma do that.

CRUZ: Aight. The sooner the better.

JONES: Cause I still got this, I'ma play with it from my pocket. **I still got like a hundred.**

CRUZ: Okay.

JONES: Aight. Uh, what time?

CRUZ: Whenever you ready, n[\*\*\*]a. Whenever you ready, just hit me.

JONES: Aight, I'ma hit you like 12:00.

CRUZ: Aight.

Several hours later, JONES was observed several times entering and exiting an apartment occupied by an individual with whom JONES is understood to be in a relationship. Another several hours later, JONES called CRUZ to explain that he could give CRUZ \$5,000: "I'ma have you just pull up to the gym. I'ma send you the gym addy. I gotta come... I got five for you right now." Approximately 19 minutes later, CRUZ called JONES, and JONES told CRUZ, "aight two minutes, I'll be right there," to which CRUZ responded, "I'm in the back... I'm all the way in the back." Shortly following the time of this call, law enforcement observed JONES and CRUZ drive in different cars into the same parking lot near a "Planet Fitness" gym and conduct an exchange with CRUZ. CRUZ handed JONES a black shopping bag that law enforcement suspects contained cocaine. JONES was seen counting money before handing the money and a different bag back to CRUZ.

### **JOHNATHAN ARCE (A/K/A "BUCK") PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

37. The investigation has revealed that ARCE supplies cocaine to CRUZ and the DTO. For example, on or about January 15, 2024, CRUZ told G. LOPEZ that shortly before CRUZ was robbed CRUZ gave ARCE ("Buck") \$20,000 in exchange for two kilograms of cocaine ("I was buying two . . ."), and that ARCE had also given him two kilograms of cocaine on consignment (" . . . and he was throwing me two"):

CRUZ: Ya know what's crazy, n[\*\*\*]a, the day before everything happened, I just gave the n[\*\*\*]a like 20,000.

G. LOPEZ: Who?

CRUZ: Ol' boy... Buck

G. LOPEZ: Oh yeah yeah

CRUZ: I was buying two and he was throwing me two.

G. LOPEZ: That shit'll come back, Twin. Believe it or not, it's gonna come back.

38. On or about February 2, 2024, CRUZ and G. LOPEZ discussed CRUZ's need to increase his narcotics supply. G. LOPEZ suggested that CRUZ could purchase from ARCE ("Buck"), and CRUZ replied that he had sold ("ran through") the narcotics that CRUZ acquired from ARCE via ARCE's "man in Mexico," and that CRUZ had paid ARCE for the narcotics ("a straight dub"):

G. LOPEZ: What's up with Buck Tooth?

CRUZ: **Um, his man in Mexico, right. He gave me one, right. I ran through what he gave me. I gave him a straight dub for it,** you feel me, to knock off my shit from the back, now I'm at like fourteen, I'm at fourteen but he went to Florida yesterday and said he will be back next Saturday. [inaudible]

G. LOPEZ: At least he ain't bullshitting you know what I saying.

CRUZ: Nah he said when I get back, Ima do better for you, so you can get out that bean. I mean he's doing 17 right now that good, [inaudible] I got the plan

G. LOPEZ: Yeah, he knows though

CRUZ: Yeah, I gave him a straight dub. He the only n[\*\*\*]a who don't call me being like "yo" "yo" he don't do none of that

G. LOPEZ: Buck Tooth?

CRUZ: I said Buck Tooth, he don't do that. If he call then like, like he did today, that's cause he's wants some ballie. [marijuana]

G. LOPEZ: Yeah.

39. On or about April 11, 2024, CRUZ and ARCE had a conversation in which they agreed to meet at ARCE's house: "Go to my house, you'll see, I'm right

here.” Approximately fifteen minutes following this call, law enforcement observed CRUZ enter ARCE’s residence, then exit several minutes later carrying a weighted bag that law enforcement believes contained cocaine. A short while later on the same day, CRUZ and ARCE discussed the quality of the cocaine sold by ARCE to CRUZ. ARCE indicated that the cocaine could be “cooked” into serviceable crack cocaine, CRUZ noted that “you lose some” in so doing, and ARCE replied that he would “take the loss”:

ARCE: Yo, listen papi, nah, listen, I want to talk to you, remember that shit that we cleaned up, that’s fixed, that he cleaned it.

