

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

Candace Gottlieb

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)
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)
)

Case No.

18-1015 (AMD)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2018 to May 2018 in the county of Camden in the District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

21 USC 846

21 USC 841(a)(1) and 841(b)(1)(C)

Conspiracy to Distribute and to Possess with Intent to Distribute Fentanyl, Heroin, Cocaine, and Marijuana (See Attachment A)

This criminal complaint is based on these facts:

Affidavit (See Attachment B)

Continued on the attached sheet.

[Signature]

Complainant's signature

Dustin Poulin, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/30/2018

[Signature]

Judge's signature

City and state: Camden, New Jersey

Hon. Ann Marie Donio, U.S. Magistrate Judge

Printed name and title

# CONTENTS APPROVED

UNITED STATES ATTORNEY

By: /s/ Gabriel J. Vidoni  
Gabriel J. Vidoni, Assistant U.S. Attorney

Date: May 30, 2018

**Attachment A**

From in or about March 2018 and continuing through in or about May 2018, in Camden County, in the District of New Jersey and elsewhere, defendant

CANDACE GOTTLIEB

did knowingly and intentionally conspire and agree with Tyler Gottlieb and with others, known and unknown, to distribute and to possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, and marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and all in violation of Title 21, United States Code, Section 846.

**ATTACHMENT B:**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTS AND ARREST WARRANTS**

**I. INTRODUCTION**

1. I, Dustin Poulin, am a Special Agent with the Federal Bureau of Investigation (“FBI”) and a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I am presently assigned to the FBI Philadelphia Division, South Jersey Violent Offender and Gang Task Force (“SJVOGTF”) in Cherry Hill, New Jersey. I have been a Special Agent with the FBI since June 2015. Prior to becoming a Special Agent, I served with the FBI since December 2009 as an Operation Support Technician and Staff Operations Specialist in the FBI Boston Division, Boston, Massachusetts. I have participated in narcotics and gang investigations and debriefed or participated in the debriefings of defendants, informants, and witnesses who had personal knowledge of narcotics trafficking and gang organizations. I have participated in many aspects of narcotics/gang investigations including conducting physical and electronic surveillance, analyzing telephone toll information obtained through subpoenas, analyzing information obtained through court-ordered pen registers and trap and trace intercepts, overseeing the activities of and debriefing confidential human sources, and executing arrest and search warrants. I have coordinated controlled purchases of illegal drugs utilizing confidential sources and cooperating witnesses. I have interviewed admitted drug traffickers, drug users, informants, cooperating defendants, and local, state, and federal law enforcement officers

regarding the manner in which drug traffickers distribute, obtain, finance, store, manufacture, transport, and distribute illegal drugs.

3. I am also familiar with the *modus operandi* of persons involved in the illicit distribution of controlled dangerous substances (“CDS”). I am aware that drug traffickers commonly use cellular telephones, including voice mail, push-to-talk (“PTT”), text messages, and encrypted communication applications in furtherance of their drug trafficking activities and to maintain contact with their suppliers, couriers, customers, and others involved in the transportation, storage, distribution, and marketing of CDS, and to discuss their plans to obtain, use, store and discard firearms associated with their narcotics trafficking activities. Based on my training and experience, I know that drug traffickers frequently have access to several wireless telephones, and that they periodically use newly acquired wireless telephones. I also know that narcotics traffickers frequently use wireless telephones subscribed to other persons and pre-paid wireless telephones that require the purchaser to provide little or no identifying information to purchase and utilize the phone, all of which is done in an effort to avoid detection and thwart the efforts of law enforcement.

4. I am also aware that drug traffickers often speak in vague, guarded, or coded language when discussing their illegal business in an effort to prevent detection from law enforcement. I am familiar with the terminology, “lingo,” and code words used in the drug trafficking trade, especially among organizations that engage in street-level distribution. Based on my training and experience, I am also aware that persons involved in illegal narcotics trafficking organizations frequently obtain, carry and use firearms to protect their drug trafficking

organization's ("DTO") objectives and often commit acts of violence in order to protect and further their drug trafficking activities.

5. I am one of the agents who has been involved in the investigation that is the subject of this Affidavit. I have personally participated in this investigation, and I am aware of the facts contained herein based upon my own participation in the investigation, my discussions with other law enforcement officers having knowledge of the case from their participation in the investigation, my review of investigative reports, my review of covert consensual recordings, physical surveillance, and other sources of information set forth herein.

6. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part. When describing conversations or text messages, unless otherwise noted, I have provided a summary of those communications. When providing transcriptions of conversations, I or another agent have listened to the conversation and provided a substantially verbatim transcript of the conversation accounting for the fact that the final transcripts of these conversations may contain minor edits for syntax or language, which would not bear on the overall substance or meaning of the conversation, as I have reported and transcribed it herein. For reference, I have abbreviated the names of speakers in transcribed conversations using initials or other means of identification. In some instances, I have included comments and abbreviations in brackets for clarification (i.e., "U/I" for unintelligible speech; "S/L" for sounds like). In addition, where amounts are set forth in this Affidavit, they are set forth as approximations. Similarly, dates and times are approximations, and should be read as on about, in about, or at about the date or time provided.

7. This Affidavit is submitted for the limited purpose of setting forth probable cause for the issuance of the requested criminal complaints and arrest warrants. For that reason, I have not included every fact known to me regarding this investigation. Rather, I have set forth only those facts which I believe are necessary to establish probable cause to support issuance of the requested criminal complaints and arrest warrants.

8. Based on the facts set forth in this Affidavit, there is probable cause to believe, and I do believe, that TYLER GOTTLIEB and CANDACE GOTTLIEB, from in or about March 2018 and continuing through in or about May 2018, in Camden County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and to possess with intent to distribute mixtures and substances containing detectable amounts of fentanyl and heroin, Schedule II and Schedule I controlled substances respectively, a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, and a marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and in violation of Title 21, United States Code, Section 846

9. TYLERT GOTTLIEB and CANDACE GOTTLIEB, have committed, and are presently committing, violations of Title 21, United States Code, Section 846 (Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances, including fentanyl, heroin, cocaine, and marijuana) from in or about March 2018 and continuing through in or about May 2018.

