
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	SUPERSEDING
v.	:	CRIMINAL COMPLAINT
	:	
LEON CLARK,	:	Honorable Leda Dunn Wettre
a/k/a "Dino,"	:	
ABDUL PRICE,	:	Mag. No. 21-13448
a/k/a "Ab,"	:	
a/k/a "Dred,"	:	
ELJAWAN WHITE,	:	
a/k/a "Eli,"	:	
JANICE ANDERSON,	:	
SHERRIFF SIMPSON,	:	
KESEAN HOLLEY,	:	
a/k/a "Jack,"	:	
TERRANCE BROWN,	:	
a/k/a "B-Love,"	:	
COREY EWINGS,	:	
ELIJAH ROBINSON,	:	
a/k/a "Horse,"	:	
BARRY JORDAN, JR., and	:	
FRAZIER BURTON	:	

I, Christopher M. Johnson, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Christopher M. Johnson

Christopher M. Johnson, Special Agent
Federal Bureau of Investigation

Special Agent Johnson attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1

December 15, 2021
Date

at District of New Jersey
County and State

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE

Honorable Leda Dunn Wettre
Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Distribute Fentanyl and Cocaine Base)

From in or about June 2021 through in or about December 2021, in Essex County, in the District of New Jersey and elsewhere, defendants

LEON CLARK,
a/k/a "Dino,"
ABDUL PRICE,
a/k/a "Ab,"
a/k/a "Dred,"
ELIJAWAN WHITE,
a/k/a "Eli,"
JANICE ANDERSON,
SHERRIFF SIMPSON,
KESEAN HOLLEY,
a/k/a "Jack,"
TERRANCE BROWN,
a/k/a "B-Love,"
COREY EWINGS,
ELIJAH ROBINSON,
a/k/a "Horse,"
BARRY JORDAN, JR., and
FRAZIER BURTON

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and 280 grams or more of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

ATTACHMENT B

I, Christopher M. Johnson, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

THE BROOKDALE AND ABINGER DTO

1. The defendants are members of a drug trafficking organization that operates an open-air narcotics market in and around the area of Brookdale Avenue and Abinger Place in Newark ("Brookdale and Abinger"). Members of the conspiracy include Leon Clark, a/k/a "Dino," ("CLARK"), Abdul Price, a/k/a "Ab" ("PRICE"), Janice Anderson ("ANDERSON"), Elijahwan White, a/k/a "Eli" ("WHITE"), Sherriff Simpson, a/k/a "K" ("SIMPSON"), Frazier Burton ("BURTON"), Kesean Holley, a/k/a "Jack" ("HOLLEY"), Elijah Robinson, a/k/a "Horse" ("ROBINSON"), Barry Jordan, Jr. ("JORDAN"), COREY EWINGS ("EWINGS"), and Terrance Brown, a/k/a "B-Love" ("BROWN"). During the timeframe relevant to the conspiracy as charged in Count One of this complaint, law enforcement extensively surveilled the area of Brookdale and Abinger through physical and fixed surveillance; used confidential informants to purchase narcotics, including substances that tested positive for the presence of heroin, fentanyl, and cocaine base; reviewed arrests and drug seizures made by local law enforcement in the area of Brookdale and Abinger; and analyzed telephone records demonstrating interactions between the co-conspirators, among other lawful means of investigation. The investigation has revealed that the Brookdale and Abinger drug trafficking organization (the "Brookdale and Abinger DTO") operates primarily out of three residential properties located on Brookdale Avenue.

2. The defendants conspired and agreed with each other and others to distribute large quantities of heroin, fentanyl, and cocaine base in the area of Brookdale and Abinger. As described in more detail below, law enforcement has used confidential informants to purchase heroin, fentanyl, and cocaine base from members of the DTO on seventeen occasions, resulting in the seizure

of more than thirty bricks¹ of suspected² heroin and more than eight grams of suspected³ cocaine base. Through information obtained during multiple controlled purchases, the investigation revealed that BURTON supplies the Brookdale and Abinger DTO with fentanyl-laced heroin.

3. The defendants worked together to distribute the heroin, fentanyl, and cocaine base to their customers. Evidence indicating collaboration among the co-conspirators includes, for example: telephone records showing, in some instances, hundreds of contacts between co-conspirators; physical interactions between co-conspirators, during which members of the Brookdale and Abinger DTO introduced buyers (including at least one confidential informant) to co-conspirators for the purpose of facilitating narcotics transactions; seizure of recurring stamps branding the heroin, indicating that members of the Brookdale and Abinger DTO obtained their narcotics from a common source of supply.

4. The evidence described below demonstrates that the defendants acted in concert to control the area in and around Brookdale and Abinger and that the drug distribution was coordinated among the conspirators.

