

## **ATTACHMENT B**

### **AFFIDAVIT**

1. I, Christopher C. Kopp, am a Special Agent with the Federal Bureau of Investigation (“FBI”), and an “investigative or law enforcement officer” within the meaning of Title 18, United States Code, Section 2510(7). As such, your Affiant is empowered by law to investigate and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. Your Affiant has been a Special Agent with the FBI since August 2006. Prior to your Affiant’s employment with the FBI, your Affiant worked as a police officer for the Scottsdale Police Department in Scottsdale, Arizona for approximately six years. During that time, your Affiant received basic drug and gang training at the Arizona Law Enforcement Academy, and received advanced training while working as a Gang Liaison Officer and a Narcotics Trained Officer. As a Special Agent with the FBI, your Affiant was previously assigned to the Cleveland Division, and to the Northern Ohio Law Enforcement Task Force, a multi-agency federal, state and local law enforcement drug task force, for four years. Since June 2010, your Affiant has been assigned to the Newark Division, Atlantic City Resident Agency (“ACRA”), and to the South Jersey Safe Streets Violent Incident and Gang (“Safe Streets”) Task Force, a multi-agency federal, state and local violent gang task force. Your Affiant completed basic drug training at the FBI Academy, Advanced Narcotic Investigation Training and Conspiracy Investigation Training provided by the Drug Enforcement Administration (“DEA”), and Money Laundering and Asset Forfeiture training provided by the Department of Justice. During your Affiant’s assignments with the FBI, he has been assigned to investigations involving drug trafficking offenses in the Northern District of Ohio and the District of New Jersey.

3. Your Affiant has written and executed federal and state search warrants which have resulted in the seizure of illegal drugs and evidence of drug violations. Your Affiant has written and executed seizure warrants which have resulted in the seizure of assets acquired with drug proceeds. Your Affiant has previously been the affiant of wiretap applications which led to the arrest and conviction of subjects for drug possession, drug distribution and money laundering, as well as seizures of illegal drugs, weapons, and assets involved in drug trafficking. Your Affiant has supervised the activities of confidential human sources who have provided information and assistance in the federal prosecution of drug offenders. Based upon the above training and experience, your Affiant is familiar with the modus operandi of persons involved in the illicit distribution of controlled substances as well as terminology used by persons involved in the illicit distribution of controlled substances. Your Affiant is aware that persons involved in the illicit distribution of controlled substances routinely attempt to conceal their identities as well as the locations at which drug transactions occur. These people are also known to have cellular telephones, vehicles, properties, utilities and other items purchased or registered in the names of others, or in fictitious names, in order to conceal the association of drug activities with financial transactions.

4. During your Affiant's time in law enforcement, your Affiant has investigated numerous cases involving gangs and drugs, including, but not limited to, cases involving the use of confidential informants, undercover officers, and electronic surveillance. Many of these cases resulted in the execution of search warrants and arrest warrants. As a result, your Affiant has participated in numerous searches including, but not limited to, searches of residences and vehicles. Moreover, your Affiant has participated in numerous arrests.

5. Your Affiant has personally participated in this investigation and is aware of the facts contained herein based upon this investigation as well as on discussions with other law enforcement officers having knowledge of the case from their participation in the investigation. Your Affiant has not included all of the facts known to your Affiant in this Affidavit, just those facts which your Affiant believes are necessary to establish probable cause to support the request for the criminal complaints and arrest warrants identified herein. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

6. This Affidavit is submitted in connection with an application for arrests warrants for KHALIF TOOMBS, TYJUAN DEMAREST, WILBERT TOOMBS, TERRY N KELSEY, JAMAAL MARSHALL, WAYNE BURNSIDE, TIEYESHA TUCKER, NASIR BROWN, QUADIR STANLEY, KHALIF DAVIS, DAVID RAMIREZ, KARON CAREY, THOMAS RANDALL, JAMES BLACKWELL, DEAN JOHNSON, BLAINE DORSEY, PHILIP SURACE, JOSEPH AVERSA, VALARIE LAMAR, MAYDA HERNANDEZ, SARAH TALIAFERRO, and JEREMY CARLL, and criminal complaints charging such individuals with violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846.

## **I. SUMMARY**

7. Beginning in April 2017, FBI Newark, ACRA Safe Streets Task Force, along with the Atlantic City Police Department (“ACPD”), and other state and local law enforcement agencies received information from numerous independent Confidential Human Sources (“CHSs”) that **KHALIF TOOMBS** was operating a criminal enterprise engaged in the distribution of heroin in and around the Atlantic City, New Jersey area. The subsequent investigation, including reviews of local police reports, interviews of witnesses and CHSs,

extensive analysis of historical telephone call detail records, analysis of data received from a pen register and trap and trace device, physical surveillance, consensually recorded meetings and telephone calls, review and analysis of jail calls involving subjects of the investigation, controlled drug buys, and the execution of search warrants on residences, vehicles, and cellular telephones, confirmed that **TOOMBS** directs and coordinates with members and associates of his criminal enterprise in the distribution of heroin, as well as in the collection and laundering of proceeds from the sale of heroin, through communications over multiple and changing cellular telephones. **TOOMBS** uses traditional calls and text messaging, as well as social media platforms and applications, in an effort to thwart electronic surveillance by law enforcement. **TOOMBS** uses multiple, often changing, associates as couriers who deliver drugs packaged for resale to distributors and dealers. **TOOMBS** also stores his drugs, drug packaging materials, proceeds from the sale of drugs, and weapons, in the residences of associates. **TOOMBS** launders the proceeds from the sale of heroin through various bank accounts, as well as through lavish purchases of luxury clothing items, car rentals, and travel accommodations. **TOOMBS** has also been recorded discussing using the proceeds from the sale of heroin to purchase residential real estate.

## **II. MEMBERS OF THE CONSPIRACY**

8. **KHALIF TOOMBS**, a/k/a “Lif,” operates a sophisticated drug trafficking organization. **TOOMBS** distributes various quantities of heroin, packaged in bricks and bundles, to over twenty distributors and dealers, as well as directly to heroin users. **TOOMBS** acquires the heroin in Paterson, New Jersey and distributes it in the Atlantic City area. **TOOMBS** uses multiple stash houses and distribution locations, as well as multiple couriers and distributors.

**TOOMBS** launders the proceeds from the sale of heroin through various means, including real estate, as well as his lavish spending on rental vehicles, trips, clothing and entertainment.

a. Court authorized interception of communications over two cellular telephones used by **TOOMBS** revealed thousands of communications wherein he directed his drug trafficking organization's activities. **TOOMBS** was observed, photographed, and video recorded in numerous meetings, which were arranged in intercepted communications, supplying heroin from various stash houses and collecting proceeds from the sale of heroin.

9. **TYJUAN DEMAREST**, a/k/a "Luck," a/k/a "Luck Foreign," a/k/a "Luck Foreigndope," is a heroin supplier. **DEMAREST** supplies **KHALIF TOOMBS** with large quantities of heroin pre-packaged for resale from Paterson, New Jersey.

a. **DEMAREST** was observed, photographed and video recorded supplying **TOOMBS's** courier, **JAMAAL MARSHALL**, with large boxes containing heroin, while simultaneously receiving smaller boxes containing United States currency as payment for the heroin.

10. **WILBERT TOOMBS** is a heroin dealer who is supplied by his son, **KHALIF TOOMBS**. **WILBERT TOOMBS** sells heroin, and cocaine, on the street in Atlantic City to various customers, including other heroin dealers<sup>1</sup>.

a. **WILBERT TOOMBS** was intercepted in numerous communications ordering quantities of heroin from **KHALIF TOOMBS**, and was observed, photographed, and video recorded in meetings arranged in intercepted communications

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<sup>1</sup> References in this affidavit to "TOOMBS" refers to **KHALIF TOOMBS**. When referring to **WILBERT TOOMBS**, your Affiant has used his complete name.

purchasing heroin from distributors at the direction of **KHALIF TOOMBS. WILBERT TOOMBS** sold heroin to a CHS during the course of the investigation.

11. **TERRYN KELSEY**, a/k/a “Busta,” is a close associate of **KHALIF TOOMBS** who distributes heroin at the direction of **TOOMBS. KELSEY** took control of **TOOMBS’s** heroin distribution operation while **TOOMBS** was on an out of state trip. **KELSEY** also sells cocaine, including to **TOOMBS’s** heroin customers.

a. **KELSEY** was intercepted in numerous communications distributing heroin on behalf of **KHALIF TOOMBS. KELSEY** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, supplying **TOOMBS’s** customers with heroin and collecting proceeds from the sale of heroin.

12. **JAMAAL MARSHALL**, a/k/a “Freak Gzz,” a/k/a “Mal G,” is a close associate of **KHALIF TOOMBS** who distributes heroin at the direction of **TOOMBS. MARSHALL** also acts as a courier for **TOOMBS**, transporting United States currency from Atlantic City, New Jersey to Paterson, New Jersey to acquire large quantities of heroin from **TYJUAN DEMAREST. MARSHALL** also sells cocaine, including to **TOOMBS’s** heroin customers.

a. **MARSHALL** was intercepted in communications arranging with **KHALIF TOOMBS** a trip from Atlantic City, New Jersey to Paterson, New Jersey to obtain a supply of heroin from **TYJUAN DEMAREST. MARSHALL** was observed, photographed, and video recorded on multiple trips to Paterson obtaining large boxes containing heroin from **DEMAREST**, and transporting the boxes to **TOOMBS’s** stash houses in Atlantic City. **MARSHALL** was also observed and video recorded, in meetings arranged in intercepted communications, supplying **TOOMBS’s** customers with heroin and collecting proceeds from the sale of heroin.

13. **WAYNE BURNSIDE Jr.**, a/k/a “Jeffrey Burnside Jr.,” is a heroin distributor for **KHALIF TOOMBS**. **BURNSIDE** uses his vehicle and his residence to store and distribute heroin, and to collect and store proceeds from the sale of heroin at **TOOMBS**’s direction.

a. **BURNSIDE** was intercepted in communications arranging the distribution of heroin at the direction of **KHALIF TOOMBS**. **BURNSIDE** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, supplying **TOOMBS**’s customers with heroin and collecting proceeds from the sale of heroin.

14. **TIEYESHA TUCKER** is a heroin distributor for **KHALIF TOOMBS**. **TUCKER** uses her residence to store and distribute heroin, and to collect and store proceeds from the sale of heroin at **TOOMBS**’s direction.

a. **TUCKER** was intercepted in communications arranging the distribution of heroin at the direction of **KHALIF TOOMBS**. **TUCKER** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, supplying **TOOMBS**’s customers with heroin and collecting proceeds from the sale of heroin. **TUCKER** supplied the customers with heroin that was stored in her residence.

15. **NASIR BROWN** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies. **BROWN** distributes heroin to multiple customers out of his residence and his vehicles. **BROWN** often arranged the meetings around the requirement of his participation in Drug Court, an intensive supervision program resulting from a previous drug arrest.

a. **BROWN** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **BROWN** was observed, photographed and video recorded in meetings arranged in intercepted communications purchasing

heroin from distributors at the direction of **KHALIF TOOMBS**, and from **TOOMBS** directly.

16. **QUADIR STANLEY** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies. **STANLEY** distributes heroin to multiple customers out of his residence and his vehicle.

a. **STANLEY** was intercepted in communications arranging the purchase of heroin from **KHALIF TOOMBS**. **STANLEY** was observed in a meeting arranged in intercepted communications purchasing heroin from **TOOMBS**'s distributors at the direction of **TOOMBS**. At the direction of case agents, **STANLEY** was arrested for active New Jersey State warrants immediately after a meeting with **TIEYESHA TUCKER**, at the direction of **TOOMBS**, and was found to be in possession of a quantity of heroin.

17. **KHALIF DAVIS**, a/k/a "Khalif Davis-Harris," is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.

a. **DAVIS** was intercepted in communications arranging the purchase of heroin from **KHALIF TOOMBS**. **DAVIS** was observed and photographed in a meeting, arranged in intercepted communications, purchasing heroin from **TIEYESHA TUCKER** at the direction of **TOOMBS**. **DAVIS** was also intercepted discussing heroin distribution strategies with **TOOMBS**, including the identification of possible rival heroin dealers in the area.

18. **DAVID RAMIREZ** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.



a. **RAMIREZ** was identified as a heroin customer of **TOOMBS** in an intercepted communication between **TOOMBS** and **KHALIF DAVIS**. After **TOOMBS** directed **TIEYESHA TUCKER** to supply **RAMIREZ** with a quantity of heroin, **RAMIREZ** was video recorded in a motor vehicle stop that was conducted on **RAMIREZ** as he left the meeting. Surveillance has also observed **RAMIREZ** during meetings to buy narcotics. **RAMIREZ** sold heroin, consistent with the heroin being distributed by **TOOMBS** and his associates, to a CHS during the course of this investigation.

19. **KARON CAREY** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.

a. **CAREY** was intercepted in communications arranging the purchase of heroin from **KHALIF TOOMBS**. **CAREY** was observed by surveillance, photographed and video recorded, in a meeting arranged in intercepted communications, purchasing heroin from **TIEYESHA TUCKER** at the direction of **TOOMBS**. Intercepted communications also confirmed that **CAREY** distributes heroin which had been purchased from **TOOMBS**.

20. **THOMAS RANDALL** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.

a. **RANDALL** was intercepted in communications arranging the purchase of heroin from **KHALIF TOOMBS**. **RANDALL** was observed, in a meeting arranged in intercepted communications, purchasing heroin from **WAYNE BURNSIDE** at the direction of **TOOMBS**. **RANDALL** was identified in a directed motor vehicle stop after another meeting with **BURNSIDE**, which was arranged in intercepted communications.

21. **JAMES BLACKWELL**, a/k/a “Jimbo,” is a heroin dealer who **KHALIF TOOMBS** supplies. **BLACKWELL** has also acted as a “lookout” warning **TOOMBS** regarding the presence of law enforcement around **TOOMBS**’s heroin storage and distribution location.

a. **BLACKWELL** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**, and purchases of cocaine from **JAMAAL MARSHALL**. **BLACKWELL** was observed and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TIEYESHA TUCKER**, as well as from **TOOMBS** himself.

22. **DEAN JOHNSON**, is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.

a. **JOHNSON** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **JOHNSON** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TOOMBS**’s distributors at the direction of **TOOMBS**.

23. **BLAINE DORSEY**, a/k/a “Ab,” is a heroin dealer who **KHALIF TOOMBS** supplies.

a. **DORSEY** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **DORSEY** was observed, photographed, and video recorded in meetings, arranged in intercepted communications, purchasing heroin from **TIEYESHA TUCKER** at the direction of **TOOMBS**.

24. **PHILIP SURACE** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.

a. **SURACE** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **SURACE** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TOOMBS**'s distributors at the direction of **TOOMBS**, as well as directly from **TOOMBS**. **SURACE** was also observed and video recorded selling heroin to individuals who were later arrested and found in possession of heroin.

25. **JOSEPH AVERSA** is a heroin distributor/dealer who **KHALIF TOOMBS** and **PHILIP SURACE** supply.

a. **AVERSA** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TOOMBS**'s distributors at the direction of **TOOMBS**, as well as directly from **TOOMBS**. **AVERSA** was also observed, photographed and video recorded selling heroin to several individuals.

26. **VALARIE LAMAR** is a heroin distributor/dealer who **KHALIF TOOMBS** supplies.

a. **LAMAR** was intercepted in communications arranging the purchase of heroin from **KHALIF TOOMBS**. **LAMAR** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TOOMBS**'s distributor at the direction of **TOOMBS**, as well as directly from **TOOMBS**.

27. **MAYDA HERNANDEZ** is a heroin customer who **KHALIF TOOMBS** supplies. **HERNANDEZ** works in concert with **JEREMY CARLL** and others to obtain heroin from **TOOMBS**. **HERNANDEZ** and **CARLL** are known to distribute to one another. **HERNANDEZ** has furthered the activities of the conspiracy by acting as "lookout" warning

**TOOMBS** regarding the presence of law enforcement around **TOOMBS**'s heroin storage and distribution location when she has met with him to acquire drug.

a. **HERNANDEZ** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **HERNANDEZ** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TOOMBS**'s distributors at the direction of **TOOMBS**, as well as directly from **TOOMBS**.

28. **JEREMY CARLL** is a heroin customer who **KHALIF TOOMBS** supplies. **CARLL** works in concert with **MAYDA HERNANDEZ** and others to obtain heroin from **TOOMBS**. **CARLL** and **HERNANDEZ** are known to distribute to one another. **CARLL** has furthered the activities of the conspiracy by acting as "lookout" warning **TOOMBS** regarding the presence of law enforcement around **TOOMBS**'s heroin storage and distribution location when he has met with him to acquire drugs.

a. **CARLL** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **CARLL** was observed, photographed, and video recorded, in meetings arranged in intercepted communications, purchasing heroin from **TOOMBS**'s distributors at the direction of **TOOMBS**, as well as directly from **TOOMBS**.

29. **SARAH TALIAFERRO**, a/k/a "Macc Taliaferro," is a heroin customer who **KHALIF TOOMBS** supplies.

a. **TALIAFERRO** was intercepted in numerous communications arranging the purchase of heroin from **KHALIF TOOMBS**. **TALIAFERRO** was observed, photographed, and video recorded, in meetings arranged in intercepted

communications, purchasing heroin from **TOOMBS**'s distributors at the direction of **TOOMBS**, as well as directly from **TOOMBS**. **TALIAFERRO** has furthered the activities of the conspiracy by distributing purchased heroin to at least one other known individual.

### **III. PROBABLE CAUSE**

30. In April 2017, ACPD received information from a CHS that **KHALIF TOOMBS** was involved in drug trafficking. Through the use of the CHS, ACPD conducted a series of controlled drug buys of heroin from **TOOMBS**. During the controlled drug buys, surveillance units observed **TOOMBS** enter a residence in Atlantic City just prior to meeting with the CHS and supplying the heroin.

31. On April 4, 2017, **TOOMBS** was arrested by ACPD and New Jersey state search warrants were executed at the residence described above, as well as at **TOOMBS**'s primary residence in nearby Egg Harbor Township, New Jersey. Items seized pursuant to the search warrants included a loaded 9mm handgun, an electronic money counter, approximately \$7,331 in United States currency, a quantity of heroin packaged for resale stamped "Cartel" and "Kiss Me," along with drug packaging materials (including plastic bags, rubber bands, rice, rubber gloves and masks), and two vehicles used by **TOOMBS** to deliver the heroin during the investigation, registered to an identified female ("IF-2"). **TOOMBS** was booked and processed by ACPD and released. The related State of New Jersey charges resulting from his April 4, 2017 arrest remain pending at the time of this affidavit.

32. On April 24, 2017, the Pleasantville Police Department conducted a traffic stop of a vehicle driven by an identified male ("IM-1"). IM-1 was found to be in possession of a small quantity of heroin packaged for resale, stamped "Time Out," and approximately \$9,430 in United

States currency. As a result, IM-1 was arrested, released, and later pled guilty to a felony drug charge. IM-1 was sentenced in October 2017 to Drug Court, an intensive supervision program.

33. On February 21, 2018, while conducting surveillance on an unrelated matter, case agents observed **KHALIF TOOMBS** in Atlantic City. Agents observed a pattern – **TOOMBS** would enter and exit a residence, get into a blue Infinity bearing New York license plate HTU-5177,<sup>2</sup> and drive to meet multiple unidentified individuals for short periods of time. Agents observed as **TOOMBS** appeared to exchange items with these unidentified individuals, in what was believed to be drug transactions, before returning to the residence. Based on these observations, case agents conducted a traffic stop on a vehicle occupied by one of these individuals who had been observed meeting with **TOOMBS** in **TOOMBS's** vehicle. As a result of the traffic stop, the individual was found to be in possession of heroin packaged for resale, which contained the stamp “AK 47,” and the individual was arrested.

34. That same day, February 21, 2018, a traffic stop was conducted with the vehicle driven by **TOOMBS**, after **TOOMBS** was observed returning to and then leaving the same residence. **TOOMBS** was found to be in possession of approximately six bundles of heroin, which contained the same “AK 47” stamp and approximately \$1,080 in United States currency. **TOOMBS** was arrested and New Jersey state search warrants were obtained and executed upon the residence that **TOOMBS** had been observed entering and exiting prior to the observed drug transactions, and on a cellular telephone seized from **TOOMBS** at the time of his arrest, Toombs Phone 2.<sup>3</sup> Pursuant to the search warrants, officers seized approximately 66 bricks of heroin, all

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<sup>2</sup> New York license plate HTU-5177 is registered to a blue 2018 Q60 Infinity, to the Hertz corporation, rented to KHALIF TOOMBS, 154 Dunlin Avenue, Pleasantville, New Jersey 08232, telephone number 609-892-0572 (Toombs Phone 2).

<sup>3</sup> A Gold Apple iPhone 6S, with Serial Number C76QJU41FRY7, IMEI number 353309075207447, determined to have the telephone number 609-892-0572. This telephone was seized and remains in

stamped “AK 47.” These bricks of heroin were packaged together into large blocks of 25 bricks each, wrapped tightly in green cellophane. Each wrapped block had the letters “AK” written in black ink on the outside, corresponding to the stamp “AK 47” marked on the individual bags.

