
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **AMENDED CRIMINAL**
 : **COMPLAINT**
 :
 v. :
 : **Mag. No. 14-5014 (TJB)**
 :
 THOMAS SHANNON, a/k/a "Cuzzo," :
 ANTHONY J. BROOKS, and :
 RASHAWN RAMOS :

I, Charles Malos, 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 Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Charles Malos
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
March 20, 2014, at Trenton, New Jersey



Hon. Tonianne J. Bongiovanni
United States Magistrate Judge

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TONIANNE J. BONGIOVANNI
U.S. MAGISTRATE JUDGE

ATTACHMENT A

Count One

From at least in or about November 2013 through in or about March 2014, in Middlesex, Monmouth and Ocean Counties, in the District of New Jersey and elsewhere, defendants

THOMAS SHANNON, a/k/a "Cuzzo,"
ANTHONY J. BROOKS, and
RASHAWN RAMOS

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute controlled substances, specifically: (1) 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and (2) 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(B),

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

Count Two

From at least as early as in or around November 2013 to in or about March 2014, in Middlesex, Monmouth and Ocean Counties, in the District of New Jersey, and elsewhere, defendants

THOMAS SHANNON, a/k/a "Cuzzo," and
ANTHONY J. BROOKS

knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, conspired with each other and others to conduct and attempt to conduct financial transactions that in fact involved the proceeds of specified unlawful activity, namely narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i),

in violation of Title 18, United States Code, Section 1956(h).

Count Three

On or about March 20, 2014, in Monmouth County, in the District of New Jersey and elsewhere, defendant

THOMAS SHANNON, a/k/a "Cuzzo"

did knowingly and intentionally possess with intent to distribute controlled substances, specifically: (1) 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and (2) 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance,

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

ATTACHMENT B

I, Charles Malos, am a Special Agent with the Federal Bureau of Investigation ("FBI") and I have been personally involved in the investigation of this matter. The information contained in this 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 defendants; (c) my review of business records, bank records and other documents and evidence obtained through Court orders, subpoenas and other sources; and (d) my review of court-authorized wiretaps. Because this 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 by monitors.

OVERVIEW

1. The FBI and other law enforcement agencies have been investigating defendants Thomas Shannon, also known as "Cuzzo" ("Shannon"), Anthony J. Brooks ("Brooks"), Rashawn Ramos ("Ramos") and others, in connection with narcotics trafficking in New Jersey and elsewhere. Through court authorized-wiretaps, physical surveillance and other evidence, law enforcement has determined that Shannon distributes large quantities of cocaine and heroin in New Jersey, and that Brooks is one of his main suppliers.

2. The investigation has revealed the manner and means by which the defendants carried out the narcotics trafficking conspiracy. Specifically, Brooks mailed packages containing heroin and cocaine (the "Packages") from California to a residence in Perth Amboy, New Jersey (the "Perth Amboy Residence"). Ramos accepted the Packages at the Perth Amboy Residence and then contacted Shannon to notify him that a Package had arrived. Shannon then went to the Perth Amboy Residence, picked up the Packages from Ramos and took them to other residential locations that he rented or otherwise controlled in Asbury Park, New Jersey (the "Asbury Park Stash House") and Long Branch, New Jersey (the "Long Branch Stash House"). Shannon and other co-conspirators met at the Asbury Park and Long Branch Stash Houses to package and prepare the narcotics for distribution. Shannon then distributed the narcotics to various dealers and others in Ocean and Monmouth Counties, and elsewhere in New Jersey.

3. The investigation further revealed that Shannon, Brooks and others engaged in a money laundering conspiracy through which Shannon funneled proceeds from his narcotics trafficking back to Brooks through various straw bank accounts to, among other things, disguise the illegal source of the funds.