## II. PROBABLE CAUSE

10. I and other members of the FBI's SJVOGTF have been investigating the criminal activities of TYLER GOTTLIEB and CANDACE GOTTLIEB, both of whom reside in Cherry Hill, New Jersey at a residence identified herein as the SUBJECT PREMISES. TYLER GOTTLIEB came to the attention of law enforcement based on information indicating that TYLER GOTTLIEB is and has been engaged in the distribution of controlled substances, including but not limited to fentanyl, heroin, cocaine, and marijuana, and in unlawful possession of multiple firearms in connection with these drug trafficking activities. During the course of the investigation, I and other members of the SJVOGTF also determined that CANDACE GOTTLIEB is working closely with her son, TYLER GOTTLIEB, to unlawfully distribute controlled substances in and around Cherry Hill, New Jersey and elsewhere.

### March 19, 2018 Seizure of U.S. Currency and Suspected Heroin from Tyler Gottlieb at Philadelphia International Airport

11. On or about March 19, 2018, TYLER GOTTLIEB traveled to the Philadelphia International Airport in order to board a flight to California. While passing through security, members of the Transportation Security Administration ("TSA") conducted a routine inspection of TYLER GOTTLIEB's carry-on bag. Upon search, TSA security personnel found approximately \$51,000.50 in United States currency located inside TYLER GOTTLIEB's carry-on bag.

12. Thereafter, investigators with Homeland Security Investigations ("HSI") responded to assist TSA. Investigators with HSI subsequently learned that TYLER GOTTLIEB had also checked a luggage bag. Based upon this and other information, investigators with HSI applied for



and obtained a search warrant in the Eastern District of Pennsylvania, which authorized the search of the checked luggage bag and carry-on bag. Upon execution of the search warrant, investigators located approximately \$16,760.00 in additional cash, numerous bags containing suspected heroin, syringes, other drug paraphernalia, and three cellular telephones.<sup>1</sup>

**March 28, 2018 Controlled Purchase**

13. On or about March 28, 2018, in furtherance of the FBI's ongoing investigation into TYLER GOTTLIEB's suspected drug trafficking activities and unlawful possession of firearms in furtherance of those activities, investigators met with a registered Confidential Human Source ("CHS") for the purposes of conducting a controlled purchase of drugs and a firearm from Tyler GOTTLIEB.<sup>2</sup> While located at a secure meet location, investigators searched the CHS and the

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<sup>1</sup> HSI agents interviewed TYLER GOTTLIEB while he was at the airport on or about March 19, 2018. During the interview, TYLER GOTTLIEB initially claimed that he intended to meet friends in Los Angeles and then travel to Las Vegas, Nevada. TYLER GOTTLIEB stated that he intended to spend the money on gambling and partying. TYLER GOTTLIEB also stated to agents that he lived with his mother at the Subject Premises in Cherry Hill, New Jersey. Later, TYLER GOTTLIEB changed his story and informed HSI agents that his father could verify the validity of the currency. TYLER GOTTLIEB placed a call to an individual on his cellular telephone and permitted agents to speak with the individual, who represented himself to be TYLER GOTTLIEB's father. The individual stated to an agent that he had provided the money to his son, TYLER GOTTLIEB, in order to purchase property in California. Agents afforded the person on the phone the opportunity to travel to Philadelphia International Airport with documentation substantiating the source of the currency; the individual, however, refused. Thereafter, agents detained the currency pending further investigation. After learning that GOTTLIEB had also checked a bag – which he had denied when speaking to agents – HSI obtained authorization to search the luggage bag, upon which they located additional currency and suspected heroin, as set forth above.

<sup>2</sup> The CHS has been actively providing information and proactively cooperating with the FBI since November 2016. Prior to then, the CHS provided information and cooperation from February 2009 to November 2009. The CHS's criminal history includes convictions for firearms violations, conspiracy to defraud the United States, theft by deception, conspiracy, falsifying

CHS's vehicle and confirmed that the CHS was not in possession of money or contraband. At approximately 9:51 p.m., investigators equipped the CHS with a covert audio and video recording device as well as a live audio transmitter. Thereafter, the CHS travelled to the Subject Premises while under surveillance. After arriving, the CHS exited the CHS's vehicle and entered the residence located at the Subject Premises.

14. After entering the residence, the CHS engaged in conversation with TYLER GOTTLIEB about the CHS's interest in purchasing drugs and a firearm.<sup>3</sup> While speaking with the CHS, the CHS observed large quantities of cocaine in two sealed, clear plastic packages, several hundred pills which TYLER GOTTLIEB indicated contained fentanyl, and three stacks containing numerous individually packaged bags of suspected heroin.

15. During the conversation, which was captured on audio and video recording, TYLER GOTTLIEB stated to the CHS while referencing the two packages of suspected cocaine: "This is, these two, we weigh it in metrics and shit but, that is a half a bird, that's 500 grams." I know from my training and experience, that "a bird" is common drug code used by persons engaged in drug trafficking to refer to a kilogram (1000 grams) of cocaine. In response to the

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records, criminal contempt, conspiracy to commit forgery, and shoplifting. During the course of the CHS's cooperation with the FBI, the CHS's information has been determined to be accurate and reliable, and with respect to the investigation discussed in this Affidavit, has been corroborated through surveillance, covertly monitored and recorded meetings and calls, and text messages which have been examined by law enforcement. The CHS is presently cooperating for financial consideration.

<sup>3</sup> While inside the Subject Premises, the CHS also interacted with TYLER GOTTLIEB's mother, CANDACE GOTTLIEB and a male who also resided at the Subject Premises and who is an associate of GOTTLIEB. That male has since passed away due to a health condition.