SEIZURES OF NARCOTICS AROUND BROOKDALE AND ABINGER

July 23, 2021 Seizure

5. On or about July 23, 2021, law enforcement observed EWINGS interacting with other individuals in a manner consistent with hand-to-hand narcotics transactions outside 61-63 Brookdale Avenue. Law enforcement eventually approached EWINGS, observed a bulge in his waistband, and recovered a quantity of heroin bearing the stamp “very, very strong” from EWINGS. Law enforcement then searched a vehicle in which EWINGS had

¹ A “brick” is a term used to refer to fifty doses of heroin.

² Law enforcement has purchased glassine envelopes, each containing a single-dose quantity of a white powdery substance. The substances seized through these controlled purchases have been submitted for laboratory testing. To date, the substances purchased on at least ten occasions have tested positive for the presence of heroin and fentanyl. The results for the remaining purchases are pending.

³ Law enforcement has purchased plastic jugs containing a white rock-like substance on multiple occasions. The substances seized through these controlled purchases have been submitted for laboratory testing. To date, the substances purchased on at least ten occasions have tested positive for the presence of cocaine base. The results for the remaining purchases are pending.

been sitting and recovered over one hundred jugs containing suspected cocaine base. In total, law enforcement recovered approximately 55 glassine envelopes containing suspected heroin, approximately 106 plastic jugs containing suspected cocaine base, eight plastic bags containing suspected cocaine base, and approximately \$755.

August 26, 2021 Seizure

6. On or about August 26, 2021, law enforcement saw EWINGS interacting with multiple unidentified people in a manner consistent with narcotics transactions in the area of 61-63 Brookdale Avenue. EWINGS fled when law enforcement approached. After observing items consistent with drug distribution in plain view inside a vehicle registered to EWINGS, law enforcement towed the vehicle pending a search warrant. Law enforcement obtained a warrant to search the vehicle and recovered approximately 436 glassine envelopes containing suspected heroin and approximately 125 plastic jugs containing suspected cocaine base. The glassine envelopes were marked with the stamps “very, very strong” and “dynasty.”

September 4, 2021 Seizure

7. On or about September 4, 2021, law enforcement arrested JORDAN on an outstanding warrant in the area of Brookdale and Abinger. During a subsequent search, law enforcement recovered approximately three glassine envelopes containing suspected heroin, approximately sixteen plastic jugs containing suspected cocaine base, and approximately \$320. The glassine envelopes were marked with the stamp “very, very strong.”

September 15, 2021 Seizure

8. After observing PRICE engage in conduct that appeared to be consistent with a hand-to-hand narcotics transaction in the vicinity of 112-115 Brookdale Avenue on or about September 15, 2021, law enforcement conducted a search and recovered, among other things, approximately fifty glassine envelopes containing suspected heroin and \$481. The glassine envelopes were marked with the stamp “very, very strong.”

October 12, 2021 Seizure

9. On or about October 12, 2021, law enforcement saw JORDAN and ROBINSON interacting with other individuals in a manner consistent with hand-to-hand narcotics transactions in the area of 61-63 Brookdale Avenue. ROBINSON then began to depart the area in a Nissan. Law enforcement stopped the vehicle and recovered approximately forty glassine envelopes containing suspected heroin and approximately twenty-three jugs containing

suspected cocaine base from a magnetic box concealed under the vehicle. The glassine envelopes were branded with the stamp “rope-a-dope.” During a search incident to JORDAN’s arrest, law enforcement recovered approximately \$224. During a search incident to ROBINSON’s arrest, law enforcement recovered \$320. Law enforcement subsequently obtained a warrant to search a Ford minivan associated with ROBINSON, which ROBINSON and other defendants used as a stash vehicle. During the search, law enforcement recovered, among other items, approximately 132 glassine envelopes containing suspected heroin, approximately twenty-five plastic jugs containing suspected cocaine base, and a Kel-Tec 9 millimeter handgun, bearing serial number 119427.

November 13, 2021 Seizure

10. After observing PRICE engage in multiple suspected hand-to-hand narcotics transactions in the area of Brookdale and Abinger on or about November 13, 2021, law enforcement searched PRICE and recovered approximately nine glassine envelopes containing suspected heroin and approximately \$957. The glassine envelopes were marked with the stamp “cornbread.”

November 29, 2021

11. After observing SIMPSON engage in multiple suspected hand-to-hand narcotics transactions outside 115 Brookdale Avenue, law enforcement recovered approximately forty-three glassine envelopes containing suspected heroin and approximately twenty-two jugs of suspected cocaine base from SIMPSON. The glassine envelopes were marked with the stamps “street doctor” and “perfect 11.”

December 15, 2021

12. The FBI executed a search warrant at BURTON’s residence on South Munn Avenue in Newark on or about December 15, 2021. During the search, law enforcement recovered, among other things, approximately 100 bricks of suspected heroin and fentanyl bearing the stamps “what’s good” and “cornbread.”

