

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ORIGINAL FILED
MAY 11 2026
CLERK, U.S. DISTRICT COURT - DNJ

United States of America)
v.)
JULE STUBBS)
)
)
)
)

Case No. _____
Mag. No. 26-mj-2032 (AMD)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2025 to May 2026 in the county of Cumberland and elsewhere in the
 District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Description of Offenses</i>
21 U.S.C. § 846 (contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(A))	See Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.



Complainant's signature

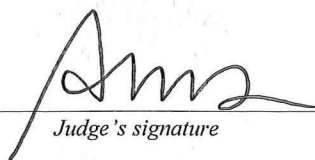
Kevin MacDowell, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/11/2026

City and state: Camden, New Jersey



Judge's signature

Hon. Ann Marie Donio, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: 
Jeffrey B. Bender, Assistant U.S. Attorney

Date: May 11, 2026

ATTACHMENT A

Between at least in or about August 2025 and in or about May 2026, in Cumberland County, in the District of New Jersey and elsewhere, the defendants,

ANDREW DAVIS, a/k/a “Flip Mogella,” a/k/a “Floss King,”

DAMION JONES,

CLIFFORD BROWN,

JAMES MCBRIDE,

and

JULE STUBBS,

did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and possess with intent to distribute at least 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, at least 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1-(2-phenylethyl) -4-piperidinyl] propenamide (“fentanyl”), and at least 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, all Schedule II controlled substances, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

ATTACHMENT B
AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTS

I. INTRODUCTION

I, Kevin McDowell, a Special Agent with the Drug Enforcement Administration (“DEA”), United States Department of Justice, being duly sworn, state as follows:

1. I am a Special Agent assigned to the Drug Enforcement Administration (“DEA”), New Jersey Division, Atlantic City Resident Office. I have been employed with the DEA since January 2022. Previously, I was a sworn law enforcement officer in Delaware from 2014 until 2022. Based on my training and experience, I am familiar with the methods of drug organizations and their operations, the terminology used by members of these organizations, and the measures they employ to distribute controlled substances and exert influence and control within the marketplace for illicit drugs. I am familiar with the means and methods used by drug traffickers to smuggle, import, and distribute controlled substances, and to conceal and launder of proceeds from the unlawful sale of controlled substances. I am aware that individuals involved in the illicit distribution of controlled substances routinely attempt to conceal their identities and the locations at which they conduct drug transactions. I also am familiar with the investigative techniques and practices utilized by law enforcement to investigate and dismantle drug distribution organizations, including T-III interceptions.

2. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part. When describing conversations or text messages, unless otherwise noted, I have provided a summary of those communications. When providing transcriptions of conversations, the monitor has listened to the conversation and provided a substantially verbatim transcript of the conversation accounting for the fact that the final transcripts of these conversations may contain minor edits for syntax or language, which would not bear on the overall substance or meaning of the conversation, as I have

reported and transcribed it herein.¹ Amounts, dates, and times are approximations, and should be read as on about, in about, or at about the date or time provided.

3. Because this Affidavit is being submitted for the limited purpose of setting forth probable cause for the issuance of the requested complaints and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to support issuance of the requested complaints and arrest warrants.

II. PROBABLE CAUSE

A. Drug Trafficking Organization (“DTO”) Members for Requested Complaints

4. ANDREW DAVIS (“DAVIS”), a/k/a “Flip Mogella,” a/k/a “Floss King”: DAVIS is a Jamaican citizen who lives in a residence in East Nottingham Township, Pennsylvania, and drives a Mercedes Benz referred to herein as “Davis’s Vehicle.” In 2016, DAVIS was sentenced in New Jersey Superior Court to 17 years’ and 8 years’ incarceration after convictions for conspiracy to distribute controlled substances/distribution of controlled substances and money laundering, respectively. DAVIS was paroled from New Jersey state prison in October 2022.

5. DAMION JONES (“JONES”): JONES lives in a residence in Vineland, New Jersey (“Jones House”), and owns/operates a restaurant located on West Main Street, Millville, New Jersey (“Jones Restaurant”). In 2010, JONES was sentenced in New Jersey Superior Court to terms of imprisonment of 5 years, 4 years, 7 years, and 8 years after convictions for drug distribution offenses. In 2020, JONES was sentenced in New Jersey Superior Court to terms of imprisonment of 3 years and 7 years after convictions for drug distribution offenses.

6. JAMES MCBRIDE (“MCBRIDE”): MCBRIDE lives on Woodhollow Drive, Marlton,

¹ Many of the pertinent intercepted communications were conducted in the Jamaican dialect of Patois. The contract monitors are fluent in Jamaican Patois and experienced in monitoring intercepted conversations in that language. For calls or portions of calls that were conducted in English, monitoring agents also listened to the intercepted conversations and confirmed the accuracy of the resulting transcript.