CHS's request to purchase a quantity of cocaine, TYLER GOTTLIEB stated that the two packages had already been sold and were being held for another customer. TYLER GOTTLIEB later indicated that he could obtain cocaine for the CHS at a future time and discussed prices, quantities, and quality of cocaine available through his current, local source of supply. TYLER GOTTLIEB also discussed sources of supply in California from whom he indicated that he had obtained large quantities of cocaine in the past.

16. During the meeting, TYLER GOTTLIEB and the CHS also discussed counterfeit prescription opioid pills that TYLER GOTTLIEB had inside of the Subject Premises at the time. TYLER GOTTLIEB stated to the CHS that the pills were "perc 30s," which I know, based on my training and experience to be a reference to 30 milligram pills of Percocet, which is a controlled opioid substance available only by prescription. TYLER GOTTLIEB clarified, however, that the "perc 30s" were not real Percocet pills, but that everyone who had purchased them indicated that they were nonetheless of good quality.<sup>4</sup> TYLER GOTTLIEB and the CHS also discussed prices TYLER GOTTLIEB paid when obtaining and selling pills.

17. TYLER GOTTLIEB and the CHS also discussed firearms during the meeting. A portion of the recorded conversation is transcribed and set forth below:

TG: You can get a Glock fucking...

CHS: Hold up, you put, get the fuck out of here.

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<sup>4</sup> I know based on my training and experience in narcotics investigations, that illicit drug suppliers are increasingly selling counterfeit pills that appear to be Percocet and other types of branded prescription opioids based on the shape, color, and stamping, but which are in fact substitute substances containing synthetic opioids, such as fentanyl, and which are illegally manufactured by drug suppliers using pill presses obtained for unlawful purposes.

TG: I'm telling you, you can get a Glock, I can get you an AR-15 pistol, all that shit dawg. See the thing is, I'm not buying these guns put together.

CHS: Uh-huh

TG: I'm buying them in parts...

CHS: Parts...?

TG: And putting them together, piecing them together from different sites and shit.

CHS: So how many sites you need?

TG: No, there's dozens of sites.

CHS: No what I'm saying to you is...

TG: Addresses.

CHS: How many addresses you need?

TG: Umm.

CHS: How many can come to an address?

TG: As many as you want, you just don't want to make it...

CHS: I know, that's what I'm saying.

TG: Couple at a time.

CHS: What's a safe number? Like 2, 3?

TG: Yeah.

CHS: At a time?

TG: Yup. They have options on there to buy a hundred AR-15 lower receivers. Who the fuck buys a hundred AR-15 lower receivers? At the bottom it's strictly like, no FFL, at the bottom like, these sites like pop up...

CHS: Uh-huh.

18. I know, based on my training and experience, that "Glock" is the name of a manufacturer of handguns and that an "AR-15" is a type of semi-automatic firearm.<sup>5</sup>

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<sup>5</sup> The CHS informed investigators that TYLER GOTTLIEB has a safe within the Subject Premises, which the CHS believes TYLER GOTTLIEB uses to store firearms and drug proceeds.

19. Toward the end of the meeting between TYLER GOTTLIEB and the CHS, TYLER GOTTLIEB explained to the CHS that TYLER GOTTLIEB intended to travel to California and planned to leave soon. TYLER GOTTLIEB stated: “Trying to leave right now. I’m literally dropping this white off, grabbing the bread from it, and bags are already in the living room packed.” I know, based on my training and experience, that “white” is a coded term commonly used by persons engaged in drug trafficking to refer to powder cocaine and that “bread” is a coded term commonly used to refer to cash.

20. Before departing, the CHS informed TYLER GOTTLIEB that the CHS was interested in potentially purchasing pills from TYLER GOTTLIEB prior to TYLER GOTTLIEB’s planned departure. TYLER GOTTLIEB stated that he would be available in approximately an hour. TYLER GOTTLIEB also provided the CHS with two bags containing suspected heroin and one of the pills which he had previously referred to as “Perc 30s” as samples. The CHS indicated that the CHS wanted to test the quality of the drugs and that the CHS would contact TYLER GOTTLIEB soon in order to discuss purchasing two-hundred (200) pills from TYLER GOTTLIEB later in the evening.

21. TYLER GOTTLIEB provided the CHS the telephone number (267) 385-1596<sup>6</sup> and stated that this number was the number for his cellular telephone. TYLER GOTTLIEB also

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<sup>6</sup> The telephone number (267) 385-1596 is subscribed to Timothy Gottie, with an address of 3618 Tudor St. Philadelphia, PA 19136. I believe TYLER GOTTLIEB used a fictitious name and address derived from his actual name and a prior address when obtaining the cellular telephone associated with the telephone number (267) 385-1596. The name “Timothy Gottie” bears the same initials as TYLER GOTTLIEB. In addition, the address 3618 Tudor St. Philadelphia, PA 19136 is a non-existent location that, if an actual address, would be approximately two blocks away from a

directed the CHS to download an application for the CHS's cellular telephone called "Signal" so that the CHS could communicate securely with TYLER GOTTLIEB using the application rather than traditional calling and texting methods.<sup>7</sup>

22. Thereafter, the CHS left the Subject Premises and drove back to a secure meet location while under surveillance. Once back at the secure meet location, the CHS turned over to investigators one (1) white colored counterfeit pill bearing a stamp "M" and two (2) bags of suspected heroin, both of which were stamped with an image of "Felix the Cat."<sup>8</sup> Testing by a Drug Enforcement Administration ("DEA") laboratory has since confirmed that the single white colored pill bearing a stamp "M" contained fentanyl and heroin. The two bags of heroin stamped "Felix the Cat" have been sent to a DEA laboratory for testing; results have not yet been received.

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former address – 3414 Tudor Street, Philadelphia, PA 19136 – which is associated with an expired Pennsylvania Driver's license TYLER GOTTLIEB previously obtained. Based on public deed information, it also appears that TYLER GOTTLIEB owns or owned a property located at 3414 Tudor Street, Philadelphia, PA 19136. Addresses on Tudor Street appear to stop at 3598; there does not appear to be an actual location bearing the address 3618 Tudor St. Philadelphia, PA.