THE CONSPIRACY

4. From at least as early as November 2013 through March 2014, Shannon, Brooks and Ramos conspired to distribute and possess with intent to distribute cocaine and heroin in New Jersey and elsewhere. Law enforcement has reviewed numerous calls and text messages between and among the defendants pursuant to court-authorized wiretaps during which the defendants discussed the prices and quantities of narcotics that Brooks supplied to Shannon, and their use of various straw bank accounts to transfer funds generated from the sales of these narcotics. Some of these calls are described below.

Shipping the Drugs

5. On numerous occasions throughout the conspiracy, Shannon and Brooks communicated by telephone regarding Brooks' shipment of narcotics from California to Shannon in New Jersey. For example, on or about February 4, 2014 at approximately 7:07 p.m., Shannon received a call over a telephone with a number ending in 9917 (the "Shannon 9917 Phone") from Brooks using a telephone with a number ending in 4339 (the "Brooks 4339 Phone"). Brooks told Shannon, "the dude is on the way right now with the white girl man, a half of it, I don't know how we're gonna do this cause I'm not sending it with that Chinatown, that's too much, unless you want me too." Shannon responded, "I need it" and then told Brooks, "yeah, just put it in there." Based on the context of this and other communications that law enforcement has reviewed, "white girl" was code language for cocaine and "Chinatown" was code for heroin. "Half of it" meant one-half kilogram.

6. During the same call, Brooks and Shannon discussed the method of packaging the narcotics to avoid detection. Brooks sounded reluctant to package and send heroin and cocaine to Shannon in the same package, but Shannon stated that he needed it. The following exchange occurred:

Brooks: That's too many boxes going to fat boy's house.

Shannon: Yeah, that shit's gotta be like one, one box.

Brooks: Cause then we gotta do another one Thursday.

Shannon: Yeah, so ah, either you could ah.

Brooks: Put it in there?

Shannon: Yeah, just put it in there.

Brooks: Man, I gotta break a half, I gotta break that down like half.

Shannon: Yeah just figure it out. Hey, ah ah, hey listen, you gotta, you can't just do it, put it in there like that. You have to put it in a box within a box.

Brooks: No no, I am. Like I did the last time. You see I had the potato chips and all that shit in there.

Shannon: Yeah, but you gotta, you gotta, you gotta put it in a box.

Brooks: But I don't want a big ass box that will get noticed, that's why I got a little box right there.

7. On or about February 6, 2014 at approximately 5:35 p.m., Shannon received a call over the Shannon 9917 Phone from the Brooks 4339 Phone, during which he spoke to Brooks. Shannon and Brooks discussed a discrepancy in the weight of narcotics that Shannon had just received from Brooks. Based on statements made during the call, and other evidence, it appears that the agreed upon quantity of the narcotics was 250 grams, or a quarter kilogram. During the call, Brooks stated that he weighed the narcotics before sending the package to Shannon, and that he sent Shannon a picture to his cell phone of the narcotics on the scale. Brooks stated, "did you see the picture we just sent you? I told you I weigh it, it was 25 with the bag."

8. During the same call, Shannon told Brooks that when Brooks weighed the narcotics, he failed to account for the weight of the bag. Shannon stated, "that bag weighed 10.3 Cuz, I just weighed it." Shannon further stated, "it wasn't a quarter, cause the bag weighed over 10," meaning the cocaine itself did not weigh 250 grams because the bag weighed more than 10 grams. The conversation continued as follows:

Brooks: Listen, if you do 28 times 9.

Shannon: Yup, that's 250.

Brooks: 28 times 9. 252, that what you get. It's 252 grams. That's what you get, feel me?

Shannon: What you say?

Brooks: It's 252 grams.

Shannon: Ah ha.

Brooks: Now you see what it says on the thing.

Shannon: Yeah, and so with the bag it's almost ten short.

Brooks then explained to Shannon that the cocaine was only in one bag when he weighed it for the picture that he sent Shannon and that he added a second bag for additional protection before shipping it. The following conversation took place:

Brooks: It's just one bag.

Shannon: It's two.

Brooks: I put the other bag in there to protect it. No, I put two bags homie, that's one bag when I weighed it. I put another bag when I, when I, when we seal it it won't bust through.