CRUZ: Yeah.

ARCE: Can you work with it?

CRUZ: Nah.

ARCE: ‘Cause we been fixing it...

CRUZ: Not really bro, ‘cause that shit, that shit...

[Voices overlap]

ARCE: **I thought when you cook it, it comes out good.**

CRUZ: **Yeah, it comes out good but you lose some though.**  
That’s the only thing.

ARCE: **N[\*\*\*]a, but listen, if we cook it up and I’ll take the loss.** We can cook up.

CRUZ: I don’t know, I gotta see ‘cause I could mix it with good shit. That’s what I’m saying. Know I mean? You heard?

40. On or about April 27, 2024, ARCE had a conversation with an unidentified male (“UM-3”) in which ARCE agreed to supply 100 grams of cocaine (“a hundo”). The following day, on or about April 28, 2024, ARCE and UM-3 had another conversation in which ARCE agreed to bring 100 grams of cocaine:

ARCE: Yo.

UM-3: Yo.

ARCE: What’s up Papito?

UM-3: What's up with you my n[\*\*\*]a? You be fucking shit up man.

ARCE: What you talking... you had called me for 100 and you never called me back.

UM-3: You called me, you called me earlier.

ARCE: Yeah.

UM-3: I'm talking about last night.

ARCE: I called you yesterday Papi.

UM-3: I know you called me, but you said you were gonna come back when you come out of the mall, and you never came.

ARCE: No n[\*\*\*]a, I said I was going to call you. I called you and you didn't call me back or nothing. Where you at? What you doing?

UM-3: I'm in my house, I just woke up, bro. About to make something to eat, I'm starving.

ARCE: I'm starving.

UM-3: Bring me that, **bring me that "hundo."**

ARCE: A'ight.

**NELSON VALENTIN (A/K/A "LIL NEL") PARTICIPATED IN THE  
NARCOTICS TRAFFICKING CONSPIRACY**

41. The investigation has revealed that VALENTIN traffics narcotics on behalf of the DTO. As discussed, on or about January 7, 2024, G. LOPEZ advised CRUZ to bring VALENTIN as an enforcer when CRUZ went "shopping" for a narcotics source of supply. *See* ¶ 20. In addition, on or about February 2, 2024, CRUZ told G. LOPEZ that VALENTIN had recently sold a high volume of narcotics on behalf of the DTO, stating that "Nel" is "popping off" and that "Nel got that shit going crazy ya heard? Like 150 a week."

42. Less than a week following this conversation, on or about February 8, 2024, VALENTIN was arrested in Elizabeth, New Jersey, after being observed conducting a suspected hand-to-hand narcotics transaction. VALENTIN was charged with possession of a controlled dangerous substance in violation of N.J.S.A. 2C:35-10(a)(1) and drug loitering, in violation of N.J.S.A. 2C:33-2.1B(2).

43. On or about February 23, 2024, VALENTIN was arrested in Elizabeth, New Jersey, while possessing approximately 22.5 grams of crack cocaine, and charged with possession of a controlled dangerous substance in violation of N.J.S.A. 2C:35-10(a)(1). On or about February 24, 2024, one day following VALENTIN's arrest, CRUZ told G. LOPEZ that VALENTIN had paid CRUZ ("pays me what he had to pay me") and acquired product from CRUZ ("[g]rabs some [U/I] shit") shortly prior to VALENTIN's arrest:

CRUZ: Look at this shit yesterday. Fuckin Nel comes out right. Boom, he pays me what he had to pay me, right. Grabs some [U/I] shit, right. And then he goes, [U/I] his fucking niece is like, "Nah, we ain't wilding with that." So they go to the house. Boom boom. Then he comes back to Elizabeth. He goes to Wawa and he parks. [U/I] Nice thing you know, a car pulls up and he jump out the car, the Mercedes Benz, and it's the police. He went right to the cop car.

