UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Mag, No. 21-11025

Hon, Andre M. Espinosa

MICHAEL BOOKER: KENRON BOYD. a/k/a "Candyman," a/k/a "Bank." a/k/a "Bankheed," RONALD HAMMOND, a/k/a "Guido," DAMIR HORNE-CASPER. a/k/a "Da," a/k/a "Young Boy," a/k/a "Domi-ye." MARCELL JACKSON, a/k/a "Toon." ROGER JACOBS, a/k/a "Showboat." a/k/a "Man," a/k/a "Man Down," DAMOND KING. a/k/a "Dame," NAQUIS MARTIN a/k/a "Jay," a/k/a "Nas," KORRI MUCKLE, a/k/a "Shaq," TAHJ SMITH, a/k/a "YMC," TROY TAYLOR, and SHAMIR THOMPSON. a/k/a "Sha,"

I, Ruben Rios, 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 Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMEN'T B

Continued on the attached page and made a part hereof:

Task Force Officer Ruben Rios Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to and subscribed to me by telephone pursuant to F.R.C.P. 4.1(B)(2)(A), April 27, 2021 in Newark, New Jersey

HONORABLE ANDRE M. ESPINOSA UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A Count One

(Conspiracy to Distribute Heroin, Fentanyl, and Cocaine Base)

From at least in or around February 2020, through on or about April 26, 2021, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

MICHAEL BOOKER. KENRON BOYD. a/k/a "Candyman," a/k/a "Bank," a/k/a "Bankhead," RONALD HAMMOND. a/k/a "Guido," DAMIR HORNE-CASPER a/k/a "Da." a/k/a "Young Boy," a/k/a "Domi-ye," MARCELL JACKSON. n/k/a "Toon," ROGER JACOBS. a/k/a "Showboat," a/k/a "Man." a/k/a "Man Down," DAMOND KING. a/k/a "Dame," NAQUIS MARTIN. a/k/a "Jay." a/k/a "Nas," KORRI MUCKLE, a/k/a "Shaq," TAHJ SMITH, a/k/a "YMC," TROY TAYLOR, and SHAMIR THOMPSON. a/k/a "Sha,"

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of openine base, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and (b)(1)(C).

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

Count Two

(Possession of a Firearm by a Convicted Felon)

On or about August 15, 2020, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

DAMOND KING, a/k/a "Dame,"

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey. Passaic County, did knowingly possess in and affecting commerce a firearm, namely, a Taurus Millennium 62 9mm semi-automatic handgun, bearing serial number TJP06243, loaded with an extended magazine.

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

ATTACHMENT B

I, Ruben Rios, have been a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") since 2017, and I have been involved personally in the investigation of this matter. The information contained within this complaint is based upon my personal knowledge and on information obtained from other sources, including but not limited to: (a) statements made or reported by witnesses with knowledge of relevant facts; (b) my review of documents and evidence obtained through court orders, subpoenas, and other sources; (c) assistance provided to law enforcement by multiple confidential sources of information; and (d) my review of audio and video recordings of controlled purchases of narcotics. 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 the contents of documents and the actions, statements, and conversations of individuals are recounted herein. they are recounted in substance and in part. 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 Investigation

- 1. Since at least February 2020, law enforcement, including, but not limited to, the ATF, the United States Drug Enforcement Administration, the New Jersey State Police, and local law enforcement have been investigating the Harlem World/12th Ave gang. The Harlem World/12th Ave gang (hereinafter "Harlem World/12th Ave"), is a street gang that operates primarily in and around 12th Avenue and East 23th Street, within the City of Paterson, New Jersey (the gang's "turf"), and elsewhere. The investigation has consisted of, among other investigative tools, numerous controlled purchases of narcotics, consensually recorded telephone calls and text messages, physical surveillance, and analysis of telephone call detail records.
- 2. Harlem World/12th Ave derives its name from a reference to an area in the City of Paterson, New Jersey in which the gang operate, that is on and around 12th Avenue. An individual is eligible to join Harlem World/12th Ave if he resides within the gang's turf and is willing to participate in street-level narcotics sales. An individual gains credibility within Harlem World/12th Ave by selling large amounts of narcotics.
- Members and associates of Harlem World/12th Ave are often involved in feuds with other local gangs, including "5th Avenue," a street gang which operates primarily on 5th Avenue in Paterson, New Jersey.
- 4. The investigation has revealed that Michael Booker ("BOOKER"), Kenron Boyd, a/k/a "Candyman." a/k/a "Bank," a/k/a "Bankhead" ("BOYD"), Ronald Hammond, a/k/a "Guido" ("HAMMOND"), Damir Horne-Casper, a/k/a "Da," a/k/a "Young Boy," a/k/a "Domi-ye" ("HORNE-CASPER"), Marcell