35. At the time of his arrest, **KHALIF TOOMBS** was approached by case agents regarding his potential cooperation with law enforcement. **TOOMBS** declined to cooperate and did not give a statement. **TOOMBS** was incarcerated at the Atlantic County Justice Facility (“ACJF”).

36. Case agents obtained copies of recorded jail calls made by **KHALIF TOOMBS** while he was incarcerated at the ACJF. A review of those recordings revealed outgoing calls made to various identified individuals discussing ongoing criminal activity, including **TOOMBS** directing the collection of proceeds from the sale of heroin that **TOOMBS** had distributed to several individuals<sup>4</sup>. **TOOMBS** also discussed his money laundering efforts regarding using proceeds from the sale of heroin to purchase residential properties.

37. On February 23, 2018, at approximately 12:58 a.m., **KHALIF TOOMBS** made a call from the ACJF to a telephone number ending in 9517<sup>5</sup>, wherein he had a conversation with an identified female (“IF-1”). During the conversation IF-1 informed **TOOMBS** that **TOOMBS**’s lawyer had requested \$10,000 in payment. **TOOMBS** said, “She (lawyer) wants ten more bands (\$10,000)? Alright, look, when you get my keys there’s thirty thousand in my Gucci shoe box in my um, in my room.” IF-1 explained that she had already instructed IF-2 where to

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evidence storage, however the telephone number 609-892-0572, was re-assigned to another physical handset.

<sup>4</sup> All outgoing jail calls include a recorded preamble, informing both the caller and the receiver, that the conversations are recorded.

<sup>5</sup> The telephone number ending in 9517 is subscribed to IF-1, to an address in Egg Harbor Township, New Jersey.

find cash hidden at **TOOMBS's** residence, and that IF-2 had already removed approximately \$25,000. **TOOMBS** said, "Nah, 'cause it should've been twenty (\$20,000) in that shoebox. It should have been eight (\$8,000) in that gray trench coat pocket..." IF-1 said, "No, no, no, she (IF-2) got something else, a green, a green coat." **TOOMBS** said, "That's only four bands (\$4,000) and something else." IF-1 said, "Alright, okay, so the gray (coat)." **TOOMBS** went on to say, "Write this down, tell (an identified male) ("IM-2")...Clay owe' me thirty-one-twenty-five (\$3,125)<sup>6</sup>, he was supposed to be ready (to provide the proceeds from previously supplied heroin) the day I got locked up, its two days later, he should have my bread (money)...Yeah Clay, Heemie, Heemie owe' me thirty-one-twenty-five (\$3,125), and tell him Po, Po from the hood, tell him Po from, Shawn Po owe' me eighteen-hundred (\$1,800)...my uncle owes me seven-fifty (\$750)..."<sup>7</sup> Your Affiant believes, based on this conversation in conjunction with other subsequent conversations with other co-conspirators, that **TOOMBS** directed IF-1 to instruct IM-2 to collect proceeds from the sale of previously supplied heroin from several individuals.

38. On February 23, 2018, at approximately 1:13 p.m., **KHALIF TOOMBS** made a call from the ACJF to a telephone number ending in 8200<sup>8</sup>, wherein he had a conversation with

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<sup>6</sup> The amount of \$3,125 was mentioned numerous times in recorded jail calls as an amount that was owed to **KHALIF TOOMBS** by several individuals. Your Affiant believes that \$3,125 represents 25 bricks of heroin (such as the blocks of 25 bricks seized on February 21, 2019 from the residence associated with **TOOMBS**) at \$125 per brick, which is a common 'wholesale' price for bricks of heroin in the Atlantic City area, and is consistent with CHS reporting.

<sup>7</sup> All words and phrases contained in parentheses are provided by your Affiant as explanation only based on my training an experience and from reviewing the context of the communications in their entirety. They are inserted to assist the court, and are not the words of the individuals whose communications were intercepted.

<sup>8</sup> The telephone number ending in 8200 is subscribed to Clipper Kingz, at an address in Pleasantville, New Jersey.



IM-1. During the conversation **TOOMBS** said, “Are you listening...tell (IM-2) Clay owe’ me thirty-one-twenty-five (\$3,125), that nigga should have my bread (money).” IM-1 said, “I hit him myself, I hit him myself.” **TOOMBS** said, “...let IM-2 hit Clay, ‘cause Clay play games, I don’t want Clay tryin’ a act like he ain’t got it (money), he was supposed to be ready (to provide the proceeds) two days ago, so I know he ready when I got bagged (arrested)...they (law enforcement) found seventy-six bricks (of heroin) bro...they raided (an identified female’s, “IF-3”) crib...” IM-1 said, “How did they do that?” **TOOMBS** said, “Man they said they follow’ me, and bust the trap (arrested **TOOMB**’s drug customer) and then I went back there, so when I left there they booked me, I had a brick (of heroin) on me so they went back on her crib.” Your Affiant believes **TOOMBS** directed IM-1 to collect proceeds from the sale of previously supplied heroin from several individuals. Further, **TOOMBS** explained to IM-1 that he had been observed by police making a heroin sale, and the police arrested (“bust”) his heroin customer (“the trap”), then followed to **TOOMBS** to IF-3’s residence where the heroin was stored (“they found seventy-six bricks...they raided IF-3’s crib”).

39. On February 24, 2018, at approximately 6:37 p.m., **KHALIF TOOMBS** made a call from the ACJF to a telephone number ending in 5877<sup>9</sup>, wherein he had a conversation with an identified female, (“IF-4”). During the conversation they discussed **TOOMBS** laundering the proceeds from the sale of drugs through the purchasing of real estate. **TOOMBS** said, “...I was just about to buy another crib (residence) on the first, I don’t know how that’s going to go. I’m still trying to do it. ‘Cause that’s going to be another crib that I can rent out...I’m going to try and buy like four, five more of them, and I’m going to just chill. Stack bread (collect money) off of that...I’m pretty sure I’m going to have to do a bid (serve a term of incarceration), especially

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<sup>9</sup> The telephone number ending in 5877 is subscribed to an individual at an address in Atlantic City, New Jersey.

now, like I could have probably beat that other shit (charges related to April 2017 arrest), now I'm really probably going to have to lay down. So I want to come home, get shit in order to where its though I got like four, five, six cribs (residences) I'm renting out and that way, when I'm laying down (incarcerated), I just got money stacking up...which I should have been did. I had enough bread to stop (drug trafficking). I just, was just, that shit (money) was coming so fast and easy." IF-4 said, "Yeah, you know how that shit be like." **TOOMBS** said, "So easy like, shit be like thirty bands every, thirty bands (\$30,000) profit like every two-and-a-half weeks. That shit be too easy. It's too fucking easy." Your Affiant believes **TOOMBS** told IF-4 that he wanted to purchase residential properties with proceeds from the sale of drugs. Further, he expressed his belief that he should have already purchased additional properties, but that his drug trafficking activity was making him too much money ("thirty bands profit...that shit be too easy").

40. On March 1, 2018, **KHALIF TOOMBS** was released from the ACJF, and his charges relating to the arrest of February 21, 2018 are still pending at the time of this affidavit.

41. On July 5, 2018, while assisting ACPD with surveillance related to a drug investigation, case agents conducted a traffic stop on a vehicle driven by IM-1. IM-1 attempted to flee from the vehicle, and was arrested after a brief foot pursuit. IM-1 was found to be in possession of approximately 11 bricks of heroin. The heroin was stamped "Apple." IM-1, still released as a Drug Court participant stemming from his April 2017 arrest, was arrested, processed and then incarcerated at the ACJF. IM-1 remains incarcerated as of the date of this affidavit.

42. Case agents obtained copies of recorded jail calls made by IM-1 while he was incarcerated at the ACJF. A review of those recordings revealed numerous outgoing calls made

to **KHALIF TOOMBS**, on Toombs Phone 2, discussing their drug trafficking activity, including **TOOMBS** providing money to pay for IM-1's lawyer, names of heroin distributors who owed **TOOMBS** money, discussions regarding the identities of law enforcement officers and descriptions of the law enforcement vehicles involved in IM-1's arrest, and law enforcement methods at obtaining cooperation as well as discussing specific individuals who are believed to be cooperating with law enforcement in drug investigations.

43. On July 8, 2018, at approximately 5:24 p.m., IM-1 made a call from the ACJF to Toombs Phone 2, wherein he had a conversation with **KHALIF TOOMBS**. During the conversation they discussed the circumstances of IM-1's arrest, including the names of the police officers, descriptions of their vehicles, and their method of attempting to secure IM-1's cooperation regarding his source of supply of heroin. IM-1 said, "They (police) came at me the same way they came with bro..." **TOOMBS** said, "Yeah, like I told you they was." **TOOMBS** inquired if the police officers named or asked about **TOOMBS**. IM-1 said, "...I'm stressin', but there's certain things I'm never doin'." **TOOMBS** said, "Yeah, remember I told you them (police) tried to spin that shit (cooperation) with me..." Later **TOOMBS** said, "Which, oh they said it was the nigga Andrew, who the other cop was?" IM-1 and **TOOMBS** discussed the names and descriptions of four other police officers involved in IM-1's arrest. **TOOMBS** then said, "What was they in?" IM-1 said, "It was a black Blazer, Impala, mind you I didn't see none of that shit, they was on that nigga with binoculars, so they came from a distance..." Your Affiant believes that IM-1 and **TOOMBS** discussed the unmarked vehicles driven by the police who arrested IM-1 in order to become familiar with them and to observe them in counter-surveillance during criminal activity.

44. On October 16, 2018, at approximately 7:57 p.m., IM-1 made a call from the ACJF to Toombs Phone 2, wherein he had a conversation with **KHALIF TOOMBS**. During the conversation IM-1 said, “So look, so look, just do this bro, just do this, just do this for me, and I’ll appreciate, that’s all I need, just give me...with the three (\$3,000) look, listen, but listen, when Cuz give you that (proceeds from the sale of heroin), take fifteen (\$1,500) from that, and then what’s his name will take fifteen from that, and that’ll be three out the way for you, and then, everything from then, I’m good.” **TOOMBS** said, “What? Fifteen from what?” IM-1 said, “You gonna loan me the three? I’m a give it back to you.” **TOOMBS** and IM-1 then discussed IM-1 paying **TOOMBS** back in “installments.” IM-1 said, “That’ll catch me up like that...I’ll be good with [my attorney] for everything...I could just give [my attorney] like twelve (\$1,200) every time, just to get her out the way...then I could get home.” **TOOMBS** said, “Yeah.” Your Affiant believes that IM-1 asked **TOOMBS** to loan IM-1 money to pay IM-1’s attorney in order to get IM-1 released from custody. Based on this, and other recorded conversations between IM-1 and **TOOMBS**, your Affiant believes that IM-1 is aware of **TOOMBS**’s difficulties collecting proceeds from the sale of heroin from several distributors. Further, IM-1 informed **TOOMBS** that IM-1 will be able to pay **TOOMBS** back when IM-1 is “home” and can return to distributing heroin for **TOOMBS**.

45. From January 22, 2019 to April 11, 2019, case agents, using a CHS, conducted a series of controlled drug buys of heroin from **WILBERT TOOMBS**<sup>10</sup>. Those controlled drug buys, in conjunction with consensual recordings, physical surveillance, and extensive analysis of

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<sup>10</sup> In this investigation, heroin purchased or seized pursuant to arrests or the execution of search warrants has been packaged for resale in wax folds, or envelopes, often referred to as “bags.” Each bag contains an individual dosage unit. The bags often contain a stamp, with printed words or images that are used to identify or label the supply of heroin. The bags are usually packaged into rubber banded “bundles” of 10 bags. Five bundles wrapped together and taped in paper constitutes a “brick” of heroin.

call detail records, revealed that **TIEYESHA TUCKER** was supplying the heroin to **WILBERT TOOMBS** out of her residences at 1449 Adams Court and 1450 Adams Court, Atlantic City, New Jersey, and that **WILBERT TOOMBS** was calling a telephone number used by **KHALIF TOOMBS** in order to arrange for the heroin transactions.

46. On April 12, 2019 court authorized interception of communications was initiated over two cellular telephone numbers, 202-322-1467 (“**TOOMBS** Phone 1”) and 609-892-0572 (“**TOOMBS** Phone 2”), both used by **KHALIF TOOMBS**. That interception was extended on May 9, 2019 and again on June 7, 2019 and is set to expire on July 7, 2019. Interception of both wire and electronic communications confirmed that **TOOMBS** runs a sophisticated criminal enterprise. **TOOMBS** distributes various quantities of heroin to over twenty individuals. **TOOMBS** communicates directly with these distributors, dealers, couriers/runners, as well as suspected heroin users, through traditional voice calls as well as text messaging. However, **TOOMBS** and his associates use other means of communications, including the FaceTime and Snapchat applications and other social media platforms, to discuss specific details and arrangements regarding drug trafficking activity. Throughout the period of interception, on a daily basis, **TOOMBS** and his associates have discussed and planned their drug trafficking activities around residences used as “stash houses” where heroin is stored and distributed from, and where proceeds from the sale of heroin are collected and stored.

47. On April 12, 2019, at approximately 8:38 p.m., an incoming call was received over Toombs Phone 2 from a telephone number ending in 9682<sup>11</sup> wherein **KHALIF TOOMBS** had a conversation with an Unknown Male. The Unknown Male provided **TOOMBS** with a telephone number and informed **TOOMBS** that the user of that telephone number was

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<sup>11</sup> No subscriber information available from service provider.

distributing large quantities of heroin. The Unknown Male described how **TOOMBS** should recruit that individual to distribute **TOOMBS**'s heroin. **TOOMBS** said, "...Alright I'm about to give that (telephone number) to Busta (**TERRYN KELSEY**) in like five minutes." The investigation has learned through intercepted communications as well as physical surveillance that **TOOMBS** uses **KELSEY** to distribute heroin to **TOOMBS**'s customers. **TOOMBS**, **KELSEY**, and others, refer to **KELSEY** as "Busta" in numerous intercepted communications. On several occasions, **KELSEY** supplied heroin to customers and was not seen going to residences that **TOOMBS** has used to store heroin in prior to, or after the meetings. Your Affiant believes that, at times, **KELSEY** maintains a supply of heroin, as well as collected proceeds from the sale of heroin, in his vehicle and in his residence at 17 Brooklyn Avenue, Atlantic City, New Jersey.

48. On April 12, 2019, in coordination with the Atlantic County Prosecutor's Office ("ACPO"), a CHS conducted a controlled drug buy of heroin using a CHS from **DAVID RAMIREZ**. **RAMIREZ** sold the CHS a quantity of heroin in exchange for United States currency. The heroin supplied by **RAMIREZ** was stamped "Apple," similar to heroin purchased from **WILBERT TOOMBS**. The CHS was equipped with audio recording equipment which captured the interaction between the CHS and **RAMIREZ** during the narcotics transaction. Further, law enforcement officers overheard the call made by the CHS to set up the narcotics transaction and then observed the narcotics transaction between the CHS and **RAMIREZ**.

49. On April 13, 2019, at approximately 4:21 p.m., an incoming text message was received over Toombs Phone 1 from a telephone number ending in 8029<sup>12</sup>, used by **VALARIE LAMAR** that read [Need to c u. 5]. At approximately 4:22 p.m., an outgoing call was made from

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<sup>12</sup> The telephone number ending in 8029 is subscribed to Valarie Lamar, at an address in Atlantic City, New Jersey.

Toombs Phone 1 to the telephone number ending in 8029 wherein **KHALIF TOOMBS** had a conversation with **LAMAR**. During the conversation **TOOMBS** said, “Can you get to um, Adams Court...pull up right on New York Ave by the church...what kind of car you be in?” **LAMAR** said, “...I’m in a green car, a green truck.” At approximately 4:24 p.m., an outgoing text message was sent from **TOOMBS** Phone 1 to the telephone number ending in 8029 that read [Make sure the money straight]. Your Affiant believes after **LAMAR** ordered five bricks of heroin (“5”), **TOOMBS** directed her to **TIEYESHA TUCKER**’s residence at 1450 Adams Court (“Adams Court...New York Ave”). **TOOMBS** also sent a text message confirming that **LAMAR** was to give the payment to **TUCKER** (“Make sure the money straight”).

50. On April 13, 2019, at approximately 7:43 p.m., an incoming call was received over Toombs Phone 1 from a telephone number ending in 6419<sup>13</sup> wherein **KHALIF TOOMBS** had a conversation with **JEREMY CARLL**. During the conversation **CARLL** said, “Can I get two little ones (bundles of heroin)?” **TOOMBS** said, “Yeah.” **CARLL** said, “Okay, I’m here now.” In numerous intercepted communications **CARLL** called or sent text messages to **TOOMBS** ordering quantities of heroin (“two little ones”). **TOOMBS** would then direct **CARLL** to meeting locations near residences used by **TOOMBS** to store and distribute heroin, and **CARLL** would meet with **TOOMBS** or **TOOMBS**’s heroin distributors. **CARLL** would often order and receive quantities of heroin twice in one day. At approximately 7:53 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419 that read [A lot of pigs out tonight... I let her know I saw on Facebook they're going to start parking cars and walk streets sim]. Your Affiant believes **CARLL** was warning **TOOMBS** of the increased presence of uniformed police officers (“A lot of pigs out tonight”) in the area

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<sup>13</sup> The telephone number ending in 6419 is subscribed to Jeremy Carll, at an address in Atlantic City, New Jersey 08401.

where **TOOMBS** was conducting his drug trafficking activity, as well as notifying **TOOMBS** that he (**CARLL**) warned **TIEYESHA TUCKER** (“I let her know”).

51. On April 14, 2019, at approximately 12:17 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2856<sup>14</sup> wherein **KHALIF TOOMBS** had a conversation with **JAMES BLACKWELL**. During the conversation **BLACKWELL** said, “Yo, I had to take one to my boy near Shoprite, my little bro (bundle of heroin).” **TOOMBS** said, “Nah, nah, nah, need his bread (money).” **BLACKWELL** said, “And come back? Go there and come back...But you gonna make me dip (drive) for little bro, or you gonna make me go way to Absecon and back?” **TOOMBS** said, “Bro she (**TIEYESHA TUCKER**) doesn't want to come outside...She's not. I' running her already crazy, she's seven months pregnant. She' not going outside for no small one (small quantity of heroin) bro.” **BLACKWELL** said, “... I'll go to her door.” **TOOMBS** said, “No bro you can't go to the door.” **BLACKWELL** was requesting to be supplied heroin before providing payment, but **TOOMBS** required payment first (“nah, need his bread”). Further, after **BLACKWELL** advised he would walk directly to **TUCKER**'s door to get the heroin, **TOOMBS** admonished **BLACKWELL** that he can't go directly to her door (“you can't go to the door”). In numerous intercepted communications, **TOOMBS** has directed individuals to areas around the Adams Court apartments to conduct drug transactions. Your Affiant believes that these areas are chosen in an effort to avoid observation by law enforcement, as well as apartment complex security cameras. At approximately 12:59 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2856 wherein **TOOMBS** had another conversation with **BLACKWELL**. During the conversation **BLACKWELL** said, “...the police just walked up in

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<sup>14</sup> The telephone number ending in 2856 is subscribed to James Blackwell, at an address in Philadelphia, Pennsylvania.



the gate. They went inside of Adams.” **TOOMBS** said, “Who?” **BLACKWELL** said, “A uniform, a uniformed cop. He walked, he's going to somebody's door. I think right across from hers (**TUCKER**'s).” **TOOMBS** said, “Alright.” On several occasions, individuals including **BLACKWELL**, **MAYDA HERNANDEZ**, **JEREMY CARLL**, and others, have warned **TOOMBS** of the location of law enforcement. Your Affiant believes that **BLACKWELL** was warning **TOOMBS** (“the police...went inside of Adams...right across from hers”) so that **TOOMBS** and **TUCKER** would not conduct their drug trafficking activity at that time.

52. On April 15, 2019, at approximately 5:26 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 3163<sup>15</sup>, used by **SARAH TALIAFERRO**, that read [Can i come get 2 please?]. At approximately 6:00 p.m., an outgoing text message was sent from **TOOMBS** Phone 1 to the telephone number ending in 3163 that read [My bro coming to give it to you]. Case Agents learned during the investigation that **TOOMBS** often directs **TERRYN KELSEY**, a/k/a “Busta,” to conduct drug transactions on **TOOMBS**'s behalf, referring to **KELSEY** as his “bro.” On this day, intercepted communications revealed that **KELSEY** was delivering heroin to multiple customers at the direction of **TOOMBS**.

53. On that same day, at approximately 5:31 p.m., an incoming call was received over **TOOMBS** Phone 1 from the telephone number ending in 9066<sup>16</sup> wherein **KHALIF TOOMBS** had a conversation with **DEAN JOHNSON**. During the conversation **JOHNSON** said, “Just need to get with you (to obtain heroin).” **TOOMBS** said, “Same (quantity)?” **JOHNSON** said, “Yeah...I'm at the same place we use' the other day.” Based on numerous surveilled and video

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<sup>15</sup> The telephone number ending in 3163 is subscribed to “Macc Taliaferro”, with username Taliaferro.s69 and an email address, Taliaferro.s69 registered with a service provider.

