

RCH:PP/MED  
F. #2021R00019

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

**TO BE FILED UNDER SEAL**

- against -

COMPLAINT AND  
AFFIDAVIT IN  
SUPPORT OF ARREST  
WARRANT

QUANDELLE JOSEPH,

Defendant.

(18 U.S.C. §§ 201(b)(2)(C))

23-MJ-359

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES G. DOBIS, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Justice, Office of the Inspector General (“DOJ-OIG”), duly appointed according to law and acting as such.

On or about and between December 2020 and November 2021, within the Eastern District of New York and elsewhere, the defendant QUANDELLE JOSEPH, being a public official acting on behalf of an agency of the United States, to wit: the Bureau of Prisons, did knowingly, intentionally and corruptly demand, seek, receive, accept and agree to receive and accept, directly and indirectly, something of value, to wit: a sum of United States currency, in return for being induced to do and omit to do one or more acts in violation of his official duty.

(Title 18, United States Code, Sections 201(b)(2)(C) and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the DOJ-OIG and have been involved in the investigation of numerous cases involving official corruption and other crimes against the government. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part.

I. Background

2. The DOJ-OIG, the United States Attorney's Office for the Eastern District of New York, and the Federal Bureau of Investigation are investigating the receipt of bribes by United States Bureau of Prisons ("BOP") correction officers and staff in exchange for smuggling contraband, including cellular telephones and narcotics, into the Brooklyn Metropolitan Detention Center ("MDC"), a federal jail in Brooklyn, New York. The MDC is currently New York City's only federal detention facility. Although most individuals incarcerated at the MDC are detained pre-trial based on federal charges in the United States District Court for the Eastern District of New York or the United States District Court for the

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Southern District of New York, some individuals at the MDC have already been convicted or sentenced. Currently, approximately 1,500 individuals are incarcerated at the MDC.

3. Incarcerated individuals at the MDC are not permitted to possess contraband inside the MDC. According to the BOP's Standards of Employee Conduct (the "Standards of Employee Conduct"), contraband is defined as "material prohibited by law, or by regulation, or material which can reasonably be expected to cause physical injury or adversely affect the security, safety, or good order of the institution," which includes narcotics, cellular telephones, and cigarettes, among other prohibited items. I have learned that contraband, once smuggled into BOP facilities, often sells inside BOP facilities for many multiples greater than its cost outside of BOP facilities.

4. The BOP's Standards of Employee Conduct expressly forbids BOP employees from "offer[ing] or giv[ing] to an inmate or a former inmate or any member of his/her family, or to any person known to be associated with an inmate or former inmate, any article, favor, or service that is not authorized in the performance of the employee's duties" and from "accept[ing] any gift, personal service, or favor from an inmate or former inmate, or from anyone known to be associated with or related to an inmate or former inmate." BOP employees are also not permitted to be "financially involved with inmates, former inmates, or persons known (or who should have been known based on circumstances) to the employee as a family member or close friend of inmates or former inmates."

5. In addition to being prohibited from introducing or distributing contraband, BOP employees are also required to "report to [the Warden] any violation, appearance of a violation, or attempted violation of these Standards or of any law, rule, or

regulation” and “immediately report to management any act or omission by any person that could result in a breach of institution security.”

6. All BOP correction officers, among other BOP employees, receive copies of the Standards of Employee Conduct and sign forms acknowledging receipt when they begin their employment. Employees also receive yearly training on the topics contained therein, including the regulations against contraband.

## II. The Defendant

7. The defendant QUANDELLE JOSEPH began his employment as a correction officer with BOP at the MDC on or about May 26, 2020. That same day, JOSEPH signed a form acknowledging that he had received the Standards of Employee Conduct and that he understood his conduct was to be governed by those standards. JOSEPH continues to work at the MDC until the present.

