UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	Mag. No. 21-11030
	:	
v.	:	Hon. Andre M. Espinosa
	:	
CORY BOYD,	:	
a/k/a "Lucky,"	:	
a/k/a "Gunz";	:	
STEFAN CAMERON,	:	
a/k/a "Jamaic";	:	
EDWIN DIAZ,	:	
a/k/a "E";	:	
KASSAN DRAKEFORD,	:	
a/k/a "K";	:	
LEO EDWARDS,	:	
a/k/a "JB";	:	
KWAME ELLIS,	:	
a/k/a "L",	:	
a/k/a "Miggs";	:	
ANTHONY HERRING,	:	
a/k/a "Q,"	:	
a/k/a "QB";	:	
DEVIN KYLE,	:	
a/k/a "Bernie,"	:	
a/k/a "B-Mac,"	:	
a/k/a "B,"	:	
a/k/a "Stacks";	:	
SEAN MORGAN; and	:	
BRENT STATON,	:	
a/k/a "Spazz"	:	

I, Thomas A. Gilbride, 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 Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:

Special Agent Thomas A. Gilbride
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to and subscribed to me by telephone pursuant to F.R.C.P. 4.1(B)(2)(A), on April 27, 2021 in Newark, New Jersey

HONORABLE ANDRE M. ESPINOSA
UNITED STATES MAGISTRATE JUDGE

S/ Andre M. Espinosa
Signature of Judicial Officer

ATTACHMENT A

Count One

(Conspiracy to Distribute Heroin, Fentanyl, and Cocaine Base)

From at least in or around February 2020 through April 26, 2021, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

CORY BOYD,
a/k/a "Lucky,"
a/k/a "Gunz";
STEFAN CAMERON,
a/k/a "Jamaic";
EDWIN DIAZ,
a/k/a "E";
KASSAN DRAKEFORD,
a/k/a "K";
LEO EDWARDS,
a/k/a "JB";
KWAME ELLIS,
a/k/a "L,"
a/k/a "Miggs";
ANTHONY HERRING,
a/k/a "Q,"
a/k/a "QB";
DEVIN KYLE,
a/k/a "Bernie,"
a/k/a "B-Mac,"
a/k/a "B,"
a/k/a "Stacks";
SEAN MORGAN; and
BRENT STATON,
a/k/a "Spazz"

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

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

ATTACHMENT B

I, Thomas A. Gilbride, have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") since 2018, and I have been involved personally in the investigation of this matter. The information contained within this complaint is based upon my personal knowledge and on information obtained from other sources, including but not limited to: (a) statements made or reported by witnesses with knowledge of relevant facts; (b) my review of documents and evidence obtained through court orders, subpoenas, and other sources; (c) assistance provided to law enforcement by multiple confidential sources of information; and (d) my review of audio and video recordings of controlled purchases of narcotics. 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 the contents of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part. 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 Investigation

1. Since at least February 2020, law enforcement, including, but not limited to, the ATF, the United States Drug Enforcement Administration, and local law enforcement have been investigating the UpTop Gang ("UpTop"). UpTop is a street gang that operates primarily in and around Governor and Carroll Streets, as well as in and around the Inca Village Housing complex, and Harrison Street between Rosa Parks Boulevard and Carroll Street, all within the City of Paterson, New Jersey (the gang's "turf"). The investigation has consisted of, among other investigative tools, numerous controlled purchases of narcotics, consensually recorded telephone calls and text messages, physical surveillance, and analysis of telephone call detail records.

2. UpTop derived its name from its location; its turf is colloquially described as being "up the hill" in the Fourth Ward of Paterson. Certain members and associates of UpTop were formerly members and associates of the 230 Boys, a gang that operates in and around Rosa Parks Boulevard and Godwin Avenue in Paterson, with whom UpTop has a longstanding alliance. Members and associates of UpTop are involved in ongoing violent feuds with gangs operating in the First and Fifth Wards of Paterson, to include the 100K Boys and the Trinitarios.