<sup>16</sup> No subscriber information available from service provider.

recorded meetings, your Affiant knows that **JOHNSON** was referring to the Slingin Wings restaurant at 928 Arctic Avenue, Atlantic City, New Jersey. At approximately 5:41 p.m., an outgoing call was made from Toombs Phone 1 to a telephone number ending in 9066, wherein **TOOMBS** had another conversation with **JOHNSON**. During the conversation **TOOMBS** said, “You can go there...my man (**KELSEY**) outside in a gray car...it’s Busta, it’s Busta.” **KELSEY** then met with **JOHNSON** and supplied him with heroin, as directed by **TOOMBS**. Further, **KELSEY** was not seen meeting with **TOOMBS**, or at any residences used by **TOOMBS** to store heroin or proceeds from the sale of heroin, before or after any of the above mentioned transactions. Your Affiant believes that, at times, **KELSEY** maintains a supply of heroin as well as proceeds from the sale of heroin at his residence at 17 Brooklyn Avenue.

54. On April 16, 2019, at approximately 10:08 a.m., an outgoing call was made from Toombs Phone 1 to a telephone number ending in 4829<sup>17</sup> wherein **KHALIF TOOMBS** had a conversation with **BLAINE DORSEY**. During the conversation, **DORSEY** said, “I need a whole tizzy (one brick of heroin).” **TOOMBS** said, “Alright look, come on the New York Ave side though, and don't be like right by the entrance (to Adams Court apartments), just be.” **DORSEY** said, “In the middle yeah, that's what I try to do, yeah.” After **DORSEY** ordered a brick of heroin (“a whole tizzy”), **TOOMBS** directed **DORSEY** to the gate to the Adams Court apartments, where **TIEYESHA TUCKER** lives and distributes heroin. Further, **TOOMBS** and **DORSEY** discussed conducting the transaction between the gated entrance and the courtyard (“don’t be like right by the entrance,” “in the middle”). Your Affiant believes that **TOOMBS** did not want **DORSEY** and **TUCKER** to conduct the heroin transaction on the street, where they

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<sup>17</sup> The telephone number ending in 4829 has no subscriber information available.

can easily be viewed by law enforcement, nor in the courtyard where complex security cameras are located.

55. On April 16, 2019, at approximately 3:34 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 1292<sup>18</sup>, used by **KHALIF DAVIS**, that read [Still (Apple) or fortnight]. At approximately 3:34 p.m., an outgoing text message was sent from Toombs Phone 1 to a telephone number ending in 1292 that read [Apple and frank Lucas]. At approximately 3:35 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 1292 that read [Imma let you know when I'm on my way I'm trying to see how many I need]. At approximately 3:35 p.m., an outgoing call was made from Toombs Phone 1 to a telephone number ending in 1292 wherein **KHALIF TOOMBS** had a conversation with **DAVIS**. During the conversation **TOOMBS** and **DAVIS** discussed the quality of different heroin stamps supplied by **TOOMBS**, as well as individuals who were, or who wanted to be, distributing **TOOMBS**'s heroin. **DAVIS** said, "...Remember I kept comin' to grab ten, ten, ten (bricks of heroin at a time)...he (unknown male) was fucking with somebody else who had that...the Apple (heroin stamp), they was bringing ten (bricks) to him and shit." **TOOMBS** said, "What, with that name (heroin stamp) that I had?" **DAVIS** said, "...it looked exact same. That's why I'm like, like the name...I'm saying he got the Apple and the Fortnight (heroin stamps), like, but he ain't got it no more. He went out of it. But, I'm like 'yo who you been grabbin' from (who supplied you)?' And, he ain't really want to say so I'm like 'oh alright bet,' cuz (**TOOMBS**) is sending his shit (supplying the unknown male with heroin) you feel me? 'Cause I'm like I know you (**TOOMBS**) the only one that had that (heroin stamped Apple and Fortnight) shit." **TOOMBS** said, "Yeah." **DAVIS** said, "...So, I'm like alright, I'm

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<sup>18</sup> The telephone number ending in 1292 is subscribed to Khalif F. Davis at an address in Mays Landing, New Jersey.

tryin' to get my other nigga to grab this Frank Lucas (heroin stamp), so that way we could put it out here...Dave (**DAVID RAMIREZ**) already told me that's what it (heroin stamp that **TOOMBS** is supplying) was..." **TOOMBS** said, "This is what I'm goin' do, I'm goin' uh, I'm a get that Fortnite back." **DAVIS** said, "... they (heroin customers) said that shit was rocking (good quality heroin)." **TOOMBS** said, "Alright, I'm just goin' to just give you both. You want both (heroin stamps) or just all Frank?" Davis said, "Yeah, I'm a, I'm a probably get the uh, uh, probably like three of the Frank and get the other nigga the Apple shit." Your Affiant believes that **DAVIS** was telling **TOOMBS** that he had discovered that an individual (not named in the call) was distributing heroin stamped "Apple" and "Fortnight," which are known by **DAVIS** to be supplied by **TOOMBS**. Further, **DAVIS** mentioned that **DAVID RAMIREZ**, who was identified through intercepted communications and physical surveillance as a heroin distributor supplied by **TOOMBS**, was also selling **TOOMBS**'s stamp. The identity of the individual whom **DAVIS** was reporting on is not known, however, your Affiant believes that **DAVIS** was informing **TOOMBS** out of concern as the individual could be a competitor to **TOOMBS**, or that **TOOMBS** was supplying a competitor to **DAVIS**.

56. On April 16, 2019, at approximately 10:55 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647<sup>19</sup> wherein **KHALIF TOOMBS** had a conversation with **TIEYESHA TUCKER**. During the conversation **TOOMBS** said, "Old boy there for the five (bricks of heroin)." **TUCKER** said, "Alright..." **TOOMBS** said, "Alright, alright he, he in a white Honda on New York." **TOOMBS** was directing **TUCKER** to supply heroin to an individual ("old boy") who was parked in a white Honda on New York Avenue outside the Adams Court apartments. However, there were no prior intercepted communications

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<sup>19</sup> The telephone number ending in 0647 is subscribed to Tiesha Tucker at an address in Atlantic City, New Jersey.

regarding the individual **TOOMBS** was referring to. Surveillance units observed as **TUCKER** walked from her residence at 1450 Adams Court to a white Honda parked on New York Avenue, and then back to her residence. At the direction of case agents, uniformed Atlantic City police officers in a fully marked patrol vehicle conducted a traffic stop of the white Honda after it left the area of the Adams Court apartments. The purpose of the stop was to identify the occupants of the vehicle, who were believed to have been supplied heroin by **TUCKER**. The passenger of the vehicle was identified as **DAVID RAMIREZ** through his New Jersey driver license. **RAMIREZ** and the driver were released from the stop.

57. On April 17, 2019, at approximately 9:55 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 8029, used by **VALARIE LAMAR**, that read [Need to c u. 5]. At approximately 10:33 a.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8029 wherein **KHALIF TOOMBS** had a conversation with **LAMAR**. During the conversation **TOOMBS** said, “Come down to the back.” **LAMAR** said, “Alright.” At approximately 10:34 a.m., **KHALIF TOOMBS**’s previously identified gray Dodge Durango arrived at the High Gate Apartments at 655 Absecon Boulevard, Atlantic City, New Jersey. **LAMAR** then exited the back door of the High Gate apartments, walked to, and entered the front passenger door of **TOOMBS**’s vehicle. Approximately one minute later, **LAMAR** exited the vehicle and re-entered the apartment building. Your Affiant believes that after **LAMAR** ordered five bricks of heroin (“5”), **TOOMBS** met with **LAMAR** outside her residence at the High Gate apartments and supplied her with the heroin.

58. On April 18, 2019, at approximately 12:37 p.m., an incoming call was received over Toombs Phone 2 from the ACJF wherein **KHALIF TOOMBS** had a conversation with an

Unknown Male, a/k/a “Qua,” who was an inmate at the facility. During the conversation the Unknown Male said, “What’s up with Bus (**TERRYN KELSEY**)?” **TOOMBS** said, “That nigga good, you know, running (delivering drugs).” Your Affiant believes, based on intercepted communications and surveillance, that **TOOMBS** was telling the Unknown Male that **KELSEY** was out delivering **TOOMBS**’s heroin. Your Affiant knows, based on training and experience, that the term “running” is often used to refer to the delivery of illegal drugs.

59. On April 18, 2019, at approximately 1:32 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 5212<sup>20</sup> wherein **KHALIF TOOMBS** had a conversation with **MAYDA HERNANDEZ**. During the conversation **HERNANDEZ** said, “Hey sweetie can I come see you for one (brick of heroin)?” **TOOMBS** said, “One whole?” **HERNANDEZ** said, “Yeah...alright, can I go now (to Adams Court apartments).” **TOOMBS** said, “Yeah.” At approximately 1:44 p.m., **HERNANDEZ** arrived on New York Avenue outside the gate entrance to the Adams Court apartments as the front seat passenger of a blue BMW. At approximately 1:45 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 5212 that read [Here]. At approximately 1:48 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 5212 wherein **TOOMBS** had another conversation with **HERNANDEZ**. During the conversation **HERNANDEZ** said, “Yo, um who's this car? That uh, I have a Ford, in the front, um, with New Jersey plates, but he’ got a radio...he's about to leave.” **TOOMBS** said, “You said somebody parked over there with a radio?” **HERNANDEZ** then provided **TOOMBS** with a description of the vehicle and the driver. **HERNANDEZ** said, “I'm in the blue one, you know um, the uh BMW. He just turned there...yeah, he turned all the way

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<sup>20</sup> The telephone number ending in 5212 is subscribed to Jeremy Carll at an address in Atlantic City, New Jersey.

over there. He, he tryin' to come up, he's goin' turn down like, he ain't got no way out but to go to Tennessee (avenue). He ain't got..." **TOOMBS** said, "He goin' towards Tennessee?" **HERNANDEZ** said, "Yeah, Tennessee. You goin' see that car right there. That's the only car that's goin' to come down, watch." **TOOMBS** said, "I'm about to cut him off. I want to see him." **HERNANDEZ** said, "Yup. He was just sittin' there. We seen the radio..." **TOOMBS** said, "Yeah, I don't see it. They not on this side." **HERNANDEZ** said, "Yup. He was in a Ford, um gold...I won't forget that one. Yup, on the four door. Yup." **TOOMBS** said, "Alright, I'm about to have her (**TIEYESHA TUCKER**) come out there." Your Affiant believes that as **HERNANDEZ** arrived at the Adams Court apartments to be supplied heroin by **TUCKER**, **HERNANDEZ** observed a member of the surveillance team in a Ford. **HERNANDEZ** accurately described the vehicle ("Ford," "Gold," "Four Door,") to **TOOMBS** and the fact that she saw the driver speaking on a radio. Your Affiant believes that **HERNANDEZ** was warning **TOOMBS** of the location and description of the vehicle and driver, in order to protect their criminal activity from law enforcement. After receiving the description, **TOOMBS** informed **HERNANDEZ** that he was going to try to use his vehicle to block the movement of the identified vehicle in order to determine the identity of the driver ("I'm about to cut him off, I want to see him"). After driving around the area, **TOOMBS** was unable to locate the identified surveillance vehicle. Your Affiant believes that **TOOMBS** then informed **HERNANDEZ** that **TUCKER** would come to supply the ordered heroin ("I'm about to have her come"). At approximately 1:58 p.m., **TUCKER** exited 1450 Adams Court and walked out of the gate entrance to the Adams Court apartments to the passenger side of the BMW. At approximately 2:01 p.m., **TUCKER** was observed leaving the BMW and walking through the gate entrance to the Adams Court apartments and re-entering 1450 Adams Court. The BMW then departed the

area. Your Affiant believes that **TUCKER** supplied **HERNANDEZ** with heroin that was stored in 1450 Adams Court, as directed by **KHALIF TOOMBS**.

60. On April 18, 2019, at approximately 4:21 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159<sup>21</sup> wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation **TOOMBS** said, "... bro (**TERRY N KELSEY**) goin' to have my phone..." **BROWN** said, "Alright. It's goin' be the same shit (**KELSEY** is going to be selling the same supply of heroin)?" **TOOMBS** said, "Just call me. Yeah, it's just, uh he just goin' have my phone (Toombs Phone 1)." Intercepted communications revealed that **TOOMBS** was leaving for California later that day, and that **KELSEY** would have possession of Toombs Phone 1 while **TOOMBS** was out of town. Further, **KELSEY** was observed driving **TOOMBS**'s previously identified rental vehicle, a gray Dodge Durango bearing Rhode Island license plate DH-617<sup>22</sup>.

61. On that same day, at approximately 5:52 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8159 wherein **TERRY N KELSEY**, using Toombs Phone 1, had a conversation with **NASIR BROWN**. During the conversation **KELSEY** said, "What was you and bro (**TOOMBS**) talking about?" **BROWN** said, "Uh, I was supposed to uh, grab, I might try and grab one (brick of heroin) from him." **KELSEY** said, "One?" **BROWN** said, "Yeah." At approximately 5:54 p.m., an incoming text message was received over **TOOMBS** Phone 1 from the telephone number ending in 8159 that read [Ask bra can grab 2 I got 180 I'll give his 40 for day up]. At approximately 6:12 p.m., an outgoing call was made

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<sup>21</sup> The telephone number ending in 8159 is subscribed to Nasir Brown at an address in Somers Point, New Jersey 08244.

<sup>22</sup> Rhode Island license plate DH-617 is registered to EAN Holdings LLC (Enterprise Rent-A-Car). Enterprise records confirmed that the Durango was rented by Khalif Toombs, using an address in Atlantic City, New Jersey.



from Toombs Phone 1 to the telephone number ending in 8159 wherein **KELSEY** had another conversation with **BROWN**. During the conversation **BROWN** said, "...I'm trying to get two (bricks of heroin). I just have to bring you forty (\$40) back, I got one-eighty (\$180)." **KELSEY** said, "You know who you talking to?" **BROWN** said, "Yeah 'Bus', that's why I'm trying to figure out why the fuck you got his phone." **KELSEY** said, "Yeah...you got to ask him (**TOOMBS**)...got to talk to him, I can't do that (provide **BROWN** with two bricks of heroin for \$180)." **BROWN** said, "You say he on a plane?" **KELSEY** said, "Yeah I got the jack (phone) for now bro-bro." **TOOMBS** gave Toombs Phone 1 to **KELSEY** to conduct his heroin trafficking while **TOOMBS** was in California. **BROWN** was asking **KELSEY** to sell him two bricks of heroin ("trying to get two") for which **BROWN** would pay \$180 up front, and the remaining \$40 after he sold the heroin. Intercepted communications revealed that **TOOMBS** charges different prices for different individuals, and that **BROWN** was paying \$120 per brick of heroin at the time. Throughout numerous intercepted communications, **KELSEY** continued to conduct heroin trafficking over Toombs Phone 1. Further, **KELSEY** used **TIEYESHA TUCKER** and her residence at 1450 Adams Court to distribute the heroin, but also met with and supplied heroin to numerous individuals himself.

62. On April 18, 2019, at approximately 6:24 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 7694<sup>23</sup> wherein **TERRYN KELSEY** had a conversation with **SARAH TALIAFERRO**. During the conversation **KELSEY** directed **TALIAFERRO** to meet him near 1450 Adams Court to conduct a drug transaction. At approximately 6:25 p.m., **TALIAFERRO**'s gold Honda arrived and parked at McKinley Avenue and Tennessee Avenue, outside the Adams Court apartments. At approximately 6:30

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<sup>23</sup> The telephone number ending in 7694 is subscribed to "Jerry Taliaferro," at an address in Atlantic City, New Jersey.

p.m., **KELSEY** entered 1450 Adams Court. At approximately 6:33 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647 wherein **KELSEY** had a conversation with **TIEYESHA TUCKER**. During the conversation **KELSEY** said, “Yeah where the box (of heroin) at?” **TUCKER** said, “It’s in the closet on the right hand side, behind the hamper.” **KELSEY** said, “Oh, alright, um, Macc (**TALIAFERRO**) got a gold car right?” **TUCKER** said, “I don’t know who Macc is?” Your Affiant knows that **TALIAFERRO** uses the nickname “Macc” on social media, one of her telephone numbers is subscribed to “Macc Taliaferro,” and that she drives a gold Honda. Your Affiant believes that **TOOMBS** has **TALIAFERRO**’s contact information in Toombs Phone 1 stored under the name “Macc,” which was why **KELSEY** referred to **TALIAFERRO** by her nickname. Further, **KELSEY** was asking **TUCKER** where the heroin was located inside her residence at 1450 Adams Court. At approximately 6:35 p.m., **KELSEY** exited 1450 Adams Court, and walked to the passenger side door of the Honda. At approximately 6:37 p.m., the Honda departed the area. At approximately 6:39 p.m., **KELSEY** was observed walking past 1450 Adams Court without entering. **KELSEY** walked towards the rear parking lot of the Adams Court apartment. Your Affiant believes that **KELSEY** went into 1450 Adams Court to obtain the heroin to sell to **TALIAFERRO**, but kept the collected payment that **TALIAFERRO** had provided for the heroin, as he did not return to 1450 Adams Court after the transaction. At 11:57 p.m., **TOOMBS**’s rented Dodge Durango, which was observed by surveillance units being driven by **KELSEY**, was observed parked at 17 Brooklyn Avenue. Your Affiant believes that **KELSEY** stores proceeds from the sale of heroin at 17 Brooklyn Avenue.

63. On April 19, 2019, at approximately 1:09 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 4829 wherein **TERRY N KELSEY**

had a conversation with **BLAINE DORSEY**. During the conversation **DORSEY** said, “Yo, I’m ready for a whole one (brick of heroin) if you got it.” **KELSEY** said, “Where you at? You parked at the spot (Adams Court)?” **DORSEY** said, “Yeah, I’ll make it around there.” At approximately 1:27 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 4829 wherein **KELSEY** had another conversation with **DORSEY**. During the conversation **KELSEY** said, “You at Tennessee or New York?” **DORSEY** said, “I see her (**TIEYESHA TUCKER**), I’m on Tennessee but I’m about to go to New York.” Your Affiant believes that after **DORSEY** ordered a brick of heroin (“whole one”) from **KELSEY**, **DORSEY** went to the Adams Court apartments to be supplied by **TUCKER** (“I see her”). At approximately 1:27 p.m., **DORSEY** was observed meeting with **TUCKER**.

64. On April 20, 2019, at approximately 9:31 a.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0564<sup>24</sup> wherein **TERRYN KELSEY** had a conversation with **WILBERT TOOMBS**. During the conversation **WILBERT TOOMBS** said, “...I need two (bricks of heroin) right now. I might need four but I need two right now. I’ll make a call (to a heroin customer) before I get to you.” **KELSEY** said, “Alright.” **WILBERT TOOMBS** said, “Yeah...why he (**KHALIF TOOMBS**) got, he got a different one (heroin stamp) too?” **KELSEY** said, “Uh he got that uh, Frank (heroin stamp “Frank Lucas”)...” **WILBERT TOOMBS** said, “Fort, Fortnite (heroin stamp)?” **KELSEY** said, “Nah, the Frank...” **WILBERT TOOMBS** said, “I don’t know Frank, I ain’t heard of that dope (heroin) man.” **KELSEY** said, “Lucas.” **WILBERT TOOMBS** said, “...tell him to give me a couple of them so I could see how it is. 'Cause I would take one and one (two different heroin stamps) you know what I mean?” **KELSEY** said, “So one and one (one brick of heroin stamped “Apple” and

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<sup>24</sup> The telephone number ending in 0564 is subscribed to Wilbert Toombs, no address given.

one brick of heroin stamped “Frank Lucas”)?” **WILBERT TOOMBS** said, “Yeah shit I don't know how it is. See I need a couple of bags (of heroin) to test that...I don't want to get that if it ain't proper (good quality) man.” **WILBERT TOOMBS** was asking what stamps **KELSEY** was supplying (“Frank Lucas,” “Apple,” and “Fortnite”). Further, **WILBERT TOOMBS** did not want to supply a new stamp until he knew it was of good quality (“I need...to test that”).

65. On April 22, 2019, at approximately 1:21 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 3685<sup>25</sup> wherein **TERRY N KELSEY** had a conversation with **BLAINE DORSEY**. During the conversation **DORSEY** said, “Yo, I'm trying to grab, I need that Apple (heroin stamp) though big bro.” **KELSEY** said, “That shit gone right now.” **DORSEY** said, “For real?” **KELSEY** said, “Yeah um, that back probably tomorrow, that shit gone.” **DORSEY** said, “Alright I need a whole one (brick of heroin), here.” **DORSEY** ordered a brick of heroin from **KELSEY** (“a whole one”), and **DORSEY** wanted heroin stamped “Apple,” which **KELSEY** did not have (“that shit gone”). Your Affiant believes, based on several intercepted communications, that heroin users did not like heroin stamped “Frank Lucas,” which **KHALIF TOOMBS** and **TERRY N KELSEY** were supplying, and that users preferred heroin stamped “Apple.” Further, **KELSEY** informed **DORSEY** that the heroin stamped “Apple,” which was not available, may be available the next day (“back probably tomorrow”). The investigation later learned that the following day **TOOMBS** arranged for **JAMAAL MARSHALL** to drive from Atlantic City to Paterson, New Jersey to obtain a re-supply of heroin stamped “Apple.”