New Jersey (herein, "McBride House"). In 2006, MCBRIDE was sentenced in New Jersey Superior Court to a 9-year term of imprisonment for a drug distribution conviction. In 2014, MCBRIDE was sentenced in New Jersey Superior Court to a 16-year term of imprisonment for a drug distribution conviction that also involved DAVIS.

7. CLIFFORD BROWN ("BROWN") is a Jamaican citizen who lives in an apartment on Oak Lane, Philadelphia, Pennsylvania ("Oak Lane House"). In 2006, BROWN was sentenced in New Jersey Superior Court to probation after a drug distribution conviction. In 2012 and 2016, BROWN was convicted of being an alien unlawfully in the United States after a prior removal.

8. JULE STUBBS ("STUBBS"): STUBBS lives on Cedar Street, Millville, New Jersey ("Stubbs House"), and owns/operates a store located on North High Street, Millville, New Jersey ("Stubbs Restaurant"). In 2010, STUBBS was sentenced in New Jersey Superior Court to terms of imprisonment of 10 years and 5 years after convictions for drug distribution offenses.

B. Drugs Recovered From JONES's Storage Unit

9. On August 18, 2025, law enforcement officers observed DAVIS on a stationary surveillance camera arriving at the Jones House, removing what appears to be a heavy bag from his vehicle, entering the residence, and returning less than two minutes later with what appears to be a lighter or empty bag. Based on my training, experience, and knowledge of the investigation, I believe DAVIS brought controlled substances to the Jones House during this brief visit on August 18, 2025.

10. Raheem Hannah, who is charged in the Eastern District of Pennsylvania, had previously sold suspected drugs to a confidential source during controlled purchases and agreed to provide methamphetamine to the confidential source on August 19, 2025 as part of another controlled purchase. Law enforcement officers conducting surveillance on August 19, 2025 in advance of the controlled purchase observed Raheem Hannah arrive at and then depart the Jones House. Thereafter, agents surveilled Hannah go to a location in Millville. Meanwhile, JONES briefly entered and exited Unit 521

of a storage facility in Millville, New Jersey. JONES then proceeded to drive to Hannah's Millville location and meet with Hannah, after which they both drove away. Hannah proceeded to drive to a location in Pennsylvania that had been arranged to be the location of the controlled purchase. Hannah was arrested after arriving for the controlled purchase. Suspected controlled substances were later recovered from Hannah's automobile, which I believe JONES obtained from Unit 521 to provide to Hannah for further distribution.

11. On August 20, 2025, the Honorable Sharon A. King, U.S. Magistrate Judge for the District of New Jersey, authorized a warrant to search Unit 521, which had been rented in JONES's own name since January 2025. Law enforcement officers maintained constant surveillance of Unit 521 from the time JONES left Unit 521 on August 19, 2025 until agents executed the warrant during the morning of August 20, 2025. Shortly before agents executed the warrant on August 20, 2025, law enforcement officers observed JONES enter the premises of the storage facility, notice that Unit 521 was under surveillance, and depart the premises. When the warrant was executed, agents recovered from Unit 521: 5,339.2 grams of a substance confirmed by a DEA laboratory to be 96% pure methamphetamine hydrochloride; 969.1 grams of a substance confirmed by a DEA laboratory to contain fentanyl, carfentanil (a fentanyl analogue), and xylazine; a suspected cutting agent; and a kilo press used by drug distributors.

C. Search Warrant of DAVIS's Apple Account

12. As part of the investigation, the Honorable Sharon A. King, U.S. Magistrate Judge for the District of New Jersey, authorized a search warrant for DAVIS's Apple account. Apple's responsive data included a video dated August 1, 2025 in which DAVIS appears to be taking a video of bags that contain what appears to be large quantities of drugs of an unknown type. Below is a screenshot from 9 seconds into the 22-second video:



13. DAVIS's iCloud photographs had several pictures of shipping labels associated with the DTO:

- a. A photo dated August 14, 2025 was a picture of a shipping label addressed to an unknown house on Bridgewater Road in Aston, Pennsylvania. The photograph was a partial picture of the label and the house number of the residence was not visible. On January 9, 2026, a FedEx package was seized destined to a house on Bridgewater Road, Aston, PA containing approximately 5 pounds of suspected methamphetamine and 1 kilogram of suspected cocaine.
- b. A photo dated January 19, 2026 was a picture of shipping label destined to the Oak Lane House.
- c. A second photo dated January 19, 2026 was a picture of a shipping label addressed to an address on Nanticoke Court, Marlton, New Jersey. The photograph was a partial

picture of the label and did not show the shipping date. On February 27, 2026, a package destined to that address was seized and found to contain what was later confirmed by a DEA laboratory to be approximately 4,232.5 grams of methamphetamine hydrochloride and approximately 3,038.9 grams of cocaine hydrochloride.