G. LOPEZ: He went to go serve a cop car?

CRUZ: Nah, the police was just going there to get food inside the Wawa. And Nel just walked up to the car and he opened the door and got in the car.

**WILBERTO COTTO (A/K/A "WILLIE") PARTICIPATED IN THE  
NARCOTICS TRAFFICKING CONSPIRACY**

44. The investigation has revealed that COTTO traffics narcotics on behalf of the DTO. For example, on or about November 17, 2023, CRUZ told G. LOPEZ that COTTO was purchasing 100 grams of cocaine at a time from CRUZ ("up to a hundred"):

CRUZ: Yo the fuck where Willie at? Man I'm about to come back yo.

G. LOPEZ: You said Willie?

CRUZ: I gotta go to see this n[\*\*\*]a.

G. LOPEZ: Yo where Willie be at now?

CRUZ: At the uh, at the Royal.

G. LOPEZ: Oh, he be over there with Keon?



CRUZ: Nah, nah they in different rooms they be beefing over custies. Cuz now.

G. LOPEZ: Oh yea?

CRUZ: Yeah, now that fucking **Willie up to a hundred**... to a hundred. I told him n[\*\*\*]a make make make twenties n[\*\*\*]a like this big like that and I bet you they go fast and he about to pay me for the full hundred and I gave it to him on Tuesday.

G. LOPEZ: What, he he's doing good?

CRUZ: Yeah, he's doing real good, he about he's about to buy a car and everything.

45. In addition, in the following conversation on or about April 5, 2024, COTTO told CRUZ that he was out of narcotics, and CRUZ directed COTTO to come to the Emmet Street Location for resupply:

COTTO: Ah, why you don't love me no more, buddy? I'm out.

CRUZ: Buddy, I'm out here, you heard? I'm on Emmet.

COTTO: Aight. I'm on my way.

CRUZ: I'm here. Just come over here.

**JAQUAN BEARD PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

46. The investigation has revealed that BEARD traffics narcotics on behalf of the DTO. For example, on or about April 1, 2024, BEARD agreed to pick up 20 bricks of heroin from CRUZ at the Smoke Shop:

CRUZ: Yo.

BEARD: Yo.

CRUZ: What's up, papi?

BEARD: What's up, man? Are you- you in the area?

CRUZ: Yeah, I'm on South Orange Ave at the s...

BEARD: Damn.

CRUZ: What's up? Talk to me.  
BEARD: Twenty.  
CRUZ: Twenty?  
BEARD: Mm-hm.  
CRUZ: A'ight. Gimme like-- gimme like 20 minutes. A'ight?  
BEARD: Alright. Thank you.  
CRUZ: A'ight, my brother.

47. In addition, on or about May 6, 2024, BEARD arranged to travel to the Smoke Shop to pick up crack cocaine ("raw") and to give CRUZ money for the cocaine ("soft"):

BEARD: You at the shop?  
CRUZ: Yup.  
BEARD: Okay uh, you got raw?  
CRUZ: Yeah.  
BEARD: Aight, I'am about to make my way to you.  
CRUZ: I'm about to leave. What's up? Talk.  
BEARD: Nah, I got a player that needs 6 soft. [Pause] I was going to come uh, ... yeah I was about to leave now, I'll go come give you the money for the 6 soft.

**JOSE CORREA PARTICIPATED IN THE NARCOTICS TRAFFICKING  
CONSPIRACY**

48. The investigation has revealed that CORREA distributes narcotics on behalf of the DTO. For example, on or about April 19, 2024, beginning at approximately 11:18 a.m., CORREA and CRUZ had a conversation in which they agreed to meet at the Emmet Street Location. Approximately thirty minutes later, CORREA requested that CRUZ prepare him 10 grams of crack cocaine ("hard") and 5 grams of powder cocaine ("soft"):

CORREA: Hello.  
CRUZ: Yo.

CORREA: How far are you?  
CRUZ: I'm here.  
CORREA: Oh, aight. I'm about to walk over there.  
CRUZ: What you want me to get ready for you?  
CORREA: Uh... **10 hard and 5 soft.**  
CRUZ: Aight.  
CORREA: And whatever else, you know...  
CRUZ: I got you.  
CORREA: That's what I'm paying for. And what I owe you.  
CRUZ: Aight, I got you.  
CORREA: Aight.  
CRUZ: Aight.