<sup>7</sup> The CHS has since downloaded the "Signal" application onto the CHS's cellular telephone. According to online information, "Signal" is touted as a secure communication application which allows users to send text messages and make calls using an advanced encryption protocol. TYLER GOTTLIEB and the CHS have since communicated on multiple occasions using the "Signal" application. In addition, TYLER GOTTLIEB has sent the CHS pictures which clearly show TYLER GOTTLIEB within. In one such picture, TYLER GOTTLIEB is posing in front of an indoor marijuana grow. Another photograph shows TYLER GOTTLIEB posing with a firearm that appears to be a mini-Uzi. TYLER GOTTLIEB also sent the CHS photographs of three types of pressed pills.

<sup>8</sup> "Felix the Cat" is a popular animal cartoon character.

23. Later in the evening on March 28, 2018 at approximately 11:00 p.m., while at the secure meet location, agents directed the CHS to return to the Subject Premises in order to purchase two-hundred (200) of the counterfeit prescription opioid pills TYLER GOTTLIEB had described as “Perc 30s.” Investigators again searched the CHS and the CHS’s vehicle and confirmed that the CHS was not in possession of money or contraband.

24. At approximately 11:24 p.m., investigators equipped the CHS with a covert audio and video recording device as well as a live audio transmitter. Investigators also provided the CHS with \$3,000 of FBI evidence funds in order to purchase counterfeit pills from TYLER GOTTLIEB. Thereafter, the CHS travelled to the Subject Premises while under surveillance. While on the way, the CHS attempted to make contact with TYLER GOTTLIEB using the telephone number TYLER GOTTLIEB had provided the CHS. TYLER GOTTLIEB did not answer. The CHS then called the associate<sup>9</sup> of TYLER GOTTLIEB’s who, at the time, resided with TYLER GOTTLIEB and CANDACE GOTTLIEB at the Subject Premises. The associate informed the CHS that TYLER GOTTLIEB was present at the residence. After arriving at the Subject Premises, the CHS exited the CHS’s vehicle and entered the Subject Premises.

25. Once inside the Subject Premises, the CHS engaged TYLER GOTTLIEB in further discussion about CHS’s interest in purchasing pills and a firearm. The CHS stated to TYLER GOTTLIEB that the CHS wanted to purchase “the whole two,” referring to two-hundred (200) of the counterfeit pills TYLER GOTTLIEB had discussed with the CHS during the earlier meeting.

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<sup>9</sup> This is the male associate referenced *supra* in note four who has since passed away.



TYLER GOTTLIEB agreed to sell the CHS two-hundred (200) of the pills at a price of \$15 per pill, for a total of \$3,000. The CHS provided TYLER GOTTLIEB with \$3,000 in FBI evidence funds. In exchange, TYLER GOTTLIEB counted out approximately two-hundred (200) counterfeit pills and provided them to the CHS. During the exchange, the CHS asked TYLER GOTTLIEB, “This is the same batch you gave me that sample from right?,” to which TYLER GOTTLIEB responded, “Yes.”<sup>10</sup> As set forth in the transcribed excerpt below, TYLER GOTTLIEB explained:

TG: When I get it, we don’t get different batches. I got homies with pill presses. We get the fentanyl. We get it by the key, we press them. Same thing with the bars but that’s in Canada. It all started offline and then the guy went offline and stopped going offline because the orders got so big. But we just had, he just had almost a million dollars’ worth of bars, well seven, almost eight hundred thousand bars seized.

CHS: Oooh.

TG: Yeah, I got twenty-thousand myself seized.

CHS: Oooh.

TG: I know, fuck it. But it was in a dead person’s name, in a different address. It just hurts me financially.

26. Thereafter, TYLER GOTTLIEB and the CHS discussed firearms. At one point during the conversation, TYLER GOTTLIEB retrieved a revolver from inside the Subject Premises, which he indicated was a .22 caliber revolver and remarked: “This jawn right here. This jawn right here, believe it or not, has saved my ass many times. It doesn’t even shoot longs, it shoots shorts...” TYLER GOTTLIEB provided the .22 caliber revolver to the CHS and told the

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<sup>10</sup> The CHS was referring to the single counterfeit pill, stamped “M,” which TYLER GOTTLIEB had provided to the CHS as a sample earlier in the evening.



CHS he would loan the revolver to the CHS. TYLER GOTTLIEB told the CHS, "I'm telling you, that twenty two is your best shot. It holds the shells. You don't want to be picking up shells." Based on my training and experience, I know that persons who obtain firearms for unlawful purposes sometimes prefer to obtain and use revolvers because the shell casings are not ejected from the firearm and left behind at the scene, which thwarts law enforcement's ability to conduct ballistic testing on the spent shell casings and may reduce the chances of the shooter being apprehended.

27. Later, TYLER GOTTLIEB retrieved another handgun, which he described as a Glock Model 22, and a thirty (30)-round magazine. The CHS asked if the CHS could purchase the Glock Model 22. TYLER GOTTLIEB stated that the CHS could not because it had been recently purchased and not yet reported stolen. TYLER GOTTLIEB remarked, "It's not um, it's not reported stolen yet. If you shot somebody with it, that's legally registered to somebody." I know based on my training and experience, that persons engaged in drug trafficking and other criminal activities often unlawfully obtain handguns using straw purchasers who legally purchase a firearm, sell the firearm to an undisclosed third-party, and then report the firearm as stolen in order to conceal the unlawful transfer.

28. Following the conclusion of the meeting, the CHS returned to a secure meet location. Once there, the CHS provided investigators two-hundred (200) white colored pills, each bearing a stamp "M." The CHS also provided investigators with a loaded .22 caliber revolver. Investigators retrieved the covert recording devices from the CHS and searched the CHS for other contraband. They located none. Testing by a Drug Enforcement Administration ("DEA")

laboratory has since confirmed that the two-hundred (200) white colored pill bearing a stamp “M” contained fentanyl and heroin.