- d. A photo dated February 12, 2026 was a picture of a shipping label addressed to an apartment on W. Broad Street, Palmyra, New Jersey. On February 17, 2026, agents observed DAVIS taking a package dropped off by FedEx at that address. After taking the package, DAVIS was observed giving a large bag to MCBRIDE.

D. DAVIS's Intercepted Communications

14. As part of the investigation, the Honorable Karen M. Williams, U.S. District Judge for the District of New Jersey, authorized the interception of communications from two phones used by DAVIS, identified herein as Target Telephone 1 and Target Telephone 2. Intercepted communications included admissions by DAVIS regarding his role in drug trafficking.

15. For example, on March 7, 2026, at approximately 3:06 p.m., law enforcement agents intercepted an incoming call to DAVIS over Target Telephone 1 from a phone believed to be used by S.L. (session #293). The following is an excerpt of this incoming call to DAVIS:

DAVIS: I'm just glad for my freedom. I'm not doing any boss thing because [INHALES] the boss thing nearly gave me life in prison! When they say you're the boss, when you get in trouble! Life they want to give me! Leader! You understand me?

S.L.: Yeah.

DAVIS: Yeah, so that's why I don't bother with the crowd and the many crews. Yeah, they are my friends and I love them and so on, but I can't bother with it. [INHALES] Because I don't want when the problem comes they try to take me down with organized crime, organized gang or none of those things! You understand me?!

S.L.: Yeah. [UNINTELLIGIBLE]

[VOICES OVERLAP]

DAVIS: Yeah, I'm done with those things.

S.L.: Yeah, stay away from that.
DAVIS: Yep.

16. Based on my training and experience and knowledge of the investigation, I believe the above-excerpted conversation reflects DAVIS explaining that he needs to avoid a leadership role in his drug trafficking activities to minimize his criminal exposure (“the boss thing nearly gave me life in prison”). DAVIS appears to be explaining that he has limited the number of co-conspirators (“I don’t bother with the crowd and the many crews”) with whom he interacts so that he minimizes his criminal exposure when he is caught (“when the problem comes”).

17. As a second example, on March 18, 2026, at approximately 3:36 p.m., law enforcement agents intercepted an incoming call to DAVIS over Target Telephone 1 from a phone used by an unknown female (“UF”) (session #1769). The following is an excerpt of this incoming call to DAVIS:

DAVIS: Well, listen, my bills used to be way more than that back in the days, but now, because I see the adjustment, I, I made sure to put it at a level where in case of anything, even if I’m not doing anything.
UF: Mm-hmm.
DAVIS: I can still get it done.
UF: Hmm.
DAVIS: I don’t want to put my hand too far where I cannot reach it.
UF: Yeah.
DAVIS: Swear to God.
UF: Mm-hmm.
DAVIS: I’ve been wanting a Lambo.
UF: Mm-hmm.
DAVIS: I’ve been wanting to change my vehicle.
UF: Mm-hmm.
DAVIS: I have to get a business first because then, I’m going to draw extra attention to myself and if the heat comes and the problems come, you will hear that I’m an idiot.
UF: Mm-hmm.
DAVIS: And this and that!
[VOICES OVERLAP]
UF: Yeah, you have to do the right thing.
DAVIS: So, I have to just suck it up. I just have to suck it up and just do what I have to do!
UF: You can’t let hype cause you to go do fuckery.
DAVIS: Exactly. Remember I went through it already, so what, what do I have to

prove to people?! I don't have anything to prove to anybody!
UF: Mm-hmm. Mm-hmm.
DAVIS: Whether I'm driving this or I'm driving anything at all, my name is still
the same!
UF: Mm-hmm. Remember you've been there, you know. So, you don't have to
chase anything at all.
[VOICES OVERLAP]
DAVIS: Yeah. Yeah, I'm not chasing anything.

18. Based on my training and experience and knowledge of the investigation, I believe DAVIS was explaining to the unknown female that he wanted to use his drug proceeds to purchase a Lamborghini ("I've been wanting a lambo") but was aware that he would first need a business that could appear to generate a legitimate source of income for him ("I have to get a business first because then, I'm going to draw extra attention to myself and if the heat comes and the problems come, you will hear that I'm an idiot.").

19. Intercepted communications also included communications between the DTO members regarding their drug trafficking activities, as confirmed by surveillance. For example:

April 10, 2026 – April 11, 2026

20. On April 10, 2026, at approximately 5:25 p.m., DAVIS arrived at the Oak Lane House, BROWN exited the Oak Lane House, BROWN placed a large brown bag into Davis's Vehicle, and DAVIS left.

21. On April 10, 2026, at approximately 6:14 p.m., DAVIS arrived at the McBride House and retrieved an item from his vehicle that DAVIS brought into the McBride House.