## III. JOSEPH’s Receipt of Bribes to Smuggle Contraband into the MDC

8. The investigation has revealed that the defendant QUANDELLE JOSEPH received bribes in exchange for smuggling contraband into the MDC. An individual whose identity is known to me (“Inmate-1”) requested to speak with a member of MDC’s Special Investigations Services (“SIS”), which is responsible for, among other things, investigating violations of BOP regulations. During this interview, Inmate-1 stated, in sum and substance and relevant part, that he was involved in smuggling and selling drugs, cellular telephones and tobacco inside the MDC with JOSEPH, as well as with Jeremy Monk,<sup>2</sup> who was another MDC correction officer that met Inmate-1’s family members to

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<sup>2</sup> On or about July 29, 2022, the Honorable Peggy Kuo authorized a complaint

obtain money and contraband to smuggle into the MDC.<sup>3</sup> During the interview, Inmate-1 stated, in sum and substance, that he owed JOSEPH \$12,000 for bringing him contraband.

9. Inmate-1 further stated, in sum and substance, that the defendant QUANDELLE JOSEPH brought him contraband on December 5, 2020. Surveillance video from MDC corroborates Inmate-1's account. On December 5, 2020, JOSEPH was working in unit G43, a housing unit on the fourth floor of the MDC. At this time, the MDC was on lockdown and all inmates were confined to their cells. While the MDC was on lockdown, JOSEPH left the G43 housing unit with a bedroll. A bedroll consists of sheets, blankets, and hygiene items such as a toothbrush and toothpaste typically given to an inmate when they first arrive at the facility. JOSEPH then entered the G42 housing unit across the hall and received the keys to the unit cells from G42's unit officer. JOSEPH proceeded to Inmate-1's cell, had a 30 second discussion with him, and left the housing area without the bedroll. Based on my training and experience and discussions with MDC staff, there is no legitimate reason for an officer of one housing unit to bring a bedroll to an inmate from another housing

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and arrest warrant against Monk for smuggling contraband into the MDC. On September 28, 2022, a grand jury in this district returned an indictment charging Monk with various bribery and contraband smuggling offenses arising out of this course of conduct. Monk pleaded guilty before the Honorable James R. Cho to receiving bribes as a public official on March 20, 2023, and is pending sentence.

<sup>3</sup> Inmate-1 was convicted by a federal jury of racketeering conspiracy, in violation of 18 U.S.C. §§ 1962(d) and 1963(a), and has been sentenced to 240 months' imprisonment. Inmate-1 is currently serving his sentence at another BOP facility; he was not provided any benefits for the information he provided to MDC officials.

unit, especially when that inmate has already been housed at MDC for 10 months and should already have all of the items included in a bedroll.

10. Approximately four hours later, the G42 unit officer reported to SIS that he/she smelled marijuana emanating from Inmate-1's cell and requested that SIS conduct a search. At approximately 2:12 p.m., two SIS Officers ("Officer-1" and "Officer-2") entered the G42 housing unit and searched Inmate-1's cell. Although the officers did not find marijuana, they did locate a contraband cell phone.<sup>4</sup> Officer-1 and Officer-2 then placed Inmate-1 in handcuffs and escorted him to the Special Housing Unit.

11. Based on conversations with Officer-1 and my own independent review of the surveillance video, approximately 18 seconds after Officer-1 and Officer-2 removed Inmate-1 from Unit G42, the defendant QUANDELLE JOSEPH quickly exited his unit (G43) and entered unit G42. Approximately four seconds later, JOSEPH hurried out of G42 and began following Officer-1, Officer-2 and Inmate-1 as they were walking towards the Special Housing Unit. When JOSEPH encountered Officer-1, Officer-2, and Inmate-1 at the elevator bank, JOSEPH asked the officers whether he could search inmate cells. Officer-1 found this request suspicious and denied it because there was no need for JOSEPH to search any cells. Further, because the MDC was in lockdown at this time, unit officers were not permitted to search any cells without supervisor approval.

12. Inmate-1 also stated, in sum and substance, that the defendant QUANDELLE JOSEPH provided Inmate-1 with a phone number ending in -9103 (the

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<sup>4</sup> Inmate-1 later stated that he flushed the marijuana down the toilet as he saw the SIS officers approaching his cell.