66. On April 22, 2019, at approximately 6:13 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 7694 wherein **TERRY N KELSEY**

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<sup>25</sup> The telephone number ending in 3685 is subscribed to “Wilhelmi Dorsey” at an address in Atlantic City, New Jersey.

had a conversation with **SARAH TALIAFERRO**. During the conversation **KELSEY** directed **TALIAFERRO** to meet near 1450 Adams Court to conduct a drug transaction. At approximately 6:20 p.m., **TALIAFERRO**, driving her previously identified gold Honda, arrived on New York Avenue at the Adams Court apartment complex. At approximately 6:30 p.m., **KELSEY** arrived at New York Avenue at the Adams Court apartment complex in **KHALIF TOOMBS's** rented gray Dodge Durango. **KELSEY** exited the Durango and entered the gate entrance to the Adams Court apartment complex, then entered 1450 Adams Court. At approximately 6:35 p.m., **KELSEY** exited 1450 Adams Court and walked out of the gate entrance to the Adams Court apartments and toward the passenger side of the Honda where he conducted a hand-to-hand transaction with **TALIAFERRO**. The gold Honda then departed north on New York Avenue. **KELSEY** returned to and entered the gray Durango and drove north on New York Avenue. Your Affiant believes that **KELSEY** entered 1450 Adams Court to obtain heroin to supply to **TALIAFERRO**. Further, **KELSEY** did not return to 1450 Adams Court after meeting with **TALIAFERRO** and receiving payment. Your Affiant believes that after collecting the proceeds from the sale, **KELSEY** maintained possession of the proceeds, and stored them in the vehicle, or his residence at 17 Brooklyn Avenue.

67. On April 23, 2019, at approximately 8:19 a.m., **KHALIF TOOMBS** entered 1450 Adams Court. At approximately 8:21 a.m., **TOOMBS** exited 1450 Adams Court carrying a yellow plastic bag, and walked to New York Avenue. Your Affiant believes that after he returned from his trip out of state, **TOOMBS** went to 1450 Adams Court to obtain proceeds from the sale of heroin, and that those proceeds had been collected by **TIEYESHA TUCKER** and **TERRY N KELSEY**.

68. On April 23, 2019, at approximately 1:20 p.m., a call was intercepted between Toombs Phone 1 to the telephone number ending in 1292 wherein **KHALIF TOOMBS** had a conversation with **KHALIF DAVIS**. During the conversation **DAVIS** informed **TOOMBS** that heroin customers, including those of **DAVID RAMIREZ** were reporting that the heroin stamped “Frank Lucas” that **TOOMBS** was supplying was of low quality. **DAVIS** said, “...the Frank’ (heroin stamped Frank Lucas) shit.” **TOOMBS** said, “Oh, they don't want the Frank?” **DAVIS** said, “Nah, not at all like...somebody must have got it from the little nigga, from the little nigga Dave (**DAVID RAMIREZ**), 'cause like the flow (heroin users) was saying...” Based on this, and other intercepted communications, it was learned that the heroin stamped “Frank Lucas” was not liked by heroin users. Your Affiant believes that **DAVIS** was reporting the information back to **TOOMBS**, the supplier of the heroin stamped “Frank Lucas,” even though it was **DAVID RAMIREZ**’s heroin customers (“somebody must have got it from...Dave”).

69. On April 23, 2019, at approximately 9:10 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 0564 wherein **KHALIF TOOMBS** had a conversation with **WILBERT TOOMBS**. During the conversation **WILBERT TOOMBS** said, “Hey, yo, ask, is Busta (**TERRY KELSEY**), is Busta around?” **KHALIF TOOMBS** said, “Um, what’s up?” **WILBERT TOOMBS** said, “Somebody wanted some soft (cocaine).” **KHALIF TOOMBS** said, “I’m about to tell him to call you.” **WILBERT TOOMBS** was trying to purchase cocaine (“soft”) from **KELSEY** through **KHALIF TOOMBS**. At approximately 9:20 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0564 wherein **KHALIF TOOMBS** had another conversation with **WILBERT TOOMBS**. During the conversation **KHALIF TOOMBS** told **WILBERT TOOMBS** that **KELSEY** would sell a quantity of cocaine for \$45 a gram.

70. On April 23, 2019, at approximately 9:41 p.m., an incoming call was received over Toombs Phone 2 from the telephone number ending in 5574<sup>26</sup> wherein **KHALIF TOOMBS** had a conversation with **JAMAAL MARSHALL**. During the conversation they discussed meeting on the following day, April 24, 2019, in order for **TOOMBS** to supply **MARSHALL** with money. Further, **MARSHALL** was then going to meet with a female, and that the female and **MARSHALL** would then “hop on” on the Atlantic City Expressway.

71. On April 24, 2019, at approximately 11:14 a.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 5212 wherein **KHALIF TOOMBS** had a conversation with **MAYDA HERNANDEZ**. During the conversation **HERNANDEZ** said, “Hey sweetie, can I come get a big one (brick of heroin).” **TOOMBS** said, “Yeah.” At approximately 11:15 a.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647 wherein **TOOMBS** had a conversation with Teyesha **TUCKER**. During the conversation **TOOMBS** said, “Hey, are you still ain't getting my FaceTime?” **TUCKER** said, “I did just get it this time. Something's going on.” **TOOMBS** said, “Oh alright. Um Mayda, Mayda about to come get a whole one (brick of heroin).” **TUCKER** said, “Alright.” Your Affiant believes that after **HERNANDEZ** ordered a brick of heroin (“big one”), **TOOMBS** called **TUCKER** and directed her to supply **HERNANDEZ**. Further, **TOOMBS** asked **TUCKER** if she was receiving his FaceTime communications. Your Affiant knows that **TOOMBS**'s primary method of communicating with **TUCKER** regarding the distribution of heroin, is via FaceTime.

72. On April 24, 2019, at approximately 3:10 p.m., **KHALIF TOOMBS**'s previously identified rented gray Dodge Durango was observed parked at **TOOMBS**'s residence at 154

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<sup>26</sup> The telephone number ending in 5574 is subscribed to Jamaal Marshall at an address in Atlantic City, New Jersey.

Dunlin Lane. At approximately 3:13 p.m., **JAMAAL MARSHALL**'s gray Volkswagen Passat was parked at 154 Dunlin Lane. At approximately 3:33 p.m., **MARSHALL** was observed entering the Volkswagen alone and departing in the Volkswagen from 154 Dunlin Lane. **MARSHALL** was followed to his residence at 914 Lexington Place, Atlantic City, New Jersey where the Volkswagen was parked from 3:50 p.m. until 3:59 p.m. Marshall then departed 914 Lexington Place in the Volkswagen, and at approximately 4:11 p.m., the Volkswagen stopped in the driveway near a shopping area in Atlantic City, and a female, IF-5, entered the Volkswagen. The Volkswagen then drove to the parking lot at the McDonald's located at 31 South Arkansas Avenue, Atlantic City, New Jersey. At approximately 4:18 p.m., **TOOMBS** arrived in his Durango and parked next to the Volkswagen. **MARSHALL** and IF-5 entered the Durango, with **MARSHALL** driving, and **TOOMBS** entered the Volkswagen.

73. At approximately 4:22 p.m., the Durango departed Atlantic City via the Atlantic City Expressway. The Durango was then followed as it took the Garden State Parkway north to exit 156 in Paterson, New Jersey. At approximately 6:36 p.m., an incoming call was received over Toombs Phone 2 from the telephone number ending in 5574 wherein **KHALIF TOOMBS** had a conversation with **JAMAAL MARSHALL**. During the conversation **MARSHALL** said, "Yo hit (call) your man (heroin supplier). Tell him I'm like fifteen minutes away." **TOOMBS** said, "Alright." At approximately 6:44 p.m., the Durango exited the Garden State Parkway at exit 156. The Durango then took a circuitous route, making several consecutive right turns until visual contact was lost in the area of the I-80 off ramp at McLean Boulevard in Paterson, New Jersey.

74. At approximately 7:00 p.m., the Durango was observed at East 42nd Street and Market Street in Paterson, New Jersey. The Durango was followed as it returned to the Garden



State Parkway south where it was followed back to the Atlantic City area. The Durango arrived and parked at New York Avenue in front of the gate to the Adams Court apartments. At approximately 9:21 p.m., **KHALIF TOOMBS** walked from the center courtyard of the Adams Court apartments to the gate leading to New York Avenue. The rear hatch of the Durango opened and **MARSHALL** reached in the rear of the Durango and retrieved a large box. At approximately 9:22 p.m., **MARSHALL** carried the large box from the Durango on New York Avenue through the gate entrance to the Adams Court apartments and into 1450 Adams Court. At approximately 9:27 p.m., **MARSHALL** exited 1450 Adams Court and walked to New York Avenue. Your Affiant believes that **MARSHALL** traveled to Paterson, New Jersey to obtain a re-supply of heroin. Further, based on surveillance of **MARSHALL** on this and other trips to Paterson, your Affiant believes that **MARSHALL** collects stored proceeds to purchase the heroin from 154 Dunlin Lane and 914 Lexington Place prior to traveling to Paterson.

75. On April 24, 2019, as **JAMAAL MARSHALL** traveled to Paterson, New Jersey, court authorized intercepted communications over Toombs Phone 1 revealed that **KHALIF TOOMBS** continued to arrange drug transactions. However, just prior to **MARSHALL**'s arrival, **TOOMBS** informed his heroin customers that he only had limited supplies remaining.

76. On April 24, 2019, at approximately 4:48 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 8029, used by **VALARIE LAMAR**, that read [I need to c u. Same]. After a series of subsequently intercepted communications between **KHALIF TOOMBS** and **LAMAR** wherein **TOOMBS** directed **LAMAR** to go to New York Avenue by 1450 Adams Court, at approximately 4:57 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8029 wherein **TOOMBS** had a conversation with **LAMAR**. During the conversation **TOOMBS** said, "Five

(bricks of heroin) right?” **LAMAR** said, “Yeah, I’m over here (Adams Court).” **TOOMBS** said, “I’m walking to you now, I see you.” After **LAMAR** ordered five bricks of heroin from **TOOMBS** (“Same,” “Five”), your Affiant believes that **TOOMBS** supplied **LAMAR** heroin that was stored at 1450 Adams Court.

77. On April 24, 2019, at approximately 5:13 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 6419 wherein **KHALIF TOOMBS** had a conversation with **JEREMY CARLL**. During the conversation **CARLL** said, “Can I get uh, one big one (brick of heroin)?” **TOOMBS** said, “Um I got, I got four smalls (bundles of heron) for you right now.” **CARLL** said, “Shit.” **TOOMBS** said, “Meet me over there (1450 Adams Court) in ten minutes.” **CARLL** said, “Alright I’m on New York (avenue) now.” After **CARLL** ordered a brick (“one big one”) of heroin, **TOOMBS** responded that he only had four bundles (“four smalls”) remaining. They then agreed that **CARLL** would meet him at 1450 Adams Court (“over there,” “on New York”) to conduct the transaction. This transaction was conducted while **JAMAAL MARSHALL** was traveling to Paterson, New Jersey to acquire a heroin re-supply. After **MARSHALL** returned to 1450 Adams Court with the large box, **TOOMBS** made several calls to heroin customers and informed them of the new heroin stamps that he had available.

78. On April 25, 2019, at approximately 10:25 a.m., an outgoing text message was sent from Toombs Phone 1 to the telephone number ending in 1292, used by **KHALIF DAVIS**, that read [Fire around cous, Apple and Rolex fresh batch]. At approximately 10:25 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 1292 that read [Ard bet]. During the period of interception **KHALIF TOOMBS** often sent text messages or made telephone calls to individuals and informed them of the new heroin stamps.

**TOOMBS** was telling **DAVIS** that the new heroin (“fresh batch”) was of high quality (“fire”) and contained the stamps “Apple” and “Rolex.”

79. On April 25, 2019, at approximately 12:34 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 0564 wherein **KHALIF TOOMBS** had a conversation with **WILBERT TOOMBS**. During the conversation **WILBERT TOOMBS** said, “...ask um, Busta (**TERRY N KELSEY**) um, tell him someone wants half a gram of powder (cocaine).” **KHALIF TOOMBS** said, “Half a gram?” **WILBERT TOOMBS** said, “Yeah, of powder.” **KHALIF TOOMBS** said, “I don't think he (**KELSEY**) do that (small amount).” At approximately 12:43 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 0564 wherein **KHALIF TOOMBS** had another conversation with **WILBERT TOOMBS**. During the conversation **KHALIF TOOMBS** said, “He (**KELSEY**) don't do that little bit, he don't take that little bit though (half a gram).” **WILBERT TOOMBS** said, “...how much he (customer) got to spend?” **KHALIF TOOMBS** said, “Uh probably do like three grams or some shit...” **WILBERT TOOMBS** said, “What's three go for (cost) son?” **KHALIF TOOMBS** said, “I think they like forty, forty-five (\$45) a joint (gram)...he going to do like three of them (grams), he ain't doing one (gram) dad.” **WILBERT TOOMBS** said, “But listen oh, I'm on my way around and I need one (brick of heroin).” **KHALIF TOOMBS** said, “Uh let me see if she (**TIEYESHA TUCKER**) there, she just left (1450 Adams Court), hold on.” Prior to ordering heroin from his son, **WILBERT TOOMBS** was asking **KHALIF TOOMBS** to acquire cocaine (“half a gram of powder”) from **KELSEY**, and **KHALIF TOOMBS** responded that **KELSEY** would not sell a half, or one, gram of cocaine, but that he would only sell a minimum of three grams at a time (“probably like three grams”).

80. On April 25, 2019, at approximately 2:31 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 7694, used by **SARAH TALIAFERRO**, that read [I wanted to get 3 but have 95, I can get u the other 5 dollars at 6pm when I come c u when justin gets off]. **KHALIF TOOMBS** responded [Ok]. Based upon the information obtained through this investigation, it is your Affiant's belief that **TALIAFERRO** was asking that **TOOMBS** front her the heroin, despite not having the full payment at the time of purchase. Further, your Affiant is aware that "justin" refers to **TALIAFERRO**'s boyfriend, who is also known to obtain heroin from **KHALIF TOOMBS**. Your Affiant believes that **TALIAFERRO** often obtains heroin for both herself and her boyfriend and that they often pool their money in order to purchase more heroin.

81. On April 26, 2019, at approximately 10:27 a.m., incoming text messages were received over Toombs Phone 1 from the telephone number ending in 1292, used by **KHALIF DAVIS**, which read, [I need 3], [2 apple and 1 of the other], and [I will let you know when I'm at the spot]. Based upon information obtained in this investigation, it is your Affiant's belief that **DAVIS** was ordering three bricks of heroin ("2 apple and 1 of the other") and that he knew to pick up the heroin at a known location ("I will let you know when I'm at the spot").

82. On April 26, 2019, at approximately 12:21 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 1292 wherein **KHALIF TOOMBS** had a conversation with **KHALIF DAVIS**. During the conversation **DAVIS** said, "I'm about to pull up (to 1450 Adams Court)." **TOOMBS** said, "Alright, I'm about to send her (**TIEYESHA TUCKER**) out." **DAVIS** said, "Alright uh, two, two Apple (bricks of heroin stamped Apple) and one of the other (brick of heroin stamped Rolex)." At approximately 12:27 p.m., **DAVIS** was observed parking a white Mitsubishi Mirage on New York Avenue near the gate entrance to

the Adams Court apartments. At approximately 12:30 p.m., **TUCKER** exited 1450 Adams Court. At approximately 12:32 p.m., **TUCKER** was observed meeting with **DAVIS** at the Mitsubishi. At approximately 12:33 p.m., **TUCKER** re-entered 1450 Adams Court. Your Affiant believes **TUCKER** supplied **DAVIS** with heroin that is stored at 1450 Adams Court. Further, your Affiant believes that **TUCKER** collected payment from **DAVIS**, and stored those proceeds inside 1450 Adams Court.

83. On April 27, 2019, at approximately 2:47 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **KHALIF TOOMBS** had a conversation with **DEAN JOHNSON**. During the conversation, **TOOMBS** said, “Um what’s up?” **JOHNSON** responded “Same thing, a nickel (five bricks of heroin).” **TOOMBS** said, “...mid-town?” **JOHNSON** responded “Yeah, yeah, yeah, I’m on, I’m uh yeah, at the joint...where we been going...” Based upon the information obtained in this investigation, your Affiant believes that **TOOMBS** was storing heroin at multiple locations, and would direct customers to specific locations depending on the day (“mid-town”). Further, in the conversation **JOHNSON** made clear that he was regularly buying five bricks of heroin from **TOOMBS** (“Same thing, a nickel”), and that **JOHNSON** knew exactly where **TOOMBS** wanted him to go to pick up the heroin (“I’m uh yeah, at the joint.”). At approximately 3:20 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **KHALIF TOOMBS** had another conversation with **DEAN JOHNSON**. During the conversation, **JOHNSON** said, “There’s police and shit over here. I’m right here at the Cedar’s on Pennsylvania and um, Arctic right here.” Behind the street from, from the chicken joint.” **TOOMBS** responded “Alright, I’m a light away.” Based upon information received in this investigation, your Affiant believes that **JOHNSON** was alerting **TOOMBS** to the presence of

police in order to ensure that they both would evade law enforcement detection. (“There’s police and shit over here.”)

84. On April 28, 2019, at approximately 1:30 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 1292 wherein **KHALIF TOOMBS** had a conversation with **KHALIF DAVIS**. During the conversation **DAVIS** said, “Rolex (heroin stamp) cuz my bad.” **TOOMBS** said, “All Rolex?” **DAVIS** said, “Yeah.” **TOOMBS** said, “Alright I gave you two and two, let me fix that, I got you.” There were no intercepted communications between **TOOMBS** and **DAVIS** on this day prior to this. On numerous other occasions during intercepted communications **TOOMBS** and others have discussed their use of FaceTime, Snapchat and other social media platforms. Your Affiant believes that **TOOMBS** and **DAVIS** used an alternate method for communicating to arrange for **TOOMBS** to supply **DAVIS** with heroin. **DAVIS** then called **TOOMBS** to say that he had wanted four bricks of heroin stamped “Rolex” (“All Rolex”), while **TOOMBS** acknowledged that he planned to supply **DAVIS** with two bricks of heroin stamped “Rolex” and two bricks of heroin containing another stamp (“two and two”).

85. On April 29, 2019, at approximately 12:44 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 4829 wherein **KHALIF TOOMBS** had a conversation with **BLAINE DORSEY**, a/k/a “Ab.” During the conversation **DORSEY** said, “...can I come see you?” **TOOMBS** said, “Alright I got to make sure she (**TIEYESHA TUCKER**) there, what you need?” **DORSEY** said, “A trey (three bundles of heroin).” After **TOOMBS** directed **DORSEY** to go to Adams Court to meet with **TUCKER**, at approximately 12:57 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 4829 wherein **TOOMBS** had another conversation with **DORSEY**. During the

conversation **DORSEY** said, "...I need a whole one (brick of heroin) somebody just came for two joints (heroin customer came for two bundles). I need a whole one." **TOOMBS** said, "Alright, go to New York (avenue)." After **DORSEY** ordered three bundles of heroin ("a trey"), **DORSEY** called back and increased his order to one brick ("a whole one") because a heroin customer ordered two bundles ("two joints"). Based on intercepted communications in conjunction with surveillance, in addition to interviews with CHSs, your Affiant knows that **DORSEY** is a heroin dealer who sells heroin on the street in Atlantic City.

86. On April 29, 2019, at approximately 1:15 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 7694, used by **SARAH TALIAFERRO**, that read [I have 95 is it okay if I give you the other 5 at 6:00 when justin gets off please]. **KHALIF TOOMBS** responded [Ok]. Based upon the information obtained in this investigation, your Affiant believes that **TALIAFERRO** was again asking that **TOOMBS** front her the heroin despite not having full payment, and that she would have full payment once she received it from "justin." ("is it okay if I give you the other 5 at 6:00 when justin gets off please.") Based upon multiple, similar text messages and conversations, your Affiant believes that **TALIAFERRO** and "justin" pool their money, and that after **TALIAFERRO** obtains the heroin, she shares it with "justin."

87. On April 30, 2019, beginning at approximately 3:39 p.m., in a series of intercepted communications between Toombs Phone 1 and the telephone number ending in 0564, **WILBERT TOOMBS** arranged a number of drug transactions with **KHALIF TOOMBS**. At approximately 3:39 p.m., **WILBERT TOOMBS** said, "I'm on my way, Um, need a deuce (two bricks of heron)." At approximately 4:31 p.m., **WILBERT TOOMBS** said, "Uh two (bricks of heroin)." At approximately 4:41 p.m. **WILBERT TOOMBS** said, "Let me get three

(bricks of heroin) man.” At approximately 11:56 p.m., **WILBERT TOOMBS** again called and requested that **KHALIF TOOMBS** be available through the night to sell heroin, as it was the first of the month, and customers would have money. **WILBERT TOOMBS** said, “Yeah because that, that's when you know I'm going to be standing there and they (heroin customers) going to be like, there are already people out here calling me and asking me for uh you know bundles, bundles, bundles, bundles, let me get two buns when I go get my money, I'm going to be right there when they collecting. So make sure you at least have ten of them or eight of them ready while I can come grab them, or three at a time something like that you know, and I'm going to have you know for the two that I already got you know. Yeah, word, they going to be jumping, ain't got to worry about that, that shit going tonight.” **KHALIF TOOMBS** said, “Alright.” Your Affiant believes that **WILBERT TOOMBS** was explaining that government assistance payments would be issued thorough Electronic Benefits Transfer cards after midnight, as it was the first of the month, and heroin customers would then have money to purchase more heroin.