22. On April 10, 2026, at approximately 10:31 p.m., law enforcement agents intercepted an incoming call to Target Telephone 2 from JONES (session #17). The following is an excerpt of this incoming call to DAVIS:

D. JONES: Hey bro, what's ah ... we good, ah ... see throughting? [Phonetic]
DAVIS: What, the girl?
D. JONES: Nah, nah, nah, the other thing.
DAVIS: Yeah, yeah, yeah, yeah, yeah, definite.

D. JONES: A'right, um, let me put it together . I'm a, I'm a need something for tomorrow. Uhm, I might need you for a couple days. I mean, some ...

DAVIS: Uhmm.

D. JONES: Some...Because they, they, they keep calling for it, but I just, I just put some bread into these, uh, getting these, uh, pizza ovens and shirts started. [INHALES] But, uh, I got some money coming next week. You know I mean?

DAVIS: Mm hmm.

D. JONES: It aint even that. I probably got like five sold already. I just need more than that.

DAVIS: Yeah.

D. JONES: Yeah. So, um .. I, I hit you on ... I might go to my crib in a second. I'm, I'm a see what I got, and then I'm a call you back and let you know what I got.

DAVIS: Yeah, do that and call me so I can jump on it early in the morning; first thing in the morning.

D. JONES: A'right, got you. Cool.

23. On April 10, 2026, at approximately 10:52 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to JONES (session #21). The following is an excerpt of this outgoing call from DAVIS:

D. JONES: Yow bro.

DAVIS: Yeah.

D. JONES: Okay, yeah. I got ah, I got five grand right now, but um, ah, I'm a have another forty-five hundred (4500) by five o'clock tomorrow.

DAVIS: Mmhmm.

D. JONES: So ...

DAVIS: So what you want?

D. JONES: Ah ... let me do like ah, let me do like seven (7) again or something like that.

DAVIS: A'right cool. I'll see you in the morning.

D. JONES: A'right.

24. On April 11, 2026, at approximately 9:49 a.m., law enforcement officers observed DAVIS arrive at the Oak Lane House (the same address as seen in the January 19, 2026 photograph from DAVIS's Apple account). At approximately 9:53 a.m., law enforcement officers observed BROWN exit the Oak Lane House with two large brown bags, walk to an out-of-view area where DAVIS had parked minutes earlier in his vehicle, and return moments later without the bags to the Oak Lane House while DAVIS

drove away.

25. On April 11, 2026, at approximately 10:28 a.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to the JONES (session #23). The following is an excerpt of this outgoing call from DAVIS:

D. JONES: Yo, bro.
Huh?
DAVIS: Where you want me to come? The store or the house?
D. JONES: Uh, where you at right now?
DAVIS: On the bridge, on the bridge coming over.
D. JONES: Uh, head to the store. I'll be there by, by the time you get down here.
DAVIS: Mm-hmm.
D. JONES: Yeah. Alright.

26. On April 11, 2026, at approximately 11:16 a.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to JONES (session #25). The following is an excerpt of this outgoing call from DAVIS:

D. JONES: Yo, bro.
DAVIS: I'm in the back.
DAVIS: Alright. Nah...

27. At the same time as this 11:16 a.m. call, law enforcement agents conducting surveillance observed DAVIS arrive at the Jones Restaurant in Davis's Vehicle, JONES exit the Jones Restaurant while on the phone, JONES approach Davis's Vehicle, JONES appear to hand something to DAVIS, and JONES return to the Jones Restaurant with one of the brown bags that he obtained from DAVIS.

28. Based on my training and experience and knowledge of the investigation, I believe that JONES had already arranged for the distribution of a certain quantity of drugs but sought more than that quantity from DAVIS ("I probably got like five sold already. I just need more than that"). In their follow-up call, JONES indicated he currently had \$5,000 but would have another \$4,500 the following day and requested "seven again," which I believe likely refers to JONES ordering 7 pounds of methamphetamine from DAVIS. I believe the following morning, DAVIS obtained drugs from the Oak Lane House and

then asked JONES whether DAVIS should deliver the drugs to the Jones House or the Jones Restaurant, with JONES directing him to the latter. DAVIS arrived at the Jones Restaurant and provided a bag containing drugs to JONES, which JONES brought into the Jones Restaurant.

April 13, 2026

29. On April 13, 2026, at approximately 12:53 p.m., DAVIS arrived at the Oak Lane House in Davis's Vehicle, pulled out of view, and departed moments later.

30. On April 13, 2026, at approximately 1:48 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to JONES. The following is an excerpt of this outgoing call from DAVIS:

D. JONES: Yo, yo.
DAVIS: What's good?
D. JONES: What's going on, bro? Uh, I got it for you.
DAVIS: Alright, alright. [Unintelligible]
D. JONES: Okay.