Jackson, a/k/a "Toon" ("JACKSON"), Roger Jacobs, a/k/a "Showboat," a/k/a "Man," a/k/a "Man Down" ("JACOBS"), Damond King, a/k/a "Dame" ("KING"), Naquis Martin, a/k/a "Jay", a/k/a "Nas" ("MARTIN"), Korri Muckle, a/k/a "Shao" (MUCKLE"), Tahj Smith, a/k/a "YMC" ("SMITH"), Troy Taylor ("TAYLOR"), and Shamir Thompson, a/k/a "Sha" ("THOMPSON") are all members and associates of Harlem World/12th Ave, and are all involved in the trafficking of narcotics within Paterson, New Jersey, and elsewhere.

Conspiracy to Distribute Narcotics

- 5. The investigation has revealed that members and associates of Harlem World/12th Ave distribute narcotics, including heroin and cocaine base, primarily in and around the intersection of 12th Avenue and East 23rd Streets, and around the El Abuelo Mini Market, within Paterson, New Jersey.
- 6. Members of Harlem World/12th Ave sell heroin that is frequently mixed with fentanyl, a potent, synthetic opioid that is approximately 50 times stronger than heroin. Heroin and fentanyl distributed by Harlem World/12th Ave is packaged in glassine envelopes, commonly referred to as "decks." These "decks" are commonly sold by Harlem World/12th Ave in "bundles" and "bricks." In Paterson, a "bundle" commonly refers to approximately ten decks of heroin, grouped together. A "brick" commonly refers to approximately 50 decks, often packaged as five bundles that have been grouped together.
- 7. Harlem World/12th Ave distributes decks of heroin that are almost always stamped or labeled with various "brand names" in colored ink. These brand names allow the dealers and purchasers alike to differentiate and market batches of heroin. For example, as described herein, on various occasions, glassine envelopes stamped "BITCOIN" were sold by defendants HORNE-CASPER and BOYD.
- 8. The stamps used by members of Harlem World/12th Ave in the distribution of heroin and fentanyl, including but not limited to "Coca Cola," "Larry Bird," "Kobe Bryant," "Paid in Full," "Best Buy," and "K.O." have been linked to over 10 fatal overdoses in the District of New Jersey, from in or around October 2020 to the present.
- 9. Members and associates of Harlem World/12th Ave sometimes compete with each other for narcotics customers within the gang's turf. However, the investigation has shown that Harlem World/12th Ave work together to ensure that outsiders are unable to distribute narcotics within the turf. Thus, Harlem World/12th Ave work together to preserve and protect the power, territory, and reputation of the gang, and to hinder, obstruct, and prevent law enforcement officers from identifying participants criminal activities, from apprehending offenders of the crimes, and from successfully prosecuting and punishing the offenders.

10. The investigation has revealed the manner and means by which members and associates of Harlem World/12th Ave carried out the objectives of the charged conspiracies to distribute narcotics. Among other things, members and associates of Harlem World/12th Ave did the following in furtherance of the conspiracies' unlawful objectives:

Negotiated narcotics sales inside and around various

business establishments located within the gang's turf;

 Utilized residential yards and vehicles to store narcotics and narcotics proceeds;

Represented the gang on social media, by using names, or

"handles" that contained reference to the gang:

- d. Took affirmative steps to evade detection by law enforcement, including using multiple cellular telephone facilities to communicate with each other and with narcotics purchasers, and speaking in coded language to disguise the illicit nature of their discussions. For example, members and associates of Harlem World/12th Ave typically refer to bricks of heroin as "movies" and quantities of cocaine base as "hard."
- 11. Often, multiple members and associates of Harlem World/12th Ave work together to distribute narcotics. For example, a more senior gang member may have "runners," or Junior gang members who deliver narcotics to the customers of the gang. Indeed, at all times relevant to this Complaint, and based on physical surveillance, controlled purchases, and confidential source information, law enforcement learned that THOMPSON, MUCKLE, and HORNE-CASPER were high-ranking members of Harlem World/12th Ave. As such, they sometimes utilized runners, including BOOKER, SMITH, and at times BOYD, to deliver narcotics to purchasers and accept payment.
- 12. The investigation has also revealed that members and associates of Harlem World/12th Ave have access to firearms. For example, on numerous occasions in and around 2021, JACOBS agreed to assist a confidential source ("CS") in obtaining a firearm. During their conversations, JACOBS explained to the CS, in sum and substance, that some of his (JACOBS) associates were victims of shootings and involved in ongoing disputes in the area. Further, as descried below, KING was arrested by law enforcement on or about August 15, 2020 in the possession of a firearm. Law enforcement also reviewed photographs that revealed that members and associates of the gang possessed firearms.

