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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Hon. José R. Almonte  
 :  
 TYLER SHORTER, : Mag. No. 23-16101  
 a/k/a “Money Bags,” :  
 a/k/a “Bags,” :  
 AMIR CANTY, :  
 a/k/a “Blast” :

I, Christopher Johnson, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

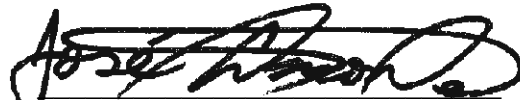
I further state that I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

  
\_\_\_\_\_  
Christopher Johnson, Special Agent  
Federal Bureau of Investigation

Special Agent Christopher Johnson attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on October 11, 2023, in the District of New Jersey

Honorable José R. Almonte  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

**(Conspiracy to Commit Murder in Aid of Racketeering)**

On or about November 8, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**TYLER SHORTER,  
a/k/a “Money Bags,”  
a/k/a “Bags,” and  
AMIR CANTY,  
a/k/a “Blast,”**

for the purpose of gaining entrance to and maintaining and increasing position in, the Sex, Money, Murder street gang, an enterprise engaged in racketeering activity, together with others known and unknown, did knowingly and intentionally conspire and agree with each other and others to murder Victim-1, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:5-2.

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

**COUNT TWO**  
**(Murder in Aid of Racketeering Activity)**

On or about November 8, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**TYLER SHORTER,**  
**a/k/a “Money Bags,”**  
**a/k/a “Bags,” and**  
**AMIR CANTY,**  
**a/k/a “Blast,”**

for the purpose of gaining entrance to, and maintaining and increasing position in, the Sex, Money, Murder street gang, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim-1, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6, and did aid and abet the same.

In violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

**COUNT THREE**

**(Discharging a Firearm During and in Relation to a Crime of Violence)**

On or about November 8, 2022, in Essex County, the District of New Jersey and elsewhere, the defendants,

**TYLER SHORTER,  
a/k/a “Money Bags,”  
a/k/a “Bags,” and  
AMIR CANTY,  
a/k/a “Blast,”**

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the murder in aid of racketeering activity charged in Count Two of this Complaint, did knowingly use and carry a firearm, which was discharged.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

## **ATTACHMENT B**

I, Christopher Johnson, am a Special Agent with the Federal Bureau of Investigation. 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, videos, photographs, and other items of evidence. The information set forth herein contains information obtained from investigators and other law enforcement officers who have interviewed numerous witnesses and sources and reviewed various social media posts. To date, the investigation has involved use of investigative techniques including, but not limited to, information provided by confidential sources, physical and fixed surveillance, telephone record analysis, and location data obtained through search warrants. 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.

### **The Enterprise**

1. At all times relevant to this Complaint, Tyler Shorter, a/k/a “Money Bags,” a/k/a “Bags” (“SHORTER”), and Amir Canty, a/k/a “Blast,” (collectively, the “Defendants”), and others, known and unknown, were members and associates of the Sex, Money, Murder (“SMM”) street gang (the “Enterprise”).

2. Members of SMM can be identified because they outwardly and proudly proclaim their membership in the criminal enterprise on various social media sites, such as Facebook and Instagram, and by the use of various colors, clothing, hand signs, emojis, and/or hashtags. Red is the color most frequently associated with SMM, and members can often be identified by their red-dyed hair or hair tips, red clothing, red beads, red bandanas or handkerchiefs, red hats, red shoes, and red belts. Members and associates of SMM also use various emojis that are red or green in color, with green representing “SLIME,” a term coined in Atlanta, Georgia by a prominent SMM rapper. Law enforcement has frequently observed criminal street gang members, including SHORTER and CANTY, displaying SMM and Bloods hand signs, colors, and mannerisms in uploaded social media images, videos, and “Instagram Stories.” The Enterprise is known for drug distribution in and around its controlled territory, fraud schemes, interstate transportation of stolen property, and prostitution, as well as for violence against numerous rival neighborhoods and gangs. The Enterprise operates in the area of the Bradley Court Housing Complex, also known as the Bradley Court Projects (“BCP”), located near North Munn Avenue at Tremont Avenue in Newark, New Jersey. The Enterprise set operating in BCP are known as M-Blok (“M-Blok”), which is short for Munn Block.

