

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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**SEE ATTACHMENT A**

**SEE ATTACHMENT B**

Cyril Perovic

December 10, 2020 at District of New Jersey  
Date County and State

Hon. Leida Dunn Watson

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Distribute and Possess with Intent to Distribute  
Methamphetamine)

From at least in or around November 2020 through on or about  
December 10, 2020, in the District of New Jersey and elsewhere, the  
defendant,

**GLEN TURNER,**

did knowingly and intentionally conspire and agree with others to distribute and  
possess with intent to distribute 50 grams or more of methamphetamine, its  
salts, isomers, or salts of its isomers, contrary to Title 21, United States Code,  
Sections 841(a)(1) and 841(b)(1)(A).

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

## **ATTACHMENT B**

I, Cyril Pereira, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”). 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. Law enforcement has been investigating the Pagan’s Motorcycle Club—an Outlaw Motorcycle Gang that operates in New Jersey, Pennsylvania, and elsewhere (the “Pagans”). During the investigation, law enforcement learned that Glen Turner (“TURNER”) is a member of the Pagans who distributes methamphetamine.

2. Through the use of investigative techniques including, but not limited to, physical and fixed surveillance and the substance of lawfully intercepted communications, law enforcement learned that TURNER conspired and agreed with at least one co-conspirator to distribute methamphetamine, in excess of 50 grams, in the State of New Jersey.

3. Based on information acquired during the investigation, law enforcement obtained a warrant to search TURNER’s residence on or about December 8, 2020.

4. During the search of TURNER’s residence on or about December 10, 2020, law enforcement recovered, among other items, approximately four hundred and fifty (450) grams of a substance that field-tested presumptively positive for the presence of methamphetamine.