**Tyler Gottlieb Leaves for Trip to Western State to Secure Additional Supplies of Controlled Substances**

29. In April 2018, at some point following the March 28, 2018 controlled purchase described above, TYLER GOTTLIEB left New Jersey and travelled to an area in the western part of the United States. Investigators believe, based on statements made to the CHS, that TYLER GOTTLIEB temporarily travelled to California or Arizona for the purpose of establishing additional sources of supply for controlled substances and in order to grow marijuana for the purpose of sending to New Jersey for distribution within the state. Based on recent information, I and other investigators believe TYLER GOTTLIEB is presently located in the vicinity of Anza, California.

30. As described in this Affidavit, TYLER GOTTLIEB and the CHS have communicated on multiple occasions via (267) 385-1596 and the “Signal” application believed to be present on the cellular telephone assigned telephone number (267) 385-1596, since TYLER GOTTLIEB departed from New Jersey. During those conversations, TYLER GOTTLIEB has stated, *inter alia*, that TYLER GOTTLIEB is mailing controlled substances back to New Jersey. In addition, as set forth *supra* note elsewhere in this Affidavit, TYLER GOTTLIEB has sent photographs of controlled substances, including counterfeit prescription pills believed to contain fentanyl and heroin, as well as a crop of marijuana, and also a photograph of TYLER GOTTLIEB holding a firearm. TYLER GOTTLIEB has also directed and facilitated from afar the distribution

of controlled substances to the CHS in New Jersey and Pennsylvania, including cocaine, marijuana, and counterfeit prescription pills believed to contain fentanyl and heroin, as described in greater detail below, using the telephone assigned telephone number (267) 385-1596.

**May 1, 2018 Controlled Purchase**

31. On or about April 30, 2018, at approximately 8:30 p.m., the CHS met with investigators for the purpose of placing a consensually recorded call to TYLER GOTTLIEB to discuss the CHS's interest in purchasing a quantity of cocaine. During the call, which took place using the "Signal" application, TYLER GOTTLIEB explained to the CHS that he was presently growing a crop of marijuana, which he wanted to harvest before returning home to New Jersey. The CHS also inquired about obtaining a quantity of cocaine from TYLER GOTTLIEB's local source of supply. TYLER GOTTLIEB informed the CHS that he would make arrangements with his "white connect" to sell the CHS cocaine. TYLER GOTTLIEB indicated that the supplier was the same person who had provided the cocaine to TYLER GOTTLIEB which the CHS had observed within the Subject Premises on March 26, 2018. The CHS stated that the CHS wanted to purchase an ounce of cocaine from the supplier in order to test its quality. During the call, TYLER GOTTLIEB stated that he also had "30s" similar to the counterfeit prescription Percocet pills he had provided to the CHS before, which he was sending home for distribution. At one point, TYLER GOTTLIEB asked if he could call the CHS back. During a subsequent consensually recorded call, which occurred a moment later also using the "Signal" application, the CHS and TYLER GOTTLIEB continued to discuss the CHS's interest in purchasing an ounce of cocaine. TYLER GOTTLIEB indicated that he would have to check into pricing, because he usually

purchases higher quantities from the source. TYLER GOTTLIEB further stated that the source had two grades of cocaine – an “A+” and a “B+” grade. TYLER GOTTLIEB described the “A+” as mostly solid and the “B+” as powder. I know, based on my training and experience, that “white” is common drug code for cocaine. I also know that high purity cocaine often comes in a solid chunk form that is broken off of compressed kilogram bricks, whereas lower purity cocaine is often ground into powder and combined with mixing agents in order to reduce the potency and increase quantities available for distribution.

32. On or about April 30, 2018, at approximately 9:04 p.m., TYLER GOTTLIEB contacted the CHS via text message through the “Signal” application that the CHS had installed on the CHS’s own cellular telephone at the request of TYLER GOTTLIEB. TYLER GOTTLIEB and the CHS engaged in the following text message conversation through the “Signal” application, which related to the CHS’s expressed interest in obtaining a quantity of cocaine from TYLER GOTTLIEB’s local source of supply:

TG: I gave him your number he’s got the A+ he says if you’re only grabbing one the best you could be is 1300.

TG: If you were to grab two he could do 2400

CHS: Sorry bad Signal.

CHS: All right if I do the one, we can make up the difference on the big one.

TG: Same as b4 top of lone A+++ he said he was going to give u a call yo try n meet u asap bc he doesn’t stay out too late either cuz he’s got kids sohe normally wraps it up like 12:30 at night.

CHS: Ok I will keep you up-to-date of all transactions. What about the other stuff

33. Based on my training and experience, and information known to me from this investigation, I believe that in the text message exchange transcribed above, TYLER GOTTLIEB

explained to the CHS the terms of a contemplated transaction between the CHS and TYLER GOTTLIEB's local cocaine supplier.

34. Thereafter, at approximately 8:58 p.m., TYLER GOTTLIEB sent an SMS text message to the CHS using the telephone assigned telephone number (267) 385-1596, which contained contact information for his local cocaine source of supply. The contact featured the name "Ching." Following receipt of this information, the CHS placed a consensually recorded call to "Ching." A male answered. During the ensuing conversation, the CHS asked whether the source of supply had spoken to "Tyler." The male confirmed that he had. The CHS and the male then discussed meeting and agreed to do so in the afternoon the following day. The CHS stated that the CHS would call the male then.

35. On or about April 30, 2018, at approximately 9:36 p.m., TYLER GOTTLIEB contacted the CHS via text message through the "Signal" application on his/her cell phone. TYLER GOTTLIEB asked "and did u get ahold of ching hes expecting your call." Based on my training, experience, and the preceding communications described in this Affidavit, I believe TYLER GOTTLIEB contacted the CHS in order to confirm that the CHS had reached the source of supply to discuss purchasing an ounce of cocaine.