Controlled Buys of Heroin, Fentanyl, and Cocaine Base

13. Between on or about February 11, 2020 and on or about April 14, 2021, using more than one confidential source ("CS"), law enforcement conducted numerous controlled purchases of narcotics, to include heroin, fentanyl, and cocaine base, from members and associates of Harlem

World/12th Ave. Prior to each controlled purchase, law enforcement officers outlitted each CS and/or his/her vehicle with audio and video recording devices. Law enforcement also provided each CS with U.S. currency to use to purchase the controlled substances. These controlled purchases are outlined in the chart, below:

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
Feb. 11, 2020	MARTIN	2 bundles, stamped "UFC"	Heroin and Fentanyl (L)
Feb. 19, 2020	MARTIN	2 bundles, stamped "Psycho"	Laboratory testing pending
August 12, 2020	HAMMOND	1.5 grams	Laboratory testing pending
Aug. 27, 2020	HAMMOND, THOMPSON, PARKS, and BOOKER	1 brick, stamped "Kobe Bryant" and 10 baggies of suspected cocaine base	Laboratory testing pending
Sept. 2, 2020	MUCKLE	3 grams of suspected cocaine base	Laboratory testing pending
Sept. 16, 2020	THOMPSON and JACKSON	3 bricks, stamped "Larry Bird," "Paid in Full," "Happy Hour," "Public Enemy," and "Best Buy"; and 16 grams of suspected cocaine base	Laboratory testing pending
Sept. 23, 2020	THOMPSON	40 baggies of suspected cocaine base	Laboratory testing pending
Oct. 8, 2020	THOMPSON and ELLIS, JR.	34.5 grams of suspected cocaine base	Laboratory testing pending

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
Oct. 29, 2020	THOMPSON and unknown	27 grams of suspected cocaine base	Laboratory testing still pending
Nov. 12, 2020	JACOBS and others	15 baggies of suspected cocaine base	Laboratory testing pending
Nov. 19, 2020	JACOBS	10 grams of suspected cocaine base	Laboratory testing pending
Nov. 24, 2020	JACOBS	10 grams of suspected cocaine base	Laboratory testing pending
Dec. 2, 2020	JACOBS and TAYLOR	13.35 grams	Cocaine Base (L)
Dec. 9, 2020	HORNE-CASPER	15 grams of suspected cocaine base	Laboratory testing pending
Jan. 7, 2021	HORNE-CASPER	8.773 grams	Cocaine Base (L)
Jan. 14, 2021	JACOBS	4 bricks, stamped "Pooh Sheisty," "Wu-Tang," and "Tik Tok"; and 13,402 grams	Heroin testing pending; Cocaine Base (L)
Jan. 21, 2021	HORNE-CASPER, BOOKER, and MUCKLE	1 brick, stamped "Victory"; and 12 grams	Laboratory festing pending
Feb. 23, 2021	HORNE-CASPER and SMITH	6 bricks, stamped "Kranky"; and 3 grams	Laboratory testing pending
Feb. 25, 2021	SMITH, HAMMOND, and MUCKLE	1 bundle, stamped "777"; and 1 gram	Laberatory testing pending
Mar. 2, 2021	HORNE-CASPER	7 bricks, stamped "Bitcoin"; and 10.5 grams	Laboratory testing pending
Mar. 4, 2021	HORNE-CASPER	I brick, stamped "Bitcoin"; and 1.5 grams suspected cocaine base	Laboratory testing pending

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
Mar. 10, 2021	HORNE-CASPER and BOYD	16 bricks, stamped "Bitcoin," and "Pfizer"; and 4.1 grams	Heroin testing pending; Cocaine Base (L)
Mar. 18, 2021	BOYD and unknown	1 brick, stamped "K.O."; and 10.64 grams suspected cocaine base	Laboratory testing pending
Mar, 18, 2021	HORNE-CASPER and BOYD	5 bricks, stamped "K.O."; and 10 grams suspected cocaine base	Laboratory testing pending
Mar. 24, 2021	HORNE-CASPER and unknown	1 brick and 4.5 bundles, stamped "Bitcoin" and "Pfizer"; and 7.85 grams of suspected cocaine base	Laboratory testing pending
April 14, 2021	JACOBS	16.62 grams of suspected cocaine base	Laboratory testing pending

