

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 11-
	:	
SAMAD MCCALLUM,	:	18 U.S.C. § 1959(a)(5)
	:	18 U.S.C. § 922(g)(1)
	:	18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

(Conspiracy to Commit Murder)

1. At various times relevant to this Information, defendant SAMAD MCCALLUM together with other persons, known and unknown, were leaders, members and associates of the criminal organization that was known and referred to as the Fruit Town and Brick City Brims Set of the Bloods street gang. Members and associates of the Fruit Town and Brick City Brims Set of the Bloods street gang engaged in criminal acts, including murder, attempted murder, conspiracy to commit murder, kidnapping, extortion, conspiracy to commit extortion, assault, drug trafficking, witness intimidation and bribery.

2. The Fruit Town and Brick City Brims Set of the Bloods street gang constituted an enterprise, as defined in Title 18,

United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving its objectives.

Background of the Fruit Town and Brick City Brims Set

3. In the early 1970s, a street gang was formed in Los Angeles, California called the Bloods. As time passed, the Bloods spread to areas surrounding Los Angeles and other locations, and broke into units or sub-groups, called "sets," each identified or affiliated with a certain street, neighborhood or area. Each set may, in turn, be comprised of sub-sets.

4. During the early 1970s, a set of the Bloods, called the Fruit Town Brims, "FTB" or "Brims" was established in Los Angeles. V. Y. was a member of the Los Angeles-based Fruit Town Brims. In or about 1993, V. Y. traveled to New Jersey and while there, he killed a person who he believed had threatened members of the Bloods street gang. V. Y. was convicted of aggravated manslaughter and sentenced to a New Jersey state prison term. While at East Jersey State Prison in Rahway, New Jersey, V. Y. founded and became the leader of a New Jersey-based set of the Fruit Town Brims.

5. After being transferred to Northern State Prison in Newark, New Jersey, V. Y. recruited fellow inmates to become members of his New Jersey-based Fruit Town Brims set, thereby

increasing the membership of his Fruit Town Brims set.

6. One of the fellow inmates who V. Y. recruited to join the Fruit Town Brims was A. G., who was from the Essex County, New Jersey area. After A. G. joined the Fruit Town Brims, V. Y. promoted A. G. to a leadership position in the New Jersey-based Fruit Town Brims set.

7. In or about 1999, V. Y. gave A. G. permission to start a sub-set of the New Jersey-based Fruit Town Brims set, which would operate primarily in the Essex County, New Jersey area. The "Brick City Brims" was the name given to the Essex County sub-set of the larger Fruit Town Brims set. Members of the Brick City Brims sub-set were members of the larger Fruit Town Brims set. Although A. G. was the leader of the Brick City Brims sub-set, V. Y. ultimately controlled the Brick City Brims sub-set as the leader of the Fruit Town Brims Set (together hereinafter, the "Fruit Town and Brick City Brims Set" or the "Set"). Members of the Brick City Brims, among other things, ultimately reported to V. Y., abided by the protocols of the Fruit Town and Brick City Brims Set as set forth below, were required to know V. Y.'s life history as set forth below and routinely sent financial support to V. Y.

8. Initially, the Fruit Town and Brick City Brims Set was comprised of inmates who conducted the enterprise's business primarily within New Jersey prisons. As incarcerated Fruit Town and Brick City Brims Set members and associates were released from prison, however, they also established operations and

engaged in criminal activity outside of prison at locations in New Jersey in which they resided, including Jersey City, Newark, and Paterson. Although the gang began to operate and grow outside of prison, V. Y. and A. G. continued to control the Fruit Town and Brick City Brims Set from prison.

The Fruit Town and Brick City Brims Set
Establish a Structure and Protocols

9. V. Y. established a hierarchical membership structure for the gang in cities, prisons and jails throughout New Jersey, from senior rank to junior rank, which eventually included "OOOG" (Triple OG; "OG" is short for "Original Gangster"), "OOG" (Double OG), "OG," "Baby OG," captains, five star generals, lieutenants, sergeants and individual members, who are called soldiers or "Brims." The positions of "OOOG" through "sergeant" are sometimes referred to as leadership or "status" positions.