Shannon: Look, look, look. Let me. It was two bags. One was shrink-wrapped. I had to, I had to bust that. I couldn't even weigh that cause it was in the um, vacuum shit.

Brooks: When I weighed it, listen when I weighed it when he was there, it was only in one bag. I sealed it with another bag,

Shannon: I know but look, what I'm telling you is that one bag weigh 10.3. 10.3, you gotta start weighing them bags before you send it.

Law enforcement confirmed that on or about February 6, 2014, a package was sent from an address in California to the Perth Amboy Residence. The California address is the address of an individual identified herein as "B.V." (the "B.V. Address"). B.V. and Brooks share several common prior addresses. Further, as noted below, B.V. is also the owner of one of the straw bank accounts that Shannon and Brooks used to transfer the illicit proceeds of the narcotics trafficking.

9. On or about February 19, 2014 at approximately 11:46 a.m., Shannon placed a call over the Shannon 9917 Phone to the Brooks 4339 Phone, during which he spoke to Brooks about a package of cocaine that Brooks had sent Shannon on or about that day. Shannon told Brooks, "I didn't even know it was coming. It's there?" Brooks stated, "Yeah, remember you said as soon as you come back it's already there." Shannon then told Brooks, "I need the whole thing too." Brooks then asked if he meant the "white girl" (meaning cocaine) and Shannon said yes. Based on the context of this and other conversations, Shannon was telling Brooks that he did not expect a delivery of a package of cocaine from Brooks that day. Shannon further told Brooks that he needed the "whole thing," meaning a kilogram of cocaine.

10. Law enforcement confirmed that on or about February 19, 2014, a package was sent from the B.V. Address via overnight mail to the Perth Amboy Residence. Physical surveillance also confirmed that on this date, a package was delivered to the Perth Amboy Residence and that Shannon picked it up and brought it to the Long Brach Stash House. Specifically, at approximately 11:18 a.m., law enforcement conducting physical surveillance in the general vicinity of the Perth Amboy Residence observed a United States Post Office ("USPO") truck arrive and a mail carrier drop a large white box with a USPO logo on the porch of the residence. At approximately 11:24 a.m., an individual matching the appearance of Ramos retrieved the box and brought it inside the Perth Amboy Residence. At approximately 12:34 p.m., Shannon arrived at the Perth Amboy Residence and entered the premises. At approximately 12:42 p.m., Shannon departed the Perth Amboy Residence carrying the white package which matched the appearance of the package that the mail carrier had recently delivered. Shannon then entered his vehicle and departed the area. At approximately 1:21 p.m.,

video surveillance from a pole camera in the general vicinity of the Long Branch Stash House showed Shannon arrive, park his vehicle, retrieve a large white box from the trunk and enter the Long Branch Stash House.

11. Similarly, on March 9, 2014, at approximately 11:25 a.m., Shannon had a telephone conversation with Ramos. Ramos used a phone with a number ending in 7483 (the "Ramos Phone"). During the conversation, Shannon asked Ramos, "Want me come that way now?" Ramos replied that he was at his girlfriend's house and told Shannon, "you gotta come pick me up from my girl's house so I can shoot down and give it to you from my house." Shannon agreed to pick Ramos up at Ramos's girlfriend's house. Thereafter, law enforcement conducting physical surveillance in the general vicinity of the Perth Amboy Residence observed Shannon and Ramos arrive at the Perth Amboy Residence and retrieve a box that appeared to be a USPO package.

The Money Laundering

12. In addition to the narcotics trafficking conspiracy, Brooks and Shannon also engaged in a money laundering conspiracy, the object of which was to transfer the proceeds of narcotics trafficking to Brooks through various third-party bank accounts (the "Bank Accounts") to fund additional narcotics and to disguise the source of those proceeds. Shannon and Brooks discussed these unlawful transactions in numerous calls and text messages.