CONTROLLED PURCHASES OF HEROIN AND COCAINE BASE

13. In addition to the seizures described above, between June 2021 and December 2021, the FBI used confidential informants to purchase fentanyl-laced heroin and cocaine base from eight members of the Brookdale and Abinger DTO. All of these transactions were conducted the area of Brookdale and Abinger, and all of the transactions were recorded with body-worn recording devices. Prior to each controlled purchase, law enforcement

officers ensured that the confidential informant making the purchase did not have any unauthorized contraband or currency.

Buy No.	Date	Defendant	Substance Purchased	Brand of Heroin
1	06/03/2021	SIMPSON; ANDERSON	Heroin/Fentanyl Cocaine Base	What's Good; Bread & Butter
2	06/09/2021	ANDERSON	Cocaine base	
3	06/10/2021	HOLLEY	Heroin/Fentanyl Cocaine base	Peace Pipe; Illuminati
4	07/01/2021	PRICE; ANDERSON	Heroin/Fentanyl Cocaine base	What's Good; Total Control
5	07/13/2021	PRICE	Heroin/Fentanyl Cocaine base	Very, Very Strong ("VVS")
6	07/27/2021	BROWN; ANDERSON	Heroin/Fentanyl Cocaine base	VVS
7	07/29/2021	EWINGS; ANDERSON	Heroin/fentanyl	VVS
8	08/04/2021	FNU LNU; ANDERSON; WHITE	Heroin/fentanyl Cocaine base	VVS
9	08/18/2021	EWINGS; ANDERSON	Heroin/fentanyl Cocaine base	VVS
10	08/31/2021	BROWN; ANDERSON	Heroin/fentanyl Cocaine base	VVS
11	09/07/2021	EWINGS; ANDERSON	Heroin/fentanyl Cocaine base	Billions with money bags
12	09/14/2021	SIMPSON; PRICE; ANDERSON	Heroin/fentanyl Cocaine base	VVS
13	09/21/2021	PRICE	Heroin/fentanyl Cocaine base	VVS

14	09/28/2021	PRICE; ANDERSON	Heroin/fentanyl Cocaine base	VVS
15	10/28/2021	PRICE; SIMPSON ANDERSON	Heroin/fentanyl Cocaine base	VVS
16	11/10/2021	CLARK; ANDERSON; WHITE	Heroin/fentanyl Cocaine base	Cornbread
17	12/02/2021	ANDERSON	Cocaine base	

SURVEILLANCE

14. During the timeframe of the conspiracy, law enforcement monitored Brookdale and Abinger through physical and fixed surveillance. Over the course of the investigation, law enforcement obtained hundreds of hours of video footage depicting the Brookdale and Abinger DTO engaging in narcotics transactions. The footage captured: hundreds of narcotics transactions involving the defendants, primarily occurring in the areas of 115 Brookdale Avenue, 112-114 Brookdale Avenue, and 61-63 Brookdale Avenue; daily interactions between members of the conspiracy; a constant stream of buyers approaching the area for brief interactions; co-conspirators holding, passing, and counting drug proceeds amongst themselves, among other evidence.

15. Based on the narcotics seized during the course of the investigation and the hundreds of transactions captured by law enforcement, the investigation revealed that the co-conspirators⁴ distributed more than 400 grams of fentanyl and more than 280 grams of cocaine base during the conspiracy period.

PHONE CONNECTIONS

16. Many of the defendants provided their phone numbers to confidential informants to facilitate future drug transactions. Using these telephone numbers and telephone numbers obtained from other sources,

⁴ HOLLEY was arrested on other charges and has been detained pending adjudication of those charges since August 29, 2021. JORDAN has been detained pending resolution of State charges since on or about October 12, 2021. ROBINSON has been detained pending resolution of State charges since on or about November 9, 2021.

records show hundreds of calls between nearly all of the defendants during the conspiracy period. For example:

- ANDERSON and CLARK shared approximately 1011 events (321 outgoing and 690 incoming) over from 5/20/2021 to 12/04/2021.
- ANDERSON and WHITE shared approximately 251 events (110 outgoing and 141 incoming) from 6/1/2021 to 12/7/2021.
- ANDERSON and PRICE shared approximately 41 events (26 outgoing and 15 incoming) from 6/13/2021 to 12/2/2021.
- PRICE and CLARK shared approximately 103 events (52 outgoing and 51) from 5/7/2021 to 9/14/2021.
- WHITE and CLARK shared approximately 129 events (64 outgoing and 65 incoming) from 6/17/2021 to 9/15/2021.
- WHITE and HOLLEY shared approximately 43 events (8 outgoing and 35 incoming) from 4/10/2021 to 5/26/2021.
- SIMPSON and PRICE shared approximately 10 events (5 outgoing and 5 incoming) from 4/10/2021 to 5/10/2021.
- BURTON and PRICE shared approximately 134 events (75 outgoing and 59 incoming) between October 7, 2021 and November 5, 2021.
- BURTON and CLARK shared approximately 13 events (1 outgoing and 12 incoming) between November 2, 2021 and November 10, 2021.