31. On April 13, 2026, at approximately 1:55 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to STUBBS (session #39). The following is an excerpt of this outgoing call from DAVIS:

STUBBS: Yo?
DAVIS: What up?
STUBBS: Yo?
DAVIS: You back?
STUBBS: Yeah, I'm at the store.
DAVIS: You want me to go up there or you want me to come up to the house?
STUBBS: Huh?
[BACKGROUND: AUTOMATED RECORDING; Construction reported]
DAVIS: You want me go up there or you want me go to the house?
STUBBS: Um, you can take that to the crib. You can take that. You know I'm saying?
DAVIS: Alright, cool. I'm a go to the crib. I'll be there in like, probably like ten (10) minutes.
STUBBS: Uh, [Unintelligible] it's up to you, 'cause I can't be there in ten (10) minutes!
DAVIS: No! No! No! No! You ain't gotta rush. I just reached [Unintelligible]

STUBBS: Yeah.
[VOICES OVERLAP]
DAVIS: In about ten (10) fifteen (15) minutes, I should be there.
STUBBS: Yeah, you could drop that off there, if you want.
DAVIS: Alright. I'll do that.
STUBBS: Alright.

32. On April 13, 2026, at approximately 2:21 p.m., law enforcement agents observed Davis's Vehicle arrive at the Stubbs House. DAVIS exited Davis's Vehicle and appeared to be holding an unknown item in his arm. DAVIS entered the Stubbs House for a brief moment.

33. On April 13, 2026, at approximately 2:21 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to STUBBS (session #42). The following is an excerpt of this outgoing call from DAVIS:

STUBBS: Uh, um...
DAVIS: Yeah
STUBBS: Matter of fact; just stick it in my truck.
DAVIS: Alright
STUBBS: You hear me?
DAVIS: Alright. Which one?
STUBBS: Alright.
[VOICES OVERLAP]
DAVIS: The black one or the white one?
STUBBS: Put it in the white one.
DAVIS: Alright.
STUBBS: Alright.

34. On April 13, 2026, at approximately 2:21 p.m., law enforcement officers observed DAVIS exit the Stubbs House and walk to a white box truck, which was parked on the front lawn. Law enforcement officers observed DAVIS walk away from the box truck while no longer holding the unknown item, and DAVIS entered his vehicle and left the area.

35. On April 13, 2026, at approximately 2:29 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to the JONES (session #44). The following is an excerpt of this outgoing call from DAVIS:

DAVIS: [ASIDE: That I don't want today. I swear to God. I (Unintelligible)]
D. JONES: Yo.
DAVIS: See, I'm here. I'm here.
D. JONES: Alright. I'll be right there.

36. On April 13, 2026, at approximately 2:29 p.m., law enforcement agents observed Davis's Vehicle arrive at the Jones Restaurant. At approximately 2:30 p.m., JONES exited the Jones Restaurant holding what appeared to be a large amount of U.S. Currency. JONES approached DAVIS in Davis's Vehicle and handed DAVIS the money. After a short conversation, DAVIS departed from the area and JONES returned to the Jones Restaurant.

37. Based on my training and experience and knowledge of the investigation, I believe that the above calls and surveillance reflected DAVIS obtaining drugs from the Oak Lane House, JONES informing DAVIS that JONES had money for DAVIS ("I got it for you"), DAVIS querying STUBBS whether DAVIS should deliver drugs to STUBBS at the Stubbs House or the Stubbs Restaurant (with STUBBS directing DAVIS to the Stubbs House), DAVIS delivering drugs to STUBBS by placing it in the box truck ("Put it in the white one.") outside the Stubbs House, DAVIS driving to the Jones Restaurant, and JONES providing drug proceeds to DAVIS that JONES had kept within the Jones Restaurant.

April 18, 2026

38. On April 18, 2026, at approximately 4:19 p.m., law enforcement agents intercepted an incoming call to Target Telephone 2 from 856-XXX-4505 (session #103). Based on, among other factors, the timing of the call aligning with MCBRIDE's recent arrival at the McBride House ("I'm at home now"), common calls with 856-XXX-4505 and other numbers associated with the Davis DTO, and DAVIS's arrival at the McBride House later the same day (as set forth below), I believe that MCBRIDE is the male speaking with DAVIS on this intercepted call. The following is an excerpt of this incoming call to DAVIS:

DAVIS: Yo, Boo.
MCBRIDE: Yo, what's good?
DAVIS: Oh, you at work?

MCBRIDE: No, I'm at home now.
DAVIS: Oh, shit! So, I was planning to go and ... You know what I was talking about with PEP [Phonetic]?
MCBRIDE: Yeah.
DAVIS: You wa--, you want, you want the next half?
MCBRIDE: Um, I don't really need it, but, if you broke it down, you know, I'll take it.
DAVIS: Yeah, that's what I was planning to do, that's why. [Unintelligible] You know.
MCBRIDE: I'll take it. [Unintelligible]
DAVIS: Alright, cool. I'll let you know when I'm coming.
[VOICES OVERLAP]
MCBRIDE: [Unintelligible] Alright.
DAVIS: Yeah.