10. The Fruit Town and Brick City Brims Set has followed and continues to follow many of the same traditions and protocols as the West Coast Bloods, including:

- a. An identification with the color red, which appears prominently in clothing, hats and bandanas worn by Bloods members;
- b. Tattoos signifying their membership in the Fruit Town and Brick City Brims Set and the Bloods, including a tattoo of the State of New Jersey;
- c. A long-term and often lethal rivalry with the Crips street gang, whose signature color is blue;

d. Use of a system of verbal codes, written codes and hand signals to communicate with each other and to signify their association with the Bloods or a set of the Bloods; and

e. Use of a system of rules and regulations which govern the Bloods, its membership and entry into the Bloods.

11. The rules governing entry into the Bloods sometimes require those seeking membership to commit acts of violence against another person, or to be beaten or "jumped in" by one or more fellow Bloods members.

12. The rules governing the Bloods also establish penalties for those who violate the rules or "disrespect" higher ranking members of the Bloods. Such penalties include being "disciplined" or physically assaulted by fellow members, being stripped of one's leadership status within the Bloods, being placed on probationary status within the Bloods and/or being labeled "food." All members of the Bloods are directed to violently attack and/or kill any person labeled "food."

13. The rules governing the Fruit Town and Brick City Brims Set require members to learn and be quizzed about the history of the West Coast Bloods (known as the "69"), including the life history of V. Y., which details his childhood, the crimes he committed, including the above-mentioned murder he committed in New Jersey, and his struggles against the Crips street gang. Failure to recite this history to the satisfaction of a ranking member could result in a member being physically disciplined.

Objectives of the Enterprise

14. At all times relevant to this Information, the objectives of the Fruit Town and Brick City Brims Set enterprise included the following:

a. enriching the members and associates of the enterprise, including those who were in prison and jail through, among other things, acts in violation of the laws of the United States and the State of New Jersey including, but not limited to, acts involving murder, kidnapping, aggravated assault with a deadly weapon, robbery, bribery, extortion, threats of violence, trafficking in controlled substances and intimidation of witnesses;

b. preserving and protecting the power and influence of the enterprise and its members and associates, both in and out of prison and jail, through, among other things, acts in violation of the laws of the United States and the State of New Jersey including, but not limited to, acts involving murder, kidnapping, aggravated assault with a deadly weapon, robbery, bribery, extortion, threats of violence, trafficking in controlled substances and intimidation of witnesses; and

c. promoting and enhancing the enterprise and its members' and associates' activities by, among other things, providing financial support, drugs and information to members and associates of the Fruit Town and Brick City Brims Set both in and out of prison and jail, as well as the Bloods street gang in

general.

Methods and Means of the Enterprise

15. Among the methods and means by which the defendants and other members and associates of the Fruit Town and Brick City Brims Set conducted and participated in the conduct of the affairs of the enterprise are the following:

a. V. Y. and other members and associates created, operated and controlled the Fruit Town and Brick City Brims Set by among other things, establishing a means of recruiting new members and associates, of developing and enforcing rules of conduct for members and associates, of generating and distributing income for the enterprise and its members and associates, and of protecting and enhancing the criminal activities of the enterprise and its members and associates;

b. Leaders, members and associates of the Fruit Town and Brick City Brims Set maintained and expanded the power and authority of the enterprise by committing and threatening to commit acts of violence, including murders, shootings, extortions and armed robberies;

c. Members and associates of the Fruit Town and Brick City Brims Set maintained or increased their position in the gang by engaging in criminal activity, as directed by leaders, on behalf of the enterprise;

d. Leaders, members and associates of the Fruit Town and Brick City Brims Set carried firearms in order to protect

themselves, threaten others, and otherwise maintain and further the interests of the criminal enterprise;

e. Leaders, members and associates of the Fruit Town and Brick City Brims Set established and maintained discipline within the enterprise by committing or threatening to commit acts of violence to punish members and associates who violated the Set's rules and codes, and to silence enterprise members and associates who they believed were cooperating with law enforcement against members and associates of the Fruit Town and Brick City Brims Set;