88. On April 30, 2019, at approximately 5:12 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9224<sup>27</sup> wherein **KHALIF TOOMBS** had a conversation with **PHILIP SURACE**. During the conversation **SURACE** informed **TOOMBS** that **JOSEPH AVERSA** was coming to 1450 Adams Court to conduct a drug transaction. At approximately 5:13 p.m., **AVERSA** arrived driving his white BMW into the parking lot of the Adams Court Apartments. At approximately 5:18 p.m. an outgoing call was made from Toombs Phone 1 to the telephone number ending in 9224 wherein **TOOMBS** had another conversation with **SURACE**. During the conversation **TOOMBS** told **SURACE** to have

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<sup>27</sup> The telephone number ending in 9224 is subscribed to “Wendy Lu” at an address in Oakland, California.



**AVERSA** follow him (**TOOMBS**) away from the parking lot. **TOOMBS** said, "...there's (security) cameras back there now, that's why I didn't want him (**AVERSA**) to pull in there..." At approximately 5:18 p.m., **TOOMBS** exited 1450 Adams Court and walked to the parking lot. **TOOMBS** then walked through the parking lot onto McKinley Avenue eastbound towards Tennessee Avenue. **AVERSA** exited the parking lot in the BMW eastbound towards Tennessee Avenue. **TOOMBS** entered and then quickly exited the BMW as it was parked on Tennessee. Your Affiant believes **TOOMBS** supplied **AVERSA** with heroin that was stored at 1450 Adams Court. Further, **TOOMBS** did not want **AVERSA** to park in the parking lot in order to conduct their criminal activity out of view of the Adams Court apartment complex security cameras. On numerous subsequent occasions, **AVERSA** and **SURACE** met **TOOMBS** or **TOOMBS**'s heroin distributors in **AVERSA**'s white BMW to conduct drug transactions.

89. On April 30, 2019, at approximately 5:37 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 6419 wherein **KHALIF TOOMBS** had a conversation with **JEREMY CARLL**. During the conversation **CARLL** said, "I need two big ones (two bricks of heroin) and two little ones (two bundles of heroin) with it." **TOOMBS** responded, "Alright." **CARLL** then said, "This lady in the, in the front of me in the red car she always pulling in and out of here." **TOOMBS** said "She's what?" **CARLL** responded "She's always pulling in and out every time I come here so I got to be careful." **TOOMBS** told him "Alright, oh just yeah, just um, or if you can just spin (drive around) the block and see if there's some parking by the back (of Adams Court) a little bit." Based upon the information obtained in this investigation, your Affiant believes that **CARLL** ordered two bricks and two bundles of heroin ("I need two big ones and two little ones with it"). Further, your Affiant believes that **CARLL** was concerned about a person who may see them as they conduct their transaction and

was discussing it with **TOOMBS** to ensure that they both would avoid detection (“she’s always pulling in and out every time I come here so I got to be careful”).

90. On April 30, 2019, at approximately 7:26 p.m., and incoming text message was received over Toombs Phone 1 from the telephone number ending in 8029, used by **VALARIE LAMAR**, that read [Need to c u. 5]. At approximately 7:52 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8029 wherein **KHALIF TOOMBS** had a conversation with **LAMAR**. During the conversation **TOOMBS** said, “Yeah you can come down.” **LAMAR** said, “Alright.” After **LAMAR** ordered five bricks of heroin (“5”), your Affiant believes that **TOOMBS** drove to **LAMAR**’s residence at the High Gate apartments and told **LAMAR** she could come down from her apartment building to meet him in the back parking lot to conduct the drug transaction. **TOOMBS** and **LAMAR** were observed meeting in the back parking lot of **LAMAR**’s apartments to conduct drug transactions on several occasions.

91. On May 1, 2019, at approximately 8:05 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 3163, used by **SARAH TALIAFERRO**, that read [Okay, I need one please and than when I get done work ill probably need two more before justin gets off and I get the normal 3]. Based upon information obtained in this investigation, your Affiant believes that **TALIAFERRO** ordered one bundle of heroin and was informing **TOOMBS** that she would be ordering two more bundles after **TALIAFERRO** is out of work, and three more bundles of heroin, her usual order, once “justin” is done at work. (“one please,” “two more,” “normal three”).

92. On May 1, 2019, at approximately 10:41 a.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9224 wherein **KHALIF TOOMBS** had a conversation with **PHILIP SURACE**. During the conversation **TOOMBS** agreed to supply

**SURACE** with heroin and directed him to an area near 1450 Adams Court to conduct the drug transaction. At approximately 11:02 a.m., **JOSEPH AVERSA**'s previously identified BMW parked on New York Avenue near 1450 Adams Court. At approximately 11:20 a.m., **TOOMBS**'s previously identified rented Dodge Durango was observed driving north on New York Avenue. At approximately 11:26 a.m., **TERRYN KELSEY** walked from the front parking lot of the Adams Court apartments and entered 1450 Adams Court. At approximately 11:26 a.m., **KELSEY** exited 1450 Adams Court and met with **SURACE** in the passenger side of the BMW parked on New York Avenue. Your Affiant believes that **KELSEY** supplied heroin that was stored in 1450 Adams Court to **SURACE** and **AVERSA** at the direction of **TOOMBS**.

93. After the meeting, the BMW was followed to the Wawa located at 5212 Ventnor Avenue, Ventnor, New Jersey. The driver of the BMW, **JOSEPH AVERSA**, exited the BMW and met with an identified individual in the Wawa parking lot. The identified individual was then followed as he drove his vehicle to a residence in Ventnor, New Jersey. The identified individual exited the vehicle and walked over to a trash can that was located on the side of the street near the residence. The identified individual then placed items in a trash bag inside the can and then entered the residence. Case agents then retrieved the trash bag from the trash can where the identified individual had discarded the items. A white paper object was recovered from the area of the top of the trash bag. Inside the paper object were torn up wax folds stamped "Apple" in green lettering that was similar in appearance to packaging purchased during the investigation in controlled drug buys from **WILBERT TOOMBS** and **DAVID RAMIREZ**. Your Affiant believes that **KELSEY** supplied **SURACE** and **AVERSA** with heroin containing the stamp "Apple" from 1450 Adams Court. **AVERSA** then sold the heroin to the identified individual, who consumed the heroin and discarded the packaging in a trash can.

94. On May 1, 2019, Detectives from ACPO attempted to contact **KHALIF TOOMBS** at his residence at 154 Dunlin Lane<sup>28</sup>. **TOOMBS** did not answer the door and the Detectives left a business card on the front door. **TOOMBS**'s rented gray Dodge Durango was parked in the driveway at the time. At approximately 10:52 a.m., an incoming call was received over Toombs Phone 2 from the ACJF wherein **TOOMBS** had a conversation with IM-1, who was an inmate at the facility. During the conversation with IM-1, **TOOMBS** discovered the business card from the ACPO Detectives on his front door. **TOOMBS** informed IM-1 that he was reviewing surveillance footage from a security camera at his residence and described the Detectives at his front door. On that same day, at approximately 1:36 p.m., an outgoing call was made from Toombs Phone 2 to an Enterprise Rent-A-Car office wherein **KHALIF TOOMBS** had a conversation with an employee of Enterprise Rent-A-Car. During the conversation **TOOMBS** explained that he wanted to exchange his current rental vehicle for another rental vehicle. Your Affiant believes that **TOOMBS** attempted to change his rental vehicle after it had likely been seen by the ACPO Detectives parked in his driveway at 154 Dunlin Lane. Further, surveillance revealed that after this day, **TOOMBS** ceased parking his rental vehicles in his driveway at 154 Dunlin Lane, and began parking them in unassigned guest parking spaces at the end of Dunlin Lane, or at times, one block away from his residence. Your Affiant believes that after **TOOMBS** learned that law enforcement had been at his residence, he began parking his vehicles away from the residence in order to avoid having law enforcement associate the vehicles with **TOOMBS** and his residence, as he used the rental vehicles to meet with customers and distribute his heroin.

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<sup>28</sup> ACPO detectives were attempting to interview **TOOMBS** regarding a separate investigation conducted by that office.

95. On May 2, 2019, at approximately 3:52 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation, **BROWN** informed **TOOMBS** that he was going to 1450 Adams Court to obtain four bricks of “Rolex”-stamped heroin from **TOOMBS**. At approximately 3:59 p.m., **TOOMBS** was observed exiting a white Jeep Cherokee parked on New York Avenue by 1450 Adams Court. **TOOMBS** then entered 1450 Adams Court. At approximately 4:06 p.m., **TOOMBS** exited 1450 Adams Court and walked to New York Avenue. **BROWN** then parked his blue Nissan Sentra on New York Avenue. **BROWN** exited the Nissan, walked north on New York Avenue, and entered the passenger side of **TOOMBS**’s Jeep. A short time later **BROWN** exited the Jeep and returned to the Nissan. Your Affiant believes **TOOMBS** supplied **BROWN** with heroin that was stored in 1450 Adams Court. Further, based on intercepted communications it was learned that Enterprise Rent-a-Car did not have another vehicle available for **TOOMBS** to rent at the time, and that **TOOMBS** had ceased driving his rented Dodge Durango, and began driving the Jeep. Your Affiant believes that **TOOMBS** did not want to conduct his heroin trafficking activity in the rented Dodge Durango that had been parked at 154 Dunlin Avenue, because it had likely been seen by law enforcement.

96. On May 2, 2019, at approximately 5:08 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419, used by **JEREMY CARLL**, that read [I need eight small ones are you going to be around in 15 minutes]. **KHALIF TOOMBS** sent a reply text message to confirm that he would be in Atlantic City in 25 minutes. At approximately 5:18 p.m., **CARLL** arrived and parked on New York Avenue in a maroon Ford Explorer. **TOOMBS** exited 1450 Adams Court and walked to New York Avenue and entered the front passenger side of the Ford. **TOOMBS** handed **CARLL** a white object, and then

exited the vehicle. Your Affiant believes **TOOMBS** supplied **CARLL** with eight bundles (“eight small ones”) of heroin that had been stored in 1450 Adams Court.

97. On May 3, 2019, at approximately 10:22 a.m., **NASIR BROWN**’s blue Nissan Sentra was parked on the right side of 50 Mays Landing Road, Apartment 71, Somers Point, New Jersey. At approximately 10:25 a.m., **BROWN** exited Apartment 71 and walked out of view of surveillance. Three minutes later, at approximately 10:28 a.m., **BROWN** returned and entered into Apartment 71. At approximately 10:35 a.m., a minivan style blue cab (unknown make and model) arrived and parked in front of Apartment 71. **BROWN** again exited Apartment 71 and entered the rear passenger seat of the cab. The blue minivan cab departed the area out of view of surveillance. Three minutes later, at approximately 10:38 a.m., the blue minivan cab returned and parked again in front of Apartment 71. **BROWN** exited the van and walked into Apartment 71. Your Affiant believes, based on numerous intercepted communications followed by physical surveillance wherein **BROWN** meets with multiple individuals for short periods of time, that **BROWN** distributes heroin to customers out of 50 Mays Landing Road, Apartment 71, and that **BROWN** stores heroin and proceeds from the sale of heroin inside the residence.

98. On May 3, 2019, at approximately 1:24 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation **BROWN** ordered four bricks of heroin and requested that **TOOMBS** “make one of them Apple (heron stamp).” At approximately 1:43 p.m., **BROWN** parked his blue Nissan Sentra on New York Avenue outside the gate entrance to the Adams Court apartments. At approximately 1:55 p.m., **TIEYESHA TUCKER** exited 1450 Adams Court, walked to, and entered the Nissan. The Nissan then drove into the parking lot of the Adams Court apartments. At approximately 1:57 p.m., **TUCKER**

walked from the parking lot and re-entered 1450 Adams Court. At approximately 2:08 p.m., the Nissan exited the parking lot and was followed as it parked in front of a Chevrolet Suburban on Brigantine Boulevard in Atlantic City, New Jersey. An individual exited the Chevrolet Suburban and walked into an unidentified apartment on Brigantine Boulevard. The individual then exited the apartment and entered **BROWN**'s Nissan. A short time later the individual exited the Nissan, and the Nissan departed the area. At approximately 3:00 p.m., **BROWN** arrived at the parking lot of 50 Mays Landing Road, Somers Point, New Jersey. **BROWN** parked the Nissan and entered Apartment 71. Your Affiant believes that after **BROWN** ordered four bricks of heroin from **TOOMBS**, **TOOMBS** directed **TUCKER** to meet with **BROWN**. **TUCKER** then met with **BROWN** and supplied him heroin that had been stored in 1450 Adams Court. Further, your Affiant believes that **BROWN** met with the individual and supplied the individual with heroin. **BROWN** then returned to 50 Mays Landing Road, Apartment 71 with proceeds from the sale of heroin.

99. On May 3, 2019, at approximately 5:05 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419, used by **JEREMY CARLL**, that read [Heading to City can I get two big ones I have 290 can I give you the other 10 tomorrow]. At 5:18 p.m. **CARLL** sent another text message saying [The lady sitting outside do you want me to go to Tennessee] and **TOOMBS** responded [Nah you fine Just take her around the block]. Your Affiant believes that **CARLL** was asking that **TOOMBS** front him the full amount of two bricks of heroin, despite the fact that he didn't have the full payment. ("I have 290 can I give you the other ten tomorrow.") Further, **CARLL** was again concerned about being seen by witnesses during the transaction ("the lady sitting outside"). On the same day, at approximately 6:39 p.m., an incoming call was received over Toombs Phone 1 from the

telephone number ending in 6419, wherein **TOOMBS** had a conversation with **CARLL**. **CARLL** said “Sim I got your ten bucks and can I get nine more little (bundles of heroin) ones?” **TOOMBS** said “Nine more?” and **CARLL** responded “Nine more yeah, I’m on New York but I’m parked back away from that corner because of that lady.” Your Affiant believes that **CARLL** returned with the money he owed **TOOMBS** from the heroin he purchased earlier that day (“I got your ten bucks”) and that he was ordering nine more bundles (“nine more little ones.”) Further, **CARLL** informed **TOOMBS** that he was parked further away from the meeting location, as he was again concerned about detection. (“I’m parking back away from that corner because of the lady.”)

100. On May 3, 2019, at approximately 9:26 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation **TOOMBS** directed **BROWN** to the area of the Adams Court apartment to conduct a drug transaction. During the conversation **TOOMBS** said, “Yeah I’ll be around there (1450 Adams Court) in like ten, fifteen minutes.” **BROWN** said, “...can you call me when you get around there, I’m a leave from the crib (50 Mays Landing Road, Apartment 71).” **TOOMBS** said, “What is it one (brick of heroin)?” **BROWN** said, “No, no...my regular.” **TOOMBS** said, “Alright you want all, all the 'Rollie (heroin stamped “Rolex”)’?” **BROWN** said, “Yeah.” At approximately 9:46 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647 wherein **TOOMBS** had a conversation with **TIEYESHA TUCKER**. During the conversation **TOOMBS** asked where **TUCKER** stored specific heroin inside 1450 Adams Court. **TOOMBS** said, “There’s no Apple (heroin stamp) under there. Where it’s at? **TUCKER** said, “The toys.” **TOOMBS** said, “Alright.” Your Affiant believes that **TUCKER** was telling **TOOMBS** that the



heroin stored inside 1450 Adams Court was kept in an area near children's toys. A short time later, **BROWN** arrived in his blue Nissan Sentra and parked in the parking lot in the rear of 1450 Adams Court. **TOOMBS** exited a black sport utility vehicle and entered the passenger side of the Nissan. A short time later **TOOMBS** exited the Nissan and re-entered the sport utility vehicle. The Nissan then exited the parking lot. Your Affiant believes **TOOMBS** supplied **BROWN** with heroin stamped "Apple" that was stored in 1450 Adams Court.

101. On May 6, 2019, at approximately 12:18 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9224 wherein **KHALIF TOOMBS** had a conversation with **PHILIP SURACE**. During the conversation **TOOMBS** instructed **SURACE** to meet near the Adams Court apartments to conduct a drug transaction. At approximately 12:19 p.m., **TOOMBS** arrived on New York Avenue in his previously identified white Jeep. At approximately 12:20 p.m., **TOOMBS** walked from New York Avenue and entered 1450 Adams Court. At approximately 12:20 p.m., **SURACE** was observed walking from the area of McKinley Avenue to New York Avenue where he entered the passenger side of **TOOMBS's** white Jeep. **TOOMBS** then exited 1450 Adams Court, walked to, and entered the driver side of the white Jeep. At approximately 12:22 p.m., **SURACE** exited the white Jeep. The white Jeep then departed the area. Your Affiant believes that **TOOMBS** supplied **SURACE** with a quantity of heroin that had been stored in 1450 Adams Court.

102. On May 6, 2019, at approximately 12:30 p.m., **JAMAAL MARSHALL**, wearing a reflective safety vest, entered a gray Nissan Altima which was parked at 17 Brooklyn Avenue, Atlantic City, New Jersey. **MARSHALL** departed in the Nissan Altima and drove to his residence at 914 Lexington Place. Marshall then departed 914 Lexington Place in the Nissan Altima and at approximately 12:53 p.m., returned to 17 Brooklyn Avenue. **MARSHALL** parked

the Nissan Altima, walked to his gray Volkswagen Passat which had been parked at the residence, removed a child safety seat, and carried it into 17 Brooklyn Avenue. At approximately 12:55 p.m., **MARSHALL** entered the Volkswagen and departed the area. At approximately 1:09 p.m., the Volkswagen arrived at 154 Dunlin Lane. A short time later the Volkswagen, being driven by **MARSHALL**, drove back to Atlantic City, and departed Atlantic City via the Atlantic City Expressway. The Volkswagen was then followed as it took the Garden State Parkway north to exit 156 in Paterson, New Jersey. At approximately 3:18 p.m., the Volkswagen exited the Garden State Parkway at exit 156 and was followed to the apartment building on the corner of East 38<sup>th</sup> Street and 21<sup>st</sup> Avenue in Paterson, New Jersey (in the exact area that surveillance had lost visual contact with **MARSHALL** on April 24, 2019). At approximately 3:26 p.m., the Volkswagen backed into an alley on the south side of the apartment building. At approximately 3:34 p.m., the Volkswagen, being driven by **MARSHALL**, exited the alley and departed the area. At that same time, **TYJUAN DEMAREST** was observed standing outside the apartment building near the alley. At approximately 5:40 p.m., the Volkswagen arrived in parking lot of the Adams Court apartments and backed into a parking space behind 1450 Adams Court. **MARSHALL**, still wearing the reflective safety vest, exited the Volkswagen and removed a large box from the trunk of the vehicle. At approximately 5:42 p.m., **MARSHALL** carried the large box into the rear sliding door entrance to 1450 Adams Court. At approximately 5:44 p.m., **MARSHALL** returned to the Volkswagen and removed his reflective safety vest and placed it in the vehicle. Your Affiant believes, based on surveillance of **MARSHALL** on this, and other trips to Paterson, that **MARSHALL** traveled from Atlantic City, New Jersey to Paterson, New Jersey to obtain a supply of heroin from **DEMAREST**. Further, your Affiant believes that

**MARSHALL** collects stored proceeds to purchase the heroin from 154 Dunlin Lane, 17 Brooklyn Avenue, and 914 Lexington Place prior to traveling.

103. Court authorized interception of communications over Toombs Phone 1 revealed that drug transactions were still being arranged by **KHALIF TOOMBS** with various heroin customers while **MARSHALL** traveled to Paterson, New Jersey.

104. On May 6, 2019, at approximately 2:10 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **KHALIF TOOMBS** had a conversation with **DEAN JOHNSON**. During the conversation **JOHNSON** said, “Just need to get next to you....same thing (same quantity of heroin) nigga.” **TOOMBS** said, “Alright, you was at you was at six, seven (bricks of heroin) last time.” **JOHNSON** said, “I know, I know, I know, that’s all I got on me. I’m out and about already. You feel me?” **TOOMBS** said, “Alright, I got you, I got you.” **JOHNSON** said, “I mean, I’m a make it, I’m a make it worth your while...” **TOOMBS** said, “Alright, uh five minutes.” At approximately 2:19 p.m., an outgoing text was sent from Toombs Phone 1 to the telephone number ending in 9066 that read [Bout to pull up]. At approximately 2:21 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **TOOMBS** had another conversation with **JOHNSON**. During the conversation **TOOMBS** and **JOHNSON** discussed their meeting location near **JOHNSON**’s residence. This transaction was conducted while **JAMAAL MARSHALL** traveled to Paterson, New Jersey for a heroin re-supply. Your Affiant believes that **TOOMBS** stores heroin in multiple residences, and while he informs his customers that he is “low” on supply, he often distributes heroin right up to the moment the re-supply is received.

105. On May 6, 2019, at approximately 5:48 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2856 wherein **KHALIF TOOMBS** had a

conversation with **JAMES BLACKWELL**. During the conversation **BLACKWELL** said, “When I get back in the city I'm need to fucking smack my big brother (need one brick of heroin).” **TOOMBS** said, “Alright, its, its either going to be uh Rolex or Fortnite (heroin stamps).” **BLACKWEL** said, “Alright get at, I'll just get me a new watch (Rolex).” **TOOMBS** said, “That's cool.” After **JAMAAL MARSHALL** arrived at 1450 Adams Court with a re-supply of heroin at approximately 5:42 p.m., **TOOMBS** began informing his customers that the re-supply of heroin was stamped “Rolex” or “Fortnite.”