3. The SMM set M-Blok has been involved in an escalating feud with a rival neighborhood-based gang known as GBlock (“GBlock”) whose members are affiliated with the Grape Street Crips (“Grape”) and operate in the area of Goodwin Avenue in Newark, New Jersey.

4. The Enterprise, including its leadership, members, and associates, constitutes an enterprise as defined in Title 18, United States Code, Section 1959(b)(2)—namely, a group of individuals associated in fact that engages in, and the activities of which affect, interstate and foreign commerce. At all times relevant to this Complaint, the Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of that Enterprise.

5. At all times relevant to this Complaint, the Enterprise, through its respective leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1)—namely:

- a. offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communication facility to violate the Controlled Substances Act).

6. For example, from in or around July 2020 through November 2020, the FBI investigated an open-air narcotics market being operated in and around BCP by members and associates of the Enterprise. During the course of the investigation at least nine controlled purchases were conducted wherein members and associates of the Enterprise sold narcotics including heroin, cocaine, and fentanyl. The Enterprise continues to operate an open-air narcotics market in BCP through and including November 2022.

### **Purposes of the Enterprise**

7. The purposes of the Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of the Enterprise through criminal activity, including but not limited to drug trafficking and wire fraud;
- b. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise through the use of acts which

involved intimidation, threats of violence, and acts of violence, including acts involving murder;

- c. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal organizations;
- d. Keeping victims and rivals in fear of the Enterprise and its members and associates; and
- e. Concealing the activities of the Enterprise from law enforcement.

### **Membership in the Enterprise**

8. SHORTER and CANTY were members and associates of the Enterprise. Among other things, they used social media and drill rap music to tout the power of the Enterprise in an effort to keep victims and rivals in fear of the Enterprise, to post photographs of themselves with other members and associates of the Enterprise, and to communicate with other members and associates of the Enterprise.

### **Means and Methods of the Enterprise**

9. Among the means and methods by which Defendants and other members and associates of the Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the Enterprise committed, attempted, and threatened and agreed to commit acts of violence, including murder, to protect and expand the Enterprise's criminal operations;
- b. Members and associates of the Enterprise acquired and maintained firearms to use during violent criminal acts on behalf of the Enterprise, including to protect themselves, their territory, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;
- c. Members and associates of the Enterprise were expected to participate in criminal activity, particularly violent acts directed at rivals or as directed by the Enterprise's leadership, in order to increase the respect accorded to those members, and the commission of crimes and violent acts resulted in those members' maintaining and increasing status within the Enterprise;
- d. Members and associates of the Enterprise promoted a climate of fear through violence and threats of violence and reprisal;

- e. Members and associates of the Enterprise used and threatened to use physical violence against various individuals, including witnesses and members of rival criminal organizations;
- f. Members and associates of the Enterprise trafficked controlled substances as a means of enriching themselves;
- g. Members and associates of the Enterprise engaged in the interstate transportation of stolen property as a means of enriching themselves; and
- h. Members and associates of the Enterprise used the release and promotion of drill rap songs and music videos, and social media, including Instagram and Facebook, to intimidate rival gang members, witnesses, and other members of the community, and to promote the Enterprise.

### **The November 8, 2022 Murder of Victim-1**

10. SHORTER and Victim-1 were rival drill rappers from Newark representing their respective gangs and neighborhoods. On or about October 15, 2022, SHORTER released a music video wherein he disrespected the Grape Street Crips and GBlock – the gang that Victim-1 was a member of. On or about November 2, 2022, Victim-1 released a music video in response to SHORTER including lyrics and representations threatening and insulting SHORTER, SMM, and M-Blok. On or about November 5, 2022, SHORTER released a new song in response to Victim-1, including the lyrics: “If he say ‘Die Munn,’ I’m tryna see what he about” and “[i]f I see a GBlock I’m taking ‘em out[.]”

11. On or about November 8, 2022, at approximately 2:40 p.m., Victim-1 was shot inside a deli located on South Orange Avenue in Newark, New Jersey (“the homicide scene”). Victim-1 suffered a gunshot wound to the head. Ultimately, on or about November 9, 2022, at 2:07 p.m., Victim-1 was pronounced legally deceased. The manner of death was determined to be homicide.

