UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	**CRIMINAL COMPLAINT**
	:	
v.	:	The Honorable James B. Clark III
	:	
SEAN L. SCOTT, SR.,	:	Mag. No. 16-3004
a/k/a "Ali Rock"	:	
	:	**FILED UNDER SEAL**

I, 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 Special Agent with the Federal Bureau of Investigation and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Special Agent Rachel Kolvek
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
February 8, 2016 at Newark, New Jersey

THE HONORABLE JAMES B. CLARK III
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

Count One
(Distribution, and Possession with Intent to Distribute, Cocaine Base)

On or about February 4, 2016, in Essex County, in the District of New Jersey and elsewhere, defendant

SEAN L. SCOTT, SR.,
"Ali Rock,"

did knowingly and intentionally distribute, and possess with intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

ATTACHMENT B

I, Rachel Kolvek, have been a Special Agent with the Federal Bureau of Investigation ("FBI") for more than 14 years, and I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge and on information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly-available information relating to the defendant; and (c) my review of audio recordings and photographs. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part, and the content of statements and meetings are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared officers.

THE NEW JERSEY GRAPE STREET CRIPS

1. The Grape Street Crips are a nationwide street gang, founded in Los Angeles, California, and operating throughout the United States, including in the District of New Jersey (hereinafter, the "NJ Grape Street Crips" or the "Enterprise").

2. Members and associates of the NJ Grape Street Crips are united in their common goals of preserving, protecting, promoting, and expanding the power and authority of the NJ Grape Street Crips, and of increasing respect for, and enriching, members and associates of the Enterprise.

MANNER & MEANS OF THE ENTERPRISE

3. The NJ Grape Street Crips routinely engage in acts of intimidation and violence—including murder, assault, and witness intimidation—to avenge attacks or perceived slights against other members of the Enterprise; to punish members who have been disloyal; to retaliate against rivals; to silence individuals who are perceived to be cooperating with law enforcement against the NJ Grape Street Crips; and to maintain and enhance the reputation of the NJ Grape Street Crips for the purpose of protecting and otherwise assisting their drug-trafficking business.

4. During the course of this investigation, fourteen senior members of the NJ Grape Street Crips have been charged by a federal grand jury with, among other things, racketeering offenses, violent crimes, and narcotics distribution. *See United States v. Kwasi Mack, et al.*, Third Superseding Indictment, Crim. No. 14-220 (MCA).

5. The rules governing the NJ Grape Street Crips provide that members of the Enterprise must retaliate against individuals who cooperate with law enforcement against the NJ Grape Street Crips. As a result of these rules, members of the NJ Grape Street Crips routinely engage in acts of intimidation and violence against witnesses, individuals who are believed to be cooperating with law enforcement, and law enforcement officers themselves.

6. As described in detail below, members of the NJ Grape Street Crips routinely use social media, cellular telephones, and other means: (i) to identify publicly individuals who are cooperating, or who previously have cooperated, with law enforcement; (ii) to issue threats against individuals who are cooperating with law enforcement; and (iii) to disseminate messages intended to dissuade individuals and witnesses from cooperating with law enforcement. For example:

a. In March 2015, law enforcement officers lawfully intercepted wire communications of Ahmed Singleton, a/k/a "Gangsta-Mu," a/k/a "Mooshie"—a member of the NJ Grape Street Crips charged in a separate federal criminal complaint[1]—who had been charged by the Essex County Prosecutor's Office with, among other charges, aggravated assault with a weapon in connection with a shooting. During a conversation with another member of the Enterprise, Singleton was bragging that he had "beat trial." During the ensuing conversation, Singleton indicated that he had his "goons" in the back of the courtroom to intimidate the victim/witness. Singleton further explained, "When [the victim/witness] came out, when they brung him out, I was shooting that nigga 50 to life. I wanted to grab that ni**a on the stand and choke his ass." According to Singleton, "When [the victim/witness] got up there [i.e., the witness stand in state court], he was like, 'Yo, I don't got nothing to say.'" As a result of these efforts by Singleton and other members of the NJ Grape Street Crips to intimidate the victim/witness, all charges against Singleton in connection with the shooting had to be dismissed.

b. In late 2013, a senior member of the NJ Grape Street Crips used a social media account to identify an individual as having previously cooperated with a murder investigation conducted by the Essex County Prosecutor's Office. Several days after that social media post, several members of the NJ Grape Street Crips repeatedly shot and nearly killed two people, one of whom was the individual who had been identified as having cooperated.