Seizures of Contraband From Harlem World/12th Ave Members and Associates

July 7, 2020 Arrests of MARTIN, KING, and THOMPSON's sale of Narcotics

14. On or about July 7, 2020, law enforcement conducting surveillance observed approximately six members and associates of Harlem World/12th Ave, including THOMPSON, KING, and MARTIN sitting on corner of 12th Avenue and East 23rd Street, in Paterson, New Jersey. THOMPSON approached a beige Isuzu (the "Isuzu") double parked on East 23rd Street, facing Hamilton Avenue. THOMPSON handed the driver of the Isuzu a small object in exchange for what looked to be, based on investigators' training and experience, a quantity of United States Currency. Based on investigators' training and experience, they believed that they had observed a narcotics transaction. Investigators stopped the Isuzu, which was driven by an

Individual ("Individual-1"). During a lawful search of the Isuzu, investigators recovered three baggies containing suspected crack cocaine. Individual-1 was placed under arrest. THOMPSON left the area immediately after this transaction and a warrant was subsequently issued for his arrest.

- Laboratory testing confirmed the presence of cocaine base in the baggies sold by THOMPSON.
- 16. Minutes later, KING was observed retrieving a small object from a black fanny pack he was carrying and handing the small object to another individual ("Individual-2") in exchange for what looked to be, based on investigators' training and experience, a quantity of United States Currency. Based on investigators' training and experience, they believed that they had observed a narcotics transaction. Investigators then conducted an investigative stop of KING, who was in possession of 1 knotted bag and 22 bags of suspected marijuana in his black fanny pack and 2 pink baggies containing suspected cocaine back inside of the black hat he was wearing. KING was also in possession of \$115 in United States currency.
- 17. Additionally, MARTIN advised investigators that he had a small amount of cocaine base in his waistband. MARTIN was found to be in possession of a small clear sandwich bag which contained 10 pink baggies of suspected cocaine base and approximately \$720 in United States currency.
- 18. The substances inside the 2 pink baggies found on KING and 10 pink baggies found on MARTIN were submitted for laboratory testing. Testing revealed that cocaine was present within.
- 19. On or about July 31, 2020, law enforcement conducting surveillance observed THOMPSON entering a black Mercedes (the "Mercedes") in the area of 12th Avenue and East 23rd Street. Law enforcement conducted a motor vehicle stop of the Mercedes pursuant to the outstanding warrant from July 7, 2020 and THOMPSON was found to be in possession of approximately \$878 in United States currency.

August 15, 2020 Arrest of KING

- 20. On or about August 15, 2020, at approximately 11:10 p.m., members of the Paterson Police Department (collectively "the officers") were in the area of Carroll Street when they observed a grey Chevrolet Malibu (the "Chevrolet") driving at a high speed, passing other vehicles on the wrong side of the road, and driving through a stop sign at the intersection of Carroll Street and Godwin Avenue.
- 21. At this time the officers followed the Chevrolet to conduct a motor vehicle stop as they activated the lights and sirens on the unmarked vehicle

they were operating. The Chevrolet then turned onto Fair street and proceeded the wrong way down the one-way street towards Rosa Parks Blvd. The officers then observed the Chevrolet turn onto Rosa Parks Boulevard and collide with a blue Nissan Altima (the "Nissan").

- 22. At this time, the officers exited their vehicle and approached the scene of the accident. The officers observed a male, later identified as KING, step out of the Chevrolet and observed that he had a large heavy bulge weighing down his sweatpants. The officers immediately gave commands to KING to put his hands up. KING initially put his hands up and then turned and fled on foot down Fair Street, towards Carroll Street.
- 23. One of the officers gave chase after KING to the area of 281 Fair Street, where KING attempted to climb through a window leading to a basement area. As KING was attempting to crawl through the window feet first, the officer observed a black handgun coming out of KING's sweatpants. At this time, the officer kicked the black handgun away from KING and was able to apprehend him.
- 24. Once the officers were able to place KING under arrest, they recovered a black Taurus Millennium 62 9mm semi-automatic handgun, bearing serial number TJP06243 (the "Firearm"), loaded with an extended magazine and lifteen (15) 9mm ballpoint rounds of ammunition. Also found on KING was approximately \$276.50 in United States currency.
- The recovered Firearm was manufactured outside of the State of New Jersey, and thus moved in, and affected interstate commerce prior to August 15, 2020.
- 26. Prior to August 15, 2020, KING had at least one felony conviction, including a conviction in Superior Court, Passaic County, on or about December 18, 2015, for possession of controlled dangerous substance on school property, for which he was sentenced to three years in state prison.