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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Cathy L. Waldor  
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 JEROME POWELL : Mag. No. 20-9007  
 a/k/a "Jesse Powell," :  
 RAHEEM ROGERS, :  
 KAREE CUNNINGHAM, :  
 RAFIQ HOLMES, and :  
 MATTHEW COLLIER :

I, Brian Greene, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Task Force Officer with the Drug Enforcement Administration and that this complaint is based on the following facts:

**SEE ATTACHMENT B**



\_\_\_\_\_  
Brian Greene, Task Force Officer  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,  
February 3, 2020, Essex County, New Jersey

Honorable Cathy L. Waldor  
United States Magistrate Judge



\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Distribute and Possess with Intent to  
Distribute Heroin and Cocaine)

From in or around August 2019 through on or about February 2, 2020, in  
Hudson County, in the District of New Jersey and elsewhere, defendants,

**JEROME POWELL,  
a/k/a "Jesse Powell,"  
RAHEEM ROGERS,  
KAREE CUNNINGHAM,  
RAFIQ HOLMES, and  
MATTHEW COLLIER,**

did knowingly and intentionally conspire and agree with each other and with  
others to distribute and possess with intent to distribute a mixture and  
substance containing a detectable amount of heroin, a Schedule I controlled  
substance, and a mixture and substance containing a detectable amount of  
cocaine, a Schedule II controlled substance, contrary to Title 21, United States  
Code, Sections 841(a)(1) and (b)(1)(C).

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

## **ATTACHMENT B**

I, Brian Greene, am a Task Force Officer with the Drug Enforcement Administration. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, my review of reports, statements of individuals, documents, lawfully recorded communications, and photographs of the evidence. 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.

1. Since at least in or around August 2019, law enforcement has been investigating a drug-trafficking organization (“DTO”) operating in the area of Bartholdi Avenue in Jersey City, New Jersey.

2. Based upon the investigation, Jerome Powell, a/k/a “Jesse Powell” (“POWELL”)—the DTO’s leader—delivers controlled substances from a stash location in Jersey City to a residence on Bartholdi Avenue (the “Bartholdi Residence”). After POWELL delivers the controlled substances, they are stored at the Bartholdi Residence, where the distributors—other members of the DTO including Raheem Rogers (“ROGERS”), Karee Cunningham (“CUNNINGHAM”), Rafiq Holmes (“HOLMES”), and Matthew Collier (“COLLIER”)—have access to then conduct hand-to-hand narcotics transactions outside of the Bartholdi Residence.

3. On or about August 2, 2019, based on law enforcement surveillance, CUNNINGHAM distributed controlled substances, specifically heroin and cocaine, from the Bartholdi Residence to two buyers who were waiting nearby. Following the hand-to-hand transaction, law enforcement stopped one of the buyers and seized a quantity of cocaine.

4. Thereafter, from in and around August 2019 through on or about February 2, 2020, law enforcement observed and video recorded ROGERS, COLLIER, HOLMES, and/or CUNNINGHAM distributing suspected controlled substances from within and near the Bartholdi Residence.

5. Based upon surveillance conducted by law enforcement via cameras in the area of the Bartholdi Residence, from at least in or around September 2019 through on or about February 2, 2020, POWELL routinely drove a Honda Accord (“the Honda”) to the vicinity of the Bartholdi Residence and was met by ROGERS, COLLIER, HOLMES and/or CUNNINGHAM, who appeared to remove the narcotics supply from the Honda and immediately enter the Bartholdi Residence. Thereafter, ROGERS, COLLIER, HOLMES and/or CUNNINGHAM routinely conducted hand-to-hand narcotics transactions in the vicinity of the

Bartholdi Residence. Law enforcement has also observed POWELL collecting what appeared to be U.S. currency from narcotics transactions.

6. On or about January 25, 2020, law enforcement conducted surveillance via camera in the area of the Bartholdi Residence. POWELL was observed arriving in the area of the Bartholdi Residence in the Honda. ROGERS approached the Honda and appeared to retrieve an item from within which he immediately put in his pocket. ROGERS then immediately entered the Bartholdi Residence with HOLMES. HOLMES then exited the Bartholdi Residence and began conducting hand-to-hand narcotics transactions with buyers in the vicinity of the Bartholdi Residence. During this time, POWELL, CUNNINGHAM and ROGERS were observed nearby. Following an observed hand-to-hand transaction with HOLMES, law enforcement stopped the buyer. The buyer was found to be in possession of three bags of heroin.

7. On or about January 29, 2020, law enforcement conducted surveillance via camera in the area of the Bartholdi Residence. POWELL was observed in the Honda arriving in the area of the Bartholdi Residence. HOLMES approached the Honda, retrieved an item from within, and then immediately entered the Bartholdi Residence. HOLMES then exited the Bartholdi Residence and put an item back into the Honda while CUNNINGHAM began conducting hand-to-hand narcotics transactions with buyers in the vicinity of the Bartholdi Residence.

8. On or about January 31, 2020, law enforcement conducted surveillance via camera in the area of the Bartholdi Residence. POWELL stood outside the Honda, across the street from the Bartholdi Residence, while ROGERS appeared to conduct hand-to-hand narcotics transactions with buyers in the vicinity of the Bartholdi Residence. Following observed hand-to-hand transactions by ROGERS, law enforcement stopped two buyers and recovered cocaine and heroin.

9. On or about February 1, 2020, law enforcement conducted surveillance via camera in the area of the Bartholdi Residence. POWELL was observed in the Honda arriving in the area of the Bartholdi Residence and meeting with COLLIER and HOLMES. HOLMES then conducted hand-to-hand narcotics transactions with buyers in the vicinity of the Bartholdi Residence, while POWELL and COLLIER remained nearby. At one point, POWELL left in the Honda, drove to the stash location, and later returned to the Bartholdi Residence. HOLMES then approached the Honda, retrieved an item from within, and then immediately entered the Bartholdi Residence. HOLMES then exited the Bartholdi Residence and put an item back into the Honda, while ROGERS and COLLIER stood nearby. HOLMES then conducted hand-to-hand narcotics transactions with buyers in the vicinity of the Bartholdi Residence. Following an observed hand-to-hand transaction with HOLMES, law enforcement stopped the buyer. The buyer was found to be in possession of ten bags of heroin.

10. On or about February 2, 2020, law enforcement conducted surveillance via camera in the area of the Bartholdi Residence. POWELL stood nearby while COLLIER appeared to conduct hand-to-hand narcotics transactions with buyers in the vicinity of the Bartholdi Residence. Following observed hand-to-hand transactions by COLLIER, law enforcement stopped a buyer and recovered cocaine and heroin.