13. For example, on or about February 3, 2014, Shannon received several text messages over the Shannon 9917 Phone from the Brooks 4339 Phone in which Brooks provided the names and account numbers for three of the Bank Accounts at two different banks ("Bank A" and "Bank B," collectively, the "Banks"). One of these accounts was in Brooks' name (the "Brooks Account") and another was in the name of B.V. On or about the next day, during a call between Brooks and Shannon, Shannon stated, "I'm doing yours last, I'm short five racks, so I gotta go grab it. I'm sitting at [Bank A] right now though." Brooks responded, "For which one?" and Shannon stated, "the one you said you had for [Bank A]." Based on the context of this and other conversations, Shannon was at Bank A depositing money into an account per instructions provided to him by Brooks. Shannon told Brooks that he was short five "racks," meaning \$5,000, and that he had to go get it to put it into Brooks' account.

14. On or about February 6, 2014 at approximately 1:35 p.m., Shannon received a call over the Shannon 9917 Phone from the Brooks 4339 Phone, during which he spoke Brooks. Brooks told Shannon, "for the white girl, 81 in mine I'm trying to get another one for the other 81." Based on the context of this and other conversations, Brooks was telling Shannon to put a total of \$16,200 into two bank accounts, \$8,100 in each account as payment for "white girl," which is believed to be code for cocaine. Later in the conversation, Brooks told Shannon, "you can definitely use mine for one of the 8750, and my brother got [Bank A], no he got [Bank B]." Brooks was again telling Shannon how much money to put into various bank accounts as payment for narcotics.

15. On or about February 7, 2014, at approximately 10:48 a.m., Shannon received additional bank account information and deposit instructions from Brooks. Specifically, Shannon received numerous text messages over the Shannon 9917 Phone from the Ramos

Phone. The Ramos Phone forwarded the Shannon 9917 Phone text messages from another phone used by Brooks ending in 6667 ("Brooks 6667 Phone"). The message stated, "HEREZ 6 FOR THA \$50, 000," meaning six bank accounts for Shannon to use to transfer \$50,000 to Brooks. The Shannon 9917 Phone then received several additional text messages with names and account numbers for various accounts at the Banks, including Brooks' account and B.V.'s account. Additional messages sent in this series stated, "All them is \$8,300 and last one \$8,500," "And tha \$17, 500 for whkite bkitchk," meaning the amounts that Shannon should deposit into each account, including \$17,500 for the "whkite bkitchk," meaning cocaine.

16. Later that day, at approximately 12:22 p.m., Shannon placed a call over the Shannon 9917 Phone to the Brooks 4339 Phone. Shannon and Brooks discussed Shannon's deposits of funds in several of the Bank Accounts that Brooks had provided. Shannon advised Brooks that he did not want to use one of the accounts because he was concerned that the bank would ask him for identification. Shannon stated that "everything else" was done. Surveillance images provided by Bank B depict Brooks at a teller window at a Bank B location in or around Fontana, California shortly after the above-described call with Shannon.

17. Also on or about February 7, 2014, at approximately 1:52 p.m., Shannon placed a call over the Shannon 9917 Phone to the Brooks 4339 Phone. Shannon and Brooks discussed, among other things, the need to establish a better method of transferring funds because, according to Brooks, moving the money through the various bank accounts could alert the "feds." Brooks mentioned the possibility of driving to New Jersey to meet Shannon in person. The following conversation took place:

Brooks: We gonna have to drive out there man. That's the only, the best thing I could.

Shannon: Alright, well come on. Let's go.

Brooks: I know. I know. I know. Because these accounts. It's gonna be dangerous in a minute because the feds gonna see a lot of money coming through these accounts.

Shannon: Yeah that's why I'm saying, we gotta do it a better way cuz. You gonna send the bitch with it too. I need her too man, tell him come on.

Brooks: This dude. He need another thing of the bitch too. Man. That ain't gonna be a problem. I'm here with my boy now. I just pulled up. I came from court in LA.