36. The following day, on May 1, 2018, at approximately 8:20 p.m., investigators met with CHS for the purpose of conducting a controlled purchase of cocaine from the male who TYLER GOTTLIEB referred to as "Ching". While located at the secure meet location, investigators searched the CHS and the CHS's vehicle and confirmed that the CHS was not in possession of money or contraband. At approximately 8:30 p.m., investigators equipped the CHS

with two covert audio and video recording devices as well as a live audio transmitter. Thereafter, the CHS travelled to Home Depot in the vicinity of Aramingo Avenue and Castor Avenue in Philadelphia, Pennsylvania while under surveillance. While travelling to the location, the CHS and TYLER GOTTLIEB spoke via cellular telephone using the "Signal" application. The conversation was consensually recorded by the CHS using covert recording devices law enforcement had provided to the CHS at the start of the operation. During the call, TYLER GOTTLIEB indicated that he had spoken with his supplier and arranged for the supplier to meet with the CHS in order for the CHS to obtain an ounce of cocaine. TYLER GOTTLIEB also provided the CHS directions to the Home Depot location where the source intended to meet the CHS.

37. After arriving at the Home Depot, the CHS parked and waited in the parking lot inside of her/his vehicle. At approximately 9:11 p.m., a male driving a light-colored SUV arrived at the Home Depot and parked several parking spaces from the CHS's vehicle. The CHS exited his/her vehicle and entered the light-colored SUV for approximately one minute, during which time the CHS provided the male \$1,300 in FBI evidence funds and, in exchange, the male provided the CHS a plastic zip-lock bag containing a white, chunky substance believed to be one (1) ounce of cocaine.

38. Thereafter, the CHS travelled back to a secure meet location in New Jersey while under surveillance. The CHS provided investigators with a plastic bag containing a white, chunky substance which, based on my training and experience, I recognized to be cocaine. The appearance of the cocaine was consistent with the description of the "A+" variety of cocaine TYLER

GOTTLIEB had described during the consensually recorded call with the CHS on April 30, 2018, described above. Investigators conducted a field test of the suspected cocaine, and it tested positive for the presence of cocaine. The cocaine has since been sent to a DEA laboratory for further testing.

**May 23, 2018 Controlled Purchase**

39. On May 23, 2018, at approximately 9:00 p.m., investigators met with the CHS for the purposes of conducting a controlled purchase of pills containing suspected fentanyl and heroin from CANDACE GOTTLIEB. While at the meet location, the CHS placed a consensually recorded telephone call to CANDACE GOTTLIEB at a telephone number ending in 0218. The CHS and CANDACE GOTTLIEB engaged in the following conversation:

CB: Hey babe.

CHS: Hey.

CB: When do you, when will you coming over?

CHS: I was headed over now.

CB: Oh, ok, well, can you give me a little bit? I gotta count out.

CHS: Ok, how much time do you need?

CB: Ah, about twenty minutes.

CHS: Ok, cool. Tell T...

CB: I think, ok...

CHS: Tell T I said to call me. I was just trying to reach him and I couldn't. Like he, I spoke with him...

CB: Alright, he's having trouble with his phone out there. Try, ah, try calling him again.

CHS: Ok. Alright.

CB: Alright, bye.

40. Based on my training and experience, the conversation described above, and information known to me from this investigation, I believe that during this call CANDACE GOTTLIEB explained that she needed additional time to count out the pills the CHS intended to purchase. Furthermore, I believe that when CANDACE GOTTLIEB and the CHS referenced “T,” they both were referring to TYLER GOTTLIEB.

41. Also while at the meet location in the presence of investigators, the CHS placed a consensually recorded call to TYLER GOTTLIEB using the “Signal” application on the CHS’s cellular telephone. During this telephone call, TYLER GOTTLIEB and the CHS engaged in a consensually recorded conversation, a portion of which is transcribed below:

TG: Yo

CHS: Yo, what’s up T?

TG: What’s up? My mom is counting those things out for you now.

CHS: Ok, alright.

TG: Six-hundred of them, ok?

CHS: Now, now you’re giving me three different kinds?

TG: Yes, I’m giving you two-hundred of each, instead of, you know, five-hundred of one. I’m gonna give you two-hundred of each kind so your people can see all three kinds at once.

CHS: So what do you, what, which ones you got again?

TG: They’re all the same. They’re all the same. The same ones, I sent you the picture.<sup>11</sup>

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<sup>11</sup> As noted above, on April 20, 2018 TYLER GOTTLIEB sent the CHS via the “Signal” application a text message containing a photograph of a handful of pressed pills bearing three different varieties of stamps, including “V,” “K 9,” and “A 215.” These stamps appear to correspond to prescription opioids. Based on my training and experience, I know that counterfeit prescription opioids containing fentanyl, heroin, and other illicit controlled substances are being trafficked with increasing frequency.



CHS: Ok, cool.

TG: The K. The K-9's. The A215's, and the um, V's.

CHS: Alright cool.

TG: Now I think, the most, the ones I got the most of are the V's right now. No, no, not the V's, the K-9's.

42. Later, while still located at a secure meet location, investigators searched the CHS and the CHS's vehicle and confirmed that the CHS was not in possession of money or contraband. At approximately 9:24 p.m., investigators equipped the CHS with two covert audio and video recording devices as well as a live audio transmitter. Thereafter, the CHS travelled to the Subject Premises while under surveillance. After arriving, the CHS exited the CHS's vehicle and entered the residence located at the Subject Premises.

43. Once inside the Subject Premises, the CHS met with CANDACE GOTTLIEB, who is clearly visible in covertly captured video, which I have since reviewed. During the meeting, the CHS and CANDACE GOTTLIEB discussed the six-hundred (600) counterfeit prescription pills containing suspected fentanyl and heroin, which the CHS intended to obtain from CANDACE GOTTLIEB at the direction of TYLER GOTTLIEB. TYLER GOTTLIEB had previously agreed with the CHS that CANDACE GOTTLIEB would provide the six-hundred (600) counterfeit pills to the CHS on loan, with the expectation that the CHS would pay CANDACE GOTTLIEB a total of \$13 per pill, for a total of \$7,800 on a future date. I know, based on my training and experience, that this is a common practice called "fronting," which is often utilized among trusted confederates involved in drug trafficking activities.