106. On May 6, 2019, at approximately 7:50 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 1292 wherein **KHALIF TOOMBS** had a conversation with **KHALIF DAVIS**. During the conversation **TOOMBS** said, “I know you was asking for that Fortnite (heroin stamp), let your mans, little man know its back.” **DAVIS** said, “Alright got you.” **TOOMBS** said, “Alright you still ain't hear from that little nigga.” **DAVIS** said, “...he text me that's crazy as hell. He text, he text me shit I didn't hit him back though. He was like yo, he was like, 'yo I'm a um give you something (proceeds from the sale of heroin) to take to bro (**TOOMBS**). And it's only going to be a little bit at a time I ran into a jam.' I didn't even text him back though, this nigga ain't, he ain't even have the decency to call me and shit.” **TOOMBS** said, “Yeah exactly.” **DAVIS** said, “Oh yeah, I'm a, I'm call, I'm a call that nigga though, I'm going to reach out to that nigga.” After **MARSHALL** brought **TOOMBS** a re-supply of heroin, including a quantity stamped “Fortnite,” **TOOMBS** informed his distributor, **DAVIS**. They also discussed an individual (“your mans, little man”) that your Affiant believes to be **DAVID RAMIREZ**, and the fact that he owed **DAVIS** money for previously supplied heroin that had been supplied by **TOOMBS**.

107. On May 7, 2019, at approximately 6:26 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 9239<sup>29</sup> wherein **KHALIF TOOMBS** had a conversation with **QUADIR STANLEY**. During the conversation **TOOMBS** said, “I got that Fortnite (heroin stamp) you was asking for.” **STANLEY** said, “Oh yeah?” **TOOMBS** said, “Yeah, that and Rolex (heroin stamp) around.” **STANLEY** said, “Oh, alright.” **TOOMBS** said, “Alright bro. Get with me.” Your Affiant believes that **TOOMBS** was informing **STANLEY** of the heroin stamps he had just acquired.

108. On May 11, 2019, at approximately 5:09 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 6419, wherein **KHALIF TOOMBS** had a conversation with **JEREMY CARLL**. During the conversation, **CARLL** said, “Hey Sim can I get uh one big one (brick of heroin)?” After **TOOMBS** responded “Alright,” **CARLL** asked “when you getting the Apple (heroin stamp) back? She wants to know.” **TOOMBS** said “A week or two,” and **CARLL** said “Okay I’ll let her know.” Based upon information obtained in this investigation, your Affiant believes that **CARLL** ordered one brick of heroin. Further, **CARLL** asked about a popular stamp of heroin, Apple, and implied that he was asking a female who wanted to know. (“she wants to know,” “I’ll tell her”). Your Affiant knows **CARLL** to be in a relationship with **MAYDA HERNANDEZ**, and that they often pick up heroin together or for one another, and others.

109. On May 11, 2019, at approximately 10:13 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2856 wherein **KHALIF TOOMBS** and **JAMAAL MARSHALL**, a/k/a “Freak,” had a conversation with **JAMES BLACKWELL**. During the conversation **BLACKWELL** said, “Alright I just need to talk to my little brother

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<sup>29</sup> The telephone number ending in 9239 is subscribed to “Dashan Johnson” at an address in Philadelphia, Pennsylvania.

twice (two bundles of heroin).” **TOOMBS** said, “Alright I got you...” **BLACKWELL** said, “Um Freak (**MARSHALL**) down there?” **TOOMBS** said, “Yeah.” **BLACKWELL** said, “Alright tell him I need a dizmo (a “dime”, a quantity of cocaine).” **TOOMBS** said to **MARSHALL** in the background, “Freak, you situated (have cocaine)? Hold on.” **MARSHALL**, using Toombs Phone 1, then had a conversation with **BLACKWELL**. **MARSHALL** said, “Yo.” **BLACKWELL** said, “I need a dizmo.” **MARSHALL** said, “Where you at...Alright, come on.”

At approximately 10:23 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2856 wherein **TOOMBS** had another conversation with **BLACKWELL**. During the conversation **BLACKWELL** said, “What am I doing?” **TOOMBS** said, “Mal G (**MARSHALL**) going to give it to you, he going to do everything (provide heroin supplied by **TOOMBS** and cocaine supplied by **MARSHALL**, a/k/a “Freak”) at once.” **BLACKWELL** said, “Alright I'm pulling up now.” After **BLACKWELL** ordered two bundles of heroin from **TOOMBS** (“my little brother twice”), he also ordered a quantity of cocaine (“a dizmo”) from **MARSHALL**. Later, **TOOMBS** informed **BLACKWELL** that **MARSHALL** (“Mal G”), was going to supply the drugs (“he going to do everything at once”). Your Affiant knows that the term “dizmo” is common slang used to refer to a “dime” or the number ten. Your Affiant further believes, based on this and other intercepted communications, that **MARSHALL**, a/k/a “Freak,” a/k/a “Mal G,” as well as **TERRYN KELSEY**, supply cocaine, including to **KHALIF TOOMBS**’s heroin customers.

110. On May 12, 2019, beginning at approximately 9:31 a.m., court authorized interception of communications over Toombs Phone 1 indicated that **KHALIF TOOMBS** was directing **TIEYESHA TUCKER**, using telephone number 0647, to meet with **QUADIR STANLEY**, using telephone number 9283, to conduct a drug transaction at the Adams Court

apartments. **TOOMBS** directed **TUCKER** to supply **STANLEY** with “twenty” bricks of heroin. Further, **STANLEY** had advised **TOOMBS** that he would be arriving via Uber, and **TOOMBS** provided **STANLEY** with the address "1458 north New York". (**STANLEY** was previously identified and determined to have several outstanding New Jersey state warrants not currently known to be associated with this investigation). After **STANLEY** was observed leaving his residence in Atlantic City, New Jersey, in a gray Nissan, at approximately 11:09 a.m., **TUCKER** exited the residence at 1450 Adams Court and walked to New York Avenue. **STANLEY** exited the rear passenger side of the Nissan and met with **TUCKER**. **STANLEY** and **TUCKER** hugged before **STANLEY** returned to the Nissan and **TUCKER** re-entered 1450 Adams Court. As the Nissan departed the area of the Adams Court apartments, it was followed to Virginia Avenue and Mediterranean Avenue. At the direction of case agents, ACPD uniformed patrol officers in a fully marked patrol vehicle conducted a traffic stop on the Nissan at that location. **STANLEY** was identified as the rear seat passenger and he was arrested for the outstanding warrants. A bag containing twenty bricks of suspected heroin stamped “Fortnite” was located and seized from floor of the rear passenger seat where **STANLEY** had been seated. Your Affiant believes **TUCKER** supplied **STANLEY** with the heroin that had been stored in 1450 Adams Court.

111. On May 13, 2019 at approximately 4:42 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 2856 wherein **KHALIF TOOMBS** had a conversation with **JAMES BLACKWELL**. During the conversation **BLACKWELL** said, “Um I just pulled up for work, there is these two white dudes riding around the hood in a black um pickup truck, and they riding slow as hell and there's cop cars riding around here too so be on point (look out for law enforcement).” **TOOMBS** said, “Alright.” **BLACKWELL** said, “It's um

a small not a big black one but a small and shit, alright.” **TOOMBS** said, “Alright.” **BLACKWELL** said, “Alright big. Tell Bus, I called Bus (**TERRY N KELSEY**) looking for you but you called so I flipped over.” **TOOMBS** said, “Alright.” **BLACKWELL** was warning **TOOMBS** about possible law enforcement surveillance in the area (“two white dudes...in a black um pickup truck”), and that **BLACKWELL** had also tried to warn **TOOMBS**’s associate **TERRY N KELSEY**, a/k/a Busta.

112. On May 13, 2019, at approximately 8:29 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation, after **BROWN** ordered “a four piece (four bricks of heroin),” **TOOMBS** directed **BROWN** to drive to the area around 1450 Adams Court to conduct a drug transaction. At approximately 8:45 p.m., **BROWN** arrived in his blue Nissan Sentra and parked on New York Avenue at the Adams Court apartments. **BROWN** was in the driver's seat, and an unidentified female was in the front passenger seat. **TOOMBS** approached the passenger side of the Nissan, and then walked away from the vehicle. The Nissan then departed the area and was followed to the parking lot of 50 Mays Landing Road, Apartment 71. Your Affiant believes that after **TOOMBS** supplied **BROWN** with heroin, **BROWN** returned to his residence at 50 Mays Landing Road, Apartment 71.

113. On May 15, 2019, at approximately 8:34 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647 wherein **KHALIF TOOMBS** had a conversation with **TIEYESHA TUCKER**. During the conversation **TOOMBS** directed **TUCKER** to meet with **JAMES BLACKWELL**, a/k/a “Jimbo,” to conduct a drug transaction. **TOOMBS** said, “Bro you didn't see me FaceTiming you?” **TUCKER** said, “Yeah I about to call you back. I was in the bathroom.” **TOOMBS** said, “Alright go on NY Jimbo (**BLACKWELL**),



a whole 'Fortnite' (brick of heroin stamped "Fortnite"). He there right now." **TUCKER** said, "Alright, you left the closet open, bag on the thing, like come on, you got to clean up. You don't do this stuff (distribute heroin) in your house. You need to clean up." **TOOMBS** said, "If you was doing your job (distributing heroin for **TOOMBS**) then I wouldn't have to be going." **TUCKER** said, "You ain't call me." **TOOMBS** said, "...Alright he (**BLACKWELL**) out there come on, he out there, he out there." **TUCKER** said, "Alright." Your Affiant believes that **TUCKER** was complaining to **TOOMBS** regarding the condition of the storage location for heroin inside her residence at 1450 Adams Court. Further, **TOOMBS** responded that if **TUCKER** had responded to his attempted FaceTime communication, he would not have had to go to 1450 Adams Court ("If you was doing your job then I wouldn't") to obtain the heroin.

114. Beginning on May 15, 2019, intercepted communications over Toombs Phone 1 indicated that **KHALIF TOOMBS** was possibly running low on his supply of heroin.

115. On May 16, 2019, at approximately 5:00 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 1494<sup>30</sup> wherein **KHALIF TOOMBS** had a conversation with **KARON CAREY**. During the conversation **TOOMBS** said, "Who this?" **CAREY** said, "Karon man." **TOOMBS** said, "How you do something to your phone bro?" **CAREY** said, "Man what is wrong with your phone?" **TOOMBS** said, "Yeah you called, uh she (**TIEYESHA TUCKER**) went into the village real quick so I need like ten, fifteen minutes...Is you there (1450 Adams Court) right now?" **CAREY** said, "No I, I, I, I went there and then you didn't answer the phone, and then I left." Surveillance units had observed **CAREY** park in his brown Buick Enclave, bearing New Jersey registration, on New York Avenue by the gate entrance to the Adams Court apartments. **CAREY** departed, and then returned. At approximately

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<sup>30</sup> The telephone number ending in 1494 is subscribed to Karon Carey at an address in Atlantic City, New Jersey.

5:43 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 1494 wherein **TOOMBS** had another conversation with **CAREY**. During the conversation **TOOMBS** said, “Bro it’s your phone bro.” **CAREY** said, “Nah, nothing’s wrong with my phone.” **TOOMBS** said, “I’m calling you right now...turn that shit off and turn it back on.” Your Affiant believes, based on numerous intercepted communications that **TOOMBS** was attempting to communicate with **CAREY** using FaceTime (“I’m calling you right now”), but was having difficulties connecting. Therefore, **TOOMBS** advised **CAREY** to turn his cellular telephone off and then back on, in an effort to fix a problem connecting with FaceTime. At approximately 5:43 p.m., **TIEYESHA TUCKER** was observed exiting 1450 Adams Court, walking to, and entering **CAREY**’s brown Buick. **TUCKER** handed **CAREY** a white object that appeared consistent with the packaging of multiple bricks of heroin. **TUCKER** then exited the Buick and returned to 1450 Adams Court, and **CAREY** departed the area. **CAREY** was observed meeting with **TUCKER** and **WAYNE BURNSIDE** on several occasions, for what your Affiant believes to be narcotics transactions, when there were no intercepted communications arranging the meetings. Your Affiant believes that **TOOMBS** and **CAREY** arrange their heroin transactions primarily using FaceTime.

116. On May 17, 2019, at approximately 3:40 p.m., **JAMAAL MARSHALL** drove his gray Volkswagen Passat to **KHALIF TOOMBS**’s residence at 154 Dunlin Lane. At approximately 3:50 p.m., **MARSHALL** departed **TOOMBS**’s residence driving a rented gray Jeep Grand Cherokee, bearing Pennsylvania license plate KZN-6921<sup>31</sup>. **MARSHALL** was followed as he departed the Atlantic City area and drove to Paterson, New Jersey. **MARSHALL** then drove to the alley behind an apartment building at the intersection of East 38<sup>th</sup> Street and

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<sup>31</sup> Pennsylvania license plate KZN-6921 is registered to EAN Holdings LLC (Enterprise Rent-A-Car). Enterprise confirmed the vehicle was rented to **KHALIF TOOMBS**.

21<sup>st</sup> Avenue (the same location **MARSHALL** was followed to on April 24, 2019, and May 6, 2019). At approximately 6:14 p.m., **MARSHALL** backed the Jeep into the alley, parked, and remained in the vehicle. Approximately two minutes later, **TYJUAN DEMAREST** exited a courtyard opening from the south side of the apartment building into the alley carrying a large cardboard box. **DEMAREST** opened the rear hatch of the Jeep and placed the large box on the right side of the rear compartment. **DEMAREST** then removed a smaller cardboard box from the left side of the rear compartment and returned to the courtyard opening of the building at approximately 6:17 p.m. The rear hatch of the Jeep closed automatically and **MARSHALL** drove out of the area. At approximately 6:18 p.m., **DEMAREST** exited a door on the east side of the apartment building and entered a gray Honda, bearing New Jersey registration, registered to Tyjuan **DEMAREST**, which had been parked at that location. **DEMAREST** then departed the area in the Honda, where surveillance units lost visual contact.

117. On that same day, at approximately 8:35 p.m., the gray Jeep Grand Cherokee parked in the rear parking lot of the Adams Court apartments behind 1450 Adams Court. **MARSHALL** exited the Jeep, retrieved the large cardboard box from the rear compartment, and carried it into the rear sliding glass door of 1450 Adams Court. Your Affiant believes that **MARSHALL** met with **TOOMBS** at **TOOMBS**'s residence at 154 Dunlin Lane and received a quantity of United States currency (stored in the smaller cardboard box), drove to Paterson, New Jersey and provided the payment to **DEMAREST** in exchange for a large quantity of heroin (stored in the large cardboard box). **MARSHALL** then transported the box of heroin directly to **TIEYESHA TUCKER**'s residence at 1450 Adams Court.

118. On May 17, 2019, at approximately 9:05 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 5212 wherein **KHALIF TOOMBS** had a

conversation with **MAYDA HERNANDEZ**. During the conversation **TOOMBS** said “Come on,” and **HERNANDEZ** responded, “Oh alright um, let me tell him. He should, he should be in the city that’s why I was going to tell you to call him.” **TOOMBS** said “One?” and **HERENANDEZ** responded “Yeah, but I think he wants more than one. I think one (brick of heroin) and a couple (bundles of heroin).” Based upon information obtained in this investigation, your Affiant believes that **HERNANDEZ** and **TOOMBS** were discussing an order for a brick of heroin, that **JEREMY CARLL** was going to pick up. (“he should be in the city, that’s why I was going to tell you to call him,” “I think he wants more than one.”) Your Affiant knows **HERNANDEZ** and **CARLL** to be in a relationship and often work together in ordering heroin. Subsequent intercepted communications between **TOOMBS** and **CARLL** confirmed that **CARLL** arrived at the Adams Court apartments and was supplied a quantity of heroin.

119. On May 18, 2019, at approximately 4:57 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 7694, used by **SARAH TALIAFERRO**, which read [I was only able to get out 130 if I can give u the other 5 tomorrow id appreciate it]. Based upon information received in this investigation, your Affiant knows **TALIAFERRO** to often request to be fronted an amount of heroin, despite not having the full purchase amount. (“I can give you the other 5 tomorrow.”) On May 19, 2019, at approximately 11:24 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 7694, used by **TALIAFERRO**, which read, [I’ve got the 5 i owe you too]. Your Affiant believes this message to be in reference to the May 18, 2019 heroin purchase, where she promised to give **TOOMBS** the five dollars she was short the next day.

120. On May 19, 2019, at approximately 1:31 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 7694 wherein **KHALIF TOOMBS** had a

conversation with **SARAH TALIAFERRO**. During the conversation **TALIAFERRO** said, “Um, can I come get three more (bundles of heroin) from you? Sorry, Justin got off early today, I didn’t realize.” **TOOMBS** said, “Alright.” At approximately 1:43 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 7694 wherein **TOOMBS** had another conversation with **TALIAFERRO**. During the conversation **TALIAFERRO** said, “Hi, I’m pullin’ up now.” **TOOMBS** said, “Alright.” Based upon intercepted communications your Affiant is aware that **TALIAFERRO** often met with **TOOMBS** or his distributors multiple times a day, and occasionally picks up heroin to later distribute to another individual (“Sorry, Justin got off early today”).

121. On May 19, 2019, at approximately 9:34 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647 wherein **KHALIF TOOMBS** had a conversation with **TIEYESHA TUCKER**. During the conversation **TOOMBS** said, “Yo, do you got any bread (collected proceeds from the sale of heroin)?” **TUCKER** said, “Yeah I got the um, from Snoopy (heroin distributor), nine-ninety (\$990), right?” **TOOMBS** said, “Yeah, alright, they still in there?” **TUCKER** said, “No, something's wrong with my phone, it's not letting me FaceTime you. It's not letting me FaceTime nobody. It keeps saying failed.” **TOOMBS** said, “...Alright. Bring me the bread (money) to the back door (of 1450 Adams Court).” **TUCKER** said, “I just put that stick in the back door. Wait, I gotta go to my grandmama's house (1449 Adams Court) and get it. I left it over there.” **TOOMBS** said, “Alright, come on. I'm in the parking lot.” Your Affiant believes **TOOMBS** was collecting proceeds (“nine-ninety”) from the sale of previously supplied heroin from **TUCKER**. Further, **TUCKER** informed **TOOMBS** that she had moved the money from where it was stored at 1450

Adams Court to her grandmother's residence, which your Affiant knows to be at 1449 Adams Court.

122. On May 20, 2019, at approximately 10:43 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 8029, used by **VALARIE LAMAR**, that read [What ur flavor]. At approximately 10:44 a.m., an outgoing text message was sent from Toombs Phone 1 to the telephone number ending in 8029 that read [Fresh batch of Apple & Rolex]. At approximately 10:44 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 8029 that read [Ok. Call u soon]. After **LAMAR** sent **KHALIF TOOMBS** a text message asking what heroin stamps ("flavor") he was distributing, **TOOMBS** replied with the names of two heroin stamps ("Apple & Rolex") that had been discussed in numerous intercepted communications, and seized during the investigation. Your Affiant believes that heroin distributors and dealers treat the heroin stamps as brand names, and often want to know the stamp before purchasing the heroin based on the stamp's reputation with heroin users.

123. On May 21, 2019, at approximately 12:04 a.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9283 wherein **KHALIF TOOMBS** had a conversation with **QUADIR STANLEY**. During the conversation **STANLEY** said, "...I'm just trying to get back (after case agents seized **STANLEY**'s twenty bricks of heroin on May 12, 2019)..." **TOOMBS** said, "Everything' everything." **STANLEY** said, "Alright I'm a uh, hit (call) you on Snap." Your Affiant believes that **STANLEY** was telling **TOOMBS** that he would communicate with him on Snapchat ("hit you on Snap"), and that **STANLEY** did this in an effort to avoid electronic surveillance by law enforcement due to his belief that Snapchat communications cannot be intercepted. At approximately 12:19 a.m., an incoming call was

received over Toombs Phone 1 from the telephone number ending in 9283 wherein **TOOMBS** had another conversation with **STANLEY**. During the conversation **TOOMBS** directed **STANLEY** to the area of 2003 Columbia Avenue, Apartment A, Atlantic City, New Jersey. **TOOMBS** said, “You’re in the parking lot right there?” **STANLEY** said, “...nah, yeah, yeah, I’m on the side of it, they, they got mother fucking (security) cameras in there right?” **TOOMBS** said, “Yeah, yeah, don’t go in there...alright, I’m a send him (**WAYNE BURNSIDE**) out, if you can, go closer to the playground.” **TOOMBS** was directing **STANLEY** to a location outside of the view of security cameras in order for him to meet with **BURNSIDE** to obtain a quantity of heroin. Your Affiant believes that in early May 2019, in addition to **TIEYESHA TUCKER**, **TOOMBS** began using **BURNSIDE**, his gray Nissan Pathfinder, and his residence at 2003 Columbia Avenue, Apartment A, to store and distribute heroin, as well as to collect and store the proceeds from the sale of heroin.