12. Video footage from the homicide scene depicted SHORTER in all black clothing with gray sneakers and a black mask entering the deli and buying a cigar. While in the front of the store, SHORTER repeatedly looked towards the back of the deli where both Victim-1 and the video screen displaying the surveillance recording were located. SHORTER then briefly opened the door to the deli and a black BMW, later identified as a stolen 2021 BMW 330 (“the BMW”), pulled in front of the store and waited. SHORTER exited the deli, approached the front passenger window of the BMW, appeared to converse with the occupants, then brandished a handgun, and returned inside the store. A rear occupant of the BMW opened the door after SHORTER walked away. The driver of the BMW, subsequently confirmed to be CANTY, pulled up slightly and



blocked the intersection while waiting. Once inside the store, SHORTER discharged the firearm at Victim-1 multiple times before exiting the store. After the shooting, SHORTER ran back towards the BMW and entered the rear door that the rear occupant had opened. The BMW fled eastbound on South Orange Avenue.

13. On or about November 8, 2022, at approximately 4:08 p.m., the unoccupied BMW was recovered on Riverside Avenue in Newark, New Jersey (“the burn site”) after it was set on fire. Video surveillance from the burn site revealed that CANTY drove the BMW to the lot accompanied by another one of the BMW’s occupants (“Co-conspirator-1”). Once parked, Co-conspirator-1 and CANTY attempted to light the vehicle on fire. Co-conspirator-1 and CANTY then fled the burn site and ran on foot towards McCarter Highway. Law enforcement lifted latent fingerprints from the BMW, which fingerprints positively matched CANTY.

14. On or about November 8, 2022 the New Jersey State Police Auto Theft Task Force (“ATTF”) had a pending investigation involving the BMW and had affixed a judicially authorized GPS monitoring device to the BMW. The BMW was stolen from Passaic, New Jersey, near the area of Carlton Place and Park Avenue on or about November 6, 2022—two days prior to the homicide—between approximately 2:15 p.m. and 2:25 p.m. Cell site analysis indicates that CANTY’s device was in the area of Carlton Place and Park Avenue at the approximate time the BMW used in the homicide was stolen. On or about November 8, 2022, the ATTF was tracking the BMW physically and via GPS monitoring through various locations in New Jersey until the vehicle traveled into New York. GPS indicated that the BMW traveled to Great Neck, New York. While in Great Neck, the BMW was used in multiple attempted vehicle thefts and an attempted carjacking of an Audi in the area of East Shore Road.

15. After the attempted crimes in Great Neck, the BMW traveled towards New Jersey. Once the BMW was back in New Jersey, the ATTF reestablished physical surveillance. The BMW stopped at a tire repair shop in the area of South Orange Avenue in Newark, New Jersey (the “tire shop”). The tire shop is a short distance away from BCP. The occupants of the BMW exited and appeared to get a tire repaired at the tire shop. The group of four men, including SHORTER, CANTY, Co-conspirator-1, and a fourth conspirator (“Co-conspirator-2”), congregated around the tire shop. SHORTER was observed wearing clothes that match those worn by the shooter during the shooting several minutes later. CANTY was identified as the driver of the BMW when it arrived at the tire shop and when it later departed. CANTY was observed wearing clothing that matched what he was wearing when abandoning the BMW and setting it on fire at the burn site.

16. Surveillance video in the area of the tire shop captures CANTY appearing to remove the front license plate from the BMW. Subsequently, both

SHORTER and CANTY appear to be speaking on their respective phones. The group of individuals can also be observed looking at SHORTER's phone together. SHORTER is then observed waving over a fifth individual ("Co-conspirator-3") who approached the group and ultimately entered the rear passenger compartment of the BMW. At approximately 2:32 p.m., the BMW—driven by CANTY and occupied by SHORTER, Co-conspirator-1, Co-conspirator-2, and Co-conspirator-3—left the tire shop and proceeded west on South Orange Avenue. GPS data shows that the BMW proceeded to the homicide scene at approximately 2:38 p.m., at which time Victim-1 was shot.

17. Historical cell site analysis revealed that the phone number associated with CANTY and the phone number associated with SHORTER both traveled in the area of the tire shop prior to the homicide, the area of the homicide scene during the shooting, and the area of the Great Neck carjacking scene at the time of that attempted offense.

18. GPS records from the device affixed to the BMW indicate that the BMW traveled in conjunction with the movements of CANTY's phone and SHORTER's phone on November 8, 2022 leading up to and during the homicide. The BMW GPS records place the BMW in the area of the tire shop prior to the homicide, the area of the homicide scene during the shooting, the area of the burn site, as well as the area of the Great Neck carjacking scene at the time of that attempted offense.