44. During the meeting inside the Subject Premises, CANDACE GOTTLIEB counted out three varieties of pressed pills in front of the CHS. In addition, while the CHS was present, the CHS observed large heat sealed bags containing suspected marijuana. At one point during the meeting, CANDACE GOTTLIEB stated to the CHS that she had twenty (20) pounds of marijuana inside of the Subject Premises, which she had packaged for further resale. After CANDACE GOTTLIEB counted the counterfeit pills, the CHS and CANDACE GOTTLIEB engaged in the following conversation, a portion of which is transcribed below:

CG: Ok, two hundred here [U/I]. This is a pain in the ass. I thought I could count them a lot faster than this. It took me three hours to get through twenty pounds of weed, re-bag it [S/L]. But I did fucking great.

CHS: You did great.

CG: Yeah, [S/L] the pounds are like nice and flat, you know?

CHS: Good.

CG: You know?

CHS: You weighed it right?

CG: [S/L] Oh yeah.

CHS: You made sure the weight was right...

CG: Yeah, every time it comes in, every bag that comes in I re-weigh it...

CHS: Ok.

CG: And then I add a gram or two to it.

CHS: Oh, ok.

CG: All the stuff that comes in [U/I].

CHS: Ok.

CG: [U/I]

CHS: Hmmhm.

CG: [U/I]

CHS: Because you know, I was gonna say, you better make sure you weigh it when you get it because if it's not being sent here, it's sent somewhere else, you know they'll skim from you.

CG: No, they can't because no one is allowed to open anything they get sent to them. they come here.

CHS: Ok.

CG: They gotta bring it to me closed.

CHS: Ok.

CG: He's awfully lucky he's got a mom that does this shit for him.

45. Based on my training and experience, statements by CANDACE GOTTLIEB and TYLER GOTTLIEB, and other and information obtained during the investigation, I believe that TYLER GOTTLIEB is presently sending several different types of controlled substances from a state in the western part of the United States to the South Jersey area through the mail. Furthermore, based on the conversation described above and other information from the investigation, I believe TYLER GOTTLIEB is sending packages containing controlled substances, including counterfeit pills containing fentanyl and heroin, as well as packages containing marijuana, to persons residing at other locations in New Jersey in order to limit the likelihood of detection and seizure by law enforcement. I know, based on my training and experience, that this is a common practice employed by persons engaged in drug trafficking. Moreover, I believe, based on the conversation excerpted above, that persons receiving controlled substances mailed by TYLER GOTTLIEB are thereafter transporting those controlled substances to the Subject Premises for processing and resale by CANDACE GOTTLIEB.

46. During the recorded meeting on May 22, 2018, the CHS observed a clear plastic bag on a couch near to where CANDACE GOTTLIEB was counting counterfeit pills intended for

sale to the CHS. The clear plastic bag, which is visible in the covert video recording captured during the meeting, contained a number of smaller bags each filled with pills. Upon observing the bag containing smaller bags with pills, the CHS asked CANDACE GOTTLIEB about the bag. A portion of the exchange that followed is transcribed below:

CHS: What do you got? Like a thousand of them? Five-thousand? That's a lot. I wish I could get them all off of you.

CB: [U/I] [S/L] Try thirty-thousand.

CHS: Thirty-thousand?

CB: Probably, about that.

47. Based on the conversation excerpted above, my training and experience, and my own review of covertly recorded video from the meeting, I believe that on May 22, 2018, CANDACE GOTTLIEB was in possession inside the Subject Premises of thousands of pressed counterfeit prescription pills containing fentanyl and heroin. Based on communications between the CHS and TYLER GOTTLIEB, I also believe that TYLER GOTTLIEB sent these pills to a location in New Jersey, and that upon receipt, they were transported to the Subject Premises for processing and redistribution by CANDACE GOTTLIEB.

48. After providing the approximately six-hundred (600) pressed counterfeit prescription pills to the CHS, CANDACE GOTTLIEB offered the CHS a sample of the marijuana she had present inside of the Subject Premises. CANDACE GOTTLIEB took the CHS to a lower level in the house, and in the presence of the CHS, weighed out a small portion of marijuana on a scale. While weighing the marijuana, CANDACE GOTTLIEB explained to the CHS that she ensured all drugs that are sold and all payments that are received are carefully logged in records

she retains inside of the Subject Premises. After weighing a sample of suspected marijuana, CANDACE GOTTLIEB provided it to the CHS.

49. During the meeting, the CHS also asked CANDACE GOTTLIEB whether CANDACE GOTTLIEB could supply the CHS with additional cocaine. CANDACE GOTTLIEB stated that she could sell cocaine to the CHS. She advised that she would inquire about prices and quantities and follow up with the CHS.

50. Following the conclusion of the meeting, the CHS returned to a secure meet location while under surveillance in order to meet with investigators. Once at the secure location, the CHS provided investigators with six-hundred (602) counterfeit prescription pills of different shades of blue, bearing three different stamps corresponding to stamps featured on prescription opioids.<sup>12</sup> The CHS also provided investigators a small quantity of green, leafy plant substance, which I recognized based on sight and smell, as well as my training and experience, to be marijuana. Investigators retrieved the covert recording devices from the CHS and searched the CHS for other contraband. They located none. Investigators did not field test the pills due to safety concerns over the presence of fentanyl.<sup>13</sup> The pills and suspected marijuana have since been sent to a DEA laboratory for further testing and analysis. Results are pending.

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<sup>12</sup> I believe CANDACE GOTTLIEB inadvertently provided two (2) extra pills to the CHS.

<sup>13</sup> As noted above, the two-hundred counterfeit pills TYLER GOTTLIEB sold to the CHS on March 26, 2018, have since been confirmed to contain fentanyl and heroin based on testing by a DEA laboratory.