124. On May 21, 2019, at approximately 1:09 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 9224 wherein **KHALIF TOOMBS** had a conversation with **PHILIP SURACE**. During the conversation **TOOMBS** said, “I just sent you an address. Pull up over there, in Venice Park.” **SURACE** said, “Can you do four and two (four bricks and two bundles of heroin)?” **TOOMBS** said, “Alright.” At approximately 1:24 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9224 wherein **TOOMBS** had another conversation with **SURACE**. During the conversation **TOOMBS** said, “My man (**WAYNE BURNSIDE**) getting ready to walk up to your car.” At that time, **BURNSIDE** arrived in his gray Nissan Pathfinder and parked in a parking lot in the Venice Park section of Atlantic City in the area of 2003 Columbia Avenue, Apartment A. Approximately one minute later, **SURACE** and **JOSEPH AVERSA** arrived in **AVERSA**’s

previously identified white BMW and parked in the same parking lot. At approximately 1:28 p.m., **BURNSIDE** exited the Nissan and entered the BMW. At approximately 1:29 p.m., **BURNSIDE** exited the BMW and re-entered the Nissan. Both vehicles then departed the area. Your Affiant believes that **BURNSIDE** supplied **SURACE** and **AVERSA** with heroin at the direction of **TOOMBS**.

125. On May 21, 2019, at approximately 2:22 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation **BROWN** said, "Alright get me a two piece (two bricks of heroin) ready." **TOOMBS** said, "Alright. Where you leavin' from out that way (Somers Point)?" **BROWN** said, "Nah I'm in the 'ville (Pleasantville), I'm coming, I just got out of drug court..." **TOOMBS** said, "Alright." **BROWN** said, "Alright, I'll be there in like maybe like five minutes." After **BROWN** ordered two bricks ("two piece") of heroin from **TOOMBS**, he also informed **TOOMBS** that he was coming directly from Drug Court, an intensive court ordered supervision program resulting from a previous drug arrest.

126. On May 24, 2019, at approximately 3:43 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 9283 wherein **KHALIF TOOMBS** had a conversation with **QUADIR STANLEY**. During the conversation **STANLEY** said, "Hey yo uh I need to get with you, your peoples (**WAYNE BURNSIDE**)."  
**TOOMBS** said, "Um what it is (how much heroin)?" **STANLEY** said, "It's gonna be a dub (twenty bricks of heroin)."  
**TOOMBS** said, "Alright just bang (call) me when you're ready." At approximately 7:08 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9283 wherein **TOOMBS** had another conversation **STANLEY**. During the conversation **TOOMBS** said, "You ready? Twenty (bricks of heroin)?" **STANLEY** said, "Yeah." **TOOMBS** said,



“Alright go to the park by the playground.” Your Affiant believes that after **STANLEY** ordered twenty bricks (“a dub,” “twenty”) of heroin from **TOOMBS**, **TOOMBS** directed **STANLEY** to go to Venice Park where **BURNSIDE** was distributing **TOOMBS**’s heroin. On May 25, 2019, ACPD executed a search warrant on an unrelated matter at a residence, 300 Atlantic Avenue, apartment 1703, used by **STANLEY**<sup>32</sup>. Approximately 18 bricks of heroin stamped “Apple,” similar to the stamps purchased in controlled drug buys from **WILBERT TOOMBS** and **DAVID RAMIREZ** were seized from **STANLEY**’s residence.

127. On May 24, 2019, at approximately 8:50 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 1536, a number known to be used by **THOMAS RANDALL**, which read, [Tell brah im by the park.] Based upon information obtained in this investigation, your Affiant believes **RANDALL** was asking **TOOMBS** to inform **BURNSIDE** that he was at the park across from **BURNSIDE**’s house in order to make a heroin transaction (“Tell brah im by the park”).

128. On May 25, 2019, at approximately 9:47 a.m., an outgoing call was made from Toombs Phone 2 to the telephone number ending in 9517<sup>33</sup> wherein **KHALIF TOOMBS**, who was in Atlanta, Georgia at the time, had a conversation with IF-1. During the conversation **TOOMBS** said, “Mal-G (**JAMAAL MARSHALL**) about to bring you something.” IF-1 agreed, and did not question who Mal-G was, or what he was bringing her. Your Affiant believes, based on intercepted communications, that **MARSHALL** distributes heroin and collects proceeds from the sale of heroin at the direction of **TOOMBS**, and that **TOOMBS** was telling IF-1 that

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<sup>32</sup> This was the same address **STANLEY** was located at on May 12, 2019, when he was observed by case agents and arrested for outstanding New Jersey state warrants.

<sup>33</sup> The telephone number ending in 9517 is subscribed to IF-1 at an address in Egg Harbor Township, New Jersey.

**MARSHALL** was going to bring IF-1 the proceeds from the sale of heroin. Your Affiant believes that a portion of those proceeds are stored at **MARSHALL**'s residence at 914 Lexington Place.

129. On May 25, 2019, at approximately 9:51 a.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2840 wherein **KHALIF TOOMBS** had a conversation with **SARAH TALIAFERRO**. During the conversation **TOOMBS** said, "What you need?" **TALIAFERRO** said, "Probably two (bundles of heroin) I have to check my bank..." **TOOMBS** said, "Alright make sure you get enough (money) 'cause I can't, I'm low (heroin supply) right now, I can't to no favors." **TALIAFERRO** said, "Okay no problem, where do you want me to come (to get heroin), to New York (Avenue, by 1450 Adams Court) or?" **TOOMBS** said, "I need to know when you...get the bread...let me know what you do, so I can tell you where to go." Your Affiant believes that **TOOMBS** was going to send **TALIAFERRO** to a location to get heroin based on how much money she had and how much heroin she wanted to purchase. Based on intercepted communications coordinated with surveillance, your Affiant knows that **TOOMBS** stores heroin with **TIEYESHA TUCKER** at 1450 Adams Court, with **WAYNE BURNSIDE** at 2003 Columbia Avenue, Apartment A, with **JAMAAL MARSHALL** at 914 Lexington Place, and with **TERRY N KELSEY** at 17 Brooklyn Avenue. Based on this intercepted communication, and others, your Affiant also believes that **TOOMBS** was low on his supply of heroin at the time of the call.

130. On May 25, 2019, at approximately 4:18 p.m., **JAMAAL MARSHALL** was observed carrying a large cardboard box from New York Avenue through the gate entrance to the Adams Court apartments, and into 1450 Adams Court. At approximately 4:22 p.m., **MARSHALL** exited 1450 Adams Court and walked to New York Avenue. **MARSHALL** was

not carrying the box when he exited the residence. Your Affiant believes that **MARSHALL** travelled to Paterson, New Jersey, obtained a re-supply of heroin in the large cardboard box, and then transported the heroin to 1450 Adams Court. **MARSHALL** was not observed entering or exiting 1450 Adams Court prior to arriving with the large cardboard box. Your Affiant believes that **MARSHALL** obtained **TOOMBS**'s collected proceeds at another location, brought a portion of those proceeds to IF-1 and took another portion to Paterson to acquire the heroin.

131. On that same day, at approximately 6:52 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8263<sup>34</sup> wherein **KHALIF TOOMBS** had a conversation with **WILBERT TOOMBS**. During the conversation **WILBERT TOOMBS** said, "Yo I'm around and you never called me back and let me know when I can come and get these two (bricks of heroin)." **KHALIF TOOMBS** said, "I'm still waiting, let me figure out where they (**JAMAAL MARSHALL**) at, I'll call you back." At approximately 7:31 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8263 wherein **KHALIF TOOMBS** had another conversation with **WILBERT TOOMBS**. During the conversation, after **KHALIF TOOMBS** had directed **WILBERT TOOMBS** to go to New York Avenue by 1450 Adams Court, **WILBERT TOOMBS** said, "You want me to come on the New York Avenue side or the playground?" **KHALIF TOOMBS** said, "Go on the inside, my man Freak (**MARSHALL**)..." Your Affiant believes that **WILBERT TOOMBS** ordered two bricks of heroin ("these two"), **KHALIF TOOMBS** informed him that he had to wait to see if **MARSHALL** had returned from Paterson with the re-supply of heroin ("I'm still waiting"), before ultimately sending **WILBERT TOOMBS** to meet with **MARSHALL** ("my man Freak") to be supplied.

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<sup>34</sup> The telephone number ending in 8263 is subscribed to "Wilbert Wilb" at an address located in Atlantic City, New Jersey.

132. On May 25, 2019, at approximately 9:51 a.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2840 wherein **KHALIF TOOMBS** had a conversation with **SARAH TALIAFERRO**. During the conversation **TALIAFERRO** said “Hey, I’m here. Should I move somewhere else? There’s hella people over here.” **TOOMBS** said “You said a lot of people right there?” and **TALIAFERRO** responded “Yeah, like they’re all like sitting outside and sitting in their cars.” **TOOMBS** said “Alright. Pull, uh, go back out.” Based upon information obtained in the investigation, your Affiant believes that **TALIAFERRO** was informing **TOOMBS** that there were many people around, who might observe the heroin transaction she was there to conduct (“Should I move somewhere else? There’s hella people over here”). Your Affiant believes the purpose of informing **TOOMBS** was to avoid detection.

133. On May 26, 2019, at approximately 5:17 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **KHALIF TOOMBS** had a conversation with **DEAN JOHNSON**. During the conversation **JOHNSON** said, “...you can get next to him (**TERRY KELSEY**), for me? Little bro, he ain’t answering me and shit, he just shot me the number, he said you said it was okay.” **TOOMBS** said, “...he (**KELSEY**) next to me, he just landed too.” Your Affiant knows that **TOOMBS** and **KELSEY** had just landed on a flight from Atlanta, Georgia back to Atlantic City, New Jersey. **JOHNSON** said, “...whenever he can, I need him (to supply cocaine).” **TOOMBS** said, “Alright, anything my way (heroin)?” **JOHNSON** said, “Nah, I just got (just acquired heroin), I mean I can if you want me to but I just got last night and shit.” Your Affiant knows that **JOHNSON** met with **WAYNE BURNSIDE** on May 25, 2019, to be supplied with heroin. **TOOMBS** said, “No, okay, um.” **JOHNSON** said, “I mean to make it, to make it one move I can grab something.” **TOOMBS** said, “...he (**KELSEY**) said he going to call you as soon as everything’ everything.” Your Affiant believes that

**JOHNSON** called **TOOMBS** in order to see if **TOOMBS** could direct **KELSEY** to sell **JOHNSON** cocaine (“get next to him, for me...you said it was okay”), and **TOOMBS** informed **JOHNSON** that **KELSEY** would call him when he was ready to supply cocaine (“he going to call you as soon as everything’ everything”). Your Affiant believes that **KELSEY** distributes cocaine, including to **TOOMBS**’s heroin customers, and that **KELSEY** stores the cocaine at his residence at 17 Brooklyn Avenue.

134. On May 28, 2019, at approximately 11:27 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9283 wherein **KHALIF TOOMBS** had a conversation with **QUADIR STANLEY**. During the conversation **STANLEY** said, “...your peoples (heroin distributors) around...I’ just trying to get two (bricks of heroin).” **TOOMBS** said, “Alright you probably shoot out the park (Venice Park)...let me set that up for you.” At approximately 12:09 a.m., **STANLEY** was observed entering the passenger side front door of **WAYNE BURNSIDE**’s gray Nissan Pathfinder that was parked near 2003 Columbia Avenue, Apartment A. **STANLEY** then exited the Nissan and departed the area. Your Affiant believes that **BURNSIDE** supplied **STANLEY** with heroin at the direction of **TOOMBS**.

135. On May 29, 2019, at approximately 1:28 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 1536<sup>35</sup> wherein **KHALIF TOOMBS** had a conversation with **THOMAS RANDALL**. During the conversation **RANDALL** said, “Hey bro tell him (**WAYNE BURNSIDE**) I’m here.” **TOOMBS** said, “Alright.” In this and other intercepted communications, **TOOMBS** was directing his heroin customers to the Venice Park section of Atlantic City to the area around **BURNSIDE**’s residence. In a subsequent intercepted conversation, **RANDALL** told **TOOMBS** to tell **BURNSIDE** that he (**RANDALL**) was driving

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<sup>35</sup> The telephone number ending in 1536 has no subscriber information available from the service provider.

a green van. At approximately 1:28 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 1536 wherein **TOOMBS** had another conversation with **RANDALL**. During the conversation **TOOMBS** explained that **BURNSIDE** did not have change for the payment that **RANDALL** had provided for the heroin. **TOOMBS** said, "Alright, I'll take it (the amount owed to **RANDALL**) off the next one (heroin sale)." **RANDALL** said, "Alright cool." **TOOMBS** was telling **RANDALL** that he would reduce the amount of payment for a future heroin transaction by the amount of change owed to **RANDALL** from the current transaction. As telephone number 1536 had only been intercepted on one previous occasion, wherein **RANDALL** had also referenced meeting **BURNSIDE** near **BURNSIDE**'s residence, case agents directed ACPD uniformed patrol officers to conduct a traffic stop of **RANDALL**'s observed green Nissan van bearing New Jersey registration. **RANDALL** was confirmed as an occupant of the vehicle, and he was released from the scene.

136. On May 29, 2019, at approximately 9:37 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 0647 wherein **KHALIF TOOMBS** had a conversation with **TIEYESHA TUCKER**. During the conversation **TOOMBS** said, "You don't see me calling you?" **TUCKER** said, "My phone just cut on." **TOOMBS** said, "Alright uh, my man (**KARON CAREY**) might need ten (bricks of heroin)." **TUCKER** said, "Who?" **TOOMBS** said, "Brown truck." **TUCKER** said, "The brown Buick?" **TOOMBS** said, "Yeah." Your Affiant believes that **TOOMBS** was telling **TUCKER** that **KARON CAREY**, who has been observed by surveillance units meeting with **TUCKER** in a brown Buick, was coming to be supplied with ten bricks of heroin. Your Affiant also believes, based this and other intercepted communications, that **TOOMBS** and **CAREY** communicate using FaceTime, as there were no intercepted communications prior to this call between **TOOMBS** and **CAREY**.

137. On May 30, 2019, at approximately 4:42 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 5212 wherein **KHALIF TOOMBS** had a conversation with **MAYDA HERNANDEZ**. During the conversation **HERNANDEZ** said, "...can I come get a big one (brick of heroin)?" **TOOMBS** said, "Yeah, where you at?" **HERNANDEZ** said, "...I'm leaving from my house now. Where you want me to go at?" **TOOMBS** said, "New York (avenue)." Your Affiant believes that after **HERNANDEZ** ordered a brick of heroin ("a big one") **TOOMBS** directed her to New York Avenue, where 1450 Adams Court is located, where **TOOMBS** stores and distributes heroin.

138. On May 30, 2019, at approximately 5:06 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 6419 wherein **KHALIF TOOMBS** had a conversation with **JEREMY CARLL**. During the conversation **CARLL** said, "...I need three little ones (three bundles of heroin), you got an Apple (heroin stamp) left?" **TOOMBS** said, "Nah, ain't no Apple for a while." **CARLL** said, "Where you want me to go?" **TOOMBS** said, "New York (avenue)." Your Affiant believes that after **CARLL** ordered three bundles of heroin ("three little"), **TOOMBS** directed him to New York Avenue, where 1450 Adams Court is located, where **TOOMBS** stores and distributes heroin.

139. On May 31, 2019, at approximately 3:41 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 1536 wherein **KHALIF TOOMBS** had a conversation with **THOMAS RANDALL**. During the conversation **RANDALL** said, "...everything' everything?" **TOOMBS** said, "Yeah." **RANDALL** said, "Alright, three of them joints (bricks of heroin)." **TOOMBS** said, "Alright, you probably got to go to the park (**WAYNE BURNSIDE**'s residence in Venice Park). Let me call and definitely confirm." **RANDALL** said, "Alright hey yo, it no way I could, that nigga (**BURNSIDE**) could meet me,

'cause last time I went out there bro I got pulled (pulled over by police) on the way back.” **TOOMBS** said, “Nah, he ain't got no G-ride (**BURNSIDE** does not have a vehicle).” **RANDALL** said, “Damn alright, fuck it, yeah. I'm about to, I'll just pull up on him then fuck it.” After **RANDALL** ordered three bricks of heroin (“three of them joints”), **TOOMBS** directed him to meet with **BURNSIDE** in Venice Park. **RANDALL** then asked if **BURNSIDE** could meet him (**RANDALL**) at another location, as **RANDALL** was pulled (“I got pulled”) over by the police the last time he met with **BURNSIDE** to be supplied with heroin.

140. On June 1, 2019, at approximately 12:03 p.m., a call was intercepted over Toombs Phone 1 from the telephone number ending in 5212 wherein **KHALIF TOOMBS** had a conversation with **MAYDA HERNANDEZ**. During the conversation **TOOMBS** said “Are you coming there now?” And **HERNANDEZ** responded, “No, my boyfriend is. He over there.” At 12:04 p.m. an incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419, used by **JEREMY CARLL**, that read [where do you want me to go] and **TOOMBS** responded [Venice park]. Based upon information obtained in this investigation, your Affiant believes that **HERNANDEZ** and **TOOMBS** previously discussed the sale of heroin and that **JEREMY CARLL** (“my boyfriend” “he over there”) picked up **HERNANDEZ**'s order.

141. On June 1, 2019, at approximately 8:23 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419, used by **JEREMY CARLL**, that read [U around need 1 big]. After a reply text message from **KHALIF TOOMBS** confirmed he would be available to supply the heroin. At approximately 8:24 p.m., another incoming text message was received over Toombs Phone 1 from the telephone number ending in 609-795-6419 that read [Okay text me the address cuz the dude said to go to a different address



next time]. At approximately 8:49 p.m., another incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419 that read [I'm here I'm parked on the corner of Columbia and Sheridan it's hard to see the number sin night time he usually makes me park in the lot cross from the courts]. At approximately 8:50 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 6419 wherein **TOOMBS** had a conversation with **CARLL**. During the conversation **TOOMBS** said, "You right there on Columbia and Sheridan, like parked by the trashcan?" **CARLL** said, "Yeah there's a dumpster in the parking lot next to me and on the other side of the street is like a brick building." **TOOMBS** then confirmed that **CARLL** that he was in the right place. Your Affiant believes that after **CARLL** ordered a brick of heroin ("need 1 big"), **TOOMBS** directed him to the parking lot of 2003 Columbia Avenue, Apartment A, where **WAYNE BURNSIDE** would supply heroin to **CARLL**.

142. On June 4, 2019, at approximately 8:45 a.m., **KHALIF TOOMBS**'s gray Jeep Grand Cherokee was parked in an unassigned parking space at the west end of Dunlin Lane, while **TOOMBS**'s driveway at 154 Dunlin Lane was vacant. At approximately 9:55 a.m., **JAMAAL MARSHALL**'s gray Volkswagen Passat parked in the driveway of **TOOMBS**'s residence 154 Dunlin Lane. Several minutes later, the Jeep was no longer parked at the end of Dunlin Lane. At approximately 11:31 a.m., the Jeep was observed backing into the alley south of the apartment building at the corner of East 38<sup>th</sup> Street and 21<sup>st</sup> Avenue in Paterson, New Jersey. At approximately 11:33 a.m., the Jeep departed the alley. At approximately 11:34 a.m., **TYJUAN DEMAREST** walked from main door on the east side of the apartment building to his gray Audi A6 parked at that location. **DEMAREST** placed a long flat brown cardboard box in the trunk of the Audi. **DEMAREST** departed the area in the Audi, and was followed to the

Santander Bank at 35 South Main Street, Lodi, New Jersey. **DEMAREST** retrieved the box from the trunk of the Audi and entered the bank. At approximately 12:00 p.m., **DEMAREST** exited the bank and returned to the Audi. **DEMAREST** was not carrying the box when he exited the bank. Your Affiant believes **MARSHALL** obtained proceeds from the sale of heroin from **TOOMBS** at 154 Dunlin Lane, and then traveled to Paterson, New Jersey and exchanged the proceeds for a large quantity of heroin that was supplied by **DEMAREST**. Further, your Affiant believes that **DEMAREST** took those proceeds to the Santander Bank in the trunk of his Audi, and deposited said proceeds in an account with Santander Bank. .

143. On that same day, at approximately 12:54 p.m., **JAMAAL MARSHALL**'s gray Volkswagen Passat and **KHALIF TOOMBS**'s gray Jeep Grand Cherokee arrived at the parking lot of 2003 Columbia Avenue, Apartment A. Your Affiant believes that after acquiring a supply of heroin from **TYJUAN DEMAREST** in Paterson, New Jersey, **JAMAAL MARSHALL** delivered the heroin to 2003 Columbia Avenue, Apartment A.

144. On June 4, 2019, at approximately 7:44 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 2840 wherein **KHALIF TOOMBS** had a conversation with **SARAH TALIAFERRO**. During the conversation **TOOMBS** said "What you need?" and **TALIAFERRO** responded "Three." **TOOMBS** then told her to go to Venice Park. **TALIAFERRO** said "I'm sending Justin. He's going to leave in ten minutes." **TOOMBS** said "He know where to go?" and **TALIAFERRO** responded "Yeah, he knows where to go and the dude (**BURNSIDE**) has met him before." Based upon information obtained in this investigation, your Affiant believes that **TALIAFERRO** ordered three bundles of heroin and sent her boyfriend to pick it up. ("Three," "I'm sending Justin.") Further, based upon this

conversation and others intercepted, your Affiant is aware that “Justin” and **TALIAFERRO** often work together to purchase heroin, and then distribute to one another.