3. The investigation has revealed that Cory Boyd, a/k/a "Lucky," a/k/a "Gunz" ("BOYD"), Stefan Cameron, a/k/a "Jamaic" ("CAMERON"), Edwin Diaz, a/k/a "E" ("DIAZ"), Kassan Drakeford, a/k/a "K" ("DRAKEFORD"), Leo Edwards, a/k/a "JB" ("EDWARDS"), Kwame Ellis, a/k/a "L," a/k/a "Miggs" ("ELLIS"), Anthony Herring, a/k/a "Q," a/k/a "QB" ("HERRING"), Devin Kyle,

a/k/a "Bernie," a/k/a "B-Mac," a/k/a "B," a/k/a "Stacks" ("KYLE"), Sean Morgan ("MORGAN"), and Brent Staton, a/k/a "Spazz" ("STATON"), are all members and associates of UpTop, and are all involved in the trafficking of narcotics within Paterson, New Jersey, and elsewhere.

Conspiracy to Distribute Narcotics

4. The investigation has revealed that members and associates of the UpTop distribute narcotics, including heroin, fentanyl, and cocaine base, in and around their turf. Members of UpTop sell heroin that is frequently mixed with fentanyl, a potent, synthetic opioid that is approximately 50 times stronger than heroin. Heroin and fentanyl distributed by UpTop is packaged in glassine envelopes, commonly referred to as "decks." These "decks" are commonly sold by UpTop in "bundles" and "bricks." In Paterson, a "bundle" commonly refers to approximately ten decks of heroin, grouped together. A "brick" commonly refers to approximately 50 decks, often packaged as five bundles that have been grouped together.

5. UpTop members and associates distribute decks of heroin and fentanyl that are almost always stamped or labeled with various "brand names" in colored ink. These brand names allow the dealers and purchasers alike to differentiate and market batches of heroin. For example, as described herein, on various occasions, glassine envelopes stamped "G-STAR" were sold by defendants BOYD, HERRING, CAMERON, and MORGAN. Moreover, on various occasions, glassine envelopes stamped "X-MEN" were sold by defendants BOYD, KYLE, and MORGAN.

6. Members and associates of UpTop sometimes compete with each other for narcotics customers within the gang's turf. However, the investigation has shown that UpTop work together to ensure that outsiders are unable to distribute narcotics within the turf. Thus, members and associates of UpTop work together to preserve and protect the power, territory, and reputation of the gang, and to hinder, obstruct, and prevent law enforcement officers from identifying participant's criminal activities, from apprehending offenders of the crimes, and from successfully prosecuting and punishing the offenders.

7. The investigation has revealed the manner and means by which members and associates of UpTop carried out the objectives of the charged conspiracies to distribute narcotics. Among other things, members and associates of UpTop did the following in furtherance of the conspiracies' unlawful objectives:

a. Negotiated narcotics sales inside and around various business establishments located within the gang's turf;

b. Utilized abandoned properties and residential yards to store narcotics and narcotics proceeds and conduct narcotics transactions;

c. Represented the gang on social media, by using names, or "handles" that contained reference to the gang;

d. Took affirmative steps to evade detection by law enforcement, including using multiple cellular telephone facilities to communicate with each other and with narcotics purchasers, and speaking in coded language to disguise the illicit nature of their discussions. For example, members and associates of UpTop typically refer to heroin as "diesel."

8. Often, multiple members and associates of UpTop work together to distribute narcotics. For example, one member may arrange for the sale, and then send a second member and associate to provide the controlled substances to the buyer. Indeed, as detailed in the chart below, on or about March 18, 2021, CAMERON and MORGAN worked together to distribute suspected heroin to a confidential source, in that CAMERON arranged the terms of the sale and MORGAN delivered the controlled substances and accepted payment.

9. Additionally, UpTop gang members sometimes work as "lookouts" for other gang members, to ensure that law enforcement is not in the vicinity while other members distribute controlled substances. For example, as detailed in the chart, below, on or about July 1, 2020, another member and associate of UpTop acted as a lookout while DRAKEFORD distributed heroin to a confidential source.

10. The investigation has also revealed that members and associates of UpTop have access to firearms. For example, law enforcement reviewed photographs that revealed that members and associates of the gang possessed firearms.

