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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, U.S.M.J.  
 :  
 DANIEL HOOBAN, : Mag. No. 20-9262  
 a/k/a "WHITE BOY" :  
 a/k/a "DANIEL BLACK" :

I, John R. Lynn, 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**

*John R. Lynn*

\_\_\_\_\_  
John R. Lynn, Task Force Officer  
U.S. Drug Enforcement Administration

Task Force Officer Lynn attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)

June 30, 2020 at \_\_\_\_\_  
Date

at District of New Jersey \_\_\_\_\_  
County and State

HONORABLE CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE

*Hon. Cathy L. Waldor, U.S.M.J.*  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Possession with Intent to Distribute Cocaine and Cocaine Base)

On or about June 29, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**DANIEL HOOBAN,**

**a/k/a “White Boy,”  
a/k/a “Daniel Black,”**

knowingly and intentionally did possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWO**

(Possession of a Firearm by a Convicted Felon)

On or about June 29, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**DANIEL HOOBAN,**

**a/k/a “White Boy,”  
a/k/a “Daniel Black,”**

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 a firearm and ammunition, namely a Glock 26 9 millimeter handgun, bearing serial number FSC107, loaded with ten (10) rounds of 9 millimeter ammunition.

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

**COUNT THREE**

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about June 29, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**DANIEL HOOBAN,**

**a/k/a “White Boy,”  
a/k/a “Daniel Black,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine and a quantity of a mixture and substance containing a detectable amount of cocaine base, did knowingly possess a firearm, namely a Glock 26 9 millimeter handgun, bearing serial number FSC107, loaded with ten (10) rounds of 9 millimeter ammunition.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

## **ATTACHMENT B**

I, John R. Lynn, 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 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.

1. Based on information acquired during an ongoing narcotics investigation, law enforcement obtained a warrant to search the residence of Daniel Hooban (“HOOBAN”) on or about June 29, 2020. HOOBAN was present at the residence during the search.

2. During the search of HOOBAN’s residence, law enforcement recovered, among other items, approximately thirty-three (33) grams of cocaine, approximately eight (8) grams of cocaine base, and one Glock 26 9 millimeter handgun, bearing serial number FSC107 (the “Firearm”), loaded with ten (10) rounds of 9 millimeter ammunition (the “Ammunition”).

3. The Firearm and the Ammunition were manufactured outside the State of New Jersey and thus moved in and affected interstate commerce prior to June 29, 2020.

4. On or about November 16, 2007, HOOBAN was convicted in the Superior Court of New Jersey, Hudson County, of robbery, in violation of N.J.S.A. § 2C:15-1, a crime punishable by a term of imprisonment exceeding one year.

5. On or about November 4, 2016, HOOBAN was convicted in the Superior Court of New Jersey, Hudson County, of distributing, dispensing, or possessing with intent to distribute a controlled substance within 1,000 feet of school property, in violation of N.J.S.A. § 2C:35-7.