f. Leaders, members and associates of the Fruit Town and Brick City Brims Set established and maintained street level drug distribution operations in New Jersey in, among other locations, Jersey City, Newark, and Paterson;

g. Leaders, members and associates of the Fruit Town and Brick City Brims Set protected and expanded those street level drug distribution operations by robbing, extorting or threatening rival drug dealers and others who impeded, or were believed to have impeded, the successful drug distribution activities of the members and associates of the Fruit Town and Brick City Brims Set;

h. Members and associates of the Fruit Town and Brick City Brims Set smuggled controlled substances and other contraband to incarcerated Fruit Town and Brick City Brim Set leaders, members and associates, which they distributed inside

prisons and jails;

i. Leaders, members and associates of the Fruit Town and Brick City Brims Set earned income for the Set and for themselves through their criminal activities, including drug trafficking, robbery and extortion;

j. Members and associates of the Fruit Town and Brick City Brims Set used the proceeds from their criminal activities to, among other things, pay dues that were then provided to or otherwise used to assist incarcerated Set members;

k. Leaders of the Fruit Town and Brick City Brims Set, including V. Y. and A. G., exercised control over Set members and associates both inside and outside prison and jail through the use of letters, including coded letters, through direct contact with other Bloods members and associates, through the use of prison telephone systems and through the use of unauthorized cellular telephones;

l. Members and associates of the Fruit Town and Brick City Brims Set and their associates met on a regular basis to, among other things, report on business related to the gang, including, their committing acts of violence, engaging in narcotics trafficking, physically disciplining members, reinforcing gang rules, identifying persons believed to be cooperating with law enforcement, responding to law enforcement activity, bailing out members and associates who had been arrested, purchasing minute cards for incarcerated members of the

gang who had access to unauthorized cellular telephones and depositing funds into the commissary accounts of incarcerated members;

m. Incarcerated leaders, members and associates of the Fruit Town and Brick City Brims Set used unauthorized cellular telephones to facilitate their leadership over the Set, to coordinate the smuggling of contraband into jail and prison facilities, to discuss the laundering of the proceeds of their illicit activities and to promote and discuss enterprise activity; and

n. Leaders, members and associates of the Fruit Town and Brick City Brims Set routinely reviewed and distributed discovery materials that were provided in connection with criminal proceedings in state and federal courts, at times intimidated and threatened potential witnesses and bribed potential witnesses with things of value to influence the outcome of judicial proceedings.

16. The above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely:

i. acts involving robbery and murder under the laws of the State of New Jersey; and

ii. narcotics distribution, possession with intent to distribute and conspiracy to distribute narcotics, in violation of Title 21, United States Code, Sections 841(a) and

(b) (1), and 846.

17. On or about April 27, 2009, in Hudson County, in the District of New Jersey and elsewhere, defendant

SAMAD MCCALLUM,

for the purposes of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally conspire and agree with others to murder another person, M.B., contrary to N.J.S.A. 2C:5-2, 2C:2-6 and 2C:11-3(a)(1) & 2C:11-3(a)(2).

In violation of Title 18 United States Code, Section 1959(a)(5).

COUNT TWO

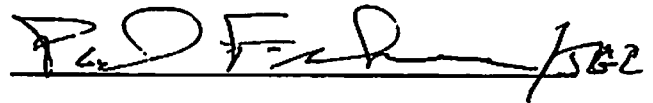
(Possession of Firearms by a Convicted Felon)

On or about April 27, 2009, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SAMAD MCCALLUM,

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce firearms and ammunition, namely, a loaded 9mm handgun bearing serial number BC1005 and a loaded 9mm Tec-9 bearing serial number D005119.

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

A handwritten signature in black ink, appearing to read "Paul J. Fishman", followed by a horizontal line and the initials "JSB".

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

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District of New Jersey**

UNITED STATES OF AMERICA

v.

SAMAD MCCALLUM

INFORMATION FOR

18 U.S.C. § 1959(a)(5), 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 2

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