145. On June 5, 2019, at approximately 12:14 a.m., an outgoing text message was sent from Toombs Phone 1 to the telephone number ending in 6419, used by **JEREMY CARLL**, that read [Apple back]. At approximately 12:15 a.m., an outgoing text message was sent from Toombs Phone 1 to the telephone number ending in 5212, used by **MAYDA HERNANDEZ**, that read [Apple back]. Your Affiant believes that after **JAMAAL MARSHALL** returned from Paterson, New Jersey on June 4, 2019 with a re-supply of heroin, **KHALIF TOOMBS** was sending text messages to his heroin customers to inform them that he again had the popular “Apple” stamp available.

146. On June 5, 2019, at approximately 5:11 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 6419, used by **JEREMY CARLL**, that read [She said the guy owe her \$10 so I will give him 80 the three okay. I’ll be in Venice in 5 minutes]. Based upon this and other intercepted communications, your Affiant knows that **CARLL** and **MAYDA HERNANDEZ** work together to obtain heroin and then distribute to one another. As intercepted in this text message, your Affiant believes that **HERNANDEZ** was owed ten dollars from a previous purchase, so **CARLL** was informing **TOOMBS** he was going to pay ten dollars less on this purchase of three bundles (“She said the guy owe her \$10 so I will give him 80 the three”).

147. On June 5, 2019, at approximately 5:18 p.m., an incoming call was received over Toombs Phone 2 from the telephone number ending in 5763<sup>36</sup> wherein **KHALIF TOOMBS** had a conversation with IF-6. During the conversation IF-6 said, “Uh, Luck (**TYJUAN**

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<sup>36</sup> The telephone number ending in 5763 is subscribed to IF-6 at an address in Pleasantville, New Jersey.

**DEMAREST**) just called me and said to tell you to get a new (telephone) number and then hit (call) him...I'm not sure what that meant.” **TOOMBS** said, “Said tell me get a new number?” IF-6 said, “Yeah, I'm like what, he's like ‘Tell Lif get a new number and hit me’...From the new number.” **TOOMBS** said, “What, what number he call you from? Well just...” IF-6 said, “I'm guessing he got a new number two, one, seven, two, two, oh (2-1-7-2-2-0).” **TOOMBS** interrupted, “Hold on...is it an iPhone?...he called you regular?...DM (Direct Message) it to me on Snap (Snapchat)...just DM it to me. Let me see what he’ talking about because I don't know what he's talking about. Alright?” Your Affiant believes that **DEMAREST**, a/k/a “Luck,” was attempting to conceal his drug trafficking activities and thwart law enforcement attempts at electronic surveillance by changing telephone numbers, and by calling IF-6 rather than calling **TOOMBS** with the new telephone number. **TOOMBS** also attempted to compartmentalize and conceal the information by instructing IF-6 to send him **DEMAREST**’s new telephone number via Snapchat rather than just telling him the phone number. At approximately 5:53 p.m., and outgoing call was attempted, but not answered, on Toombs Phone 1 to the telephone number 217-220-7185.<sup>37</sup>

148. On June 6, 2019, beginning at approximately 12:53 p.m., and ending at 11:47 p.m., a series of calls were intercepted between Toombs Phone 1 and telephone number ending in 9224 wherein **KHALIF TOOMBS** arranged for **WAYNE BURNSIDE** to meet with **PHILIP SURACE** throughout the day and supply him with heroin. At approximately 4:56 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9224 wherein **KHALIF TOOMBS** had a conversation with **PHILIP SURACE**. During the conversation **SURACE** said, “I'm already at eight (sold bricks of heroin) today, so you know.”

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<sup>37</sup> Telephone number 217-220-7185 has no subscriber information available from the service provider.

**TOOMBS** said, “No you're not, you're not.” **SURACE** said, “Yes I am!” **TOOMBS** said, “You're not counting Joe (**JOSEPH AVERSA**), not counting Joe. You're at three (bricks of heroin).” **SURACE** said, “Alright, well at. No this will be four (bricks of heroin) bro.” Your Affiant believes that **SURACE** was telling **TOOMBS** that he had sold eight bricks (“eight today”) of heroin on this day. Further, **TOOMBS** told **SURACE** that he (**SURACE**) had only sold three bricks, due to the fact that **AVERSA** distributes half of the heroin that **TOOMBS** supplies to **SURACE**, and **SURACE** agreed (“Alright...four”).

149. On June 6, 2019, at approximately 6:14 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 7694, wherein **KHALIF TOOMBS** had a conversation with **SARAH TALIAFERRO**. During the conversation, **TOOMBS** learned it was **TALIAFERRO**'s boyfriend's birthday. **TOOMBS** told **TALIAFERRO** “I'm going to give you an extra one. You better make sure y'all split it too. Make sure you split it with him, tell him it's from me.” Based upon this conversation your Affiant believes that **TOOMBS** was giving **TALIAFERRO** a bundle of heroin for free, for her to give to her boyfriend for his birthday (“I'm going to give you an extra one” “Make sure you split it with him”).

150. On June 7, 2019, at approximately 9:13 a.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 8029, used by **VALARIE LAMAR**, that read [Need 2 c u. Call when I get from store. 5]. **LAMAR** then sent another text message that read [What flavors]. At approximately 9:49 a.m., an outgoing text message was sent from Toombs Phone 1 to the telephone number ending in 8029 that read [Apple]. At approximately 10:03 a.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8029 wherein **KHALIF TOOMBS** had a conversation with **LAMAR**. During the conversation **TOOMBS** said, “Yeah, can you get to Venice Park?” **LAMAR** said, “What

they (**WAYNE BURNSIDE**) going to come meet me at the playground?” **TOOMBS** said, “...I’m a see if they (**BURNSIDE**) can come to you, I’ll call you right back. What you want five (bricks of heroin)?” **LAMAR** said, “Yeah.” **TOOMBS** said, “Call you right back, answer your phone.” At approximately 10:06 a.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8029 wherein **TOOMBS** had another conversation with **LAMAR**. During the conversation **TOOMBS** said, “My people's (**BURNSIDE**) going to pull up on you on a gray truck (Nissan Pathfinder) in like ten, twelve minutes.” **LAMAR** said, “Yeah but I got to run upstairs and go get the money.” **TOOMBS** said, “Go do that now.” At approximately 10:15 a.m., **BURNSIDE** was observed exiting his residence at 2003 Columbia Avenue, Apartment A, and entering his previously identified gray Nissan Pathfinder. At approximately 10:25 a.m., **BURNSIDE** arrived in the Nissan at the High Gate apartments at 655 Absecon Boulevard. **LAMAR** then arrived at the High Gate apartments in her black Saturn, bearing New Jersey registration. **LAMAR** exited the Saturn and entered the front passenger door of **BURNSIDE**’s Nissan. Approximately two minutes later, **LAMAR** exited the Nissan and returned to the Saturn.

151. On June 9, 2019, at approximately 2:03 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation **BROWN** said, “Man I need four of them shits (bricks of heroin).” **TOOMBS** said, “Go to the park (Venice Park).” At approximately 2:31 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **TOOMBS** has another conversation with **BROWN**. During the conversation **BROWN** said, “Tell him (**WAYNE BURNSIDE**) I here. I’m sitting on the basketball court.” **TOOMBS** said, “Alright, he’ coming.” At approximately 2:34 p.m., **BURNSIDE** exited 2003 Columbia Avenue, Apartment A, walked towards the basketball courts

across the street and met with **BROWN** who was waiting on the bleachers. At approximately 2:37 p.m., **BURNSIDE** returned to and entered Apartment A. After **BROWN** ordered four bricks (“four of them shits”) of heroin, **TOOMBS** directed him the area around 2003 Columbia Avenue, Apartment A which is in the Venice Park section of Atlantic City (“go to the park”). **BURNSIDE** then met with **BROWN** and supplied him with heroin that had been stored in his residence. Further, your Affiant believes that **BURNSIDE** collected payment from **BROWN** and stored them inside his residence at 2003 Columbia Avenue, Apartment A.

152. On that same day, at approximately 2:05 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 5212 wherein **KHALIF TOOMBS** had a conversation with **MAYDA HERNANDEZ**. During the conversation **HERNANDEZ** said, “Hey sweetie, can I get two big ones (bricks of heroin)?” **TOOMBS** said, “Alright, go to the park, Venice.” At approximately 2:12 p.m., an incoming text message was received over Toombs Phone 1 from the telephone number ending in 5212 that read [I’m here]. Your Affiant believes that after **HERNANDEZ** ordered two bricks of heroin (“two big ones”), **TOOMBS** directed her to the area around 2003 Columbia Avenue, Apartment A (“the park, Venice”) to meet with **WAYNE BURNSIDE** who would supply the heroin as well as collect the payment.

153. On that same day, at approximately 5:13 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **KHALIF TOOMBS** had a conversation with **DEAN JOHNSON**. During the conversation **JOHNSON** said, “...just need to get next to you...Jason Kidd (five bricks of heroin).” **TOOMBS** and **JOHNSON** then agreed on a location where **BURNSIDE** would meet with **JOHNSON** and supply the heroin. Your Affiant knows, based on intercepted communications that **JOHNSON** and **TOOMBS** use the name “Jason Kidd” to refer to the number “5” jersey that Kidd wore while he played professional

basketball for the New Jersey Nets. At approximately 5:23 p.m., **BURNSIDE** exited 2003 Columbia Avenue, Apartment A, entered his gray Nissan Pathfinder, and departed the area. At approximately 5:28 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **TOOMBS** had another conversation with **JOHNSON**. During the conversation **TOOMBS** said, "Alright, he (**BURNSIDE**) about to pull up to the shop." At approximately 5:35 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9066 wherein **TOOMBS** had another conversation with **JOHNSON**. During the conversation **TOOMBS** said, "He in a gray truck (Nissan)." Your Affiant believes **BURNSIDE** supplied **JOHNSON** with five bricks of heroin that had been stored at 2003 Columbia Avenue, Apartment A, and transported in his Nissan.

154. On that same day, at approximately 5:38 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 9224 wherein **KHALIF TOOMBS** had a conversation with **PHILIP SURACE**. During the conversation **SURACE** said, "Alright two-forty (\$240), that's there, um I got a trap (heroin sale) right now...for the bread (money) for two more (bricks of heroin). So, with them two, plus another two." **TOOMBS** said, "You need four (bricks of heroin)...alright go to the spot (2003 Columbia Avenue, Apartment A) in like ten minutes." At approximately 5:44 p.m., an outgoing call was made from Toombs Phone 1 to the telephone number ending in 9224 wherein **TOOMBS** had another conversation with **PHILIP SURACE**. During the conversation **TOOMBS** said, "He (**WAYNE BURNSIDE**) about to be ready for you." **SURACE** said, "Alright well um, I'm here." At approximately 5:45 p.m., **SURACE** arrived in his white Hyundai Elantra bearing Texas registration and parked on Columbia Avenue near 2003 Columbia Avenue, Apartment A. A short while later, the Elantra drove north on Columbia Avenue and out of view of surveillance. At approximately 5:59 p.m.,



**BURNSIDE** arrived in his gray Nissan Pathfinder, parked in front of 2003 Columbia Avenue, Apartment A, and entered the residence. At approximately 6:02 p.m., **BURNSIDE** exited the residence, entered the Nissan and departed the area. Your Affiant believes that at the direction of **TOOMBS**, **BURNSIDE** met with **SURACE** and supplied him with a quantity of heroin that had been stored in 2003 Columbia Avenue, Apartment A, and delivered in **BURNSIDE**'s Nissan.

155. On that same day, at approximately 8:03 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **KHALIF TOOMBS** had a conversation with **NASIR BROWN**. During the conversation **BROWN** said, "Yo, I'm out here." **TOOMBS** said, "Alright, you said three (bricks of heroin) right?" At approximately 8:15 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159 wherein **TOOMBS** had another conversation with **BROWN**. During the conversation **TOOMBS** said, "He (**WAYNE BURNSIDE**) never came out (of 2003 Columbia Avenue, Apartment A)?" **BROWN** said, "I said hell no nigga, I'm at the basketball court." At approximately 8:19 p.m., **BURNSIDE** arrived at the parking lot of 2003 Columbia Avenue, Apartment A in his gray Nissan Pathfinder. At that same time, an outgoing call was made from Toombs Phone 1 to the telephone number ending in 5379<sup>38</sup> wherein **TOOMBS** had a conversation with **BURNSIDE**. During the conversation **TOOMBS** said, "Yo where you at?" **BURNSIDE** said, "I'm right here at the joint...blue Nissan (**NASIR BROWN**'s blue Nissan Sentra) out here." **TOOMBS** said, "...I was FaceTime'ing you and shit, he need uh, three (bricks of heroin)." **BURNSIDE** said, "Need three? Alright I'm right here in the parking lot (2003 Columbia Avenue, Apartment A), I was around the corner." At approximately 8:23 p.m., an incoming call was received over Toombs Phone 1 from the telephone number ending in 8159

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<sup>38</sup> The telephone number ending in 5379 is subscribed to "Zoretta Johnson," at an address in Laurel, Maryland.

wherein **TOOMBS** had another conversation with **BROWN**. During the conversation **TOOMBS** said, “He’s (**BURNSIDE**) coming right now.” At approximately 8:23 p.m., **BURNSIDE** walked to the passenger side of the gray Nissan Pathfinder, opened the front door, and retrieved a white bag. **BURNSIDE** then walked towards the basketball court. Your Affiant believes that **BURNSIDE** supplied **BROWN** with three bricks of heroin that had been stored in the gray Nissan Pathfinder. At approximately 8:28 p.m., **BURNSIDE** returned to 2003 Columbia Avenue, Apartment A as an incoming call was received over Toombs Phone 1 from the telephone number ending in 5379 wherein **TOOMBS** had another conversation with **BURNSIDE**. During the conversation **BURNSIDE** said, “Yo why the FaceTime not going through?” **TOOMBS** said, “I don’t know what’s up with your shit (cellphone). I’m hitting (calling) you...you see him (**BROWN**)?” **BURNSIDE** said, “Yeah I seen him, I been seen him (supplied with heroin), when I got off the phone with you.” Your Affiant believes that **BURNSIDE** was confirming to **TOOMBS** that he had supplied **BROWN** (“I seen him”) with heroin.

156. On June 17, 2019, surveillance units observed **KHALIF TOOMBS** driving a black Volkswagen Passat bearing New Jersey license plate J27-JYK<sup>39</sup> from the Budget Rent-A-Car facility at the Atlantic City Airport.

157. On June 18, 2019, at approximately 11:30 a.m., **KHALIF TOOMBS**’s rented black Volkswagen Passat was observed parked at his residence at 154 Dunlin Lane, Egg Harbor Township, New Jersey. At approximately 11:40 a.m., **MARSHALL** exited his residence at 914 Lexington Place, wearing a light blue basketball jersey and blue jeans, and entered his gray Volkswagen Passat, and departed the area. At approximately 12:09 p.m. **MARSHALL**’s gray

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<sup>39</sup> New Jersey license plate J27-JYK is registered to a black 2018 Volkswagen Passat, to PV Holding Corp (Budget Rent-A-Car).

Volkswagen Passat was observed parked in the driveway of 154 Dunlin Lane. **MARSHALL** exited 154 Dunlin Lane, entered **TOOMBS**'s rented black Volkswagen Passat and departed the area. At approximately 12:44 p.m., **TOOMBS** exited 154 Dunlin Lane, entered **MARSHALL**'s gray Volkswagen Passat, and departed the area.

158. At approximately 12:51 p.m., **JAMAAL MARSHALL** arrived at 914 Lexington Place, parked the black Volkswagen Passat, and entered the residence. At approximately 12:52 p.m., **JAMES BLACKWELL**'s green Subaru bearing New Jersey registration was observed parked behind the black Volkswagen Passat. At approximately 12:53 p.m., **MARSHALL** exited 914 Lexington Place and reached into front passenger side window of the Subaru handing an object to the occupant. The Subaru then departed the area. **MARSHALL** then re-entered his residence, and immediately exited again. **MARSHALL** entered the black Volkswagen Passat and at approximately 12:56 p.m., departed the area.

159. At approximately 2:18 p.m., **JAMAAL MARSHALL** was observed driving the black Volkswagen Passat northbound on the Garden State Parkway at mile marker 113. At approximately 3:00 p.m., **MARSHALL** exited the Garden State Parkway at exit 156. At approximately 3:03 p.m., **MARSHALL** arrived on Market Street in Paterson, New Jersey, where surveillance units lost visual contact with the black Volkswagen Passat. At approximately 3:15 p.m., **MARSHALL** was observed entering the Garden State Parkway southbound from Lexington Avenue in Paterson, New Jersey.

160. Based on the observations of **JAMAAL MARSHALL**'s movements this day matching the pattern of similar actions observed on April 24, 2019, May 6, 2019, May 17, 2019, May 25, 2019, and June 4, 2019, including leaving his residence at 914 Lexington Place, driving his vehicle to **KHALIF TOOMBS**'s residence at 154 Dunlin Lane, leaving **TOOMBS**'s

residence driving **TOOMBS's** rental vehicle, returning to his residence at 914 Lexington Place, driving northbound on the Garden State Parkway to exit 156 in Paterson, New Jersey, and on occasions being observed exchanging boxes with **TYJUAN DEMAREST**, departing Paterson within a short period of time and returning southbound on the Garden State Parkway, to later be observed moving large boxes from the rental vehicles into residences used by **TOOMBS** to store and distribute heroin, your Affiant directed marked patrol units of the New Jersey State Police ("NJSP") to conduct a motor vehicle stop of **MARSHALL** in the black Volkswagen Passat at mile marker 153.5. NJSP independently discovered that the black Volkswagen Passat had an expired registration. Upon approaching the vehicle, **MARSHALL** was asked for consent to search the vehicle; he declined. FBI Special Agent Natalie Bara and her K9 partner Dixie responded to the scene at the request of NJSP. Dixie conducted a sniff of the exterior of the black Volkswagen Passat and gave a positive indication to the presence of the odor of narcotics. NJSP took possession of the black Volkswagen Passat and it was towed to a secured facility. **MARSHALL** was transported to the Bloomfield NJSP Barracks and was released.

161. On June 19, 2019, at approximately 12:10 a.m., an incoming call was received over Toombs Phone 2 from a New Jersey State Prison wherein **KHALIF TOOMBS** had a conversation with IM-1, and inmate at the facility. During the conversation **TOOMBS** said, "Freck (IM-1's girlfriend) ain't tell you what happened?" Freck ain't tell you what happened?" IM-1 said, "What happened?" **TOOMBS** said, "He (**JAMAAL MARSHALL**) ain't make it back bro...Might be done. I might be done up bro." IM-1 said, "Get the fuck out of here bro!" **TOOMBS** said, "The G-Ride was in my name." IM-1 said, "Oh my God bro, this is serious man...Oh my God bro, all the way up that way (Paterson, New Jersey)?" **TOOMBS** said, "Yeah." IM-1 said, "Oh my God bro. Person's (**MARSHALL**) still up there too right?"

**TOOMBS** said, “Nah...It's complicated bro, I can't talk about it bro...I know they (law enforcement) gonna come grab me. I know that.” Your Affiant believes **TOOMBS** was telling IM-1 that **MARSHALL** did not come back (“he ain’t make it back”) from his trip to Paterson to acquire a re-supply of heroin. **TOOMBS** also surmised that as a result, law enforcement was going to come arrest **TOOMBS** (“I might be done,” “they gonna come grab me”). At the time of this call, **TOOMBS**’s rented black Volkswagen that **MARSHALL** had been driving, had not been searched. Your Affiant believes that **TOOMBS** believed law enforcement would discover a large amount of heroin in the vehicle.

162. On June 21, 2019, the Honorable Karen M. Williams, United States Magistrate Judge, authorized a search warrant to search the contents of the black Volkswagen Passat. On June 21, 2019, the FBI took custody of the Passat and at approximately 5:18 p.m., federal law enforcement officers searched the vehicle. Law enforcement found, in the trunk of the vehicle, a large cardboard box, similar in size and shape to the cardboard boxes previously obtained by **MARSHALL** from **DEMAREST**. Inside the cardboard box, law enforcement found 900 bricks of heroin stamped “Apple.” The bricks were wrapped in white paper and separated into blocks containing 25 bricks per block, with each block wrapped in green cellophane. Each block was marked with the letter “A,” corresponding to the Apple stamp. This packaging and markings are consistent with packaging and markings seized and purchased throughout the investigation, including the 66 bricks of heroin seized from **KHALIF TOOMBS** in February of 2018.

163. Through the course of this investigation, law enforcement has seized heroin from transactions conducted by CHSs, seized heroin from arrested co-conspirators, as well as from search warrants of residences associated with those arrests, monitored all intercepted communications regarding the amounts of heroin being sold, and retrieved a resupply of heroin

as a result of the June 21, 2019 search warrant. As a result, law enforcement has concluded that, in total, the members of the conspiracy did distribute and possess with intent to distribute more than one kilogram of heroin.

#### **IV. CONCLUSION**

164. Wherefore, your Affiant submits that there is probable cause to believe that the members of the conspiracy described above, from in or about April 2017 and continuing through in or about June 2019, in Atlantic County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and to possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846.