“-9103 number”) and advised Inmate-1 that Inmate-1 should give this number to Inmate-1’s contact outside the MDC – an individual whose identity is known to your affiant (“Individual-1”) – so that Individual-1 could communicate with JOSEPH regarding the contraband smuggling. On or about July 12, 2021, the Honorable James R. Cho, United States Magistrate Judge, authorized a search warrant requiring T-Mobile to produce text message communications to and from the -9103 number. Records produced by T-Mobile show that the -9103 number was only used by this subscriber from January 24, 2021, until approximately January 30, 2021. Thus, based on my training and experience, I believe the -9103 number was a “burner phone,” meaning a phone number that is only used for a brief period and then disconnected to attempt to conceal criminal activity.

13. On or about January 25, 2021, one day after activating the -9103 number, the defendant QUANDELLE JOSEPH sent a text message to Individual-1 from the -9103 number, “Grown got 12 bands for me where can we meet?” (“Grown” is one of Inmate-1’s nicknames and “band” means \$1,000.) Based on my training and experience, as well as what I have learned during this investigation, I believe JOSEPH requested \$12,000 from Individual-1 as payment for the money Inmate-1 owed him for smuggling contraband. Individual-1 replied that he/she was not available and suggested another time to meet. I believe that Individual-1 did not pay JOSEPH the \$12,000.

14. During the investigation, other inmates told law enforcement that the defendant QUANDELLE JOSEPH received bribes to smuggle contraband into the MDC. An individual whose identity is known to me (“Inmate-2”) was previously incarcerated at the MDC from July 2021 until November 2021. Inmate-2 was incarcerated in Unit H51 for approximately two months, and JOSEPH frequently worked in this unit at that time.

Inmate-2 stated, in sum and substance, that JOSEPH smuggled contraband into the MDC for an inmate whose identity is known to me (“Inmate-3”). Inmate-2 stated he would frequently buy contraband from Inmate-3, as well as from other inmates who bought the contraband wholesale from Inmate-3. Inmate-3 told Inmate-2 that JOSEPH used to charge \$8,000 to bring in contraband but subsequently raised his price to \$12,000. On one occasion, Inmate-2 was in Inmate-3’s cell and Inmate-3 did not have any contraband. Inmate-3 told Inmate-2 that he should have more contraband as soon as his contact came back to work. At that point, the “count” began at MDC, which requires all inmates to be locked in their cells so that MDC staff can verify the number of people in the facility. Inmate-2 stated that JOSEPH’s shift on this unit began at this time. Inmate-2 saw JOSEPH walk around the unit to each cell counting inmates (a normal practice) but noticed that JOSEPH made these rounds carrying his large camouflage backpack (not a normal practice). Inmate-2 walked into Inmate-3’s cell immediately after inmates were allowed out of their cells when the count was over. Inmate-2 saw marijuana, other narcotics, cigarettes, and at least one cell phone on Inmate-3’s bed. Inmate-2 reviewed a photo book with 15 photographs and positively identified a photograph of JOSEPH.<sup>5</sup>

15. Text messages to and from the -9103 number confirm that the defendant QUANDELLE JOSEPH smuggled contraband into the MDC for Inmate-3. On or

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<sup>5</sup> In June 2021, Inmate-2 pleaded guilty pursuant to a cooperation agreement to conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846 and 841(b)(1)(A), and discharging a firearm during a drug trafficking crime, in violation of 18 U.S.C. § 924(c). Inmate-2 has previously been convicted of multiple state and federal offenses, including narcotics trafficking and robbery, and has violated the terms of supervised release. Inmate-2 has also been convicted of destruction of evidence for flushing marijuana down a toilet as his cell was about to be



about January 26, 2021, JOSEPH, using the -9103 number, texted Inmate-3 on Inmate-3's contraband phone at the MDC with a phone number ending in -0794, "[wasn't] no glasses in the bag."<sup>6</sup> Inmate-3 responded, "Fuck she forgot them in the crib shit i guess i get em next time." Based on my training and experience and this investigation, I know that designer glasses are not permitted in BOP facilities and are a popular item that inmates request to be smuggled into the MDC. That evening, JOSEPH texted Inmate-3, "Tighten up search comin clean phones out call logs n text n try to stash it." The next day, Inmate-3 stated that he and JOSEPH should communicate through Telegram, an encrypted chat application. Later, JOSEPH texted Inmate-3, "keep your phones cleannnnnnnnnnn erase texts and call logs every night."