Controlled Buys of Heroin, Fentanyl, and Cocaine Base

11. Between on or about February 4, 2020 and on or about April 14, 2021, using more than one confidential source ("CS"), law enforcement conducted numerous controlled purchases of narcotics, to include heroin, fentanyl, and cocaine base, from members and associates of UpTop. Prior to each controlled purchase, law enforcement officers outfitted each CS and/or his/her vehicle with audio and video recording devices. Law enforcement also provided each CS with U.S. currency to use to purchase the controlled substances. These controlled purchases are outlined in the chart, below:

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
Feb. 4, 2020	EDWARDS and FNU LNU 1	3 bundles, stamped "Fire"	Fentanyl (FT)
Feb. 12, 2020	EDWARDS	1 brick, stamped "Barry Bondd"	Fentanyl (FT)
July 1, 2020	DRAKEFORD	1 brick, stamped "Block Stopper"	Heroin (FT)
July 30, 2020	DRAKEFORD	3 bundles, stamped "Malibu"	Laboratory testing pending
Aug. 6, 2020	HERRING	1 brick, stamped "ANEXO"	Laboratory testing pending
Aug. 27, 2020	BOYD and HERRING	3 bricks, stamped "G-STAR"	Laboratory testing pending
Sept. 2, 2020	BOYD	3 bricks, stamped "X-MEN," and four bags of suspected cocaine base	Laboratory testing pending
Sept. 16, 2020	KYLE,ELLIS, and DIAZ	1 brick, stamped "X-MEN," and eight bags of suspected cocaine base	Laboratory testing pending
Sept. 16, 2020	BOYD	28 grams of suspected cocaine base	Laboratory testing pending
Oct. 8, 2020	ELLIS	10 vials of suspected cocaine base	Laboratory testing pending
Oct. 27, 2020	DIAZ	3 bricks, stamped "MEMPHIS GRIZZLIES" and "AK47"	Laboratory testing pending
Nov. 19, 2020	HERRING	2 bundles, stamped "Venom," and approximately 25.9 grams of cocaine base	Fentanyl (L) and cocaine base (L)

Feb. 23, 2021	CAMERON and ELLIS	10 vials of cocaine base and two bricks, stamped "Team #1"	Cocaine base (L); laboratory testing pending as to the bricks
Feb. 25, 2021	CAMERON	2 bricks, stamped "HOT SHOT," and one bag containing .465 grams of cocaine base	Cocaine base (L); laboratory testing pending as to the bricks
March 10, 2021	CAMERON and STATON	Seven bricks, stamped "The Joker," and 9.97 grams of cocaine base	Cocaine base (L); laboratory testing pending as to the bricks
March 18, 2021	CAMERON and MORGAN	Five bricks, stamped "G-STAR"	Laboratory testing pending
April 14, 2021	MORGAN	Five bricks, stamped "X-MEN"	Laboratory testing pending

Seizures of Contraband From UpTop Members and Associates

March 21, 2021 Seizure of Controlled Substances

12. On or about March 21, 2021, five members and associates of UpTop, were shot in the vicinity of Carroll and Governor Streets. BOYD transported one such victim to a local hospital in a car belonging to the significant other of EDWARDS (the "Vehicle"). Pursuant to a lawful search of the Vehicle, officers recovered approximately 90 glassines of suspected heroin from the Vehicle.

March 23, 2021 Seizure from BOYD

13. On or about March 23, 2021, law enforcement officers observed BOYD in the vicinity of Carroll and Hamilton Streets, holding a large blue container labeled, "Planters" (the "Container"). The officer observed BOYD meet with an unidentified individual, retrieve a small item from the Container, and hand it to the unidentified individual in exchange for a quantity of money.

14. Believing that they had observed a narcotics transaction, the officers approached BOYD and Individual-1 and announced that they were law enforcement officers. Individual-1 quickly walked away. BOYD dropped the Container and stated, in sum and substance, "F—k, I'm going to jail." An

officer secured the Container and discovered that it had a false bottom and held: (a) approximately 196 glassines, stamped "Don Julio," containing a substance which, based on his training and experience and the substance's appearance, appeared to be heroin, and (b) approximately 60 capsules containing a substance which, based on his training and experience and the substance's appearance, appeared to be cocaine base. BOYD was also in possession of approximately $131.