On the same date at approximately 12:00 p.m., law enforcement observed CORREA arrive at the Emmet Street Location. CRUZ handed an item to a passenger in the vehicle that CORREA was driving, then the passenger handed CRUZ an unknown amount of cash.

49. On or about April 28, 2024, CORREA ordered 16 grams of crack cocaine and 5 grams of powder cocaine from CRUZ, who directed CORREA to the Smoke Shop:

CORREA: Yo, yo.  
CRUZ: What's good bro?  
CORREA: Where you want me to meet you at bro?  
CRUZ: Where you at?  
CORREA: I'm um, at exit 10.  
CRUZ: Aight, just come to um... go to the store.  
CORREA: To the store?  
CRUZ: On South Orange Ave. yeah.

CORREA: Where at?

CRUZ: The store you went to that time. The last time you came, to the store right there.

CORREA: Okay, alright.

CRUZ: Up there by um, my son's shop.

CORREA: [Audio Break] oh um, in um 271 [Building number]?

CRUZ: Yeah.

CORREA: I wasn't there the last time. I was by the other spot last time.

CRUZ: Yeah, yeah, but go there.

CORREA: Aight bro.

CRUZ: Aight.

CORREA: I'll meet you over there.

CRUZ: What you wanted?

CORREA: Well, **I want 16 hard and 5 soft. 'Cause I'm coming back Friday.**

CRUZ: Aight.

CORREA: Just to hold me off until Friday.

CRUZ: Aight bet.

CORREA: That's ... Aight.

CRUZ: **So you want 16 cooked, and 5 soft?**

CORREA: **Yes, 5 soft, yup.**

CRUZ: Aight. Aight

CORREA: Aight.

Approximately 43 minutes later, CORREA called CRUZ and stated "I should be pulling up in a minute."

50. On or about May 3, 2024, CORREA requested another resupply of 10 grams of powder cocaine and 5 grams of crack cocaine, and CRUZ directed CORREA to the Smoke Shop, noting that it was where CORREA “went the last time”:

CRUZ: Yo.

CORREA: Yo, yo.

CRUZ: What up papi?

CORREA: I’m about to jet, man, go see you. Where we at?

CRUZ: To the store. Where you went the last time, up there.

CORREA: Alright. But where we at?

CRUZ: Uh, you know where we at, n[\*\*\*]a. [Stammers] you know how much you owe me?

CORREA: I think so. Yeah, yeah, yeah.

CRUZ: Aight. Uh...

CORREA: 420, right?

CRUZ: Yup.

CORREA: Aight. And um... **I’m gonna need... 10, 10 regular and 5 hard.**

CRUZ: Aight, got you.

CORREA: Aight?

CRUZ: Aight.

CORREA: So I’ll be there, I’ll call you when I get there.

CRUZ: Aight.

CORREA: Aight.

Approximately one hour and forty-two minutes later, CORREA called CRUZ and stated, “Yo... I’m right here bro.”

**STEVEN GARCIA (A/K/A “FRUITY”) PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

51. The investigation has revealed that GARCIA distributes narcotics on behalf of the DTO. For example, on or about March 10, 2024, at approximately 10:46 a.m., GARCIA requested to purchase approximately 1,000 tablets (“a stack”) of ecstasy containing methamphetamine (“Es”) from CRUZ, who considered sending GARCIA to the Emmet Street Location and said he would call GARCIA back:

CRUZ: What’s up papi?

GARCIA: Where you at right now?

CRUZ: Right now I’m in North Newark, papi.

GARCIA: Alright.

CRUZ: Why?

GARCIA: You staying out there for a while?

CRUZ: Nah. Yeah, ‘cause I gotta go to a lil’ meeting and shit with my bros.

GARCIA: Okay. Uh... just call.... what time, about 2-3 hours?

CRUZ: Nah, hell no. About a hour. I got it with me.