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[1] Singleton is charged in a Third Superseding Indictment, along with other senior members of the NJ Grape Street Crips, with racketeering and narcotics offense. *See United States v. Kwasi Mack, et al.*, Third Superseding Indictment, Crim. No. 14-220 (MCA).

c. In late 2013, following the arrest of numerous gang members, law enforcement officials learned that members of the NJ Grape Street Crips on the street had directed those members of the Enterprise who were incarcerated at a county correctional facility to physically harm an individual who was believed to have cooperated with the law enforcement investigation.

d. A video posted on YouTube shows Ahmed Singleton, a/k/a "Gangsta-Mu," a/k/a "Mooshie," stating, "No rats though, no rats, we don't do rats, we don't eat cheese. Keep that shit over there, we don't tolerate that shit." At that point, defendant Justin Carnegie, a/k/a "Dew Hi," a/k/a "Aaron Dickerson"—a member of the NJ Grape Street Crips charged in a separate federal criminal complaint[2]—states, "187 on all rats. . . . If ya'll don't hear anything else, ya'll gonna hear about how we be straight rat killin on that shit. It ain't no love over here. If a nigga associating with them, they could die too." Based on my knowledge and experience, the term "187" is a gang reference to the California Penal Code Section 187, which defines the crime of murder. Thus, the phrase "187 on all rats" means that individuals who cooperate with law enforcement should be murdered.

e. A post on a social media account used by Justin Carnegie, a/k/a "Dew Hi," a/k/a "Aaron Dickerson," shows an extremely graphic photograph of a bloody individual with his jaw and neck blown away from his face. The caption to the post states: "@AllSnitches I bet ur ass won't talk again #187AllRats."

f. A video posted on a social media account shows a member of the NJ Grape Street Crips, while holding a stack of papers in his hand, stating: "I've seen a lot of ni**as paperwork man . . . shit thicka then a book, I ain't never seen nobody's motherfuckin paperwork this motherfuckin thick. Ni**a told on everybody man . . . . you fuckin rat." Based on my knowledge and experience, the word "paperwork" in this context refers to the pretrial discovery received by criminal defendants. Members of the NJ Grape Street Crips frequently obtain and circulate to other gang members any discovery documents suggesting that an individual or fellow gang member is cooperating with law enforcement or has provided law enforcement with information about other gang members or the Enterprise generally.

g. A social media account used by a senior member of the NJ Grape Street Crips who is facing a federal indictment in this District shows a post stating: "ME AND MY NI**AZ WILL BURN OUR TONGUE B4 WE RAT

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[2] Carnegie is charged in a Third Superseding Indictment, along with other senior members of the NJ Grape Street Crips, with various racketeering, violent, and narcotics offenses. *See United States v. Kwasi Mack, et al.*, Third Superseding Indictment, Crim. No. 14-220 (MCA).

#TEAMKAR." Based on my knowledge and experience, the phrase "TEAMKAR" means "Team Kill All Rats."

7. Members and associates of the Enterprise, including the defendant charged herein, utilized their affiliation with the NJ Grape Street Crips to protect and otherwise assist their drug-trafficking business. Further, members and associates of the Enterprise, including the defendant charged herein, engaged in violent acts to maintain and enhance the reputation of NJ Grape Street Crips for the purpose of protecting and otherwise assisting their drug-trafficking business.

8. Members and associates of the NJ Grape Street Crips engaged in, and/or controlled, drug trafficking and other criminal activities in various public-housing complexes and neighborhoods in Newark, New Jersey, including (i) the area of 6th Avenue and North 5th Street (the "6th Avenue Location"); (ii) the Pennington Court public-housing complex located on Pennington Street (the "Pennington Court Location"); (iii) the Millard Terrell Homes public-housing complex located on Riverview Terrace (the "Riverview Court Location"); (iv) the Oscar Miles public-housing complex located on Court Street (the "Oscar Miles Location"); (v) the New Hope Village housing complex located on Norfolk Street (the "New Hope Village Location"); (vi) the Wynona Lipman Gardens and Kemsco public-housing complexes located near 7th Avenue (the "7th Avenue Locations"); and (vii) the John W. Hyatt public-housing complex located on Hawkins Street (the "Hyatt Court Location").

THE INVESTIGATION

9. Defendant Sean L. Scott, Sr., a/k/a "Ali Rock" ("Scott") is a member of the NJ Grape Street Crips who was involved in the distribution of heroin in and around the Pennington Court Location, among others.

10. On or around February 4, 2016, Scott sold to an individual ("Individual-1") approximately five (5) bricks of a substance that subsequently field-tested positive for the presence of heroin, in exchange for an amount of United States currency.[3] This controlled purchase took place in or around Newark, New Jersey.

11. Before the controlled purchase described above, Individual-1 was (a) outfitted with an audio-video recording device; (b) searched before and after to ensure that Individual-1 did not have any unauthorized contraband; and (c)

[3] A "brick" of heroin is a street term referring to a package of narcotics containing approximately five "bundles" of heroin, each of which, in turn, contains 10 individual doses or "hits" of heroin. Thus, one brick contains approximately 50 individual doses or "hits" of heroin.

provided with an amount of United States currency. Accordingly, the controlled purchase described above was video-recorded.

12. On or about October 2, 2012, Scott was convicted of distributing a controlled dangerous substance on school property, in violation of N.J.S.A. 2C:35-7, and resisting arrest, in violation of N.J.S.A. 2C:29-2. On or about September 28, 2012, Scott was convicted again of distributing a controlled dangerous substance on school property, in violation of N.J.S.A. 2C:35-7. As a result of these prior convictions, if Scott is convicted of the instant charged offense, he qualifies as a career offender under the United States Sentencing Guidelines.