
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY


UNITED STATES OF AMERICA : **AMENDED CRIMINAL COMPLAINT**
 :
 v. : Honorable Michael A. Hammer Mag.
 :
 LEONARD WADE, : No. 20-8425 (JAD)
 a/k/a "Clap" :

I, Timothy Griswold, 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



Timothy Griswold
Task Force Officer, DEA

Task Force Officer Griswold attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) on the 15th day of October, 2020. 9:33 A.M.

Honorable Michael A. Hammer
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of Ammunition by a Convicted Felon)

On or about October 1, 2020, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

**LEONARD WADE,
a/k/a "Clap,"**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce ammunition—namely, five rounds of .45 caliber ammunition and 50 rounds of 9 mm ammunition.

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

COUNT TWO

(Conspiracy to Distribute Fentanyl and Heroin)

From in or around July 2020 to on or about October 1, 2020, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

**LEONARD WADE,
a/k/a "Clap,"**

did knowingly and intentionally conspire and agree with Ezra A. Strong and others to distribute and to 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 100 grams 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 (b)(1)(A).

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

ATTACHMENT B

I, Timothy Griswold, 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, and my review of reports, documents, and 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 and time, I am asserting that it took place on or about the date and time alleged.

1. Law enforcement is currently involved in an investigation into a drug trafficking organization ("DTO") operating in New Jersey, including in Monmouth and Middlesex Counties, New Jersey, Pennsylvania, and elsewhere. The Defendant, Leonard Wade, a/k/a "Clap" ("WADE"), is believed to be a ranking member of Sex Money Murder ("SMM"), a subset of the Bloods street gang. WADE is also believed to be a member and leader of the DTO, which distributes significant quantities of heroin and fentanyl. WADE's co-conspirator, Ezra A. Strong, a/k/a "Doonka" ("STRONG"),¹ is believed to be a ranking member of the Fruit Town Brims, a subset of the Bloods street gang, and a member of the DTO who distributes narcotics on behalf of the DTO. To date, the investigation of WADE, STRONG, and the DTO has included, among other things, surveillance, recorded and monitored conversations, and recorded controlled purchases of fentanyl from WADE and STRONG. The investigation has revealed that WADE is a source of supply to STRONG and that they work together on behalf of the DTO to distribute narcotics.

2. For instance, from in or around July 2020 to in or around August 2020, STRONG and WADE engaged in approximately three narcotics transactions, on behalf of the DTO, with a confidential source who, at the time, was working at the direction of and under the supervision of law enforcement (the "CS"). Each time, WADE and/or STRONG and the CS met at a pre-determined location, WADE and/or STRONG provided the CS with a quantity of suspected raw heroin/fentanyl. These transactions were observed by law enforcement and were audio and video recorded.

3. These narcotics were subsequently laboratory tested. Based on the results of the laboratory testing, in total over the course of these transactions, WADE and STRONG sold the CS over 32 grams of a substance containing fentanyl.

¹ On or about October 13, 2020, STRONG was charged by separate complaint with conspiracy to distribute fentanyl and heroin, in violation of 21 U.S.C. § 846 (see Mag. No. 20-10335 (MAH)).

4. On or about October 1, 2020, law enforcement executed a search warrant of WADE's residence in New Brunswick, New Jersey (the "Residence"), where he resides with his significant other (the "Significant Other").² Upon a search of WADE's bedroom, law enforcement found a bag in a laundry basket containing a 9mm caliber semi-automatic polymer handgun (the "weapon"),³ along with a 50-round box containing approximately 50 rounds of 9mm ammunition. In a hallway closet, law enforcement found approximately 5 rounds of .45 caliber ammunition (along with the 9mm ammunition, the "Ammunition") and narcotics packaging materials, including baggies, a stamp, and cutting agent. Under the mattress in the bedroom, law enforcement found an undetermined sum of United States currency.

5. Under the sink in the kitchen of the Residence, law enforcement found approximately three plastic baggies containing narcotics. More specifically, one baggie contained approximately 129 grams of a substance that field-tested positive for the presence of fentanyl; a second baggie contained approximately 60 grams of a substance that field-tested positive for the presence of fentanyl; and the third baggie contained approximately 77 grams of a substance that field-tested positive for the presence of heroin. Additionally, inside the refrigerator, law enforcement found and seized a plastic bag containing approximately 132 grams of a substance that field-tested positive for the presence of fentanyl.

6. The same day, law enforcement conducted a lawful search of an identified narcotics stash location in East Stroudsburg, Pennsylvania (the "Stash Location") utilized by WADE in furtherance of the DTO's activities. The Stash Location is in the Significant Other's name, who consented to the search of the Stash Location. In a closet in the bedroom of the Significant Other's daughter, law enforcement located a backpack that contained raw narcotics. Specifically, the bag contained approximately 478 grams of a substance that field-tested positive for the presence of fentanyl and approximately 535 grams of a substance that field-tested positive for the presence of heroin.

7. Law enforcement Mirandized the Significant Other and she agreed to speak to law enforcement. The Significant Other told law enforcement that the narcotics found at the Stash Location do not belong to her, to her father, who

² On or about October 1, 2020, law enforcement applied to this Court for authorization to search the Residence. The same day, this Court authorized that request (see Mag. No. 20-8424 (JAD)).

³ WADE was previously charged by complaint on or about October 2, 2020 with possession of a firearm and ammunition by a convicted felon, in violation of 18 U.S.C. § 922(g) (see Mag. No. 20-8426 (JAD)). This complaint has been amended to charge WADE only with possession of ammunition by a convicted felon, in violation of 18 U.S.C. § 922(g), as subsequent examination of the weapon revealed that it cannot be determined that the "privately made" polymer weapon, commonly referred to as a "ghost gun," recovered at the Residence, traveled in interstate commerce.

resides at the Stash Location, or to her daughters, who reside at the Stash Location. Based on these statements, and the investigation to date, law enforcement believes these narcotics belong to WADE.

8. In total over the course of the investigation, law enforcement has seized approximately 831 grams of suspected fentanyl and 612 grams of suspected heroin, which is believed to be part of the conspiracy to distribute fentanyl and heroin on behalf of the DTO.

9. Prior to WADE's possession of Ammunition in New Jersey on or about October 1, 2020, the Ammunition moved in interstate commerce.

10. Prior to knowingly possessing the Ammunition on or about October 1, 2020, WADE also knew that he was a convicted felon, as he had at least four felony convictions for which he received a sentence of more than one year. In particular, on or about July 18, 2014, WADE was convicted in the United States District Court for the District of New Jersey, of Unlawful Possession of a Firearm by a Convicted Felon, in violation of Title 18, United States Code, Section 922(g)(1), a crime punishable by imprisonment for a term exceeding one year, and for which WADE was sentenced to a term of seventy-two months' imprisonment.