**May 25, 2018 Acquisition of Sample of Cocaine**

51. Following the meeting on May 22, 2018, CANDACE GOTTLIEB contacted the CHS several times and indicated that she had obtained a sample of cocaine for the CHS. The CHS agreed to travel to the Subject Premises in order to obtain the sample so that the CHS could assess the quality of the cocaine and determine whether the CHS would be interested in purchasing a larger quantity.

52. On or about May 25, 2018, the CHS met with investigators at a secure meet location. Investigators searched the CHS for contraband and confirmed that the CHS had none. Investigators also equipped the CHS with covert video and audio recording devices. Thereafter, the CHS travelled to the Subject Premises while under surveillance. After arriving, the CHS entered the Subject Premises and met with CANDACE GOTTLIEB inside the residence. While inside the residence, CANDACE GOTTLIEB provided the CHS a plastic bag containing what she described as two grams of "White Widow," which contained a green, leafy substance, as an additional sample of the marijuana she had available for sale. CANDACE GOTTLIEB also provided the CHS with a plastic bag containing a white, chunky substance that she told the CHS was a sample of the cocaine she could obtain for the CHS. Afterwards, the CHS and CANDACE GOTTLIEB discussed possible plans for the CHS to return to the Subject Premises in order to purchase cocaine and more of the counterfeit prescription pills CANDACE GOTTLIEB had previously provided to the CHS.

53. Following the conclusion of the meeting, the CHS traveled back to the secure meet location while under surveillance. Once there, the CHS provided investigators a plastic bag

containing a green, leafy substance as well as a plastic bag containing a small amount of white, chunky substance. Based on my training and experience as well as statements made by CANDACE GOTTLIEB during the meeting described above, I believe that the green, leafy substance was marijuana and the white, chunky substance was cocaine. Investigators field tested the suspected cocaine, and it tested positive for presence of cocaine. Both the suspected marijuana and the cocaine have been sent to a DEA laboratory for further testing.

**May 29, 2018 Communications with Tyler Gottlieb**

54. On or about May 29, 2018, investigators met with the CHS at a secure location in order to place consensually recorded calls to TYLER GOTTLIEB on the cellular telephone assigned telephone number (267) 385-1596. While in the presence of investigators, the CHS placed a call to TYLER GOTTLIEB on the cellular telephone assigned telephone number (267) 385-1596. TYLER GOTTLIEB answered the call. Part way into the conversation, which was not recorded due to a malfunction with the recording device, TYLER GOTTLIEB asked the CHS to call him back using the “Signal” application. The CHS then called TYLER GOTTLIEB using the application. TYLER GOTTLIEB answered and the CHS and TYLER GOTTLIEB continued the conversation, which also was not recorded due to a malfunction with the recording device. During the conversation, TYLER GOTTLIEB offered to send the CHS thirty (30) pounds of marijuana through the mail.

55. A short time later, while the CHS was still in the presence of investigators, the CHS placed a third call to TYLER GOTTLIEB using the “Signal” application in order to continue discussing the possibility of TYLER GOTTLIEB sending the CHS marijuana. TYLER

GOTTLIEB did not answer, so the CHS proceeded to place another call to TYLER GOTTLIEB on the cellular telephone assigned telephone number (267) 385-1596, which was successfully recorded. TYLER GOTTLIEB answered the phone and informed the CHS that he had been on another call trying to get “addresses.” The CHS stated to TYLER GOTTLIEB that the CHS would call TYLER GOTTLIEB back in a moment again on the “Signal” application. The CHS then placed a consensually recorded call to TYLER GOTTLIEB using the “Signal” application, which TYLER GOTTLIEB answered. During the ensuing recorded call, the CHS expressed concern that law enforcement might detect the CHS’s illegal activities if TYLER GOTTLIEB were to send the CHS a package containing marijuana. TYLER GOTTLIEB proceeded to describe his procedures for vacuum sealing marijuana and cleaning the packages to ensure that law enforcement would not be able to determine the illicit contents of the packages. During the conversation, the CHS agreed to provide addresses to TYLER GOTTLIEB, and TYLER GOTTLIEB agreed to send the CHS packages of marijuana in the mail. TYLER GOTTLIEB instructed the CHS that the CHS would also need to mail payment to him at an address he would provide to the CHS.

56. Thereafter, at the direction of investigators, the CHS sent TYLER GOTTLIEB via a text messages in the “Signal” application two addresses for Post Office locations in Camden, New Jersey and Cherry Hill, New Jersey.

57. On May 30, 2018, TYLER GOTTLIEB sent the CHS via a text message in the “Signal” application a photograph of a receipt containing tracking information for two (2) packages destined for a location corresponding to Camden Post Office address provided by the CHS. TYLER GOTTLIEB also informed the CHS that he would send two additional packages to



the Cherry Hill Post Office address in the near future. TYLER GOTTLIEB also sent an a P.O. Box address for a location in Anza, California where he wanted the CHS to send payment for the packages of marijuana.

### **III. SEALING**

58. Because this application and Affidavit pertain to an ongoing criminal investigation, and because disclosure of the information contained herein as well a disclosure of the complaints and warrants being requested may compromise the investigation and increase the risk of harm for law enforcement officers who are responsible for conducting the arrests, I request that this Affidavit, the criminal complaints, the arrest warrants, and all related documents be filed under seal until further order of the Court, except for a copy of the arrest warrants to be served at the time of execution.

### **IV. CONCLUSION**

59. Wherefore, your Affiant submits that there is probable cause to believe that the TYLER GOTTLIEB and CANDACE GOTTLIEB, from in or about March 2018 and continuing through in or about May 2018, in Camden County, in the District of New Jersey and elsewhere, did knowingly and intentionally conspire and agree with each other and with others, known and unknown, to distribute and to possess with intent to distribute mixtures and substances containing detectable amounts of fentanyl and heroin, Schedule II and Schedule I controlled substances respectively, a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, and a marijuana, a Schedule I controlled substance, contrary to Title 21,

United States Code, Sections 841(a)(1) and 841(b)(1)(C), and in violation of Title 21, United States Code, Section 846.

60. The information contained in this Affidavit is known to be true and correct to the best of my knowledge, information and belief.