18. Later on February 7, 2014, after the above text messages listed in paragraphs 15 and 16 were sent, Shannon received a call over the Shannon 9917 Phone from the Brooks 4339 Phone and spoke to Brooks. Brooks asked Shannon, "you got the list of names that you used, cause this nigga Antonio is saying there is no money in his account." "Antonio" is the first name of one of the account holders that Brooks provided to Shannon in the text messages earlier that day. Shannon replied that he put the money in Antonio's account and that he had the receipt.

Brooks then read Antonio's account number to Shannon and Shannon confirmed that he deposited money into that account.

19. Records provided by the Banks further establish that Brooks and Shannon used the Bank Accounts to launder the proceeds of the narcotics trafficking conspiracy. Specifically, these records reveal that during the time period of the conspiracy, the Bank Accounts generally had low beginning and ending balances each month, and had high volumes of cash deposits and withdrawals each month with the amounts deposited generally matching the amounts withdrawn. As one example, between Dec 17, 2013 and January 16, 2014, approximately \$22,194 was deposited into the Brooks Account, and approximately \$23,890 was withdrawn. The closing balance at the end of this period was approximately \$783.00. Most, if not all, of these deposits and withdrawals were cash transactions.

THE MARCH 20, 2014 NARCOTICS SHIPMENT

20. Between or about March 18, 2014 and March 20, 2014, Shannon communicated via text messages and telephone calls with Brooks' heroin and cocaine supplier (the "Supplier") who is located in California. The purpose of these communications was to coordinate a shipment of a large quantity of narcotics from the Supplier to one of Shannon's stash houses in New Jersey. Law enforcement intercepted these communications pursuant to a court-authorized wiretap.

21. For example, on March 18, 2014, Shannon received a phone call from the Supplier during which they planned the shipment of the drugs from the Supplier to Shannon, including the price and destination of the shipment. The following conversation took place:

Supplier: Alright, you're gonna send the chip for that whole one, right?

Shannon: Yeah.

Supplier: Alright. And then, so I'm gonna send you the whole one and the half right?

Shannon: That's cool.

Supplier: And uh, so the whole one is 25 and you already know how much the other one is right?

Shannon: Alright.

Supplier: Alright.

Shannon: Cool.

Supplier: I'm gonna text you the info right now.

Shannon: **Alright.**

Supplier: **Text me the address.**

Shannon: **Alright.**

Based on the context of this and other communications, the Supplier was telling Shannon that he would ship him one kilogram of cocaine and one half kilogram of heroin. The Supplier told Shannon that the kilogram of cocaine would be \$25,000, and that Shannon already knew the price of the half kilogram of heroin.

22. On March 18, 2014, at approximately 12:00 p.m., Shannon received text messages from the Supplier containing bank account information, including account numbers and account holder names, for Shannon to use to deposit cash for payment for the cocaine and heroin. Later the same day, Shannon sent the Supplier a text message advising of the address to use in shipping Shannon the cocaine and heroin. The address Shannon provided was the address of the Long Branch Stash House. The next morning, the Supplier sent Shannon a text confirming the delivery address. The Supplier said the packing was “going out today.” Shannon replied in a text, “let me know wat time it should touch. Or tha tracking number.” Later that day, the Supplier sent Shannon the tracking number in a text message.

23. On or about March 20, 2014, a USPS parcel bearing the tracking number that the Supplier provided to Shannon arrived at a USPO in Long Branch, New Jersey (the “Parcel”). The parcel was delivered to the Long Branch Stash House. A USPS employee arrived at the Long Branch Stash House with the Parcel, knocked on the door and announced that he had a package to deliver. Shannon came outside of the Long Branch Stash House to sign for and receive the Parcel. Shortly thereafter, law enforcement arrested Shannon and took him into custody. Law enforcement also took possession of the Parcel. Thereafter, law enforcement searched the contents of the Parcel pursuant to a search warrant issued by the United States District Court, District of New Jersey. The Parcel contained a substance that field tested positive for cocaine and weighed approximately 1,112 grams, and a substance that field tested positive for heroin and weighed approximately 576 grams.