GARCIA: Aight. **What the “E’s”**

CRUZ: Yeah, I got everything with me. Well, the “E”s” you could go right there to um... if these n[\*\*\*]as is up, **I could send you right there to Emmet.**

GARCIA: Yeah, I could do that.

CRUZ: Aight. **What you need a stack?** A’ight.

GARCIA: Yeah.

CRUZ: Aight. So I’m a uh, I’m a see if they up. Call you right back.

GARCIA: Aight.

Approximately one minute later, at approximately 10:47 a.m., CRUZ called GARCIA back, and instructed GARCIA to go to the Emmet Street Location to pick up the requested 1,000 ecstasy tablets from FELICIANO, and to pay FELICIANO for the

100 grams of cocaine that CRUZ had previously fronted (provided on consignment) to GARCIA (“the money for the 100”):

CRUZ: Yo. Go over there, go over there.

GARCIA: Aight.

CRUZ: Do you have anything?

GARCIA: Even the bread?

CRUZ: Yeah, give him... whatever you got, give it to him.

GARCIA: Aight.

CRUZ: **You put the money for the 100 there or no?**

GARCIA: I got half on me for that. Give it to him too?

CRUZ: Okay. Yeah, give it to him.

GARCIA: Aight.

CRUZ: Aight.

Approximately 12 minutes later, at approximately 10:59 a.m., GARCIA texted CRUZ, “5 min away.” Approximately four minutes after that, GARCIA called CRUZ and stated, “I’m outside,” to which CRUZ responded, “Aight, what you in?” GARCIA told CRUZ, “my white car.” Contemporaneously with this call, law enforcement observed GARCIA arrive at the Emmet Street Location driving a white Acura. FELICIANO exited the Emmet Street Location and handed GARCIA an item.

52. On or about April 12, 2024, GARCIA, via text message, requested 100 grams of cocaine from CRUZ, and CRUZ directed GARCIA to come to the Smoke Shop:

GARCIA: U around 100

CRUZ: Come to the store

GARCIA: Okay

Approximately ten minutes after this text message exchange, law enforcement observed CRUZ arrive at the Smoke Shop. Approximately 20 minutes later, GARCIA arrived at the Smoke Shop with another male, entered the Smoke Shop, and departed a few minutes later.

**ADOLPHUS HUNTER PARTICIPATED IN THE NARCOTICS  
TRAFFICKING CONSPIRACY**

53. The investigation has revealed that HUNTER distributes narcotics on behalf of the DTO. On or about February 1, 2024, HUNTER was arrested at his residence, where law enforcement recovered numerous indicia of drug trafficking and narcotics, including suspected crack cocaine, heroin, and pills. HUNTER was released from custody the following day. On or about March 22, 2024, HUNTER and CRUZ had a text message exchange in which HUNTER asked CRUZ to supply him with pills containing narcotics (“throwbacks”):

HUNTER: Good morning my boy... Hit me up when u start rolling

HUNTER: My boy???u got throwbacks need a hundo

CRUZ: I'm in Newark

HUNTER: No doubt

HUNTER: Holla when u touch back

CRUZ: Ok

HUNTER: U slow

54. On or about April 11, 2024, HUNTER sent CRUZ a message regarding the availability of ecstasy pills: “My boy ??u still dry wit da e.pills”.

55. On or about April 12, 2024, HUNTER sent CRUZ a message regarding the availability of crack cocaine: “Gd morning bra???u got hard”.

56. On or about May 6, 2024, law enforcement observed HUNTER conduct a hand-to-hand narcotics transaction outside of his residence. An unidentified male approached the building and handed HUNTER an unidentified amount of cash and in exchange HUNTER then handed the unidentified male a small item.

**CARLOS LOPEZ PARTICIPATED IN THE NARCOTICS TRAFFICKING  
CONSPIRACY**

57. The investigation has revealed that C. LOPEZ distributes narcotics on behalf of the DTO. For example, on or about March 30, 2024, CRUZ agreed to travel to C. LOPEZ to supply him with an unspecified quantity of narcotics:

CRUZ: Hello.

C. LOPEZ: What’s up buddy?



CRUZ: What's good?