39. At approximately 4:24 p.m. (after the 4:19 p.m. call set forth above), DAVIS left a café that he frequents, drove in Davis's Vehicle directly to the Oak Lane House, carried a large weighted black trash bag from Davis's Vehicle into the Oak Lane House, exited the Oak Lane House about 14 minutes later carrying a small red canvas bag, and drove away. DAVIS drove to the Cherry Hill Mall parking lot, remained for about 30 minutes, and then drove to the McBride House, carried the red canvas bag from Davis's Vehicle into the McBride House, exited the McBride House with the red canvas bag about 10 minutes later, drove in Davis's Vehicle to STUBBS's house, exited Davis's Vehicle, walked briefly out of view, and then re-entered Davis's Vehicle. A few minutes later, STUBBS arrived in his black car, parked next to DAVIS in Davis's Vehicle, exited STUBBS's black car, approached Davis's Vehicle, retrieved the red canvas bag, and both individuals entered STUBBS's house. About three minutes after entering STUBBS's house, both individuals exited the house without the red canvas bag, entered their respective vehicles, and departed the area. DAVIS proceeded to drive back to the Oak Lane House.

40. Based on my training and experience and knowledge of the investigation, I believe that DAVIS told MCBRIDE that DAVIS planned to bring drugs to STUBBS and offered to provide half to MCBRIDE. MCBRIDE responded that he didn't necessarily need more drugs but agreed to take the drugs if DAVIS had broken it down, which I know to mean repackaging wholesale quantities of drugs into

smaller packaging (“I don’t really need it, but, if you broke it down, you know, I’ll take it”). DAVIS proceeded to take drugs from the Oak Lane House to MCBRIDE at the McBride House and to STUBBS (in the red canvas bag) before returning to the Oak Lane House.

April 20, 2026 – April 21, 2026

41. On April 20, 2026, at approximately 12:41 p.m., DAVIS arrived at the Oak Lane House in Davis’s Vehicle, appears to have been handed an item from BROWN while in Davis’s Vehicle, and departed the area. At approximately 2:18 p.m., DAVIS arrived in the vicinity of a gym in Evesham, New Jersey. MCBRIDE’s car—a Chrysler 300 that law enforcement officers have observed MCBRIDE driving during the course of the investigation—was in the same area at the same time.

42. On April 20, 2026, at approximately 2:44 p.m., law enforcement agents intercepted an incoming call to Target Telephone 2 from JONES (session #144). The following is an excerpt of this incoming call to DAVIS:

DAVIS: Yo, D.
D. JONES: What’s going on, bro?
DAVIS: Talk to me. What’s good?
D. JONES: Is everything good?
DAVIS: Yeah, everything’s good.
D. JONES: A’ight.
DAVIS: Uh ...
D. JONES: Twenty-seven (27).
DAVIS: Twenty-seven (27). Alright, cool.
D. JONES: A’ight.
DAVIS: Yeah.
D. JONES: I-- I got--What’s it named? I got twenty-four (24) right now, though.
DAVIS: Alright.
[UNINTELLIGIBLE and VOICES OVERLAP]
DAVIS: We’ll work it out.
D. JONES: A’ight. A’ight.
DAVIS: Mmm. Yeah.

43. On April 20, 2026, at approximately 4:39 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to JONES (session #155). The following is an excerpt of this outgoing call from DAVIS:

D. JONES: Yo?
DAVIS: I'm on Five-Five (5-5), probably like twenty (20) minutes away.
D. JONES: Alright.
DAVIS: Shop, right?
D. JONES: Huh?
DAVIS: Come to the shop?
D. JONES: Yeah.
DAVIS: Alright. Cool.

44. On April 20, 2026, at approximately 5:04 p.m., law enforcement agents intercepted an outgoing call from Target Telephone 2 to JONES (session #159). The following is an excerpt of this outgoing call from DAVIS:

D. JONES: Yo, bro.
DAVIS: I'm in the back.
D. JONES: Alright.

45. At about the same time as the 5:04 p.m. call, DAVIS arrived at the Jones Restaurant in Davis's Vehicle. JONES exited the Jones Restaurant and approached Davis's Vehicle holding what appeared to be a weighted brown paper bag that JONES handed to DAVIS. A few minutes later, JONES reached into Davis's Vehicle and retrieved a large weighted multicolored bag, which JONES brought into the Jones Restaurant.

46. Based on my training, experience, and knowledge of the investigation, I believe JONES provided \$24,000 in U.S. currency ("I got twenty-four (24) right now") to DAVIS in exchange for drugs of an unknown type within the weighted multicolored bag that DAVIS transported in Davis's Vehicle, which JONES proceeded to take into the Jones Restaurant.