16. Cell phone location data also shows that the defendant QUANDELLE JOSEPH is the user of the -9103 number. On or about May 21, 2021, the Honorable Ramon E. Reyes, Jr., United States Magistrate Judge, authorized a search warrant for historical cell site location information for the -9103 number as well as a phone number ending in -3604 (the "-3604 number"). The -3604 number is subscribed to by JOSEPH and he provided it to

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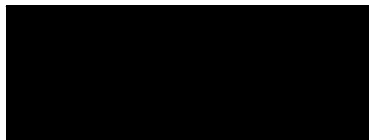
searched when he was in local custody. Inmate-2's information is corroborated by other evidence gathered during this investigation, including the facts set forth in this complaint.

<sup>6</sup> There is probable cause to believe that Inmate-3 used the -0794 number while in the MDC. I have reviewed records from the MDC of the names and phone numbers of individuals Inmate-3 listed as approved to visit him or for him to call through the MDC phone system. These records demonstrate that Inmate-3 was the user of the -0794 number. For example, records produced by T-Mobile show that, between December 7, 2020 and February 17, 2021, the -0794 number had 293 contacts with a phone number listed by Inmate-3 as belonging to his father and sister, 134 contacts with another number listed by Inmate-3 as belonging to his sister, 331 contacts with a number listed by Inmate-3 as belonging to his child, 1,215 contacts with an individual listed by Inmate-3 as belonging to a friend, and 225 contacts with a different individual listed by Inmate-3 as belonging to a friend.

his financial institution when he opened a bank account. Law enforcement analyzed cell site location information for both phones from January 24, 2021 (when the -9103 number was activated) until January 30, 2021 (when JOSEPH appears to have stopped using this phone). For this one week when JOSEPH used the -9103 number as a burner phone, cell site location information shows that the -9103 number and the -3604 number were frequently in the same location. For example, on January 25, 2021, the -9103 number was located near a particular cell tower in Prospect Heights across the street from JOSEPH's residence at 1:26 a.m. and again from 6:19 p.m. until at least 10:55 p.m. The -3604 number was located near that same cell tower at 8:19 p.m. and 10:09 p.m. On that same day, both phones were located near a cell tower in East New York between 7:05 p.m. and 7:10 p.m. The next day, on January 26, 2021, both the -3604 and the -9103 numbers were located near that same cell tower by JOSEPH's residence throughout nearly the entire day, both receiving or placing calls at this same location from 12:36 p.m. until 11:56 p.m. Again, the next day, on January 27, 2021, both cell phones were located near that same cell tower in Prospect Heights by JOSEPH's residence throughout nearly the entire day, both receiving or placing calls at this same location from 12:02 a.m. until 10:27 p.m. Crucially, the cell site location information does not show a single instance when the -9103 number and the -3604 number were in different locations at the same time.

WHEREFORE, your deponent respectfully requests that the defendant QUANDELLE JOSEPH be dealt with according to law. Your affiant also respectfully requests that this affidavit and any issued arrest warrant be sealed as the defendant remains at

large and public disclosure of this affidavit and/or arrest warrant may lead him to destroy evidence, flee or otherwise seek to avoid apprehension.



JAMES G. DOBIS  
Special Agent, United States Department of  
Justice, Office of the Inspector General

Sworn to before me telephonically this  
14th day of April, 2023

Hon. Ramon E. Reyes, Jr. Digitally signed by Hon. Ramon E. Reyes, Jr.  
Date: 2023.04.14 16:11:47 -04'00'

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THE HONORABLE RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

# UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

QUANDELLE JOSEPH

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Case No. 23-MJ-359

\_\_\_\_\_  
*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) QUANDELLE JOSEPH,  
who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 201(b)(2)(C) (bribery of federal employee)

Date: 04/14/2023

Hon. Ramon E. Reyes, Jr. Digitally signed by Hon. Ramon E. Reyes, Jr.  
Date: 2023.04.14 16:12:03 -04'00'

\_\_\_\_\_  
*Issuing officer's signature*

City and state: Brooklyn, New York

\_\_\_\_\_  
Hon. Ramon E. Reyes, Jr., U.S.M.J.

*Printed name and title*

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Arresting officer's signature*

\_\_\_\_\_  
*Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*): \_\_\_\_\_