C. LOPEZ: Uh, when you get a chance, **see if you could give me some five for seven.**

CRUZ: A what? Say that again, I can't hear you.

C. LOPEZ: The one for seven, remember you told me?

CRUZ: Yeah.

C. LOPEZ: So if you could bring me something, you know for seven.

CRUZ: A'right, I'ma pull up over there, give me like, give me like half an hour.

C. LOPEZ: Yeah, just take your time my brother, just serve me up when you're on your way, that I know you are on your way.

CRUZ: A'ight bet.

Approximately one hour later, law enforcement observed CRUZ exit the Smoke Shop with a garbage bag, which CRUZ placed in his car. Approximately 30 minutes later, law enforcement observed CRUZ arrive at C. LOPEZ's residence.

58. On or about May 3, 2024, C. LOPEZ and CRUZ had a text message exchange in which they made reference to the Smoke Shop, and CRUZ told C. LOPEZ that CRUZ was "coming your way twin". C. LOPEZ later messaged "highland", to which CRUZ replied "Ok". Law enforcement observed CRUZ and C. LOPEZ together outside of an address on Highland Avenue in Newark, New Jersey, close to C. LOPEZ's residence.

### **TYREE MALONE PARTICIPATED IN THE NARCOTICS TRAFFICKING CONSPIRACY**

59. The investigation has revealed that CRUZ supplies MALONE with narcotics, including cocaine, and that MALONE distributes narcotics on behalf of the DTO. For example, on or about April 19, 2024, CRUZ told MALONE that CRUZ did not have marijuana available, and MALONE replied that his customer wanted cocaine ("what we be doing"):

MALONE: Yo.

CRUZ: Hey yo.

MALONE: What up?

CRUZ: All the buds are gone. My son went to the show with it.

MALONE: Yeah I know.

CRUZ: Everything, oh a'ight I'm just letting you know a'ight.

MALONE: Yeah I know the shit. So nah he want what we be doing.

CRUZ: Oh okay.

MALONE: So I'ma call you in few. I got him on the other end.

CRUZ: A'ight bet.

The following day, on or about April 20, 2024, MALONE requested 150 grams of cocaine ("a dollar 50"), and CRUZ directed MALONE to the Emmet Street Location:

MALONE: Yo.

CRUZ: Ey, yo, what you need a 50?

MALONE: Nah, a dollar 50 a dollar 55. I ain't sure now. But uh...

CRUZ: You gotta let me know, my n[\*\*\*]a, so I can get the shit ready. I got mad other shit going on and I don't wanna have you waitin' all day, my n[\*\*\*]a. Cause I gotta go to Paterson. I gotta go to Jersey City so like

MALONE: Yeah, a'ight, say no more give me-

CRUZ: Yeah, gotta let me know.

[Audio break]

MALONE: Give me a dollar 50. Fuck that.

CRUZ: Huh?

MALONE: Let me get my shit now.

CRUZ: [Stutters] Yeah, cause I gotta do, I'll be in a lot of places right now.

...

MALONE: But uh, so uh, I'm right here by uh Downtown now. So I'll pull up.

CRUZ: A'ight.

MALONE: A'ight, you 'bout to head out?

CRUZ: I'ma have that ready for you.

MALONE: A'ight, say no more.

CRUZ: Nah, **I'ma have that ready for you. If, if anything [Audio break] down here on Emmet.**

60. On or about April 24, 2024, CRUZ sent MALONE a message requesting payment ("clear that tab") so that CRUZ would have the cash to purchase a resupply of three kilograms of cocaine ("my usual 3"): "What's good my boy i have people waiting on me i need you to clear that tab so i can start getting my usual 3".

61. Based on the investigation, MALONE resides on Johnson Avenue in Newark, New Jersey, where he was observed on May 1, 2024, entering a vehicle registered in his name. On or about May 7, referring to MALONE's Johnson Avenue location, CRUZ told G. LOPEZ that MALONE was selling half a kilogram of cocaine per week, stating that "big bro from Johnson" was "doing half a week" and that CRUZ "was dumping a half on him... I had that n[\*\*\*]a rocking."