May 3, 2026 – May 4, 2026

47. On May 3, 2026, at approximately 3:36 p.m., law enforcement agents intercepted an incoming call to Target Telephone 2 from JONES (session #215). The following is an excerpt of this incoming call to DAVIS from JONES:

D. JONES: Yo, bro. What's going on bro?
DAVIS: Talk to me. What's up?

D. JONES: Uh, uh, I need a uh, I need to jump in the water. Um, [PAUSE] uh ...
 DAVIS: How much?
 D. JONES: ... maybe like five (5) or something. I don't know. I'm, I'm ...
 DAVIS: [Unintelligible]
 [VOICES OVERLAP]
 D. JONES: ... trying to put it together, but, I didn't even know I ran out of it.
 DAVIS: Oh shit.
 D. JONES: So ...
 DAVIS: Alright, let me call, let me call dude and call you right back. I'm a little distant though, but I'm jumping on it right now.
 D. JONES: Okay. Around, if, if it was [sic] to happen, around, around about, uh, just so I could let my peoples know, that's asking me for it right now.
 DAVIS: Let me see now, let me see. I would say by six (6:00), six-thirty (6:30), between six-thirty, seven (6:30 - 7:00).
 D. JONES: Okay.
 DAVIS: Alright? I'm on it right now. Let me call dude right now and make sure secure it.
 D. JONES: Alright.
 DAVIS: Yeah.

48. Based on my training, experience, and knowledge of the investigation, I believe the above-excerpted call reflects JONES ordering drugs from DAVIS ("maybe like five or something") because JONES was out ("I didn't even know I ran out of it") and DAVIS agreeing to supply the drugs to JONES ("I'm on it right now. Let me call dude right now and make sure secure it.").

49. On May 4, 2026, at approximately 3:32 p.m., law enforcement agents intercepted an incoming call to Target Telephone 2 from JONES (session #232). The following is an excerpt of this incoming call to DAVIS from JONES:

DAVIS: Yo. [AUDIO BREAKS]
 D. JONES: Yo, bro. There wasn't nothing [sic] bro?
 DAVIS: That dude [Unintelligible]. I'm sitting waiting on it right now. Just five (5), right?
 D. JONES: Uh.
 DAVIS: Yeah, I'm, I swear. ..
 DAVIS: Huh?
 [VOICES OVERLAP]
 D. JONES: Five (5) is good. I can do ten (10) now, though.
 DAVIS: Yeah? You, you gonna ...
 [VOICES OVERLAP]
 D. JONES: Yeah .

DAVIS: ... take care of them right away or, or I gotta wait?
 [VOICES OVERLAP]
 D. JONES: Uh ...
 DAVIS: 'Cause I'm taking it from somebody.
 D. JONES: I think I can take care of it right away. I know I got. ..
 DAVIS: Alright.
 D. JONES: Yeah. [[ASIDE: How you doing? It's almost done.]
 [VOICES OVERLAP]
 DAVIS: Uh, uh, uh, alright let me ca--, I'm calling him right now.
 D. JONES: Okay. [BACKGROUND: UF: (Unintelligible)]
 DAVIS: I'm waiting on him. I'm waiting on him.
 D. JONES: Uh, no, I'm real close if not, 'bout like eleven (11).
 DAVIS: Yeah.
 D. JONES: [INHALES] But I think I should be all the way there.
 [VOICES OVERLAP]
 DAVIS: Alright, cool.
 D. JONES: By the time you get here. Alright.
 DAVIS: Yeah, I'm on it. I'm on it.
 D. JONES: Uh.

50. Based on my training, experience, and knowledge of the investigation, I believe the above-excerpted call reflects DAVIS seeking to confirm JONES's order for drugs ("Just five, right?"), and JONES seeking to increase the quantity of drugs to obtain from DAVIS ("Five is good. I can do ten now, though." and "I'm real close if not, 'bout like eleven.").

May 4, 2026 – May 5, 2026

51. On May 4, 2026, Co-Conspirator 4 mailed two boxes from California, one of which was destined to the Oak Lane House.

52. On May 5, 2026, at approximately 1:38 p.m., law enforcement agents intercepted an incoming call to Target Telephone 2 from JONES (session #246). The following is an excerpt of this incoming call to DAVIS from JONES:

DAVIS: Yo, bro G.
 JONES: What's going on, bro? My bad. I was all caught up in this store, man.
 DAVIS: I figured-
 JONES: I ain't even know that you called.
 DAVIS: Yeah, I did call because guess what now.
 JONES: What's- Can't get it?

[VOICES OVERLAP]

DAVIS: So- No, I never got through because one (1) of them, like, he's trying to raise up the price and all of that shit. Because the other one (1)-They know each other. One (1) of their people got knocked off yesterday, so they don't know what's going on. So, they said they shut down. They're just watching what's going on.

JONES: Okay.

[VOICES OVERLAP]

DAVIS: So, just be careful. But, me personally, I'm going to be good in a couple of days. And I'm going- I'm going to get like thirty (30) or forty (40), so I'm going try and see if I can to save at least twenty (20) for you. You understand me?

JONES: Alright.

DAVIS: Yeah. But my other people just came through girl. If you want that, that's around, but other than that I ain't got nothing else.

JONES: Alright. Yeah, I don't-I don't need the girl yet. I still got like seven hundred (700).

DAVIS: Alright, cool. Yeah, so I'll be goo-I'll be-I'll be good in a couple days, though.

JONES: Okay.

DAVIS: Alright, cool.

53. Based on my training, experience, and knowledge of the investigation, I believe the above-excerpted call reflects DAVIS telling JONES to "be careful" because of a recent drug seizure ("One (1) of their people got knocked off yesterday"). DAVIS explained to JONES that he had only cocaine ("girl") to provide to JONES ("my other people just came through girl") and did not presently have any other drugs to provide to JONES ("I ain't got nothing else"). JONES declined the offer of cocaine because he still had some ("I don't need the girl yet. I still got like seven hundred (700)"). DAVIS told JONES that he would have other drugs to provide to JONES shortly ("I'm going to be good in a couple of days. And I'm going- I'm going to get like thirty (30) or forty (40), so I'm going try and see if I can to save at least twenty (20) for you"), which I believe is a reference to DAVIS having control of 30 to 40 pounds of methamphetamine, of which he would try to provide 20 pounds to JONES.

E. May 9, 2026 Surveillance and Search Warrants

54. On May 9, 2026, law enforcement officers observed a U.S. postal worker deliver to the

Oak Lane House what I believe to be one of the boxes mailed from California on May 4, 2026.

55. Shortly thereafter, on May 9, 2026, agents executed several federal search warrants:

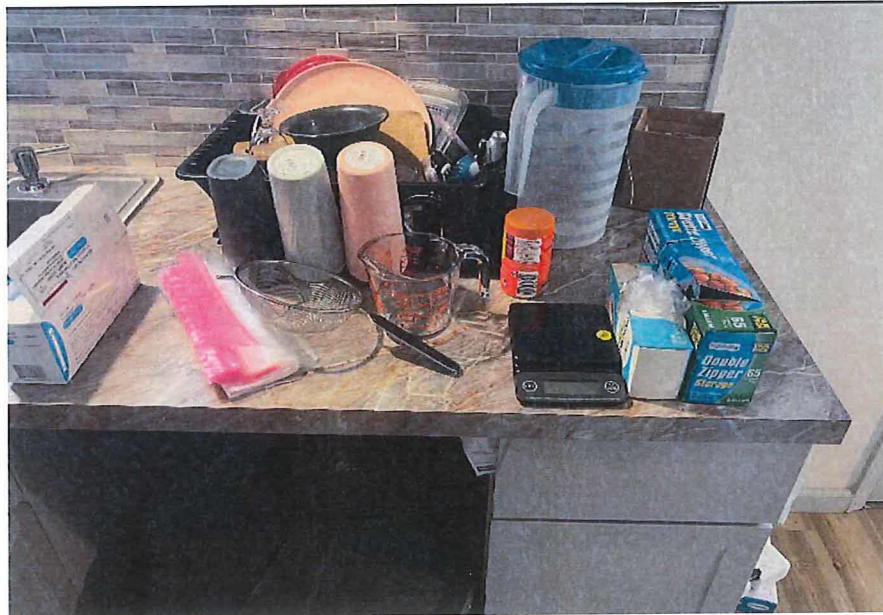
- a. Agents executing a search warrant at the Oak Lane House encountered BROWN and recovered, among other items, approximately 10 pounds of suspected methamphetamine and approximately 2 kilograms of suspected cocaine.
- b. Agents executing a search warrant at the McBride House encountered MCBRIDE and observed MCBRIDE unsuccessfully attempt to discard suspected controlled substances. Agents recovered during the search, among other items, more than 1 kilogram of suspected cocaine.

56. Based on my training, experience, and knowledge of the investigation, I believe the drugs recovered from the Oak Lane House during the search warrant included the methamphetamine that DAVIS had planned to provide to JONES for further distribution.

F. May 11, 2026 Search Warrants

57. On May 11, 2026, agents executed several federal search warrants:

- a. Agents executing a search warrant at the Jones Restaurant encountered JONES and recovered, among other items, approximately 2 pounds of suspected methamphetamine and approximately ½ kilogram of suspected cocaine.
- b. Agents executing a search warrant on STUBBS's person recovered several ounces of suspected cocaine and additional quantities of another suspected controlled substance.
- c. Agents executing a search warrant at the Stubbs House immediately after STUBBS exited the Stubbs House recovered, among other items, drug distribution paraphernalia, as shown in the following photograph:



III. CONCLUSION

58. Wherefore, I submit that there is probable cause to believe that the members of the conspiracy described above, from at least in or about August 2025 to in or about May 2026, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and possess with intent to distribute at least 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, at least 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (“fentanyl”), and at least 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, all Schedule II controlled substances, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.